



Phil Hogan
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels

20th March 2018

Dear Commissioner,

We are writing to you as civil society representatives (environmental NGOs, farmers, food movements, and animal welfare groups) regarding the Common Agricultural Policy (CAP) reform, following recent details given in presentations to the Council and the Parliament on its substance, **in particular the common EU objectives.**

- 1) We would like to recall that for the next CAP to be truly results-oriented, make effective and efficient use of EU taxpayers' money, and respond to citizens' demands to better protect our natural resources, ensure the welfare of farmed animals and ensure many and diversified farms, the **EU objectives should be specific, measurable and time-bound** so that progress towards them can be properly monitored.¹
- 2) Unfortunately **we are very concerned that the objectives will be very general and vague**, which will make it very easy for Member States to systematically choose the least ambitious measures without facing adequate monitoring or control—as experienced with the last reform's 'greening', which added complexity and completely failed to address the challenges facing the sector.
- 3) Furthermore, objectives focussed on increasing production—such as 'food security'—are not only unjustified in the context of overproduction and overconsumption in Europe, especially of animal products, but also risk undermining other objectives on the long-term resilience of the sector, the environment, animal welfare, climate, human health and fair income for the smallest and most sustainable farms.
- 4) Finally, we believe that the first step to achieving objectives is the honest recognition of the problems. It is therefore worrying that the Commission seems to be ignoring the social and environmental crises in EU agriculture. Only with a factual, scientific assessment of where we are and where we need to go can we set the right objectives and a) genuinely achieve a transition to sustainable agriculture, an EU budget for results and EU added value, b) maximise agriculture's contribution to meeting Europe's international commitments such as the Sustainable Development Goals and the Paris Agreement, and c) ensure a fair distribution of the resources based on the contribution to the goals defined.

¹ E.g. The biodiversity objective should be to achieve the favourable conservation status of all relevant species and habitats under the Birds and Habitat's Directives. See further examples in [Hart et al. \(2018\), Defining EU environmental objectives and monitoring systems for a results-oriented CAP post 2020.](#)

Vague, contradictory, non-quantifiable and at worst unfounded and outdated EU objectives risk adding a new layer of complexity, market distortions, inefficiency and ineffectiveness to the CAP. **Such a state of affairs would not justify such a large proportion of the EU budget being spent on the policy**, and risks undermining the legitimacy of EU spending in general.

We therefore very much hope that you will respond to our concerns and remain at your disposal for any follow up meetings regarding the solutions we have to make the future delivery model work for people, sustainable EU farming and the environment alike.

Yours sincerely,



Ariel Brunner, Senior Head of Policy
Birdlife Europe and Central Asia

On Behalf Of:

Arche Noah



BirdLife Europe and Central Asia



Compassion in World Farming



Eurogroup for Animals



European Environmental Bureau



Greenpeace



Humane Society International / Europe



Pesticide Action Network / Europe



Slow Food

