











To: EU Ministers of Agriculture

## **OPEN LETTER**

Subject: Environmental ambition of the CAP: Test for the Council and the CAP budget

## Dear Ministers.

We are writing to you in relation to the upcoming AGRIFISH Council, in particular regarding the Presidency compromise text, which was recently published with the view to come with the Council position in the coming months. In particular, we would like to highlight the importance of issues surrounding the interconnection between agriculture and the environmental crisis. The stakes of this debate for the survival of future generations and farmers' livelihoods have never been higher; the latest report of the UN FAO warns that the loss of biodiversity from intensification is a severe threat to future food supply.

We want to see agriculture moving from being a key driver of the problem, to being a key part of the solution. The current CAP reform is the last chance to prove that the CAP is the right policy tool for addressing these challenges.

For this reason, we are closely following the progress of debates on the CAP. The next EU budget has explicitly promised that the next CAP must deliver a higher environmental and climate ambition. Already leading analysts and the Court of Auditors have said that the Commission's proposal "falls short" in this regard and must be strengthened. The Council must therefore now work hard to prove that the CAP budget can be justified through increasing the environmental ambition of the CAP, according to the four following tests:

- Does the Council propose to increase the funding for environmental and climate measures, and specific funding for biodiversity?
- Does the Council ensure coherence across the new CAP and eliminate environmentally harmful CAP subsidies?
- Does the Council increase the basic conditions for payments and improve law enforcement regarding the environment and the welfare of farmed animals?
- Is the Council improving the governance and accountability framework for future CAP spending?

So far, we are highly disappointed to see that, as with the previous CAP reform, the Council as a whole appears to be further weakening the Commission's proposal (see attached annex, with our proposals how to turn this around).

<sup>&</sup>lt;sup>1</sup> EU Court of Auditors, Opinion No 7/2018: concerning Commission proposals for regulations relating to the Common Agricultural Policy for the post-2020 period; Hart K and Bas-Defossez F (2018) CAP 2021-27: Proposals for increasing its environmental and climate ambition, report for NABU by IEEP.

We are running out of time to save the ecosystems on which we depend for food and life. You have a responsibility to take decisions now which do not benefit narrow groups of interests but that are in the long-term interests of the whole farming community, the whole of society, and the future of Europe. Otherwise, the generous share of the EU budget the CAP receives can no longer be justified.

hul Boller

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On Behalf Of:

BirdLife Europe and Central Asia

Compassion in World Farming

European Environmental Bureau

Humane Society International/Europe

Pesticide Action Network/Europe

Slow Food Europe

## Annex: Tests for the environmental ambition of the next CAP

Key

Red = worsening of the Commission's proposal

Yellow = no change to the Commission's proposal

Green = improvement of the Commission's proposal

Test	Current presidency compromise text	What would justify the CAP budget
1(a) Money for nature: Will the Council allocate specific funding for biodiversity?	No specific money for nature.	To address the dramatic decline of biodiversity due to intensive farming, EUR15bn a year is needed from the CAP to go to dedicated measures for addressing this crisis, by supporting nature friendly farming practices and measures.
1(b)Will the Council allocate money to eco- schemes	No pre-defined allocation of funds to eco-schemes. Ongoing discussions to make them voluntary for Member States.	Environmental NGOs, organic farmers and peasant farmers have asked for at least 50% (and up to 70%) of the CAP to go to Eco schemes.
1(c) Will the Council increase the ring-fencing in pillar II for the environment?	ANCs re-integrated into ring-fencing for environmental measures, while allocated percentage remains at 30%. De facto reducing the environmental spending compared to the Commission's proposal (in some countries like Finland and Luxembourg, by around 90%).	Environmental NGOs, organic farmers and peasant farmers have asked for at least 50% (and up to 70%) of the CAP to go environmental and climate measures in Pillar II.
1(d) Will the Council move ANC payments to Pillar I?	Payments to ANCs put back into the environmental ring-fencing and remain in Pillar II.	The Commission proposal rightly excludes ANC payments from Pillar II money for environment and climate, because they are not linked to any environmental conditions. As these are income payments, they should be moved to the Pillar I budget.
2(a) Will the Council ensure the CAP coherence and eliminate perverse subsidies, such as payments to factory farms, coupled support, risk management, investments?	Keeping the limit for 'Voluntary Coupled Support' of the Commission's original proposal. No significant improvement to risk management support, still no focus on risk mitigation.	We are still subsidising polluters and environmentally harmful practices through the CAP. The Council needs to put an end to these subsidies, and include strong environment proofing of all CAP measures. Strong safeguards on irrigation need to be put in place, to reduce the amount of irrigated land and the amount of water extracted.
2(b) Will the Council ensure that necessary safeguards are placed on	No additional safeguards for investment aid and weakened safeguards on investments in irrigation.	No investments (or other practices) should be funded that increase the irrigated area or increase overall water use (such as investments in more

Support?   Goes back to the 'Omnibus definition'. Compared to the EC proposal it allows the eligibility criteria do not lead to environmental errassland. This would lead to many areas, which are at the moment considered to be grassland, to be no more protected.    Annexes are not part of document. Exemptions from GAECs for farmers below a yet to be defined threshold of agricultural area in ha are introduced. Improve the conditionality?   Annexes are not part of the document.	Γ.		I am
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