



Position on CAP Reform for the Incoming AGRI Committee

9 July 2019

The next CAP needs to encourage a much needed transition allowing farmers to start seriously working with nature. The CAP should incentivize farmers to progressively adopt agronomic practices to strengthen soil health and to create landscape features attracting predators of crop pests and stimulating the presence of pollinators.

For this to happen, the CAP legislative proposals need to put in place a holistic system which supports farmers, financially and technically, to embrace change. We consider that such a system should include: (1) Strengthening the conditionality requirements; (2) Creating effective eco-schemes that encourage farmers to take a first step towards changing their farming practices through specific yearly commitments and (3) Designing more long-term rural development measures that follow-on from eco-schemes. Under this step-by-step approach, obligatory measures are combined with voluntary measures with increased levels of ambition.

At the same time, to ensure that the New Delivery Model (NDM) functions properly in measuring the performance of the CAP, it is crucial to create and improve indicators measuring its effects on nature. We need to be able to assess the effects of the agricultural transition that we are calling for.

A. Conditionality

1. General observations

The AGRI Committee (hereafter COMAGRI) voted on 2 April 2019 to weaken the Commission's proposal on conditionality. We consider this unacceptable as it undermines the CAP's most wide-ranging tool to fight climate change and biodiversity loss – at a time when public opinion is demanding the opposite and public spending is under heightened scrutiny. In Article 12, COMAGRI voted in favour of allowing Member States (MS) to establish 'equivalent' practices to conditionality, moving away from a common set of rules for all EU farmers and thereby endangering the CAP's coherence and fairness.

2. Concrete demands

- COMAGRI voted in favour of removing the requirement of maintaining a proportion of agricultural area for “non-productive features” (GAEC 9). We call for that decision to be reversed and for at least 7% of agriculture area to be set aside for these areas, since they are

vital for reversing biodiversity loss and can, under certain conditions, improve a farmer's yields, by providing fodder for pollinators.

- Integrated Pest Management (IPM): We urge the incoming the COMAGRI to add Article 14 of Directive 2009/128 ('Sustainable Use of Pesticides Directive') to the CAP's Statutory Management Requirements (SMRs), so that all farmers are required to follow IPM principles, which can be expected to have beneficial effects on biodiversity.
- Farmers should be obliged to keep records on pesticide use that can be compiled by national authorities. This can be achieved by adding Article 67 of Regulation 1107/2009 (on the placing of plant protection products on the market) to the SMRs.
- Crop rotation: We call for a 4-year crop rotation including a leguminous crop on all arable land. The various benefits of crop rotation are well-established in terms of improving soil health and reducing the need for pesticide use. Including leguminous crops in rotation is crucial to reduce the EU's 'protein deficit' for livestock and to stimulate human consumption of legumes.

B. The CAP's Specific Objectives and Related Indicators

1. Pollinators

The current CAP lacks sufficient indicators, in quality and quantity, to measure its effects on biodiversity. We therefore strongly support COMAGRI's inclusion of a new impact indicator on pollinators (I.20a), since these are an excellent proxy for the state of biodiversity in the countryside - the perfect link between nature and agriculture. Indeed, bees are key agricultural agents which, via a Pollinators' Index, can provide essential insights to assess: (1) pollination services and (2) environmental quality and the effectiveness of the implementation of the CAP objectives. For instance, sampling analyses of pollen or wax can provide precise data on biodiversity and pesticide use.

2. Pesticide Use

COMAGRI has placed "reducing chemical dependency" in the Article 6 objectives, which we welcome. It has also strengthened the wording of impact indicator I.27 on use of pesticides. We call for this to become a real indicator measuring reductions in pesticide use, at least for a number of key crops. The Sustainable Use of Pesticides Directive, adopted 10 years ago (!), made it mandatory for Member States to support the uptake of Integrated Pest Management in farming. With the New Delivery Model now centred on measuring performance, we call for robust indicators for accurate monitoring of pesticide use in the EU.

3. Agrobiodiversity

We welcome COMAGRI's decision to include "agrobiodiversity" to the CAP's specific objectives (in Article 6). This term means for us cultivating both a greater diversity of plant species and a greater diversity of varieties within those species. It is an important element in the transition to a more sustainable agriculture model, a process which requires making available to farmers seeds and plants resulting from natural or human selection, that require less inputs (fertilisers and pesticides) and are better adapted to the local climate, soils and conditions of production. These can be older crop varieties

or newly developed ones, but will have a different and more varied genetic composition to those widely-used today. We therefore call for the creation of a Agrobiodiversity Index in the EU as an impact indicator.

Such indicators are just a start; additional data will be needed to measure the effectiveness of the CAP and the achievement of other specific objectives, i.e. to monitor fields such as soil biodiversity for which very little information is currently available.

C. Eco-Schemes

- The ‘eco-schemes’ referred to in Article 28 of the CAP Strategic Plans’ proposal are the key tool proposed by the Commission to truly support an agricultural transition. We call on COMAGRI to work closely with the ENVI Committee (hereafter ‘ENVI’) to ensure that eco-schemes pursue similar levels of ambition in all MS. The ENVI text is more convincing in this regard, requiring the Commission to approve complementary national schemes. ENVI also rightfully emphasizes the need for close cooperation between the Commission and national authorities in devising such schemes.
- Eco-schemes must encourage farmers to grow more genetically diverse or traditional crops, including more leguminous crops which are currently less known in the market, favouring the ecological transition towards a chemical-free agricultural sector.
- We also call for the creation of a Pollinator Eco-Scheme, supporting farmers to cultivate plants providing resources to pollinators, with proven melliferous and polliniferous capacities and with prolonged flowering periods (e.g. oilseeds, pulses, etc.), among other measures.
- Given these needs, we support earmarking 30% of First Pillar funding to eco-schemes, as called for by the ENVI Committee. This budget must be spent on schemes with a clear impact, rather than on ‘greenwashing’ or on obligations previously included in conditionality.

D. Apiculture Sector

Work undertaken by COMAGRI recognises the importance of beekeeping - a small but emblematic sector in the EU. The beekeeping community appreciates such recognition. However, we would like to underline that the CAP needs coherence. Allocating increased funding for the renewal of bee colonies that are declining due to an unhealthy or poorly biodiverse environment is not a long-term solution to the sector’s problems.

E. Wine Sector

EU support for the wine sector should concentrate on supporting chemical-free production methods and encouraging use of greater genetic diversity in grape varieties. This would save farmers money, as they are currently obliged to spend heavily on pesticides and fungicides, as well as meeting growing consumer demand for more ‘natural’ or healthier wines. For these reasons, in the Common Market Organization (CMO) file, we urge COMAGRI to allow cultivation of a greater diversity of grape varieties

– as proposed by the European Commission - including new varieties resulting from breeding with non *Vitis vinifera* grapes.

F. Farm Advisory Systems (FAS)

We call for an EU role in guaranteeing minimum common quality standards for Farm Advisory Systems (FAS), including guarantees of independence, as supported by ENVI. Proactive advisory services are needed to help farmers engage in the ecological transition.

G. Governance, Transparency

The NDM allows Member States greater freedom to make policy choices and underlines the importance of measuring real performance on the ground. Civil society actors, as well as state authorities outside of the traditional agriculture ministries, can make a vital contribution to this approach; we therefore call for the delegated act foreseen in Article 94 to create a real partnership based on the effective participation of all interested parties. We call on COMAGRI to support the idea of making CAP Strategic Plans public at the draft and final stage: how else can the public opinion be expected to make its voice heard on how our food is grown, a subject that it is increasingly passionate about? All citizens have a right to know about how public money is spent to support agriculture.

They also have a right to know about the effects of agriculture policies, which is why we need clear indicators providing reliable data on what is happening on the ground, notably on biodiversity and pesticide use.

About ARCHE NOAH:

ARCHE NOAH (Noah's Ark) is a seed savers' association based in Central Europe. With over 17.000 members and supporters, we have over 25 years' experience in the conservation, development and promotion of crop diversity. In our offices in Vienna and Brussels, we work for policies that support a more biodiverse, sustainable agriculture.

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About BeeLife:

BeeLife European Beekeeping Coordination is an association formed by professionals of the beekeeping sector from different countries of the European Union. Its main activity is the study of the impact on bees of environmental threats such as pesticides, climate change or genetically modified organisms (GMOs). BeeLife works for the protection of bees and biodiversity through its network of over 20 beekeeping associations from several countries of the EU.

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About PAN EUROPE:

Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together consumer, public health, environmental organisations, and women's groups from across Europe. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives.

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