



**Pesticide
Action
Network**
Europe

Brussels, 5 February 2024

Subject: The Commission's proposal to extend Derogations to GAEC 8 under CAP will not truly support farmers, and further harm biodiversity and citizens

Dear Ministers,

We write to you to express our deepest concerns regarding the proposal of the Commission to further extend the derogation to GAEC 8 under the Common Agricultural Policy (CAP). **Granting this derogation would go directly against farmers', citizens' and future generations' interests. Preservation of biodiversity in agricultural areas, which has been collapsing at an alarming rate^{1,2,3}, is key to preserving the ecosystem services on which farming fully depends.**

The war in Ukraine, food security as well as challenges farmers are facing, have been put forward as arguments to further extend the derogation on GAEC 8. It is clear that these arguments are unfounded. **We fully acknowledge that farmers are exposed to significant challenges. However, this proposal is not in the interest of farmers. It is a 'poisoned gift'.** Using ecological areas to produce will not lead to more resilient agriculture, on the contrary. The proposed action creates a conflict with their core resource, nature. A case study in Austria⁴ found that the suspension of CAP environmental requirements, granted under the pretext to safeguard food security, made no discernible contribution to food security. Mostly maize, soy and oilseed sunflower were grown. On the other hand, the suspensions have been detrimental to the environment, harming essential ecosystem services such as pollination and natural pest control.

Scientists⁵ underline that restoring nature and reducing the use of agrochemicals is essential for maintaining long-term production capacity, and increasing resilience of agriculture against climate change. Studies have shown that non-productive features/areas should at least cover 10% of agricultural land, to effectively support biodiversity⁶. The Commission proposes that nitrogen-fixing crops and/or catch crops can replace ecological areas. However, nitrogen-fixing crops and catch crops are not a valid alternative for ecological areas, as they have no significant benefits for the protection of biodiversity.

Flower strips, hedges and other landscape features are **vital to sustain biodiversity in agricultural areas. They are needed to foster pollination, natural pest control, erosion management, soil health and increase resilience against extreme weather events,**

¹ [Hallmann et al., 2017](#). More than 75 percent decline over 27 years in total flying insect biomass in protected areas

² [Brühl et al., 2021](#). Direct pesticide exposure of insects in nature conservation areas in Germany

³ [Rigal et al., 2023](#). Farmland practices are driving bird population decline across Europe

⁴ [Agricultural production on fallow land is harmful for bees, birds, soil and the climate. End of EU derogation demanded.](#)

⁵ [Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law](#)

⁶ [Action needed for the EU Common Agricultural Policy to address sustainability challenges. Impact of landscape improvement by agri-environment scheme options on densities of characteristic farmland bird species and brown hare \(Lepus europaeus\).](#)

exacerbated by climate change. Many studies, projects and farmers⁷ have shown that the increase of natural features in agricultural landscapes greatly contributes to the overall resilience of cropping systems against pests. Increasing natural enemies allows, for example, to drastically reduce pesticide use. **The proposal to grant a further derogation for GAEC 8 shows a lack of acknowledgement and appreciation for farmers who have been strengthening landscape features and biodiversity on their farms, reducing pesticide use, and increasing the delivery of public goods.**

Preserving and restoring natural features in agricultural areas is not only key to transition to resilient, sustainable cropping systems, it is also an essential obligation towards citizens and future generations. Citizens have repeatedly emphasised the need for sustainable food production and nature protection. Their voices can not be ignored by policy makers. Biodiversity and ecosystem services are common goods. Policy needs to protect and enhance natural resources and ecosystem services in agricultural areas, which cover almost 40% of the EU. Moreover, citizens pay for agriculture; about one third of the EU public funds goes to agriculture. **This public money should be used to protect, not deteriorate, citizens' health and public goods.**

Harming the public interest, and going against the goals of the agreed Green Deal and Farm2Fork Strategy, goes directly against EU values. The OECD⁸ has stressed that the CAP urgently needs to link funds to public goods, such as biodiversity conservation, habitat restoration and other ecosystem services. The same has been repeatedly stressed by different EU bodies. Also Commissioner Wojciechowski underlined robust arguments against abandoning the GAEC 8 requirement during the AGRIFISH Council in November 2023. **The proposal of the Commission seems to be an impulsive decision, an attempt to give the impression to address the current difficult socio-economic situation of farmers. Addressing a serious issue with wrong solutions that contradict policy, economic and scientific recommendations is not acceptable.**

We respectfully ask you to take into account the above, and to not support a further derogation for GAEC 8.

Yours sincerely,

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⁷ [High effectiveness of tailored flower strips in reducing pests and crop plant damage, Field Margin Strips \(Netherlands\), Flower-strip agri-environment schemes provide diverse and valuable summer flower resources for pollinating insects, IPM Works](#)

⁸ [Agricultural Policy Monitoring and Evaluation 2023](#)