

**Subject: Future Common Agricultural Policy**

Dear Ministers,

In light of current discussions within the AGRIFISH Council on the future of Agriculture in Europe, we write to you to share our views on the needed transformation to resilient, nature-inclusive and sustainable agricultural systems. Within the framework of the consultation on the Strategic Dialogue on the future of EU Agriculture, we have also submitted our contribution in April 2024.

Agriculture is a main driver of the biodiversity collapse, the climate crisis and water, air and soil pollution. At the same time, agriculture is heavily impacted by the triple planetary crisis, which poses a threat to food security and to farming. Pesticide and fertiliser use have been identified as important factors of biodiversity decline and pollution<sup>1</sup>. Pesticide exposure has been linked to an increased risk for a variety of health conditions. In France, Italy, the Netherlands and Germany, Parkinson's disease is recognized as an occupational disease for farmers. The profession of farming, and living in the countryside, have lost their healthy connotation. At the same time, farmers often lack the needed framework, such as independent advisory systems, to implement sustainable practices.

The Farm to Fork Strategy, part of the European Green Deal (EGD), was launched to tackle above-mentioned challenges. The strategy aims to make food systems fair, healthy and environmentally-friendly. The implementation of the EGD, by implementing or relaunching the Nature Restoration Law, the Sustainable Use of Pesticide Regulation, the Soil Monitoring Law and the Framework for Sustainable Food Systems, is essential. Slowing down needed measures will only exacerbate current challenges, and make future actions more difficult. The recent drastic cutting in the, already too weak, environmental conditionality of the Common Agricultural Policy (CAP), took the direct opposite direction of what is urgently needed<sup>2</sup>. This while no impact assessment or robust stakeholder assessment was carried out.

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<sup>1</sup> [Our global food system is the primary driver of biodiversity loss, European climate risk assessment, EEA, 2024](#), [More than 75 percent decrease in total flying insect biomass over 27 years](#), [Direct pesticide exposure of insects in nature conservation areas in Germany](#), [Farmland practices are driving bird population decline across Europe](#), [How pesticides impact human health and ecosystems in Europe](#), [Pesticides and Soil Invertebrates: A Hazard Assessment](#), [Pesticide effects on soil fauna communities—A meta-analysis](#), [Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law](#)

<sup>2</sup> [Subject: The attack of the Commission on the environmental conditionality of the CAP is undemocratic, outrageous, and threatens the legitimacy of the CAP.](#)

## The Common Agricultural Policy (CAP) counteracts its objectives

The current CAP is failing to meet its objectives, unfit for purpose and in urgent need of a thorough structural transformation. The EU agricultural sector is supported by significant public funds: the budget comprises about one third of the total EU budget, amounting to €386.7 billion euros of taxpayers money for the 2021-2027 period<sup>3</sup>.

- About 80% of CAP funds is currently allocated to about 20% of EU farmers, with the latter owning the largest agricultural holdings<sup>4</sup>. The EU has lost 5.3 million farms over the last 15 years, or 1,000 farms a day<sup>5</sup>. Subsidies have not been proven effective in stabilising farmer's income.
- Multiple expert assessments have underlined that the CAP has failed to contribute to climate and biodiversity objectives. On the contrary, the CAP is supporting practices which exacerbate the biodiversity collapse and climate crisis. According to the Organisation for Economic Co-operation and Development (OECD)<sup>6</sup>, currently most of the **financial support comes in forms that reduce rather than enhance the sector's capacity to adjust to future crises, including climate change. The OECD stresses that the challenge does not lie in the availability, but in the distribution of funds.** Experts underline that these funds need to be urgently linked to environmental goals, ensuring public funds for public goods. The European Court of Auditors concluded that the CAP fails to protect and restore soil health<sup>7</sup>. A recent Nature publication finds that over 80% of EU's Common Agricultural Policy supports emission-intensive animal products<sup>8</sup>.

## A thorough and ambitious transformation of the CAP is key

The CAP funding scheme is in need of thorough reorientation, based on following principles:

- An urgent **phase-out of area-based income support**, currently the dominant funding scheme of the CAP.
- Provide increased **support during the transition to sustainable, resilient, nature-inclusive systems.**
- A **strong environmental conditionality/baseline**, encompassing implementation of existing legislation. For example, Integrated Pest Management (IPM) has been mandatory in the EU since 2014 under the Sustainable Use of Pesticide Directive (SUD) 2009/128/EC. IPM should therefore evidently be a baseline condition for receiving agricultural subsidies.

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<sup>3</sup> [Financing of the CAP: facts and figures](#)

<sup>4</sup> [European Commission: Direct payment to agricultural producers - graphs and figures, 2022](#). URL: [e79f486d-cbd4-47a4-95f9-c4986e9dfaa9\\_en](https://ec.europa.eu/e79f486d-cbd4-47a4-95f9-c4986e9dfaa9_en) (europa.eu)

<sup>5</sup> [Farms and farmland in the European Union - statistics](#)

<sup>6</sup> OECD Report: [Policies for the Future of Farming and Food in the European Union](#) - OECD Report: [Agricultural Policy Monitoring and Evaluation 2023 - Adapting Agriculture to Climate Change](#)

<sup>7</sup> [EU efforts for sustainable soil management Unambitious standards and limited targeting](#)

<sup>8</sup> [Over 80% of the European Union's Common Agricultural Policy supports emissions-intensive animal products](#)

- **Remuneration of ecosystem services**, ensuring public money for public goods which go well beyond an environmental baseline.
- Public funds **should not support harmful practices**, such as practices which do not fully implement IPM (using pesticides only as a very last resort, if needed, and prioritising low-risk pesticides), the use of synthetic pesticides and candidates for substitution, practices undermining the move towards more plant-based diets and practices harming water quality, soil health and ecosystems overall (e.g. draining of peatlands and wetlands, conversion of grasslands, unsustainable irrigation, ...). Allocating funds to harmful practices is socially unacceptable and deletes the legitimacy of agricultural public funds. Public funds should only support practices which effectively contribute to reaching environmental, biodiversity and climate objectives, while ensuring the production of healthy food.

### **The CAP should support the establishment and the functioning of independent advisory systems**

To implement best available practices, based on principles of agroecology and integrated pest management, it is key that all farmers have access to high quality independent advisory systems. Those are foreseen in the SUD. Although advisory systems are mandatory under the current CAP, in practice many farmers do not have access to high quality advisory systems. Advisory systems are often closely linked to the agro-chemical industry, and unequipped to provide expert independent advice on, for example, integrated pest management. Projects in which regional alliances among farmers are set-up and well coordinated, for example through the EU-funded project IPM works<sup>9</sup>, have been shown very successful in implementing IPM, and reducing pesticide use.

### **The CAP should ensure effective and transparent implementation and enforcement**

Considering the colossal amounts of public money invested, CAP measures and support schemes should be result-based. Binding targets and robust impact indicators should be set. Data on applied practices (IPM measures) and used inputs, such as pesticide use, should be publicly available at farm level, as well as data on progress towards targets. An effective system of enforcement, control and sanctioning should be established, to ensure accountability and maximise the impact of CAP public funding. Due implementation of measures and legislation can only be ensured by proper control mechanisms, which will require an increased capacity of national and EU level authorities.

### **The CAP should provide a fair and healthy socio-economic framework**

- The CAP should foster the consumption of healthy, sustainably-produced food.
- All players in the supply chain should be bound to environmental and social obligations and targets, to ensure coherence, fairness and effectiveness.
- Trade policies must prevent unfair competition, and must secure equal environmental, social, health and animal welfare standards.

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<sup>9</sup> <https://ipmworks.net/>

## **Many farmers are already leading by example**

Many farmers across Europe already show that implementation of nature-inclusive and sustainable practices is possible, and increases resilience of cropping systems. The use of robust varieties, providing space for functional biodiversity, crop rotation and strip cropping, diversification (e.g. agroforestry) and permanent soil cover greatly decrease the vulnerability of agricultural systems and the dependency on inputs, such as pesticides and fertilisers<sup>10</sup>. Improving soil health, protecting water quality, enhancing water infiltration and enhancing natural enemies of crop pests, as well as pollinators are prerequisites to maintain healthy cropping systems.

## **Gaps in pesticide risk assessment and authorisation need to be addressed**

The current system of pesticide authorisation is failing to meet its purpose, leaving farmers, citizens and ecosystems insufficiently protected. It is key that the shortcomings in pesticide risk assessment, among more related to objectivity, transparency and the use of independent science, are addressed<sup>11</sup>. For example, environmental effects, cocktail effects, brain development effects and long-term effects of pesticides-formulations are not or insufficiently covered. It is essential that the EU pesticide Regulation (EC) 1107/2009 is fully implemented, and that its requirements regarding pesticide authorisations are met.

## **Transformation of food systems has wide societal support**

Through several public consultations, opinion polls and European citizens initiatives, citizens have expressed their high concern about the immense impact of agriculture, including pesticide use, on the collapse of biodiversity, the climate crisis, environmental pollution and health<sup>12</sup>. Through the European Citizens Initiative *Save Bees and Farmers*, more than 1 million citizens asked for the phasing out of harmful pesticides, and to support farmers in this transition. All the ingredients - knowledge, expertise, incentives and support - are available to make the, long overdue, transformation to future-proof and thriving agricultural systems.

Thank you very much for your time and consideration.

Sincerely,

Kristine De Schampelaere, Policy Officer Agriculture, PAN Europe

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<sup>10</sup> [Chapter Six - Diversifying crop rotations enhances agroecosystem services and resilience. The effect of crop rotations on soil, Landscape features to improve pest control in Agriculture, F. Wäckers: Making EFAs work for farmers and biodiversity](#)

<sup>11</sup> [Gaps in the EU pesticide Authorisation](#)

<sup>12</sup> [Joint letter to the EU Commission against the loosening of the CAP's environmental conditionality \(2024\)](#), [IPSOS Citizens Poll on Pesticides \(2023\)](#), Through the ECI '[Save Bees and Farmers](#)', citizens asked again for ambitious pesticide reductions to protect health, environment, biodiversity, long-term food security and long-term perspective for farmers. Of the 10 successful ECI's that have been submitted to the European Commission, 2 focused on pesticides., The final report of the [Conference for the Future of Europe](#) included the need for high environmental ambition in food production systems, and to drastically reduce pesticide use (2022), The [Eurobarometer survey on Food safety](#) in the EU listed pesticide residues in food as the most frequently selected concern related to food safety (2022), [EU public consultation on the Common Agricultural Policy](#): respondents showed a concern for environmental challenges, such as the prevention of biodiversity loss and prevention and reduction of water pollution (pesticides, fertilisers) (2017) , More than 1 million citizens asked the European Commission and the Member States for a ban on glyphosate and ambitious pesticide reductions, through a successful [ECI for a ban on glyphosate](#) (2017)