Contribution to the debate on the Commission Communication on the Future of food and farming in the Agriculture Council on 29th January 2018

Briefing, 26th January 2018

Following the publication of the Communication “The future of Food and Farming” by the European Commission, Agriculture and Fisheries Council will hold series of debates based on the questions prepared by the Bulgarian Presidency. BirdLife Europe and the European Environmental Bureau (EEB) provide their views on the issues debated during the 29th January Council.

1 - How can we ensure continued and enhanced added value of the CAP for farmers, rural communities and citizens after 2020? What would be the key objectives that we should set at EU level in order to achieve that?

A basic prerequisite for achieving EU added value from CAP spending should be to acknowledge the seriousness of the environmental crisis affecting European farmland, from the collapse of biodiversity to the exhaustion of soil and water resources. This crisis is a real threat for farming activity in the long run and our food security. The assumption, that the CAP already “protects water, soil, biodiversity and landscape and provides tools to mitigate and adapt to climate change”, flies in the face of overwhelming scientific evidence. For a new more ‘results driven’ CAP to deliver EU added value and to succeed, it must be based on an honest assessment of the scientific evidence, in particular with regards to the environment.

Additionally, the 2017 CAP consultation showed that citizens (80%) and farmers (more than 60%) are demanding a CAP that delivers more for the environment and climate. In order to be achievable and traceable, environmental objectives must be strong and very clear at EU level, covering biodiversity, soil, air and water. Ambitious climate adaptation and mitigation objectives must also be covered but separately from environmental objectives, so that each of the crises affecting European farmland can be addressed. What’s more, all environmental and climate objectives and targets should be ‘proofed’ against each other, so that they do not lead to trade-offs. There is already clear evidence of various good farming practices that are readily available and that could be incentivised by the CAP, such as crop rotation, restoration of landscape elements, water saving technology, agroforestry, organic farming
etc. All measures should be accompanied with measurable targets and indicators agreed at EU level.

Environmental objectives should at the very least be based on relevant EU legislation, and the associated targets and indicators must be shown to contribute towards meeting the binding overarching objectives and beyond.

Given the extreme crisis of farmland biodiversity, and the potentially catastrophic impacts of climate change for farmers, to achieve the objectives in these areas specific ring-fencing and separate funding should be earmarked for both biodiversity and climate change.

2 - What should be the adequate level of the proposed increase in subsidiarity for the different policy instruments (i.e. direct payments, market measures, environmental elements, rural development) in order to maintain the common character of the CAP while allowing Member States flexibility? Do you consider the proposed Strategic plans an adequate instrument to implement the increased level of subsidiarity and what would be the essential parameters for it to fulfil this role?

Subsidiarity should apply to the ability of Member States and regional and local authorities to choose and design the appropriate schemes for reaching each objective. However, such increased subsidiarity must come with much improved governance and accountability to ensure that EU level objectives are achieved, and to prevent a race to the bottom and unfair competition between MS and regions- eventually assuring that the CAP EU added value is protected and that we have a level playing field.

Key elements of such improved governance should be:

- Each scheme should be approved ex-ante by the Commission, on the basis of a detailed intervention logic backed up by scientific evidence, which can then be monitored on the basis of experimental (scientific) design.
- In order to be efficient and effective, national environmental authorities must be fully involved in the environmental part of national/regional CAP programmes.
- Effective incentive and disincentive mechanisms should be put in place to ensure that all MS play by the rules and honestly pursue the agreed objectives.
- While specific targets would need to be designed by Member States, overall approach indicators and quality assurance should be standardised at EU level and closely monitored by the EU Commission, in order to maintain the common nature of the policy.

Such improved governance must cover all CAP tools, in order to ensure full coherence of the policy. Effective safeguards must be built to prevent any MS or region from unduly subsidise specific sectors thereby undermining the common market.

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