What is at stake
The transformation of the agricultural sector is critical in order to increase the positive impacts that agricultural production has on the climate, the environment, biodiversity, animal welfare and human health, and in turn avoid the negative impacts. There is a critical need for policies that accelerate these changes. This was the conclusion of the wide stakeholder group - Commission on the future of agriculture (Zukunftskommission Landwirtschaft) in 2020. But still, the government is not acting in a sufficient way. The German CSP includes some positive elements that can incentivize positive change but falls short of being the vehicle for transformative change and won’t help solve the nature, climate, and biodiversity crises.

What is wrong with the German CSP

- **There is an inadequate budget to create sufficient space for nature on all farms:** According to science, at least 10% of non-productive features are needed on a farm level to bring back biodiversity. The CSP budget will only allow the creation of 6.4% of arable land, which is far from what is needed and what Germany signed up to in the EU Biodiversity Strategy to 2030.

- **Most eco-schemes fail to bring environmental benefits:** 4 out of the 7 eco-schemes won’t result in any positive change, and will only support standard practices and support the existing system.

- **There is an insufficient budget to support organic farming:** Germany is committed to reaching a 30% organic farming target by 2030. Sadly, unless the CSP invests in reaching this target, it will not become a reality.

- **Failure to support the transition towards pesticide-free agriculture:** The aim of the Farm to Fork Strategy to reduce the use of crop pesticides and the resultant risks by 50% by 2030 will not be achieved with the current draft, as there is a lack of attractive measures.

- **Failure to protect water bodies from nitrates:** Germany faces an infringement from the EU for exceeding nitrate levels in water. The new CSP fails to use available instruments (e.g. wide enough buffer strips under conditionality, voluntary measures supporting reduction of fertiliser) to act on this serious environmental problem impacting society at large.
This is how the German CSP can help the transition to sustainability

- **Put in place adequate measures and budget for those measures contributing to reaching the Farm to Fork targets.**

- **Put in place a strong baseline for all CAP payments**, in particular, GAEC 2 (efficient protection of wet-and peatland according to the requirements of climate protection), GAEC 4 (buffer strips on water bodies must be at least five metres wide to protect water from nitrate pollution), and GAEC 8 (no exemptions for grassland and small farms, increase from 4 to 5% obligatory non-productive landscape features).

- **Allocate significant budget and attractive payments for eco-schemes that are likely to deliver for biodiversity, soil, water, and climate.** For example, eco-scheme 1 is meant to support the 10% non-productive features target. Therefore the budget must be increased. A ban on seeding in fallow land and support for perennial instead of annual flowering strips are needed to make it ecologically worthwhile. Eco-scheme 6 is intended to provide an incentive for foregoing crop pesticide use. The premium for that is far too low and winter crops are excluded- but they take the biggest share in German agriculture.

- **Allocate a sufficient budget for the organic farming sector.** There is a need to increase the budget for reaching the goal of 30% organic farming by 2030 by the new German government. In fact, the budget given by the federal states can just afford a share of 14% of farmland (which is only +4%). This financial gap needs to be filled immediately.

- **Protect grassland:** Germany is facing an infringement case due to the loss of species-rich grassland (habitat type 6510 and 6520). Therefore it is necessary that all federal states have agri-environmental measurements to protect grasslands with either identification type plants or reduced mowing (1-2 cuttings per year) and reduced fertilisation (60 kg N per year).