Brussels, 8 April 2024

Subject: The attack of the Commission on the environmental conditionality of the CAP is undemocratic, outrageous, and threatens the legitimacy of the CAP.

Dear Member of the European Parliament,

We, the 52 undersigned organisations, write to you regarding the Commission's attack on the environmental conditionality of the Common Agricultural Policy (CAP), which is outrageous and unacceptable. The Commission is fast-tracking decisions based on election fever, promoting a hatchet job trick by the European People's Party (EPP). The EPP is forcing a last-minute, no-negotiation opening up of a law for which they themselves were responsible for negotiating. **The actions show a scandalous disregard for democracy and due democratic process, citizens, science and farmers. At the same time, the actions are a departure from predictable, consistent, and coherent policy-making**: deleting ecological elements of the CAP, now proposed at lightning speed, is diametrically opposed to the goals of the Farm to Fork Strategy. The Commission presented the Farm to Fork strategy shortly after taking office as a central element of its Green Deal, to address the climate and biodiversity crisis. This departure from reliable decision-making poses a fundamental threat to the credibility of EU policy-making overall. Citizens rightly expect political decision-makers to make scientifically based and reliable decisions in the public interest. **Therefore, we urgently ask you to take your responsibility and reject the Commission's proposal. Public funds should be steered to nature- and climate-friendly practices with clear added societal value, and should be linked to ambitious result indicators, targets and timelines.**

The Commission's proposal published last week weakens or makes voluntary the 'Good Agricultural and Environmental Conditions' (GAECs), which are currently good farming practices, most in place since either 2013 or 2003, that farmers must fulfil in order to receive full payment of agricultural subsidies. On March 15, the Commission announced a proposal to delete or weaken GAEC 5 (minimise tillage to prevent soil erosion), GAEC 6 (ensure minimal soil cover), GAEC 7 (crop rotation), GAEC 8 (areas to enhance biodiversity) and GAEC 9 (protection of permanent grassland in Natura 2000 areas). In addition, the Commission proposes that Member States are no longer required to align CAP strategic plans with the latest environmental policies. **In breach of its own rules on good lawmaking, no impact assessment was carried out, and the Commission has no data to back up its proposal.**

For multiple reasons, the actions of the Commission are unacceptable:

- **The Commission doesn't address the actual problems of farmers, but instead resorts to handing out poisoned gifts steered by election fever, at the expense of current and future generations**. **Many farmers, including some farming organisations, have stated they don't ask for lowering environmental rules;** Instead, they want to be enabled to face and address environmental challenges. They ask for the right supportive framework while redirecting to climate resilient and

sustainable practices, fair support for provision of public goods, a decent living, a strengthened position in the value chain, and a level playing field regarding environmental, health, social, safety and animal welfare standards for international trade. Fairer distribution of CAP funds, linked to environmental goals and public goods, is essential, given that momentarily 80% of funds are allocated to 20% of farmers. The whole food chain, also food processors and retailers, need to be engaged to meet environmental objectives.

- **The Commission ignores the scientific consensus that the biodiversity collapse and climate crises are the biggest threats to farming and require urgent actions to avoid catastrophic consequences; the good farming practices targeted are actually climate adaptation measures**. We need to urgently tackle both the major contributions of agriculture to the climate crisis, environmental pollution and the collapse of biodiversity, and their effects on the ability to keep farming and food security. Not moving towards future-proof practices is not an option, and will only increase the burden on society and farmers. Just recently, the European Environment Agency (EEA) published the EU climate risk assessment. The report underlines the high climate risks threatening Europe's ecosystems, environment and food security.

- The Commission claims 'political urgency' to justify a complete lack of impact assessment and adequate stakeholder consultation. According to the Commission, tractors blocking streets are a reason to throw overboard essential environmental requirements, linked to one third of the EU budget. The GAECs comprise much needed good practices which have been in place for up to 21 years. Deleting them won't tackle current challenges, it will exacerbate them. **There is no proven political urgency, and certainly none to justify a far-reaching attack on environmental conditions of the CAP. The lack of good governance, transparency and participation of all affected stakeholders is beyond belief.**

- **The Commission goes against all expert assessments which stress CAP funds should as a matter of urgency be better linked to public goods and to climate, environmental and biodiversity objectives.** Years of work in establishing a conditionality baseline, including by their own experts, seem to be irrelevant to the Commission. The Commission goes directly against its own Farm to Fork and Biodiversity strategies which acknowledged the urgency of the climate and biodiversity crises, and related challenges in the food sector.

- **The CAP budget comprises one third of the EU budget, and amounts to €386.7 billion euros of taxpayers money for the 2021-2027 period. It is socially unacceptable, and questions the legitimacy of the CAP, to not link ambitious environmental requirements, needed to tackle the climate and biodiversity crises, to receiving subsidies.** As recently stressed by the OECD, currently most of the support for the sector comes in forms that reduce rather than enhance the sector's capacity to adjust to future crises, including climate change.

- **Removing essential and basic good practices, such as crop rotation, providing space for biodiversity, minimal soil coverage, etc. severely increases the vulnerability of cropping systems to extreme weather events and pests, and to increased pesticide dependency.** These practices are essential parts of Integrated Pest Management (IPM) which is mandatory in the EU since 2014 through Directive 2009/128/EC. Deleting these practices from the CAP conditionality will lead to an even

weaker implementation of IPM. The deletions of cover crops and leguminous crops within GAEC 8 would lead to the loss of more than 9 million hectares of pesticide-free areas (based on 2019 figures for Ecological Focus Areas).

- **The actions show a severe disrespect and neglect for the interest and demands of citizens**. **The Commission seems to find that public consultations and European Citizens' initiatives, in which citizens express the urgent need to decrease the major environmental impact of agriculture, are irrelevant.** The wishes of the millions of citizens who signed multiple ECIs on sustainable farming are being completely ignored, while tractors blocking streets, burning tires and spraying slurry inspire the Commission to take undemocratic and irresponsible actions which won't help farmers.

We further elaborate on these points in the Annex accompanying this letter. **It is incomprehensible that the Commission undermines its own Farm to Fork, Biodiversity and Soil strategies, boycotts farmers' adaptation to climate change and long-term perspectives, and takes actions against the public interest.** Farmers in their fields across Europe are showing that enhancing crop rotation, soil health, ecological infrastructure and biodiversity can significantly lower pesticide dependency, enhance water infiltration, decrease drought stress and erosion. Sustainable practices ensure stable yields, even in the short term.

Agriculture is one of the main drivers of the biodiversity collapse, climate crisis and environmental pollution. Farmers are also strongly impacted by climate change, biodiversity loss and environmental pollution, including pesticide use. They need the right supportive framework and clear policy signals to adopt needed practices. By going directly against its own strategies and objectives, the Commission is betraying European citizens and farmers. **Not linking ambitious environmental requirements and targets to agricultural subsidies, which comprise one third of the EU public funds, would delete the social acceptability and legitimacy of the Common Agricultural Policy. For all the above-mentioned reasons, we urgently ask you to take your responsibility and to reject the Commission's proposal to weaken or delete environmental requirements of the CAP.**

Yours sincerely,

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Annex

1. **All scientific recommendations underline the urgent need to tackle the major contributing factor of agriculture to the climate crisis, environmental pollution and the collapse of biodiversity**

Scientists have warned that, given the different environmental crises we are in, it is extremely urgent to move towards climate-resilient, nature-inclusive and sustainable agricultural practices. Agriculture is also one of the sectors most directly impacted by climate change. Not making needed steps will have catastrophic consequences and further increase the burden on society and farmers. Just recently, the European Environment Agency (EEA) published the EU climate risk assessment. The report underlines the high climate risks threatening Europe's ecosystems, environment and food security. It pointed out that the CAP does not sufficiently address major climate risks and adaptation needs in their implementation. This was also acknowledged by the EU through the Farm to Fork, Biodiversity and Soil Strategies. It is incomprehensible that the Commission undermines its own strategies and sabotages farmers' adaptation to climate change with actions which pose a threat to food security.

Ref: European climate risk assessment, EEA, 2024

2. **There is no proven 'political urgency' to justify an attack on the environmental conditionality of the CAP**

The Commission states that "*with a view to the political urgency of tabling this proposal, which aims to respond to a crisis situation in EU agriculture, no impact assessment has been carried out, as foreseen in Tool #1 of the Commission's 'better regulation' guidelines that stipulates the importance of their flexible and proportionate application.*" **However, there is no proven political urgency, and certainly none to justify undermining environmental conditions of the CAP**. The good environmental and agricultural conditions are not the cause of a political urgency, or challenges in the agricultural sector. All but one GAECs have been in place since 2013, most since 2003, 21 years, and hence can't be the cause of a sudden political urgency. On the contrary, environmental conditionality is a key to address the extremely urgent climate and biodiversity crises. **The Commission gives the dangerous impression that blocking streets with vehicles warrants 'political urgency' and provides a free pass to take drastic measures which go against science and the public interest.**

Ref: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendments to CAP Strategic Plans, review of CAP Strategic Plans and exemptions from controls and penalties

3. **Expert assessments have been repeatedly stressing the need to link CAP funds to environmental objectives and public goods.**

The CAP has been failing to adequately tackle the environment, biodiversity and climate crises. During years of fraught and difficult negotiations, small but essential steps were taken in building a basic green conditionality for the CAP. However, most analyses conclude that much more ambition from the EU and member states is needed for the CAP to effectively contribute to environmental objectives. The GAECs need to be further enhanced, not abolished. It is incomprehensible that the Commission moves in the opposite direction of what is urgently needed. To protect ecosystem services, reach environmental goals, and give farmers a clear long-term perspective, a strong environmental conditionality is needed. Voluntary measures eligible for additional funding should go well beyond an ambitious baseline. Deleting or weakening basic environmental requirements or moving them to voluntary eco-schemes will result in even lower implementation of urgently needed measures by Member States, and will result in back-sliding, breaching article 105 of SPR.2021/2115; what is more, blank cheque basic CAP payments can not be counted towards climate or biodiversity expenditure, with potential for WTO challenges. In 2023, the OECD concluded that most of the support for the agricultural sector comes in forms that reduce rather than enhance the sector's capacity to adjust to future crises, including climate change. The OECD underlined that agricultural subsidies should be performance-based, and a larger share of the funds should be dedicated to remuneration of public goods such as environmental and climate protection.

Refs:

- ECA, 2021: Common agricultural policy and climate: half of EU climate spending but farm emissions are not decreasing: "*We found that the €100 billion of CAP funds attributed to climate action had little impact on such emissions, which have not changed significantly since 2010. The CAP mostly finances measures with a low potential to mitigate climate change. The CAP does not seek to limit or reduce livestock (50 % of agriculture emissions) and supports farmers who cultivate drained peatlands (20 % of emissions);"*
- 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
- Fitness Check of the Common Agricultural Policy (CAP)
- Pe'er et al. A greener path for the EU Common Agricultural Policy
- Pe'er et al. EU agricultural reform fails on biodiversity
- Pe'er et al. 2020: Action needed for the EU Common Agricultural Policy to address sustainability challenges
- Pe'er elt al. How can the European Common Agricultural Policy help halt biodiversity loss? Recommendations by over 300 experts
- Naturefood: Kortleve et al., 2024: Over 80% of the European Union's Common Agricultural Policy supports emissions-intensive animal products

4. **It is socially unacceptable to spend taxpayer's money on harmful practices. It deletes the legitimacy of the CAP**

The CAP budget comprises one third of the EU budget, and amounts for the 2021-2027 period to €386.7 billion euros of taxpayers money. It is evident that these subsidies should be spent on practices which enhance and protect ecosystem services, and create clear social added benefits. The Commission sends citizens the signal that the Commission can spend

citizens' money how they wish, even without consulting them nor following due democratic process and the proper scrutiny needed for such important and sensitive laws, and by taking actions which go directly against scientific recommendations. It is socially unacceptable to spend taxpayer's money on practices which severely harm biodiversity, soil, water resources, long-term food security, and human health. Irresponsible spending of CAP subsidies, depriving the CAP from even the most basic environmental conditionalities, would delete the legitimacy of the CAP, risking increased calls for cuts in the CAP funding next MFF negotiation round.

Refs:

- Financing of the CAP: facts and figures
- 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
- Naturefood: Kortleve et al., 2024: Over 80% of the European Union's Common Agricultural Policy supports emissions-intensive animal products

5. **Removing essential good practices makes cropping systems more vulnerable to climate and pests, could lead to the loss of more than 9 million pesticide-free agricultural area (2019 figures)**

According to the latest publically available numbers from the Commission in 2019, there was more than 9 million hectares of pesticide-free Ecological Focus Area in the EU, in the form of so-called "productive EFA" - cover crops and leguminous crops. By removing the requirement to provide space for pesticide free biodiversity within GAEC 8 and not even proposing any compulsory eco-scheme to replace it, the EU will lose this pesticide-free agricultural area. This while through two European Citizens' initiatives, as well as through multiple consultations, citizens, farmers and scientists expressed the need for ambitious pesticide reductions, to protect our environment, biodiversity and health. The retraction of the SUR represented a black day in EU policy making, which let false narratives of the agro-chemical industry prevail over science and the public interest.

Not only would the proposals lead to a large loss of pesticide-free agricultural land, they would also lead to an increase in vulnerability against climate change and pests, and an overall further increase in pesticide use and dependency on costly external inputs. The deletion of mandatory crop rotation (GAEC 7), for example, would greatly increase the vulnerability of cropping systems, as crop rotation is needed to break pests' reproductive cycles. Removing space for biodiversity (GAEC 8), decreases space to foster natural pest control by beneficial species attracted to natural vegetation and especially wildflower strips - this has been shown to increase yields by up to +36%, even for wind-pollinated crops (+12%): even if they are wrongly labelled as "non-productive", these elements enormously contribute to productivity. Ensuring minimal soil coverage (GAEC 6) is essential against erosion, to stimulate nutrient cycling and organic matter, to increase weed suppression and water absorption. These practices are also essential parts of Integrated Pest Management (IPM), which is mandatory in the EU since 2014 through Directive 2009/128/EC and Reg.1107/2009. Deleting these practices from the CAP conditionality will lead to an even weaker implementation of IPM and drive further pesticide dependency with all its costs.

Weakening GAEC 9, which protects permanent grassland in Natura 2000, is also unacceptable, as it allows ploughing in Natura 2000 grassland, which has been designated by the MS themselves on the basis of exceptional species composition and biodiversity value: "*Experience*

has however shown there may be exceptional situations where such environmentally sensitive permanent grassland is damaged, for instance by predators or invasive species, and appropriate measures to address such situations, including exceptions to the ban on ploughing of the areas concerned, to restore such permanent grassland, may be necessary to ensure that the GAEC standard 9 requirements contribute to protection of habitats and species", the Commission's proposal states - yet it is ludicrous and scandalous to suggest predators damage to grasslands as an excuse to destroy valuable protected nature sites. It is unclear what is meant with "damage by invasive species", and it is evident that even invasive plants can and should be managed without ploughing up and destroying the most biologically and scientifically valuable grassland, in Natura 2000 areas. The site-specific management plan of each Natura 2000 site must always be respected. Historical permanent grasslands are among the most valuable habitats, and in many member states protection has already been significantly too weak.

The additional proposals in the non-paper of the Commission, which was kept hidden for the public, also include the very worrying deletion of the requirement that farmers must submit individual applications for aerial spraying of pesticides once relevant conditions are met, a requirement of the Directive on the Sustainable Use of Pesticides 2009/128/EC. Aerial spraying is linked to important risks for far drift of pesticides, leading to increased exposure of surrounding biodiversity and citizens. It is essential that every application is submitted, and that policy-makers and citizens have access to this information. The proposals also include the exempt pesticides containing only biological active substances from the record keeping obligations, amending Pesticide Regulation (EC) No 1107/2009. **It is essential that records are kept of all pesticide applications, in order to allow for monitoring of use and impact of pesticides**.

There is no guarantee that all the deleted or weakened GAECs will be covered by eco-schemes, as therefore it should be mandatory for all member states to establish eco-schemes which cover all these conditions, and to make it obligatory for farmers to take them on.

Refs.:

- 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
- 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

6. The actions show an appalling disrespect and neglect for demands of citizens

Through numerous platforms, citizens have been calling loudly for a redirection of agricultural practices and policies towards future-proof systems which protect health, environment and biodiversity. In a recent IPSOS Poll (2023), citizens from 6 member states across Europe clearly called for high environmental ambition in food production, as well as a strong environmental conditionality as a prerequisite to receive public agricultural funds. Up until now, European citizens who supported the European Citizens Initiative Save Bees and Farmers have been waiting for the Commission to answer their demands. Citizens watch in disbelief how blocking streets and ports, burning tires and spraying manure lead to (irresponsible) action of the

Commission, rather than urgent scientific recommendations and the public interest. A letter was sent to the European Commission, supported by 336 organisations, asking to not weaken the environmental conditionality of the CAP.

Refs.:

- 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 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)

7. **The actions ignore the actual challenges farmers are dealing with, and deprive farmers from a long-term perspective**

Most farmers protesting have pointed out the need for fair prices, strengthened position in the value chain, and a level playing field regarding international trade. **Many farmers, including some farming organisations, have clearly stated that they don't ask to reduce environmental conditionality.** All expert assessments underline that healthy ecosystems are the basis for sustainable food production. Instead of tackling the actual challenges, the Commission resorts to tactics to divert attention, by throwing overboard essential, basic environmental requirements. Many experts have pointed out that the CAP is in need of thorough reorientation. Subsidies need to be strongly linked to the remuneration of public goods. Currently, 80% of CAP funds goes to 20% of farmers, the largest holdings. The EU has lost 5.3 million farms over the last 15 years, or 1,000 farms a day. **If the Commission was serious about the challenges of farmers, it would address these key shortcomings**, through ring-fencing to ensure a fair distribution and a higher percentage of the budget allocated to farmers making effective efforts related to climate, environment and biodiversity.

Ref.:

- EU countries lose 5.3 million farms in 15 years

8. **By not carrying out an impact assessment nor a stakeholder consultation, the actions ignore procedural rules, further undermine democratic values, the credibility and reliability of the Commission and EU decision making.**

It is outrageous that the Commission pushes drastic and fast track measures bypassing any scrutiny, which go against all scientific advice, without carrying out an impact assessment. Deleting environmental basic standards poses great risks to our environment, health and long-term food security. In the framework of the current crises, the Commission can't afford to gamble with the capacity of our ecosystems to foster ecosystem services, including food production. The actions of the Commission concern the spending of about one third of the EU public funds, regarding issues with a very wide societal impact. The fact that scientists, citizens and many other relevant stakeholders were not even consulted, questions the legitimacy of the decision-making process, the democratic values of the EU and the credibility and reliability of the Commission and EU decision making.