

Mr Commissioner Janusz Wojciechowski

Ms Commissioner Stella Kyriakides

Mr Commissioner Virginijus Sinkevičius

Re: Making the approval process of the CAP Strategic Plans open and ambitious

01 September 2021

Honourable Commissioners,

The design and approval of the future 27 CAP Strategic Plans are decisive moments to demonstrate commitments towards a fairer, greener, and rural-proofed CAP reform at national and regional levels.

The European Commission and the Member States can rely on the expertise, knowledge, and motivations of a wide range of actors to ensure that the quality and level of ambition of the future CAP plans are high.

Farmers, agro-ecologists, public authorities, civil society organisations, researchers and citizens can all become **active actors** if the approval procedure between the Commission and the Managing Authorities is **open and ambitious**.

In this context, we coalitions from nine Member States – working closely with a wide range of stakeholders and organisations, including farmers' ones, and directly involved in the preparation of the respective national CAP Strategic Plans – demand the European Commission and the Member States set up an approval procedure to:

- **Enable the access to all draft or partial draft CAP plans** exchanged between the Managing Authorities and the Commission until their final versions/approval.
- **Receive the latest notifications on the state-of-play of the plans** (e.g. submissions, assessments, feedbacks, revisions, pending approval/rejection), as well as the contact information to reach out the European Commission's officers and [external assessment support](#) for queries and observations on the CAP Strategic Plans.
- **Independently assess the draft CAP plans, as well the quality of the Commission's approval procedure** (coherence, transparency, rigor, ambition).

To achieve these specific objectives, the European Commission's DG AGRI, DG ENV and DG SANTE, as well as national ministries with the shared competences on the Common Agricultural Policy should implement the following actions:

1. **Demonstrate how they will cooperate throughout the approval process**, for instance by presenting the timeline, sharing the best data and information on the drafted plans and creating common communication channels directly with the Member States.

2. **The national Monitoring Committees and Managing Authorities should be set up** before the submission of the CAP Strategic Plans to create effective governance arrangements in a timely manner.
3. **The tools to screen, assess, and approve the drafted CAP strategic plans should be published well in advance** (criteria, grids, guidelines, data sources), and engage citizens in this participatory process through the future CAP networks.
4. **The results of assessments of the submitted plans to the Commission should be published fully**, as should observation letters and recommendations given to modify and approve the draft CAP Strategic Plans. Particular attention should be given to the 'non-backsliding principle'; scientific justification to accept certain 'practices under eco-schemes'; the quality of ex ante evaluations and SEA; and the substantial contribution towards fairer CAP plans (e.g. definitions of active farmers, capping, redistribution, maximum level for the value of payment entitlements, convergence, social conditionality).
5. **A public communication channel should be created by the Commission and Member States** to allow civil society organisations, farmers, or researchers to send queries, prompt feedback, relevant data, or suggestions on the submitted materials.
6. **Identify the areas where decisions made in the National CAP Strategic Plans are lacking data and information** in order to improve their future planning, performance monitoring and evaluation.
7. **The Commission should collect and publish in one single portal all the final and full versions of the approved National CAP Strategic Plans in their national languages.**

An equal appraisal and rigorous approval of the CAP Strategic Plans should be implemented regardless of political power, timing of submissions, and delivery models across the 27 Member States.

To avoid the situation whereby granted flexibility to the Member States culminates in a race - to-the-bottom, we urge the Commission to set up this open procedure which promotes transparency, science, citizens engagement, and socio-ecological justice. We count on your actions.

Your sincerely,

**Austrian CAP Platform (Austria)**



**Agroecology in action (Belgium – Wallonia)**



**Society for Territorial and Environmental Prosperity, (Bulgaria)**

**Pour une autre PAC (France)**



**Cambiamo Agricoltura (Italy)**

**Environmental Pillar (Ireland)**



**Environmental Pillar**  
working for a sustainable future

**Voedsel Anders (the Netherlands)**



**Koalicja Żywa Ziemia (Poland)**



koalicja żywa ziemia

**Por otra PAC (Spain)**



## List of organisations that are members/partners of the signatory coalitions

### **Austrian CAP Platform (Austria)**

GLOBAL 2000 /Friends of the Earth Austria, ÖBV - Via Campesina Austria, BirdLife Austria, PRO-GE- Austrian Production Workers' Union, Arbeitsgemeinschaft (ARGE), Sezonieri Campaign for the rights of agricultural workers in Austria. CAP for future - Gute Frucht.

### **Agroecology in action (Belgium – Wallonia)**

Collectif 5C, Associations 21, Autre Terre, Ceinture Aliment-Terre Liégeoise, CNCD – 11.11.11, Le Début des Haricots, Eclasio, L'Agroecology Lab de l'Université Libre de Bruxelles, Entraide et Fraternité, Faune et Biotopes, Fédération des Services Sociaux, FIAN Belgium, FUGEA, Greenpeace Belgium, Inter-Environnement Wallonie, Inter-Actions ASBL, Maison Verte et Bleue, Mouvement d'Action Paysanne, Mutualité Chrétienne, Natagora, Observatoire de la Santé du Hainaut, Oxfam Magasins du Monde, Oxfam Solidarité, Paysans-Artisans, Quinoa ASBL, Réseau des Consommateurs Responsables, Rencontre des Continents, Réseau des GASAP, Réseau Wallon de Lutte contre la Pauvreté, SAW-B, Solidaris, Terre-en-Vue, ULB-Coopération, Worms ASBL.

### **Pour une autre PAC (France)**

---

Afac-Agroforesteries, Confédération paysanne, Fédérations des associations pour le développement de l'emploi agricole et rural (FADEAR), Fédération nationale d'agriculture biologique (FNAB), Mouvement rural de jeunesse chrétienne (MRJC), RENETA (Réseau national des espaces-test agricoles), Réseau CIVAM (Centres d'Initiatives pour Valoriser l'Agriculture et Milieu rural), Terre de Liens, Terre et Humanisme, Union nationale de l'apiculture française (UNAF), Agir pour l'environnement, Compassion in world farming France (CIWF), Fédération des Conservatoires d'espaces naturels, Fédération des parcs naturels régionaux, Fondation Nicolas Hulot pour la Nature et l'Homme, France Nature Environnement, Générations futures, Greenpeace, Humanité et Biodiversité, Les Amis de la Terre, LPO, Réseau Action Climat, Welfarm, WWF, ActionAid France, Agter, ATTAC, Agronomes et Vétérinaires sans Frontières (AVSF), Comité français pour la solidarité internationale (CFSI), Coordination Sud, Ingénieurs sans Frontières — Agrista, Réseau Foi et Justice Afrique Europe, SOL – Alternatives Agroécologiques et Solidaires, Bio Consom'acteurs, Chrétiens dans le monde rural, Citoyens pour le climat, Commerce équitable France, Les Amis de la Confédération paysanne, Les Greniers d'Abondance, Miramap, RESOLIS, Secours Catholique, Slow Food, WWOOF France

---

### **Cambiamo Agricoltura (Italy)**

---

Lipu, Legambiente, WWF, SlowFood Italia, Federbio, Aiab, Associazione Italiana Agricoltura Biodinamica, ISDE Medici per l'ambiente, Pro Natura, AIDA – Associazione Italiana di Agroecologia, CIWF Italia Onlus, ACU – ASSOCIAZIONE CONSUMATORI UTENTI, Rete Semi Rurali, Accademia Kronos.

---

### **Environmental Pillar (Ireland)**

---

An Taisce, Bat Conservation Ireland, BirdWatch Ireland, CELT (Centre for Environmental Living and Training), Coomhola Salmon Trust, Eco Advocacy, ECO-UNESCO, FEASTA, Forest Friends, Friends of the Earth, Global Action Plan Ireland, Gluaiseacht, Good Energies Alliance Ireland, Green Economy Foundation, Green Foundation Ireland, Hedge Laying Association of Ireland, Irish Peatland, Conservation Council, Irish Seed Savers Association, Irish Whale & Dolphin Group, Irish Wildlife Trust, Leave No Trace, Native Woodland Trust, The Organic Centre, The Rediscovery Centre Ireland, Sonairte, Sustainable Ireland Cooperative (Cultivate), Sustainable Projects Ireland (The Village), Vincent Wildlife Trust, VOICE, Wildlife Rehabilitation Ireland, Zero Waste Alliance.

---

### **Koalicja Żywa Ziemia (Poland)**

---

Forum Rolnictwa Ekologicznego im. Mieczysława Górniego, Fundacja Mała Wielka Zmiana, Fundacja Strefa Zieleni, Fundacja WWF Polska, Kooperatywa Spożywcza "Dobrze", Nyeleni Polska, Polski Klub Ekologiczny, Stowarzyszenie Producentów Żywności Metodami Ekologicznymi EKOLAND – Oddział Lubelski, Stowarzyszenia Ekologiczno-Kulturalnego „Ziarno”, Greenpeace Polska, Koalicja Społeczna Stop Fermom Przemysłowym, Ogólnopolskie Towarzystwo Ochrony Ptaków, Fundacja Zielone Światło, Zielone Wiadomości, Instytut Spraw Obywatelskich, Ogólnopolskie Stowarzyszenie Agroleśnictwa, FoodRentgen, Slow Food Warszawa, Stowarzyszenie What a Waste.

---

### **Por otra PAC (Spain)**

---

Asociación Brinzal, Academia Española de Nutrición y Dietética, Asociación Galega de Custodia do Territorio, Asociación Mensa Cívica, Asociación Transhumancia y Naturaleza, Asociación Vida Sana, Centro de Estudios Rurales y de Agricultura Internacional, Confederación de Consumidores y Usuarios, Ecologistas en Acción, Ecovalia (Asociación Valor Ecológico CAAE), Federación Española de la Dehesa, Foro Asturias Sostenible, Foro de Redes y Entidades de Custodia del Territorio, Fundación Ecología y Desarrollo, Fundació Emys, Fundación Entretantos, Fundación Global Nature, Fundación Internacional para la Restauración de Ecosistemas, Fundación Nueva Cultura del Agua, Fundación Oso Pardo, Fundación Pau Costa, Fundación para la Conservación del Quebrantahuesos, Fundación Vida Sostenible, Ganaderas en Red, Germinando (Iniciativas Socioambientales GS Coop Mad), GOB Menorca (Grup Balear d'Ornitología), Greenpeace, Grupo de Rehabilitación de la Fauna Autóctona y su Hábitat, Justicia Alimentaria (Veterinarios Sin Fronteras), Madrid Agroecológico, Observatorio para una Cultura del Territorio, Plataforma de Ganadería Extensiva, Red de Ciudades por la Agroecología, Red Terrae (Asoc. Intermunicipal Territorios Reservas Agroecol.), Sociedad Española de Agricultura Ecológica, Sociedad Española de Ornitología, Trenca, WWF España, Xarxa de Custòdia del Territori