

## Open letter to the European Commission

Mr Frans Timmermans, Executive Vice-President, European Commission  
Ms Dubravka Šuica, Vice-President, Commissioner for Democracy and Demography  
Mr Janusz Wojciechowski, Commissioner for Agriculture  
Ms Stella Kyriakides, Commissioner for Health and Food Safety  
Mr Virginijus Sinkevičius, Commissioner for Environment, Oceans and Fisheries  
Mr Johannes Hahn, Commissioner for Budget and Administration

Subject: Demanding Commission commitment to raise the ambition of the agricultural policies submitted by our governments

07 December 2021

Honourable Commissioners,

We – civil society organisations representing thousands of citizens across the EU – are reaching out to you, Commissioners, to urge you to strongly encourage Member States to develop all the potential opportunities for fairer and greener CAP plans, rather than sticking with the minimum requirements agreed in this reform. The whole college of Commissioners, and especially you, because of your responsibility for our agriculture, health and food, our environment and for climate, for our democracy, for the efficiency of EU's budget, will decide on the approval of agricultural policies submitted by our governments.

Last week, the Council of the EU took the final step of the Common Agricultural Policy (CAP) reform by approving the CAP regulations at European level. According to Commissioner Wojciechowski, "*Member States now have the opportunity to design their own strategies, based on their own needs and strengths. They have the opportunity to set targets, and take actions, to achieve real results*"<sup>1</sup>. Our organisations have been working tirelessly at national level to ensure that such ambition would be reflected in Member States' draft strategic plans. However, results are extremely disappointing for the challenges and commitments ahead.

First, as regards environmental targets, article 92 provides that "*Member States shall aim to make, through their CAP Strategic Plans, a greater overall contribution to the achievement of the specific environmental and climate-related objectives in comparison to the overall contribution made in the period 2014 to 2020.*" However, we are concerned that this will not be the case. For instance, two plans that we have had the opportunity to review (the French and Bulgarian plans) show that Member States are instead going in the opposite direction, by decreasing the amount of money devoted to climate and environment-related action. Our last hope is that the European Commission will not approve CAP strategic plans that do not comply with the so-called "no-backsliding clause", or plans with eco-schemes which include practices that have no scientifically proven positive effects on the environment.

Second, despite the fact that Green Deal targets are not mandatory for Member States, CAP strategic plans should at least offer farmers the option to receive additional support if they are ready to contribute to the transition to sustainable food systems, be it via organic farming, animal welfare, reduction of pesticides or chemical fertilizers, etc. Nevertheless, most CAP strategic plans, as currently written, do not provide farmers with the support needed. It is the European Commission's role to ensure that farmers can contribute to the Union targets for 2030.

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<sup>1</sup> [https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT\\_21\\_6250](https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_21_6250)

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Third, concerning the social dimension of this CAP reform, draft CAP strategic plans also illustrate Member States' lack of intention to really support small and medium-sized family farmers. In Spain and Austria, for example, small farms again would still suffer from an unfair distribution of direct and redistributive payments, and High-Nature-Value farming is forgotten too. Furthermore, Ireland's CAP strategic plan does not make reference to social conditionality at all. We need you, Commissioners, to make sure that such flagrant incompatibilities with your own declarations are going to be corrected before your approval of CAP strategic plans.

Finally, the regulation requires Member States to "organise a transparent process of drawing up their CAP strategic plans and that they establish a partnership with the competent regional and local authorities, economic and social partners as well as civil society." However, in numerous countries, such as Belgium and Italy, thus far conditions have not been fulfilled for an effective knowledge and contribution from stakeholders and citizens. Our organizations ask you to verify that truly transparent procedures are put in place at national level and that Member States have explained how they took citizen's expectations into account.

The poor ambition of the draft plans is a concern for our common CAP. To save the European project and in the general interest, the European Commission must rise up to the challenge during this last stage of the process, which is fully its responsibility. The College of Commissioners that will decide on the validation of Strategic Plans has the legal and political authority to raise the ambition of our governments to carry the expectations of citizens. At least, the targets of the Farm to Fork and the Biodiversity Strategies should be addressed by the Strategic Plans, with a clear pathway to accomplish them beyond good will and intentions.

If the Member States will be paying attention to the approval of their drafts by the European Commission, citizens will be too. Citizens cannot be satisfied by a validation that would threaten the EU's environmental, climate, health and social objectives.

Your sincerely,

**Austrian Civil Society Organisations working on the CAP (Austria)**

**Agroecology In Action, ImPAACTe (Belgium – Wallonia)**

**Flemish Civil Society Organisations working on the CAP (Belgium – Flanders)**

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

**Pour une autre PAC (France)**

**Cambiamo Agricoltura (Italy)**

**Environmental Pillar (Ireland)**

**Koalicja Żywa Ziemia (Poland)**

**Por Otra PAC (Spain)**



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

#### **Austrian Civil Society Organisations working on the CAP (Austria)**

GLOBAL 2000, Friends of the Earth Austria, ÖBV, Via Campesina Austria, BirdLife Austria, Organic Association Erde & Saat, Austrian manufacturing union PRO-GE and others.

#### **Agroecology In Action, ImPAACTe (Belgium – Wallonia)**

Agroecology In Action: 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.  
ImPAACTe: Greenpeace, IEW, Natagora, Nature et Progrès Belgique, WWF.

#### **Flemish Civil Society Organisations working on the CAP (Belgium – Flanders)**

Boerenforum, Climaxi, FIAN Belgium, Wervel.

#### **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, AIAPP, ISDE Medici per l'ambiente, Pro Natura, AIDA – Associazione Italiana di Agroecologia, CIWF Italia Onlus, ACU – Associazione Consumatori Utenti, Rete Semi Rurali.

#### **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,

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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