



Mr. Jerzy Bogdan Plewa  
Director General of the Directorate-General for Agriculture and Rural Development  
European Commission  
Rue de la Loi 130, 1049 Brussels

**REF: 16/028**

**RE: Addition to the greening consultation**

Brussels, 8 March 2016

Dear Director General Plewa,

We are writing to you in reference to the greening consultation: “Experience with the first year of application of the greening obligations under the direct payment scheme (Common Agricultural Policy)”.

We acknowledge the Commissions services for organising this consultation. We must note, however, it’s very limited scope and rigid design which do not allow a proper representation of our key concerns. We thus ask you to take into consideration, as integral part of our submission, the present letter setting out a range of problems that could not be highlighted in the questionnaire.

Our organisations have engaged intensively in the CAP including its greening, trying to find real solutions to ensure that farming in Europe is sustainable and that public money is only used to support this end. This is crucial given the alarming state of nature and the environment across Europe’s farmed landscape<sup>1</sup>.

It is well known that after our sincere and constructive engagement with the initial Commission’s proposals, greening has been systematically dismantled through the co-decision process. We are now left with weak basic legislation and Member States choosing to implement the least

---

<sup>1</sup> See EEA’s State and Outlook on the European Environment 2015: <http://www.eea.europa.eu/soer> , Mid-Term Review of the biodiversity strategy: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/mid\\_term\\_review\\_summary.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/mid_term_review_summary.pdf) and the study carried out by IFAB on the landscape infrastructure and sustainable agriculture: <http://www.eeb.org/index.cfm?LinkServID=0E2EEC07-5056-B741-DBA777455AA46334>

environmentally-beneficial elements from the greening options available<sup>2</sup>. The information that is now being gathered on farmers' implementation is confirming greening's extremely limited environmental potential<sup>3</sup>.

In addition, the ability to robustly assess the environmental impact of greening has been fundamentally undermined by the Commission's failure to establish a sound monitoring system that takes into account not just area, but also the quality, of the measures when compared with a baseline scenario. It would be unacceptable to consider the 2017 Ecological Focus Area's (EFA) revision from an area perspective alone, quality is what matters here. There is for example little point in moving from 5% to 7% if these areas are intensively cultivated and sprayed with biodiversity-harming pesticides.

Of more significance however is the mounting evidence that the current CAP is failing to meaningfully deliver against its overarching objective - the sustainable management of natural resources, itself so critical for the future of farming in Europe. Such fundamental problems cannot be addressed through limited and too superficial reviews of greening, or through a simplification drive detached from an evaluation of the policy performance against its objectives. The current narrow exercise focusing on "simplifying" the greening without assessing its delivery can only further undermine the rigour and credibility of the CAP and of the EU in general.

With the current crises facing the EU and the growing pressure on its budget, it is more than ever important to justify every cent of taxpayers' money that is being spent. The CAP, still amounting to almost 40% of the EU budget, cannot be exempted from this scrutiny. The time has come therefore for the Commission to start a real discussion on value for money of the CAP and the first step in this process would be to conduct a rigorous and objective fitness check review of this Policy.

We urge you to take up these more fundamental questions in the conclusions of your consultation and in the future reflections on the policy.

Yours sincerely,



Pieter De Pous  
EU Policy Director  
European Environmental Bureau



Ariel Brunner  
Senior Head of Policy  
BirdLife Europe

---

<sup>2</sup> IEEP study on the implementation choices of 9 Member States and their environmental implications: <http://www.eeb.org/index.cfm?LinkServID=0DFEF8B2-5056-B741-DB05EBEF517EDCCB>

<sup>3</sup> Sebastian Lakner – analysis on EFAs in Germany: <https://slakner.wordpress.com/2015/10/08/ecological-focus-area-in-germany-the-full-dataset/>