



**GREENPEACE**



Nadia Calviño, DG – Budget  
Daniel Calleja Crespo, DG – Environment  
Jean-Éric Paquet, DG – Research and Innovation  
Raffaele Mauro Petriccione, DG – Climate Action  
Xavier Prats Monné, DG – Health and Food Safety  
Jerzy Bogdan Plewa, DG – Agriculture and Rural Development

Brussels, 8 May 2018

Dear Directors General,

We are writing to you regarding the Common Agricultural Policy (CAP) proposal that was leaked to the press on 24 April, and more specifically regarding a number of serious concerns that must be addressed before its final publication.

The EU is lagging behind in achieving its environmental objectives and commitments, in particular with regards to agriculture. In light of this, the Commission's Communication on the Future of Food and Farming promised to deliver "a higher level of environmental and climate ambition, and address citizens' concerns regarding sustainable agricultural production."

Regrettably, whilst the proposal greatly increases the flexibility for Member States, it does not offer the necessary accountability mechanisms to avoid a race to the bottom on standards. Rather than the "transition to sustainable agriculture" promised in the Multiannual Financial Framework (MFF) and the CAP Communication, the proposal could in fact *worsen* the impact of agriculture on the environment and climate, which risks alienating a significant pro-European constituency and further undermining the credibility of the CAP.

We highlight the following major areas of concern, along with the needed improvements:

1. **Dropping the 30% ring-fencing in Pillar I is incompatible with a higher environmental and climate ambition.** Further, in the proposal, Member States can choose the priorities of their national CAP plans, allowing them to drop part of the objectives. **This can only be avoided by making all health, climate and environmental objectives mandatory for all Member States, while ring-fencing at least the current levels of CAP first and second pillar funds for such objectives.**
2. The proposed 'enhanced' conditionality should be expanded to include *all* key elements of all relevant environmental legislation, including the **Water Framework Directive, the National Emission Ceilings Directive, the Directive on the Sustainable Use of Pesticides and the Birds and Habitats Directives.**
3. The proposal does not foresee any real safeguards against environmentally and/or climate harmful spending. Past experience shows that the misuse of certain tools, like investment

support or coupled payments, has reinforced environmentally harmful farming practices.<sup>1</sup> **The new regulation must include clear safeguards to prevent CAP money to be used in perverse subsidies that will cause environmental, climate and economic damage over the short and long run.** Support to the livestock sector should be assessed with special care, to help in transitioning away from unsustainable industrial animal farming.

4. The approval process of national CAP plans and their revisions is too short to allow proper assessment of MS proposals, which on past experience are at risk of being submitted without sufficient scientific evidence or stakeholders' consultation. **The Commission must allocate enough time and resources to the approval process, and have appropriate mechanisms to ensure high quality and environmental adequacy of national CAP plans, including the ability to only approve the parts of the plan meeting these criteria.**
5. There is a need for scientifically sound indicators and monitoring systems, along with a **requirement to all Member States to assess the effectiveness of each individual scheme they deploy using a robust, scientific methodology.** These are crucial to the success of the promised shift from a focus on spending to a focus on performance.

We therefore very much hope that you will take into account our concerns and remain at your entire disposal for any follow up to these suggestions that you may have.

Best regards,



Patrick Ten Brick  
Policy Director  
European Environmental Bureau



Marco Contiero  
EU Policy Director for Agriculture  
Greenpeace European Unit



Ariel Brunner  
Senior Head of Policy  
BirdLife Europe and Central Asia



Andreas Baumüller  
Head of Natural Resources  
WWF – European Policy Office

---

<sup>1</sup> As highlighted by the European Court of Auditors in its March 2018 briefing paper on the CAP Communication:  
[https://www.eca.europa.eu/Lists/ECADocuments/Briefing\\_paper\\_CAP/Briefing\\_paper\\_CAP\\_EN.pdf](https://www.eca.europa.eu/Lists/ECADocuments/Briefing_paper_CAP/Briefing_paper_CAP_EN.pdf)