



CAP Strategic Plans - are they likely to deliver on given promises?

Policy briefing

February 2022

Background

The new Common Agricultural Policy has been described by the European Commission as fairer, greener and more flexible. Higher environmental and climate ambition has been promised, and the CAP strategic plans (CSPs), to be implemented from January 2023, are supposed to contribute to the European Green Deal objectives.

NGOs have criticised the new CAP for being a too broad and inadequate framework, which will not guarantee that this generously funded policy (31% of EU budget) delivers what is needed to tackle the unprecedented climate and biodiversity crises. The history of previous CAP has shown that when Member states are given flexibility which they can use to increase environmental ambition, they tend to do the opposite.

Now, that most CAP strategic plans have been submitted to the European Commission for the official review and approval process, BirdLife Europe and the EEB have worked with their national experts to check whether the CAP strategic plans deliver on the promises.

EEB and BirdLife national experts screened 23¹ out of 28 draft plans against 7 key criteria of the EEB's [10 Tests for a Green Deal-compatible CAP](#) using multiple choice questions (see Annex). Their analysis was translated into a traffic light benchmarking system of how countries score on each of the criteria. The evaluation is based on the information available as of 15 February 2022 and builds on the [preliminary assessment](#) released in November 2021 using the same methodology. At that time, our assessment showed that the overwhelming majority of national strategic plans

¹ Austria, Belgium-Wallonia, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

fall short of ambitions and lack clear targets, measures and funding to halt biodiversity loss and to cut greenhouse gas (GHG) emissions.

This updated assessment aims to fill in previous data gaps, track any changes in the ambition and provide an overall picture of the CAP strategic plans adequacy. In this critical period when the final versions of the plans are being negotiated between the European Commission and Member states, this assessment highlights the areas which require improvement to ensure that CAP funds deliver on stated promises and objectives.

Overall assessment of CAP strategic plans and key changes

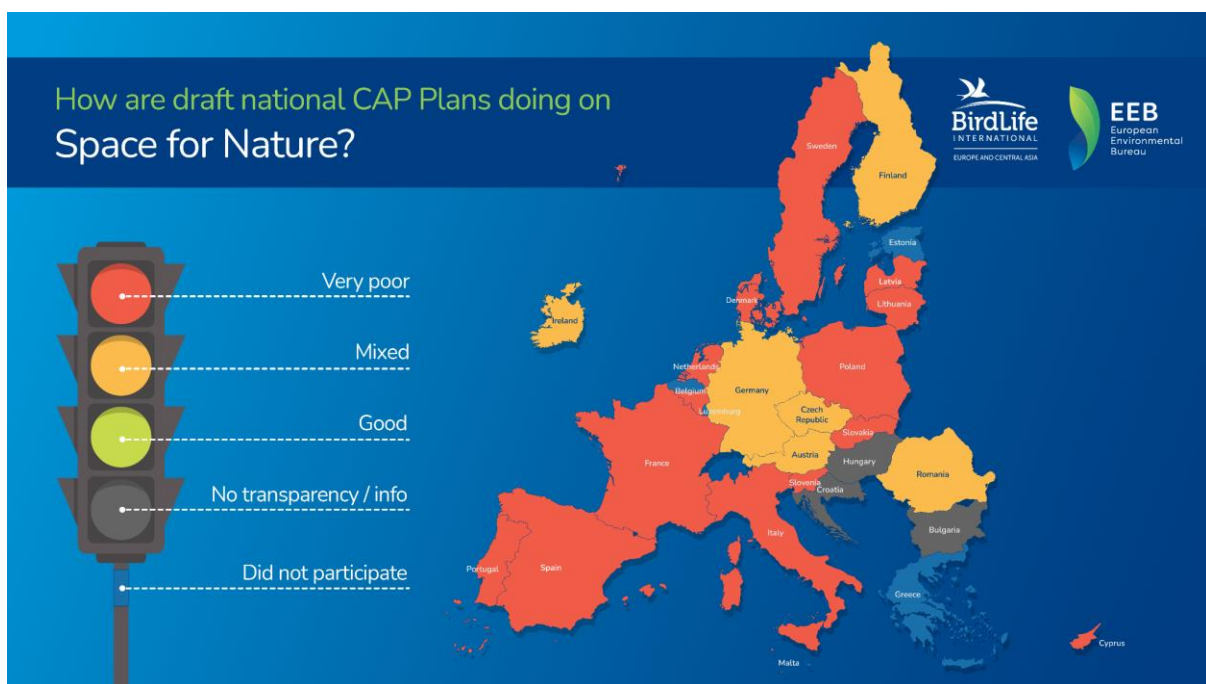
18 out of 23 plans score only poor or very poor across the different dimensions, indicating that the overwhelming majority of CSPs will fall short of what has been promised with regards to environmental and climate objectives.

According to our national experts, 7 CAP Strategic Plans have changed for the worse in one or more of the given categories since November (Latvia, Lithuania, Denmark, Spain and Austria) while 6 Member States indicated that their plans have slightly improved on certain dimensions (Slovakia, Germany, Czech Republic, Ireland, the Netherlands and Bulgaria). Moreover, 8 Member States filled in previous data gaps and were able to provide a more complete assessment of their CSPs, including Croatia, Cyprus, France, Poland, Slovakia, Spain, Italy and Romania. However, in all but one case the assessment was either poor or very poor for the given category, thus further demonstrating the misalignment between the CSPs and European Green Deal targets.

#Space4nature

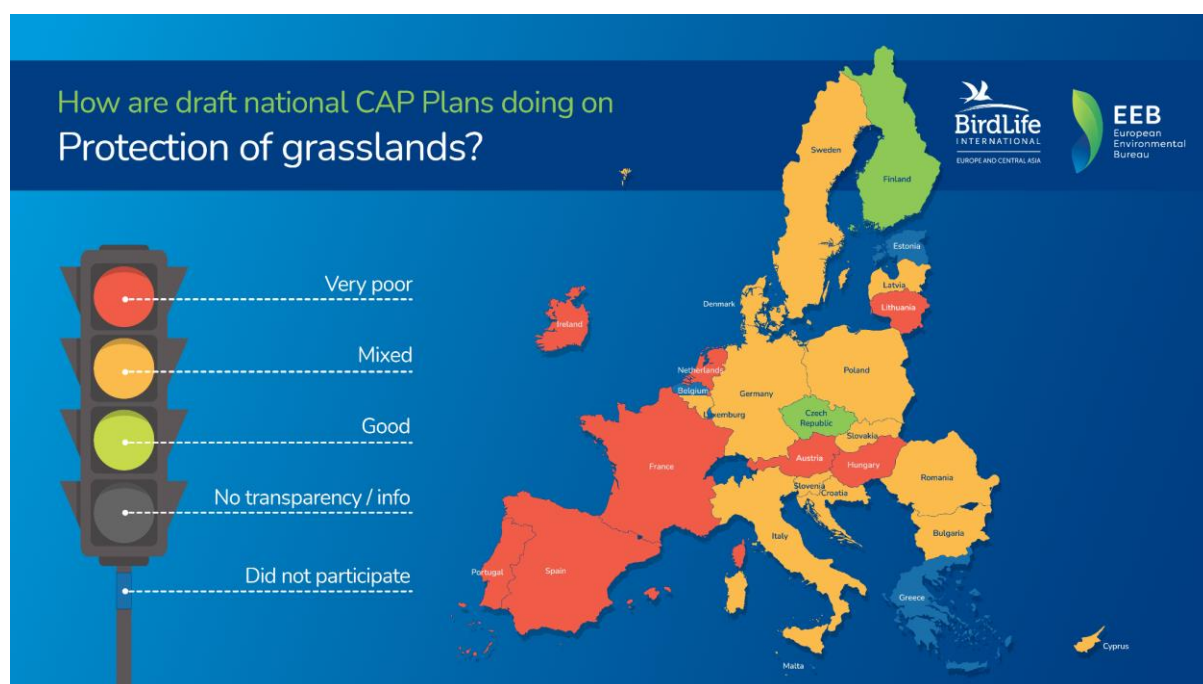
Studies from across Europe show that if a minimum of 10% of agricultural land were to be non-productive, birds and thus other wildlife would recover. Through the 8th Good Agricultural and Environmental Conditions (GAEC) and voluntary measures, in principle, the CAP provides tools that can contribute to restoring biodiversity.

However, none of the assessed countries for which sufficient information was available (20) put forward sufficiently ambitious targets and adequate measures to reach the target of 10% of agricultural areas under high diversity landscape features as set in the Biodiversity strategy. For the remaining 3 countries included in this assessment, our experts did not have enough information to come to a judgement on the matter.



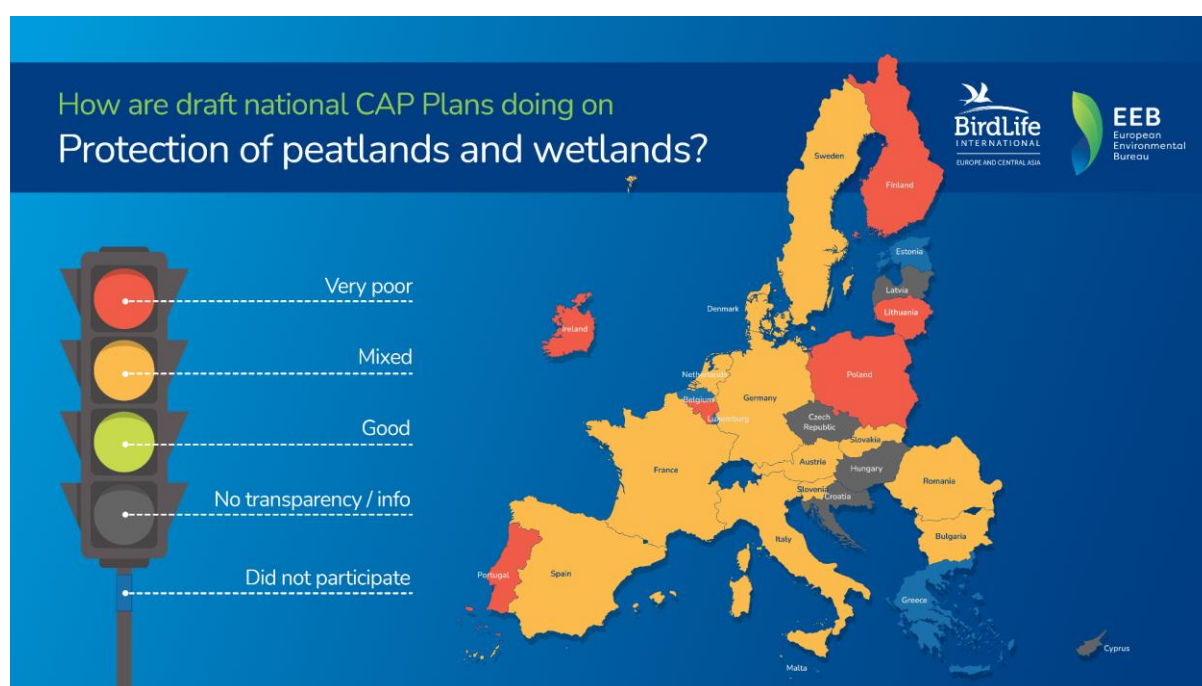
Protection of grasslands

The protection and maintenance of grasslands, which are home to a range of flora and fauna and act as important carbon sinks, is a pivotal tool in tackling climate change and halting biodiversity loss. However, only 2 countries (Czech Republic and Finland) score well on this dimension, indicating that most national CAP plans will lack strong enough measures and targets to protect and sustainably manage grasslands.



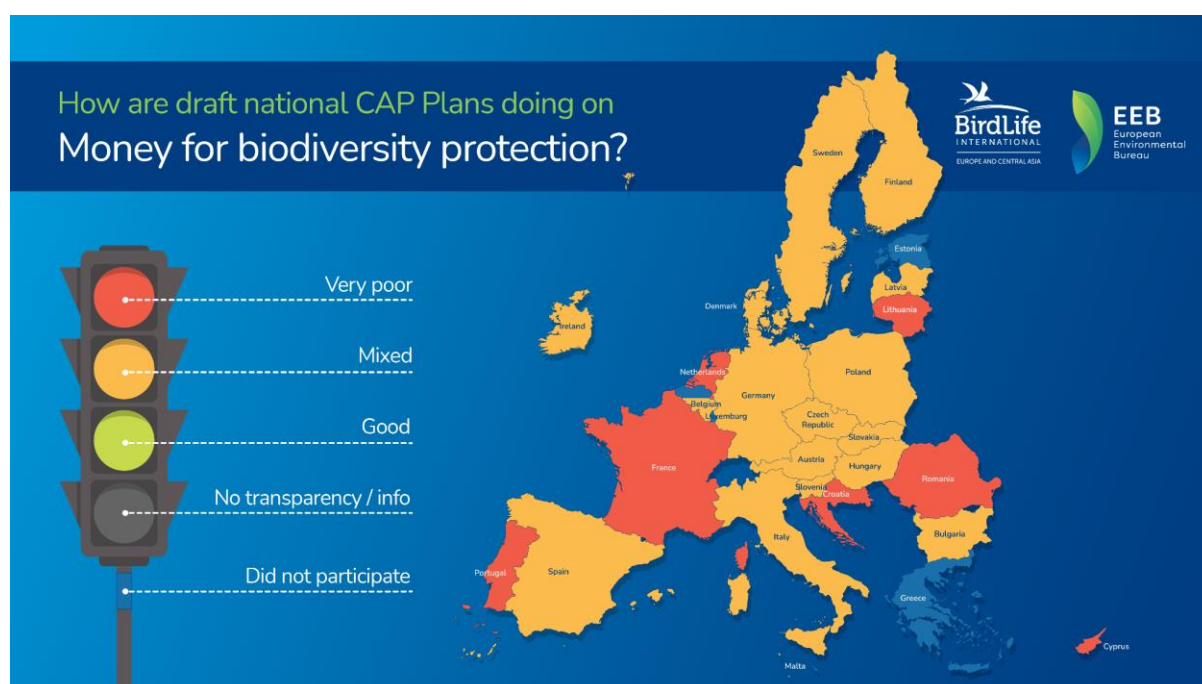
Protection of peatlands and wetlands

Similarly, protecting and restoring wetlands and peatlands is one of the most effective measures to avoid further GHG emissions. Currently, 3% of the EU's agricultural area is made up of drained peatlands, which are estimated to emit [167Mt CO₂e](#) (as much as the total emissions of Belgium and Bulgaria combined). Yet, our experts expressed concerns about the lack of action to protect and restore peatlands and wetlands through the CAP in every country where they were able to assess this dimension (18). In several countries with a high share of peatlands and high emissions from degraded peatlands, Finland, Ireland, Lithuania, and Poland, the level of protection granted by conditionality was deemed very poor.



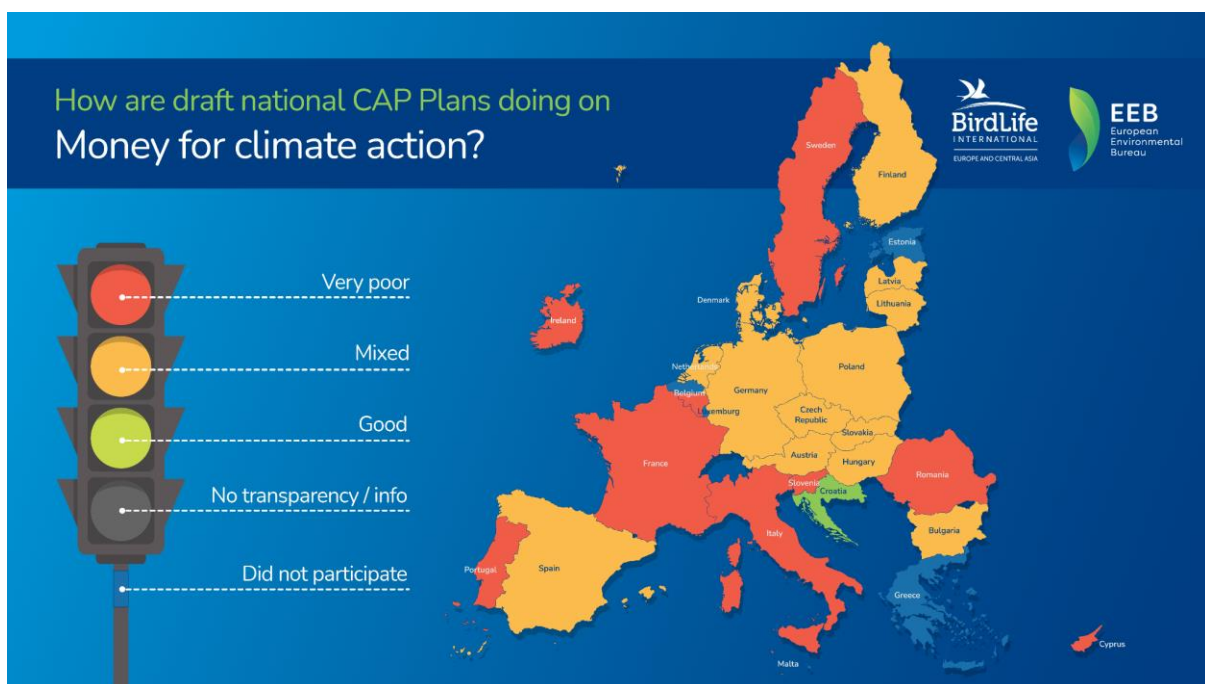
Money for biodiversity protection

The CAP should be one of the key EU funding instruments supporting biodiversity conservation. However, 16 out of 23 countries reported that some good schemes for biodiversity have been included in the national CSPs, but they lack sufficient funding and sufficient target area to make a difference. 7 countries reported that proposed voluntary measures for biodiversity are of both insufficient quality and quantity.



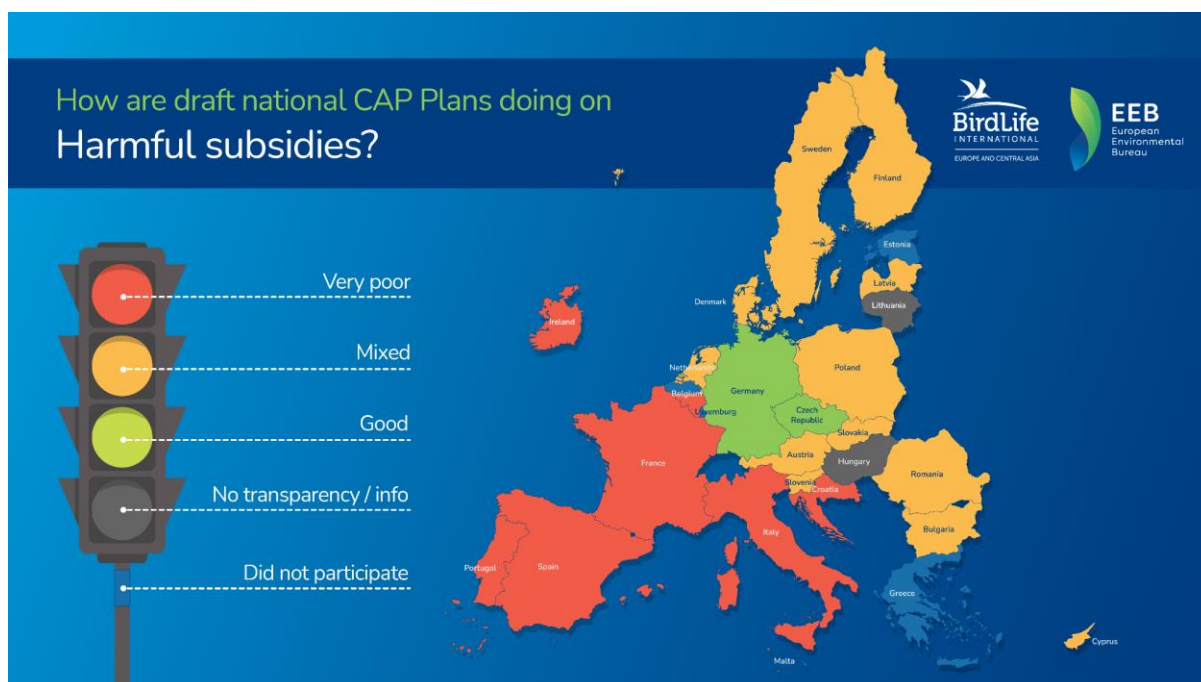
Money for climate action

A similar mixed picture emerged when experts were asked if proposed voluntary measures related to the climate objective are likely to reduce GHG emissions: 13 national plans include several well-targeted and well-designed measures, however, some key GHG sources remain completely unaddressed and/or the budget allocations are not sufficient. Experts in 9 countries answered that there are no measures to tackle the main GHG sources in their CAP.



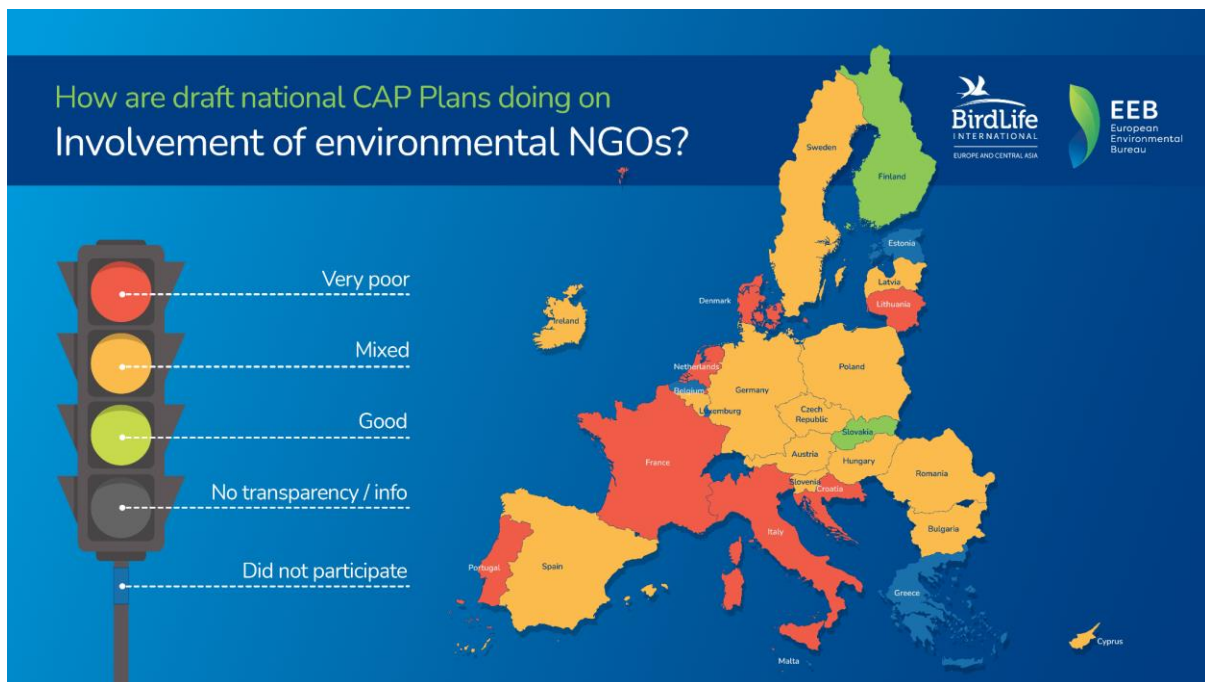
Harmful subsidies

When asked how concerned experts were about environmentally harmful subsidies in their national plans, in 82% cases (19 out of 23) our experts identified perverse subsidies or subsidies with high risk of causing harm and not enough safeguards to mitigate risks.



Involvement of environmental NGOs

With the exception of Finland and Slovakia, experts from all assessed countries rated the quality of the stakeholder process as poor or very poor. NGOs were either not meaningfully involved in the drafting process of the plans or their concerns were insufficiently taken into account, without good justifications provided for ignoring their input.



Conclusion

This assessment raises serious concerns about the adequate quality of the draft CAP Strategic Plans. It also questions the European Commission's strategy to rely on Member States and their CAP Strategic Plans to deliver on the Green Deal targets.

The European Commission must make sure that this policy, which accounts for a third of the total EU budget, delivers for our climate and nature, instead of continuing to fund business as usual and exacerbating the demise of nature. The European Commission should:

- Send Member States severe and ambitious observation letters requesting changes to the draft CAP strategic plans and make those letters public
- Publish Member States' replies to the Commission observations, making them subject to public scrutiny
- Not approve any CAP Strategic Plans that fail to deliver on the environmental objectives of the CAP or are in breach of EU laws

Member States should heed the observations from the European Commission and present revised plans that are truly putting agriculture on the path to sustainability. This decade is crucial to address climate change and halting biodiversity loss and Member States still have the opportunity to improve their plans by putting adequate measures and funding in place.

Contacts:

Sophia Caiati, European Environmental Bureau, <mailto:sophia.caiati@eeb.org>

Tatiana Nemcova, BirdLife Europe, tatiana.nemcova@birdlife.org

Annex:

Category	Guiding questions/rating
<p>Space for nature</p>	<p>Has your country set a target (R.34 or I.21) to reach at least 10% of agricultural area under high diversity landscape features, and are there adequate measures (conditionality + voluntary) to reach it?</p> <ul style="list-style-type: none"> · Unambitious target and insufficient measures (RED) · Adequate target but measures are unlikely to deliver (ORANGE) · Adequate target and good measures in place (GREEN) · Information on this target not available (GREY)
<p>Protection of grasslands</p>	<p>Does your country provide effective protection of permanent grasslands outside Natura 2000 (GAEC1)? (for example by defining the maximum conversion rate at regional/local level, not allowing ploughing and reseeded, and/or implementing a robust system for authorising conversion)</p> <ul style="list-style-type: none"> · No (RED) · Somewhat (ORANGE) · Yes (GREEN) · Information on GAEC 1 design is not available (GREY) <p>Does your country provide strict protection for grasslands in N2000 areas (GAEC 9)?</p> <ul style="list-style-type: none"> · No, the definition of “environmentally sensitive permanent grasslands” (ESPG) excludes vast areas of N2000 grasslands (RED) · Not enough, ESGP don’t cover all relevant grasslands in N2000 areas (ORANGE) · Yes, ESGP cover all grasslands in N2000 areas (GREEN) · Information on GAEC 9 design is not available (GREY)

<p>Protection of wetlands and peatlands</p>	<p>Is your country taking strong action to protect and restore peatlands and wetlands through the CAP? (GAEC 2)</p> <ul style="list-style-type: none"> · No, GAEC 2 won't make any significant difference (RED) · Not enough, GAEC 2 may slow down ongoing degradation due to drainage but it won't stop it. (ORANGE) · Yes, it will be implemented in an effective way. (GREEN) · Information on GAEC 2 design is not available (GREY) <p>Bonus points: Is your country putting in place in the CAP Plan... (tick any that is applicable):</p> <p>+Effective measures in place to support management of semi-natural grasslands</p> <p>+Effective measures in place to support restoration of grasslands</p> <p>+Effective measures in place to support restoration of peatlands</p> <p>+Effective measures in place to support paludiculture</p>
<p>Money for biodiversity protection</p>	<p>Are the proposed voluntary measures (ecoschemes, AECM) for biodiversity sufficient and likely to halt and reverse the biodiversity loss in your country?</p> <ul style="list-style-type: none"> · No, proposed management schemes for biodiversity (ecoschemes, AECM) are insufficient (RED) · Not enough, there are some good schemes, but they are not on sufficient scale and lack funding (ORANGE) · Yes, effective schemes in place with adequate funding. (GREEN) · Information on voluntary schemes for biodiversity is not available. (GREY)
<p>Money for nature and climate</p>	<p>Are the proposed voluntary measures related to climate objective likely to reduce GHG emissions? (ie. by helping to reduce livestock numbers and fertiliser use, rewet peatlands, establish and maintain agroforestry systems, maintain semi-natural grasslands, restore healthy soils)</p>

	<ul style="list-style-type: none"> · Not at all, there are no measures to tackle the main GHG sources in my country, and the 'climate measures' won't deliver change (too little budget, paying for business as usual or techno-fixes...) (RED) · Somewhat, there are several well-targeted and well-designed measures, but some key GHG sources remain completely unaddressed and/or the budget allocations are not sufficient. (ORANGE) · Yes, (almost) all GHG sources are addressed with well-designed and well-funded measures (GREEN) · No information on this available (GREY)
<p>Harmful subsidies</p>	<p>How worried are you about environmentally harmful subsidies in your national Plan (both livestock and cropping)?</p> <ul style="list-style-type: none"> · Very worried, there are risky measures and no safeguards at all (RED) · Quite worried, there are risky measures and the safeguards are too weak (ORANGE) · Not worried, there are no risky measures, or strong safeguards are present to mitigate risks (GREEN) · No information on this available (GREY)
<p>Public participation</p>	<p>How would you rate the quality of the stakeholder consultation process in your country?</p> <ul style="list-style-type: none"> · Very poor (RED) · Poor (ORANGE) · Good (GREEN) <p>Into what extent did your government take into account your views/concerns</p> <ul style="list-style-type: none"> · Not at all, our concerns are not acknowledged nor addressed (RED) · To a certain extent, our concerns are mostly acknowledged, but only very partially addressed (ORANGE) · To a large extent, most concerns are fully addressed (GREEN)