



To: Agriculture Ministers of EU Member States

Cc: Executive Vice-President for the European Green Deal and Commissioners for Agriculture and for Environment, and the Chairs of the European Parliament Agriculture and Environment Committees

Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 27 May 2024

Brussels, 24th May 2024

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share our views on some of the issues on the agenda of the forthcoming EU Agriculture and Fisheries Council on the 27th of May 2024. We have structured the letter according to the provisional agenda that is publicly available, mainly focusing on your deliberations within our expertise and priorities.

I invite you to take our concerns into account during the final official level preparations, as well as at the meeting itself.

Current situation in the agricultural sector

The recent reform of the current Common Agricultural Policy (CAP), based on the European Commission's proposal for a "CAP simplification" effectively revokes key environmental conditionalities under the CAP, without addressing the structural concerns increasingly voiced by farmers over the past few months. The process that led to this reform proposal, amending two CAP regulations, did not respect basic EU standards of transparency, public participation and evidence-based decision-making.

First the European Commission failed to involve all relevant stakeholders as well as the public at large, thus disregarding EU legal principles and its own Better Regulation Guidelines. Only four farming organisations were consulted in a week's time and out of those four, only one of them called for a weakening of conditionality elements, while two others were clear about the fact that simplification should not lead to the weakening of environmental conditions. This was even reiterated in a [joint letter](#) sent by IFOAM Organics Europe and European Coordination Via Campesina (ECVC), who claimed that they had been consulted but not heard. This skewed and undemocratic approach firmly contradicts the Commission's stated intention of depolarising the debate around the future of EU farming.

The reform undermines the legitimacy of the CAP by fast-tracking a process that will break down key measures that took over three years and a half of extensive negotiations to build. Even if presented as 'minor simplification' tweaks, it goes far beyond a few minor tweaks and impacts over 30% of the EU budget – without the support of the taxpayers funding the CAP.

Although it was not a strict legal requirement for the proposal to undergo an impact assessment before publication, the substantial alterations introduced by it entail it is impossible to take the 2021 CAP proposal impact assessment as a reference. In the absence of an updated impact assessment, the

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effects of the removal of all significant environmental conditionalities from CAP, including on the contribution of CAP to climate budget mainstreaming and biodiversity, remain a complete unknown.

Additionally, the measures ignore unequivocal scientific evidence on the need for a just transition towards genuine social, economic, and environmental sustainability in the farming sector. It completely contradicts recent recommendations from the European Environment Agency (EEA), which clearly indicated the key role the food and farming sector must have in addressing the climate crisis ([European Climate Risk Assessment](#)).

With EU farmers facing mounting threats and challenges due to the climate and biodiversity crises and an unfair pricing and market system, the CAP should instead be restructured into a modern Common Agricultural, Food, and Land Stewardship Policy (CAFLSP), with a just transition towards social and environmental sustainability in the farming sector as its core guiding objective. Together with BirdLife and WWF, we published a comprehensive set of science- and evidence-based recommendations for the needed transition – [A Brighter Future for EU Food and Farming](#).

This new CAFLSP should be an integral part of a new social and environmental deal for a one-planet economy that ensures a just transition for all which builds on the Green Deal. This new social and environmental deal ([A European Pact for the future](#)) should guide the entire upcoming mandate.

We call on you to urgently request a scientific review and updated impact assessment of the CAP in its new configuration to develop a clear overview of its prospective economic and environmental effects on the agricultural sector and society as a whole. We also call on you, in the context of the upcoming mandate and the new budget cycle, to eventually turn this policy into an instrument of the necessary and urgent transition in the agriculture and food sector.

Placing animal welfare at the core of the next European Commission's agenda

The missed publication of a comprehensive proposal for revision of the EU animal welfare legislation from the Commission is extremely disappointing. European citizens have repeatedly and overwhelmingly expressed their support and expectations for improved animal welfare on European farms and a phase out of the use of cages in farming. The Commission's own Fitness Check (2022) concluded that current legislation is outdated and not up to pace with national level legislation, citizens' expectations and scientific evidence.

We urge you to give this evidence due consideration in your discussion and clearly recognise the need for an urgent revision of EU animal welfare legislation to be at the top of the next EC's political agenda.

Large carnivores

In addition, some delegations plan to raise the issue of large carnivores in Europe. We would like to reiterate our opposition to the European Commission's proposal for a Council Decision to lower the protection status of the wolf under the Bern Convention as it appears to be politically motivated, rather than based on reliable scientific evidence, as well as going against the public opinion. We maintain that responsible wildlife management and conservation must be driven by science-based data and focus on prevention measures to achieve coexistence with large carnivores.

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We therefore urge you to work with your counterparts in the environment ministries to ensure that existing legal protections for wolves, as enshrined in the EU Habitats Directive, are upheld and enforced consistently across the Member States and uptake of coexistence and prevention measures between wolves and local communities is significantly stepped up.

Yours sincerely,



Patrick ten Brink,

Secretary General of the European Environmental Bureau

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