



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, 23rd September 2024

Brussels, 27th September 2024

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share with you our views on some of the issues on the agenda of the EU Agriculture and Fisheries Council on 23rd September 2024. We have structured the letter according to our understanding of the Council Agenda, mainly focusing on your deliberations within our expertise and priorities. I invite you to take our comments into account following Monday's council meeting.

Outcome of the Strategic Dialogue on the Future of Agriculture

As one of the 29 participants in the Strategic Dialogue on the Future of Agriculture, we would like to share some takeaways from this process, which resulted in a historic consensus between farmers unions, environmental organisations, and other actors of the food chain.

First, the process showed that by bringing the different stakeholders together and pursuing genuine dialogue, mutual understanding and broad agreements can be achieved. This highlights the importance of building bridges between agricultural and environmental actors, which we warmly encourage you to do, for example by engaging equally with environmental stakeholders in the margins of Council meetings.

Second, the Strategic Dialogue report shows a strong consensus across the agri-food chain on the need to overhaul the Common Agricultural Policy to make it much more targeted and effective. The Dialogue participants agreed that any income support must only go to the farmers who need it the most, based on their economic viability and "moving away from current non-degressive area-based payments". There was also consensus on the need for year-on-year substantial increases in the share of the CAP dedicated to environmental outcomes based on a "system of targeted and result-oriented environmental payments" "designed, managed and controlled jointly by environmental and agricultural authorities."

Finally, we would like to highlight the collective recognition that "in order to contribute to keeping farming within planetary boundaries, food consumption patterns need to change" and the call for the Commission and Member States to "adopt demand-side policies, which address the whole food system,

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to create enabling food environments where balanced, sustainable healthy diets are available, accessible, affordable, and attractive.”

While these are only snapshots of a very long and comprehensive report covering many other aspects, we believe the points highlighted here are particularly relevant in light of the debates on the future of the CAP you have started and will continue to have over coming months.

Stocktaking of the first year of implementation of the CAP Strategic Plans

The ‘New Delivery Model’ which underpins the 2023-2027 CAP was presented as a move from compliance to performance. In light of the major social and environmental challenges facing the agricultural sector, focusing the CAP on delivering the right outcomes is indeed critical. Such a significant change to the design and implementation logic of the policy clearly requires a transition phase and major investment in capacity building and digital infrastructure within the administration and amongst farmers. Many research projects are developing solutions to modernise the administrative systems of the CAP, allowing for a greater focus on performance while reducing the administrative burden (e.g. [NIVA](#), MEF4CAP).

In the age of digitalisation, big data and artificial intelligence, the answer to calls for ‘simplification’ and reduced reporting burden must be to invest in modern administrative systems and monitoring technologies. Reducing environmental ambition for the sake of “cutting red tape” is a self-destructive strategy which will only worsen the nature and climate crises and hence jeopardise productivity and competitiveness¹.

We therefore call upon the Agriculture and Fisheries Council to:

- Reflect on the fitness of the New Delivery Model **from the perspective of the urgent need to tackle the triple climate, biodiversity and pollution crises** which the agriculture sector is both a contributor to, and a victim of.
- Beyond the challenges, exchange on **best practices and successes in CSP implementation** in order to pursue further performance orientation and cost-effectiveness in the administration of the CAP.
- Focus the discussion on the future on how the CAP can become **genuinely result-oriented post-2027** within a food system’s approach, as recommended by the Strategic Dialogue.

Please find further information here:

- Joint EEB-BirdLife-WWF report [A brighter future for EU food and farming](#)
- Joint EEB-BirdLife-WWF report [“New CAP unpacked and unfit”](#)
- IEEP-Ecologic assessment of the French, Polish, Spanish and German CSPs: [Environmental and climate assessments of CAP Strategic Plans](#)
- OECD report Policies for the [Future of Farming and Food in the European Union](#)
- Mapping and analysis of CSPs by Ecorys, Metis and Agrosynergie: [Full report](#) and [Executive summary](#)

The declaration of MED9 Ministers of Agriculture on the threat of drought

The Joint Declaration of Ministers of Agriculture of the MED9 recognises the threat of drought to the primary sector in Mediterranean Member States. At the same time, intensive agriculture is one of the most significant pressures preventing Europe’s waters from reaching legally binding environmental objectives, both in terms of quantity and quality set in the Water Framework Directive. The EU water laws are key tool to ensure the health of the freshwater ecosystems that provide us with water,

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however, they need to be properly implemented, enforced and funded. We welcome the conclusion from stakeholder-driven Strategic Dialogue on Agriculture which has recommended to maintain and enforce the Water Framework Directive and the Nitrates Directive as well as asked for the European Commission to bring forward promised Integrated Nutrient Management Action Plan (INMAP).

The Joint MED9 Declaration calls for measures to ensure water storage. We strongly believe, such measures must prioritise natural water storage options that works with nature, not against it to ensure there is enough green and blue water for nature and people. Preserving water in the landscape is vital to mitigate the effects of water scarcity and drought and increase water resilience.

We therefore call upon the Agriculture and Fisheries Council to:

- **Engage in making the EU water water resilient** including through needed positive contribution from the agricultural sector, however, we urge you to **steer clear of maladaptation measures, such as artificial reservoirs for water storage, or water diversion schemes, or other purely grey infrastructure measures that harm nature** as they risk locking us in unsustainable agricultural practices that will only decrease water resilience in the long term.

Please find further information:

- Joint LRE briefing for a water resilient Europe [“Adapting to the climate and water crises”](#)

We would also like to share with you our [Action Plan](#) for the [European Pact for the Future](#). This details our vision of priority measures for the next legislative cycle, with considerable space dedicated to the needs for farming, sustainable agriculture and sustainable food systems - reflecting the conclusions of the Strategic Dialogue on Agriculture and Political Guidelines. We hope that you find it useful.

Thank you in advance for your consideration of these points which will help address the climate, biodiversity and pollution crises in the EU and give citizens confidence that their leaders are taking decisions to create the basis for a better future for them.

Yours sincerely,

Patrick ten Brink,

Secretary General of the European Environmental Bureau

Extensive research by the [OECD](#) and by the [European Commission itself](#) shows that well-designed regulation can contribute to innovation, a key component of productivity and growth. There is no scientific basis for claiming that the exact amount of legislation is preventing competitiveness, it's all about how it is designed.

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