



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, 26 March 2024

Brussels, 20th March 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 26 March 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.

Need for rapid and structural responses to the current crisis situation in the agricultural sector

The European Commission's proposal to review the Common Agricultural Policy¹ (CAP) undermines the legitimacy of the CAP itself and goes against the clear scientific need for a just transition towards genuine social, economic, and environmental sustainability in the farming sector. The proposal further fails to achieve its own stated objectives.

First the process that led to the publication of the proposal was deeply undemocratic. This review goes well beyond minor tweaks affecting over 30% of EU budget yet it has not gone through any sort of impact assessment. Additionally, the European Commission did not conduct a proper consultation and instead decided to consult swiftly with "four leading EU farming organisations" without even revealing their name nor their contribution. As this proposal cuts or substantially weakens fundamental requirements for how a third of the EU budget is spent, this failure to consult significantly undermines public trust in the EU, the legitimacy of the CAP and core principles of sound public governance. This is also in total contradiction with recent attempts from the European Commission to 'depolarize' the debate around farming and environment and on the contrary risks exacerbating polarization even further.

¹ **Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendments to CAP Strategic Plans, review of CAP Strategic Plans and exemptions from controls and penalties**

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Second, the European Commission proposal is in complete contradiction with the EU institutions recent new piece of evidence on the risks associated with climate change 'The European Climate Risk Assessment report' which calls for urgent and decisive action supporting the transition in the food and farming sector. The CAP has already been found to be failing to achieve its environmental objectives, and even exacerbating them in some cases, while also failing farmers who are leaving the sectors en masse. The Commission's proposal will, by fostering a deleterious status quo, aggravate these failures, leading no one to gain from its proposal in the long term.

Third, the proposal further fails to address the actual concerns of farmers. While the reasons for recent protests are diverse, the low farmgate prices, what is deemed as 'unfair' competition, the unfair distribution of funds in the food value chain, as well as lacking support to transition to agroecological practices and to adapt to the climate and biodiversity crises are major challenges. The Commission's proposal fails to address these. Instead of providing real solutions, the proposals are short-term measures that will further exacerbate these concerns by rendering the few environmental requirements that are crucial for a transition of the agricultural system voluntary. This will endanger long term food-security and the future viability of farming in the EU.

Furthermore, the claim that the proposals will alleviate the 'administrative burden' on farmers is misplaced. Under Title IV, Chapter V of the CAP Monitoring Regulation 2021/2116, Member States are responsible for establishing conditionality monitoring systems. Under Art.83(6)(d)(iii) Regulation 2021/2116, control systems for conditionality must only cover 1% of all beneficiaries. Monitoring of conditionality compliance therefore does not impose significant administrative burdens on farmers at large. *De facto* scrapping conditionality requirements at EU level will consequently also not reduce administrative burdens which depend on the approach of national governments.

We therefore call upon the Agriculture and Fisheries Council to:

- **Reject the Commission's proposal** to add derogations to several Good Agricultural and Environmental Conditions of land (GAECs) of the CAP on the basis of:
 - The failure to carry out an impact assessment and consultation, thereby undermining key good governance principles; and
 - The stark contradiction with the needed urgent action to support the transition in the food and farming sector, thereby failing to address farmers concerns;
- Ensure **good governance, due process, transparency and participation of all affected parties** in the Commission's decision-making;
- Recognise the **scale and urgency of the changes required in our food systems** to address the environmental crisis and make the sector future-proof;
- Acknowledge and act upon the need to **better target CAP support** to the transition to more diversified, sustainable and resilient agriculture, including by encouraging and supporting the wide **uptake of agroecological practices** through more ambitious schemes and increased funding for environmental objectives;
- **Refrain from watering down crucial environmental regulations** or CAP conditionality requirements on the basis of 'food security' or market-related arguments which instead require doubling down on supporting a structural transformation of the agriculture sector towards sustainability and resilience;

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- Call on the European Commission to use the Strategic Dialogue, it itself initiated to discuss any change in the current policy framework to support the much needed transition.

See the joint paper [A brighter future for EU food and farming](#) for more information.

The EU reduction target for 2040 and the agricultural sector

To meet the EU's climate targets and stay in line with commitments under the Paris Agreement, rapid and significant emission reductions are needed across all sectors. Agriculture is responsible for over 10% of the EU's total greenhouse gas emissions. A large part of these emissions are non-CO2 gases such as methane and nitrous oxide that predominantly originate from a limited number of activities: livestock farming (enteric fermentation and manure), synthetic fertilizer application, and farming on drained organic soils. EU agriculture emissions have been stagnant for the past two decades, and under current measures projected to decrease only to a minor extent in the decades to come.

We therefore call upon the Agriculture and Fisheries Council to:

- Ramp up climate ambition in the agricultural sector by setting a **target for emission reduction** in the sector;
- Enable the **shift away from subsidies for harmful practices**, instead redirecting these funds to nature- and climate-friendly activities;
- Avoid partial technological fixes and instead prioritize and enable a system-wide transformation that addresses the root causes of the environmental, social, and economic pressures exerted by the current agricultural system.

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

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