



To: Executive Vice-President Frans Timmermans

Brussels, 20th July 2020

Subject: Request for a meeting re. CAP alignment with the European Green Deal

Dear Executive Vice-President,

This European Commission has made the European Green Deal the overarching priority of its mandate, calling climate and environmental challenges *"this generation's defining task"*. Our organisations strongly support this commitment to a climate-neutral, healthier and more sustainable Europe.

The Common Agricultural Policy (CAP) should be a crucial instrument to deliver on these ambitions. However, there is undeniable evidence that a fundamental reform is required: the current CAP is failing to deliver on [climate](#), [water](#), [air quality](#), and [biodiversity](#), including [farmland biodiversity](#) and [wild pollinators](#).

Independent assessments of the 2018 CAP reform proposals have overwhelmingly found that the framework proposed by the previous Commission will not deliver progress on climate mitigation and adaptation, natural resources protection, or biodiversity restoration, while ensuring a just transition for all farmers. Such criticism has come among others from the [European Court of Auditors](#), [scientists](#), [think tanks](#), [CAP experts](#), [environmental NGOs](#), and [producers organisations](#). The new CAP framework must include stronger governance and stricter environmental safeguards to deliver on the Green Deal.

This is why our organisations are calling on you to take action to fully align the CAP reform proposal with the Commission's own climate, environmental and biodiversity commitments. You have the required powers to do so under the Treaties and the legislative process allows sufficient time to act.

The Commission's [proposed course of action](#), i.e. to rely on co-legislators to remedy the shortcomings of its legislative proposal and on the goodwill of Member States to voluntarily deliver the Commission's Green Deal commitments through CAP Strategic Plans, amounts to a denial of its powers and responsibilities, and seriously questions this Commission's commitment to delivering the Green Deal. You have a legal, political and moral imperative to act.

We are therefore writing to request an opportunity to present our assessment of the shortcomings of the current CAP reform proposal and to discuss possible ways to address them within the current legislative timeframe, some of which we already outline for your consideration in the Annex to this letter.

We strongly hope that you will heed our calls, in line with President von der Leyen's commitment a year ago that her *"Commission will listen to the people of Europe and be bold"*, and with the *"check against delivery approach"* [promised to the European Parliament](#) in connection with the Green Deal.

We remain at your disposal to organise a meeting at your earliest convenience.

Yours sincerely,

Ariel Brunner
BirdLife Europe
Senior Head of
Policy

Anais Berthier
ClientEarth
Head of EU
Affairs

Jeremy Wates
EEB Secretary
General

Jagoda Munić
Friends of the
Earth Director

Jorgo Riss
Greenpeace
European Unit
Director

Eduardo Cuoco
IFOAM
Organics
Europe Director

ANNEX TO LETTER REQUESTING A MEETING ON CAP ALIGNMENT WITH GREEN DEAL

Need to align CAP reform proposal with Green Deal

Our organisations have all expressed concerns regarding the current misalignment between the common agricultural policy (CAP) reform proposal and the declared climate, environmental and biodiversity ambitions of the European Green Deal, from a legal, political and policy perspective:

- [ClientEarth](#) has warned against the legal risks associated with the current inconsistency between the CAP reform proposal and the EU Green Deal;
- [The European Environmental Bureau](#) has raised the risk of greenwashing and called on the Commission to amend its CAP proposal to ensure political and policy coherence with the EU Green Deal;
- [Birdlife Europe](#) has called for a rapid transition to nature-friendly farming, in line with the targets of the Biodiversity Strategy;
- [Friends of the Earth Europe](#) has stressed the need for rapid, systemic change to achieve farming which respects the world's finite resources and is fair to farmers and consumers;
- [Greenpeace](#) has called to scrap this CAP reform and start again to build a system that protects small-scale farmers and nature.
- [IFOAM Organics Europe](#) has highlighted the need to put the principle of 'public money for public goods' at the heart of the CAP and to reward organic farmers for the services they deliver through both pillars.

In fact, the timeline of the new CAP, which would govern the rules applicable to EU financial support to the agricultural sector until 2027, runs parallel to the timeline of the Farm to Fork and Biodiversity, which set EU-wide ambitions for 2030, making them both thematically and chronologically inseparable.

To date, we deeply regret to see that, while recognising that the future CAP would be a [key action](#) in delivering the European Green Deal, and acknowledging that the current CAP reform proposal [does not stand up](#) to the Green Deal promises, the Commission has not taken [any](#) convincing action to align the CAP strategic plans regulation proposal with the ambitions of the European Green Deal. This inaction is taking the risk that the European Green Deal partly becomes a greenwashing exercise.

Further to concerns previously expressed by our respective organisations, we detail below three alarming examples of misalignment between the proposed new CAP and the EU Green Deal, on which we urge this Commission to take action to ensure full coherence.

Absence of Green Deal targets in CAP legislative proposal

The absence of the Green Deal agriculture-related targets in the CAP Reform proposal is critical because EU climate, environmental and biodiversity objectives¹ are the **very core** of the new performance-based delivery model promoted by the Commission for the future CAP, as they are one of the **few criteria** against which the Commission will be empowered to reject CAP national strategic plans².

In the proposed model, which would leave significantly more freedom to Member States, it is **essential** for the future CAP to deliver EU-wide climate, environmental and biodiversity progress³, that the Commission secures the effective power to require national strategic plans to attain clear, quantified and time-bound corresponding objectives, and reject them if they fail to do so. Spending must also be linked to these targets, so where national governments cannot demonstrate due efforts to reach them, penalties would apply.

¹ We refer here, to the "general objective" set out in article 5 (b), and the corresponding "specific objectives" set out in article 6 (d), (e) and (f) of the CAP Strategic Plans Regulation (CAP SP) Proposal

² Under article 106 of the CAP SP Proposal.

³ In light of the very insufficient drafting of the no backsliding principle laid out in article 92 of the CAP SP Proposal.

These deficiencies in the CAP SP proposal are not new: in 2018, the [European Court of Auditors'](#) (ECA) had alerted the previous Commission that the proposal fell short of “*clear, specific and quantified EU objectives*”, therefore “*lacking the elements of an effective performance system*”. The ECA warned that the proposal “*[did] not reflect a clear increase in environmental and climate ambition*”, shedding doubt on the structural ability of the current CAP proposal to effectively deliver any environmental and climate progress.

Now that the European Commission has made the European Green Deal its political pledge, and actually came up with specific, quantified and time-bound agriculture-related targets in its Farm to Fork and Biodiversity Strategies, the fact it has not yet proposed to include them in the CAP legislative proposal is simply beyond understanding.

The recent public declaration by a Commissioner that the Farm to Fork Strategy [targets might be revised](#) under certain conditions, has only enhanced our concerns.

Weak safeguards against farming practices and subsidies harmful to the environment or climate

Public policy and money must not support or, worse, promote practices which are clearly contributing to the climate and biodiversity crises, polluting our environment, or depleting natural resources. As an absolute minimum for policy coherence between the new CAP and the Green Deal, stricter legal safeguards are needed to end CAP support for intensive livestock production, farming on degraded peatlands, or over-abstraction of water for irrigation – to name but a few examples.

In addition, common EU-level standards are necessary in the CAP conditionality to prevent a race to the bottom and ensure a level playing field across the EU in enforcing basic good agronomic and environmental practices. This should include strictly protecting permanent grasslands and peatlands, setting a maximum stocking density, dedicating space for nature on all farms, and mainstreaming basic integrated pest management practices such as crop rotations, buffer strips and constant soil cover.

Insufficient ringfencing of funds and insurances of qualitative spending

Eco-schemes have been highlighted as a key instrument to implement the EU Green Deal. Yet, the CAP proposal does not require Member States to dedicate minimum funds to them, nor does it set clear quality criteria or mechanisms to review and ensure their effectiveness. For the new eco-schemes to deliver on the promises of the European Green Deal, they must be based on sound science and sufficiently funded, with at least 50% of each pillar reserved for environmental and climate action. In addition, in line with the Biodiversity Strategy, €15bn per year should be reserved for targeted funding for effective biodiversity measures.

Furthermore, since the CAP is funded by public money from the EU budget, member states must be accountable to the Commission for how the money is spent and whether it contributes to achieving EU environmental objectives and laws. This requires improved accountability and transparency mechanisms in the CAP, including the obligation for governments to monitor progress against the EU Green Deal targets and a clearer link between spending and impact indicators.