



## **Open letter: CAP Simplification Rules – we were consulted but not heard**

Brussels, 10 April 2024

Dear European Commission President Ursula von der Leyen,

European Coordination Via Campesina and IFOAM Organics Europe both represent farmers who preserve the diversity of our countryside and put high quality and sustainable food on the table of Europeans. Both organisations take part in the strategic dialogue on the future of agriculture and write to you today about the Commission's proposal on CAP simplification rules.

We hereby declare that, while reducing administrative burdens for farmers is necessary, this must not result in lower environmental ambitions and further exacerbating the impact of climate change and of the biodiversity collapse that farmers already witness. On the contrary, any revision of European legislation should strengthen and protect the most sustainable, organic and agroecological models of agriculture and prepare the necessary transition of the European agri-food system. The proposed simplification rules will ultimately only exacerbate discontent in the farming community as they neither support farmers in increasing their resilience nor do they address the real issues that farmers face, which is the lack of fair prices for their products and lack of a decent income. To enable the adoption of sustainability practices on farms it is necessary to ensure fair prices to farmers, that at least cover their production costs and remunerate them for the public goods they deliver. We believe that this is not a contradiction with high environmental ambitions for farmers within the CAP.

The CAP should regulate markets and ensure fair and stable prices, protected from speculation. We welcome the announcements of measures to strengthen the position of farmers in the value chain such as the observatory of prices, costs and margins, the possible modification of the Unfair Trading Practices Directive as well as the measures contained in the Common Market Organisation Regulations. These proposals must now be made more precise and concrete to allow their effective implementation. Moreover, CAP support should be distributed fairly and promote a true transition towards organic and other sustainable and agroecological practices by providing a real comparative advantage to farmers engaged in sustainable methods of production such as organic farming.

We also raised these points during the short consultation period that preceded the publication of the CAP simplification rules, but most of them were not considered. We represent 50% of the farming organisations that were consulted, but almost none of our concerns are reflected in the final output. We

are deeply concerned that our participation in the consultation is used to legitimize the process and proposal on CAP simplification, which will mostly result in lowering the environmental delivery of the CAP, and ultimately, its legitimacy.

Indeed, this simplification process would result in a significant change of the CAP measures, so considerable that it could be compared to a small CAP reform. However, neither the necessary impact assessment, nor an adequate, time-sufficient consultation that should accompany such a reform have been carried out. The Commission must act fast to address farmers' difficulties, but the process that led to the CAP simplification proposed rules required more representative and integrative democratic procedures.

As organizations representing farmers and committed to their well-being, as well as that of consumers and the environment, we urge the Commission, to ensure that CAP simplification rules and any actions taken are in line with achieving environmental, economic and social sustainability in the European food and farming system.

We would appreciate having the chance to further address the above-mentioned issues and potential solutions in a meeting at your earliest convenience.

Sincerely,

Andoni Garcia and Morgan Ody for the Coordinating Committee of ECVC

Jan Plagge, IFOAM Organics Europe, President