



Organic farming in Europe has developed significantly in the last decade: in 2018, organic area made up 7.5 % of total EU agricultural land with 13,8 million hectares. Demand for organic products has also substantially increased; in ten years, citizens have more than doubled their consumption of organic and demand is outstripping supply. The EU market for organic food is growing steadily and has evolved from €11.1 billion in 2005 to €37,4 billion in 2018, even if it is still an infant industry in some Member States.

Organic farming delivers public goods in many areas, such as biodiversity, water quality, soil health and air quality. Organic farms sustain more jobs than conventional farms on average and contribute to the revitalisation of rural areas. Although there is strong market dynamics in some EU countries, policy support for organic farming is crucial to enable both organic production and demand to rise in a balanced way (push-pull approach), and to increase the provision of public goods. This dual role of the organic sector, the provision of organic food and public goods, is only partially addressed by CAP measures.

IFOAM Organics Europe welcomes the Biodiversity and Farm to Fork strategies, which provide European citizens with an engaging vision to build a sustainable, fair and resilient EU food production system. The CAP is the main policy instrument that could allow to reach many objectives of the Farm to Fork strategy, but it needs an important reform to become truly efficient in protecting biodiversity, reducing pesticides, antibiotics and fertilisers, and increasing organic production and consumption. To incentivise and help farmers transitioning towards more sustainable practices, the CAP should reward farmers based on their contribution to public goods. With proper CAP support in both pillars, the organic food and farming movement is convinced that most farmers will benefit from adopting agroecological practices and reducing the use of costly external inputs.

IFOAM Organics Europe welcomes the ambition to reach 25% of EU agricultural land under organic farming by 2030. This is an ambitious target, which is achievable with adequate CAP support for conversion and maintenance of organic farming at national level, in combination with measures to increase the demand for organic products through promotion schemes and green public procurements. IFOAM Organics Europe also welcomes the European Commission's commitment to design a new EU Action Plan for organic farming, which will highlight important measures, but which is not a substitute for adequate organic farming support within the CAP.

### Recommendation 1: Member States should introduce a national target for organic land in their CAP Strategic Plans

To reach 25% of organic land on average at EU level, the CAP Strategic Plan Regulation should ensure that Member States include in their strategic plans a relevant national target, and provide the necessary support through various interventions to have the means to reach it. Adequate budget should be provided to conversion and maintenance of organic farming at national level, either through rural development measures as in the current CAP (pillar 2), or through newly-introduced eco-schemes (in pillar 1), or a combination of both.

IFOAM EU favours a bottom-up approach where Member States would be free to decide the adequate level of ambition to increase organic land on their national territory, and the right mix of policy measures to increase both production and consumer demand in a balanced way. Nevertheless, to ensure organic farmers have a chance to benefit from CAP support in all EU countries, a national target on organic farming should be compulsory for Member States to have their Strategic Plans approved. The Commission, when evaluating the national strategic plans, should ensure that the ambition of the national target is a fair contribution to the EU target.

The CAP Strategic Plans should also describe other relevant measures, such as the establishment of **independent and well-funded Farm Advisory Services**, geared towards agroecology, to provide technical support to farmers who transition to organic farming or implement agroecological practices.

Already in February 2019, two amendments (AM 563 and 564) of the ENVI report foresee that Member States shall include in their CAP Strategic Plans an analysis of the organic agriculture sector and set up objectives to increase the share of agricultural land under organic management. These amendments represent a good basis and should be completed with a requirement for Member States to include in their Strategic Plans a national target for their organic sector by 2030.

# Recommendation 2: Enhance support for conversion and maintenance, in line with the national target, through rural development measures and/or eco-schemes

Conversion and maintenance support are available in almost all EU countries since the early 1990's and have played a major role in the development of organic farming in Europe: between 1998 and 2008, the organic area (in the EU-15 Member States) grew by 157,2% (Thünen Institute, 2010). Today most authorities in the Member States offer organic support payments under their national or regional rural development programmes (RDPs). They play an important role in covering certification or inspection costs, increased management efforts, training, and advice.

Organic farming support in the second pillar is available for a period of five to seven years, on a per hectare basis (co-financing between EU and MS/regions). In 2017, 55% of organic land area was supported, with an average payment of 215 €/ha. However, support levels differ widely between and within Member States, and according to farms' sizes and types. At a time when second-pillar money risks being severely cut, farmers need guarantees that they will be supported in their conversion, and for the public goods they deliver with payments for maintenance, no matter the Member State.

After assessing the level of support needed and fixing a target, Member States should ensure that allocated budgets match the expected growth in organic production. They will have the possibility to support organic farming through rural development measures in article 65 or through eco-schemes in article 28, or through a combination of both. The possibility offered by the new CAP to fund conversion and maintenance through Pillar 1 Eco-

schemes is an important innovation, and Member States should make the most of it, especially in countries where RD funds have proven to be insufficient.

It is crucial that support for maintenance is continued in all Member States, as support for conversion only does not offer farmers enough the long-term certainty and security, and as organic farmers should be rewarded for the public goods they provide to society, such as the preservation of natural resources (soils, water, biodiversity, etc.).

## Recommendation 3: Better define eco-schemes and ensure complementarity with pillar 2 Agri-environment-climate commitments

Eco-schemes offer new possibilities to reward public good delivery and should encourage in priority farm system approaches which deliver a variety of environmental benefits, such as organic farming. Eco-schemes are a crucial new tool to help farmers to contribute reaching Farm to Fork and Biodiversity strategies targets.

Organic farming is the only voluntary scheme legally defined and regulated at EU level, which makes it easy to implement and control. But it also is the only whole farm approach, thereby providing a range of societal and environmental benefits. Organic farmers use legumes to fix nitrogen, biological controls against weeds and pests, and integrate livestock with cropping systems to make use of clover/grass leys and pasture. This unique holistic approach explains the good results of organic farming in terms of genetic diversity, soil conservation and carbon sequestration, water quality, and maintaining and enhancing biodiversity.

Member States need to leave open the possibility for farmers to receive funds for conversion/maintenance and in complement to participate to other eco-schemes (e.g. related to land cover, legumes in rotations, etc.). In addition, all farmers should have the right to voluntarily participate to different eco-schemes and pillar 2 agri-environmental measures which complement and re-enforce one another and allow for further improvement of the impact of farms on the environment. A combination of a whole-farm approach (such as organic) with more targeted practices should not be considered as "double funding", and it would be unfair that farmers implementing less ambitious measures receive more payments than farmers engaging in deeper re-designs of their farms. In the guide 'Using Eco-schemes in the new CAP: a guide for managing authorities', IFOAM Organics Europe gives examples of practices that could be supported through Eco-schemes, and advice on how to avoid double funding, choose the right measure and payment

## Recommendation 4: Extend the possibility to offer payments on a premium logic in rural development measures, rather than the limitative cost incurred/income foregone logic

Conversion and maintenance aids are designed to compensate farmers for additional costs incurred and income foregone. They do not always cover all the extra costs, nor fully take into account the reduction in yields organic farmers might face.<sup>1</sup>

Moreover, in the second pillar, different options exist for combining organic support payments with Agri-environmental payments, underlining the comparative advantages of organic farming in providing public goods. But the "lost revenue" calculation logic that prevails prevents the policy from delivering strong incentives for farmers to transition towards organic farming and agro-ecology.

IFOAM Organics Europe believes that the CAP legislative proposal for the post-2020 period fails to provide farmers with strong incentives to convert to and maintain organic farming. According to the organic movement, both pillars of the CAP should facilitate the delivery of public goods for the environment, climate and animal welfare.

The Commission's proposal on the CAP indicates that payments for eco-schemes (under pillar 1) could be calculated on a premium/incentive basis, rather than on the "income foregone/lost revenue" logic. But it does not open this possibility for rural development measures such as agri-environmental schemes.

#### Recommendation 5: Earmarking of the CAP budget for environmental and climate action across the two CAP pillars

The flexibility given to Member States when it comes to the share of the CAP budget dedicated to environmental measures risks creating a big imbalance to the CAP design. The absence of a common level of ambition (defined at EU level) and of a level-playing field will be foreseeable source of tension between Member States. Faced with the risk of losing competitiveness to its neighbours, a country is likely to "protect" its farming sector by lowering its environmental ambition. The most effective way to avoid this negative incentive is to set the bar high. IFOAM Organics Europe strongly encourages to set a mandatory minimum requirement for each CAP Strategic Plan to dedicate least 70% of the budget to measures on the climate, environment, and animal welfare. Member States should be free to decide on the share of 1st and 2nd pillar money going to the environment and climate objectives and the weight between the pillars, as long as 70% of their total national envelope is dedicated to them.

<sup>&</sup>lt;sup>1</sup> DG AGRI, 2013; Pohl, 2009

While IFOAM Organics Europe welcomes the possibility to ringfence 20 to 30% of the first pillar envelope for eco-schemes as suggested by the European parliament and recently endorsed by the Commission, the organic movement reiterates is preference for earmarking across the two pillars.

#### **SUMMARY OF IFOAM ORGANICS EUROPE CAP RECOMMENDATIONS:**

**™** Member States should have to introduce a national target for organic land in their CAP Strategic Plan

<u>Namer States should describe in their CAP strategic plans the relevant policy mix to increase both production and demand for organic products, and to ensure independent and well-funded Farm Advisory Services, geared towards agroecology</u>

Nember States should provide an adequate level of support for maintenance and conversion to organic farming, at the minimum at same level as in the 2014-2020 period (no backsliding principle)

≥ Eco-Schemes should be better defined, including their ambition and eligibility criteria, and should be designed to compatible and complementary with 2<sup>nd</sup> pillar agroenvironmental measures

□Going beyond "lost revenue" logic to reward public goods through incentives, and extend this possibility to 2<sup>nd</sup> pillar measures

**△Ambitious environmental and climate ringfencing over the two pillars**