

IFOAM EU Suggested Responses to the Commission Public Consultation on Modernising and Simplifying the Common Agricultural Policy (CAP)

IFOAM EU is calling for a transformation of European Food and Farming – Join Us

The European Commission is currently planning for the next reform of the Common Agricultural Policy. As part of the process a [public consultation](#) gives farmers and citizens a say on the future of the CAP. **The consultation is open until 2 May 2017.** Submissions will be used to set the direction of the next CAP reform post-2020. The public consultation, accompanied by an [inception impact assessment](#), is one of the first steps in formulating the next reform which will be set out in a forthcoming Commission Communication expected to be published in the last quarter of 2017. It can also be assumed that this process will influence upcoming discussions on the next EU budget post 2020.

IFOAM EU is [calling](#) for the next CAP reform to deliver healthy farms, people and planet based on the principle of public money for public benefit. In January 2017 IFOAM EU, together with its organic farming association members from across Europe, set out the European organic movement's Vision for delivering public goods under the next CAP in an [open letter](#) to the Commissioner for Agriculture and Rural Development Phil Hogan and key EU officials and representatives from the European Parliament and the Agriculture Council. The open letter called on the EU Institutions to move the CAP post-2020 to a new model of farm payments which promotes sustainable farming systems based on agroecological outcomes. This includes:

- A public goods payment framework that incentivises and rewards farmers delivering a range of environmental and socio-economic services at farm level (100% EU financed)
- Complementary supporting measures covering issues related to farm advice and extension services, supply chain development, infrastructural investments, innovation, organic farming payments, and promotional activities etc (nationally co-financed)
- A single pillar structure with one budget, fully orientated to promoting agroecological outcomes - public goods payments representing 80% of the overall EU spending and supporting measures accounting for the remaining 20% by 2034

The results of the public consultation on the review of the organic regulation clearly shows that the power of public consultations should not be underestimated. Food and farming voices from the organic movement and like-minded groups are essential to set out a progressive pathway for the future of agriculture policy in the EU. Consequently, we strongly urge you to make your voice heard in the consultation process. Many IFOAM EU member organisations have already come together with other civil society organisations to call for the [Reform of European Agricultural Policies - Good Food, Good Farming – Now!](#) This call to civil society remains open so please contact IFOAM EU for further information or if you want to sign on.

Below IFOAM EU is proposing responses to the consultation questions based on the IFOAM EU Vision's for public goods under the next CAP and existing CAP positions which continue to remain valid. We encourage you to use these recommendations as a basis for your own submissions - taking account of your national or regional context. Both organisation and individual citizen submissions are welcome. For further information please contact stephen.meredith@ifoam-eu.org

B. AGRICULTURE, RURAL AREAS AND THE CAP TODAY

1. Which are the most important challenges for EU agriculture and rural areas?

at most 3 choice(s)

- ☐ Fair standard of living for farmers
- ☒ Adaptation to trends in consumer/societal demands
- ☒ Pressures on the environment and on natural resources
- ☒ Climate change (mitigation and adaptation)
- ☐ Lack of jobs and growth in rural areas
- ☐ Uneven territorial development throughout the EU

IFOAM EU Justification

Aligns with IFOAM EU's demands for a public goods payment framework that incentivises and rewards farmers delivering a range of environmental and socio-economic services at farm level based on new deal between farmers and citizens.

2. Which of the current CAP policy tools are best suited to meet the challenges identified above?

at most 5 choice(s)

- ☐ Decoupled payments to farmers
- ☐ Coupled support
- ☒ Support for Rural Development environment and climate action in agriculture and rural areas
- ☒ Support for Rural Development investments in physical and human capital in agriculture and rural areas
- ☐ Trade measures
- ☐ Market safety nets (e.g. market intervention)
- ☐ Risk management schemes
- ☐ Support for integration into producers' organisations
- ☒ Regulatory approaches (such as standards and rules)

IFOAM EU Justification

Promotion of environmental and climate action, investment in physical and human capital is strongly aligned to IFOAM EU's demands for a public goods payment framework. Regulatory approaches imply that basic legislation under cross compliance should remain in place and some cases be strengthened e.g. the Sustainable Pesticide Use Directive and Water Framework etc. Decoupled payments to farmers and coupled support would maintain the status quo. We do not select safety nets for markets because current tools are not adequate. We recommend not to select risk management schemes as such tools - in particular insurance schemes - can end up promoting moral hazard and subsidising the financial services industry. (We elaborate further on the market question under question 33).

3. To what extent does the current CAP successfully address these challenges?

- ☐ To a large extent
- ☐ To a fairly good extent
- ☐ To some extent only
- ☒ Not at all
- ☐ Don't know

IFOAM EU Justification

We agree that the current CAP is helping in different ways to address some of the challenges facing agriculture through for example support for the development of short supply chains, action on environment and climate, development of organic farming etc. However, it is not going far enough. Therefore, we recommend selecting “Not at all” to send a strong message on the need for a fundamental reform of the CAP to support a transition towards a more sustainable food system.

4. Which of the following do you think are the most important contributions of farmers in our society?

at most 3 choice(s)

- ☐ Ensuring that enough food is available
- ☒ Supplying healthy, safe and diversified products (quality of food)
- ☒ Protecting the environment (soils, water, air, biodiversity) and landscapes
- ☒ Addressing climate change (both mitigation and adaptation)
- ☐ Contributing to renewable energy
- ☐ Maintaining economic activity and employment in rural areas
- ☐ Contributing to EU trade performance
- ☐ Ensuring the health and welfare of farm animals

5. To what extent do you agree with the following statement:

	Largely Agree	Partially Agree	Partially Disagree	Largely disagree
Farm income is still significantly lower than the average EU income	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU farmers face stricter requirements than non-EU ones	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers get a limited share of the prices consumers pay	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers need to make heavy investments for their businesses to be viable	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

6. Which are the most important environmental challenges faced by agriculture?

at most 3 choice(s)

- ☒ Reduction of soil degradation
- ☒ Protection of biodiversity
- ☒ Preservation of genetic diversity such as traditional/old varieties and breeds
- ☐ Reduction of water pollution
- ☐ Rationalise use of water
- ☐ More sustainable use of pesticide and fertilisers
- ☐ Decrease air pollution
- ☐ Environmental risks such as fires, floods etc.

IFOAM EU justification

Choosing the three most important environmental challenges is extremely difficult. We have chosen those that are critically in danger due to current human activities, but the selection is not perfect.

7. To what extent does the current CAP successfully address these environmental challenges?

- ☐ To a large extent
- ☐ To a fairly good extent
- ☐ To some extent only
- ☒ Not at all
- ☐ Don't know

IFOAM EU justification

Concrete instruments to address environmental challenges are still not at the heart of the CAP. In total monetary terms, the environment represents 30% of the CAP budget, but with varying degrees of ambition from basic greening requirements under Pillar 1 (20%) and organic and advanced agri-environmental measures (10%).

8. What are the main barriers to becoming a farmer?

at most 5 choice(s)

- ☒ Low profitability
- ☒ Lack of available land
- ☒ High prices of land
- ☐ Land regulation
- ☐ Difficulties to access credit
- ☐ Complexity of insurance schemes
- ☐ Inheritance laws
- ☐ Taxation
- ☐ Administrative requirements
- ☐ Access to updated knowledge/technologies
- ☐ Image of the sector

9. What do you see as major drivers for innovation in agriculture, forestry and the rural economy?

at most 5 choice(s)

- ☒ Access to vocational training and relevant information
- ☒ Access to advisory services delivering farm-tailored solutions
- ☐ Dissemination of knowledge
- ☒ Financial /investment incentives / support for innovative projects
- ☐ New technologies and agricultural inputs
- ☐ Support for adjusting to new societal demands (i.e. nutritional guidelines)
- ☐ Support to the development of the circular economy
- ☒ Better involvement of producers throughout the value chains (up until the consumer)
- ☒ New partnerships between different actors (i.e. between farmers, civil society, researchers)
- ☐ Research and the provision of knowledge targeted to farmers' needs

10. Since 2003, the Farm Advisory Service (FAS) aims at helping farmers to better understand and meet EU rules and good agricultural and environmental conditions. How would you characterise the current situation of the FAS in your respective territory, as regards...

	Satisfactory	Neutral	Not Satisfactory	Don't know
Availability of advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Access to advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Quality of the service provided	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Independence of advisors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Transfer of knowledge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Dissemination of new knowledge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

IFOAM EU justification

The implementation of the Farm Advisory Service (FAS) varies from country to country. IFOAM EU will not answer this question, but we recommend you to answer it from your own national or regional context.

11. To what extent did recent CAP reforms pay sufficient attention to Policy Coherence for Development?

	To a large extent	To a fairly good extent	To some extent only	Not at all	Don't know
Overall coherence with EU Development Policy and Humanitarian Action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU exports to developing countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU imports from developing countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Impact on local agricultural production in developing countries including land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The availability and affordability of agricultural goods in developing countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

IFOAM EU justification

Although there have been some improvements in coherence with development policy, these changes have not gone far enough to claim that sufficient attention is paid to them.

12. What are the main problems/obstacles preventing the current policy from successfully delivering on its objectives? What are the drivers behind these problems?

1500 character(s) maximum

CAP is currently ill-equipped to confront the multitude of demands that society makes of farmers & at the same time create a more positive environment for diversified markets & balanced rural development. The policy remains primarily orientated towards the international trade agenda. Farmers' vulnerability to price volatility shows that aligning the CAP with commodity-led globalised markets is not a solution for farmers or citizens. Therefore, it is largely unable to effectively support farmers producing both public & private goods because of a disproportionate emphasis on international price competitiveness focused on low-cost commodity production (largely untargeted under Pillar 1), public goods payments primarily based on single practices rather than on targeted farm system approach (with only partial targeting under Pillar 1 & 2), payments calculated in terms of income forgone & costs incurred, not on the value of public goods delivered (due to alleged WTO 'green box' restrictions under Pillar 1 & 2), greater preference from Member States to opt for 100% EU-financed measures under Pillar 1 (due to co-financing requirements under Pillar 2). Overall the main problem stems from the fact that sustainability is not at the heart of the CAP & many tools & instruments are generally not complementary, sometimes contradictory & in many cases are competing with one another. The inability of the current CAP architecture to implement a fully integrated management approach that delivers public money for public goods demonstrates the need to re-orientate EU agricultural spending towards the sustainability challenges facing the agri-food sector.

13. Which elements of the current CAP are the most burdensome or complex and why?

1500 character(s) maximum

A lack of coherence & consistency between different CAP instruments for supporting good environmental & socio-economic outcomes impedes the limited possibilities available under the policy. In the first instance, cross compliance is controlled in an uncoordinated way - with different inspectors controlling in different periods & often with disproportionate penalties for minor non-compliances. This makes it extremely difficult for the rules & enforcement procedures to gain acceptance amongst the farming community. At the same time, the introduction of the Pillar 1 greening does not properly incentivise farmers to make the transition towards more sustainable practices. In addition, the measures lack any real ambition & allow many questionable exemptions. Nor is there adequate reward for farmers that are already delivering good outcomes, for example in terms of environmental performance & climate action. In many cases, the introduction of greening has led to a lack of investment in ambitious environmental & climate measures under Pillar 2 (Rural Development Programmes) due to the fear of so called "double funding" despite low-level requirements under Pillar 1 greening. There are also many uncertainties about the combination of different rural development measures such as organic farming (Measure 11), with agri-environment-climate (Measure 10). These inconsistencies & incoherencies make it extremely difficult for farmers to make sound decisions on all aspects of sustainability for their entire farm enterprise & at the same time meet societal expectations. Greater efforts are needed to make public goods an integral, coherent & integrated part of the CAP & not simply an add-on which competes with other parts of the policy.

C. OBJECTIVES AND GOVERNANCE

14. The work of the European Commission focuses on 10 priorities for 2014-2020, most of which are relevant to the CAP http://ec.europa.eu/priorities/index_en

Please indicate the most relevant priorities for which the CAP should do more.

at most 3 choice(s)

- ☐ Boosting investment, growth and employment
- ☐ Improving connectivity and digitalisation of the rural economy
- ☐ Mitigating and adapting to the impact of Climate Change and providing renewable energy
- ☐ Strengthening the EU Single Market
- ☐ Participating in world trade
- ☐ Help addressing challenges related to migration

IFOAM EU justification

Many of key priorities are missing from the list of priorities proposed e.g. better achievement of good environmental and socio-economic outcomes – putting sustainability at the heart of the CAP. **We recommend not to answer this question.**

15. Which of the following should be the most important objectives of the CAP?

at most 5 choice(s)

- ☐ Ensuring a fair standard of living for farmers
- ☐ Addressing market uncertainties
- ☐ Foster competitiveness and innovation of agriculture
- ☐ Securing food supply at reasonable prices for consumers
- ☒ Encouraging the supply of healthy and quality products
- ☒ Contributing to a high level of environmental protection across the EU
- ☒ Mitigating and adapting to the impact of climate change
- ☐ Developing rural areas while taking care of the countryside
- ☐ Achieving a balanced territorial development

IFOAM EU justification

Aligns with IFOAM EU's demands for a public goods payment framework that incentivises and rewards farmers delivering a range of environmental and socio-economic services at farm level based on new deal between farmers and citizens. *(We elaborate further the market question under question 33).*

16. Do you see the need to add objectives for a modernised CAP; if yes, which ones?

1500 character(s) maximum

The forthcoming CAP reform must be closely aligned to the UN's 2030 Agenda for Sustainable Development. This alignment would aim to better orientate the CAP towards more tangible, environmental & societal outputs of farming to help keep farmers in business, provide high-quality food, & contribute to EU goals regarding rural viability, climate change and the environment. For too long, the CAP has not been ambitious enough in working to meet key sustainability targets set out in EU legislation & in international agreements e.g. UN Climate Agreement, the International Treaty on Plant Genetic Resources for Food & Agriculture. This also relates to EU commitments enshrined in the TEFU notably defining & implementing environmental protection requirements with a view to promoting sustainable development (Article 11) & the protection of human health (Article 68 (1)). More clear objectives are needed to ensure better implementation of existing legislation, including the Nitrate Directives, Water Framework Directive, National Emissions Ceilings Directive, Sustainable Pesticide Use Directive, the EU Birds & Habitats Directives, the EU Biodiversity Strategy, Workers Health & Safety Directive. Objectives related to social rights, sustainable soil management, animal welfare, remain largely absent from CAP or EU legislation overall. Objectives need to effectively align the CAP with the Voluntary Guidelines on Responsible Governance of Tenure of Land, Fisheries & Forests. Overall a modernised CAP must work towards fully implementing the principle of public money for public good based on clear objectives that enable a new deal to be fostered between farmers & citizens that promote food & farming resilience.

17. Do you agree with the following statement: "It makes sense to have a Common Agricultural Policy because we need ..."

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Common rules, as part of the Single Market (market organisation, trade, competition rules, food safety standards)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common objectives to tackle cross-border challenges (food security, environment, climate change, biodiversity...)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A common budget as it is more efficient	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic, social and territorial cohesion and solidarity among Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common positions at international level making the EU a stronger global actor	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A common framework for sharing best practices, research results, innovative ideas, mutual learning	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. At which level do you consider that the following CAP objectives should primarily be dealt with?

	EU level	National level	Regional/local level	Don't know
Ensuring a fair standard of living for farmers	X ₁	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing market uncertainties	X ₁	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster competitiveness and innovation of agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Securing food supply at reasonable prices for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging the supply of healthy and quality products	X ₁	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a high level of environmental protection across the EU	X ₁	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mitigating and adapting to the impact of climate change	X ₁	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing rural areas while taking care of the countryside	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a balanced territorial development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

IFOAM EU justification

We focus on what we identify as the key CAP objectives to be achieved at EU. Others we leave blank as it may depend on national or regional contexts. If in doubt we suggest to choose EU level.

D. AGRICULTURE, RURAL AREAS AND THE CAP TOMORROW

19. Do you agree with the following statements:

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Farmers need direct income support	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other policies can have a strong impact on agricultural income (e.g. heritage/tax law, social and pension systems)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Agricultural policy should deliver more benefits for environment and climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted investments to foster restructuring and innovation should be supported	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving farmers' position in value chains (including addressing Unfair Trading Practices)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

IFOAM EU Justification

We suggest to answer “partially disagree” to the statement that farmers need direct incomes as we understand it as justifying the status quo. For the statement agricultural policy should deliver more benefits for environment and climate change “Fully agree” is selected based on the argument that public goods delivery should be a source of income for farmers under a reformed CAP. Regarding other policies, we say “Don’t know” because situation varies from country to country and put “Don’t Know” for restructuring and innovation because they are not mutually inclusive.

20. Do you think that the following actions under the CAP could improve the competitiveness of farmers?

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Supporting the development of futures markets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing transparency in the agricultural markets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the integration of farmers in Producer Organisations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for Research & Innovation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying administrative procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

21. Which of the following criteria are most relevant when allocating direct support?

at most 5 choice(s)

- ☐ Specific products and/or
- ☐ sectors Risk management tools
- ☐ Compensation to farming activities in Areas with Natural Constraints/ High Nature Value
- ☐ Areas Territories with higher agricultural potential
- ☒ Practices with the highest environmental/climate benefits
- ☒ Linkage to standards (e.g. food safety, labour)
- ☐ An equal level of support for farmers within the same territory
- ☐ Small producers
- ☐ Limit in support for large beneficiaries capping)
- ☒ Young Farmers

IFOAM EU justification

Aligns with IFOAM EU's demands for a public goods payment framework that incentivises and rewards farmers delivering a range of environmental and socio-economic services at farm level based on new deal between farmers and citizens. We recommend not to select risk management or to give greater emphasis on risk management tools, such as insurance schemes that can end up promoting moral hazard and subsidising the financial services industry. *(We elaborate further the market question under question 33).*

22. Which actions could further improve the EU export performance?

at most 3 choice(s)

- ☐ Export promotion
- ☐ Export credits
- ☐ Specific action on Geographical Indications
- ☐ Further trade liberalisation
- ☐ Address non-tariff barriers
- ☒ No action needed

IFOAM EU justification

The CAP remains primarily orientated towards the international trade agenda. *(We elaborate further the market question under question 33).*

23. Considering consumer and wider societal demands, where can the linkage between CAP and standards be improved?

at most 3 choice(s)

- ☐ Food safety standards
- ☐ Human nutrition standards and guidelines
- ☐ Standards for fair trade products
- ☒ Standards for organic products
- ☐ Environmental and climate standards
- ☐ Standards for the use of antimicrobials/pesticides
- ☐ Animal and plant health standards
- ☐ Animal welfare standards
- ☐ Labour standards

IFOAM EU justification

We recommend to select only standards for organic products to send a clear message of the contribution of organic farming to consumer and wider societal demands and hence the need for greater recognition between the organic standards and the CAP.

24. When it comes to meeting higher production standards, do you agree with the following statements?

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Enhanced results can be achieved with financial incentives on a voluntary basis, without increasing mandatory levels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If mandatory levels are increased, farmers need support	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers have to respect stricter rules without specific financial support	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Awareness campaigns are needed to raise the willingness of consumers to pay more for farmers' respect of stricter standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

25. For which of the following environmental protection objectives should the CAP do more?

at most 3 choice(s)

- ☒ Prevention and reduction of water pollution (pesticides, fertilisers)
- ☐ Sustainable use of water
- ☐ Prevention of environmental risks such as floods
- ☒ Prevention of biodiversity loss
- ☒ Prevention and reduction of soil erosion
- ☐ Avoiding soil salinization, compaction and desertification
- ☐ Contribution to the Air Quality Plans

26. Which are the most important objectives for the CAP to better address climate change?

at most 3 choice(s)

- ☒ Reducing Green House Gas (GHG) emissions in the agricultural sector
- ☒ Fostering carbon conservation and sequestration in agriculture and forestry
- ☒ Improving climate change adaptation and enhancing the resilience of agriculture production systems
- ☐ Promoting afforestation and sustainable forest management
- ☐ Providing sustainable renewable energy resources
- ☐ Promoting research to address plant and animal diseases linked to climate change
- ☐ Promoting diversification of farming systems

27. In which of the following areas do you consider that the CAP should strengthen its support to sustainable forest management?

at most 3 choice(s)

- ☐ Forest fire prevention and restoration
- ☐ Mobilisation of forest biomass for the production of material and energy
- ☒ Increase of the resilience and protection of forest ecosystems
- ☐ Afforestation/reforestation
- ☐ Prevention of natural disasters and catastrophic events in forests such as pests or storms
- ☒ Agroforestry systems

28. Where should the CAP improve its contribution for rural areas?

at most 5 choice(s)

- ☒ Fostering innovation through knowledge transfer, advice and vocational training
- ☒ Taking care of local know-how and products in line with EU's diversity and providing the basis for EU quality products
- ☐ Addressing local needs by supporting the provision of local infrastructure/services (e.g. health care, child care, transport)
- ☐ Fostering the economic viability of agriculture throughout the EU, avoiding concentration of production and people in certain areas
- ☒ Enhancing the interplay between local production and local markets
- ☐ Enhancing quality of life and social inclusion of rural inhabitants
- ☐ Strengthening governance and local development through bottom-up initiatives such as LEADER
- ☒ Fostering rural tourism and recreation, including through the provision of landscapes benefits, cultural values and traditional local food
- ☐ Creating and maintaining jobs in rural areas, including in primary agricultural production
- ☐ Providing connectivity and digital solutions
- ☒ Contributing to societal and cultural capital for rural areas to stay vital living spaces and to establishing mutually beneficial rural-urban linkages
- ☐ By helping SMEs to create jobs in rural areas

29. How can the CAP better help young farmers or other young rural entrepreneurs?

at most 3 choice(s)

- ☒ Supporting business start-up
- ☐ Providing transitional top-up payments to young farmers
- ☐ Improving access to financial instruments
- ☐ Providing more support for investments
- ☒ Supporting knowledge transfer, advice and vocational training
- ☐ Putting in place incentives to stimulate the cooperation between different generations
- ☐ Incentivising the transfer of farms
- ☒ Supporting new forms of cooperation

30. What would be the best way to encourage innovation?

at most 3 choice(s)

- ☒ Support the engagement of farmers in innovative projects
- ☐ Address the knowledge gap amongst farmers
- ☒ Support knowledge exchange through better access to advisory services, networking among farmers and demonstration farms
- ☒ Improve the technical competence and impartiality of advisory services
- ☐ Develop IT infrastructure for knowledge exchange
- ☐ Provide better access to finance / investment

E. WRAP UP: MODERNISATION AND SIMPLIFICATION

31. Do you think the CAP could be simpler if:

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Overlaps between Rural Development and other CAP Measures would be reduced	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Databases and technologies (remote sensing, smart phones) were better used to reduce the incidence of farm inspections	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E-government services were more extensively used	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lump-sum approaches were extended	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More choice was given to farmers in terms of environmental measures	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

IFOAM EU justification

We “largely disagree” because overlap between different measures as part of an overall policy mix is not a problem. This issue is more about consistency and coherence. In terms of giving more choice to farmers for environmental measures, we “partially disagree” because environmental goals should be based on multi-outcome instruments rather than single outcome instruments.

32. Do you have concrete ideas for simplifying the CAP and reducing the administrative burden for farmers, beneficiaries (or public administrations)? Please specify and explain the reasons behind your suggestions.

1500 character(s) maximum

Currently the costs arising from the negative effects of agro-industrial food production are neither considered by all producers nor fully accounted for by agri-food markets. This demonstrates the need for a CAP that incentivises & rewards the provision of public goods of benefit to farmers & citizens. For too long, the CAP has sought to tackle complex global challenges facing agriculture using often competing single outcome measures which have been somewhat effective, but largely inefficient. In contrast, a multi-outcome instrument based on a whole farm system approach, in combination with more targeted single outcome measures can better limit inefficiencies & be cost-effective. Many different challenges can be captured with one consistent policy instrument, greater synergies & possibilities to address trade-offs between measures can be achieved, practices can be better integrated into daily farm management, & there is significant scope to reduce transactions e.g. administration, control costs. Successive CAP reforms should move to mainstream multi-outcome approaches stimulated by a new model of farm payments based on agroecological outcomes. Incentivisation & reward of public goods at farm level should be part of an overall policy mix of sustainability compatible & complementary support measures.

33. Do you have more ideas for modernising the CAP?

1500 character(s) maximum

Fair living standards for farmers must be ensured through a reformed CAP targeting agroecological outcomes, rather than on untargeted support that has a limited impact on stabilising farm incomes. Instead agroecologically based payments must be supplemented with complementary support measures e.g. farm advice, supply chain development, investments, innovation, organic payments, promotion etc. All measures must be sustainability proofed. Investments in agroecological farm advice & innovation are essential to address the key challenges & must be strengthened to support such outcomes. EIP-AGRI, which aims to promote agroecological production system transition, must focus on these outcomes based on a holistic approach linked to farmer-led innovation done in partnership with researchers. It is critical that farmers can achieve adequate living conditions selling produce at a fair price whilst providing services to society. Current market measures tend to serve those seeking low commodity prices & must be re-designed & directed at local markets & quality food production. New market regulation & supply management concepts, that contribute to fair & stable prices such as quantitative production limits, must be assessed & further developed taking farmers, processors & consumers' interests into account. Calls to place greater emphasis on risk management tools, such as insurance schemes, can end up promoting moral hazard & channelling public money into the financial services industry.

34. Please feel free to upload a concise document (maximum 5 pages), such as a position paper.

The maximal file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is optional complement and serves as additional background reading to better understand your position.

Key document

[IFOAM EU vision paper: A CAP for healthy farms, healthy people, healthy planet; Public money must deliver public goods](#) January 2017

Further information

[CAP post 2013: Smart change or business as usual?](#) May 2010