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 European Commission  
 Brussels

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### **CAP implementation must enhance agro-ecological solutions, not support agrochemicals**

Dear Commissioner,

The Common Agricultural Policy (CAP) reform 2014-2020 is being hailed by EU and national leaders as a major success story for greener and fairer food and agriculture. However, the Commission's recently adopted CAP delegated acts and a declaration setting out the rules for implementing the "greening" demonstrates the lack of foresight to put in place a policy fit for confronting our current challenges and enhancing the sustainability of direct payments. Furthermore whereas civil society and key experts in food and agriculture have continued to highlight the need for an urgent shift towards agro-ecological approaches<sup>1</sup> that reduce our dependency on external inputs in the food chain, EU and national leaders have shown only a small ambition to mainstream agro-ecological approaches in new rural development programmes. Now is your last chance to use this CAP reform for the future of rural economies, for the environment and for EU citizens' health and well-being. To reach this goal and ensure your legacy as a defiant reformer of a greener and fairer CAP we call on you to steer Member States and regions to implement the following:

#### ***Public money for public goods means no synthetic pesticides and fertilisers on ecological focus areas***

The EU is heavily dependent on imported plant protein crops such as soya. Therefore, the possibility to cultivate nitrogen-fixing protein crops on ecological focus areas (EFAs) has been introduced. However, if the application of pesticides and fertiliser would be allowed on these areas, it would contradict the idea of "greening" of direct payments. Greening should lift the environmental performance and the long-term viability of all EU's food production. Agrochemical use impacts heavily on biodiversity and is therefore clearly not compatible with this objective. Therefore:

- the use of agrochemicals must be prohibited on EFAs through an EU-wide ban
- the weighting factor for EFAs must not be increased in favour of nitrogen-fixing crops

Whilst the introduction of nitrogen-fixing crops can lead to improved environmental and economic benefits<sup>2</sup>, pesticide use not only negatively impacts on biodiversity and the potential of biological controls and results in greater environmental and economic costs, but in combination with nitrogen

<sup>1</sup> De Schutter, O. Final report: The transformative potential of the right to food. Report of the Special Rapporteur on the right to food. Available at: [http://www.srfood.org/images/stories/pdf/officialreports/20140310\\_finalreport\\_en.pdf](http://www.srfood.org/images/stories/pdf/officialreports/20140310_finalreport_en.pdf); Freibauer, A. et al., (2011). Sustainable food consumption and production in a resource-constrained world. The 3<sup>rd</sup> SCAR Foresight Exercise. European Commission – Standing Committee on Agricultural Research (SCAR).

<sup>2</sup> Bues, A., et al. (2013). The environmental role of protein crops in the new Common Agricultural Policy. Brussels: European Parliament

fixing-crops, it can lead to increased dependency on synthetic fertilisers.<sup>3</sup> As a result under the criteria proposed by the Commission the effectiveness of ecological focus areas to improve the resilience of targeted farm holdings is now seriously called into question. EFAs are crucial for reinforcing ecosystem services in particular functional biodiversity (pollinators, pest predators, etc.) which is necessary for maintaining productive and sustainable farming systems capable of ensuring sufficient and equitable long-term food security, and decreasing our dependency costly inputs. **Now that the Commission has decided to reopen the delegated acts in response to pressure from the European Parliament's Agriculture Committee you must put in place strict criteria which clearly ban the use of synthetic fertilisers and pesticides on EFAs.**

***Public money for public goods means supporting the transition towards agro-ecological approaches in new Rural Development Programmes***

Environmental measures under Pillar 2 rural development programmes need to build on what is left of the Pillar 1 greening. Therefore:

- a strong commitment to invest in advanced sustainability measures must be a central part of new rural development programme e.g. agri-environment-climate schemes, organic farming, animal welfare and LEADER
- Member States authorities must be able to demonstrate no roll back on the positive RDP environmental and socio-economic outcomes resulting from past reforms

Failing to ambitiously support these and other advanced sustainability measures in new Rural Development Programmes will seriously undermine our ability to meet EU 2020 targets and transition Europe towards a green, low carbon economy. Worse still, lack of investment in these measures, for example in favour of low-level agri-environmental measures, looks certain to reverse many of the positive outcomes of Rural Development resulting from past reforms and would be a missed opportunity to stimulate inclusive green job creation.<sup>4</sup> **In your final negotiations on new Rural Development Programmes with Member States authorities you must ensure that genuine investments are made that enhance the overall sustainability of agriculture and rural communities and respond to wider societal demands for safe, sufficient and healthy food.**

As a key decision-maker in the implementation process we call on you to act on behalf of the public interest and use your power to ensure that this CAP reform finally begins to boost green and fairer outcomes for European agriculture and rural areas that can support a transition to a real agro-ecological agenda.

Yours sincerely,

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<sup>3</sup> Pimentel, D., (2009). Environmental and Economic Costs of the Application of Pesticides Primarily in the United. In: P., Rajinder, and A K. Dhawan. Integrated Pest Management: Innovation-development process; Geiger, F. et al., (2010). Persistent negative effects of pesticides on biodiversity and biological control potential on European farmland. *Basis and Applied Ecology* 11 (2), 97–105; Fox, J.E., et al., (2007). Pesticides Reduce Symbiotic Efficiency of Nitrogen-Fixing Rhizobia and Host Plants. *Proceedings of the National Academy of Sciences of the United States of America*. 104 (2), 10282-7;

<sup>4</sup> GHK., 2011. Evaluating the Potential for Green Jobs in the next Multi-annual Financial Framework:

[http://awsassets.panda.org/downloads/green\\_jobs\\_full\\_report.pdf](http://awsassets.panda.org/downloads/green_jobs_full_report.pdf)



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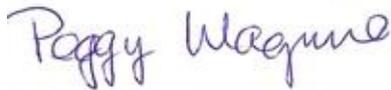
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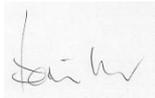
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