

**EISA's Contribution  
to the European Commission's  
Public Consultation  
on the CAP "Health Check"**



**General remarks**

The European Initiative for Sustainable Development in Agriculture representing Integrated Farmers through their national associations in several EU Member States welcomes the "Health Check" as a policy instrument to verify whether the CAP is working in conformity with the guidelines set out in the 2003 reform.

We would, however, appreciate if already at that point of time a discussion on a change of approach could be initiated. Farming in the 21st century needs a (political) Framework taking into account the following sustainability aspects: holistic, science-based, market-oriented (consumer driven), economically viable, ecologically and socially-oriented.

One of the major challenges for agriculture world-wide and thus also in the EU is to achieve a markedly higher resource efficiency in terms of soil, water, nutrients and energy and, hence, higher output per unit of input. The questions in the public consultation on the CAP "Health Check" take account of several of these challenges.

What we are missing, however, is the switch from an issue-by-issue based political approach to a holistic, whole farm management approach such as Integrated Farming (for details see EISA's Integrated Farming Framework on [www.sustainable-agriculture.org](http://www.sustainable-agriculture.org)). Recent legislative developments, e.g. on the Framework Directives on the Sustainable Use of Pesticides and Soil Protection, proved that such a change is urgently needed.

We believe that the CAP "Health Check" offers the best opportunity to enter into a dialogue on such a change of understanding and the subsequent political and legislative approach.

**Specific Comments / Answers to Questions**

**Simplifying the Single Payment Scheme (SPS):**

The path towards decoupling and market-orientation should be followed further. However, a considerable reduction of bureaucracy is needed and highly desirable; new environmental regulations should not go along with new bureaucratic burdens for farmers.

**Cross-Compliance:**

We are of the opinion that cross-compliance and GAEC should be restricted to issues tackling land management in a wider sense, i.e. soil, water, air (climate change), the use of fertilisers and plant protection products, animal welfare and food traceability. However, climate change as such cannot be adequately addressed via cross compliance.

### Partially coupled support:

EISA supports payments for specific types of farming which are important for the protection or the enhancement of the environment and which are socially responsible, e.g. contributing to rural development. In our point of view, Integrated Farming is the farming system which meets these requirements best.

However, if funds are taken away from direct support measures in order to spend them in rural areas (shift from pillar 1 to pillar 2), they should be used for agricultural measures in these rural areas and not just for any other business or activity.

### Upper and lower limits in support levels:

We are sure that farmers representing different farm sizes have different views on these issues. However, a capping of support for larger structures (e.g. through a progressive reduction of unit support) will in general discriminate larger, efficient farms and thus reduce the motivation for efficient farming and the overall farming efficiency. Such a proposal lacks a clear objective, complicates the SPS instead of simplifying it and might lead to unnecessary restructuring of businesses, causing additional bureaucracy.

This cannot be in the interest of EU agriculture.

### Market intervention and supply controls:

Market intervention reduces farmers' motivation to produce market-oriented and should thus be abolished within an adequate timeframe (depending on sector/products concerned). However, when striving for a market-driven agriculture it is counterproductive to burden farmers with additional environmental and other competition-distorting standards at the same time. A further or even complete abolition of intervention should hence go in hand with an economic analysis of the gap between environmental, social and other competition-distorting standards for farmers in the EU and other major agricultural regions of the world. Conclusions to close the gap should be drawn.

### Set-aside:

EISA supports the abolition of compulsory set-aside. However, in this context it should be taken into account that a good deal of set-aside land was used for nature conservation purposes in the past. Hence, again a holistic approach to farming is needed, being efficient in production areas and allowing for nature conservation in a network of structural elements and in particular in nature conservation areas. The correct place for any such environmental corrective for the abolition of set-aside should be voluntary measures in paid-for agri-environment schemes in Pillar 2.

### Climate change, bio-energy, water management and biodiversity:

World-wide climate change problems cannot be solved by the EU farming community. Agriculture in Europe can only offer a limited contribution, and the way forward is definitely depending on an efficient use of resources. The totality of all the demands being placed on farmers and farmland (food, feedstuff, agro-fuels, fibres and building material, landscape and biodiversity, etc.) needs to be recognised and a balanced approach has to be found. Again Integrated Farming offers parts of the overall solutions to the climate change problem, water management, biodiversity, etc.

### Strengthening rural development (see also "Partially coupled support):


The EU farming community surely agrees that rural development is one of the major challenges for the society in the near future, and thus sufficient funds need to be deployed to make rural areas more attractive.

However, great caution is needed when shifting funds within the EU agricultural budget.

## Summary

EISA believes that it is high time for the EU institutions to start reflecting on a change of approach towards the Common Agricultural Policy, taking account of the future of agriculture in the European Union, which will be determined by market orientation and less public funds for farmers.

Integrated Farming offers a holistic, science-based, economically viable, ecologically and socially-oriented approach, and EISA is ready to contribute to such a change of mind set.

A handwritten signature in black ink, appearing to read 'Robby Schreiber', with a long horizontal line extending to the right across the end of the signature.

Robby Schreiber  
Head of Brussels Office

Brussels, 15 January 2008