

President Juncker
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Brussels, 22nd March 2016

Subject: CAP Fitness Check - Can the CAP deliver a sustainable European food and farming system?

Dear President Juncker,

CC: First Vice-President Timmermans, Vice-President Georgieva, Commissioner Hogan,

The undersigned organisations active in farming, development, environment, climate, animal welfare, food systems and public health, appeal to you to consider a review of the European food and farming system. We believe that this system is largely broken and that the main policy currently addressing it – the Common Agricultural Policy (CAP) – requires an urgent assessment, as it seems not equipped to address the fundamental challenges that Europe is facing in this sector.

Some of the most important indicators of the state of the food and farming system in Europe include an **unfair system for farmers, a constant crisis on agricultural markets, a continuous decline in the state of natural resources, failures in delivering in animal welfare, negative public health outcomes, and severe negative impacts beyond Europe's borders** (please refer to Annex 1 for the facts and figures). The CAP has not only failed to prevent these problems but in many cases has exacerbated them.

In the context of the European Commission's Regulatory Fitness and Performance (REFIT) programme, the Commission has in recent years carried out Fitness Checks for numerous policies, including several areas of EU environmental legislation such as those concerning freshwater, waste, birds and habitats. By contrast, the CAP, which accounts for almost 40% of the EU Budget, has not yet been identified for such an evaluation. We believe that this represents a missed opportunity, especially in light of the issues raised above and outlined in Annex 1, which clearly suggest this policy's inability to address key societal concerns.

In light of the Commission's Better Regulation agenda, rising levels of Euroscepticism which are challenging the EU and its ability to reform itself, and the fact that an increasing number of governments are facing severe budget constraints, the time has come to fundamentally question the CAP and verify whether it is good value for money and whether it fulfils its objectives. This challenge cannot be addressed by a limited exercise, such as the previous round of reform, nor with the foreseen marginal changes to its 'greening' component. The undersigned organisations consider that a Fitness Check process will ensure that fundamental questions will be asked about the structure of the policy and some of its basic principles, which have been left untouched for

decades. Civil society has already addressed your Commission pointing out the need to undergo a REFIT of the CAP a number of times¹.

In order to decide whether or not it makes sense to maintain the CAP in its current form, and whether the allocation of substantial budgetary resources towards it is justified, we believe it is essential to answer all five Fitness Check questions (further details in Annex 2):

- Is the CAP **effective in achieving its objectives**?
- Is the CAP **efficient in achieving its objectives**?
- Is the CAP **coherent** with other agreed EU political objectives and policies?
- Is the CAP still a **relevant** policy?
- What **EU added-value** does the CAP provide to EU citizens?

We strongly believe that only a serious Fitness Check of the CAP will ensure that such a policy delivers real benefits to EU citizens, farmers, our environment, our animals, our health and climate. It is time to have an unbiased **debate about the reform of the CAP, the EU budget, and other policies that have an effect on our food and farming system.**

We hope you will listen to our call and take the necessary steps to bring forward this fundamental debate.

We thank you in advance for your response.

Yours sincerely,



Floris Faber, CEO, ACT Alliance EU



Christian Schrefel, Chairman, Arche Noah



Francisco Panella, President, Bee Life European Beekeeping Coordination



Ariel Brunner, Senior Head of Policy, BirdLife Europe



Philip Lymbery, Chief Executive, Compassion in World Farming



Jeremy Wates, Secretary General, European Environmental Bureau

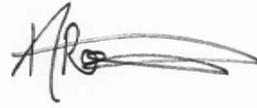
¹ Read the EEB's official [request](#) to the European Commission for a CAP Fitness Check.

Read the EEB document: '[Juncker Commission Priorities Revisited](#)'.

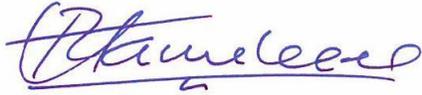
Some of our organisations also sent a letter to Vice-President Frans Timmermans on this issue, on 8 March.



Carol Ritchie, Executive Director - EUROPARC



Nina Renshaw, Secretary General, European Public Health Alliance



Reineke Hameleers, Director, Eurogroup for Animals



Jorgo Riss, Director, Greenpeace



Paolo Di Croce, Secretary General, Slow Food



Pierre Sultana, Director, VIER PFOTEN



Geneviève Pons, Director, WWF European Policy Office

On behalf of the undersigned organisations:

"Europe and We" Bulgaria

ACT Alliance EU

An Taisce

Arche Noah

Austrian Caving Association (Verband österreichischer Höhlenforscher)

Austrian Green Farmers Association

Bee Life European Beekeeping Coordination

BirdLife Europe

Bread for the World

Bulgaria in Europe

Bulgarian society for the protection of birds

BUND (Friends of the Earth Germany)

CEEweb for Biodiversity

Clean Air Action Group

Coastwatch

Compassion in World Farming

Danish Ecological Council

DNR (Deutscher Naturschutzring, German League for Nature and Environment)

Estonian Society for Nature Conservation

Eurogroup for Animals

EuroNatur

EUROPARC

European Central Council of Homeopaths

European Environmental Bureau

European Public Health Alliance

EU-Umweltbüro

Fédération Inter-Environnement Wallonie

Federation of environmental organizations of Cyprus

France Nature Environnement

FRAPNA, Federation Rhone-Alpes de Protection de la Nature

Friends of the Earth Europe

Fundatia ADEPT Transilvania

Green Action Association (Zöld Akció Egyesület)

GREEN BALKANS - Federation of Nature Conservation NGO's

Greenpeace

Health Equalities Group

IOGT-NTO

L'Associazione Medici per l'Ambiente - ISDE Italia

Latvian Fund for Nature

LPN - Liga para a Protecção da Natureza

Natagora

Naturefriends International

Naturschutzbund Deutschland e.V. (NABU)

Natuurpunt

PAN Italy

QUERCUS, National Association for Nature Conservation (PORTUGAL)

Scottish Health Action on Alcohol Problems

Slow Food

Smoke Free Partnership

SOL – People for solidarity, ecology and lifestyle, Austria

Suomen Luonnonsuojeluliitto – The Finnish Association for Nature Conservation

Swedish Society for Nature Conservation

Vereniging Natuurmonumenten

Vereniging Nederlands Cultuurlandschap

Vier Pforten

Welthaus Diözese Graz-Seckau

WWF

Annex 1: The State of Europe's Food and Farming System

- **An unfair system for farmers:** EU farms are disappearing at an alarming rate; between 2003 and 2013 just over 4 million holdings (one out of every four farms) disappeared in the EU, while the total area used for agriculture remained almost stable. This means increasing agricultural concentration, with a 38% increase in the average area of EU farms, from 11.7 hectares in 2003 to 16.1 hectares in 2013². Labour forces at farm level dropped by 30%³ - while around 70% of the CAP direct payments are still going to only 20% of the farmers⁴.

- **A constant crisis in agricultural markets:** Globally, farmers have seen their share of the market price shrink. Most of the money spent by consumers goes to intermediaries, traders, and retailers rather than farmers themselves⁵. Almost on a monthly basis, farmers protest throughout Europe because they can no longer keep their head above water. In the face of such a dire situation the only policy responses seem to be temporary crisis management measures, which cost a significant amount of money to taxpayers and do not appear to provide structural solutions for the future.

- **Continuous decline in the state of natural resources:** The agricultural sector is also the primary source of diffuse pollution which significantly affects 90% of river basin districts, 50% of surface water bodies, and 33% of groundwater bodies throughout the EU⁶. In many countries, farmers with close dependence on the environment, such as beekeepers, suffer on average over 30% losses to their livestock⁷. By 2050 greenhouse gas emissions from agriculture will represent over 30% of total EU emissions⁸.

Biodiversity on farmland keeps decreasing⁹, and even Member States themselves acknowledged that agriculture remains the main sector preventing the EU from reaching its target under the Birds and Habitats Directives¹⁰. Furthermore, agrobiodiversity (both with regards to the genetic diversity of cultivars and farmed animals) is plunging¹¹, raising questions as to the future resilience of farming systems and breeding efforts faced with the wide array of agro-ecological but also socio-economic challenges to come.

- **Failures in delivering on animal welfare:** Animal agriculture is responsible for the majority of agricultural activities, through direct animal farming or feed production. While EU citizens demand strong support for high animal welfare standards¹², such a topic is not adequately addressed in the CAP. During the previous CAP period only 0.1% of the CAP budget was spent on animal welfare. Over the years, the policy actually eased the

² [\[online\]](#)

³ [\[online\]](#) and [\[online\]](#)

⁴ Based upon the study done for the European Parliament that can be downloaded [here](#).

⁵ [\[online\]](#)

⁶ Report: The Water Framework Directive and the Floods Directive: Actions towards the 'good status' of EU water and to reduce flood risks [\[online\]](#)

⁷ [Epilobee project](#)

⁸ [\[online\]](#)

⁹ 57% of farmland birds have declined between 1980s and 2013 [\[online\]](#), while worrying negative trends in wild pollinators are observed [\[online\]](#) and beekeepers have long been notifying enhanced bee winter losses and disorders - Van der Zee R, Pisa L, Andonov S, Brodschneider R, Charriere J-D, et al. (2012) Managed honey bee colony losses in Canada, China, Europe, Israel and Turkey, for the winters of 2008–9 and 2009–10. *J Apic Res Bee World* 51: 100– 114.

¹⁰ The State of Nature in the European Union [\[online\]](#)

¹¹ More than 90 percent of crop varieties are considered to have disappeared from farmers' fields worldwide, while half of the breeds of many domestic animals have been lost (Food and Agriculture Organisation of the United Nations, "What is Agrobiodiversity », in *Building on Gender, Agrobiodiversity and Local Knowledge*, 2004, [\[online\]](#); also in *The State of the World's Plant Genetic Resources for Food and Agriculture*, 1996.

¹² The [2015 Eurobarometer](#) on Animal Welfare shows very strong support from EU citizens [\[online\]](#)

transition to an industrialised model of animal farming, negatively affecting the welfare of animals and driving overproduction, as well as overconsumption, of animal products¹³.

- **Negative public health outcomes:** Unhealthy diet is the EU's single largest public health risk and a primary driver of obesity¹⁴. Together with smoking and alcohol consumption it is also the main cause of chronic diseases, responsible for 86% of Europe's burden of mortality¹⁵. Furthermore, environmental degradation, antibiotic resistance and climate change endanger the significant gains in human health achieved during the last century^{16 17}. A recent LIFE+ project called LiveWell for LIFE¹⁸ has shown that with just a few simple tweaks to our daily eating choices, those choices would improve our health, remain affordable and reduce the impact of our eating habits on the climate by a reduction of 25% in greenhouse gas emissions. In addition, air pollution, caused to a significant extent by farming practices, is alone responsible for over 400,000 early deaths in the EU every year¹⁹.

- **Severe negative impacts beyond Europe's borders:** The EU is the world's biggest importer and exporter of food and agricultural products²⁰. Europe's meat and dairy products are to a large degree dependent on protein feed imports²¹ which cause serious problems in their areas of production, leading to forced evictions and displacement of small farmers and indigenous people, loss of employment, loss of biodiversity and increased food insecurity^{22 23}.

The EU is internationally more competitive now than in the past. In 2015, the EU had a 15 billion euro trade surplus. Since 2009, the value of EU agro-food sector exports has increased rapidly, hindering the structural development of the agri-food sector in Sub-Saharan Africa, whose exports have significantly declined²⁴. The absence of reference to the CAP's impact on third countries neglects the EU's international responsibilities which are in line with the EU's Policy Coherence for Development commitments²⁵, designed to ensure the EU's trade policies do not harm nor frustrate the development of agri-food sectors in third countries.

¹³ Westhoek H, Rood T, van den Berg M, Janse J, Nijdam, D, Reudink M, Stehfest E (2011). The Protein Puzzle: The Consumption and Production of Meat, Dairy, and Fish in the European Union. The Hague: Netherlands Environmental Assessment Agency [\[online\]](#) Chatham House (2014) 'Livestock- Climate Change's Forgotten Sector: Global Public Opinion on Meat and Dairy Consumption' [\[online\]](#)

¹⁴ The Global Burden of Disease (2013) European Union and European Free Trade Association Regional Edition [\[online\]](#)

¹⁵ WHO Europe (2012) Action plan for implementation of the European strategy for the Prevention and Control of Non-communicable Diseases 2012-2016 [\[online\]](#) and for discussion on the links between CAP and public health, see report: European Public Health Alliance (2016) A CAP for Healthy Living [\[online\]](#).

¹⁶ Nick Watts et al. (2015) Health and climate change: policy responses to protect public health. The Lancet. [\[online\]](#)

¹⁷ WHO (2014) Antimicrobial Resistance Global Report on Surveillance. [\[online\]](#)

¹⁸ LiveWell for LIFE was a project executed by WWF and Friends of Europe between 2011-2014, and was co-financed through the European Commission's environment fund LIFE+.

¹⁹ This is for 2012 and a figure only linked to PM2.5, the total amount of early deaths due to air pollution will be higher. [\[Online\]](#).

²⁰ See point 2 World Trade in Agri-Food: The ranking of the top EU world agri-food exporters did not change in 2014, after the EU 28 took over the leading position from the US in 2013. EU exports reached Euro 122 billion, with an annual increase of 1.6%. The US is second just behind the EU, and then Brazil on third position. [\[online\]](#)

²¹ The dependency of the EU on protein-rich animal feed (around 70 %) mainly based on soya based bean meal. [\[online\]](#)

²² A study on 'virtual land grabbing' of the EU food economy reveals that Europe virtual net import of land amounted to almost 35 million ha in 2007/2008 which is an increase of almost 40 % compared to the year 2000. Large scale soy cultivation employs only 1-2 persons per 400 hectares as compared to 80 people for food crop production on family farms. [\[online\]](#)

²³ [\[online\]](#)

²⁴ EC, 'Factsheets on EU28 agro-food trade with the world, various regions and individual countries', [\[online\]](#).

²⁵ Article 3 (5), Article 21 (3) and Article 208 on the Treaty of the Functioning of the EU

Annex 2 – Our proposal for the five CAP Fitness Check questions in detail:

- Is the CAP **effective** in delivering on its objectives of viable food production, sustainable management of natural resources, climate action, and balanced territorial development?
- Is the CAP **efficient**? Are the outcomes and deliverables of the policy proportionate to the amount of money spent on it? What are their costs and benefits?
- Is the CAP **coherent** with other agreed EU political objectives and policies, such as the ‘health in all policies’ obligation in the European Treaties, climate mitigation and adaptation, and legislation on environment, water, air, soil, biodiversity, animal welfare as well as consumer protection? Is it coherent with international and global commitments?
- Is the CAP still a **relevant** policy? How relevant is the CAP to EU citizens and what is their understanding and level of support for it?
- What **EU added-value** does the CAP provide to EU citizens? Does it add value that could not be done at Member State level?