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European Parliament
Rue Wiertz
Brussels

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Phil Hogan
Member of the European Commission
Agriculture and Rural Development
European Commission
Rue de la Loi 200
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Dear Commissioner Hogan,

In response to your request to Mr Siekierski, Chair of the Agriculture and Rural Development Committee, I write to you as substitute member of the Committee in order to address my concerns regarding the direction the Commission is taking in seeking to simplify the CAP. Simplification of the CAP should not be a euphemism for abandoning cross-compliance and greening measures. Nor should it distract from genuine attempts to reform the faulty guiding principles of the CAP.

Within the CAP, there is ample opportunity to improve the agricultural sector's resource efficiency and environment performance. Simplification should not target the greening measures themselves - on the contrary, these efforts to integrate environmental considerations into agriculture were largely watered down, and subject to many exemptions. Rather, simplification should imply an improved efficiency in the methods by which competent authorities monitor these vital requirements. Environmental considerations should not and need not imply additional burdens on farmers. Further, the Commission needs to improve its communication, not only on the actual content of requirements, but also on their very purpose - the benefits which they will bring in ensuring sustainable agriculture.

Strong cross-compliance and greening ought to ensure high environmental and animal and public health standards throughout EU agriculture. Ensuring their effective implementation is therefore a valuable use of taxpayers' money - recognising here that farmers too are taxpayers, consumers and beneficiaries of a healthy environment. Alongside existing cross-compliance requirements such as those for Natura 2000, there is still scope for the further legislation to be integrated, such as the Water Framework Directive, Sustainable Use of Pesticides Directive and animal welfare legislation. Such standards are often nothing new to farmers, but they nevertheless require a greater integration and coherence.

The intended benefits of these standards must be better communicated to farmers. Training and knowledge transfer is a means to this end - yet transfers away from Pillar 2 funding have compromised these measures. An excessive concern over error rates distracts from the fact that compliance is only meaningful for sustainable agriculture and society when its standards are robust. There needs to be better monitoring and analysis of whether and, if so, how

greening measures are bringing the environmental benefits they were intended to. This would clarify the link between the farm practices encouraged through cross compliance and greening, their control, and their desired outcomes.

The demands on farmers' time could in many cases be greatly relieved through improved interoperability of databases and better use of data, reducing the number/duration of on-site checks. However, many competent authorities lack funding or the will of their political masters to make such improvements possible.

The greening of the CAP has been weakened by loopholes, not to mention exemptions covering a high percentage of the EU's agricultural area. This detracts from the very logic of greening - that sustainable agriculture is vital for all farmers. Instead of crop rotation - already a widespread cross-compliance requirement before the reform -, mere 'diversification' was agreed. Rather contradictorily, Maintenance of Permanent Pasture allows for offsetting of biodiverse areas. Likewise, Ecological Focus Areas (EFA) allow for the use of pesticides and fertilisers, and can be shifted each year, which further complicates their declaration and control. EFA in particular could be much more easily controlled through well-functioning LPIS-GIS whereby farmers and authorities can access updated orthophotographs, building on controls of the pre-existing 'landscape elements.' Finally, a lack of communication is criticised, leading to inconsistencies and uncertainty in application of the measures, both on the part of competent authorities and farmers themselves.

Finally, the two-pillar system is inhibiting a change in mindset regarding the CAP. Firstly, payments are not by right; they ought to be accorded in exchange for public goods. Secondly, the lack of a ceiling for basic payments and limited degressivity means that the CAP is still biased in favour of industrial-scale agriculture, rather than smaller-scale farmers and the biodiversity they can bring. Schemes such as the Small Farmers Scheme remain optional. With this in mind, the CAP should move towards a system wherein all payments are based on the environmental benefits which agriculture can ensure.

I thank you for your consideration of these issues, and I look forward to the first exchange of views during the next Committee meeting.

Yours sincerely,



Molly Scott Cato
MEP for South West England and Gibraltar

