



Brussels, June 2018

FACE POSITION ON THE COMMON AGRICULTURAL POLICY POST 2020

I. Context:

European hunters are aware that the Common Agricultural Policy (CAP) is a crucial support mechanism for agriculture and rural areas in Europe. However, the current CAP has a significant negative impact on the environment, biodiversity and the status of many huntable and non-huntable species in agricultural landscapes. Most small game populations have dramatically decreased due to intense agricultural practices (dramatic loss of quality habitat and food, with poor insect abundance) and the utilisation of unsustainable agricultural production methods. The impact is similar in many protected areas.

On 1 June 2018, the European Commission (EC) published its proposals for regulations on modernising and simplifying the CAP. In FACE's opinion¹, many of the proposals need greater clarity to ensure a high level of ambition with regard to environment and biodiversity. The position of FACE is clear in that the next CAP must:

- Require Member States to set strong environmental **objectives** whereby their performance can be objectively and systematically assessed.
- Promote the **partnership principle** with the involvement of the national environmental authorities and consultation with relevant stakeholders and scientific communities.
- Ensure a **high level of ambition** with regard to environment and biodiversity. Therefore, enough resources from the EC are needed for the assessment of national CAP Strategic Plans.

II. Performance-based EU objectives:

The future CAP will focus on nine general objectives of which three will concern the environment and climate – covering the issues of climate change, natural resources, biodiversity, habitats and landscapes. These objectives must be applied in coherent manner in line with existing global policies aiming to implement and enforce EU legislation. This will ensure that the next CAP contributes to implementing, for example, the:

- **Birds and Habitats Directives:** Reaching/maintaining a favourable status of all habitats and species of European importance.
- **EU Biodiversity Strategy to 2020:** Reaching better conservation or secure status for 100% more habitats and 50% more species.

The same needs to apply for other directives including the Water Framework Directive, the Nitrates Directive, the Sustainable Use of Pesticides Directive etc. and to ensure the EU's compliance with international agreements such as AEWA (Agreement on the Conservation of African-Eurasian Migratory Waterbirds) and CMS (Convention on the Conservation of Migratory Species of Wild Animals) and the 2030 Sustainable Development Goals.

¹ See also FACE's submission to the European Commission's Consultation on modernising and simplifying the Common Agricultural Policy (CAP): <http://www.face.eu/about-us/resources/news/faces-contribution-to-a-new-european-agricultural-policy>



The new proposed system of “conditionality” should link all farmers’ income support to the application of these performance-based EU objectives. Making support conditional on enhanced standards must be accompanied with clear rules on improving biodiversity in the next CAP. In this context, Member States should be required to establish ambitious measures within their national CAP Strategic Plans. As far as the proposed objective; “*Contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes*” is concerned, FACE is asking for inclusion of the term “**restoration and management**” to be added after “protection”.

III. National CAP Strategic Plans:

In their CAP Strategic Plans, Member States will be required to establish the national/regional priorities to follow under each EU objective according to national/regional needs. To define the priorities, Member States and relevant authorities should first undertake a “needs assessment”, involving all relevant stakeholders (including farmers, hunters, land managers and other environmental organisations) and with the close inspection of the EC. The national objectives should be SMART (specific, measurable, achievable, relevant and time-specified). Each Member State should identify relevant **indicators** out of a list of standard indicators defined at EU level to measure the progress made in the accomplishment of the objectives.

- **Type of relevant indicators:** Farmland Bird Population Indicator, Common Monitoring and Evaluation Framework (CMEF) Impact Indicator, Sustainable Development Goals indicators.
- **Data sources:** Article 12 of the Birds Directive and Article 17 of the Habitats Directive, Eurostat, European Environment Agency, European Bird Census Council, NGOs.

Each year, Member States should submit a performance report to the EC to show the progress they have made, based on these specific result indicators. Robust **monitoring and reporting** systems will be required to measure and report on the progress and performance made under each objective. Such reporting programmes should be designed to demonstrate whether the national CAP Strategic Plans have the expected impact. Robust and credible biodiversity data at national level should be made available to the EC to evaluate the progress made. National monitoring and reporting systems should be systematic, harmonised, credible and independent. FACE and its national member associations are committed to provide existing data coming from long-term and robust monitoring programs of wild game populations and are willing to engage in new monitoring programmes to ensure a more performance-based CAP. New technology for controls and monitoring such as developments in ortho-mapping systems and satellite data should be used in conjunction with field monitoring data. With regard to land eligibility rules (i.e. the red-lining of ineligible features), FACE welcomes the provision of greater flexibility at national level to ensure that non-productive (but agriculturally and environmentally valuable) habitats are re-established on Europe’s farmland.

IV. Assessment of National CAP Strategic Plans by the EC:

National CAP Strategic plans should be evaluated based on, for example, their impact on the status of wildlife populations by relevant DGs of the EC and not only by DG Agri. Therefore, enough resources from the EC are needed for the assessment of the CAP Strategic Plans on both quantitative and qualitative levels. The National CAP Strategic Plans should show:

- The way they will clearly contribute to meeting the EU objectives;
- The contribution they will make to helping achieve e.g. good conservation status of habitats, as required by the nature (and other) directives;



- The targets set (at the level of result indicators);
- The types of intervention and the financial allocations chosen.

The EC should reject a national CAP Strategic Plan if it is considered to be unambitious, mismatching with the EU's objectives, presenting inadequate indicators, disrespectful towards the partnership principle, or failing to address biodiversity loss. The EC should assess the progress made on achieving the national objectives through annual monitoring and reporting. The impact indicators should support the EC in evaluating the strategic plans in the long-term.

V. Towards a system of direct payments that delivers for biodiversity:

CAP direct payments must be conditional on compliance with environmental requirements. Furthermore, CAP payments need to be fairer to farmers because currently in Europe, 80% of the money used for direct payments goes to 20% of the farmers ([European Commission, 2017](#)). The new proposed system of “conditionality” (making payments based on biodiversity standards mandatory) should be designed to support the transition to more sustainable and habitat-friendly farming systems that deliver biodiversity and ecosystem services. Such “conditionality” payments should be coupled at national level with alternative payment systems that reward farmers for delivering food and public goods - better rewards should be delivered to a higher level of efforts.

This should include those extensive farming systems, including High Nature Value (HNV) farming, farming within Natura 2000 sites or in areas with other habitats/species of community interest (such as conservation of permanent pastures, maintenance and creation of landscape features, organic farming, individual and collective schemes addressing biodiversity) and highly ambitious objectives should receive greater support. FACE acknowledges that although organic farming can produce multiple benefits including the promotion of landscape diversity, extensive organic farming delivers more for biodiversity and thus should be promoted at national level. To be sure Member States have necessary financial support, money for such biodiversity schemes **must be ring-fenced** within Pillar I and Pillar II. There should be limited flexibility for Member States to move money out of Pillar II into Pillar I. As climate and environment are public goods, they should be an objective for all and FACE insists on the fact that the budget defined for public purpose should be used effectively and not be reduced.

VI. Mandatory and voluntary measures at farm level:

The next Greening element of the CAP will be replaced² by a new system of “eco-schemes” to meet their biodiversity objectives. These voluntary measures must be financially attractive to farmers to be implemented at farm level and should be common to all Member States to fulfil the biodiversity objectives in order to address the loss of wildlife populations. Some key points include:

- Defining a minimum portion of each agricultural land holding to be devoted to non-productive features or areas where the use of chemical inputs, tillage or cropping would be restricted unless it is strictly needed for the achievement of biodiversity goals. Cooperation between stakeholders should also be promoted to reach the desired ecological and socio-economic objectives.

² See also FACE's position on Greening under the next CAP: <http://www.face.eu/about-us/resources/news/face-position-on-greening-under-the-next-cap>



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- The maintenance of permanent grasslands should remain a high priority. A specific percentage of grassland as well as farmland should be maintained as priority biodiversity areas. Mowing should not take place more than twice per year. The first mowing can take place after July 1st (to be differentiated between regions). Subsidies could depend on the species-richness of grasslands. It should also be possible to create biodiversity strips of old grass (without using them).
- Promoting multi-annual flower seed mixes to be planted during autumn of the previous year and need to be kept until at least 15 of August of the subsequent year.
- Abolition of the requirement of soil mulching on a yearly basis.
- Defining a maximum size of monoculture for all Member States.
- Establishing, with accredited farm advisors, a performance-based farm-plan to suit each farm, which could be financially supported under Pillar II.