

Consultation on the Common Agricultural Policy (CAP)

Comments from the Federation of Associations for Hunting and Conservation of the EU (FACE)

I. Introduction:

European hunters are aware that the CAP is a crucial support mechanism for agriculture and rural areas in Europe. However, hunters and national hunting associations are also aware of the significant impact of agriculture driven by the CAP on the environment, biodiversity and the status of many huntable species in Europe. Hunters are particularly concerned about the populations of many small game species, which are declining dramatically.

II. Function of the next CAP:

It is the opinion of FACE that the next CAP should:

- Reward farmers for producing food and ecosystem services whatever the scale, thereby providing multiple benefits for farmers and society at large. For hunters, this means that the next CAP should play a more positive role with regard to the conservation of small game species, which require a diversity of farmland habitats.
- Encourage and help farmers to better respond to the multiple environmental and often competing market demands.
- Incentivise habitat restoration while, at the same time, provide economic security to farm families.
- Contribute better to the EU's international commitments on biodiversity conservation and to the relevant Sustainable Development Goals.
- Provide flexibility for Member States to adapt their land eligibility requirements to local and regional land use conditions and characteristics (i.e. to support the diversity of Europe's countryside).

III. Structure of the next CAP

If a Pillar system remains in place in the next CAP, there must be greater coherence between direct payments and rural development support aimed at conserving biodiversity. Thus far, direct (Pillar I) and rural development (Pillar II) supports have not been demonstrated to be effective enough in delivering the necessary environmental benefits. It is therefore essential that greater incentives are linked to Pillar I payments in order to provide environmental public goods. In terms of direct support to farmers, it is the opinion of FACE that the next CAP should:

- Focus on incentivising farmers to deliver environmental public goods through a rewards-based framework. This will require close cooperation at Member State level between agricultural and environmental authorities.
- Help farmers to make the transition to more sustainable farming practices.
- Guarantee that future "Greening" measures are better targeted with a simple system that incorporates different values of payment depending on the actions and how they benefit biodiversity.
- Contain a system of Ecological Focus Areas (EFAs), which provides suitable areas of non-productive habitat to promote biodiversity conservation. The focus should be on ensuring that local vegetation and habitat types can be found throughout the rural landscape with corresponding chemical provisions and restrictions.

- Provide greater flexibility to Member States so that they are better able to adapt their land eligibility requirements to specific local and regional conditions in line with established local practices.
- Ensure greater support for HNV (High Nature Value) farming by making it mandatory for Member States to incentivise sustainable agriculture (and to prevent land abandonment) in these areas. In this context, support for High Nature Value and Natura 2000 farming must be ensured.

IV. Rural Development:

The CAP must be designed in a manner that delivers financial support for Rural Development with a strong focus on:

- The sustainability of rural communities, through the existing systems of grants and financing, such as the LEADER Programme.
- The involvement of environmental authorities in programme design and monitoring.
- Locally-led design and implementation of the schemes on the ground and participatory approaches should be required.
- Promoting result-based agri-environmental schemes and locally-designed agri-environmental schemes targeting clear ecological outcomes.

V. Simplification

Regarding simplification, there have been concerns and evidence to suggest that Greening has been designed and implemented in an unsatisfactory manner, thereby leading to low quality results, with many farmers frustrated about the administration and bureaucracy associated with the measures. The next CAP should be simpler for users with a reduction in the amount of bureaucracy that currently inhibits creativity and innovation with regard to biodiversity conservation. Member States should be required to produce user-friendly guidance to farmers.

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