



THE VOICE OF EUROPEAN HUNTERS

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Mr. Frans Timmermans

Executive Vice-President

for the European Green Deal

Rue de la Loi 200

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Brussels 13 November 2020

Subject: Ongoing inter-institutional negotiations on the CAP post 2020

Dear Vice-President Timmermans,

The European Federation for Hunting and Conservation (FACE), representing 7 million hunters in Europe, has followed the CAP post 2020 since its inception in 2018. Hunters have long witnessed the dramatic decline of huntable and non-huntable wildlife populations, pollinators, and plant diversity in agricultural areas due to biodiversity loss. As recognised by the European Court of Auditors (ECA) in several of its reports, agricultural intensification is undoubtedly one of the main leading causes of biodiversity loss.

There was much hope amongst hunting communities scattered across Europe that the CAP post 2020 could finally represent the reform nature had long needed. Unfortunately, the European Parliament and the Council have failed to deliver a new farm policy in line with the Farm to Fork and the Biodiversity Strategies. **The EU Green Deal will not be credible if the next CAP does not deliver for biodiversity.**

When discussing the compatibility of the CAP post 2020 with the Green Deal last May, the European Commission (EC) clearly underlined that the key provisions of the CAP proposals must be maintained in the negotiating process, and certain improvements and practical initiatives should be developed. This statement has been largely disregarded by the European Parliament and the Council. Instead of increasing the level of ambition set in the European Commission's original proposal, it seems that the two co-legislators have preferred to adopt a position which largely preserves the status quo.

A first analysis of the EP and Council positions shows that key habitats for biodiversity such as wetlands and permanent grassland will receive less protection compared to the EC's original proposal. GAEC no.9, which was originally defined as the percentage of the agricultural area devoted to non-productive features, has been weakened and transformed into a percentage calculated on arable land only. Therefore, the percentage is no longer applicable to livestock farming, as proposed by the EC. This means that many farms will be exempted as applying this only to arable land reduces the applicable area by 38%.

Regarding the precise percentage to be included under this controversial GAEC, the EU Biodiversity Strategy for 2030 underlined the need for at least 10% of land devoted to non-productive features to reverse biodiversity loss. Nevertheless, the EP and Council introduced a less ambitious percentage of 5%. Such a percentage is further reduced to 3% in the Council's position, if Member States decide to include only non-productive features (hedgerows, buffer strips, etc.) and not catch crops and nitrogen fixing crops. Indeed, catch and nitrogen fixing crops are mentioned under GAEC no.9 as possible options – despite having no real benefits for biodiversity. It remains to be seen if eco-schemes can deliver for biodiversity, as they are compulsory for Member States but not for farmers.

The definition of permanent grassland is also less ambitious than expected. Member States will have discretion in deciding if shrubs and trees are included in the definition of permanent grassland. The inclusion of these elements in the definition would have provided clarity to farmers and avoided unnecessary clearing of important ecological features across EU's farmland. On a more positive note, FACE welcomes the definition of agricultural area provided by the European Parliament, which unequivocally includes non-productive features.

In light of the above considerations, we ask the European Commission to ensure that during the ongoing inter-institutional negotiations the CAP post 2020 maintains a high level of ambition in line with the Green Deal and its key pillars, namely the Farm to Fork and Biodiversity Strategies.

We remain at your disposal should you require any further information.

Your sincerely,



Dr. David Scallan

Secretary General

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