

PUBLIC DEBATE ON THE FUTURE OF THE CAP – ENRD – BirdLife’s response

BirdLife International is a global Partnership of conservation organisations that strives to conserve birds, their habitats and global biodiversity, working with people towards sustainability in the use of natural resources. This is BirdLife’s contribution to the ENRD aspect of the CAP public debate.

A. What should be the objectives of the future rural development policy?

Farming and wider land management are key activities for stemming the collapse of biodiversity, mitigating and adapting to climate change, and maintaining plentiful and clean water resources. Safeguarding Europe’s resource base and ensuring the health of our ecosystems is also crucial for our long-term food security and for the viability of rural communities. While many elements of the current Rural Development Policy are already playing a crucial role in rewarding farmers for the provision of public goods and in supporting adaptive improvement to farming and rural activities, the magnitude of the challenges will require profound changes to the ways in which Europe’s land resource is used and managed. The current CAP is widely failing to deliver effective and efficient action. Whilst these challenges will require action long into the future, they are not ‘future challenges’, they exist now and require swift and coordinated action to ensure Europe’s farming policies are sensibly designed and properly equipped.

With the aim of ensuring greater coherence and integration of Community policies, the CAP, including Rural Development Policy, should contribute to other EU strategies (e.g. EU Strategy on Sustainable Development) and policy objectives such as halting the loss of biodiversity. It should also contribute to EU international commitments such as those under the Convention on Biological Diversity and the UN Climate Convention. Such a transformation would bring the CAP in line with the Budget Heading - “Preservation and management of natural resources” - under which it falls. We believe that the following objectives can legitimately and effectively be pursued through the CAP, including through the type of instruments currently found within the Rural Development Policy:

- To create the environmental conditions to sustain long-term agricultural production through the protection of ecosystems and their services (soil, air and water) and the sustainable use of natural resources;
- To accelerate the transition toward resource-efficient farming that is less dependent on fossil inputs and more resilient in the face of climate change and other external pressures;
- To promote conditions for the production of safe, healthy and high quality food;
- To maintain and enhance (wild) farmland biodiversity by halting and reversing declines;
- To maintain (domesticated) agricultural biodiversity;
- To contribute to achieving ‘good status’ in European freshwater systems and adjacent coastal waters;
- To contribute to climate change adaptation and mitigation;
- To support the maintenance of landscapes & a rural heritage rich in aesthetic, cultural or historical value;
- To contribute to the rural vitality of areas highly dependent on agriculture and where this is important to support the viability of those farming systems which underpin the delivery of public goods;
- To promote enhanced animal welfare;
- To support sustainable food systems which better connect producers and consumers.

A key objective of the CAP should be to accelerate the transition towards more sustainable farming systems that can combine high productivity with reduced environmental impacts and careful resource use. There is also an important role for Farm Advisory Services to promote sustainable practices that cannot be adequately secured through regulation or public payments (due to difficulties in enforcement or inspection).

While supporting the transition of the more productive farming systems, special attention should be given to the maintenance of HNV farming systems, the often traditional extensive systems on which much of Europe’s biodiversity depends. While these systems often have lower levels of productivity and economic profitability, they deliver high levels of public goods that need to be recognized and rewarded. As Organic farming systems offer a model of enhanced sustainability in farming and generally deliver more of the environmental benefits mentioned above, as well as incorporating enhanced animal health and welfare standards, they also warrant specific system support.

Rural Development policy has considerable potential to pursue the policy objectives identified above as it contains many valuable operational principles, namely: well-defined objectives; strategic approach to programming; partnership principle; approval by the European Commission; Common Monitoring and Evaluation Framework; contractual basis; co-financing.

By basing the entire future CAP on current Rural Development principles and incorporating other crucial good governance elements (such as improved targeting, accountability, coherence and transparency), EU

agriculture could become a powerful tool for the achievement of key EU objectives and deliver value for taxpayers' money.

B. How can the policy instruments be made more effective?

All CAP payments should clearly aim at the achievement of specific and well-defined policy objectives. It must be clear what any payment is trying to achieve and results should be quantifiable and measurable against robust baselines. Support must not be directed to generic commitments or to commitments that cannot deliver the desired results. Member States will need to ensure that each scheme is targeting the most relevant land and farmers. National targeting could be based on a combination of criteria such as location, farming type, presence of particular environmental problems or assets.

BirdLife believes that a range of CAP schemes are required to ensure public money is properly targeted to the delivery of environmental public goods from farming and land management. You can find these schemes in more detail in our vision document:

http://www.birdlife.org/eu/pdfs/Proposal_for_a_new_common_agricultural_policy_FINAL_100302.pdf

The development of measurable targets for biodiversity is far behind where it should be. Member States need to prioritise the design and monitoring of meaningful impact indicators and assessment of schemes' effectiveness. The results of monitoring should feed back into the design of schemes and into funding allocation. This requires a robust monitoring and evaluation framework which includes:

- An obligation to dedicate adequate funding for the collection of field data in relation to environmental variables;
- Robust indicators of scheme impacts and targeted research into the effectiveness of all schemes, to ensure their successful delivery;
- Independent monitoring and assessment bodies to carry out the planning and delivery of schemes;
- An obligation to publish monitoring data and incorporate findings into improvements and periodic reviews

See also: http://www.birdlife.org/eu/pdfs/Could_do_better_report_05_09.pdf

C. How can the management of the policy be improved?

EC Regulation 1698/2005 sets out the strategic approach to be taken to the design and implementation of the Rural Development policy, through EU strategic guidelines and national strategy plans. Such an approach requires that the initial strategic analysis of the situation be used to set targets and, consequently, to design the appropriate mix of tools and allocate the necessary budget. Our impression however, is that in most Member States the national strategy has not served as a basis for the drafting of the RDPs. Instead, existing schemes have often simply been rolled forward, sometimes with amendment or the addition of new elements under competing external pressures. In most cases, the two processes have been carried out in parallel, with the strategy more often adapted to the draft programme, than vice versa.

BirdLife has the following recommendations:

- National strategies must be subject to Commission approval and this should precede the elaboration of the plans.
- RDPs should clearly demonstrate how measures correspond to stated strategic objectives and additional rules should be included in the programming process to ensure coherence along the whole chain from the overarching EU objectives to individual schemes.
- More explicit and detailed rules are needed to ensure that programming, monitoring, assessment and scheme improvement are undertaken in real consultation and co-operation with all relevant stakeholders, including environmental NGOs.
- Effectiveness of all spending should be regularly and meaningfully monitored using success indicators based on measurement of impacts; the level of uptake of voluntary schemes should no longer be considered a success indicator.
- Mechanisms need to be established to require and enable schemes to be regularly reviewed and improved in the light of results.
- Rules should be established to ensure coherence and synergy across axes and measures, as well as full accountability of spending. Mechanisms should be defined to build win-win-win packages of measures for environment, business and quality of life. Provisions should be introduced to ensure that sufficient environmental capacity is included in LAGs.
- Compliance with relevant legislation (cross compliance) should be a prerequisite for access to any RD funding streams (and not just to environmental measures as is currently the case).