

Mr George Lyon MEP  
9 Newton Terrace,  
Glasgow  
G3 7PJ

Friday 23<sup>rd</sup> April

Dear Mr Lyon,

**Re: draft report on the future of the CAP after 2013**

We are writing on behalf of the Agriculture Groups of Wildlife and Countryside Link, Scottish Environment Link, Northern Ireland Environment Link and Wales Environment Link (Joint Links)<sup>1</sup> following the recent publication of your draft report on the *Future of the Common Agricultural Policy after 2013*. We welcome the report's positive language on the need for a greener and more sustainable CAP and believe this will constructively engage much of the farming lobby in this important policy issue. However, we feel that the report does not provide enough meaningful substance to support its headline aspirations and would like to reiterate the concerns we raised in our previous letter (19 March) and at the meeting we had with you in February. We would also like to provide some ideas on how we think the report can be improved in advance of the Committee vote in June.

We were disappointed that many of the points we raised in response to your working document have not been taken into account, particularly regarding an environmentally focused evolution of the CAP to become a European Sustainable Land Management Policy.

Currently, we feel that the draft report does little more than attempt to justify the status quo, and it shows insufficient appreciation of the environmental responsibilities of the agricultural sector. In particular, we believe the report should give greater emphasis to how agriculture can manage our soil and water resources more sustainably, give greater protection to our biodiversity and continue to maintain and enhance the character of our landscapes and historic environment features, as well as ensuring the highest standards of animal welfare. The report needs to identify solutions to the environmental challenges we face and we are not convinced by its justification for the continuation of direct payments.

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<sup>1</sup> Please see Annex 1



We have outlined below the areas which are of most concern in the draft report.

- Despite the Joint Link's understanding that this report would call for more funding for Pillar II, we were disappointed to read only a vague reference to this in the draft report (point 59). We believe that it would be very difficult to incentivise agri-environment schemes and encourage farmers to deliver the additional environmental benefits (point 27) without extra funding, particularly if the modulation mechanism is abolished<sup>2</sup>. The level of funding to *reward farmers for the delivery of additional ecosystem services* will need to be substantial and a strong case should be made for retaining the financial resources that will be needed to meet existing and future environmental challenges.
- Although the report references the EU 2020 strategy for jobs and growth, it gives insufficient recognition to the environmental responsibilities of agriculture. There is an urgent need to reverse continuing trends of biodiversity loss and ecosystem degradation. The European Council is committed to the long term 2050 vision and the ambitious 2020 target to halt and restore the loss of biodiversity<sup>3</sup> but these are not mentioned in the draft report.
- The Joint Links welcome the report's focus on sustainability, although we feel it could be discussed in broader terms. Improving carbon efficiency could be a useful measure, but it should not supersede the urgent need to reduce overall emissions. Sustainable climate change adaptation and mitigation measures should be embedded throughout the CAP and a new approach to agriculture is required which combines enhanced productivity with improved resilience of the natural environment. Sustainability is also about much more than greenhouse gas emissions. Comprehensive measures are required to protect and enhance our soils, water and biodiversity, all of which have suffered from the effects of resource intensive farming in the past 40 years, despite underpinning the sector's long term ability to produce food and other ecosystem services.
- The Joint Links recognise the vital importance of food security and the CAP's contributions to achieving this, but we do not believe that direct payments can be justified on food security grounds. Pressure to reduce EU spending and growing public awareness of untargeted and inefficient direct payments has highlighted that value for money must be central to the policy after 2013. Research indicates that direct payments have a negligible impact on food production and if they were to be phased out entirely, EU food production would still increase<sup>4</sup>. By reforming the CAP to reward the delivery of public goods, it would be possible to demonstrate both a sound use of public money

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<sup>2</sup> The UK's Land Use Policy Group estimate the total cost of meeting publicly defined environmental objectives in the UK at just under £2 billion per year, significantly more than currently spent on agri-environment schemes.

<sup>3</sup> European Council communication p9

[http://www.consilium.europa.eu/uedocs/cms\\_data/docs/pressdata/en/ec/113591.pdf](http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/113591.pdf) and Environment Committees conclusions <http://www.countdown2010.net/2010/wp-content/uploads/Council-Conclusions-new-biodiversity-target.pdf>


<sup>4</sup> ECNC, LEI and ZALF (2009) Final report for the 'Update of Analysis of Prospects in the Scenar 2020 Study' *Preparing for Change*. Contract No. 30-CE-0200286/00-21

as well as targeting financial support to farmers and land managers who deliver the most for the environment and yet are marginalised by the current payment framework. Such a transformation would also help European farming address the challenges of climate change and move towards a more sustainable system of farming which is critical to ensuring the sector's long term ability to produce a range of ecosystem services, not least food. We believe a key role for the CAP should be to help secure long-term EU food security through protecting the natural resource base upon which food production depends, including sustainable use of our soils and water and protecting our biodiversity.

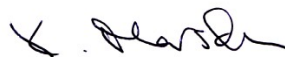
- The purposes of a reformed CAP should take into account all the public goods that need to be provided by agriculture, including maintaining and enhancing our cultural landscapes and historic environment features, as well as addressing existing environmental challenges such as biodiversity loss and climate change adaptation and mitigation<sup>5</sup>. These wider environmental issues are not mentioned in the draft report.

Once again thank you for listening to our concerns when we met. We would very much like to meet you again to discuss our views in further details if that would be possible. However, if we can be of any assistance in the meantime, or if you would like any further information, please do not hesitate to contact our colleague Kirsten Knap at Wildlife and Countryside Link on +44 207 820 8600 or [kirsten@wcl.org.uk](mailto:kirsten@wcl.org.uk).

Yours sincerely,



Gareth Morgan  
Chair  
Agriculture Working Group  
Wildlife and Countryside Link



Katrina Marsden  
Chair  
Agriculture Task Force  
Scottish Environment Link



Sue Christie  
Director  
Northern Ireland Environment Link



Susan Evans  
Director  
Wales Environment Link

On behalf of the following organisations:

**Wildlife and Countryside Link**

- Association of Rivers Trusts
- Amphibian and Reptile Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation

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<sup>5</sup> UK National Ecosystem Assessment <http://uknea.unep-wcmc.org/Home/tabid/38/Default.aspx>

- Campaign to Protect Rural England
- Council of British Archaeology
- The Grasslands Trust
- Plantlife International
- Royal Society for the Protection of Birds
- Wildfowl & Wetlands Trust
- The Wildlife Trusts
- Woodland Trust

**Scottish Environment Link**

- Archaeology Scotland
- Buglife – The Invertebrate Conservation Trust
- Bumblebee Conservation Trust
- Butterfly Conservation Scotland
- National Trust for Scotland
- Plantlife Scotland
- RSPB Scotland
- Scottish Wildlife Trust
- Woodland Trust Scotland

**Wales Environment Link**

- Bat Conservation Trust
- Butterfly Conservation
- Coed Cadw (Woodland Trust)
- RSPB Cymru

Cc:

Alyn Smith MEP  
 Robert Sturdy MEP  
 Jill Evans MEP  
 Diane Dodds MEP  
 Jim Nicholson MEP  
 Richard Ashworth MEP  
 Brian Simpson MEP  
 Bairbre de Brún MEP  
 Linda McAvan MEP  
 Glenis Willmott MEP  
 Julie Girling MEP  
 Chris Davies MEP  
 Martin Callanan MEP  
 Marina Yannakoudakis MEP  
 James Elles MEP  
 Derek Vaughan MEP

## **Annex 1 – Information regarding the Joint Links**

**Wildlife and Countryside Link (WCL)** brings together over 30 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 690,000 hectares of land.

**Scottish Environment LINK (SEL)** is the forum for Scotland's voluntary environment organisations - 33 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK assists communication between member bodies, government and its agencies and other sectors within civic society. Acting at local, national and international levels, LINK aims to ensure that the environment is fully recognised in the development of policy and legislation affecting Scotland.

**Northern Ireland Environment Link (NIEL)** is the forum and networking body for organisations interested in the environment of Northern Ireland. NIEL was formally launched in 1990 to complete the network of four 'Country Links' in the UK: Scottish Environment Link, Wales Environment Link and Wildlife and Countryside Link.

**Wales Environment Link (WEL)** is a network of environmental and countryside Non-Governmental Organisations in Wales, most of whom have an all-Wales remit. WEL is officially designated the intermediary body between the government and the environmental NGO sector in Wales. Its vision is to increase the effectiveness of the environmental sector in its ability to protect and improve the environment through facilitating and articulating the voice of the sector.