

Mr Chris Davies MEP
87A Castle Street
Edgeley
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SK3 9AR

19 March 2010

Dear Mr Davies

Re: Environment Committee response to George Lyon's draft report on the CAP

We are writing on behalf of the Agriculture Groups of both Wildlife and Countryside Link¹ and Scottish Environment Link², (whose members have the support of over 8 million people in the UK), regarding the forthcoming reforms of the CAP and George Lyon's report to the European Parliament Committee on Agriculture and Rural Development.

At a recent meeting that we held with George Lyon MEP, we requested that his draft report be shared and discussed with the Chair of the European Environment Committee as well as the wider Committee members. We understand that the Environment Committee has taken the decision not to view the report. As a UK member of the Committee, we would urge you to reconsider this decision and to comment on the draft report, the subject of which could have far reaching consequences on the Environment Committee's policy areas.

We understand that these include biodiversity, freshwater, soil and landscape character all of which are closely dependent on agri-environment schemes, the funding of which takes place under Pillar II. Unless the CAP is more closely aligned with the

¹ 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.

² 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.



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"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Paul de Zylva, Director: Jodie Bettis

Vice Presidents: Peter Ainsworth MP, David Kidney MP and
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delivery of environmental public goods, it is likely that we will see further declines of biodiversity and further detrimental effects on the wider environment.

We have highlighted the points below, at our meeting with George Lyon, and we recently reiterated these points following the publication of his working document. We feel it is vital that these points are taken into account to ensure that our environment continues to be protected and food production remains sustainable in the long term.

- The need for a reformed CAP to be equipped with the means to deliver a very wide range of environmental public goods, both now and in the future.
- The level of funding to achieve the above will need to be substantial and the report should make a strong case for retaining the financial resources that will be needed to meet existing and future environmental challenges.
- The purposes of a reformed CAP should take into account all the public goods that need to be provided, including preserving cultural landscapes and historic environment features, as well as existing environmental challenges such as preventing biodiversity loss and climate change adaptation/mitigation.

We acknowledge that building support throughout the EU for an environmentally focused evolution of the CAP into a European Sustainable Land Management Policy is undoubtedly a challenge. However, the priorities and proposals contained in the working document appear to be little more than an argument for maintaining the status quo. We are very disappointed that the document does not currently have a timetable for the CAP to evolve into the public goods delivery mechanism that it needs to become in the next decade.

Although we are pleased to see that the report calls for a '*fairer, greener and more sustainable CAP*', there appears to be an imbalance between both the number and the detail of farming support measures compared to environmental measures.

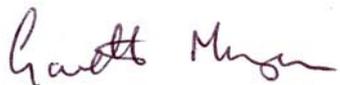
We are also aware that the draft report on simplification of the CAP (2009/2155(INI)) proposes a reduction in cross compliance requirements thus making the contribution of the CAP to sustainability objectives even more tenuous. Proposals of this kind will be unhelpful in justifying maintaining existing funding levels to the CAP based on its public goods delivery role given the already weak environmental conditions that are applied to its payments.

The argument that it is necessary to maintain the CAP because its income support role will address future food security issues is becoming less convincing in the current economic and political climate and even more so now the apparent supply crisis for some agricultural commodities that occurred two years ago has abated.

Consequently, we would like to see proposals for environmental measures in the draft report strengthened to make the CAP greener and to ensure a strong case is made for increasing the levels of funding for Pillar II of the CAP to ensure its public goods delivery potential is enhanced.

Please find enclosed a copy of WCL's policy perspective, *Beyond the Pillars* on the future of the CAP. If you require any more information, or would like to arrange a meeting please contact our colleague, Kirsten Knap at Wildlife and Countryside Link on 0207 820 8600 or kirsten@wcl.org.uk. We look forward to hearing from you.

Yours sincerely



Gareth Morgan
Chair
Agriculture Working Group
Wildlife and Countryside Link



Katrina Marsden
Chair
Agriculture Task Force
Scottish Environment Link

On behalf of the following organisations;

Wildlife and Countryside Link

- Amphibian and Reptile Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- The Council for 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