

Department for the Environment, Food and Rural Affairs

CAP Reform post 2013

Response Form

December 2011

Please use this form to answer the questions contained within the 'CAP Reform post 2013' discussion paper.

The closing date for the submission of responses is midnight 5th March 2012.

Responses can be returned by email (preferable) or post.

Email address: cap.reform@defra.gsi.gov.uk (clearly mark the subject field "Cap Reform post 2013")

Or by post to:

EU Agriculture and Budget Strategy Team
Department for Environment, Food and Rural Affairs
EU Budget and Agricultural Strategy Programme
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9 Millbank
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17 Smith Square
London
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In order to help us analyse responses, please provide details of your organisation below.

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Organisation / Company	Society of Biology
Organisation Size (no. of employees)	19 employees We are the leading professional body representing many of the learned societies and other organisations making up the diverse landscape of the biological sciences, as well as thousands of individuals. Members include practising scientists, students at all levels, professionals in academia, industry and education, and non-professionals with an interest in biology. With an effective membership of over 80,000, we are uniquely placed to represent the wider bioscience community and serve the public interest.
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Organisation Type	Please mark/give details as appropriate	
NGO	<input checked="" type="checkbox"/>	
Public Sector (eg, local / central government, hospitals, universities) (please give details)	<input type="checkbox"/>	
Retail Sector (eg, supermarkets) (please give details)	<input type="checkbox"/>	
Service Sector (eg, cinemas, hotel chains, banks) (please give details)	<input type="checkbox"/>	

Light Industry / Manufacturing	<input type="checkbox"/>	
Property Management	<input type="checkbox"/>	
Trader / Verifier	<input type="checkbox"/>	
Research Institute	<input type="checkbox"/>	
Other (please give details)	<input type="checkbox"/>	

N.B. on the form below, please leave the response box blank for any questions that you do not wish to answer. All boxes may be expanded as required.

1. What are your views regarding the direct payments proposals?

General recommendations

1. In return for taxpayers money, we expect farmers to deliver wholesome food, thriving rural societies, beautiful landscapes and a healthy environment while maintaining their land in a productive state for future generations. These challenging expectations require a Common Agricultural Policy which achieves a balance between the economic, social and environmental benefits of agriculture.
2. There is no consensus about how to define sustainable or efficient agriculture. We support a definition which involves long term economic, social and environmental viability. It is difficult but not impossible to balance all three factors simultaneously at the farm level while delivering the production and food security that society requires. The challenge of CAP is to ensure that all farms are making good on their potential to contribute to all three factors, and to balance these factors at regional scale. There is nothing in the current policy to balance factors at a regional or landscape scale. The regional approach of the Water Framework Directive could be adopted to provide solutions that vary regionally.
3. Food production is clearly central to any agricultural policy. And the future of farming requires significant improvements in environmental sustainability. Only if farming is economically sustainable can we expect farmers to deliver the non-costed ecosystem services upon which our survival relies.
4. European agriculture policy should aim to achieve food security without bringing additional land of higher biodiversity value into agricultural production.
5. We support the concept of sustainable intensification which would allow competitive food production to coexist with green measures. However this concept is far from being a practical method which can be delivered via farms across Europe. Therefore we recommend that specific, significant investment should be introduced through the CAP into research on and dissemination of methods for sustainable intensification across the diverse farming systems and geographical variety of Europe.
6. We agree with the Convention on Biological Diversity that: "Incentives, including subsidies, harmful to biodiversity should be eliminated, phased out or reformed"¹. As currently drafted, the Commission proposals unintentionally incentivise farmers to plough permanent pasture and replace existing biodiversity features. These perverse incentives must be removed.
7. The CAP needs to enable investment and incentivise resource-use efficiency.
8. The CAP should be as simple as possible, but must incorporate flexible measures which respect regional variations in geography, climate, culture, agricultural systems , valuable ecosystems etc.
9. If pillar one includes effective greening measures, this will free up well-targeted agri-environment schemes and budgets to address specific regional and ecological priorities.

Greening measures

10. The proposal for a compulsory and substantial green requirement for farmers receiving pillar one direct payments sends a welcome signal of the fundamental importance of environmental sustainability to the long-term future of agriculture.
11. As currently drafted, however, the proposals are too loosely worded to ensure environmental benefits, and indeed have the potential to create significant environmental harm especially to high nature value grasslands.
12. Requirements should be more clearly targeted on measurable environmental outcomes.
13. We recommend targeting more of the greening budget towards agricultural land which is already managed in a manner which generates high biodiversity. The concept of high nature value farming is well developed within European policy, and member states are required to identify high nature value farmland. It is therefore very surprising that the commission's greening proposals do not mention high nature value farming. Specific support that ensures the economic viability of high nature value farming should be included in the current proposals.

¹ Draft Strategic Plan for Biodiversity 2011-2020, Convention on Biological Diversity: Target 3. www.cbd.int/nagoya/outcomes

Permanent pasture

14. A definition of permanent pasture/grassland is required which would differentiate between high nature value permanent grasslands, and low nature value but high agricultural value intensively managed and reseeded grasslands.
15. High nature value grasslands, including flower rich hay meadows, wet meadows, and semi-natural wooded pastures, support a high proportion of Europe's agricultural biodiversity and generate significant ecosystem services including carbon storage, flood protection and cultural landscapes. Apart from livestock production, many ecosystem services are higher in semi-natural than in agriculturally improved grasslands, and this can be linked partially with the higher plant richness. They are often marginally economic at best, and are under threat from abandonment or intensification. These environmentally and socially valuable grasslands require a clear definition and specific protection within the Common Agricultural Policy, which is lacking in the current proposals. Indeed, the current proposals offer a perverse incentive for farmers to plough up such grasslands before the reference date of 2014. And the current definition of permanent grassland still allows member states to include annually reseeded or intensively fertilised grass in the permanent grassland category. This makes the greening mechanism completely meaningless for biodiversity and climate.

Ecological focus areas

16. It seems perverse that the proposed scheme appears designed to pay more for the creation of new biodiversity features, agri-forestry schemes etc than for the protection of existing biodiverse farming practices and land-use types. This contradiction should be removed, and existing biodiversity features must be strongly protected. As currently drafted, the policy would encourage farmers to destroy existing features and create new ones. An ancient wooded pasture, hedgerow, pond or flower-rich hay meadow is more ecologically diverse and valuable than a new one.

Crop rotation

17. It is not clear that the current proposal requiring rotation of arable crops will automatically generate environmental benefits proportional to their disruptive effects on some types of farm in some agroclimatic zones. The benefits of this and the other proposed measures depend crucially on how they are implemented. Measures more clearly targeted on environmental outcomes are likely to be more effective and should be introduced in the revised proposals.

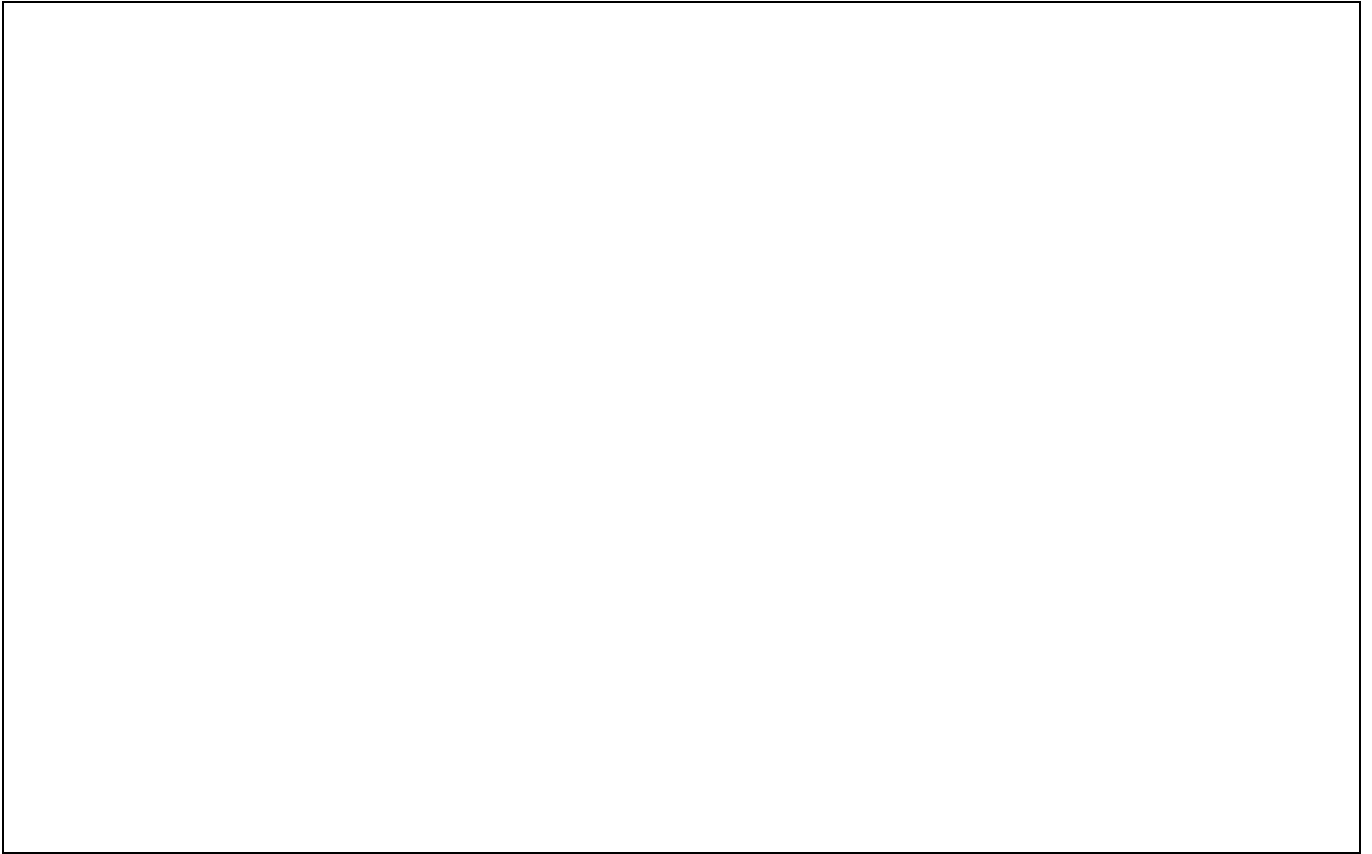
Small farmers scheme

18. We disagree in principle that farmers participating in the small farmers scheme should be exempted from cross compliance and the requirement to carry out agricultural practises beneficial for the climate and the environment. Small farms comprise a very significant proportion of agricultural land in some member states, and should also farm in a way that benefits the environment. But, unless the greening proposals are redrafted to deliver clearer environmental benefits, we do not think it necessary to burden small farmers with them.

Organic farming

19. We disagree that organic farmers should automatically receive greening payments, without having to demonstrate environmental benefits. Well managed organic farms do provide exceptionally good environmental benefits. However, badly managed ones can provide disbenefits such as nitrate pollution..

2. What are your views regarding the single common market organisation proposals?



3. What are your views regarding the rural development proposals?

Agri-environment schemes

- 20. While intensive farms should certainly be required to provide environmental benefits in return for support by the European taxpayer, the new CAP should include policy instruments which also protect the most environmentally valuable farmland from intensification or abandonment.
- 21. Specific support for high nature value farming should be included in the Commission proposals.
- 22. The Commission proposes to continue to pay farmers for environmental services on the basis of income foregone and additional costs. We believe that this formula, as currently applied by many member states, is inadequate to protect the most environmentally beneficial types of farming from abandonment or intensification. Alternative approaches such as paying the full costs of management for land which would otherwise be abandoned should be explicitly encouraged, and are allowed under current WTO rules.
- 23. Although there are examples of successful landscape-scale initiatives, current agri-environment schemes are piecemeal, because take-up is determined at farm scales, leading to weaker outcomes. The CAP should include landscape-wide initiatives.

4. What are your views regarding the financing, management and controls proposal?

5. What are your views regarding the proposals fixing certain aids and refunds?

6. What are your views regarding the transitional arrangements for direct payments in 2013?

7. What are your views regarding the proposals to support vine growers?

8. Do you have views on any further areas you think we should consider concerning this package of CAP reform proposals?

Research, knowledge and trained people

24. Research, knowledge and trained people are vital to define, develop and deliver sustainable agriculture and effective agricultural policy. They should receive a higher profile in the reformed CAP. The CAP must overcome major technical and scientific challenges if it is to reflect the multiple demands for food security and productivity, improved environmental quality and better social health, wealth and welfare.
25. There is inadequate investment in all forms of agricultural training and research, and a dearth of suitably qualified and skilled people, particularly in careers for the younger generation. Establishing, implementing and achieving agricultural policy will be entirely dependent upon skilled and trained people across all sectors from farm workers, agronomists, breeders and machinery producers to researchers and policy-makers.
26. A crucial role for public funding through CAP is research and training of individuals directed towards delivering and monitoring sustainable agriculture, and translating research into improved agricultural policy and practice.
27. There should be a greater emphasis on the transfer of information from research into the policy arena. The current regulatory framework is not wholly evidence-based.

Ecosystem approach

28. There should be no public subsidy unless it is linked clearly to the delivery of public goods.
29. Valuation of ecosystem services and natural capital is essential, so that their protection and management can be properly supported by the policy, and to assign an appropriate payment for goods and services provided by farmers which currently have no value in the market. The CAP should explicitly fund research to improve such valuations.

Genetic diversity

30. The policy should encourage greater integration of genetic biodiversity of farmed plants and animals into 'mainstream' biodiversity considerations.

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