

President Juncker  
European Commission  
Rue de la Loi / Wetstraat 200  
1049 Brussels  
Belgium

Brussels, 22<sup>nd</sup> March 2016

Subject: CAP Fitness Check - Can the CAP deliver a sustainable European food and farming system?

Dear President Juncker,

CC: First Vice-President Timmermans, Vice-President Georgieva, Commissioner Hogan,

The undersigned organisations active in farming, development, environment, climate, animal welfare, food systems and public health, appeal to you to consider a review of the European food and farming system. We believe that this system is largely broken and that the main policy currently addressing it – the Common Agricultural Policy (CAP) – requires an urgent assessment, as it seems not equipped to address the fundamental challenges that Europe is facing in this sector.

Some of the most important indicators of the state of the food and farming system in Europe include an **unfair system for farmers, a constant crisis on agricultural markets, a continuous decline in the state of natural resources, failures in delivering on animal welfare, negative public health outcomes, and severe negative impacts beyond Europe's borders** (please refer to Annex 1 for the facts and figures). The CAP has not only failed to prevent these problems but in many cases has exacerbated them.

In the context of the European Commission's Regulatory Fitness and Performance (REFIT) programme, the Commission has in recent years carried out Fitness Checks for numerous policies, including several areas of EU environmental legislation such as those concerning freshwater, waste, birds and habitats. By contrast, the CAP, which accounts for almost 40% of the EU Budget, has not yet been identified for such an evaluation. We believe that this represents a missed opportunity, especially in light of the issues raised above and outlined in Annex 1, which clearly suggest this policy's inability to address key societal concerns.

In light of the Commission's Better Regulation agenda, rising levels of Euroscepticism which are challenging the EU and its ability to reform itself, and the fact that an increasing number of governments are facing severe budget constraints, the time has come to fundamentally question the CAP and verify whether it is good value for money and whether it fulfils its objectives. This challenge cannot be addressed by a limited exercise, such as the previous round of reform, nor with the foreseen marginal changes to its 'greening' component. The undersigned organisations consider that a Fitness Check process will ensure that fundamental questions will be asked about the structure of the policy and some of its basic principles, which have been left untouched for

decades. Civil society has already addressed your Commission pointing out the need to undergo a REFIT of the CAP a number of times<sup>1</sup>.

In order to decide whether or not it makes sense to maintain the CAP in its current form, and whether the allocation of substantial budgetary resources towards it is justified, we believe it is essential to answer all five Fitness Check questions (further details in Annex 2):

- Is the CAP **effective in achieving its objectives**?
- Is the CAP **efficient in achieving its objectives**?
- Is the CAP **coherent** with other agreed EU political objectives and policies?
- Is the CAP still a **relevant** policy?
- What **EU added-value** does the CAP provide to EU citizens?

We strongly believe that only a serious Fitness Check of the CAP will ensure that such a policy delivers real benefits to EU citizens, farmers, our environment, our animals, our health and climate. It is time to have an unbiased **debate about the reform of the CAP, the EU budget, and other policies that have an effect on our food and farming system.**

We hope you will listen to our call and take the necessary steps to bring forward this fundamental debate.

We thank you in advance for your response.

Yours sincerely,



Floris Faber, CEO, ACT Alliance EU



Laura Sullivan, Europe Regional Director, ActionAid International



Francisco Panella, President, Bee Life European Beekeeping Coordination



Christian Schrefel, Chairman, Arche Noah



Philip Lymbery, Chief Executive, Compassion in World Farming



Ariel Brunner, Senior Head of Policy, BirdLife Europe

---

<sup>1</sup> Read the EEB's official [request](#) to the European Commission for a CAP Fitness Check.

Read the EEB document: '[Juncker Commission Priorities Revisited](#)'.

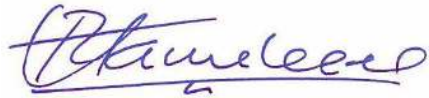
Some of our organisations also sent a letter to Vice-President Frans Timmermans on this issue, on 8 March.



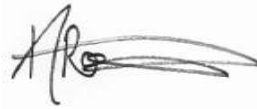
Carol Ritchie, Executive Director – EUROPARC



Jeremy Wates, Secretary General, European Environmental Bureau



Reineke Hameleers, Director, Eurogroup for Animals



Nina Renshaw, Secretary General, European Public Health Alliance



Paolo Di Croce, Secretary General, Slow Food



Jorgo Riss, Director, Greenpeace



Geneviève Pons, Director, WWF European Policy Office



Pierre Sultana, Director, VIER PFOTEN

**On behalf of the undersigned organisations (see all logos in Annex 3):**

ACT Alliance EU  
ActionAid  
AirClim  
An Taisce  
Arche Noah  
ARC2020  
Asociación de apicultores de la Comunidad de Madrid (Apiscam)  
Asociación RedMontañas  
Asociación Trashumancia y Naturaleza  
Association of Italian Chiropractors  
Associazione Italiana per l'Agricoltura Biologica  
Austrian Caving Association (Verband österreichischer Höhlenforscher)  
Austrian Green Farmers Association  
Bee Life European Beekeeping Coordination  
BirdLife Austria  
BirdLife Cyprus  
BirdLife Europe  
Bread for the World

Brinzal  
Bulgaria in Europe  
Bulgarian society for the protection of birds  
BUND (Friends of the Earth Germany)  
CEEweb for Biodiversity  
Centre for Sustainable Alternatives  
Centrul de Consultanta Ecologica Galati  
Clean Air Action Group  
Coastwatch  
Compassion World Farming  
Confederación en Defensa de la Abeja en la Cornisa Cantábrica CODACC  
Czech Society for Ornithology  
Danish Ecological Council  
Dansk Ornitologisk Forening  
Deutsche Umwelthilfe e.V. (Environmental Action Germany)  
Deutscher Naturschutzring (DNR)  
Ecologistas en Acción  
EFNCP  
Estonian Society for Nature Conservation  
Eurogroup for Animals  
EuroNatur  
EUROPARC  
Europe and We Bulgaria  
European Alcohol Policy Alliance (Eurocare)  
European Central Council of Homeopaths  
European Environmental Bureau  
European Federation of the Associations of Dietitians (EFAD)  
European Heart Network (EHN)  
European Institute of Women's Health  
European Public Health Alliance  
EU-Umweltbüro  
Federación de Asociaciones de Apicultores de Cantabria FACC  
Fédération Inter-Environnement Wallonie  
Federation of Environmental Organizations of Cyprus  
Federation SEPANSO Aquitaine  
FERN  
Foro Asturias Sostenible  
France Nature Environnement  
France Nature Environnement Provence-Alpes-Côtes d'Azur  
FRAPNA, Federation Rhone-Alpes de Protection de la Nature  
Friends of the Earth Europe  
Fundatia ADEPT Transilvania  
Green Action Association (Zöld Akció Egyesület)  
GREEN BALKANS - Federation of Nature Conservation NGO's  
Greenpeace  
Health Equalities Group  
Hellenic Ornithological Society  
Iniciativa Comunes  
IOGT-NTO  
Justice and Environment

L'Associazione Medici per l'Ambiente - ISDE Italia  
Latvian Fund for Nature  
Latvian Ornithological Society  
Legambiente Onlus  
Ligue pour la Protection des Oiseaux (LPO)  
Lipu - BirdLife Italy  
Lithuanian Ornithological Society  
LPN - Liga para a Protecção da Natureza  
MME/BirdLife Hungary  
Natagora  
natur&emwelt  
Naturefriends International  
Naturschutzbund Deutschland e.V. (NABU)  
Natuurpunt  
Naturefriends Greece  
New Water Culture Foundation (FNCA)  
ÖBV - Via Campesina Austria  
OTOP  
PAN Italy  
QUERCUS, National Association for Nature Conservation (PORTUGAL)  
Raptor Protection of Slovakia  
Rhodope mountains without borders  
Rural platform of Slovakia  
Scottish Health Action on Alcohol Problems  
SEO/BirdLife  
Sindicato Labrego Galego  
Slow Food  
Slow Food Youth Network  
Smoke Free Partnership  
Sociedade Portuguesa para o Estudo das Aves  
SOL – People for solidarity, ecology and lifestyle, Austria  
SOS/BirdLife Slovakia  
Spanish Council of Land Stewardship  
Suomen luonnonsuojeluliitto – The Finnish Association for Nature Conservation  
Sustainable Water Network (SWAN)  
Sustainable Food Trust  
Swedish Society for Nature Conservation  
The Danish Society for Nature Conservation / Danmarks Naturfredningsforening  
Unión Nacional de Asociaciones de Caza (UNAC)  
Vereniging Natuurmonumenten  
Vereniging Nederlands Cultuurlandschap  
Vier Pforten  
Vogelbescherming Nederland  
Welthaus Diözese Graz-Seckau  
WWF

## Annex 1: The State of Europe's Food and Farming System

- **An unfair system for farmers:** EU farms are disappearing at an alarming rate; between 2003 and 2013 just over 4 million holdings (one out of every four farms) disappeared in the EU, while the total area used for agriculture remained almost stable. This means increasing agricultural concentration, with a 38% increase in the average area of EU farms, from 11.7 hectares in 2003 to 16.1 hectares in 2013<sup>2</sup>. Labour forces at farm level dropped by 30%<sup>3</sup> - while around 70% of the CAP direct payments are still going to only 20% of the farmers<sup>4</sup>.

- **A constant crisis in agricultural markets:** Globally, farmers have seen their share of the market price shrink. Most of the money spent by consumers goes to intermediaries, traders, and retailers rather than farmers themselves<sup>5</sup>. Almost on a monthly basis, farmers protest throughout Europe because they can no longer keep their head above water. In the face of such a dire situation the only policy responses seem to be temporary crisis management measures, which cost a significant amount of money to taxpayers and do not appear to provide structural solutions for the future.

- **Continuous decline in the state of natural resources:** The agricultural sector is also the primary source of diffuse pollution which significantly affects 90% of river basin districts, 50% of surface water bodies, and 33% of groundwater bodies throughout the EU<sup>6</sup>. In many countries, farmers with close dependence on the environment, such as beekeepers, suffer on average over 30% losses to their livestock<sup>7</sup>. By 2050 greenhouse gas emissions from agriculture will represent over 30% of total EU emissions<sup>8</sup>.

Biodiversity on farmland keeps decreasing<sup>9</sup>, and even Member States themselves acknowledged that agriculture remains the main sector preventing the EU from reaching its target under the Birds and Habitats Directives<sup>10</sup>. Furthermore, agrobiodiversity (both with regards to the genetic diversity of cultivars and farmed animals) is plunging<sup>11</sup>, raising questions as to the future resilience of farming systems and breeding efforts faced with the wide array of agro-ecological but also socio-economic challenges to come.

- **Failures in delivering on animal welfare:** Animal agriculture is responsible for the majority of agricultural activities, through direct animal farming or feed production. While EU citizens express overwhelming support for higher animal welfare standards<sup>12</sup>, the CAP does not deliver on citizens' expectations. During the previous CAP period only 0.1% of the CAP budget was spent on animal welfare. Over the years, the policy actually eased

---

<sup>2</sup> [\[online\]](#)

<sup>3</sup> [\[online\]](#) and [\[online\]](#)

<sup>4</sup> Based upon the study done for the European Parliament that can be downloaded [here](#).

<sup>5</sup> [\[online\]](#)

<sup>6</sup> Report: The Water Framework Directive and the Floods Directive: Actions towards the 'good status' of EU water and to reduce flood risks [\[online\]](#)

<sup>7</sup> Epilobee project [\[online\]](#)

<sup>8</sup> [\[online\]](#)

<sup>9</sup> 57% of farmland birds have declined between 1980s and 2013 [\[online\]](#), while worrying negative trends in wild pollinators are observed [\[online\]](#) and beekeepers have long been notifying enhanced bee winter losses and disorders - Van der Zee R, Pisa L, Andonov S, Brodschneider R, Charriere J-D, et al. (2012) Managed honey bee colony losses in Canada, China, Europe, Israel and Turkey, for the winters of 2008–9 and 2009–10. *J Apic Res Bee World* 51: 100– 114.

<sup>10</sup> The State of Nature in the European Union [\[online\]](#)

<sup>11</sup> More than 90 percent of crop varieties are considered to have disappeared from farmers' fields worldwide, while half of the breeds of many domestic animals have been lost (Food and Agriculture Organisation of the United Nations, "What is Agrobiodiversity », in *Building on Gender, Agrobiodiversity and Local Knowledge*, 2004, [\[online\]](#); also in *The State of the World's Plant Genetic Resources for Food and Agriculture*, 1996.

<sup>12</sup> The [2015 Eurobarometer](#) on Animal Welfare shows very strong support from EU citizens [\[online\]](#)

the transition to an industrialised model of animal farming, negatively affecting the welfare of animals and driving overproduction, as well as overconsumption, of animal products<sup>13</sup>.

- **Negative public health outcomes:** Unhealthy diet is the EU's single largest public health risk and a primary driver of obesity<sup>14</sup>. Together with smoking and harmful alcohol consumption it is also the main cause of chronic diseases, responsible for 86% of Europe's burden of mortality<sup>15</sup>. Furthermore, environmental degradation, antibiotic resistance and climate change endanger the significant gains in human health achieved during the last century<sup>16 17</sup>. A recent LIFE+ project called LiveWell for LIFE<sup>18</sup> has shown that with just a few simple tweaks to our daily eating choices, those choices would improve our health, remain affordable and reduce the impact of our eating habits on the climate by a reduction of 25% in greenhouse gas emissions. In addition, air pollution, caused to a significant extent by farming practices, is alone responsible for over 400,000 early deaths in the EU every year<sup>19</sup>.

- **Severe negative impacts beyond Europe's borders:** The EU is the world's biggest importer and exporter of food and agricultural products<sup>20</sup>. Europe's meat and dairy products are to a large degree dependent on protein feed imports<sup>21</sup> which cause serious problems in their areas of production, leading to forced evictions and displacement of small farmers and indigenous people, loss of employment, loss of biodiversity and increased food insecurity<sup>22 23</sup>.

The EU is internationally more competitive now than in the past. In 2015, the EU had a 15 billion euro trade surplus. Since 2009, the value of EU agro-food sector exports has increased rapidly, hindering the structural development of the agri-food sector in Sub-Saharan Africa, whose exports have significantly declined<sup>24</sup>. The absence of reference to the CAP's impact on third countries neglects the EU's international responsibilities which are in line with the EU's Policy Coherence for Development commitments<sup>25</sup>, designed to ensure the EU's trade policies do not harm nor frustrate the development of agri-food sectors in third countries.

---

<sup>13</sup> Westhoek H, Rood T, van den Berg M, Janse J, Nijdam, D, Reudink M, Stehfest E (2011). The Protein Puzzle: The Consumption and Production of Meat, Dairy, and Fish in the European Union. The Hague: Netherlands Environmental Assessment Agency [\[online\]](#) Chatham House (2014) 'Livestock- Climate Change's Forgotten Sector: Global Public Opinion on Meat and Dairy Consumption' [\[online\]](#)

<sup>14</sup> The Global Burden of Disease (2013) European Union and European Free Trade Association Regional Edition [\[online\]](#)

<sup>15</sup> WHO Europe (2012) Action plan for implementation of the European strategy for the Prevention and Control of Non-communicable Diseases 2012-2016 [\[online\]](#) and for discussion on the links between CAP and public health, see report: European Public Health Alliance (2016) A CAP for Healthy Living [\[online\]](#).

<sup>16</sup> Nick Watts et al. (2015) Health and climate change: policy responses to protect public health. The Lancet. [\[online\]](#)

<sup>17</sup> WHO (2014) Antimicrobial Resistance Global Report on Surveillance. [\[online\]](#)

<sup>18</sup> LiveWell for LIFE was a project executed by WWF and Friends of Europe between 2011 and 2014, and was co-financed through the European Commission's environment fund LIFE+.

<sup>19</sup> This is for 2012 and a figure only linked to PM2.5, the total amount of early deaths due to air pollution will be higher. [\[Online\]](#).

<sup>20</sup> See point 2 World Trade in Agri-Food: The ranking of the top EU world agri-food exporters did not change in 2014, after the EU 28 took over the leading position from the US in 2013. EU exports reached Euro 122 billion, with an annual increase of 1.6%. The US is second just behind the EU, and then Brazil on third position. [\[online\]](#)

<sup>21</sup> The dependency of the EU on protein-rich animal feed (around 70 %) mainly based on soya based bean meal. [\[online\]](#)

<sup>22</sup> A study on 'virtual land grabbing' of the EU food economy reveals that Europe virtual net import of land amounted to almost 35 million ha in 2007/2008 which is an increase of almost 40 % compared to the year 2000. Large scale soy cultivation employs only 1-2 persons per 400 hectares as compared to 80 people for food crop production on family farms. [\[online\]](#)

<sup>23</sup> [\[online\]](#)

<sup>24</sup> EC, 'Factsheets on EU28 agro-food trade with the world, various regions and individual countries', [\[online\]](#).

<sup>25</sup> Article 3 (5), Article 21 (3) and Article 208 on the Treaty of the Functioning of the EU

## Annex 2 – Our proposal for the five CAP Fitness Check questions in detail:

- Is the CAP **effective** in delivering on its objectives of viable food production, sustainable management of natural resources, climate action, and balanced territorial development?
- Is the CAP **efficient**? Are the outcomes and deliverables of the policy proportionate to the amount of money spent on it? What are their costs and benefits?
- Is the CAP **coherent** with other agreed EU political objectives and policies, such as the ‘health in all policies’ obligation in the European Treaties, climate mitigation and adaptation, and legislation on environment, water, air, soil, biodiversity, animal welfare as well as consumer protection? Is it coherent with international and global commitments?
- Is the CAP still a **relevant** policy? How relevant is the CAP to EU citizens and what is their understanding and level of support for it?
- What **EU added-value** does the CAP provide to EU citizens? Does it add value that could not be done at Member State level?



Annex 3 – Logos of all the signing organisations



BirdLife Europe



European Environmental Bureau



Europarc



Eurogroup for Animals



Friends of the Earth Europe



WWF



ACT Alliance EU



Naturfriends International



Greenpeace



Arche Noah



Vier Pfoten



Compassion World Farming



European Public Health Alliance



Slow Food



Bee Life



CEEweb for Biodiversity



European Forum on Nature Conservation and Pastoralism



SWAN



The Danish Ecological Council



BUND



OTOP



Natuurpunt



Coastwatch



Austrian Green Farmers Association



Slow Food Youth Network



Bread for the World



PAN Italy



Justice and Environment



SOS/BirdLife Slovakia



Health Equalities Group



Natagora



Fundatia ADEPT Transilvania



Bulgarian society for the protection of birds



The Finnish Association for Nature Conservation



GREEN BALKANS - Federation of Nature Conservation NGO's



Hellenic Ornithological Society



Naturschutzbund Deutschland e.V.



Estonian Society for Nature Conservation



France Nature Environnement



Fédération Inter-Environnement Wallonie



Natuurmonumenten



Latvian Fund for Nature



An Taisce



Quercus



FEDERATION OF ENVIRONMENTAL ORGANIZATIONS OF CYPRUS



I'Associazione Medici ner l'Ambiente -



AGIR pour la BIODIVERSITÉ

Federation of Environmental Organizations of Cyprus



Bulgaria in Europe



Liga para a Protecção da Natureza

Ligue pour la Protection des Oiseaux (LPO)

Austrian Caving Association (Verband österreichischer Höhlenforscher)



Deutscher Naturschutzring (DNR)



BirdLife Cyprus



Swedish Society for Nature Conservation



European Central Council of Homeopaths



European Heart Network (EHN)



Danmarks Naturfredningsforening

The Danish Society for Nature Conservation



Deutsche Umwelthilfe

Deutsche Umwelthilfe e.V. (Environmental Action Germany)



IOGT-NTO



European Alcohol Policy Alliance (Eurocare)



Scottish Health Action on Alcohol Problems



Federation SEPANSO Aquitaine



Association of Italian Chiropractors



SOL – People for solidarity, ecology and lifestyle, Austria



"Europe and We" Bulgaria



Smoke Free Partnership



The Clean Air Action Group



France Nature Environnement  
Provence-Alpes-Côtes d'Azur



Welthaus Diözese Graz-Seckau



EuroNatur



EU-Umweltbüro



Federation Rhone-Alpes de  
Protection de la Nature



Latvian Ornithological Society



CCEG/ECCG



Vereniging Nederlands  
Cultuurlandschap



Confederación en Defensa de la Abeja en la Cornisa Cantábrica CODACC



Asociación de apicultores de la Comunidad de Madrid



Asociación RedMontañas



Sociedade Portuguesa para o Estudo das Aves



Rhodope mountains without borders



Lithuanian Ornithological Society



Vogelbescherming Nederland



BirdLife Austria



Centre for Sustainable Alternatives



Asociación Trashumancia y Naturaleza



Brinzal



Raptor Protection of Slovakia



Fern



Dansk Ornitologisk Forening



ÖBV - Via Campesina Austria



Czech Society for Ornithology



Lipu - BirdLife Italy



Sindicato Labrego Galego



Rural platform of Slovakia



natur&emwelt



AirClim



New Water Culture Foundation (FNCA)



Sustainable Food Trust



MME/BirdLife Hungary



ActionAid



Associazione Italiana per l'Agricoltura Biologica



Legambiente Onlus



European Federation of the Associations of Dietitians (EFAD)



SEO/BirdLife



Ecologistas en Acción



Spanish Council of Land Stewardship



Green Action Association



Iniciativa Comunes



NatureFriends Greece



Unión Nacional de Asociaciones de Caza (UNAC)



ARC2020



Foro Asturias Sostenible