

Reform of the CAP towards 2020: Consultation Document for Impact Assessment

Policy scenarios

(1) Are the policy scenarios outlined consistent with the objectives of the reform? Could they be improved and how?

As an environmental body, we support an increase in the role of instruments relating to the objective of ensuring the provision of environmental public goods and the preservation of countryside. Whilst we believe that the status quo scenario could not therefore be a serious option, we have no definitive views to offer as to whether the adjustment or integration routes would be the better policy scenarios. We do however feel that much better integration between the pillars would be useful, with the proviso that it does not ultimately lead to a net diminution of the resources given to rural development in particular.

(2) Are there other problems apart from those set in the problem definition section of this document that should be analysed when considering the architecture of the CAP in the post 2013 period? What causes them? What are their consequences? Can you illustrate?

The problem definition section represents a comprehensive and balanced summary of the difficulties and we have nothing further to add.

(3) Does the evolution of policy instruments presented in the policy scenarios seem to you suitable for responding to the problems identified? Are there other options for the evolution of policy instruments or the creation of new ones that you would consider adequate to reach the stated objectives?

We support the stated purpose of the reform to increase the role of instruments relating to the objective of ensuring the provision of environmental public goods and the preservation of the countryside and either the gradual changes suggested by the adjustment scenario

Impacts

(4) What do you see as the most significant impacts of the reform scenarios and the related options for policy instruments? Which actors would be particularly affected if these were put in place?

Maintaining and enhancing viable farm businesses and rural economies will be the key to achieving the objectives underpinning the reforms, and whichever

reform scenarios or policy instruments are chosen, the balance between these will be difficult to achieve.

(5) To what extent will the strengthening of producer and inter-branch organizations and better access to risk management tools help improve farmers' income levels and stability?

We have no comments to offer.

(6) What environmental and climate-change benefits would you expect from the environment-targeted payments in the first and the second pillar of the CAP?

We see the maintenance - and where necessary the enhancement - of distinctive landscapes and the individual landscape features which make them locally, regionally or nationally distinctive as a key element of achieving the environmental objectives set out in the paper. In this respect we would emphasise that the definition of 'environmentally valuable landscapes' should encompass their cultural importance, as well as their value as habitats, for biodiversity and for water quality. We would expect the definition of environment to include cultural heritage therefore, and in this respect we would endorse the views set out in the document *Europe's Living Landscapes: Cultural heritage as a force for rural development* ().

(7) What opportunities and difficulties do you see arising from a significant increase of the rural development budget and a reinforcement of strategic targeting?

If we have potential concerns in these areas they arise from, on the one hand, the difficulty of ensuring – given the acknowledged diversity of farming and farming systems both regionally and across the member states – that strategic targeting can be sufficiently flexible to effectively deliver across a range of issues and on the other, the mechanisms underpinning the strategic targeting.

(8) What would be the most significant impacts of a "no policy" scenario on the competitiveness of the agricultural sector, agricultural income, environment and territorial balance as well as public health?

Although there is clearly a difficult balance to be had between ensuring that farm businesses and rural economies remain competitive and sufficient policy instruments to ensure that the environment and public health are not compromised, we believe that a 'no policy' scenario could have disastrous consequences for both.

Monitoring and evaluation

(9) What difficulties would the options analysed be likely to encounter if they were implemented, also with regard to control and compliance? What could be the potential administrative costs and burdens?

We have no comments to offer.

(10) What indicators would best express the progress towards achieving the objectives of the reform?

In respect of ensuring the provision of environmental public goods, we believe that it is appropriate that there is flexibility at the level of individual member states to set appropriate indicators for both the preservation of the countryside and the reduction of environmental damage as a result of agriculture.

(11) Are there factors or elements of uncertainty that could significantly influence the impact of the scenarios assessed?

We have no comments to offer.

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