



## Modernising and Simplifying the Common Agricultural Policy (CAP)

Fields marked with \* are mandatory.

### A. ABOUT YOU

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**\*Country of residence**

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

**\*You are replying**

- as an individual in your personal capacity
- in your professional capacity or on behalf of an organisation

**\*Respondent's first name**

Nikolai

**\*Respondent's last name**

Pushkarev

**\*Respondent's professional email address**

nikolai@epha.org

**\*Name of the organisation**

European Public Health Alliance

**\*Postal address of the organisation**

Rue de Treves 49-51, 1040, Brussels

**\*Type of organisation**

Please select the answer option that fits best

- Private enterprise
- Professional consultancy, law firm, self-employed consultant
- Trade, business or professional association
- Non-governmental organisation, platform or network
- Research and academia
- Churches and religious communities
- Regional or local authority (public or mixed)
- National public authority
- International organisation
- Other

**\*How many employees does the company have?**

- More than 250 employees (Large enterprise)
- Between 50 and 250 employees (Medium-sized enterprise)
- Between 10 and 49 employees (Small enterprise)
- Less than 10 employees (Micro enterprise)
- Self-employed (Micro enterprise)

**\*Please specify the sector.**

- Agriculture
- Forestry
- Rural development
- Agro-food
- Environmental protection
- Trade Union
- Public health
- Research / Think tank
- Civil society
- Other

**\*Is your organisation included in the Transparency Register?**

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- Yes
- No
- Not applicable

**\*If so, please indicate your Register ID number.**

18941013532-08

**\*Your contribution,**

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

## B. AGRICULTURE, RURAL AREAS AND THE CAP TODAY

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*Where asked to select, please choose up to 3 or 5 answers as indicated.*

### 1. Which are the most important challenges for EU agriculture and rural areas?

*at most 3 choice(s)*

- Fair standard of living for farmers
- Adaptation to trends in consumer/societal demands
- Pressures on the environment and on natural resources
- Climate change (mitigation and adaptation)
- Lack of jobs and growth in rural areas
- Uneven territorial development throughout the EU

### 2. Which of the current CAP policy tools are best suited to meet the challenges identified above?

*at most 5 choice(s)*

- Decoupled payments to farmers
- Coupled support
- Support for Rural Development environment and climate actions in agriculture and rural areas
- Support for Rural Development investments in physical and human capital in agriculture and rural areas
- Trade measures
- Market safety nets (e.g. market intervention)
- Risk management schemes
- Support for integration into producers' organisations
- Regulatory approaches (such as standards and rules)

### 3. To what extent does the current CAP successfully address these challenges?

- To a large extent
- To a fairly good extent
- To some extent only
- Not at all
- Don't know

### 4. Which of the following do you think are the most important contributions of farmers in our society?

*at most 3 choice(s)*

- Ensuring that enough food is available
- Supplying healthy, safe and diversified products (quality of food)
- Protecting the environment (soils, water, air, biodiversity) and landscapes
- Addressing climate change (both mitigation and adaptation)
- Contributing to renewable energy
- Maintaining economic activity and employment in rural areas
- Contributing to EU trade performance
- Ensuring the health and welfare of farm animals

**5. To what extent do you agree with the following statement:**

	Largely agree	Partially agree	Partially disagree	Largely disagree
Farm income is still significantly lower than the average EU income	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU farmers face stricter requirements than non-EU ones	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers get a limited share of the prices consumers pay	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers need to make heavy investments for their businesses to be viable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**6. Which are the most important environmental challenges faced by agriculture?**

*at most 3 choice(s)*

- Reduction of soil degradation
- Protection of biodiversity
- Preservation of genetic diversity such as traditional/old varieties and breeds
- Reduction of water pollution
- Rationalise use of water
- More sustainable use of pesticide and fertilisers
- Decrease air pollution
- Environmental risks such as fires, floods etc.

**7. To what extent does the current CAP successfully address these environmental challenges?**

- To a large extent
- To a fairly good extent
- To some extent only
- Not at all
- Don't know

## 8. What are the main barriers to becoming a farmer?

*at most 5 choice(s)*

- Low profitability
- Lack of available land
- High prices of land
- Land regulation
- Difficulties to access credit
- Complexity of insurance schemes
- Inheritance laws
- Taxation
- Administrative requirements
- Access to updated knowledge/technologies
- Image of the sector

## 9. What do you see as major drivers for innovation in agriculture, forestry and the rural economy?

*at most 5 choice(s)*

- Access to vocational training and relevant information
- Access to advisory services delivering farm-tailored solutions
- Dissemination of knowledge
- Financial /investment incentives / support for innovative projects
- New technologies and agricultural inputs
- Support for adjusting to new societal demands (i.e. nutritional guidelines)
- Support to the development of the circular economy
- Better involvement of producers throughout the value chains (up until the consumer)
- New partnerships between different actors (i.e. between farmers, civil society, researchers...)
- Research and the provision of knowledge targeted to farmers' needs

**10. Since 2003, the Farm Advisory Service (FAS) aims at helping farmers to better understand and meet EU rules and good agricultural and environmental conditions. How would you characterise the current situation of the FAS in your respective territory, as regards...**

	Satisfactory	Neutral	Not Satisfactory	Don't know
Availability of advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Access to advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of the service provided	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Independence of advisors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transfer of knowledge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dissemination of new knowledge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**11. To what extent did recent CAP reforms pay sufficient attention to Policy Coherence for Development?**

	To a large extent	To a fairly good extent	To some extent only	Not at all	Don't know
Overall coherence with EU Development Policy and Humanitarian Action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU exports to developing countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU imports from developing countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on local agricultural production in developing countries including land-use change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The availability and affordability of agricultural goods in developing countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**12. What are the main problems/obstacles preventing the current policy from successfully delivering on its objectives? What are the drivers behind these problems?**

*1500 character(s) maximum*

The Common Agricultural Policy (CAP) has not kept up with changing societal imperatives and developments in the legal framework for EU policy action.

Article 168 of the TFEU mandates that “A high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities.” There is little indication that this obligation has been consistently and transparently mainstreamed into CAP policy-making. For instance, health considerations have not been included in policy impact assessments. A health impact assessment (HIA) of agricultural policy would be a significant step towards operationalising Article 168 within the CAP.

The lack of a comprehensive HIA of European agricultural policy could help explain why incentives under the CAP are not consistently aligned with the need to address various widespread public health concerns. Certain incentives even appear to be outright incoherent with health objectives. More details can be found in EPHA’s 2016 report “A CAP for Healthy Living: Mainstreaming health into the EU Common Agricultural Policy” [<http://bit.ly/2m9fgOk>]

Also, see attachment to the consultation for full response.

**13. Which elements of the current CAP are the most burdensome or complex and why?**

*1500 character(s) maximum*

The various incentive instruments that have accumulated under the CAP over the years create a bureaucratic and administrative burden, make it difficult for those involved to understand and engage with the policy and result in a lack of public transparency.

The complex overlapping structure also prevents the CAP from being efficient in delivering concrete social and environmental benefits across key sectors, e.g. jobs, rural economies, public health, food, climate and biodiversity, burdening taxpayers.

## C. OBJECTIVES AND GOVERNANCE

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**14. The work of the European Commission focuses on 10 priorities for 2014-2020, most of which are relevant to the CAP [http://ec.europa.eu/priorities/index\\_en](http://ec.europa.eu/priorities/index_en)**

**Please indicate the most relevant priorities for which the CAP should do more.**

*at most 3 choice(s)*

- Boosting investment, growth and employment
- Improving connectivity and digitalisation of the rural economy
- Mitigating and adapting to the impact of Climate Change and providing renewable energy
- Strengthening the EU Single Market
- Participating in world trade
- Help addressing challenges related to migration

**15. Which of the following should be the most important objectives of the CAP?**

*at most 5 choice(s)*

- Ensuring a fair standard of living for farmers
- Addressing market uncertainties
- Foster competitiveness and innovation of agriculture
- Securing food supply at reasonable prices for consumers
- Encouraging the supply of healthy and quality products
- Contributing to a high level of environmental protection across the EU
- Mitigating and adapting to the impact of climate change
- Developing rural areas while taking care of the countryside
- Achieving a balanced territorial development

## 16. Do you see the need to add objectives for a modernised CAP; if yes, which ones?

*1500 character(s) maximum*

Mainstreaming public health into the CAP is an already existing obligation as laid out in Art. 168 TFEU. The aim of this reform should not be to add more objectives to an otherwise unchanged policy. Rather, modernising the CAP means updating its policy framework. This reform should add the explicit operational objective for the CAP to transition towards an integrated EU common food and agricultural policy, coupled to a timeline.

An integrated EU food and agricultural policy should take a comprehensive approach to the food system, integrating supply, demand and supply chain dimensions. This policy should focus on achieving the essential outcome of a well-functioning food system; namely the creation of food and drink environments that foster the uptake of sustainable, nutritionally healthy diets for the entire European population.

In doing so, the policy should positively contribute to at least the following general objectives:

- 1) Viable and socially equitable food and farming economy
- 2) Environmental sustainability, climate action and animal welfare
- 3) High levels of public health and consumer satisfaction
- 4) Transparency and a participatory approach to food policy formulation

**17. Do you agree with the following statement: "It makes sense to have a Common Agricultural Policy because we need ..."**

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Common rules, as part of the Single Market (market organisation, trade, competition rules, food safety standards)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common objectives to tackle cross-border challenges (food security, environment, climate change, biodiversity...)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A common budget as it is more efficient	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic, social and territorial cohesion and solidarity among Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common positions at international level making the EU a stronger global actor	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A common framework for sharing best practices, research results, innovative ideas, mutual learning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

18. At which level do you consider that the following CAP objectives should primarily be dealt with?

	EU level	National level	Regional/local level	Don't know
Ensuring a fair standard of living for farmers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing market uncertainties	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Foster competitiveness and innovation of agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Securing food supply at reasonable prices for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encouraging the supply of healthy and quality products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a high level of environmental protection across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mitigating and adapting to the impact of climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Developing rural areas while taking care of the countryside	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving a balanced territorial development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## D. AGRICULTURE, RURAL AREAS AND THE CAP TOMORROW

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**19. Do you agree with the following statements:**

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Farmers need direct income support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other policies can have a strong impact on agricultural income (e.g. heritage/tax law, social and pension systems)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agricultural policy should deliver more benefits for environment and climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted investments to foster restructuring and innovation should be supported	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving farmers' position in value chains (including addressing Unfair Trading Practices)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**20. Do you think that the following actions under the CAP could improve the competitiveness of farmers?**

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Supporting the development of futures markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing transparency in the agricultural markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the integration of farmers in Producer Organisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support for Research & Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplifying administrative procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**21. Which of the following criteria are most relevant when allocating direct support?**

*at most 5 choice(s)*

- Specific products and/or sectors
- Risk management tools
- Compensation to farming activities in Areas with Natural Constraints/ High Nature Value Areas
- Territories with higher agricultural potential
- Practices with the highest environmental/climate benefits
- Linkage to standards (e.g. food safety, labour)
- An equal level of support for farmers within the same territory
- Small producers
- Limit in support for large beneficiaries (capping)
- Young Farmers

**22. Which actions could further improve the EU export performance?**

*at most 3 choice(s)*

- Export promotion
- Export credits
- Specific action on Geographical Indications
- Further trade liberalisation
- Address non-tariff barriers
- No action needed

**23. Considering consumer and wider societal demands, where can the linkage between CAP and standards be improved?**

*at most 3 choice(s)*

- Food safety standards
- Human nutrition standards and guidelines
- Standards for fair trade products
- Standards for organic products
- Environmental and climate standards
- Standards for the use of antimicrobials/pesticides
- Animal and plant health standards
- Animal welfare standards
- Labour standards

**24. When it comes to meeting higher production standards, do you agree with the following statements?**

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Enhanced results can be achieved with financial incentives on a voluntary basis, without increasing mandatory levels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If mandatory levels are increased, farmers need support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers have to respect stricter rules without specific financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Awareness campaigns are needed to raise the willingness of consumers to pay more for farmers' respect of stricter standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**25. For which of the following environmental protection objectives should the CAP do more?**

*at most 3 choice(s)*

- Prevention and reduction of water pollution (pesticides, fertilisers)
- Sustainable use of water
- Prevention of environmental risks such as floods
- Prevention of biodiversity loss
- Prevention and reduction of soil erosion
- Avoiding soil salinization, compaction and desertification
- Contribution to the Air Quality Plans



**26. Which are the most important objectives for the CAP to better address climate change?**

*at most 3 choice(s)*

- Reducing Green House Gas (GHG) emissions in the agricultural sector
- Fostering carbon conservation and sequestration in agriculture and forestry
- Improving climate change adaptation and enhancing the resilience of agriculture production systems
- Promoting afforestation and sustainable forest management
- Providing sustainable renewable energy resources
- Promoting research to address plant and animal diseases linked to climate change
- Promoting diversification of farming systems

**27. In which of the following areas do you consider that the CAP should strengthen its support to sustainable forest management?**

*at most 3 choice(s)*

- Forest fire prevention and restoration
- Mobilisation of forest biomass for the production of material and energy
- Increase of the resilience and protection of forest ecosystems
- Afforestation/reforestation
- Prevention of natural disasters and catastrophic events in forests such as pests or storms
- Agroforestry systems

**28. Where should the CAP improve its contribution for rural areas?**

*at most 5 choice(s)*

- Fostering innovation through knowledge transfer, advice and vocational training
- Taking care of local know-how and products in line with EU's diversity and providing the basis for EU quality products
- Addressing local needs by supporting the provision of local infrastructure/services (e.g. health care, child care, transport)
- Fostering the economic viability of agriculture throughout the EU, avoiding concentration of production and people in certain areas
- Enhancing the interplay between local production and local markets
- Enhancing quality of life and social inclusion of rural inhabitants
- Strengthening governance and local development through bottom-up initiatives such as LEADER
- Fostering rural tourism and recreation, including through the provision of landscapes benefits, cultural values and traditional local food
- Creating and maintaining jobs in rural areas, including in primary agricultural production
- Providing connectivity and digital solutions
- Contributing to societal and cultural capital for rural areas to stay vital living spaces and to establishing mutually beneficial rural-urban linkages
- By helping SMEs to create jobs in rural areas

**29. How can the CAP better help young farmers or other young rural entrepreneurs?**

*at most 3 choice(s)*

- Supporting business start-up
- Providing transitional top-up payments to young farmers
- Improving access to financial instruments
- Providing more support for investments
- Supporting knowledge transfer, advice and vocational training
- Putting in place incentives to stimulate the cooperation between different generations
- Incentivising the transfer of farms
- Supporting new forms of cooperation

**30. What would be the best way to encourage innovation?**

*at most 3 choice(s)*

- Support the engagement of farmers in innovative projects
- Address the knowledge gap amongst farmers
- Support knowledge exchange through better access to advisory services, networking among farmers and demonstration farms
- Improve the technical competence and impartiality of advisory services
- Develop IT infrastructure for knowledge exchange
- Provide better access to finance / investment

## **E. WRAP UP: MODERNISATION AND SIMPLIFICATION**

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**31. Do you think the CAP could be simpler if:**

	Largely agree	Partially agree	Partially disagree	Largely disagree	Don't know
Overlaps between Rural Development and other CAP Measures would be reduced	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Databases and technologies (remote sensing, smart phones) were better used to reduce the incidence of farm inspections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E-government services were more extensively used	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lump-sum approaches were extended	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More choice was given to farmers in terms of environmental measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**32. Do you have concrete ideas for simplifying the CAP and reducing the administrative burden for farmers, beneficiaries (or public administrations)? Please specify and explain the reasons behind your suggestions.**

*1500 character(s) maximum*

Doing away with the various layers of incentives that have accumulated over the years and replacing it with a clearer, performance-oriented support structure will help to simplify the policy and reduce the administrative burden for all involved.

In the process of modernising and simplifying the CAP, the model of direct payments as the main source of benefits should be revisited, so that incentives are better adapted to serve public health and other sustainability objectives.

### 33. Do you have more ideas for modernising the CAP?

*1500 character(s) maximum*

Modernising the CAP means updating its policy framework and starting a transition pathway towards an integrated EU common food and agricultural policy. This policy should focus on achieving the essential outcome of a well-functioning food system; namely the creation of food and drink environments that foster the uptake of sustainable, nutritionally healthy diets for the entire European population.

The CAP, both in its shorter-term future and as part of a wider food systems policy, should better link payments to desirable results, like the production of public goods. Better targeted incentives will be critical in securing continued public support, and budget, for the policy.

- I. Remove health-harmful subsidies
- II. From hectare payments to performance incentives
- III. Focus on fostering sustainable healthy diets

See attachment to the consultation for full response.

### 34. Please feel free to upload a concise document (maximum 5 pages), such as a position paper. The maximal file size is 1MB.

*Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is optional complement and serves as additional background reading to better understand your position.*

**1226ac98-13bd-427e-944e-c4a1016480b6/Response\_Q12\_and\_33\_CAPconsultation\_EPHA\_28.04.2017.pdf**

## Contact

[https://ec.europa.eu/agriculture/consultations/cap-modernising/2017\\_en](https://ec.europa.eu/agriculture/consultations/cap-modernising/2017_en)

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