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Mr Jannusz Wojciechowski  
Commissioner for Agriculture  
European Commission  
Rue de la Loi / Wetstraat 200  
1049 Brussels  
Belgium

Brussels, 9<sup>th</sup> February 2021

## **RE: Copa and Cogeca views for the next trilogue meeting on the CAP Strategic Plans Regulation**

Dear Commissioner,

In view of the next trilogue meeting on the CAP Strategic Plans Regulation on 10<sup>th</sup> February, Copa and Cogeca would like to share with you some of our views regarding the possible topics of discussion.

### On the general and specific objectives

Copa and Cogeca consider that the current objectives of the CAP as established under Article 39 of the Treaty on the Functioning of the European Union (TFEU) remain valid and very relevant. Copa and Cogeca also support the nine specific objectives established for the CAP as they attempt to strike a balance between all three pillars of sustainability – economic, environmental and social. This balance should be safeguarded during the trilogue negotiations. Ensuring the competitiveness and growth of the sector will also foster sustainable development and a more efficient management of natural resources.

### On the new delivery model and the CAP Strategic Plans

Copa and Cogeca has stated in multiple occasions the support to the new delivery model and the result-based system provided that it brings simpler requirements, simpler, more practical and realistic measures and guarantees timely payments to farmers.

We must equally ensure coherence between the CAP Strategic Plans regulation and the Horizontal regulation regarding the performance framework. With a shift from compliance to performance, the indicators will play a pivotal role in linking expenditure to output, measuring progress to targets, and assessing the impact of the policy. Indicators must therefore reflect the EU specific objectives built on the three pillars of sustainability – economic, environmental, and social – in a balanced way. Copa and Cogeca welcomed the reduction of indicators put forward by the European Commission and rejected any addition of further indicators. CAP performance must be assessed against all three pillars of sustainability, in an equal manner, otherwise this will go contrary to the CAP's own specific objectives. Moreover, no additional reporting or control requirements that would represent more red-tape and administrative burden for farmers and/or EU or Member State administrations should be introduced.

We also support the approach of establishing a single CAP plan per MS. However, we are concerned about how such plans will be developed and implemented in practice in countries with strong regional autonomy. Indeed, this may result in distortions and inequalities both

between Member States and between regions within a Member State. In such cases, a comprehensive approach integrating regional differences must be ensured.

#### On the control and penalties system

Copa and Cogeca strongly believe that consistent application and implementation of expressly proportionate and appropriate control and sanction requirements, tolerances and bagatelles, automated application procedures and further flexibility through digitalisation can help to quickly pay out CAP premiums for additional services by farmers.

#### On the definition of active/genuine farmer

In the context of subsidiarity, the proposals for the future CAP allow MS to establish the main definitions and eligibility criteria, provided they remain within the common EU framework. While we underline the need to safeguard the communality of the policy, we recognise that a degree of flexibility needs to be given to MS. This, however, must not lead to distortion of competition across MS nor must it create divergent approaches in the EU.

We must strive for a clear definition of genuine farmer across the EU, which is based on real and effective agricultural activity. CAP support must target active farmers, that is, those producing food, feed, fibre and renewable energy, who contribute to a sustainable sector and provide public goods and growth. This should not preclude or exclude the eligibility of those farmers who have established additional sources of income to secure their livelihood (e.g. part-time farmers and agri-tourism). In line with past legislative changes, MS could maintain the flexibility to better target the support (in terms of eligibility). Thus, it should be possible to design a common framework whilst also allowing for the definition to be adapted to the real needs and conditions of MS.

Eligibility criteria such as the minimum area threshold should also aim to better target support at active farmers and limit support where there is no clear EU added value, taking into consideration the different farm structures in the European Union. Eligibility criteria – falling under the responsibility of MS – must not, under any circumstances, lead to the weakening of common rules and of the Union's single market.

Faithfully yours,

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CC : Mr Wolfgang Bartscher, Director-General of DG Agri