Dear Member of the European Parliament,

More than two years after the presentation of the CAP reform proposal for post 2020 – two years in which almost no progress has been made in defining the position of the European Parliament and the Council – it would seem that we have entered into a new phase of "state of emergency" where the objective is to close the reform negotiations as soon as possible, at all costs.

It is clear to European Coordination Via Campesina (ECVC) that this rush to close negotiations is a result of the fear felt by those who defend the current status quo of the CAP, regarding the changes that could be made to the CAP reform as a result of the debate on the Green Deal, the Farm to Fork Strategy and the Biodiversity Strategy.

Seeing where the debate in the European Parliament and in the Council is heading, ECVC has very low expectations for the reform underway today. We fear that, as well as renationalising the CAP, it will be a continuation of the previous reforms, maintaining the current concentration of subsidies (which will continue the current deterioration in production prices). This is combined with a trade policy geared to the world market, which will mean farmers continue to make up one of the poorest sectors of European society, with incomes that are 50% lower than the rest of society. The current reform will not prevent or solve the disappearance of thousands more farms each year, the ageing of the agricultural population, the desertification of rural areas, the intensification of production models and the consequent deterioration of food quality and negative impact on the environment, among many other problems.

For ECVC it is clear that the European Parliament is getting closer to defining its position. When it comes to the Common Market Organisation regulations, the Parliament’s position has the potential to improve the European Commission’s proposals. However, with regards to CAP Strategic Plan Regulation, the position of the Parliament only weakens the already unambitious proposals of the European Commission. This is particularly true regarding the instruments that demand a better distribution of the first pillar CAP subsidies.

We do not understand the concern for the approximate 2% of CAP beneficiaries that receive about 30% of first pillar aid who would be negatively impacted by the application of these instruments. The measures would facilitate a better distribution of the aid, are motivated by the social value they can represent and could alleviate the injustice that currently exists: at present, 80% of the beneficiaries of the CAP receive only 20% of the total aid, and around 40% of European farmers do not benefit at all from this type of aid, despite being equally hampered by compliance with more rules and a policy of low production prices.
We do not understand the position that emerged from the previous COMAGRI, rejecting a reduction in the share of direct payments received above €60,000 per farm and limiting the redistribution that could come from the application of the subsidy limit and redistributive payments to 10% of the national budget.

It is in this context, and in a final effort, that ECVC requests your attention to the following 6 main aspects:

- **Small farmers' scheme:** the decision of the previous COMAGRI to place a maximum aid of €1250 per beneficiary **must be reversed**;

- **Capping and redistributive payments:** the decision of the previous COMAGRI to limit to a maximum of 10% of the total national budgets for the first pillar of the CAP and to withdraw the gradually decreasing support for beneficiaries receiving between €60,000 and €100,000 of direct payments per year **must be reversed**. Member State’s obligation to apply capping measures must be reaffirmed.

- **Eco-schemes:** Henceforth, pre-existing sustainable production models, such as agroecology (fitting the definition given by the FAO) and organic agriculture must be integrated into Eco-schemes without requirements to introduce new practices. Similarly, it is essential that super-intensive models (such as smart agriculture or precision farming) that are totally unsustainable are withdrawn from Eco-schemes, even if they do introduce some more environmentally friendly practices;

- **Definition of eligible hectares:** Maintaining land in good agricultural condition should not be considered sufficient as a minimum activity, **unless** the area is integrated in a rotation practice;

- **Social conditionality of aid:** Social conditionality of aid must be implemented, making it mandatory for beneficiaries to comply with current labour legislation and making it possible to claim back subsidies in the case of serious infringements;

- **Public Regulation:** It is essential to support all initiatives that arise, in order to integrate mandatory public regulation into the CMO regulation in the event of serious distortions on agricultural markets.

Yours faithfully,

José Miguel Pacheco Gonçalves
ECVC Coordinating Committee member

On behalf of the Coordinating Committee of European Coordination Via Campesina