



## 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**

**\*Respondent's last name**

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

**\*Name of the organisation**

**\*Postal address of the organisation**

**\*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.**

02019258940-59

**\*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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU farmers face stricter requirements than non-EU ones	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Farmers get a limited share of the prices consumers pay	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Access to advice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of the service provided	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Independence of advisors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Transfer of knowledge	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Dissemination of new knowledge	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU exports to developing countries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU imports from developing countries	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
The availability and affordability of agricultural goods in developing countries	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

We believe that the main barrier to real reform lies in the current decision-making process around the CAP. The current process is bogged down by vested interests stifling reform. To achieve real reform, we need stronger voices in the debate from sectors other than agriculture: notably environment, but also climate, community development, consumer (protection) groups, etc. We advocate joint ownership of the next CAP, from the EU level (involving several Parliament committees, EU Council formations and Commission DGs) to the national and regional levels where the policy is finally tailored and implemented.

This failure is evidenced through the last CAP negotiations, when greening measures became meaningless after being watered down by agriculture decision makers. As a result, taxpayers spent over €16 billion Euro for "greening on paper" without any substantial change in farming practices. This also led to a decrease in the environmental ambition of Pillar 2.

The CAP has also repeatedly failed to deliver for the average farmer. With the biggest share of the budget going to the largest farms (80-20%), most farmers lose out, often those whose land is host to the most biodiversity. This process often culminates in the perverse situation where the "polluter is paid" rather than the "polluter pays". With the right process in place, and the right voices ensuring that public money delivers public goods, the CAP can deliver on the environmental and societal objectives.

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

*1500 character(s) maximum*

While we acknowledge that many aspects of the current CAP create administrative burdens on farmers and governments, an over-simplistic policy would be unable to deliver on the CAP's targets, nor would it justify the use of public funds. A balance must be struck between the level of complexity for farmers and the delivery of objectives for tax payers. The Einsteinian principle is applicable here: as simple as possible, but no simpler! Experience has shown that in some instances – such as some advanced level agri-environment schemes – complex management prescriptions, or a need for extensive results monitoring, are perfectly justified considering the high-level environmental targets the schemes deliver on.

There are two main areas of the CAP's first pillar where farmers and NGOs both agree that the current policy is unnecessarily burdensome:

- 1) Greening payments: the flexibility granted to Member States has made this "simple" policy relatively complex. It is now perceived as burdensome by farmers and paying agencies, while research shows that it is barely delivering for the environment. (Reference: <http://bit.ly/2lLIeR7>)
- 2) Eligibility of pastures for direct payments: livestock farmers using woody pastures and complex land types face high levels of bureaucracy and uncertainty when claiming their pastureland for direct payments, due to increased controls and restrictions based on an over-simplistic and unscientific assessment of land use. (Reference: <http://bit.ly/2lfsaJw>)

## 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*

Meeting the Sustainable Development Goals: seven out of seventeen SDGs have direct relevance for European agriculture. The CAP is the key tool for meeting these international commitments.

Goal 12 requires Europe to achieve the "sustainable management and efficient use of natural resources" by 2030, while Goal 2 states that we "ensure sustainable food production systems and implement resilient agricultural practices" as well as "maintain ecosystems". Further, under Goal 15, Europe has committed to reverse land degradation and halt biodiversity loss. Further, Goal 6 also states that by 2020, we must protect and restore water-related ecosystems, including mountains, forests, wetlands, rivers, aquifers and lakes, which are all affected by agricultural production.

Other international agreements: The Paris Agreement on Climate Change, The Global Convention on Biological Diversity (CBD) and the EU air quality laws are all crucial objectives for the next CAP.

**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 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 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to a high level of environmental protection across the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mitigating and adapting to the impact of climate change	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving farmers' position in value chains (including addressing Unfair Trading Practices)	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhancing transparency in the agricultural markets	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supporting the integration of farmers in Producer Organisations	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>
Simplifying administrative procedures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>
E-government services were more extensively used	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lump-sum approaches were extended	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
More choice was given to farmers in terms of environmental measures	<input type="radio"/>	<input type="radio"/>	<input checked="" 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*

The new policy should first and foremost be fit for purpose. That means it should be effective, efficient, relevant and coherent with other policies and show EU added value.

Simplification for the sake of simplification, and without looking at how well the policy achieves its goals, is nonsensical. Simplification should ensure that public benefits are achieved effectively and efficiently.

However, we do agree that the current CAP is burdensome for beneficiaries, administration and from a perspective of citizens interested in understanding what value they get for their taxes.

We often see that complications are derived from the many exemptions and loopholes created to dodge the official goal of the policy. Clear examples can be found in our answer on question 13.

For beneficiaries, administrations or citizens alike, the current policies are very complicated to understand, to apply for or to implement at national level. The easiest way to simplify the policy is therefore to abolish the parts of the CAP that are no longer justifiable (e.g. harmful subsidies) and refocus the budget and effort on targeted, smart, well planned and monitored measures or contracts that have clear objectives. A real effort should be put on making them work not just at the policy level but also on the ground. More specific question 33.

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

*1500 character(s) maximum*

A modern CAP should start with a fundamental shift away from the current 2 pillars approach. Area based payments supporting unsustainable practices should cease and the "Polluter pays" principle should be the guiding principle. The priority should be on the full implementation of environmental legislation, as well as legislation on related issues such as animal welfare and health, coupled with taxing pollution. The CAP should also contain payments for ecosystems services. Concretely, this could take a programmatic approach, building on and developing the existing LIFE approach: rewarding concrete results with payments. Such environmental payments should be managed or at least overseen by environmental authorities.

Furthermore, the new CAP should help prevent land abandonment where it would have negative social and environmental impacts. It would need to have clear environmental goals. Special attention should also be given to the production of nutritious food and the promotion of healthy diets, which is currently not the case. This could be achieved by setting up short supply chain mechanisms, nutritional education in schools and local projects in urban areas.

Finally, special attention should be given to transition: the new policy should help farmers who have invested in unsustainable farming models to move towards sustainable ones. This should be limited in time.

**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.*

**e31db7a5-bc39-43cb-8c08-b84a52dfc9e2/Position\_of\_WWF-  
Romania\_concerning\_the\_reform\_of\_the\_Common\_Agricultural\_Policy\_\_March\_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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