

CONSULTATION FOR THE IMPACT ASSESSMENT ON THE "COMMON AGRICULTURAL POLICY TOWARDS 2020" PROPOSALS

I. PERSONAL DATA II. CONSULTATION QUESTIONS As part of the preparation of legislative proposals for the Common Agricultural Policy after 2013, scheduled for mid-2011, the Commission Services solicit input from interested parties to complete the diagnosis and exploration of options for reform outlined in the Communication "Meeting the food, natural resources and territorial challenges of the future" and in the consultation document for the impact assessment which can be accessed below.

Please visit the Webpage CAP post-2013 for more information

http://ec.europa.eu/agriculture/cap-post-2013/consultation/index_en.htm

Please note that when submitting your contribution you are accepting the privacy statement, which is available here.

I. PERSONAL DATA

To help us analyse the responses to this consultation, please provide the following information about you and/or your organisation.

1. For the purpose of the analysis of this consultation you want to be identified as: **(compulsory)**
(at least 1 answers)

- Organisation from the farming sector
- Organisation from the processing sector
- Organisation from the retail sector
- Organisation from the trade sector
- Environmental organisation
- Development organisation
- Consumer organisation
- Think tank and research institutes
- National Authority
- Regional and local authority
- Third country

X Others

- European Alliance of Civil Society Organisations

2. If you are submitting this questionnaire on behalf of an organisation please precise its name, field of action and your position within the organisation. **(compulsory)**
(maximum 500 characters)

Agricultural and Rural Convention
(IHECS)
Rue de l'Etuve 58-60, 1000 Brussels
Tel: +32 2 549 55 37
Fax: +32 2 513 61 23

Field of action: The aim of ARC, the Agricultural and Rural Convention, is to give civil society a strong voice and to prepare a powerful common message for a new European agricultural and rural policy.

Coordinator: Hadjamu, Grischa

3. Please state your name **(compulsory)**
(maximum 100 characters)

Hadjamu, Grischa

4. Please state your email address. **(compulsory)**
(maximum 100 characters)

contact@arc2020.eu

5. Is the organisation you are presenting is registered in the Interest Representative Register?
(compulsory)
(at most 1 answer)

Yes

No

If yes, please state your registration number **(optional)**
(maximum 100 characters)

If no, register here (optional)
(maximum 1 characters)

6. Please indicate the country you are based in : (compulsory)
(at most 1 answer)

- AT – Austria
- BE – Belgium
- BG - Bulgaria
- CY - Cyprus
- CZ - Czech Republic
- DE - Germany
- DK - Denmark
- EE - Estonia
- EL - Greece
- ES –Spain
- FI - Finland
- FR - France
- HU – Hungary
- IE – Ireland
- I T – Italy
- L T – Lithuania
- LU – Luxemburg
- LV – Latvia

M T – Malta

NL – Netherlands

PL – Poland

P T – Portugal

RO – Romania

SE – Sweden

SL – Slovenia

SK - Slovak Republic

UK -United Kingdom

European Union (trans-national organisation)

Other

7. Received contributions, together with the personal data of the contributor, may be published on the Commission's website. However, the contribution may be published in anonymous form. Do you want your contribution to be published together with your personal data? **(compulsory)**
(at most 1 answer)

Yes, you can publish this contribution with my personal data.

No, publish my contribution without my personal data.

No, I do not want my contribution to be published on the Commission's website

II. CONSULTATION QUESTIONS

The description of issues, objectives, options and scenarios developed in the consultation document tries to sum up various ideas that were put forward in the public debate. It represents a certain choice with regard to issues tackled, main objectives and possible policy evolutions. This consultation process calls on interested parties to express their opinion on the relevance of the described elements, the consistency of approach and possible improvements that could be made. The public consultation also allows to acquire a broad range of information and knowledge on the expected effects that each broad policy scenario and consequent changes to the CAP instruments. The stakeholders are invited to provide factual, analytical contributions that will complement other sources of information in assessing the impacts of policy reform. In order to guide and structure the contributions, the following questions were prepared by the Inter-service Steering Group:

POLICY SCENARIOS

If you have relevant documents (graphs, charts,...) that you would like to attach to your contribution, you may upload it below the answer fields.

1. Are the policy scenarios outlined consistent with the objectives of the reform? Could they be improved and how? **(optional)**
(maximum 3000 characters)

We welcome, and broadly endorse, the statement of issues in section 2 of the Consultation Document. However, we believe that the statement of Objectives does not adequately reflect what these issues imply for policy. Building on the words that you use, we suggest that the headlines in Section 3 should read (new words underlined):

- Developing the agricultural production capacity on a sustainable basis throughout the EU
- Ensuring food security, safety and quality in a manner consistent with public health, environmental and ethical standards and global equity
- Ensuring the provision of environmental public goods such as the sustainable management of farming systems, natural resources and the preservation of the countryside
- Contributing to the vitality of rural areas and territorial balance throughout the EU.

Judging the policy scenarios from the perspective of this extended set of objectives, we see the need for a **Sustainable Scenario** which draws elements from all three of those set out in the 4.1, 4.2 and 4.3 of the Document and which includes some dimensions not included in those scenarios. It would have :

- a thoroughly revised policy framework, reinforcing the 4 objectives in both Pillars
- a gradual re-focus of support to farmers over the 2014 to 2020 period
- a division of the Single Payment Scheme into :
 - a basic income component, at a harmonised level throughout the EU, capped to avoid large payments to single beneficiaries, and subject to conditionality related to sustainable standards in agriculture
 - targeted payments for environmental services which go beyond existing regulations
- strengthened market measures as a safety-net, with more focus on the whole food chain, and a wider range of risk management instruments financed under the first Pillar
- a significant shift of funding towards rural development, focused on the new challenges, on innovation and on a social, economic and environmental renaissance for weaker rural regions, including support for regional and local production and processing of food
- a strengthened approach to strategic targeting, with a common strategic framework for EU funds and with provision for production and implementation of sub-regional strategies by local multi-sector partnerships.

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? (optional)
(maximum 3000 characters)

The following issues should be brought into the analysis :

- **Food waste** : at least one third of all food produced within or imported into the EU is wasted, because of practices in all parts and aspects of the food chain, including the purchasing, processing and selling policies of food processors and traders, transport and storage systems, consumer behaviour etc.
- **Public procurement of food** : creative action in this field could help enormously to promote affordable use of foods of good quality, natural, healthy, nutritious and regionally sourced, but such action is currently inhibited by EU regulations and other factors.
- **Farm succession and access to land** : a very high proportion of farmers are of advanced age, without clear plans for succession by younger people : young farmers may also lack access to land, because of high land prices and land speculation, and also to adequate training. Policies are needed to address these issues.
- **Animal welfare** : the welfare of farm animals is an integral part of our concept of sustainable farming, and should be emphasised in any scenario.
- **Regional and local food systems and direct producer-consumer relations**: such systems should play a growing role in future, but depend upon effective policy support in order to be viable and competitive.
- **Micro-enterprises and SMEs** : these form a large part of the economy of most rural areas, but their viability is threatened by bureaucratic demands of all kinds and lack of official support.
- **Subsistence farming communities** : these communities, in which over 10 million people live, face a bleak future unless they are assisted through a dynamic and integrated approach to rural development.
- **Rural poor and vulnerable** : about 10 million people live below the poverty line in rural areas within the EU : they include concentrations of poverty and exclusion among certain minorities, including many Roma people : in most countries, their needs are not effectively addressed by current rural development programmes.
- **Policy consistency** : there are current inconsistencies between policies, both within the CAP and between it and other EU programmes : a future strategy must ensure that such inconsistencies are eliminated.
- **Governance and finance**. The Consultation barely mentions the major issues of national match-funding; the pressure on all public funds due to broadly imposed austerity measures; the relative roles of, and potential for partnership between, the public, private and civil sectors; the LEADER programme; or the potential for complementarity between policies and programmes for agricultural, rural, regional, social, cohesion and fisheries development.
- **Trade and Development** : policies for these should be consistent with each other and fair to farmers, both in developing countries and in Europe. EU policies including the CAP should be harmonised in order to contribute to the vitality of rural areas, to address problems of poverty and to achieve territorial cohesion.

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? (optional)
(maximum 3000 characters)

The challenges described in Section 2 of the Document call for a more dynamic and radical shift of policy than is implied in any of the three central scenarios. At present, farm incomes are depressed, the farm labour force is falling rapidly, greenhouse gas emissions must be cut, loss of biodiversity must be halted, rural vitality must be revived, food safety must be assured. We need more than a gradual evolution of policy. The period 2014-20 must mark a decisive shift, into a **new paradigm for agriculture and food systems** and a **renaissance for rural areas**.

ARC's Communication sets out the policies that can contribute to this shift. Some of them appear also within the scenarios in the Consultation Document. But it does not include the following, which are vital parts of an integrated package of policies :

- **Transition from industrial to sustainable farming everywhere**, by means of clear definition of progressive standards of sustainability in agriculture; incorporation of these standards into updated legally binding codes of good practice, with efficient enforcement of these codes; conditionality related to those standards on future direct payments to all farmers; reformed systems of training and advice on sustainable practices, agro-ecological innovation, food processing and building community connections.
- Policies for **food security, trade, aid and supply management** which together assure food security for Europeans and guarantee to farmers the fair return that was promised in the Rome and Lisbon Treaties.
- Policies for **food safety and quality**, with the links to public health; for reduction of food waste; and for promotion of regional and local production and processing of food.
- **Vigorous and integrated programmes of rural development**, focused on strengthening and diversifying rural economies, strengthening rural communities, services and infrastructure, and addressing the needs of subsistence farming communities, the poor and vulnerable and other special areas.
- **Policies for affordable, secure and sufficient access to land** to develop and maintain sustainable and small-scale farming throughout Europe.
- **Mechanisms at EU, national and regional level** which achieve true synergy and complementarity between policies for agricultural, rural, regional, social, cohesion and fisheries development.
- Creation, throughout the rural territories, of **sub-regional partnerships** with the task of preparing and implementing sub-regional or territorial development strategies, with powers to deliver all relevant measures within the Operational Programmes related to all five EU Funds. This new family of sub-regional partnerships would draw upon the principles and methods developed through the four programme periods of LEADER, the value of which has been shown by the ex-post evaluation of LEADER+ 2000-06. In this way, the energies and resources of the public, private and civil sectors will be harnessed to addressing the specific needs of each sub-region.

IMPACTS

If you have relevant documents (graphs, charts,...) that you would like to attach to your contribution, you may upload it below the answer fields.

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? **(optional)** (maximum 3000 characters)

We believe that the Commission should ask itself, “What impacts do we wish to achieve, and what policies do we need in order to achieve those impacts ?”.

Our answer to those questions would include :

- Halt the loss of biodiversity in rural areas, by focusing farm and forest support systems on encouragement and extension of farming regimes which enhance biodiversity
- Secure a high level of delivery of public goods by encouraging the uptake of farm systems such as organic farming and the maintenance of high nature value farming
- Meet the climate challenge by further reduction of greenhouse gas emissions (through clear GHG limits in codes of farming practice), by assisting adaptation to climate change within agricultural regimes, by effective designation and protection of agricultural Natura 2000 sites especially along migration corridors, and by effective implantation of the Water Framework Directive, e.g. by restoration and maintenance of wet meadows and also marginal buffers such as ditches.
- Achieve a better balance in the food chain by strengthening the position of farmers and consumers and assuring fair production-cost-based prices for both groups.
- Make the cultivation of land and livestock farming again a profession with good future and income by a revised system of supports, payments for public goods and market measures
- Halt the disappearance of farms and agricultural land throughout Europe and support sustainable and small-scale farming by providing adequate training, supporting affordable and secure access to land, and encouraging community connections.
- Sustain employment in farming, and support family farms, through the terms of farm support systems.
- Cut food waste by close examination of all causes of that waste and use of regulations, education etc to address these causes.
- Reduce food miles by promotion of local and regional food systems, and of closer relations between producers and consumers.
- Reduce dependence of EU farmers upon farm inputs from outside Europe by promoting more sustainable farm systems, low-input breeds and production and use of animal-feed proteins within Europe.
- Reduce the emigration of young people from remote or disadvantaged rural areas by action to make agriculture profitable and attractive, to diversify the rural economies, and to sustain services in these areas.
- Enlist the knowledge, capacities and resources of all stakeholders in the process of

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? (optional)
(maximum 3000 characters)

We believe that farmers would be better able to achieve a fair deal in the food chain if they were enabled, and supported, to create influential producer organisations and **trading groups** in order to increase their bargaining power and to create added value for re-investment in local and regional economies. This may depend upon well-considered relaxation of competition rules.

But that alone will not suffice to improve farmers' income levels and stability. There is need also for **creation of a market monitoring system** which ensures greater market transparency through continuous monitoring of margins, the movement of demand and of prices and the evolution of average production costs; and which, on the basis of these average production costs, determines a target price corridor for certain products. Farmers, consumers and other societal groups should be involved in this process. Moreover, farmers – working collectively in producer organisations – should have the right and the capacity to manage supply at EU level : for example, they should be able to lower the volume to be produced by farmers when demand decreases and prices fall below the fixed price corridor.

There should also be change in the **systems of price intervention**. The present systems, which aim to keep prices low for raw materials for the (exporting) food industry, provide no sufficient safety net for producers who manage their farms according to sustainable principles, because the intervention prices are far below the production costs : it should be scrapped. Instead, we propose a new fair-priced producer-financed intervention system, to complement the process of managing supply described above. It would allow the stocking of products during the short periods that are needed to adapt supply to changes in demand.

These measures lie largely within the remit of the Commissioner for Agriculture and Rural Development. But the ability of European farmers to thrive depends also on **policies for food trade and aid**, as we explain in our ARC Communication. The Commission and Member States should focus primarily on satisfying the needs of the European domestic market, plus the production of products of high added value which can be exported without budgetary assistance. Balanced commodity markets and the strengthening of the position of producers are the best condition for remunerative prices for farmers and for the well-being of agriculture throughout the EU.

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? (optional)
(maximum 3000 characters)

We wish to see the maintenance and effective management of the rich and highly diversified heritage of ecosystems, cultural landscapes and other environmental assets including soil and water resources, which are found in the rural areas of the EU. This heritage is of global value in its own right, and fundamental to the long-term health of the EU's land and thus to its long-term food security and the health of its forests. All elements of future policy, including (but not confined to) environment-targeted payments, should be designed to achieve that aim.

The EU is already committed to halting the loss of biodiversity, which is itself a major challenge within this broad heritage. We urge that strong attention be given also to cultural landscapes, which are a major European asset. 23 EU MS have now ratified the European Landscape Convention, and have thus committed themselves to reflect landscape values in all their policies, including those for agriculture and rural development. The new EU Policy should protect landscape values.

The policy must also focus on the 'new challenges' of adapting to and mitigating climate change, generating renewable energy, cutting emissions of greenhouse gases, reducing dependence on fossil fuels and on inputs derived from those fuels, and putting good agronomic sense and agro-ecological innovation at the heart of farming decisions. For example, appropriate farm regimes such as permanent pasture (adapting the definition in the current system, so that C is not lost via cyclical ploughing or "renewal" of PP) and wetland management can contribute substantially to the sequestration/capture of C.

A matrix of habitats such as wet meadows and ditches, streams serve as migration corridors and as buffers for water regulation, absorbing and storing water, re-charging aquifers in floods and acting as reserves in droughts. We need such buffers as part of the agricultural system; agricultural wetlands need preserving, rehabilitating or restoring. (Non-agricultural wetlands should be covered in Natura2000, dealing with this climate change adaptation & mitigation need).

A water-based approach with emphasis on wetlands to adapt agriculture to climate change fits with the water framework directive. Suitable irrigation techniques and systems should replace damaging ones, water abstraction from rivers should be regulated and limited to protect aquifers and avoid inter-farmer conflicts within each drainage basin. Other measures to mainstream in the south would be basins to capture rainwater and assist groundwater recharge, doubling-up as sinks for excess water in times of flood and stores/reservoirs in times of drought, eventually leading to the establishment of semi natural wetlands and wet-meadows on flood plains.

The wise use of water should be a guiding principle, e.g. targeting wasteful irrigation practices.

The mainstreaming of such measures would be an investment into creating a matrix of sustainable land use in the long-term.

7. What opportunities and difficulties do you see arising from a significant increase of the rural development budget and a reinforcement of strategic targeting? (optional)
(maximum 3000 characters)

We wish to see an **economic, social and environmental renaissance of rural areas**, in order to realise the full contribution that they can make to a prosperous and sustainable Union and to honour the EU's commitment to social, economic and territorial cohesion. Such a renaissance could make a major contribution to the goals of EU 2020. By addressing sustainability challenges and the delivery of public goods, it would do much to assure European taxpayers of getting value for money from the CAP. For this reason, we call for a **significant increase in the rural development budget**.

Rural development policies must reflect and build upon the high diversity in the character, resources and traditions of the EU's many different rural regions. It must draw upon the energies and resources of the EU, national and regional governments, local authorities and the private and civil sectors. We therefore urge that future policy should indeed provide **a reinforcement of strategic targeting**. The need is for mechanisms at EU, national, regional and sub-regional level which achieve true synergy and complementarity between major EU Funds, and which harness the resources of all sectors. The new Policy should make provision for :

- a. A common EU-level strategic framework for the Common Agriculture, Food and Rural Policy and the successors to the ERDF, Cohesion Fund, ESF and EFF.
- b. Regulations for these five Funds which are fully harmonised with each other; which explain clearly the intended complementarity between them; which are harmonised in procedural terms, so that governments and delivery agencies can minimise the difficulty for beneficiaries; and which enable the delivery of relevant measures by sub-regional partnerships operating across the full range of Funds.
- c. A requirement that Member States, or Regions in countries with federal systems, or groups of regions covering specific territories shall produce – for the next programming period – strategic frameworks which reflect the purposes of the common EU-level strategic framework, and which set a clear basis for active complementarity between the Operational Programmes related to the five EU Funds. Any strategic targeting should be the result of a bottom-up approach, the priorities set out at sub-national level being aggregated to create the set of priorities to be adopted at national level.
- d. A requirement also that member states, or where relevant regional authorities, shall – throughout their territories – promote the creation and support the activity of sub-regional or inter-regional partnerships in the task of preparing and implementing sub-regional or territorial development strategies, with powers to deliver all relevant measures within the Operational Programmes related to all five EU Funds, and specifically all measures within the scope of the proposed European Rural Fund, and with operational funds provided (in mainly rural sub-regions) through the Rural Fund or (elsewhere) through the Regional or Cohesion Funds

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? (optional)
(maximum 3000 characters)

We believe that a "no policy" scenario would have devastating social, economic and environmental consequences both for those regions where farming would be abandoned and for those regions of Europe where farmers would intensify production yet further in order to sustain their competitiveness. The number of farms, and the farm labour force, would be drastically reduced. Territorial balance would be totally destroyed. Migration from rural to urban areas would accelerate, with serious consequences for unemployment, urban crowding, public health and pressure on public services.

MONITORING AND EVALUATION

If you have relevant documents (graphs, charts,...) that you would like to attach to your contribution, you may upload it below the answer fields.

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? (optional)

(maximum 3000 characters)

When CAP payments were linked to production, control was assured via IACS, plus field survey, aerial photography and other means. Agri-environment schemes depended upon the creation of prescriptions related to, and field validation of, environmental features and management regimes. These methods are essentially continuing in the present SPS regime.

As the agenda moves more fully onto a wider interpretation of sustainability, including environmental services and other public goods, so these systems will need to be adapted to cope with this widening agenda. Difficulties of implementation must be anticipated, and reduced by timely and effective preparation. E.g. the production of a clear definitional basis for HNV farmlands would allow environmentally-targeted horizontal payments, preferably with 100% EU funding, with less difficulty and administrative cost than if they were variable per MS. Administrations should be offered guidance on efficient implementation in order to reduce "red tape" for both farmers and officials.

The benefit of having used an LPIS-GIS to control the CAP is that it can be used synergistically with other GIS applications, to ensure a territorial approach to sustainable land use – for example, use of Natura 2000 data layers, or Nitrate Vulnerable Zone data layers, with optional additional information such as maximum livestock density loads in sensitive areas, to enable better planning.

Exchange of best practice, encouraged by the JRC in collaboration with Commission audit services can achieve efficient and effective control. E.g. most MS already divide parcels in the LPIS-GIS into arable and grassland, which is used for checks on maintaining permanent pasture. The Commission's own audit results reveal how cross-compliance can be effective and efficient: those MS who have not invested in making sure procedures are smooth and efficient, or the necessary databases are compatible and inter-operable, are those which have to rely on complex solutions requiring many staff-hours and increased administrative complexity (eg. UK). This contrasts with other paying agencies (eg. some autonomous communities in Spain), where e.g. there is interoperability between the main IACS and LPIS system with the GIS-based NVZ and Natura 2000 data, livestock/veterinary registers (calculating optimum livestock density). These are available to inspectors via laptops; streamlined control questions accessed via drop-down menus can slash inspection preparation time, length of time needed for the actual inspection, and office time for processing results.

Experiences from certification systems (organic farming) can be used as practice examples to control e.g. crop rotation. Or a monitoring agency for agricultural products and food, for example, does not require new systems of data acquisition. Yet existing statistics only need to be adapted and better united. With such measures, there should not be significant increase in administrative burdens or costs.

10. What indicators would best express the progress towards achieving the objectives of the reform? (optional)
(maximum 3000 characters)

Farm-gate prices of farm products covering full costs of sustainable production, and reduced volatility in those prices

Gap between farm-gate prices and consumer prices

Levels of observance of standards of sustainable farming

Improved conservation and sustainable use of biodiversity, also within farming practices

Evolution of utilized agricultural area

Ecological health, and ecosystem services restored and maintained, on all farmland

Maintained biodiversity of High Nature Value farmlands

Reduced levels of emission of greenhouse gases on farms

Reduced levels of farm dependence on imported foodstuffs and other imports

Reduced levels of food waste

Sustained levels of employment in farming and agri-food enterprises + number of working adults per hectare

Levels of retirement and succession, and age structures, among farmers + number of newly established farmers

Gross Value Added, or economic multipliers, within local economies

Strength of telecommunications infrastructure in rural areas

Levels of provision of basic services of all kinds in rural areas

Demographic trends, particularly in areas that have been suffering out-migration of economically active people

Reduced levels of poverty

Avoidance of material harm to the character of the landscape of villages, small towns and their hinterland.

Conservation and enhancement of rural built heritage.

Local partnerships (measured by number or area covered by or number of rural inhabitants within them)

Reduced losses of excess nutrients, eutrophication events, algal blooms

Reduced (waste of) irrigation water and abstraction from rivers

Recharging aquifers

11. Are there factors or elements of uncertainty that could significantly influence the impact of the scenarios assessed? Which are they? What could be their influence? **(optional)**
(maximum 3000 characters)

- a. The absence of information on the budget, as a whole and regarding its distribution between the different support components, does not permit an impact assessment of the orientations proposed.
- b. The speed of recovery from the present **economic crisis**, particularly in the eurozone. Delays in the recovery could seriously constrain the willingness and ability of Member States to contribute own share to the measures described in the scenarios or in our answers above. Special attention should therefore be given to new co-financing rules, which would stimulate and enhance the shift towards sustainable practices, thus increasing EU co-financing in relation to good performance of member states. The economic crisis also impacts the wealth of consumers and their willingness to pay premium prices for the products they consume. The potential of quality schemes and environmental claims to generate added value is therefore uncertain.
- c. The evolution and outcome of World and bilateral **Trade talks**. These could either expose European farmers to, or protect them from, unfair competition or food dumping from third countries, who do not have to observe the same high labour, environmental or animal-welfare standards.
- d. **Climate change**. Rapid changes in climatic norms, or rapid increase in the incidence of climatic extremes (storms, floods, droughts, extreme cold or heat), which could disrupt farming, food markets, forests, ecosystems, infrastructure etc.

For other requests please feel free to contact us at :

agri-cap-towards2020@ec.europa.eu