

COMMITTEE ON AGRICULTURE AND RURAL DEVELOPMENT
THE CHAIR

D 201234 13.06.2018

Ms Cecilia Wikström
Chair of the Conference of Committee Chairs
ASP 08G201

IPOL-COM-AGRI D (2018) 23513

Subject: ENVI request for rule 54 on CAP strategic plan and CMO legislative proposals

Dear Chair,

I have taken note with deep concern of the two messages sent to the AGRI and CoordLeg Secretariats by the Head of the Secretariat of the ENVI Committee on 7 June 2018 laying down the claims of the ENVI Committee with respect to two of the three legislative proposals in the CAP reform package adopted by the Commission on 1 June 2018 - the proposal for a Regulation on CAP strategic plans (COM(2018)392 final) and the proposal for a Regulation on the Common organisation of markets in agricultural products (CMO) (COM(2018)394).

In these messages, the ENVI Committee requests to be granted associated committee status under Rule 54 with respect to both proposals with very extensive shared and exclusive competences.

The source of my concern is essentially twofold: These claims by the ENVI Committee raise very serious systemic issues related to the respective powers and responsibilities of standing committees in this Parliament and they appear to be totally disproportionate in view of directly relevant precedents.

On the systemic front, I would like to draw attention to three basic points which the argumentation developed by the ENVI Secretariat seems to conveniently ignore:

- Under Annex V (XIII)(1) of the Rules of Procedure, the AGRI Committee is responsible for *“the operation and development of the common agricultural policy”*. This is actually, by far, the main competence of the AGRI Committee and its very *“raison d’être”*.

- The two proposals in question are CAP instruments and essential parts of a CAP reform package. They are both based on Article 43(2) TFEU concerning the CAP - exclusively, in the case of the Strategic plans proposal, and in combination with other provisions related to the internal market (but not to environmental or health policies) in the case of the CMO proposal.
- All components of the CAP, whether laid down in the CAP Strategic Plans proposal, the CMO proposal or the Horizontal Provisions proposal (which is the third element in the new CAP reform package), are closely interlinked and form part of a global agricultural policy which pursues the triple objective of economic viability, environmental and climate performance and support to the socio-economic fabric of rural areas and is intended to fit inside a given financial envelope. For the sake of consistency, it is therefore difficult to envisage that some components could be treated separately from the others.

Under these circumstances and irrespective of the arguments developed by the ENVI Secretariat with respect to the objectives or content of certain provisions in these proposals, I would argue that the intrinsic nature of these proposals is totally incompatible with the very notion that other committees than AGRI could be given exclusive competence over entire chunks of the CAP, thus practically depriving this committee from its clear responsibility under Annex V of the Rules of Procedure:

In the case of the CAP strategic plans proposal, the ENVI argumentation is essentially based (through multiple quotes and examples) on the fact that - as was the case already with the so-called Direct Payments (1307/2013) and Rural Development (1305/2013) Regulations in the framework of the last CAP reform - a number of environmental objectives have been assigned to the income support provided to farmers and certain CAP payments have been made conditional upon the fulfilment of environmental criteria. While we are not denying that this is the case, we find it extremely difficult to accept that this could make the payments in question environmental rather than agricultural payments and that support to farmers under the CAP should henceforth be regarded as a kind of subset of the EU environmental policy.

The same kind of consideration applies to the ENVI claims related to the CMO proposal. The common organisation of markets has always been a key component of the CAP with the essential aim of helping farmers producing and selling quality food products, corresponding to consumers' expectations, and obtaining a good price for them. None of the aspects of the new proposal, which takes the form of an amending Regulation, mentioned in the message from the ENVI Secretariat actually justifies an involvement of the ENVI Committee. Thus, the provisions allowing new vine varieties for the production of wine in certain areas are intended to promote varieties better adapted to changing climatic conditions (not to combat climate change) for the sake of economic resilience. The possibility to produce innovative products such as de-alcoholised grapevine and partially de-alcoholised grapevine is intended to allow wine producers to meet a new market demand (not to pursue health policy objectives). The simplification of the GI registration system is intended to facilitate the registration of new GIs for the sake of quality and added value on the market. It relates to an important CAP instrument (Quality Schemes) and the fact that it covers foodstuffs and alcoholic beverages is not such as to justify the claims made by the ENVI Committee.

As far as precedents are concerned, reference should be made to the requests introduced by the ENVI Committee with respect to the corresponding proposals in the previous CAP reform package (for the period 2014-2020).

The new CAP Strategic Plans proposal now includes provisions related to both Pillar 1 and Pillar 2 of the CAP and thus corresponds to what is currently covered by the Direct Payments (1307/2013) and Rural Development (1305/2013) Regulations. The new CMO proposal essentially amends the current CMO Regulation (1308/2013) as well as the Quality Schemes Regulation (1151/2012).

With respect to both the proposal on Direct Payments and the proposal on Rural Development, the ENVI Committee had requested the application of "enhanced cooperation" in accordance with the former Rule 50 (the predecessor of "associated status" under the new Rule 54) but, in view of the core competence of the AGRI Committee to deal with a CAP reform, it eventually had to settle for the submission of "simple" opinions under the former Rule 49 with some additional elements of cooperation ("49+").

With respect to the CMO proposal and the Quality Schemes proposal, the ENVI Committee did not even bother to submit "simple" opinions.

In view of the above, I would like to reiterate the strong insistence of the AGRI Committee (which will probably not request any associated committee or other special status in relation to other MFF related programmes) that its core and exclusive competence to deal with all aspects of the new CAP reform package be respected by other committees, including the ENVI Committee.

As was the case in 2011-2012 we consider that this core and exclusive competence should rule out, as a matter of principle, any association of other committees to the legislative proposals in this package under Rule 54, with either exclusive or shared competences - since even shared competences would considerably complicate the already difficult and highly political issue of the calendar to handle the proposals in question and deprive the AGRI Committee of its freedom of manoeuvre in this respect.

While we remain prepared, in line with relevant precedents, to welcome an opinion on the CAP Strategic Plans proposals from the ENVI Committee with additional elements of cooperation ("Rule 53+"), we cannot possibly accommodate this Committee's new claims which we regard as both unjustified and disproportionate.

Yours sincerely,



Czesław Adam SIEKIERSKI

CC: Ms. Adina-Ioana VĂLEAN, Chair of the Committee on Environment, Public Health and Food Safety