



## ECVC Comments

### Proposal for a regulation on the Common Agricultural Policy post-2020 strategic plans

20th August 2018

#### General Comment

The European Commission refuses to direct agriculture towards sustainable and long-lasting agricultural models that ensure local, high-quality food, preserve the environment, boost the rural economy everywhere and guarantee a decent wage for all farmers and a European agricultural policy that meet society's expectations. The European Commission's solution is smart farming. The European Commission does not seem to have realised the seriousness of the challenges facing the planet in terms of the environment, climate change, food, social cohesion and employment, nor that agriculture must play a role and make a transition to sustainable, small-scale agroecological models and processes. To do this, we need to clearly define the model to be targeted, plan the measures that enable and encourage transition, and value the farms that produce in a sustainable way and employ small-scale agriculture practices.

#### Comment 1 – Recital 12

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>A smarter, modernised and more sustainable CAP needs to embrace research and innovation, in order to serve the multi-functionality of Union agriculture, forestry and food systems, investing in technological development and digitalisation, as well as improving the access to impartial, sound, relevant and new knowledge.</p>	<p>A smarter, modernised and more sustainable CAP needs to embrace research and innovation, in order to serve the multi-functionality of Union agriculture, forestry and food systems, investing in technological development and digitalisation, as well as improving the access to impartial, sound, relevant and new knowledge <b>and specifically taking into account farmers' knowledge and promoting the access to training programs and exchange from farmer to farmer.</b></p>

*Justification:* innovation must be considered in terms of participation in the agricultural sector, and according to the sector's development needs. We must use innovation to develop sustainable models and, under no circumstances, to promote macro-farms and integration systems that implement an agricultural model without farmers. Research must also be carried out alongside farmers which values their knowledge. This should be done through exchanges between farmers and participatory research.



## Comment 2 - Recital 24

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>Member States should set farm advisory services for the purpose of improving the sustainable management and overall performance of agricultural holdings and rural businesses, covering economic, environmental and social dimensions, and to identify the necessary improvements as regards all measures at farm level provided for in the CAP Strategic Plans. These farm advisory services should help farmers and other beneficiaries of CAP support to become more aware of the relationship between farm management and land management on the one hand, and certain standards, requirements and information, including environmental and climate ones, on the other hand. The list of the latter includes standards applying to or necessary for farmers and other CAP beneficiaries and set in the CAP Strategic Plan, as well as those stemming from the legislation on water, on the sustainable use of pesticides, as well as the initiatives to combat antimicrobial resistance and the management of risks. In order to enhance the quality and effectiveness of the advice, Member States should integrate advisors within the Agricultural Knowledge and Innovation Systems (AKIS), in order to be able to deliver up-to-date technological and scientific information developed by research and innovation.</p>	<p>Member States should set farm advisory services for the purpose of improving the sustainable management and overall performance of agricultural holdings and rural businesses, covering economic, environmental and social dimensions, and to identify the necessary improvements as regards all measures at farm level provided for in the CAP Strategic Plans. These farm advisory services should help farmers and other beneficiaries of CAP support to become more aware of the relationship between farm management and land management on the one hand, and certain standards, requirements and information, including environmental and climate ones, on the other hand. The list of the latter includes standards applying to or necessary for farmers and other CAP beneficiaries and set in the CAP Strategic Plan, as well as those stemming from the legislation on water, on the sustainable use of pesticides, as well as the initiatives to combat antimicrobial resistance, <b>agroecological practices</b> and the management of risks. In order to enhance the quality and effectiveness of the advice, Member States should integrate advisors within the Agricultural Knowledge and Innovation Systems (AKIS), in order to be able to deliver up-to-date technological and scientific information developed by research and innovation. <b>They will also guarantee a support to initiatives of knowledge exchange between farmers in order to include peasant knowledge.</b></p>

*Justification: in keeping with Comment 1.*

## Comment 3 - Article 4 – 1. a)

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. a) 'agricultural activity' shall be defined in a way that it includes both the production of</p>	<p>1. a) 'agricultural activity' shall be defined in a way that it includes both the production of</p>



<p>agricultural products listed in Annex I to the TFEU, including cotton and short rotation coppice, and maintenance of the agricultural area in a state which makes it suitable for grazing or cultivation, without preparatory action going beyond usual agricultural methods and machineries;</p>	<p>agricultural products listed in Annex I to the TFEU, including cotton and short rotation coppice, <del>and</del>. <b>Maintenance of the agricultural area in a state which makes it suitable for grazing or cultivation, without preparatory action going beyond usual agricultural methods and machineries, can be considered as an agricultural activity, for a given year, to the condition that it is part of a set of agricultural practices leading to an effective production.</b></p>
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*Justification:* ECVC believes that if the maintenance of agricultural areas is not part of an agricultural practice like coppicing, it should not be considered an agricultural activity.

**Comment 4 - Article 4 – 1. b) iii)**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>b) 'agricultural area' shall be defined in a way that it is composed of arable land, permanent crops and permanent grassland. The terms 'arable land', 'permanent crops' and 'permanent grassland' shall be further specified by Member States within the following framework:</p> <p>(i) 'arable land' shall be land cultivated for crop production or areas available for crop production but lying fallow, and include areas set aside in accordance with Articles 22, 23 and 24 of Council Regulation (EC) No 1257/1999 28 , with Article 39 of Council Regulation (EC) No 1698/2005 29 , with Article 28 of Regulation (EU) No 1305/2013 or with Article 65 of this Regulation;</p> <p>(ii) 'permanent crops' shall be non-rotational crops other than permanent grassland and permanent pasture that occupy the land for five years or more, which yield repeated harvests, including nurseries and short rotation coppice;</p> <p>(iii) 'permanent grassland and permanent pasture' (together referred to as 'permanent grassland') shall be land not included in the crop rotation of the holding for five years or more, used to grow grasses or other herbaceous forage naturally (self-seeded) or through cultivation (sown). It may include other species such as</p>	<p>b) 'agricultural area' shall be defined in a way that it is composed of arable land, permanent crops and permanent grassland. The terms 'arable land', 'permanent crops' and 'permanent grassland' shall be further specified by Member States within the following framework:</p> <p>(i) 'arable land' shall be land cultivated for crop production or areas available for crop production but lying fallow, and include areas set aside in accordance with Articles 22, 23 and 24 of Council Regulation (EC) No 1257/1999 28 , with Article 39 of Council Regulation (EC) No 1698/2005 29 , with Article 28 of Regulation (EU) No 1305/2013 or with Article 65 of this Regulation;</p> <p>(ii) 'permanent crops' shall be non-rotational crops other than permanent grassland and permanent pasture that occupy the land for five years or more, which yield repeated harvests, including nurseries and short rotation coppice;</p> <p>(iii) 'permanent grassland and permanent pasture' (together referred to as 'permanent grassland') shall be land not included in the crop rotation of the holding for five years or more, used to grow grasses or other herbaceous forage naturally (self-seeded) or through cultivation (sown). It may include other species such as</p>



<p>shrubs and/or trees which can be grazed or produce animal feed;</p>	<p>shrubs and/or trees which can be grazed or produce animal feed; , <b>and even represent the only vegetation. All woodland areas used by animals, without exception, as well as all resources from those woodland areas consumed by animals, must be included.</b></p>
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*Justification:* the European Commission should ensure that countries take into account all woodland areas used by animals, without exception, including the resources that come from these areas (fruits, etc.) that animals eat. The European Commission will need to give the Member States some flexibility to evaluate these areas, which are heterogeneous by definition.

**Comment 5 - Article 4 - 1. d)**

Commission's proposed text	ECVC amendment
<p>d) 'genuine farmers' shall be defined in a way to ensure that no support is granted to those whose agricultural activity forms only an insignificant part of their overall economic activities or whose principal business activity is not agricultural, while not precluding from support pluri-active farmers. The definition shall allow to determine which farmers are not considered genuine farmers, based on conditions such as income tests, labour inputs on the farm, company object and/or inclusion in registers.</p>	<p>d) 'genuine farmers' shall be defined in a way to ensure that no support is granted to those whose agricultural activity forms only an insignificant part of their overall economic activities or whose principal business activity is not agricultural, while not precluding from support pluri-active farmers; <b>in the case of small farms, as defined by the Member State, the definition of genuine farmer can be based on self-determination of the farmer, as long as his agricultural activities represent the majority of his income.</b> The definition shall allow to determine which farmers are not considered genuine farmers, based on conditions such as income tests, labour inputs on the farm, company object and/or inclusion in registers; <b>owners of factory farms, as defined by the Member State, are not considered as farmers but as industrials.</b></p>

*Justification:* ECVC believes that the owners of factory farms, or farms in the form of limited companies that occupy vast areas of land, should not be considered as genuine farmers. Rather, they should be considered as industrialists, who will not benefit from agricultural support. Small-scale farms should be specifically recognised as being employment providers and as having added value, and they should benefit from specific support measures. A person may be considered a small-scale farmer as soon as they have no other significant sources of income.



**Comment 6 - Article 4 – 1. e)**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>e) 'young farmer' shall be defined in a way that it includes:</p> <p>(i) a maximum age limit that may not exceed 40 years;</p> <p>(ii) the conditions for being 'head of the holding';</p> <p>(iii) the appropriate training and/or skills required.</p>	<p>e) 'young farmer' shall be defined in a way that it includes:</p> <p>(i) a maximum age limit that may not exceed 40 years;</p> <p>(ii) the conditions for being 'head of the holding';</p> <p>(iii) the appropriate training and/or skills required; ;</p> <p><b>iiii) Member States include new farmers, meeting the criteria defining young farmers, without taking into account the age.</b></p>

*Justification: new farmers may have been part of a different profession before they started working in agriculture and it is unfair to exclude them from receiving support to set themselves up. The 40-year criterion should not be imposed on Member States.*

**Comment 7 - Article 6 – 1.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. The achievement of the general objectives shall be pursued through the following specific objectives:</p> <p>(a) support viable farm income and resilience across the Union to enhance food security;</p> <p>(b) enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation;</p> <p>(c) improve the farmers' position in the value chain;</p> <p>(d) contribute to climate change mitigation and adaptation, as well as sustainable energy;</p> <p>(e) foster sustainable development and efficient management of natural resources such as water, soil and air;</p> <p>(f) contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes;</p> <p>(g) attract young farmers and facilitate business development in rural areas;</p> <p>(h) promote employment, growth, social inclusion and local development in rural areas,</p>	<p>1. The achievement of the general objectives shall be pursued through the following specific objectives:</p> <p>(a) support viable farm income and resilience across the Union to enhance food security;</p> <p>(b) enhance <b>market</b> orientation <b>towards local, national and european markets</b>, and increase <b>competitiveness farms viability</b>, including greater focus on research, technology and digitalisation; <b>including the social, economic and environmental innovation imputable to sustainable farming models;</b></p> <p>(c) improve the farmers' position in the value chain;</p> <p>(d) contribute to climate change mitigation and adaptation, as well as sustainable energy;</p> <p>(e) foster sustainable development and efficient management of natural resources such as water, soil and air;</p> <p>(f) contribute to the protection of biodiversity, enhance ecosystem services and preserve <b>and restore</b> habitats and landscapes;</p>



<p>including bio-economy and sustainable forestry;          (i) improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare.</p>	<p>(g) attract young farmers and facilitate business development in rural areas;          (h) promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry;          (i) improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare.</p>
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*Justification: ECVC welcomes the organisation of the proposals into nine structuring objectives, which are economic, environmental and social. It is essential to start from a good basis. In this respect, objective 2 is written very dangerously as it exclusively values the industrial agricultural model, which is based on competitiveness, exports, low prices, economies of scale, and farm expansion. Instead, we should be talking about viable, affordable agriculture on their markets (local markets, national, European and sometimes international markets). Innovation is presented as technological and digital innovation, overlooking all the social, economic and environmental innovation that small and medium-scale farmers carry out. They do this through processing products on their farms, promoting direct sales and local markets and building relationships with consumers. This is in addition to the innovation that agroecological agricultural models represent. Concerning objective 6: “conserving” is not enough, we must restore habitats and destroyed biodiversity.*

**Comment 8 - Article 11 – 1.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. Member States shall include in their CAP Strategic Plans a system of conditionality, under which an administrative penalty shall be imposed on beneficiaries receiving direct payments under Chapter II of this Title or the annual premia under Articles 65, 66 and 67 who do not comply with the statutory management requirements under Union law and the standards for good agricultural and environmental condition of land established in the CAP Strategic Plan, as listed in Annex III, relating to the following specific areas:            (a) the climate and the environment;            (b) public health, animal health and plant health;            (c) animal welfare.</p>	<p>1. Member States shall include in their CAP Strategic Plans a system of conditionality, under which an administrative penalty shall be imposed on beneficiaries receiving direct payments under Chapter II of this Title or the annual premia under Articles 65, 66 and 67 who do not comply with the statutory management requirements under Union law and the standards for good agricultural and environmental condition of land established in the CAP Strategic Plan, as listed in Annex III, relating to the following specific areas:            (a) the climate and the environment;            (b) public health, animal health and plant health;            (c) animal welfare.  <b>(d) farm workers and farmers’ rights.</b></p>





*Justification: ECVC demands the inclusion of social conditionality: the CAP must recognise the value of agricultural work and create respect for workers' rights and dignity regardless of their status (farmer, employee, seasonal worker or permanent worker). All support paid to farmers, agri-food businesses and producer organisations must be subject to compliance with a common set of requirements concerning the rights and the reception of workers (with reference to international labour conventions).*

**Comment 9 - Article 13-1.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
1. Member States shall include in the CAP Strategic Plan a system providing services for advising farmers and other beneficiaries of CAP support on land management and farm management ('farm advisory services').	1. Member States shall include in the CAP Strategic Plan a system providing services for advising farmers and other beneficiaries of CAP support on land management and farm management ('farm advisory services'). <b>Member States must establish in their CAP Strategic Plan an appropriate budget for the funding of these farm advisory services.</b>

*Justification: it is essential to improve the training and advice that farmers receive to meet the challenges that they come up against and the demands of European society. Training has an essential role to play in agricultural transition (adaptation to climate change, removal of pesticides, training in agronomy, etc.) Current instruments should be improved with training aimed at meeting objectives and achieving results. The advice should not create an additional cost for the farmers and there should be an adequate budget for it.*

**Comment 10 - Article 13-2.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
2. The farm advisory services shall cover economic, environmental and social dimensions and deliver up to date technological and scientific information developed by research and innovation. They shall be integrated within the interrelated services of farm advisors, researchers, farmer organisations and other relevant stakeholders that form the Agricultural Knowledge and Innovation Systems (AKIS).	2. The farm advisory services shall cover economic, environmental and social dimensions and deliver up to date technological and scientific information developed by research and innovation. They shall be integrated within the interrelated services of farm advisors, researchers, farmer organisations and other relevant stakeholders that form the Agricultural Knowledge and Innovation Systems (AKIS). <b>Programs of knowledge exchange from farmer to farmer also received the support of Member States, whether they take place within their national borders or as part of european or trans-border encounters.</b>



*Justification:* these exchanges between farmers from different countries or regions of the European Union should be included and welcomed. Research must also be carried out alongside farmers which values their knowledge. This should be done through exchanges between farmers and participatory research. Research must be oriented towards farm autonomy and not indebting them with expensive inputs and new expensive technologies, etc.

**Comment 11 - Article 13-4.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>4. The farm advisory services shall cover at least the following:</p> <p>(a) all requirements, conditions and management commitments applying to farmers and other beneficiaries set in the CAP Strategic Plan, including requirements and standards under conditionality and conditions for support schemes as well as information on financial instruments and business plans established under the CAP Strategic Plan;</p> <p>(b) the requirements as defined by Member States for implementing Directive 2000/60/EC, Directive 92/43/EEC, Directive 2009/147/EC, Directive 2008/50/EC, Directive (EU) 2016/2284, Regulation (EU) 2016/2031, Regulation (EU) 2016/429, Article 55 of Regulation (EC) No 1107/2009 of the European Parliament and of the Council 30 and Directive 2009/128/EC;</p> <p>(c) farm practices preventing the development of antimicrobial resistance as set out in the Communication "A European One Health Action Plan against Antimicrobial Resistance" ;</p> <p>(d) risk management as referred to in Article 70;</p> <p>(e) innovation support in particular for preparing and for implementing Operational Group projects of the European Innovation Partnership for agricultural productivity and sustainability as referred to in Article 114;</p> <p>(f) development of digital technologies in agriculture and rural areas as referred to in Article 102(b)</p>	<p>4. The farm advisory services shall cover at least the following:</p> <p>(a) all requirements, conditions and management commitments applying to farmers and other beneficiaries set in the CAP Strategic Plan, including requirements and standards under conditionality and conditions for support schemes as well as information on financial instruments and business plans established under the CAP Strategic Plan;</p> <p>(b) the requirements as defined by Member States for implementing Directive 2000/60/EC, Directive 92/43/EEC, Directive 2009/147/EC, Directive 2008/50/EC, Directive (EU) 2016/2284, Regulation (EU) 2016/2031, Regulation (EU) 2016/429, Article 55 of Regulation (EC) No 1107/2009 of the European Parliament and of the Council 30 and Directive 2009/128/EC;</p> <p>(c) farm practices preventing the development of antimicrobial resistance as set out in the Communication "A European One Health Action Plan against Antimicrobial Resistance" ;</p> <p>(d) risk management as referred to in Article 70;</p> <p>(e) innovation support in particular for preparing and for implementing Operational Group projects of the European Innovation Partnership for agricultural productivity and sustainability as referred to in Article 114;</p> <p>(f) development of digital technologies in agriculture and rural areas as referred to in Article 102(b)</p> <p><b>(g) support to sustainable agricultural practices such as agroecological practices.</b></p>





*Justification:* in this regard, it would be a good opportunity to implement advisory services adapted to small-scale agroecology and processes that work towards agroecology. The training and the exchange of knowledge between farmers should be part of the programmes.

#### Comment 12 - Article 13 - nouveau paragraphe

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
	<p><b>5. Member States organise the access to the farm advisory services to:</b></p> <p><b>1) guarantee the priority to new farmers;</b></p> <p><b>2) limit the access to big farms.</b></p>

*Justification:* priority should be given to new entrants and others who start working in agriculture and there should be the imposition of an economic criteria preventing the farm from continuing to benefit from this advice.

#### Comment 13 - Article 15-1.

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. Member States shall reduce the amount of direct payments to be granted to a farmer pursuant to this Chapter for a given calendar year exceeding EUR 60 000 as follows:</p> <p>(a) by at least 25 % for the tranche between EUR 60 000 and EUR 75 000;</p> <p>(b) by at least 50 % for the tranche between EUR 75 000 and EUR 90 000;</p> <p>(c) by at least 75 % for the tranche between EUR 90 000 and EUR 100 000;</p> <p>(d) by 100 % for the amount exceeding EUR 100 000.</p>	<p>1. Member States shall reduce the amount of direct payments to be granted to a farmer pursuant to this Chapter for a given calendar year exceeding EUR 60 000 as follows:</p> <p><b>(a) by at least 25 % for the tranche between EUR 60 000 and EUR 75 000;</b></p> <p><b>(b) by at least 50 % for the tranche between EUR 75 000 and EUR 90 000;</b></p> <p><b>(c) by at least 75 % for the tranche between EUR 90 000 and EUR 100 000;</b></p> <p><b>(d) by 100 % for the amount exceeding EUR 100 000 60 000.</b></p>

*Justification:* ECVC demands a maximum CAP support of EUR 60.000 per farm.

#### Comment 14 - Article 15-2

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>2. Before applying paragraph 1, Member States shall subtract from the amount of direct payments to be granted to a farmer pursuant to this Chapter in a given calendar year:</p> <p>(a) the salaries linked to an agricultural activity declared by the farmer, including taxes and</p>	<p>2. Before applying paragraph 1, Member States shall subtract from the amount of direct payments to be granted to a farmer pursuant to this Chapter in a given calendar year:</p> <p>(a) the salaries linked to an agricultural activity declared by the farmer, including taxes and</p>



social contributions related to employment; and (b) the equivalent cost of regular and unpaid labour linked to an agricultural activity practiced by persons working on the farm concerned who do not receive a salary, or who receive less remuneration than the amount normally paid for the services rendered, but are rewarded through the economic result of the farm business.	social contributions related to employment <b>with a limit of wages fixed by the Member State;</b> and (b) the equivalent cost of regular and unpaid labour linked to an agricultural activity practiced by persons working on the farm concerned who do not receive a salary, or who receive less remuneration than the amount normally paid for the services rendered, but are rewarded through the economic result of the farm business.
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*Justification:* ECVC believes that income and employment should be taken into account in all support allocations. On farms that have more than EUR 60 000 in support, the number of workers to be taken into consideration must be limited. If no maximum support limit is set per farm, the expansion of farms, agro-industrial models and macro-farms in the food production chain will be encouraged. Indeed, according to European Commission figures, less than 1% of European farms would be affected by this degressivity and capping. This clearly shows that, by not limiting the number of assets taken into account in the cap per farm, this measure only affects factory farms slightly, or has no effect at all.

#### Comment 15 - Article 25

Commission's proposed text	ECVC amendment
Member States may grant payments to small farmers as defined by Member States by way of a round sum, replacing direct payments under this Section and Section 3 of this Chapter. Member States shall design the corresponding intervention in the CAP Strategic Plan as optional for the farmers.	Member States <b>may shall</b> grant payments to small farmers as defined by Member States by way of a round sum, replacing direct payments under this Section and Section 3 of this Chapter, <b>set at a sufficient level to ensure a long term viability to those farms.</b> Member States shall design the corresponding intervention in the CAP Strategic Plan as optional for the farmers.

*Justification:* ECVC proposes to make the small farms measure mandatory at a level of support that is adequate enough to provide a genuine income support for many small-scale farmers.

#### Comment 16 - Article 29

Commission's proposed text	ECVC amendment
1. Member States may grant coupled income support to genuine farmers under the conditions set out in this Subsection and as further specified in their CAP Strategic Plans. 2. The Member States' interventions shall help	1. Member States <b>may shall</b> grant coupled income support to genuine farmers under the conditions set out in this Subsection and as further specified in their CAP Strategic Plans. 2. The Member States' interventions shall help



<p>the supported sectors and productions or specific types of farming therein listed in Article 30 addressing the difficulty or difficulties they undergo by improving their competitiveness, their sustainability or their quality.</p> <p>3. Coupled income support shall take the form of an annual payment per hectare or animal.</p>	<p>the supported sectors and productions or specific types of farming therein listed in Article 30 addressing the difficulty or difficulties they undergo by improving their competitiveness, their sustainability or their quality.</p> <p>3. Coupled income support shall take the form of an annual payment per hectare or animal, <b>with a capping fixed by Member States.</b></p>
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*Justification: ECVC supports direct coupled payments and is against reducing the budget allocated for this measure. There must be limits to this support/caps in terms of LU per active farmer and per farm.*

### Comment 17 - Article 30

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>Coupled income support may only be granted to the following sectors and productions or specific types of farming therein where these are important for economic, social or environmental reasons: cereals, oilseeds, protein crops, grain legumes, flax, hemp, rice, nuts, starch potato, milk and milk products, seeds, sheepmeat and goatmeat, beef and veal, olive oil, silkworms, dried fodder, hops, sugar beet, cane and chicory, fruit and vegetables, short rotation coppice and other non-food crops, excluding trees, used for the production of products that have the potential to substitute fossil materials.</p>	<p>Coupled income support may only be granted to the following sectors and productions or specific types of farming therein where these are important for economic, social or environmental reasons: cereals, oilseeds, protein crops, grain legumes, flax, hemp, rice, nuts, starch potato, milk and milk products, seeds, sheepmeat and goatmeat, beef and veal, olive oil, silkworms, dried fodder, hops, sugar beet, cane and chicory, fruit and vegetables, short rotation coppice <b>and other non-food crops, excluding trees, used for the production of products that have the potential to substitute fossil materials.</b></p>

*Justification: ECVC supports direct coupled payments and is against reducing the budget allocated for this measure. There must be limits to this support/caps in terms of LU per active farmer and per farm. Giving access to support for agofuels through coupled payments is an aberration. The CAP's priority must be to support sectors that are in difficulty in order to feed the European population.*

### Comment 18 - Article 64

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>The types of interventions under this Chapter shall be the following:</p> <p>(a) environmental, climate and other management commitments;</p> <p>(b) natural or other area-specific constraints;</p>	<p>The types of interventions under this Chapter shall be the following:</p> <p>(a) environmental, climate and other management commitments;</p> <p>(b) natural or other area-specific constraints;</p>



<p>(c) Area-specific disadvantages resulting from certain mandatory requirements;</p> <p>(d) investments;</p> <p>(e) installation of young farmers and rural business start-up;</p> <p>(f) risk management tools;</p> <p>(g) cooperation;</p> <p>(h) knowledge exchange and information.</p>	<p>(c) Area-specific disadvantages resulting from certain mandatory requirements;</p> <p>(d) investments;</p> <p>(e) installation of young farmers, <b>new farmers and women farmers</b> and rural business start-up <b>which revitalize rural areas</b>;</p> <p>(f) risk management tools;</p> <p>(g) cooperation;</p> <p>(h) knowledge exchange and information.</p>
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Justification: the chapter on rural development must take into account the necessity to include new farmers and women farmers.

**Comment 19 - Article 66 - 1.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. Member States may grant payments for natural or other area-specific constraints under the conditions set out in this Article and as further specified in their CAP Strategic Plans with the view of contributing to the achievement of the specific objectives set out in Article 6(1).</p>	<p>1. Member States <b>may shall</b> grant payments for natural or other area-specific constraints under the conditions set out in this Article and as further specified in their CAP Strategic Plans with the view of contributing to the achievement of the specific objectives set out in Article 6(1).</p>

Justification: in keeping with Comment 18.

**Comment 20 - Article 67 - 1.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. Member States may grant payments for area-specific disadvantages imposed by requirements resulting from the implementation of Directives 92/43/EEC and 2009/147/EC or Directive 2000/60/EC under the conditions set out in this Article and as further specified in their CAP Strategic Plans with the view of contributing to the achievement of the specific objectives set out in Article 6(1).</p>	<p>1. Member States <b>may shall</b> grant payments for area-specific disadvantages imposed by requirements resulting from the implementation of Directives 92/43/EEC and 2009/147/EC or Directive 2000/60/EC under the conditions set out in this Article and as further specified in their CAP Strategic Plans with the view of contributing to the achievement of the specific objectives set out in Article 6(1).</p>

Justification: in keeping with Comment 18.



**Comment 21 - Article 69 - 1.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
1. Member States may grant support for the installation of young farmers and rural business start-up under the conditions set out in this Article and as further specified in their CAP Strategic Plans with the view of contributing to the achievement of the specific objectives set out in Article 6.	1. Member States <del>may</del> <b>shall grant</b> support for the installation of young farmers, <b>new farmers and women farmers</b> and rural business start-up under the conditions set out in this Article and as further specified in their CAP Strategic Plans with the view of contributing to the achievement of the specific objectives set out in Article 6.

Justification: *in keeping with Comment 18.*

**Observation 22 - Article 69 – 2.**

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
2. Member States may only grant support under this type of interventions to help: (a) the installation of young farmers who fulfil the conditions included in the definition set out in point (e) of Article 4(1); (b) the start-up of rural business linked to agriculture and forestry or farm household income diversification; (c) the business start-up of non-agricultural activities in rural areas being part of local development strategies.	2. Member States <del>may only</del> <b>shall</b> grant support under this type of interventions to help: (a) the installation of young farmers <b>and new farmers</b> who fulfil the conditions included in the definition set out in point (e) of Article 4(1); <b>(b) the installation of women farmers;</b> <del>(b)</del> <b>(c)</b> the start-up of rural business linked to agriculture and forestry or farm household income diversification; <del>(c)</del> <b>(d)</b> the business start-up of non-agricultural activities in rural areas being part of local development strategies. <b>(e) promoting the insertion of young farmers, new farmers and women farmers in local markets through direct sale and local calls for tenders with the objective to contribute to the achievement of specific objectives mentioned in article 6.</b>

Justification: *the chapter on rural development must take into account the necessity to include new farmers and women farmers. Rural development measures must not only promote their installation but also their insertion in local markets and direct sale, in order to promote local and sustainable production.*



## Comment 23 - Article 70

<i>Commission's proposed text</i>	<i>ECVC amendment</i>
<p>1. Member States shall grant support for risk management tools under the conditions set out in this Article and as further specified in their CAP Strategic Plans.</p> <p>2. Member States shall grant support under this type of interventions in order to promote risk management tools, which help genuine farmers manage production and income risks related to their agricultural activity which are outside their control and which contribute to achieving the specific objectives set out in Article 6.</p> <p>3. Member States may grant in particular the following support:</p> <p>(a) financial contributions to premiums for insurance schemes;</p> <p>(b) financial contributions to mutual funds, including the administrative cost of setting up;</p> <p>4. Member States shall establish the following eligibility conditions:</p> <p>(a) the types and coverage of eligible insurance schemes and mutual funds;</p> <p>(b) the methodology for the calculation of losses and triggering factors for compensation;</p> <p>(c) the rules for the constitution and management of the mutual funds.</p> <p>5. Member States shall ensure that support is granted only for covering losses of at least 20% of the average annual production or income of the farmer in the preceding three-year period or a three-year average based on the preceding five-year period excluding the highest and lowest entry.</p> <p>6. Member States shall limit the support to the maximum rate of 70% of the eligible costs.</p> <p>7. Member States shall ensure that overcompensation as a result of the combination of the interventions under this Article with other public or private risk management schemes is avoided.</p>	<p>1. Member States shall grant support for risk management tools under the conditions set out in this Article and as further specified in their CAP Strategic Plans.</p> <p>2. Member States shall grant support under this type of interventions in order to promote risk management tools, which help genuine farmers manage production and income risks related to their agricultural activity which are outside their control and which contribute to achieving the specific objectives set out in Article 6.</p> <p><b>3. Member States may grant in particular the following support:</b></p> <p><b>(a) financial contributions to premiums for insurance schemes;</b></p> <p><b>(b) financial contributions to mutual funds, including the administrative cost of setting up;</b></p> <p><b>4. Member States shall establish the following eligibility conditions:</b></p> <p><b>(a) the types and coverage of eligible insurance schemes and mutual funds;</b></p> <p><b>(b) the methodology for the calculation of losses and triggering factors for compensation;</b></p> <p><b>(c) the rules for the constitution and management of the mutual funds.</b></p> <p><b>5. Member States shall ensure that support is granted only for covering losses of at least 20% of the average annual production or income of the farmer in the preceding three-year period or a three-year average based on the preceding five-year period excluding the highest and lowest entry.</b></p> <p><b>6. Member States shall limit the support to the maximum rate of 70% of the eligible costs.</b></p> <p><b>7. Member States shall ensure that overcompensation as a result of the combination of the interventions under this Article with other public or private risk management schemes is avoided.</b></p>





*Justification: risk management must be addressed through public policies. Private insurance is not an alternative and public authorities cannot finance insurance contributions. It is unacceptable to make it compulsory for Member States to financially support production and market risk insurance and/or income stabilisation insurance tools. The compulsory reduction of the insurance trigger threshold to 20% is unacceptable because this reduction will require a substantial budget. This budget will be drawn from rural development policy, which is not intended to finance insurance.*

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