



A review of stakeholders' views on CAP reform

What they say and what they have achieved

Henrike Klavert and Niels Keijzer

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Authors

Henrike Klavert and Niels Keijzer
European Centre for Development Policy Management (ECDPM)
Onze Lieve Vrouweplein 21
6211 HE Maastricht
The Netherlands

Overseas Development Institute
203 Blackfriars Road
London SE1 8NJ
United Kingdom

Disclaimer: The views presented in this paper are those of the author(s) and do not necessarily represent the views of ODI or our partners.

Tel: +44 (0)20 7922 0300
Fax: +44 (0)20 7922 0399
www.odi.org.uk

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Abbreviations

ACP	African, Caribbean and Pacific
ARC	Agricultural and Rural Convention
BMELV	German Federal Ministry of Food, Agriculture and Consumer Protection
CAP	Common Agricultural Policy
CELCAA	European Liaison Committee for the Agricultural and Agri-food Trade
CMO	Common Market Organisation
COCERAL	Grain and Feed Trade Committee of the EC
Copa-Cogeca	Committee of Professional Agricultural Organisations, General Committee for Agricultural Cooperation in the EU
DEFRA	UK Department for Environment, Food and Rural Affairs
EAFRD	European Agricultural Fund for Rural Development
EEB	European Environmental Bureau
EC	European Commission
ECPA	European Crop Protection Association
EFFAT	European Federation of Food, Agriculture and Tourism Trade Unions
EFMA	Fertilisers Europe
EPA	Economic Partnership Agreement
EU	European Union
Eucolait	European Association of Dairy Trade
FEFAC	European Feed Manufacturers Association
FTA	Free Trade Agreement
GHG	Greenhouse Gas
GMO	Genetically Modified Organism
ICTSD	International Centre for trade and Sustainable Development
IEEP	Institute for European Environmental Policy
MFF	Multi-annual Financial Framework
MFN	Most-favoured Nation
NGO	Non-governmental Organisation
PAN	Pesticide Action Network
PCD	Policy Coherence for Development
SAPS	Single Area Payment Scheme
SMR	Statutory Management Requirement
SPS	Single Payment Scheme
TRQ	Tariff-rated Quota
UK	United Kingdom
WTO	World Trade Organization

1 Introduction

1.1 Purpose and structure of this paper

This paper reviews the positions of various stakeholders on the reform of the Common Agricultural Policy (CAP) post-2013, examining their views on two global challenges that are addressed in this reform: food security and environmental public goods. The analysis can be used to inform the engagement of stakeholders concerned with the implications of the reform for global development during the next phase of the reform process.

In October 2010, the European Commission (EC) published a Communication to inform the institutional debate and prepare the ground for the legal proposals adopted a year later in October 2011 (EC, 2010a). This identified three challenges that the reform of the CAP should respond to: food security; environment and climate change; and territorial balance. In line with these challenges, this paper examines how various stakeholders try to influence how the CAP can enable the EU to tackle food security and the provision of environmental public goods. These two were chosen because they can be defined in various ways by different stakeholders, thus reflecting their values and interests in relation to what they believe the CAP should set out to do.

In terms of structure, Section 1.2 introduces the conceptual and methodological approach the paper takes. Section 2 introduces key features of the CAP reform and looks into the context for stakeholder involvement and the literature examining the effects of stakeholder influence on past CAP reforms, as well as the CAP decision-making process going forward. Section 3 reviews some stakeholders' views on the Multi-annual Financial Framework (MFF) and explains the next steps in the budgetary process. Sections 4 and 5 review the positions of several stakeholders on how the reformed CAP should respond to the challenges of food security and environmental public goods prior to and after the publishing of the EC reform proposals. Section 6 concludes.

1.2 Conceptual and methodological approach

This paper presents and analyses the interests and actions of different stakeholders in relation to the CAP prior to the publishing of reform proposals and after the proposals had been published.¹ In order to systematically analyse actors' positions in relation to the European Union (EU)'s MFF for the period 2014–2020 and the two global challenges, the authors analyse two types of documents: i) those prepared by the EC; and ii) those prepared by CAP stakeholders.

The paper defines the CAP reform process as the interface through which different stakeholders seek to advance their own perceptions as to what the CAP should aim to achieve and the extent to which it should be resourced to do so. As per the Ordinary Legislative Procedure defined by the Lisbon Treaty, this reform process can be defined as comprising two separate and distinct phases that seek to prescribe the 'rules of the game':

- 1 A first phase whereby the EC uses a systematic and relatively transparent process to develop its legislative proposal; and
- 2 A second phase whereby the Council and the Parliament aim to reach a consensus decision.

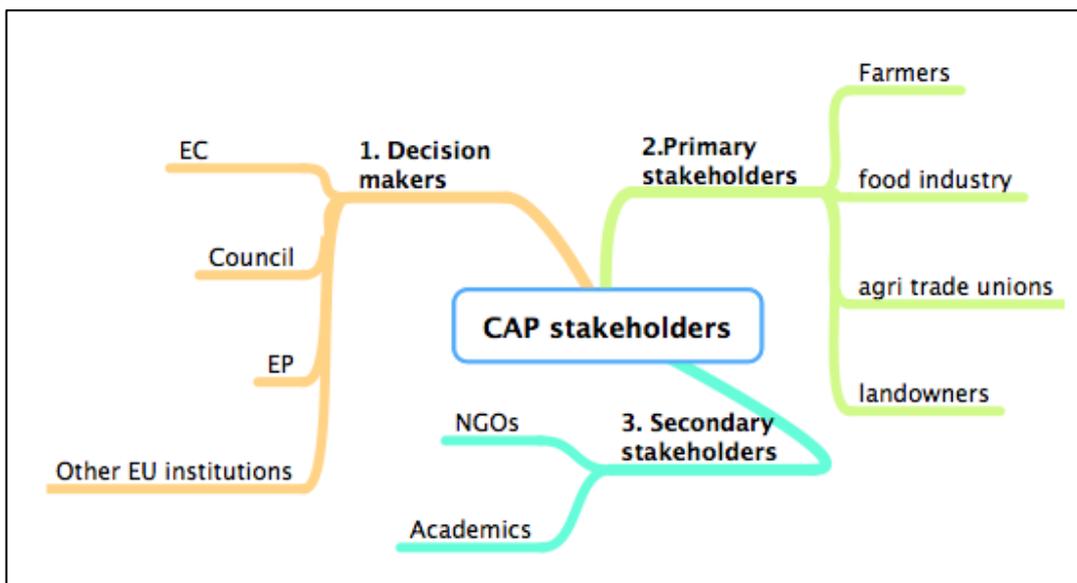
The review seeks to incorporate some elements of political economy analysis through an analysis of positions of differences among and within three groups of CAP stakeholders (see Figure 1).² The analysis does take inspiration from and looks into various dimensions of political economy analysis, and argues that such an analysis can improve understanding among stakeholders about their respective engagements and inform decision-making in relation to the CAP.

¹ For a more specific stakeholder analysis on proposals to change the system of direct payments, see European Parliament (2010).

² Political economy (PE) is the study of both politics and economics, and specifically the interactions between them. It focuses on power and resources, how they are distributed and contested in different country and sector contexts, and the resulting implications for development outcomes. PE analysis involves more than a review of institutional and governance arrangements: it also considers the underlying interests, incentives, rents/rent distribution, historical legacies, prior experiences with reforms, social trends, and how all of these factors effect or impede change' (World Bank, 2011).

For the purposes of this paper, CAP stakeholder groups influencing the CAP reform process are defined as i) the agenda setters and decision makers: the EU institutions and EU member states; ii) primary stakeholders: farmers; the food manufacturing, processing and wholesale industry; trade unions representing agricultural workers; and land owners; and iii) secondary stakeholders, which include environmental non-governmental organisations (NGOs), development NGOs and academics engaging in advocacy around the CAP. Consumer groups are further groups. For the second and third groups, organisations were chosen based on their participation in debates and consultations around the CAP (public consultations,³ Parliament hearings, CAP conferences in 2010–2011 etc.). As not all of the stakeholders' views could be included here, a focus was placed on so-called 'Eurogroups': organisations that represent organisations from all over Europe in Brussels, and that have shared opinions on the issues this paper discusses. For more information on the groups included, see Annex 1.

Figure 1: CAP stakeholders



The paper does not analyse developing countries' positions, as they do not have the same degree of 'direct access' to the policy process as the European stakeholders reviewed, even though their assessment of the CAP reform provides important feedback on the expected implications of the CAP for developing countries. The EU's legal commitment to promote Policy Coherence for Development (PCD), which seeks to represent the interests of the poorest developing countries within national and European policy processes, asks for specific efforts by EU institutions to make sure the concerns of developing countries are taken into account.⁴

Developing countries can inform the policymaking process directly, for example by submitting formal contributions to public consultations organised by the EC in preparation for new legislative proposals. Two separate rounds of consultations fed into the preparation of the legislative proposals: a public consultation to gather views and inputs from April to June 2010 (referred to as the 'public debate') and a public consultation for the impact assessment conducted by the EC between November 2010 and January 2011. Although no developing country stakeholders are referred to in the overview of contributions received, the references to food security in developing countries made in the conclusions of the synthesis report of the first consultation indicate that several European stakeholders represented developing country views or directly relayed their concerns (EC, 2010c). The overview of contributions to the January 2011 consultation for the impact assessment indicates that no contributions by developing countries were made.⁵

³ The individual submissions for the first stakeholder consultation prior to publishing the October 2010 Communication could not be reviewed because the EC did not publish them and made only a summary available.

⁴ Under Article 208 of the Treaty of Lisbon, the EU must take account of the objectives of development cooperation in policies that are likely to affect developing countries. This commitment, which has in fact existed since the 1992 Maastricht Treaty, is commonly referred to as PCD. The coherence of the EU's CAP with development objectives is disputed, however (Klavert et al., 2011).

⁵ See http://ec.europa.eu/agriculture/cap-post-2013/consultation/contributions_en.htm

The planned removal of the sugar quota is a concern for a number of developing countries. In October 2011, African, Caribbean and Pacific (ACP) sugar suppliers called for the CAP reform to ensure i) a stable and commercially attractive price with effective tariff protection enabling predictable and sustainable export earnings; ii) effective management of the sector for an orderly and balanced market to enable sufficient sugar to meet the demands of the EU market; iii) maintenance of a most-favoured nation (MFN) tariff and safeguard mechanism with automatic triggers and no further liberalisation under free trade agreements (FTAs) that may adversely affect rights and obligations guaranteed in economic partnership agreements (EPAs) with ACP states, as may arise from what recent sugar quotas have been granted some Central and South American countries; iv) continuation of priority of access for eligible ACP states, with scope for South Africa to be granted a priority tariff-rated quota (TRQ) when market conditions permit; and v) a long-term perspective with predictability for continued investment by ACP states to promote efficiency, diversification and environmental sustainability (Business Journal, 2011). At a meeting of the ACP Parliamentary Assembly in December 2011, representatives discussed the CAP reform and its impact on ACP countries, focusing on genetically modified organisms (GMOs), cotton, direct payments, transfer of agricultural technology and measures to protect ACP smallholders (Swazi Observer, 2011).

2 Post-2013 proposals and opportunities for stakeholder engagement

2.1 EC proposals for a CAP post-2013

The EC defined its three key aims for the CAP legislative proposals published on 12 October 2011 as i) addressing the food supply challenges of the 21st century; ii) enhancing the sustainable management of natural resources across the whole of the EU; and iii) strengthening territorial and social cohesion in EU rural areas. They evolved from the public debate that preceded the Communication and identified seven challenges: food security, competitiveness of agriculture, globalisation, environmental challenges, territorial balance, diversity and simplicity of the CAP.

These policy directions are to be implemented by means of four EU regulations, replacing those of the previous period: i) a regulation governing direct payments; ii) a regulation governing rural development payments; iii) a regulation revising the single Common Market Organisation (CMO) regulation; and iv) a horizontal regulation covering financing, management and monitoring of the CAP.

The EC's overarching goals for the first pillar are that it becomes greener and is distributed more equitably, and the proposed goals for the second pillar are that it is to be more focused on competitiveness and innovation, climate change and the environment. Table 1 summarises the proposed CAP measures. We describe the EC's proposals regarding the two challenges identified in this paper in more detail.

Table 1: Summary of proposed CAP changes

Direct payments	Market measures	Rural development
Convergence of direct payments across member states	Confirmation of the ending of milk quotas, of sugar quotas (with one-year delay) and of vine planting band	New rural development priorities to replace current axes
New basic payment to replace the Single Payment Scheme (SPS) and the Single Area Payment Scheme (SAPS)	Extension of the market disturbance clause to all commodities under the CMO	Better coordination with other EU funds
New 'green' component of direct payments	Measures to improve functioning of the food chain	New criteria to allocate Pillar 2 funds across member states
Greater targeting of beneficiaries	Measures to support quality production	Simplification of supported measures
New rules for coupled payments		Enhanced risk management toolkit
Changed cross-compliance rules		European Innovation Partnership
		Proposals on monitoring and evaluation

Source: Adapted from Matthews (2011e).

2.2 The context for interest group involvement

For a long time, European interest groups have been able to provide input regarding the CAP through so-called advisory groups. A 2004 EC Decision sets out the latest rules regarding these groups. They represent agricultural producers and agricultural cooperatives, agricultural and food manufacturing industries, agricultural products and foodstuffs trade, farm workers and workers in the food industry, consumers and environmentalists, and are selected by the EC. In total, there are 30 such groups, most of which focus on a specific commodity, but there is also one on the CAP as a whole. As an example, farmers and agricultural cooperatives have 30 seats in this group, traders 8, industry 8, workers 5, consumers 5, environmentalists 3 and others 2. In almost all other groups, farmers and agricultural cooperatives have by far the most seats. Representatives of Copa-Cogeca (the agricultural lobby: Committee of Professional Agricultural Organisations, General Committee for Agricultural Cooperation in the EU) often chair advisory groups, and minutes of these meetings are generally available on the EC website. Recently, the EC called for applications from NGOs interested in becoming observers in the International Aspects of Agriculture group. The advisory groups adopt opinions that do not bind the EC, but experts attending these meetings tend to have easy access to decision makers and thus a good deal of informal influence.

In addition to contributing to the advisory groups, stakeholders were able to provide inputs at various points leading up to the publishing of CAP reform proposals (see Table 2).

Table 2: Key moments for stakeholder influence on the CAP proposals

Date	Event
March 2010	European Parliament hearing, Committee on Agriculture and Rural Development
April–June 2010	Public debate (inviting written contributions)
July 2010	Conference on the public debate
September 2010	Leaked EC Communication
November 2010	Final EC Communication
November–January 2011	Consultation for impact assessment
April 2011	European Parliament hearing, Committee on Agriculture and Rural Development
September 2011	Leaked reform proposals
October 2011	Reform proposals
November 2011	European Parliament hearing, Committee on Agriculture and Rural Development
December 2011	CAP conference for researchers

A recent hearing in the European Parliament on the CAP in November 2011 stirred criticism. The Agricultural and Rural Convention (ARC), a joint initiative by Groupe de Bruges, Forum Synergies and the European School for Journalists, issued a press release stating that the hearing had been a kind of general assembly of Copa-Cogeca, as 32 out of 35 speakers were either affiliated or attached to the organisation (ARC, 2011).

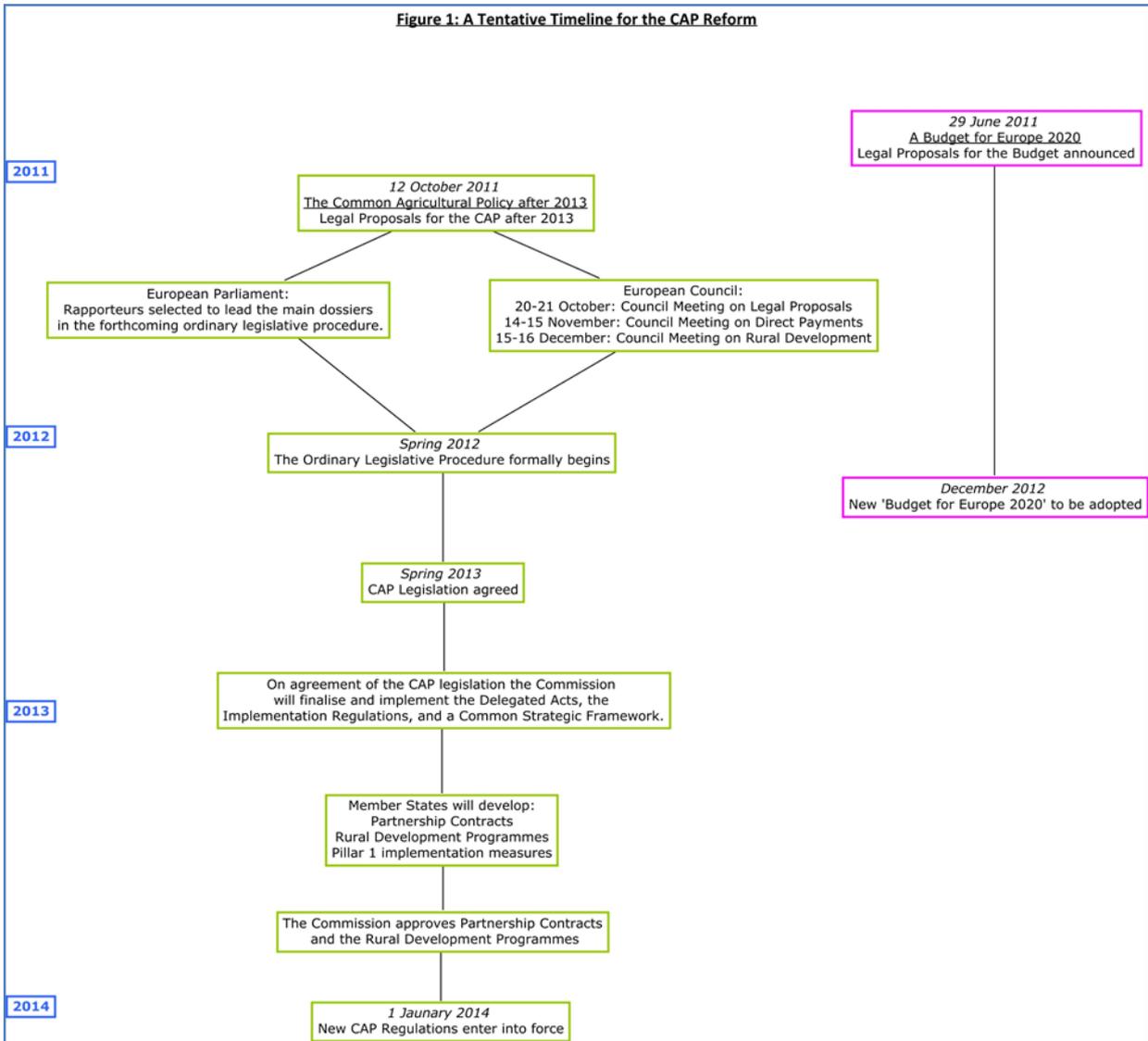
Given the large amount of money involved, funding a fairly small amount of the European population, the CAP has attracted scholarly attention regarding the influence of interest groups on policymaking. Most of this interest has focused on the farm lobby. Jonsson (2007) looks at the influence of farmer groups from 1986 to 2003 and finds that lobbying can explain variations in agricultural support to specific commodities. Andersen et al. (2007) specifically examine the 1992 reform and focus on Copa's influence (then still separate from Cogeca, and seen to be the most powerful lobby in Brussels). They find that Copa had few opportunities to influence the drafting of the reform and the EC relied on its own judgment. Kay (2000) looks at CAP reform from 1985 to 2000 and finds that EU-level interest groups did not have significant influence. In addition, his findings show that the influence of national farm groups on national governments in the CAP reform process is declining in big member states, and international trade negotiations and domestic business interests have become more influential. This paper makes an attempt to see where things stand in this reform and which stakeholders have been or can be influential at which stage of the reform.

2.3 The way forward

Negotiations on the next MFF (2014–2020), including the CAP budget, began in January 2012. These will have major implications for the CAP negotiations, which are unlikely to finish before the budget has been decided (see Section 3). Parliament, for the first time on par with the Council in this round of CAP reforms, has appointed rapporteurs for the four legislative proposals for the ordinary legislative procedure, which is likely to begin in spring 2012. How long the procedure will take under these new circumstances is guesswork,⁶ but the aim is to finish by the end of 2012. However, the presence of links with the EU budget negotiations suggest there could be delays. The new legislation has to be in place by 1 January 2014. The Institute for European Environmental Policy (IEEP) has developed a tentative timeline for the CAP reform (see Figure 2).

⁶ As referred to in the introduction of this paper, one key reason for this uncertainty is that following the entering into force of the Lisbon Treaty, this will be the first time that the reform of the CAP will be prepared and agreed through the Ordinary Legislative Procedure.

Figure 2: Tentative timeline for the CAP reform



Source: http://www.cap2020.ieep.eu/assets/2011/11/2/CAP_Reform_timeline_2.jpg

3 CAP budget proposals and stakeholder reactions

The CAP reform is subject to a tug-of-war among member states on issues such as the distribution of direct payments. Political sensitivity over the distribution of CAP funds is related to the large share of the EU budget the CAP takes up, which means that the total value of CAP-related funds to member states is one strong factor influencing whether an EU member state is a 'net contributor' or a 'net recipient' of EU funding. This relative status of EU member states continues to influence political debates strongly on the pros and cons of membership and will play a strong role in the reform of the CAP.⁷ In the current austerity climate, moreover, it seems that EU member states perceive the policy mostly as a tool to redistribute the EU budget among themselves, as opposed to a policy to advance agricultural development.

3.1 The EU's proposal for its next MFF

In June 2010, the EU adopted the Europe 2020 Strategy, focusing on smart, sustainable and inclusive growth. This aims to transform the EU into a knowledge-based, resource-efficient and low-carbon economy and to provide a sustainable response to the challenges facing the EU up to 2050. The Europe 2020 Strategy provides the policy framework for the 2014–2020 MFF.

The MFF sets annual maximum amounts (ceilings) for EU expenditure as a whole and for the main categories of expenditure (headings). The EC's budget proposal (EC, 2011e) consists of five headings: i) smart and inclusive growth (economic, social and territorial cohesion); ii) sustainable growth: natural resources (market-related expenditure and direct payments); iii) security and citizenship; iv) global Europe; and v) administration. The CAP is to be found under Heading 2. Table 3 compares the current budget with the proposed EU MFF, but it must be taken into consideration that the MFF 2007–2013 was presented in current prices and the new MFF is presented in constant 2011 prices.⁸ Thus, although it seems as if the EC proposes to increase the overall EU budget quite significantly (including the CAP), in real terms the increase is actually small.

Table 3: Comparison of current and future MFF – headings and amounts (€ billions)

MFF 2007–2013: headings	MFF 2007-2013: amounts/heading	Proposed MFF 2014–2020: headings	Proposed MFF 2014–2020: amounts/heading
Sustainable growth	382.139	Smart and inclusive growth	490.908
Preservation/management of natural resources	371.344	Sustainable growth	382.927
Citizenship, freedom, security and justice	10.770	Security and citizenship	18.535
EU as a global player	49.463	Global Europe	70.000
Administration	49.800	Administration	62.629
Compensation	800		
Total	864.316	Total	1.025.000

The section of the budget proposal on the CAP notes that 'not only will the agriculture budget be used to increase agricultural productivity, ensure a fair standard of living for the agricultural community, stabilise markets, assure the availability of supplies and ensure that they reach the consumer at reasonable prices, but it will also support the sustainable management of natural resources and climate action and support balanced territorial development throughout Europe' (EC, 2011e). Some priorities have shifted inside the CAP budget, as shown by proposals to allow some components to increase in relation to others. The comparison in Table 3 indicates that, should the EC's proposals be adopted in their current form, some aspects of the budget would increase more (e.g. security and citizenship by 70%, global Europe by 40%) than others (with the sustainable growth element remaining almost constant).

The key novelties in the proposal for the CAP budget affecting the challenges on the global level are that:

⁷ For example, on 12 October 2011, the Netherlands Minister for Agriculture argued that the proposed redistribution of CAP funds would mean that the Netherlands and Belgium would receive relatively larger cuts in payments compared with other member states.

⁸ For more analysis, see Matthews (2011g).

- In Pillar 1, **30% of direct payments** will be conditional on **greening** (beyond cross-compliance requirements), with the aim of making the agriculture sector more sustainable;
- Two **market measures** (traditionally in Pillar 1) have been created **outside the MFF** to allow for more flexibility and quick action:⁹
 - An **emergency reserve** for crises in the agriculture sector, like severe market disturbances, disease outbreaks etc.
 - **The European Globalisation Fund** opened up to farmers who have lost their jobs owing to changing global trade patterns, helping them find another job as rapidly as possible;
- The funding for **research and innovation** on food security, the bio-economy and sustainable agriculture will be part of the Common Strategic framework for Research and Innovation (Horizon 2020) under heading 1.¹⁰

One key conclusion to draw from this is that, if one is to monitor and understand the effects of the future reformed CAP on global challenges, it is not sufficient to focus only on heading 2 (Pillars 1 and 2) alone. Other budgetary elements, particularly flexibility provisions and research spending, should also be taken into account.

Pillar 1 continues to fund direct payments and market measures and is proposed to make up 72.8% of the budget, which means income support (albeit under certain conditions) continues to make up the core of the CAP budget. Pillar 2 is to continue to deliver specific environmental public goods (a proposed 23.2% of the budget). What these allocations mean for the two challenges examined in this paper is discussed in more detail in Sections 4 and 5. Matthews (2011d) calculates that, although there is a decline of 7% in the CAP budget compared with the last budget (it makes up 36% of the entire EU budget), if one adds the extra funding mechanisms proposed outside the CAP, the numbers stay more or less the same.

3.2 Stakeholder reactions to the CAP budget proposals

Among member states, views on the preferred size of the CAP budget diverge. Traditional 'anti-CAP' countries (UK, Sweden, Denmark) continue to argue for a reduction, with the UK being most vocal on this issue in this round of CAP reforms. In its contribution to the consultation on the CAP impact assessment, the UK noted that 'the CAP cannot be immune to the hard choices being made elsewhere in the EU. There must therefore be a very substantial cut to the CAP Budget during the next MFF. [...] The UK believes that farmers do not want to rely on subsidies in perpetuity: Expenditure in a significantly smaller CAP. The budget should tackle the key objectives of encouraging a competitive, sustainable EU agriculture sector, reducing reliance on subsidies and focusing resources on the provision of environmental public goods' (DEFRA, 2011a). After the Commission CAP budget proposals were published, the UK regretted that it did not foresee a substantial reduction in CAP funds. The Czech Republic is also in favour of a reduction of the CAP budget.

Table 4: Selected member states' views on the size of the CAP budget

UK	Sweden	Poland	Spain	Czech Republic	Germany	Netherlands	France	Ireland	Hungary
Cut	Cut	Maintain	Maintain or increase	Cut	Maintain	Maintain	Maintain or increase	Maintain	Maintain

On the other side of the spectrum, France and Spain have called for a CAP budget that is at least maintained at the current level. They therefore welcomed the EC proposals, although according to France this

⁹ In 2008, the EC proposed to fund the €1 billion Food Facility for developing countries from the CAP budget, arguing that the same reasons leading to the need for the facility (high food prices) also led to lower agriculture market expenditure under heading 2, leaving a significant unallocated margin under the ceiling of heading 2 (European Parliament, 2008a). It tried to argue that funding could be drawn directly from heading 2 because of the agricultural nature of the facility and a revision of the MFF would not be necessary. While this was a rather revolutionary proposal (using leftover CAP money for developing countries), both the Council and the Parliament turned it down, describing it as inappropriate and confusing. In the end, the facility was financed through the Emergency Aid Reserve, the Instrument of Flexibility and a redeployment from the Instrument for Stability (European Parliament, 2008b). The inter-institutional agreement between the Council, the EC and the Parliament had to be revised to increase the fund in the Emergency Aid Reserve, which required complex and time-consuming negotiations. All parties concluded that the budgetary framework is seriously limited when there is need to adjust to unexpected events, and the procedure for revising the MFF is too long (EC, 2011g). As a result of these limitations, the EC has placed five funds outside the MFF.

¹⁰ For more in-depth analysis on the future CAP budget, see European Parliament (2011a).

constitutes the 'absolute minimum' (Ministère de l'Agriculture, 2011b; 2012). Ireland, Hungary, Poland and several other member states have called for the budget to be maintained at the current level (Ministère de l'Agriculture, 2011a). The Netherlands, one of the countries in between the two poles, has called for the budget to be maintained at the current level without taking account of inflation (Rijksoverheid, 2011).

The majority of primary stakeholders are in favour of keeping the budget at its current level. Among secondary stakeholders, while there have been calls for a reduction of the CAP budget, in this round of reforms most organisations put a focus on how to spend the CAP budget better, rather than how to reduce it.

3.3 The way forward on the EU budget 2014–2020

EU member states will try to secure agreement on the MFF by the end of 2012. The Danish presidency will put the MFF on the agenda of each General Affairs Council meeting until the end of June. While the meeting in January discussed the MFF in general, future meetings will discuss individual headings. As of May, negotiations are planned to be carried out through a 'negotiating box', a draft structure of the conclusions of the European Council, setting out the main issues and options and reflecting the outcome of the orientation debates held in the General Affairs Council. At the technical level, the Friends of the Presidency working party continues work on the future budget with a view to providing input to the presidency for the elaboration of the negotiation box (Council of the EU, 2012).

Sections 4 and 5 look at stakeholders' views on the two global issues included in this reform: food security and environmental public goods.

4 Stakeholder views on (global) food security

4.1 Primary stakeholders

A majority of primary stakeholders prefer the CAP to address **food security in Europe** alone. Many of them argue that the risk of food insecurity in Europe (which they define as becoming dependent on food imports) is a justification for maintaining subsidies. According to the European Crop Protection Association (ECPA, 2010) and Fertilisers Europe (EFMA, 2010) Europe is vulnerable to food insecurity because it imports more food than it exports. The European Feed Manufacturers Association (FEFAC, 2010) notes that the CAP should secure safe food supply to EU consumers as a matter of priority over any other destination, although a competitive food and feed chain should contribute to increasing global food demand. EFMA calls for greater EU food self-reliance through the CAP. The European Association of Dairy Trade (Eucolait, 2010) argues that market intervention tools should not only be established as a safety net but also be used to establish increased food security and to stabilise markets. Eucolait calls for an 'external vision' of the CAP on export refunds and import tariffs, arguing that, under certain conditions, export refunds and import still have a useful role to play, as a temporary reduction of tariffs could facilitate market stabilisation.

Fears of European food insecurity have also led agricultural trade unions to the conclusion that Europe should aim for **food sovereignty** and European agriculture should produce for the European population only (EFFAT, 2011). In this view, producers and consumers lose from globalisation, which endangers the future of European farmers. The European association representing the cereal, rice, feedstuffs, oilseeds, olive oil, other oils and fats and agro-supply trade (COCERAL), on the other hand, calls for **recoupling of aid** to production to address European food security (COCERAL, 2011). The CAP should also support capitalising export market potential, ensuring a level playing field for both domestic production and trade.

The European Liaison Committee for the Agricultural and Agri-food Trade (CELCAA), on the other hand, argues that **sustainable food production can only be solved globally** and, given that the EU does not have a comparative advantage in producing certain materials, imports should not be restricted for a series of products for which a domestic production strategy would be more costly. CELCAA also argues that the EU's remaining export subsidies should be kept as long as there is no global agreement (CELCAA, 2010).

In response to the CAP legislative proposals, Copa-Cogeca, the European farmers and agri-cooperatives association argues that putting more emphasis on profitability and productivity of EU agriculture is essential 'if there is going to be enough food to feed the world's growing population at a price which people can afford' ((Copa-Cogeca, 2011e). FoodDrinkEurope (2011) has also called for the CAP to more explicitly stimulate productivity and growth in both pillars, while protecting EU productive potential and safeguarding natural resources.

4.2 Secondary stakeholders

According to the environmental NGO BirdLife (2011), European food security involved environmental security because only more environmentally sustainable agriculture can ensure long-term food security in Europe. However, BirdLife (2009) has also said that the EU should not isolate itself from the world market but rather devise policies that aim to increase the environmental and social sustainability of both home-grown and imported food.

NGOs that oppose globalisation share the views of the trade union mentioned above, that the interests of farmers and consumers worldwide are best served through complete **self-sufficiency** (La Via Campesina, 2010). In their view, the CAP should stop stimulating surpluses (grains, meat, dairy products), reduce dependency on feedstuff imports, end dumping exports, abolish export subsidies independently of the World Trade Organization (WTO), introduce provisions against import surges in the Global South and establish a complaint mechanism against food dumping, land grabbing or human rights violations. According to these NGOs, the CAP should pursue food self-sufficiency not only in Europe but also abroad (Transnational Institute et al., 2011).

Many academics refute **the threat to food security in Europe**, both those involved in lobbying on the CAP (Zahrnt, 2011) and those not (Blandford et. al, 2010). Their research concludes that the EU is not dangerously dependent on food imports. According to Zahrnt (2009), recent volatility in agricultural markets

did not have serious effects on EU production capacity and the EU's volume of agricultural production was at its second highest level ever in 2009. The EU's deficit on its agricultural trade balance has not grown.

A declaration on the CAP signed by 80 agricultural economists from all over the EU notes that the EU should promote global food security through an **open trading system**, support for **agricultural productivity in developing countries**, **climate change mitigation** and the **preservation of its own sustainable production capacity**.¹¹ To enhance productivity, more public investment in research and development should be undertaken. Blandford et al. and Zahrnt suggest the EU should invest in the agriculture and food system infrastructure and in agricultural research in developing countries, rather than funding production in Europe where land and water are scarce, wages are high and there are many environmental problems. According to Bouet and Laborde (2008), Europe should address domestic and global food security through diversification of its suppliers rather than a costly CAP.

Responding to the reform proposals, Matthews (2011e) says that, should the legislative proposals be adopted, they are likely to slightly decrease the EU's share of global agricultural production. However, the future production of EU farmers will depend on market conditions, thus if prices remain high EU farmers can be expected to produce more. The slight decrease in production should not lead to the conclusion that maintaining and increasing production should be carried out through distortionary public support, but rather through greater innovation leading to higher productivity (ibid.).

4.3 Decision makers

The EU Council and Parliament have referred to the need to address food security on various occasions. The Council stated in 2010 that 'maintaining the capacity of European farming to contribute significantly to food security in a sustainable way is seen as vitally important' (Council of the EU, 2010a). In 2011, the Parliament argued that that 'food security remains the central challenge for agriculture, not only in Europe but also globally' and 'the most favourable way of ensuring food security is by maintaining a stable, competitive agricultural sector; [...] a strong CAP is central to this' (European Parliament, 2011b).

In its November 2010 Communication (EC, 2010a) on the CAP, the EC argues that there is a need for a reform to respond to new challenges, first and foremost 'to address rising concerns regarding both EU and global food security'. In the remaining text, the EC notes that the CAP is expected to 'preserve the food production potential [...] so as to guarantee long-term food security for European citizens and to contribute to growing world food demand'. Also, it raises concerns around European food security: 'Europe's capacity to deliver food [...] cannot be taken for granted'. The impact assessment prepared for the CAP proposals mentions that 'it is essential that the EU agriculture and food industries contribute to global food security by remaining important suppliers of high quality and safe agricultural and food products in a growing world market' (EC, 2011g).

¹¹ This declaration is found here: <http://www.reformthecap.eu/posts/declaration-on-cap-reform>

Box 1: EC legislative proposals on food security

The EC has made several proposals on addressing food security. Given that it sees maintaining production as the key contribution to global food security, **direct payments** (with the primary aim of maintaining production) seem to be viewed as an important measure to address food security.

In addition, to address volatility, under Pillar 1, member states can use a **fraction of their national ceiling to couple payments** to products adversely affected by continuing disturbances in the market. In the dairy sector, the EC proposes strengthening **farmers' position in the food chain** by allowing the possibility for written contracts¹² and allowing collective bargaining over the milk price (Matthews, 2011b). The issue of the remaining **export subsidies** in place is not addressed by the EC proposals.

Under Pillar 2, the EC proposes an **enhanced risk management toolkit**, assisting farmers in addressing risks like animal and plant insurance, crop premiums, etc. and setting up mutual funds to compensate farmers for losses such as outbreaks of animal diseases. The risk management tool also covers an income stabilisation tool in the form of a mutual fund to address severe drops in income (exceeding 30% of average annual income).

In addition, three funding mechanisms (described in Annex 2) outside the CAP budget should address issues to do with food security, namely, the **emergency reserve and the Globalisation Fund as well as the Horizon 2020 framework** under heading 1 which, among other things, will fund research on food security, the bio-economy and sustainable agriculture.

The CAP proposals also speak of a **European Innovation Partnership** on agricultural productivity and sustainability to be created under Pillar 2as part of the flagship initiative 'innovation union' of the Europe 2020 Strategy.

In response to the EC's reform proposals, at their first debate in October 2011, most member states criticised the EC's greening proposals. Reporting on the debate by the International Centre for Trade and Sustainable Development (ICTSD, 2011) indicates that there were comments on the level of ambition of the overall package, on administrative burdens and on a possible mandatory greening component (see Section 4). The UK noted that the proposals needed to go further in order to deal with the twin challenges of international food security and protecting wildlife and biodiversity (DEFRA, 2011b). Germany agreed with the general direction of the proposals and with the goal to increase the environmental contributions of agriculture, but doubted the practicability of the proposals and that they would lead to a real added value for the environment (BMELV, 2011a). Member states do not seem to have reacted specifically on what is proposed in terms of food security, although the German Minister for Agriculture expressed doubts as to whether the environmental contributions would operate 'in harmony with the objectives of food security and energy resources'. Other ministers expressed fear that new environmental conditions would reduce European agriculture's productivity and increase its dependency on imports. The reactions thus clearly reflect how member states generally use 'food security' interchangeably with 'European food security' in a way that largely leaves the issue of sustainable management of its natural resources out of the equation (ICTSD, 2011).

¹² The proposal still leaves it up to member states whether to require written contracts in the dairy sector. However, unlike the rules for written contracts in other sectors, the regulation is specific on what milk contracts should contain.

4.4 Comparative analysis of stakeholder positions on food security

In summary, EU institutions' response to food security (read: European food self sufficiency) seems to focus on keeping everything as it is by prioritising maintaining production through direct payments. All institutions seem to be of the opinion that direct payments contribute to food security because they are the EU's main instrument to maintain European production. This is refuted by the Scenar 2020-II study, which finds that removing the CAP's direct payments would reduce overall agri-production in the EU by no more than 0.25% in 2010, in comparison with the reference scenario (Tangermann, 2011). EC proposals concretely focused on food security so far focus on emergency situations; links to the role of trade policy in managing global food security are not made. In the area of development cooperation, the EC in 2010 drew up a common framework on food security (EC, 2010b), which was endorsed by the Council. The Communication on the issue notes that future reforms of the CAP will continue to take global food security objectives into account but the EC is not exactly explicit on how it will do so, beyond providing development cooperation and maintaining EU production.

The review shows that the type of arguments put forward by primary stakeholders found their way into EC proposals from the beginning of this reform. It appears that food security as a term to describe Europe's situation has been taken over from this group of stakeholders as a new label for an old justification: Europe's agriculture is not viable without the CAP and its direct payments.

Table 5: How to address food security?

	Position	Argument
Primary stakeholders	<ul style="list-style-type: none"> • Prioritise European needs • Emphasise profitability/production/growth • Make market intervention a permanent tool to stabilise markets • Become self-reliant 	Europe risks becoming dependent on food imports. Europe should make a contribution to feeding the world.
Secondary stakeholders		
NGOs	<ul style="list-style-type: none"> • Promote environmentally sustainable agriculture • Pursue self-sufficiency 	Only environmentally sustainable agriculture can ensure long-term (EU) food security. Consumers and producers lose from globalisation.
Researchers	<ul style="list-style-type: none"> • Promote an open trading system • Support agricultural productivity/food system infrastructure in developing countries • Preserve production capacity through research and development, not public support • Diversify suppliers 	There is no evidence of threats to European food security.
Decision-makers	<ul style="list-style-type: none"> • Maintain European capacity in a sustainable way • Create stable competitive sector through CAP • Contribute to global demand by remaining supplier of high quality agricultural and food products 	Only the CAP can preserve food production potential to guarantee long-term food security. Maintaining European production through direct payments will make a contribution to global food security.

5 Stakeholder views on environmental public goods

Given the scarcity of land, water and energy and the threat posed by climate change, environmental concerns have come to the forefront of the CAP agenda, at least rhetorically. However, similar to the CAP's response to food security, stakeholders use varying definitions and conceptions of what an environmentally sustainable CAP could look like. Some stakeholders favour a definition based on whether agriculture and its impacts on land, water and energy are environmentally sustainable 'inside Europe'; others favour a policy that is explicitly informed by and seeks to reduce EU agriculture's environmental footprint outside Europe.

5.1 Environmental public goods – what are they?

In the current CAP debate, the decision to address Europe's environmental problems through the CAP has been justified based mainly on the fact that farmers are providing '**public goods**' which are non-excludable and non-rival and which have no market value and which they therefore have the right to be compensated for. A joint letter by Commissioners Ciolos, Potocnik and Hedegaard in March 2011 stated that 'agriculture must be a viable and competitive sector to deliver environmental public goods' (IEEP, 2011a: 9). However, different parties tend to provide their own definition of the term. For example, Copa-Cogeca has described maintaining farm activities and keeping farm income stable as public goods (IEEP, 2011a).

Generally, public goods should be non-rival and non-exclusive. A study for the European Parliament (IEEP, 2011a) summarises the principal public goods associated with agriculture:

- Environmental, notably farmland biodiversity, water quality and availability, soil functionality, air quality, climate stability (reducing greenhouse gas (GHG) emissions and increasing carbon storage), resilience to flooding and fire;
- Culturally valued agricultural landscapes;
- Rural vitality (the social, economic and cultural viability and vigour of rural societies);
- Farm animal welfare; and
- Food security (particularly the capacity to produce food sustainably in the future).

Beyond the environmental community, some studies have questioned the public goods argument as a good enough justification for CAP subsidies, because it may be confused with anything in the interest of more than one group. Matthews calls the term 'elastic', as it raises questions on where the threshold can be drawn (Matthews, 2010). He further questions why animal welfare is a public good and warns that, by putting so much emphasis on the need to compensate farmers for providing public goods, the 'polluter pays' principle may be forgotten.

5.2 Primary stakeholders

Several primary stakeholders (EFFAT, 2011; EFMA, 2010) recognise that the European taxpayer may not be willing to continue supporting European farmers if farming is not environmentally sustainable. The food and drink industry also recognises the urgency: 'the application of environmentally sustainable and resource-efficient agricultural practices should be a core element of any future agricultural policy' (FoodDrinkEurope, 2010). Similar to on food security, they do not make (public) proposals on how exactly this should be done.

Copa-Cogeca (2011d) has made its own proposals, which it believes can bring about green growth without reducing agricultural productivity in the EU. The group proposes three new mechanisms for green growth: a focus on i) resource efficiency, particularly of nutrients¹³ and water;¹⁴ ii) carbon sequestration in agricultural

¹³ Through precision farming, leguminous crop planting, use of new plant varieties with better nitrogen use/more disease resistance, use of controlled-release nitrogen fertilisers, better manure/sludge management, more use of agricultural by-products.

¹⁴ Through, for example, efficient irrigation (collective management, drip/sprinkler irrigation, monitoring of water need, use of cleaned waste water), retention of rainwater on fields/in ponds, efficient use of water for submerged crops (rice), controlled drainage, etc.

soil and biomass;¹⁵ and iii) a reduction in GHG emissions.¹⁶ It emphasises that the measures should be voluntary rather than mandatory and that the CAP should provide real incentives for farmers to take up agri-environmental measures rather than just being compensated for costs or income foregone, as at present. In terms of the external effects of greening the CAP, Copa-Cogeca has raised the concern that the CAP should not impose costly regulations on EU farmers that reduce EU production and outsource it to other parts of the world (Copa-Cogeca, 2011a; 2011b).

On biofuels, Copa-Cogeca (2011c) argues that, since not all arable land in the EU is farmed, biofuels can be produced in a sustainable way in the EU. There are no substantive ideas on how the competition for land between biofuels and food production could be mastered without harming the environment.

Box 2: EC CAP legislative proposals in relation to the environment

The EC has emphasised that 'greening' will be one of the priorities of this CAP reform since it published the November 2010 Communication:

- In its proposals on the CAP, it became clear that the EC wants to introduce an additional annual mandatory greening payment (30% of the national ceiling) in exchange for agricultural practices beneficial to the climate and the environment: crop diversification (three different crops simultaneously), maintenance of permanent pastures and ecological focus areas of at least 7% of farmland.
- Cross-compliance regulations are now found in the horizontal regulation, and the currently separate lists of statutory management requirements (SMRs) and standards of good agricultural and environmental land are to be combined.
- The Water Framework Directive has been added to the SMRs. According to the EC, the agriculture sector will shift significantly in a more sustainable direction.
- Under Pillar 2, member states have to spend a minimum of 25% of the total contribution from the European Agricultural Fund for Rural Development (EAFRD) to each rural development programme on climate change mitigation and adaptation and land management through the agri-environment-climate, organic farming and payments to areas facing natural or other specific constraints measures. This last point was added to the regulation after the proposals were leaked in early September 2011.

BirdLife (2011) calculates that the proposed greening measures will mean an increase from €5 billion currently spent on agri-environmental measures to €15 billion post-2013.

In response to the EC's reform proposals, Copa-Cogeca has argued that 'it does not make sense to require every single farm to stop producing on a certain percentage of their land (ecological set-aside) when world food demand is set to rise' (Copa-Cogeca, 2011e). In its view, this proposal is against the principles of the EU 2020 Strategy. It argues that the CAP proposals are not sufficiently focused on improving economic performance and overcoming the environmental constraints that burden farmers; solutions have to be win-win for the environment and growth and farmers should be able to choose measures most appropriate for them. Similarly, EFMA argues that ecological focus areas are not the way forward. In its view, fertilisers help farmers increase productivity, meaning that less land will need to be used without an across-the board decision (EFMA, 2011).

5.3 Secondary stakeholders

Numerous environmental groups have called for the CAP reform to be centred primarily on environmental issues. A group of 80 agricultural economists have also called for sustainable land use to become the key objective of the CAP. This includes biodiversity protection, climate change mitigation and responsible water management.¹⁷

While green payments were already envisaged in the EC Communication, only the reform proposals made clear that they would be mandatory for all farms under Pillar 1. In this respect, environmental NGOs can be seen to have been successful in lobbying for their cause. However, they are not satisfied with the contents of the EC greening proposal.

¹⁵ Through green cover crops, under-sown catch crops, low-protein livestock feeding and/or use of feed additives, on- and/or off-farm biogas production using agricultural residues/manure, etc.

¹⁶ Through soil and grassland management practices including no tillage/reduced tillage, retention of grassland and grass cover, agri-forestry and orchards/vineyards/olive trees, perennial energy crops, buffer strips.

¹⁷ <http://www.reformthecap.eu/declaration>

Since the proposals on greening of the CAP were leaked, BirdLife (2011), the NGO active in the reform process, supported by various other environmental NGOs, has largely condemned them. Although it welcomes the mandatory 30% greening component of Pillar 1, it argues that the proposed measures are not fit for purpose. In its view, the proposal for crop diversity is too unambitious, the proposed Ecological Focus Area requirement is too small (grassland-based livestock farms and organic farms are exempt from the requirement), farms in Natura 2000 areas are not appropriately supported and proposals for permanent grassland protection fail to target support to the most environmental valuable areas (they include intensively managed grassland, failing to prioritise pastures of most environmental value). They also miss measures on soil cover and nutrient balance. BirdLife wants payments to be coupled to the types of farming (e.g. High Nature Value farming, which is particularly vulnerable) rather than coupling support to specific farming sectors. In addition, it feels that the national envelopes under Pillar 1 are no longer available for environmentally beneficial farming systems/practices.

Pesticide Action Network Europe (PAN-Europe 2011) argues that crop rotation on the same field increases farm diversity, benefits wildlife and reduces pesticide dependency, benefits soil fertility and reduces fertiliser use, reducing GHG emissions. It proposes encouraging farmers to grow more protein animal feeds as part of the rotation, which would reduce Europe's dependency on imported soy, which causes deforestation and GHG emissions in South America.

The European Environmental Bureau (EEB, 2011) welcomes the proposed ecological focus areas but judges the proposals overall as failing to justify CAP spending. As the EEB notes, environmental NGOs have defended the CAP but on the condition that farmers significantly improve the way they farm, for which they do not see the appropriate measures in the proposals. It even argues that the proposal goes back on previous reforms by reintroducing the option for coupled supports for cereals (e.g. maize, which requires many chemical inputs) and by allowing a reverse shift from the second to the first pillar.

IEEP criticises that the new green payments under Pillar 1 have to be applicable in all parts of the EU and paid annually, but that there is hope that making environmental management compulsory should lead to some improvements in soil, air and water quality, particularly in more intensively farmed regions. IEEP welcomes the new cross-compliance standards, including the maintenance of soil organic matter, protecting wetlands and carbon-rich soils.

With regard to Pillar 2, Matthews (2011c) points out that, although a specific priority to promote the transition to a low-carbon agriculture and food economy, including fostering carbon sequestration, has been introduced, this has entailed no new measure to specifically address this priority.

IEEP welcomes the 25% earmarking of Pillar 2 for issues related to land management and the fight against climate change but deplores the decline in real terms of the Pillar 2 budget as well as the possibility of shifting 10% of Pillar 1 funding to Pillar 2.

On the link between greening and agricultural production, environmental NGOs argue that there may be schemes that do not have to limit production, but many analysts predict productivity loss through greening and agri-environmental schemes (Matthews, 2011a; PBL, 2011c). Matthews (2011a) notes that this owes to the requirement to maintain permanent pasture at current levels (thus farmers cannot plant more arable crops if world prices remain high), the environmental focus area rate and the crop diversification requirement.

5.4 Decision makers

The EU institutions have various views on how to consider the CAP in light of managing environmental threats. The Council (Council of the EU, 2011a) has committed to ensuring that the CAP is 'part of the solution' on climate change and contributes to low-carbon economic growth and cost-effective climate change mitigation and adaptation.

The European Parliament notes that 'improved natural resource protection and management is a central element in sustainable farming, which justifies, within the framework of the new challenges and objectives of the EU 2020 Strategy, additional incentives to encourage farmers to adopt environmentally sound practices that go beyond the baseline requirements of Cross-Compliance and would complement the already existing agri-environmental programmes' (European Parliament, 2011b). The Parliament calls for a closer link between direct payments and natural resource protection. Its Resolution rejects a new mandatory additional payment system and further proposes a priority catalogue of area-based and/or farm-level measures, whereas any recipient farmer would have to implement a certain number of greening measures. This might include support for low-carbon emissions and measures to limit or capture GHG emissions, support for low

energy consumption and energy efficiency, buffer strips, field margins, presence of hedges, permanent pastures, precision farming techniques, crop rotation and crop diversity and feed efficiency plans (ibid.).

In the Resolution, the Parliament also calls for the reformed CAP to include targets for the use of sustainable energy, and shares its conviction that the agriculture sector could use 40% renewable fuels by 2020 and be fossil-free by 2030. Yet two paragraphs later, the Parliament argues that 'rational European policies such as cheaper diesel for agricultural use and excise tax exemptions for power and fuel produced for agricultural purposes, particularly for electrically powered irrigation pumps, could help European farmers to produce more and supply both the domestic and export markets in agricultural products' (European Parliament, 2011b). However, the Opinions of several of the Parliament's committees refer to the use of fuels and CO₂ emissions in EU agriculture, with the Committee on Industry, Research and Energy stressing 'the agricultural sector's role in reducing CO₂ emissions by producing next-generation biofuels that do not compete with food production and by absorption of CO₂ by cultivated crops/plants or directly by the soil'.¹⁸ However, none of the Opinions address any link or trade-off between the promotion of biofuel production and food security in Europe or elsewhere. The Development Committee does argue that food should be seen as separate and more important compared with other commodities (including biofuels), by explicitly acknowledging that 'food is not merely a commodity but access to food is fundamental to human existence'.

In a first debate on the EC's legislative proposals in the Council in October 2011, most member states criticised the greening proposals. A majority believed that the 30% greening component was too high, and many also criticised the 7% ecological set-aside. France felt the proposals were not fit to meet the challenges facing European agriculture, and together with Spain expressed reticence regarding the 30% and 7% (Ministère de l'Agriculture, 2012). Some (like the Netherlands) welcomed greening proposals but, since one size does not fit all, argued for a menu to choose from for member states rather than an EU-wide measure. The Netherlands welcomed the 30% mark but felt the current greening proposals would not be effective enough in increasing biodiversity, and would rather add bureaucratic burdens. The Netherlands also questioned the proposed 7% mark and found that the EC's definition of greening was too limited and missed investment in sustainable and innovative production methods (Ministry of Economic Affairs, Agriculture and Innovation of the Netherlands, 2011d). The UK argued that the 7% ecological set-aside was not a good idea in times of increasing demand and that the EU would have to produce more rather than less food. Slovakia and France argued that while third country competitors were increasing their support for agriculture the EU should not be reducing it. Spain argued that the greening proposals were reducing the EU's competitiveness and productiveness and called for more coupled support (NFU Online, 2011). The Irish Minister said he had 'related concerns about the proposal to assign 30 per cent of the Direct Payment to a greening component, which will hasten the movement to flat rates of payment' (Department of Agriculture, Food and the Marine, 2011).

During the second debate in the Council on the issue in November 2011, several member states again questioned elements of the proposed greening of direct payments proposal, such as the share of national envelopes and splitting up agricultural land to form ecologically focused areas.

The biggest blow to environmental groups came in December 2011, when the Council on Environment refused to agree to the target¹⁹ and goals²⁰ for agriculture included in the EC's biodiversity strategy, which would have implications for the CAP. This may be seen as a victory for the agricultural lobby, as Cop-

¹⁸ All opinions can be found here: <http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&reference=A7-2011-0202&language=EN#title2>

¹⁹ Target 3a: by 2020, to maximise areas under agriculture across grasslands, arable land and permanent crops that are covered by biodiversity-related measures under the CAP so as to ensure the conservation of biodiversity and to bring about a measurable improvement in the conservation status of species and habitats that depend on or are affected by agriculture and in the provision of ecosystem services as compared with the EU2010 Baseline, thus contributing to enhance sustainable management.

²⁰ Action 8a: enhance direct payments for environmental public goods in the EU CAP: CAP direct payments will reward the delivery of environmental public goods that go beyond cross-compliance (e.g. permanent pasture, green cover, crop rotation, ecological set-aside, Natura 2000). 8b: improve and simplify the Good Agricultural and Environmental Conditions cross-compliance standards and consider including the Water Framework Directive within the scope of cross-compliance once the Directive has been implemented and the operational obligations for farmers have been identified in order to improve the state of aquatic ecosystems in rural areas. Action 9: better target rural development to biodiversity conservation: integrate quantified biodiversity targets into rural development strategies and programmes, tailoring action to regional and local needs; establish mechanisms to facilitate collaboration among farmers and foresters to achieve continuity of landscape features, protection of genetic resources and other cooperation mechanisms to protect biodiversity. Action 10: conserve Europe's agricultural genetic diversity. Encourage the uptake of agri-environmental measures to support genetic diversity in agriculture and explore the scope for developing a strategy for the conservation of genetic diversity.

Cogeca argued against mandatory greening measures from the start. However, as Matthews (2011f) argues, member states may genuinely doubt the greening proposals the EC has put on the table, which environmental NGOs have also called a 'greenwash'.

5.5 Comparative analysis of stakeholder positions on environmental public goods

The different stakeholders' positions and views as to how the future CAP should respond to this global challenge can be summarised as follows (see Table 6):

- 1 Among decision makers, the European Parliament, in its resolution on the CAP, has put forward concrete ideas on how to address environmental threats. In terms of goals, the Parliament and the EC agree, but the Parliament is against mandatory greening as proposed by the EC. Here, the Parliament's position differs from the environmental NGOs, who have welcomed the EC's proposal.
- 2 Among primary stakeholders, the farmers' lobby has been most vocal and explicit on how to green (through measures inducing growth) and has emphasised that there should be more incentives in the system for farmers to adopt agri-environmental measures, rather than just compensating them for lost profits.
- 3 Although welcoming the idea of strict greening measures, environmental NGOs have argued that the EC's concrete proposals are too lenient and will not lead to substantial benefits to the environment.
- 4 Academics argue that the proposed greening measures may increase biodiversity and will also limit production within the EU and will leave room for other players. Depending on the commodity, this may be developing countries. In terms of sustainability, the EU should take due care not to outsource its environmental problems to others.
- 5 Overall, according to those concerned with the environment, the CAP has a role to play in addressing environmental concerns, but the current proposals put forward by the EC are seen to justify direct payments rather than to address the fundamental concerns of the environmental community. While stakeholders expected some environmental profit out of the 30% greening component, they call for much more targeted measures to justify €15 billion of taxpayers' money.

This review shows that, while environmental groups have been successful in introducing the issue of environmental public goods into the CAP debate and have been willing to support the EC in promoting a strong CAP as long as it is environmentally friendly, they have not been successful in introducing the issues they have felt important into the reform proposals. While primary stakeholders and particularly Copa-Cogeca have been dissatisfied with the greening proposals put forward by the EC, they seem to have been more successful in getting member states as well as the Parliament on their side to argue for voluntary, more incentive-based greening measures.

Table 6: Comparing positions on how to address environmental public goods

	Position	Argument
Primary stakeholders	<ul style="list-style-type: none"> ● Focus on green growth that does not reduce EU production ● Create incentives for farmers, voluntary measures ● All measures have to be win-win for environment and growth ● Remaining EU arable land can be used for biofuels. 	<p>The CAP should not impose costly regulations onto EU farmers that reduce EU production and outsource it to other parts of the world. Not all arable land in the EU is farmed; biofuels can be produced in a sustainable way in the EU.</p> <p>Ecological set-aside works against productivity and does not make sense.</p>
Secondary stakeholders	<ul style="list-style-type: none"> ● Introduce mandatory greening ● Modify cross-compliance ● Increase % of ecological focus areas ● Allow a 10% shift from Pillar 1 to Pillar 2 only (not the other way around) ● Provide support to farming type (i.e. High Nature value) rather than farming sector ● Rotate crops on the same field 	<p>The greening component under Pillar 1 is to be welcomed but the measures proposed by the EC are not fit for purpose.</p>
Decision makers	<ul style="list-style-type: none"> ● Create incentives for farmers to adopt environmentally sound practices beyond cross-compliance ● Closer link between direct payments and natural resources ● Modify cross-compliance ● Earmark 25% of Pillar 2 expenditure for climate change and land management 	<p>European natural resources need to be protected to ensure sustainable farming.</p>

6 Conclusions

We analyse food security and environmental public goods which we suggest are two of the key challenges of this CAP reform. Based on an analysis of the EC's proposals and stakeholder engagement, this review concludes that they have largely been used by many stakeholders to keep the CAP as it is.

Based on an analysis of the views put forward by key stakeholders in the public debate and consultation in 2010 and 2011 that informed the EC's legislative proposals published in October 2011, this paper concludes that primary stakeholders and key decision makers in particular maintain that the CAP is an internal EU policy. As a result, the legislative proposals as published do not explicitly acknowledge the external dimension of the CAP, neither do they put forward objectives for what the CAP should seek to achieve beyond the EU's borders. However, during the preparation of the legislative proposals, there have been some opportunities for developing country stakeholders to present their views and concerns, either directly or indirectly through European stakeholders.

Secondary stakeholders have emphasised that the CAP should no longer be seen as a purely internal policy having been subject to external jurisdiction since at least Uruguay Round, and note that European agriculture is part of a global system and not immune to price volatility in the food and energy markets, and actually affects other markets. The increasing scarcity of water, land and energy, if not properly managed, could lead to competition for resources, on top of the effects climate change (e.g. droughts, flooding, soil degradation) are expected to have. Analysis of stakeholders' views in relation to food security and environmental public goods, however, indicates that other powerful stakeholders ignore the global 'integration' of European agriculture:

- 1 Although the term '**food security**' has been introduced, the global implications of this term have generally been ignored. Within the CAP debate, this introduction signifies a fear that the EU could become dependent on food imports if CAP payments are reduced and direct payments abolished. Researchers arguing against spreading this argument have not been successful in undermining the political interests associated with it. On food security, the ideas of the EC seem strongly influenced by primary stakeholders.
- 2 On **environmental public goods**, environmental groups have been successful in bringing their cause to the forefront of CAP debates, and the EC is pushing for the attribution of major funds to environmental causes. The EC's legislative proposals are not in line with those of the environmental groups, however, and they are likely to be watered down significantly in the coming year, as primary stakeholders (particularly the agricultural lobby), member states and the European Parliament are critical of mandatory greening. It appears environmental groups have failed in terms of taking their lobbying far enough to have their greening ideas included in the EC proposals. Failure to adopt agricultural targets within the biodiversity strategy shows that member states are still not willing to make real environmental concessions, although all of them say they are in favour of greening.

As this paper has shown, it remains difficult to trace the exact steps of interest groups in forming the CAP proposals. From this limited review, it appears that, similar to what previous studies have found, interest groups have had very limited influence on the drafting process of the reform proposals, but they may have a much better chance during the ordinary legislative procedure involving member states and the Parliament. This means that there are still many opportunities for stakeholders concerned with the CAP's impact on global development and its implications for low-income countries to influence the direction of the reforms that will be agreed to.

A related finding is that the advisory structures put in place to inform the implementation of the CAP are rather biased towards the group of primary stakeholders, and therefore other stakeholders can also seek to influence actual implementation of the CAP (including pushing for monitoring implications on global development) by seeking either observer or formal membership of one or more of the advisory groups in Brussels. Investing in improving the 'representativeness' of these advisory groups can be an opportunity to help EU decision makers take account of the implications of key EU agricultural policy considerations for developing countries.

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Annex I: Eurogroups included in this paper's analysis

Name	Description	Representation	Operation
BirdLife	Partnership of conservation organisations that strives to conserve birds, their habitats and global biodiversity	BirdLife partners operate in over 100 countries and territories worldwide	
CELCAA	Founded by European product-specific trade associations involved in retail and wholesale of agricultural and agri-food products	Members: Eucolait, COCERAL, UECEBV, SACAR, GAFTA EU, etc.	
COCERAL	Voice representing the European cereals, rice, feedstuffs, oilseeds, olive oil, oils and fats and agro-supply trade	Composed of national trade organisations; where this does not exist, individual companies are admitted as members; members in most of the 27 EU member countries	
Copa-Cogeca	<ul style="list-style-type: none"> Among the biggest and most active interest organisations in Brussels Recognised as the organisation speaking on behalf of the EU agricultural sector as a whole 	<ul style="list-style-type: none"> Copa: 60 organisations from the EU Cogeca: 35 EU agricultural cooperative organisations Represent 30 million farmers and around 40,000 cooperatives 	<ul style="list-style-type: none"> Regularly meet the Commissioner for Agriculture and Rural Development Meet the president-in-office of the Agricultural Council before every Council meeting Regular contact between Copa experts and those of the EC Contact at national level between Copa's member organisations and national ministers or their staff Regular contact with members of the Committee on Agriculture and Rural Development and the political groups Representatives often chair the EC's Advisory Groups
ECPA	Ambassador of the crop protection industry in Europe	Members include all major companies and national associations across Europe (Bayer CropScience, BASF, etc.)	
EEB	Largest coalition of grassroots environmental organisations	140 environmental NGOs (EU and beyond)	Policy officers are in almost constant dialogue with the European institutions (EC, Parliament and Council) and strive to improve or protect environment laws in Europe
EFFAT	Defends the interests of more than 2.6 million members with the European institutions, European industrial federations and enterprise management	120 national trade unions from 35 European countries	
Eucolait	Representative organisation of the European dairy trade	More than 500 companies active in EU and international dairy trade are members of Eucolait	Regularly in contact with EC, Council and Parliament as well as with national representatives in Brussels, in order to promote the interests of dairy trade and offer its expertise on market issues
EFMA	Promotes the role of mineral fertilisers in European agriculture and horticulture	15 corporate members (GrowHow etc.)	
FEFAC	Spokesman of the European Compound Feed Industry at the level of the European institutions	21 national associations in 20 EU member states	
FoodDrinkEurope	Food industry trade association with mission to facilitate development of an environment in which all European food and drink	Food companies (Kellogg's, Nestlé, Heineken, Coca-Cola etc.)	

Name	Description	Representation	Operation
	companies, whatever their size, can meet the needs of consumers and society, while competing effectively for sustainable growth		
La Via Campesina	International movement which defends small-scale sustainable agriculture as a way to promote social justice and dignity and strongly opposes corporate-driven agriculture and transnational companies that are destroying people and nature	150 local and national organisations in 70 countries	
PAN-Europe	Committed to bringing about a substantial reduction in pesticide use throughout Europe	Network of over 600 NGOs, institutions and individuals in over 60 countries	

Note: Researchers who are contributing to the thinking on the CAP reform on the websites www.capreform.eu and www.reformthecap.eu are also included in the analysis, in addition to these groups.