

Ms. Margot Wallström  
Commissioner for the Environment  
The European Commission  
Rue de la Loi 200  
B-1049 Brussels  
Belgium

Amersfoort/Den Haag, 28 October 2003

### **Implementation CAP-reform**

Dear Commissioner Wallström

On behalf of the Working Group on Agriculture of the European Environmental Advisory Councils (EEAC) I would like to express our appreciation of the part that both you and Commissioner Fischler played in the move towards an integration of environmental objectives in the Common Agricultural Policy. During 2005 we hope that the new Commissioners will continue your work towards a sustainable European agriculture. We intend to address the new Commissioners early in 2005 on the importance of a further shift towards a sustainable rural policy.

As EEAC we have – on a number of occasions – showed our concern regarding the slow pace of the shift towards a more sustainable rural development policy. On 12<sup>th</sup> December 2002 the EEAC addressed you about the mid-term review and the importance of integrating environmental concerns into agricultural policy. The EEAC had previously endorsed a “Statement on Sustainable Agricultural Policy for Europe” in which our vision of the European Model of Agriculture was explored in detail. In particular we supported the principal of decoupling, the proposals for compulsory modulation and the strengthening of pillar 2 (A further copy of this statement and our background report is enclosed in this letter).

However following the Luxembourg agreement we now wish to express our concerns regarding the implementation of the CAP-reforms at the national level. The new Horizontal Regulation provides each Member States with room to make their own choices on a number of crucial issues, in particular the degree of and timing of decoupling, use of national envelopes and regionalisation. The EEAC Working Group on Agriculture welcomes the flexibility to formulate solutions at the local level, but unless this is done within a common framework of policy and accountability there could be some unintended consequences.

In particular, we would like to express our concerns and aspirations on some specific issues:

- We would like to signal the need to assess the environmental, as well as the social and economic consequences, of the various national approaches to the implementation of the CAP-reforms. The European Commission needs to take a lead in ensuring this happens.
- As national advisory bodies, we will ask our national governments to make proper use of both modulation and the new national envelopes to meet environmental goals. In particular we hope that the forthcoming Salzburg Conference generates renewed enthusiasm across Europe for the further strengthening of pillar 2 once the current round of the RDPs come to an end in 2006.

- We will also advise our national governments, as part of the implementation of cross-compliance, to develop indicators for a good agricultural and environmental condition (GAEC), which are easy to understand and enforce, whilst at the same time designed to meet high-level sustainable development objectives.

The CAP is in an important phase of transition. We will, at both the EU and national levels, have to make sure that we don't lose focus on content in our concern about reducing administrative burdens and managing the process of change itself.

On behalf of the EEAC Working Group on Agriculture,  
Yours sincerely,

Prof. Jan Douwe van der Ploeg  
Chair of the EEAC Working Group on Agriculture  
Member of the Council for the Rural Areas (RLG), The Netherlands