



# CAP Strategic Plans: Green Deal or No Deal?

IN-DEPTH ANALYSIS  
OF SEVEN COUNTRY CASES

Friends of the Earth Europe campaigns for environmentally sustainable and socially just societies, unites more than 30 national organisations with thousands of local groups, and is part of the world's largest grassroots environmental network, Friends of the Earth International.

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## **GLOSSARY**

**AECM:** Agro-environmental commitment measure. CAP incentive-based instruments funded by Pillar II which provide payments to farmers for voluntary environmental commitments related to preserving and enhancing the environment, and maintaining the cultural landscape.

**CAP:** Common Agricultural Policy

**CSP:** CAP Strategic Plan

**EAFRD:** European Agricultural Fund for Rural Development

**EAGF:** European Agricultural Guarantee Fund

**Ecoscheme:** Payment schemes, funded by Pillar I, aiming at the protection of the environment and climate.

**EGD:** European Green Deal

**GAEC:** Good Agricultural and Environmental Conditions. Standards aiming to achieve a sustainable agriculture. Keeping land in good agricultural and environmental conditions is directly related to issues such as: minimum level of maintenance; protection and management of water; soil erosion; soil organic matter; soil structure. These standards are to be respected by European farmers receiving direct payments or some of the rural development payments.

**SMR:** Statutory Management Requirements. All farmers, whether receiving CAP support or not, have to respect statutory management requirements (SMR). The SMR include EU rules on public, animal and plant health; animal welfare; and the environment. With GAEC requirements, they are the "cross-compliance rules"

**UAA:** Utilised agricultural area

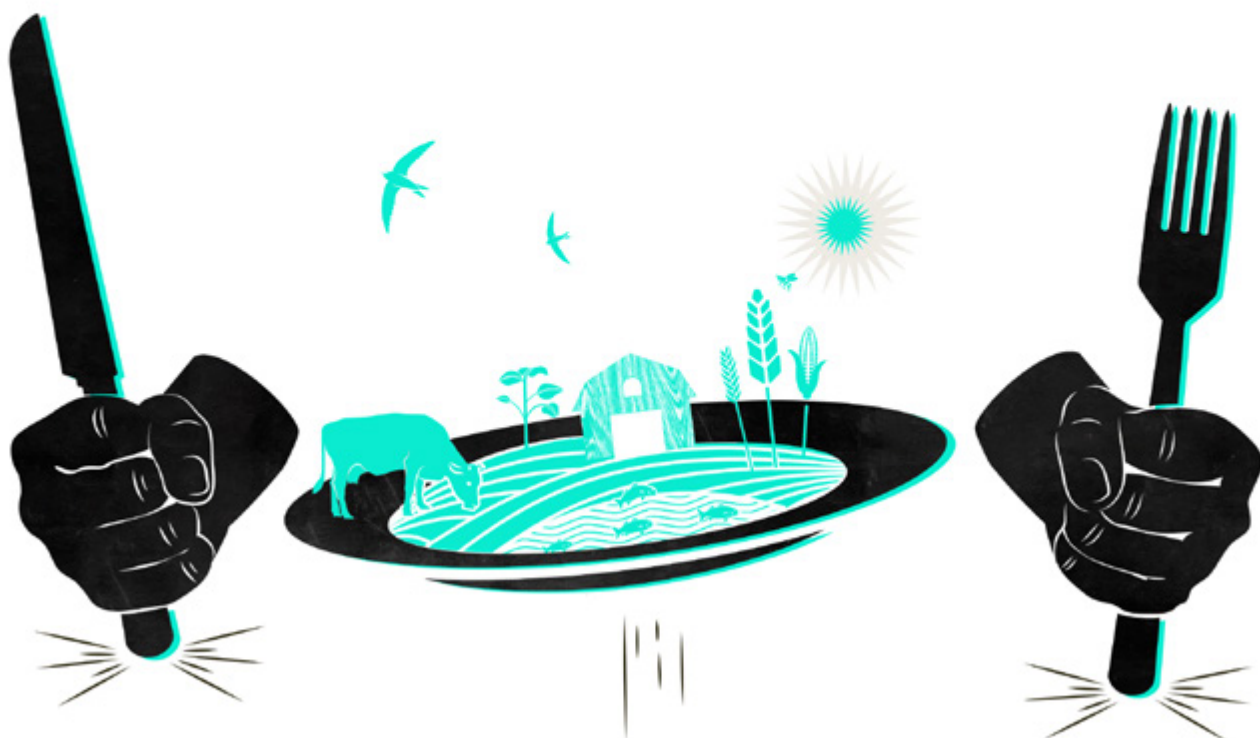
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## IN-DEPTH ANALYSIS OF SEVEN COUNTRY CASES

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# INTRODUCTION



**The Common Agricultural Policy (CAP) is a powerful piece of legislation that has the potential to make or break the goals of the European Union’s flagship Green Deal and its Farm to Fork Strategy.**

The CAP is the most important agricultural policy of the European Union, determining the funding priorities for food production and accounting for around 30% of the EU’s budget. Introduced 60 years ago, it has mainly supported the intensification of agriculture to the benefit of agribusinesses and large-scale farms over small-scale food producers and nature.

The new CAP, which will start operating in 2023, has been described by the European Commission as being “fairer and greener”. While it does integrate some green rhetoric and environmental and social measures, it remains a missed opportunity to support a transition towards more sustainable food production models<sup>1</sup>. The new measures are riddled with loopholes and will continue to reward farmers mostly based on how large their fields are and not on how they act for the climate and biodiversity<sup>2</sup>.

Member States now have the responsibility to create national CAP Strategic Plans that go further than the weak CAP commitments, and use the funds available to subsidise measures that meet the EU Green Deal targets. Unfortunately, as several NGOs have pointed out, the majority of the national Strategic Plans fall short of real ambition<sup>3</sup>.

This report provides an assessment of the CAP Strategic Plans (hereafter, Plans or CSPs) for seven EU Member States: Austria, the Czech Republic, Denmark, Malta, Poland, Spain and Sweden<sup>4</sup>, compiling analysis carried out by Friends of the Earth Europe’s national member organisations<sup>5</sup>. It focuses on the Plans’ likely contribution to the agriculture related targets of the European Green Deal (hereafter, EGD), in particular the Farm to Fork and Biodiversity Strategies, along with the likely impact on small-scale farmers and producers, and fair working conditions for farm workers.

1 <https://friendsoftheearth.eu/press-release/cap-fails-small-farmers-and-the-environment-yet-again/>

2 <https://friendsoftheearth.eu/publication/the-re-cap-does-the-eus-new-farming-policy-match-eu-green-deal-goals/>

3 <https://eeb.org/cap-national-strategic-plans-will-fail-to-deliver-on-european-green-deal-environmental-and-climate-objectives-ngo-assessment-reveals/>

4 This analysis is based on publicly available CAP Strategic Plans submitted at the time of writing this report (i.e. assessed before March 2022) and therefore does not account for potential changes since.

5 See Annex 1 for full methodology

# The food and farming system we want

Moving towards fair and green food and farming systems requires fundamental changes to the way the EU produces and distributes food. What is needed is a transition towards food systems based on food sovereignty principles and agroecological practices that benefit biodiversity, soil health and the climate and protect farmer's rights.

In 2020, the European Commission published the Farm to Fork and Biodiversity strategies as part of its flagship EGD which, although far from perfect, integrate some important objectives that could shift the tide. Unfortunately, EU public policies, including the CAP, have not concretely incorporated these measures and instead continue to promote and subsidise industrial farming at the expense of small-scale farmers and nature.



**Food sovereignty:** the right of peoples to healthy and culturally appropriate food produced through ecologically sound and sustainable methods, and their right to define their own food and agriculture systems<sup>6</sup>.






**Agroecology:** a system of food production based on ecological, social and political principles that value healthy and diverse agroecosystems and social networks, minimising external inputs, secure livelihoods for producers, and nutritious food accessible to all.

<sup>6</sup> <https://nyeleni.org/IMG/pdf/DeclNyeleni-en.pdf>

## European Green Deal objectives

The Farm to Fork Strategy and Biodiversity Strategy included in the EGD aim at making our food system fairer, healthier and more environmentally-friendly. Strategies establish several targets related to agriculture:

The Farm to Fork Strategy also aims to make our food system fairer and healthier, both in terms of fair incomes for primary producers and affordable and healthy diets for consumers.

-  Reducing the overall use and risk of chemical pesticides by **50%**;
-  Farming **25%** of the EU's agricultural land organically;
-  Reducing nutrient losses by at least **50%** (excess of especially nitrogen and phosphorus in the environment), and reducing the use of fertilisers by **20%**;
-  Reducing the sales of antimicrobials in animal farming and aquaculture by **50%**; and
-  Bringing back at least **10%** of agricultural area under high-diversity landscape features.

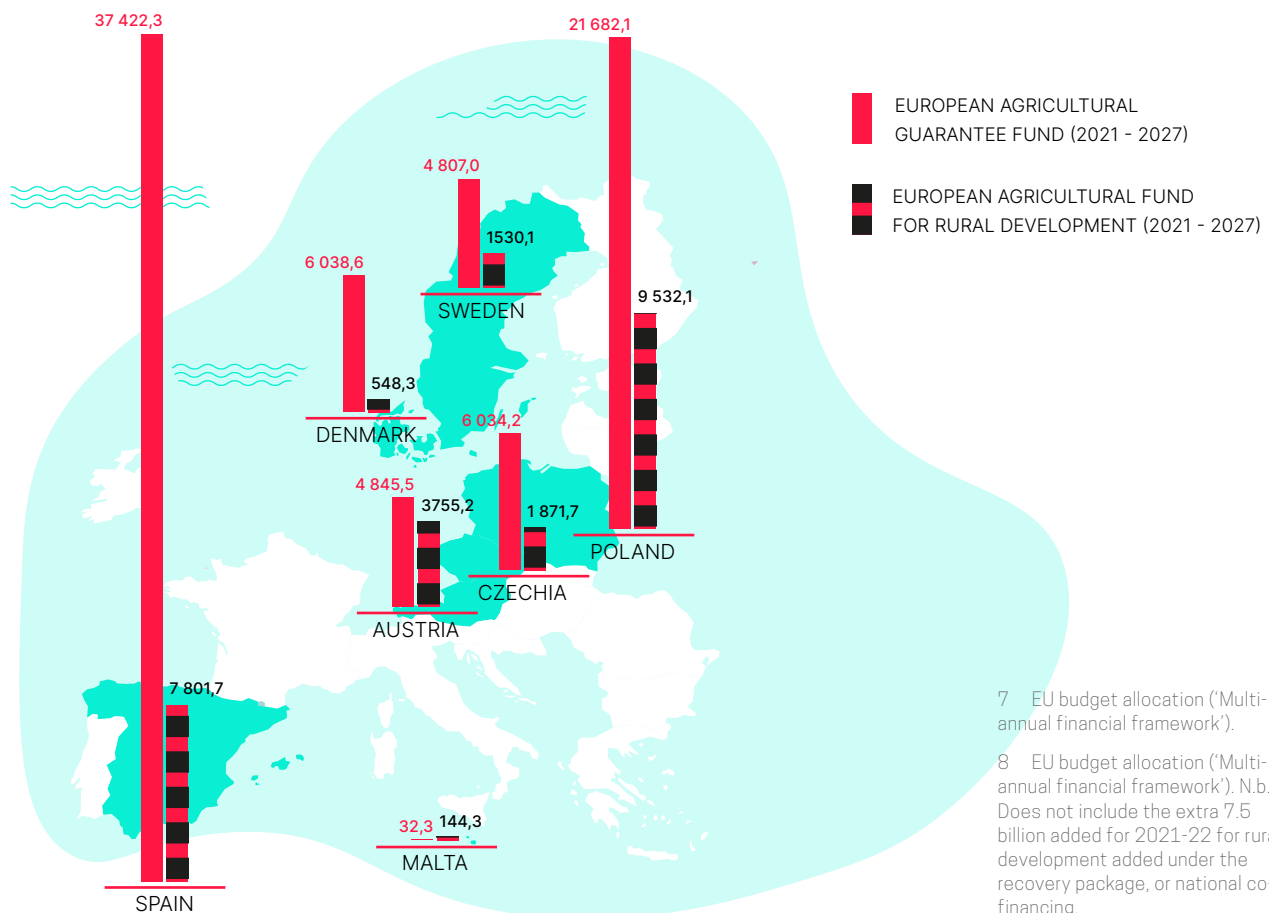
# The CAP's contribution to the system we want

The new CAP will run from 2021 to 2027, with new rules coming into place in 2023. It has an overall budget of around €387 billion, almost a third of the EU's overall budget, making the CAP a powerful tool to shape our food and farming systems.

The CAP budget is split across two funds:

1. The European Agricultural Guarantee Fund (EAGF, also known as 'Pillar I') which totals €291.1 billion from 2021-7 (in current prices). This is broadly speaking the 'income support' fund for farmers; and
2. The European Agricultural Fund for Rural Development (EAFRD, also known as 'Pillar II'), which totals €95.5 billion from 2021-7. This is known as the Rural Development Pillar, which funds wider measures (environmental and other) to farmers, other land managers and non-land managers in rural areas.

The Member States covered in this assessment have been allocated the following amounts of CAP funding out of the overall EU budget for the 2021-27 period (million euros):





The next CAP regulations<sup>9</sup> set out rules for how the money can be spent. The main regulation requires Member States to draw up CSPs that cover both Pillar I and Pillar II spending, which had to be submitted by January 2022.

- It includes some environmental requirements, such as: new mandatory requirements for recipients, including on protecting carbon-rich soils (peatlands and wetlands), crop rotation (instead of crop diversification<sup>10</sup>) but with derogations permitted and a small increase in the amount of arable land that must be devoted to nature.
- Other environmental requirements remain the same compared to the previous CAP, such as rules on minimum soil cover, maintenance of permanent grassland and non-ploughing of 'environmentally sensitive' permanent grasslands in protected areas (Natura2000 sites).
- 25% of Pillar I should be devoted to ecoschemes (although there are some derogations). Ecoschemes are voluntary schemes to foster practices that should be good for the environment, the climate or animal welfare (the criteria for ecoschemes established in the CAP are however very broad and could include measures with no or limited environmental benefit).
- 35% of Pillar II devoted to environmental and climate objectives (limited to certain measures).

In terms of measures for small farmers there is:

- A mandatory redistributive payment of 10%, although there are some opt-outs for Member States. There is also an optional payment for small farmers (with a maximum of €1250 annually). However, Member States can still set minimum thresholds for who can get support, meaning that farms under a certain size can be excluded from getting any funding.
- 'Social conditionality' to improve working conditions for farm workers. Additional checks on CAP recipients have been introduced regarding compliance with various pieces of EU labour law. Member States must implement these new social conditionality rules by the start of 2025 at the latest.

The vast majority of payments in the CAP (both in Pillar I and II) remain however payments per hectare, resulting in subsidies going mainly to industrial agriculture and leading to environmental challenges, land concentration and farm income inequalities.

There is also no legal link between the CAP and the EGD, as the European Commission introduced the EGD in 2019, after it had published its proposal for the

new CAP, and refused to revise it despite countless protests from scientists, NGOs and smallholder farmers.

Instead, the Commission published a paper<sup>11</sup> on the links between the CAP and the EGD and insisted that it would ensure their alignment. This is largely to be based on the process of 'CAP Strategic Planning', whereby Member States were asked to conduct an assessment of their national needs on all of the CAP objectives, propose measures to address these needs and set targets for the roll out of these measures. Countries were also required to include an annex in their CAP plans regarding their contribution to the agriculture-related EGD targets. At the time of writing, for most targets, only a minority of Member States have filled this in<sup>12</sup>.

The Paper also made links between the Green Deal targets for agriculture assessed in this report and the relevant 'result indicators in the CAP', against which Member States will have to set targets, along with the relevant impact indicators, as described in the following table<sup>13</sup>:






9 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L:2021:435:TOC>

10 The practice of cultivating more than one variety of crops belonging to the same or different species in a given area

11 [https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/sustainability\\_and\\_natural\\_resources/documents/analysis-of-links-between-cap-and-green-deal\\_en.pdf](https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/sustainability_and_natural_resources/documents/analysis-of-links-between-cap-and-green-deal_en.pdf)

12 Except for organic where 19 Member States including a national value or target. See <https://data.consilium.europa.eu/doc/document/ST-7022-2022-INIT/en/pdf>

13 N.B. the authors have updated the indicator numbers to reflect those in the final CAP strategic plan Regulation.

Green Deal target <sup>14</sup>	Impact indicators (as laid down in Annex I) or Context indicators (as envisaged in secondary legislation)	Result indicators (as laid down in Annex I)
 <p>Reducing by <b>50%</b> the use and the risk of chemical pesticides by 2030</p> <ul style="list-style-type: none"> <li>&gt; Reducing by <b>50%</b> the use of high-risk pesticides</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>I.18</b> Sustainable and reduced use of pesticides: risks, use and impacts of pesticides</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>R.24</b> Sustainable and reduced use of pesticides: share of utilised agricultural area (UAA) under supported specific commitments which lead to a “sustainable use of pesticides”<sup>15</sup> in order to reduce risks and impacts of pesticides such as pesticides leakage</li> </ul>
 <p>Reducing by <b>50%</b> the sales of antimicrobials for farmed animals and in aquaculture by 2030</p> <ul style="list-style-type: none"> <li>&gt; Reducing nutrient losses by at least <b>50%</b> in 2030</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>I.28</b> Limiting antimicrobial use in farmed animals: sales/use of antimicrobials for food-producing animals</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>R.43</b> Limiting antimicrobial use: share of livestock units (LU) concerned by supported actions to limit the use of antimicrobials (prevention/reduction)</li> <li>&gt; <b>R.21</b> Protecting water quality: share of agricultural land under supported commitments for the quality of water bodies</li> </ul>
 <ul style="list-style-type: none"> <li>&gt; Reducing the use of fertiliser by <b>20%</b> by 2030</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>I.15</b> Improving water quality: gross nutrient balance on agricultural land</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>R.22</b> Sustainable nutrient management: share of agricultural land under commitments related to improved nutrient management</li> </ul>
 <p>Achieve <b>25%</b> agricultural area under organic farming by 2030</p>	<ul style="list-style-type: none"> <li>&gt; <b>C.33</b> Agricultural area under organic farming</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>R.29</b> Development of organic agriculture: share of UAA supported by the CAP for organic farming, with a split between maintenance and conversion</li> </ul>
 <p>Increasing land for biodiversity, including agricultural area under high-diversity landscape features</p>	<ul style="list-style-type: none"> <li>&gt; <b>I.21</b> Enhanced provision of ecosystem services: share of UAA covered with landscape features</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>R.34</b> Preserving landscape features: share of agriculture land under commitments for managing landscape features, including hedgerows and trees</li> </ul>
Social target	Impact indicators	Result indicators
<ul style="list-style-type: none"> <li>&gt; Improving the economic situation of small scale farmers and producers in marginalised areas</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>I.24</b> A fairer CAP: Improve the distribution of CAP support</li> </ul>	<ul style="list-style-type: none"> <li>&gt; <b>R.6</b> Redistribution to smaller farms: percentage additional support in the form of direct payments per hectare for eligible farms below average farm size (compared to the average direct payment per hectare granted to all beneficiaries)</li> </ul>

It is important to note that the targets for the result indicators do not directly translate into the associated Green Deal objective. The CAP result indicator targets are generally a target for how many hectares will be covered by a specific measure. For instance, when it comes to pesticide use reduction, the CAP result indicator target does not measure how much pesticide use itself will go down by. This will depend on the quality of the schemes: how demanding they are in terms of reductions required, and how effective they are at delivering. Therefore, a high CAP target does not

necessarily mean high performance on the Green Deal target, and vice versa for low targets.

Nevertheless, when both the level of the CAP target and quality of the schemes are taken into account, it can offer some indication of the extent to which a Member States' CSP will contribute to achieving the Green Deal objective in question. This assessment therefore looks at both the targets that Member States set on the CAP results indicators as well as the information provided about the quality of the measures.

<sup>14</sup> As set out in the Farm to Fork and Biodiversity Strategies.

<sup>15</sup> This analysis is based on publicly available CAP Strategic Plans submitted at the time of writing this report (i.e. assessed before March 2022) and therefore does not account for potential changes since.





# AUSTRIA



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%

41.83%

The result indicator R.24 on pesticide reduction is at 41.83% of UAA.

The CSP does not provide risk-based pesticide levies, nor advice and training on sustainable crop protection. There are minor improvements compared to the Agri-environmental Measures ("ÖPUL") 2014-2020 in some sub-topics, although they are offset by deterioration in other sub-areas. There is still a lack of a flexible and attractive promotion offer for the reduction of pesticides. The availability and transparency of data on pesticide use in Austria are poor, and access to AEM subsidies is not linked to refraining from using glyphosate. On the contrary, even farming methods that are tied to the use of glyphosate are going to be subsidised with AEM payments.

■ The current funding offer is by far not sufficient to achieve the 50% reduction target and for a trend reversal in the dependence on synthetic pesticides.

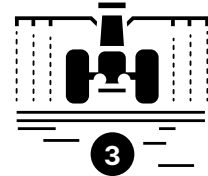


FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY

21.96%

The result indicator R.29 on the development of organic agriculture (excluding alpine pastures) is at 21.96% of UAA.

In Austria, 26.4% of agricultural land is used for organic production (including alpine pastures), which means the 25% target has already been reached. The Austrian CSP states that a 30% share of organic production should be achieved by 2027. It should be noted that this target would be exceeded by the mere growth in the share of area under organic production, if the trend between 2015 and 2020 would continue. Total funding for organic farming is planned to increase compared to the implementation of the 2014-2020 period, but it seems to come from the increase in area alone, while the AEM payments per hectare will slightly decrease for organic farmers. The CSP still provides for a 5% premium for investments in organic farms. However, the comparatively low premium for organic (compared to conventional farming methods) envisaged in the CSP is not attractive enough, as it is lower than basic grassland and arable AEM payments for conventional farming, while the requirements for organic farming are higher. It thus jeopardises the successful development of organic farming in Austria.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND REDUCING THE USE OF FERTILISERS BY 20%

49.56% > R.21

49.56% > R.22

The result indicator R.21 on water quality is at 49.56% of UAA and R.22 on sustainable nutrient management is also at 49.60% of UAA.

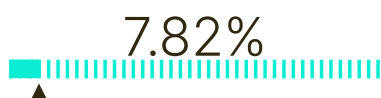
However, no significant interventions towards the promotion of more sustainable extensive and land-based animal husbandry are discernible in the Austrian CSP. In particular, it subsidises 40% of infrastructure investment without corresponding environmental or climate requirements as a prerequisite for subsidies. This can favour the expansion of livestock housing capacities, and thus drive further intensification of meat and dairy production, the largest systemic driver of the oversupply of nitrogen. Comprehensive area-wide effective groundwater protection measures are not evident in the Austrian CSP, and additional schemes are needed to reduce the use of mineral fertilisers and appropriate animal husbandry, as well as an expansion of manure composting and humus- and nitrogen-fixing crops.

■ The Austrian CSP will therefore fail to contribute to meeting this EGD objective.

EGD objective.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES



The result indicator R.34 on the landscape element is at 7.82% of UAA.

Austria is going to require only 7% of biodiversity area within the most biodiversity effective horizontal AECM module "UBB"<sup>16</sup> which is planned to cover almost 60% of UAA. In terms of space for nature, the target may be adequate, but measures are unlikely to deliver due to unattractive payment levels, particularly for organic farmers. For the creation of biodiversity and nature areas, there are clearly better incentives compared to 2015. The definition of environmentally sensitive permanent grasslands is also good although only three hectares per farm are allowed.

Nonetheless, the Austrian CSP does not provide for any ecoscheme with biodiversity benefits. Although both AECM measures and the GAEC8 conditionality combined are going to contribute to the overall 10% space for nature target, it is questionable whether the measures will be sufficient to achieve this objective by 2030.

■ The 150 M € planned per year is not likely to stop and reverse the loss of biodiversity and the anticipated area covered by funded landscape elements will probably not be sufficient to make a substantial change to meet the



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

There is no target set for the result indicator R.43 on limiting the use of antimicrobial substances.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

Unfortunately, there are no measures whatsoever in the Austrian CSP to contribute to this objective.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALISED AREAS

106.96%

The result indicator R.6 on the redistribution to smaller farms is at 106,96%.

A mandatory capping of direct payments at 100,000 € will be introduced but this is too high for Austria, making capping rather ineffective. Furthermore, via the "Complementary Redistributive Income Support", 10% of the total direct payments will be taken away from all farms and re-allocated to the first hectares. There is also a "Basic Income Support for Sustainability" (reduced compared to the previous CAP) and some payments for areas with natural constraints as part of pillar II.

■ These co-financed payments are crucial for mountain farmers, but too low. Essential small and medium-sized farms can only be safeguarded through redistribution and more fairness in the CAP, as well as market regulation and fairer prices, but the measures proposed in the CSP are not enough. In sum, redistributive effects will be weak and fairness is missing.



The comparatively low premium for organic farming envisaged in the Austrian Plan is far from attractive enough.

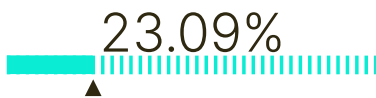
<sup>16</sup> "Umweltgerechte und biodiversitätsfördernde Bewirtschaftung", basic AECM module in Austria



# CZECH REPUBLIC



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%



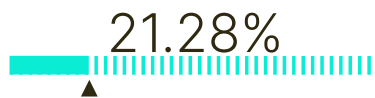
The target for result indicator R.24 on pesticide reduction is 23.09% of UAA.

The measure on organic farming has the highest potential for reducing pesticides. Conditionality requirements are also claimed to contribute, but the main requirement that would help reduce pesticides (i.e. crop rotation) is not demanding (allowing a same crop to be grown twice or more often if catch-crop grown between). Most of the measures proposed in the CSP are unchanged from the past CAP or do not contribute significantly to overall pesticide reduction. Although pesticide use has been overall decreasing in Czechia in recent years, there are pesticide residues found in most water bodies, often above the limit.

■ Proposed measures could help further decrease the use of pesticides but they will not contribute significantly to the unsatisfactory situation.



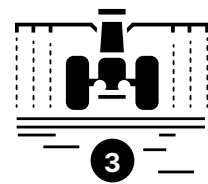
FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY



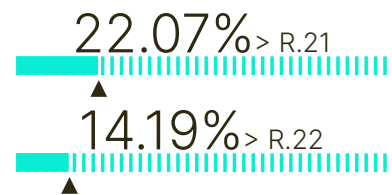
The target for result indicator R.29 on the development of organic agriculture is 21.28% of UAA.

Currently, 15% of UAA is farmed organically, mostly on permanent pastures. Financial support per hectare for organic farming will be about 20 to 40% higher than in the previous CAP. Advisory services supported in the CSP, on how to transition from conventional farming to organic farming, will also be highly important, mainly for farms on arable soil.

■ However, because of the current lack of advisors, it is not clear what availability and quality of advisory services there will be.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND THE USE OF FERTILISERS BY 20%



The target for result indicator R.21 on water quality is 22.07% of UAA and the result indicator target for R.22 on sustainable nutrient management is at 14.19% of UAA.

The main contributing interventions listed in the CSP are the AECM on grassing the arable land, and the measure on organic agriculture. There is also an AECM on the extensive use of permanent grasslands and an ecoscheme on precision farming. Increase of non-productive areas will also lead to the decrease of fertilisers use. Some of these interventions can potentially help in partially decreasing the use of fertilisers while others will only maintain a status quo.

■ Even though the CAP is likely to make some contribution to the objectives, achieving an overall reduction close to either the 50% or 20% EGD targets appears unlikely.



Although pesticide use has been overall decreasing in Czechia in recent years, pesticide residues are still found in most water bodies.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES

6.37%



The target for result indicator R.34 on the landscape features is at 6.37% of UAA.

Conditionality requirements (GAEC 8) only require 3% of truly non-productive areas<sup>17</sup>. There are also interventions in Pillar II, but – apart from agroforestry intervention – there are no incentives for creating stable landscape features. The support for bio-belts and other supports to biodiversity on arable lands are positive but they aim at only 1% of the agricultural area.

■ Therefore, although there is a positive change in contrast to the previous CAP, the CSP will not be able to significantly approach the goal of 10% of agricultural area under high-diversity landscape features by 2030.

<sup>17</sup> The conditionality requirement concerns 7% of non-productive area, but only 3% needs to be totally non-productive and cannot be nitrogen-fixing crops and catch crops.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

The CSP only mentions that Czech Republic will implement social conditionality from 2025. There are no other details in the CSP.



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

24.37%



The target for result indicator R.43 on limiting the use of antimicrobials substances is set at 24.37% of livestock units.

The Czech Republic has decreased use of antimicrobials significantly in recent years. One direct intervention provided in the CSP targets pigs' immunity through vaccination and should probably help to decrease the use of antimicrobials.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALIZED AREAS

125.59%

The target for result indicator R.6 on the redistribution to smaller farms is 125.59%

The high redistributive payment and collective payment for small farms in the CSP should benefit relatively small farmers (in the Czech context where average size of the farm is 130 ha) much more than in the previous CAP.

■ Although the impact on large farms is not clear, the CSP will significantly contribute to this objective.



# DENMARK



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%



The target for result indicator R.24 on pesticide reduction is 17.27% of UAA.

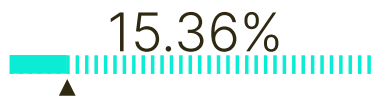
The CSP uses indirect measures such as support to organic farming (via an ecoscheme), training, and advice on sustainable pest and disease control techniques and promotes precision technologies to achieve the overall reduction targets. It also uses some conditionality but the requirement for crop rotation (GAEC 7) can be met by complying with a crop diversification requirement for rotational areas of farm level<sup>18</sup>.

Overall, the CSP does not include concrete targets for a fundamental shift to smaller and organic farms that would substantially help reduce pesticides use. Moreover, the focus on precision spraying and other technologies contribute to maintaining the agricultural model of industrial and input-intensive farming, instead of supporting a transition to food sovereignty. There are no concrete targets, nor calculations proposed for total pesticide reductions that would result from the CSP measures. The CSP will therefore very likely fail to meet this objective.

<sup>18</sup> To fulfil this GAEC, the Member State can decide to use only crop diversification rather than crop rotation. However, crop rotation is more effective at reducing dependency on pesticides.



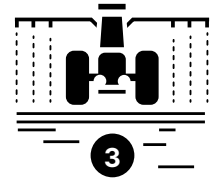
FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY



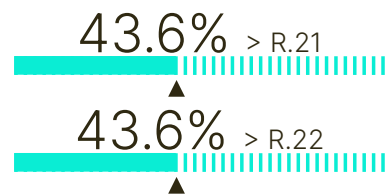
The result indicator R.29 on the development of organic agriculture is at 15.36% of UAA.

The ecoscheme for organic farming aims at doubling the area under organic farming in Denmark but does not anchor this in a specific target. As the area under organic farming is currently at 10.9% (according to IFOAM Organics), the measure would lead to a total up to 22%, which remains lower than the EU target of 25%.

Since Denmark is one of the most intensively farmed countries in the world, the target of doubling the organic area - while still ambitious - will fall short in contributing to the 25% Farm to Fork target at EU level.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND THE USE OF FERTILISERS BY 20%



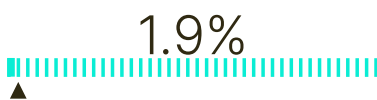
The result indicator R.21 on water quality is at 43.6% of UAA and the result indicator R.22 on sustainable nutrient management is also at 43.6% of UAA.

The CSP proposes measures and conditionality requirements for crop diversification and tillage, maintenance of grasslands and wetlands, as well as water and climate-related schemes that will have a positive impact on soil health and nutrient losses. Those measures should reduce nitrogen and phosphorus inputs, contribute to the gradual depletion of soil nutrients, and to a reduction in nitrogen leaching.

However, no measures are proposed to reduce nutrient surpluses stemming from livestock production, despite Denmark's meat-heavy agriculture being a source of great nitrogen pollution. There are also no concrete targets or specific measures for fertiliser use reduction. All CSP measures seem to be indirect and mainly related to increasing the area under organic farming (organic land support ecosystem) or technology development. It is therefore difficult to understand what reductions these measures will lead to. Thus, the actions in the CSP are unlikely to be enough to meet the EGD objectives.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES



The target for result indicator R.34 on the landscape element is 1.9% of UAA.

Support is provided to farmers who wish to have small areas of uncultivated land (e.g. via the ecoscheme for biodiversity and sustainability). Denmark also requires all arable farmers to have a minimum of 4% of area for nature (GAEC 8).

■ While it is positive to include more “pockets” of nature in the agricultural landscape, binding and mandatory measures are needed to achieve the objectives of the Farm to Fork strategy and to restore Danish biodiversity. The voluntary measures proposed in the CSP are not sufficient.



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

There is no target set for the result indicator R.43 on limiting the use of antimicrobial substances in the CSP, although Denmark does have national measures on that matter (8% reduction of antibiotic use in pigs by end of 2022 with a rate of 2% per year from 2019 to 2022).

Denmark is in the top half of EU countries with the highest antibiotic sales numbers according to the European Medicines Agency. Thereby, the CSP does not live up to the Farm to Fork target of 50%.

■ Furthermore, the CSP does not include any targets for reducing livestock production, which would be the most effective way of reducing the use of antimicrobials. This shows the lack of will to transform the Danish agricultural sector.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

There is no specific mention of fair working conditions in the CSP.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALISED AREAS

104.76%

The target for result indicator R.6 on the redistribution to smaller farms is at 104.76%.

Denmark wants to “derogate” from the obligation to redistribute 10% of direct payments to small farmers, on the basis that this requirement is already addressed by other interventions.

■ However, the reasons given below do not seem to be adequately justified:

> An analysis shows that a “preponderance” of farms smaller than the Danish average (68.8 hectares) will apply for support under the ecoscheme and slaughter premiums coupled to the payment. These measures are expected to provide 6% more support to small farms than to large, but the calculations are not justified with evidence.

> The termination of direct payment entitlements in January 2023 will, according to the Plan, be mainly to the detriment of beef and starch potato producers and result in a transfer of money from large to small farms, however the latter is not explained or documented.



There are no targets for reducing industrial livestock production, despite the huge environmental costs of Denmark’s meat-heavy agriculture.



# MALTA



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%

2.98%



The result indicator R.24 on pesticide reduction is at 2.98% of UAA.

In addition to national measures, the CSP proposes one ecoscheme that includes a reduced use of pesticides. This is further reinforced by conditionality requirement (GAEC 4) with the establishment of buffer zones along watercourses to protect groundwater against pollution, the use of mechanical weeding of orchards and vineyards instead of chemical controls, the designation of protected areas and the establishment of Natura2000 site management plans, and the implementation of restrictions regarding the application of soil pesticides and non-organic fertiliser to the parcels under commitment during a designated period. The CSP also provides investment support in pesticide equipment (precision technologies), farm modernisation and restructuring with improved efficiency of pesticide, an alternative to pesticide equipment, etc.

■ The planned measures may reach the goal to reduce the use of chemical pesticides slightly but it is very likely to be very far from the 50% target of the Farm to Fork Strategy.



FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY

0.77%

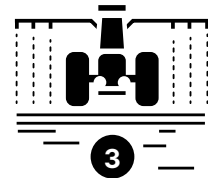


The result indicator R.29 on the development of organic agriculture is at 0.77% of UAA.

However, Malta's stated aim in the CSP for agricultural land under organic farming by 2030 is 5%.

The CSP provides some support for organic farming maintenance and conversion. It also proposes training that includes start up courses designed specifically for new entrants and young farmers. Such courses will be developed throughout the implementation of the plan based on emerging policy needs within the local context.

■ In sum, Malta's objective and the foreseen practices do not meet the goal of 25%.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND REDUCING THE USE OF FERTILISERS BY 20%

2.5% > fertilizers



There is no target set for the result indicator R.22 on sustainable nutrient management. Malta's indicative target for reducing the use of fertilisers by 2030 is 2.5%, which is below the 20% target.

The CSP provides an ecoscheme on nitrogen-fixing crops as soil cover and catch crop, which is presented as allowing for a reduced need for pesticides and synthetic fertilisers. It will be complemented by organic payments, GAEC requirements on buffer strips, mechanical weeding and other restrictions including in protected areas. There is also investment support particularly in the field of precision technologies.

■ Nevertheless, Malta's CSP does not consider any measurement regarding the use of phosphorus and there is no link between nitrogen leakage and groundwater table pollution, which is a huge issue in the island of Malta in terms of impacts on local groundwater sources.



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

15%



There is no target set for the specific result indicator R.43 on limiting the use of antimicrobials substances. However, Malta's indicative target for reducing sales of antimicrobials for farmed animals by 2030 is 15%.

Malta's indicative target for reducing sales of antimicrobials for farmed animals by 2030 is 15%, and according to the CSP meeting this target would be done by limiting the use of antimicrobials only in situations where necessary. However, it is not stated under what conditions it could be "necessary". Malta is expected to meet this target through measures under EAGF and EAFRD, but again, nothing is specified in the CSP itself.

■ National measures are planned but the CSP will unlikely help reach this EGD target.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

An intervention was designed on the current direct payment scheme for farmers with a minimum of 0.3 hectares of eligible agricultural areas, automatically excluding smaller farms which make up a high proportion of farms in Malta. Many farmers will therefore not be able to apply for the CAP funding, thereby impeding income support and fair working conditions.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALISED AREAS

There is no target fixed for the result indicator R.6 on the redistribution to smaller farms.

The basic income support for sustainability for small farmers will apply to the entire Maltese territory.

■ However, two issues are not addressed in the CSP: 1) improvement of risk management in Maltese agriculture and making farmers more financially resilient, and 2) reforming land tenure laws and developing institutions and incentives to ease access to new entrants.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES

41.83%



The target for indicator R.34 on the landscape element is set at 0.889% of UAA.

However, Malta's indicative target for high-diversity landscape features is 9.5% and this is based upon the area of fallow land.

■ This EGD target is the only one Malta is on track with.



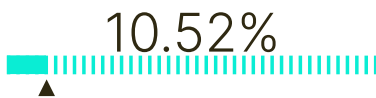
Many farmers in Malta cannot apply for CAP funding, thereby impeding income support and fair working conditions.



# POLAND



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%



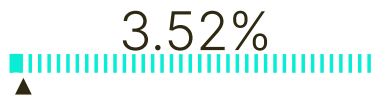
The result indicator R.24 on pesticide reduction is at 10.52% of UAA.

The Polish CSP proposes two eco-schemes on integrated production and biological pest control to ensure that this goal is achieved<sup>19</sup>. However, neither the level of subsidy nor the planned number of hectares in these schemes will cause a rapid development of either production method. Further, for integrated production the criteria are not precise and actually differ little from conventional pesticide use.

■ There is little doubt that this goal will not be achieved.



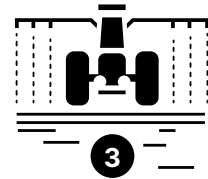
FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY



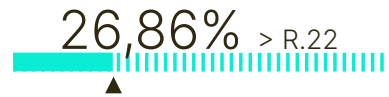
The result indicator R.29 on organic farming development is at 3.52% of UAA.

The CSP proposes one ecoscheme on organic farming to reach the objective. Additional support for this ecoscheme will be provided by a couple of interventions and its beneficiaries can benefit from investment in farms enhancing competitiveness as well as investments contributing to environmental and climate protection. The proposed result indicator is practically no different from the current level of about 3.4% UAAA in 2020. Currently, Poland is in the last fifth position in the ranking for organic agriculture development in the European Union.

■ This puts Poland in a very unfavourable position in view of the EGD objective to increase organic area in the EU to 25% by 2030.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND THE USE OF FERTILISERS BY 20%



There is no target set for the result indicator R.21 on water quality of UAA and the result indicator R.22 on sustainable nutrient management is set at 26.86% of UAA.

The Polish CSP provides five eco-schemes on winter catch crops and intercrops, on the extensive use of permanent grassland with livestock, manure mixing on arable land within 12 hours of application, on the application of liquid natural fertilisers by methods other than splashing, i.e. as a soil application and on the development and adherence to fertiliser plan. Advisory services are also planned to support these eco-schemes. Additional support will be provided by rural development interventions aiming for the development of precision agriculture.

■ The whole action of limiting nutrient run-off from fields is set at 2,110,000 ha, which can be considered as a reasonable amount. If followed by training and support for farmers, the 50% target can be reached but more measures will be required to reach fertiliser use reduction by 20%.

<sup>19</sup> One of them is the ecoscheme "Conducting plant production in the Integrated Plant Production system" with the payments are foreseen for 20 871 ha. The ecoscheme "Biological Crop Protection" in turn provides for the inclusion of only 5,000 ha. The area of fruit tree crops alone is 242 511 ha (Central Statistical Office 2018), the area of berry fruit crops is 122 642 ha (CSO 2018), and these are the crops where pesticides are used the most.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES

2.13%



The target for result indicator R.34 on the landscape element is set at 2.13% of UAA.

The CSP provides support within the framework of ecoschemes for those allocating at least 10% of their UAA to non-productive areas, and payments for maintenance of mid-field afforestation, agroforestry systems, and areas with melliferous plants. Under Pillar II, the CSP proposes interventions promoting the establishment and maintenance of landscape features, the creation of ecological corridors and the protection of forest biodiversity, as well as interventions limiting the intensive farming practices (e.g. protection of valuable habitats and endangered species in and outside Natura2000 areas, limitation/ban on the use of fertilisers and pesticides).

■ Despite the additional ecoschemes and Pillar II measures, the low target implies that the 10% objective will still not be met.



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

**There is no target set for the result indicator R.43 on limiting the use of antimicrobials substances.**

The CSP proposes one ecoscheme on animal welfare, aiming at addressing behavioural needs in rearing and breeding. Theoretically, this has an impact on the need for antibiotics, but increasing the size of buildings by a minimum of 20% in the case of sows will not dramatically improve their living conditions and will not reduce the incidence of disease. Thus, the need for antibiotics is likely to remain the same. Similar minimal solutions are recommended for cattle and poultry. Farmers are to be mandatorily trained under intervention on methods to reduce antibiotic use.

■ These measures are unlikely to influence the realisation of this EGD objective.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

The labour rights of persons employed on an agricultural holding are governed by the Polish Labour Code. The payment of direct payments is not conditional on compliance with labour rights.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALISED AREAS

100.73%

**The target for result indicator R.6 on the redistribution to smaller farms is at 100.73%.**

The CSP provides support for small farms development under Pillar II. In Poland there are around 1.4 million holdings, of which up to 400,000 are holdings of over 100 ha, and they will not qualify for this measure. There are still 1 million potential applicants, and the measure is intended for about 16 thousand holdings.

■ The issue of small family farms disappearing will not be solved by this measure.



Increasing the size of buildings by at least 20% in the case of sows will not reduce the incidence of disease.



# SPAIN



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%

1.25%



The target for result indicator R.24 on pesticide reduction is 1.25% of UAA.

To achieve this, the CSP provides an AECM on agricultural land regarding alternatives to chemicals controls, the details of which are to be determined. These could for instance include the installation of diffusers according to the crop and area, and the release of predators, parasitoids and/or pollinators.

■ The target and measures are however far from being ambitious enough to contribute to the EGD target.



FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY

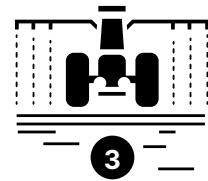
5.07%



The target for result indicator R.29 on the development of organic agriculture is 5.07% of UAA.

The CSP includes interventions in Pillar II to support the conversion and maintenance of organic farming and production.

■ According to the CSP, Spain foresees that they will reach 20% of UAA under organic farming in 2030, hence they will not reach the 25% EDG target.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND THE USE OF FERTILISERS BY 20%

0.34% > R.22



There is no target set for the result indicator R.21 on water quality. The target for result indicator R.22 on sustainable nutrient management is set at 0.34% of UAA.

The CSP provides support from Pillar II (AECM) for sustainable management of crops and pastures and an ecoscheme also requires sustainable input management for irrigated land.

■ However, the design of interventions to meet the needs of good water status and reduction of agricultural water pollution is questionable.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES

1.54%



The target for result indicator R.34 on the landscape element is set at 1.54% of UAA.

The conditionality requirements on a minimum share of arable land devoted to non-productive areas and features (GAEC 8) can be used to reach this objective. However, Spain opts for the minimum percentage for this GAEC of 4% non-productive area (or 7% if nitrogen-fixing or catch crops are grown, of which 3% must be non-productive).

■ In this way, Spain's CSP is likely to fall far short of the 10% target that is supposed to be across all types of farms.



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

There is no target set for the result indicator R.43 on limiting the use of antimicrobial substances.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

The CSP will define the aid and possible sanctions in 2022, for implementation starting in 2024. It will be based on a coordination system, developed between the Ministry of Agriculture and the Ministry of Labour in order to collect information on labour infringements of CAP beneficiaries. The Strategic Plan also mentions specific labour training for farmers but does not elaborate further.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALISED AREAS

150%

The target for result indicator R.6 on the redistribution to smaller farms is at 150%.

The aids to areas with natural or other specific constraints can also at least to some extent be helpful with regard to reaching this objective.



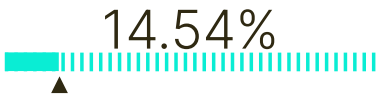
The design of interventions to meet the needs of good water status and reduction of agricultural water pollution is questionable.



# SWEDEN



REDUCING THE OVERALL USE AND RISK OF CHEMICAL PESTICIDES BY 50%



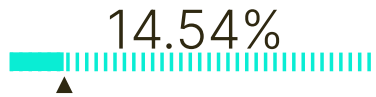
The result indicator R.24 on pesticide reduction is at 14.54% of UAA in 2028, but the target for the overall period is not available.

The CSP includes three types of area-based supports aiming at organic production development, pasture, hay meadow management, and one related to skill development on integrated pest management (IPM), bio-control, and preventive and mechanical control measures. The measures will most likely have an impact, but far from enough to reduce the general use and risk of pesticides by 50%. Practical measures such as "protection zones", alongside water bodies help to mitigate the risk of chemical pesticides but do not reduce their use. It is also questionable whether these measures will be sufficient to help farmers switch to more sustainable farming practices.

■ As long as conventional non-organic farming is the predominant system in Swedish agriculture, an overall reduction of 50% will be difficult to achieve through the proposed measures. Thereby, the CSP will not be enough to reach this EGD objective.



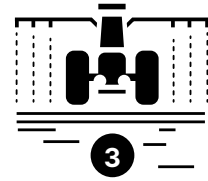
FARMING 25% OF THE EU'S AGRICULTURAL LAND ORGANICALLY



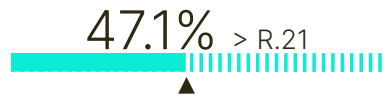
The result indicator R.29 on the development of organic agriculture is also at 14.54% of UAA in 2028, but the target for the overall period is not available.

The CSP provides support to encourage organic production, in the form of area-based and animal unit-based economic support for organic production. There is also support for (1) new models of cooperation, (2) the development of skills for the transition to organic farming, and the development of organic production methods.

■ The measures included in CSP might contribute to reaching this EGD goal as 20% of Swedish UAA are already farmed organically. However, the CSP overall favours large-scale and non-diversified agriculture, regardless of whether they are organic or conventional, with many organic farms in Sweden encountering the same limitations as conventional farms with regard to long-term sustainability, such as low landscape and farm biodiversity, soil compaction by heavy machinery and high nutrient losses.



REDUCING NUTRIENT LOSSES BY AT LEAST 50% (EXCESS OF ESPECIALLY NITROGEN AND PHOSPHORUS IN THE ENVIRONMENT) AND THE USE OF FERTILISERS BY 20%.



The result indicator R.21 on water quality is set at 47.1% of UAA in 2028, but the target for the overall target is not available and there is no target set for the result indicator R.22 on sustainable nutrient management.

Some measures target environmental elements such as buffer strips, wetlands, and catch crops or crops management practices that have a good potential to decrease nutrient losses and fertiliser use, improve soil structure, and also biodiversity. The CSP also supports precision agriculture planning, which includes planning of crop rotations, soil mapping, and nutrient analysis to ensure that correct amounts of fertilisers are applied. Crop rotations and soil mapping are however already standard measures for most Swedish farms, so additional compensation for such measures might not decrease the fertiliser use further. The CSP also supports more structural investments such as lime filter ditches, skills development, or innovations. However, there is a clear lack of systemic perspective in the CSP. Various practical in-field measures could have been put forward, to require for instance that protection zones consist of pollinator-friendly plants in order to be eligible for grants.

■ The CSP might contribute to the EGD objective, but stronger and binding complementary measures are needed to decrease fertiliser use by 20% and nutrient losses by 50%.



BRINGING BACK AT LEAST 10% OF AGRICULTURAL AREA UNDER HIGH-DIVERSITY LANDSCAPE FEATURES

**There is no target set for the result indicator R.34 on landscape elements.**



REDUCING THE SALES OF ANTIMICROBIALS IN ANIMAL FARMING AND AQUACULTURE BY 50%

**There is no target set for the result indicator R.43 on limiting the use of antimicrobial substances.**

In general, animal welfare laws in Sweden are stricter than the EU standards, and Sweden already has a very low use of antimicrobials in animal farming and aquaculture. The possibility of decreasing antimicrobials sales from an already low level is hard to estimate. Even so, the CSP supports cooperation activities and skills development that improves animal welfare and infection control and examines alternative animal husbandry systems. It also provides an ecoscheme on animal welfare.

■ Nevertheless, the CSP measures will not help counteract the growing sizes of farms, and the general “industrialisation” of the animal farming system.



FAIR WORKING CONDITIONS FOR FARMWORKERS (E.G. SOCIAL CONDITIONALITY)

The measures proposed are not innovative in terms of fair working conditions and thus do not ensure fair working conditions for farmworkers.



IMPROVING THE ECONOMIC SITUATION OF SMALL-SCALE FARMERS AND PRODUCERS IN MARGINALISED AREAS

0%

**The target for result indicator R.6 on the redistribution to smaller farms is 0%.**

The CSP proposes regular income and structural support to young farmers, for enterprise creation, or for diversification and food chain development. However, the area-based support system clearly benefits large-scale farmers and concerns only farmers owning and managing land. Support for young farmers is needed but should be coupled with measures that challenge current structures on a higher level, rather than only being paid out to individuals according to farm size. The innovation and cooperation support might benefit smaller and non-conventional agriculture. However, these measures are most likely not powerful enough to achieve real diversification among farmers and farming systems.

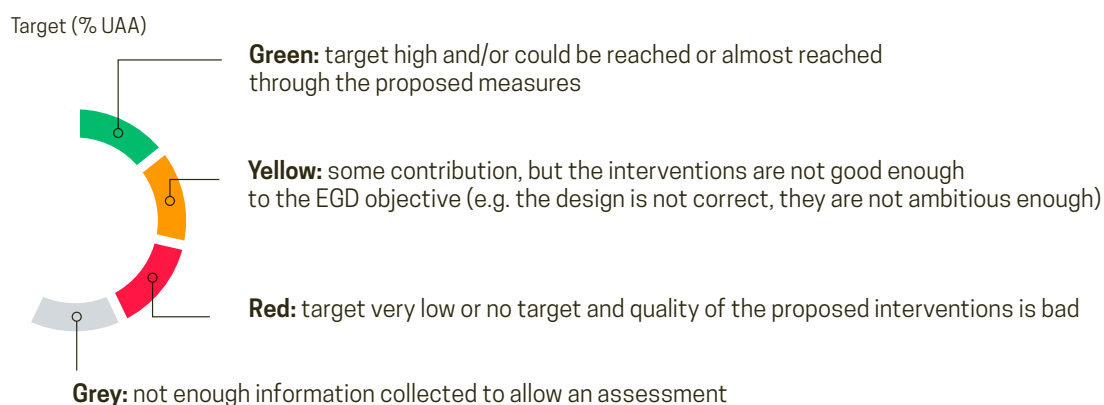
The CSP also proposes important measures in favour of fruit and vegetable production, bee-keeping, animal husbandry with endangered livestock breeds, and cattle production on marginal land, which will have a positive impact on small-scale producers.

■ The compensatory support measure proposed in the CSP may have a similar effect. However, they seem inadequate since most of the Swedish CAP budget is still supporting large-scale conventional agriculture. The focus on small-scale producers and producers in marginalised areas is far from enough to enable a more diverse, resilient and sustainable food system.

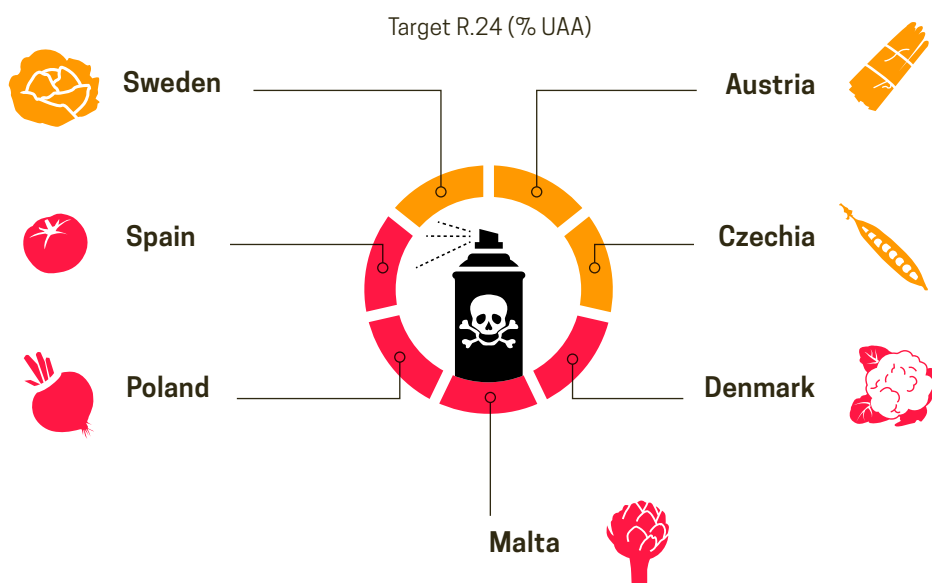
“  
The area-based support system clearly benefits large-scale farmers and concerns only farmers owning and managing land.”

# SUMMING UP: OVERVIEW OF NATIONAL AMBITION

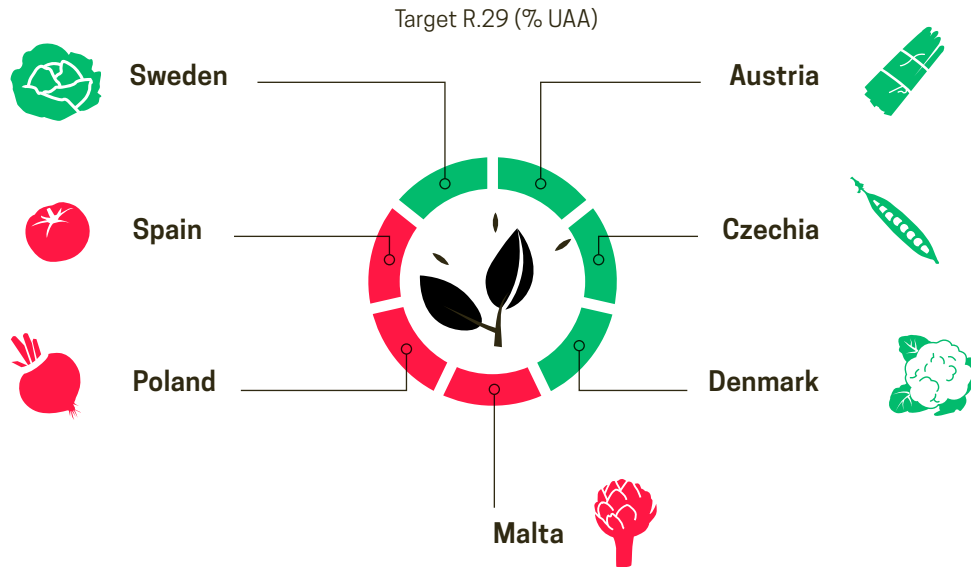
**Targets on the result indicators relating to each Green Deal objective, along with an assessment of the likelihood of reaching that objective (based on both the quality and quantity of the measures proposed).**



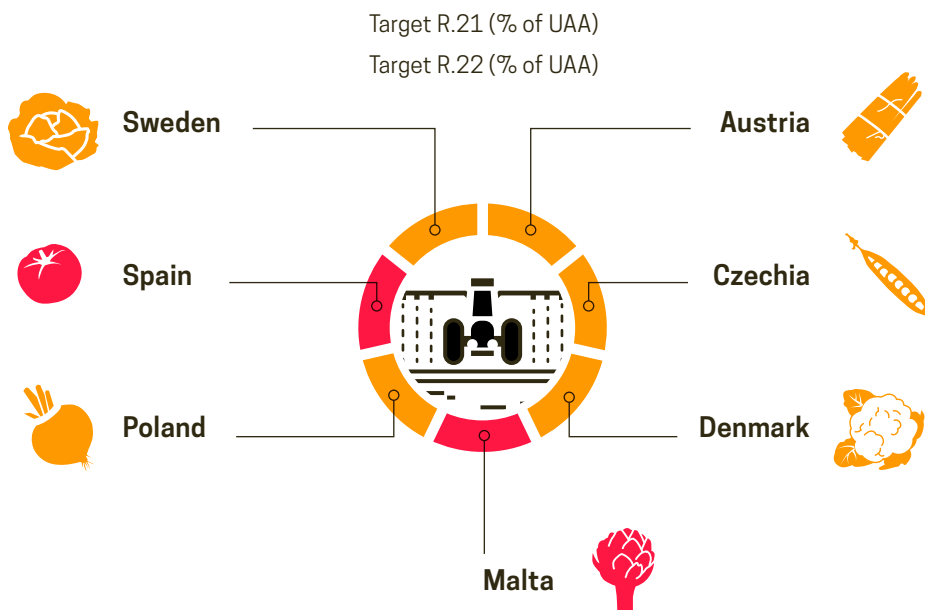
**Reducing the overall use and risk of chemical pesticides by 50%**



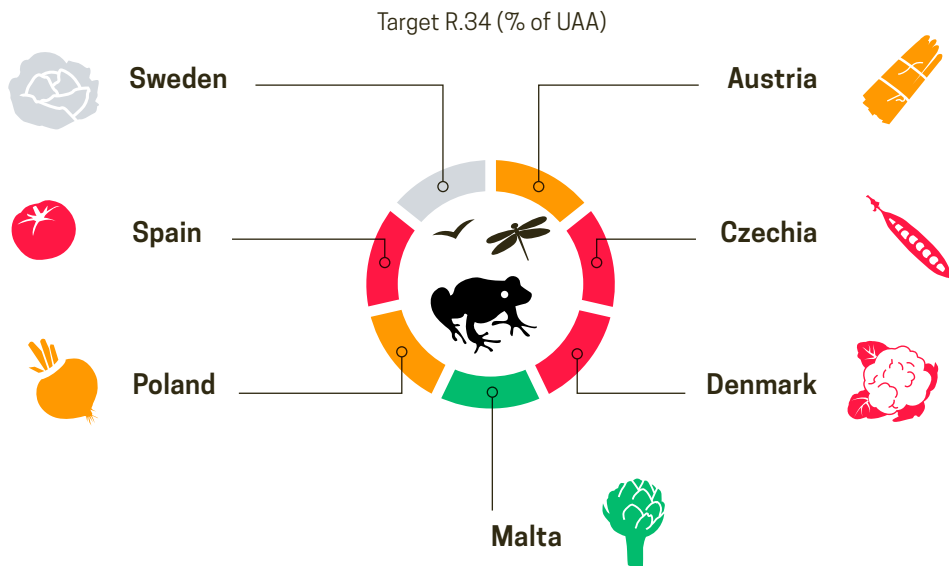
## Farming **25%** of the EU's agricultural land organically



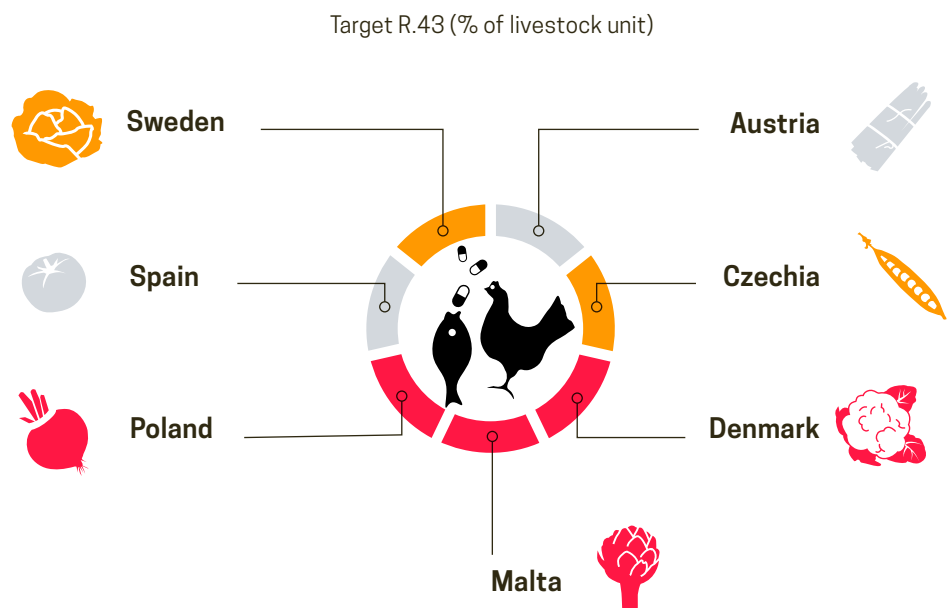
## Reducing nutrient losses by at least **50%** (excess of especially nitrogen and phosphorus in the environment) and the use of fertilisers by **20%**



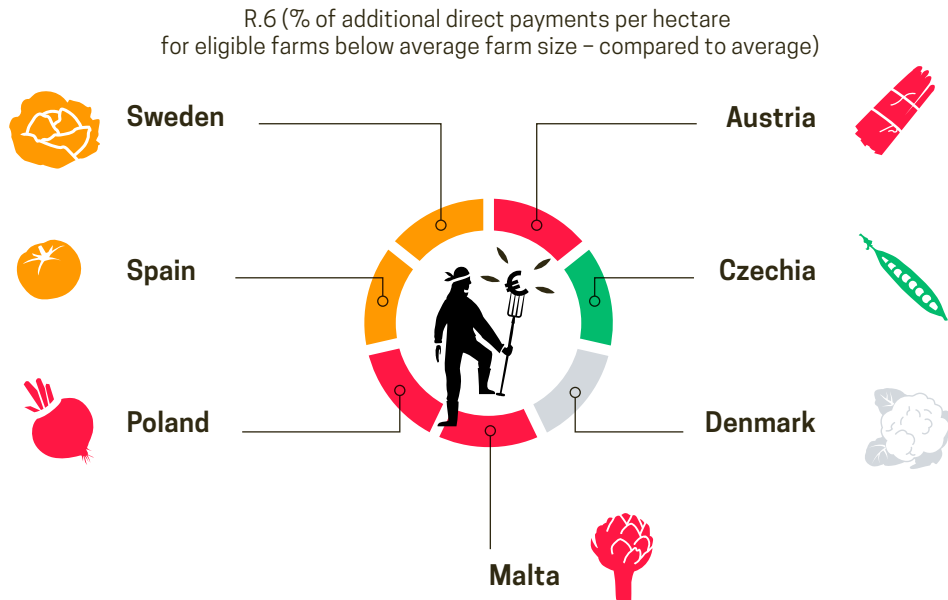
## Bringing back at least **10%** of agricultural area under high-diversity landscape features



## Reducing the sales of antimicrobials in animal farming and aquaculture by **50%**

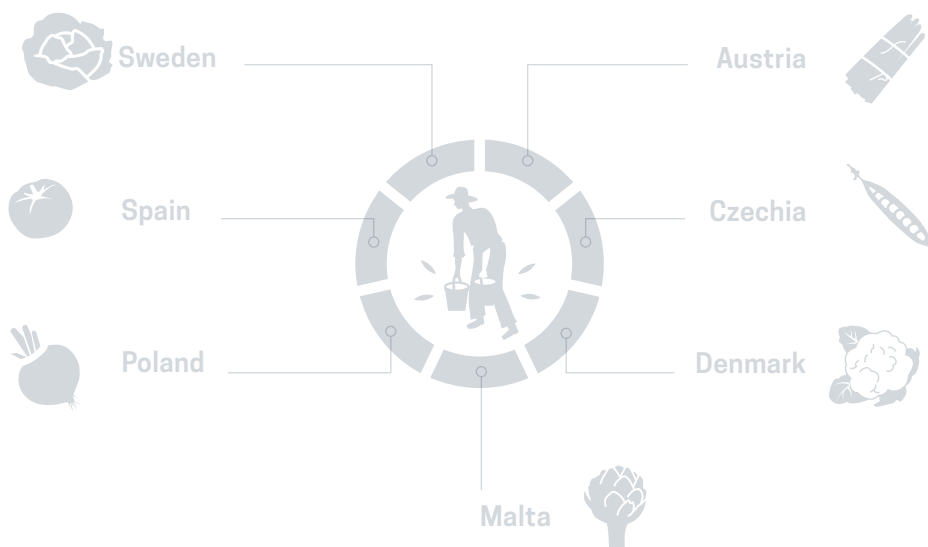


## Improving the economic situation of small-scale and producers in marginalised areas



## Fair working conditions for farmworkers (social conditionality etc.)

None of the Strategic Plans studied for this report had enough information on this objective to allow an assessment



# CONCLUSION

**This report assessed the CAP National Strategic Plans of seven member States in relation to the European Green Deal targets and support to small-scale farmers and producers. According to the available information we collected, the following conclusions can be drawn:**

To what extent are the CAP Strategic Plans contributing to the European Green Deal targets?

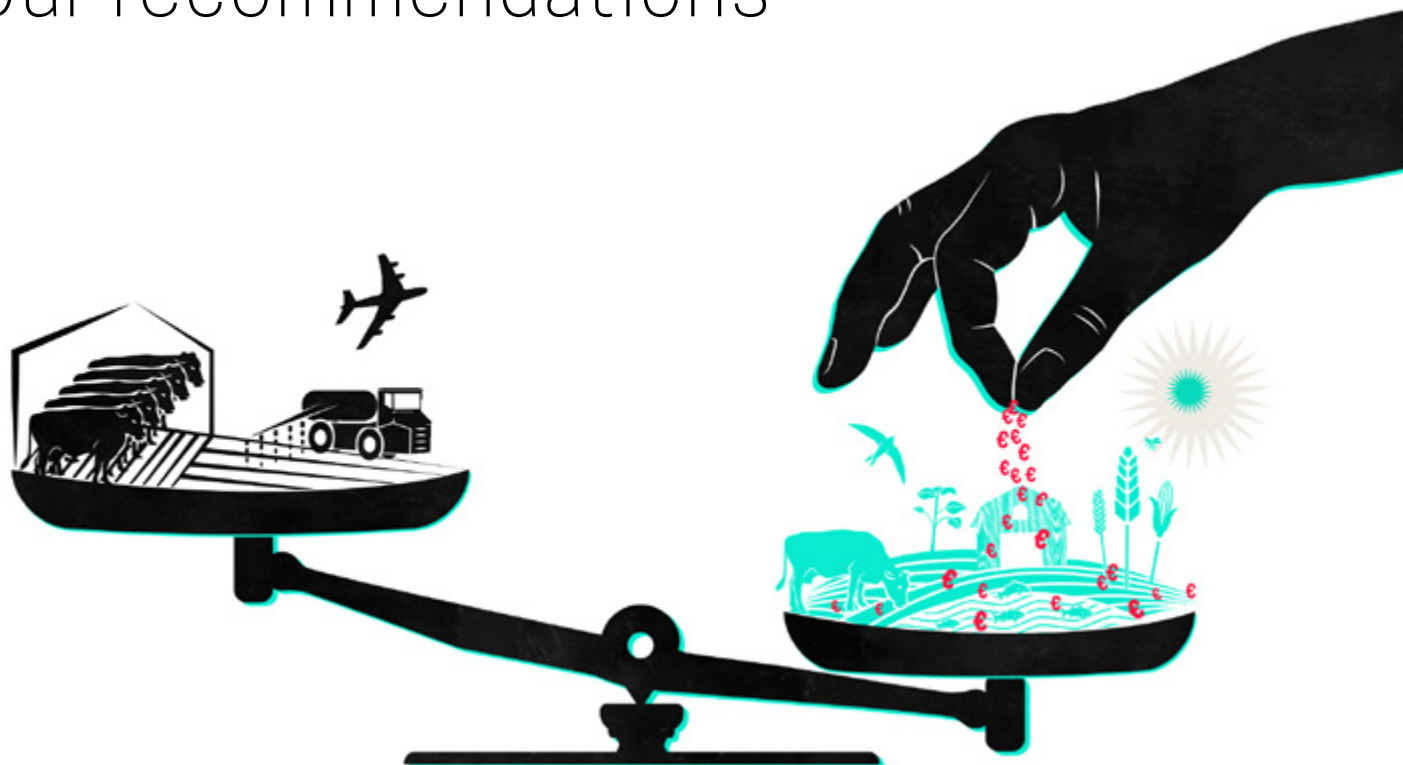
- Regarding the Green Deal targets for agriculture, the overall picture suggests that most of the CAP Strategic Plans will not make a significant contribution to meeting the targets.
- The only Green Deal targets that are likely to be met or almost met are organic agriculture in Austria (although Denmark, Sweden and Czech Republic may come close), the reduction of nutrient losses in Poland, and landscape features for Malta. Even there, it must be noted that the potential contribution of the CAP should not necessarily be credited for achieving these targets, as in some cases it would rather be due to already existing trends.
- Action appears to be particularly lacking on pesticide and fertiliser reduction, where none of the CAP plans assessed will make a significant contribution to the target.
- Of the Member States examined, Spain appears to have set particularly low targets for most of the Green Deal objectives.
- Overall, as pointed out, there is difficulty in interpreting the result indicators in relation to the delivery of the EGD targets. The impact indicators have a closer link to the EGD targets, but Member States do not have to set targets for these. A big disparity between Member States can be observed in the targets they set for the result indicators, but a relatively high target does not necessarily mean a great ambition. Whilst it indicates a high area coverage of measures, it does not say anything about the stringency or effectiveness of those measures. Often there appears to be a lack of supporting information on the quality of the schemes proposed and how much they will deliver e.g. what percentage of pesticide reduction will be achieved by a given scheme.
- Not included in the report: whilst for most targets in most Member States the CAP is likely to be the biggest contributor to the agriculture-related EGD targets, this report has not assessed the action towards the EGD targets that could be supported outside the CAP, such as: national laws, State Aids, Cohesion Funding and recovery funds. The report also has not assessed the extent of harmful subsidies such as support for industrial livestock, or measures that fund intensification (e.g. machinery, animal housing), which are working against the delivery of the EGD targets.

To what extent are the CAP Strategic Plans supporting small-scale farmers and fair working conditions?

There are very few mentions of fair working conditions in the CSPs analysed. According to an overview published by the European Commission<sup>20</sup>, most Member States chose to implement the 'social conditionality' in 2025, apart from two who will apply it in 2023 and two who will do so in 2024 (this includes Spain).

Likewise, support to small-scale farmers is far from a priority in the CSPs assessed. Measures are sometimes proposed, but it is difficult to make an assessment. Czech Republic seems to perform the best with regards to this objective.

# Our recommendations



It is clear from the CSPs analysed that they are lacking significant action on both the EGD targets to 2030 relating to agriculture and on support to small farmers and farm workers. As the next CAP will run to 2027, it is therefore recommended that:

- **Far more action should be taken in all Member States' CSPs on virtually all the EGD targets.** The European Commission needs to hold Member States accountable for proposing much more ambitious interventions to deliver on the needs for climate, environment and small farmers in their Member States. CAP tools should be used to enable farmers' transition towards agroecological practices and support those already thriving in it.
- **The European Commission must take a much closer look at coupled support and other harmful subsidies** in Member State CAP plans that undermine the EGD targets and contribute to ongoing reliance on feed and external inputs.

- Following the entry into force of the new CAP in 2023, Member States can amend their CSPs once a year. **While only ambitious plans must be approved from the outset, this process of revision should be used to further improve the CSPs and correct interventions that are shown not to be delivering.**

To have a chance of achieving the Green Deal targets, Member States must go much further than what is currently proposed in their Strategic Plans and make use of the CAP budget to transition towards more sustainable and fairer food systems based on food sovereignty and agroecology. Otherwise the objectives of the Farm to Fork and Biodiversity Strategy will be nothing more than empty promises.

20 <https://data.consilium.europa.eu/doc/document/ST-7022-2022-INIT/en/pdf>

21 As set out in the Farm to Fork and Biodiversity Strategies.

22 This is the language of the Commission, although there is no such thing as a sustainable use of pesticides.

# ANNEX 1

## Methodology

Surveys were sent to seven national partners in Austria, the Czech Republic, Denmark, Malta, Poland, Spain and Sweden in order to collect information about the CAP tools used to address eight of the Farm to Fork and Biodiversity Strategy objectives:

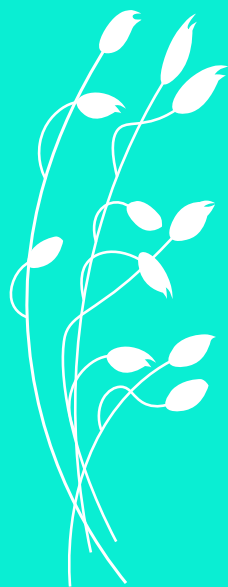
- Reducing the overall use and risk of chemical pesticides by 50%;
- Farming 25% of the EU's agricultural land organically;
- Reducing nutrient losses by at least 50% (excess of especially nitrogen and phosphorus in the environment);
- Reducing the use of fertilisers by 20%;
- Reducing the sales of antimicrobials in animal farming and aquaculture by 50%;
- Fair working conditions for farm workers (social conditionality etc.);
- Bringing back at least 10% of agricultural area under high-diversity landscape features;
- Improving the economic situation of especially small-scale farmers and producers in marginalised areas.

The information has been collected and then summarised per country and per objective.

The remainder of the report synthesises the information for individual Member States through:

- A table that ranks the ambition of Member States in their CAP Plans by objective: green indicates that the country will most likely meet or come close to the objective; yellow indicates a mixed result, either because the objective is ambitious but not accompanied by adequate measures, or because the objective is low but accompanied by interesting or better measures than before; red indicates that the MS is not addressing the problem at all; grey indicates that the information collected was not good enough to make an assessment.
- A summary stating to what extent are the CAP plans contributing to the EGD targets, with the environmental ones on one hand and the social ones on the other hand.
- A set of recommendations for the European Commission and Member States in the final stage of the approval process of the CSPs.





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