

Mr. Franz Fischler
Member of the Commission
Commission of the European Union
Rue de la Loi, 130
L130 08/188
1040 Brussels

Brussels, 15 September 2003

Subject: cross-compliance under the reformed Common Agricultural Policy (CAP)

Dear Mr Fischler,

In June 2003 the Council of Ministers agreed to make CAP payments conditional in respect of environmental, health and animal welfare requirements (compulsory Cross Compliance). Although the final list of statutory management requirements has shrunk considerably, and excludes some important pieces of legislation (such as the Water Framework Directive), we are still convinced it will lead to real progress in water pollution, water shortages, soil erosion, habitat loss, wildlife decline, food quality and security and the welfare of farm animals. However, in addition we believe that, in future, all subsidy payments should be coupled to minimal requirements for environment, nature, landscape, animal welfare and food quality and security, to be defined as Good Agricultural Practice, and that all legislation referring to these performances should be part of the statutory management requirements under Cross Compliance for all farmers.

In order to ensure that the proposed framework for Cross Compliance will still make a difference it is important that it will be correctly implemented and enforced by Member States. For that reason, it was agreed that the Commission, in collaboration with Member States, would establish a document on the use of indicators corresponding to the statutory requirements. We support the use of indicators if they represent a tool for better enforcement. An appropriate selection of indicators, relevant for the region, will be key in ensuring real benefit for the environment, health and animal welfare. Therefore, as a group of NGOs we ask the European Commission to organise a stakeholders' meeting to inform us on the procedure and the timeframe, and to provide us with the opportunity to give some input, as we believe that the Commission and the Member States should consult the interested parties.

We look forward to your reply.

Yours sincerely,

Eurogroup for Animal Welfare
European Environmental Bureau
Friends of the Earth Europe
WWF
Coordination Paysanne Européenne

CC: David Byrne, Margot Wallström, Bruno Buffaria, Martin Scheele, Tomas Garcia Azcarate



CPE

Annex: Parties to be included for consultation about defining application of Cross Compliance and indicators

Please note that the list below is not meant to be complete.

Commission

- * DG Agriculture
- * DG Environment
- * DG Health and Consumer Protection for health and Animal welfare indicators

NGOs

- * Aprodev
- * BirdLife International
- * Coordination Paysanne Europeenne
- * Eurocoop
- * Eurogroup for Animal Welfare
- * European Consumers Organisation
- * European Public Health Alliance
- * European Environmental Bureau
- * Friends of the Earth Europe
- * International Cooperation for Development and Solidarity
- * IUCN
- * Oxfam International
- * WWF