



Dr Franz Fischler
Commissioner for Agriculture and Rural Development
European Commission
Rue de la Loi, 200
1049 Brussels

RE: Environmental integration in Rural Development Regulation must be strengthened not weakened

Brussels, 1 July 2004

Dear Commissioner Fischler,

We appreciated the member of your cabinet Oliver Drewes being available to meet us and other environmental NGOs yesterday to discuss the preparations for the Rural Development Regulation. From the meeting we understand that many issues concerning environmental integration are still being discussed. Therefore we would like to re-emphasise our main concerns about some of the options currently in negotiation.

We recognise the progress made by the European Commission in recent years with respect to strengthening the second pillar and environmental integration into the CAP. The second pillar has the potential to play a key role in the implementation of the European environmental objectives (as defined in the conclusions of the European Council in Gothenburg in 2001, the Water Framework Directive, Natura 2000 etc).

However, with the information we have obtained about the new draft RDR we fear that its previous achievements may be reversed and that environmental objectives will not be met.

Our main concerns are as follows:

1. Financial restrictions on the 'land management axis'

Obliging the Member States to spend a minimum of 20% of funding on each axis in the period 2007-13 would reduce financial allocations for the 'land management axis' in six Member States (UK, Austria, Finland, Ireland, Czech Republic, Luxembourg) compared to the current period. Countries should be allowed to retain more than 60% expenditure for this axis if they wish to do so.

Further strengthening rather than restricting the 'land management axis' is crucial for meeting the EU's environmental objectives. Therefore we propose to earmark funding for the 'land management axis' only.

2. Potential reduction of environmental standards

Several Member States have defined a useful set of standards for Good Farming Practice. We acknowledge the need for simplification, however replacing Good Farming Practice with cross-compliance would lead to a reduction of environmental standards.

3. Monitoring of environmental objectives

Increased subsidiarity gives more flexibility for Member States to tailor their programmes to local needs. The EEB and Friends of the Earth Europe, however, insist that this cannot go without increased monitoring to ensure that environmental objectives are sufficiently addressed and achieved.

4. Consultation of environmental stakeholders

Involvement of environmental stakeholders in the development of RD plans is essential. According to our information, the current draft seems to suggest that while socio-economic interest groups must be consulted, environmental stakeholders only need to be consulted 'as deemed appropriate' by Member States.

5. Clear environmental objectives needed within the new Regulation

The Regulation must include the strategic environmental objectives that RDR spending should support and require Member States to address them properly. For instance, the RDR should explicitly support

the Natura 2000 network, the objective of halting the loss of biodiversity by 2010 and the implementation of the Water Framework Directive in order to achieve good water status by 2015.

FoEE and the EEB urge you to continue your commitment to environmental integration by addressing these issues in the new RDR and ensure that no weakening of existing environmental integration will take place.

We hope that you will consider our comments as a constructive contribution to improve the effectiveness and integration of EU policies. We would welcome further opportunities to discuss these issues with you and senior officials in DG Agriculture.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'John Hontelez', with a long horizontal stroke extending to the right.

John Hontelez
Secretary General
European Environmental Bureau

A handwritten signature in black ink, appearing to be 'Martin Rocholl', written in a cursive style.

Martin Rocholl
Director, Friends of the Earth Europe

CC: Nikosforos Sivenas, Rob Peeters, Martin Scheele, Andreas Lillig