



Confédération européenne des ONG
d'urgence et de développement

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NW	Handicap International
NP	Hungary: HAND
NW	IPPF European Network
NW	Islamic Relief Worldwide
NP	Ireland: Dochas
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NP	Latvia: Lapas
NP	"LU" Lithuanian development NGO umbrella
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NP	Netherlands: Partos
NW	Oxfam International
NW	Plan International
NP	Poland: Grupa Zagranica
NP	Portugal: Plataforma ONGD
NP	Romania: FOND
NW	Save the Children International
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NP	Slovenia: SLOGA
NW	Solidar
NP	Spain: CoNgDe
NP	CONCORD Sweden
NW	Terres des hommes IF
NP	United Kingdom: BOND
NW	World Vision International
AS	World Wide Fund for Nature (WWF)
NP	National Platform
NW	Network
AS	Associate member

To the attention of AGRI Lead Rapporteurs on CAP Reform 2013:
MEP Luis Manuel COPOULAS SANTOS, MEP Michel DANTIN, MEP Giovanni LA VIA

Cc : AGRI Shadow Rapporteurs:

MEP John Stuart AGNEW, MEP Richard ASHWORTH, MEP José BOVÉ, MEP Bas EICKHOUT, MEP Iratxe GARCÍA PÉREZ, MEP Elisabeth KÖSTINGER, MEP Patrick LE HYARIC, MEP Georges LYON, MEP Mariya GABRIEL, MEP James NICHOLSON, MEP Wojciech Michal OLEJNICZAK, MEP Marit PAULSEN, MEP Britta REIMERS, MEP Alfred RUBIKS, MEP Giancarlo SCOTTÁ, MEP Alyn SMITH, MEP Janusz WOJCIECHOWSKI

DEVE CAP rapporteur: MEP Birgit SCHNIEBER JASTRAM

EP Standing Rapporteur on PCD: MEP Charles GOERENS

Brussels, 23 October 2012

Dear lead rapporteurs on the EU CAP reform 2013,

The CAP has multiple direct and indirect effects on the food security situation in developing countries. As the biggest importer and exporter of agricultural goods, the EU influences trade flows, world market prices and supply and demand at global scale. The future of the European agricultural production patterns will decide Europe's reliance and dependence on virtual land and water in developing countries, as is the case, for example, with protein feed import. This view has been expressed by a wide range of civil society sectors from environmental, developmental, farmers, health, and animal welfare organizations as illustrated in the [cartoon and message](#) published last April.

Following the Lisbon Treaty, the European Parliament has full co-legislative powers on the CAP reform. The four CAP Opinions in the Development Committee have been voted on unanimously in June and are available to you¹. While negotiations on compromise agreements have started, we are learning that the rapporteur of the Development Committee is not part of these negotiations. Following up on our letter from 13 February, we, CONCORD, the European NGO confederation for Relief and Development, which

¹ [DEVE opinion direct payments](#); [DEVE opinion CMO](#); [DEVE opinion EAFRD](#); [DEVE opinion horizontal regulation](#)

CONCORD is the European NGO confederation for Relief and Development. Its 27 national associations, 18 international networks and 2 associate members represent 1,800 NGOs which are supported by millions of citizens across Europe. CONCORD leads reflection and political actions and regularly engages in dialogue with the European institutions and other civil society organisations. At global level, CONCORD is actively involved in the [Open Forum for CSO Development effectiveness](#), the [Beyond 2015](#) campaign, the [International Forum of NGO platforms](#) and [BetterAid](#). Find out more about CONCORD on www.concordeurope.org.

represents 1,800 NGOs, are urging you to demonstrate that the European Parliament takes development objectives in the CAP into account, in compliance with Art 208 TFEU.

Key issues that we urge you to include in the compromise amendments:

1. Obligations for Policy Coherence for Development: Article 208 (2) TFEU on Policy Coherence for Development (PCD) requires the EU to demonstrate that it has taken development objectives in the CAP into account. Without monitoring the likely effect of the CAP on developing countries, and thereby subjecting it to sound ex ante impact assessments and ex post monitoring, it will be impossible for the EU to fulfil its obligation under Article 208 (2). Monitoring should be accompanied by a mechanism enabling small scale farmers and concerned groups in developing countries to raise their complaints when their lives, rights and livelihoods have been (or are threatened to be) negatively affected by the implementation of the CAP.

Therefore, we urge you to support the following amendments:

Relating to PCD reference:

- [Amendments 1 and 4 in the DEVE opinion on the direct payments regulation](#)
- [Amendment 1 in the DEVE opinion on the horizontal regulation](#)
- [Amendments 1 and 6 in the DEVE opinion on the EAFRD regulation](#)
- [Amendments 1, 5, 8, and 11 in the DEVE opinion on the CMO regulation](#)
- [Amendments 117, 118, and 2188 to the direct payments regulation](#)
- [Amendments 435 and 535 to the CMO regulation](#)
- [Amendments 103 and 104 to the horizontal regulation](#)

Relating to Monitoring, impact assessments and complaint mechanism:

- [Amendments 2 and 4 in the DEVE opinion on the horizontal regulation](#)
- [Amendments 11 and 12 in the DEVE opinion on the CMO regulation](#)
- [Amendments 172, 661, 662, 672, 673, 674, 675, 677, and 678 to the horizontal regulation](#)

2. Export subsidies, though decreasing in scope in terms of both finance and number of recipient goods, constitute a severe obstacle to developing countries' ability to compete. They should be totally phased out.

Therefore, we urge you to support the following amendments:

- [Amendment 535 to the CMO regulation](#)
- [DEVE's amendment 4 and 6 to the CMO regulation](#)
- [All amendments deleting articles 133 to 141 of the CMO regulation.](#)

3. The EU's policy and dependence on protein plant imports has negative environmental and social impacts in exporting developing countries. Promoting the growing of leguminous crops in Europe could help reduce these impacts, mitigate climate change and positively contribute to biodiversity and soil fertility.

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Therefore, we urge you to support the following amendments:

- [Amendments 248, 251, 265, 1304, and 1342 and DEVE's amendments 2 and 5 to the direct payments regulation](#)
- [Amendment 1289 and DEVE's amendment 7 to the EAFRD regulation](#)

4. Agricultural research policies should focus on the multi-functionality of agriculture and should build on the conclusions of the IAASTD report. Synergies with local development actors in developing countries and decentralized participatory research on agro-ecology that can contribute to poverty eradication should be encouraged.

Therefore, we urge you to support the following amendments:

- [Amendments 1, 2, 4, 5, 6, 12, 13 in the DEVE opinion on the EAFRD regulation](#)
- [Amendments 175, 193 and 194 in the DEVE opinion on the EAFRD regulation](#)

5. Global civil society cooperation on rural development should be enhanced by taking advantage of possible synergies and project collaboration opportunities in linking CAP rural development instruments and agricultural development policy instruments, including European smallholder farmers, non-governmental organisations in the development sector and farmers' organizations as well as local authorities in developing countries.

Therefore, we urge you to support the following amendments:

- [Amendments 3, 4, 8, 9, 10, 11, and 12 in the DEVE opinion on the EAFRD regulation](#)

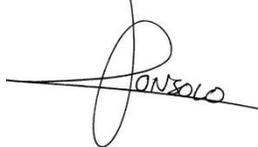
We urge you to make sure that the above-mentioned amendments are included in the compromise amendments. Of particular importance is the need for regular and independent monitoring of the external impact of the CAP, which must become an inbuilt part of the CAP.

The future of the EU CAP reform is a societal matter that concerns us all. It is about the future of the food we want to eat; it is about our relation to a planet on which we depend, and the access to the global commons, which must be available for all, in particular poor people in the South.

We urge you to ensure that European agriculture is responding to these concerns of European global citizens.

Yours sincerely,

Olivier Consolo
Director of CONCORD Europe



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