

Brussels, 19 December 2017
European Commissioner for International Cooperation and Development
Mr Neven Mimica
Rue de la Loi 170
1000 Bruxelles

Copy: European Commissioner for Agriculture and Rural Development
Mr Phil Hogan

CONCORD a.i.s.b.l.
Rue de l'industrie 10
B - 1000 Brussels

Subject: Open letter on the reform of the Common Agriculture Policy

Dear Commissioner,

We are writing to you in reaction to the Commission Communication on The future of Food and Farming, dated 29 November 2017.

Engaging in a transition towards sustainable food consumption and production is a major challenge for Europe under the SDGs. The upcoming reform of the Common Agriculture Policy (CAP) offers a unique opportunity to make that happen, to the benefit of farmers and citizens in Europe and globally. However, the recently released Commission's proposal on the future of food and farming falls short of putting forward a transformative agricultural policy able to address today's global challenges, and to live up to the EU and member states' commitments on climate mitigation, biodiversity and sustainable development.

CONCORD replied earlier this year to the public consultation on the modernisation of the CAP, highlighting the negative impact of the EU's agriculture policy on small scale food producers in developing countries. Initially, we welcomed the fact that the Communication acknowledges that the CAP "has global implications and linkages", but we cannot find support for the Commission's claim in the final Communication that "the CAP is and will continue to be coherent with the EU development policy".

The Communication indicates that "further liberalisation of trade and increased participation in global value chains" will allow people to be fed outside Europe. However, hunger is not due to a lack of availability of food, but to poverty which translates in a lack of resources to produce or access food. Also, overproduction in Europe over the last decades has not alleviated hunger. The new Consensus for Development states that "[s]upport to smallholders, including family farmers and pastoralists, remains of central importance, contributing substantially to food security and to the fight against soil erosion and biodiversity loss, while providing jobs [...]. The EU and member states will promote the creation of farmers' organisations and cooperatives to address, among other things, better

productivity of family farms, land use rights and traditional farmer-based seed systems”. Nothing in the Consensus is about promoting massive exports of European agri-food products to developing countries.

While the Communication rightly acknowledges that “specific agriculture sectors cannot withstand full trade liberalisation and unfettered competition with imports”, and that the sensitivity of products needs to be duly reflected in trade negotiations, this is paradoxically only flagged for the EU’s own farm sector. The fact that such impacts are also felt in developing countries is ignored.

Agricultural intensification combined with the growing homogenization of the global food system and unprecedented levels of power concentration in the food supply chain is further exacerbating food security challenges. We call for a transition from monoculture-based and high external input agriculture towards greater support for agro-ecological practices (see [CONCORD briefing](#)), which are now on the agenda of the Committee on World Food Security and the FAO. There is an explicit commitment by the EU and its Member States to “support agro-ecological practices and actions” in the new Consensus for Development.

We deplore that the CAP Communication does not address the external social and environmental impacts of that policy. The concerns highlighted in our [submission](#) on the CAP consultation would necessitate such an approach.

- The “*further liberalisation of trade*” which aims to “*allow the EU agrifood sector to develop exports*” (p.26) creates unfair competition for small-scale food producers in developing countries. The successive CAP reforms were based on the definition of dumping whereby there is no dumping provided that products are exported at world prices. The continued domestic support in the EU, now mainly through direct payments, led the EU to export at prices much lower than the EU average production costs without subsidies.
- The Communication does not tackle EU dependence on plant protein imports sufficiently nor makes any suggestions on how to move towards more sustainable meat consumption. It seems to imply that the EU could increase export of meat across the world to respond, “to growing middle-class demand worldwide, as well as dietary changes”, without addressing the negative environmental and social impacts in countries massively exporting inputs for animal fodder/feed in Europe.
- On migration, the proposal that “*knowledge and know-how gained from the CAP-supported projects should be used to develop employment opportunities and revenues generating activities in regions of origin (...) of migrants*” (p. 27) is not considering the lack of policy space and resources to address the root causes of poverty and food insecurity in developing countries. The impact of various agriculture models on migration should be better explored. The proposal that « the CAP could help integrate legal migrants » raises questions, since many

undocumented migrants are exploited, sometimes undergoing forced labour, in European agriculture.

We therefore urge you to uphold the principle of Policy Coherence for Sustainable Development by ensuring that the external impacts of the CAP are taken into account in the framework of the ongoing reform. This could be done by commissioning a study or appointing a task force or a group of experts that would include representatives of farmers and pastoralists organisations from developing countries, to look at the CAP's external impact on the right to food, access to natural resources, small-scale food producers' livelihoods with a gender lens, and on the resilience of farmers and food systems in developing countries. Their findings should be taken into account in the final policy proposal. We also call upon you to establish a robust mechanism to monitor ex-post the future CAP's external impacts as part of the upcoming reform that would allow affected communities to file complaints.

We thank you for your attention to this important issue.

Yours sincerely,



Johannes Trimmel
President of CONCORD Europe

CONCORD

European NGO confederation for relief and development

