

## EVALUATION OF THE EU COMMON AGRICULTURAL POLICY IMPACT ON BIODIVERSITY, SOIL AND WATER (NATURAL RESOURCES)

Fields marked with \* are mandatory.

### Introduction

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Land dedicated to farming and forestry covers about three quarters of the EU's land surface area. Agriculture and forestry play an important role in the management of natural resources while also being heavily dependent on them. Agricultural and forestry practices have an impact on soil quality, water quality and quantity, as well as biodiversity.

The important role of agriculture and forestry in managing natural resources is acknowledged and well reflected in the EU's Common Agricultural Policy (CAP), which includes, as one of its three general objectives, the sustainable management of natural resources and climate action. The prevention of soil erosion and improvement of soil management, water management (quantity, quality), restoring, preserving and enhancing biodiversity (landscape, habitats) constitute important elements of this general objective of the CAP.

This public consultation aims to gather information and feedback from stakeholders and the wider public in relation to the impact of the CAP on biodiversity, soil and water. It contributes to an upcoming Commission staff working document on the evaluation of the impact of the CAP with respect to natural resources, complementing the findings of the evaluation support studies on the impact of the CAP on [biodiversity](#) and [water](#), published on 27 March 2020, and the ongoing evaluation on the impact of the CAP on soil.

We invite you to contribute to this evaluation by replying to the questionnaire below, which should take around 30 minutes to complete.

When replying, please note that the survey relates to the present CAP, as implemented after the 2013 reform, through the so called 'basic regulations': [Regulation 1305/2013](#) (rural development), [Regulation 1306/2013](#) (horizontal issues), [Regulation 1307/2013](#) (direct payments) and [Regulation 1308/2013](#) (markets). The survey does not address the Commission proposal for the CAP post-2020 (COM(2018) 392 and COM(2018) 393 in particular).

Thank you for your valuable input!

### About you

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\* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

\* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority

- Trade union
- Other

\* First name

Oliver

\* Surname

LOEBEL

\* Email (this won't be published)

oliver.loebel@eureau.org

\* Organisation name

*255 character(s) maximum*

EurEau

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

*255 character(s) maximum*

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

39299129772-62

\* Country of origin

Please add your country of origin, or that of your organisation.

- |                                     |  |                                     |  |
|-------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan   | <input type="radio"/> Djibouti           | <input type="radio"/> Libya         | <input type="radio"/> Saint Martin                     |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica           | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon        |
| <input type="radio"/> Albania       | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania     | <input type="radio"/> Saint Vincent and the Grenadines |

- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom

- |  |                                  |   |  |
|--|----------------------------------|---|--|
| <input type="radio"/> Clipperton                       | <input type="radio"/> Jamaica    | <input type="radio"/> Peru  | <input type="radio"/> United States                        |
| <input type="radio"/> Cocos (Keeling) Islands          | <input type="radio"/> Japan      | <input type="radio"/> Philippines                                 | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia                         | <input type="radio"/> Jersey     | <input type="radio"/> Pitcairn Islands                            | <input type="radio"/> Uruguay                              |
| <input type="radio"/> Comoros                          | <input type="radio"/> Jordan     | <input type="radio"/> Poland                                      | <input type="radio"/> US Virgin Islands                    |
| <input type="radio"/> Congo                            | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal                                    | <input type="radio"/> Uzbekistan                           |
| <input type="radio"/> Cook Islands                     | <input type="radio"/> Kenya      | <input type="radio"/> Puerto Rico                                 | <input type="radio"/> Vanuatu                              |
| <input type="radio"/> Costa Rica                       | <input type="radio"/> Kiribati   | <input type="radio"/> Qatar                                       | <input type="radio"/> Vatican City                         |
| <input type="radio"/> Côte d'Ivoire                    | <input type="radio"/> Kosovo     | <input type="radio"/> Réunion                                     | <input type="radio"/> Venezuela                            |
| <input type="radio"/> Croatia                          | <input type="radio"/> Kuwait     | <input type="radio"/> Romania                                     | <input type="radio"/> Vietnam                              |
| <input type="radio"/> Cuba                             | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia                                      | <input type="radio"/> Wallis and Futuna                    |
| <input type="radio"/> Curaçao                          | <input type="radio"/> Laos       | <input type="radio"/> Rwanda                                      | <input type="radio"/> Western Sahara                       |
| <input type="radio"/> Cyprus                           | <input type="radio"/> Latvia     | <input type="radio"/> Saint Barthélemy                            | <input type="radio"/> Yemen                                |
| <input type="radio"/> Czechia                          | <input type="radio"/> Lebanon    | <input type="radio"/> Saint Helena Ascension and Tristan da Cunha | <input type="radio"/> Zambia                               |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho    | <input type="radio"/> Saint Kitts and Nevis                       | <input type="radio"/> Zimbabwe                             |
| <input type="radio"/> Denmark                          | <input type="radio"/> Liberia    | <input type="radio"/> Saint Lucia                                 |  |

\* Publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

**Anonymous**

Only your type of respondent, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

**Public**

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

I agree with the [personal data protection provisions](#)

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## The CAP's contribution to the sustainable management of natural resources

Farmers in the EU are obliged to respect a set of mandatory basic rules ([cross-compliance](#)), including **statutory management requirements** (SMR) and standards of **good agricultural and environmental conditions** (GAEC). SMRs are based on EU legislation outside the CAP (e.g. nitrates, birds and habitats, animal welfare) and are applicable to all farmers whether or not they receive CAP income support. GAEC standards stem from CAP legislation and are further specified by Member States. Receipt of income support and certain rural development support under the CAP is conditioned on the respect of both SMRs and GAECs.

Within CAP direct payment support, farmers receive a 'green direct payment' linked to adoption or maintenance of mandatory climate and environment-friendly agricultural (['greening'](#)) practices, notably crop diversification, maintaining permanent grassland and dedicating 5% of arable land to areas beneficial for biodiversity (ecological focus areas). Farmers who do not comply with greening receive reduced direct payments.

**Agri-environment-climate measures** ([AEEM](#)) are voluntary for farmers and other land managers and provide support for introducing or continuing to apply agricultural practices beneficial for the climate, the protection and improvement of the environment, biodiversity, landscape and its features and natural resources including soil and water.

The CAP also supports farmers in their conversion to and maintenance of [organic farming](#) methods and practices.

In addition, in the same context, the CAP supports farmers in [areas with natural constraints](#), those in Natura 2000 areas and in river basins under the Water Framework Directive who are subject to additional restrictions.

Moreover, a wide range of [rural development actions supported by the CAP](#), have a significant potential to deliver the benefits of sustainable farming practices (notably training and advice, investments, including in green infrastructure, innovation and cooperation) and to complement the forestry measures.

Finally, specific sectors, such as apiculture, wine and fruit and vegetables, are supported via [sectoral programmes](#), which can include some actions for sustainable management of natural resources.

## **INTRODUCTORY QUESTIONS**

1. To allow us to better understand your interest on agricultural, climate and environmental issues, please indicate the stakeholder category that best describes the area you represent (one answer possible):

- Agriculture (farming)

- Forestry, including agri-forestry
- Input producer (i.e. fertilizers, pesticides, seed, machinery)
- Food/beverage business, retail included
- Farm advisory services
- Other service providers and agricultural contractors
- Environmental protection
- Civil society
- Development of rural areas
- Other (\*)

(\*) If "other", please specify:

Drinking water suppliers
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2. In your opinion, to what extent does the current CAP contribute to the following environmental objectives of the EU?

	To a very large extent	To a large extent	To some extent	To a very small extent (*)	Not at all (*)	No opinion
Increasing efficiency in water use by agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving water quality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preventing soil erosion and improving soil management	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Restoring, preserving and enhancing biodiversity, habitats and landscapes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing greenhouse gas emissions from agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reducing ammonia emissions from agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fostering carbon conservation and sequestration in agriculture and forestry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Adapting to climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

(\*) If you replied "to a very small extent" or "not at all", please specify the reason:

*500 character(s) maximum*



Water use efficiency: Farmers are not encouraged to adapt to changing rain fall patters caused by climate change. Water intensive crops are grown in dry areas. Investments in unsustainable irrigation are continuing leading to over-abstraction of (ground)water resources.

Water quality: Pesticides and their metabolites and nitrate continue to be found in unacceptable levels in numerous drinking water resources leading to additional costly treatment requirements for drinking water suppliers.

3. Please indicate which are, in your opinion, the main drivers of succes in the implementation of the current CAP instruments and measures to contribute to sustainable management of natural resources (more than one answer possible):

- Linking CAP support to existing mandatory requirements set by non-CAP legislation as implemented in Member States (SMRs)
- Mandatory requirements stemming from CAP legislation further specified by Member States (GAECs)
- Mandatory requirements stemming from CAP legislation that are the same in all Member States (greening)
- Voluntary commitments (e.g. AECM, organic farming)
- Environmental investments aiming to improve management of natural resources
- A synergistic combination of CAP measures (mandatory and voluntary)
- The level of financial incentive
- Clear and targeted objectives of the CAP
- Eligibility and selection criteria to access CAP measures
- Advice (quality, independence) and knowledge transfer
- Innovative approaches in delivering environmental public goods (e.g. result based approach, collective actions)
- Measures targeted and tailored to local context/needs
- Other (\*)

(\*) If “other”, please specify:

*500 character(s) maximum*

4. Please indicate which are, in your opinion, the main factors in the implementation of the current CAP instruments and measures that limit their contribution to sustainable management of natural resources (more than one answer possible):

- Low ambition of the measures
- An insufficient budget allocation
- An insufficient level of financial incentives
- An insufficient synergy/coherence between measures
- Inadequate governance structures/coordination
- The risks (productivity, financial, administrative) linked to changing farming practices
- The complexity of adapting farming practices
- The costs of changing farming practices
- The lack/quality/independency of farm advice
- The diversity of situations and needs (non-adapted measures)
- Too restrictive eligibility and selection criteria
- Lack of targeting support towards clear objectives
- Too broad exemptions (i.e. sectors and areas excluded from requirements)
- Disproportionate administrative burden for beneficiaries (fear of excessive controls)
- Administrative complexity for beneficiaries to apply for measures
- Disproportionate administrative burden for administrations
- Delay in the payment of support
- Difficult eligibility criteria to benefit from measures and/or to access financing (grants, loans, etc.)
- Too frequent changes to the policy
- Other (\*)

(\*) If “other”, please specify:

*500 character(s) maximum*

Lack of effective national control and weak application of cross compliance

**EFFECTIVENESS**  
**(Have the objectives been met?)**

5. To what extent do the relevant CAP instruments and measures contribute to the sustainable management of **soil** resources?

	To a very large extent	To a large extent	To some extent	To a very small extent	Not at all	No opinion
Linking CAP support to compliance with specific non-CAP regulatory provisions (SMR)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices (GAEC) without financial support	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices with financial support (Greening)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agri-environment-climate voluntary commitments (AEEM)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Voluntary commitments for forestry (forest-environmental payments)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support to Organic farming	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to areas with natural constraints	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Natura 2000 and Water Framework Directive payments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment Support on farms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment Support for forestry (afforestation, agroforestry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Knowledge transfer and advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Sectoral Programmes for fruit and vegetables	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

6. To what extent do the relevant applicable CAP instruments and measures contribute to the sustainable management of **water** resources in terms of **water quantity**?

	To a very large extent	To a large extent	To some extent	To a very small extent	Not at all	No opinion

Linking CAP support to compliance with specific non-CAP regulatory provisions (SMR)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices (GAEC) without financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices with financial support (Greening)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agri-environment-climate voluntary commitments (AECM)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Voluntary commitments for forestry (forest-environmental payments)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Support to Organic farming	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to areas with natural constraints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Natura 2000 and Water Framework Directive payments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment Support on farms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment Support for forestry (afforestation, agroforestry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Knowledge transfer and advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cooperation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Sectoral Programmes for fruit and vegetables	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

7. To what extent do the relevant applicable CAP instruments and measures contribute to the sustainable management of water natural resources in terms of **water quality**?

	To a very large extent	To a large extent	To some extent	To a very small extent	Not at all	No opinion
Linking CAP support to compliance with specific non-CAP regulatory provisions (SMR)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices (GAEC) without financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices with financial support (Greening)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Agri-environment-climate voluntary commitments (AECM)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Voluntary commitments for forestry (forest-environmental payments)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to Organic farming	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to areas with natural constraints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Natura 2000 and Water Framework Directive payments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment Support on farms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment Support for forestry (afforestation, agroforestry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Knowledge transfer and advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cooperation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Sectoral Programmes for fruit and vegetables	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

8. To what extent do the relevant applicable CAP instruments and measures contribute to the sustainable management of **biodiversity**, habitats and landscapes?

	To a very large extent	To a large extent	To some extent	To a very small extent	Not at all	No opinion
Linking CAP support to compliance with specific non-CAP regulatory provisions (SMR)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices (GAEC) without financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory practices with financial support (Greening)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agri-environment-climate voluntary commitments (AECM)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Voluntary commitments for forestry (forest-environmental payments)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to Organic farming	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to areas with natural constraints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Natura 2000 and Water Framework Directive payments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investment Support on farms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-productive investment support (landscape features)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment Support for forestry (afforestation, agroforestry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Knowledge transfer and advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cooperation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Sectoral Programmes (apiculture, fruit and vegetables)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

9. In your opinion, does the implementation of [decoupled income support](#) (i.e. payments not linked to current production of specific commodities or livestock numbers or the use of specific factors of production) cause any unexpected or unintended (positive/negative) effects in terms of sustainable management of natural resources (one answer possible)?

- Positive effect (\*)
- Negative effect (\*)
- No effect
- Don't know

(\*) If "Positive effect" or "Negative effect", please specify which effects and why:

*500 character(s) maximum*

10. In your opinion, does the implementation of [voluntary coupled support](#) (i.e. payments linked to the production of specific products) cause any unexpected or unintended (positive/negative) effects in terms of sustainable management of natural resources (one answer possible)?

- Positive effect (\*)
- Negative effect (\*)
- No effect
- Don't know

(\*) If "Positive effect" or "Negative effect", please specify which effects and why:

500 character(s) maximum

11. In your opinion, does the implementation of sectoral programmes (other than those referred to in Questions 5 to 8) cause any unexpected or unintended (positive /negative) effects in terms of sustainable management of natural resources (one answer possible)?

- Positive effect (\*)
- Negative effect (\*)
- No effect
- Don't know

(\*) If "Positive effect" or "Negative effect", please specify which instrument, which effects and why:

500 character(s) maximum

12. In your opinion, does the implementation of any other CAP instrument cause any unexpected or unintended (positive/negative) effects in terms of sustainable management of natural resources (one answer possible)?

- Positive effect (\*)
- Negative effect (\*)
- No effect
- Don't know

(\*) If "Positive effect" or "Negative effect", please specify which instruments, which effects and why:

500 character(s) maximum

## **EFFICIENCY**

### **(Were the costs involved reasonable/proportionate?)**

13. To what extent do the relevant applicable CAP instruments and measures as implemented by the Member States for the sustainable management of natural resources generate the best possible results on management of natural resources with its available budget?

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	To a very large extent	To a large extent	To some extent	To a very small extent	Not at all	No opinion
Linking CAP support to compliance with specific non-CAP regulatory provisions (SMR)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mandatory practices (GAEC) without financial support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mandatory practices with financial support (Greening)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Voluntary commitments (AECM)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Voluntary commitments for forestry	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to Organic farming	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support to areas with natural constraints	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Natura 2000 and Water Framework Directive payments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment Support on farms	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Non-productive investment support (landscape features)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Investment Support for forestry (afforestation, agroforestry)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Knowledge transfer and advice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Sectoral Programmes (apiculture, fruit and vegetables)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

14. Please indicate which are, in your opinion, the main aspects of administrative cost/burden in the implementation of the current CAP instruments and measures to achieve the objectives relevant to sustainable management of natural resources. (More than one answer possible)

*between 1 and 8 choices*

- For beneficiaries: complexity to submit an aid application (time, knowledge, effort)
- For beneficiaries: too much time required to receive the payment after submitting the aid application



- For beneficiaries: too much time and effort required for administrative controls
- For beneficiaries: too frequent changes in the policy
- For administrations: complexity of management in the administrative system
- For administrations: complexity due to a decentralized administrative system (e.g. when applications or controls are managed at regional level)
- For administrations: too frequent changes in the policy
- Other (\*)

Please specify the instrument or measure you consider affected by the aspect(s) of your choice:

*500 character(s) maximum*

(\*) In case of 'other', please specify the administrative cost/burden you consider:

*500 character(s) maximum*

For drinking water suppliers: Due to weak CAP implementation, the cost of additional raw water treatment or other mitigation measures to guarantee safe and clean drinking water free from agricultural pollutants.

## COHERENCE

### (Do the applicable CAP instruments complement each other and/or EU funded actions under other policy areas?)

15. Do the various CAP instruments and measures deliver a coherent and complementary contribution to the sustainable management of natural resources (one answer possible)?

- To a very large extent
- To a large extent
- To some extent
- To a very small extent (\*)
- Not at all (\*)
- No opinion

(\*) If "To a very small extent" or "Not at all", please specify why and the instruments you refer to:

*500 character(s) maximum*

None of the instruments and measures consistently prevented eutrophication of, and pesticide release into (drinking) water resources in the EU. Antimicrobial substances from veterinary use continue to be found in many water bodies. Unsustainable irrigation practices were not prevented and erosion remains a problem in many parts of the EU.

16. To what extent do the applicable CAP instruments and measures, concerning sustainable management of natural resources, deliver a coherent and complementary contribution with overall EU environmental and climate change legislation and strategies?

	Fully coherent	Mostly coherent	Somewhat coherent	Incoherent	No opinion
<a href="#">7th Environment Action Programme to 2020</a>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<a href="#">Water Framework Directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<a href="#">Sewage Sludge Directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<a href="#">Floods Directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<a href="#">Nitrates Directive</a>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<a href="#">Sustainable Use of Pesticides Directive</a>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<a href="#">Habitats Directive</a> and <a href="#">Birds Directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">EU Biodiversity Strategy to 2020</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">Industrial Emissions Directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">Renewable Energy directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">Air quality directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">National Emission Ceilings Directive</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">Effort Sharing Decision</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Land Use, Land-Use Change and Forestry (LULUCF - <a href="#">Decision No 529 /2013/EU</a> )	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">EU strategy on adaptation to climate change</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

## RELEVANCE

**(Are the objectives of the relevant CAP instruments in line with actual needs?)**

17. Are the available CAP instruments and measures still relevant to respond to the actual needs in terms of sustainable management of **soil** within the EU (one answer possible)?

- Yes, very relevant
- Yes, but only somewhat relevant
- Not at all
- No opinion

18. Are the available CAP instruments and measures still relevant to respond to the actual needs in terms of sustainable management of **water use** within the EU (one answer possible)?

- Yes, very relevant
- Yes, but only somewhat relevant
- Not at all
- No opinion

19. Are the available CAP instruments and measures still relevant to respond to the actual needs in terms of sustainable management of **water quality** within the EU (one answer possible)?

- Yes, very relevant
- Yes, but only somewhat relevant
- Not at all
- No opinion

20. Are the available CAP instruments and measures still relevant to respond to the actual needs in terms of sustainable management of **biodiversity**, habitats and landscapes within the EU (one answer possible)?

- Yes, very relevant
- Yes, but only somewhat relevant
- Not at all
- No opinion

### **EU ADDED VALUE**

**(What is the additional value resulting from the EU intervention(s), compared to what could reasonably have been expected from Member States acting at national and/or regional level?)**

21. To what extent, do the relevant applicable CAP instruments and measures create EU added value with respect to sustainable management of natural resources (one answer possible)?

- To a very large extent
- To a large extent
- To some extent
- To a very small extent
- Not at all
- No opinion

22. In your opinion, what are the most essential benefits of the CAP in terms of sustainable management of natural resources that cannot be achieved by the Member States/sectors acting on their own?

*500 character(s) maximum*

Pollution, including that of water resources, and unsustainable water abstraction are cross-border problems and need to be tackled in a cross-border approach.  
 Unfair competition on the expense of the environment must be avoided.

### **Final comments and document upload**

23. In your opinion, do the following data sources and/or evaluations provide timely and sufficient information for monitoring and/or assessing the impact of the CAP on sustainable management of natural resources?

	Timely and sufficient	Timely but not sufficient	Sufficient but not timely	Neither timely nor sufficient	No opinion
<a href="#">CAP indicators</a> - dashboards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">CAP indicators</a> - context	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">CAP indicators</a> - full dataset	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">Evaluations on sustainability</a> (climate and environment)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<a href="#">Other evaluations</a>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

24. You may complement your answers to the questionnaire with further observations in the following text box.

*1000 character(s) maximum*

EurEau calls for a much stronger and effective integration of water protection goals (Water Framework Directive, Nitrate Directive, Drinking Water Directive) in the CAP instruments and a clear and well implemented linkage between these goals and financial incentives in the CAP.

The WFD River Basin Management Plans should set clear and verifiable requirements for farmers with a view to achieving good status water bodies.

Farmers should be held financially responsible if drinking water suppliers must costly add extra-treatment or take other remedial measures to remove excessive concentrations of nitrate, pesticides or antimicrobials from veterinary sources from raw water.

25. As an alternative to point 24, you may upload a document incorporating additional relevant observations and views regarding the subject. Please keep the contents of such a document short, concise and focused on the subject of the consultation. Unrelated contributions, such as general remarks on the wider CAP will not be taken into account.

Please note that the uploaded document will be published in its entirety alongside your response to the questionnaire, which remains the essential input to this public consultation. The document is optional and serves as additional background to better understand your position.

## Please upload your file

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

**3c56ad1d-d574-47f7-a5e1-518920c2dc73/EurEau\_position\_on\_Water\_and\_Agriculture.pdf**

Thanks for your participation.

## Contact

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