



Draft

Title: **Transitioning to sustainable and resilient farming systems in Europe**

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1 European farmers are under increasing pressure. Climate change, loss of
2 biodiversity, input dependencies and low profitability constitute critical
3 growing threats to farmers and European food production. Decades of ecologically
4 and economically unsustainable agricultural policy in the EU have not only
5 failed to build resilience to shocks but have also exacerbated the threats from
6 ecosystem degradation and failed to address the decline in farmers' economic
7 resilience, resulting from high input dependencies and large power asymmetries
8 in food value chains.

9 Europe has seen a steep decline in its number of farms and farmers. Between 2005
10 and 2020, it lost 37%, corresponding to 5.3 million farms. The largest subsidy
11 scheme, the area-based direct payments, continues to favour the largest farms,
12 with 20% of beneficiaries receiving 80% of the payments. These untargeted
13 payments contribute to locking farmers into a size rationalisation that both
14 promotes and forces the unsustainable expansion of production and specialisation
15 in order to achieve profitability. This often involves large investments and the
16 risk of sunken costs making it difficult to change direction. Farms of all
17 sizes should be able to live off their produce without having to repeatedly
18 expand or make expensive investments.

19 A substantial reduction in meat and dairy consumption is necessary for both
20 public health and for food systems to function within the planetary boundaries.
21 Despite this, EU policy has failed to rebalance European agriculture and diets
22 to become more plant based. Although 70% of arable land in the EU is dedicated
23 to feed production for animals, this still only covers 30% of the feed required
24 for current
25 levels of meat production. The remaining feed is imported, making meat
26 consumption and production also subject to vulnerable world markets. Comparing
27 sectors, 82% of subsidies from the CAP are directed towards animal-based
28 products (including subsidies for feed production). EU policy has also failed
29 animals and citizens' calls for higher welfare in animal farming with, among
30 others, outdated legislation for transport, slaughter and the confinement of
31 animals, especially by continuing to permit animals to be kept in cages.

32 Eco-schemes introduced in the EU Common Agricultural Policy reform 2023 to
33 incentivise sustainable farming practices were far from sufficient in both
34 design and implementation across the Member States. Similarly, the European
35 Court of Auditors recently raised concern about significant weaknesses in the
36 EU's strategy to support organic farming (ECA 2024), which has a high risk of
37 failing to reach the target of 25% of agricultural land to be under organic
38 production by 2030. Organic farming needs to be strengthened by supporting its
39 development across the entire sector, including downstream actors and incentives
40 for increased consumption. The agricultural sector must be part of the circular
41 economy, in all aspects of food production.

42 Synthetic pesticides continue to contaminate air, water and soil while driving
43 the decline in biodiversity. Yet binding targets to reduce the use and risk of
44 synthetic pesticides at Member State level are still absent. Extensive
45 investment, including funding and advisory services, in the uptake of already
46 existing alternatives to synthetic pesticides is necessary for the future of
47 European food production, as well as investment in further research into
48 integrated pest management.

49 Not investing fully in the transition to sustainable farming and food systems
50 will be very costly, already in the near future. Europe is the fastest warming
51 continent and agriculture is one of the most vulnerable sectors. Heatwaves,
52 droughts and excessive rainfall are already posing a substantial risk to food
53 production across Europe and are a critical risk in southern Europe (EEA, ECRA -
54 crop production). While 95% of the food we eat depends on soil ecosystems, 60-
55 70% of EU soils are considered unhealthy, posing the risk of

56 amplifying impacts from climate change, such as floods, desertification and
57 water shortages. Such risks will probably accelerate with further global
58 warming. Globally, temperatures in 2023 and 2024 have been in the order of 1.5
59 degrees above pre-industrial temperatures. Moreover, lower soil fertility is
60 increasing the need for fertilizer inputs, creating a vicious circle that must
61 be broken.

62 Yet, agriculture has significant potential for adaptation with multiple
63 beneficial resilience effects for entire communities and society as a whole, by
64 transitioning to low-input sustainable agricultural practices which
65 regeneratively use rather than deplete natural resources. For instance,
66 increasing and managing soil fertility and biodiversity reduces the need for
67 synthetic fertilizers and pressure from pests and diseases. Diversifying farming
68 and cropping systems increases both ecological and in-farm economic resilience.
69 Improving animal welfare and reducing intensive animal farming contribute to
70 climate change mitigation and less pollution as well as reducing risks of
71 zoonoses. Reducing the number of animals is necessary although, when sustainably
72 managed, livestock in farming systems can be an integral part of maintaining
73 biodiversity as well as providing organic fertilizers.

74 The upcoming EU Common Agricultural Policy must move from risk management that
75 focuses solely on coping to a CAP that focuses on prevention.

76 In our vision, the following measures are key if EU agricultural policy is to
77 support a transition to sustainable and resilient farming systems:

78 **End untargeted subsidies and use public money for public goods.** Phase out the
79 area-based direct payments in exchange for a significant increase in funding for
80 result-based incentives for sustainable practices which reward farmers for
81 environmental goods rather than simply covering costs. Farmers should be paid
82 for strengthening ecosystem services. Ensure subsidies are resource efficient,
83 regional specific and contribute to long-term resilience. Public money should
84 not, for instance, support the continued production of water-intensive crops in
85 water-stressed areas.

86 **Investing in the transition to *make agro-ecological and regenerative farming the***
87 **norm**, including through extensive and independent advisory services. Conduct a
88 robust assessment of the farm types most affected by phasing out direct payments
89 and set up a just transition mechanism for those farms most affected,

90 entailing financial and advisory support for the establishment of long-term
91 transformation plans.

92 **Ensure fair and decent incomes for farmers** by ensuring that farmers are not paid
93 less than production costs by adding 'selling under production costs' to the
94 blacklist in the Unfair trading practices Directive. It is crucial to combat
95 power imbalances in the food value chain by, among others, supporting primary
96 producer organisations and the infrastructure of shorter supply chains to
97 increase local production and consumption, for instance by supporting
98 alternative food networks and revising the Public procurement Directive. Promote
99 generational renewal and a variety of farm sizes by targeted support to young
100 farmers and small-scale farms.

101 **Introduce a robust set of quantitative binding EU and national targets and**
102 **impact indicators.** In particular, introduce a target to reduce agricultural
103 emissions by 2040 by at least 30% compared to 2015 and binding targets to
104 decrease the use of chemical pesticides. The impact indicators should be in line
105 with international commitments and should at least cover emissions, the use and
106 risk of pesticides, the use of synthetic fertilizers and nutrient leakage, the
107 use of antimicrobials, farmland biodiversity, soil health, water use, and water
108 quality.

109 **Genuine practice of the precautionary principle** regarding GMOs/NGTs, including
110 the effects resulting from market power/relations and consumer transparency.

111 **Ensure effective implementation and accountability** through efficient monitoring
112 which makes use of (or investigates the potential use of) information and
113 communication technologies to simplify administrative management, such as
114 satellite data. Enforce a robust accountability mechanism ensuring that Member
115 States are held accountable to targets.

116 **Ensure stronger links and better coherence between the upcoming CAP and EU**
117 **environmental and market regulation policy.** All legislation concerning
118 agriculture and food needs to work towards the same objectives and targets.
119 Subsidies provided in the CAP, for instance, must be consistent with the
120 legislation and objectives concerning nature restoration, water resilience,
121 climate change adaptation, soil health, pesticides and unfair trading practices.

122 **Effectively rebalance diets and food production to more plant-based foods by**

123 strengthening the production of local and varied protein crops for human
124 consumption. Investigate economic incentives for reduced meat consumption at an
125 EU-level.

126 **Ensuring ethical animal farming** by making animal welfare a standalone objective
127 in the CAP. Allocate sufficient financial and advisory resources to farmers who
128 transition from intensive to extensive animal farming. Ensure sufficient
129 financial support for farmers for the protection of livestock damage from large
130 carnivores to promote coexistence. Rapidly update outdated animal welfare
131 legislation.

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