



To :

Mr Joseph Daul, President of the EPP Group
Mr Hannes Swoboda, President of the S&D Group
Mr Guy Verhofstadt, President of the ALDE Group
Ms Gaby Zimmer, President of the EUL-NGL Group

Brussels, 28.02.2013

Dear colleagues,

While we are nearing the peak of our dispute with the Council on the MFF we will also be voting on the reform of the Common Agriculture Policy in March, shaping the still biggest part of the Union's budget in years to come.

The CAP has been criticized for many years for being too expensive and not sufficiently responding to the new challenges of the European project we face. The so-called "greening" of direct payments to farmers is a key argument for their legitimacy. Yet our common sense tells us something is going wrong here.

There has been much discussion about the best way of defining and applying "greening" measures in our concerned committees and three major measures have been agreed. Without entering into the details of the discussion on the best calibration and execution of these greening measures and how to define and weight "public money for public goods", there is one issue, which may appear as a minor detail at first glance, but proves to eventually have major impacts on the whole CAP reform and its agro-ecological impact: "Crop rotation" versus crop "diversification".

We don't see political disagreements on this issue but would plead that common sense is sufficient to resolve it. **We therefore would like to encourage you to follow the recommendations of the Environment Committee to introduce mandatory crop rotation as the heart of so-called "greening measures" of the CAP.**

Let us shortly explain:

"Crop diversification"

The compromise suggested by the Committee on Agriculture on greening suggests "crop diversification" which requires farmers to plant on their arable land at least 3 different crops every year. The biggest of them should not cover more than 70 and the smallest no less than 5 percent of the land. First we understood that this would be an analogue one year measure to what we all know as "crop rotation".

However, that is not the case. "Crop diversification" as proposed by the Commission and further amended by COMAGRI would have little to no effect in breaking up monocultures: up to 70% (COMAGRI even suggests 75%- 80%) of the arable land could still be planted with the same crop year after year.

"Crop rotation"

In contrast, "crop rotation" means changing the crops planted on a parcel of land every year over at least 3 consecutive years before the first crop will be planted again. Only this well established practice of rotation will yield the benefits mitigating climate change, improve soil structure and health, fertility and biodiversity.

Different crops should be planted to a field because each crop has its own pests and diseases. Year-on-year monocultures enable the massive build-up of pest and disease pressure that in turn is usually fought with more pesticides, with consequences such as loss of vital pollinators, reducing our food security. In addition, different crops are able to mobilize different nutrients in the soil and foster a diversified and healthy composition of micro-organisms in the soil. Their different root systems improve aeration, humidity storage and humus buildup in the different strata of the soil. This gives soils resilience to the increasing floods and droughts brought by climate change.



Finally, some crops (like leguminous plants) can fix nitrogen, one of the most important nutrients for plant growth; Rotation can also mobilize phosphorous, another important and increasingly scarce nutrient required by plants. On the other hand, because more organic matter (humus) builds up in the soil, nitrogen and phosphorous are retained in the soil and not lost from the fields to pollute our freshwaters
All experts and representatives of the Commission and members of COMAGRI actually agree that crop rotation has greater benefits for the protection of water, improvement of soil quality and climate change mitigation and is by far superior to what is now proposed as “crop diversification”

Control of crop rotation

Commission services have initially argued that control of rotation over 3 years was technically difficult and contravened the “annuality” of direct payments. However, except in a few Member State cases, all farmers do keep record of what they have planted to which parcel of land and thus would face no additional “bureaucracy”. Member States are already obliging farmers to rotate crops and are controlling it, so effective control solutions already exist; Member States just need to share best practice to optimize their control approach. Last but not least, crop diversification (70:25:5% per crop) could be difficult to practice on small holdings and would thus require exemptions for small farmers - with real rotation, they could also reap the benefits.

Small farmers' exemptions

Crop rotation can be practiced by all farmers and is actually practiced by most small farmers anyway. Including small holdings in this greening measure could thus extend its effect substantially.

WTO concerns

Rumors that crop rotation created problems at WTO level, jeopardizing the “green box” character of direct payments, have not been substantiated, and the Commission agrees that there is no difference between crop rotation and crop “diversification” as regards WTO impacts. Such impacts would only arise if planting of specific crops were a condition of subsidies. APRODEV, the World Council of Churches Related Development Organisations in Europe, has recently published an expertise on the two questions of WTO compliance and control which are often raised for the feasibility of crop rotation as an essential part of CAP greening measures. It concludes that crop rotation is indeed compatible with WTO rules as it is even more compatible with the Green Box criteria than crop diversification.

With this background we would like to urge you to support the amendment, adopted by the ENVI Committee with a large majority that suggests replacing “diversification” with “crop rotation” in Art.30 of the Regulation in Direct Payments.

With kind regards,

Rebecca Harms

Daniel Cohn-Bendit

Co-Presidents