THE AMBITION GAP

Assessing organic farming support measures in current draft national CAP Strategic Plans for the Common Agricultural Policy 2023-2027

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IFOAM ORGANICS EUROPE

MAKING EUROPE MORE ORGANIC

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All 27-EU Member States have until 1st January 2022 to submit their Common Agricultural Policy (CAP) Strategic Plans to the European Commission (EC), who will review and approve them during the first semester of 2022, before their implementation as of the 1rst of January 2023. Through a questionnaire and interviews, IFOAM Organics Europe collected feedback from its members from 19 different Member States between April and November 2021 to assess the adequacy of the measures to develop organic farming included in the Member States' draft Strategic Plans (SP). The focus of the analysis is on the measures and budgets foreseen for organic farming planned in the draft Strategic Plans, as well as on the quality (or lack thereof) of the involvement of national organic farmers associations and environmental NGOs in the national consultation processes. This document aims at providing an overview, based on our members' feedback, of the extent to which the new CAP will contribute to further developing organic agriculture in the EU. It also includes recommendations to improve the support for organic farming and level up the ambition of the CAP national Strategic Plans so that they contribute to reach the objectives of the new CAP, as well as the targets set in the Green Deal, the Farm to Fork Strategy and the Biodiversity Strategy.

Overall, IFOAM Organics Europe is highly concerned about the lack of proper involvement of its members - national organic farming representatives - in the national consultations on the CAP SP in several Member States, and about the insufficient ambition and budgets to incentivise more farmers to convert to organic farming, and to reward organic farmers for their provision of public goods.

This document is divided in three parts: (1) Analysis and recommendations to Member States and the European Commission to improve the draft CAP Strategic Plans and processes, (2) draft CAP national Strategic Plans benchmarking, (3) Explanation of the evaluation country per country.

Analysis and general recommendations

The national measures to support organic farming are in many countries insufficient to significantly develop organic land

The analysis of the draft SP shows a clear gap between the EU ambition to reach 25% organic land by 2030 and the too low level of support at the national level in many Strategic Plans. Indeed, whereas the overall target of organic farmland in Europe by 2030 is 25%, several countries with large agricultural land have not set ambitious enough targets to continue developing further organic farming, or foresee to reduce payments for organic farmers compared to the current situation, or plan to give equal or even higher levels of payments to farmers who engage in less ambitious standards or practices compared to organic standards.

It seems that 3 countries plan to establish a specific Eco-scheme for organic farming (Denmark, Italy and Poland). It seems that, out of 19 Member States surveyed, further 9 plan to make some Eco-schemes accessible to organic farmers (Belgium, Bulgaria[1], Croatia, Finland, France, Hungary, Portugal, the Netherlands, Spain). On the contrary it seems that 2 countries are not planning to make eco-schemes eligible for organic farmers because of alleged double funding issues (Germany and Luxembourg), which risks resulting in a lack of comparative advantage for organic farming in relation to conventional farming. IFOAM Organics Europe has not received clear enough information to assess the situation in other countries.

There are concerns with draft CAP SP in the following Member States:

Austria, the leading EU country in terms of share of organic land, only set an official 30% target for 2030 (when it is already at 26% today) and decided to merge the biodiversity and organic farming measures, which will generate a decrease of the basic premium for organic farming practices.

France only set an 18% target for 2030, which does not represent a fair contribution to the EU target. Moreover, the government withdrew support for organic maintenance under the second Pillar, which will significantly decrease the subsidies allocated for organic farmers. Through an Eco-scheme, **organic farming is currently foreseen to receive the same level of payment as other standards such as HVE** (so called "High Environmental Value") which provide lower environmental benefits than organic farming and that allow the use of pesticides, synthetic fertilizers, and GMOs. In this context of reduced payments and lack of proportionality between Eco-schemes payments and the environmental benefits provided the different "quality" standards, there will be reduced incentives for farmers to convert to organic farming.

Germany set a target of 20% at national level, but **organic farmers remain at risk of losing up to €80 per hectare compared to the current situation due to a perceived double funding issue between Eco-schemes and Rural Development measures.** Conversion and maintenance budget will remain funded through the second Pillar, but no information is available yet on the budget. Approximately €50 million per year would be needed to reach this 20% target, which would mean to double the current CAP amount.

In **Lithuania** the situation remains fluid and unclear according to the information received. The government set a target of 13% organic farmland by 2027, but how **organic maintenance and conversion will be supported** in the draft Strategic Plan, and with which budget, is unclear at the moment, making it unlikely that this target be reached.

Luxembourg has a 20% target of organic farmland for 2025 (against a current share of 5%) but it seems that the budget foreseen will not be sufficient to reach it. Moreover, it will not be possible for farmers to cumulate subsidies for biodiversity and organic farming because of an alleged **double funding issue**. **There is therefore a lack of comparative advantage for organic farming which will lead to a lower attractiveness to convert to organic.**

[1] Even though these eco-schemes in Bulgaria will offer a lower support than the one allocated to organic farming in the current CAP period.

The Netherlands is one of the only two countries where **no support for organic maintenance nor conversion to organic is planned**, and the country has not even set a target for organic farmland in the draft Strategic Plan. The only positive aspect is that organic farmers will automatically get the highest amount for Eco-schemes.

The situation is critical in **Spain** where both support for organic maintenance and conversion are not ensured, and where farmers will be able to only access one eco-scheme, and none will be dedicated to organic farming. This critical situation occurred in a context where organic farmers' representatives were not involved in the consultation process and could not provide recommendations to the Spanish Government.

The situation remains uncertain in some countries: Italy has set an objective to reach 25% organic land by 2027, but the Italian organic movement, which has not been properly involved in the consultation process, considers that this target is not ambitious enough to represent a fair contribution to the EU average target. On the positive side a specific Eco-scheme is dedicated to organic farming in the draft Italian CAP Strategic Plan, but no detailed information is available yet on the budget foreseen for this Eco-scheme nor other support measures.

In **Poland**, there are still some unclarities about organic support in the CAP Strategic Plan. **The latest draft now mentions a national target of 7%** (currently organic farmland represents 3.4% of the total agricultural land) but, strangely, it mentions that only 3.52% of the land will be able to receive organic payments. The government plans to use Eco-schemes for both organic conversion and maintenance.

On the positive side: despite remaining uncertainties on the budget, **Belgium (Wallonia)** has a clear ambition to double its organic area to reach 30% organic land by 2030.

Croatia, after an inclusive consultation process, also has the ambition to double its organic area and to reach 15%, a clear and sufficient budget, and organic farmers will have access to eco-schemes.

Denmark is planning to continue to invest in policy support to develop organics, with a clear target of 20% and a realistic budget to reach it. It is worth noting that Denmark one of the only countries that will introduce a **specific Eco-scheme for organic farming**.

In **Hungary**, despite some concerns on the consultation process, there is also a clear target to reach 10% by 2027, with stronger incentives for farmers since it is planned that subsidies for organic farmers will increase by 74% on average for the 2022-24 period.

Sweden is already a leading organic country and is planning to continue to develop to reach 30% of organic farmland by 2030 and 60% share of organic products in public procurement by the same year. Organic farming will be eligible to AECM without any double funding issue. However, there is still no clear information regarding the budget and detailed support measures.

The budget allocated for organic is, in many cases, insufficient to reach the national organic farmland target

It seems that only a minority of Member States (Croatia, Denmark, Hungary, and Luxembourg) have so far allocated enough money to support organic farming measures and to reach the organic farmland target set in their draft CAP national Strategic Plan.

According to organic farming representatives, several Member States have still not published information regarding their budget plan for the next CAP period, as it is the case for: Belgian regions Flanders and Wallonia, Bulgaria, Italy, Portugal, Sweden and the Netherlands. Due to the little time left before the date of submission of the CAP national Strategic Plans, it will be difficult both for organic farming associations to provide recommendations on the budget foreseen once the information will be released, and for Member States to take into consideration these recommendations in their final CAP Strategic Plans.

Besides, it seems that several Member States (e.g. France, Poland, Germany, Lithuania, Spain) have so far planned **a budget that will be too low to properly support organic farming or to reach their own national organic farmland target**.

Finally, two Member States planned a budget for organic farming that appears sufficient but that is expected to be cut because of national budget's debts (in the case of Czech Republic), or **for which organic farm animals support is lower than earlier** (in the case of Finland).

IFOAM Organics Europe recommends that:

- Member States should, ideally, include **payments for public goods and environmental services**, where all farmers, organic or conventional, would receive payments proportional to their contribution to the protection of natural resources. But since this is unlikely to happen, **Member States should provide an adequate level of support for maintenance and conversion to organic farming, at least at the same level as in the 2014-2020 period ("no backsliding" principle) but preferably at a higher level to boost organic production.** Support for organic conversion and maintenance could be funded via rural development measures (Article 65), via Eco-schemes (Article 28) or through a combination of both.

- **Eco-schemes should be designed to be compatible and complementary with agri-environmental and climate measures (AECMs), including organic farming measures, set in the second Pillar**. Payment rates for eco-schemes should go beyond the "lost revenue / income foregone" calculation method to reward public goods through incentives, and this possibility should be extended to second Pillar measures. For more information on how to use eco-schemes, please read our guide[2] for managing authorities.

- **Member States should set payments rates proportionate to the ambition and benefits of the farming systems and standards they support and should ensure these payments rates provide a comparative advantage to organic conversion and maintenance,** compared to less ambitious standards or single practices that deliver less environmental benefits.

- In line with the EU Action Plan on the development of organic farming (in particular Action 9), the Commission should ensure that all CAP Strategic Plans include a target for organic land that represents **a fair contribution to the EU's overall 25% target**, and that the addition of the Strategic Plans would enable to reach this overall target. Member States that still have not **introduced a national target for organic farmland** in their CAP Strategic Plan, such as the Netherlands**,** should do so.

- Member States should have different targets based on an analysis of the organic sector's production needs and capacities, and of its contribution to the CAP, European Green Deal, Farm to Fork, and Biodiversity

[2] Lampkin N, Stolze M, Meredith S, de Porras M, Haller L, Mészáros D (2020) Using Eco-schemes in the new CAP: a guide for managing authorities. IFOAM EU, FIBL and IEEP, Brussels. URL: www.organicseurope.bio/content/uploads/2020/06/ifoam-eco-schemes-web_compressed-1.pdf?dd

strategies objectives. **Member States with already a high level of organic land such as Austria should continue to develop organic farming. Large agricultural countries such as France, Spain, Italy and Germany should set ambitious targets and measures to support further organic.**

- **Budgets for support measures for organic farming for the period 2023-2027 should be realistic and high enough to allow the country to reach its national target** (based on the expected rate of conversion to reach the target) and to comparatively high enough payment rates to convince conventional farmers to engage in the whole farm re-design that conversion to organic management entails. Similarly, **conventional farmers are unlikely to transition to organic farming if less ambitious standards and practices benefit from equal or higher payment rates, or if payments stop after the 3 or 5 years of the conversion period.** For more information about how much funding should be allocated to organic farming at national level to fairly contribute to the 25% EU overall target, please read our 'Prospects & developments for organic in national CAP Strategic Plans' study[3].

- Generally, Member States should describe in their CAP Strategic Plans the relevant **policy mix** to increase both production and demand for organic products, and to ensure independent and well-funded **Farm Advisory Services,** geared towards agroecology.

[3] URL: ifoameu_advocacy_CAP_StrategicPlansAnd25Target_202106.pdf (organicseurope.bio)

The national consultation processes on the CAP Strategic Plans do not always involve organic farmers associations and are of uneven quality and inclusiveness

Most Member States involved organic farming representatives and environmental NGOs in their consultation processes through meetings, but our members consider that **their analysis and propositions were often not heard** nor taken in consideration in the draft CAP national Strategic Plans, like it has been the case in Bulgaria, France, Germany, the Netherlands, Poland, Sweden, Luxembourg, and Belgium Flanders.

Several Member States such as Finland, Lithuania, Italy and Spain **have not involved organic farming representatives** (and sometimes neither environmental NGOs) in their consultation process, which results in an even deeper lack of consideration for the needs of organic farmers in those countries.

The consultation process has been deemed transparent and open in few countries (Austria, Belgium - Wallonia, Croatia, Czech Republic, Denmark) that consulted organic farmers representatives and environmental NGOs and considered their recommendations.

IFOAM Organics Europe recommends that:

- **Member States should comply** with the EU CAP Strategic Plan Regulation's **Article 94** on procedural requirements and **consult representatives of the civil society and agricultural sector**. It is crucial to have open, fair, and transparent consultation processes where all external stakeholders are involved, heard, and have access to the information.

- **Member States should give access to civil society organisation, farming organisations' representatives, environmental NGOs, citizens, and other relevant stakeholders to their draft CAP national Strategic Plans** and to the latest information and changes of the plans.

- **The European Commission should call Member States to consult external stakeholders during the amendments process** stated **in Article 107** of the EU CAP Strategic Plans Regulation.

CAP national Strategic Plans benchmarking

IFOAM Organics Europe assessed Member States' CAP national Strategic Plans on three main points: firstly, the **content** of measures for organic farming and the environment, secondly, the **budget** allocated to implement these measures, and thirdly, the transparency, openness, and fairness of the **consultation process.** The following criteria were used to guide the ranking, which remains nonetheless partly subjective, being based on IFOAM Organics Europe's members' feedback.

Ranking criteria for the content of measures for organic farming and the environment:

- **Green** = a fair and ambitious national target for organic farmland has been set. The measures for organic farming and the environment are sufficient to envisage a continued development of organic farming over the next CAP period, beyond business-as-usual trends. Eco-schemes are environmentally ambitious and organic farmers are eligible for them.
- **Orange** = a national target for organic farmland has been set but is not ambitious or realistic. The measures for organic and the environment are included but they are not ambitious (business as usual).
- **Red** = no national target for organic farmland has been set or if this national target has been set it is too low. The measures for organic and the environment are too low to reach the national target and to foresee any meaningful development of organic farming.

Ranking criteria for the budget for organic farming and environmental measures:

- **Green** = the budget set for organic farming increased compared to the current CAP and appears high enough to reach the national target for organic farmland. Payments for Eco-schemes are adequate and organic farmers are eligible to those, in complement to AECM measures, which are not considered as "double funding" but designed to be complementary to Eco-schemes and organic farming support measures in Rural Development.
- **Orange** = the budget set for organic farming is higher than in the current CAP but is not sufficient to reach the national target for organic farmland. Payments for Eco-schemes are too low or organic farmers are not eligible to Eco-schemes because of perceived double funding issues.
- **Red** = the budget set for organic farming is planned to decrease or is too low to reach the national target for organic farmland. Payments set for Eco-schemes are too low.
- **Black** = the information regarding the budget is not available.

Ranking criteria for the consultation process:

- **Green** = the consultation process has been open and transparent. Environmental NGOs and organic farmer representatives have been included in the negotiations and meetings so far, and their recommendations were given fair consideration.
- **Orange** = environmental NGOs and organic farmer representatives have been involved in the negotiations and meetings, but their recommendations have not been taken into account, and they had no access to information at certain points.
- **Red** = the process is not open nor transparent, NGOs and organic farmer representatives have not been involved in the process/meetings.

		Content	Budget	Process
Austria		⊖	⊖	✓
Belgium	Flanders	⊖	?	⊖
Belgium	Wallonia	✓	?	✓
Bulgaria		✗	?	⊖
Croatia		✓	✓	✓
Czech Republic		✓	⊖	✓
Denmark		✓	✓	✓
Finland		⊖	⊖	✗
France		✗	✗	⊖
Germany		⊖	✗	⊖
Hungary		✓	✓	⊖
Ireland		✗	⊖	✓
Italy		✓	?	✗
Lithuania		✗	✗	✗
Luxembourg		✗	✓	⊖
Netherlands		✗	?	⊖
Poland		⊖	✗	✓
Portugal		⊖	?	✗
Spain		✗	✗	✗
Sweden		✓	?	⊖

Legend: For a full explanation about the colours, see the previous page. No sufficient information was received to evaluate the situation in Cyprus, Estonia, Greece, Latvia, Malta, Romania, Slovakia, and Slovenia.

Explanation of the evaluation per country

Austria

The content is ranked orange: **An official target of 30% of organic farmland by 2030 was set up in the draft CAP SP**. Given that the share in 2020 was 26,5% this cannot be considered as an ambitious objective. The Austrian Ministry seems to consider that Austria has already reached the Green Deal objective on organic farming, even though the Farm to Fork's 25% target is an EU average, so Austria is expected to do more. IFOAM Organics Europe's Austrian members advocate for a more ambitious target of 35% by 2027.

Austria decided to integrate the **biodiversity measure "UBB" into the organic farming measure**, which means that organic farmers have to meet a number of obligations (e. g. biodiversity measures on 7% of the farmland) additional to what is laid down in the organic regulation. At the same time the premium for the future organic measures (incl. UBB) is planned to be lower than it used to be in the previous period (organic farming only), while the premium for the sole biodiversity measure "UBB" (for conventional farmers) is €70/ha. Thus, organic farmers will have to deliver more for less money, so **organic will get deprioritized** and less attractive. On the other hand, organic farmers could take part to almost every agri-environmental measures (AECMs) without having any double funding issue. Organic farmers are also eligible to other non-organic measures such as investments, but generally there is no privilege for them. Furthermore, support for organic are foreseen in sectoral interventions such as fruits and vegetables, and bee keeping.

The budget is ranked orange: **The budget foreseen is based on the not very ambitious objective of 30% by 2030 and the reduced premium (see above).** The Austrian Ministry of Agriculture does highlight organic farmers would have access to various top-ups (within the organic measures) and combinable, horizontal measures. But these payments are not for organic farming practices as such, but for services provided on top of organic. **Since top-ups and horizontal measures are eligible for both conventional and organic farmers, they do not increase the comparative advantage for organic farming.** Eco-schemes are not treated as a special type of measure, but as agri-environmental measure financed by first Pillar money.

The consultation process is ranked green: The process has been led by the Ministry of Agriculture. The consultation process consists of working groups, public events, and consultations. **The organic movement has been involved** in working groups on agri-environmental measures. Late, but nevertheless premiums and budgets for the interventions have been published.

Belgium – Flanders

The content is ranked orange: **There is no specific target for organic land.** Organic farming is under the current legislation considered as "green by definition", but that resulted in difficult double funding issues (e.g., for leguminous crops and EFAs, as primes for leguminous are very often used by organic farmers). In the new legislation (from 2023 on) possible combinations between organic farming and Eco-schemes will be easier given there will not be any double funding issue *(see the budget section).*

The budget is not available is therefore ranked black: Even if there are no figures available yet, the organic premium system will probably change. It will consist of:

- **Premium for conversion to organic** (as before) calculated with the costs / income foregone method and allocated for 2-3 years under the agri-environmental and climate measures (AECMs) in the second Pillar.
- **Organic maintenance premium (a contract per year)** which is a top up premium allocated under Eco-schemes in the first Pillar. IFOAM Organics Europe's Belgian member estimates this premium to be around €150-200 per hectare and it will be the same amount whatever you produce. On the one hand, this is a disadvantage for the farmers producing vegetables because they currently receive €400 per hectare. On the other hand, with this new premium there will not be double funding issues anymore.

The consultation process is ranked as orange: The process is led by the regional Ministry of Agriculture, with some involvement of the regional Ministry for the Environment. **IFOAM Organics Europe's Flemish member is seen as a farming organisation** and is therefore **involved** in the consultation process mainly through online meetings, whereas **environmental NGOs are excluded**. This member is well informed, but its recommendations are not properly considered. In the regional Parliament, some questions arise from the Members of the Agricultural Commission and some hearings are organised.

Belgium – Wallonia

The content is ranked green: The Walloon Organic Action Plan (OAP) sets a target of **30% of organic land by 2030 (currently 12-14%), which is very ambitious but realistic.** Wallonia's CAP Strategic Plan should include the measures set in this OAP.

The budget is not available and is ranked black: The budget is not mentioned in the Walloon Government's legislative proposal for the CAP SP, which only states "a consolidated support for organic farming". It is therefore not clear whether the budget will enable to reach the measures set for organic farming yet. IFOAM Organics Europe's Belgian members call the government to allocate a proper budget in the CAP SP, like they did for the Walloon OAP. The Belgian Administration proposed to the Government an increase of 10 to 20% of the organic maintenance and conversion budget, but there is still no information whether the government will agree with this proposal. With a 20% increase, the organic budget would reach a total of €170 million for the new CAP period.

The consultation process is ranked green: It was in two periods and organised by the Walloon Administration (civil servants) through online collective and bilateral meetings. During the identification of the needs (first period), IFOAM Organics Europe's Wallon member was not involved whereas environmental NGOs and other farmers organisations were. During the negotiation period (second period), conventional and organic farming representatives and environmental NGOs were included. Then the Walloon Government will decide for the final draft of the CAP SP. The Walloon Parliament also organised a two-day consultation of different stakeholders (environmental organisations, academics, farmers organisations) in February 2021.

Bulgaria

The content is ranked red: The Bulgarian Ministry of Agriculture, Food and Forestry has not started the process of updating the existing Organic Action Plan yet. In the current organic Action Plan, quantitative targets and budgets are missing. **The organic sector proposes to set a 15% target for organic land by 2030, but the administration is less ambitious (10%).** IFOAM Organics Europe's Bulgarian members proposed to move organic farming maintenance payments (with differentiated rates by crop and livestock species) as an Eco-scheme under Pillar 1, so that there is more money in Pillar 2 for new organic farms in transition. The Ministry of Agriculture accepted only part of our members' proposal – there will be a payment of a small amount per hectare, the same for all crops and per livestock unit. The purpose of this payment is to be additional to the basic area payment. The compensatory payments for conversion to organic farming and the maintenance payment with different rates for crop groups, grazing animals and bees remain in the Pillar 2 intervention and will be similar to the payments under measure 11. The Pillar 2 interventions are not ready yet and have not been discussed in working groups.

The budget is not available so is ranked black: The Ministry of Agriculture does not want to present any budget for the moment, our member only discussed the content of the measures. Most probably the total budget for organic farming payments in the intervention in Pillar 2 will be smaller, compared with the budget in the current Measure 11. This will not enable to increase the organic farming areas (now 3.2%).

The consultation process is ranked orange: The process is led by the Ministry of Agriculture; a parallel process is organised by the National Rural Network. Bulgarian sector representative organisations are active in the two processes. The decisions are taken by the Ministry. Explanations and good ambitions and messages from the administration are difficult to be assessed, because the budgets are missing.

Croatia

The content is ranked green: **The Croatian government set up a 15% target of organic farmland by 2030 (for a current share of 7.8%) in the CAP SP, which is realistic** according to IFOAM Organics Europe's Croatian members, despite the fact that the majority of this organic farmland are pastures, so the organic vegetable production has not grown that much. Ten measures to protect the environment such as butterflies' protection and grasslands are planned under the second Pillar.

The budget is ranked green: In the draft CAP SP, €3.4 billion are planned for the whole CAP period (2023-2027). **Under the first Pillar, organic farming will receive 1.75 million every year, and will be eligible for Eco-schemes which represent 93.4 million per year** (25% of the whole Croatian CAP SP), so there is no problem of double funding and **organic farming has a comparative advantage** compared to conventional farming. Croatia will also give an additional 15% budget to the EU contribution in the second Pillar.

The consultation process is ranked green: It was in two phases. The first one was led by public agencies and the second one was open to everyone. The process is led by the Ministry of Agriculture, and the Parliament is not involved. The Ministry created an electronic system *E Savjetovanja* where all the **documentation related to** the agricultural strategies and **the CAP is published**. Generally, the **open call** to submit recommendations and comments were open for two weeks. The information regarding the budget and the agri-environmental measures (AECMs) was available only recently. **The Ministry agreed to** meet with the whole farming sector, including **organic farming representatives,** only recently, after the Law on Seeds passed.

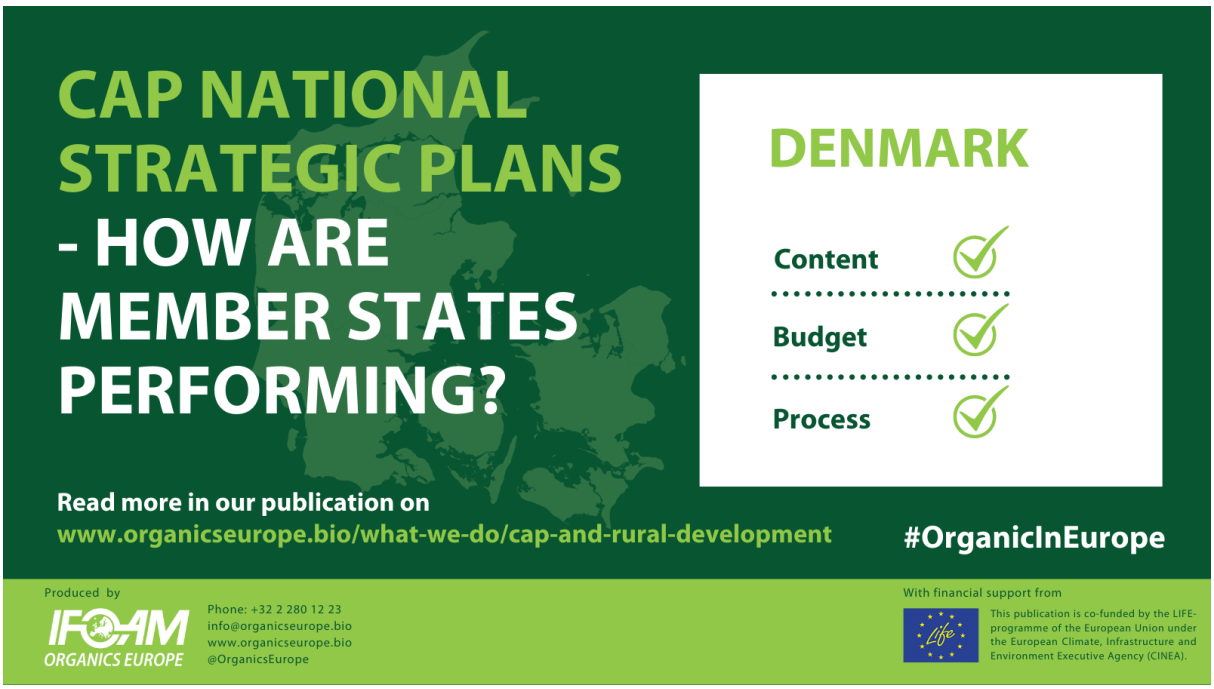
Czech Republic

The content is ranked green: The national target for organic land is **23% in 2027** in the CAP SP (for a current share of 15%) and **25% in 2030** in the national organic action plan, which is **ambitious and realistic** according to IFOAM Organics Europe's Czech member. Thanks to this target, there should be a bigger share of organic arable crops. Public procurement, advisory services, investments will be relevant additional measures to support organic farming. Nonetheless, organic farmers cannot receive money for most animal welfare measures expect one regarding young bovine.

The budget is ranked orange: **Maintenance and conversion** support are both covered in the second Pillar, which is stronger than the first Pillar. **A comparison of organic farms and conventional farms** (through vegetable, arable land, permanent pasture) will be the basis for the calculation of payment rates. The Ministry of Agriculture will decide which percentage of this difference it will pay. This will be done also according to the available **EU rural development budget which decreased significantly for the Czech Republic (-16%** compared to 2014-2020). The Government said it will co-finance the second Pillar with 65% but it seems unrealistic **because national financial issues linked to the COVID-19 situation will trigger cuttings in the CAP SP budget.**

***The consultation process is ranked green*:** It is well organised through online meetings (approximatively twice a week) where each aspect of the CAP SP is discussed. It is led by the Ministry of Agriculture, whereas the Ministry for the Environment is only a participant**. Organic farming representatives and environmental NGOs are well involved in the process.** In July 2021, the Government presented the draft CAP SP and no meetings have happened since then **so external stakeholders have not seen the draft for two months. Then** in October 2021, the new CAP Strategic Plan was released, and a meeting is planned in November.

Denmark



The content is ranked green: There is a national target to double the area and market from 2020 to 2030, to reach approximately **20% of organic farmland.** IFOAM Organics Europe's Danish member assesses this target as realistic even though a 30% target would have been more ambitious. In a recent political agreement published on 4 October 2021, **a specific Eco-scheme for organic farming was introduced**, which is seen as a positive signal by the Danish Government who believes the European Commission would have been critical if no eco-scheme was dedicated to organic farming. IFOAM Organics Europe's Danish member would have preferred a general Eco-scheme payment based on a climate and field eco-space accounting system**,** but the Ministry was not ready to this more fundamental change yet**.** Eco

The budget is ranked green: The Danish government planned **3.556 million DKK for organic farming** for the whole CAP period (2023-2027) which will be **sufficient to reach the 20% target** of organic farmland. This budget consists of **organic maintenance** (under the first Pillar), maybe additional support for **organic conversion (not decided yet)** as well as measures applying **a lower Nitrogen ceiling**, and finally **special payment** for land with fruit and berries. IFOAM Organics Europe's Danish member will request an analysis to assess on the one hand the comparative advantage of organic farming by comparison to conventional farming, and on the other hand the evolution of the current economic situation of organic farmers and the one reached with this new CAP SP.

The consultation process is ranked green: **Organic farming representatives were involved** in bilateral and collective meetings, as well as in workshops gathering around 20-30 people (one or two representatives for each organisation. **Their ideas were considered** by the Danish authorities and Ministry even though IFOAM Organics Europe's Danish member feels like there is little space for manoeuvre and there is a time constraint as the involvement started late. Indeed, the Government has waited for the general political plan on green transition of Danish farming to be agreed on. The SP was not launched for consultation until 1 September 2021. The Government will launch another consultation on a revised draft mid-November. Traditionally there has been a very little awareness among the Danish Parliament on EU agricultural policies. Our member believes this is a mistake and the new political agreement on the Green transition will change this situation.

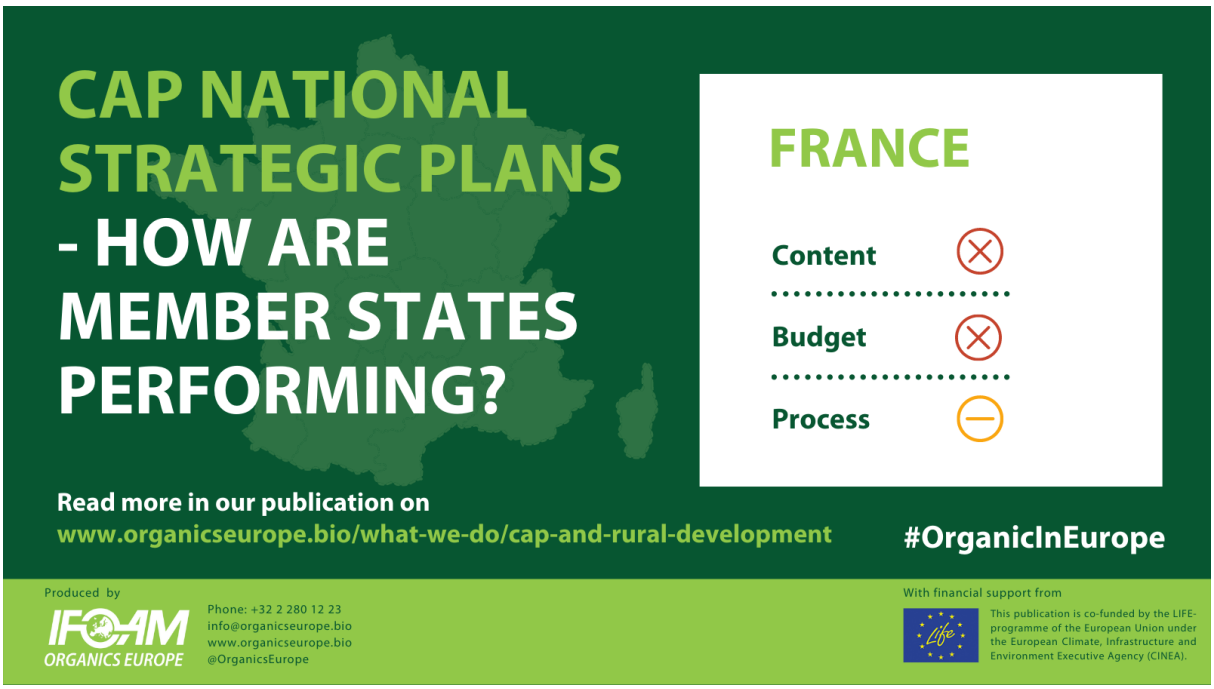
Finland

The content is ranked in orange: The draft Finnish CAP SP is very similar to the current one in terms of measures and structure and only minor changes occurred. **The national target for organic farmland is 20% by 2027** (against a current share of 14.5%). **Environmental measures planned in the draft CAP SP are not environmentally ambitious** according to IFOAM Organics Europe's Finnish members. Organic farming can take part in most of agri-environmental and climate measures (and Eco-schemes. Land lying fallow with species composition for biodiversity purpose and green manure meadows are not supported in organic farming. **Organic maintenance support is paid under the second Pillar. There is no premium for conversion to organic. The dairy and livestock support** will be converted from a current payment per hectare/stocking density to a future payment per animal units, **which will reduce the support allocated.**

The budget is ranked orange: **The budget for Eco-schemes is low (only 10-15 % of first Pillar payments) and the second Pillar funding for the environmental aid scheme is declining.** The organic budget is €47 million higher than what was paid in the previous period. **Budgets for support measures for organic farming is around €380 million and it is almost high enough to allow the country to reach its national target**. It is difficult to estimate if payment rates are comparatively high enough to convince conventional farmers. Organic support will remain at the current level of €160 per hectare. Organic farm animals support is lower than earlier, €130 per ha. One livestock unit entitles the support to two hectares if the holding has enough eligible hectares.

The consultation process is ranked red: It was led by the Ministry of Agriculture. The Ministry of the Environment, a research institute, environmental NGOs, an animal welfare organization, and organizations of conventional farmers have representatives in the working groups. **Organic farmer representatives are not involved in the process/meetings. There was no actual public debate during the preparation process,** but after the publication of the CAP SP proposal, **a public consultation took place, which collected 370 comments and 153 comments on organic support**. **Further preparations will be made behind closed doors.** Organic organizations have had a few online meetings with the Ministry, but those have been more like hearings, not real two-way discussions. The same procedure took place in the CAP SP workshops organized by the Ministry. None of the organic proposals to promote organic production were included in the CAP SP. **After the public consultation, the Ministry announced changes to organic support system**. The organic budget has been significantly increased and a new requirement for organic farms, that all animal production must be under organic control, has been abandoned. These changes have been considered in the above assessment.

France



The content is ranked red: Recently, the French Minister of Agriculture acknowledged that the target set up in 2017 aiming at 15% organic farmland by 2022 will not be reached. However, a new target was set up in the French SP aiming **at doubling the organic farmland to reach 18% by 2027 (by extension 20% by 2030).** IFOAM Organics Europe's French members advocate for 25% organic farmland for 2030 **to contribute fairly to the overall EU target.** In the draft French CAP SP, **there is no incentive to convert to organic.** Moreover, a recent report published by the Environmental Authority highlights the lack of ambition of the French CAP SP.

The budget is ranked as red: There will **no longer be any support for organic maintenance.** The Government chose to **only maintain the support for organic conversion, with a maximum threshold**, which is not fixed yet, but it will be probably between €15,000 and €20,000 per farm and an annual contract (not 5-year contract as it was organised in the 2014-2020 plan). Organic farming can be combined with specific agri-environmental and climates measures (AECMs) such as the protection of birds. Regarding Eco-schemes, **organic farming will receive the same level of payment than other farming practices such as HVE** (so called "High Environmental Value") which have lower environmental benefits than organic farming given that they authorise the use of pesticides, chemical fertilizers, and GMOs. **IFOAM Organics Europe's French members call the French government to allocate a payment based on the environmental benefits delivered to support properly organic farming.**

The consultation process is ranked orange: It was organised via online meetings and written consultations. **Organic farming representatives met with the Ministry's cabinet and services through bilateral meetings, but their concerns and proposals were not heard.** The Ministry for the Environment is involved but seems not have influence in the process as the Minister does not speak publicly about the CAP SP. There is no binding consultation of the Parliament on the CAP, and there will be no possibility of vote. **French conventional farming associations seems to have a lot of influence in the process.**

Germany

The content is ranked orange: **The German draft CAP SP set a national target of 20% organic land by 2030**, which is fair and relevant for the whole country according to IFOAM Organics Europe's German members. In Germany, targets are different depending on the "Länder" and **some regional targets are even higher like in Bavaria. According to organic farming associations, market-related targets should be set to reach this goal** (e.g., 30% organic food in public canteens of hospitals, senior homes, prisons, government agencies etc.). Many German states have regional strategies and action plans to boost organic farming on their territories. Besides, the acting German government (which stays in power until the newly elected government is formed) leaves no doubt that they would rather focus on conventional farmers reducing their use of pesticides than on boosting organic farming. Officials often emphasize that improving 90% of the agriculture would have a more substantial impact on the environment.

The budget is red: According to IFOAM Organics Europe's German members, **organic farmers remain at risk of losing up to €80 per hectare compared to the current situation due to a perceived double funding issue between Eco-schemes and Rural Development measures.** Indeed it is not guaranteed that organic farmers will have access to Eco-schemes (e.g., on no use of pesticides). **Conversion and maintenance budget will remain funded through the second Pillar. Approximately €50 million per year are needed to reach the 20% target,** which would mean to double the current CAP amount, and which presumes a linear rise of the amount of new organic land.

The consultation process is ranked orange: The government organises online meetings and the Parliament organises short debates. **Organic farming representatives and environmental NGOs are integrated** in the consultation process, but they have little influence. Regional governments with ambitious targets for organic agriculturecollaborate more closely with organic farming representatives.

Hungary

The content is ranked green: **Hungary set a target of 10% of organic farmland by 2027 (currently 6%) in the national Organic Action Plan.** An informal target of 15% to be reached by 2030 was discussed. These targets are realistic according to IFOAM Organics Europe's Hungarian members. **The organic movement hopes the Hungarian Organic Action Plan will be adopted by the Ministry of Agriculture in December to be included as an annex in the CAP SP.**

The budget is ranked green: For 2022-2024, the organic schemes continue based on the old CAP. **In October 2021, an open call was launched to receive maintenance and conversion budget for 2022-2024,** and the condition is only to fulfil the EU Organic Regulation. **The subsidies for organic increased in average by 74% for the 2022-2024 period**. The next call will be in 2025 for the 2025-2030 period.

The consultation process is ranked as orange: **The external stakeholders such as organic farming representatives, research centres and environmental NGOs were involved in the process.** They drafted the Hungarian Organic Action Plan (eight areas with target values such as proportion of organic food production and ratio of organic food in public procurement). The stakeholders' phase is now finished. The political one has started and involves the Ministry of Agriculture as well as the Ministry of Innovation and Technology. The Government wants to submit the CAP SP in December.

Ireland

The content is ranked red: The current draft of Ireland's CAP SP includes proposals for some small improvements to the organic farming scheme, eligibility for some Eco-schemes and priority access to agri-environmental and climate measures (AECMs). However, organic payments rates as proposed do not sufficiently reflect the costs of organic production in Ireland as well as the potential opportunity costs associated with organic conversion. **Organic payment rates as proposed are inadequate to fairly reward existing organic farmers or incentivise new convertors**. In addition, the extent to which organic farms will be able to combine environmental payments (AECMs and Eco-schemes) with organic farming payments has yet to be clarified. Currently, there are 15 actions under the Irish AECM programme 2014-2020 (GLAS) as well as a pilot results-based scheme (REAP) where organic farmers must forgo organic farming payments because of perceived double funding issues (despite often not being requirements of the organic regulation). Furthermore, only 2-3 of the 5 options proposed under the Eco-scheme would be relevant to organic farmers and more ambition is required. Potential exclusions from these schemes/actions could send the wrong signal of the EU's recognition of organic farmers wider contribution to environmental and climate goals.

The budget is ranked orange: The government has publicly announced **a proposed budget allocation of €256 million for the organic farming scheme to reach 7.5% of organic farmland by 2027.** However, specifics on how organic farmers will be supported across the full range of supply-push (e.g., AECMs, Eco-schemes, advisory services, and knowledge transfer) and demand-pull measures (e.g., LEADER) to support the long-term development of the organic sector still requires greater clarity (see the content part for further details).

The process is ranked green: There is one organic sector representative, the Irish Organic Association, on the government' CAP consultative Committee. As a result, **the Irish Organic Association has been able to take part in all formal meetings of the committee as well as having the opportunity to make some written submissions as part of the design process.** However, despite these contributions often being well-received, the devil is in the detail.

Italy

The content is ranked green: **Italy set up a 25% target of organic farmland by 2027 in its draft CAP SP.**
A draft of the Italian CAP SP regarding the list of Eco-schemes has been elaborated:

- The **Eco-scheme number one** will be dedicated to animal welfare but at the moment**, no information has been shared on whether it will include or not the organic farming livestock** which already meets higher animal welfare requirements set in the Regulation 2018/848, than other farming livestock methods.
- **The Eco-scheme number two will be dedicated to organic farming** with a target of 2.8 million and 3.2 million hectares of organic farmland which means between 22% and 25% by 2027. This target is not ambitious enough according to IFOAM Organics Europe's Italian members, given Italy has currently approximatively 16% of farmland run in organic. A survey conducted by IFOAM Organics Europe's Italian members proposed a 50 % target of organic farmland in Italy by 2030 to be in line with the F2F's EU overall target.

The discussions and draft are still on-going regarding the Rural Development Measures as well as the AECMs ones. IFOAM Organics Europe's Italian members do not have any information on the measures foreseen to properly support the development of organic farming (budget, investments, trainings, technical assistance, information, and communication).

The budget is not available and is ranked black: The budget is not set up yet. The communication from the Ministry of Agriculture on how to reach (budget) the target to support the development of organic and reach the national organic farmland target is still not clear. **The current draft does not have any information regarding the budget allocated to Eco-scheme for organic farming, organic maintenance, and conversion, nor AECMs.** Regarding the support for organic maintenance and conversion, discussions are still on-going whether conversion should be maintained in the second Pillar and maintenance should be included in the first Pillar, or whether a top-up premium for organic will be created and included in the second Pillar as it is currently the case.

The process is ranked red: The process is very late in Italy and the Government have not presented the whole draft to stakeholders yet, whereas the Italian CAP SP has to be submitted by the end of the year. **IFOAM Organics Europe's Italian members are involved in the wide table of stakeholders** (a hundred of organizations) and of the RRN (National Rural Network) **but are not sitting at the table with Ministry where the decisions are taken. Our members sent recommendations regarding the draft but never received an answer.** Our members also requested the creation of sectoral working groups, but they still have no met anyone yet. Besides, the Minister of Agriculture is in unstructured dialogues with environmental NGOs and

general farming associations (which also have sections dedicated to organic) but never met farming associations only dedicated to organic, but never met organic farming associations.

Lithuania

The content is ranked red: **A target for organic land was set to 13% by 2027** and 15% by 2030 (against a current state of 8,4%). This is ambitious and supported by environmental NGOs, but **strong measures will be needed to reach it**. Eco-schemes foreseen in the draft CAP SP do not have high environmental commitments. Support of organic conversation is planned under Pillar 1 and the support for organic maintenance is planned under Pillar 2. The development of the sector has a lot of uncertainty: the change of political leaders, a lot of declarative support for organic farming but **the country refused to prepare an action plan for organic farming.**

The budget is ranked red: The draft of the CAP SP released in May planned €80 Ml per year for organic conversion and maintenance, which would be enough to reach the 13% target, but this figure is not ensured, and the current solutions do not guarantee the success of organic farming. For instance, how the financial envelope will be distributed will depend on AECMs as well as the support levels for Eco-schemes and Pillar 2.

The consultation process is ranked red: The process is led by delegated representatives of the Ministry of Agriculture and the Ministry of Environment. **The representatives of farmers' organizations, both conventional and organic, have not been involved at all in the working groups to prepare and draft the CAP national SP.** Farmers' organisations are invited to meetings only once the draft SP is done and are not able to propose suggestions. **The Ministry of Agriculture organized 3 meetings with social partners (NGOs)** on Eco-schemes and rural development AECMs.

Luxembourg

The content is ranked red: In 2018, the government decided to plan only until 2025 given there will be new elections in 2023 and so the new Parliament and Government will decide for the years after 2025. The government set **a 20% target of organic farmland for 2025** (against a current share of 5%). The measures set in the second Pillar will not change a lot. **The subsidies for biodiversity and organic farming cannot be cumulated because of the alleged double funding issue**, so farmers will be paid for the highest one (in most cases it will be the one for biodiversity). **There is a lack of comparative advantage for organic farming which leads to a lower attractiveness to convert to organic.** The schemes aiming at reducing pesticides and fertilizers use could be cumulated to organic farming. Regarding Eco-schemes, they will represent 25% the first year (transition period) and 30% after. There is no clear definition of Eco-schemes yet, but one should support legumes. Organic farming will be eligible to all the Eco-schemes because their current organic farming practises are already aligned with the Eco-schemes requirements. Besides, the subsidies allocated for animals will be limited and new installations will need to comply with the EU Organic Regulation.

The budget is ranked as green: **In Luxembourg, there is a budget both for organic maintenance and conversion, and the control and certification costs are reimbursed to small farms and beekeepers.** There is an amount of €11.4 million for organic during the CAP period until 2025 (subsidies included). In case this amount is not enough to support the 20% target, Luxembourg will have enough additional national funds to support organic and reach the target. Our member hopes that the new Parliament and Government elected in 2023 will continue to allocate enough budget to support properly organic.

The consultation process is ranked orange: **Organic and conventional farming organisations were invited to meetings with the government, whereas environmental NGOs were not involved.** Only three meetings were organised to discuss the SP as a whole and measurements opportunities (animals, installation, etc.). Recently, the government published a public consultation open to everyone and for a month (until 18 November). IFOAM Organics Europe's Luxembourgish members believe this consultation is complex and was published too late. Our member is involved in a platform *Meng Landwirtschaft* gathering 22 organisations to do common actions and send feedback to the consultation.

The Netherlands

The content is ranked red: **There is no support for conversion nor maintenance, but organic will automatically get the highest amount for Eco-schemes. There is no national target for organic farmland** as the government believes the development of organic should be only market-driven. The government has announced that they will formulate a strategy to promote consumption and production of organic agriculture but has not taken any public steps in this regard yet. In the previous draft Dutch CAP national SP, organic farmers were considered as 'green by definition' and therefore not subject to the conditionality requirements in question (since current greening requirements will be integrated in the conditionality in the next CAP). This changed in the current draft CAP national SP and will mean that a lot of organic farmers will have to seriously alter their current business operations to comply with the conditionality and are financially set back in doing so. Mid-November, the Dutch parliament voted a resolution that requests the Dutch Government to transfer up to 30% of funds from Pillar 1 to Pillar 2 during this CAP period (2023-2027). Given Eco-schemes are part of the first Pillar, IFOAM Organics Europe's Dutch members consider it as a risk because this could mean farmers get less direct payments. Moreover, due to the many interests trying to be served by the CAP-budget, our members are concerned that organic farmers will just get a small share of this Pillar-2 budget.

The budget is not available and is ranked black: The plan is to divide eco-measures in three different classes: bronze, silver, and gold with approximal €40 difference per hectare. Organic will automatically be gold. There is no budget or amount determined per hectare for this system, nor for other measures.

The consultation process is ranked orange: It consists of meetings **including** different groups such as conventional and **organic farmer representatives, and environmental NGOs.** IFOAM Organics Europe's members ask for meetings with civil servants of the Ministry of Agriculture to discuss the plans and hopes the process will be more transparent.

Poland

The content is ranked orange: **There are still some unclarities about organic support in the CAP Strategic Plan. The latest draft now mentions a national target of 7%** (in 2020 organic farmland represented 3.3% of the total agricultural land) but, strangely, it mentions that only 3.52% of the land will be able to receive organic payments. The government plans to use Eco-schemes for both organic conversion and maintenance. According to IFOAM Organics Europe's Polish members, the development of organic farming should also be supported through the use of public procurements and relevant advisory services.

The budget is ranked red: it seems that the budget to be allocated for organic farming (€746,03 million for the whole CAP period) would enable to support only 3.52% of agriculture farmland under organic management, which would not **represent a significant increase** as the country currently has 3.4% of organic farmland (but currently only 2,6% is supported by area payments for organic farming). **It is unclear how additional organic farmers (to reach 7%) would be supported.** The government claims that organic farming could benefit from other measures such as modernisation, but this is not a realistic prospect. According to IFOAM Organics Europe members.

The consultation process is ranked green: **It involved external stakeholders such as organic farming representatives and environmental NGOs. The draft versions of the CAP SP were available** on a governmental website, and it was possible to send comments (even though it was a bit complicated). IFOAM Organics Europe's Polish member sent letters and were invited to two online meetings. The latest draft was published on 9 November 2021.

Portugal

The content is ranked orange: IFOAM Organics Europe's Portuguese members have not received any information on the target of the organic farmland yet from the Portuguese Government. Nevertheless, it has been said that **organic farming conversion and maintenance will be considered as independent measures and will be included in Eco-schemes.** Organic farmers would be able to cumulate these measures with others in the Eco-schemes, as well as with environmental measures foreseen in some situations.

The budget is ranked black: IFOAM Organics Europe's Portuguese members have not received any information from the Ministry regarding the budget, which is thus considered not defined.

The consultation process is ranked red: The process is led by the Portuguese Ministry of Agriculture and is running with confederations and farming experts meetings. IFOAM Organics Europe's member has been indirectly involved through its participation to the Directorate of the Confederation of Farmers (CNJ), that has had access to the negotiations and hearings with the Minister of Agriculture. There has been only one meeting with environmental organizations, highlighting that environmental organizations are not regular partners in the process. On 19 November 2021, a consultation process to citizens will be launched and last two weeks. This consultation will present the new Portuguese Government's CAP SP proposal (PEPAC proposal).

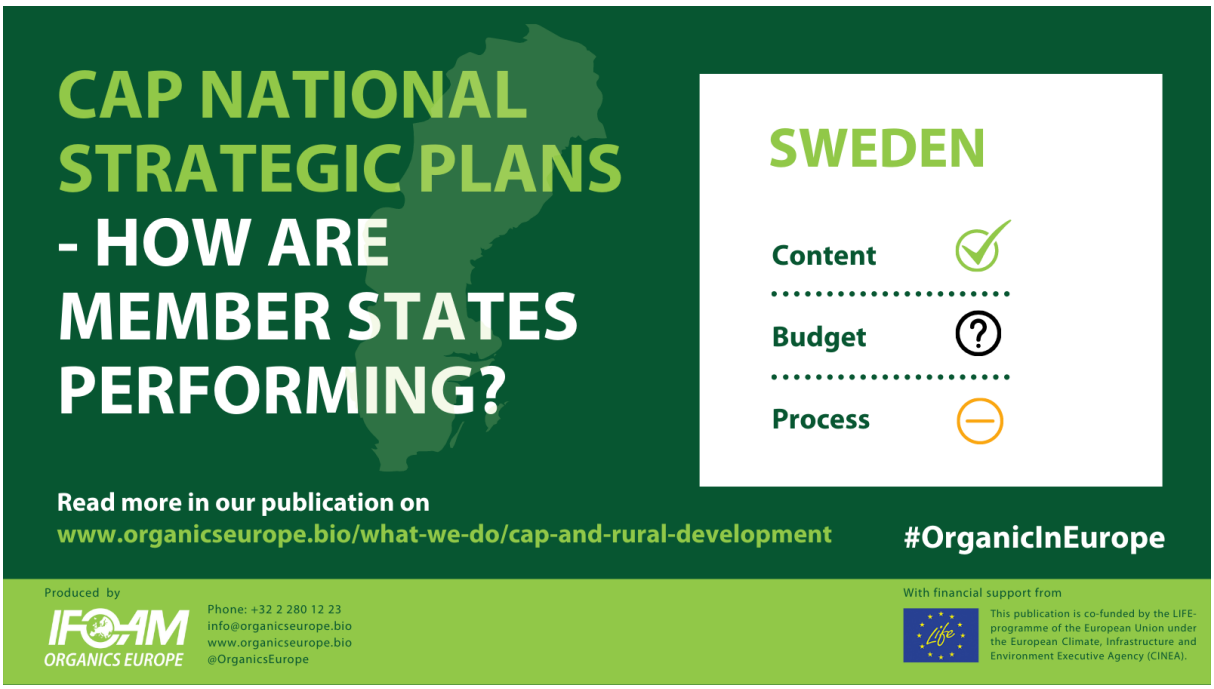
Spain

The content is ranked red: **There is not any official document with the level of ambition of measures and it will depend on the Regions´ decisions as Organic Farming will be funded by Pillar 2.** For instance, IFOAM Organics Europe members expect the ambition to be high in Comunidad Valenciana and Andalusia thanks to a good structuration of the organic sector, a good participatory process between producers and consumers, and a fair budget for organic farming per hectare. In La Rioja and Catalunya, the measures for organic could be similar to the current ones. In other regions a good support is not foreseen. **All farmers will be able to request subsidies only for one Eco-scheme, and there will not be any Eco-scheme for organic farming**. **The eight chapters developed by the Ministry of Agriculture about the second Pillar 2 is similar to the current second Pillar.**

The budget is ranked red: The annual budget for Eco-schemes is €1,107 million per year. The total budget for the second Pillar will be €7,776 million for the whole CAP period (2023-2027), plus an additional recovery budget of €750 million. The Ministry of Agriculture is still waiting for the proposals from the regional governments to complete the national draft CAP SP. **The integration of the support for conversion and maintenance in the second Pillar 2 is not ensured.**

The consultation process is ranked red: It is not transparent given it only includes conventional farmer organisations, which have a lot of influence. Five large environmental NGOs have been informed but their inputs have not been included. **Organic farmer representatives are not involved in the process and do not have access to information on the draft CAP SP** (except for elements shared by some NGOs). Public consultations only open for two or three days, which it too short to provide consistent feedback. A new public consultation will be launched in November, but deadlines will be too tight to include the outcomes of it in the final Spanish CAP SP.

Sweden



The content is ranked green: **30% of organic farmland** (including pastures, lay, etc) **by 2030 and 60% share of public procurement** by the same year. These targets are stated in the action plan for the national food strategy, that the SP is said to relate to. When it comes to broader sustainability outcomes of the Swedish SP it is more unclear if the plan is really going to enable a substantial shift to more sustainable practices. There is a strong current political will to only focus the SP on strengthening the competitiveness on farm level, arguing that by ensuring more viable farms will provide environmental benefits to continue farming the landscape. Organic farming will be eligible to AECM without any double funding issue.

The budget is ranked black: Political discussions at national level and the final budget details from the EU are still ongoing so there is no clear information regarding the budget yet.

The consultation process is ranked orange: The process is led by the agricultural body of the Government, but the environmental body is well involved as well. The process consists of online meetings and extra consultation meetings which occurred only after several organisations requested to be more involved. On top of the Swedish farmer organisation (representing also organic farmers), the Swedish association of organic farmers is also invited to the process. This organisation is quite visible and at least has some influence on the support to organic farming but has a low influence on a broader level compared to other organisations. Lately, when detailed support measures and the budget have been more closely discussed, the organic farmers were not involved anymore.