

THE ALLIANCE FOR AGRICULTURE AND COOPERATION



To: Mr. Janusz Wojciechowski
Commissioner for Agriculture and Rural Development

Subject: Derogations from CAP requirements for 2024

Bucharest, 23rd of November 2023

Dear Commissioner,

We are writing to you to express our deepest concern regarding the possibility of the abandonment of agricultural activities by the European farmers due to a combination of the current geopolitical context and the consequences of the extreme weather conditions in EU. In fact, if derogations to the CAP conditionality, eco-schemes and agri-environment-climate commitments in 2024 are not be adopted as soon as possible, this will be the most likely outcome.

Therefore, **we are kindly asking you to grant derogations to the CAP conditionality rules, eco-schemes and agri-environment-climate commitments for the application year 2024.**

The Green Deal is a new vision of the EU regarding the responsible use of the natural resources, including the soil and the conservation of biodiversity. Everybody agrees that combating pollution and achieving rational use of soil and water, is a relevant objective. But, at the time the conditionalities of the new Common Agricultural Policy (CAP) were drafted, no one imagined that starting from 2020 for the following 3 years, EU will pass a sanitary crisis due to the COVID-19, followed by two wars at the European borders and severe weather conditions with negative impact on the adoption and implementation of these CAP requirements.

As a rule, the land is worked when *the physically maturity of the soil* is achieved - and agronomists know this and respect it. The *soil moisture* is the factor that determines when the land must be worked and not a regulation set in an office. Farmers depend on the course of nature and under no circumstances a regulation should fix these periods when the farmers are obliged to work or not to work the land within a certain number of days from the basic work to the end of sowing, as imposed by GAEC 6.

In Romania, in 2023, we also faced severe drought and hot weather conditions, which caused an accelerated increase in the evapotranspiration process. Therefore, without having water - *moisture* in the soil, the farmer can try to establish a catch crop for the sensitive period provided by GAEC 6, but it does not have the conditions for the seeds to sprout and the result is only an expense on the part of the farmer, without bringing any benefit for the environment. Also related to this GAEC 6, in the absence of precipitation, the soil has hardened and in order to carry out land preparation for establishment of autumn crops, tillage is needed to allow the breaking and penetration of the soil. So, we are talking about an aggression against the soil, increased fuel consumption for tillage and dust pollution. At the same time, we were also talking about machines destroyed, due to the hard ground.

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Accordingly, to GAEC 7 it is allowed monoculture only between the succession of the same plant on the same area, only if we sow a secondary crop. But, in case of drought, the effect of this secondary crop in terms of interrupting the life cycle of diseases and pests or other benefits brought to the environment, are null. If over the summer there is not enough precipitation, as happened in 2023 and we have all the prevision also for 2024, based on the reserve of the water in the soil, this secondary crop, it will not sprout, so it is as if we had not sown anything. If we have precipitation and sprouting, in the absence of phytosanitary protection, this crop will get sick, which means that the pressure of diseases and pests on the respective soil will increase, which will cause a greater consumption of pesticides in the next year's crop. So where is the environmental protection?

Referring to GAEC 8, how can we imagine that in all MS the cover crops and protein crops can resist the current climatic conditions without phytosanitary treatments? Pedological conditions are very different even within the same MS territory, and this is why we also have regional NSP. Let's not forget that **pesticides are medicines for plants and that without access to these curative or preventive treatments, the risks to human health are infinitely higher.**

In fact, for this "non-productive area" in case of Romania, that had a lot of fallow land before 2007 and made a lot of effort to bring them into production, we are facing the pressure of a huge weed seed reserve in the soil. So, for this area, farmers are required to apply sanitation operations on the land, they do not cultivate, and under no circumstances they leave this land "fallow". The costs of sanitation operations are not covered by the European subsidies. These subsidies do not cover the land rent, local taxes, or depreciation. In the CAP 2021-2027, the value of the cumulative subsidy per hectare decreased compared to the previous National Strategic Program. Under these conditions, what should farmers do? How can they still produce and remain sustainable when their income cannot cover the costs of their efforts? Does it seem attractive for the young generations to work for a lower income and less benefits, just to populate our rural areas? The answer is NO, and, in this situation, there is no rurality without farmers!

So, as farmers, **we have serious concerns when it comes to the impact that the severe weather conditions have had on the agricultural practices and the current and future implementation of some CAP requirements** (conditionality, eco-schemes, agri-environment-climate commitments).




Therefore, we need a common timely action and a common approach for all European farmers. **We consider it urgent that the European Commission provides for the necessary derogations to the CAP conditionality rules, eco-schemes and agri-environment-climate commitments in 2024 as a consequence of the prolonged impact of extreme weather conditions.**

We would like to thank you for considering our requests and remain available for further information, if necessary.

On behalf of all members and member organizations,

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