

Brussels, 8 March 2016

**FoodDrinkEurope response to the public consultation on the experience with the first year of implementation of greening obligations under the direct payment scheme (CAP)**

***Section II Agriculture, environment and climate***

\* Do you agree or disagree that the environment in agricultural areas should be protected?

- X Strongly agree  
Slightly agree  
Neutral  
Slightly disagree  
Strongly disagree  
No opinion / Don't know

\* Do you agree or disagree that agriculture should contribute to climate change mitigation efforts?

- X Strongly agree  
Slightly agree  
Neutral  
Slightly disagree  
Strongly disagree  
No opinion / Don't know

\* Do you agree or disagree that farmers should be rewarded financially for adhering to environmentally/climate- friendly farming practices and, ultimately, for the delivery of environmental public goods?

- Strongly agree  
Slightly agree  
Neutral  
Slightly disagree  
Strongly disagree  
X No opinion / Don't know

Fields marked with \* are mandatory.

***Section VII Other issues - Are there any other issues that you wish to address which have not been covered?***

FoodDrinkEurope welcomes the Commission public consultation with a view to evaluate greening after the first year of implementation. The food and drink industry is a key partner of EU farmers and has a central role in promoting sustainable sourcing practices within food supply chains.

Because of the nature of our membership, we are not in a position to give an opinion on farmers' own experience with the implementation of greening. This is why we refrain from responding to the practical and detailed questions asked in the consultation.

However, we would like to use this opportunity to express our views to ensure that greening delivers added value at European level.

Firstly, in order to ensure fair competition between farmers and the businesses downstream, greening should be applied consistently across the EU. Farmers should be given the same options to achieve environmental benefits in the most effective way taking into account their agricultural situation.

Secondly, attention should be paid that the overall results of greening are coherent with all the objectives of the CAP. Instead of taking land out of production or growing crops without responding to a market demand or local farming practices, there is a need for measures which contribute to the environment as well as the market orientation and the competitiveness of agriculture.

Hence, once sufficient evidence is collected to run a sound analysis, we ask the Commission to thoroughly evaluate the cost-effectiveness of greening, also considering the links with other environmental measures in the CAP and the differences in the national implementation. In particular, the Commission should look whether the three greening practices

- Are target-oriented;
- Enable farmers to achieve efficient production as well as have tangible environmental benefits; and
- Are based on adequate enforcement measures.

Finally, the food and drink industry is increasingly committed to reducing the environmental impact of its own operations and beyond, by working with farmers to encourage the development and implementation of good agricultural practices. The CAP should acknowledge these voluntary initiatives and facilitate sharing good practices and pursuing the same objectives across the food chain and up to the consumers.