



COMMISSION OF THE EUROPEAN COMMUNITIES

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Annex IV - Written contributions

COMMISSION STAFF WORKING DOCUMENT

**Proposal for a Council Regulation on support to Rural Development by the
European Agricultural Fund for Rural Development**

EXTENDED IMPACT ASSESSMENT

{COM(2004)490 final}

Written contributions from the organisations represented in the Rural Development Advisory Committee

PREPARE : Pre-Accession Partnerships for Rural Europe

The PREPARE programme aims to strengthen civil society and to promote multi-national exchange in rural development, notably in the 10 accession countries of Central Europe, of which 8 joined the European Union in May 2004.

Rural development is most successful and sustainable where strong partnerships are created at national and local level, and where local people are actively involved in the process. But in the accession countries civil society, in the sense of active local democracy and non-government organisations (NGOs), is not yet always strong enough to be trusted by governments as an active partner.

PREPARE aims to strengthen civil society in rural areas; and to promote dialogue, trust, confidence and co-operation between local actors, governments and all stakeholders of rural development, at all geographic levels. We wish to see rural communities empowered to participate in decision-making related to sustainable rural development.

These aims are pursued by :

1. COUNTRY-SPECIFIC NATIONAL PROGRAMMES.

These promote dialogue and co-operation between different actors in rural development. The programmes vary according to the needs of each country, but may include national seminars, regional workshops and other exchanges, all leading towards a structure of cooperation which can bring lasting benefits. The first PREPARE national programme was launched in 2001 in **Slovenia** : this led to the creation of the Slovenian Rural Development Network. We have supported programmes in the **Czech Republic, Poland and Latvia**

2. MULTI-NATIONAL EXCHANGES

Annual all-country meetings. We organised three successful Travelling Workshops – to **Estonia and Sweden** in 1999, **Hungary** in 2000, **Finland** in 2002 – which enabled key people in the pre-accession countries to see and discuss the active

involvement of local communities in rural development. We aim to organise one event of this kind each year, in order to bring together people from the 10 countries, to stimulate debate and to review the PREPARE programme. In October 2003, we held in **Slovakia** the first multi-national Gathering of the PREPARE Network, preceded by Travelling Workshops which started in all the accession countries. The next Gathering will be held in **Bulgaria** in September 2004.

Regional exchanges. We support regional links between the 10 accession countries. For example, regional Conferences were held in **Romania** and in **Lithuania** in 2001. An active link is developing between Kodukant in **Estonia** and people who wish to start national rural movements in **Latvia** and in **Lithuania**.

Links with EU countries. We promote visits and exchanges of information and best practice between EU member states and accession countries. For example, an active exchange between **Finland** and **Estonia** has recently started.

3. INTERNATIONAL NETWORKING.

We have set up a formal **PREPARE Network**, to enable exchange and mutual support between all who are interested in rural development throughout Europe. This is served by our Website, **www.PREPARENetwork.org**

The PREPARE programme is funded from a variety of sources, public and private. The current expansion of the work has been funded by a generous grant from the C S Mott Foundation. The **PREPARE Organising Group** consists of Forum Synergies; ECOVAST, the European Council for the Village and Small Town; the Swedish Popular Movements Council; the Swedish Federation of Rural Economy and Agricultural Societies; Kodukant, the Estonian Movement of Villages; the Hungarian Rural Parliament; the Slovakian Rural Parliament; the Slovenian Rural Development Network; the Polish Forum on the Animation of Rural Areas; and the Finnish Village Action Movement.

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Rural development policy post 2006

Provisional note on the EU-Commission's Extended Impact Assessment

offered by the PREPARE partner organisations

This provisional comment from the pan-European network PREPARE (Pre-accession Partnership for Rural Europe) builds upon two earlier submissions – our letter to the Commission dated 5 February 2004, and our memorandum to DG-Agri of 30 April 2004 – and upon our participation in the Rural Development Advisory Committee meeting of 25 May 2004.

The Commission's assessment provides proof of the importance of rural areas. It justifies the creation of a distinct European Rural Development Policy defined by the EU for the enlarged European Union.

1. OBJECTIVES

We note the statement of objectives in the Assessment : but we wish to see these amended in an integrated way. We believe that 2007 should mark the ‘coming of age’ of the European Rural Development Policy as the leading instrument of rural development in the Union, complementary to both the CAP and the Structural and Cohesion Funds. We therefore urge that the strategic goal of the European Rural Development Policy be rephrased to read (*amended text is shown in italics*) :

“To promote the sustainable development of all rural areas throughout the enlarged EU, in a manner complementary to the CAP and the Structural and Cohesion Funds, by

- increasing the competitiveness of the agricultural sector based on economic, environmental and social elements of sustainability through support for improved rural infrastructure;
- enhancing the environment *and the diversity of rural areas* through support for *agro-environmental and land management programmes* (including RD actions related to Natura 2000 sites);
- enhancing the quality of life in rural areas and promoting diversification of economic activities *and income opportunities in all rural sectors*”.

2. PRINCIPLES

We suggest the ‘orientations’ stated in the Assessment should be expressed as principles, and elaborated as follows, in order to guide the Commission’s choice among policy options.

The principles should include :

- (a) Simplification of the delivery system. Simplification must lead to a timely programming-, approval- and spending- practice of RD programmes, with increased flexibility within programmes and increased transparency and participation of the rural population. In particular, systems must be simpler at point of delivery to the beneficiaries (too many existing EU programmes are grossly delayed, underspent or ineffective because they are far too complex for people to understand). However, the Commission should not withdraw from the role of setting legally binding political and spending guidelines for integrated rural development programmes of the member states.
- (b) Partnerships between public and private organisations and civil society. We strongly endorse the text on this, but would like to see more concrete suggestions on how this can be achieved in collaboration with the member states.
- (c) Coherence and complementarity between RD policy and other EU policies. The proposals in the document do not adequately state how this coherence and complementarity are to be achieved.
- (d) Integration, within the RD programmes at local level, between social, economic and environmental objectives and between sectors in local economies. We place high importance on this, for reasons stated in our earlier submissions.
- (e) Territorially targeted local development strategies. Such strategies are an essential component of a rural development policy, and should therefore be stated as a principle in part 2 of the paper.

3. THE LEADER APPROACH

Three of the above principles – partnership, integration, and territorially targeted local development – have been widely and effectively pioneered by the successive phases of the LEADER Initiative. Our view of LEADER beyond 2007 is that it should be effectively mainstreamed by bringing those principles into all rural development programmes, not by insisting on a small proportion of ‘LEADER-type’ activity in an otherwise unleavened policy.

We therefore suggest that all ‘territorially targeted local development strategies’ should be based on the LEADER principles, and should be open to measures of Axis 1 and 2; and that a minimum of 2% of the funding in each national rural development strategy should be reserved for innovative approaches, cooperation between territorial LAGs, and a national network to support the LAGs and to interact with the European

Observatory. In the new member states, a further 2% of the funding should be allocated to support for the creation and capacity-building of local partnerships.

Option 2

We support a more strategic approach (Option 2) for the following main reasons :

- (a) It involves the Commission setting out the EU priorities for the three policy axes and the member states responsible for national rural development strategies to translate the EU priorities to the national situation after stakeholder consultation. We believe that this is an essential and transparent way to ensure the sound allocation of EU funds. The Rural Development Fund may total 11 billion euros per year, rising in real terms to over 14 billion by 2013 : the EU has a duty to all European citizens and taxpayers to ensure that EU funds of this magnitude are deployed in a manner that meets European objectives.
- (b) It provides for a clear indication, through the national rural development strategies, of how the RD programmes would complement other EU policies and programmes, notably the Structural and Cohesion Funds.
- (c) It provides for a quantified balance between the three Axes of rural development. We accept the proposed figure of at least 20% of total programme funding for each Axis. In particular, we wish to see a continued obligation upon member states to allocate funds to agri-environment programmes; and a clear commitment to Axis 3, since this Axis is the most likely to produce new employment, thus addressing the underlying cause of social and economic weakness in many rural areas.
- (d) It provides for the Axis 3 measures to be implemented through territorially targeted local development strategies. We strongly support this approach, and would wish to see the EU offering clear guidance to member states on the approach to the assessment of need, and to the selection of territories and of the measures to be applied to them.

4. EUROPEAN RURAL DEVELOPMENT OBSERVATORY

We strongly support the creation of a European Rural Development Observatory as proposed in Option 1. We conceive the main tasks of the Observatory to be to encourage exchanges of best practice in rural development and to provide technical assistance for networking and cooperation among territorial Local Action Groups and other RD actors. An Observatory, with this brief, should be run on the lines of the LEADER 2 Observatory, with the ability to publish and disseminate its own material, organise transnational seminars etc : it should not be constrained in the manner that applies to the recently-contracted LEADER+ Observatory.

5. MONITORING AND EVALUATION

We note the contrast between the proposals for monitoring and evaluation at Option 1 (paragraph 2.3) and Option 2 (paragraph 3.3). Of the two approaches, we prefer that stated at Option 2, which provides for annual reports from member states and an EU-level report (also annual, we assume) leading as necessary to proposals to adjust the EU strategy.

We do not agree with the proposal, at Option 2, that the European Rural Development Observatory, with the tasks outlined in our preceding paragraph, should also be responsible for collecting and processing monitoring data, organising an evaluation network, and providing technical expertise for the assessment of agri-land management payments levels under Axis 2. These duties would (we believe) compromise the Observatory's supportive relationship with the territorial LAGs and other RD actors. If these duties are delegated by the Commission, they should be contracted to an agency separate from the Observatory.

6. THE ROLE OF NON-GOVERNMENT ORGANISATIONS

We urge that member states be required to bring NGOs into full, timely and genuine consultation on rural development measures as they are being formulated, and on periodic reviews of these measures. NGOs should be represented on Monitoring Committees of EU funded programmes. Governments should be encouraged to give NGOs a role to advise on how to simplify the ground-rules of rural development programmes, to interpret those ground-rules to the stakeholders, and to mediate between stakeholders and government. If NGOs are so involved, their reasonable costs should be covered from the programme budgets. NGOs may be able to act as intermediate bodies on certain programmes.

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(ARGE Dorf)

Stellungnahme zum Positionspapier

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| <p>EXTENDED IMPACT ASSESSMENT</p> <p>RURAL DEVELOPMENT POLICY POST 2006</p> <p>PARTS 1 – 3</p> |
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Sitzung der Beratergruppe am 25. Mai 2004 in Brüssel

1. ZU DEN OPTIONEN 2 UND 3 (STRATEGISCHER & TERRITORIALER ANSATZ)

Die Zielsetzung einer entsprechenden Vorbereitung oder besser Aufbereitung der einzelnen Maßnahmen erscheint als sehr wesentlich (Erfolg = Massnahmen x Methoden). Die zusätzlich angestrebte Vernetzung und Bündelung der Maßnahmen erhöht ebenfalls die angestrebten Verbesserungen. Entscheidend wären aber auch zusätzliche Vorgaben im Programm. Zum Beispiel

- Investitionen zur Stärkung der Wettbewerbsfähigkeit sollten an ein Mindestmaß an Umwelt – und Landschaftsleistungen ebenso wie umgekehrt
- Förderungen für Umwelt – und Landschaftsleistungen an ein Mindestmaß an ökonomisch – landwirtschaftlich orientierte Wertschöpfung gebunden werden. (keine Umweltförderungen an Betriebe, die nur „scheinbar“ wirtschaften)

Wichtig ist auch die Betonung von Regionalprojekten, weil dadurch maßgeschneiderte Projekte für die unterschiedlichen Erfordernisse erreicht werden können. Vom Grundsatz her muss es immer mehr um integrative Lösungen gehen, die jedoch keine „Überbürokratisierung“ erzeugen dürfen.

Die vorgeschlagene Verankerung eines Strategiedokumentes bringt aber möglicherweise das Risiko solch einer „Überbürokratisierung“ mit sich. Damit treten in aller Regel „professionelle Dokumenteverfasser“ auf den Plan und erzeugen zwangsläufig top down Lösungen, die noch dazu viel Geld kosten. Deshalb wird ein gesplitteter Fördersatz zur Diskussion gestellt:

- Geringerer Fördersatz für top down Lösungen

- Höherer Fördersatz für bottom up Lösungen verbunden mit oder gebunden an zertifizierte Lehrgänge, Bildungsinitiativen und Arbeitskreisarbeit in Richtung Moderation, Animation, Arbeitskreisleitungen usw. sowie transregionaler und transnationaler Erfahrungsaustausch mit know how Transfer für lokale oder regionale Akteure zur Herstellung der angestrebten Kohärenz der einzelnen Maßnahmen

2. ZUR ACHSE „STÄRKUNG DER WETTBEWERBSFÄHIGKEIT“ (IN ALLEN 3 OPTIONEN)

Hier sollte sehr klar betont werden, dass es nicht nur um eine Verbesserung der „Produktionswettbewerbsfähigkeit“ im Hinblick auf Weltmarktbedingungen gehen darf, sondern auch um eine Verbesserung der Wettbewerbsfähigkeit durch **Einbindung der Landwirtschaft in regionale Wertschöpfungsketten**

Dadurch wird erreicht.

- Automatische Verstärkung der Bemühungen zur Bündelung und Vernetzung der einzelnen Maßnahmen – wesentliche Steigerung der Effizienz der eingesetzten Mittel sowie der Nachhaltigkeit und Beständigkeit der Maßnahmen.
- Stärkung der Wettbewerbsfähigkeit der kleineren landwirtschaftlichen Betriebe auf Basis einer erhöhten direkten und indirekten Wertschöpfung für den einzelnen Betrieb bei gleichzeitiger Gesamtwertschöpfung in und für die jeweilige Region. Das erscheint gerade für Länder mit kleinstrukturierten landwirtschaftlichen Betrieben, die bereits jetzt verstärkt auf agrarische Umweltprogramme mit vernetzten Ansätzen abgestellt haben, sehr wesentlich. Hier würde eine ausschließliche Stärkung der Wettbewerbsfähigkeit für den globalen Markt einer ländlichen Entwicklung oftmals entgegen laufen – durch vorprogrammierte Konflikte zu Umwelt, Landschaftsbild, Landschaftshaushalt, Tourismus und vor allem durch den gesteigerten Verlust von Arbeitsplätzen im ländlichen Raum.

3. GRUNDSÄTZLICHE ANMERKUNGEN

Für die Ausrichtung der GAP nach 2006 sollte im Sinne eines gesamteuropäischen Agrarmodells von Brüssel der Rahmen definiert sein.

- Dieser Rahmen sollte nicht zu eng sein, damit nationale und regionale Spielräume für eine Anpassung an die jeweiligen Gegebenheiten und Bedürfnisse offen bleiben
- Dieser Rahmen sollte auch nicht zu weit sein, damit nicht durch national sehr unterschiedliche Auslegungen und Anwendungen die letztlich erreichte Linie unterlaufen werden kann.

Das „Was“ muss daher klar und verbindlich von Brüssel formuliert sein, das „Wie“ soll aber offen bleiben.

2004-06-04

Dipl.-Ing. Peter Schawerda
(ARGE Dorf)

WWF Initial Response to the European Commission – DG Agriculture

9th June 2004

Extended Impact Assessment: Rural Development Policy Post 2006

On the occasion of the Rural Development Advisory Committee held on May 25th 2004, DG Agriculture presented an impact assessment options paper on the future of rural development policy post 2006. WWF welcomes both the initiative taken by DG Agriculture to produce an Extended Impact Assessment, and the invitation offered to stakeholders to comment on this paper.

The Extended Impact Assessment document sets out important thinking for the future of the Rural Development Regulation (RDR). Indeed the paper seems to outline more developed concepts than any other papers produced to date by DG Agriculture on the future of the RDR post 2006. As such, the status of the paper remains unclear to WWF.

In particular, it is unclear what status this Impact Assessment has vis-à-vis the questions outlined by DG Agriculture at the ad hoc Rural Development Advisory Committee held on March 30th. It is unclear whether this paper is outlining a defined set of options, whether the options enjoy the same status, or indeed what is some of the thinking behind the development of the three options.

In the light of such uncertainty, this response represents only an *initial* response by WWF. It should also be read in conjunction with the broader set of concerns raised by a coalition on NGOs in a letter addressed to Commissioner Fischler on June 7th. As in the letter to Commissioner Fischler¹, WWF is seeking further dialogue with the services that have produced the Extended Impact Assessment at the earliest opportunity.

General Observations on Process

- 1) WWF welcomes the initiative taken by DG Agriculture to produce an Extended Impact Assessment (EIA) on the future Rural Development Regulation post 2006, and the invitation offered to stakeholders to comment on this paper.

¹ This letter is provided in annex 1 to this note.

- 2) WWF also welcomes the introductory portion of the paper which looks at the range of challenges and constraints the EU's rural development policy is faced with, in particular the analysis of environmental challenges. This is a useful scene-setting exercise.
- 3) However, WWF is concerned that DG Agriculture is not providing a clear process for stakeholder involvement in the development of the revised RDR. The Impact Assessment paper was circulated one week ahead of the advisory committee without any guidelines as to its status vis-à-vis other processes currently underway on RDR thinking (e.g. the Salzburg conference recommendations or the questionnaire produced by DG Agriculture for the ad hoc Rural Development Advisory Committee held on 30th March) or DG Agriculture's expectations from stakeholders.
- 4) The EIA paper builds on the issues discussed at the Salzburg conference *Europe's Rural Futures* held last November. This paper, however, provides a significantly more detailed *interpretation* of the issues discussed in Salzburg. It narrows down implementation approaches, financial priorities, and the relative responsibilities of Member States and of the European Commission.
- 5) Although the paper was welcomed, it was un-expected. As such, one week was not sufficient time for a concerted response to be organised in time for the committee meeting, nor a prioritisation amongst the three options the paper outlines.
- 6) Nonetheless, at the conference on the future of Biodiversity Action Plans held in Malahide on 25th-27th May, DG Agriculture reported the advisory committee as having been supportive not only of the fact that an Extended Impact Assessment had been carried-out, but also that there was generalised support for option 2 presented in the paper.
- 7) However, significant concerns regarding option 2 have been jointly expressed by environmental, developmental, organic farmers and animal welfare NGOs in the above-mentioned letter addressed to Commissioner Fischler. Therefore, WWF believes that it is premature to consider that option 2 is widely supported, and urges DG Agriculture to take into consideration both the issues highlighted in the letter to Commissioner Fischler and the further issues highlighted below.

Overarching Considerations

Financial Strengthening of the Second Pillar.

- 8) The revision of the RDR is happening in parallel to the negotiations on the future financing of the EU for the period 2007-2013. Indeed COM 101 clearly outlines the three priority axes that the CAP as a whole (comprising both pillars one and two) should deliver upon: competitiveness, land management and wider rural development. However, the EIA paper clearly, and rightly, states on page 17: "An EU rural development policy could never hope to deal with the full range of problems facing rural areas".

- 9) The status of the financial negotiations clearly suggest that a financial strengthening of the second pillar will be hard to achieve. In the light of this, it is of the utmost importance that the RDR does not try to deliver everything, but focuses its financial resources to those priorities which are enshrined in EU legislation and which are not otherwise served by the first pillar payments. Too many objectives, each with a minute budget behind it, will not be able to deliver. This will further frustrate support for second pillar policies and could lead to their ultimate abandonment.
- 10) Given the context of the financial perspectives, it is imperative that DG Agriculture take every opportunity to demonstrate the need for a robust and financially strengthened second pillar, as well as an effective and efficient strategy for delivering targeted and tangible results through pillar two investments. A section outlining the need to financially strengthen pillar two above and beyond current modulation opportunities must be included in the EIA paper, and in all future communications and proposals on the future RDR.

Overarching Objective.

- 11) The “Part 2 – Setting the Objectives” section of the EIA paper should also be revised. At present it proposes that the strategic policy goal for the EU’s rural development policy be “to accompany and complement CAP market policies in the overall aim of supporting the sustainable development of all rural areas throughout the enlarged EU”.
- 12) WWF recommends that this should be revised to explicitly refer to *support environmental integration and conservation, as well as the socio-economic development of all rural areas throughout the enlarged EU.*
- 13) Furthermore, in the light of the EU’s commitment to an increasingly market-driven farming sector and the on-going stances taken by the EU in the context of the Doha Development Round of the WTO, WWF recommends that the RDR should not aim to complement the CAP market policies. For the long-term maintenance of green box payments, within which RDR payments fall, it is imperative that RDR expenditure be seen as not linked to production choices or patterns; and to be effectively delivering on societal priorities such as the environment.

Axis 2 – Agri-Environment & Less-Favoured Areas.

- 14) The EIA paper outlines in useful detail the range of environmental challenges and obstacles the RDR is confronted with. However, the options presented in “Part 3 – Achieving the Objectives” do not live up to the severity of the challenges outlined. Nor do they reflect the fact that the environmental priorities described have been written into EU legislation and further commitments towards achieving their objectives written into the Treaty (articles 2 and 6) as well as in European Council agreements, such as that reached in Gothenburg in 2001, to halt biodiversity loss in Europe by 2010.
- 15) The current obligation for all Member States to implement the agri-environment measure must not be revised. Despite its difficulties and the questionable nature of

some agri-environment schemes, overall they have provided an essential mechanism for environmental delivery across Europe. Their compulsory nature has also ensured that all Member States address environmental integration issues, thus ensuring greater steps towards sustainable development in the rural development plans.

- 16) Agri-environment schemes must be made available across the whole territory of the Union, and not targeted to limited zones. Despite, for example, the absolute necessity to support the implementation of Natura 2000, it would be mis-guided to limit agri-environmental schemes solely to Natura 2000 sites. This would severely compromise the capacity of the second pillar to contribute to the range of environmental priorities the EIA document lists on page 21 as needing RDR support: “combating climate change, enhancing biodiversity and water quality [...]”.
- 17) The funding available for agri-environment should not be limited. The true costs of delivering even on the limited range of environmental priorities related to, for example, the Water Framework Directive, halting biodiversity loss by 2010 or combating climate change; have not been assessed.
- 18) A Commission mandated working group looked last year into the costs of implementing Natura 2000. This group concluded that implementing Natura 2000 would cost approximately € 6 billion per annum. Although the RDR may not be the only source for this funding, the group recommended that the RDR should be a substantial contributor to Natura 2000. Yet even only for this priority, the sums required are close to the total annual budget available for the whole RDR. Hence the need to not limit the amount of money Member States may choose to dedicate to environmental priorities, by obliging expenditure on other axes.
- 19) Furthermore, agri-environment payments should not continue to be based on the income foregone approach. They should become true payments for environmental services, and be provided at levels which truly reflect the cost of the services provided.
- 20) Co-financing rates for agri-environment must not be renegotiated so soon after the agreement, under the Mid-Term Review of the CAP in 2003. A reduction of the rate of Community co-financing would discourage those old and new Member States which have elaborated rural development plans with sizeable agri-environmental programmes, based both on the compulsory nature of the measure and the agreed high co-financing rates. For the Commission to be proposing to over-turn a decision taken less than a year ago would create an enormous wave of skepticism in DG Agriculture’s commitment to environmental integration.
- 21) The Less-Favoured Areas (LFA) measure must be tied to supporting High Nature Value (HNV) farming systems. The importance of HNV farming systems has been amply stated, recently again in the 2003 CAP Mid-Term Review, and in a recent European Environment Agency report². However, first pillar measures remain skewed

² EEA Report N° 1-2004 High Nature Value Farmland: characteristics, trends and policy challenges

primarily in favour of the economically competitive farming sectors. The EEA report clearly states on page 15 that: “The increased focus on sustainability and non-trade justifies more investment in those areas that represent the highest environmental quality and are more vulnerable to change. The targeting of high nature value farmland areas should be improved”.

- 22) There is an urgent need to tie LFA schemes to HNV farming systems. LFA site designations should not be based on criteria such as physical handicaps, as is suggested in the EIA paper ; but on the environmental and/or social values that need maintaining and the types of system that do this best.

Good Farming Practice.

- 23) The baseline for axis 2 payments should not become cross-compliance, but remain good farming practice. Moving towards cross-compliance for agri-environment and LFA payments would weaken the difference between the benefits which society is ready to pay for and those practices which are expected of farmers as a sustainable basis for their production.
- 24) Although there is a need to streamline the range of standards farmers are subject to, in order to increase the effectiveness of practices and standards; we need to recognise that Good Farming Practice has a breadth of coverage in most Member States which is much more comprehensive than cross-compliance, for example often covering a broader spectrum of water pollution and landscape protection measures than currently included under either annexes 3 or 4 of the Horizontal Regulation. Therefore, a simple replacement of GFP by cross-compliance would, *de facto*, mean a step backwards in the standards applied by many Member States.
- 25) Finally, it remains unclear to which standards would be subject those farmers who opted out of pillar one payments, but did apply for and receive pillar two payments, since cross-compliance –as currently written in legislation; would not apply to them.

Shared EU and Member State Responsibility.

- 26) WWF supports the statement on page 18 of the EIA paper that the CAP must remain a *common* policy, i.e. that: “... the choice has been made to organise the agricultural sector at EU level”. Common objectives, which include a clear commitment to environmental delivery, must be agreed at EU level. Furthermore, the European Commission must remain the guardian of these common objectives. This means that the Commission must keep responsibility for ensuring Member States develop rural development plans that deliver against the full range of commonly agreed objectives, and that the measures implemented are effective.
- 27) A common objective should be compulsory expenditure for all Member States in support of implementation of both Natura 2000 and the Water Framework Directive. Both are priority environmental legislation at EU level, which are entirely dependent on

alignment of the farming sector in order to be effectively implemented. This needs to be explicitly expressed in the RDR.

- 28) However, the role and responsibilities of the Commission should be limited where the identification of national priorities, the design of plans and of specific measures are concerned. Member States should carry greater responsibility in explaining and justifying their choices of priorities and measures.
- 29) The responsibilities of Member States should include, for example, provisions obliging them to identify national priority HNV farming areas or systems and allocate sufficient money to them under their rural development plans 2007-2013. Or the obligation to assess the financial needs associated to implementing Natura 2000 at national level, and to report to the Commission how the RDPs proposed address these needs.
- 30) WWF supports the EIA paper's concept of potentially establishing a rural observatory and an increased role for the Commission in monitoring and evaluation. However, in particular for monitoring and evaluation WWF believes that the Commission's task will be rendered extremely weak unless it has at its disposal means to disallow payments to those Member States who do not show effective delivery against commitments taken.

Brussels, 7 June 2004

Dear Commissioner Fischler,

EXTENDED IMPACT ASSESSMENT: RURAL DEVELOPMENT POLICY POST-2006

BirdLife International, WWF, the European Environmental Bureau, IFOAM, Friends of the Earth Europe (FoEE), Greenpeace and Eurogroup for Animal Welfare are extremely concerned about the options for Rural Development post-2006 set out in the above document on which the Advisory Committee on Rural Development was recently consulted. Some of the options as proposed in the document would lead to a severe weakening and restriction of the agri-environment framework in Europe.

We are writing to ask you to renew your support for environmental protection and biodiversity conservation, maintaining flexible, compulsory agri-environment schemes available EU-wide as an essential aspect of multi-functional agriculture. The disintegration of the environmental aspects of the CAP would be in complete contradiction to the EU's Gothenburg commitment to ending biodiversity declines by 2010. The whole environment and rural community will suffer as a result of weak environmental integration into pillar two.

If EU commitments to environmental protection are to be met, the agri-environment programme will need to be strengthened, not weakened. We are concerned that the three options outlined suggest a weakening of the role and the extent of agri-environment.

Our key concerns are:

- (1) Option 2 proposes that agri-environment schemes will be restricted and that schemes outside a narrowly defined range of geographically restricted areas will have a reduced role. This is unacceptable. Many agri-environment schemes that currently protect high nature value farmlands areas would be eliminated as a result. Member States and environmental experts must have the flexibility to tailor schemes to best deliver for specific environmental priorities wherever they occur.
- (2) Option 2 implies that agri-environment programmes would be optional for Member States. This is unacceptable. Farmers in every country must be offered support for their vital conservation, work and new Member States just starting their programmes should be encouraged to overcome any initial difficulties and not be offered the get-out option of non-implementation immediately.

- (3) Option 2 proposes to remove Good Farming Practice as the minimum requirement for agri-environment and Less Favoured Area payments and replace it with cross-compliance. This is unacceptable, as it would result in the loss of environmental standards for the majority of EU farmland.
- (4) Option 2 prescribes that 20% of RD funding has to be allocated to each of the three axes of competitiveness, land management and wider rural development. This is unacceptable. Without a major increase in Pillar II funds the Member States who have allocated more than 60% of their Rural Development budget to agri-environment and LFAs management (e.g. the UK, Austria, Finland, Ireland and the Czech Republic) will be forced to cut their spending in these areas.
- (5) The paper proposes that for all options, Commission co-financing rates will be reduced from those agreed under CAP reform in 2003. This is unacceptable. Rural development schemes should be financially appealing to Member States, and the Commission should not propose now to overturn decisions reached by the Agriculture Council less than a year ago.
- (6) Both Options 1 and 2 are unclear about the role of LFAs and their designation. LFAs should be reviewed and re-established according to environmental objectives and targets.

Despite an incomplete and limited stakeholder consultation, the emphasis given to Option 2 implies that this will be the most likely to influence the next Rural Development Regulation. We feel that to arrive at this conclusion without more extensive discussion and analysis is premature. We urgently request a meeting between yourself and representatives of our organisations to discuss these concerns.

We welcomed the gains made for the environment and animal welfare under your leadership and in the last CAP reform. We urge you to maintain the momentum towards a greener, simpler, fairer CAP, and ensure that agri-environment programmes are both strengthened and retained in the interest of all European citizens.

Yours sincerely,

Clairie Papazoglou, Head of EU Policy, European Community Office, BirdLife International

Also for:

Tony Long, Director, WWF European Policy Office
John Hontelez, Secretary General, European Environmental Bureau
Martin Rocholl, Director, Friends of the Earth Europe
Francis Blake, President, IFOAM EU Group,
Graham Wynne, Chief Executive of RSPB/BirdLife
Sonja Van Tichelen, Director, Eurogroup for Animal Welfare
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Farming for Life is BirdLife International's Campaign to make Europe's agriculture sustainable, protect natural resources and to save our disappearing farmland birds

CONSULTATION ON

EXTENDED IMPACT ASSESSMENT: RURAL DEVELOPMENT POLICY POST 2006 (PARTS 1-3)

**presented by the European Commission on the 25th May 2004
at the Advisory Committee on Rural Development**

RESPONSE FROM BIRDLIFE INTERNATIONAL

The BirdLife International Partnership in Europe is active in over 40 countries, with a full regional conservation programme including research and action to protect different bird species, the sites they inhabit and the habitats that they need to survive.

This response is from NABU: Naturschutzbund Deutschland (BirdLife Germany) and LIPU - Lega Italiana Protezione Uccelli (BirdLife Italy) in their role as members of the Advisory Committee on Rural Development. The views expressed here represent the views of the European BirdLife International Partnership.

Summary

BirdLife International welcomes the opportunity to take a strategic overview of Rural Development policy but is concerned about several aspects of the options proposed in the EIA. It is unclear how the options as set out will become the primary mechanism for delivering sustainable land management and rural communities across Europe. In particular, the key role of agri-environment schemes at the heart of RD policy should be recognised and extended.

BirdLife International recommends:

- That the strategic policy goal of RD is strengthened to explicitly support environmental conservation and socio-economic development in all rural areas throughout the enlarged EU.
- That a full analysis of the impact of the 3 options on the current portfolio of RD programmes, at either European or Member State level, is carried out as a matter of priority.
- That a full analysis of funding requirements to meet Europe's existing RD targets should be carried out. This should be used to set objectives for providing adequate RD funds through future fund-switching from Pillar I to Pillar II and through rationalisation of the LEADER and Structural Funds.
- That Commission co-financing rates should not be reduced below those agreed during the CAP reform negotiations in 2003.
- That the role of LFAs in a post-decoupling policy environment are clarified, and that LFAs are reviewed and re-established according to environmental objectives and targets.
- That agri-environment schemes remain compulsory for all Member States, and that their role at the core of the RD programme is expanded and reinforced to become the primary mechanism for supporting sustainable land management.
- That agri-environment schemes are not restricted by site-based targeting mechanisms imposed by the Commission, and that Member States retain the flexibility to develop outcome-led schemes targeted on national and regional environmental priorities.
- That the Commission commits to reviewing the income foregone / costs incurred payment system with the intention of developing a new mechanism which recognises the value of the environmental services provided.
- That GFP and cross-compliance are harmonised by applying the GFP standards more widely, and that GFP is not abolished as this would undermine the basis for many Pillar II schemes across Europe.
- That without a major increase in RD funding, agri-environment spending should not be limited to 60% of RD funds as this could result in spending cuts for countries with large agri-environment programmes.

EXTENDED IMPACT ASSESSMENT: RURAL DEVELOPMENT POLICY RESPONSE BY BIRDLIFE INTERNATIONAL

BirdLife International welcomes the opportunity to comment on the Extended Impact Assessment of Rural Development Policy Post 2006 (parts 1-3). The document sets out important concepts for the future of Rural Development policies and Europe's rural areas. It is vital that the ideas and options within it are analysed and debated fully, by all stakeholders, to ensure that the decisions which follow will lead to a more sustainable future for Europe's rural areas.

BirdLife International's Rural Development vision is attached at Annex 1.

Part 1: What 'Problem' does Rural Development Policy Address?

The EIA contains a useful summary of the evolution of Rural Development (RD) policy in Europe. We welcome the acknowledgement of the status of farmland bird populations across Europe and the link between wild bird populations and agriculture.

However, we feel that this section should more clearly answer its own question. The 'problem' is that rural activities and land management (especially agriculture) generate products for which the actors cannot recoup any value, but which nevertheless are important public benefits, goods and services. These include: biodiversity; landscape; healthy soil, air and water; rural communities and the basis for rural businesses such as rural tourism. The fact that these public benefits cannot be sold in a conventional way means that they will only be produced as a by-product of rural activities, if at all, and many of them are in decline as a result. RD policy should address this problem by supporting the continued production of these public benefits and ensuring sustainable development on environmental, economic and social levels.

Part 2: Setting the Objectives

The strategic policy goal for EU's rural development is proposed to be: *'to accompany and complement CAP market policies in the overall aim of supporting the sustainable development of all rural areas throughout the enlarged EU'*. BirdLife International recommends that this policy goal is strengthened and made independent from the CAP market policies, given the overall policy shift of the last CAP reform and the ongoing World Trade Organisation negotiations towards free market-led agriculture systems. We recommend that the strategic policy goal of RD should be explicitly *to support environmental conservation and socio-economic development in all rural areas throughout the enlarged EU*. In the longer term, the RD policies need to evolve to become the primary mechanism for supporting sustainable land management and rural communities, as Pillar I subsidies become less linked to production systems.

Part 3: Achieving the Objectives

BirdLife International welcomes the principle of taking a strategic overview of European RD programmes, and setting out options to explore the most appropriate way forward. We are concerned, however, that the options presented do not link clearly to the objectives and

priorities set out in Part 2. The options should consider the need to achieve each individual objective, and reflect the broader context of the recent reforms of the Common Agriculture Policy, including the important principles of decoupling and cross-compliance. It is unclear how the options as set out will become the primary mechanism for delivering sustainable land management and rural communities across Europe. In particular, the key role of agri-environment schemes at the heart of RD policy should be recognised and extended.

The emphasis in the document and in public statements from the Commission is very much on Option 2. BirdLife International is concerned that major strategic decisions appear to be being made in advance of full consultation and in the absence of a detailed impact assessment. We note that the document does not contain an analysis of what the impact of adopting any of the options would be on the current portfolio of RD programmes, at either European or Member State level, and recommend that this is carried out as a matter of priority.

A very important omission is an analysis of funding requirements to meet European Rural Development objectives. Many of the restrictions proposed later in the document arise from inadequate funding allocated to RD and agri-environment. This should be recognised explicitly and an objective should be set for switching more funds from Pillar I to Pillar II in the medium term, as well as rationalising CAP, LEADER Initiatives and Structural Funds.

Option 1

This option retains important principles such as the use of Good Farming Practice and compulsory agri-environment schemes. BirdLife International believes that more progress could still be made towards a comprehensive rural policy as set out in our vision above and in Annex 1.

The paper proposes that for all options, Commission co-financing rates will be reduced from those agreed under CAP reform in 2003, from 85% to 75% in Objective 1 areas and from 60% to 50% in all other areas. BirdLife International queries how this has come about and recommends against this proposal. Rural development schemes should not be financially unappealing to Member States, and decisions by the Agriculture Council should not be overturned in a matter of months by Commission officials.

Option 1 proposes a limited role for LFAs, focused on areas in danger of abandonment. This oversimplifies the issue and does not clarify the role of LFAs in a post-decoupling world. BirdLife International recommends that LFA designations are reviewed and re-established according to environmental and social objectives, thereby reinforcing the viability of marginal and high nature value farming systems at risk.

Option 2

BirdLife International welcomes the intention to take a more strategic approach to RD schemes and to provide clear objectives and a well-defined strategy. However, we have a number of serious concerns about the details of this option. It is unclear from the document exactly what is meant by some parts of the text, and we feel that this leaves the

Commission open to accusations of formulating new policy recommendations that are not made clear to stakeholders.

Option 2 fails to state that agri-environment schemes will continue to be compulsory for all Member States. This is a vital element of RD policy and must be rectified immediately. Without mandatory Europe-wide agri-environment programmes there will be no mechanism for meeting Europe's environmental targets or of supporting the new generation of sustainable farming. Reducing agri-environment to an optional measure for Member States would be a massively retrograde step and would render meaningless many of the great agriculture policy gains of the last decade. BirdLife International recommends that agri-environment schemes are compulsory and placed at the heart of all Member State RD programmes.

Option 2 proposes a targeting system for agri-environment schemes based around measures for areas with natural handicaps and Natura 2000 areas, and broader measures available outside these zones. BirdLife International recommends against restricting the application of agri-environment schemes. Commission intervention should not make the schemes too inflexible to be tailored to national and regional conservation priorities, or restrict the areas of application or the types of farming they should support. In particular we are disappointed that biodiversity issues are not mentioned here, since the implementation report for the Biodiversity Action Plan recognises the central role of agri-environment schemes in halting biodiversity declines by 2010. High nature value farming systems and landscape features which are not inside Natura 2000 sites must receive continued and increased protection, and agri-environment schemes must address the decline of once common and widespread farmland wildlife. Environmental protection measures such as measures against soil erosion and water pollution should be delivered through environmental legislation and cross-compliance. The Commission should encourage Member States to develop outcome-led agri-environment schemes which offer support for all land managers for environmentally sensitive practices and specialist measures for high priority sites and issues.

Further, option 2 states that agri-environment payments should continue to be based on costs incurred plus income foregone. BirdLife International recommends that the Commission commits to reviewing this payment system with the intention of developing a new mechanism which recognises the value of the environmental services provided. Without an improved payment system, agri-environment payments will never become the primary mechanism for supporting sustainable land management, and there will always be an artificial dependence on Pillar I subsidies for income support to land managers.

We are concerned at the proposal to abolish Good Farming Practice and adopt cross-compliance as the baseline standard for agri-environment and LFAs. This would be a clear step backwards, especially since cross-compliance is likely to deliver little more than legal minima. This would represent poorer value for public money, because agri-environment funds would further stretched as they would need to pay for the practices that are currently delivered free through GFP. BirdLife International recommends harmonising GFP and cross-compliance by applying the GFP standards more widely, and does not support

abolishing GFP as this would undermine the basis for many Pillar II schemes across Europe.

The proposals for financial management and control seem unnecessarily restrictive. In particular, the rule that 20% of funding must be allocated to each Axis will unfairly penalise agri-environment in Member States who spend more than 60% of their RD funds on such schemes. Moreover Axis 2 “land management/environment” does not include only agri-environment measures and article 16, but also measures that could compete with them such as LFAs and forestry which do not have any environmental objectives. BirdLife International recommends a full economic analysis of this proposal and suggests that without a major increase in RD funds, agri-environment expenditure should not be limited.

Option 2 does not set out specific proposals for LFAs, although reference is made to areas with natural handicaps objectively defined by altitude and slope. Again, this does not clarify the role of LFAs in a future RD strategy. Altitude and slope are not the only objective criteria for natural handicaps. BirdLife International recommends that the proposals for LFAs are more clearly explained and that designations are reviewed according to environmental and social objectives.

Option 3

We have no specific comment on Option 3 as it is not fully explained in the EIA document.

BirdLife's Rural Development's Policy

BirdLife International's vision is for a thriving rural community in Europe, which lives and works sustainably in a healthy countryside, conserving traditional European landscapes, producing healthy and safe food and maintaining an abundant and diverse range of habitats and wildlife.

A single, simplified funding mechanism, supporting *all rural activities*, including farming, should replace the current financial division between agricultural and rural development. Plans to review the current Rural Development Regulation (RDR) represent a timely opportunity to re-establish links between public support and the delivery of public benefits with the view to building a future single framework in support of the wider countryside, and for outcomes such as a healthy environment rich in wildlife, that can justify continuous and generous public support.

BirdLife International's Six Step Plan for reforming Rural Development Policy in Europe

1. BUILD A STRONG PILLAR II

- In the short term, progressively and rapidly cut funds to Pillar I and transfer them to Pillar II through a process of modulation.
- Improve specific provisions in the rural development budget for 2007-2013 to afford sufficient funds for management of the NATURA 2000 network and other important sites to meet EU biodiversity commitments.
- Provision of all Pillar I and Pillar II support should be conditional on respecting a common baseline of environmental protection.
- In the long term, there should not be any distinction between agricultural and rural development support, but a single, consolidated programming and funding instrument.

2. PROVIDE INCREASED FUNDING AND RE-DESIGN AGRI-ENVIRONMENT SCHEMES

- Review the design of agri-environment schemes according to outcome objectives, performance criteria and biodiversity requirements.
- Introduce more financially rewarding schemes, encouraging a shift away from schemes based on income foregone to those providing added value and environmental benefits.

- Agri-environment schemes should include simple, inexpensive measures available to all farmers to deliver widespread and measurable environmental benefits, and targeted specialist measures available to all land managers to protect and enhance biodiversity and priority sites.

3. RE-DESIGN THE ‘LESS FAVOURED AREAS’ SCHEME

- Review and re-establish LFA designations according to environmental objectives and targets, thereby reinforcing the viability of more marginal and high nature value (HNV) farming systems at risk.
- Develop appropriate and verifiable standard indicators to monitor and assess the contribution that LFAs make to meeting environmental and social objectives.

4. MANDATE ENVIRONMENTAL IMPACT ASSESSMENT PRIOR TO AFFORESTATION OF MARGINAL LAND TO PROTECT HIGH NATURE VALUE AREAS

- Prior to permission being granted, any proposed afforestation of agricultural or non-agricultural land should be subject to mandatory ecological planning or an environment impact assessment.
- Prevent afforestation of any marginal high nature value land, which could contribute to meeting EU biodiversity commitments.
- In cases where afforestation is permitted on the grounds that it will not impact negatively on biodiversity, the planting of non-indigenous species should be prohibited.

5. MANDATE THE APPLICATION OF ARTICLE 16 AND PROVIDE ADEQUATE FINANCIAL RESOURCES TO SECURE THE LONG-TERM PROTECTION AND MANAGEMENT OF THE NATURA 2000 NETWORK

- Re-define the requirements and mandate the application of Article 16 by Member States, so that farmers and other relevant land managers enter NATURA 2000 management agreements.
- Ensure that sufficient funds are made available to ensure the effective management of NATURA 2000 sites across all EU-25 Member States.

6. ENSURE TARGETED ACTIONS TO PROTECT THE COUNTRYSIDE AND BIODIVERSITY IN CENTRAL AND EASTERN EUROPE

- Require new Member States to have appropriate measures in place to protect and conserve areas of high nature value and associated traditional farming practices.

- Dedicate sufficient funds specifically to upgrading farming advisory infrastructures, including environmental education and training for advisors and farmers.
- Require mandatory ecological planning or EIA prior to afforestation of agricultural land or any other economic activity as a result of diversification under RDPs or agricultural intensification.



9 June 2004

EEB Comments on the Extended Impact Assessment for Rural Development Policy post 2006

The EEB welcomes the exercise of conducting an “extended impact assessment” on Rural Development Policy post 2006 and the opportunity to comment on it. However, the EEB is concerned about important shortcomings of the assessment and alarmed by some of the options spelt out in the paper.

Moreover, the EEB objects to the way the Commission is managing the consultation on the impact assessment document. It was circulated one week prior to the meeting of the advisory group on rural development on 25 May where stakeholders were asked to comment within two weeks. On the 11th December 2002, the Commission published its *"General principles and minimum standards for consultation of interested parties by the Commission"*. The Communication itself singles out issues going through an extended impact assessments as the ones where the principles and standards should apply. The Communication says that *"the Commission should strive to allow at least 8 weeks for reception of responses to written public consultations..."*. The EEB would also like to point out that a similar weakness occurred during the consultation on the impact assessment on the reform of the Sugar Regime a year ago.

Therefore, the EEB would like to call upon DG Agriculture to:

- from now on respect the timeframes for consultation as required by the Communication of 11/12/02.
- in this procedure respect the standards laid down by the above Communication in relation to the publication of input received from stakeholders on the internet and adequate feedback on the responses.

The EEB’s comments build upon three earlier submissions: the EEB position paper on the future of rural development policy submitted to DG Agriculture on 28 May; the EEB comments to the questionnaire of DG Agriculture presented to the ad hoc working group on rural development of 25 May; and the enclosed letter to Commissioner Fischler.

1. GENERAL REMARKS ON THE PROCESS

The EEB sees the Commission's 'Extended Impact Assessment on Rural Development Policy post 2006' as a welcome step towards a full impact assessment. At present, however, it lacks proper analysis of the possible effects of the options proposed. Also the options outlined are not elaborated sufficiently and lack detail. Many elements of option 2 need further analysis.

The status of the paper "Extended Impact Assessment for Rural Development Policy post 2006" is not entirely clear. We hope that it will be a starting point for a continued discussion open for stakeholders.

2. GENERAL REMARKS

2.1. Setting the objectives

The EEB considers rural development (RD) to be part of the larger issue of sustainable development. There are economic, environmental and social – as well as a global solidarity - dimensions to sustainability and they are all of equal importance. Accordingly the EEB promotes a distinct RD policy. The proposed strategic objective is to "*accompany and complement CAP market policies in the overall aim of supporting the sustainable development of rural areas throughout the enlarged EU*" does not fulfil this goal. RD can not be regarded as the tool aimed at compensating negative effects of the CAP market policies. In the long term perspective RD must be the core of the CAP.

2.2. Better integration with other policy tools

Rural development policy alone cannot achieve sustainable development of rural areas. EU policies which are effective in the same region, e.g. Structural and Cohesion Funds, as well as other national and regional policies must have synergies and be coherent with RD policy. The impact assessment fails to adequately spell out how the different policy tools can best complement each other.

2.3. Environmental integration

As stated in our position paper the EEB would like to stress once more the importance to integrate environmental criteria across all rural development measures.

2.4. Public participation

A bottom up approach to drawing up, implementing and evaluating RD programmes is essential. Without a clear and well targeted stakeholder consultation and long term involvement in rural development very few results will be achieved. It must be up to the Member States to decide on appropriate procedures to achieve an active public participation.

3. PART 3: ACHIEVING THE OBJECTIVES

The emphasis given to option 2 implies that it will be most likely to influence the shape of the imminent legal proposals for the Rural Development Regulation. The EEB would like to stress that more extensive analysis and stakeholder consultation is needed before such major strategic decisions can be taken.

The EEB welcomes a more strategic approach and an emphasis on improved monitoring and evaluation of environmental outcomes. Many elements of option 2, however, give rise to concern:

Option 2 does not mention that agri-environmental measures (AE) will continue to be compulsory for all Member States. The EEB stresses that AE must remain compulsory and be offered to farmers and other land managers all over the territory. This is especially important in many of the new MS which otherwise might opt for non-implementation of AEs.

Option 2 also proposes to restrict AE to a geographically limited number of target areas.

This would eliminate many useful schemes, e.g. maintain HNV farming systems, including organic farming, and specific landscape features which are outside the geographically restricted areas. Instead the EEB stresses that AE must be available across the EU territory, best suited to specific conditions of specific areas. A 'pyramid approach' (see EEB position paper) would allow to target AE more effectively. Simple 'entry level' schemes (which go beyond GFP) should be available to all farmers land managers (also in more intensive areas), with more specific measures targeting areas or habitats of particular relevance for the environment and / or biodiversity as one moves up the pyramid.

AE should be promoted by favourable co-financing rates. The proposal included in all three options to reduce the co-financing rates for AE agreed by the Agriculture Council less than one year ago is unacceptable.

Option 2 foresees an obligation to devote at least 20% of RD funding to each of the three axes of competitiveness, land management and wider rural development. The EEB opposes this proposal. Without a major increase in Pillar II funds this requirement would force Member States who have allocated more than 60% of their Rural Development budget to the land management axis (e.g. the UK, Austria, Finland, Ireland and the Czech Republic) to cut their spending in these areas.

Option 2 proposes to remove Good Farming Practice as the minimum requirement for agri-environment and Less Favoured Area payments and replace it with cross-compliance. The EEB proposes instead that GFP should be set as the single baseline for both pillar 1 and RD payments, going beyond statutory requirements. The Commission should define a strong EU framework for the definition of GFP which Member States adapt to regional conditions (subject to the approval by the Commission).

The designation criteria for LFAs proposed both in option 1 and 2 need to be more thought through. Option 1 implies to restrict LFAs to areas “in danger of abandonment”. This would cause problems e.g. in more mountainous areas not facing abandonment. Option two refers to mountains and hills “objectively defined by altitude and slope” and Natura 2000 areas. This could eliminate areas at lower altitude with handicaps comparable to those faced by mountainous areas as well as High Nature Value farmland outside Natura 2000 areas.

The EEB suggests that criteria for LFA designation should be reviewed according to environmental and social objectives and targets and that LFAs should be more effectively targeted at HNV areas.

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The future of rural development policy

The European Environmental Bureau (EEB)

The EEB is a federation of 142 environmental citizens' organisations based in all EU Member States and most Accession Countries, as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The aim of the EEB is to protect and improve the environment of Europe and to enable the citizens of Europe to play their part in achieving that goal.

The EEB office in Brussels was established in 1974 to provide a focal point for its Members to monitor and respond to the emerging EU environmental policy. It has an information service, runs working groups of EEB Members, produces position papers on topics that are, or should be, on the EU agenda, and it represents the Membership in discussions with the Commission, the European Parliament and the Council. It closely coordinates EU-oriented activities with its Members at the national levels, and also closely follows the EU enlargement process and some pan-European issues.

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The future of rural development policy

1. EXECUTIVE SUMMARY

1.1 Vision

The EEB considers rural development (RD) to be part of the larger issue of sustainable development. There is an economic, environmental and social – as well as a global solidarity - dimension to sustainability and they are all of equal importance. Sustainable rural development must contribute to achieving EU environmental policy priorities (such as climate change commitments, the 2010 biodiversity target, the Natura 2000 network, soil protection etc).

1.2 Context for a better rural development

Rural development is dependent on the whole society building towards sustainability. Sustainable economic development cannot be based on a deserted countryside and will not succeed without sustainable management of natural resources.

RD Policy alone cannot make rural areas sustainable. Policies which are effective in the same region, eg the structural funds and other EU sectoral policies as well national and regional policies must follow sustainability principles and have synergies with RD policy. It will be difficult to ensure sustainable agricultural production as long as external costs, like environmental damage, are not internalised in the costs of production. The legislation for environment and animal welfare must be stricter and fully implemented.

Pillar one of the CAP should complement RD policy and not hamper it. The WTO must not limit the possibilities to create agricultural policies that support food sovereignty, food security, and ecologically sustainable agricultural systems.

The development of rural areas in the new Member States (MS) deserves special attention because the risk of losing natural assets is extremely high. Adequate measures are needed to protect the outstanding natural richness and avoid land abandonment. Urgent needs are capacity building (incl. at administrative level), farm advisory systems, strengthening civil society and the involvement of local actors. The creation of alternative sources of income in rural areas alongside agriculture is vital.

1.3. Required changes for RD policy

- More funding.

The tightly constrained budget for the second pillar is thwarting its true potential (eg contributing adequately to EU environmental policy objectives). RD has to be strengthened more substantially, via increased modulation and budgeted for in the new Financial Perspectives. RD should become the core of the CAP.

- Broader focus.

The actions to achieve the RD objectives should be performed by the actors best suited to do so. RD funding should therefore be made equally accessible to non-farmers, eg other land managers (like Natura 2000 site managers), NGOs and the broader rural community. While agriculture still plays an important role in rural areas, policy towards rural areas needs to be more broadly based than agriculture.

- More participation.

More public participation in the process of RD Plans at national and regional level is needed and consultation should be made mandatory. Local, regional and national authorities must treat rural communities and NGOs as full partners in RD programmes. The EEB would like to see the essential elements and positive experiences made with the LEADER Community initiative mainstreamed in RD policy.

- More diversity and flexibility with more target oriented control.

All MS should be encouraged to use the existing flexibility provided by the Regulation for adaptation to local needs. The Commission must be able to challenge the combination of measures of MS if environmental and social objectives are not adequately addressed.

- Better environmental integration.

Environmental criteria must be integrated across all RD measures. Targets of EU environmental policy must be clear at national and regional level, must be monitored with meaningful indicators, properly evaluated and sufficiently controlled. Relevant stakeholders other than farmers (eg Natura 2000 site managers and NGOs) should have access to funding.

- A more integrated approach.

In many cases, the RD plans are a collection of existing measures rather than a coherent set of actions tailored at the needs of a specific region. The Commission should ensure that RD programmes are based on a sound analysis of the environmental, social and economic needs, and that MS appropriately tailor RD programmes to these.

- Simplification.

The proposed single fund for RD has potential for simplifying administration by bringing together the EAGGF guarantee and guidance section.

- Control.

MS should be made more accountable. They should be required to indicate clearly in their RD plans how they plan to achieve a limited number of strategic objectives based on proper analysis of the needs of different regions, subject to approval by the Commission.

More specifically, for the coming Mid Term Review of the Rural Development Regulation, the EEB recommends the following:

- earmarking at least 50 % for nature and environmentally friendly land use, making the application of article 16 mandatory in RD programmes. This is necessary since some MS have proven to give insufficient priority to environmental issues
- the level of Good Farming Practice (GFP) should be set as the single baseline condition for all agricultural and RD payments and should go beyond statutory requirements. The Commission should define a strong EU framework for the definition of GFP.
- agri-environmental measures are important and can be more effective:
 - payments ideally based on public benefit instead of income foregone
 - option to participate in certain schemes for more than five years
 - groups of farmers and civilians cooperating should be eligible for payments
 - the Commission should develop a set of meaningful indicators to monitor the environmental performance of agri-environmental schemes
 - a pyramid approach to better target agri-environmental schemes, offering increased funding for measures with more active management
 - obligation for MS to include biodiversity schemes.
- Harmonised support for organic farming:
 - requirement for both support for conversion to and maintenance of organic farming to be provided in the RD programmes.
- Less Favoured Areas (LFAs) need environmental criteria:
 - the LFA approach should be maintained but more effectively targeted at high nature value areas
 - review designation criteria of LFAs and change title ‘LFAs’ to ‘Environmental Areas at Risk’ (EAR)
- Environmental Impact Assessment (EIA) for investments in agricultural holdings:
 - an EIA should be required in order to avoid investments in environmentally damaging enterprises
 - investments should stimulate environmental friendly production processes like renewable energy (as long as environmental friendly forms are used).
- Conditions for supporting afforestation:

- the EEB is not in favour of supporting afforestation, except in case of conservation purposes and investment in sustainable forest management
 - an EIA should be mandatory prior to afforestation and the extent of afforestation should be limited to a certain percentage
 - support both for private and public forest owners.
- New MS:
 - continue measures such as LEADER+, farm advisory and extension services, compliance with Community standards and producer groups after 2006
 - strengthen administrative capacity
 - farm advisory systems to focus on cross-compliance and environmentally sensitive management practices and involve NGOs as partners
 - stimulate producer groups esp. for organic farmers.

2. EEB POSITION PAPER

2.1 Introduction

The current review of EU's RD policy provides an opportunity to create a long-term vision for a thriving and sustainable countryside.

It provides an opportunity to move away from a sectorally based and farmer-focused policy with a 'compensation' ethos to one which is more integrated and territorially based. Towards a policy which provides the right incentives and adequate remuneration for improving the environmental situation and enhancing biodiversity by paying farmers and other land managers for the external benefits they provide to society and which the market does not pay for.

The new EU budget for 2007-13 will determine the resources available for RD. The EEB believes that the RD budget must be considerably increased and sustainable RD spending must become the core of the CAP.

This paper describes the EEB's vision for sustainable RD and provides recommendations for necessary changes in RD policy, in particular for the revision of the RD regulation.

2.2 Vision

A living countryside is in the interest of society as a whole. Thriving rural areas benefit all Europeans and contribute to cohesion and competitiveness of the EU.

The EEB considers RD to be part of the larger issue of sustainable development. There is an economic, an environmental and a social dimension to sustainability, as well as global solidarity, and they are all of equal importance. RD is dependent on the whole society building towards sustainability. Sustainable economic development cannot be based on a deserted countryside and will not succeed without sustainable management of natural resources.

Sustainable RD:

- provides high quality food (the term high quality should encompass environmental and animal welfare aspects as well as safety and health issues), raw materials and resources, including renewable energy
- preserves and develops the rural landscapes with their high nature and culture values
- improves the environmental situation
- protects habitats and biodiversity
- allows diverse rural communities to thrive, where quality oriented agriculture has a key role
- diversifies rural economies (eg tourism, recreation, etc.)
- reinforces local identities, respecting cultural diversity
- creates good living conditions for the rural communities.

The rural areas consist in reality of a number of different types of areas: forests, agricultural land, smaller communities and its infrastructure, etc. All these biotopes are interlinked and interact with one another. Sustainable RD takes this into account and recognises the equal importance of all areas. It promotes the production of high quality food and raw materials, and the potential to give them added value, through on site processing. It preserves and develops rich, diverse rural landscapes with all its different biotopes for wild and domestic plants and animals.

The agricultural landscape is an essential part of the rural areas. With its pattern of arable land, pastures and landscape elements such as hedges, ditches, ponds, etc, it holds great values for man and nature. Farming has created much of what society values in Europe's rural areas. The agricultural landscape is of major importance for biodiversity, cultural heritage, recreation and tourism. Sustainable RD must favour agricultural production systems, which facilitate the preservation and development of these assets all over Europe. Active farmers are necessary to achieve the goals of sustainable development.

However, at present, the environmental situation is deteriorating in many rural areas. Sustainable RD must contribute to achieving EU environmental policy priorities such as the management of the Natura 2000 network of protected areas, which will be key to

achieve EU's target of halting the loss of biodiversity by 2010. Other important objectives include soil protection and the target of the Water Framework Directive to achieve good ecological and chemical status of European waters by 2015. RD should also contribute to the EU's climate change commitments under the Kyoto Protocol by increasing the use of renewable energy. Article 6 of the EC Treaty states that environmental considerations have to be integrated in the EU's sectoral policies. The objectives of the Sustainable Development Strategy must be placed at the heart of the EU's RD policy as required by Article 2 of the Treaty and as stressed in the conclusions of the Gothenburg European Council in 2001.

Sustainable RD must respect the specific needs of the greatly diverse rural areas across Europe and allow rural communities to thrive and blossom. In an era of globalisation, the survival of the diversity of local cultures may play a key role for the quality of our society. Local business, which utilises local resources, is the backbone of thriving communities. Among the local businesses, the agricultural sector is of special importance, as it focuses on quality aspects and strengthens other parts of the rural economy (processing, direct marketing, tourism etc).

Good living conditions for the inhabitants of the rural areas are a key factor for sustainability. The same possibilities as in the urban parts to fulfil basic needs such as health care, education, etc must be given to the rural areas. Living in a rural area has unique qualities, eg closeness to nature. Sustainable development recognises these assets and improves them. The presence of locally active people is often a key factor for achieving many of the environmental goals while other RD goals may be threatened by strong pressure from the urban areas.

3. CONTEXT FOR A BETTER RURAL DEVELOPMENT

Sustainable rural development cannot be achieved by RD policy alone and, better integration with other European and national policies which have an effect on rural areas is needed. The Structural and Cohesion Funds and the first pillar of the Common Agricultural Policy (CAP) in particular have a major impact on rural areas.

3.1 Internalising external costs remains key objective

The effects of environmental damage, animal suffering or social injustice are not taken into account in the pricing of products and services. In the short term a product can be produced more cheaply by abusing the environment. These non-covered or external costs are covered by society as a whole via the costs of eg water purification, loss of health and loss of biodiversity. Any move to a more liberalised trade should be accompanied by internalisation.

The EEB thinks that the EU should move forward more rapidly and actively on internalising the external costs of agriculture. Steps forward are a harmonised levy on pesticides and on nitrogen. The Treaty still requires unanimity in the Council of Ministers

concerning tax harmonisation. The EEB has repeatedly argued for changing the Treaty in this respect.

3.2 More emphasis on implementation of legislation still required

The EEB would like to see stricter laws on animal fodder, animal welfare and environment as well as stricter and faster implementation of them at national level. The EEB encourages the Commission to pursue legal procedures pushing the Member States to fully implement the directives. The latter is of utmost importance since many pieces of EU legislation are not sufficiently implemented (for example the Habitat Directive).

3.3 Paying for public benefits with the CAP

The current trend in agriculture will unfortunately continue: some farmers will focus entirely on intensive production, others focus on other functions in addition to agricultural production, such as environmental services, tourism, local services, handicrafts, etc. The EEB is not in favour of such a segregated development of farming but rather aims at farming systems integrating production and other benefits such as environmental ones. The EEB believes that in principle the first group should not be entitled to public support. Given the special character of agricultural production and markets, the EEB recommends using forms like insurance schemes and income stabilisation funds to avoid extreme income instability. The second group, the multifunctional farms, supply public goods for which there is no reward in the market. Therefore these farmers should receive public payments for the services rendered. This means that price and other support directly related to agricultural production are to be phased out, the remaining funds are to be shifted to RD.

The Mid Term Review 2003 offers possibilities for MS to redirect part of the direct payments to sustainable agriculture by using national options like national envelopes and higher rates of (voluntary) modulation. The EEB recommends MS to make use of these options to complement RD measures. MS should also opt for a regional implementation of the Single Farm Payment (SFP) and redistribution of payments instead of income payments based on historic yields in order not to fossilise the current system which favours the most intensive farmers.

3.4 Nature and environment in new EU Member States require extra attention

Compared to the EU-15, agriculture in most new Member States is more labour-intensive and less mechanised, uses less pesticides and fertilisers (due to economic restructuring and lack of capital in the early 1990s) and supports a greater biodiversity.

The special needs as well as the natural assets (thriving nature, diversity of landscapes) which the new MS have brought to the EU, should be recognised and adequately supported. There are some specific needs which require special attention, such as capacity building, farm advisory systems, strengthening civil society and the involvement of local actors, etc. Land abandonment on the one hand and intensification on the other hand are major threats in the new MS. Appropriate measures need to be put in place to avoid land

abandonment especially where biodiversity depends on the continuation of extensive and more traditional farming.

The new MS will initially only receive 25% of direct payments compared to the EU –15 and will reach the same level in 2013. A special concern is that in the first years of CAP implementation the new MS can, under certain constraints, divert up to 20% of their RD funds to pillar 1. Many of the new MS are likely to make use of this option to 'top up' direct payments with the consequence that these resources will be missing for much needed RD. The consequences of such policy would be detrimental for rural areas in the longer term.

3.5 Cohesion Policy must contribute to sustainable development

Growing unemployment and disparities between rich and poor regions are an important challenge for the enlarged EU. Structural and Cohesion Funds, the EU's instrument for cohesion and solidarity with economically less developed regions of the EU, have helped to modernise and transform the economy of many rural areas. Spent wisely cohesion policy can contribute to sustainable development and result in large benefits for the environment. However, there is a danger that Structural and Cohesion Funds are used for outdated models of economic development, disregarding nature and people's needs.

The new regulations for the next programming period of the funds must help to achieve the objectives of the EU's Sustainable Development Strategy. The EEB demands that structural and cohesion funds must fully comply with EU environmental legislation and that the Commission should withhold funds where projects are likely to damage the environment.

3.6 Time is ripe for environmental integration on global level and Fair Trade

The WTO has had a great impact on the development of agricultural policies of the MS. In particular it has limited the possibilities to create agricultural policies that support food security and ecological sustainable agricultural systems, because of pressure for decreasing the prices of agricultural products and governmental support for this sector. The EU must phase out export subsidies and encourage others to do the same.

The EEB believes there is an urgent need to assess and review the impact of WTO regulations on sustainability and environment, as well as on other aspects of development and equity in the world. The assessment should lead to necessary reforms of the agreements, before any new issues are introduced on the WTO agenda. Regarding agriculture, in particular, the agriculture agreement in relation to global food security and ecological sustainability, has to be revised, without expecting Third World Countries to pay anything under the form of new unwanted issues placed in the agenda in return for those changes.

The need of food sovereignty, food security and sustainable agricultural production should be the overall aim of all agricultural trade policies. National flexibility in the course of pursuing food sovereignty and food security, rural livelihood and environmental goals is necessary.

4. REQUIRED CHANGES FOR RURAL DEVELOPMENT POLICY

An effective RD policy at EU level will require significant changes and appropriate levels of funding. This chapter explores the main changes that are needed for RD policy to develop its full potential.

4.1 More funding

The tightly constrained budget for the second pillar is thwarting its true potential. The RD budget 2004 amounts to about 10% of the total CAP budget (€4.5 billion), whereas the remaining 90% is still spent on direct payments and market measures. Only a slight increase was decided in the Mid Term Review reform 2003, which will make an extra €1.2 billion available for the RD budget by 2013 through modulation. RD has to be strengthened more substantially if the full potential of the second pillar is to be realised. The EEB believes that a greater parity in funding of the currently unequal pillars is needed and that sustainable RD has to become the core of the CAP in the long run. The CAP budget has to be re-coupled to the provision of 'public benefits'.

4.2 A broader focus

The activities to achieve the RD objectives should be performed by those actors best suited to do so. Therefore, RD funding should be made equally accessible to non-farmers, eg other land managers (like Natura 2000 site managers), NGOs and the broader rural community. While agriculture still plays an important role in rural areas, policy towards rural areas needs to be more broadly based than agriculture.

Also, the full range of measures available under the RDR need to be used more effectively to meet the broad set of objectives of the RDR. Member States should incorporate strong targets and indicators of sustainable RD, much more so than they do currently, balancing economic, social and environmental outcomes.

4.3 More participation

Public participation in the design, implementation and monitoring of policies is vital to achieve a successful sustainable RD package which recognises the needs of local people and the local environment. Local, regional and national authorities must treat rural communities and NGOs as full partners in RD programmes. Consultation should be made mandatory. The EEB would like to see the essential elements and positive experiences made with the LEADER Community initiative mainstreamed in RD policy. These are, for example, an integrated and territorial bottom-up approach, public participation, local partnership (between public, private and voluntary sectors), community-led and innovative projects owned by local actors, multi-stakeholder, promoting sustainable development.

4.4 More diversity and flexibility with more target-oriented control

All MS should be encouraged to use the existing flexibility in the Regulation for local adaptation. A territorial approach should be adopted, i.e. sub-regional actors should have the possibility to manage RD. It must be emphasised, however, that more flexibility means

that MS have more responsibility for using the right combination of measures, which meet local needs and target the local environmental, economic and social priorities. The Commission must be able to challenge the set of measures chosen by MS if environmental and social objectives are not adequately addressed.

4.5 Better environmental integration

RD has the potential to make an important contribution to EU environmental policy priorities. The EEB stresses that it is not enough to tackle environmental objectives with 'environmental' RD measures only but that it is imperative that environmental criteria are integrated across all measures. A more integrated approach to planning, including environment planning, is the only way to achieve real sustainable RD. The targets of EU environmental policies must be clear at national and regional level. They must be monitored with meaningful indicators, properly evaluated and sufficiently controlled.

4.6 A more integrated approach

In many cases, the RD plans are a collection of existing measures, rather than a coherent set of actions tailored at the needs of a specific region. The Commission should ensure that RD programmes are based on a sound analysis of the environmental, social and economic needs and that MS appropriately tailor RD programmes to these. Strategic Environmental Assessment for RD programmes and plans should be required.

Furthermore, there is need for better coordination with other policies and plans which are effective in the same region (EU-funded, national and regional). Regarding the relationship between cohesion policy and RD, there needs to be clarity on how the spending (eg for certain investments or training in rural areas) under the different funds can best complement each other and which measure can be best covered by which fund. This should be indicated in the RD Plans.

4.7 Simplification

Simplification is desired by all and is a necessary part of future development of RD programmes. The EEB recognises the potential for simplification offered by the proposal of a Single Fund for Rural Development. But the Fund should be flexible and adaptable enough to meet all the very diverse regional and local needs.

4.8 Control

Flexibility means responsibility, so MS should be made more accountable. They should be required to indicate clearly in their RD plans how they plan to achieve a limited number of strategic objectives based on proper analysis of the needs of different regions. These strategic objectives must include the environmental priorities of the regions.

Often the environmental issues are not adequately assessed in RD plans and only general environmental objectives are set which do not necessarily relate to the identified environmental priorities. Therefore the Commission should control in particular if MS analyse and address environmental issues properly.

5. INTERMEDIATE STEP – RECOMMENDATIONS FOR THE 2004 REVIEW OF THE RURAL DEVELOPMENT REGULATION

With the vision, context and required changes in mind this chapter contains recommendations for the 2004 review of the Rural Development Regulation. It will address horizontal issues as well as different RD measures.

5.1 Earmarking at least 50% for nature conservation and environmentally friendly land use

Some Member States have tended to focus more on competitiveness and have given little or no attention to environmental issues. Previous records of new Member States with SAPARD programmes also show this tendency. At the same time these countries still had severe environmental issues that were not sufficiently addressed. Therefore at least 50% of rural development funds should be earmarked for environmentally-friendly land use and nature conservation, including organic farming and funding for the management of Natura 2000 sites, with the application of Article 16 made mandatory as part of national RDPs. Earmarking will be especially important for some new Member States where (given the experiences with SAPARD) environmental issues have little priority.

The Natura 2000 network, however, also requires co-financing from the proposed Financial Instrument for the Environment as well as from the Structural Funds. The new Structural Funds regulations should legally require the funds to contribute to the management of the Natura 2000 Network.

5.2 An EU framework for Good Farming Practice

The level of Good Farming Practice (GFP) should be set as the single baseline condition for receiving both direct payments and Pillar 2 support and it should go beyond statutory requirements. The current definition of GFP varies greatly amongst MS and has been defined in a biased way according to agronomic considerations. For GFP to better reflect the concerns of society and to reduce the disparities between MS, the Commission should define a strong EU framework for the definition of GFP, which should reflect all environmental objectives, as well as animal welfare and cultural objectives. MS should then develop detailed criteria adapted to regional conditions (climatic and other), subject to approval by the Commission. Such procedure would also ensure a more homogeneous entry level for CAP payments in the different MS and be less confusing for farmers. Some of the key elements the framework should include are basic requirements in terms of fertiliser and pesticide use, maintenance of landscape elements, rules on crop rotation, soil protection, grassland management, water management and animal husbandry.

5.3 Agri-environmental measures are important and can be made more effective

Agri-environmental measures should be payments for the added value beyond Good Farming Practice (GFP). The payments are to be based on the environmental services provided, such as restoring habitats. Since the payments are based on the added value, they should not be based on income foregone, but on the benefit for society. As mentioned in the previous chapter, stakeholders other than farmers should be able to access these funds.

This can also be a group of farmers and civilians who cooperate together to achieve a certain target, such as restoring a habitat. Such groupings should be eligible for payments as well.

Another practical issue is the period of funding. The funding is currently guaranteed for 5 years. Options should exist for participating in ‘dark green’ measures (eg management of temporary wetlands, habitat restoration) qualifying for funding for up to 20 years, to provide financial security to those who sign up for these measures and ensure continuity. This would also enable agri-environmental schemes to ‘compete’ with afforestation measures (20 years funding), especially where the latter would negatively affect biodiversity.

Proper monitoring will also make the agri-environmental schemes more effective in future. The Commission should develop a set of clear and meaningful indicators, harmonised and targeted to monitor the goals of the environmental performance of agri-environment schemes. The indicators should closely match the environmental aims set out in the RDP proposal.

The effect of agri-environmental measures can be further improved by targeting environmentally sensitive areas. A pyramid approach should be devised to ensure that the measures are targeted at the most sensitive areas. The base of the pyramid would correspond to minimum standards set by GFP. Any measure that goes beyond this baseline would qualify for funding. There would be a simple ‘entry’ level available to all with more targeted or specific measures as one moves up the pyramid, i.e. maintain>restore>protect and create habitats as the changing objectives. The more ambitious and environmentally valuable these measures are, and the more active the management is, the more funding would become necessary. These measures directed at maintaining habitats are especially important in the new MS and accession countries because of the high nature value of many habitats managed by farmers using traditional methods. This way more support would be granted to those areas where more intervention is needed or which are more fragile and therefore require very sensitive management to yield positive environmental outcomes.

5.4 Agri-environmental measures must target biodiversity

Agri-environment measures should contribute to the implementation of EU policies and strategies. However, provisions, which would commit more schemes specifically to biodiversity, are needed in many countries because the schemes implemented so far have focused more on soil and water protection, decrease of pesticide use and similar issues. This is necessary in order to meet the EU’s objective to halt the loss of biodiversity by 2010.

5.5 Harmonised support for stimulating organic agriculture

Organic agriculture has become an important tool for sustainable agriculture and should be supported in the RD programmes. Organic farming includes several different environmental and social benefits and could be considered as an integrated approach to develop agriculture and rural areas. The existing political support system, where no

external costs are internalised, motivates production-oriented support to organic farming until the 'polluter pays' principle is implemented.

Support for organic agriculture differs widely among MS and needs to be harmonised by specifying minimum and maximum support levels. There should be a requirement for both support for conversion to and maintenance of organic farming to be provided in the RD programmes.

Further it is very important to ensure the link between Rural Development Regulation and the Commission's Action Plan for Organic Farming.

A certain amount of support should be reserved for organic farming under all measures to ensure a balanced support eg with respect to investments, processing and marketing aids or farming advice/training. The agri-environmental measures are the most important instrument both for making up for the disadvantage of organic agriculture through the first pillar of the CAP (if SFP is based on historic yields) and to take into account the lower yields and higher labour costs of organic farming.

The conversion to organic farming and its implementation need a high level of special knowledge. Therefore it is important to support farming advisory for conversion period and afterwards. Special attention should be given to the new MS where agriculture is in general less intensive and where training and advisory services can foster organic farming very effectively.

Also special support for the creation of a market for organic products and information campaigns for consumers about the value of organic products are very much needed in those countries.

The support for organic farmers within agri-environmental schemes must not exclude them from possibility of participation in other agri-environmental measures (such as those aimed at increasing biodiversity).

5.6 Less Favoured Areas need environmental criteria

Integration of environmental issues can be significantly improved by adding environmental criteria to the LFA payments. The LFA payments focus on production disparities and aim to provide income support. With de-coupling taking place this should no longer be the focus: the existing designation should be reviewed and even the title of the scheme should be reconsidered (e.g. Environmental Areas at Risk). Funds should not be allocated on the basis of remoteness alone. These payments should be allocated to those areas where it is necessary to keep agriculture to safeguard biodiversity and/or landscape features. These purposes should be the main defining criteria and they should be adapted to regional environmental and social values (eg fresh water ecosystems, extensive livestock systems, landscapes with recreational or cultural value).

The LFA approach should therefore be maintained but more effectively targeted at high nature value areas where the need to meet broad environmental objectives is more

appropriate (i.e. adopting the characteristics of a simplified agri-environmental scheme). Unlike most agri-environmental schemes, which target specific outcomes and which are dependent on voluntary uptake by farmers, LFA designation should include targeting particular types of habitat or landscape at risk and a farmer will find himself automatically in an LFA (as with the 'Nitrate Sensitive Areas'). Receipt of LFAs payments should be dependent on farmers not only adhering to GFP requirements, but also to additional 'light green' conditions that reflect the environmental (and social) needs of a particular LFA (low input or preservation of traditional high nature value farming systems). There should also be a clear understanding of where LFAs overlap Natura 2000 sites, providing clear indication of where Article 16 should apply.

5.7 EIA for investments in agricultural holdings

Investments in agricultural holdings have to fulfil sustainability and animal welfare criteria. Along with a plan demonstrating the economic viability of a scheme, an Environmental Impact Assessment should be required in order to avoid investments in environmentally damaging enterprises (eg large scale unsustainable irrigation systems). Investments should stimulate new environmentally friendly technologies and processes, eg the production of renewable energy (only if environmentally friendly methods are used) and biogas installations could be supported. This would also diversify farm activities and create jobs in rural areas based on sustainable development principles.

5.8 Conditions for supporting afforestation

The EEB is not in favour of supporting afforestation, except in the following cases:

- conservation purposes: eg erosion or landslide prevention, water management, creation of ecological corridors, restoration of habitats
- investment in sustainable forest management: training, selective cutting vs. clearance, labour intensive management, reducing the use of heavy machinery, support for non-timber forest products

Funding should be granted only if certain conditions are met: Environmental Impact Assessment should be mandatory prior to afforestation and the extent of afforestation should be limited to a certain percentage; catchment areas under the Water Framework Directive could be used as reference area. Plantations, GMOs and alien species should always be excluded from financial support within the afforestation scheme.

Support should be available to both private and public forest owners. Fire prevention funding should come under a single regulation, i.e. EAGGF, rather than in both the Forest Focus Regulation and the EAGGF, as it is currently the case.

5.9 Special concerns of new Member States

There have been specific measures defined in Accession Treaties for the new Member States for the 2004-2006 period. As proper implementation will hardly be achieved by 2006, some of those measures should continue to be available from 2007 onwards:

LEADER+ (because of limited experience in public co-operation at the local level), farm advisory and extension services, compliance with Community standards and producer groups. This is due to limited financial resources for this 3-year time period and/or a lack of administrative capacity. Efforts should be made to strengthen the latter by 2006, so that the new MS have access to the whole suite of EU funds.

The introduction of new, more environmentally oriented farm advisory systems, will be of major importance for achieving much needed training and capacity building. NGOs should be involved in these services as partners. The emphasis should be on cross-compliance and environmentally sensitive management practices, agri-environmental schemes, access EU funds as well as on organisational management. Training should be given high priority as a part of RD and the possibility of making it a condition to apply for funding should be considered.

Educational measures to increase awareness and technical knowledge on environmental matters are not only vital for farmers but also for other rural dwellers, eg actors who will implement agri-environmental schemes.

Compliance with Community standards (merged with CAP reform meeting standards) will need urgent attention. Some countries will need a longer timeframe (beyond 2006) to comply with veterinary and sanitary standards, which enables producers to be eligible for any direct payment support. Further, it should be made clearer that compliance with regulations on organic farming (2092/91) should also be eligible for the 'compliance with Community standards' funding, because agri-environmental payments cannot compensate for high investment costs related to complying with organic animal husbandry regulation.

The establishment of producer groups for organic farmers has to be stimulated as they will need stronger support and more time to strengthen their position. This is especially important to 'nurture' the new generation of organic farmers, expected to 'grow out of' the agri-environmental.

*“LA AGRICULTURA: Base de la Política de
Desarrollo Rural Sostenible a partir del 2006”.*

OBSERVACIONES al Documento Comisión Europea:

“Extended Impact Assessment Rural Development Policy post 2006”.

***COORDINADORA DE ORGANIZACIONES DE
AGRICULTORES Y GANADEROS.***

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Francisco M. SÁNCHEZ ARENAS

Madrid, junio 2004.

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INTRODUCCIÓN.

La agricultura de muchas zonas rurales españolas tienen problemas de modernización y competitividad por lo que tendrá que seguir en un proceso de mejora e innovación. Estimamos que el proceso de modernización aún no se ha completado en muchas zonas, lo que justifica el apoyo a estrategias de adaptación y modernización que permitan superar las deficiencias estructurales, que limitan las posibilidades de competir de muchas explotaciones agrarias.

Por otro lado la II Conferencia de Desarrollo Rural celebrada en Salzburgo, la presentación de las nuevas perspectivas financieras así como el presente documento elaborado por la Comisión conforman un nuevo contexto de formulación de la nueva política de desarrollo rural.

El presente estudio trata de centrar el debate sobre el papel que desempeña la agricultura y la ganadería de los distintos territorios en el desarrollo rural. Para ello, se tratará de responder a las siguientes preguntas ¿estamos aprovechando bien los fondos de desarrollo rural dirigidos a la agricultura y ganadería?, ¿qué éxito ha tenido esta política en España?, ¿Qué propuestas de mejora se pueden formular?.

El presente documento se ha articulado en cuatro apartados diferenciados. En el primero de ellos se expone de forma descriptiva el conjunto de medidas de desarrollo rural que se encuentran en vigor para los años 2000-06. Seguidamente se realiza un *análisis de la aplicación* de las distintas medidas a nivel de España, identificando aquellos factores que han podido influir –positiva o negativamente- en el alcance de los objetivos de desarrollo rural asignados. A continuación, hemos considerado importante analizar las *nuevas perspectivas financieras 2007-13 en relación con el desarrollo rural* y los volúmenes financieros previstos para el nuevo período de programación. Finalmente se incluye un apartado relativo a las *conclusiones* principales del estudio de aplicación del desarrollo rural, principalmente en el período de programación actual 2000-06; si bien los objetivos de desarrollo rural son todavía difíciles de apreciar en gran parte de las medidas, debido al corto periodo de aplicación (2000-02), los resultados expuestos deben entenderse como tendencias y valoraciones, para tener en cuenta el diseño de la nueva política de desarrollo rural a aplicar a partir del año 2007, lo cual forma parte de las *recomendaciones* incluidas como propuesta de mejora de la política de desarrollo rural.

1. POLÍTICA DE DESARROLLO RURAL 2000-06 EN LA UE-15 Y ESPAÑA.

El Reglamento (CE) 1257/99 de apoyo al desarrollo rural, acordado en la Agenda 2000 para el período 2000-06 (Consejo Europeo, 1999), dispone de un conjunto variado y diverso de *22 medidas de desarrollo rural* para la consecución de distintos *objetivos*. Al conjunto de las medidas ha de añadirse otras cuatro más, aprobadas en la reciente reforma intermedia de la PAC (Consejo Europeo 2003). Las medidas de desarrollo rural pueden ser agrupadas en tres ejes o grupos relativos a la *mejora de la reestructuración y competitividad de la agricultura, la gestión del territorio y medioambiente* y, como tercer

grupo, la *diversificación y economía rural* (véase cuadro siguiente). Adicionalmente a este grupo de medidas, habría que añadir la iniciativa comunitaria LEADER + y el Programa PRODER 2.

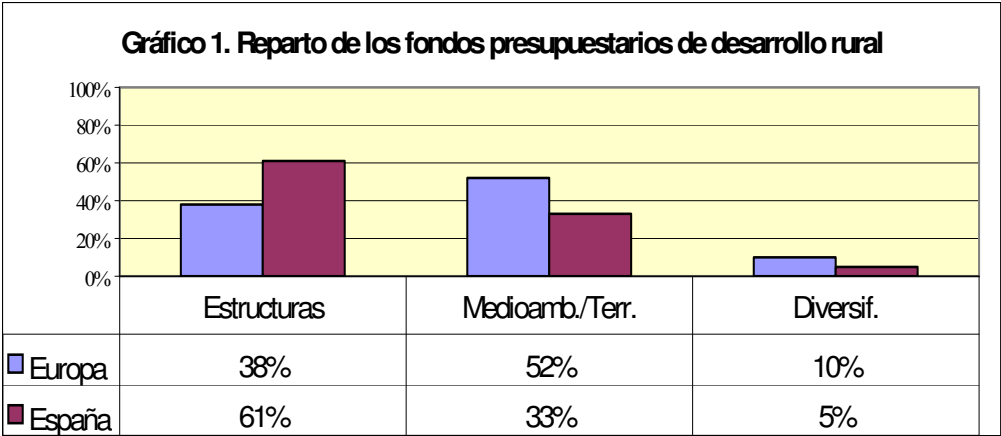
Cuadro 1. Objetivos y Medidas de Desarrollo Rural 2000-06.

| OBJETIVOS | MEDIDAS |
|--|---|
| <ul style="list-style-type: none"> - Mejora de las <i>estructuras de las explotaciones agrarias</i> y de la <i>transformación y comercialización</i> de los productos agrícolas; - <i>Reconversión y reorientación</i> de la capacidad de producción agraria, la introducción de <i>nuevas tecnologías</i> y la mejora de la <i>calidad</i> de los productos; - Fomento de la <i>producción no alimentaria</i>; - Desarrollo sostenible de los <i>bosques</i>; - <i>Diversificación</i> de las actividades; - Mantenimiento y consolidación de un <i>tejido social viable</i> en las zonas rurales; - Desarrollo de las <i>actividades económicas y el mantenimiento y creación de puestos de trabajo</i> con objeto de garantizar una mejor explotación del potencial intrínseco actual; - Mejora de las <i>condiciones de trabajo y de vida</i>; - Mantenimiento y fomento de <i>sistemas agrícolas de bajos insumos</i>; - Conservación y promoción de una naturaleza de alta calidad y de una <i>agricultura sostenible</i> que respete las exigencias medioambientales; - Eliminación de las <i>desigualdades entre hombres y mujeres y el fomento de iguales oportunidades</i> para ambos mediante el apoyo a proyectos cuya iniciativa y ejecución corra a cargo de mujeres. | <p><i>Reestructuración y competitividad:</i></p> <ol style="list-style-type: none"> 1. Inversiones en explotaciones agrarias; 2. Instalación de jóvenes agricultores; 3. Formación; 4. Cese anticipado de la actividad agraria; 5. Mejora de la transformación y comercialización de productos agrícolas; 6. Sistemas de calidad (1); 7. Información, Promoción y publicidad (1) 8. Cumplimiento de normas europeas (medioambiente, salud pública, sanidad animal y fitosanidad, bienestar animal y seguridad en el trabajo) (1) 9. Sistemas de asesoramiento para cumplimiento de normas (1) 10. Mejora de tierras, 11. Reparcelación de tierras, 12. Establecimiento servicios de sustitución y asistencia gestión de las explotaciones, 13. Comercialización de productos agrícolas de calidad; 14. Gestión de recursos hídricos, 15. Dlo. y mejora de infraestructuras relacionadas con la producción agraria; 16. Recuperación capacidad de producción agraria dañada por desastres naturales y establecimiento de medios de prevención adecuados. |
| | <p><i>Gestión del Territorio y Medioambiente:</i></p> <ol style="list-style-type: none"> 17. Zonas desfavorecidas y Zonas con limitaciones medioambientales específicas; 18. Medidas agroambientales y bienestar animal; 19. Forestación de Tierras Agrarias. 20. Otras medidas forestales 21. Protección medioambiente en conexión conservación paisaje y economía agr. forestal. |
| | <p><i>Diversificación económica y Economía Rural:</i></p> <ol style="list-style-type: none"> 22. Servicios de abastecimiento básicos para la economía y la población rurales; 23. Renovación y desarrollo de pueblos, protección-conservación patrimonio rural; 24. Diversificación de actividades en el ámbito agrario y ámbito afines; 25. Fomento del turismo y artesanado; e 26. Ingeniería financiera. |

(1) Nuevas medidas de desarrollo rural, aprobadas en la reforma intermedia de la PAC (Consejo, 2003 a)

Fuente: Consejo, 1999a y 2003a. Elaboración propia.

Si observamos los grupos de medidas, su financiación se reparte de la siguiente manera: para la mejora de la competitividad y adaptación de la agricultura un 61 y 38% de los fondos en España y Europa, respectivamente; para las zonas desfavorecidas y medidas agroambientales (medidas de gestión del medioambiente y territorio) un 33 y 52% de los fondos; y para las medidas de diversificación y economía rural un 5 y 10% (véase gráfico siguiente).



Fuente: Comisión Europea (2003b), MAPA. Elaboración propia.

2. ANÁLISIS DE LA POLÍTICA DE DESARROLLO RURAL ESPAÑOLA.

El cambio operado en regiones españolas menos desarrolladas ha sido positivo. Si observamos Andalucía (región objetivo nº1), su PIB/habitante ha pasado del 57,39% de la media comunitaria (UE-15) en el período 1994-96 a un 63,1% y 69,2% sobre la media comunitaria UE-15 y UE-25, respectivamente. En el caso de España esta mayor convergencia con Europa también se constata, al situarse el PIB *per cápita* para el año 2001 en el 83,9% y 92,4% de la UE-15 y UE-25, respectivamente.

No obstante, y a efectos de matizar los resultados de aplicación de la política de desarrollo rural, se considera necesario realizar un análisis de las principales medidas; para ello, se estudiará los tres tipos de medidas o ejes de desarrollo rural:

- *mejora de la reestructuración y competitividad de la agricultura,*
- *gestión del territorio y medioambiente y*
- *diversificación y economía rural.*

2.1. Medidas de desarrollo rural relativas a la mejora de la reestructuración y competitividad de la agricultura.

Si bien la Evaluación Intermedia realizada a las medidas estructurales de *inversión en explotaciones e instalación de jóvenes* (PROINTEC, 2003; TRAGSATEC, 2003) muestra que las ayudas han contribuido a modernizar las explotaciones agrarias en su conjunto, racionalizando los procesos productivos y haciendo más viables y competitivas las explotaciones agrarias; si bien, así mismo, la tendencia en la última década es la concentración y reducción del número de explotaciones y de la superficie labrada y mano de obra (según Censos Agrarios 1989 y 1999), se observa que el proceso de reestructuración no está consolidado puesto que la *dimensión física y económica* de las explotaciones en España es bastante pequeño, con un 84% de explotaciones de menos de 8 UDE y un 67% de las explotaciones con tierras de menos de 5 ha.(Censo Agrario, 1999; MAPA, 2003). Además la *estructura física de las explotaciones sigue presentando en España la imagen “dual”* que ha venido caracterizándola: Las explotaciones españolas con menos de 5 has. de SAU representan un 67% del total, mientras que las explotaciones entre 5 y 100 has representan tan solo un 30% (Censo Agrario, 1999); a este déficit hay que sumarle el alto nivel de parcelación de las explotaciones –10 aproximadamente por explotación- (*ibidem*). Por otro lado, a pesar del crecimiento de la *dimensión económica* media (el crecimiento del Margen Bruto Total/explotación ha sido el doble en España que en la UE-12), las explotaciones españolas no supera el 64% de la media europea (MAPA, 2003).

Las medidas dirigidas a la problemática estructural y de regeneración del sector agrario, *inversiones en explotaciones* (planes de mejora) e *instalación de jóvenes agricultores* han tenido una aplicación muy errática en los últimos años. Los niveles del año 2003 se sitúan por debajo de los conseguidos en el año anterior descendiendo planes de mejora en número e inversión un 38% así como instalación

de jóvenes que desciende un 5% en número e inversión (véase cuadro siguiente). También se produce un descenso en la aplicación de estas dos medidas respecto al final del período de programación de desarrollo rural anterior (1999). Si a ello se une que el número de solicitudes supera el número de expedientes aprobados, se deduce que la financiación concedida a estas dos medidas es insuficiente para atender las demandas de los beneficiarios, en función de los problemas estructurales del sector agrario.

Cuadro 2. Evolución Planes de Mejora e Instalación de Jóvenes en España.

| | | 1999 | 2000 | 2001 | 2002 | 2003 | 2003/02 | 2003/99 |
|---------------------|--------------------|--------|--------|--------|--------|--------|---------|---------|
| Planes Mejora | nº | 9.771 | 9.828 | 10.956 | 10.149 | 6.228 | -38,6% | -36,3% |
| Instalación Jóvenes | nº | 6.110 | 3.568 | 4.341 | 4.094 | 3.868 | -5,5% | -36,7% |
| Planes Mejora | Inversión (Meuros) | 384,17 | 350,59 | 475,83 | 512,05 | 315,08 | -38,5% | -18,0% |
| Instalación Jóvenes | Inversión (Meuros) | 223,08 | 111,42 | 178,99 | 193,79 | 202,62 | 4,6% | -9,2% |

Fuente: MAPA. Elaboración propia.

Otro problema de gran transcendencia en el sector agrario es la *masculinización de la población activa agraria*. Según la Comisión Europea (2002), una de cada cinco explotaciones está dirigida por una mujer. En España, según el último Censo Agrario (1999), el número de mujeres titulares persona física asciende a 503.768 que representa un 29,7% del total (1.697.214 personas físicas) mientras que en Andalucía la proporción es similar, un 26,05% (91.682 mujeres sobre un total de 351.816 titulares persona física). En toda Europa, se produce la misma situación: a pesar de trabajar hombre y mujer en la explotación agraria, el titular suele ser el marido. Además, si se analiza los datos sobre afiliación a la Seguridad Social en España, un 68% de las agricultoras no cotizan personalmente y un 74,2% de las cónyuges no cotizan. La explicación la encontramos en las dificultades para hacer frente a dos cuotas, en el caso de explotaciones de dimensiones reducidas y/o en la escasa valoración del trabajo desarrollado por las mujeres. Si observamos la dimensión económica desde la perspectiva de género, de cada 100 mujeres al frente de una explotación en UE-15, 68 dirigían una explotación de una dimensión económica inferior a 4 UDE y, sólo 3 dirigían una explotación de más de 40 UDE

(Comisión, 2002). En las explotaciones dirigidas por hombres estas cifras son de 52 y 9 respectivamente.

Analizando la aplicación de la medida estructural inversiones en explotaciones agrarias desde el punto de vista de género, la *creación de UTA* por parte de mujeres (740 en el período 2000-02 para España) apenas representa el 24% del total de UTAS creadas (3.035 para el mismo período en España) –cinco puntos inferior a la proporción de mujeres titulares sobre el total de personas físicas-; la mayor parte corresponde a los hombres que, con 2.295 UTAs, representa un 76% del total para dicho período. En el caso de Andalucía, la proporción es más favorable para las mujeres en el caso de la creación de UTAs (44,5% de UTAs corresponde a mujeres) mientras que la consolidación de UTAs por parte de mujeres es menor que a nivel nacional (véase cuadro siguiente).

Cuadro 3. Inversiones en explotaciones (n° UTAs) según género.

| | | Hombres | | Mujeres | | Total |
|--------------|----------------------|---------------|--------------|---------------|--------------|---------------|
| | | nº | % | nº | % | nº |
| Objetivo 1 | Creación | 2.174 | 74,8% | 732 | 25,2% | 2.906 |
| | Consolidación | 26.669 | 72,5% | 10.124 | 27,5% | 36.793 |
| Fuera Obj. 1 | Creación | 121 | 93,8% | 8 | 6,2% | 129 |
| | Consolidación | 12.137 | 90,1% | 1.340 | 9,9% | 13.477 |
| Total | Creación | 2.295 | 75,6% | 740 | 24,4% | 3.035 |
| | Consolidación | 38.806 | 77,2% | 11.464 | 22,8% | 50.270 |

Fuente: TRAGSATEC (2003) y PROINTEC (2003). Elaboración propia.

A pesar de que en las medidas de incorporación de jóvenes a la agricultura, las mujeres tienen prioridad en la concesión de las subvenciones para incorporación a la agricultura y ganadería (si tienen menos de cuarenta años, la ayuda se incrementa en un 10%), la corrección de la masculinización de la población activa agraria tampoco se resuelve a través de la medida de *instalación de jóvenes*. A falta de datos estadísticos sobre la incorporación a la actividad agraria desagregados por sexo, podemos observar que la proporción de mujeres en la creación y consolidación de UTAs es todavía menor: un promedio entre UTAs creadas y número de instalaciones de mujeres de 22% frente al 78% restante de los hombres (véase cuadro siguiente).

Cuadro 4. Instalaciones de jóvenes (n° y UTAs) según género.

| | Hombres | | Mujeres | | Total |
|------------------------------|---------|-----|---------|-----|-------|
| | nº | % | nº | % | |
| Objetivo 1 (n° UTAs creadas) | 6.886 | 76% | 2143 | 24% | 9.029 |
| Fuera Objetivo 1 (nº) | 2.070 | 79% | 555 | 21% | 2.625 |

| | | | | | |
|----------|--|-----|--|-----|--|
| Promedio | | 78% | | 22% | |
|----------|--|-----|--|-----|--|

Fuente: TRAGSATEC (2003) y PROINTEC (2003). Elaboración propia.

Otro de los problemas es el *envejecimiento de la población agraria*. Se estima que en el decenio 1999-2009 se producirán alrededor de 265.000 relevos en la titularidad de las explotaciones agrarias y que de los “nuevos” titulares, al menos 124.000, tendrán durante el decenio la condición de jóvenes agricultores y agricultoras y, por lo tanto, la posibilidad de acceder a las ayudas de instalación. Sin embargo, en el próximo decenio, de mantenerse el ritmo actual, se acogerán a estas ayudas unos 40.000 jóvenes en todo el Estado, cifra que apenas representa el 25% de los teóricos nuevos titulares jóvenes (MAPA, 2003). Junto a ello, la tendencia de las zonas de interior es la disminución de población, caracterizándose por tener un importante envejecimiento y masculinización, y con una natalidad escasa.

La medida socioestructural que, junto a la instalación de jóvenes, actúa sobre el problema de envejecimiento de la población agraria es el *cese anticipado*, orientado hacia la mejora de la estructura de la explotación agraria favoreciendo el cambio generacional. La aplicación de esta medida se encuentra muy concentrada en la Cornisa Cantábrica y Castilla y León, presentando una aplicación muy deficiente o nula en el Sur. Además las solicitudes nuevas de cada año sigue una tendencia en retroceso de un 6% anual durante el período 2000/02, pasando de las 2.182 altas en el año 2000 a las 1.784 del año 2002. La Evaluación Intermedia realizada a esta medida pone también de manifiesto que, aunque la viabilidad económica de las explotaciones tras la cesión ha mejorado, se transfiere una escasa superficie de tierra a otras explotaciones; se cuantifica que el proceso de reestructuración se “desvía” casi un tercio (32,4%) de la superficie total de las explotaciones “cesantes” (TRAGSATEC, 2003). Teniendo en cuenta estos datos y la desaparición numerosas de explotaciones (Censos Agrarios 1989 y 1999), no puede afirmarse que este programa haya tenido una considerable incidencia. Posiblemente se deba a que esta medida ha respondido en mayor medida a procesos de reestructuración sectorial que a procesos de relevo generacional y, al hecho de que muchos agricultores ya jubilados mantienen el cultivo de su explotación, es decir no se retiran realmente de la actividad agraria, lo que dificulta la reestructuración agraria.

Por otro lado, si analizamos la evolución de la *renta agraria* desde 1990, como indicador de la situación económica en la que ha de influir la política de desarrollo rural, en general y la estructural, en particular, aquélla, en términos reales, ha permanecido estancada en España durante los cinco años 1999-2003; se ha producido una bajada durante el último año 2003, a unos 13.902,8 millones euros reales. Supone además que desde 1990 la renta agraria no ha aumentado. Cabe mencionar que desde el año 1996 el valor de la renta agraria constante/real ha disminuido. Si en ese año el índice sobre 1990 era de 108,9 en el año 2003 dicho índice se ha situado en 101,0 lo que supone un descenso en términos reales de un - 7,3% (véase Cuadro siguiente).

Cuadro 5. Evolución de la renta agraria 1990-2003.

| | Renta agraria corriente | | Deflactor PIB (2) | Renta agraria real | |
|-----------------|-------------------------|-----------------|-------------------|------------------------------|-----------------|
| | Mio € corrientes (1) | Índice 1990=100 | 1990=100 | Mio € constantes (1)/(2)*100 | Índice 1990=100 |
| 1990 | 13.765,7 | 100 | 100 | 13.765,7 | 100 |
| 1991 | 13.717,1 | 99,6 | 106,9 | 12.831,7 | 93,2 |
| 1992 | 12.374,3 | 89,9 | 114,1 | 10.845,1 | 78,8 |
| 1993 | 14.640,3 | 106,4 | 119,3 | 12.271,8 | 89,1 |
| 1994 | 16.772,1 | 121,8 | 123,9 | 13.536,8 | 98,3 |
| 1995 | 17.342,0 | 126,0 | 130,0 | 13.340,0 | 96,9 |
| 1996 | 20.176,3 | 146,6 | 134,6 | 14.989,8 | 108,9 |
| 1997 | 21.059,1 | 153,0 | 137,7 | 15.293,5 | 111,1 |
| 1998 | 21.484,0 | 156,1 | 141,0 | 15.236,9 | 110,7 |
| 1999 | 19.833,8 | 144,1 | 144,9 | 13.687,9 | 99,4 |
| 2000 | 21.742,5 | 157,9 | 149,9 | 14.504,7 | 105,4 |
| 2001 (P) | 22.657,2 | 164,6 | 156,2 | 14.505,2 | 105,4 |
| 2002 (P) | 22.756,3 | 165,3 | 162,3 | 14.021,1 | 101,9 |
| 2003 (A) | 23593,0 | 171,4 | 169,7 | 13.902,8 | 101,0 |

(2) Deflactor PIB, Banco de España.

Fuente: MAPA. Elaboración propia.

Las medidas estructurales han favorecido, en cambio, un cambio positivo en la *calidad* de los productos como consecuencia de las inversiones, aunque no siempre el incremento de la calidad se ha traducido en mejoras de precios, sino que simplemente es una exigencia en

el mercado para poder vender los productos. Se responde, de esta forma, más a una estrategia de supervivencia ante la creciente competitividad que a una opción de diferenciación.

Analizando los *precios de productos agrícolas* en los diferentes eslabones de la cadena agroalimentaria, se puede observar la diferencia de cotizaciones entre los distintos agentes (agricultor, mayorista y consumidor). Así la diferencia es de 2,26 entre agricultor y mayorista³; dicho de otra forma, la participación del agricultor sobre la cotización de los mayoristas es de un 53%. Si analizamos la relación entre el agricultor y consumidor, observamos un deterioro mayor del primero. Así los productos agrarios multiplican por 4,74 veces su valor si relacionamos las cotizaciones del consumidor sobre los precios percibidos por el agricultor⁴; en este caso, el agricultor sólo participa en el beneficio una media de un 26%, valor muy bajo si se considera que estos productos apenas tienen transformación agroalimentaria (COAG, 2004).

A efectos de solventar este desequilibrio, **es esencial apoyar al sector agrario en la internalización de parte del valor añadido de la cadena agroalimentaria**. Para ello, se hace necesario impulsar la medida “mejora de la transformación y comercialización de los productos agrícolas”; para una aplicación efectiva de la misma, la Administración pública ha de considerar ciertos problemas en su aplicación. Uno de ellos, es la elevada necesidad de capital requerido para poner en marcha empresas de *transformación*, lo cual disuade a los agricultores de la posibilidad de emprender un proceso de integración hacia delante. Aunque en determinados sectores, como el vitivinícola y/o oleícola, sí se aprecia una cierta tendencia positiva de los agricultores a producir o a participar en cooperativas transformadoras, en otros subsectores agrarios la participación es testimonial. En el caso de la *comercialización*, la concentración de la oferta habrá de ser impulsada y acompañada con la creación y promoción de estructuras comerciales en las que participen de forma activa los agricultores.

2.2. Medidas de desarrollo rural relativas a la gestión del territorio/medioambiente.

Dentro del grupo de medidas de desarrollo rural dirigidas hacia el *medioambiente y gestión del territorio* destaca la **Indemnización Compensatoria (I.C.)** en zonas desfavorecidas. A pesar del objetivo al cual se dirige, contribuir a mantener una actividad agraria en comarcas con limitaciones naturales, se constata un descenso acusado del número de beneficiarios a

³ Los casos más significativos son los cítricos (el limón se multiplica por 5 y navelina por 4,58, si bien es cierto que las cotizaciones en origen son sobre árbol. La multiplicación desde origen hasta mayorista se multiplica por más de dos veces en los casos de Tomate liso para ensalada (2), zanahoria (2,18), manzana golden (2,39), pera (2,04). Datos MAPA, semana 2-8 febrero 2004.

⁴ Los cítricos son los productos donde se produce una mayor diferencia entre la cotización origen y consumidor (del orden de 10 veces). Le sigue la manzana Golden (5,11 veces más), tomate (4,94), zanahoria (4,68) y acelga (4,65). Datos MAPA, semana 2-8 febrero 2004.

lo largo de los últimos años (el descenso de beneficiarios se cifra en un 10,2% anual, al pasar de los 143.659 del año 2000 a los 96.665 del año 2003). Estos datos son un fiel reflejo de lo que está pasando en las zonas desfavorecidas de nuestro territorio, dónde se está abandonando de forma acelerada la actividad agrícola y ganadera. La Evaluación Intermedia de esta medida (UPM&Saborá, 2003) constata que la incidencia sobre la renta de los agricultores es muy *baja* y, al no existir diferenciación entre áreas según grado de marginalidad, la repercusión es mínima, mientras que en las mejores áreas se produce, en algunos casos, una sobrecompensación. También la incidencia de la IC en la diversificación de actividades es nula (las inversiones en la explotación y en la orientación productiva de la misma es prácticamente inexistente). Así mismo se produce una expulsión del sistema a los ganaderos más desfavorecidos que no cuentan con base territorial al utilizar rastrojeras y otros pastos de difícil justificación (debido al cambio en el criterio de la IC, ayuda por ha. en lugar de por cabeza de ganado).

Aunque la IC apenas tiene repercusión en el mantenimiento del uso agrario del suelo, este instrumento ha sido útil en la consecución de una agricultura más respetuosa con el medioambiente. Según la información obtenida de las entrevistas a expertos comarcales y encuesta a los beneficiarios, las Buenas Prácticas Agrarias habituales se cumplen mayoritariamente, y en las Zonas con dificultades especiales prácticamente el 100% (UPM&Saborá, 2003). No obstante, la aplicación de las Buenas Prácticas Agrarias se ha debido más a la presión de la Administración que a una concienciación del agricultor sobre los beneficios de desarrollar una agricultura sostenible. En este sentido, apenas el 1,6% de las explotaciones en Zonas de Montaña y el 3,3% en las Zonas con despoblamiento practican la agricultura ecológica (*ibidem*).

La aplicación del **programa agroambiental** muestra que el número de beneficiarios en todo el territorio español esta sufriendo un descenso importante a medida que avanza el programa 2000/2006. Si en el año 2000 fue un año en el que apenas se realizaron contratos al ser aprobado por la Comisión en noviembre, en los restantes años (2001-03) se ha producido una aplicación errática. El número de nuevos contratos del año 2003 (19.441) no llega a situarse en el número de contratos del 2001 (20.671), si bien se ha aumentado respecto al año 2002 (12.138). A pesar de que en España, el sector ganadero representa menos que el agrícola en el total de la Producción de la Rama Agraria, el número de contratos en ganadería respecto al total sólo supone entre un 2% del año 2003 (468 contratos ganaderos respecto a los 19.441 contratos totales) y el 7% del año 2002 (véase cuadro siguiente).

Cuadro 6. Evolución del número de contratos, medidas agroambientales.

| | 2001 | | 2002 | | 2003 | | 2003/02 | | 2003/01 | |
|--|------|-------------|------|---------|------|---------|---------|-------------|---------|-------------|
| | nº | has/ UGM | nº | has/UGM | nº | has/UGM | nº | has/ UGM | nº | has/ UGM |
| | | | | | | | | | | |

| | | | | | | | | | | |
|--|---------------|----------------|---------------|----------------|---------------|----------------|-------------|-------------|-------------|-------------|
| ESPAÑA | 20.671 | | 12.138 | | 19.941 | | 64% | | -4% | |
| AGRICULTURA | 19.959 | 393.157 | 11.235 | 786.903 | 19.473 | 573.709 | 73% | -27% | -2% | 46% |
| Agric. ecológica | 732 | 21.676 | 617 | 22.730 | 3.067 | 64.941 | 397% | 186% | 319% | 200% |
| Redn. Insumos (incl. Prodn. Integrada) | 5.158 | 39.889 | 2.164 | 29.786 | 1.853 | 22.782 | -14% | -24% | -64% | -43% |
| Rotación cultivos | 1.169 | 15.519 | 2.137 | 48.775 | 656 | 13.990 | -69% | -71% | -44% | -10% |
| Extensificación | 4.366 | 119.097 | 2.141 | 64.767 | 2.348 | 160.349 | 10% | 148% | -46% | 35% |
| Paisaje y naturaleza | 3.314 | 77.559 | 3.935 | 587.588 | 6.591 | 221.423 | 67% | -62% | 99% | 185% |
| Vds. Plantas amenazadas erosión genética | 0 | 0 | 4 | 4 | 259 | 1.893 | 6375% | 47225% | | |
| Otras acciones | 5.220 | 119.417 | 237 | 33.253 | 4.699 | 88.331 | 1883% | 166% | -10% | -26% |
| GANADERÍA | 712 | 9.188 | 903 | 10.188 | 468 | 5.120 | -48% | -50% | -34% | -44% |
| Vacuno | 526 | 6.382 | 145 | 3.481 | 172 | 1.284 | 19% | -63% | -67% | -80% |
| Ovino | 90 | 2.034 | 44 | 769 | 100 | 1.716 | 127% | 123% | 11% | -16% |
| Caprino | 0 | 0 | 31 | 272 | 60 | 1.096 | 94% | 303% | | |
| Equino | 81 | 707 | 660 | 5.045 | 57 | 308 | -91% | -94% | -30% | -56% |
| Porcino | 15 | 65 | 13 | 24 | 19 | 81 | 46% | 238% | 27% | 25% |
| Aves corral | 0 | 0 | 0 | 0 | 0 | 0 | | | | |
| Mezcla | 0 | 0 | 10 | 597 | 60 | 635 | 500% | 6% | | |

Fuente: MAPA (2002, 2003 y 2004). Elaboración propia.

La realidad de la aplicación de las medidas agroambientales se caracteriza por ser claramente insuficiente para hacer frente a todo el abanico de necesidades de las distintas explotaciones agrarias existentes y demandas sectoriales.

Tal como expone la *Evaluación Intermedia* del programa (TRAGSATEC 2003a), las agroambientales contribuyen a los objetivos anteriormente expuestos. En relación al *suelo*, contribuyen a solventar la contaminación (a través de la reducción de agroquímicos), erosión (buenas prácticas) y estructura y fertilidad (abonado orgánico, siembra leguminosas). En lo que respecta al *agua* la contribución se estima en una mayor calidad (reducción agroquímicos) y cantidad (ahorro por siembra cultivos autóctonos). La *biodiversidad* también es favorecida a través de la preservación de la Flora y Fauna silvestre (aumento número de animales, proliferación vegetación espontánea), hábitats terrestres o acuáticos/humedales de elevado valor natural, infraestructura ecológica (mantenimiento de áreas seminaturales, banales) y preservación de especies cultivadas y

razas de animales en peligro de extinción. Asimismo las agroambientales se dirigen hacia la mejora y conservación del *paisaje*, así como la *cultura y tradiciones* (a través de la recuperación de prácticas agrícolas o cultivos tradicionales). Ante objetivos tan ambiciosos, problemas presupuestarios y de gestión, principalmente, están limitando la eficacia del Programa agroambiental. El hecho de que el Programa comparta presupuesto con otras medidas de acompañamiento, e incluso con el anterior Programa Agroambiental, en aquellas Autonomías en las que todavía está en vigor, ha condicionado y limitado enormemente el desarrollo del mismo. Es necesario mejorar la Evaluación del Programa Agroambiental a través del diseño de indicadores agroambientales a través de los cuales logremos cuantificar (no mencionar) las externalidades positivas de las distintas medidas.

En lo que respecta a la introducción de la componente transversal del medioambiente en los distintos programas de desarrollo rural, hay que indicar que la E.I. realizada a la medida Gestión de recursos hídricos (TRAGSATEC, 2003b; PROINTEC, 2003), muestra como ésta ha contribuido a proteger y mejorar el medio ambiente de las zonas rurales. Los nuevos regadíos ayudan a frenar los fenómenos de erosión y mejorar el paisaje (al introducir una mayor diversidad en zonas áridas), mientras que las actuaciones de consolidación y mejora permiten el ahorro de agua, la utilización más eficiente del recurso (a través de unos sistemas de riego con menos pérdidas) y la reducción de la contaminación. Además los Planes de Mejora incorporan unos compromisos mínimos de buenas prácticas que aseguran que los beneficiarios mantienen o inician la realización de prácticas respetuosas con el medio. No obstante, son muy pocos los proyectos de estas medidas que se orientan a la realización de una actividad en régimen de agricultura ecológica.

La medida de *reforestación de tierras agrarias* ha contribuido a incrementar paulatinamente la superficie forestada lo que tiene un impacto medioambiental muy positivo. Ello podría suponer un aumento proporcional de la cantidad de carbono fijado, compensando emisiones que puedan producir en otros sectores económicos. Otro de los beneficios medioambientales es el menor perjuicio realizado a los recursos naturales tales como erosión del suelo o la contaminación, en comparación con la actividad agrícola o la contribución positiva hacia la flora y fauna y el paisaje rural. No obstante, el impacto económico, según la Evaluación Intermedia, no parece haber sido muy intenso (Dirección de producción de tecnologías y servicios agrarios, 2003).

2.3. Medidas de Desarrollo Rural relativas a la diversificación y economía rural.

A pesar de que uno de los objetivos perseguidos por las medidas de desarrollo rural es “impulsar la diversificación de las actividades agrarias”, por ejemplo mediante inversiones destinadas a la clasificación, acondicionamiento, fabricación, transformación y comercialización de los productos agrarios de la propia explotación, el número de expedientes, según la evaluación intermedia de los Programas de Mejoras de Estructuras, ha sido irrelevante; en el caso de las regiones objetivo 1, sólo se han aprobado 27 expedientes de diversificación de actividades agrarias de la medida de inversiones; 26 en el Principado de Asturias y uno en Andalucía (PROINTEC, 2003).

Analizando la reorganización de las explotaciones de productos excedentarios (leche o cereales) hacia productos con buenas salidas comerciales, la Evaluación Intermedia del P.O. muestra que tan solo un 0,53% de los expedientes de regiones Objetivo nº1 con orientación de cereales o leche, han introducido variaciones consideradas como no excedentarias en sus nuevas producciones. Los agricultores se encuentran más influidos para el cambio de actividad por la evolución de las OCMs. Por su parte, los proyectos de diversificación agraria son realizados en el marco de otros Programas Operativos (caso de la mejora de la transformación y comercialización de los productos agrícolas) y en la Iniciativa Comunitaria Leader+; dichos proyectos de diversificación son puestos escasamente en marcha por agricultores y ganaderos.

La iniciativa y programa LEADER+ y PRODER 2, respectivamente dirigidos a la *diversificación agraria*, denota una escasa participación de agricultores y ganaderos. A pesar de que la agricultura continúa siendo el eje sobre el que gira la actividad económica y la creación de empleo en amplias zonas de nuestro territorio, estas actuaciones habrían de integrar, en mayor medida, proyectos protagonizados por agricultores y ganaderos a fin de completar y diversificar sus rentas.

3. NUEVAS PERSPECTIVAS FINANCIERAS 2007-13. CASO DEL DESARROLLO RURAL.

El pasado 10 de febrero de 2004 la Comisión Europea (2004a) adoptó una Comunicación en la que se recoge la propuesta de planificación presupuestaria para el período 2007-13⁵. Las perspectivas financieras establecen como una de sus prioridades el *desarrollo sostenible*. Éste abarca, asimismo, las siguientes tres prioridades: *competitividad, cohesión y gestión sostenible y la protección de los recursos naturales*.

La tercera de las prioridades del desarrollo sostenible formulado en las perspectivas financieras *-gestión sostenible y protección de los recursos naturales-* constituye la rúbrica

⁵ Este documento ya ha sido transmitido al Consejo y el Parlamento Europeo para su discusión. Está previsto que la Comisión desarrolle propuestas legislativas concretas, en base a esta Comunicación, que serían hechas públicas a mediados de 2004. La decisión del Consejo sobre este asunto (que requiere unanimidad) está prevista para mediados de 2005.

2 del nuevo marco financiero 2007-13; aunque no se trata de una propuesta oficial de la Comisión (a la espera de su documento de julio), esta línea presupuestaria se desglosaría, asimismo, en 4 subrúbricas destinadas a financiar diferentes políticas: 2.1.1. Protección medioambiental; 2.1.2. Agricultura; 2.1.3. Desarrollo rural; y 2.1.4. Recursos pesqueros.

3.1. 3.1. El desarrollo rural en las nuevas perspectivas financieras.

La subrúbrica relativa a *desarrollo rural* (2.1.3.), incluida en la tercera de las prioridades del desarrollo sostenible -gestión sostenible y protección de los recursos naturales-, se centrará en tres grandes objetivos: (i) competitividad mediante el apoyo a la reestructuración (ayudas a la inversión, jóvenes agricultores, información y promoción, etc.); (ii) Medioambiente y medio rural; y (iii) diversificación económica y mejora de la calidad de vida en zonas rurales. Dentro del principio de “un único fondo por programa” la Comisión Europea propone que todas las medidas de desarrollo rural para todas las regiones se reagrupen en un único sistema de financiación, programación, gestión financiera y control, es decir un *fondo único para el desarrollo rural*⁶. Las nuevas perspectivas financieras 2007-13 indican un incremento del presupuesto destinado a desarrollo rural de un 25%, al pasar de 10.544 Mio€ en 2006 a los 13.205 Mio€ de 2.013. Este aumento de fondos se destinará a los países de la ampliación que presentan enormes necesidades; por su parte, el presupuesto para los actuales Estados Miembros actuales se reduce un 8% en el período 2007/13; al incrementar estos fondos con los provenientes de la modulación de las ayudas directas del primer pilar de la PAC, el presupuesto desciende un 3,4% (pasando de 8.373 a 8.091 Mio€) (véase Cuadro siguiente).

Por consiguiente, para alcanzar los objetivos del desarrollo rural los EEEMM actuales (UE-15) tendrán que aumentar de forma considerable la cofinanciación nacional de estas políticas (*renacionalización del gasto*); estaremos así en un escenario más flexible y subsidiario, pero también menos común y menos solidario para aquellas regiones que carecen de capacidad de financiación. Además queda sin resolver el problema de la financiación de las nuevas medidas de desarrollo rural aprobadas en la Reforma Intermedia de la PAC (caso de la calidad, cumplimiento de normas, bienestar animal). Los recursos procedentes de la modulación son claramente insuficientes para las grandes necesidades que se presentan.

Cuadro 7. Dotación financiera Desarrollo Rural 2007-13 (Mio€, Precios 2004).

| | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2013/ 06 (*) |
|--|--------|---------|--------|--------|--------|--------|--------|--------|-----------------|
| 2. Gestión sostenible y protección recursos naturales | 56.015 | 571.780 | 57.900 | 58.115 | 57.980 | 57.850 | 57.825 | 57.805 | 3,2% |

⁶ Dentro de este instrumento se incluiría el gasto correspondiente al actual “segundo pilar de la PAC” (FEOGA-Garantía), el correspondiente al FEOGA-Orientación y parte del ejecutado bajo la iniciativa comunitaria LEADER+.

| | | | | | | | | | |
|--|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Entre ellos: Desarrollo Rural (1) | 10.544 | 11.759 | 12.235 | 12.700 | 12.825 | 12.925 | 13.077 | 13.205 | 25,2% |
| Bulgaria Rumania (2) | | 863 | 1.222 | 1.591 | 1.618 | 1.645 | 1.674 | 1.705 | 97,6% |
| UE-10 (3) | 2.806 | 3.663 | 38 | 3.899 | 4.022 | 4.145 | 4.264 | 4.385 | 56,3% |
| UE-12 Nuevos EEMM (4)=(2)+(3) | 2.806 | 4.526 | 1.260 | 5.490 | 5.640 | 5.790 | 5.938 | 6.090 | 117,0% |
| UE-15 (5)=(1)-(4) | 7.738 | 7.233 | 7.233 | 7.210 | 7.186 | 7.162 | 7.139 | 7.115 | -8,1% |
| Modulación UE-15 (6) | 635 | 879 | 1.077 | 1.056 | 1.035 | 1.015 | 995 | 976 | 53,7% |
| UE-15 después modulación (5)+(6) | 8.373 | 8.112 | 8.310 | 8.266 | 8.221 | 8.177 | 8.134 | 8.091 | -3,4% |

(*) La variación de Bulgaria y Rumanía es la resultante entre 2013 y 2007,

al no disponer de financiación en 2006 por incorporarse posteriormente a la UE.

Fuente: Comisión Europea/Perspectivas Financieras. Elaboración propia.

3.2. Visión del nuevo marco financiero 2007-13 y la nueva política de cohesión.

Dentro de estas perspectivas financieras 2007-13, la rúbrica de gestión sostenible y protección de los recursos naturales (donde se integra la agricultura) pasará a representar del 46 al 36% del total del presupuesto comunitario. De esta forma continúa la tendencia por la que el peso de la agricultura y ganadería europea disminuye de la misma forma que ocurrió en la programación anterior 2000-06 donde, por ejemplo, las medidas de desarrollo rural de la PAC se redujeron en el presupuesto comunitario aproximadamente un 4%⁷.

⁷ La programación 2000-06 eliminó también el FEOGA-O fuera de las regiones del Objetivo nº1; el papel asignado a este Fondo estructural quedó solamente operativo en las regiones del Objetivo 1 y no para todas las medidas. Asimismo desapareció el objetivo estructural agrario horizontal 5a que cubría todo el territorio europeo, mientras que el objetivo 5b regionalizado, pasó a encuadrarse en un objetivo más amplio (Objetivo nº2), dirigido a todas las zonas con problemas de reestructuración (industriales, urbanas, pesqueras y rurales). Así, si el antiguo objetivo 5b cubría el 9% de la población de la Unión, el nuevo objetivo 2-rural cubre únicamente un 5%.

Cuadro 8. Cuadro financiero PAC (créditos comprometido). Mio€.

| | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|--|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Total créditos comprometido | 120.688 | 133.560 | 138.700 | 143.140 | 146.670 | 150.200 | 154.315 | 158.450 |
| Gestión sostenible y protección de los RN | 56.015 | 57.180 | 57.900 | 58.115 | 57.980 | 57.850 | 57.825 | 57.805 |
| Entre ellos: Agricultura Gastos mercado y pagos directos (1) | 43.735 | 43.500 | 43.676 | 43.354 | 43.034 | 42.714 | 42.506 | 42.293 |
| Destinados a Bulgaria y Rumanía (2) | | 380 | 976 | 1.075 | 1.170 | 1.261 | 1.459 | 1.648 |
| Destinados a UE-25 (3a) = (1)+(2) (precios constantes, 2004) | 43.735 | 43.120 | 42.700 | 42.279 | 41.864 | 41.453 | 41.047 | 40.645 |
| Destinados a UE-25 (3b) (precios corrientes). Acuerdo Bruselas | 45.502 | 45.759 | 46.217 | 46.679 | 47.146 | 47.617 | 48.093 | 48.574 |
| Destinados a la UE-10 (4) | 2.388 | 2.812 | 3.011 | 3.481 | 3.959 | 4.417 | 4.760 | 5.171 |
| Destinados a la UE-15 (5) | 41.348 | 40.308 | 39.686 | 38.798 | 37.906 | 37.037 | 36.287 | 35.473 |
| Modulación UE-15 (6) | 635 | 879 | 1.077 | 1.056 | 1.035 | 1.015 | 995 | 976 |
| Reducción margen imprevistos (7) | | 300 | 300 | 300 | 300 | 300 | 300 | 300 |

| | | | | | | | | |
|-------------------|--------|--------|--------|--------|--------|--------|--------|--------|
| UE-15 (5)-(6)-(7) | 40.713 | 39.129 | 38.309 | 37.442 | 36.571 | 35.722 | 34.992 | 34.197 |
|-------------------|--------|--------|--------|--------|--------|--------|--------|--------|

Fuente: Comisión Europea. Elaboración propia.

La reducción financiera también se produciría en la subrúbrica 2.1.2. de agricultura, como parte de lo dispuesto en la rúbrica gestión sostenible y protección de los recursos naturales. La Comunicación de la Comisión sobre perspectivas financieras recoge el cuadro financiero establecido para la PAC el pasado Consejo Europeo de octubre 2002. El límite de gasto PAC para la actual UE-15 se reducirá en un 20% durante el período 2003-13 en magnitudes reales, según las cifras manejadas por la Comisión Europea. Teniendo en cuenta la aplicación de la modulación, el descenso de las ayudas se cifra entre un 21-22% (pudiendo llegar al 25-30%, en caso de que los gastos agrarios de la ampliación se eleven).

Otra de las cuatro subrúbricas (2.1.1) es la relativa a la *protección medioambiental*. La inclusión de ésta, debería promover la constitución de una partida presupuestaria para objetivos medioambientales muy costosos (por ejemplo Natura 2000). Una transferencia de fondos desde la agricultura y el desarrollo rural hacia el medioambiente impediría a la agricultura alcanzar sus objetivos, en un momento de profunda crisis del mundo agrario y rural.

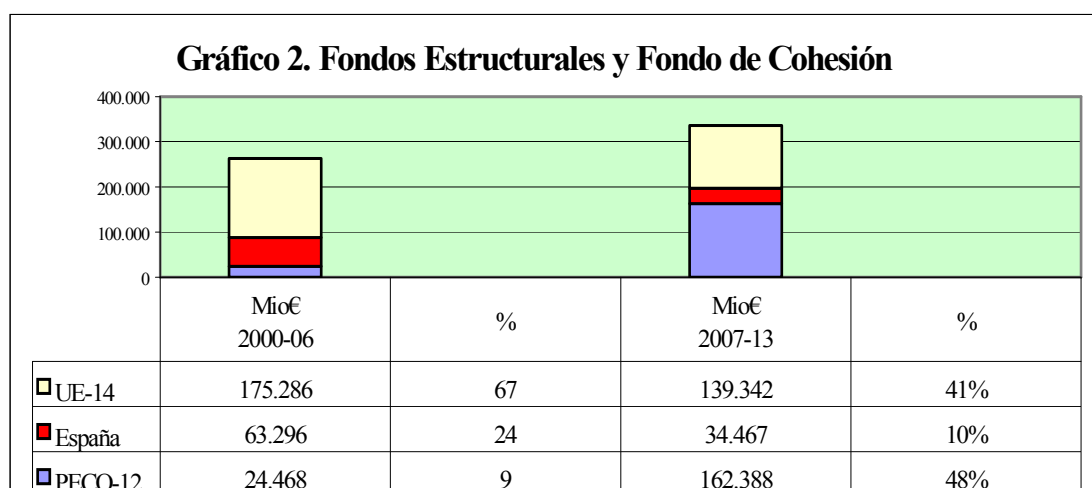
La Comisión (2004b) presentó el *Tercer Informe sobre la Cohesión*, el pasado mes de febrero. En éste, se expone su visión de lo que será la política de cohesión en la Unión ampliada para el período 2007-13. La dotación para el período completo es de 336.300 millones €, ya descontados gastos de administración y Fondo de Solidaridad. La cifra propuesta equivale al 0,41% de la Renta Nacional Bruta (RNB) y al 34% del presupuesto de la Unión. Este montante se repartirá de forma indicativa en tres prioridades principales:

- (i) Convergencia, apoyando la creación de empleo y crecimiento en los EE.MM. y las regiones menos desarrolladas; se asignarán el 78% de los recursos. Esta prioridad implicaría a Regiones con un Producto Nacional Bruto (PNB) *per cápita* inferior al 75% de la media comunitaria, Regiones afectadas por el “efecto estadístico” (PNB *per cápita* inferior al 75% del promedio en la UE-15 pero superior al 75% de la UE-25) y al Fondo de Cohesión para aquellos EE.MM con un PNB *per cápita* por debajo del 90% del promedio comunitario;
- (ii) Competitividad regional y empleo que, a través de programas regionales, ayudaría a anticipar y promover el cambio económico en las zonas industriales, urbanas y rurales de las regiones. Mediante los programas nacionales se ayudaría a la población a anticipar y adaptarse al cambio económico, sosteniendo políticas de pleno empleo, mejorando la calidad y productividad en el trabajo y la inclusión social. Esta prioridad absorbería el 18% de los fondos; y
- (iii) Cooperación territorial, aprovechando la experiencia de INTERREG se seguirá promoviendo una integración armoniosa y equilibrada del territorio de la Unión mediante un apoyo a la cooperación transfronteriza y transnacional. Se destinará el 4% de los recursos.

El presupuesto de la UE se distribuirá, durante el período 2007-13, prácticamente a partes iguales entre la actual UE-15 y los países de la ampliación. A partir de 2011, los países de la ampliación ya absorberán más recursos que el resto de la actual Unión. Bajo esta propuesta, España será el país más afectado respecto a la situación actual. En el caso de la prioridad de convergencia, que es la que recibe el grueso de los fondos, España se encuentra en una situación caracterizada por los siguientes elementos: (i) la imposibilidad de poder acceder al Fondo de Cohesión, ya que en 2001 el PIB *per cápita* español representa el 92,4% del promedio UE-25; (ii) una reducción del número de regiones españolas que cumplen el criterio de encontrarse por debajo del 75% del PIB *per cápita* de la futura UE-25, permaneciendo solamente cuatro regiones por debajo; pudiendo incluso superar el citado nivel cuando se tome la decisión de asignación de fondos (Andalucía - 69,2% del PIB UE-25-, Extremadura -58,7%-, Castilla- La Mancha -73,7%- y Galicia -

73%); (iii) el “efecto estadístico” afectaría a dos regiones: Asturias (71,9% del PIB UE15) y Murcia (70,5%); y (iv) la no asignación a ninguna de las dos situaciones anteriores de Castilla y León, Canarias y Comunidad Valenciana, que actualmente se benefician por ser calificadas objetivo 1.

Dado todo lo anterior, es previsible que España vea reducida su participación en el total de Fondos Estructurales y de Cohesión desde el 24% actual al 10% propuesto por la Comisión para el nuevo período de programación. En volumen, el Estado solamente percibiría el 55% de lo que percibe actualmente. Los fondos se recibirían de forma decreciente a partir de 2007 hasta 2013.



Fuente: Comisión Europea. Elaboración propia.

4. CONCLUSIONES Y RECOMENDACIONES. PROPUESTAS DE MEJORA.

4.1. Conclusiones.

La política de desarrollo rural de la Unión Europea o “segundo pilar” de la PAC no fue suficientemente reforzada en los acuerdos de la Cumbre de Berlín que cerraron la negociación de la Agenda 2000. Tanto el menú de medidas que recoge, recopilación de lo que ya se estaba haciendo anteriormente, como los recursos presupuestarios disponibles resultan insuficientes para los objetivos que se marcaron en su día.

Una vez analizados los resultados de las evaluaciones intermedias realizadas a los distintos programas de desarrollo rural así como la evolución del sector agrario y medio rural, parece demostrado que los mismos están siendo heterogéneos en lo que a la ***eficacia*** se refiere, por cuanto unas medidas tienen una ejecución por encima de lo previsto en contraposición a otras que presentan una tendencia regresiva. La ***eficiencia*** del desarrollo rural establecido en función de los efectos obtenidos en relación con los medios empleados tampoco parece ser óptima. Por ejemplo, muchos agricultores ya jubilados mantienen el cultivo de su explotación, es decir no se retiran realmente de la actividad agraria, lo que dificulta la reestructuración agraria. Dado que en el futuro el número de agricultores que se jubilarán de modo natural, es decir sin necesidad de ayudas al cese anticipado, será muy elevado, convendría acometer los cambios normativos necesarios para que dichos agricultores abandonaran el cultivo de sus tierras, liberando así un importante volumen de tierras para la reestructuración. De poco sirve destinar presupuesto público al cese anticipado de agricultores, si no se acometen acciones sobre los agricultores ya jubilados que siguen siendo titulares de explotación en activo.

Por otro lado, el impacto de la política de desarrollo rural (medido a través de los efectos del programa a medio y largo plazo) parece ser ambientalmente positivo mientras que en los aspectos sociales y económicos no parece ser muy intenso. Así, muchas de las explotaciones que actualmente pertenecen a los estratos intermedios de dimensión económica (4-16 UDE) tendrán dificultades para alcanzar la viabilidad y eficiencia económica, incluso a pesar de la reactivación de las políticas estructurales.

La aplicación de la política de desarrollo rural sigue siendo ***pertinente*** (adecuación de los objetivos de los programas a las necesidades sectoriales y problemas socioeconómicos), por cuanto siguen estando presentes problemas del sector agrario y medio rural. Uno de los principales problemas es la falta de jóvenes con capacidad financiera y patrimonial suficiente, bien para hacerse cargo de las explotaciones como cesionarios (mediante la medida de cese anticipado) bien a través de la instalación como joven agricultor.

De acuerdo con lo expuesto anteriormente, la ***utilidad*** de la política de desarrollo rural española, por la que se correlacionan las necesidades sectoriales y problemas socioeconómicos conocidos, está aquejada de las limitaciones anteriores, aunque lo que se ha conseguido ha sido positivo. Ello demuestra la necesidad de aplicar políticas más próximas a cada región como forma de integrar la diversidad. Un ejemplo de ello es el territorio incluido en las zonas desfavorecidas; éste es muy amplio, supone más del 75% de

la superficie de las autonomías de referencia, y muy diverso en lo que respecta a su población, características físicas, socioeconómicas y agrarias. A pesar de ello, contamos con una clasificación de las zonas desfavorecidas sólo en tres clases (zonas de montaña, despoblamiento y dificultades especiales). Esto significa que se está aplicando un único programa territorial agrario a áreas con problemáticas radicalmente distintas, mientras algunas tienen en general buenas condiciones, otras son marginales. Como consecuencia, la Indemnización Compensatoria no responde a las necesidades más acuciantes y es prescindible en otros. En las áreas con rendimientos más bajos la ayuda IC no llega a compensar el 50% de déficit de renta, mientras que en las mejores se produce una sobrecompensación (UPM&Saborá, 2003). Se hace necesario, asimismo, dirigir las medidas agroambientales hacia la realidad productiva de los distintos territorios. En este sentido, COAG (2003) identifica que la medida 4.1. (“Lucha contra la erosión en medios frágiles en cultivos leñosos en pendiente o terrazas”) no realiza adecuadamente la caracterización de las explotaciones en lo que a la pendiente se refiere; por su parte, la medida 3.3 (producción integrada) no compensa adecuadamente a los agricultores de avellano que la adoptan en función de los beneficios medioambientales aportados en la lucha contra la erosión y conservación de la biodiversidad. Acompañando a la inadecuada adaptación de las medidas agroambientales, existen posibilidades de formulación de nuevas medidas agroambientales atendiendo a la diversidad de las distintos sistemas agronómicos, condiciones naturales y territorios. Hay que destacar la existencia de propuestas presentadas a la Comisión de Seguimiento del Programa de Medidas de Acompañamiento de la PAC en relación con el diseño de una nueva medida agroambiental para el arroz que, independientemente de la medida 5.1. agrupe nuevos compromisos (COAG, 2003)⁸.

La política de desarrollo rural presenta inconvenientes sobre su *viabilidad* (mantenimiento en el tiempo de los efectos conseguidos) puesto que, en la actualidad, no es previsible que las medidas de desarrollo rural funcionen al margen del apoyo de fondos financieros públicos.

Por último, el análisis de las dotaciones presupuestarias para abordar los objetivos de una política de desarrollo rural ambiciosa, a la vez que tremendamente costosa, nos indica que la Comisión pretende que la política de desarrollo rural siga sin ser apoyada adecuadamente, desde el punto de vista financiero, al menos hasta el 2013⁹. La cantidad,

⁸ Los compromisos formulados son los siguientes: (i) racionalización del tratamiento de quironómidos y hongos; (ii) compromisos respecto al cangrejo rojo americano y otros invertebrados relativos a la reparación de daños, control del caudal de agua por obstrucción de la infraestructura de riego y, en caso de captura, mantenimiento de sus restos en el arrozal para alimentos de las aves; (y (iii) sobresiembra en presencia de aves y modificación del calendario de siembra.

⁹ En el período actual 2000-06, la Agenda 2000 estableció también una escasa financiación de las acciones estructurales para las *medidas de desarrollo rural y complementarias*, 4.600 millones euros.

lamentablemente, está infradotada para lograr con éxito los altos objetivos que se les asignan. Ante esta falta de presupuesto, se hace necesario una dotación adecuada del mismo así como el establecimiento de mecanismos idóneos para una adecuada Gestión de los actuales y futuros programas de Desarrollo Rural así como la particularización de las políticas de desarrollo rural a las características del medio físico, geográfico, humano.

4.2. Recomendaciones.

Aunque no ha sido objeto de este estudio el análisis de la PAC, el estudio de la aplicación de su segundo pilar muestra la no conveniencia de intercambiar primer por segundo pilar, al tratarse de políticas complementarias. El pilar del desarrollo rural resulta muy limitado como instrumento de política agraria y no está concebido para apoyar la renta de los agricultores (excepción hecha de la medida de indemnización compensatoria) ni para estabilizar los mercados agrarios. El enfoque adecuado sería proponer medidas para corregir las distorsiones que existen dentro del primer pilar, principalmente en lo que se refiere al reparto injusto del apoyo entre explotaciones, sectores y regiones-zonas. Actualmente el 80% de los Fondos del primer pilar se destina a tan solo un 20% de los beneficiarios. Esta desigualdad en el reparto de las ayudas se acompaña con un ritmo elevado de desaparición de Explotaciones Agrarias Familiares en las diferentes regiones de España y de la Unión Europea.

Por su parte, las distintas medidas de desarrollo rural (2º pilar) tendrán que someterse a un proceso de adecuación a la realidad productiva y diversidad de la agricultura española. De cara al futuro, se necesita impulsar decididamente el “segundo pilar de la PAC” si queremos afrontar los grandes retos que se presentan a la agricultura y ganadería europeas.

Como recomendaciones generales hemos estimado la necesidad de intensificar los tres grupos de Medidas de Desarrollo Rural (en adelante MDR) siguientes: (i) MDR en relación con la *reestructuración y mejora de la competitividad de la agricultura*; (ii) MDR vinculadas al medioambiente y gestión del territorio (*Zonas desfavorecidas y Agroambientales*); y (iii) MDR vinculadas a la *economía y comunidad rural, principalmente diversificación*. Los tres grupos de medidas han de priorizar entre sus componentes transversales la formación, los servicios de gestión, la incorporación de jóvenes, el medioambiente y la promoción de igualdad de oportunidades. Este último aspecto, es recogido en el Reglamento de aplicación de Fondos Estructurales por el cual se establece que éstos deberán contribuir a eliminar desigualdades y a promover la igualdad de género en las acciones financiadas con cargo a dichos fondos (Consejo Europeo, 1999b).

Por orden de prioridad se recomienda, dentro del conjunto de medidas de REESTRUCTURACIÓN/COMPETITIVIDAD, articular dos grupos de medidas:

- 1) Medidas estructurales que modernicen y regeneren el sector agrario que comprenderían: Inversión en explotaciones, instalación de jóvenes junto al cese anticipado¹⁰, gestión de recursos hídricos, medidas que faciliten el acceso de las mujeres a las ayudas y la (co)titularidad de las explotaciones agrarias (además del diseño del Estatuto Jurídico de la Agricultora), mejora y reparcelación de tierras, creación de un banco de tierras, desarrollo y mejora de infraestructuras relacionadas con la producción agraria y recuperación de la capacidad agraria dañada por desastres naturales así como el establecimiento de medios de prevención adecuados (donde se incluiría la creación de un sistema de seguros agrarios a nivel europeo).

Las medidas de reestructuración/competitividad deberían de ser la prioridad a nivel de política socioestructural dado, fundamentalmente, el menor nivel productivo y económico de la explotación española respecto a la europea y el acuciante problema de envejecimiento que presenta el campo español. Los datos sobre estructura física y económica apuntan hacia las dos vías estructurales por las cuales las explotaciones españolas pueden aproximar su dimensión económica a la media comunitaria. Por un lado, deben acelerar el *redimensionamiento físico* para aumentar su tamaño (SAU/explotación), incorporando las tierras liberadas en los procesos de desaparición de explotaciones (por abandono de la actividad, jubilación, etc.) o bien mediante la concentración de explotaciones (fórmulas cooperativas, societarias, etc.). Por otro lado, las explotaciones españolas deben *mejorar sus resultados económicos* (MBT/explotación), reduciendo sus costes de producción, aumentando los rendimientos o, cuando ello sea compatible con las políticas de mercados (O.C.M.), intensificando las producciones (en definitiva, mejorando el MBT/SAU).

Los recursos presupuestarios hacia este grupo de medidas habrían de ser aumentados. Además estas medidas habrían de estar vinculadas a otras tales como reordenación de derechos de producción (caso de la cuota lechera), régimen de transmisión de explotaciones y arrendamientos rústicos, entre otros. Igualmente se recomienda la realización de una mayor sensibilización y difusión, en especial a los colectivos de jóvenes y mujeres. Finalmente, y tal y como señala la Evaluación Intermedia al P.O. Mejora de estructuras y de los sistemas de producción agrarios

¹⁰ Para el caso del cese anticipado, se propone elevar la ayuda recibida por los agricultores cedentes que se acojan a esta medida así como su extensión a la totalidad del territorio español. En la actualidad los cedentes están recibiendo un 12% menos de los previsto (6.000€/persona para todos los años del período de programación). Así mismo se propone la puesta en marcha de una bolsa de beneficiarios para facilitar contactos entre cesionarios y cedentes sin parentesco o conexión física, por ejemplo, por pertenecer a comarcas diferentes, incluso de otra Comunidad.

en las Regiones de Objetivo nº 1 (PROINTEC, 2004), sería necesario la realización de una diferenciación de indicadores de resultado y de impacto por géneros y edad; ello no supondría un incremento de indicadores y mejoraría la evaluación de la eficacia y eficiencia en las explotaciones gestionadas por mujeres o jóvenes.

- 2) **Medidas de innovación** que posibilite a los/las agricultores/as la internalización de valor añadido de sus producciones, entre las que se encontrarían: Mejora de la transformación y comercialización de productos agrícolas así como la promoción de la calidad; implementación de medidas relativas a las Nuevas Tecnologías de la Información y Comunicación (NTIC), que impulsen la sociedad del conocimiento en el sector agrario.

La agricultura encierra un gran potencial de generación de riqueza. En el futuro el énfasis en el incremento de los rendimientos se desviará hacia la calidad, la innovación y el incremento del valor añadido de los productos, como forma de responder a las demandas de la sociedad e incrementar los ingresos de las explotaciones agrarias. Por todo ello, se hace necesario un esfuerzo de la administración para destinar, en la medida de lo posible, fondos que permitan la financiación de proyectos dirigidos, prioritariamente, a la innovación, la implantación de mejoras de agroindustrias y la comercialización asociativa (acortando al cadena comercializadora y/o intensificando la venta directa), por parte del colectivo de agricultores y ganaderos.

Una de las medidas de desarrollo rural esencial debería ser la *calidad alimentaria*, mediante el desarrollo de las Denominaciones de Origen Protegidas (DOP) y las Indicaciones Geográficas de Producción (IGP) instaladas y desarrolladas por agricultores. Esta medida fomentaría la innovación y competitividad de las explotaciones, por lo que se habría de dirigir la mayor parte de los recursos financieros procedentes de la modulación de los pagos directos; se estima que el presupuesto a asignar a España, en este concepto, ascenderá a 184,2 millones euros anuales (que supone una cuota del 16% sobre el total de la Unión Europea). La redistribución de fondos obtenidos entre los Estados miembros se distribuirá de tal forma que el 80% se queda en el EEMM y el 20% restante se repartirá basándose en criterios de superficie agrícola, empleo agrario y PIB *per cápita*. La Comisión ha estimado que la dotación de fondos para el Desarrollo Rural se incrementará en 1.200 millones de euros. Aplicando entre el 15 y 16 % se obtiene la cifra que recibe España (184,2 millones de euros). El porcentaje anterior (15-16%) se determina por lo que representa la agricultura española sobre el total de los quince UE: empleo (15,6%), superficie (19,5%) y valor añadido total de la agricultura española sobre los quince (15,5%) de esta cantidad.

El segundo grupo de **MDR son las relativas a la GESTIÓN DEL TERRITORIO/MEDIOAMBIENTE.** Para una adecuada aplicación de éstas ha de considerarse que el modelo de desarrollo rural sostenible ha de plasmarse a dos niveles (doble acepción de sostenibilidad), mediante una perspectiva socio-económica, que garantice la pervivencia de las explotaciones familiares y de sistemas productivos viables

en el mundo rural que impidan el éxodo demográfico y mediante una perspectiva estrictamente medioambiental, consolidando prácticas agrícolas compatibles con el medio.

Desde el punto de vista *socioeconómico* la filosofía de la principal medida, Indemnización Compensatoria, es buena; no obstante, la escasa cuantía la hace ineficaz. La IC debe centrarse en las áreas con mayores dificultades, lo que permitiría subir la ayuda a niveles que realmente se noten en la renta y favorezca fehacientemente el cumplimiento de los objetivos. Por todo ello, se hace necesario que nuevos fondos financieros dedicados al desarrollo rural se destinen al impulso de esta medida. Además habría que introducir mecanismos nuevos en la diferenciación de las distintas zonas rurales. Definición de una nueva tipología de las zonas rurales sobre la base de criterios socioeconómicos y medioambientales objetivos. Esto permitirá la mejor identificación de las distintas problemáticas agrorurales y, en consecuencia, una mejora orientación de los programas de desarrollo rural. En concreto, es ineludible dar una respuesta a los territorios rurales más proclives al despoblamiento. Sería necesario conocer en profundidad los territorios de aplicación (en función de variables tales como nivel de servicios y equipamientos sociales de la zona, oportunidades de trabajo en otros sectores, comunicaciones y cercanía o lejanía de la zona respecto a núcleos de población importantes) de manera que se pudieran establecer medidas de adaptación a los mismos.

Desde la perspectiva *medioambiental* se hace necesario reconocer y valorar económicamente el aporte de la agricultura multifuncional al conjunto de la sociedad en forma de bienes y servicios públicos. Se ha de evaluar los costes de la política de protección ambiental de la UE incluida como una de las subrúbricas de las perspectivas financieras 2007-13, junto a la agricultura y desarrollo rural, en el marco de la rúbrica de gestión sostenible y protección de los recursos naturales. En consecuencia, habrá de destinarse recursos presupuestarios a dichos objetivos, estando la financiación claramente diferenciada de la destinada a la política agraria y de desarrollo rural. Además el principio de medioambiente necesita de indicadores capaces de cuantificar las externalidades (positivas y negativas) que realmente puede provocar la actividad agraria. Dichos indicadores podrán hacer referencia a la calidad y cantidad de los recursos naturales, las especies de flora y fauna o hábitats en las zonas de actuación, las características y dimensiones de elementos en las explotaciones con función ecológica y paisajística –como setos, muretes, etc.-; de esta forma podrá determinarse, de manera eficaz y detallada, el alcance de los objetivos establecidos.

Por su parte, los niveles de ayuda de las *medidas agroambientales* han de ser elevados afín de compensar adecuadamente el *lucro cesante* y los *costes* generados a los agricultores. Es un objetivo prioritario la necesidad de mantener las producciones agrícolas en aquellas zonas rurales en las que son fundamentales para garantizar la conservación de espacios naturales; se estima, por tanto, que los mayores costes que ocasionan las técnicas de cultivo respetuosas con el medio ambiente justificarían el establecimiento de la adecuada

compensación medioambiental. Se considera necesario revisar en profundidad el Programa Agroambiental, con el fin de definir al máximo los compromisos, detallando las diferencias entre los compromisos propios de las ayudas y las diversas Normas Técnicas de producción ya implantadas, por ejemplo las de Producción Integrada o Ecológica. En el caso de la agricultura ecológica, se hace necesario establecer un Programa de apoyo que resuelva la multitud de problemas tales como acceso a la tierra, los circuitos de comercialización largos e irracionales, el régimen de ayudas a los productores, las trabas legislativas, los agravios comparativos entre los Estados Miembros debido a la diferencia de capacidad financiera de las regiones, etc.

Hemos de apostar hacia el desarrollo de un sistema de ayudas multifuncionales donde no sólo se ligen a cuestiones productivas sino también a otras funciones no alimentarias de la agricultura relativas a cuestiones sociales (para evitar el despoblamiento de zonas rurales) medioambientales (provisión de bienes y servicios públicos tales como Biodiversidad, paisaje) y territoriales (protección de áreas naturales). Para todo ello, es necesario el diseño de Sistemas de evaluación y valoración de las funciones no alimentarias de determinados sistemas agronómicos (provisión de bienes y servicios públicos). El concepto de multifuncionalidad debe ser concretado sin más demora. Además se hace necesario conocer y cuantificar lo que la sociedad desea de la agricultura. En España, los resultados de diversos estudios sobre provisión de determinados bienes y servicios públicos por la agricultura, indican que la cuantía que la sociedad estaría dispuesta a pagar a los agricultores por proveer tales bienes y servicios públicos es bastante reducida¹¹. Para ello sería necesario incentivar un entorno favorable a la sostenibilidad ambiental que proporciona la agricultura.

El **tercer grupo de medidas de desarrollo rural** que se recomienda son las dirigidas a la **DIVERSIFICACIÓN AGRARIA Y ECONOMÍA RURAL**. Para un amplio grupo de explotaciones es fundamental reforzar los programas de desarrollo rural que contribuyan a la diversificación de la economía rural, permitiendo así que estas explotaciones sobrevivan gracias a las rentas obtenidas en las actividades de diversificación, dentro o fuera de la explotación. Las medidas de diversificación son un instrumento útil para aquellos agricultores y agricultoras que pongan en marcha nuevas formas de valorización del patrimonio natural y cultural. Se ha de intensificar la participación de los/las agricultores/as en estas medidas para lo que se hace necesario establecer mecanismos para su mayor implicación. Además en los procesos de diversificación

¹¹ Véase en AZQUETA, D. Y PÉREZ, L. (eds) (1996): Gestión de Espacios Naturales. La demanda de servicios recreativos. Mc Graw-Hill, Madrid y KRISTRÖN Y RIERA P. (1997): "El método de valoración contingente. Aplicaciones al medio rural español" Revista Española de Economía Agraria, 179: 133-167. Citado en SUMPSI, JM (2003).

agraria ha de establecerse nuevas formas de actuación a fin de incorporar de manera más efectiva la perspectiva de género. Se hace necesario incorporar en las medidas de publicidad aspectos que modifiquen los estereotipos tradicionales sobre el rol de la mujer en la actividad agraria, promoviendo que se pase de una ayuda familiar a la involucración efectiva en la gestión de explotaciones. Sería recomendable, asimismo, articular mecanismos que favorezcan la participación de las mujeres en las *entidades asociativas agrarias*.

Al mismo tiempo, se hace necesario que, en el marco de las medidas a implantar para desarrollar la diversificación y la economía rural, las Administraciones públicas intensifiquen la puesta a disposición de los agricultores y medio rural de todas aquellas infraestructuras y servicios, relacionados directamente con la producción tales como comunicación, nuevas tecnologías, transportes así como con el medio rural (sanidad, educación, entre otras), que propicien un adecuado desarrollo económico de las zonas rurales donde se encuentran instaladas las empresas agrarias, afin de que éstas puedan desarrollar de forma eficaz y eficiente los distintos productos y servicios y su disposición en el mercado. De esta forma, lograremos una diversificación de la economía rural que tenga como pilar la agricultura. Será necesario una coordinación interdepartamental e interinstitucional que permita aplicar todas estas medidas con un enfoque integral.

Acompañando a los tres tipos de medidas de desarrollo rural anteriormente expuestas, es imprescindible avanzar en los siguientes elementos horizontales:

- **Desarrollo del enfoque contractual de las medidas de desarrollo rural.** Cada explotación agraria debe ser el centro, el objetivo del desarrollo rural, evolucionando hacia la adopción de un Contrato Territorial de Explotación (CTE) entre los agricultores y sociedad. El instrumento instaurado por la Comisión en el reglamento horizontal de la reforma intermedia de la PAC (desacoplamiento/pago único) (Consejo, 2003b) incitará a que se ejerza la actividad agraria sólo en aquellos territorios dónde sea rentable a precios de mercado (independientemente de que el productor posea o no el derecho a pago único desacoplado). Esto es, la agricultura será ejercida sólo por las explotaciones competitivas. Parece apropiado la necesidad de apoyar a las explotaciones viables, entendiendo aquellas que desempeñen funciones complementarias a las estrictamente productivas. El CTE sería un instrumento útil al superar el enfoque a través de líneas de ayuda. Este instrumento presenta dificultades prácticas, requiere importantes cambios institucionales en la Administración Agraria y genera elevados costes financieros; no obstante, este nuevo enfoque favorecerá la sinergia entre las diferentes medidas;

- **simplificación de la financiación del desarrollo rural a través de un único fondo de tipo estructural**, que actúe en todo el territorio de la Unión Europea con un único régimen financiero que contemple la disociación pagos/compromisos. El FEOGA-Garantía no es el fondo adecuado para financiar medidas plurianuales de desarrollo

rural, ya que no permite reportar fondos de un ejercicio a otro. Por ello, se propone la creación de un *Fondo Estructural y de Desarrollo Rural* (FEDR) dirigido a apoyar la modernización de las estructuras agrarias y medio rural;

- proporcionar a los potenciales receptores de las ayudas, y a los beneficiarios de las mismas, la mejor **información posible sobre ayudas disponibles** (utilizando, en el caso que sea posible, las Nuevas Tecnologías de Información y Comunicación), fecha de convocatoria de las mismas; se ha de tratar de simplificar las gestiones a realizar y, en su caso, aclarar al máximo los compromisos de las Actuaciones;
- Se recomienda impulsar los **Comités de Seguimiento de las distintas medidas/programas de desarrollo rural**, hacerlos más *analíticos* (no sólo de seguimiento sino también de evaluación), *participativos* (recogiendo las opiniones de todos los sectores implicados en las diversas Actuaciones, como Organizaciones Profesionales), dando una mayor difusión de las decisiones tomadas; y por último
- Impulsar el **asociacionismo agrario y redes** que logren movilizar una mayor proporción de recursos voluntarios y colectivos. De esta forma, se ha de intensificar la integración de agricultores en entidades asociativas, articular nuevos servicios comunes que contribuyan a la realización de una agricultura multifuncional, desarrollar una adecuada estructura administrativa y comercial, entre otros.

La realización del mercado único, la apertura del mercado interior a economías agrarias con ventajas comparativas naturales y la presencia aún de deficiencias estructurales en la agricultura española, hacen que el modelo agrícola se vea en la necesidad de mejorar su competitividad. En consecuencia, y teniendo en cuenta las deficiencias estructurales de la agricultura y su escasa participación en el sistema agroalimentario, se ha de reforzar el eje de medidas de desarrollo rural destinadas a la reestructuración y competitividad de la agricultura a través de inversiones que reduzcan costes e innoven y diversifiquen las actividades de producción hacia la internalización del valor añadido de las producciones agrarias por parte de los agricultores/as. Adicionalmente y ante la debilitación de los instrumentos de regulación de los mercados, la futura política de desarrollo rural a aplicar debería de intensificar, asimismo, el segundo eje de protección/gestión del medioambiente y ordenación del territorio, basado en medidas que, enmarcadas en un contrato territorial de explotación, consoliden la instauración de ayudas multifuncionales basadas en el conocimiento y la valoración de funciones no alimentarias de determinados sistemas agronómicos. De esta forma, y con la participación de los agricultores y las agricultoras podrá garantizarse la *cohesión económica y social de las zonas rurales en el marco de un desarrollo sostenible y de solidaridad territorial*.

Extended Impact Assessment
Rural Development Policy Post 2006

Notes sur le document stratégique sur les orientations à donner au RDR à partir de 2006

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1. COMMENTAIRES GENERAUX SUR LE DOCUMENT

Les remarques qui suivent s'inscrivent essentiellement dans l'optique d'une discussion sous l'angle « environnemental », en considérant principalement l'agriculture (et dans une moindre mesure la forêt) qui, avec 90% de la surface de l'Europe rurale, sont les facteurs d'impacts majeurs. Le développement rural dans sa dimension sociétale est peu considéré ici.

Le document soumis rappelle des points importants pour la compréhension du 2^{ème} pilier de la PAC.

Néanmoins, des points significatifs semblent insuffisamment soulignés :

- Le fait que les thèmes économiques, environnementaux et sociaux sont étroitement liés au sein du processus de développement des exploitations agricoles. Sans que ce point soit absent, on retrouve une certaine séparation des objectifs et des moyens d'actions dans les trois axes proposés. Autrement dit : des régions à priorité environnementale, des régions à priorité économique, des régions à priorité sociale.
- Ce diagnostic occulte un fait majeur dans le développement de l'agriculture européenne : la dégradation de l'environnement, qu'il s'agisse de l'intensification ou de la déprise des systèmes traditionnels, est un processus global. « Moderniser » une exploitation bovine en adoptant des pratiques intensives, c'est la mettre en concurrence avec d'autres exploitations extensives qui, placées sur le même marché, se retrouvent en situation de désavantage relatif. Autrement dit, protéger l'environnement à l'échelle européenne, c'est à la fois maintenir les systèmes favorables à l'environnement (ce à quoi tout le monde s'accorde), mais c'est prévenir la concurrence des systèmes qui les menacent (ce qui est plus rarement souligné, et en tout état de causes peu présent dans le document discuté ici). L'axe économique a une forte composante environnementale.

- Ce constat avait présent dès la réforme des fonds structurels de 1988 dans le sens où la stratégie en matière de modernisation des exploitations (axe 1) avait été de favoriser la diversification et désengorger les marchés excédentaires. Cette ligne stratégique, pertinente, est présente depuis lors. Pour les aspects environnementaux (axe 2), les mesures de soutien d'adoption de pratiques favorables à l'environnement apparaissent pertinentes dans leur nature.
- Une question fondamentale serait alors l'évaluation des politiques structurelles sous l'angle de la compréhension « fine » de pourquoi les objectifs présents depuis la fin des années 80 ne sont globalement toujours pas atteints. Pourquoi, en marge de progrès environnementaux certains, les facteurs d'érosion de l'environnement restent inchangés (avec une contribution des politiques structurelles dans ce sens). Dans les grandes lignes, des études auxquelles nous — AScA — avons pu participer au plan national (France) et communautaire montrent que les facteurs organisationnels, humains et politiques sont aussi importants que les objectifs définis et les mesures allouées. La meilleure politique « sur le papier » — et les politiques actuelles du deuxième pilier sont satisfaisantes sur ce point — n'obtiennent pas les résultats escomptés si les acteurs en charge de leur mise en œuvre n'œuvrent pas dans le même sens. Ce constat me semble central et insuffisamment présent dans les prémisses des propositions faites dans le document. On ne saurait se contenter d'une simple analyse « top down » comme quoi la Commission définirait les bons objectifs et outils qui seraient dévoyés dans leur mise en œuvre subsidiaire. Chacun a sa responsabilité à son niveau dans les succès et les carences de la mise en œuvre du deuxième pilier de la PAC.

2. COMMENTAIRES ET PROPOSITIONS SUR LA PARTIE 3 DU DOCUMENT « ACHIEVING THE OBJECTIVES »

La présente discussion est hiérarchisée selon la logique suivante, qui consiste à déboucher sur des positions concrètes et constructives :

- Partant du principe que l'on doit se positionner par rapport aux 3 propositions du document (ce n'est pas le lieu de proposer une quatrième option), nous les discutons d'abord dans leur ensemble pour donner un avis sur celle qui nous semble préférable.
- Des propositions d'amendement seront faites dans ce cadre.

2.1. Discussion générale sur les options présentées :

Les trois options présentent des degrés d'ambition et de changement croissants.

- Les options 2 et 3 sont novatrices, ce qui est un facteur favorable au regard des limites des effets du 1^{er} pilier en matière d'environnement. Néanmoins elles présentent des incertitudes qui en limitent potentiellement la portée, voire sont susceptibles de conduire à des contre-effets dans certains cas.
- Le principe d'une planification stratégique communautaire d'ensemble qui serait déclinée au niveau des États membres n'apporte pas la garantie d'une efficacité accrue. Dans le passé, ce ne sont pas les principes communautaires qui ont fait défaut — encore une fois, la simple application du règlement 950/97 sur la modernisation des exploitations et de sa reprise dans le 1257/99 serait déjà une bonne chose — mais la manière dont ils ont été gérés à tous les niveaux, du local à l'euro-péen.
- Les systèmes de contrôle par les indicateurs et l'association des porteurs d'enjeux (*stakeholders*) est bonne dans le principe, mais le passé a aussi montré les limites de ces systèmes quand ils sont conduits dans une optique formelle. On ne peut considérer que la cohérence de la politique serait essentiellement au niveau local — subsidiaire — la Commission n'ayant qu'un rôle de contrôle *ex post*. Par exemple, les différences d'approches entre États membres en matière de Codes de Bonnes pratiques agricoles peut aussi bien s'interpréter comme une carence des EM adoptant une approche « faible » (ce qui est vrai) que comme celle de la Commission qui se contente de donner des directions en transférant ses responsabilités.
- On peut alors craindre que cette option conduise davantage à un affichage formel de bonne politique et un « jeu » de contrôle — formel — de la part de la Commission qu'à une réelle dynamique de développement durable. Cette crainte apparaît d'autant plus réelle si l'on considère la séparation des axes : par exemple, les critères environnementaux ne sont pas explicités dans l'axe 1 « compétitivité ». L'axe 2 est essentiellement zoné. On peut craindre un développement dual : des zones compétitives, des zones environnementales...
- En l'absence d'une évaluation stratégique qui pointerait les responsabilités propres de chacun des acteurs en charge de la conception et la mise en œuvre des politiques, il semble au total prématuré de partir sur des bases prometteuses sur le papier, mais insuffisamment explicitées. Ce constat prend une dimension particulière si l'on considère, en outre, que la réforme du 1^{er} pilier de juin 2003 ouvre déjà beaucoup le champ des possibles : les réformes radicales, comme celles proposées par les options 2 et 3, méritent davantage d'analyse et de concertation. Elles peuvent être néanmoins conservées à plus long terme.
- Une analyse plus 'fine' nous conduit à considérer que l'option 3 n'est pas satisfaisante. La concentration des moyens sur des cibles mieux définies est une idée importante. Mais, conformément à l'analyse proposée ci-dessus, il semble pertinent de pouvoir mettre l'accent sur la diversification dans les zones les plus productives. L'option 3 est plus « zonée » que « territoriale ».

- L’option 1 semble préférable « par défaut ». Parce qu’elle conserve les schémas existants, elle permet une adaptation plus graduelle. Cette adaptation est sans doute insuffisante pour réellement atteindre les objectifs environnementaux, mais elle me semble plus réaliste que celle des options 2 et 3. Au total, c’est davantage sur le processus que sur le fond que l’on peut défendre cette option : l’exemple français a montré les dommages que faisait un processus de réforme continu — les CTE, puis les CAD 4 ans plus tard — : sur le papier (comme les options 2 et 3), tout est pertinent ; mais sur le terrain les acteurs environnementaux, moins à même de maîtriser les changements des réformes, se retrouvent désorganisés. Dans le contexte de réforme de la PAC de 2003, il me semble prioritaire de conforter l’existant et de donner du temps au temps.

2.2. Propositions d’améliorations à apporter à l’option 1

Les critiques faites aux options 2 et 3 s’appliquent également à l’option 1 : « l’amélioration » du statu quo ne doit pas être que formelle.

- Ainsi, l’analyse Forces/Faiblesses/Opportunités/Menaces (SWOT) apparaît comme un point essentiel. Mais, sur le fond, elle doit reposer sur une méthodologie mettant en évidence la diversité des options de développement envisageables, en intégrant une évaluation croisée des axes : l’axe 1 doit être aussi évalué sous les angles environnementaux et sociaux, l’axe 2 sous les angles économiques et social, l’axe 3 sous les angles économiques et environnementaux. Autrement dit, il ne s’agit pas de simplement justifier « ce qui est déjà dans les cartons ».
- Les règles de consultation des *stakeholders* doivent être précisées de manière à ce que cette consultation ne soit pas purement formelle. Au total, des moyens financiers et humains doivent être dégagés dès cette phase de conception : (1) pour réaliser des évaluations ex ante (selon l’approche SWOT) par des organismes indépendants — et non pas uniquement des services des ministères en charge de l’agriculture qui sauront présenter les programmes RD dans les formes — (2) en construisant un processus de participation effectif, associant les ONG environnementales et les partenaires du développement agricole et rural. Les documents nécessaires, le *timing* des réunions doivent permettre la participation de toutes les parties convoquées.
- Le maintien des 26 mesures possibles n’est pas de nature à rendre ce pilier vraiment efficace. À partir du moment où l’on peut tout faire partout, l’efficacité stratégique se dilue nécessairement. Des critères d’éligibilité devraient être alors davantage discutés et définis.
- Le partage des enveloppes entre axes doit être explicite et plus clairement mettre l’accent sur les mesures agri-environnementales. Si l’on se réfère aux schémas de la

page 8 du document, il apparaît logique que les « fonctions environnementales » étant essentiellement à la charge du 2^{ème} pilier, celui-ci rééquilibre la politique de marché. Ainsi, un affichage de 30% pour l'axe 2, 30% pour l'axe 3 comme taux minimums et un taux maximum de 20% pour l'axe 1 serait de nature à renforcer la crédibilité de l'option 1 (considérant que la compétitivité a d'autres voies pour se réaliser).

- L'efficacité des Codes de Bonnes pratiques agricoles n'est pas suffisamment analysée. À partir du moment, où il s'agit de les intégrer dans les stratégies proposées, il est important d'en mesurer la portée effective et de lancer un programme d'évaluation sur ce point.

RURALITE-ENVIRONNEMENT-DEVELOPPEMENT

RURALITY-ENVIRONMENT-DEVELOPMENT

Association internationale



- Le suivi et l'évaluation ex post doivent s'inspirer des principes proposés pour l'évaluation ex ante.

Une politique pour les territoires ruraux d'Europe

R.E.D. plébiscite une approche territoriale qui renforce l'indispensable positionnement des territoires ruraux dans la politique de cohésion

L'agriculture et la forêt inscrites

en secteurs d'activités structurants des territoires ruraux

Selon le rapport « Extended impact assessment rural development policy post 2006 » qu'a fait connaître la Commission fin mai, les territoires ruraux recouvrent 90% de l'espace européen et constituent ainsi de fait un des socles de la politique de cohésion territoriale de l'Union européenne.

La proposition formulée par R.E.D. fin 2003 « Pour une politique européenne de développement rural post 2006 » en soulignait déjà l'importance :

« Ces territoires ruraux sont aussi les terrains où s'enracinent la diversité des cultures et une grande partie du patrimoine naturel architectural et historique qui font l'identité européenne. Espaces d'activités, de culture, de production de biens et de services, ils contribuent aussi au bien-être de l'ensemble de la société par les réponses qu'ils peuvent fournir face aux demandes sociétales en matière de nature, d'accueil, de diversité paysagère,... »

Les territoires ruraux : des pôles de développement au cœur des enjeux de la cohésion

Les territoires ruraux sont donc des pôles de développement à favoriser pour réussir la cohésion attendue à l'échelle de l'U.E. et des Régions.

Pour R.E.D. - cf. notre « proposition pour une politique européenne de développement rural » rédigée sur base d'une large consultation et soutenue dans ses grandes lignes par le Mouvement Européen de la Ruralité - , **les territoires ruraux doivent être clairement positionnés en pôles de développement partenaires des pôles urbains.** Dans sa proposition, RED défend en effet le principe d'un développement équilibré de pôles urbains et ruraux, en interrelation forte, pour soutenir la cohésion au niveau de l'U.E. et des régions.

Associant largement à travers le Mouvement Européen de la Ruralité l'ensemble des acteurs de l'U.E., RED s'est mobilisé pour que cet enjeu soit inscrit dans le rapport de la cohésion, dans la Convention et dans les politiques de développement rural des Etats membres et des Régions de l'UE.

RED a alors regretté que cette référence susceptible de libérer la mobilisation convergente des acteurs urbains et ruraux n'ait été suggérée qu'à travers l'inscription dans la Convention européenne de la notion de « cohésion territoriale » et dans le 3ème rapport de la cohésion au travers de l'évocation des relations ville-campagne.

RED considère que la cohésion au sein des régions et à l'échelle de l'U.E. doit reposer sur les deux piliers urbains et ruraux qui la fondent et sur leurs interrelations : le contexte des nouveaux pays adhérents renforce encore la nécessité d'affirmer et de soutenir cette assertion. Les attentes des pays émergents du pourtour méditerranéen, d'Afrique et d'Amérique du Sud s'inscrivent dans ce même enjeu.

3 options pour la politique de développement rural esquissée par la Commission

Dans le rapport précité, la Commission esquisse trois options pour soutenir la politique rurale pressentie lors de la conférence de Salzbourg. Toutes trois sont organisées autour de 3 axes :

- la compétitivité orientée vers l'agriculture et la forêt,
- la gestion durable de l'espace naturel,
- le développement rural au sens large. Cette troisième option privilégie l'approche territoriale en concentrant les aides sur les régions en retard de développement

La proposition de R.E.D. pour une politique territoriale des territoires ruraux

La mise en œuvre de cette politique rurale européenne se basera sur un document stratégique préparé par la Commission européenne et approuvé par le Parlement européen.

L'ambition politique est de faire des territoires ruraux de véritables pôles de développement, en interrelation forte avec les pôles urbains. L'élaboration et la mise en œuvre de projets de développement adossés à une démarche globale s'appuyant sur des projets de territoire au sein desquels l'agriculture, la forêt et les espaces naturels, par leur fonction ou leurs caractéristiques, occupent une place fondamentale, en constituent l'enjeu.

Une liaison étroite entre la politique de développement rural et la politique de cohésion est impérative pour garantir la cohérence de l'approche territoriale du niveau européen jusqu'au plan local, et une participation de la politique de cohésion en appui aux projets de développement rural dans les nouveaux Etats membres et dans les territoires à handicaps structurels est en particulier essentielle.

La mise en œuvre proposée par R.E.D. s'articule autour de 3 axes :

3. AXE 1 - DÉVELOPPEMENT RURAL TERRITORIAL

Objectif : soutenir l'élaboration et la mise en oeuvre de projets intégrés de développement durable des pôles ruraux.

Adossés à la démarche de « Leader » et aux politiques de développement local participatif, les projets privilégieront une démarche multi-acteurs inscrites dans des projets (ou chartes territoriales) de développement, élaborés à l'initiative des collectivités locales et appuyés par des Groupes locaux, sur base d'orientations générales formulées par les Etats ou les Régions en conformité avec les orientations de l'Union européenne.

L'approche territoriale en est une condition sine qua non; l'agriculture et la forêt en sont les activités structurantes, et l'environnement et le paysage les fondements. La **gestion des espaces naturels** (gestion stricte ou spécifique, usage énergétique alternatif,..), pour peu qu'elle s'inscrive dans le cadre de démarches intégrées de développement, est partie intégrante de cet axe 1.

Le soutien financier aux projets devrait être matérialisé à travers des contrats d'objectifs négociés au niveau des collectivités locales, la programmation se faisant à l'échelle de « pays », de bassins de vie,..

Mise en œuvre :

Les éléments méthodologiques et les orientations de base en sont les suivants :

- des territoires de projet construits sur une ambition politique commune et sur une communauté d'intérêts économiques et sociaux, et qui se traduisent dans des projets intégrés de développement durable à l'intérieur desquels les mesures d'accompagnement et le soutien aux projets des divers acteurs s'inscrivent dans le cadre d'une programmation pluriannuelle.
- un principe de développement durable à l'intérieur duquel les opérations territorialisées en faveur de l'environnement et du paysage (Natura 2000,..) s'inscrivent.
- un développement participatif et intégré, fondé sur un diagnostic partagé et une réflexion interdisciplinaire conduisant à une représentation commune de l'avenir d'un territoire.
- une mise en œuvre collective et un partenariat local reposant sur des modes originaux de coopération entre institutions publiques et privées au sein d'une dynamique collective.
- la coopération entre territoires ruraux et entre territoires ruraux et urbains, et le travail en réseau afin de développer les compétences, dans un processus de formation continue.
- un cadre d'évaluation, pour permettre l'efficacité et l'efficience des projets de développement territoriaux et leur durabilité.

Le soutien à l'innovation, à l'ingénierie, à la formation et aux échanges est le complément indispensable à ces démarches.

Axe 2 - Soutien et adaptation pour les exploitations agricoles et forestières aux enjeux du développement territorial

Objectifs :

- accompagner l’adaptation des agriculteurs et des exploitants forestiers aux exigences du développement durable intégré et aux évolutions des territoires ruraux et des nouvelles relations ville-campagne;
- favoriser l’inscription des exploitations agricoles et forestières dans le développement de pôles de compétence et dans des chaînes multi-acteurs de développement.

Mesures :

- mesures liées à la formation des exploitants agricoles et forestiers ou à leur accompagnement social, à la transmission, à la création ou à la diversification d’entreprises agricoles et forestières inscrites dans des démarches territoriales de développement.
- soutien à la viabilité et à la rentabilité des exploitations agricoles et forestières par leur inscription dans des pôles de compétence et par le soutien à l’innovation, à la création et à la distribution de produits de qualité.

4. AXE 3 - SOUTIEN A LA FORMATION, A L’INGENIERIE ET AUX ECHANGES DE SAVOIRS

Objectifs :

- création et de renforcement de réseaux d’échange de savoirs entre les régions rurales;
- renforcement de la participation citoyenne par des modes de gouvernance ascendante;
- développement de la capacité d’initiative des institutions locales.

Mesures proposées à l’attention de l’ensemble des acteurs des territoires ruraux :

- un observatoire des territoires ruraux, en charge de mission d’information, de capitalisation, d’évaluation et de proposition;
- des mesures de soutien aux dispositifs de formation (développement de formations - appui aux établissements de formation);
- des actions en faveur des réseaux (échanges de savoir-faire, coopération horizontale, transnationale et interrégionale, dialogue entre territoires, institutions européennes et Etats membres) ;

- des actions thématiques sur des thèmes insuffisamment explorés dans une démarche proactive ;
- des actions de soutien à l'ingénierie du développement rural, à la formation-développement et à la recherche-développement.

Alors que la politique de développement rural actuelle a montré ses limites en matière de dynamisation effective et globale des zones rurales, le statu quo, fût-il amélioré, ne saurait être encouragé et pourrait même à terme affaiblir le positionnement des territoires ruraux et de l'agriculture dans la société européenne.

*Document d'étape
14 juin 2004*

European Landowners Organisation

Response to EXTENDED IMPACT ASSESSMENT: RURAL DEVELOPMENT POLICY
POST 2006, PARTS 1-3.

General remarks

1. The ELO is pleased to be consulted on this important subject. The member organisations of the ELO include, farmers, foresters, other land owners and land managers and managers of a wide range of rural businesses. Our core interest is a private sector based, sustainable, rural economy which provides: well-paid and rewarding jobs and livelihoods; maintains high standards of environmental management and environmental services for society at large; and thriving rural communities.
2. The Rural Development Regulation (RDR) provides the legislative basis for the Rural Development Programmes (RDPs) for each region, together with the measures in Pillar 1 of the Common Agricultural Policy these are the most important EU instruments to assist the achievement of this objective.
3. We recognise that the next phase of the RDR commences in January 2007 and it is necessary to prepare for this well in advance. We welcome therefore the Commission's 'think piece' about the broad approach to be taken in the next RDR. We recognise also that the timing of the process which involves (or should involve):
 - evaluation of the previous and current RDPs,
 - stakeholder consultation,
 - production of legislative proposals,
 - debate and agreement on these proposals, and then
 - the preparation of the next round of RDPs with the necessary regional consultation,and these procedures have to be completed by late 2006. We recognise too the political realities which require legislative proposals to be produced by the current Commission before the summer recess. However these timings have been known for years. We find it hard to overlook the haste with which the Extended Impact Assessment is being conducted. The options now on the table really should have been produced and aired at the Salzburg Conference. This would have given that conference some real meat, in addition to the 'simplification' proposals which all participants, predictably, readily agreed.
4. It is regrettable that the Commission's work plan has not resulted in a publicly available, thorough evaluation of the previous and current RDPs *before* the options for the next plan were produced. The fact that the synthesis of the Mid Term

Reviews of the Agenda 2000 is not planned to be published until just days before the legislative proposals are published, and after the proposals for options for the next structure, is not a good model. In addition, to allow only two weeks for Stakeholder consultation on a key policy issue falls way below acceptable good practice for public consultation. This poor performance in policy management cannot be overlooked in appraising the options put forward in this document. However understanding we are of the pressures on Commission services in conducting this complex and difficult work, we have to consider this a factor in assessing the options for the next round. It would be foolish not to. What grounds are there to assume that future capacity to evaluate and consult in a timely fashion will be any better, especially in the enlarged Union?

5. We would have liked to have seen the Commission's view of the next stage of evolution of the CAP post-payment decoupling. This is an important part of the background which should guide decisions on the RDR. Following the momentous decision to decouple the Pillar 1 direct payments from agricultural production, is there an intention to gradually integrate the two pillars? What are the mechanisms to achieve this? What timetable is envisaged in this process? We understand that until decoupling has been implemented and 'settled down' it is not easy to see through these questions. This is why we suggest that it will be necessary to build into the next RDR a Mid Term adjustment process to allow Rural Development Programmes to adapt to deal with the effects of decoupling. The ELO has its own views on these next steps which it would be happy to share with the Commission.
6. A final general point; our members from around the EU – old and new members alike – all point to the need for **simplified eligibility conditions** for Rural Development schemes. This really must be a high level objective for the next round of the RDR.

ELO choice between the three options

7. The presentation of the three options is very uneven. There is considerably more detail given for options I and II, with practically no real indication of how option III would operate. For this reason alone *the ELO finds it impossible to support the third option of a more territorial approach*. As a matter of principle, the ELO accepts that the major goals for Rural Development Policy, especially in a 'decoupled world' have less of a sectoral focus on agricultural production *per se*. However it is the case that in Europe agriculture and forestry are the two major land uses which directly or indirectly will deliver a very large part of total environmental land management. In turn this influences significantly the progress of Rural Development. In addition we are nervous of devising strategy on the basis of broad indicator statistics such as GDP per capita over very large non-homogeneous regions in which deprived rural areas are masked by the presence of wealthier rural regions and their embedded towns.
8. *As between Options I and II the ELO can see merits in elements of both as they have been set out in this paper. But both options contain aspects we do not*

support. Our instincts are more towards option I because Option II sounds more prescriptive than a regionally based policy should be. The descriptions of both options take the appearance of a sketch rather than a completed picture. It is difficult to know what significance to attach to the mentioning of a certain aspect in one option and not in the other. We will flag the aspects of both options which we support in the hope that what emerges is a blend of the desirable features of both. After two further general remarks, the remainder of this response takes the form of an answer to the implied questions raised by what has been discussed for each option.

9. *The ELO supports the ‘Salzburg’ notion underlying all the options offered, that is, the simplification of the current complex financing and administration into a single fund, with a single programming approach and a single set of rules.* We note that these simplifications are largely invisible to individual beneficiaries of the RDR, and there still remains the important task in each region of simplifying access to the RDR on the ground.
10. As the ELO wants the next RDR to have a wider remit, and to be more explicitly integrated with Pillar 1, this diminishes our support for Option I as it stands. *The “Improvements” on the status quo in Option I seem to be limited* to the Salzburg simplifications and not much more. We definitely want to widen the scope of actions, and to include some positive features suggested for Option II. However, we are cautious about two key aspects of Option II “The more Strategic Approach”.
 - a. First, *in principle, Rural Development is correctly seen as a regionally differentiated process.* The problems and needs of Europe’s rural areas differ enormously, the static features of the regions differ (that is their geography, climate, sectoral mix, economic, environmental and social performance, infrastructure and services), and they are at very different stages of development. These differences have been widened by the latest enlargement. This must mean that the balance of measures selected as appropriate to each region is also bound to differ enormously. This in principle makes us extremely nervous at the concept of deciding an EU strategy, with EU priorities, and EU core indicators to judge these priorities – all of which have to be translated into every Member State and every region with ‘quantified objectives and core result indicators’. Our instincts are that this would over-constrain the ability of Regions to do what they think is best for their own rural development. It would lead to artificial thresholds – that every Member State and region had to spend x% of its RDR budget on Axis Y. Even with broadly defined axes we are unconvinced that this serves a useful purpose. *Quite simply Option II seems too ‘top down’*, whereas Rural Development policy is supposed to be bottom up. The very existence of the policy and the elements it contains is the EU strategy, to try and define priorities within this for each region is dangerous.
 - b. Second, we return to the question of *capacity for policy management.* We have no evidence to suggest that the Commission is better at prioritising and

effective policy management at EU level than the Member States and Regions are at their level. Setting the priorities, quantified objectives, and indicators at EU level will turn out to either be a practical impossibility if done at the right level of detail, or it risks being meaninglessly general if set at a broad level for which comparable data exist for every region. The experience of the last decade is that assembling the wealth of detail of RDPs at EU level and distilling this down to meaningful lessons and useful steers for the policy has failed. It has certainly failed for the Mid Term Review of the RDR (for the EU of 15!). As the Commission has been unable to produce a synthesis of this experience in time for debate on the next round of changes given 4 years notice, it is implausible to suggest there can be a meaningful, annual 'EU-level report on progress in achieving priorities'. *Therefore we have serious doubts that the EU can or should have as detailed control on Rural Development Policy as Option II seems to suggest.* Monitoring and evaluation are vital for good policy; it may be done unevenly, or not at all in some regions, but this is not a good enough reason to abandon the decentralised approach. Co-financing is the main discipline to ensure the Member States interest in not wasting public money.

Specific questions arising from Options I and II (following the order in the paper)

Option I

11. **Current menu of measures.** The ELO agrees that all the existing measures should continue to be available in the new RDR, but we also have requested that the menu of measures **should be extended** to incorporate explicitly a range of new environmental services including for example: carbon sequestration in soils and forest, dirty water filtration, floodplain management, land management in the urban fringe, afforestation in upper reaches of river basins for better water absorption and less run-off. We have previously communicated a note on this and, for convenience, append it with this paper. This point should apply whichever framework option is selected.
12. **Ex-ante evaluation, SWOT analysis, and extensive stakeholder evaluation, are all desirable steps** to take before defining a new RDP. However we note that none was fully carried out before the Agenda 2000 RDPs were rolled out, and at the EU level the Commission itself has failed to undertake any of these before proposing this paper. This undermines confidence in these good intentions.
13. The ELO agrees that **Agri-Environment Schemes should be a compulsory part of all RDPs.** This applies now, it should apply whichever framework option is selected.
14. **The ELO agrees that a LEADER type measure should be part of all RDPs,** but we are reluctant to cite a specific percentage of expenditures. We support the notion that LEADER measures can be used to implement Axis 3, rural development, measures, but should not be confined to this.

15. We are unconvinced that the only change in delimitation criteria for the zones **Less Favoured Areas** should relate to risks of land abandonment. There is simply too little explanation of what is proposed to offer comment. The whole concept of areas subject to ‘natural handicap’ and ‘less favoured’ for agricultural production needs some explaining in the context of a policy in which support payments have been decoupled from agricultural production. Longer term, the whole concept of LFAs will have to be looked at again in a comprehensive way in which instead of talking about their ‘handicaps for agricultural production’, we talk instead about their virtues as areas of semi-natural ecosystems and landscapes which society treasures and wishes to maintain. This would focus on their environmental strengths instead of their production weaknesses, and maintaining social structures to ensure their sustainability is then a legitimate aspect to be considered. However such a broad review of LFAs may be beyond the timetable of the current exercise.
16. The ELO believes that **it is a bad idea to continue with two concepts, one called Good Farming Practice (GFP) which relate to Pillar 2, agri-environment schemes and LFAs, and another called Cross Compliance (which includes keeping land in Good Agricultural and Environmental Condition, GAEC) for the Pillar 1 Single Farm Payments.** This is hopelessly confusing to farmers, as often the same land with the same land management will be receiving payments from both types of scheme. There can, and should, be only one baseline, reference level for the receipt of public payments – this is clearly now the Cross Compliance requirements which the Member States are in the process of defining. The standards to be achieved in all other environmental schemes are, by definition, higher up the ‘pyramid’ involving a smaller part of the total area, and delivering higher, more costly to deliver, requirements. It is confusing to call these ‘Good Farming Practice’. At the very least, this single baseline is the model to which we should be striving. This answer should apply whether Option I or Option II is pursued.
17. **Evaluation and Mid Term Review.** It is undeniable that publicly supported programmes should have success indicators and built-in monitoring and evaluation procedures. In addition, for the special circumstances surrounding the implementation of the next RDR it will be essential to allow for review and adjustment of regional RDPs in a few years time, and certainly well before the end of the seven-year programme. This is to take on board an assessment of the effects of the 2003 CAP reform. No one can be certain about the economic, environmental and social impacts of the changes brought about by decoupling Pillar 1 supports. The process of decoupling will take several years to show through partly because some Member States are not even starting it until 2006 or 2007, some are only partially decoupling, and others are introducing phased switches in the basis of the payments. Likewise the direct payments in the new Member States only slowly build up. All this suggests that it is vital that Member States have scope to adjust the balance and makeup of their RDPs in the light of the first few years’ experience of CAP reform/introduction of the CAP. The new regulation should explicitly allow for this readjustment process – with due evaluation and consultation, of course.

18. **Observatory.** It is incumbent on the Commission to demonstrate that the previous experience with Observatories provides a worthwhile example to follow. It is vital that such observatories include a strong representation from organisations representing the actors on the ground – that is the land managers and rural businesses. An observatory should not be primarily for the benefit of administrators and researchers, though these organisation have an important input.
19. **The ELO supports the distribution of the totality of RDR resources for the next round between MS on the basis of objective criteria.** We assume this means the whole quantum of resource starting in 2007, not just any increment compared to the present allocation. Of course there will have to be serious discussion, even after Commission proposals are made, of the criteria and their weighting which should reflect the demand for the measures offered by the RDR in each region.

Option II

20. **Too many measures?** Rural Development, especially as it includes agri-environment, is a complex process. It is of no surprise to the ELO that this requires a large toolbag of measures and that they will be used in different combinations in different regions. As, for practical reasons, most Member States have rather few and thus quite large regions, these regions will sometimes be fairly heterogeneous. There is no suggestion (even in the Commission’s paper) to reduce the range of measures available. Thus it is surprising to read that the Commission believes that “many programmes ...tend to be a collection of (too many) measures ...” . Devolving policy to the regions means trusting the regions to make decision in their own best interests.
21. **Strategy starting at the EU level?** It is undoubtedly a good thing that the Commission should conduct strategic analyses, and have strategic ideas for Rural Development looking across the EU as a whole. This is correctly part of its role. Our concern is how far this is translated formally into strategies which then have to be followed by each Member State and each Region. We have already indicated our concern that EU level indicators are likely to be too broad to pinpoint real problems or progress. Broad rural regions in many parts of Europe are often highly successful, yet they contain pockets of deep deprivation and difficulty. This will rarely show up in broad, pan-EU statistics. Thus we are unconvinced by the case for the ‘more strategic approach’ as explained here.
22. The point about Member states and regions setting their **strategic objectives with result indicators and monitoring and evaluation procedures** should apply which ever framework option is used.
23. **Minimum levels for the three axes?** If the problems are not ‘balanced’ between regions then the mix of solutions will reflect this. It is folly to pre-determine the balance of expenditures without reference to objective indicators of the balance of problems. We can see the virtue in insisting that all regions pay *some* attention to measures in all three axes, but the suggested figure of 20% is far too high. It

precludes any regions spending more than 60% on any one axis. Yet many Member States, are already doing this and with good reason. We argue they should be allowed to continue, to devote more than 60% of their resources to the Environmental axis.

24. **Business size thresholds?** Under Axis 1, competitiveness, we support the descriptions of the measures and their purposes. We also, broadly, support the desire to focus resources on micro and small enterprises. (It is important to clarify the definitions of these concepts). However we would be opposed to the use of rigid thresholds of size of enterprise which can be assisted. There may be medium sized, or even large, enterprises which serve the interests of many micro producers who would collectively benefit from assistance under this axis. Indeed it is the express policy in many farming regions to encourage producer groups and farmer controlled businesses to develop. The important criterion is to assist rural development, whatever the entry point for the aid measures. Similar comments also apply to the suggestion that it is only micro-enterprises who will be eligible for processing and marketing aids in the forestry sector. This seems unnecessarily restrictive.
25. **Axis 2: land management/environment.** The ELO accepts the broad categorisations listed. We stress that it is important to include both narrowly defined (e.g. on certain Natura sites) as well as much broader application schemes to maintain and enhance environmental values. It is also vital to specify, as the paper does that the whole programme area should in principle be covered.
26. **Payment principles for agri-environment services.** We stress that the proper measure of income forgone for any resources used in delivering public environmental services is the income which could be earned in the best alternative opportunity. If this is not done then there can be no surprise if there are insufficient offers to deliver such services. In other words, positive payments will be needed to deliver the level of environmental services planned by Member States and regions.
27. **Resources for Natura 2000.** We note, and support, that there is strong reference to assisting areas of particular environmental relevance (under Natura 2000), but we also note that the resources to fund this assistance have not been identified. Without these resources, the goals of achieving N2K sites in favourable condition will simply not be achieved.
28. **Climate Change.** The ELO appreciates the references to protection against erosion, fire and flooding. However we urge that more attention is explicitly focussed on climate change and actions land managers and owners can play in this with respect to carbon sequestration in soil and forest. It is vital to establish this explicitly as a component of the RDR for the period 2007 – 2013. This will be an important make or break period for achieving Kyoto goals. This is an important heading in its own right and deserves a separate chapter heading in the new regulation for the demonstration value this would bring. It is for the Commission to decide if energy substitution is covered in a climate change ‘chapter’ or under another heading, but it should be part of the Axis 2 ‘strategy’. It is in creating these strategic opportunities that the Commission defines its Rural Development

Strategy, rather than being over-prescriptive about which regions pick up which measures.

29. **Axis 3 wider rural development.** We have no comments beyond the fact that ‘and forestry’ should be added to the first bullet point after ‘agriculture’ under the building blocks for diversification.
30. **Role for LEADER.** We support this but why stress only axis 3? This approach should be ‘integrated’ ie explicitly involving economic, environmental and social actions.
31. **Simplified Eligibility conditions.** This is strongly endorsed. The most frequent comment we receive from individual members about the RDR is the complexity of the application process.
32. **Monitoring and evaluation.** The idea that these procedures can be done across the EU-25 on an annual basis is not credible. Neither is it a good use of scarce administrative resources. It takes time to set up RDPs and more time to get a flow of applications. Many of the outcomes we are seeking to achieve are the result of complex processes involving the interaction of these controlled policy inputs plus many other natural and economic factors. It is pointless in watching short term changes in indicator values. It is the medium and longer term trends we are wishing to influence. We must therefore set plausible, practicable targets for the frequency of monitoring and evaluation – otherwise we risk bringing the whole process into disrepute. The example of publishing the strategic options for the 2007-13 RDR before the publication of the review of the current arrangements is a classic case of this problem.
33. **Rural Development Observatory?** The ELO support this provided it has a balanced input from organisations representing the real actors of rural development on the ground.

9th June 2004

European Landowners Organisation

Rue de Trèves, Brussels, B-1040, Belgium

Extended Impact Assessment: Rural Development Policy post 2006

An initial response from the European Forum on Nature Conservation & Pastoralism

This paper has been written in the light both of the Commission document and discussions at the Agriculture & Environment Advisory Group convened on the 8th of June, 2004.

General comments

EFNCP very much welcomes the opportunity to comment on this document and finds much within it which is thought-provoking and positive. We hope that we can contribute in a constructive way to the debate it has stimulated.

We do however echo a number of the concerns expressed already by other stakeholders concerning both the lack of transparency of process and the very short time scale for response. In our case we are an NGO without permanent staff whose strengths lie in our ability to feed in grassroots experience as farmers, advisors, ecologists, etc.. Other organisations may have Brussels-based staff, but it must be the case even then that the 'value added' from the consultation surely derives from their ability to discuss and feed in knowledge from their colleagues and members on the ground.

Assumptions and realities

EFNCP believes that the document could and should present a fuller picture of the imperatives and constraints which underpin it. Three of these were stressed by almost all speakers, from whatever group of stakeholders, at the Advisory Group:

- 1) Commitments undertaken. The MS are bound by certain legal undertakings in the first instance and by other quantified undertakings (such as the 2010 aim for biodiversity) in the second. It is clear that to some extent these underpin the greater focusing envisaged in Option 2, but nowhere are they set out fully. Our view is that such an analysis would show that most of the Community's commitments have been environmental (land management) orientated rather than social or economic.
- 2) Financial constraints. It was striking in the Advisory Group that all the various groups felt that this was *the* major factor in RD decision-making in the next programming period and that it should have been a fundamental starting point for the EIA. Each also had thought about the implications of this and many of the conclusions were similar (focus on

agricultural management, for example). Subtle but significant differences of view do however remain and the Commission missed an opportunity to discuss these further and to move the debate on a step.

- 3) The Commission's 'agenda'. It was very frustrating to hear from all sides comments which drew on their impressions of what the Commission is really 'up to' and rumours circulating in Brussels. If the 'real story' is only available in private conversations with anonymous officials, this devalues the consultation process. But it also misses an opportunity for open discussion on what all would admit are difficult choices.

Needs analysis

To these we would add a further point, one touched upon by BirdLife in the Advisory Group and one which flows from the first two issues. An extended impact report of this type should be focused around a Needs Analysis. The Commission must set out clearly what the implications of its commitments are in terms of actions required and their potential cost. It must show what the priorities are if the finances are tight.

We believe for example that there is a clear case for arguing that legal requirements should take precedent. Next should come quantified Community targets such as the BAP 2010 objective. Last should come general Community aims. Addressing urgent or acute issues should take priority over dealing with chronic problems. By the same token, reversal of ongoing damage comes before the maintaining of existing public goods benefits and that in turn comes before actions to promote enhancement of public goods delivery.

We therefore feel that there should be greater discussion in the document of the roles of cross-compliance, short-term or one-off assistance and ongoing annual payments. We believe in the 'polluter pays' principle, but we feel that pragmatism needs to inform the RD process particularly where vulnerable businesses are already delivering public goods.

Thus on the biodiversity side of things, the priorities should be:

- 1) Prevention of ongoing damage of sites under Community protection (perhaps using mainly cross-compliance)
- 2) Prevention of ongoing damage to biodiversity outwith these sites in line with 2010 target (perhaps using mainly cross-compliance)
- 3) Maintenance of sites with Community protection
- 4) Maintenance of biodiversity outwith these sites in line with the 2010 target
- 5) Enhancement of sites with Community protection
- 6) Enhancement of biodiversity outwith these sites.

On the question of State Aids we feel that subsidiarity should allow for flexibility at the MS level while still ensuring that Community co-funded RD actions are aimed squarely at the Community's aims and objectives. Thus the RD framework should allow for other priorities which do not help to achieve the EU's main objectives, but are not in conflict with them to be funded as State Aids. Measures such as Early Retirement, which have little or no positive effect on sustainable land management in its full sense, might be an example.

The aims of rural development

EFNCP believes that the aim of rural development should be to support the provision of public goods by agriculture and forestry where they cannot or should not be achieved by the free market and the first pillar support framework.

We accept fully that not all of these public goods concern biodiversity, or even the environment. We feel however that the time may have come when 'increasing competitiveness' should no longer

be a stand-alone end in itself. On the other hand, where other public goods are involved, there is a strong case for saying that this is not something that should be left to the free market.

We feel also that in times of financial constraints, and given the existence of large and targeted Structural Funds, the call of wider rural communities on the funds should be limited, again where there is no link to the delivery of public goods by agriculture and forestry.

We agree therefore with the view expressed by many farming organisations that the emphasis should be on sustainable land management. In line with the Malahide message, we also think that sustainability needs in *all* cases to include economic, social and environmental considerations.

Thus we foresee an end to RDPs focussing on investment in holdings or installation aids for young farmers which are not directly relevant to the environmental sustainability of land use and the delivery of public goods which the market can't supply. We also see an end to the rather distant relationship between afforestation measures and wider RD aims in many MS - afforestation of farmland will from now on have to lead to clear public goods gains compared to the existing land use. Employment arguments cannot be used to access Community funds, while State Aids would have to be compatible with Community aims and objectives.

EFNCP is of course mainly focussed on HNV farmland. However, we accept the point made strongly by botanists, for example, that to achieve the 2010 target biodiversity should first and foremost be *maintained* both in High and Low Nature Value farmland. Our experience is that marginal farming is always under-resourced, but that does not blind us to the need to have carefully targeted funds applied to more intensively farmed areas to maintain small patches of high biodiversity. In our view, the distinction between HNV and other farmland is not in the aims we should work towards, but rather in the most appropriate mix of measures for the achievement of those aims.

We think therefore that, given the financial constraints, a realistic aim for RD policy in the short term would be:

‘to support the achievement of sustainable land management by agriculture and forestry where that cannot or should not be achieved by the free market and first pillar support framework.’

Sustainable land management is expressed first and foremost in the Community's legal and other quantified commitments. Where a choice has to be made, maintenance of beneficial features should take the priority over enhancement.

The 3 axes

This leads us to the 3 axes. EFNCP fully agrees that RD can be thought of as having 3 aspects and that all are important. We however disagree strongly that in the new policy context these are fundamental divisions of rural development or that they should reflect 3 separate aims. We very much deprecate the subsequent organisation of much of the document around this split.

A particularly regrettable aspect of the slavish adherence to the 3 axes has allowed the Commission to avoid tackling up to now a long-standing fundamental problem with RD policy – the difficulty in integrating axes 1 with axes 2 and 3. We believe that the proposed aim we outline would allow the infusion of a degree of coherence into RD policy which has hitherto been absent.

It is important to stress that EFNCP's view that sustainable land management should be at the heart of policy in the next period does *not* mean focussing exclusively on agri-environment. On the contrary, while agri-environment has its place, so also (and particularly so in marginal areas) do LFA support, investment in holdings, marketing assistance etc..

We do not, for example, agree with the implication in Option 2 (one stated more clearly in meetings by officials) that a possible approach is to use targeted, tightly-focussed, 'deep and narrow' measures in limited HNV zones and 'broad and shallow' measures (if that) elsewhere.

Our view of how an integrated policy might work is the exact opposite – in HNV areas the emphasis is firstly on broad and shallow maintenance measures backed up by a wide range of other biodiversity-appropriate measures (such as investments in holdings or marketing assistance or aid for reaching standards). Deep and narrow measures are used mainly for enhancement. On the other hand in areas of overall low biodiversity, deep and narrow measures are needed for the maintenance of what biodiversity is left, while a combination of broad and shallow and deep and narrow can be used for enhancement.

We have no 'sacred cows' not only because we believe that if anything is sacred it should be the *aims* of policy, but also because we believe that the use of agri-environment flows naturally from the objectives towards which we believe policy should work.

Similarly, since we believe that policy should be integrated in pursuit of a single coherent aim and that in any case it is false to think of the various measures as complementing only 1 of 3 separate RD axes, we very much disagree with the Commission's *dirigiste* suggestion of minimum percentage spend on the various measures.

The RD measures

We agree with the Commission that the 'tool box' is much better now than it ever has been and that it probably contains most of the measures that might be needed in the future. Sometimes the right tools are available but are used inappropriately - using a screwdriver to do a chisel's work, to quote Steve Goss. However, it is rather disappointing that the Commission has not taken time to explore possible alternative or complementary approaches in some areas.

We feel that some of the basic underlying concepts of the current RDR seem somewhat divorced from the needs on the ground. The at-times nonsensical calculations underlying agri-environment payment rates is a case in point. The time has come to re-evaluate seriously agri-environment's focus on income foregone and additional costs and to look at paying for goods received. This might yet involve looking at benefits foregone and additional burdens, but this time in the context of the aspirations of rural people and social trends, taking into account alternative opportunities both within their communities and in the distant but attractive cities.

Recent discussions both in the Agriculture & Environment Advisory Committee/Group and on the ad hoc Working Group on the BAP have in particular focussed on the management of recently abandoned land, especially in the EU-10 (CEEC) states. The ambiguity regarding how First Pillar payments might or might not be used to support a resumption of agriculture on such land makes addressing the issue in any comprehensive RD paper more urgent. Suggestions of an 'LFA+'

measure which can include an element of incentive (à la Agri-environment) deserve further consideration. The Austrian Government has pointed out the benefits of a similar approach in the case of Article 16 payments.

Turning to the LFA measure itself, we sympathise with the Commission in its dilemma on how to reform this measure. We agree with the Commission that there is a substantial overlap between HNV farmland and the present LFA. We can however see reasons why there might be non-HNV LFA (small islands are an example). We are also alive to the fears of farmers that the ethos of the LFA measure will be diluted by the attachment of more and more conditions.

Our view is that natural disadvantage is likely to lead to a greater retention of natural features, wildlife etc as natural by-products or adjuncts of the farming system. It is therefore not unreasonable to support farming systems *per se* as part of the overall objective of maintaining sustainable land management. This is NOT the same as saying that farming *per se* is not necessarily good for the environment. We believe that it is not unreasonable to limit support to those farming systems which *do* reflect the natural disadvantage and deliver extra public goods in the process. We believe that to do so would massively improve the LFA measure without withdrawing support from the vast majority of current recipients.

From one perspective, this is mainly a change of mindset, albeit a significant one. Thus, while the boundaries of LFAs themselves should therefore be drawn with HNV farmland in mind, we do not anticipate this in itself creating many difficulties. On the other hand, the allocation of LFA *aid* would involve real changes - the more intensive systems (those using irrigation or exceeding a certain stocking density, for example) would not be eligible, no matter where they are located.

Lastly, the Commission might consider allowing the LEADER type approach to be used in the design etc. of agri-environment schemes. Where it has been used in the past it has been quite successful and it brings the benefit of immediate local ownership if done properly.

Miscellaneous issues

We agree with other commentators on the signals given by such an apparent rapid change of heart on co-funding rates for RD.

On GFP/cross-compliance, we agree with the unstated aim of the Commission under Option 2 to create a single common standard. We agree that there should be a more detailed examination of the issue and a transition period for achieving the application of the new standard. However, it is unacceptable that farmers who go beyond minimum standards which are acceptable to the Commission have to cross a further higher threshold before being eligible for RD payments – a ‘gap’ which by implication they have to fund themselves.

On the division of responsibilities, we feel that the Commission’s role should be much as outlined in Option 2: to set clear priorities linked to targets set down in law and in Community accords and then to assess with some rigour the RDPs submitted by MS in pursuit of those objectives (and of other non-conflicting objectives in the case of State Aids). We feel that the time when MS can apply almost any mix of measures purporting to support broad but often conflicting objectives set by the Commission has to be over – the challenges recognised by both Commission and MS are too great and the financial resources available to meet them are too small.

Summary

In summary, we very much commend the Commission for starting this debate. We call on them both to engage more fully in it by setting out clearly the constraints under which all of us are working, whether in terms of aims or of finance. We call on them also to facilitate the contribution of civil society to the debate to a much greater extent than has happened thus far.

We call for the Commission to recognise that all RD under the CAP should work towards a *single* goal:

‘to support the achievement of sustainable land management by agriculture and forestry where that cannot or should not be achieved by the free market and first pillar support framework.’

Sustainable land management is expressed first and foremost in the Community’s legal and other quantified commitments. Where a choice has to be made, maintenance of beneficial features should take the priority over enhancement.

We believe that *all* RD measures should work towards that aim and that on HNV farmland and LFAs the challenge is to move away from reliance on single instruments towards a package of complementary measures which will have both social and economic aspects. With the exception of the LFA options, all RD measures should be available in principle throughout the territory. LFA measures should be retargeted at HNV systems, defined broadly but using clear environmental criteria.

There should be no Community co-funding of any measures which do not directly contribute to this single aim.

We feel that any move towards greater subsidiarity in the adoption of measures tailored to local needs has to be accompanied by a stronger role for the Commission and Council in setting overall Community goals towards which RDPs must work, in assessing RDPs to ensure that the mix and content of co-funded measures works coherently toward this goal and that any State Aids are not in conflict with Community aims.

Gwyn Jones
EFNCP
11/6/04

European Commission
Agriculture Directorate General
Directorate F.
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Att.: Director Nikifos Savenas

Re.: European Commission: Extended impact assessment on Rural Development policy post 2006

Danish Agriculture hereby forwards comments as asked at the advisory committee meeting on 25th of May.

Danish Agriculture is satisfied that the Commission in its assessment for the Rural Development (RD) policy past 2006 pays attention to the demands of simplifying the different regulations as well as the RD financial programmes to make them easier to meet as stated in the conclusions at the Salzburg conference 2003. We do underline that the need for such a simplification is present for both authorities as well as for applicants.

The Commission has formulated three strategic objectives for the future RD policy that Danish Agriculture agrees upon:

- Increasing the competitiveness of the agricultural sector through support for restructuring;
- Enhancing the environment and countryside through support for land management (including actions related to Nature 2000 sites)
- Enhancing the quality of life in rural areas and promoting diversification of economic activities through measures targeting the farm sector and other rural actors.

These are objectives in line with our national priorities;

- Growth and innovation
- Nature and environment

Danish Agriculture agrees with the fact that agriculture still has a central and important role to play in the economic and social development in the rural districts, as well as in

preserving and improving the values of nature and thereby enhancing the quality of life in the rural areas. At the same time we find reasons to clarify and stress the importance of letting innovation, advisory services, and knowledge dissemination contribute to improve the competitiveness of the agricultural sector.

At the same time we emphasise the need of letting the environmental actions related to the implementation of the EU Water Framework Directive achieve the same right to be included under the second objective as Nature 2000. Finally we find reasons to mention the non-food segment as a very promising activity in the future rural development.

The Commission has pointed out three models in order to achieve the objectives;

- Improved status Quo (option 1)
- A more strategic approach (option 2)
- A more territorial approach (option 3)

Danish Agriculture finds it is most appropriate to pursue the already working and well functioning rural programmes and thereby secure continuity. This is in particular important looking at the environmental programmes such as the Agri Environment programme. Right now, this programme turns out to be increasingly popular for applicants who want to change into more environment friendly agriculture.

We do at the same time find it important that the Member States are given possibilities to create an economically and environmentally sustainable policy on rural development. Due to these considerations we find that the choice should be between option 1 and 2.

As for option 3 we find that by concentrating all RD efforts on territorial targets in poorer and disfavoured rural areas there could be a risk to stop a positive development in those less disfavoured rural districts that have better chances to avoid further depopulation, unemployment etc.

Danish Agriculture has the following comments to Options 1 and 2:

Option 1:

While LEADER+ so forth has been an independent programme without direct connection to the RD programme it is now suggested that LEADER+ under Option 1 should be integrated in the future RD programme. Furthermore it should be given at least 4 pct. of the planned programme expenditure. Though Danish Agriculture finds it positive that the programmes are given a better coherency and priority, we find it unnecessary to use obligatory limitations on these priorities.

Option 2:

An important difference between Options 1 and 2 seems among other things to be that the single measures will be gathered in “building blocks”. Under the formulated objective – “to increase competitiveness” e.g. there will be two blocks: One dealing with improvement of

the human resources and one dealing with provision and development of the physical capital.

As for the block on how to improve human resources, it is described how to meet the need for supportive advisory services that may assist in developing business plans that include investment, training needs, plans for restructuring the farm, need of new technologies, environmental technologies etc. Blocks of this kind would indeed provide a young farmer with very useful information on the development of his or her human resources. It should, however, be possible for the single recipient to choose the parts of the programme that suit his or her needs best.

Under the objective “environment and nature”, three kinds of support are pointed out. One aimed at compensating natural handicaps, one for Natura 2000 and one for the Agri-environmental programme. Agri-environment payments are suggested to be given to both farmers and other land owners to cover additional costs especially in ecologically vulnerable zones. Danish Agriculture recommends that implementation of the EU Water Framework Directive should be included in such areas of support. It is very important, that the support can be given to other activities than pr. hectare. It is important that development in technology can be supported.

Finally the objective “quality of life in the rural districts – the wider rural development”, is mentioned as a new area worthy of support. This could be done by supporting small non-farm-enterprises in order to encourage and promote new activities and links between the rural actors. In connection with the priority for small entrepreneurs, Danish Agriculture asks that it should be taken into consideration that the ability to establish and initiate employment and economic sustainable activities in the local rural district should be supported rather than focusing on size and ownership. The volume of the enterprises might be less important.

In Objective 2 it is suggested that at least 7 pct. of the programme cost should be used within LEADER+. To secure a balanced share between the three objectives, the Commission suggest that each objective should be provided with at least 20 pct.

It must be considered whether this suggestion gives the Member States too strong limitations in meeting quite different conditions for RD in the single MS. On the other side the limitation could also be seen as an insurance that none of the MS would be tempted to use too much of the programme cost to provide unbalanced competitiveness.

The extended impact assessment on Rural Development past 2006 is given with a number of annexes with tables and statistical data about the Member States. Danish Agriculture asks that this material is studied thoroughly to assure quality and to avoid unjustified conclusions.

Conclusions

Rural areas in Europe vary widely in shape and form. They have different strengths and weaknesses and face different opportunities and risks.

Rural development might focus at:

- protecting the environment and natural resources
- ensuring innovation and competitiveness
- safeguarding and strengthening employment and income and
- ensuring the quality of life of the rural population

Rural development should therefore be:

- based on a regional strategy that is shaped and supported by the population and
- encompass all rural economy sectors in a cross-sectorial way as well as social, cultural and ecological requirements.

At European level, this approach should be implemented as comprehensively as possible in the coming programming period starting in 2007.

With regards

Heidi Alsing
Danish Agriculture

A new rural development strategy must strengthen agriculture in its transition to a sustainable and more market orientated entrepreneurship. It must be simple, functional with enough flexibility for the different regions (bottom up). We don't want a centralistic European strategy for our rural areas.

The assessment shows a move from a sectoral agricultural approach to a more integrated rural development policy. This means that agriculture is no longer the only goal of the CAP. Anything that contributes to the rural area: economy, ecology and social aspects can be included.

LTO acknowledges that rural development is more than agriculture alone. But LTO is of the opinion that these broader issues must not be a part of the CAP policy. For a broad approach the structural funds, as Leader, are the most appropriate tool.

There is a real danger in mixing the second pillar with non-agricultural targets. At the end there is no distinction between 2nd pillar and the structural funds. The 2nd pillar then loses its political basis. The broader approach should be a responsibility of the member states themselves and needs a bottom up approach. Structural funds can help local communities to take their responsibility.

LTO proposes to make a distinction between agri-related measures and the broad approach. The latter to be paid from other sources than CAP-money.


What is not clearly stated in the assessment is why there is a second pillar. It should be made clear that the 2nd pillar is meant to enhance competitiveness of European agriculture in general in the face of liberalisation of the world markets. Special emphasis is necessary to help agriculture to comply with the severe European environmental policies (which has a particular negative influence on our competitiveness).

In the assessment Natura 2000 is explicitly named as a possibility to finance. LTO does not agree with this. Realization of Natura 2000 does not help the competitiveness of agriculture. It is a different policy area, and should therefore be treated differently.

LTO wants cross compliance to be the baseline for all agri-land management payments. This means that Good agricultural practice is equal to cross compliance. This will harmonize and simplify European rules. By the way, local authorities and non-agricultural entrepreneurs do not have to comply with cross compliance.

N+2 is desired because the nature of the measures in stimulating agriculture that can take more than one year to fully materialize.

Rural development should not be restricted to certain areas. It should be able for all areas to use it as all areas have their own specific problems.



**CONSIDERACIONES DE ASAJA SOBRE LAS
DIFERENTES OPCIONES PROPUESTAS POR LA
COMISION SOBRE EL NUEVO PERIODO DE
PROGRAMACION PARA EL DESARROLLO
RURAL**

14 de junio de 2004

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En primer lugar valoramos positivamente el trabajo de la Comisión y la oportunidad que brinda a los diferentes actores implicados en el Desarrollo Rural, de cara a contribuir al nuevo periodo de programación .

Desde ASAJA , consideramos que además se trata de un periodo clave para el sector agrario europeo tras las reformas realizadas en el conjunto de la PAC, lo que conlleva un importante esfuerzo de acompañamiento estructural en los próximos años.

Antes de expresar nuestra valoración sobre las diferentes opciones planteadas por la Comisión, quisiéramos realizar algunas consideraciones sobre los tres grandes ejes u objetivos marcados para la próxima programación de desarrollo rural (competitividad, medioambiente y gestión territorial y desarrollo rural más amplio):

1. Sobre las Medidas de desarrollo rural vinculadas a la reestructuración-reconversión y la mejora de la competitividad en agricultura:

En general, las medidas actualmente destinadas a la reestructuración y mejora de las explotaciones han sido adecuadas , pues pueden abarcar dichos objetivos. Los problemas han derivado fundamentalmente de la falta de disponibilidad presupuestaria necesaria para llegar a las explotaciones demandantes de tal apoyo.

Los resultados del programa se traducen en avances, aunque lentos, en el relevo generacional, se modernizan explotaciones, se mejoran procesos de comercialización en base a programas de calidad,....

Lógicamente y como debe corresponder a un nuevo periodo de programación se deben mejorar aspectos , en base a la experiencia adquirida. Así, por ejemplo, en el caso del cese anticipado de la actividad, tan importante de cara al relevo generacional, debería realizarse un análisis de su impacto regional al existir importantes desequilibrios en su aplicación y la necesidad de combinar adecuadamente con la primera instalación de jóvenes.

La aplicación de los Fondos Estructurales en la UE, sin duda alguna es fundamental para el desarrollo de las zonas rurales, y es por ello que la política específica de estructuras agrarias debe acompañar adecuadamente (en contenido y presupuesto) a consolidar la Política Agraria Común, más aún de cara a consolidar las explotaciones agrarias tras la importante “reconversión” a la que se está viendo sometida tras las reformas de las diferentes OCM y tras ver congelado el presupuesto en su rubrica 1a para las nuevas perspectivas financieras (Cumbre de Bruselas).

Es fundamental una adecuada delimitación de las medidas destinadas a las Estructuras Agrarias, especialmente en estos momentos, en los que el “modelo agrícola” esta retomando una nueva forma a la que es necesario acompañar con una verdadera política estructural que permita la adaptación de las explotaciones agrarias a dicho “nuevo modelo”.

El apoyo debe ser de ayudas centralizadas y por tanto un “enfoque descendente”, ya que las acciones contempladas tienen ya un alto grado de concreción. Dicho enfoque descendente presenta una importante ventaja, la de no prestarse a arbitrariedad en las concesiones.

2. Sobre las Medidas de desarrollo rural vinculadas al medioambiente y a la gestión de las tierras

Las ayudas otorgadas a *zonas desfavorecidas* (LFA) están demostrando ser un complemento efectivo en el sentido de prevenir el abandono de las tierras, si bien su eficiencia se ve reducida por el escaso nivel de las primas, si tenemos en cuenta la complejidad de la actividad agraria en tales zonas.

El incremento de los incentivos financieros en cierto tipo de LFA deberían realizarse, en todo caso, con un carácter de “discriminación positiva” y nunca como resultado de la detracción de otros tipos de LFA en cada Estado Miembro.

Respecto a las *medidas agroambientales* es un ámbito de apoyo que va en ascenso y , aunque con escasos años de experiencia de aplicación frente a medidas como las de reestructuración y mejora de las explotaciones, se están consiguiendo buenos resultados en muchas líneas de apoyo y están permitiendo un cambio de mentalidad en el agricultor y ganadero.

Aunque existe todavía una importante labor en análisis de indicadores de eficiencia de cara a la medición de su impacto , los resultados de estas medidas están siendo importantes, sobre todo en lo que respecta a la optimización de recursos.

Consideramos que el apoyo no debe restringirse a determinadas zonas prioritarias, eliminando el apoyo al resto de zonas. El conjunto de las medidas agroambientales deben ser planteadas en todo momento con una perspectiva más amplia, o sea al conjunto del sector agrario, pues podríamos por ejemplo , no atender a mejoras agroambientales en ciertos cultivos mas intensivos por no encontrarse estos en zonas previamente catalogadas como prioritarias. Restringir la aplicación de estas medidas a ciertas zonas geográficas conllevaría a un indeseado desequilibrio en la aplicación de medidas mas respetuosas con el medio ambiente dentro de los diferentes mapas agrarios regionales.

La implementación de las estrategias medioambientales de la UE no consideramos que deban, por regla general, ser objeto de medidas concretas en este tipo de apoyo. Por contra, deben ser tenidas en cuenta de forma horizontal, en el conjunto de los programas agroambientales. No obstante, puede ser que a nivel nacional o regional, se considere oportuno cierta medida que si contribuya específicamente a la puesta en practica de cierta estrategia de la UE. Es este el caso de la agricultura orgánica o ecológica, que ya es apoyada específicamente a través de líneas agroambientales específicas.

En general, consideramos adecuado el mecanismo de concesión de ayudas agroambientales , al margen de mejoras concretas en cuanto a su agilización en los procedimientos de modificación de los programas ó una mayor flexibilidad en aspectos como el referente a la reducción del periodo de compromisos (actualmente quinquenales).

Consideramos que la reforestación de tierras agrarias de cualquier forma conlleva la consecución de objetivos amplios (biodiversidad, combatir el cambio climático, reducción del riesgo e impacto de los desastres naturales,..), en base a lo cual debe ser tenido en cuenta en la medida adecuada dentro del capitulo ambiental general, fundamentalmente en su aspecto presupuestario.

Por último, sobre el capitulo medioambiental debemos resaltar de forma especial que las medidas agroambientales no deben ser el instrumento utilizado para medidas que vayan más allá de lo agrario. Tal es el caso de las zonas Red Natura.

3. Medidas de desarrollo rural vinculadas a la economía y comunidad rural en un sentido más amplio

Estas medidas que podríamos catalogar como “rurales no agrarias” y cuya importancia es patente de cara a la diversificación de actividades y , por tanto, de rentas , han respondido de forma adecuada a “enfoque ascendente” (bottom up) al contemplar medidas sin un importante grado de concreción. Contrariamente, ocurre en las medidas estructurales agrarias o en las medidas de acompañamiento, que responden mas adecuadamente a un enfoque descendente.

La eficacia y eficiencia de las medidas “rurales no agrarias”, se ven reducidas al ser financiadas con un fondo agrario que ha dado lugar en muchas ocasiones a “fricciones indeseadas” con el contenido y gestión de las medidas puramente agrarias (por ejemplo , dudas sobre elegibilidad de sector agrario en iniciativa Leader o programas nacionales amparados en el art.33).

Así pues, estando claros los objetivos concretos de ambos tipos de medidas, lo mas practico de cara a búsqueda de mayor eficacia y eficiencia es que se concentren los esfuerzos de forma especifica y autónoma, evitando interferencias entre ambos.

Respecto al contenido del art.33 del Reglamento(CE) 1257/1999, consideramos que , en todo momento, se ha de tener en cuenta la no inclusión de medidas que, por su naturaleza de servicios básicos o infraestructuras, deben ser financiadas con cargo a otros capítulos presupuestarios.

Otras Consideraciones Generales:

A) Sobre la Simplificación y Administración de programa

Compartimos la necesidad de una simplificación, de cara a una mejor aplicación y gestión de los programas. No obstante, consideramos fundamental que, en todo caso, dicha simplificación se traslade a los diferentes niveles hasta llegar al beneficiario ya que, en muchas ocasiones, una mayor simplificación a nivel UE, se traduce en una mayor complejidad a nivel de beneficiario (agricultor).

Además, dicha simplificación no debe conllevar una total subsidiariedad hacia los Estados Miembros que pueda redundar en una aplicación desequilibrada en el conjunto de la UE, o renacionalización de las medidas (sirva como ejemplo para ambos casos, el desarrollo del Rgto

1782/2003, que tenía como uno de sus objetivos principales la Simplificación y que se está traduciendo, en la práctica, en una mayor complejidad para los agricultores y ganaderos, así como una heterogeneidad de modalidades de aplicación en los diferentes EEMM y/o Regiones).

En resumen, los nuevos avances en Simplificación, subsidiariedad y flexibilidad, sugeridos en las conclusiones de Salzburgo, deben ser tratados con la adecuada prudencia, de cara a no resultar, respectivamente, en mayores grados de complejidad para el beneficiario, renacionalización de las medidas y falta de armonización (pérdida de criterios comunes).

Consideramos que el contenido de los programas actuales quizás pueda reducirse en su aspecto “burocrático” (exigencias administrativas entre las diferentes estructuras gestoras). No obstante, *no consideramos adecuado, especialmente en las medidas estructurales agrarias y de acompañamiento, que se consiga ninguna mejora mediante la reducción del número de medidas.* En el resto de medidas, dado el enfoque ascendente utilizado en su aplicación, quizás pueda tener cabida dicha racionalización o reducción.

B) El obligado esfuerzo de las Administraciones no Agrarias en el Desarrollo Rural

Las necesidades del medio rural van más allá de lo estrictamente agrario y/o de las medidas de diversificación de las actividades productivas en las zonas rurales. Podemos citar necesidades de primer orden como: Educación, Infraestructuras, Electrificación, recuperación del patrimonio rural, Por tanto, no parece lógico que sea exclusivamente el FEOGA a través de sus dos secciones (fondos agrarios), o un posible Fondo Único que tenga su origen en dichos fondos agrarios, quien acuda a financiar estas actuaciones. Deberían habilitarse mecanismos para que, otros Fondos o Iniciativas resuelvan los problemas financieros de estas políticas.

La Comisión Europea y los Gobiernos Centrales y Regionales tienen la responsabilidad de crear y mejorar la red de servicios e infraestructuras en el medio rural para el mantenimiento de los agricultores y habitantes en las zonas rurales y evitar su éxodo a las zonas urbanas.

Las Administraciones deben ser conscientes de que sus respectivos Departamentos (Cultura, Economía, Educación, Sanidad, Medio Ambiente,...) deben estar coordinados y prestar especial atención al desarrollo rural, evitando la tantas veces citada, bipolaridad urbano-rural.

A este respecto queremos llamar especialmente la atención sobre el hecho de que, *LA ADOPCION DE FONDO UNICO PARA EL DESARROLLO RURAL NO SE CONVIERTA EN UN INSTRUMENTO-EXCUSA Ó CAJON DE SASTRE QUE JUSTIFIQUE LA NO APORTACION DE FONDOS DESDE EL CONJUNTO DE ADMINISTRACIONES EN EL MEDIO RURAL*

VALORACION DE LAS DIFERENTES OPCIONES PLANTEADAS POR LA COMISION

Sobre la opción 1:

Creemos que es un enfoque adecuado, toda vez que la instauración de un fondo único consiga solucionar el obstáculo fundamental en la gestión del desarrollo rural en la actualidad, o sea, los problemas de gestión del desarrollo rural derivados de la existencia de dos instrumentos con diferentes sistemas de funcionamiento (secciones garantía y orientación del FEOGA).

Como ya hemos indicado en apartados anteriores, las medidas hoy día vigentes, y al margen de nuevas incorporaciones en base a necesidades concretas que a nivel comunitario, nacional o regional puedan detectarse, pueden cubrir de forma satisfactoria los objetivos de competitividad, desarrollo sostenible y de protección de la diversidad de actividades. Así, además, se deduce de los informes anuales de Ejecución de los diferentes Programas, así como del correspondiente informe de Evaluación intermedia del actual periodo de programación 2000/06.

Sobre la opción 2:

Consideramos que es una opción lógica, en el sentido de enmarcar estrategias, tanto comunitarias como nacionales, en base a los 3 ejes principales (Competitividad, sostenibilidad y enfoque amplio), pero que, en todo caso, este aspecto no es incompatible con la denominada opción 1.

La reagrupación de las 26 medidas actuales, en función de los tres ejes definidos, supone ya un marco adecuado de estrategia común comunitaria, en base a la cual se articulen las estrategias nacionales.

El dar libertad excesiva en cuanto a las medidas puede conllevar a una pérdida precisamente de un marco común en la aplicación de estas medidas.

Además, y tal como hemos mencionado en nuestras consideraciones anteriores, las medidas actualmente en vigor y equiparables a los ejes 1 (competitividad) y 2 (medioambiente y gestión territorial) suponen un amplio abanico de medidas que los Estados Miembros pueden llevar a cabo. Distinto es el caso del tercer eje (desarrollo rural más amplio) que, lógicamente se presta obligatoriamente a un mayor grado de innovación continua.

Sobre la opción 3:

Rechazamos totalmente dicha opción ya que otorgaría tal grado de arbitrariedad, que estaría muy lejos de asegurar el cumplimiento adecuado de los tres ejes, especialmente el eje 1 (competitividad), así como tampoco aseguraría una aplicación homogénea en el conjunto del territorio de la UE. Propone unos porcentajes de aportación por ejes totalmente desequilibrada y desacorde con las necesidades reales de la UE.

5. CONCLUSIONES

- Consideramos la opción 1 como la mas adecuada, al poder combinar de forma idónea la experiencia y el amplio abanico de medidas vigentes- sin perjuicio de la incorporación de nuevas medidas-, con un sistema de programación simplificado que subsanaría el principal obstáculo con el que nos encontramos en el actual periodo , como es la dificultad de gestión con las dos secciones del FEOGA para medidas de carácter plurianual.

Además, consideramos que esta opción 1 , ya incluye el planteamiento general de enfoque estratégico que se propone en la opción 2, al estar enmarcado en torno a unas prioridades comunes de la UE y con la suficiente flexibilidad para su traducción a escala nacional.

- De la opción 2 podemos compartir el establecimiento de nuevos indicadores y planteamientos como el de sistema de información mas fluidos entre los EEMM y la CE.
- En todo caso, los ejes 1(competitividad) y 2 (medioambiente y gestión territorial) deben quedar con un enfoque descendente, al ser medidas con adecuado grado de concreción y que no permite ningún tipo de arbitrariedad
- Los fondos procedentes de la modulación deben dirigirse exclusivamente a medidas dirigidas al sector agrario en los ejes 1 y 2
- Respecto a la asignación presupuestaria por ejes consideramos que , partiendo del esquema de distribución asignado en la programación 2000/06, debería realizarse cierto trasvase del grupo 2 al grupo 1.

Esta redistribución esta claramente motivada por la necesidad de reforzamiento del eje competitividad , fundamentalmente, a raíz de los cambios estructurales necesarios en el sector agrario tras las reformas efectuadas en la PAC y las nuevas relaciones en el contexto mundial, especialmente centradas en una mayor apertura de los mercados.

A continuación destacamos el reparto entre los tres grandes ejes en el periodo anterior, según datos de la Comisión de la UE, así como la propuesta que consideramos necesaria para el próximo periodo¹²:

¹² Los diferentes apartados se corresponden con los 3 grandes ejes establecidos en el documento de la Comisión, así:

Competitividad, incluye las medidas destinadas a la reestructuración-reconversión y mejora de la competitividad en la agricultura

Medioambiente, incluye la gestión de tierras (zonas desfavorecidas, medidas agroambientales y forestación)

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4 June 2004

Dear Commissioner Fischler

RE: COMMENTS ON THE EXTENDED IMPACT ASSESSMENT (PARTS 1-3 FOR EU RURAL DEVELOPMENT POLICY POST 2006)

The statutory conservation, countryside and environment agencies of Great Britain¹³ would like to comment on some of the Commission's proposals for rural development policy post 2006.

EU rural development policy has a crucial role to play in achieving sustainable rural communities and environments in the EU. Over the longer term, it would seem to be the only justifiable *raison d'être* for the Common Agricultural Policy as a whole. Since rural

Diversificación incluye las medidas vinculadas a la economía y comunidad rural en un sentido mas amplio

¹³ The Countryside Agency, Countryside Council for Wales, English Nature, Environment Agency, Joint Nature Conservation Committee & Scottish Natural Heritage work together as the Land Use Policy Group (www.lupg.org.uk) on policy matters of common concern related to agriculture, woodlands and other rural land uses.

development is seen as a future focus of EU policy, affecting aspects of public interest as diverse as agriculture, forestry, food processing, rural communities, the environment, food quality, farm animal welfare and energy policy, it is essential that it adequately meets the needs of the next decade and more.

We strongly support the aim of a more integrated and strategic approach to rural development policy. We believe that there will be benefits for the environment and rural communities in a unified system of support that provides for properly integrated and simplified local and national programming. In principle we support the ‘more strategic’ approach outlined under Option 2. We welcome the proposal for a rural observatory to co-ordinate / oversee the process of monitoring and evaluation, that agri-environment type payments could be accessible to land managers other than farmers, for a comprehensive list of measures under *wider rural development* and integration of the LEADER approach. However, we have a number of key concerns with some elements of the proposals as they stand.

Our principal concerns are that:

- The paper does not generally recognise the central role of agri-environment policy that is a feature of the present Rural Development Regulation (RDR). We would argue that agri-environment measures represent the most important tool for promoting environmentally sustainable agriculture in the CAP, even in its reformed state. Many of the EU’s key environmental policy objectives – reduced water pollution, flood protection, maintenance of cultural landscapes and their associated biodiversity - can only be delivered via active management of large areas of countryside. Cross compliance or good farming practice can only ever achieve a baseline. Agri-environment policy therefore plays a crucial delivery role, and is most effective when it can operate both horizontally (i.e. ‘broad and shallow’) and zonally (i.e. ‘deep and narrow’). It has demonstrated its ability to reflect local and regional environmental and biodiversity concerns in both old and new Member States. It generates socio-economic benefits. Perhaps most importantly, because it is linked to delivering positive and identifiable public benefits, it has provided a new purpose in agricultural policy which the general public as well as farmers can appreciate.

- This lack of recognition is underlined by the proposal in Option 2 that (unlike Option 1) agri-environment schemes would not be compulsory for all Member States. This represents a real retreat from the broad rationale behind Pillar II that *‘a prominent role should be given to agri-environmental instruments to support the sustainable development of rural areas and to respond to society’s increasing demand for environmental services’* (EEC/1257/1999). The strengthening of this role for agri-environment schemes has been a recurrent theme in many of your speeches, is included in the new ‘Financial Perspectives’ and is central to the strategies laid out in Rural Development Plans. Losing this emphasis would, in our opinion, be a backward step. It would result in a downgrading of the policy, and in the role of environmental land management and the environment itself in sustainable rural development. It would communicate the message that sustainable agriculture was no longer of primary concern. Because of the trans-national impact of environmental actions, agri-environment schemes must remain a compulsory requirement for Member States, and we would also suggest that a minimum funding for Axis 2 of at least 50% of total programme funding is required for effective delivery. A significant proportion of funding also needs to be allocated to wider rural development.
- The proposals for targeting agri-environment schemes in Option 2, although they are not altogether clear, may introduce a substantial new restriction on how the policy could be used. A strictly ‘zonal’ approach could be highly restrictive if the measures were too narrowly limited to Natura 2000 sites or areas subject to erosion, flooding, etc. It would remove the possibility of developing schemes which address many important environmental concerns across the countryside as a whole, such as the maintenance of high natural value systems and specific landscape features (which are not necessarily restricted to these limited target areas). It is important both from the point of view of achieving wider environmental objectives, and developing a responsibility for environmental stewardship among farmers, that a comprehensive programme of agri-environmental measures is available throughout the entire territory of Member States. We would also like to see better integration of agriculture and forestry policy.
- Option 2 appears to change the baseline for agri-environment schemes, support for Less Favoured Areas etc, by proposing to replace Good Farming Practice (GFP) with cross-compliance (we assume as defined by EEC/1782/2003). Whilst we agree with the principle of harmonising the standards underpinning cross compliance (Annexes III & IV) with those

underpinning GFP, this must not be at the expense of lowering environmental standards. In some Member States, GFP is more comprehensive than the (proposed) scope of cross compliance, covering for example a broader spectrum of water pollution and landscape protection issues. Member States should have scope to apply conditions that go beyond EU and national legislation.

Above all, we are concerned about the funding that will be available to support the (proposed) Single Rural Development Fund. It would be a highly retrograde step from an environmental point of view, and in relation to a sustainable countryside, if funding overall or funding for agri-environment measures were to be reduced. On the contrary, if the requirements of the key environmental directives are to be met, we believe that a significant increase will be required.

Yours sincerely

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cc:

Commissioner Margot Walstrom, Commissioner for the Environment

