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**Greenpeace's feedback on the Roadmap on the  
"Review of the Agricultural State aid Guidelines"**

Greenpeace welcomes the opportunity to provide feedback on the Roadmap on the *"Review of the Agricultural State aid Guidelines"* and on the *"Review of the Agricultural Block Exemption Regulation"* (the Roadmap).

Greenpeace considers that the future State aid Guidelines for the period 2021 to 2027 should be adopted after a thorough revision of the Guidelines in force (Option 3), in order to fully take into account the changes that will result from the ongoing legislative process on a Regulation *"establishing rules on support for strategic plans to be drawn up by Member States under the Common agricultural policy (CAP Strategic Plans)"* (2018/0216 (COD)), as well as the impact of State aid to agriculture on climate, the environment and human health.

In accordance with the polluter pays principle enshrined in Article 192 TFEU, agricultural practices, such as intensive livestock farming, should not benefit from State aid, in light of their negative impact on the quality of the environment, on climate change, on human and animal health and on animal welfare.

Revised State aid Guidelines should clarify that public support should be available exclusively for those agricultural practices that are beneficial to the environment and human health, while producing positive social and economic impacts. They should be a tool to promote a radical change of paradigm in the way agriculture is organised and financed in the EU.

As Greenpeace pointed out, in its contribution to the Public Consultation on modernising and simplifying the Common Agricultural Policy (CAP), the intensive, industrial agriculture model currently dominating Europe's farmland is responsible for an utterly unsustainable use of finite natural resources.

Biological and agricultural diversity is lost as monocultures are given priority at the expense of important ecosystems, such as wetlands and permanent pastures. Soil erosion and degradation are the result of farming practices relying on synthetic fertilisers instead of aiming at improving soil organic matter. The dependence on chemical inputs, such as fungicides, insecticides, herbicides and fertilisers, pollutes water and soils further contributing to biodiversity loss.

Moreover, industrial farming remains a very inefficient and expensive farming system that fails to be resilient, because monocultures of genetically identical plants cannot withstand climate shocks and pest attacks.

Some sectors, such as livestock farming, have a disproportionately large impact on the environment. Livestock farming is responsible for a significant portion of the world's deforestation, as massive areas are cleared to grow soy to feed Europe's cows and chickens. Moreover, livestock is a major direct contributor to climate change, responsible for between 12 and 17 per cent of the EU's greenhouse gas emissions (see: Bellarby et al. (2013), Livestock greenhouse gas emissions and mitigation potential in Europe. *Global Change Biology*, 19: 3–18.). Our waterways and drinking water are polluted by excess animal excreta, harming human health.

The EU's Agricultural State Aid Policy should be re-designed to address negative externalities from industrial farming, particularly intensive livestock farming, curbing the flow of public funds supporting unsustainable practices.

Against this background, Greenpeace is concerned that the planned impact analysis, as described in the Roadmap, will fail to thoroughly identify the environmental and health repercussions of State aid to agriculture. Indeed, it stems from the Commission's document that the assessment will consider "*likely environmental impacts*" only for aid measures specifically related to climate change and the environment. The Roadmap does not expressly state the need to consider the environmental impact of other aid measures or schemes that may be authorised in the new Guidelines or in the Agricultural Block Exemption Regulation.

This appears to be in contrast with Paragraph 52 of the current Guidelines, which state that "[a]ll State aid notifications should in the future contain an assessment on whether or not the aided activity is expected to have any environmental impact", as well as with the integration principle laid out in Article 11 TFEU, according to which "*Environmental protection requirements must be integrated into the definition and implementation of the Union's policies and activities, in particular with a view to promoting sustainable development.*"

Consistently with this principle, the Commission should thoroughly assess the environmental impact of all aid measures to be included in the future Agricultural State aid Guidelines and phase out all measures currently in place that provide funding for environmentally and climate harmful practices.



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