

# Spanish CAP strategic plan

## Transition to sustainability or (bad) business as usual?

### What is at stake

Spain faces major challenges related to an agroecological and fair transition of the agricultural model. Spanish agriculture contributes to climate change (14.1% of national GHG direct emissions), impacts the quality of resources (45% of water bodies are in poor conditions) and biodiversity crisis (30% of farmland birds have disappeared in the last 20 years). The use of phytosanitary products has increased in the last year, while the country is committed to increasing the organic farming areas from 9.3% to 25%. Spain uses double the amount of active ingredients of veterinary antimicrobial agents for food-producing animals compared to the EU-27. Additionally, more than 11,000 farms have been lost in Spain annually between 2007-2014, and 51.9% of young farmers carried out agricultural activities without receiving CAP subsidies between 2014 and 2020. This piles up on the multiple challenges to maintain the population and cultural heritage in balance and ensure cohesion between rural and urban territories (>80% of the population lives in cities). While containing some useful measures, the Spanish CSP does not have the strength, nor ambition, to face these challenges.

### What is wrong with the Spanish CSP

- Direct payments supporting intensive farming: Basic Income Support for Sustainability and Redistributive Income Support are still based on historical rights and references, which mostly benefit intensive production. A double-threshold system in redistributive payment will not support the smallest farms.
- Insufficient baseline: Conditionality with minimum ambition only reinforces inefficient greening practices. While including the Water Framework Directive and Sustainable Use of Pesticides Directive is positive, it is unlikely to make any difference due to lack of enforcement.
- Eco-schemes working against environment: Eco-scheme for carbon farming (direct seeding) allowing the use of broad-spectrum herbicides will have a negative impact on biodiversity. Eco-schemes on irrigated land will receive 3 times more money per hectare than on rainfed land, which gives farmers a wrong signal in times of climate crisis and exacerbates water problems.
- Coupled income support and aid to producer organizations to drive environmental damage: These subsidies representing 21% of the CSP budget, will support productions with high negative environmental impacts as a consequence of input use, especially water, agrochemicals and energy. Crop and livestock-related payments do not incentivize the transition from intensive models to extensive agriculture.



- Harmful investment under rural development interventions: second pillar still including very harmful subsidies, especially in the case of productive investments for modernisation, transformation and infrastructures (allowing intensive wood plantations at the expense of HNV, macro-farms to the detriment of extensive livestock, irrigation without taking into account the state of the water bodies, etc.). They also include fake agri-environment measures without additional environmental benefits to conditionality (e.g., integrated pest management) and eco-schemes (e.g., sustainable crops with rotations or covers).

## This is how the Spanish CSP can help the transition to sustainability

- Aligning CAP strategic plan measures with the Green Deal objectives (Farm to Fork & Biodiversity Strategy to 2030) and establishing traceable quantitative goals (with indicators).
- Putting in place strong conditionality and strengthening its enforcement. SMRs shall include all provisions concerning the agricultural sector; including robust definitions and avoiding exceptions in GAECs (e.g. ban phytosanitary use in GAEC 6 and white fallow in GAEC 8, establish adequate grazing intensity in GAEC 2 - delayed to 2025, etc.), increasing land controls from 1% to 10% of CAP beneficiaries, enforcing penalties proportionally to non-compliance and promoting better coordination between environment and agriculture administrations.
- Designing an eco-scheme system that rewards multiple beneficial practices in the same land type to deliver environmental synergies and avoiding “greenwash” schemes. This would include banning broad spectrum herbicides use in eco-scheme supporting direct seeding.
- Redirecting coupled income support (e.g., sheep-goat, legumes, nuts) and aid through producer organizations (e.g., apiculture) to supporting high nature value farming and areas. On the other hand, coupled payments supporting industrial farming with negative impact on environment (e.g. calf fattening, beet, rice, and industrial tomato) shall be eliminated or minimized, and the depletion of local and third countries natural resources shall be reduced.
- All rural development interventions should be subject to compliance with conditionality (controls and sanctions) and include ban or, at least, safeguards on harmful subsidies. They should include AEPM for cross-cutting challenges (e.g. coexistence with large carnivores, transhumance, natural control of pests and diseases by natural predators, Natura2000) and innovative approaches (e.g. result-based payments, territorial contracts, land banks, associative or collective figures to implement AEPM).

