



**Evaluation of support for
organic farming in draft CAP
Strategic Plans (2023-2027)**

3 March 2022

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List of acronyms

AECMs: agri-environmental and climate measures
CAP: Common Agricultural Policy
CAP SP: Common Agricultural Policy national Strategic Plans
EC: European Commission

Introduction

All 27-EU Member States had to submit their Common Agricultural Policy (CAP) national Strategic Plans (SP) by 1 January 2022 to the European Commission (EC). As of 3 March, one country has still not submitted its two CAP Strategic Plans (Belgium for Wallonia and Flanders). With this evaluation of the support for organic farming in the different draft CAP national Strategic Plans, IFOAM Organics Europe wishes to ensure that the European Commission has all the information necessary to address shortcomings in the national support to organic farming in its upcoming Observation Letters, and to ensure that Member States have plans that will guarantee at least the continued growth of organic production during the next CAP period (2023-2027).

This report is based on a consultation process (questionnaire and interviews), undertaken by IFOAM Organics Europe with its members from April 2021 to February 2022, to assess the adequacy of the measures and budget to develop organic farming included in Member States' CAP Strategic Plans.

This document aims at providing an overview, based on IFOAM Organics Europe members' feedback, of the extent to which the new CAP 2023-2027 will contribute to further developing organic agriculture in the EU. It also includes recommendations to improve the support for organic farming and level up the ambition of the CAP national Strategic Plans so that they contribute to reach the objectives of the new CAP, as well as the targets set in the Green Deal, the Farm to Fork Strategy and the Biodiversity Strategy.

Overall, IFOAM Organics Europe is very concerned about the insufficient ambition and budgets to incentivise more farmers to convert to organic farming, and to reward organic farmers for the public goods they provide. More specifically, in comparison to the current CAP period (2014-2022), our members are concerned with the decrease of a comparative advantage for conversion of conventional farms to organic farming, compared to incentives to adopt other types of farming practices that are less transformative and provide much less environmental benefits. This alarming situation is mainly due to the lack of environmental ambition of the eco-schemes criteria as well as to issues for organic farmers to combine organic schemes with eco-schemes or agri-environmental and climate measures (AECMs).

IFOAM Organics Europe urges the European Commission to verify that all Member States have complied with the [Regulation \(EU\) 2021/2115 on CAP Strategic Plans](#)¹ during the approval process, as stated in the [Article 118](#) of this Regulation. The European Commission should also assess whether each CAP national Strategic Plan provide an explanation on how Member States will contribute to reach the new CAP's objectives as well as the Farm to Fork and EU Biodiversity Strategies targets.

This document is divided in two parts: (1) Analysis and recommendations to Member States and the European Commission to improve the draft CAP Strategic Plans before their approval, (2) Explanation of the evaluation country per country.

¹ Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013

URL: [EUR-Lex - 32021R2115 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/eli/reg/2021/2115/oj)

Analysis and recommendations to improve CAP national Strategic Plans 2023-2027

In many countries, the national organic farmland targets are insufficient to fairly contribute to the EU's overall 25% target by 2030

The Commission Implementing Regulation (EU) 2021/2289 of 21 December 2021²'s Article 2(2)(e) on the Intervention Strategy clearly states Member States shall set a national target of organic farmland by 2030 to prove their national contribution to the EU's overall 25% target of farmland managed under organic practises by 2030.

Member States shall 'include an explanation of the national contribution to achieving the Union's targets for 2030 set out in the Farm to Fork Strategy and the EU Biodiversity Strategy with a view to allowing the Commission to assess the consistency and contribution of the proposed CAP Strategic Plan to the Union's environmental and climate legislation and commitments and, in particular, to the relevant Union targets.'

But the analysis of the draft CAP Strategic Plans shows a clear gap between the EU ambition set out in the Farm to Fork Strategy and the EU Biodiversity Strategy and the too low level of support at the national level in many Strategic Plans. **Whereas the overall target of organic farmland in Europe by 2030 is 25%, several countries have not set ambitious enough targets to continue developing further organic farming.** Austria, Belgium Flanders, Denmark, and France have set too low targets. Bulgaria, Czech Republic, the Netherlands, Estonia, Spain, and Sweden have set unofficial target or no target at all. To have an overview of the potential and suggested shares of organic farmland to reach in each EU countries, please read our 'Prospects & developments for organic in national CAP Strategic Plans' study published in June 2021.³

Recommendations

- In line with the EU Action Plan on the development of organic farming (in particular the Action 9), the Commission should ensure that all **CAP Strategic Plans include a target for organic farmland that represents a fair contribution to the EU's overall 25% target**, and that the addition of the CAP Strategic Plans would enable to reach this overall target. Member States that still have not introduced a national target for organic farmland in their CAP Strategic Plan, such as Bulgaria, Czech Republic, Estonia, the Netherlands, Spain, and Sweden should do so, even if some of them have one in their national organic action plan.
- **Member States should have different targets based on an analysis of the organic sector's production needs and capacities**, and of its contribution to the CAP, European Green Deal, Farm to Fork, and Biodiversity strategies objectives. Member States with already a high level of organic land such as Austria, Denmark, France, Spain, and Sweden should continue to develop organic farming. Countries which set low ambitious targets compared to the national organic movement recommendations should increase their support to contribute fairly to the overall objective (Belgium Flanders, Hungary, Finland, Latvia, Poland, and Portugal).

² Commission Implementing Regulation (EU) 2021/2289 of 21 December 2021 laying down rules for the application of Regulation (EU) 2021/2115 of the European Parliament and of the Council on the presentation of the content of the CAP Strategic Plans and on the electronic system for the secure exchange of information

URL: [EUR-Lex - 32021R2289 - EN - EUR-Lex \(europa.eu\)](#)

³ URL: [ifoameu_advocacy_CAP_StrategicPlansAnd25Target_202106.pdf \(organicseurope.bio\)](#)

The national measures and budgets to support organic farming are in many countries insufficient to significantly develop organic land

It seems that **only a minority of Member States** (Belgium Flanders, Czech Republic, Denmark, Hungary, Finland, Slovakia, and Sweden) **have so far allocated enough money to support organic farming measures** and to reach their own organic farmland target set in their draft CAP national Strategic Plan.

On the contrary, **in most of the countries, the budget foreseen will be too low to properly support organic farming** and to reach their own national organic farmland target (e.g., Belgium Wallonia, France, Germany, Malta, Poland, Portugal, and Spain).

There are several issues linked to budgets: in some countries (Spain) the overall yearly budget available for organic will be lower than in the current CAP period; in others the overall budget might increase, but with an increased number of organic farms, organic farmers will receive on average lower levels of payments; in other countries payments for organic will be too low compared to payments to other “sustainable” practices, which in consequence will create a situation where conventional farmers will not be incentivised to convert to organic farming.

Organic levels of payments set under the CAP 2023-2027 period will be lower than the CAP 2014-2022 period in several countries

The analysis shows that **several countries, including large agricultural ones, will reduce the level of payments for organic compared to the previous CAP period (2014-2022)** (Austria, France, Germany, and Spain). For instance, Austrian organic farmers will receive in average EUR 205 per ha instead of EUR 235 under the previous CAP. French organic farmers will not receive support for organic maintenance anymore (and this will only be compensated by an eco-scheme at a much lower level).

Given organic farming is a solution to achieve the CAP’s environmental and climate objectives, **the reduction of payments for organic is contradictory to the ‘no-backsliding principle’** set out in the [Regulation \(EU\) 2021/2115 on CAP Strategic Plan’s Article 105](#) stating **Member States shall have a better performance with the CAP (2023-2027) than the previous one (2014-2020) regarding the benefits on the environmental and climate.**

*‘Member States shall aim to make, through their CAP Strategic Plans and in particular through the elements of the intervention strategy referred to in Article 109(2), point (a), **a greater overall contribution to the achievement of the specific objectives set out in Article 6(1), points (d), (e) and (f)**⁴, in comparison to the overall contribution made to the achievement of the objective laid down in Article 110(2), first subparagraph, point (b), of Regulation (EU) No 1306/2013 through support under the EAGF and the EAFRD in the period 2014 to 2020.’*

Recommendations

- **Budgets for support measures for organic farming for the CAP period 2023-2027 should be realistic and high enough to allow the country to reach its national target** (based on the expected rate of conversion to reach the target) **and to comparatively high enough payment rates to convince conventional farmers**

⁴ **Article 6(1) on CAP’s objectives**

d. ‘To contribute to climate change mitigation and adaptation;’

e. ‘To foster sustainable development and efficient management of natural resources;’

f. ‘To contribute to halting and reversing biodiversity loss, enhance ecosystem services and preserve habitats and landscapes;’

i. ‘To improve the response of Union agricultural to societal demands on food and health, to reduce food waste, to improve animal welfare and to combat antimicrobial resistance;’

to engage in the whole farm re-design that conversion to organic management entails. Similarly, conventional farmers are unlikely to transition to organic farming if less ambitious standards and practices benefit from equal or higher payment rates, or if payments stop after the 3 or 5 years of the conversion period. For more information about how much funding should be allocated to organic farming at national level to fairly contribute to the 25% EU overall target, please read our 'Prospects & developments for organic in national CAP Strategic Plans' study.⁵

Organic farmers have restrictions to access to environmental payments in some countries due to the alleged “double funding” issue

Because of the restricted access of organic farmers to eco-schemes and because of the impossible combination of organic schemes with AECMs in many countries, a vast majority of organic farmers will lose support compared to the previous CAP period or will be remunerated at the same level than conventional farmers adopting less environmentally ambitious practices. For instance, in Finland, if organic farmers chose to apply for one eco-schemes, their level of payments for organic schemes or AECMs will be lower. In Germany, the level of payments for organic farmers will be lower given **the perceived double funding issue between Eco-schemes and Rural Development measures** remains with the consequence that farmers taking part in eco-scheme extension of grassland leads to EUR 50 deductions in Rural Development measures (eco-premium payments). Moreover, the Eco-Scheme “no pesticides application” is not accessible to organic farmers.

The impossibility of combining organic schemes with other schemes also triggers a lack of comparative advantage and attractiveness for organic farming in Bulgaria, Estonia, Finland, Germany, Ireland, Latvia, and Spain. Hence conventional farmers will be less incentivized to convert to organic. In the other way, **there is a risk in some countries such as Estonia and Latvia, that organic farmers go back to conventional farming.**

Recommendations

- Member States should, ideally, include payments for public goods and environmental services, where all farmers, organic or conventional, would receive payments proportional to their contribution to the protection of natural resources. But since this is unlikely to happen, **Member States should provide an adequate level of support for maintenance and conversion to organic farming, at least at the same level as in the 2014-2020 period but preferably at a higher level to boost organic production.** Support for organic conversion and maintenance could be funded via rural development measures under the second pillar, via Eco-schemes under the first pillar, or through a combination of both.
- **Member States should ensure organic farmers can have access to eco-schemes set under the first pillar as well as to relevant agri-environmental and climate measures set under the second pillar. Organic farmers should not be excluded from these measures on the ground of alleged “double funding” issues linked to their organic schemes.** Member States should ensure that practice definitions do not unintentionally exclude organic farms and include options specifically targeting and building on minimum organic standards, so that opportunities to benefit from synergies and enhanced delivery of environmental outcomes, especially for biodiversity, can be exploited⁶.

⁵ URL: [foameu-advocacy-CAP-StrategicPlansAnd25Target-202106.pdf](https://foameu-advocacy-cap-strategicplansand25target-202106.pdf) (organicseurope.bio)

⁶ https://read.organicseurope.bio/publication/organic-farming-and-biodiversity/options-for-future-policy/#block_60ed94fc3f961

Organic farming will have a lower comparative advantage than before due to lack of ambition in the criteria set for eco-schemes

The analysis also concludes that some **countries plan eco-schemes with very low criteria in terms of environment, biodiversity, and animal farming**, and which will be accessible to almost every farmer given their low ambition. This is the case in Belgium Flanders and Croatia.

Moreover, countries such as France plans to give equal or even higher levels of payments (mainly for eco-schemes) to farmers who engage in less ambitious standards or practices compared to organic standards. Organic will be remunerated under eco-schemes at the same level than the High-Environmental Value (HVE) label, even though the environmental benefits of the HVE schemes are not proven. In Bulgaria, the High Nature Value grassland measure will have a higher rate than the organic grassland measure.

As organic farming has higher benefits on environment, climate, and animal welfare than conventional or other type of farming, **Member States should give organic with the higher rank in their eco-schemes rating system mentioned in the Regulation (EU) 2021/2115 on CAP Strategic Plan's Article 31(8) and ensure it is remunerated for the public goods it delivers.**

*'Member States shall demonstrate how the agricultural practises committed under eco-schemes respond to the needs referred to in article 108 and how they contribute to the environmental and climate architecture referred to in article 109(2) point (a) and to animal welfare and combatting antimicrobial resistance. **They shall use a rating or scoring system or any other appropriate methodology to ensure the effectiveness and efficiency of the eco-schemes to deliver on the targets set. When establishing the level of payments for different commitments under the eco-schemes pursuant to paragraph 31(7)(a), Member States shall take into account the level of sustainability and ambition of each eco-schemes, based on objective and transparent criteria.***

Recommendations

- **Organic farming should be recognized by Member States as a solution to achieve the CAP's environmental and climate objectives.** The CAP 2014-2020 performance assessment⁷ stated '*Organic farming clearly produces benefits for biodiversity, soil and water, climate mitigation and animal welfare, while reducing the use of chemical pesticides and antimicrobials*'. It also concluded organic farming increased by 34% the on-farm biodiversity, and increased soil's carbon sequestration capacity.
- Member States should set **payments rates proportionate to the ambition and benefits of the farming systems and standards they support** and should ensure these payments rates provide a comparative advantage to organic conversion and maintenance, compared to less ambitious standards or single practices that deliver less environmental benefits. The payments for eco-schemes should go beyond the "lost revenue / income foregone" calculation method to reward public goods through incentives. For more information on how to use eco-schemes, please read our guide for managing authorities⁸.

⁷ URL: [CAP performance: 2014-20 | European Commission \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&plugin=1)

⁸ Lampkin N, Stolze M, Meredith S, de Porras M, Haller L, Mészáros D (2020) Using Eco-schemes in the new CAP: a guide for managing authorities. IFOAM EU, FIBL and IEEP, Brussels. URL: www.organicseurope.bio/content/uploads/2020/06/ifoam-eco-schemes-web_compressed-1.pdf?dd

Overview of the national targets, budgets, and main concerns for organic farming (table)

Countries	Current share of organic farmland	Government's target of organic farmland	National organic movements' recommendations for the share of organic farmland	Government's planned budget for organic farming	National organic movements' analysis of the planned budget for organic farming	Does organic farming have a comparative advantage compared to other types of farming and before?	Main challenges raised by national organic movements
Austria	26.5%	30% by 2027	35% by 2027	The basic support for organic is EUR 205 per ha	The budget for organic decreased; the basic support was EUR 235/ha in the previous CAP period (2014-2022).	Organic farming has less comparative advantage than before	The lower comparative advantage of organic and the lower basic payments for organic farming might not incentivize farmers to convert to organic.
Belgium Flanders (CAP SP not submitted)	0.5%	1.77%	5% by 2027	EUR 4,916,800 for maintenance of organic. EUR 7,134,500 for conversion to organic	The budget for organic will be enough to reach the 1.77% target.	There are some uncertainties about the combination of payments. Low criteria for eco-schemes.	The definition of active farmer might exclude many organic farmers. Not ambitious target.
Belgium Wallonia (CAP SP not submitted)	12%	30% by 2030	30% by 2030	EUR 140 million for organic for the whole CAP period	The budget for organic is not enough. It increased by 7-10% whereas an increase of 10-20% would be needed.	Depending on the type of farms, organic farming has/has not a comparative advantage.	The budget will be insufficient to reach the 30% target.
Bulgaria	3.2%	No official target	15% by 2027	Not assessed by our member yet.		Organic farming does not have a comparative advantage because of double funding issues.	The lower comparative advantage of organic farming will not incentivize farmers to convert to organic. Too much administrative burden for organic farmers.
Croatia	7.8%	15% by 2030	15% by 2030	EUR 1,750,000 million for organic for the whole CAP period and under first pillar.		There are still unclarities for the combination of payments. Low criteria for eco-schemes.	Lack of trainings on organic, too much grassland instead of food production, no comparative advantage.

Czech Republic	15.3%	22% by 2027 and 25% by 2030 in the national organic action plan	22% by 2027 and 25% by 2030	Please see the page on Czech Republic for detailed budget.	The budget will be enough to reach the 22% target by 2027.	Organic farming has a comparative advantage compared to other types of agriculture.	GAEC 6 and 7 imply no bare land in post-harvest period, which is an issue for organic farmers.
Denmark	10.9%	20% by 2030	30% by 2030	DKK 1,894 million for 2023-2027. DKK 3,556 million for 2023-2030. EUR 100/ha for maintenance of organic.	The budget will be sufficient to reach the 20% target.	Organic farmers have a comparative advantage compared to other types of farming.	The CAP payment model should shift from a model based on hectare to a model based on public goods and results.
Estonia	23% i.e., 229,400 ha (2021 data)	No official target. Only an unofficial one of 230,000 ha by 2027	30% by 2027	EUR 120 million for organic for 2023-2027.		Organic farming does not have a comparative advantage compared to conventional farming.	Lack of comparative advantage might trigger a risk that current organic farmers decide to go back to conventional farming and that conventional farmers are not incentivized to convert to organic.
Finland	13.9% (2020 data)	20% by 2027 and 25% by 2030	25% by 2025 and 30% by 2030.	EUR 380 million for the whole CAP period. EUR 160/ha for maintenance of organic farming.	The budget is sufficient to reach the government's 20% target.	Lack of comparative advantage due to double funding. Organic support in AECMs is not sufficient.	Subsidies are not sufficient to incentivize the transition to organic farming.
France	7.7%	18% by 2027 and 20% by 2030	20% for 2027 and 25% for 2030.	EUR 340 million for conversion to organic (in average EUR 250/ha) + EUR 82/ha for organic eco-scheme.	EUR 1 billion per year (500 million for eco-schemes + 523 million for conversion) would be needed to reach 20% by 2027. France withdrew the support for maintenance of organic.	Lack of comparative advantage	No more payment for maintenance, organic farming will be remunerated at the same level than HVE (so-called High-Environmental Value) in eco-schemes.

Germany	9.7%	30% by 2030	30% by 2030	The budget for organic farming will only enable for each 14% of organic farmland as mentioned at the end of the CAP Strategic Plan, which is far from the 30% target.	No increase foreseen in terms of the budget so it will be insufficient to reach the 30% target. It needs to be confirmed once the CAP SP is submitted.	The perceived double funding issue between Eco-schemes and Rural Development measures remains with the consequence that farmers taking part in eco-scheme extension of grassland will face EUR 50 deductions in Rural Development measures (eco-premium payments). The Eco-Scheme “no pesticides application” is not accessible to organic farmers.	The level of payments for organic will be lower and organic will lack of comparative advantage, which does not incentivize to convert to organic.
Hungary	5.7%	10% by 2027	12% by 2027	The budget for organic farmers might be significantly higher than before: EUR 112 million for 2022-2025.	The budget is sufficient to reach the 10% target.	There is a comparative advantage where the funding rate is higher for organic farmers (e.g., investment calls).	The national Organic Action Plan is not yet accepted by the Ministry. There are no KPIs/budget/responsible for the systematic development of the organic sector (not only area conversion subsidy).
Ireland	1.6% (2019 data)	7.5% by 2027	7.5% by 2027	EUR 256 million for the whole organic farming scheme.	Existing payment rates for organic farming are on average 50% lower than EU level average.	Organic farmers do not have a clear comparative advantage	Some tweaking of existing payment rates for certain sectors appear not to sufficiently reflect the costs of organic production.

Italy	15.2% (2029 data)	25% by 2027	25% by 2027 is realist. One member recommends a target of 50% by 2030.	EUR 2.5 billion for 2023-2027.	The budget is higher than in the previous CAP period.	Organic farmers will have access to four eco-schemes out of five.	There will be no eco-scheme for organic farming.
Latvia	17% (early 2022)	18.78% by 2027	18.78% is not ambitious. The study we commissioned ⁹ suggests a target of 25% by 2030.		There is a reduction of support to organic farming under the planned support system.	There is no comparative advantage for organic farming compared to conventional.	There is a risk organic farmers want to quit organic farming and go back to conventional due to lower support.
Luxembourg	5.18% (2021 data)	20% by 2025 ¹⁰	20% by 2025.	There will be an increase from EUR 2 million in 2020 to EUR 11 million in 2025 for national support to organic farming (CAP SP, OAP, etc.)	Our member does not know if this budget will be enough to reach the 20% target. Organic farming needs to get the best option for subsidies, otherwise it will not be interesting enough for farmers to convert.	There is no comparative advantage for organic farming.	The CAP payment model needs to shift to a better reward system based on climate environmental and animal welfare benefits of farming practises.
Malta	0.4%	2% by 2030	The study we commissioned ¹¹ suggests a target of 2% by 2030.	There is information on the budget. EUR 2,000 were dedicated to organic in 2018.	Between 10,000 and 100,000 per year are needed to reach 2%. 1-ha farm should be subsidized EUR 4,000 on annual basis.	There is no comparative advantage for organic farming compared to conventional.	The fragmentation of land leads to pesticide contamination. The administrative burden dissuades to convert to organic farming.

⁹ URL: [ifoameu_advocacy_CAP_StrategicPlansAnd25Target_202106.pdf](https://www.ifoameu.org/advocacy/CAP_StrategicPlansAnd25Target_202106.pdf) (organicseurope.bio)

¹⁰ The government fixed 2025, because they decided this goal in 2018 and it should be manifested as a national goal beyond the next elections in Luxembourg 2023.

¹¹ [ifoameu_advocacy_CAP_StrategicPlansAnd25Target_202106.pdf](https://www.ifoameu.org/advocacy/CAP_StrategicPlansAnd25Target_202106.pdf) (organicseurope.bio)

The Netherlands	3.8%	There is no target	The study we commissioned ¹² suggests a target of 25% by 2030.	There is no budget targeted to organic farming.	The study we commissioned suggests an annual budget of EUR 119.6 million to reach the suggested 25% target (if 100% certified area supported).	Organic farmers will get a competitive advantage as they will automatically comply with the eco-schemes.	There is a lack of clear vision from the government to find a system rewarding farmers for their contribution to sustainable food production.
Poland	3.4% (2020 data)	7% by 2030	The study we commissioned ¹³ suggests a target of 10% by 2030.	EUR 781,10 million for organic farming 2023-2027.	The budget is insufficient to reach the 7% target.	There is a lack of comparative advantage for organic farming compared to conventional farming.	The budget dedicated to organic farming is too low. Some clarifications on measures and budgets set for organic are needed. More advisory services and sustainable public procurement are needed.
Portugal	18% (2021 data)	19% by 2027	19% is too low.	EUR 390.16 million	The budget is too low.	Combinations of payments might be possible for organic farmers.	Both strategy and budget for organic are too low to incentivize farmers to convert to organic nor to have a real improvement that would contribute to a better environment and health. The strategy can only enable to maintain the current situation.

¹² Same as above.

¹³ Same as above.

Slovakia	10.3%	14% by 2027	14% by 2027.	EUR 1,360,000 for organic for 2023-2027.	The budget is sufficient to reach the 14% target.	There is a lower comparative advantage for organic compared to the CAP period 2014-2022 due to double funding issue between eco-schemes and organic schemes.	Organic farming should have access to eco-schemes and be remunerated for their benefits on the environment and biodiversity.
Spain	9.7%	25% by 2030 (unofficial target)	25% by 2030	EUR 752 million for the whole CAP period (compared to EUR 400 million per year for the previous period)	EUR 1,100 million per year are needed to fund 100% of the organic certified farmland and reach the target of 25%.	Lower comparative advantage and lower budget for organic farming	Insufficient budget for organic farming, which is also lower compared to the previous CAP period 2014-2022.
Sweden	20.4%	There is no official target. The government plans a 30% target by 2030, but it has not been voted by the Parliament.	30% by 2030	The total budget of the Swedish CAP SP is available but there is no information per measures.	Given the overall budget will be EUR 800,000 higher than for the previous CAP period 2014-2022, the budget for organic should be enough.	Organic farming has a lower comparative advantage than during the previous CAP period.	The CAP Strategic Plan lacks climate ambition due to strong voices saying there is no proof that organic farming is a solution to address climate change.

Evaluation per country

Austria

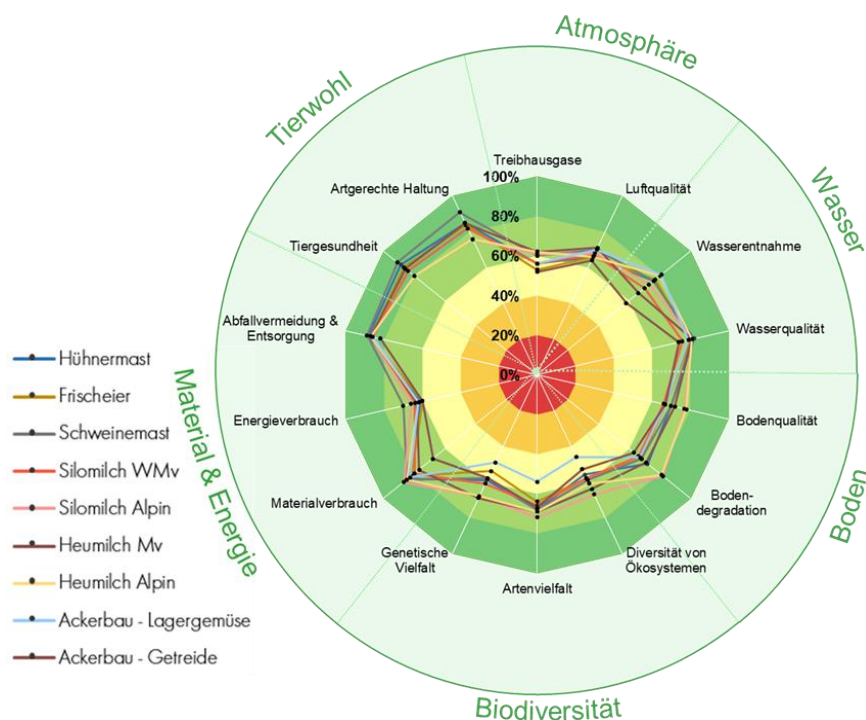
Austrian organic movement's main concerns are that basic payments of organic are lowered compared to previous CAP periods. Thus, despite some organic farmers will be able to compensate with top-ups, the comparative advantage will be lower than the previous CAP period (2014-2022).

Austria has a 30% target of organic farmland by 2027. Given the 26,5% level in 2020, the Austrian organic movement considers 35% as a fairer target to properly contribute to the EU's overall 25% target.

In Austria, organic farmers will face a substantial rise in obligations in the measure for organic farming (set-aside of 7% of farmland for biodiversity measures), but the basic support per hectare (ha) for organic will decrease from EUR 235 per ha to EUR 205 per ha. At least, organic farmers will still benefit from the 5% Bonus in the investment measure: it is set at EUR 150 more per year for 1 year in conversion to organic.

The budget for agri-environmental and climate measures is projected higher than the previous CAP (2014-2022): EUR 150,60 Million per year, but one cannot compare the figures directly because the new measure has a different architecture offering a basic payment and top-ups for obligations going beyond.

Organic farming should be rewarded for the positive effects it has in various environmental fields and not only in one (as it would be with single measures). Therefore, organic has higher efficiency and run less expensive in the long-term than the funding of other agricultural practices with a short-term approach. The Austria organic movement has commissioned a study at FIBL to assess the sustainability performance of organic farms in Austria, showing clearly the multifunctionality of organic.



Belgium – Flanders

Belgium Flanders' CAP Strategic Plan has not been submitted yet.

Flemish organic movement's main concerns are that the organic farming is not supported enough in the CAP Strategic Plan. The target for organic farmland is very low and not ambitious. The definition of 'active farmer' is still not clear in Flanders. It is important to ensure part-time and pluri-active farmers are also eligible to CAP funding, and not only full-time farmers.

Belgium Flanders has a very low organic farmland target of 1.77% by 2027. The government calculated this target based on the progress of organic farming over the past few years. **Our Flemish member BIOFORUM advocates for at least a 5% target by 2027** and to fairly contribute to the EU's overall 25% target.

The budget dedicated to the maintenance of organic farming is EUR 4,916,800 for the whole CAP period (2023-2027). The first 0-5 hectares get a payment of EUR 200 per hectare, the next 5-20 ha get EUR 100, and from the 21st ha no more support is granted. So, an organic farm will get EUR 2,500 as a maximum. **The budget for maintenance is lower than the previous one, but combinations with many other premiums (AECMs or eco-schemes) will probably be possible,** whereas there is currently a lot of restrictions because of the "double funding".

The budget dedicated to the conversion to organic farming will be EUR 7,134,500 for the whole CAP period (2023-2027). It will be higher than the current one but combinations with eco-schemes or other AECMs are more difficult. The budget for grassland and perennial fodder crops is EUR 390 per hectare. The budget for cropland is EUR 900 per hectare. The budget for fruit and vegetables and herbs is EUR 1,700 per hectare. **The budget is enough to reach the 1,77%.**

Organic farming has a comparative advantage because the combination of the maintenance premium with other measures is possible. **Nonetheless, criteria of eco-schemes are in quiet some cases rather low which enables some farming practises to be remunerated even though they produce low environmental benefits.**

The situation for organic farming is not great in Belgium Flanders, whereas there is a potential for growth. The draft CAP Strategic Plans might support practices stimulating big farms with newest technological features (e.g., new stables for cows with expensive floors so there is less ammonia going out of the stables) instead of improving organic and agroecological farming.

Belgium - Wallonia

Belgium Wallonia's CAP Strategic Plan has not been submitted yet.

Belgium Wallonia's organic movement's main concerns are that the budget set for organic farming in the new CAP Strategic Plans won't be enough to reach the regional organic farmland target.

Belgium Wallonia has a 30% target of organic farmland by 2030. 12% of the farmland in Wallonia is currently under organic farming.

Belgium Wallonia decided **to increase the budget for organic farming by 7-10%** compared to the previous CAP period (2014-2020). **The budget for organic represents EUR 140 million under the second pillar** (out of the EUR 2 billion for the whole CAP SP). Nonetheless, according to our members, **the budget for organic should increase by 10-20% to reach the 30% target.**

Overall, organic farming has a similar comparative advantage than during the previous CAP period (2014-2022), but this advantage depends on the type of farm. For instance, the comparative advantage will probably be higher for large organic cultures, which will receive more payments than before. For vegetable producers having less than 3 hectares, payments can be EUR 4000 per hectare. On the contrary, the advantage will probably be lower for other measures such as organic bovine husbandry. This information must be confirmed by simulations that are in process.

Bulgaria

Bulgaria's CAP Strategic Plan has been submitted this week. The country has a new government since mid-December 2021, which created delays to draft the CAP national Strategic Plan.

Bulgaria has no official target of organic farmland. Our Bulgarian member advocates for a 15% target by 2027. Bulgaria currently has 3.2% of organic farmland. Last year, 30,000 hectares were excluded from certification.

The actual version of the strategic plan includes two eco-schemes for organic maintenance payments in the first pillar: one for organic crops (one rate per ha whatever the type of crop) and **one organic grazing animals** (payments per animal unit whatever of the type of animal).

In the second pillar, one intervention 'organic farming' is planned with two sub-interventions: one for the transition to organic and one for the maintenance of organic. The design of the intervention is like the current Measure 11. There will be payment for crops, grazing animals, pigs (new support) and bee's families.

The division of plants into 25 crop groups is new. The payment rate for plants is divided into 3 parts:

- basic payment,
- supplement for proven production of at least 70% of the national average,
- supplement for the use of organic seeds and planting material.

Farmers who claim support for maintaining organic production as an eco-scheme under the first pillar cannot claim the first component (basic payment) of the intervention under the second pillar.

Another new feature is the introduction of a regressive rate for each of the crop groups, with 100% paid up to 50 ha; 50% from 50 to 65 ha and 10% over 65 ha. The regressive rate will not apply to grassland, pastures, and forage crops.

Our Bulgarian members advocate for the transfer of organic maintenance support from the second pillar to the first pillar in the form of one eco-scheme dedicated to organic farming. They want to keep the support for conversion to organic under the second pillar. This new structure would enable to increase the support to organic farming.

Our Bulgarian member proposes to decrease the number of crop groups (no more than 10) to reduce the risk of errors and the administrative burden of application, as well as to ensure an adequate budget to guarantee at least 6% organic area by 2027.

So far, there is no budget allocated to measures for organic so no assessment can be done. Our member knows that in the current AECMs, the payment rate per hectare for the old varieties measure is higher than the organic crop production measure and the combination of old varieties with organic production is not possible. The High Nature Value grassland measure has a higher rate than the organic grassland measure. **This situation does not allow organic farming to have a comparative advantage compared to conventional farming.**

There is also a tendency to not allow organic production to be combined with other measures such as AECMs nor eco-schemes. It deprives organic producers of the possibility to receive higher payments by combining different practices that they carry out anyway.

Croatia

Croatian organic movement's main concerns are that the CAP payment model remunerate people for owning land instead of incentivising them to implement sustainable farming practises. Our Croatian member are concerned by the lack of comparative advantage of organic farming because of the double funding issue. They also recommend more trainings to increase the knowledge in organic farming of Croatian farmers.

The Croatian government set up a 15% target of organic farmland by 2030 (for a current share of 7.8%) in the CAP Strategic, which is a **fair target** according to the Croatian organic movement.

The development of organic farming mainly consisted in the increase of organic pastures, grassland, and orchards, and the organic vegetable production has not grown that much in the previous years. This is due to CAP payment model based on hectares.

The budget set for organic farming under the first pillar is EUR 1,750,000 million for the whole CAP period (2023- 2027).

Most of the eco-schemes -representing EUR 93.4 million per year- will be available to conventional farmers only. **Payments for maintenance of/conversion to organic farming will not be compatible with eco-schemes because of the double funding issue.** Moreover, criteria for eco-schemes are very low and do not incentivize practises with high environmental benefits.

Organic farming will lack of comparative advantage given conventional farming will have a higher remuneration given they can cumulate more payments/schemes.

Czech Republic

Czech organic movement's main concerns are related to GAEC 6 and 7 which imply no bare land in post-harvest period, not even for organic farmers. In this climatic area, it is very important organic farmers can do autumn tillage (and not spring tillage) to prepare for the winter and to keep the water in the field. The Czech government declared a 22% target of organic farmland by 2027 and 25% by 2030 in the national organic action plan. In Nov 2021, the area used in organic farming was 557.3 thousand ha ie. 15.6% of agricultural land registered in the LPIS. These targets are **fair and achievable** according to our Czech members.

The strategic plan of the CAP will contribute to the national OAP goals mainly through the intervention of the Ecological agriculture. On top of the national target of organic farmland, **the government planned other tools contributing to the support of organic farming in the CAP SP**. Support for:

- investments in the development of processing capacities as preferential criteria and points EZ benefits,
- modernising organic farms in the form of preferential criteria and point benefits for organic farming,
- introduction of effective advice for farmers in conversion to organic farming (transitional period) and for organic farming farms,
- a common market organization.

Nonetheless, organic farmers won't be able to receive money for most animal welfare measures except one regarding young bovine. Eco-schemes have low environmental criteria so almost every farmer will be eligible. **Our Czech member advocates for one eco-schemes dedicated to organic farming for the capital city Prague, given the city is not eligible to the Rural Development Programme (RDP).**

Maintenance and conversion support are both covered in the second Pillar, which is stronger than the first Pillar. **The budget (see below) will be sufficient** to reach the national target of organic farmland. The national contribution to the co-financed RDP is 65%.

Budget for the transition to organic farming:

- basic treatment of grasslands - 106 EUR / ha (compensation rate 95%)
- cultivation of grasses and perennial forages on arable land - 137 EUR / ha (compensation rate 60.20%)
- cultivation of vegetables, special herbs, potatoes, and strawberries - 660 EUR / ha (compensation rate 25.18%)
- cultivation of other crops - 323 EUR / ha (compensation rate 56.70%)
- intensive orchards - 896 EUR / ha (compensation rate 58.80%)
- other orchards - 536 EUR / ha (compensation rate 39.10%)
- vineyards - 900 EUR / ha (compensation rate 41.45%)
- hop gardens - 900 EUR / ha (compensation rate 41.45%) In the case of growing vegetables on a total area of up to 6 ha, the subsidy rate is 680 EUR / ha.

Budget for the maintenance of organic:

- basic treatment of grasslands - 100 EUR / ha (compensation rate 95%)
- cultivation of grasses and perennial forages on arable land - 120 EUR / ha (compensation rate 60%)
- cultivation of vegetables, special herbs, potatoes, and strawberries - 638 EUR / ha (compensation rate 25.13%)
- cultivation of other crops - 239 EUR / ha (compensation rate 73.50%)
- intensive orchards - 850 EUR / ha (compensation rate 56%)
- other orchards - 510 EUR / ha (compensation rate 37.30%)
- vineyards - 847 EUR / ha (compensation rate 70.40%)
- hop gardens - 847 EUR / ha (compensation rate 70.40%) In the case of growing vegetables on a total area of up to 6 ha, the subsidy rate is 660 EUR / ha.

A comparison of organic farms and conventional farms (through vegetable, arable land, permanent pasture) will be the basis for the calculation of payment rates. The Ministry of Agriculture will decide which percentage of this difference it will pay. This will be done also according to the available EU rural development budget which decreased significantly for the Czech Republic (reduction of 16% compared to 2014-2022). **Organic farming has a comparative advantage compared to conventional farming.**

Denmark

The Danish organic movement's main concerns are the need to shift from a payment model based on hectare to a payment model based on public goods and result-based approach. The CAP Strategic Plan should apply a climate accounting system where farmers would need to prove they deliver on biodiversity and lower the greenhouse gas emissions.

There is a national target to double the area and market from 2020 to 2030, to reach approximately **20% of organic farmland by 2030. This target is realistic according to our Danish member, whom would have been happy to see an even higher target of 30% target.**

The Danish government planned DKK 1.894 for organic farming for the period (2023-2027) and DKK 3.556 million for organic farming for period (2023-2030) **which will be sufficient to reach the 20% target of organic farmland. The budget for maintenance to organic is EUR 100 in average per hectare under the first pillar.**

Certified organic farmers will be eligible for eco-schemes. There will be one eco-scheme dedicated to organic farming despite our Danish member would have preferred a general eco-scheme payment based on a climate and field eco-space/climate accounting system as mentioned above. In some cases, the farmer should choose to which eco-schemes they want to apply because they cannot cumulate all of them.

It is possible to apply for an additional payment to cover extra cost during the period of conversion subsidy rate DKK 1600, in condition organic practice is continued for at least 5 years.

To apply for eco-scheme for organic production the farmer must respect a nitrogen (N) ceiling on 107 kg efficient N/ha. There is option apply for additional payment if then nitrogen ceiling is lowered to 65 kg efficient N/ha. subsidy rate DKK 650/ha

There is also an optional additional payment to organic fruit and berry production (DKK 4.000/ha)

Estonia

Estonian organic movement's main concerns are the lack of comparative advantage for organic farming compared to conventional farming due to very low payments rate for organic. There is a risk that current organic farmers decide to go back to conventional farming and that conventional farmers are not incentivized enough to transition to organic farming.

Estonia's current share of the organic farmland is 23% (229.400 ha in 2021). **There is no official governmental target yet. Our Estonian member advocates for a target of 30%.** At the beginning of this year, the Ministry of Rural Affairs started to prepare a national organic development plan -also involving stakeholders in the preparation process- which will probably set a target for 2030. The preparation of the plan should be finalised by autumn 2022. However, if we look at Estonia's CAP Strategic Plan, **there is a non-official target for supported organic area (together with land in conversion) of only 230.000 by 2027, which is like the current share, and less ambitious than** the unofficial target of 250.000 set in the draft version dated of July 2021.

The planned budget for organic is EUR 120 million for the whole CAP period (2023-2027). The budget for organic conversion and maintenance will be under the first pillar as eco-scheme and under the second pillar as organic animal husbandry support.

Regarding the calculation, there is no competitive advantage proposed for organic farming. Most of the planned support rates are not motivating for farmers. Despite some of the very low support rates (e.g., much lower than now related to animal husbandry) of the initial draft proposal (July 2021) were slightly increased, **it is difficult to predict if this is enough to incentivize organic farmers to continue maintaining their farm under organic practises and not going back to conventional farming.** For example, a lot of arable farmers are already discussing the possibility of quitting organic farming because of low support rates. Payment rates are not considered to be proportionated to the ambition and benefits of organic farming and **do not give comparative advantage to incentivize conventional farmers to convert to organic.**

The compensation for additional costs/lost income will be for the main animal groups 18-47% (the calculation includes higher price for organic products) while for some other measures planned for conventional farmers the rate is up to 100%. Similar low shares are also related to the organic agricultural land.

Organic farmers can apply for several other AECMs, however the present draft of these measures is rather complicated, and some payment rates are much lower for organic farmers (e.g., rate for environmentally-friendly management scheme).

Finland

Finnish organic movement's main concerns are that the organic farming won't be an attractive option for Finnish farmers. Organic support is not sufficient level in AECMs, and organic farmers will be fully paid only for one eco-scheme out of four, and subsidies for grazing under animal welfare payments is not available for organic farmers because of double funding. Subsidies are not sufficient to incentivize the transition to organic farming.

Finland's national **target for organic farmland is 20% by 2027**. The Finnish organic movement considers that **25% organic farmland for 2027, and 30% by 2030 would have been better** for Finland and the contribution to the EU's overall target.

The budget for organic is higher than the previous one: EUR 380 million for the whole CAP period (2023-2027) (EUR 76 million per year). Organic support will be paid in AECMs, and basic support is EUR 160/ha, vegetables EUR 590/ha and organic animals EUR 130/ha (1 livestock unit justifies 2 ha support). **Our Finnish members believe the budget should be sufficient to 20 % target, even they don't believe that it will be reached.**

The previous greening measures (EUR 75 per hectare) under CAP 2014-2022's first pillar will be replaced by 4 eco-schemes in the new CAP 2023-2027's first pillar. These eco-schemes are like the previous AECMs. **Organic farmers will get less funding than with the previous greening measures, because if they choose between 2 and 4 measures, then they will lose their AECMs supports.**

1. **Soil cover:** support is incentive-based EUR 30-70/ha. Planned annual outputs from agricultural land are 62%. **Organic farmers can choose this one, but no higher compensation is paid for green vegetation.** A stubble sprayed with glyphosate receives the same compensation.
2. **Land lying fallow with species composition for biodiversity purpose:** support is cost-based EUR 50-80/ha. The maximum area per holding is 25%. Planned annual outputs from agricultural land are 3%. **Organic farmers can choose this eco-scheme but by doing so, no organic compensation is paid (EUR160/ha) nor basic AECM support (EUR45/ha).** Meaning, when choosing this eco-scheme, organic farmer loses EUR 205/ha of other supports.
3. **Green manure meadows:** support is cost-based EUR 65-95/ha. The maximum area per holding is 25%. The planned annual outputs from agricultural land are 1%. **Organic farmers can choose this eco-scheme but by doing so no compensation is paid for the area nor basic AECM support (EUR 45/ha).** Meaning, when choosing this eco-scheme, organic farmers do not get paid for it and lose EUR 45/ha of other supports.
4. **Land lying fallow with species composition for pollination, landscape, game feedstocks, meadow, or birds.** Support is cost-based 270-330 EUR / ha. The maximum area per holding is 25%. Planned annual outputs from agricultural land are 1%. **Organic farmers can choose the measure, but no organic compensation is paid (EUR 160/ha) nor basic AECM support (EUR 45/ha), nor support from minimum soil cover (EUR 30-70/ha).** Meaning, when choosing this eco-scheme, organic farmer loses EUR 235-275/ha of other supports.

Under the new CAP (2023-2027)'s second pillar AECMs, organic farmers will have access to most of the measures, like the cover crops.

Finnish organic farmers don't have an economic advantage compared to conventional farming anymore.

France

French organic movement's main concerns are the fact that organic farming will be remunerated at the same level than High Environmental Value (HVE), despite many scientific evidence and reports published during the past months prove HVE has less environmental benefits than organic farming. Organic farming will lose the previous comparative advantage they had, thus the incentive to convert to organic is weaker than in the previous CAP. Moreover, given the scheme for the maintenance of organic farming has been withdrawn, farmers won't be incentivized to convert to organic farming as they won't receive subsidies after the end of the conversion scheme (a five-year contract).

The European Commission should recognise the higher level of environmental benefits of organic farming and therefore reject the current design of the eco-scheme where organic farming and HVE are at the same level of payment.

The European Commission should recommend France to have one eco-scheme dedicated exclusively to organic farming and with a superior level of payment.

France has a target of 18% of organic farmland by 2027. Our French members advocate for 20% organic farmland for 2027, and 25% by 2030 to contribute fairly to the overall EU target.

15% of the level of payment for organic will be transferred from the first pillar to the second one. **There will no longer be any support for organic maintenance under the second pillar.**

The budget for the conversion to organic farming will be EUR 340 million per year (both FEADER and national contribution), will enable to convert 270,000 farms. To reach the 20% target of organic farmland by 2027 suggested by our members, 418,000 farms need to be converted each year. Thus, our members suggest EUR 523 million are needed each year to fund the 418,000 farms with the support of EUR 250 per hectare.

The eco-scheme for organic (both organic farmers and the ones in conversion) will be EUR 82 per hectare. Organic farmers (both for farms in conversion and those already organic) will be able to choose only one eco-scheme. But there is no incentive for organic farms because he will receive the same level of payment as conventional farmers who introduce only 3 crops in their rotation or certified HVE. Our French members advocate for an eco-scheme for organic of EUR 145 per hectare per year, which represents EUR 500 million per year.

In total, EUR 1 billion are needed per year to support 100% of certified organic farmland and reach a 20% target.

The Government chose to only maintain the support for **organic conversion**, with a maximum threshold, which is not fixed yet and will depend on regions, but it will be probably **between EUR 15,000 and EUR 20,000 per farm in a 5-year contract** (as it was organised in the CAP 2014-2020 plan).

Compared to the previous CAP 2014-2022, organic farmers will lose the comparative advantage they had, mainly because there will be no longer organic maintenance support. This loss won't be compensated by eco-schemes given organic farming won't receive a higher level of payment compared to other types of farming such as HVE.

NB: In the last months there were market imbalances, especially in the organic dairy sector.

Germany

The German organic movement is concerned by the strong inflation that will affect the price of agricultural products, including the organic ones. Regarding the CAP Strategic Plan, it is expected that the amount of money which organic farmers will receive will be lower as compared to current level (2014-2022).

The new German government pledged for a target of 30% of organic farmland by 2030 (instead of 20% for the previous government) into the Strategic Plan that was submitted to the European Commission on 21 February. The German organic movement believes **this new target is ambitious. Currently, the organic share is 11%.** Many German states have regional strategies and action plans to boost organic farming on their territories.

The new government has not yet planned to increase the budget for organic despite the new target of 30%. It is then very unlikely than the budget will enable to reach the target. Conversion and maintenance budget will remain funded under the second Pillar. Within the strategic plan, it is written that at the end of the funding period, 14% of all land shall be organic in 2027 – therefore, there is a huge difference between the promised 30% in 2030 and the actual land that is planned to be organic just three years before.

Organic farmers will have only partly access to the eco-schemes. However, **the perceived double funding issue between Eco-schemes and Rural Development measures remains with the consequence that farmers taking part in eco-scheme extension of grassland will face EUR 50 deductions in Rural Development measures (eco-premium payments). The Eco-Scheme “no pesticides application” is not accessible to organic farmers.** The biggest effect to create more advantage for organic farmers would be if deductions of Rural development measures are kept at an absolute minimum level.

According to German organic farming associations, market-related targets should be set to reach this goal (e.g., 30% organic food in public canteens of hospitals, senior homes, prisons, government agencies etc.). They also want to promote a new payment model for 2027 based on public goods and already expect more than tests at regional level.

Organic farming should be seen as a long-term sustainability compared linked to the multi-annual of organic farming practises compared to only annual sustainability measures and unsustainable practises in the next year (e.g., Eco-Scheme of no pesticide use).

Organic farming should be seen as a holistic system approach where not only some areas are cultivated sustainable, but the entire farming system is designed for sustainable practises.

Organic farming enables synergies and multi-level effects on all levels of sustainability of resources used by agriculture.

Hungary

Firstly, our Hungarian members did not have access to the submitted version of the CAP strategic plan, even though organic representatives provided comments during the consultation process. The following information is based on the previous version of the Hungarian CAP national Strategic Plan and need to be confirmed later.

Hungarian organic movement would like the national Organic Action Plan to be voted soon and to be included in the annex of the national CAP Strategic Plan. They also advocate for a clear budget the national Organic Action Plan, as well as for keeping clear numeric Key Performance Indicators (KPIs) included in its previous version. Further clear KPIs would be needed for pesticide reduction, antimicrobials reduction, and biodiversity areas share.

Officially, it has been agreed that **Hungary aims for 10% organic farmland by 2027**. An informal target of 15% by 2030 was discussed. The current share is 6%. **These targets are realistic** according to our Hungarian members.

Based on the last version of the draft CAP Strategic Plan which our Hungarian members had access to, **it seems that for 2022-2025, EUR 112 million (40 milliard forints) would be allocated for the conversion and maintenance of organic farming, which is almost triple than it was in the last cycle.**

Nonetheless it seems that the government plans to only have 1 call for organic within the next funding period (2023-2027), whereas our Hungarian members advocate for two, given that the results in this funding period were very positive for the second one (Hungary had the 10th most dynamically growing organic area (100k hectares growth) in the world in 2019 due to the second subsidy call.

On top of the organic farming scheme set under the second Pillar, **organic farmers have also access to further AECMs (Pillar II), and the new Agroecological Program (Pillar I)**. Nonetheless, **this advantage is minimal** compared to the potential which could be achieved if organic practices would explicitly include advantages in other measures such as young farmers, interventions in certain sectors, producer groups, and animal welfare.

It seems the co-funding rate of organic farmers will probably be 15% higher in certain schemes (e.g., investments are machinery and infrastructure), than the one of conventional farmers, which may be a clear advantage. However, this information needs to be verified once our members will have access to the submitted plan. **Altogether the advantage of organic can be considered a little bit higher compared to the previous CAP.**

Ireland

The Irish organic movement's main concerns are that while the draft Irish CAP Strategic Plan proposes some tweaking of existing payment rates for certain sectors, these appear not to sufficiently reflect the costs of organic production in Ireland as well as the potential opportunity costs associated with organic conversion. This can put organic farmers at a competitive disadvantage vis-a-vis Irish conventional farmers and other European organic farmers.

The most recent public draft of the Irish draft CAP Strategic Plan **set a proposed budget allocation of EUR 256 million for the organic farming scheme to reach 7.5% of organic farmland by 2027.** However, the proposed payment rates would not bring Irish organic payments in line with the EU average across all sectors. For example, in 2018, the overall spend for organic farming support payments in Ireland on a per hectare basis was about 50% below the EU average according to analysis by the Thünen Institute of Farm Economics.

The combination of environmental payments (AECMs and Eco-schemes) with organic farming payments needs to be clarified to ensure that organic farmers can make an "on-top"/additional contribution to EU goals and objectives (e.g., concerning the Nature Directives and Water Framework Directive etc). Unsubstantiated double-funding concerns must be avoided to ensure organic farmers contribute to the Farm to Fork and the European Green Deal goals and targets more broadly.

There is over three decades of evidence showing that organic farmers can effectively address multiple environmental and climate objectives, whilst at the same contributing to the production of high-quality food and supporting animal health and welfare and rural development.

The environmental contribution of organic farming can occur, within and beyond the scope of the organic standards, and is based on a **whole farm approach.** This contrasts with conventional farmers who may choose to only address individual objectives on parts of their farms.

Italy

Italy set up a 25% target of organic farmland by 2027, which is a fair target according to our Italian members. Nonetheless, a survey conducted by one Italian member recommends a target of 50% by 2030 to properly contribute to EU's overall 25% target.

The budget dedicated to organic under the second pillar will be EUR 2.5 billion for the whole CAP period (2023-2027). **The budget is higher** than during the previous CAP period (2014-2022).

There will be five eco-schemes but none for organic farming. Organic farmers will not have access to eco-scheme number 4.

Latvia

Latvian organic movement's main concerns are that the budget for organic farming will be reduced which do not incentivize current organic farmers to maintain their production under organic farming, nor other farmers to convert to organic farming.

Early 2022, the area of organic certified agricultural land reached 17% which is already almost the 18.78% (368.000 ha) target set by the Ministry of Agriculture for 2027. Thus, the target of 18.78% is not ambitious according to our Latvian member, which believes Latvia's CAP Strategic Plan lacks a focused approach to the development of organic farming in line with the strategy Farm to Fork Strategy.

At the same time, our Latvian member is concerned that the current growth rate of organic farming will slow down significantly due to a **reduced support to organic farming under the planned support system, which might want organic farmers to quit organic farming and go back to conventional.** According to their calculations, the surface of organic farmland will not reach more than 310.000 ha by 2027, which is far from the government's target of 368.000 ha.

Given other European Union countries are setting more ambitious targets for organic areas, our Latvian member believes the lack of ambitious of Latvia's CAP Strategic Plan is a threat to the future competitiveness of Latvian organic farmers and producers.

Despite the public statements of the Ministry of Agriculture regarding the increase of organic support, **organic farmers will receive less money than before.**

The current greening payment encouraging organic farming practises, will be integrated into the new eco-schemes set under the CAP Strategic Plan 2023-2027. **Common payments for organic production will decrease.** For instance, grasslands payment has been reduced from EUR 97/ha to EUR 81/ha for dairy cows and EUR 63/ha for beef cattle. The support for the cultivation of cereals, oilseeds, fodder roots, nectar and fiber plants has been reduced from EUR 117/ha to EUR 97/ha. For legumes, which are an essential part of the organic production method, the support has been reduced from EUR 97/ha to EUR 46/ha.

These reduced support rates raise serious concerns that existing organic farmers may stop farming organically, while **other farmers, getting support that is close to conventional farming, will not be motivated to convert to organic.**

Regarding AECMs, the budget for organic dairy producers will decrease by 9.9%. The support for organic crop farms will fall by 35%. The support for organic cattle sector and organic beekeeping will respectively be reduced by 29.9% and 25%.

The difficult production conditions and the increasing pollution from pesticides trigger the reduction of the number of farms in the organic sector.

The principle of the redistributive income support offer included in Latvia's CAP Strategic Plan is acceptable. However, these conditions do not ensure a fair distribution of direct payments.

Our Latvian member is concerned that the planned support for ecosystems will unequally strengthen conventional cereal farms. For example, the support for the purchase of precision technologies will only reach strong conventional farms, given that small and medium-sized farms cannot afford to purchase these technologies, nor do organic farms. **Organic farmers will not be able to apply to some environmental measures.**

Luxembourg

Luxembourg's organic movement's main concerns are that organic farming will lose support compared to the previous situation.

Luxembourg has a target of 20% of organic farmland by 2025. The government fixed 2025, because they decided this goal in 2018 and it should be manifested as a national goal beyond the next elections in Luxembourg 2023.

Until 2025, there will be an increase from EUR 2 million in 2020 to EUR 11 million in 2025. This includes support for the national Organic Action Plan (2021 - EUR 525.000, 2022 - EUR 560.000, 2023 - EUR 505.000, 2024 - EUR 405.000 and 2025 - EUR 405.000) and subsidies, not only the CAP national Strategic Plan. Our member does not know yet whether it will be enough.

One measure is that if farmers want to invest in new stables, the stables need to be organic-ready so that new farmers can convert in an easier way to organic farming.

In December, farmers associations had the last opportunity to give input to the national Strategic Plan **and discussed a way of monitoring what farmers are doing in terms of sustainability**¹⁴. Our member advocated for a **reward system** with points that would be good for all farmers, but for now it is not sure whether the Minister will have the time to include this in the plan.

With this new CAP, there is no change of thinking in terms of climate issues. In the second pillar, there will be a lot agri-environmental measures and organic farmers could compensate subsidies. Nonetheless, overall, there will be a loss. Our member suggests to have a reward system¹⁵ for farmers in the first pillar to better remunerate organic farmers.

¹⁴ Regionalwert-Leistungsrechnung and Regionalwert-Nachhaltigkeitsanalyse.

URL: <https://www.regionalwert-leistungen.de/>

¹⁵ URL: <https://www.regionalwert-leistungen.de/leistungsrechnung/>

Malta

Malta's organic movement's main concerns are the small parcel size of organic farms and the fragmented Maltese farmland, given this fragmentation leads to possible sources of contamination between parcels. The administrative burden is often perceived as long and complex and therefore dissuade farmers from converting to organic farming.

The loss of agriculture land and consequently that of farmers is extensive and this is aggravating Malta's food dependency on imports.

Due to the small economic scale of the organic sector, the payment to organic farming needs the highest available financial support to cope with this situation. The impacts of the registration of organic products and the increased costs make it very difficult for the established organic farmers and the newcomers who are in the conversion program.

Malta currently has **0.4%** farmland managed under organic practises and will reach 1% by 2030 if the growth follows a linear trend (based on 2014-2019). **Malta has a potential to reach a national target of 2% of organic farmland by 2030;** representing an annual growth of 27,9%. **The government should set a clear target for organic farmland.**

2,000 EUR were dedicated to organic in 2018 under the CAP. In average, 374 EUR per hectare per year was allocated through conversion/maintenance funding. **To reach our proposed 2% target, between 10,000 and 100,000 EUR dedicated to organic per year** would be needed in the future CAP (2023-2027)'s expenditure.

To reach 2% of organic farmland by 2030, our member suggests three axes:

- *Axis 1:* the government should procure organic products in the schools and support the creation of a central organic market where the sellers and clients meet.
- *Axis 2:* organic producers and organic processors benefit from 80% subsidization on general equipment required for farming or for processing of organic products.
- *Axis 3:* the competent certified authority in Malta (MCCAA) should waive the registration fee with the application to convert from conventional to organic. The fee EUR 540 discourages the new incomers.
- Our member suggests withdrawing any tariff for registration of organic products such as fungicides and insecticides when entering Malta given these organic products has been already registered in another EU country.
- Much Labour work is needed in the small Maltese fields. Our member suggests **for 1 hectare land there should be a subsidy of EUR 4,000 on annual basis.**
- **The eco-scheme on livestock density should be applied per one LU / acre in equivalency for the eco schemes of conventional farming.**

The Netherlands

The Dutch organic movement's main concerns are the lack of clear vision from the government to find a system rewarding farmers for their contribution to sustainable food production, even though the government is convinced that farmers are part of the solution when it comes to biodiversity and climate problems. The organic sector is hoping that the newly started Minister of Agriculture will give the organic sector a more prominent place.

The Dutch government is still working on a national organic action plan and therefore has not incorporated it in the Dutch CAP Strategic Plan. **There is no organic farmland target.**

There are high budgets for sustainable farming in general, but **no budget for organic farming.** Organic agriculture gets more attention in some regional plans. Organic farming is seen as sustainable and therefore has a comparative advantage. Organic farmers will get a competitive advantage as they will automatically comply with the eco-schemes.

The focus of the new Dutch government seems to be on regional development and finding solutions in small regions when it comes to rural development. The Dutch government is also focusing on how to better collaborate with farmers in the food chain, on social processes, as well as technological and agroecological solutions.

Organic is one of the best examples to shift agriculture towards more circularity. On top of being a verified system based on European Regulation, organic farming incorporates a compensation for the extra costs, higher animal welfare standards, no chemical crop protection, and less nitrogen emission.

Poland

Polish organic movement's main concerns are the low budget dedicated to organic which will not enable to reach the 7% target of organic farmland by 2030. The CAP Strategic Plan lacks clarity concerning the measures and budgets set for organic.

There are still some unclarities about organic support in Poland's CAP Strategic Plan. **The latest draft now mentions a national target of 7% by 2030** (in 2020 organic farmland represented 3.4% of the total agricultural land) **but, strangely, it mentions that only 3.52% of the land will be able to receive organic payments.**

The government plans to use eco-schemes for both organic conversion and maintenance.

It seems that **the budget to be allocated for organic farming (EUR 781,10 million for the whole CAP period) would enable to support only 3.52% of agriculture farmland under organic management**, which would not represent a significant increase as the country currently has 3.4% of organic farmland (but currently only 2,6% is supported by area payments for organic farming). It is unclear how additional organic farmers (to reach 7%) would be supported. The government claims that organic farming could benefit from other measures such as modernisation, but this is not a realistic prospect according to IFOAM Organics Europe members.

Our Polish members advocate for more sustainable public procurement and relevant advisory services to properly ensure the development of organic farming.

Portugal

The Portuguese Ministry of Agriculture has submitted his PEPAC (Strategic Plan for the CAP) on 30 December 2021.

Portuguese organic movement's main concerns are that both strategy and budget for organic are too low. The strategy can enable to maintain the current situation for organic, but not incentivize farmers to convert to organic nor to have a real improvement that would contribute to a better environment and health.

According to this document, **Portugal's target of organic farmland is 19% by 2027, which is too far from what Portugal can contribute** to reach the EU's overall target of 25% set in the Farm-to-Fork strategy. The document mentions a share of 8,2% of organic farmland in 2018, whereas our Portuguese member state **Portugal reached 18% in 2021**, which is the more up-to-date value that should have been taking as the starting point for setting the goals in the PEPAC.

The budget for organic farming will be **EUR 390,16 million for the whole CAP period (2023-2027)**. The support measure for organic is under the first pillar.

Organic farmers might be able to cumulate organic measures with others in the eco-schemes, as well as with environmental measures foreseen in some situations.

Slovakia

Slovakia's organic main concerns are the fact that the comparative advantage of organic farming is lower than during the previous CAP period (2014-2020), whereas the CAP should be a tool to remunerate farming practises that produce benefits on the environment and the biodiversity.

Slovakia has a national target of 14% of organic farmland by 2027, which is considered as a fair target by the Slovakian organic movement.

The budget for the whole CAP period (2023-2027) is EUR 1,360 million, which is enough to reach the national 14% target. In the new draft CAP Strategic Plan of Slovakia, the payments for conversion should be bigger than the support to maintenance.

The comparative advantage for organic is lower than the previous CAP period (2014-2020) because the payment per hectare is lower than before. Monoculture is more funded and therefore more attractive. **Organic farming cannot have access to eco-schemes because of 'double funding'**. One eco-scheme aims at decreasing monoculture (to fund less than 60-hectare field, and another one implements requirements for biodiversity/pollinators).

Spain

The main challenge for the Spanish Organic Movement is that there isn't enough budget allocated for Organic Farming in the Spanish CAP Strategic Plan.

Although there is a promotion policy for organic agricultural products, developed by the national government as a part of the national Action Plan for Organic Farming, there is no specific budget allocated in the Spanish CAP Strategic Plan.

Although the Minister of Agriculture, Fisheries and Food, has mentioned the target of reaching the 25% of agrarian surface in 2030 in some of his declarations, **the target has not been officially established. The budget allocated for organic farming for the entire CAP period 2023-2027 and for the set of all the regions of the state is EUR 752 million and won't even be enough to maintain the area that is currently managed by organic production systems in Spain.** According to the study carried out by IFOAM Organics Europe 'Prospects & Developments for Organic in National Cap Strategic Plans'¹⁶, the budget necessary to support the current growth trend of the organic area with which we would reach 15.7% of the SAU in 2030, would require an annual financing of EUR 693 million. **In the case of wanting to meet the European objectives and reach 25% of the SAU in 2030, we would need EUR 1,100 million per year.**

Regarding eco-schemes, the Spanish CAP Strategic Plan has established that each beneficiary can only access to one single eco-scheme and, seeing the proposed eco-schemes it seems that almost every farmer will have access to one of them, so the comparative advantage between organic farming and conventional farming is low.

In addition to this, so far, it is not clear whether regional competent authorities will consider double funding when an organic farmer wants to apply for certain eco-schemes, as the Regulation for organic farming already includes sustainable practices funded through eco-schemes, such as sustainable use of pesticides, fertilization, etc. And another threat concerns eco-schemes related to reduction in the use of environmental harming products: farmers will be eligible if they can prove a reduction of use in comparison to the previous year, there is no compensation provided for those that have already minimised the use of pesticides or don't use them at all, which penalized organic farmers.

¹⁶ URL: [ifoameu_advocacy_CAP_StrategicPlansAnd25Target_202106.pdf](https://www.ifoameu.org/advocacy/CAP_StrategicPlansAnd25Target_202106.pdf) ([organicseurope.bio](https://www.organicseurope.bio/))

Sweden

Swedish organic movement's main concerns are the lack of climate ambition due to strong voices saying there is no proof that organic farming is a solution to address climate change. Swedish authorities have added comments on organic production in the pre-evaluation such as "organic farmland should not be increased more before we know that its climate effects due to lower produce per hectare is further cleared out".

For the same reason, organic farmland is not used as an indicator for "more climate friendly farming practices" and similar outcomes related to climate change. There are strong powers advocating that organic farming is even worse for the climate than conventional farming because of low production.

The incentives to use climate friendly methods such as less nitrogen fertilizers and capture carbon in the soils are today decreasing. For instance, there are less incentives to have ley and multiannual crops in the rotations today, compared to the previous CAP period (2014-2022). There will no longer be any support for organic grasslands, ley, and pastures.

The Swedish organic movement is also concerned by the non-reallocation of funds from large to smaller farms.

There is no target in the CAP Strategic Plan, but the plan relates to the national government's, not the Parliament, target of 30% organic farmland by 2030, as well as to the overall target in the national food strategy. The target is agreed by the whole parliament, stating that all food production in all areas should increase.

According to our members, the budget allocated in Sweden's national strategic plan is around EUR 68,233,856 on average per year. There are no details yet of the budget per measure. This budget represents around EUR 800,000 more per year compared to 2020. Our members calculate with a yearly increase in organic farmland, but without reaching the goal of 30 % of the farmland. Most probably, the eco-schemes will be constructed so that the budget can vary +/- 10 % per year depending on how many farmers apply, and it will also be possible to reallocate budget between the different schemes. This makes our Swedish member quite confident that the funding will be solved if Sweden reaches the target of having 30 % farmland by 2030.

However, organic farming has less comparative advantage than before compared to conventional farming. Most of the organic dairy-, beef- and lamb producers that maintain natural pastures, around 91 % of the organic farms with ruminants, **get decreased organic support because the grasslands are taken away as a ground in the organic support for animals per hectare.** In general, pastures get more support, but for organic farmers the best case will be status quo since the organic support at the same time decreases for these farmers. **The organic movement in Sweden fears a risk of losing organic farmers and farmland because of this, in combination with low market prices on organic dairy and beef.**

Organic farmers have access to other eco-schemes, apart from organic farming support, that is now constructed as a proper eco-scheme as well.

Evaluation of the support for organic in non-EU countries

Switzerland

Equivalent rules for organic farming and therefore free trade of organic goods between Switzerland and EU is guaranteed by a bilateral treaty (with certain quantitative limits within WTO-regulation). Bio Suisse as the single national organisation **supports a national target of 25% organic by 2025**, against a current share of 16.5% (2020).

In Switzerland, **there are not political objectives on the share of organic farmland and there is no national framework for Organic Action Plans** although there were considerable political efforts a few years ago. **Nevertheless, there are quite a few regional Organic or Climate Action Plans being realised on regional (cantonal) level.**

In 2021, there was a vote on banning synthetic pesticides: the YES received 39.4%. Therefore for the coming few years, **popular initiatives or political motions for considerably more organic products are given little chance for success.**

Actually, there is little change planned in upcoming Agricultural policy 2022+ which has been suspended for an indefinite time. Nonetheless, our Swiss member is lobbying for having more support for organic agriculture to ensure the benefits from a comparative advantage compared to other types of farming. E.g. Switzerland has signed the Paris Agreement to become carbon neutral in 2050. Organic farming and consuming is one solution to address climate change and achieve several other national objectives.

The United Kingdom

Our British member OF&G is pleased to see agri-environment schemes that encourage farmers towards greater environmental protection. However, with these schemes due to be rolled out over the next few years they would have expected more detail such as where a farmer would be able to access more than one of the schemes on offer simultaneously.

In the United Kingdom, there is no target for organic farmland.

Since last year, our British member OF&G has been working with other organic sector organisations to progress discussions with the farming ministry, DEFRA, to put an organic scheme in place. DEFRA have now recognised that organic has the potential for 'earned recognition'. Our British member is engaging in several activities around the schemes being designed with a number of projects within DEFRA's Test & Trials programme¹⁷.

Our British member suggests DEFRA create a strategic framework to gather all the schemes with a layered system. Organic farmers should be able to be paid for organic practises and combine this with payments for ecosystem services.

The current 'Countryside Stewardship'¹⁸ set of agri-environment schemes will continue to 2024 and there has been some indication from DEFRA that extensions may be granted up to one year. This is yet to be confirmed.

The three new schemes that reward environmental land management and animal welfare¹⁹ are:

- **Sustainable Farming Incentive²⁰**: is intended as an entry level scheme for all farmers. It gathers 8 standards in the pilot: arable and horticultural land, arable and horticultural soils, farm woodland, hedgerows, improved grassland, improved grassland soils, low and no input grassland, and water body buffering. The scheme started piloting in 2022, and launch in 2024.
- **Local Nature Recovery**: will pay for actions that support local nature recovery and meet local environmental priorities. The scheme will encourage collaboration between farmers, helping them work together to improve their local environment. The scheme started piloting in 2022, and launch in 2024.
- **Landscape Recovery**: it will support landscape and ecosystem recovery through long-term projects, such as: restoring wilder landscapes in places where it's appropriate, large-scale tree planting, peatland and salt marsh restoration. The scheme started piloting around 10 projects in 2022, and launch in 2024.

DEFRA has told our member they consider organic would do well under the Local Nature Recovery and Landscape Recovery schemes. Our member recognises this, however at this time our member has not been able to ascertain how any outcomes would be monitored and how they would be evaluated.

Late 2020 / early 2022, the UK also launched 4 research and development programmes to develop innovation opportunities in agriculture and horticulture.²¹

¹⁷ URL: <https://www.gov.uk/government/publications/environmental-land-management-tests-and-trials>

¹⁸ URL: [Countryside Stewardship - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/countryside-stewardship)

¹⁹ URL: [Environmental Land Management schemes: overview - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-land-management-schemes-overview)

²⁰ URL: [Sustainable Farming Incentive pilot - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sustainable-farming-incentive-pilot)

²¹ URL: [New agriculture and horticulture innovation opportunities - Future Farming \(blog.gov.uk\)](https://www.gov.uk/blog/new-agriculture-and-horticulture-innovation-opportunities)



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