

**Involvement of civil society  
organisations in drafting of CAP  
Strategic Plans**  
*Experience of BirdLife network*

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CDG on CAP, 13.10.2020

# BirdLife and CAP strategic plans

- BirdLife network actively engaged in CSPs preparation across EU
- We analysed the stakeholder process with focus on involvement of ENGO in 20 countries (21 CSPs)

# What we analysed

1. Modalities of the consultation process and clarity on the formal consultation process
2. Involvement of ENGOs in the consultation process and balance of representation of various interest groups
3. Conditions for effective participation and transparency with consultation documents
4. Feedback and transparency on the input from stakeholders
5. Support to civil society and capacity building

# Summary of our findings

- In several countries the consultation process is not clearly and formally set up or communicated
- In 2 countries ENGOs are not invited to stakeholder meetings, in most countries they are underrepresented
- Often the outcomes from stakeholder meetings are not communicated to participants, and minutes do not represent the discussion or are biased.
- Document for comments are often circulated late and with short deadlines for comments, in some case some documents are provided only to some stakeholders
- Stakeholders are often not getting feedback on their input, and member states in general do not justify their decisions
- In most member states an effective institutional support for civil society organizations is missing

# Good practice (rather exceptional)

- Clear roadmaps published by some MSs
- ENGO well represented and involved in a few MSs
- In some countries, it is obligatory to provide feedback on input and justify decisions
- Use of modern and effective approaches to get feedback from stakeholders (password-protected online tools, templates for collecting feedback)
- Some useful and well organised workshops with stakeholders

# Recommendations to Member states

- Outline and communicate the formal consultation process (a roadmap)
- Make all documents that are subject to consultation by stakeholders easily and timely available to them
- Provide feedback on input from stakeholders and provide justification in case the input is not taken on board;
- Produce reports from stakeholder meetings and thematic workshops, and make them publicly available;
- Put in place an effective and transparent support system aiming to strengthen an institutional capacity of NGOs

# Recommendations to EC

- Set minimum standards that define principles and modalities for the involvement of partners, and make the compliance with them a criterion for the approval of the CSPs;
- Share best practices identified in member states and provide further guidance to member states as required;
- Be proactively transparent about structural dialogues with member states on CSPs and set up a contact point at the EC geographical hubs for stakeholders
- Publish recommendations to member states and criteria for the adoption of CAP strategic plans;
- Publish the draft CSPs and consult stakeholders on their essential elements before they are approved
- Encourage Member states to use technical assistance or other resources for strengthening of the institutional capacity of civil society organisations.



Partnership for  
**nature** and **people**

Thank you!

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# Irish Cap Strategic Plan

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MACRA NA FEIRME PRESIDENT

THOMAS DUFFY

# Snapshot of Ireland's agriculture

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Export driven food production system – food represents 10% of Irish merchandise exports

137,000 farms, vast majority single family operations – primarily beef and dairy

€14.5 billion in exports to 180 markets in 2019

Atlantic Temperate Climate – rains 200+ days a year on average



# CAP Consultative Committee – Facilitated by the Department of Agriculture

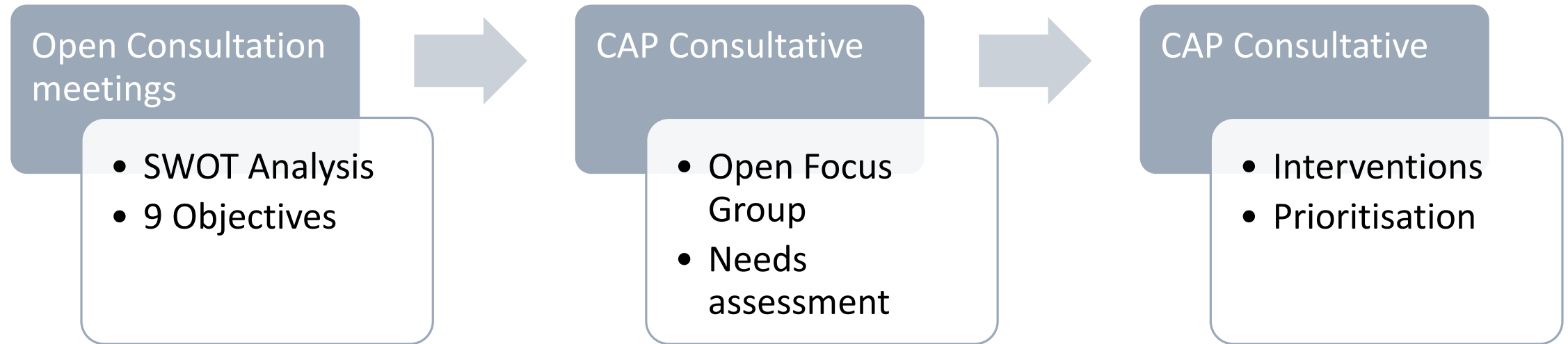
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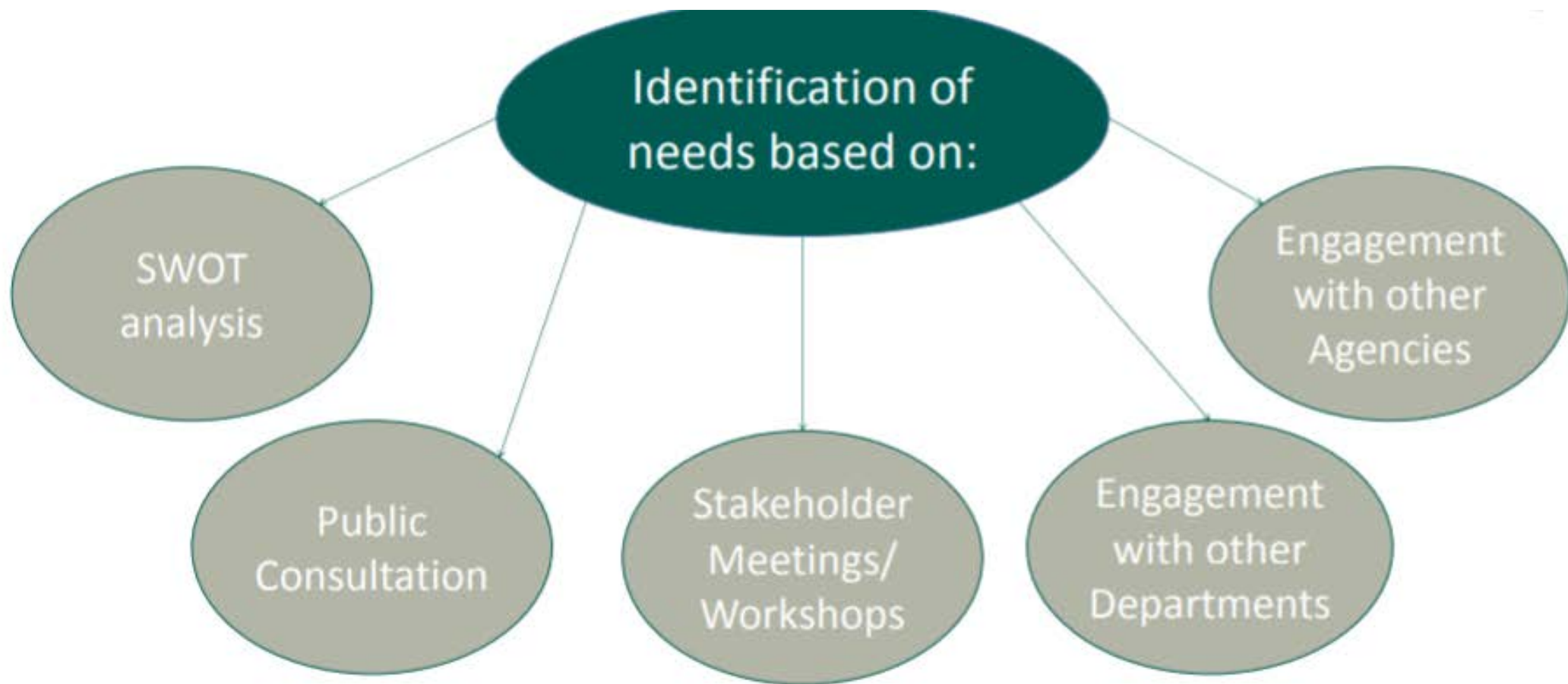
Drawn from

1. Farm organisations – representatives of young farmers (Macra na Feirme), cross sectoral groups, dedicated dairy and livestock groups
2. Environmental Groups – representatives from biodiversity organisations, heritage organisations, water protection organisations, Organic governing organisation
3. Other rural interests – rural community organisations, representatives for female entrepreneurs
4. Consultant and education representatives – national research body, independent consultants representatives
5. Government bodies responsible for protection of the environment

# Process

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# Needs Assessment - Objectives

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Development of 39 needs and how they address the Objectives

Including

1. Diversification on and off farm to support family farm income
2. Risk management and Financial Planning
3. Improve soil health
4. Protect and improve water quality
5. Effective mechanism to increase the number of young farmers

Etc, etc...

# Experiences

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## POSITIVE

Wide ranging consultation

Multi-factoral approach to problem solving

Transparency

## NEGATIVE

Competing interests

Problem of definitions of problems

Limited scope on some items/overlap with other processes

Interventions/Indicators



**Current process:**



Identifying the interventions to achieve multiple specific objectives under the general headings of CAP



# Corresponding processes

Agri Food 2030 Strategy – National Strategy for  
the next 10 Years

Climate Bill Compliance – Individual Sectoral  
GHG Reduction Targets including Agriculture



Thanks for  
listening

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ANY QUESTIONS



Presentation on the CAP Strategic Plan  
preparation - state of play in the Member  
States – the case of Germany

Udo Hemmerling

Chairman of the Working Party on  
Direct payments and greening

13/10/2020

**copa**\***cogeca**  
european farmers      european agri-cooperatives

# DE: CAP implementation in a federal state

- \* DE: Federal level legislation on first pillar, regional decision on second pillar
- \* Preparation of strategic plan by administration
  - \* Online Meeting with 120 participants
  - \* Draft SWOT analysis
  - \* Draft requirement analysis
  - \* Draft interventions list
- \* Preparation of national implementation law with (at least) 15 decision points
  - \* Probably decision making during national election campaign 2021



# DE: CAP Implementation in a federal state

- \* Transfers between Pillars (now 6%/future ??)
- \* GAEC 9+8: Waiting for Brussels decision
- \* Eco -Schemes  
(first draft:extra set -aside and (flower/field) strips)
- \* No re -establishment of “active -farmer” control
- \* Abolish premium entitlements
- \* Capping/ first hectares: Go on with current first hectares/no capping
- \* Coupled support: Fed. government “No” - Green state governments “possible for sheep/goats”



# CAP SP in DE: Conclusions

- \* In reality two combined processes: strategic planning and political law decision making
- \* Intensive information exchange in farmers associations is crucial
- \* Participation can only be done if resources are existing



# SPAIN'S CAP STRATEGIC PLAN

# Spain's CAP Strategic Plan- State of play



Steps	Date of starting	Date of completion	Planned date for completion
1. SWOT analysis	April 2019	January 2020	
1. Assessment and prioritization of needs	February 2020	Still ongoing	October 2020
1. Strategic Environmental Assessment	March 2020	Not yet	January 2021
1. Ex-ante evaluation	March 2020	Still ongoing	
1. Drafting of the CAP Strategic Plan	January 2021	Not yet	March 2021
1. Submission of CAP Strategic Plan	January 2021	Not yet	March 2021
1. Formal presentation of CAP Strategic Plan	October 2021	Not yet	December 2021



# Spain's CAP Strategic Plan- State of play

Competent Authority: MAPA (Ministerio de Agricultura, Pesca y Alimentación)

Participatory actions:

(Bilateral) Meetings between MAPA and:

- ✓ MITECO (Ministerio para la Transición Ecológica y Reto Demográfico)
- Farmer's Organizations and Cooperatives Confederations
- ✓ Environmental NGOs being part of the G5 (WWF, SEO-Birdlife, Greenpeace, Friends of the Earth, Ecologistas en Acción)
- ✓ Regional Competent Authorities

play

Roadmap published at:

<https://www.mapa.gob.es/es/pac/post-2020/cronograma-de-trabajo.aspx> (only updated recently).

SWOT Analysis for each objective was published at:

<https://www.mapa.gob.es/es/pac/post-2020/objetivos-especificos.aspx>

But during the process working documents weren't available, so participating in the building process was very difficult. Even NGOs that are part of the G5 had to ask the Ministry for the documents to be able to review them and prepare the amendments.

**Assessment of needs** for each objective have also published, but some documents haven't been updated, as for Specific Objective 6.

**Prioritization of the needs** hasn't been published.

# Spain's CAP Strategic Plan- Positive aspects



- ✓ Some environmental NGO's have been invited to the discussion (G5)
- ✓ The Competent Authority on environmental aspects is being consulted
- ✓ An e-mail account for ammendments and proposals was created



# Spain's CAP Strategic Plan- Negative aspects



- ✓ The Organic Sector hasn't been included in the discussions
- ✓ Neither the definition of the SWOT Analysis nor the discussion on the Assessment of needs have been transparent for civil society and stakeholders:
  - ❖ working documents weren't made public
  - ❖ and even for those organizations that could ask for them from the Ministry, the timelapse given for amendments was usually of just a few days.
- ✓ The Assessment and Prioritization of needs' process has been based on a set of unclear statements instead of a solid and open definition of what was being proposed or asked.



# Proposals for improvement from the civil society



- ✓ We ask the Commission to be more explicit on the public consultation requirements on transparency and participation in the Regulation for the CAP Strategic Plans.
- ✓ We ask MAPA:
  - ❖ To reopen the revision of the SWOT analysis documents and make them available and accessible to all.
  - ❖ To restart an Assessment and Prioritization of needs' process based on a solid and open definition of what is being proposed.
  - ❖ Start a transparent and participatory process that includes the organic sector and is open for all stakeholders and all representatives of civil society organizations, to design the proposals of measures for Eco-Schemes, Second Pillar's Environment and Climate Measures, etc., to make sure we meet the Goals for the FF2E and Biodiversity



Thank you very much!!

SEAE -Sociedad Española de  
Agricultura Ecológica/Agroecología

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# CAP Strategic Plan Portugal



# 1. Portugal CAP Strategic Plan - State of play

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**Managing Authority:** GPP

**Actions taken:**

- Inter-ministerial meetings
- Bilateral meetings between GPP and a group of academics, agricultural confederations and ENGOS
- CAP SP preparatory documents shared privately: diagnosis, SWOT analysis, main goals and roadmap
- Contributions sent by each of the consulted entities

**Actions to be taken:**

- Publication of preparatory documents (after stakeholders contributions) for public consultation (early October)
- Definition of support measures (1st draft in April 2021)

**Other actions:**

- Ex-ante evaluation? (2nd half of 2020)
- Strategic Environmental Assessment?





## 2. Stakeholders being involved

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- CAP Review Monitoring Council:
  - group of experts (agriculture academics)
  - commission of representatives (agricultural confederations)
- ENGOs:
  - C6 (coalition of 6 ENGOs)
- Uncertainty about the involvement of other entities in specific stages of the process:
  - GPP reference to the participation of various sectoral associations for the definition of support measures

### 3. Positive experiences

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- Involvement of ENGOs (C6) for the first time in the analysis of CAP SP preparatory documents before being submitted to public consultation
- Proactive bilateral meetings of ENGOs (C6) and agricultural confederations to discuss CAP SP
  - Objective: to reach joint positions to pressure the government to adopt certain measures

## 4. Negative experiences

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Government entities control the entire process:

- no participatory stakeholder involvement
- short deadline for proper analysis of shared documents
- documents contain several errors and lack of information
- no response after contributions from stakeholders
- uncertainty of how contributions will be integrated
- lack of clarity about the entities actually involved
- no discussion of the different points of view between the various stakeholders
- stakeholders are not aware of each others' contributions to the process.
- no willingness to make the process more participatory and collaborative

## 4. Negative experiences

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Government entities control the entire process:

- little information available to the public and lack of clarity about the steps of the process
- quantified objectives are lacking in the planned strategic interventions
- the process is not predictable (no meetings subsequent scheduled) or structured (we are only asked to give comments to already very long and final documents)
- GPP is organizing closed door thematic workshops in the context of the CAP SP and the bioeconomy strategy (fisheries & aquaculture, agriculture and livestock, forestry) and as far as we know only our NGO was invited to attend one of the workshops (fisheries & aquaculture)

## 5. Proposal/approaches for improvement

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The stakeholder involvement process must be reformulated:

- Government agencies should promote a set of open door workshops or create working groups where different types of stakeholders can discuss specific CAP SP topics
  - A broader set of stakeholders must be involved in it
- These workshops / working groups should produce documents with proposed measures for AECMs, eco-schemes, etc., which should be made available as they are made and submitted to public consultation
- The process should have a clear timeline and structure
- All the information should be made publicly available.
- The articles of the Commission's proposal for the CAP SP regulation should be more explicit on the public consultation requirements, otherwise there is no push to make the process more open, transparent and participatory.