



**Copa-Cogeca's reaction to the  
Commission's legislative proposals on  
the Future of the CAP 2014-2020**

# Main message of Copa-Cogeca

**If European agriculture & the CAP can ensure:**

- food security & stability in an increasingly uncertain world
- & contribute to greater growth & employment
- & do it in a sustainable way

**Cost of the CAP – less than 1% of total EU public expenditure – is an excellent investment**

**To achieve this we must make agriculture a more dynamic, innovative and profitable sector with better returns from the market**

# Redistribution of pillar 1 national envelopes

Commission is moving in right direction but level of hectare payment will still be significantly lower than EU average in several MS

## **Copa-Cogeca calls for:**

- fair and equitable treatment of all farmers, taking into account differences in conditions

# Direct payments – convergence to a national/regional flat-rate

Commission's proposals will have extremely adverse effect on some farmers and on production capacity in some MS

## **Copa-Cogeca calls for:**

- **no front-loading** – must be phased in gradually
- MS must have **more time and flexibility** to help farmers adversely affected to adapt

# Direct payments – active farmers

Copa-Cogeca supports Commission's proposal to target direct payments to active farmers but

Commission's definition will require complex administration

## **Copa-Cogeca proposes that:**

- Member States choose most appropriate way to target payments - based on an EU indicative list criteria

# Direct payments - capping

Commission's proposal to cap payments will penalise farmers who have improved their farm structure and will be a disincentive to further modernisation

- + more administrative burden
- + mitigation proposal takes account of salaries but not family or contract labour
- **Copa-Cogeca rejects capping**

# Greening

## **Commission proposal runs counter to need for food security & growth:**

- restricts production, reduces farmer's ability to respond to market signals (7% environmental focus area – freeze in permanent grassland)
- too rigid, not practical (e.g. 3 crop requirement for small, specialised farms or where climate/agronomic factors do not permit)
- will lead to higher costs, higher food prices or increase dependence on imports
- **+ an inefficient way to get environmental benefits**

# Copa-Cogeca wants an alternative form of greening

**green growth measures** – which give environmental benefits but also maintain production capacity

**choice** - farmers should be able to choose the measure most appropriate for their farm situation from an EU list of measures

**voluntary** – farmers not undertaking greening measures should only forfeit the greening payment

**greening payment** - should represent less than 30% of national envelope



# Cross compliance

Commission's proposals mean a significant reinforcement of cross compliance in addition to greening

## **Copa-Cogeca calls for:**

- real simplification of cross compliance
- renaming of obligatory requirements – “*EU agricultural production standards*”
- more harmonisation at EU level

# Coupled payments

**Copa-Cogeca** supports Commission proposal to maintain the possibility for MS to make limited coupled payments but

- Member States should be free to identify which sectors
- Commission should ensure distortions to competition kept to a minimum

# Single CMO

## **Copa-Cogeca:**

- safety nets need to be reinforced & updated
- measures in sugar sector must be maintained at least up to 2020
- wine planting rights must be maintained
- crisis reserve must have capacity to release funds rapidly & effectively + transfer unused funds to following years

# Rural Development

**Copa-Cogeca** agrees with main thrust of Commission proposals but:

- calls for ERDF to be refocused on agriculture
- new challenges require new article linked to 5<sup>th</sup> priority to promote green growth measures e.g. resource efficiency, climate resilience...
- ensure no overlap between agri-environment measures and greening under 1<sup>st</sup> pillar
- risk management –supports new income stabilisation tool but must also improve effectiveness of current risk tools
- need additional sub-programme to better integrate women

# Reinforcement of farmers in food chain

Commission proposal to extend product coverage for recognition of POs is welcomed but

## **Copa-Cogeca calls for additional measures:**

- more precise definition in EU legislation of criteria for recognising a PO & tasks assigned to them
- assurance that existing Coops & POs are not undermined
- guarantee of legal certainty viz. Community competition law to facilitate consolidation of Coops & POs
- elimination of unfair & abusive practices in the food chain

# Payments to farmers in areas with natural constraints

**Copa-Cogeca** concerned that splitting support to LFAs between pillar 1 & 2 could complicate LFA payments unnecessarily

- MS which choose to give top-up under pillar 1 must have objective grounds for doing so &
- ensure it does not lead to additional bureaucracy for farmers or incoherence between the pillars
- LFAs – delimitation of LFA's should be based on European Parliament's & Copa-Cogeca's proposals

# Simplification

Commission proposals will lead to additional administrative burden for farmers, not less

e.g. its proposals on cross compliance, greening, capping, definition of active farmers, splitting of the 1<sup>st</sup> pillar ...

## **Copa-Cogeca:**

- if a proposal does not result in simplification it must be reworked

# Rural development measures





## The Commission legislative proposal:

- The New RDP measures are defined according to types of support and beneficiary rather than according to priorities (e.g. Investment support or area-based payments support, farmer beneficiaries or other business beneficiaries etc)
- Blend of old and new measures
- Aims to more efficiency and better reflection of priorities for RDP as well as cross-cutting themes of innovation, climate change and environmental care



- The number of measures is less than currently because many measures are combined
- No measure is "priority-specific"! Up to MS / regions to decide which measures to use to serve a given priority.
- Some measures are clearly relevant for several Union Priorities
- More emphasis will be on the use of these new measures in combination as many or even most priorities and targets cannot be met through the use of one measures alone!



# Special attention to special cases – “sub-programmes and higher aid intensities”

In addition to the standard programme-based structure, MS and regions are given the opportunity to offer special support to certain groups, areas or objectives, if they wish.

Particularly:

- Young farmers
- small farms
- Mountain areas
- Short-supply chains



Where most work needs to be done? Which measures have to be developed? How?



# Definitions and objectives

## Article 2: Definitions

Copa-Cogeca considers that specific measures should be available to women farmers under this regulation (see proposals under Article 8).

<p>2. For the purposes of this Regulation, the following definitions apply:</p>	<p>2. For the purposes of this Regulation, the following definitions apply:</p> <p><b>New (u)bis:</b></p> <p><b>“woman farmer” means a natural female person who exercises an “agricultural activity” within the definition under Regulation (EU) No DP/2012</b></p>
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# Objectives

## Article 4: Objectives

The economic potential of forestry in terms of growth and employment should be taken into account in the objectives, particularly given forestry's role in the green economy and the Lisbon 2020 objectives.

<p>Within the overall framework of the CAP, support for rural development shall contribute to achieving the following objectives:</p> <ol style="list-style-type: none"><li>1) the competitiveness of agriculture;</li><li>2) the sustainable management of natural resources, and climate action;</li><li>3) a balanced territorial development of rural areas.</li></ol>	<p>Within the overall framework of the CAP, support for rural development shall contribute to achieving the following objectives:</p> <ol style="list-style-type: none"><li>1) the competitiveness of agriculture <b>and forestry</b>;</li><li>2) the sustainable management of natural resources, and climate action;</li><li>3) a balanced territorial development of rural areas.</li></ol>
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# Union priorities

**Article 5: Union Priorities for Rural Development**  
Enhancing the competitiveness of forestry should be a Union priority for the reasons given under Article 4 above.

<p>2) enhancing competitiveness of all types of agriculture and enhancing farm viability, with a focus on the following areas:</p> <p>a) facilitating restructuring of farms facing major structural problems, notably farms with a low degree of market participation, market-oriented farms in particular sectors and farms in need of agricultural diversification;</p> <p>b) facilitating generation renewal in the agricultural sector</p>	<p>1) enhancing competitiveness of all types of agriculture and <b>forestry</b>, enhancing farm viability, with a focus on the following areas:</p> <p>a) facilitating restructuring of farms facing major structural problems, notably farms with a low degree of market participation, market-oriented farms in particular sectors and farms in need of agricultural diversification;</p> <p>b) facilitating generation renewal in the agricultural sector</p>
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# Rural development programmes

## Article 7: Rural development programmes

Copa-Cogeca is concerned that, in some cases, a regional approach may lead to an increase in insurance premiums or affect the sustainability of mutual funds since these are sometimes set up across regions in order to spread the risk over a wide geographical area.

<p>3. Member States with regional programmes may also submit for approval a national framework containing common elements for these programmes <del>without a separate</del> budgetary allocation</p>	<p>3. Member States with regional programmes may also submit for approval a national framework containing common elements for these programmes with <b>a single national</b> budgetary allocation</p>
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# Sub programmes

## **Article 8: Thematic sub-programmes**

Copa-Cogeca call for an additional sub-programme aimed at ensuring **women farmers** play a more integrated role in developing innovative agricultural production and related activities.

Copa-Cogeca recognises the urgent need to attract **young entrants** into farming. Given that the major obstacle for young farmers is often the lack of access to capital it may be more appropriate to give additional encouragement to young farmers under pillar 2, rather than under pillar 1. Copa-Cogeca therefore considers it should be mandatory for Member States *either* to apply an annual top-up to direct payments to young farmers under pillar 1 *or* to set up a specific sub programme for young farmers, with higher maximum support rates, under pillar 2 (while not excluding them from doing both if they wish).

# Knowledge transfer and information

## **Article 15: Knowledge transfer and information actions**

Support should be extended to cover forestry exchanges, visits and knowledge transfer.

Support should be in the form of a voucher provided to users of courses , training etc. in order to ensure a demand oriented approach. Both the provider and the farmers should have the possibility be the beneficiary of the support.

# Advisory services, farm management and farm relief services

## **Article 16: Advisory services, farm management and farm relief services**

Advice should cover marketing of produce.

The farmer should be supported via the provision of a voucher enabling him or her to choose the provider of advice or training.

Access to training and advisory services, for production techniques as well as marketing, is a key factor in the development of organic farming. Therefore, it is important that organic producers are granted access to training and advice relating to this type of production

Support should be extended to cover specific costs incurred by farmers engaged in short supply chains, direct sales or local sales initiatives. e.g. farmers undertaking processing may require training in food hygiene legislation.

# Quality schemes

## **Article 17: Quality schemes for agricultural products and foodstuffs**

Producer groups and producer organisations, such as agricultural cooperatives should also be able to benefit under Article 17 to help them to cover the costs associated with the development of certification schemes through a collective approach e.g. providing advice for and assisting with the implementation of measures put in place by producers, administrative support with managing the scheme, internal audits.

Copa and Cogeca also believe that the maximum duration of support should be extended to 7 years. Member States should have the flexibility to extend the period of support to seven years in determine the specific cases where this would be beneficial.

## **New article 17bis: Meeting standards based on Community legislation**

Copa-Cogeca regret the removal of the option for financial compensation for the cost of meeting standards based on community legislation (proposed removal of Article 31 of the current regulation). It is important to support the efforts made by farmers to comply with the high production standards laid down in EU legislation.

**1. Support provided for in Article 20(c)(i) shall contribute partly to costs incurred and income foregone caused to farmers who have to apply standards in the fields of the environmental protection, public health, animal and plant health, animal welfare and occupational safety. These standards must be newly introduced in national legislation implementing Community law and impose new obligations or restrictions to farming practice which have a significant impact on typical farm operating costs and concern a significant number of farmers.**

**2. The support shall be granted as a flat-rate, temporary and degressive aid on an annual basis, for a maximum duration of five years from the date the standard becomes mandatory in accordance with Community legislation. Support shall be limited to the maximum amount laid down in the Annex**

# Investments in physical assets

## Article 18: Investments in physical assets

Aid should be available to holdings regardless of their size. To limit purely on the basis of size is discriminatory.

<p>2. — Support under paragraph 1(a) shall be granted to agricultural holdings. In the case of investments to support farm restructuring, only farms not exceeding a certain size, to be defined by the Member States in the programme based on the SWOT analysis carried out in relation to the Union priority for rural development “enhancing competitiveness of all types of agriculture and enhancing farm viability”, shall be eligible.</p>	
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# Promotion of Green Growth on farms

## **New Article 18 bis: Promotion of Green Growth on farms**

The fifth Union priority under Article 5 is entitled '*Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in agriculture, food and forestry sectors*'. In other words promoting green growth – measures which support the integration of environmental protection in the production process in a way which maintains production capacity and contributes to efficiency and productivity. The aim of the new European Innovation Partnership under Title IV is also to achieve agricultural productivity and sustainability. Yet there is no specific measure to promote green growth in the Commission's proposals. Copa-Cogeca believes that achieving green growth will be the major global challenge of the future if world food demand is to be met in a sustainable way. The inclusion of a specific measure is also important in order to alert farmers of the importance of integrating environmental considerations into their attempts to improve productivity. This measure contrasts with agri-environmental measures which are aimed at encouraging farmers to provide additional environmental services in their role as land managers and may even reduce production capacity and/or productivity.

# Promotion of Green Growth on farms

## **New Article 18 bis**

### **Promotion of Green Growth on farms**

**1. Support under this measure shall be granted to support investments or cover additional costs incurred by farmers, or groups of farmers, who carry out operations to:**

- a) increase resource efficiency (including nutrient efficiency, efficiency in the use of plant protection products, water efficiency and reduced wastage)**
- b) reduce GHG emissions**
- c) improve carbon sequestration in agricultural soil**

**2. Member States shall endeavour to provide farmers undertaking to carry out operations under this measure with the knowledge and information required to implement them, including commitment-related expert advice.**

**3. Support shall be limited to the maximum amounts laid down in Annex 1.**



## **Article 20: Farm and Business Development**

In line with Copa-Cogeca's motivation for putting forward an amendment under article 8, Member States should be able to improve young farmers' access to capital.

## **Article 22: Investments in forest area development and improvement of the viability of forest**

Sustainable management of forests is already ensured by national forestry laws. The requirement of management plans therefore merely adds a further layer of red tape.

# Setting-up of producer groups

What's new? Extended to all Member States

Limited to groups which classify as SME's

- 6 May 2003 Recommendation 2003/361/EC regarding the SME definition (replaced Recommendation 96/280/EC as from 1 January 2005)  
Enterprises qualify as micro, small and medium-sized enterprises (SMEs) if they fulfill the criteria laid down in the Recommendation
- In addition to the staff headcount ceiling, an enterprise qualifies as an SME if it meets either the turnover ceiling or the balance sheet ceiling, but not necessarily both.

<b>Entreprise category</b>	<b>Headcount</b>	<b>Turnover</b>	<b>or Balance sheet total</b>
Medium-sized	< 250	≤ € 50 million	≤ € 43 million
small	< 50	≤ € 10 million	≤ € 10 million
micro	< 10	≤ € 2 million	≤ € 2 million

# Setting up producer groups

## **Article 28: Setting up producer groups**

There should be no delimitation to support to producer groups which are SMEs only.

In order to ensure the successful creation or expansion of existing forest cooperatives, the funding period should be extended from 5 to 10 years.

# Agri-environment-climate (1/2)

## Article 29 : Agri environment - climate

Farmers who have to comply with mandatory environmental measures at national level which go beyond EU standards should be **entitled to compensation for additional costs** they bear compared with their competitors on the Single market.

It should be possible to set the **commitment period for each individual agri-environment measure separately**. The period of five years is not optimal for all AEM.

Copa-Cogeca supports the proposal to make AEMs more attractive by deducting transaction costs from the premiums granted. However, this should be calculated as a lump-sum.

## Agri-environment-climate (2/2)

In order to avoid financial losses for farmers when participating in agri-environment-climate change schemes it is absolutely necessary to **compensate all costs incurred and/or income forgone**. Otherwise participation on voluntary basis is put under risk.

Regardless the land included in group commitments every farmer has additional costs when engaging in them. In order to avoid disadvantages of farmers with small shares of land included into the commitment it is **necessary to define a minimum lump sum**. Otherwise there is a risk that such commitments will only be taken up by farmers with significant agricultural land being eligible for the specific agri-environmental-climate scheme.

# Organic farming

## Article 30 : Organic farming

Farmers who decide to convert to organic farming practices should be entitled to **compensation for all the additional costs they have to bear during the transition period.** In particular as during the transition period (first three years) they have to continue to sell their produced commodities as conventional products.

In addition, access to training and advisory services, for production techniques is a key factor in the development of organic farming. Therefore, it is important that **organic producers are granted access to advice in particular relating to this type of production.**

# Natura 2000 and Water framework directive payments

## **Article 30: Natura 2000 and Water framework directive payments**

The link to the specific Water Framework directive paragraph under cross compliance was taken out in order to align this article with the amendment made on Article 93 of the monitoring and financing proposal.

In order to avoid that only changes that from environmental perspective are considered major can be covered by this article this reference has been taken out. **The restriction to mandatory changes is crucial** in order to avoid overlaps with voluntary agri-environmental-climate payment and to make sure that priority is given to voluntary commitments where the resulting costs or income forgone of changes in the farming practises are compensated.

## **Article 33: Designation of areas facing natural and other specific constraints**

Copa-Cogeca is extremely concerned by the new delimitation of less favoured areas based on 8 biophysical criteria because certain areas will no longer receive support and the objective of Article 33 will therefore not be achieved. **There must therefore be more flexibility in the criteria used.**

In addition there should be **subsidiarity** in the Member States to define the areas facing natural and other specific constraints other than those referred to in paragraphs 2 and 3. As those can vary the **percentage should be higher than 10%.**



3. In order to be eligible for payments under Article 32, areas, other than mountain areas, shall be considered as facing significant natural constraints if at least ~~66%~~ of the UAA meets at least one of the criteria listed in Annex II at the threshold value indicated. Respect of this condition shall be ensured ~~at the appropriate level of local administrative units ("LAU 2" level).~~

~~When delimiting the areas concerned by this paragraph, Member States shall undertake a fine-tuning exercise, based on objective criteria, with the purpose of excluding areas in which significant natural constraints in accordance with the first subparagraph have been documented but have been overcome by investments or by economic activity.~~

4. Areas other than those referred to in paragraphs 2 and 3 shall be eligible for payments under Article 32 if they are affected by specific constraints and where land management should be continued in order to conserve or improve the environment, maintain the countryside and preserve the tourist potential of the area or in order to protect the coastline.

Areas affected by specific constraints shall comprise farming areas which are

homogeneous from the point of view of natural protection conditions and their total extent shall not exceed ~~10%~~ of the area of the Member State concerned.

3. In order to be eligible for payments under Article 32, areas, other than mountain areas, shall be considered as facing significant natural constraints if at least **50%** of the UAA meets **either** at least one of the criteria listed in Annex II at the threshold value indicated **or the criteria of the index system currently in place at Member State level**. Respect of this condition shall be ensured at the **LAU2 level or at the level of a clearly delineated local unit which covers a single clear contiguous geographical area with a definable economic and administrative identity**

4. Areas other than those referred to in paragraphs 2 and 3 shall be eligible for payments under Article 32 if they are affected by specific constraints and where land management should be continued in order to conserve or improve the environment, maintain the countryside and preserve the tourist potential of the area or in order to protect the coastline.

Areas affected by specific constraints shall comprise farming areas which are homogeneous from the point of view of natural protection conditions and their total extent shall not exceed **15%** of the area of the Member State concerned.

## **Annex II: Biophysical criteria for the definition of areas facing natural constraints**

The threshold for steep slopes should be decreased from 15% to 9%.

<b>CRITERION</b>	<b>DEFINITION</b>	<b>THRESHOLD</b>	<b>THRESHOLD</b>
<b>Steep Slope</b>	Change of elevation with respect to planimetric distance (%).	$\geq 15\%$	<b>9%</b>

# Cooperation

## **Article 36: Cooperation**

It should be required that primary producers are involved in the forms of cooperation which are supported in line with current legislation (Art. 29.1).

Priority should be given to POs, APOs and interbranch organisations.

Individual farmers and producer groups/producer organisations play a major role in the development of short supply chains and local markets and should be specifically mentioned under 2d).

# Risk management

## **Article 37: Risk management**

Agri-cooperatives and other types of producer organisation, as well as farmers organisations and interbranch organisations, should play a stronger role in taking out insurance contracts and setting up mutual funds

Given the increased risk of climate extremes as a result of climate change, losses incurred should also be eligible for support (e.g. droughts, floods, excessive rainfall, hail, heat waves, storms).

More effective farm risk management can be achieved in certain cases, especially reinsurance, by complementing mutual funds by insurance systems and this should be permitted.

Mutual funds should be permitted to carry over unspent funds from one year to another.

Given that risk management is a relatively new tool at EU level, Commission should be requested to carry out a mid-term review of the implementation of risk management under this Regulation. This would provide practical information to Member States not yet implementing such schemes and would provide a basis for improvements and updating (e.g. whether the 30% threshold constitutes an adequate incentive for farmers to eradicate or contain a plant disease or pest, and thereby prevent further spread of the disease; whether cover should be extended to new diseases).

# Crop, animal and plant insurance

## **Article 38: Crop, animal, and plant insurance**

Lack of data on average production for valid reasons (e.g. not having produced the crop in previous years) should not prevent farmers from being eligible for compensation.

Production loss is sometimes difficult to assess (e.g. permanent pasture) and the use of indexes may be a helpful alternative.

# Mutual funds for animal and plant diseases and environmental incidents

## **Article 39: Mutual funds for animal and plant diseases and environmental incidents**

More effective farm risk management can be achieved in certain cases by complementing mutual funds by insurance systems and this should be permitted.

In art.71 of Reg.73/2009 financial contributions may relate to capital and it is unclear why the European Commission is proposing to change this.

Broadening the list of animal diseases would take more account of the different conditions in Member states.

# Income stabilisation tool

## **Article 40: Income stabilisation tool**

It should be also possible to use insurance to cover economic risks. This would enable Member States to decide which tool was most appropriate given the local circumstances.

# Common provisions for several measures: Investments

## **Article 46: Investments**

Second-hand machinery should be eligible for support as it may be a more cost-effective way of improving competitiveness of the farm and it is provided for under paragraph 6.

The limitation of support to investments in irrigation that lead to a reduction of at least 25% of previous water use, as well as accepting new irrigation installations only in the Member States that adhered to the union from 2004, can have negative impact to the competitiveness of agriculture in countries where the use of water is a key factor and should be deleted.

The use of more efficient irrigation systems that allow better management of water resources should be encouraged, but the margin of saving water strongly depends on the starting point (among others the current inefficiency, use of old technical). Savings in water generally involves a financial economy. For this reason there should not be any additional conditions relating to the percentage of reduction of water consumption. Furthermore, more efficient management of water also results in the reuse of water, which does not necessarily mean a reduction in water consumption per se (but of course of the qualitative side).



# EIP for agricultural productivity and sustainability

## **Article 61: Aims**

The forestry sector should not be excluded from EIPs. Improving cooperation (Art 36) within the forestry sector as well as with the wood processing industry and developing partnerships with the scientific field towards research and development can help make further progress in developing the sector.

## **Article 62: Operational groups**

Developing partnerships with the scientific field towards research and development is also important for forestry.

# Fund contribution

## **Article 65: Fund Contribution**

Copa-Cogeca believes that achieving green growth, namely achieving the integration of environmental protection in the production process in a way which maintains production capacity and contributes to efficiency and productivity, will be the major global challenge of the future if we are to meet world food demand and cope with climate change in a sustainable way. Therefore Member States should be required to ring-fence a proportion of the total EAFRD contribution to rural development programmes for Green Growth measures under article 18bis, proposed above.

## Fund contribution

Copa-Cogeca is concerned with the proposal to ring fence at least 5% of the funding for Leader. Leader should be seen as a tool to achieve objectives rather than an end in itself. For certain projects Leader is not the appropriate tool as shown by the costly nature of current implementation and disparate performance of Leader when implemented by Local Action groups resource.

Any monies that are transferred from Pillar 1 to Pillar 2 under Article 14 of proposed Regulation (EU) No DP/2012 (Flexibility) should have co-financing requirements attached in line with core EAFRD monies.

5. ~~At least 5% of the total EAFRD contribution to the rural development programme shall be reserved for Leader.~~

5. All expenditure co-financed by the EAFRD shall not be co-financed by way of a contribution from the Structural Funds, the Cohesion Fund or any other Union financial instrument.
6. Public expenditure on aid to enterprises shall comply with the aid limits laid down in respect of State aid, unless this Regulation provides otherwise.

**5. At least 10% of the total EAFRD contribution to the rural development programme shall be reserved for measures to promote Green Growth under Article 18bis. A maximum of 5% of the total EAFRD contribution to the rural development programme shall be reserved for Leader.**

6. All expenditure co-financed by the EAFRD shall not be co-financed by way of a contribution from the Structural Funds, the Cohesion Fund or any other Union financial instrument.
7. Public expenditure on aid to enterprises shall comply with the aid limits laid down in respect of State aid, unless this Regulation provides otherwise.
8. **(New.) The funds transferred to the EAFRD in application of Article 14 of Regulation (EU) No DP/2012 shall have a maximum contribution rate of 50%.**

## **Annex I: Amounts and support rates**

Copa-Cogeca's proposal to introduce a new measure 'promoting green growth on farms' requires an amendment to Annex I. The possibility to introduce thematic sub-programmes for women farmers with higher maximum rates should also cover Farm Business development under Article 20. Maxima for areas with natural constraints should be deleted

Article	Subject	Maximum amount in EUR or rate	
<b>New 18bis(3)</b>	<b>Promotion of Green Growth on farms</b>	<b>50%</b>  <b>450</b>  <b>200</b>	<b>of the amount of eligible investment</b>  <b>per ha per year</b>  <b>per Livestock Unit per year</b>
20(6)	Farm and business development	70.000 70.000 15.000 <b>70.000</b>	Per young farmer under 33(1)(a)(i) Per enterprise under 33(1)(a)(ii) Per small farm under 33(1)(a)(iii) <b>Per women farmer</b>
32(3)	Payments to areas facing natural or other specific constraints	25 250 300	Minimum per ha per year Maximum per ha per year <del>Maximum per ha per year in mountain areas as defined in Article 46(2)</del>

# Conclusion

## **Copa-Cogeca calls for:**

- **a strong CAP**
- **a strong Single Market**
- **backed by a strong budget**



**Thank you**  
**[www.copa-cogeca.eu](http://www.copa-cogeca.eu)**