Mr Dacian Cioloş  
European Commissioner for Agriculture and Rural Development  
Member of the European Commission  
B-1049 Brussels

Brussels, 16 February 2012

APRODEV Comments on the Zero Draft, “The future we want” (10 January 2012) with regards to its implications for agriculture and the EU’s CAP reform process

Dear Commissioner Cioloş,

APRODEV is writing to you with the request to ensure strong and clear commitments to global food security and sustainable agriculture in the Zero Draft document for Rio+20, which we feel is urgently needed to overcome the multiple global crises and obtain “The future we want”.

Agriculture and the global food system are presently causing dramatic environmental problems while failing to feed almost one seventh of humankind. We now have an important opportunity to ensure agricultural policies become less a part of the problem and become more a part of the solution to contribute to long-term sustainable development. For this reason, APRODEV feels the need to comment on the Zero Draft and CAP which has implications for agriculture and on how it relates to the CAP reform process.

Concerning agriculture, the Zero Draft document for Rio+20 should include commitments to make a transition towards sustainable and agro-ecological food systems that protect and promote the renewal of ecosystems, increase support to smallholders, are controlled by local producers and consumers, and that promote local food economies, food security, resilience, and biodiversity.

At the UNCED meeting in 1992 in Rio de Janeiro, governments already underlined the need for policy frameworks on sustainable agriculture and rural development (UNCED, Agenda 21, Chapter 14.6). In 1992, UNCED adopted the Convention on Biological Diversity (CBD) and the UN Framework Convention on Climate Change (UNFCCC), which are both relevant to European agriculture. Today there is an urgent need to act in this regard.
The greening measures in the CAP reform proposals are a first step and seem to be a composition of different isolated measures across pillar I and II. The concept of greening in the CAP can neither be considered a comprehensive policy framework on sustainable agriculture and rural development nor are the greening measures consistently applied throughout the proposals. Further, the CAP 2013 proposals prioritise international competitiveness over socio-economic and environmental sustainability. This approach is also reflected in the Zero Draft. The current system of export orientation and GNP growth measured in purely financial terms is not called into question. Here we see one of the main shortcomings of the Zero Draft.

The EU CAP reform is first and foremost concerned with securing European food security. It argues that European production needs to increase to secure global food supplies and does not address its international responsibility in a serious way. However, the UNCED Agenda 21 commits countries to assess their agricultural strategies against their external impact to identify potential losers and necessary reviews of trade rules; this includes import and export flows and their impact on marginalised people. Agenda 21 (Chapter 14.25) further emphasises the importance of culturally and locally suited food supply and consumption patterns and calls on countries to prevent the substitution of local food by imports. However, the CAP reform proposal does not promote the diversification of agricultural production systems and the efficient use of domestic resources; and CAP proposals on crop rotation and incentives for legumes are too weak to be considered a convincing response to Agenda 21.

Agenda 21 calls for shared global responsibility to limit the negative effects of global productivity increases, to prevent soil degradation and accept ecological limits. It also appeals to countries to come up with (Chapter 14.6 and 14.44) joint solutions for a common sustainable future. Implicitly, this means that efficiency gains for sustainable productivity increases are best made in the South and that the EU should focus on reducing waste rather than on increasing production.

In response to its Agenda 21 commitments and to the new dimensions of resource-scarcity the EU should make bold commitments in the Rio+20 document that show clearly how Europe will implement the transition towards a biodiverse, sustainable and resilient food system that addresses the needs of the poor. Concerning agriculture, APRODEV recommends the following amendments to the current Draft Zero text:

**[Green economy]**

We recommend amending:

31. We note that the transformation to a green economy should be an opportunity to all countries and a threat to none. We therefore resolve that international efforts to help countries build a green economy in the context of sustainable development and poverty eradication must not:

   a) create new trade barriers;

   b) impose new conditionalities on aid and finance;

   c) widen technology gaps or exacerbate technological dependence of developing countries on developed countries; the dependence created by GMO seeds is a case in point.
d) restrict the policy space for countries to protect their economy against unfair competition, especially concerning agriculture and to pursue their own paths to sustainable development.

[Toolkits and experience sharing:]

We recommend amending:

33. We support the creation of an international knowledge-sharing platform to facilitate countries’ green economy policy design and implementation, including: a menu of policy options; a toolbox of good practices in applying green economy policies at regional, national and local levels; a set of indicators to measure progress; a grievance mechanism for farmer organizations to file complaints regarding the effects of import surges and import substitution on their markets; an enforcement mechanism to prevent abuse of power and anti-competitive practices in the food and input markets; a directory of technical services, technology and financing that could assist developing countries; a mandate to the UN Committee on World Food Security (CFS) to develop a work plan specifying indicators for progress towards the implementation of the IAASTD findings with adequate follow up mechanisms at national level.

[Food Security]

We recommend to delete and to replace:

64. We reaffirm the right to food and call upon all States to prioritize sustainable intensification of food production through increased investment in local food production, improved access to local and global agri-food markets, and reduced waste throughout the supply chain, with special attention to women, smallholders, youth, and indigenous farmers. We are committed to ensuring proper nutrition for our people.

64: We welcome the findings of International Assessment of Agricultural Science and Technology for Development (IAASTD) which highlights the unsustainable nature of the current food system, which is failing both to ensure the right to food and to preserve the ecosystems on which future food production depends. This situation is exacerbated by climate change and other forms of environmental degradation. We reaffirm the right to food and call for a transition to sustainable agriculture and food systems based on enhanced support to small scale farmers, and agro-ecological farming methods and other sustainable and resilient forms of food production that contribute to poverty reduction, gender justice and climate change adaptation while preserving ecosystem services for future generations.
We recommend amending:

65. We call for more transparent, and open- and fair trading systems, and, where appropriate, practices that contribute to the stability of food prices and domestic markets as well as allowing better market access for smallholders; ensure equitable access to land, water and other resources; support the self-organisation of small scale food producers; address the externalities of agriculture and implement the polluter pays principle; and support social protection programmes.

66. We further support initiatives at all levels that improve access to information, enhance interactions among and between farmers and the scientific community through education and extension services, promote farmer-driven research and innovation, decrease waste and loss throughout the food system, focus on farmers working with sustainable practices on marginal land and increase the use of appropriate technologies, agro-ecological approaches and other appropriate technologies for sustainable agriculture.

We welcome this paragraph:

77. We stress the need to provide social protection to all members of society, including those who are not employed in the formal economy. In this regard, we strongly encourage national and local initiatives aimed at providing a social protection floor for all citizens.

We recommend amending:

92. We recognize the economic and social significance of equitable access to land, particularly its contribution to growth, food security, and poverty eradication and gender justice. We note that the intensity of desertification of most of Africa’s arable land is a serious challenge to sustainable development in the region. We call for enhanced support by the international community to the implementation of the United Nations Convention to Combat Desertification (UNCCD).

95. We call for strengthening the Strategic Approach to International Chemicals Management (SAICM), to step up efforts towards a more robust, coherent, effective and efficient international regime for chemicals throughout their lifecycle, taking account of their detrimental impacts on health and the environment, including the loss of biodiversity. Sustainable and adequate long-term funding will be important to assist developing countries with sound chemical and waste management through an integrated approach.

[Trade]

We recommend amending:

125. We reaffirm that there is an urgent need for the international economic and financial institutions to work together to ensure that developing countries, particularly the least developed countries, are able to participate effectively in making the rules of benefit from the advantages of
the multilateral trade system in order to benefit from and their participation integration in national, regional and to global markets.

126. We call support for the immediate eventual phasing out of market distorting and environmentally harmful subsidies that impede the transition to sustainable development, including those on fossil fuels, agriculture and fisheries, with safeguards to protect vulnerable groups.

In APRODEV’s view, this would mean that the EU should immediately end all its export subsidies, carry out a comprehensive impact assessment of its direct payment schemes and critically analyse the extent to which EU exports benefit from its import regime.

127. We support the trade capacity building and facilitation activities of international and regional organizations which would assist developing countries, particularly the least developed countries, in building supply side capacity and in ensuring that small businesses benefit from identifying and seizing new export opportunities, including those created by the transition towards a fair and just green economy.

We urge the EU to support actionable commitments in the Zero Draft to allow the urgent transition to sustainable agriculture worldwide.

A commitment to the transition towards sustainable agriculture is of crucial importance for the Rio+20 process as well as for the CAP reform. We call on the Commission to steps up its efforts to ensure the CAP reform makes a transition to sustainable agriculture.

We hope that you will seriously consider these points as the European Commission prepares for and gives its views to the zero draft text of the Rio+20 conference.

Yours sincerely,

[Signature]

Robert W.F. van Drimmelen
General Secretary of APRODEV

Cc: Commissioner Piebalgs, Commissioner Potočnik and Commissioner de Gucht,