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## **FINAL MINUTES**

*Meeting of the Civil Dialogue Group Direct Payments and Greening*

*Date: 05/10/2018*

Chair: **Mr Pierre-Olivier DREGE**

Organisations present: **All Organisations were present, except European Crop Protection Association (ECPA) and European Milk Board (EMB).**

### **1. Approval of the agenda (and of the minutes of previous meeting<sup>1</sup>)**

The agenda was agreed after the inclusion of the suggestion by COPA, to discuss the derogations due to the summer drought in the AOB point. The minutes of the last meeting were approved.

### **2. Nature of the meeting**

The meeting was non-public.

### **3. List of points discussed**

#### Overview of the CAP Strategic Plan (agenda point 3)

Gaelle MARION from DG AGRI presented the preliminary ideas for the template for the CAP Strategic Plans, with the caveat that what was presented had, at the time, no interpretative value. The presentation was made available by the commission services.

COPA asked if there would be a special provision to deal with federal countries, like Germany and if the rural development aspect could be dealt with at regional level, due to the importance to adapt measures to the regional context.

BIRDLIFE had several questions on the content of the strategic plans, namely the detail required when justifying the flexibility between pillars, of the eco-schemes, and of the relevant state aid in the annexes. Birdlife also asked if the plans could be accessed by the public and what was to be the level of involvement to be granted to NGOs.

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<sup>1</sup> If not adopted by written procedure (CIRCABC)

EFNCP asked if there would be another mechanism for controls and penalties.

EEB asked about the possibility to have a common methodology to approve the Strategic Plans to avoid the weakening of the environmental aspects.

COPA welcomed the proposed section on simplification but was afraid that Member States would not take it as a priority and asked how the commission would guarantee simplification for farmers. Copa also commented on the need for the Strategic Plans to be made available to the public.

IFOAM has a question on the level of details required for each intervention, particularly on the different agricultural practices.

GREENPEACE asked how strict the Commission would be when approving the different national plans and what methods would be used to evaluate them. GREENPEACE was of the opinion discussions over result indicators would be good for training, but it would be controls and penalties that would avoid a race to the bottom.

CELCAA was worried about the commonality of the policy and asked if simplification could be an indicator.

WWF asked how the Commission would measure environmental ambition and if it was solely linked with impacts indicators.

FOOD DRINK EUROPE, represented by Starch Europe, expressed concern over the continuation of coupled income support to starch potatoes and asked how the Commission would guarantee, in their approval process of the concerned national strategic plans, fair competition across the Member States, between the farmers and the factories they provide their agricultural raw materials to.

BEELIFE was of the opinion that the indicators resemble an administrative tool, rather than a performance tool, particularly on the environmental aspects. BEELIFE highlighted the need to guarantee coherence with existing environmental law, namely the Sustainable Use directive.

After directing, the questions related to the indicators and the increase environmental ambition to the following presenter, Gaelle MARION replied that having regional elements was possible but not mandatory, as long as these would be clear and allow to have a coherent national strategic plan. Outputs will be at the level of interventions (and also with regional interventions), but with aggregated results at CAP Plan level.

The flexibility between pillars will be part of the financial plan, if the Member States decide to make that choice.

Member States should also be specific when describing their interventions and related financial allocations. They should indicate what is addressed under state aid. But descriptions don't need to be long.

Eco-schemes can be designed either as a compensation for cost incurred and income forgone or as a top-up to the basic income support. Their unit amount needs to be justified, notably for WTO compliance.

The Strategic Plans will be public and will allow for the involvement of stakeholders, as described in article 94. The involvement is expected on the designing of the plan and for the monitoring.

For the system of controls and penalties, no new system or separate information are envisaged.

The use of common context indicators is expected for the swot analysis and a common methodology (or common principles) for the calculation of the values of targets. The methodology related to the result indicators would come later.

Simplification for the final beneficiary will be difficult to analyse on paper but the increased level of subsidiarity should help MS design efficient delivery mechanisms. The proposal has a strong potential to simplify since MS can adapt their systems to their particular context. Besides, the new system of monitoring using new technologies should really help simplify administrative controls.

The Plans should describe the practices but in a concise way, as it should not be too long.

Member States are required to justify the reason for coupled payments interventions, namely the difficulties of the sector, and the unit amount. This targeting of coupled income support should avoid distortion of competition.

Pierre BASCOU emphasised the change of logic with this proposal, as Member States will be asked to allocate their budget to address the needs and weaknesses identified, justifying their plans accordingly. At the moment, Member State are only required to be compliant, independently of the needs of the country.

#### Objectives and Indicators (agenda point 4)

Mike MACKENZIE from DG AGRI gave a presentation on this point, which was made available by the Commission services.

EBB asked about the method calculation for the performance bonus and asked which result indicators would be taken into account when accounting for the annual performance at MS level.

COGECA asked about the procedure on how to link the biodiversity indicators I.18 and I.19 to the performance oriented approach. COGECA was worried of the potential impact on famers for the measures designed by the Member States and if the commission would consider a sharing of responsibility if the targets were not reached.

COGECA was of the opinion that indicators should not be considered in isolation from outside effects. Also, it was considered important to allow member states enough time to adapt to design the strategic plans, by means of a transitional period.

EFNCP asked how this would be dealt with at a regional level.

BEELIFE asked for clarity on how controls and sanctions would apply to famers in regard to the environmental objectives and asked if the Commission was considering a “pollinator indicator”.

BIRDLIFE commented on the example given in the presentation, in relation to water, believing it to be too vague and asked if future examples given could be more complete.

CELCAA asked about the possibility of integrating existing environmental practices originated in projects, such as LIFE projects, in the Strategic Plans, particularly in eco-schemes.

Taking the example of percentage of groundwater stations with N concentration of 50mg/l, COGECA asked if the commission would use the same methodology and if such methodology would be part of the discussions when designing the strategic plans.

COPA reflected on the importance of having clear indicators that reflected the practices on farms.

EURAF commented on the lack of ambition with the use of new technology. Indicators based on LPIS and new technologies would allow moving away from indicators solely linked with the allocation of areas and funds and, instead, allow observing the effects of specific measures on different farm practices.

Mike MACKENZIE replied that, at the time, he could not give a fully precise answer about the calculation methods for the performance bonus.

The example provided, on water, did not provide a full breakdown of the information that would have to be provided under the output indicators shown in the presentation. However, more detailed examples could be provided in the future.

I.18 and I.19 (farmland birds' index and status of habitats) refer to impact indicators, but the targets were set at the level not of impact but of result indicators. The failure of a given CAP strategic plan to meet biodiversity-related targets in a given year would not in itself lead to sanctions for farmers.

Biodiversity was a theme for which the currently available context/impact indicators left something to be desired and work on this issue would continue in future.

The question on the possibility of a "transitional period" – during which MS might not have to fully apply the results-based system proposed for the CAP - was referred to another colleague.

In Member States with a federal structure, there might be pressure to have a higher number of interventions as a result of desired regional variation. This would have to be addressed carefully.

In work streams not limited to the CAP, the Commission was looking into other possible biodiversity-related impact indicators, such as a "pollinator indicator". However, the Commission's proposal for the future CAP was based on indicators which were already functional (though imperfect).

Most proposed impact indicators were also being used as impact and context indicators in the current programming period, thus their development for the coming period would not start from scratch. No huge disparities were to be expected among methodologies from the current period to the future.

Over time, the Commission's general ambition was to move further on indicators and use the potential of new technology in this respect. However, the Commission's proposal was

based on indicators which were currently operational. Furthermore, it was important to set targets at the level of indicators whose values would be directly influenced by the CAP, within the relevant timeframe, without strong influence from external factors.

Gaelle MARION added that additional details on indicators were foreseen as an implementing act.

#### Types of DP interventions and the future green architecture (agenda point 5)

Aymeric BERLING from DG AGRI gave a presentation on this point, which was made available by the Commission services.

It was followed by presentations by Jabier Ruiz from WWF, Gerry Lawson from EURAF and Udo Hemmerling from COPA, which PowerPoint presentations were made available by the Commission services. Trees Robijns from BIRDLIFE spoke on this point (without a PowerPoint), welcoming the proposal on eco-schemes that were a chance to divert money to more targeted schemes with a different cost structure. Eco-schemes should come with minimum quantitative elements set at EU level to avoid a race to the bottom, and 50% of the first pillar should be dedicated to them. As an example of an eco-scheme, BIRDLIFE suggested allowing for “space for nature” as a simple, basic element to solve biodiversity problems. Such eco-scheme could be possible in all types of land coverage, must not allow the use of chemical inputs and must restrict tillage. It would build up on conditionality.

COPA pointed out that no one was against environmental friendly agriculture when it was viable and feasible for farmers.

COGECA stressed the importance that the eco-schemes would, at least, cover costs of changing practices, giving the example of buckwheat in Lithuania, where the price halved.

COPA asked if farmers could be collectively involved in eco-schemes and asked if eco-schemes would be monitored annually or multi-annually, due to the time needed to see results.

BIRDLIFE asked how the Commission would calculate the top-up, how smart farming would be designed into an eco-scheme, and in which conditions would certified farmers were to be considered as “complying by definition”.

GREENPEACE wondered if the “no backsliding” could be guaranteed by analysing spending instead of relying on wording alone. Secondly, as the precision of objectives would be more important in the new CAP, GREENPEACE wondered if having an “efficient management of natural resources” was the right wording, as it did not necessarily translate into sustainable practices. Lastly it was asked if regional problems would be diluted by national averages, for instance, if it would be possible for France to ignore the nitrogen problem in Britany when designing their strategic plan.

COPA was worried about the proposal to ring-fence direct payments for eco-schemes and pointed out that direct payments had already an environmental aspect that should be recognised, namely due to conditionality.

EFNCP asked if extensive grazing in permanent grassland with a maximum stock density could be considered as an eco-scheme.

IFOAM asked for clarification on double funding, pointing out that it should not stop the possibility of implementing the policy in a more flexible way, and asked if the commission would consider a list of practices for a “negative list”.

CEJA was worried of the impacts on farmer’s income if 50% of the first pillar would go to eco-schemes, as suggested by BIRDLIFE. The idea of a simple eco-scheme was welcomed. Finally, CEJA would like to see the same definition of young farmers and active farmers throughout all Member States.

EEB asked for clarity on the connection of eco-schemes with pillar two measures and on the ring-fencing for ANCs.

CELCAA asked if it would be possible to design an eco-scheme for improve livestock farms, namely to limit GHG emissions.

Trees Robijns from BIRDLIFE clarified that it was not their suggestion that all CAP money was to be dedicated to biodiversity. Eco-schemes could provide an extra income. Currently, direct payments were creating obstacles for farm takeover and leading to higher rents.

Udo Hemmerling from COPA pointed out that, primarily, farmers operated in open markets and lived from producing food and were suffering pressures from the food chain on certification schemes. Nonetheless, where farmers could find benefits in eco-schemes was a welcomed development. He considered ANCs to be a helpful tool that allowed for a long-term perspective and stability.

Jabier Ruiz from WWF reiterated that the point of eco-schemes was to improve existing practices or reward those farmers who were already doing a good job. This tool should not be capped but needed to go beyond the standard practices.

Emmanuel PETEL from DG AGRI confirmed that eco-schemes could be either annual or multiannual, as long as they were paid annually, thus each year renewing commitments that could continue over time. Member States should ensure coherence between the eco-schemes and AECM. Also, member states would have the possibility to design the support for eco-schemes in different ways, namely as a top up or as income forgone, as long as it is compatible with the WTO green box. This would be taken into account by the commission when approving the strategic plans. Also, the “no backsliding” is a global analysis done by the Commission.

Pierre BASCOU concluded the discussions of the morning session by urging the stakeholders to communicate on the points discussed with the different national authorities.

On the budget, Pierre Bascou pointed out that the focus should not be on the cut of 5% but instead on the need to be more efficient when managing the budget, addressing the real needs of the farming community. In terms of efficiency, the economic position and the environmental aspects should not be put against each other, but seen together. He also

referred to other ways of supporting the sector, namely the recent approved legislation on UTPs and the important increase of the research budget.

This reform focuses on performance and long-term strategy of the CAP, and it is important to move away from the old logic of measures and the money allocated for those measures. It is important to learn from the errors of the past. Thus, in the strategic plans, member states will need to base decisions on good assessments and against those, decide what to achieve before designing how to achieve it, being it eco-scheme or AECM, for example. The budgetary issue comes at a later stage, thus asking for ring-fencing for eco-schemes seems to be premature.

#### The Farm Sustainability Tool for Nutrients (agenda point 6)

Valentin OPFERMANN from DG AGRI gave a presentation on this point, which was made available by the Commission services. The link to the FAST tool was also provided.

COGECA missed soil data on the tool presented.

EURAF welcomed the tool but considered it not to be the only approach. Other, more ambitious tools could be used and should be incentivised, thus allowing for more competition. With that in mind, it was asked if LPIS geospatial information would be made more accessible.

COGECA asked if the use of this tool was compulsory and what was the risk of it being used by the administrations to increase control over the farmer.

FERTILIZERS EUROPE considered this tool as a positive step towards better nutrient management, with multi purposes. It was also welcomed that existing soil analysis could be used and asked the commission to also look into existing tools that consider the needs of the plants, for example the tools developed by the industry, as long as they are not overcomplicated. Would the commission consider developing similar tools to other environmental aspects, namely GHGs emission and soil carbon?

COGECA asked about the technical aspects of the tool, namely if it centralises other data, like IACS. It was also asked if this tool would be customised to the member states.

COPA pointed out that not all farms would be comfortable using such tools and asked if the commission was considering easing its use by having a try-out phase without penalties, and by having technical support available.

COPA asked if it would be mandatory to all farmers, even those that only have extensive grassland and if a farmer would be forced to use this tool if he was using another tool commonly used in their country.

COPA confirmed the existence of similar tools and asked if it would be possible for existing tools to be plugged in. Also, while most farmers would be comfortable with the technology, age and broadband access were considered important limitations and asked what plans the commission was devising, particularly on advice, to make this workable.

Valentin OPFERMANN replied that soil analysis were considered the basis for proper nutrient management but the requirement of soil testing would not go beyond existing

requirements, like the ones under nitrates directive. Most information would come from soil maps and existing databases but a farmer could add additional information. Member states can support farmers to undertake soil tests.

Existing tools served as an inspiration and could still be used as long as they include the basic requirements (annex three).

The tool would be based on incentives rather than obligations and controls, as no follow up on the implementation of the tool is envisaged. Therefore, the farmer should be easily convinced of the added value of this tool.

The focus of this tool was on water quality but GHG emissions could be pursued and integrated, due to its module approach. This structure, allows member states to customise it according to their needs, with the commission proposing the basic framework.

Advisory services should be designed and instructed to boost the uptake and help the farmer using it.

Broadband could be a limiting factor but it can be use the tool offline.

The farmer can exclude certain parcels, for instance extensive grasslands, if no fertilisers are applied.

Piotr WOJDA from DG AGRI clarified the point on sharing spatial data from the Integrated Administration and Control System (IACS). In this context spatial data refers to non-personal, environmental and climatological related data on agricultural land-use and land cover which is stored in IACS databases, and which fall under the scope of the INSPIRE Directive. He confirmed that DG AGRI is working with DG ENV, DG CLIMA, Eurostat and with MS authorities towards an INSPIRE Directive compliant solution to share such data. DG AGRI is also working with DG JRC on technical solutions to help MS implement their obligations.

COPA commented that it would appear more reasonable to have it as a pilot tool for a certain period before making it compulsory or, otherwise, making it voluntary.

Both COPA and COGECA asked who owned the data.

COPA wondered if the use of this tool would be a simplification for extensive livestock farmers and what would be the advantage for them. It was also asked if the tool would differentiate organic approved fertilisers.

COGECA asked if extra support for additional advisory services was being considered.

EFNCP welcomed the tool but was the percentage of farmers not be comfortable using it would be high, and if it could be a repetition of the electronic tags problem. Field tests should be considered to avoid implementation problems.

COPA asked what would happen if the data would not reach Brussels.

COPA pointed out that in Denmark, due to the fact that the country was a NVZ in its entirety, farmers were using private tools and asked if the tools could be linked.

Valentin OPFERMANN said that Commissioner Hogan proposed the use of this tool due to the experience in Ireland and considered the Irish example as a pilot.



Farms should be incentivised to use it for efficiency purposes but also because agriculture remains an important cause of water pollution and farmers are asked to reply to this problem. This problem requires a critical mass and actions only from those in NVZ would not be enough. Also, by being a GAEC, member states will have to put resources into it, which will benefit the farmer.

The tool does not differentiate between fertilizers nor does it oblige to do soil analysis.

The farm owns the data, which would be stored in the cloud that the farmer has access to. Data is to be shared with entities to which powers were delegated by the farmer and data privacy and anonymity would have to be respected.

The farmer has to download the tool and input data and by doing so he is considered compliant. He can use it further without it being checked.

Also, the toll can integrate information that is not in an “app”.

Valentin OPFERMANN presentation was then followed by two stakeholder presentations, the first made by Jabier Ruiz from WWF on AQUAS, and the second made by Catherine Lascurettes from COPA on FAS in Ireland. Both presentations were made available by the commission services.

COPA commented on the importance of the tool presented on water management, particular when farmer are forced to changes practices due to lack of water. A pressure that is not felt in the majority of other countries in Europe, where it should centre on increase efficiency and crop changes are not needed.

Jabier Ruiz from WWF confirmed that this type of tool was particular relevant for water stressed countries.

#### Update on using ICT, satellite technology and remote sensing for a simpler and smarter regulation and controls (agenda point 7)

Jerome WALSH from DG AGRI gave a presentation on this point, which was made available by the Commission services.

EURAF started by questioning if the commission was considering improving the mapping of trees on farms, which would be particularly useful for LULUCF reporting. EURAF also what would happen with the “hundred trees” rule in future calculations of direct payment eligibility.

COPA wondered if it would not be better for the monitoring requirement in the horizontal regulation to be voluntary for member states until is fully functioning.

COPA commented on the importance of having legal certainty and that the advantages for farmers are clear, namely the simplification. Non-compliance often has to do with really small areas, small corrections and not requiring so much detail could indeed lead to simplification. At the moment, farmers are afraid that in the beginning of the monitoring process farmers will have more data requests.

BIRDLIFE congratulated the Commission on this work and the advances in the use of these tools. The point on the common database and the recording of landscape features

was repeated and finally, asked which countries were already considering implementing it.

Jerome WALSH replied that the Commission was expecting to receive official notifications from member states by the first of December, in accordance with the legal provisions. Checks by monitoring for control purposes is a voluntary option for MS in the current period, and it is proposed that it would remain as a voluntary option in the reform proposals. Post-2020, it is also proposed that MS must set up a “higher-level” area monitoring system for environmental, climate and policy monitoring purposes, in order to estimate the impact of interventions at regional/national levels and to have data which can be comparable at EU level.

The Commission’s main aim is to offer a tool to help minimise the cost of controls and reduce the time and stress associated with field visits. The requirement for authorities to set-up a warning system will also help reduce the number of penalties on farmers under this new approach. A tolerance system is included in the provisions (dependent on the level of payments involved), which helps limit the resources required for follow-up activity.

Post-2020 MS will have subsidiarity to design their own environmental interventions such as the “hundred tree rule” and forestry, thus measurement and tracking of such features will depend on MS choices. It is foreseen, that the Land Parcel Identification System will continue to play a key role with regard to measurement of such features.

One key advantage of Sentinel satellite data is the ability to monitor compliance over a time series. For example, it can be used in catch crop controls by checking if the required crops are kept in place for all of the required period.

Member States are allowed to phase-in checks by monitoring on the basis of non-discriminatory objective criteria, as long as full coverage of the scheme/measure or type of operation was achieved by year 3.

The introduction of checks by monitoring was still at the early stages but Member States were making tremendous progress, with data and experiences building-up through numerous pilots projects over recent years. A number of challenges have also been identified along the way, and the Commission’s services are working with MS to resolve any issues as they arise.

### AOB

COPA appreciated the exception on greening due to the extreme circumstances suffered, but regretted that some of those decisions were taken too late. It was considered extremely important that extreme climate conditions were followed closely and the ways of managing these exceptional circumstances could be streamlined in the future. This would help avoiding the problems that payment authorities had, particularly with timings. Finally, COPA asked what actions the commission was considering to minimize the feed problems.

Emmanuel PETEL said that the Commission understood the difficulties caused by this situation and Member States will have more discretion in the future to deal with this.

Several Member states had limited capacity to react and react quickly and it may be necessary to adapt the administrative structures to deal with such conditions.

Ms LADISLAV added that any derogation was bound by existing legislation. Thus, the commission acted as fast as procedurally allowed. The Commission was now considering options to be faster, while in a structured way. For the future it will be under the new model and the issue will be considered under the new delivery model.

COPA commented that and often is more important to know when the payment would be mad rather than if is earlier or later, as it allow farmers to address their commitments.

END

#### **4. Conclusions/recommendations/opinions**

Read point 3.

#### **5. Next steps**

It was suggested to have a point on Animal welfare and how it could be addressed in the Strategic plans, as an agenda point for the next meeting.

#### **6. Next meeting**

Friday 29/03/2019 and Friday 11/10/2019.

#### **7. List of participants - Annex**

##### *Disclaimer*

*"The opinions expressed in this report represent the point of view of the meeting participants from agriculturally related NGOs at community level. These opinions cannot, under any circumstances, be attributed to the European Commission. Neither the European Commission nor any person acting on behalf of the Commission is responsible for the use which might be made of the here above information."*

List of participants– Minutes

**Civil Dialogue Group Direct Payments and Greening**

Date: 05/10/2018

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<i>FoodDrinkEurope (FoodDrinkEurope)</i>	<i>JACQUES</i>	<i>Juliette</i>
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<i>International Federation of Organic Agriculture Movements EU Regional Group (IFOAM EU Group)</i>	<i>Barbosa</i>	<i>Barbara</i>
<i>International Federation of Organic Agriculture Movements EU Regional Group (IFOAM EU Group)</i>	<i>de la Vega</i>	<i>Nicolas</i>
<i>International Federation of Organic Agriculture Movements EU Regional Group (IFOAM EU Group)</i>	<i>Sannen</i>	<i>Kurt</i>
<i>Pesticide Action Network Europe (PAN Europe)</i>	<i>SLABE</i>	<i>Anamarija</i>
<i>SACAR - Secrétariat des Associations du Commerce Agricole Réunies / Joint Secretariat of Agricultural Trade Associations</i>	<i>Redondo</i>	<i>Berta</i>
<i>Stichting BirdLife Europe (BirdLife Europe)</i>	<i>Robijns</i>	<i>Trees</i>
<i>WWF European Policy Programme (WWF EPO)</i>	<i>RUIZ</i>	<i>Jabier</i>
	<b>Total:</b>	<b>60</b>