

Modernising and Simplifying the Common Agricultural Policy (CAP) – comments from the European public water sector

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The nexus between water and food does not need an elaborate explanation. Water is essential for life and the basis of agricultural production.

Similarly, the water and agricultural sectors are intrinsically linked –agriculture is both one of the main water users as well as one of the major sources of anthropogenic pollutants in ground and surface water, however, it can also positively contribute to water quality by, for example, preventing erosion and retaining water. The Common Agricultural Policy (CAP) has recognized the importance of adopting a holistic vision that integrates the protection of environmental resources –including water– in its general objectives. However, while several reforms have aimed at making the policy more environmentally friendly by “greening” direct payments, the effectiveness of the CAP in providing for public goods still needs to be ascertained.

As the European association representing public water operators, we very much welcome this initiative aimed at analyzing whether the 2013 reform went far enough in meeting ongoing challenges. We consider it a promising sign the fact that some of the policy options outlined in the Inception Impact Assessment put a strong emphasis on fully integrating EU environmental targets in the future CAP. More generally, we greet the Commission’s ambition of further increasing the coherence between the CAP and other EU policies, but we believe that more can be done, as environmental and health concerns cannot be seen as objectives among others, and have to be put at the centre of all the policy options proposed.

First of all, we call for a more rigorous monitoring of the implementation of the “cross-compliance measures”, in line with the recent report by the European Court of Auditors (ECA Special Report 26/2016). European public water operators –members of APE– provide drinking water to more than 70 million citizens in Europe and are subject to EU environmental law, which sets clear targets for the quality of the drinking water provided to citizens. In most cases, the presence of pesticides and nitrates requires the treatment of water prior to its supply to households. The nature of the pollution that finds its origin in agriculture makes it currently impossible to exactly trace back each farmer’s responsibility. Thus, the treatment cost is born by the final consumer –and not the polluter. Better monitoring and implementation of cross-compliance could thus help limit water pollution and, consequently, ensure a better application of the polluter-pays principle.



At the same time, due to the difficulty in ensuring their implementation and the resulting complexity of control measures (as highlighted by the ECA Report), the cross-compliance measures cannot alone ensure the achievement of environmental targets. They need to be complemented by a greater resort to voluntary approaches. Therefore, we urge the Commission and Member States to promote the use of agri-environmental measures, through stronger incentives and a more flexible regulatory/governance framework.

European public water operators have since long promoted and implemented examples of voluntary approaches, by establishing effective and long-lasting partnerships with farmers operating on and around their catchment areas. These payment for ecosystem services (PES) schemes (some of which are described in the APE publication [Water and Climate](#)) are based on a close cooperation between the water operator and the farmer, who commits to specific results in exchange for a payment. Such approaches have thus allowed water operators make significant savings by avoiding the need to treat water –and thus reducing the final cost passed on to the consumer. More generally, by reducing pollution at source, these approaches are more economically efficient for society as a whole.

If the CAP really aims to place the provision of “public goods” and ecosystem services at its centre, the current approach –based on mere management requirements– needs to change. The experience of our members has shown that results-based payments are an effective tool to ensure compliance with environmental needs. Aiming at a “smarter” CAP, then, is not only a matter of a greater recourse to new technologies but, more fundamentally, it concerns the search for a more conducive governance framework which reconciles environmental, health and agriculture objectives through effective coordination between different stakeholders in different sectors. In this sense, we invite the Commission to use this opportunity to build a more smart, resilient agriculture that respects all EU environmental commitments by integrating PES-based schemes, based on results, in the CAP. This would ensure an effective application of environmental objectives and recognise the contribution of water operators as full actors of environmental policy governance.

About APE

Aqua Publica Europea (APE) is the European Association of Public Water Operators. It unites publicly owned water and sanitation services, and a wide range of stakeholders working to promote public water management at both European and international level. APE is an operator-led association that looks for efficient solutions that serve the public rather than corporate interests.