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# **SUSPENSION OF GREENING MEASURES OF THE CAP UNDER THE GUISE OF FOOD SECURITY**

**With Austria as a case study**

# “Food security is a very appealing argument that plays on our most fundamental fears.”<sup>1</sup>

## Abstract

45 million loaves of bread could be baked in Austria alone, as a "contribution to food security in Europe and the world" if land lying fallow and dedicated to biodiversity under the Common Agricultural Policy (CAP) was made available for food production. This was stated by Austrian MEP Simone Schmiedtbauer (EPP) against the background of rising grain prices after the start of the war in Ukraine. Numerous other (predominantly conservative) decision-makers from the European Parliament and the Member States came up with comparable arguments.

This raised criticism from the scientific community, warning of a negative long-term impact on Europe's agriculture, due to reduced biodiversity and impairment of ecosystem services. According to the scientists, it would make far more sense – and also be consistent with the Farm to Fork strategy – to use a bigger share of the existing farmland for the production of food while reducing subsidies for the production of livestock feed (which currently occupies more than 60 % of arable land).

Contrary to these recommendations, on 23 March 2022, the EU Commission took into account the demands of lobbyists and politicians and granted Member States a derogation to allow the use of fallow land for crop production without having to forgo the "greening payments" from the Common Agricultural Policy.

One year later, the EU Commission's figures show that 21 Member States had taken advantage of the suspension of greening requirements and converted an average of 40 % of their Ecological Focus Areas (EFA) into production and (with the exception of the Walloon part of Belgium) made the use of pesticides (plant protection products) possible.

But contrary to what lobbyists and politicians had claimed, these ecological focus areas were hardly used to grow wheat. The main crops instead were, according to the EU Commission, fodder such as maize and soya and the oilseed sunflower.

In Austria, where detailed data is available after a request by the environmental organisation GLOBAL 2000 – Friends of the Earth Austria, only 0.6 % (!) of the land under derogation was used for producing grain for food, despite the *"lack of grain for food aid worldwide"* that Austria's Minister of Agriculture had used as an argument to demand the greening derogations.

The loss of 56 % of ecological focus areas (about 12,000 hectares) compared to the previous year were the result. The largest declines were in catch crops (down 84 %), nitrogen-fixing crops (down 48 %) and areas for the protection of bees and other pollinating insects (also down 48 %). These serious losses are to the detriment of soil quality and biodiversity, and thus to the detriment of two essential pillars of agricultural productivity.

In short, with the argument of food security, the agricultural lobby and its political allies succeeded in undermining the sustainability measures of the CAP and the Green Deal. However, the suspension of the greening obligations of the CAP did nothing to alleviate real hunger in the Global South. It only served the short-term economic interests of a few and came at the expense of society and the environment.

The protection of biodiversity, along with the careful use of our resources, is crucial for future agricultural productivity and thus for food security. The EU-derogations for fallow land must not be continued in 2024 and beyond.

1 Jeroen Candel, PhD, expert on Agricultural Policy at Wageningen University, in an [interview](#) with Food Navigator Europe from 7 March 2022

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## 1. Environmental services within the framework of the CAP

The Common Agricultural Policy (CAP) aims to promote agricultural production in Europe and the supply of food, as well as to support rural development. Since 2013, the fight against climate change and the protection of the environment and biodiversity have also increasingly been mentioned as key objectives.

More than a third of the EU budget goes to the CAP; most of it in the form of area-based direct payments from the 1st pillar that is paid if farmers fulfil the cross-compliance requirements. Since 2014, farms above a certain size<sup>2</sup> have had to fulfil additional so-called "greening" requirements in order to be able to fully absorb these direct payments<sup>3</sup>. These requirements are intended to increase biodiversity in agriculture and improve the ecological condition. The greening requirements<sup>4</sup> for arable farmland consist of "crop diversification" – i.e. the main crop may not occupy more than 75 % of the arable land – and the establishment of "Ecological Focus Areas<sup>5</sup>" (EFA) on 5 % of the farm's arable land.

EFA are intended to increase biodiversity in the agricultural landscape by providing food and space for insects, birds and other threatened species. On the one hand, if farmland is part of the Natura 2000 network, and on the other hand, land that is taken out of production completely or partially as set-aside land can be counted as EFA. The latter are, for example, fallow areas on which no production and no use of pesticides or fertilisers may take place. Until 2023, land with catch crops and green cover crops that naturally supply the soil with nitrogen and contribute to humus build-up could also be declared as EFA.

This helps to improve soil fertility and soil health, supports biodiversity and binds climate-damaging CO<sub>2</sub>. The cultivation of insect-pollinated plants is also desirable. For bees and other pollinating insects, for example, honey fallows provide habitat and food.

The potential of ecological focus areas for the protection of the environment, biodiversity and the preservation of soil health and fertility is undisputed. Equally undisputed is the fact that the proportion of such areas in the EU is far too small to have the desired positive effects to a sufficient degree. In the negotiations for the new CAP period, [3,600 scientists](#) as well as the Commission demanded to make the CAP more ambitious in order to meet the objectives of the European Green Deal. But the result agreed upon by the European Parliament and the Member States in autumn 2021 fell far short of these expectations.<sup>6</sup>

Shortly after the outbreak of the war in Ukraine came the next step backwards. Under pressure of loud demands from parts of the European Parliament and the Council, the EU Commission lifted the greening requirements (that had lacked ambition before) for arable farming on 23 March 2022 by [Implementing Decision 2022/484](#). This allowed Member States to release EFA for food and feed production, pesticide use and grazing. The entitlement to greening payments (these amount to up to 45 % of the basic premium from Pillar 1) should remain unaffected.

2 In the CAP period from 2014 - 2022, farms with more than 15 hectares of arable land had to establish 5 % of their arable land as EFA in order to receive greening payments.

3 The greening payment is granted in addition to the basic premium per hectare of eligible land at a rate of approximately 45 % of the basic premium.

4 CAP period from 2014 - 2020, which was prolonged until 2022 (included).

5 Ecological focus areas are fallow land and set-aside land according to GAEC 9 of the CAP funding period 2014 to 2020, which has been extended up to and including 2022. GAEC stands for standards for maintaining agricultural land in "Good Agricultural and Ecological Condition". These are requirements (cross-compliance and greening) that farmers must fulfil in order to receive direct payments under the first pillar of the CAP.

6 Voting down the Earth: <https://www.birdlife.org/news/2021/11/16/cap-ep-agriculture-voting-down-the-earth/>

## 2. Politics against scientific consensus

The abolition of crop diversification and the release of set-aside land for production (and the use of pesticides was demanded by (predominantly) conservative agricultural ministers from the Member States, by conservative MEPs and by agricultural interest groups. In the face of a looming food crisis triggered by the start of the war in Ukraine on 21 February 2022, such measures would be vital, they argued. Scientists countered that such measures *"would not protect against the current crisis, but rather exacerbate it and make it permanent"*.

### 2.1 The "empty plate" argument of the agricultural lobby and its political allies

The first to call for a suspension of the CAP's greening requirements was the German Farmers' Association (DBV) on 26 February, followed by the French agricultural lobby FNSEA on 2 March. Similar statements were made in other Member States. On 6 March, the European umbrella organisation COPA-COGECA demanded:

*"Everything must be done to prevent disruptions in supply chains that will inevitably lead to shortages in certain parts of the world. This is an essential issue of food sovereignty and democratic stability." [...] "We must be able to farm all available land in 2022 to compensate for the blockage of Russian and Ukrainian production."*

Two days later, Herbert Dorfmann, the agricultural spokesperson of the European People's Party (EPP), [opened](#) a series of calls to the EU Commission to ensure food security in Europe. As *"the Russian attack on Ukraine will most likely have a strong impact on European food security, the European population needs to be reassured that this war will not lead to empty plates in Europe"*, said Dorfmann.

His colleague and Chair of the Agriculture Committee in the European Parliament, Norbert Lins (CDU), [added](#) that *"every tonne more of wheat in the EU this year [...] is not only a tonne more for food security in the EU and the fight against hunger in the world. It is also a tonne more against Putin and for strengthening democracy and freedom."*

In Austria, too, there was heavy lobbying for a suspension of greening measures under the CAP, using the argument of a lack of bread grain. On 8 March 2022, it was MEP Simone Schmiedtbauer (EPP) who rushed ahead with a [dispatch](#) and strengthened her demand to the EU Commission with the impressive image of 45,000,000 loaves of bread as Austria's contribution to food security in Europe and the world, not taking the facts too seriously<sup>7</sup>:

*"The armed conflict in Ukraine is leading to massive shortages of agricultural commodities, especially wheat, on which Europe is heavily dependent. [...] I urge the Commission to temporarily release set-aside EU farmland for food production instead of further increasing set-aside. In Austria alone, an additional area of around 7,800 hectares could be cultivated in this way, on which around 27,000 tonnes of wheat could be grown. The approximately 45 million loaves of bread that could be baked with it would be an important contribution to food security in Europe and in the world."*

The next day, her party colleague and Member of the Austrian Parliament, Georg Strasser, who is also President of the Austrian Farmers' Union, followed up in the "[Bauernzeitung](#)" and also launched a broadside against the Green Deal:

*"We need every square metre of soil. [...] Farmers are now responsible for supplying Europe with grain and, beyond that, for supplying Ukraine's previous grain-consuming countries, such as those in North Africa. [...] Setting aside valuable farmland now, as the EU's Green Deal proposes, on the other hand, jeopardises security of supply and would exacerbate a humanitarian crisis."*

7 Schmiedtbauer's claim that "Europe is heavily dependent on wheat" is factually incorrect. The EU is a net exporters of wheat.

The then Minister of Agriculture, Elisabeth Köstinger, was not sparing with catchy images like missing grain in North Africa and with buzzwords like food production, food aid and food supply at the [Agriculture Council](#) on 21 March 2022:

*"You must know that the World Food Programme, especially in Western Ukraine, is making massive use of agricultural land in order to carry out food production there for North Africa. This means that in the next few months of the year, or even beyond, we have to assume that there will be a shortage of grain, especially for food aid worldwide, and that there will be a shortage of food, which is very important. That is why we, above all from the Austrian side, are calling on the EU Commission to release the areas that are now set aside, fallow land, for food production in the European Union. On the one hand, for the food supply in Europe and on the other hand, of course, to be able to compensate for the harvest losses that we have to reckon with in Ukraine".*

Even after the Commission gave in to the pressure of the agricultural lobbyists and suspended the greening measures (and was [criticised](#) for this by renowned scientists and NGOs), the lobbyists continued their rejection of the Green Deal: Josef Moosbrugger, President of the Austrian Chamber of Agriculture, said in a [press release](#):

*„In view of the dramatically strained markets in various sectors, we should not risk additional shortages under any circumstances. We need food to feed ourselves and also biomass to replace fossil, climate-damaging gas. We are therefore vehemently opposed to further massive de-utilisation of forestry and agricultural land, as envisaged in various European and national strategies".*

Köstinger's successor as Austrian Minister of Agriculture, Norbert Totschnig, was full of praise for the suspension of the greening measures and was pleased to announce a continuation of the derogation in 2023 in a dispatch soon after taking office, namely on 26 July 2022:

*"The European Commission has proposed the extension of fallow land use. As the EU allows continuing to use fallow land for agricultural production in 2023, we are making an important contribution to global food security. Every additional tonne of grain and food is crucial."*

The next push on the suspension of greening requirements took place on 29 March 2023, again with active Austrian participation<sup>8</sup>. It was the [letter](#) of the German MEP and Chair of the Agriculture Committee, Norbert Lins (CDU) to the President of the European Commission, Ursula von der Leyen:

*"... the war, the export of food as well as food security will rather develop for the worse, persistent droughts are visibly worsening the global situation. The global food shortage will continue to occupy us for the next few years" – "With another far-reaching decision to suspend crop rotation and, above all, set-aside obligations within the CAP, the Commission once again has a building block in its hand to ensure that Europe and our agriculture contribute to alleviating the situation." – We hereby call on you to join us in securing the suspension of crop rotation (GAEC 7) and especially set-aside of four percent of agricultural land (GAEC 8) within the Common European Agricultural Policy for the years 2024 and 2025."*

This demand found a majority at the European People's Party Assembly on 5 May 2023 in Munich as part of its so-called "Farmer's Deal".

It is striking that the above demands were consistently articulated by politicians and interest groups who had already called for a suspension of the Farm to Fork strategy two years earlier. At that time, their arguments referred to the Covid pandemic. Today, the war in Ukraine serves as an argument for the same goal.

8 In addition to numerous German party colleagues of Norbert Lins, the two Austrians Simone Schmiedtbauer and Alexander Bernhuber as well as the spokesperson of the EPP in the Committee on Agriculture, the South Tyrolean Herbert Dorfmann, were co-signatories.

## 2.2 The (ignored) warning of Science

Clear opposition to the "empty plate" argument (and related food security narratives) came from the scientific community. In an interview with Food Navigator Europe, the Dutch expert on European Agricultural Policy, Jeroen Candel from Wageningen University explained:

*„Food security is a very appealing argument that plays on our most fundamental fears. However, the food security discourse is not entirely genuine. Within the EU it is a very cynical argument to undermine sustainability ambitions and does not do justice to the real food security concerns that relate to access rather than supply“*

Candel added:

*„Those now making food security arguments are often the same as those who oppose more generous social programmes that would address food security in the EU.“*

Together with the German agricultural economist Sebastian Lakner and the Israeli ecologist Guy Pe'er, Candel was also one of the initiators of an Open Letter to the European Commission, in which the three scientists pointed to obvious negative effects of such measures on climate and biodiversity, while the "validity for production" of the claimed measures is questionable.

*We "wish to express our deep concern in light of various political actors currently calling to reopen the Farm to Fork and reverse important environmental elements of the CAP. We must warn that these calls are not aligned with science and the evidence of cause and effects, nor with the actual uses of land in Europe."*

*„With >70 % of the EU agricultural area being used for feed and fuel, and with significant feedstuff-imports from abroad, the EU demand has a major effect on global markets. If demands are altered smartly, this can be used to absorb the short-term shock, and at the same time to address a possible food-shortage in 2022/3. Here it is essential to question the substantial conversion of grains into fodder and biofuels, whereas they could be used for human consumption.“*

The scientists recommended to the Commission a series of measures aimed at making better use of the resources we have to produce more food and less feed – measures that are, according to the scientists, "fully consistent with the Farm to Fork and Green Deal strategies".

Support for their arguments came shortly afterwards from the "Potsdam Statement" in which [more than 660 scientists](#) stated that in view of the war in Ukraine, Europe needs a transformation of the food system more than ever. The scientists warned against

*"political efforts to abandon the sustainability goals of the Farm to Fork strategy (including the reduction of greenhouse gas emissions, the reduction of nitrogen fertiliser and pesticide use and the protection of fallow land for biodiversity)"*

and stressed that such efforts

*"do not protect us from the current crisis, but rather exacerbate it and make the crisis permanent. Global warming and ecosystem decline are already affecting crop yields and livelihoods worldwide, a situation that will worsen significantly without ambitious mitigation strategies".*

Josef Settele, co-chair of the Global Assessment of the World Biodiversity Council IPBES, also member of the Environmental Advisory Board of the German Government SRU, and one of the 660 signatories of the Potsdam Declaration, explained in detail at a [press conference](#) organised by the Austrian environmental organisation GLOBAL 2000 why it is necessary for the restoration of biodiversity in Europe to expand and not reduce such areas.

But against all scientific recommendations, the Commission finally gave in to the persistent demands of the agricultural lobby and its political allies, who then launched further attacks on the Farm to Fork strategy (demand for an additional Impact Assessment).

Once again, the scientific community spoke out, with [730 renowned scientists](#) who reiterated in an appeal to decision-makers that

*“the long-term challenges for the EU food system and the state of biodiversity have not changed since the outbreak of the war in Ukraine” and that „the Farm to Fork and Biodiversity Strategies’ objectives therefore remain „of utmost importance to stop and reverse the decline of biodiversity“*

### 3. A fact check on the Food Security argument

#### 3.1 Use of EFA-derogations in the EU

In March 2023, the EU Commission (DG AGRI) had presented data<sup>9</sup> on the uptake of greening derogations for the first time at a stakeholder event to which the NGOs BirdLife and Friends of the Earth took part.

According to these data, 21 Member States made use of the derogation for ecological focus areas in 2022 (see Table 1) and – with the exception of the Walloon part of Belgium – also allowed the use of pesticides (plant protection products) on these areas. According to the Commission, the six Member States that did not make use of the derogations in 2022 were Denmark, Ireland, the Netherlands, Malta, Romania and Germany, with Germany playing a special role: The German Ministry of Food and Agriculture (BMEL) stated that it saw the derogations granted by the European Commission "rather critical" and with regard to biodiversity objectives as a "very far-reaching approach". The BMEL maintained the ban on pesticide use and agricultural production on ecological focus areas, but brought forward the date for a possible grazing and harvesting of fallow land and catch crops by one month<sup>10</sup>.

In those 21 Member States that allowed EFA management, a total of 112,000 farms made use of the derogation. This corresponds to 37% of the farms that had declared such areas. The degree of utilisation varied greatly between the Member States. The exact figures are shown in the following table.

**Table 1:** Derogation for land lying fallow (LLF) declared as ecological focus area in 2022 (PPP = plant protection products)

MS*	Application of Article 1(2) decision to allow the use of PPP on those areas	Number of farms applying derogation EFA-LLF	Total number of farms with LLF under EFA	Share of farmers applying derogation	Number of hectares LLF used under derogation EFA	Total area LLF to fulfil EFA obligation	Share of area
BE-FI	x	325	617	53,00 %	1,478	1,770	84,00 %
BE-W		53	444	12,00 %	158	645	25,00 %
BG	x	7,621	9,292	82,00 %	28,236	105,584	27,00 %

9 The information is taken from the PowerPoint presentation "State of play of the implementation of the greening derogations for 2022" presented by DG AGRI at a stakeholder event on 17 March 2023.

10 The German Federal Ministry of Food and Agriculture (BMEL) put forward the date from which grazing and harvesting of ecological focus areas would be allowed from 1 August 2022 to 1 July, as it had already done in the drought years 2018 and 2019. <https://www.bmel.de/DE/themen/landwirtschaft/eu-agrarpolitik-und-foerderung/ukraine-oekologische-vorrangflaechen.html>



CZ	x	65	644	10,00 %	662	7,062	9,00 %
EE	x	241	349	69,00 %	4,692	6,522	72,00 %
EL*	x						
ES	x	24,880	88,754	28,00 %	169,492	631,094	27,00 %
FR	x	21,746	69,556	31,00 %	107,325	335,777	32,00 %
HR*	x						
IT	x	5,533	25,871	21,00 %	21,692	78,794	28,00 %
CY*	x						
LV	x	1,991	3,659	54,00 %	18,108	36,353	50,00 %
LT	x	7,196	20,607	35,00 %	51,593	103,406	50,00 %
LU	x	49	125	39,00 %	53	159	34,00 %
HU	x	24,022	30,978	78,00 %	304,377	355,897	86,00 %
AT	x	5,445	7 672	71,00 %	11,725	18,557	63,00 %
PL	x	11,601	27.704	42,00 %	44.001	92.448	48,00 %
PT	x	397	3.016	13,00 %	2.354	16.677	14,00 %
SI*	x						
SK	x	203	1.408	14,00 %	2.077	25.111	8,00 %
FI	x	946	4.666	20,00 %	3.176	21.498	15,00 %
SE*	x		8.294				
<b>EU total</b>		<b>112.305</b>	<b>303.656</b>	<b>37,00 %</b>	<b>771.199</b>	<b>1.949.034</b>	<b>40,00 %</b>

\* 5 Member States (EL, HR, CY, SI, SE) had not yet submitted their data by March 2023, according to the Commission

The derogation was widely adopted: 771,199 hectares – or 40 % of the approximately 1,950,000 hectares of available EFA – were lost to biodiversity in 2020 and used for production in 21 Member States.

### **Less biodiversity, more feed**

Next, we turn to the question of the extent to which this production actually contributed to the provision of food. After all, this was the main argument conservative politicians and lobbyists used to fight for the suspension of greening requirements.

Therefore, the EU Commission's answer to this question is somewhat perplexing: Neither wheat or rye – nor any other bread grain – are among the main crops to be cultivated in ecological focus areas in 2022, but rather maize and soybeans as well as the oilseed sunflower. Only in Nordic member states would a significant share have been used for wheat production, according to the Commission. However, more precise information on the crops cultivated in the member states (acreage, harvest quantities) was not available to the Commission or was not presented.

For Austria, which had particularly vehemently demanded the release of EFA, corresponding figures are, however, available, as GLOBAL 2000 had submitted a corresponding request under the Duty to Provide Information Act and the Environmental Information Act to the Ministry of Agriculture in March 2023.

### 3.2 The case study Austria

The figures presented below are taken from the ministry's response to GLOBAL 2000's Environmental Information Act ("Umweltinformationsgesetz" – UIG) request and were supplemented with data from Statistics Austria 2022 for the calculation of crop yields. According to the Ministry of Agriculture, the exemption was used on a total of 11,747 ha in Austria, with a total of 5,457 Austrian farms making use of the exemption.

#### EFA use for wheat below the percentile range

The data of the Ministry of Agriculture largely<sup>11</sup> correspond to the Commission's figures with regard to the number of farms and areas with EFA exemptions (see Table 1). In particular, they confirm the minor EFA share of the cultivation of food, especially bread grain: with maize and soya, fodder was also among the main crops in Austria. Together, maize and soya occupied 72 % of the previous EFA. Bread cereals such as wheat and rye, on the other hand, were produced on only 0.6 % of the converted EFA.

**Table 2: Crops on areas affected by the derogation in 2022**

Arable crops	Cultivated area [ha]	Share of exceptional area [ha]
Wheat	65	0.6 %
Barley	227	1.9
Grain maize	5,148	43.8 %
Rye	7	0.1 %
Oat	277	2.4 %
Fodder legumes	42	0.4 %
Silage maize	1,659	14.1 %
Dry pulses, excl. soybeans	240	2 %
Soybeans	1,622	13.8 %
Sunflower	74	0.6 %
Rapeseed	1	0
Temporary grassland harvested	1,983	16.9 %
Temporary grassland grazed		-
Other	402	3.4 %

If these areas are compared to the average yield figures of Statistics Austria for the year 2022, the estimated harvests are as follows: 4,250 tonnes of soybeans, 50,553 tonnes of grain maize, 77,923 tonnes of silage maize<sup>12</sup>, but only 375 tonnes of wheat. There is little sign of the 45 million loaves of bread (produced from 27,000 tonnes of wheat) promised by MEP Simone Schmiedtbauer as an important

11 The slight deviation of the data of the Austrian Ministry of Agriculture (5,457 farms with 11,747 ha EFA under derogation) from the data in the presentation of the EU Commission (5,445 farms and 11,725 ha) was explained by the Ministry at the request of GLOBAL 2000 by the fact that the crop diversification is to be fulfilled by farms with 10 ha or more of arable land and the EFA obligation for farms with 15 ha or more of arable land. In the Ministry's response, all farms that had claimed an exemption had been taken into account.

12 For grain maize, only the grain spindle is harvested. For silage maize, the whole plant is harvested and ensiled.

contribution to food security in Europe and the world. Austria's additional 2022 wheat production corresponds to one slice of bread per Austrian per year.

### The losers: bees, climate and healthy soils ...

GLOBAL 2000 also asked for figures about the kinds of 2021's arable land and crops affected by the derogation to which degree. According to information from the Ministry of Agriculture, the total amount of ecological focus areas available in Austria decreased from 29,169 hectares in 2021 to 12,860 hectares in 2022, which is a minus of 56 %. By far the biggest loser was the cultivation of catch crops (minus 84 %), followed by nitrogen-fixing crops (minus 48 %), honey fallow (also minus 48 %) and fallow land with a minus of 15 %, as the following table shows.

**Table 3: Comparison of ecological focus areas (EFA) 2021/2022**

EFA – measure	Area in 2021 [ha]	Area in 2022 [ha]	Difference [%]
Catch crops	14,391	2,237	-84
Nitrogen fixing crops	5,245	2,732	-48
Honey fallow	933	488	-48
Land lying fallow	8,134	6,951	-15
others	466	452	-3
<b>Sum of EFA</b>	<b>29,169</b>	<b>12,860</b>	<b>-56</b>

The above figures show a sharp decline in measures that add nutrients to the soil, contribute to the build-up of humus or provide habitats for pollinating insects. The clear losers of this derogation are thus the health and fertility of agricultural soils, climate protection and pollinating insects, and thus the essential pillars of sustainable agricultural production capacity.

### So, who are the winners?

The year 2022 brought a nominal increase in income for Austria's farmers of 25.5 % compared to 2021.<sup>13</sup> This was mainly due to the increased world market prices for agricultural products as a result of the war in Ukraine. To what extent the "double" use of set-aside land – for greening payments with simultaneous production – contributed to the increase in earnings is not known. If it was a relevant contribution, then these quite doubtful benefits – viewed holistically – were distributed quite differently among Austria's nine federal provinces, as the following table shows:

**Table 4: Utilisation of the EFA exemptions by federal province**

(OVF-Ausnahmen = EFA affected by derogation, Anzahl Betriebe = number of farms applying for derogation)

	Burgenland	Carinthia	Lower Austria	Upper Austria	Salzburg	Styria	Tyrol	Vorarlberg	Vienna
EFA-Derogation (ha)	57	822	<b>2839</b>	<b>5817</b>	21	<b>2154</b>	37	0	0
No of Farms applying for derogation	8	321	<b>1221</b>	<b>2676</b>	13	<b>1199</b>	19	0	0

While in the federal provinces of Vorarlberg, Tyrol, Salzburg and Burgenland no or only very few farms made use of the derogation, the lion's share, namely 92 % of the ecological focus area lost throughout Austria (10,810 ha) is concentrated in only three federal provinces: Upper Austria, Lower Austria and Styria, the three largest producers of fodder maize. In Upper Austria and Styria, particularly few farms apply for the agro-environment measure (AECM) "biodiversity areas" from the 2nd pillar of the CAP<sup>14</sup>. This means that particularly in these intensively managed provinces, the sharp decline in the first pillar is even more harmful for biodiversity and the environment.

#### 4. Summary and conclusions

The data on crops grown on Ecological Focus Areas (EFA) in Austria and the EU expose the argumentation of the agricultural lobby and its political allies as a sham: Although the cultivation of wheat against impending hunger was argued for production on EFA, these areas almost only produced livestock feed.

In summary, our analysis shows:

- Although hundreds of scientists from all over Europe recommended, in line with the Farm to Fork Strategy, a reduction in feed production in favour of increased food production – and on existing arable land – the exact opposite has been implemented: Feed production has been increased on land that was supposed to protect the environment and biodiversity.
- At no time was there a serious threat to food security in the EU. Europe is a net exporter of wheat and meat. Over 70 % of arable land is used for feed and fuel production.
- The exemptions from the greening requirements of the CAP run counter to the protection of pollinating insects, the improvement of agricultural soils and the protection of the climate, and thus against three essential pillars of agricultural production capacity. Ultimately they will harm farmers the most.
- With the measures taken, EU agricultural policy has fuelled the very aspect of European agriculture that is most problematic in terms of climate and environmental impact, namely the overproduction of livestock (beef, poultry and pork) in the EU.
- In a nutshell, the agricultural lobby and its political allies have successfully undermined the sustainability measures of the CAP and the Green Deal with the argument of threatened food security that appeals to our most basic fears. But the EFA derogations obtained in this way did nothing to address the real hunger that exists in the Global South – in fact, they distracted from the real causes and real solutions. They only served the short-term economic interests of a few and were at the expense of society and the environment.

The science is very clear. In order to maintain agricultural productivity in the future, a minimum of 10% of agricultural land must be dedicated to biodiversity. BirdLife Europe, Arbeitsgemeinschaft bäuerliche Landwirtschaft, Corporate Europe Observatory, GLOBAL 2000 and the Organisers of the ECI "Save Bees and Farmers" therefore call on the Commission to pursue this goal, which is laid down in the EU-Biodiversity-Strategy, and not to extend the harmful and counterproductive EU derogations for fallow land any further. The share of valuable land for biodiversity in Europe's agriculture must be increased!

<sup>14</sup> Farms that participated in the "Austrian Programme for Environmentally Sound Agriculture" (ÖPUL) from the 2nd pillar of the CAP (AECM), and took the measure "environmentally sound and biodiversity-promoting management" (UBB) there, were obliged in 2022, with a few exceptions (e.g. small farms), to make 5 % of the arable land available as biodiversity area. These ÖPUL biodiversity areas can also be counted as EFA in the first pillar. However, they are excluded from the derogation. In Upper Austria and Styria, however, the number of farms that do not participate in ÖPUL and therefore do not need the 4 % EFA for accounting them elsewhere is above average. Therefore, the sharp decline in these areas that had been rather poor in biodiversity before is particularly painful.