The first pillar direct payments in the next CAP (post 2015) A French point of view

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Introduction

On October 12th 2011. the European Commission (EC) presented a set of legislative proposals intended for a new reform of the Common Agricultural Policy (CAP). The communication from the EC entitled "The Europe 2020 Strategy" (EC 2010) has played a structuring role with regard to the proposed CAP reform. While falling within the framework of the Treaty of Lisbon, applied on December 1st 2009, the Europe 2020 strategy considers that three objectives should guide public action within the European Union (EU) over the coming decade: a smart growth based on innovation and knowledge; a sustainable growth based on an efficient use of natural resources; and an inclusive growth aiming at achieving a high rate of employment favouring social and territorial cohesion. By contrast with the past CAP reforms, the influence of multilateral agricultural negotiations at the World Jel Classification: Q18

<u>Abstract</u>

This paper proposes an assessment of October 2011 legislative proposals for CAP reform. The assessment is essentially qualitative, illustrated by static simulations of income effects for French professional farms. It uses the French case to highlight the diverging opinions between stakeholders on these proposals and argue why they are a step in the right direction but a too timid step as crucial issues are not adequately addressed. Furthermore several key parameters of the reform remain unknown, even after the European parliament decisions (January 2013). We first summarise the main elements of the proposals presented by the European Commission regarding the first pillar subsidies. We then highlight the main points that are subject to debate on the basis of French stakeholder reactions (public authorities, farmers' unions, food companies and non-governmental organisations). We finally propose an assessment of these proposals focusing more specifically on the redistribution of direct payments between countries and categories of farms.

Keywords: CAP, payment agreements, subsidies, farms, France.

<u>Résumé</u>

Dans cet article, nous allons parcourir les propositions législatives présentées en Octobre 2011 pour la réforme de la PAC. L'évaluation sera essentiellement qualitative et illustrée par des simulations statiques des effets sur le revenu pour les exploitations professionnelles en France. La France sera retenue comme cas d'étude pour mettre en évidence les opinions divergentes des acteurs sur ces propositions et indiquer pourquoi elles sont un pas dans la bonne direction, un pas trop timide cependant, étant donné que des questions cruciales n'ont pas été abordées d'une manière appropriée. En outre, de nombreux paramètres clés de la réforme restent inconnus, même après les décisions du Parlement européen (janvier 2013). Dans un premier temps, nous allons résumer les éléments principaux des propositions présentées par la Commission européenne concernant les aides du premier pilier. Ensuite, nous allons souligner les points principaux qui donnent matière à discussion compte tenu des réactions des acteurs français (pouvoirs publics, organisations de producteurs, entreprises agro-alimentaires et organisations non-gouvernementales). Pour finir, nous allons présenter une évaluation de ces propositions en mettant l'accent plus spécifiquement sur la redistribution des paiements directs entre pays et catégories d'exploitations.

Mots-clés: PAC, accord de paiement, aide, exploitation agricole, France.

Trade Organisation (WTO) was much less decisive.

Following the first EC proposals (October 2011), some modifications were adopted by the European Parliament in January 2013 (Roederer-Rynning, 2012; De Castro *et al.*, 2011). As a result, it is not certain that the new CAP will be

re however in continuity with those adopted in the context of the continuous process of CAP reform started in 1992 (the McSharry reform), and continued in 1999 (Agenda 2000), 2003 and 2008 (CAP Health Check). The new proposals, in which the subsidiarity principle features prominently, might lead to a significant reorientation of direct aids between regions and categories of farms within a given Member State (MS), notably in a country like France where the historical reference model is used for allocating the

applied on the expected date, that is at the beginning of 2014 (Horseman, 2012). Moreover, since February the 8th 2013, some decisions were taken regarding the EU financial framework for the 2014-2020 period. They include a small decrease of the agricultural budget comparatively to the period 2007-2013. In a verv difficult economic situation, these budgetary decisions for the next CAP have been considered as a success for the EU Commissioner for Agriculture and for agricultural interests in general. However they will only be binding after a process which requires adoption by the Parliament.

Besides simplification and efficacy, the stated objectives of the next CAP reform are to favour a competitive and sustainable European agricultural sector, and to give a boost to rural zones. As innovative as they may be, these proposals a-

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Single Farm Payments (SFP). By contrast, the allocation of CAP funds between the different MS is only marginally modified.

The October 2011 legislative proposals relative to the future CAP come in the form of four regulations regarding, respectively, direct payments, rural development, the common market organisation and the financing, management and monitoring of the CAP (EC 2011-a-b-c-d). They also include three specific regulation drafts which contain measures aiming at ensuring the transition towards the new rules. The proposals confirm the CAP structuring into two pillars with however the asserted and posted intention to improve the synergies between them. According to the EC, the measures of pillar I are compulsory, annual and apply on the whole EU territory while those of pillar II are voluntary, multiannual and adapted to national and regional specificities in the framework of an EU menu declined in each MS. In practice, this distinction is largely artificial.

1. An intra-country redistribution of direct payments and a better environmental targeting

As from 2015, substantial modifications would be made to the rules governing the allocation of first-pillar direct payments. Despite a common legislative framework, SFPs are today assigned in very heterogeneous ways from one country to the other. The 12 MSs which joined the EU in 2004 or 2007 benefit from a simplified Single Area Payment Scheme (SAPS) based on lump-sum transfers per hectare for all farmers. In the EU-15, the Single Payment Scheme (SPS) varies among countries as many options have been left to national governments (Rutz, 2012): they could choose the application date (2005, 2006 or 2007), the degree of decoupling (or, in other words, the payments that could be maintained coupled) as well as the model used for calculating and allocating decoupled aids (on the basis of individual historical references or uniform payments per hectare, with the possibility to opt for hybrid combinations between these two extreme options).

The SFP should be gradually dismantled and the current first-pillar scheme replaced by a new architecture of aid in eight points. In each MS, the funds assigned to the first pillar would be capped for each calendar year over the period 2014-2019.

i) A basic payment. In each MS, the funds assigned to the basic payment will be determined by subtracting the budgetary resources allocated to the other measures of pillar I from the annual national ceiling.

As it is the case for the current SFP, the basic payment will be implemented in the form of payment entitlements per hectare allocated on a national or regional basis in proportion to eligible hectares. It will be granted to farmers under conditions, that is the respect of basic requirements as regards the environment, the maintenance of farmland in Good Agricultural and Environmental Conditions (GAEC), public, animal and plant health, as well as animal welfare. In a country like France where the SFP is allocated on the basis of individual historical references, the major innovation lies in the fact that by 2020, this basic payment will be uniform for all eligible hectares, in contrast with current SFPs which vary greatly within the same *département* or region, mainly according to agricultural specialisation and, for a given production, to technical systems adopted. To avoid a redistribution of direct aids that should be too detrimental to certain categories of farms in the short term, this standardisation will be spread over the period using the socalled dynamic hybrid model.

In each MS, the geographical level retained for implementing the basic payment scheme is a particularly strategic choice as it directly determines the budgetary redistribution among farms, territories and regions. This is particularly true in France where farm specialisation varies greatly between areas of production. In accordance with the subsidiarity principle, each MS can decide whether to apply the basic payment scheme at a national or regional level. If it retains the regional option, the MS has to define the typology of regions according to objective and non-discriminatory criteria such as their agronomic and economic characteristics, their regional agricultural potential or their institutional or administrative structure. This means that the MSs are only slightly restricted as regards the indicators to be selected to proceed to the definition of the regions.

ii) An additional green payment. On top of the basic payment, a per-hectare additional payment will be allocated to farmers who use agricultural practices considered as beneficial to the climate and the environment. This green payment, which will represent 30% of the annual national ceiling, will be granted to each farmer under the condition that she/he respects the three following criteria (organic farming is automatically eligible):

- For farms with more than three hectares of arable crops, a minimal crop diversification is required: the cropping system will include three crops as a minimum, the largest crop will not exceed 70% of the arable area and the smallest crop will not be lower than 5%.

- Farmers will permanently maintain grass cover on the areas registered as permanent grassland in 2014 (with a "small" margin of manoeuvre limited to 5%).

- As from 2014, farmers will have to ensure that at least 7% of their eligible area (except permanent grassland) is devoted to ecological infrastructures such as land set-aside, terraces, buffer strips, wooded areas, hedges, etc.

iii) A second additional payment for the farms located in areas subject to natural constraints. This second additional payment is optional and could represent up to 5% of the annual national ceiling. It will be paid per hectare only for farms that are located in areas subject to natural constraints (the definition of corresponding areas is currently under revision); it will be implemented, at the MS discretion, at a national or regional scale.

iv) Payments coupled with specific productions. On top of the three payments defined above, an MS who so wishes could also grant payments linked to specific productions, within the limit of 10% of the annual national ceiling (except in specific circumstances that should be accepted by the EC, notably when coupled payments currently in place exceed this 10% limit). This option should allow a country to maintain the suckler cow premium scheme. Moreover, conditional upon acceptance by the EC (which inevitably will be very careful on this point given the WTO rules on domestic support), the principle of aid coupling could be extended to other agricultural productions considered as sensitive. In France, the SFP (including funds granted under the so-called Article 68) was 7.17 billion Euros in 2010 and coupled payments were equal to 1.04 billion Euros (of which 662 million Euros just for the suckler cow premium).

v) A specific payment for young farmers. This specific payment, which could represent up to 2% of the annual national ceiling, is limited to people aged under 40 at the time of the application and who are setting up a farm (or did so over the five years preceding the application). It will be allocated for the five years following the set-up. Compared with what these young farmers would have received without the measure, this specific payment corresponds to a 25% increase in the value of basic payments per hectare. However it is limited to a maximal area per farm that varies depending on the country. To grant payments to producers who start farming, each MS will implement a national reserve by application of a linear levy on the annual ceiling of first-pillar direct payments; the rate of the levy will not exceed 3% and the reserve will be implemented at national or regional scale.

vi) A specific scheme for small farmers. The objective of this specific scheme is clearly to simplify procedures and reduce administrative costs. It is more specifically tailored for the new EU-12 MS. Farmers who wish to benefit from this measure should declare before October 15th 2014. They would receive a lump-sum payment per farm between 500 and 1000 Euros, depending on criteria defined by each MS, instead of all other forms of first-pillar direct payments. The funds allocated to this scheme will not exceed 10% of the annual ceiling.

vii) A capping of first-pillar direct payments. The latter will be reduced by 100% for the bracket exceeding 300,000 Euros, 70% for that between 250,000 and 300,000 Euros, 40% for that between 200,000 and 250,000 Euros and 20% for that between 150,000 and 200,000 Euros. In order to take into account the contribution to employment, farms could deduct the effectively paid salaries, including taxes and employers' contributions, from the reference tax basis.

viii) The limitation of the new scheme to active farmers only. The proposals include a definition of who can be considered as an active farmer. In addition, an MS will pay no more direct aids to the farms which have an eligible area lower than one hectare and to those for which the annual amount of first-pillar direct aids is lower than 100 Euros.

2. First reactions from French stakeholders: business as usual

In France like in other EU countries, reactions to the release of the legislative proposals for the next CAP came very quickly. They were numerous, from an extended set of stakeholders. They were conventional in the sense that the official stance adopted by a given actor could easily be anticipated (Bureau, 2010; Gravey, 2012). As required by the CAP reform "game", reactions have usually been rather negative. For every actor, it is in effect natural not to get too enthusiastic over the positive aspects and instead to focus criticism on the points that are considered insufficient or to be improved in order to influence the decision process and try to have the cursors move in favour of own interests and acquired advantages.

The French public authorities consider that the future CAP budget must be set at a level which is compatible with the declared ambitions. On the other hand, they also claim that the redistribution of agricultural aids between EU countries must be sustainable and fair, which means that the inter-country re-allocation can be marginal only. While confirming France support for the principle of the greening, the Minister imposes limits by underlining that it must correspond to the economic reality of the farms and include simplification. Regarding the convergence of first-pillar direct aids within each MS, the Minister agrees that this is a legitimate ambition in the long term which however requires giving countries the necessary flexibility as to the calendar and the modalities of application. For example, the new French Minister Stephane Le Foll would like to increase the amount of decoupled payment per hectare for the fifty first hectares per farm to better take into account the size and employment in the CAP. He also indicates that France will use the possibility of focusing aids on some least-favoured sectors and regions.

The main farmers' union (FNSEA for Fédération Nationale des Syndicats d'Exploitants Agricoles), close to rightwing parties, denounces the relinquishment of the capacities for market management and of crisis situation answers through the decoupling of payments considered as sacred, an excessive greening of the first pillar (mainly through the obligation to assign 7% of land to ecological infrastructures) and a too sudden standardisation of first-pillar direct aids. The criticisms from the Permanent Assembly of Agricultural Chambers (APCA for Assemblée Permanente des *Chambres d'Agriculture*) go in the same direction which is not surprising given the current composition of this institution (numerous elected representatives are also members of the FNSEA). However the APCA recognises that the new crisis management tool constitutes progress. The criticisms from the Young Farmers' union (JA for Jeunes Agricul*teurs*) are less severe than those of their elders, mainly because of the provisions specifically focused on the younger generation. In the face of the Rural Coordination (CR for Coordination Rurale) denouncing a total abandon of EU

agriculture with a CAP focused only on the budget and environmental issues, the Farmers' Confederation (CP for *Confédération Paysanne*), close to left-wing and extreme left-wing parties, considers that the greening of the CAP is only a facade that will induce no change for 95% of the French farms (Roullaud, 2012). This farmer's union also considers that the standardisation is too slow and the redistribution of support too weak. In the same perspective, the environmental organisations argue that the greening is very insufficient and that the new CAP does not go far enough in environment and ecology.

The agricultural cooperatives (through the voice of their main association, Coop de France) and the French association of food-processing industries (ANIA for Association Nationale des Industries Alimentaires) declare that the CAP must first contribute to protecting and enhancing the competitiveness of the agriculture and food sectors in an international environment which is more and more open. The specialised union of sugar-beet producers (CGB for Confédération Générale des Planteurs de Betteraves) denounces the cancellation of the sugar regime and expresses its strong determination to thwart this measure considered as unacceptable. The ORAMA union which includes three sub-associations of the FNSEA specialised in, respectively, wheat (AGPB), corn (AGPM) and oleaginous and proteagenous crops (FOP), claims that it will be particularly watchful about the evolution of support and its consequences, and refuses the obligation to reserve 7% of farmland for biodiversity. While the FNSEA specialised association of milk producers (FNPL) wonders about the means to regulate the milk sector without quotas, that of bovine meat producers (FNB) dreads a possible withdrawal of the Suckler Cow Premium (SCP). As for fruit and vegetable producers who, up to now, benefited from the CAP, the opinions expressed are more favourable.

All these reactions give an irresistible impression of " $d\acute{e}_{j\acute{a}} vu$ " with, as expected, stakeholders agreeing on longterm issues but not on short-term orientations and tools as soon as they can be contrary to their objectives and/or acquired advantages. On this point, France is not an exception.

² Other economists are much more radical, for example Koester (2012) who concludes that there is no justification of changing current direct income payments to basic direct income payments and furthermore, the justification presented by the EC is based on inadequate information. See also Tangerman (2010).

3. A qualitative assessment illustrated by static simulations of possible redistribution effects for French professional farms

In a general way, we think that the October 2011 legislative proposals for the CAP are an additional step, after those of 1992, 1999, 2003 and 2008 (Loyat, 2012), in the right direction. They are not very far from the spirit of normative recommendations put forward by other French agricultural economists (Bureau and Witzke, 2010; Mahé, 2012). However we consider that the step is too timid which means that this new reform of the CAP should be quickly followed by a more ambitious plan for the EU agricultural and food sector as well as for rural territories.

3.1. The redistribution of funds in favour of new MS is only timid

Despite the political pressure exercised by the various Eastern MS (and the fact that the Commissioner for Agriculture is Rumanian), the redistribution of funds between "old" and "new" EU countries should be only modest: around 740 million Euros when the proposals will be fully implemented (Matthews 2011). Beyond the political realism of the EC^1 , we do think that it is not legitimate to provide an identical level of decoupled support per hectare to all European farmers (Erjavec et al., 2011), this because they live in countries which are very heterogeneous in terms of economic development, farm incomes and agricultural production costs (Mahé, 2012). Beyond the treatment of "old" versus "new" MS, this question of identity of decoupled payments per hectare raises also at the level of each country within the envelope of the national ceiling as many payments of the first pillar can be implemented at the national or regional level, the definition of the region being left at the discretion of the MS under the condition that it defines the regions "in accordance with objective and nondiscriminatory criteria such as their agronomic and economic characteristics and their regional agricultural potential, or their institutional or administrative structure" (EC 2011b, Article 20).

3.2. The new architecture of the first pillar enhances the legitimacy of support, but still insufficiently in a medium-term perspective

At the end of the period of application of the reform, the basic payment per eligible hectare should be equal to approximately 150 Euros in average at the EU level (approximately 55% of the current SFP), with huge disparities between countries. It is not certain that the cross-compliance obligation is sufficient, at least in the medium and long term, to justify the amounts granted to farmers in that way². This is all the more true since it is not obvious that the simplification of cross-compliance, which leads to propose a cut in both the number of Statutory Management Requirements (from 18 to 13) and the number of standards relative

¹ The redistribution issue is highly political. On the one hand, the EC must sell the CAP reform to powerful "old" MS which are net contributors to the EU total budget and would very likely loose from a reorientation, even timid, of the CAP (France, Germany, the Netherlands and the United Kingdom). On the other hand, it must also sell the reform to the "new" MS of Eastern Europe which consider that the treatment should be the same for all EU countries. The margin of manoeuvre of the Commissioner for Agriculture is low all the more as he must also sell the CAP reform to other Commissioners in a context where their budgetary appetites are great but the economic situation of the EU particularly difficult.

to GAEC (from 15 to 8), does not have the effect of reducing the effectiveness of conditionality. Furthermore, in the new regime like in the SPS/SAPS, a larger farm will continue to receive greater amounts of decoupled payments than a smaller unit as the proportionality between the size of an operation (measured in hectares) and the total amount of decoupled payments (sum of basic payments and green payments over all eligible hectares) is not really broken; one can reasonably expect that the effects of capping will be only modest³.

By contrast, the other levels of the first-pillar architecture appear better justified. Even if, according to her/his position on the chequer board of objectives and interests, such or such actor can dispute such or such criteria, the latter have the great merit of existing: the green payments of the second level are justified because of increased environmental requirements; the territorial payments of the third level address more difficult production conditions in the least-favoured areas; and the coupled payments of the four stage can be justified because some productions could be too negatively disrupted by a full decoupling of the first pillar.

One can however legitimately wonder about the effectiveness of the greening scheme. For the sake of simplicity, the latter would be implemented in the form of three measures defined at the EU level, more or less pre-existent in at least some national regulations. Not only such a scheme does ignore local particularities, but its efficacy from an environmental and economic point of view is at least questionable compared to alternative solutions which would be more tailored to local characteristics and more flexible: definition of the three measures according to the local environmental context; transferable quotas of permanent grassland or ecological infrastructures at the scale of (small) territories so as to minimise implementation costs which very likely vary depending on the farm/region. In a more general way, the question raised by the greening as it is proposed by the EC is that it is based on production systems or production factors rather than on environmental results. There is here a large avenue for research in order to closely link agricultural practices and systems to the state of the environment so that it would be possible to base and assess the measures on the basis of results instead of production factors and/or techniques.

The possibility offered to each MS to maintain coupled part of the first-pillar direct payments is useful. It can contribute to encouraging the preservation of certain types of agriculture and/or certain agricultural productions, including the production of suckler cows, in least-advantaged areas and limit land abandonment in corresponding territories (Chatellier and Guyomard, 2008). In the same way, the capping of first-pillar direct aids, the simplified scheme for small farmers, the allocation of aids to the active farmers only and the bonus granted to young farmers are welcome innovations that are however very likely perfectible. For example, it is unfortunate that the capping thresholds are not differentiated according to the MS. In a more general way, as for the greening, it would be advisable to analyse the effectiveness of these four measures with use, over time, according to the targeted objectives, namely better equity in the distribution of first-pillar support and simplification of administrative procedures of granting aids. At the very least, one would recommend allowing the annual revision of definitions, thresholds and criteria in function of results achieved as long as it is not possible to closely link *ex ante* the latter to the measures.

The implementation of a more ambitious policy aiming at favouring the set-up of young farmers is justified all the more since the farmers' population is old (only 14% of EU-27 farmers are under the age of 40 and 6% under 35) and the public expenditure assigned to this objective has decreased over recent years. The first question raised by this specific scheme is that it may induce an increase in the sale price of production factors through the capitalisation of support in the sale price of fixed assets, including farmland. In that case, rather than favouring young farmers by reducing fixed costs when they start farming, part of the support would be captured by their elders. This is true for the specific scheme in favour of young farmers as well as, and perhaps more importantly, for the basic and green payments that would continue to be granted on a per hectare basis: in order to minimise their potential capitalisation in official land prices, it is important that the number of payment entitlements be (substantially) lower than the number of eligible hectares (Courleux et al., 2008); however this condition does not solve the question of an official or unofficial capitalisation in other assets at the moment of the purchase / sale of the farm (Kilian et al., 2012). In addition, despite the voluntarism on display, it is not certain that the young farmers' scheme has a substantial leverage effect on the dynamic of taking up farming which depends on numerous factors: the economic perspectives proposed for the various agricultural sectors and products; the methods used to ensure the transition of capital from one generation to the next; the image of agriculture in the society; the social conditions of the job (working time) and the legitimate request to enjoy similar living conditions in urban and rural areas, notably as regards access to public and private services (education, transport, internet, etc.). More specifically, the European Court of Auditors (ECA) acknowledges that the specific scheme in favour of young farmers "may indeed encourage [them] to start up innovative and dynamic farming business", but also notes that the proposal to require new entrants to base claim to aid on entitlements received in 2011 "is likely to create new barriers to entry for new farmers" (European Court of Auditors, 2012).

³ In France, approximately 2.5% of the first-pillar aids are perceived by farms with more than 200,000 euros of payments. In addition, the capping could lead to artificial splits among the most concerned farms.

3.3. The standardisation of the SFP will be the main vehicle of redistribution within each MS

The new architecture proposed for allocating first-pillar direct aids could lead to significant budgetary redistribution among farms and regions in a country like France where the historical reference model of the SPS is still in force. This would not be the case in countries like Germany or the United Kingdom which already use the model of uniform aids per hectare. To illustrate the redistribution issue in France, we present the results of static simulations using data of the Farm Accountancy Data Network (FADN) for 2010. The impact is measured in euros per farm, in % of total agricultural output (excluding direct subsidies), in % of farm income and in % of total direct subsidies (pillars I and II). Given the huge uncertainties on the way France could implement the EC proposals, four scenarios are considered. In each scenario, all agricultural land becomes eligible for basic and green payments, including land which is not eligible under the current SPS.

The first scenario (SFN) corresponds to full standardisation at the national level. The standardisation of the amount of first-pillar direct aids is thus applied at the country scale on the basis of all first-pillar payments (SFP and coupled

| Table 1. Direct | aids to p | professio | onal Frei | nch farn | is in 201 | 10 accor | ding to j | farm spe | ecialisat | ion. |
|---------------------|--------------------|--------------|-----------|-----------------------|----------------|---------------|------------------|----------------|---------------------------------|----------------|
| Farm specialisation | Number of farms | UAA per | | Pillar I and (€ ar | | 3 | Pillar I s (€ | | Single Farm Payment (SFP, €) | |
| | | farm (ha) | / farm | / AWU | / ha of UAA | / farm income | / farm | / ha of UAA | / farm | / ha of UAA |
| COP | 51 420 | 123 | 39 700 | 28 600 | 323 | 78% | 36 800 | 299 | 35 500 | 289 |
| Other field crops | 19 490 | 121 | 45 100 | 20 000 | 373 | 54% | 41 600 | 344 | 40 100 | 332 |
| Crop and livestock | 39 230 | 112 | 41 700 | 20 500 | 372 | 85% | 36 100 | 322 | 32 100 | 286 |
| Dairying | 48 170 | 86 | 34 200 | 18 700 | 398 | 79% | 26 100 | 304 | 25 700 | 299 |
| Beef cattle | 33 450 | 101 | 42 100 | 30 500 | 415 | 207% | 32 300 | 319 | 20 900 | 206 |
| Mixed livestock | 9 370 | 120 | 48 800 | 25 400 | 407 | 118% | 38 100 | 318 | 33 300 | 278 |
| Sheep and goats | 14 140 | 86 | 38 600 | 25 600 | 452 | 139% | 25 300 | 296 | 17 100 | 200 |
| Other herbivorous | 6 170 | 60 | 22 600 | 9 300 | 379 | 383% | 15 900 | 267 | 11 100 | 186 |
| Pigs | 6 030 | 60 | 22 000 | 10 400 | 365 | 42% | 17 100 | 284 | 16 300 | 271 |
| Poultry | 12 560 | 47 | 17 400 | 10 400 | 372 | 42% | 14 800 | 317 | 13 400 | 287 |
| Orchards and fruits | 7 950 | 32 | 15 800 | 3 400 | 499 | 55% | 4 500 | 142 | 4 000 | 126 |
| Horticulture | 6 720 | 6 | 3 300 | 900 | 564 | 10% | 500 | 86 | 500 | 86 |
| Vegetable | 4 440 | 15 | 9 600 | 2 000 | 663 | 15% | 2 400 | 166 | 2 200 | 152 |
| Wine | 46 940 | 22 | 4 300 | 1 600 | 191 | 8% | 2 000 | 90 | 1 900 | 85 |
| Total | 312 180 | 84 | 31 100 | 15 100 | 371 | 69% | 25 200 | 301 | 22 300 | 266 |

SSP - FADN France 2010 / INRA SAE2 Nantes.

European and national funds. AWU: Agricultural Work Unit; UAA: Agricultural Utilised Area; COP: Cereals, Oleaginous and Proteagenous.

| French regions | Number | UAA | Pill | ar I and II d | | lies | Pillar I s | | Single Farm | |
|---------------------|----------|------|--------|---------------|---------|--------|------------|---------|-----------------|---------|
| (all types of farm) | of farms | per | | (€ an | d %) | | (6 | E) | Payment (SFP, € | |
| | | farm | / farm | / AWU | / ha of | / farm | / farm | / ha of | / farm | / ha of |
| | | (ha) | | | UAA | income | | UAA | | UAA |
| Alsace | 6 750 | 43 | 17 400 | 8 000 | 408 | 40% | 15 000 | 352 | 14 800 | 347 |
| Aquitaine | 24 500 | 48 | 19 900 | 8 400 | 415 | 81% | 14 900 | 310 | 12 300 | 256 |
| Auvergne | 14 450 | 93 | 40 400 | 26 800 | 436 | 130% | 26 900 | 290 | 21 100 | 228 |
| B-Normandie | 12 900 | 95 | 34 300 | 16 200 | 362 | 105% | 29 300 | 309 | 26 900 | 284 |
| Bourgogne | 15 090 | 115 | 38 700 | 18 700 | 337 | 89% | 32 600 | 284 | 26 800 | 233 |
| Bretagne | 25 910 | 61 | 25 000 | 12 000 | 411 | 47% | 21 100 | 346 | 20 300 | 333 |
| Centre | 18 440 | 127 | 40 400 | 21 300 | 317 | 64% | 36 600 | 287 | 34 200 | 268 |
| Ch. Ardenne | 19 220 | 88 | 31 000 | 14 200 | 353 | 32% | 28 200 | 321 | 27 400 | 312 |
| Corse | 1 540 | | | | | | | | | |
| Franche-Comté | 6 270 | 111 | 37 300 | 21 800 | 336 | 75% | 25 200 | 227 | 23 800 | 214 |
| Haute-Normandie | 6 980 | 112 | 40 000 | 21 700 | 358 | 84% | 37 700 | 337 | 35 200 | 315 |
| Ile-de-France | 4 300 | 130 | 46 600 | 22 800 | 359 | 61% | 42 700 | 329 | 41 100 | 317 |
| LRoussillon | 16 390 | 44 | 13 900 | 6 200 | 314 | 64% | 6 600 | 149 | 5 300 | 120 |
| Limousin | 7 930 | 93 | 38 400 | 23 600 | 411 | 181% | 28 800 | 308 | 18 900 | 202 |
| Lorraine | 7 890 | 157 | 52 800 | 27 200 | 337 | 91% | 45 900 | 293 | 41 800 | 266 |
| Midi-Pyrénées | 26 330 | 78 | 31 500 | 18 000 | 402 | 111% | 23 900 | 305 | 19 100 | 244 |
| Nord-P-Calais | 10 530 | 80 | 31 800 | 16 600 | 398 | 54% | 28 900 | 362 | 27 500 | 344 |
| Pays-de-la-Loire | 25 310 | 82 | 31 500 | 14 000 | 382 | 77% | 27 500 | 334 | 23 600 | 286 |
| Picardie | 10 860 | 131 | 50 600 | 27 200 | 385 | 65% | 47 600 | 363 | 45 300 | 345 |
| Poitou-Charentes | 17 580 | 97 | 34 300 | 18 100 | 353 | 63% | 28 900 | 297 | 25 200 | 259 |
| PACA | 11 730 | 37 | 15 100 | 5 100 | 407 | 50% | 8 1 0 0 | 218 | 6 400 | 173 |
| Rhône-Alpes | 21 290 | 63 | 24 200 | 11 100 | 384 | 69% | 14 800 | 235 | 13 400 | 213 |
| France | 312 180 | 84 | 31 100 | 15 100 | 371 | 69% | 25 200 | 301 | 22 300 | 266 |

SSP - FADN France 2010 / INRA SAE2 Nantes.

European and national funds. Empty cells are not statistically significant. AWU: Agricultural Work Unit; UAA: Agricultural Utilised Area; COP: Cereals, Oleaginous and Proteagenous.

direct aids). Each professional farm receives a same amount of 301 euros of decoupled direct aids per hectare (Table 1).

The second scenario (SPN) corresponds to partial standardisation at the national level. Current coupled aids, in particular the suckler cow premium, are maintained and are not subject to redistribution. The standardisation is thus applied at the country scale on the basis of the SFP only. Each professional farm receives then an identical amount of 266 euros of decoupled direct aids per hectare (Table 1).

The third scenario (SFR) is the regional counterpart of SFN. It corresponds to full standardisation applied at the level of French administrative regions. It is implemented by dividing the national ceiling of first-pillar direct payments by the number of eligible regional hectares. Decoupled direct aids per hectare are identical in each region, for example 352 euros in Alsace, but differ among regions, for example 363 euros in Picardie but only 149 euros in Languedoc-Roussillon (Table 2).

Finally the fourth scenario (SPR) is the regional counterpart of SPN. All farms in Picardie now receive an identical amount of 345 euros of decoupled direct aids per hectare and all farms in Languedoc-Roussillon an identical amount of 120 euros (Table 2).

Simulation results are presented in Tables 3, 4, 5 and 6. They can be summarised as follows.

When the standardisation is full and applied at the national level (SFN), the great winners are the farms specialised in productions corresponding to noneligible hectares under the SPS (Table 3). This is the case for the farms speciaTable 3. Impact of full (SFN) versus partial (SPN) national standardisation on French farms: analysis for the different specialisations.

| Farm specialisation | | SF | 'n | | | SF | 'N | |
|---------------------|---------------|-------------------|-----------------|-------------------------|---------------|-------------------|-----------------|----------------------|
| | € per farm | % of total output | % of the income | % of total subsidies | € per farm | % of total output | % of the income | % of total subsidies |
| COP | 200 | 0% | 0% | 1% | -2 800 | -2% | -5% | -7% |
| Other field crops | -5 300 | -2% | -6% | -12% | -7 950 | -3% | -10% | -18% |
| Crop and livestock | -2 400 | -1% | -5% | -6% | -2 270 | -1% | -5% | -5% |
| Dairying | -300 | 0% | -1% | -1% | -2 840 | -2% | -7% | -8% |
| Beef cattle | -1 800 | -3% | -9% | -4% | 6 080 | 9% | 30% | 14% |
| Mixed livestock | -2 000 | -1% | -5% | -4% | -1 370 | -1% | -3% | -3% |
| Sheep and goats | 400 | 1% | 1% | 1% | 5 650 | 8% | 20% | 15% |
| Other herbivorous | 2 000 | 1% | 34% | 9% | 4 760 | 4% | 81% | 21% |
| Pigs | 1 000 | 0% | 2% | 5% | -280 | 0% | -1% | -1% |
| Poultry | -800 | 0% | -2% | -5% | -970 | 0% | -2% | -6% |
| Orchards and fruits | 5 000 | 3% | 17% | 32% | 4 440 | 2% | 15% | 28% |
| Horticulture | 1 200 | 1% | 4% | 36% | 1 040 | 0% | 3% | 32% |
| Vegetable | 2 000 | 1% | 3% | 21% | 1 660 | 1% | 3% | 17% |
| Wine | 4 700 | 2% | 9% | 109% | 4 030 | 2% | 8% | 94% |
| Total | 0 | 0% | 0% | 0% | 0 | 0% | 0% | 0% |

SSP - FADN France 2010 / INRA SAE2 Nantes.

SFN: redistribution at the national scale on the basis of all pillar I subsidies. SPN: redistribution at the national scale on the basis of the SFP.

| Table 4. Impact of full (SFN) versus partial (SPN) national standardisation on Free | nch farms: |
|---|------------|
| analysis for the administrative regions. | |

| French regions | | SF | -N | | | SF | 'n | |
|---------------------|----------|------------|--------|------------|----------|------------|--------|------------|
| (all types of farm) | € | % of total | % of | % of total | e | % of total | % of | % of total |
| | per farm | output | income | subsidies | per farm | output | income | subsidies |
| Alsace | -2 200 | -1,4% | -5% | -13% | -3 460 | -2,2% | -8% | -20% |
| Aquitaine | -500 | -0,3% | -2% | -3% | 470 | 0,3% | 2% | 2% |
| Auvergne | 900 | 1,0% | 3% | 2% | 3 540 | 3,8% | 11% | 9% |
| Basse-Normandie | -800 | -0,4% | -2% | -2% | -1 700 | -0,9% | -5% | -5% |
| Bourgogne | 1 900 | 1,2% | 4% | 5% | 3 750 | 2,3% | 9% | 10% |
| Bretagne | -2 800 | -1,1% | -5% | -11% | -4 090 | -1,7% | -8% | -16% |
| Centre | 1 700 | 0,9% | 3% | 4% | -270 | -0,1% | 0% | -1% |
| ChArdenne | -1 800 | -0,7% | -2% | -6% | -4 010 | -1,5% | -4% | -13% |
| Franche-Comté | 8 200 | 5,3% | 17% | 22% | 5 760 | 3,8% | 11% | 15% |
| Haute-Normandie | -4 100 | -2,0% | -9% | -10% | -5 450 | -2,7% | -11% | -14% |
| Ile-de-France | -3 700 | -1,6% | -5% | -8% | -6 560 | -2,8% | -8% | -14% |
| LRoussillon | 6 700 | 6,0% | 31% | 48% | 6 490 | 5,8% | 29% | 47% |
| Limousin | -700 | -0,9% | -3% | -2% | 5 980 | 7,7% | 28% | 16% |
| Lorraine | 1 300 | 0,7% | 2% | 2% | -50 | 0,0% | 0% | 0% |
| Midi-Pyrénées | -300 | -0,3% | -1% | -1% | 1 760 | 1,7% | 6% | 6% |
| Nord-P-de-Calais | -4 900 | -2,3% | -8% | -15% | -6 240 | -2,9% | -10% | -20% |
| Pays-de-la-Loire | -2 700 | -1,3% | -7% | -9% | -1 670 | -0,8% | -4% | -5% |
| Picardie | -8 100 | -3,3% | -10% | -16% | -10 360 | -4,2% | -13% | -20% |
| Poitou-Charentes | 300 | 0,2% | 1% | 1% | 670 | 0,4% | 1% | 2% |
| PACA | 3 100 | 2,1% | 10% | 21% | 3 470 | 2,4% | 11% | 23% |
| Rhône-Alpes | 4 100 | 3,2% | 12% | 17% | 3 360 | 2,6% | 9% | 14% |
| France | 0 | 0.0% | 0% | 0% | 0 | 0.0% | 0.0% | 09 |

SSP - FADN France 2010 / INRA SAE2 Nantes.

SFN: redistribution at the national scale on the basis of all pillar I subsidies. SPN: redistribution at the national scale on the basis of the SFP.

lised in wine (the amount of decoupled direct aids they receive would increase by 4,700 \in) and for those specialised in orchards (the amount of decoupled direct aids they receive would increase by 5,000 \in). Beef cattle farms would be penalised (-1,800 \in) although their 2010 income is low relative to the other types of farms: this explains by the fact that the amount of pillar I direct aids per hectare they receive today is higher than the national average (319 \in versus 301 \in) and the suckler cow premium is decoupled. The impact of this scenario is negligible on average for both COP $(+200 \in)$ and dairy $(-300 \in)$ farms. However these national figures mask huge disparities from one region to another, mainly in function of production intensification levels. For example, this scenario would favour extensive dairy farms in Franche-Comté (+10.800 € of decoupled direct payments) and Auvergne (+5,000 \in) but it would penalise more intensive dairy holdings in regions like Picardie (-9,600 €) or Bretagne (-4,800 €). In a general way, applying the full standardisation at the national level would be particularly beneficial for Franche-Comté, the two Mediterranean regions (Languedoc-Roussillon and PACA) and Rhône-Alpes.

Applying the national standardisation for the SFP only (SPN) versus all direct subsidies of pillar I (SFN) would mainly impact the beef cattle farms: their 2010 income would decrease by 9% in SFN; it would increase by 30% in SPN. In the partial standardisation scenario, the beef cattle holdings retain the benefit of the suckler cow premium which remains coupled and simultaneously benefit from the national redistribution of the SFP because the latter is lower than the national average (respectively, 206 € and 266 €). COP and dairy farms are more disadvantaged in the partial versus full standardisation scenario, in both cases with huge disparities among regions; wine and horticulture holdings are less advantaged (Table 3). In a region like Limousin, highly specialised in beef cattle production, maintaining coupled the suckler cow premium would allow farmers of this region to win about 6,000 € (+28% of agricultural regional income) to compare with a loss of about 700 € for a full standardisation at the national level (-3% of agricultural regional income). In a more general way, the partial standardisation

applied at the country level would allow to reinforce the redistribution of funds induced by the French application of the 2008 CAP Health Check (Chatellier and Guyomard, 2011): the beef cattle farms in extensive regions would gain and the more intensive holdings (dairy farms with fodder maize and young beef animals in the western part of the country, COP farms with grain maize and irrigation in the South-West, etc.) would be penalised (Table 4).

In both SFR and SPR, the standardisation is implemented at the regional level without redistribution of funds between

| Table 5. Impact on French farms of a full flat-rate model applied at the level of administrative re- |
|--|
| gions (SFR, no coupling): analysis for some types of farms. |

| Farm types | CC | OP | Crop and | livestock | Dair | Dairying | | Beef cattle | | nd goats |
|------------------|--------|--------|----------|-----------|--------|----------|--------|-------------|---------|----------|
| | € per | % | € per | % | € per | % | € per | % | € per | % |
| Regions | farm | income | farm | income | farm | income | farm | income | farm | income |
| Alsace | 100 | 0% | -3 500 | -7% | 200 | 0% | | | | |
| Aquitaine | -900 | -3% | -1 900 | -8% | -3 000 | -18% | -6 000 | -50% | -4 700 | -24% |
| Auvergne | -1 000 | -2% | 100 | 0% | 4 300 | 14% | -3 000 | -13% | -6 100 | -23% |
| Basse-Normandie | | | -1 000 | -2% | -1 000 | -3% | -1 900 | -20% | | |
| Bourgogne | 2 000 | 3% | -1 500 | -4% | -2 400 | -5% | -3 100 | -14% | | |
| Bretagne | | | -900 | -1% | -1 400 | -3% | | | | |
| Centre | 900 | 1% | -2 700 | -5% | -5 100 | -10% | -900 | -3% | | |
| ChArdenne | 700 | 1% | 8 100 | 9% | 1 700 | 3% | | | | |
| Franche-Comté | | | -10 100 | -15% | 3 400 | 7% | | | | |
| Hte-Normandie | 2 100 | 5% | -1 000 | -2% | -2 400 | -6% | | | | |
| Ile-de-France | 1 400 | 2% | | | | | | | | |
| LRoussillon | | | | | | | -7 700 | -32% | -800 | -3% |
| Limousin | | | | | | | 400 | 2% | -5 500 | -24% |
| Lorraine | 3 000 | 5% | -2 400 | -4% | 1 300 | 2% | | | | |
| Midi-Pyrénées | -700 | -2% | -2 500 | -8% | -200 | -1% | -2 600 | -15% | 3 900 | 14% |
| Nord-P-Calais | 300 | 1% | -2 400 | -3% | -3 600 | -7% | | | | |
| Pays-de-la-Loire | 5 300 | 14% | -1 100 | -2% | 0 | 0% | -3 200 | -16% | | |
| Picardie | 1 900 | 4% | -4 100 | -5% | -3 500 | -7% | | | | |
| P-Charentes | 3 100 | 7% | -1 800 | -3% | -4 700 | -13% | -4 900 | -19% | -10 700 | -26% |
| PACA | | | | | | | | | -11 500 | -38% |
| Rhône-Alpes | -5 800 | -18% | -2 200 | -5% | 400 | 1% | -2 200 | -10% | | |

Empty cells are not statistically significant.

| Farm types | CC | OP | Crop and livestock | | Dairying | | Beef cattle | | Sheep and goats | |
|------------------|--------|--------|--------------------|--------|----------|--------|-------------|--------|-----------------|--------|
| | € per | % | € per | % | € per | % | € per | % | € per | % |
| Regions | farm | income | farm | income | farm | income | farm | income | farm | income |
| Alsace | -200 | -1% | -2 900 | -6% | 100 | 0% | | | | |
| Aquitaine | -4 400 | -14% | -1 400 | -6% | -6 100 | -36% | 1 400 | 12% | 100 | 1% |
| Auvergne | -6 700 | -17% | -1 100 | -3% | 300 | 1% | 1 800 | 8% | -4 800 | -18% |
| Basse-Normandie | | | -300 | -1% | -3 100 | -8% | 7 000 | 73% | | |
| Bourgogne | -5 100 | -8% | -2 300 | -6% | -8 100 | -17% | 3 800 | 17% | | |
| Bretagne | | | -400 | -1% | -1 900 | -4% | | | | |
| Centre | -800 | -1% | 300 | 1% | -6 700 | -13% | 10 900 | 42% | | |
| ChArdenne | 600 | 1% | 8 300 | 10% | 1 600 | 3% | | | | |
| Corse | | | | | | | -1 800 | -7% | -800 | -3% |
| Franche-Comté | | | -9 300 | -14% | 2 400 | 5% | | | | |
| Haute-Normandie | 1 200 | 3% | 300 | 1% | -4 300 | -11% | | | | |
| Ile-de-France | 1 100 | 2% | | | | | | | | |
| LRoussillon | | | | | | | -2 000 | -8% | 2 600 | 9% |
| Limousin | | | | | | | 800 | 4% | -3 100 | -14% |
| Lorraine | 2 200 | 3% | -2 000 | -3% | -1 500 | -3% | | | | |
| Midi-Pyrénées | -5 300 | -15% | -1 600 | -5% | -3 900 | -13% | 3 100 | 18% | 6 200 | 23% |
| Nord-P-Calais | 100 | 0% | -1 900 | -3% | -4 200 | -8% | | | | |
| Pays-de-la-Loire | 1 700 | 4% | -2 600 | -5% | -3 900 | -8% | 3 900 | 19% | | |
| Picardie | 1 600 | 3% | -4 000 | -5% | -4 400 | -9% | | | | |
| P-Charentes | -700 | -2% | -1 700 | -3% | -7 200 | -20% | 3 800 | 14% | -1 300 | -3% |
| PACA | | | | | | | | | -4 200 | -14% |
| Rhône-Alpes | -7 200 | -22% | -2 600 | -6% | -1 300 | -3% | 4 800 | 23% | | |

SSP - FADN France 2010 / INRA SAE2 Nantes.

Empty cells are not statistically significant.

the regions. The full regional standardisation (SFR) would have a negative impact of beef cattle holdings in all the administrative regions, except in Limousin where they would gain (+400 \in) essentially at the expense of farms specialised in sheep and goats which would lose around 5,500 \in (Table 5). In regions where COP farms are numerous (Ile de France, Centre and Picardie), the redistribution is small because the current dispersion of first-pillar direct aids is narrow. In the region Pays de la Loire, COP farms would gain (+14% of their 2010 income), mainly at the expense of intensive beef cattle farms (-16% of their 2010 income); the average impact on specialised dairy farms would be null. The situation is inverted in the region Rhône-Alpes where COP farms would be penalised (-5,800 \in), because the region includes a large number

of extensive dairy farms (+400 \in). In Franche-Comté and Auvergne, dairy farms remain favoured but less relative to both SFN and SPN.

SPR which maintains coupled the suckler cow premium would allow beef cattle farms to win in all the administrative regions, except Corse. In practice, both SPR and SPN show the crucial importance of maintaining coupled the suckler cow premium for beef cattle holdings. In SPR, these production units would gain to the detriment of specialised COP and dairy farms which would lose or gain less (with regard to SFR). Dairy farms located in regions of mixed farming like Bourgogne or Poitou-Charentes would be heavily penalised (cut in 2010 income of 20% in Poitou-Charentes and 17% in Bourgogne) because the SFP they receive today is larger than that of COP farms (Table 6).

In summary, these four simulations show that the redistribution of funds between French farms could be very substantial and very different depending on the way the standardisation is implemented: national versus regional scale, full versus partial standardisation, regional envelopes defined by simple division on the basis of eligible hectares or on the basis of various "objective" criteria such as income, output and/or labour, etc. This means that the proposals give each MS an important margin of manoeuvre for reorienting first-pillar direct aids. This also illustrates a point already mentioned, namely the insufficient justification and targeting of the first pillar, more specifically of the basic payment.

Conclusion

With the October 2011 legislative proposals for CAP reform, the EC played first. It may then be considered rational for the other stakeholders to play "opposite" cards so as to set the limits of the intervals in which the difficult game of negotiations will take place, a game which will enable, at least theoretically, these proposals to become legal decisions. But above all, does it exist any other possible way than that taken by the EC which, within the framework of a budget under tension, must try to reconcile ambitions and objectives, irreconcilable *a priori*, or at least barely compatible: the competitiveness of European agriculture and the protection of the environment; the same competitiveness and the protection of small farmers in a more than difficult economic context which makes the opportunities of non-farming jobs more than scarce; the convergence of direct aids for equity motives without putting into danger a too large number of farms which cannot survive without these aids; the convergence of aids because of the reduction in the inequalities between countries and regions while taking into account local particularities, notably geographical handicaps; the request of the UE-12 MS for an increase in the aids granted to them because of an equal treatment for all the European countries without irritating the former MS of the EU-15 which have their eves riveted on their budgetary return, etc.

No one can be expected to do the impossible. As a result, we think that the path taken by the EC is the right one. The preamble of the reform is shared: the European agriculture must be sustainable from an economic, social and environmental point of view, and the CAP has to serve this legitimate and necessary ambition. By political realism, more specifically acceptability by the various protagonists and first of all the governments of the 27 EU countries, such or such actor could estimate that such or such orientation is too timid or, on the contrary, too sudden. But above all, the immediate and direct consequence of this political pragmatism which has led to a successive-step policy since 1992 is that, very likely, it is not the ultimate reform of the CAP; that of 2014 will doubtless be very quickly followed by other reforms.

As a result, a logic recommendation is to focus attention on the drawbacks of the EC proposals that can "easily" be amended so that their effectiveness would be enhanced. In addition, it is crucial that the modified proposals could be built on in further reforms: changes should not lead the EC to maintain the status-quo - unfortunately a likely evolution as shown by the current discussions between the EC, the European Parliament and the different national governments (on this point, see the most recent issues of Agra Europe) - or to follow an impasse in a long-term dynamic perspective. The ECA (2012) considers that these proposals are much more oriented towards compliance than effectiveness, remaining fundamentally focused on spending and controlling expenditure. This is at least partly true. Although simplicity is of course a legitimate objective, we do believe that a modernised CAP targeted on market failures as well as environmental and territorial public goods will entail rather significant transaction costs as the policy should in most cases operate on a spatial basis rather than at the scale of the farm.

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