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European farmers and the "Greening" of the CAP: A Critical Discourse Analysis

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European farmers and the "Greening" of the CAP: A Critical Discourse Analysis[1]

Alberto Serra and Jessica Duncan

Abstract

Agricultural producers are facing unprecedented challenges. Across the European Union, the number of farmers has been declining in the face of a growing number of threats, including price volatility, high market competition, difficulties related to intergenerational farm succession, and increasing climatic variability. Many actors, including the European Commission, are developing policies that seek to address the increasingly complex agricultural situation. Notably, the revised Common Agricultural Policy (CAP) (2015) aims to enhance competiveness while also improving sustainability and effectiveness of the European agricultural sector. Of interest in this paper is how the CAP regulation around the direct payment scheme on 'agricultural practices beneficial for the environment and the climate' intends to advance the goal of "greening" European farms. In order to understand the potential of the CAP to address current challenges facing European farmers, and family farmers in particular, this paper presents a Critical Discourse Analysis. We assesses the intersections across different layers of meanings to advance understanding of the payment scheme and to map out potential implications for the farming practices of small-scale family farmers. The paper concludes by arguing that the payment scheme is likely to only minimally contribute to the advancement of its objectives, if at all.

Keywords: farmers, agricultural practices, Common Agricultural Policy, Critical Discourse Analysis.

[1] Based on research undertaken for a BSc thesis in Rural Sociology (Wageningen University).

Introduction

The world population increases, world food production increases, but the number of farmers declines. While the total area used for agriculture has remained almost stable from 2003-2013 (Eurostat 2015b), agricultural production has increased (United Nation 2014). At the same time the number of holdings in the EU decreased by more than 4 million (Eurostat 2015b). The decline is not surprising given that farmers are facing many challenges and threats including market price fluctuations, market competition, access to capital and technology and high difficulties in the intergenerational succession of farming activities (Davidova and Thomson 2014).

Data from the UN's Food and Agriculture Organization (FAO) shows that one per cent of farmers control 65% of all agricultural land (FAO 2014a). In Europe 85% of farms are family farms that play an important role contributing to food security, providing high quality diverse produce, enhancing the vitality of rural economy and having strong interest in environmental care hence with limited access to farming resources (Davidova and Thomson 2014).In contrast, large scale farmers are able to cope better with such stresses, nevertheless contributing to reduce the competiveness among farmers, due to their production capacity and better access to capital (Evans 2014). Technological and policy choices by large producers and landholders fuelled the growth of inequality in rural areas contributing to squeezing out small farms (van der Ploeg 2006; De Schutter 2014). Although many small-scale farmers keep on struggling to survive, Europe became in last decades one of the leading power in agricultural trade (Fritz 2011).

The expansion of farm-size and the associated intensification of agriculture has also been shown to have negative environmental consequences. The diffusion of agricultural monoculture has been associated with the burgeoning use of pesticides and fertilizers and damages to ecosystem while contributing to the decline of biodiversity (Carvalho 2006; Donald et al. 2006; Geiger et al. 2010; Stoate et al. 2001). We recognise that agricultural intensification occurs across different scales, and includes "increased application of herbicides, insecticides, fungicides and chemical fertilizer on local fields to loss of natural and semi-natural habitats and decreased habitat heterogeneity at the farm and landscape levels" (Geiger et al. 2010: 98; see also Attwood et al. 2008; Bengtsson, Ahnström, and Weibull 2005; Benton, Vickery, and Wilson 2003; Billeter et al. 2007; Hendrickx et al. 2007; Kruess et al. 2005). So far it has been difficult to disentangle the impacts of intensified management of local fields from changes in land use at the landscape level, since both occur simultaneously in most agricultural landscapes (Robinson and Sutherland 2002).

The decline of biodiversity, environmental degradation, the decreasing number of farmers, put the state of agriculture at risk, at the same time, agriculture is contributing to these problems. Worldwide, agriculture is the leading driver of deforestation and forest degradation globally, a process that accounts for a 17% of global carbon emissions. An additional 19–29% of global greenhouse gas emissions are directly attributed to agriculture (Norris 2008; Vermeulen, Campbell, and Ingram 2012).

For this reason it is important to understand how relationships between environmental sustainability and agriculture are being addressed in the European Common Agriculture Policy (CAP). The original objectives of the CAP, as set out in the founding Treaty of Rome (1957), were to address the development of the European farming sector. The CAP was launched in 1962 with the aim of increasing agricultural productivity by promoting technical progress, ensuring fair living for farmers, stabilizing markets and ensuring food availability (EEC 1957). Since then, the CAP has undergone multiple reforms which have led to shifts in objectives through the years. Today, the CAP remains subject to active criticism for promoting uneven production by favouring agribusiness in setting up supply chains, controlling prices, and buying market surpluses(Fritz 2011) and that is associated with environmental damages through agricultural intensification (Stoate et al. 2001).

In the context of the decline of small-scale family-farms across Europe, coupled with the need for more ecological modes of production, this paper presents a Critical Discourse Analysis (CDA) of the European regulation establishing rules for direct payments to farmers who undertake "greening

practices" as defined in the latest CAP 2014-2020 payment scheme about 'agricultural practices beneficial for the environment and the climate' also known as "Greening". While we acknowledge that CDA has been critiqued for remaining limited to the sphere of the language (Haig 2004), we argue that it useful here insofar as it provides tools to unveil institutional biases. We start by presenting an overview of the Common Agriculture Policy before considering key threats facing European farmers. We then apply CDA to analyse the European regulation in question. We conclude by discussing the main findings in relation to existing knowledge about these agricultural practices.

1 The CAP and European farmers

1.1 Development of the CAP

The European Union's Common Agriculture Policy (CAP) was developed in 1960 in line with broader aims to unify the European market. Specifically it aims to foster the free trade of agricultural products, organise markets, establish an European agricultural fund, and facilitate financial solidarity (European Commission 2015). Since its launch, the CAP has undergone many reforms. The reforms and instruments adopted in the decades after its creation represented important benchmarks in the development of European agriculture. Among these, and perhaps one of the most influential was the Mansholt Plan (1972) that encouraged five million farmers to give up farming in order to redistribute their land and increase the size of farms (European Commission 2015).

Reforms undertaken in 1999 and 2003 saw the introduction of new objectives that sought to promote a more market oriented and competitive agricultural sector, including food safety and quality measures, the integration of environmental concerns and the development of rural areas (European Commission 2015).

These reforms introduced new measures such as 'cross compliance' that linked the CAP support with environmental measure; 'modulation' to reduce payments in order to shift funds to Rural Development; 'decoupling' to break the link between the payment and production; and the Single Payment Scheme that stands for a decouple payment from production which have been transformed in the Basic Payment scheme in 2013.

In 2008 with the Health Check reform there was a breakthrough in climate change policy encouraging farmers to decrease their contribution to carbon emission and to adjust farms to climate change's effects.

Among all instruments provided by the CAP, direct payments have been widely questioned. Created in the 1990s direct payments became one of the main CAP instruments. Intended to compensate low farm prices, with the MacSharry reform[2], direct payments were coupled to production where farmers had to comply with land and livestock restrictions.

However, in November 2010 a new process was launched for the reform of the CAP. This process was characterized by having the European Commission acting as co-legislator with the council (European Commission 2013c). The European Commission collected the opinion of general public and asked certain stakeholders, think thank and research institutes to submit detailed papers on why we need a European common agricultural policy, what citizens expect from agriculture, why reform the CAP and what tools we need for the CAP of tomorrow (European Commission 2013a). Results were collected from an independent body constituted by a panel of experts and then summarized noticing many divergences among the contributions (European Commission 2013a). After undertaking an impact assessment and different scenarios the Commission set a proposal for the designation of the CAP (European Commission 2011b, 2011c). This process might represent a participatory approach to the designation of the CAP, however in such process hardly all recommendations can be conciliated in the policy.

[2] The MacSharry reforms (1992) sought to limit rising production across the EU while (rather paradoxically) seeking to adjust to the broader push for more free-markets in agriculture.

On January 1st 2015 the new CAP entered in force. The current CAP is divided into two pillars. Pillar I contains intervention in farm commodity market by regulation and price support but also support for farm incomes via direct payments schemes. Pillar II contain support programme for Rural Development which focus on improving the competitiveness of farming and forestry, protecting the rural environment, diversifying the rural economy and promoting quality of life for rural inhabitants (Hennessy 2014). Currently within direct payments (Pillar 1) there are three compulsory schemes: basic payment; green payment; and, young farmer scheme. There are also three voluntary schemes: redistributive payment; support in areas with natural constraints and coupled support; and a simplified scheme for small farmers (see figure 1).

If the previous editions of the CAP fuelled overproduction, uneven distribute subsides (Fritz 2011) the new CAP claims to provide a better structure that also addresses the gap between large and small-scale farmers (European Commission 2011a). Although the new CAP presents a new promising structure, emerging analyses question its effectiveness (Erjavec and Erjavec 2015; European Commission 2011a; Fritz 2011; Heinrich 2012; PBL Netherlands Environmental Assessment Agency 2012). Having described the main events that characterize that development of the CAP, below we present the main challenges faced by European farmers.

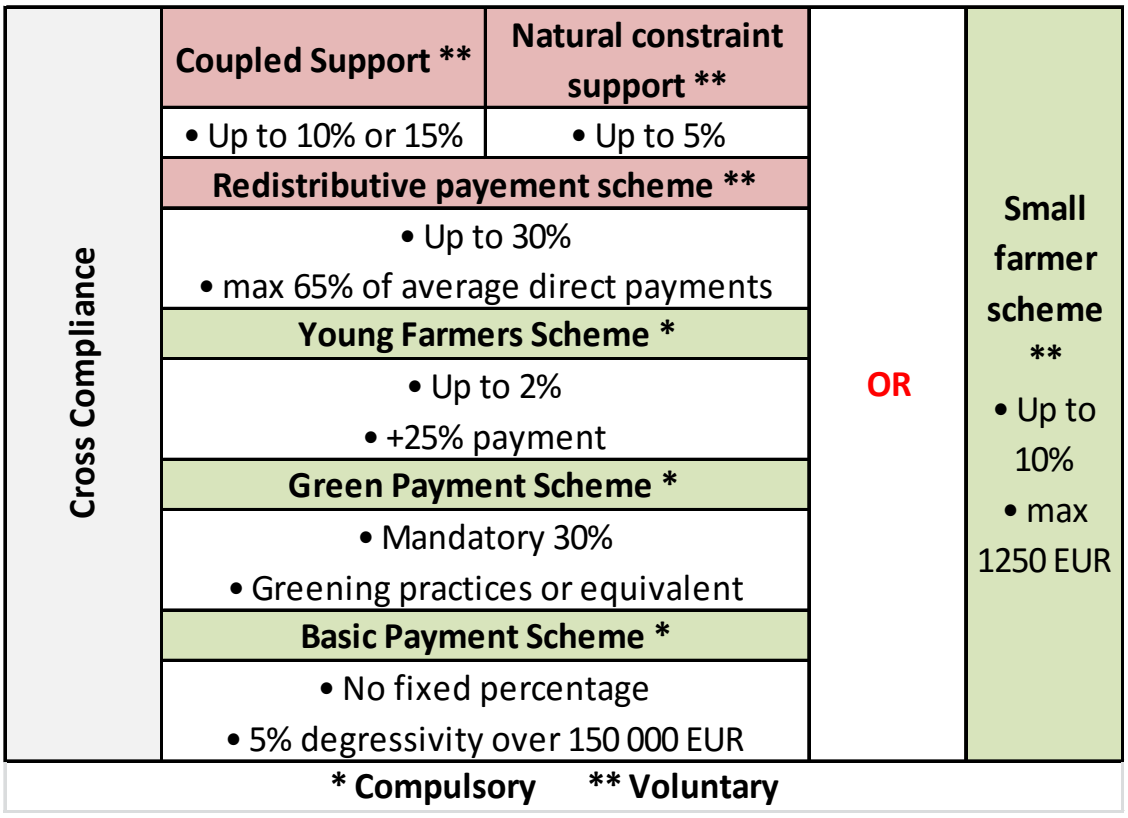

Figure 1 Design of Direct payments (European Commission 2013c)

1.2 Challenges

The situation of European farmers in the last decade can be represented by a series of vulnerabilities and challenges. Farmers are exposed to many threats such as: competitiveness, volatile global market prices, intergenerational succession, and increasing number of workers leaving the agricultural sector (Rabinowicz 2014). However farmers do not represent a homogenous category, nor are their experiences easily generalizable; farms differ by the size and type of land, practices, values, output, and number of farmers/workers operating on a single farm, and the capacity to respond to stresses. The difference among farms in Europe is also marked by the type of agriculture performed such as intensive, multifunctional, organic, among others, which all have different impacts on the farming

practices and environment. In this paper, we are interested in the potential impact of EU agricultural policies on small-scale family farmers.

A family farm is defined as "an agricultural holding which is managed and operated by a household and where farm labour is largely supplied by that household"(Eurostat 2015a). According to Eurostat (2015a), family farms are the most common farming model in the EU: of the 12.2 million farms in the EU-28 in 2010, 96.9 per cent are classified as family farms. One conceptual limitation is that while the term 'family farm' suggests that the at least 50% of the labour to run the farm is from the family, this term fails to provide insight into farming styles or the amount of land being farmed. Within family farms, especially small-scale farmers play a key role in agriculture in contributing to food security and environmental conservation (Davidova and Thomson 2014; Maass Wolfenson 2013) but due to their limited resources in turn suffer more from the challenges above mentioned. Small-scale farmers are in fact understood as farmers whose holding is small than 20 hectares with limited resources. That aside, it is clear that small-scale family-farms are at the core of EU agricultural production. What is less clear is how EU agricultural policy supports them.

Before answering this question, we first present a broad summary of key challenges faced by family farmers in Europe.

A first challenge is the access to resources to remain competitive. Farmers nowadays in fact have to face competitive markets (Mcmichael 2013) characterized for example by access to technology, credit and land. Failure to remain "competitive" leads many farmers to consider land abandonment (Strijker 2005). Access to technology can be considered an important asset (Scoones 1998) for farmers to participate in trade and which can additionally contribute to optimize resources use and cope with lack of labour. However alternative modes of farming to conventional practices, such as agroecology, that do not always require high-cost investment in technologies can still reach adequate results in terms of food security (De Schutter 2010). This is key as research suggests family farmers have restricted access to credit due to expensive loan rates and uncertain risky investments (Davidova and Thomson 2014).

A second challenge related to price volatility. The financial viability of farming is continuously exposed to risks such as the fluctuating balance of input and output prices. Price fluctuation is a threat for farmers who struggle to cope with such uncertainty and has led some to consider abandoning farming in favour of less risky occupations or continuing the farming activity without financial gains (Strijker 2005).

A third challenge is the threat of intergenerational succession is characterized by the probability of family succession, the possibility of having a potential successor and the timing of succession (Glauben et al. 2002). The increasing length of education, long distance from secondary schools and university hinder the intergenerational succession and open up new career path for young people diverse from farming (Davidova and Thomson 2014; DLG 2005) while many young people strive to get access to agricultural land (FAO 2014a).

The above mentioned threats are rooted in a larger process that saw the increase of food production, population growth and changing practices associated with food provisioning. In order to supply adequate amounts of food in the last decades the productive sector had to adjust its capacity. Many farms became more specialized. Through specific programmes and policies it has been possible for some farmers to scale up their production. Due to fast capacity of enlargement, larger-scale farmers have been able to expand their land holdings and increase agricultural production (Evans 2014; van der Ploeg 2006), supplying the market with goods at prices lower than the costs of production. This has been shown to have negative impacts on small-scale farmers who struggle to bring the price of their products any lower (Koning 2007). Besides, notably small-scale farmers in Europe as elsewhere, are threatened by regulations and policies, and especially international policies generally designed for industrial agriculture and which make it very difficult to continue to produce (FAO 2014b).

Having that said, the new 'Greening' scheme of the new CAP, might represent an inclusive measure for small-scale family farmers that provides three measures assumed beneficial for the climate and the environment. Because such claim and its potential we hereby present a discursive analysis of the new 'Greening' payment of the CAP in order to understand its potential discursive implications over European farmers and farming practices.

2 Critical Discourse Analysis

To better understand the potential implications of the CAP for small-scale family farmers, we have undertaken a critical discourse analysis (CDA) of a specific payment scheme: agricultural practices beneficial for the climate and the environment. Such an approach builds on the work of other authors who have similarly applied discourse analysis to the CAP (see for example, Erjavec, Erjavec, and Juvančič 2009; Erjavec and Erjavec 2009, 2015; Potter and Tilzey 2005). CDA is an approach for discourse analytic research that allows for a critical analysis of texts. It is important to look at the text of the regulation as it constitutes ideologies and discursive subjects. The production of a regulation implies negotiated power that will be imposed on certain actors: in this case, farmers.

CDA builds upon the concepts of discourse and power (Hewitt 2009). In this paper, discourses are understood as "semiotic ways of constructing aspects of the world, which can generally be identified with different positions or perspectives of different groups of social actors" (Fairclough 2013). The key of CDA is to grasp the semiotic features of the discourse contained in the regulation in question, and put these in relation with the knowledge available about these social practices.

The work of Alvesson and Karreman on discourse analysis (2000) is also relevant and makes a structural contribution to this paper. They point out four different discourse analysis approaches: micro discourse approach, consisting in the analysis of language of social text; meso discourse approach, which consists in bringing the language in a context and finding broader patterns that can be generalized in a broader context; grand discourse approach, which refers to constitute organizational reality, for example dominating language use about corporate culture or ideology; and mega discourse approach, which refers to language constituting a certain type of phenomena (Alvesson and Karreman 2000). Because of the opportunities that these approaches open up in exploring the regulation, a threefold approach will be used in the analysis including micro, meso and grand discourse approach that will be called macro for convenience. It is important to note that we will make a linguistic use with CDA, but it will not link to mega phenomenological discourses due the impossibility of generally grounding the results of the analysis.

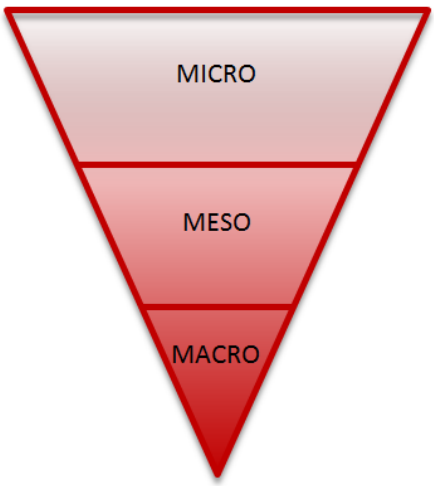

Figure 2 Analysis funnel

Although van Dijk (1998) reject the idea of distinguishing the analysis between micro and macro when using CDA, it is here argued that in this case it will help to fully explore the meaning of the regulation in question insofar as it helps to uncover intersections across different layers of meanings

by transposing the meanings on different context. Indeed, the proposed threefold approach is helpful to better understand the complexity of the regulation. The analysis will in fact enable to discover overlapping layers of meaning.

Further CDA is particularly useful insofar as it allows us to better understand what prescriptive characters contained in a regulation contribute to shape the condition of farmers and the environment.

It is important to note that the aim of CDA is not to explain the ideologies represented in the text, nor is the goal to provide commentary on the text. Rather we aim to identify and describe patterns of domination. Hence the results of such analysis should be understood as a multi entangled process that involved a background as a basis for analysis, which is further brought into relation with multi-disciplinary knowledge available about the practices proposed in the regulation. We further recognise that by only taking into account one single regulation, not all semiotic features that characterize existing challenges to small-scale family farming will be explored. For this reason it is important to acknowledge how there are extra semiotic features such as the relation between farmers and agro-food industry and the bureaucracy of Member States that will be taken in consideration but not analysed. Another acknowledged limitation of this approach is that by using a CDA approach, we are unable to assess the impacts on farmers and the environment because it does not give the ground for such assessment. However, our objective in this paper is to limit our analysis to the policy level so as to better understand the construction and potential problems of the policy itself, recognising that policies have material impacts.

3 Case

The voluntary payment scheme about 'agricultural practices beneficial for the climate and the environment' presents three agricultural practices farmers. Greening was a novel introduction to the 2013 CAP reform. The aim of including greening schemes into the CAP was to enhance environmental performance by redesign the structure of direct payments to include a "Greening" component. The idea is to reward farmers who adopt and maintain sustainable agricultural land practices as defined by the Commission. The policy thus recognises not only that farmers who invest in sustainable practices are often not adequately compensated for the public good they provide, but also that market prices fail to reflect the cost and effort involved. Under the 2013 CAP green direct payments account for 30% of EU countries' direct payment budgets. Under the CAP, direct payments are granted directly to farmers as a way of ensuring a financial safety net and tend to be granted in the form of a basic income support. The payments are decoupled from production and help to stabilise farm income which, as noted above, are subject to volatility. To be eligible for green payments farmers receiving area-based payments must perform identified but non-contractual practices that benefit the environment and the climate every year, specifically related to of crop diversification, permanent grassland and ecological focus areas.

Crop diversification means that farmers with arable land between 10 and 30 hectares shall have at least two crops and the main crop shall not exceed 75%. Farmers with more than 30 hectares shall have at least three crops, the main crop should not exceed 75% and the two main crops shall not cover more than the 95%. A main exemption regards land covered by fallow, grassland and land covered by water. Permanent grassland relates to a ban on ploughing or conversion of permanent grassland of areas under EU directives (94/43/EEC and 2009/147/EC). Member States have the responsibility of ensuring that total area of permanent grassland declared in 2015 does not decrease. Ecological focus area is applicable to farmers with more than 15 hectares who dedicate at least 7% of their total land to the creation of an ecological focus area. This includes land lying fallow, terraces, buffer stripes, and agroforestry. This practice does not apply to holdings where 75% of the land is used for grasses or leguminous, under water land or in areas facing natural constraints under European regulation.

Failure to follow the "Greening" rules leads to reduced payments, reflecting the number of hectares identified as non-compliant. Farmers that participate in the Small Farmers' Scheme are not eligible for proportionality and administrative reasons. Further, farmers practicing organic agriculture are exempt because they automatically receive "Greening" payments for their holdings.

Key to understanding the potential material implications of the policy is first understanding how terms are defined. In what follows we present and analyse the definitions included in the policy. We then present the key insights into the potential implications of this scheme for small-scale family-famers as uncovered from the three-fold critical discourse analysis. We focus specifically on the issues that emerged from the three-fold critical discourse analysis: unclear formulation of the chapter's title, exemptions, practices offered conflicting activities performed and the use of chemical inputs, equivalent practices, power and discrepancies amongst European farmers, leguminous production, unclear justifications and definitions within the scheme, financial supply and reflections on the practices proposed.

4 Analysis

4.1 Definitions

From the micro analysis, the first incongruences of the policy appear in the formulation of the definitions.

Farmers

> *"farmer" means a natural or legal person, or a group of natural or legal persons, regardless of the legal status granted to such group and its members by national law, whose holding is situated within the territorial scope of the Treaties, as defined in Article 52 TEU in conjunction with Articles 349 and 355 TFEU, and who exercises an agricultural activity.*
>
> (European Commission 2013b)

Looking at the definition of farmers, the Commission conceived of them as either a natural or legal person, or a group of persons. In this way not only farmers have access to payments but also corporations such as agro food industries who exercise an agricultural activity. As noted above, the activities, experiences and objectives of farmers differ substantially, especially across spatial scales. With this definition farmers are homogenised when it is evident that agro corporations (legal person) are often detached from family farmers' realities in terms of productive means, size and output. Further, it is not clear if the farmer has a technical or economic responsibility. The lack of specification might contribute to the ambiguity of the definition.

Holding

> *"holding" means all the units used for agricultural activities and managed by a farmer situated within the territory of the same Member State.*
>
> (European Commission 2013b)

From the definition of holding it is not clear whether it represents an economic unit or if it rather entails a set of possessions such as land, livestock and production means. The holding in fact is understood as 'all the units', 'used for agricultural activities' and 'managed by a farmer'. The ambiguity left by this definition might favour actors who do not necessarily do the work of farming, while also including other actors such corporations, a concern also raised above. It is important to distinguish differences among holdings. Size and type in fact characterize the structure of the holdings. Agricultural activity

> *"agricultural activity" means:*
>
> *(i) production, rearing or growing of agricultural products, including harvesting, milking, breeding animals, and keeping animals for farming purposes,*
>
> *(ii) maintaining an agricultural area in a state which makes it suitable for grazing or cultivation without preparatory action going beyond usual agricultural methods and*

machineries, based on criteria established by Member States on the basis of a framework established by the Commission, or

(iii) carrying out a minimum activity, defined by Member States, on agricultural areas naturally kept in a state suitable for grazing or cultivation.

(European Commission 2013b)

The definition reflects the agricultural activity performed by farmers via their holdings. The definition clearly outlines the relevant activities. In this representation the activity that give payment entitlement to farmers are mentioned. However it is difficult to understand from such a definition, how the Commission distinguishes amongst the multiple activities performed by farmers and the related outcomes these activities can have. Especially the section 'carrying out a minimum activity defined by Member States' might imply discrepancies among countries. A more elaborated distinction among farming activities might mark the differences among beneficiaries and their activities.

It is important to note how with the above definitions the Commission agrees on a specific meaning but the definitions are subject to wider interpretation by Member States and the national bodies in charge of delivering the policy.

We argue that it remains problematic that differences among farmers are not accounted for in the definition. Farmers are grouped together without consideration of the differences in size (hectares) and output (yield). This homogenises their diversity as well as their contribution to the "Greening" to the climate and the environment. A difference emerges in the application of certain features of the payment scheme analysed however without a clear link indicating the efficacy of such choices.

Having reviewed the definitions included in the regulation, attention now turns to the articles of the payment schemes, and in particular to the key issues emerged.

Article	Title	Objective
43	General rules	Introduction of agricultural practices and their features including exceptions
44	Crop diversification	Describe the cultivation of extra crops on arable land
45	Permanent grassland	Describe the ban on permanent grass conversion and plough
46	Ecological focus area	Describe the creation of biodiversity spots
47	Financial provision	Describe payments modes

Figure 3 Chapter's articles and objectives

4.2 Unclear formulation of the chapter's title

From the title of the regulation 'Payment for agricultural practices beneficial for the climate and the environment', it is implied that there are agricultural practices beneficial and not beneficial for the climate and the environment. The construction of what is deemed to be beneficial is crucial as it entails specific effects on the climate and the environment, but also links to farming practices. As the designation process has been influenced by the opinion of the public, stakeholders and research institute, the definition of beneficial can vary. As noted above, the Commission has identified three practices it deems beneficial enough for financial compensation but the scope of interpretation of these practices remains varied and at the same time while the selection of just three categories of practices might excludes multiple other practices also beneficial.

4.3 Exemptions

The scheme presents numerous exemptions from compliance with the practices proposed, for example for farmers whose holdings are situated in areas covered by directives on the conservation of natural habitats (92/43/EEC) and establishing a framework for Community action in the field of water policy (2000/60EC) or of wild fauna and flora or on the conservation of wild birds (2009/147/EC), which are also entitled to the payment. In this way farmers that already participate in environmental schemes do

not need to comply with the obligations to obtain the payment. Farmers practicing organic farming shall also be entitled ipso facto to the payment although only when they comply with European regulation on organic agriculture. It is interesting to note that the Commission recognises and considers organic agricultural as equivalent to the other practices beneficial for the climate and the environment. The meso analysis uncovered how organic agriculture is beneficial for the environment, biodiversity and particularly for farmland wildlife (Hole et al. 2005). In this way the Commission promotes other framework and certifications, given their positive impact.

Moreover in the specifications, the Commission claims that 'the obligation relating to crop diversification should be applied in a way that takes into account the difficulty for small-scale farmers to diversify, while continuing to make progress towards enhanced environmental benefit, and in particular the improvement of soil quality' (European Commission 2013b). According to such a claim, crop diversification should take into account the conditions of small farms, but in contrast in the regulation small farms, with less than 10 hectares, are not subject to such compliance. Further exceptions occur also for creation ecological focus areas. This article in fact does not apply:

> *a. where more than 75% of the arable land is used for the production of grasses or other herbaceous forage, is land lying fallow, is used for cultivation of leguminous crops, or is subject to a combination of those uses, provided that the arable area covered by those uses does not exceed 30 hectares*
>
> *b. where more than 75 % of the eligible agricultural area is permanent grassland, is used for the production of grasses or other herbaceous forage or for the cultivation of crops under water either for a significant part of the year or for a significant part of the crop cycle, or is subject to a combination of those uses, provided that the arable area not covered by these uses does not exceed 30 hectares*
>
> (European Commission 2013b)

It remains unclear how such practices can alleviate the decline in the number of farmers or support the environment. For example, the scheme can be interpreted as inefficient as it often excludes small-scale farmers and recipients of other environmental schemes from complying with the obligations about agricultural practices although entitling them to receive the payment. For this reason the suggested practices could have minimal effect on large farms and very little on the environment, Heinrich (2012), for example, shows how intensive farmers will have a negative impact of the "Greening" while extensive farmers will emerge almost indifferently.

By way of macro-level analysis we see how the scheme partially fails to reflect what it advocates about the enhancement of environmental performance. The scheme has the potential to leave unchanged the situation of small–scale family farmers while contributing minimally to the protection of the environment. However we acknowledge that other schemes have been developed to further contribute multiple objectives of the CAP.

The macro level also showed that the Commission brought up three measures which we anticipate may not efficiently contribute to the improvement of the climate and environment. The Commission assures payments to a wide slice of European farmers but exclude smallest-scale farmers from compliance with most agricultural practices contained in the chapter in question. This exemption might represent both an opportunity and a limitation. Small-scale family farmers can instead adopt other measures which can in turn have negative or positive impact on the environment and the climate. However they do not benefit from the opportunities to be compensated for the public good they provide.

4.4 Practices offered conflicting activities performed and the use of chemical inputs

As mentioned above some holdings participating in the scheme have to comply with the practices proposed by the Commission. However, many beneficiaries although practicing agriculture as main activity might have also other activities which are not addressed in this regulation that might

negatively contribute to the climate and environment. In agriculture different approaches can lead to different impacts (Donald et al. 2006; Hole et al. 2005; Stoate et al. 2001). There are several ways in which the adoption of certain agricultural practices might still be harmful for the climate and the environment for example by the use of chemical inputs. The use of chemical fertilizers and pesticides has been shown to be responsible for making plants vulnerable to disease, but also for water and soil contamination (Carvalho 2006). This in turn affects biodiversity services (Altieri 1999) and human activities. However within the chapter there is no reference about the use of chemical inputs in the three practices proposed. Further, although large-scale farmers are the main recipients for the implementation of the beneficial practices, some aspects of their practices, such as the use of chemical inputs, are not addressed in this scheme.

Finally, the contribution to the decline of farmers (notably smalls-scale family farmers) is dictated by how agriculture is practiced. With respect to the act of farming, the Commission does not often refer to agriculture types but rather to agricultural practices. It is important to note how the practices provided are intended to address the threats of agriculture on the environment and the climate but they do not include considerations of the socio-cultural implication that such scheme can have on farmers.

4.5 Equivalent practices

Within the chapter the Commission lists other equivalent practices besides the ones which can be designated by Member states. It also lists the practices that would entail the creation of ecological focus area which might include practices such as: land lying fallow, terraces, landscape features, buffer strips, and agroforestry. However it might appear restrictive to consider only the practices provided by the Commission and Member States beneficial. Farmers in fact have also the knowledge to design beneficial agricultural practices besides the fact that many small-scale family farmers might already adopt similar practices. Although opening up the designation to farmers and other actors practicing agriculture might lead to different interpretation of beneficial.

4.6 Power and discrepancies amongst European farmers

Throughout the payment scheme the Commission maintains the power over changes within the regulation. Furthermore the Commission empowers Member States to adopt extra equivalent practices, requirements for certification scheme and detailed rules for the calculation of the payment amount. Under the regulation, farmers are further obliged to comply with the regulation for instance within the maintenance of grassland when the ratio decreases by more than 5% Member States shall impose obligations to convert land into permanent grassland for farmers that have land at their disposal which was previously converted. Consequently these measures might have impact on the climate and the environment notwithstanding the impacts that it can have on the way farmers practice agriculture, with evident discrepancies among farmers as shown by Heinrich (2012).

Having Member States empowered to designate the areas and the obligations for farmers regarding the creation of ecological focus areas might lead to very different forms of implementation of the same practice among countries. At the same time, having the Commission setting criteria might also preclude other actors from taking part in this process. Although other stakeholders might have been consulted during the reform process, there is no guarantee of effective engagement in the decision making process. This might be considered problematic as it does not directly embrace farmer's knowledge.

Through the macro-level analysis we could note how the power held by the Commission is not used in fact to steer away from agricultural practices harmful for the environment. It is obvious that the Commission and Member States detain the power over such manoeuvres and their recipients. In this way such institutions control the development of local-level initiatives which are not conceived in the conventional way of thinking of the institutions. These institutions in this way preclude farmers and their initiative to be included in such payment schemes. Although different stakeholders have been consulted, by doing this, the Commission and Member States bring forward only the ideas conceived in their optic discarding the others.

4.7 Leguminous production

It is important to see how farmers cultivating leguminous are exempted from the creation of ecological focus areas. Leguminous are very diverse as their cultivation and its impacts on the environment and food consumption. It is evident that the support of these types of plantations can have completely different impacts on farmers and the environment.

In the meso analysis it emerged that leguminous crops includes beans, peas, lentils, forages and soybeans cultivated for different purpose. Leguminous crops are very important source of protein, but also widely used for biofuels and animal feed monocultures (Gelder, Kammeraat, and Kroes 2008). By not providing more explicit language around this exemption, the Commission might facilitates large productions of animal feed and biofuels that challenge land availability for food production but also promote the cultivation of food crops with high protein intake.

The macro-level analysis serves to highlights how the Commission supports the production of biofuels and animal feed by facilitating the production of leguminous. In Europe soybean oil (17%) is the second contributor to the production of biofuels, preceded by rapeseed oil (66%) and followed by palm oil (7%) (Gelder et al. 2008). Although, Europe imports large quantities of soybeans from the Americas, especially for the production of animal feed (Gelder et al. 2008) a local production could compensate production elsewhere. This support might represent an incentive for farmers to cultivate leguminous biofuels and food crops.

4.8 Unclear justifications and definitions within the scheme

It is noted in the specifications that permanent grassland should be maintained for 'the sake of its environmental benefits' (European Commission 2013b) but it is not clear what 'the sake of environmental benefits' for permanent grassland is and why to focus only on permanent grassland when other types of land could equally contribute to environmental benefits from maintenance.

It is also noted the Commission declares the objective of the creation of ecological focus areas as 'to safeguard and improve biodiversity on farms' (European Commission 2013b) but there is no definition of the term biodiversity mentioned in the regulation. The absence of a definition maintains ambiguity with respect to why the Commission thinks farmers should increase biodiversity.

It is also important to reflect on how the Commission claims to favour small-scale farms with the creation of ecological focus areas:

> *the obligation should be laid down in respect of the ecological focus area should be applied in a way that avoids putting disproportionate burden on smaller farms in comparison to the additional enhanced environmental benefit*
>
> (European Commission 2013b)

It is not clear how partially excluding small farms can ensure farmers benefit.

4.9 Financial supply

The dedication of 30% of the national ceiling to finance to pay the payments in annual trances per eligible hectares it is questionable whether it represents an opportune percentage to dedicate to the mentioned scheme. Besides Member States are entitled to converge more or less funds from the national ceiling towards specific schemes, in a way contributing to discrepancies among countries.

4.10 Reflections on the practices proposed

1. Crop diversification

Although an objective of this article is to enhance diversification, it rather ironically does not represent a very diverse idea of diversification. From the standpoint of the farmer, crop diversification

may not directly push for the growth of different varieties but rather mark an obligation for extra crops.

Crop diversification can be a tool to increase biodiversity (Altieri 1999), at the same time, and as noted above, it could also represent an additional burden to farmers. From an agroecological point of view crop diversification can also be understood as a combination of crop strengths to favour a dual plant support. Agroecological diversification could lead to higher productivity, stability and ecological resilience, improve soil quality, reduce pest abundance (Altieri 1999, 2002). Moreover, agroecology systems are dependent on their implementation taking in account markets, machinery but also labour (Altieri and Nicholls 2012). The impact of such practice could have different outcomes based on the eligible hectares. Other practices such as crop rotation could also represent a valid alternative.

As further emerged from our analysis, there are likely to be limited benefits for the climate and the environment through crop diversification as laid out in article 44. Only a small share of the land (2%) will be subject to crop diversification (European Commission 2011a) further characterizing the ecological inefficiency this policy. Additionally, the costs associated with diversification could both positively or negatively impact farm income and revenues. Crop diversification might further have impact on agriculture and farming practices, dictating to farmers from Brussels the way to practice agriculture. Lastly crop diversification might entail costly monitoring.

2. Permanent grassland maintenance

In Europe there are many types of land that could also be "maintained" such as forests facing deforestation and marginal lands facing abandonment. In this chapter, the Commission is focussed only on the maintenance of grasslands. However the lands subject to the maintenance as described in the scheme might also have other uses as much important for farmers.

3. Ecological focus area

In the designation of ecological focus areas, biodiversity is not defined but it is described in terms of how ecological focus areas ought to be. Yet, there are many ways to safeguard and improve biodiversity that are not included within the description of the practices. As such, the scheme could push farmers into the development of ecological focus areas over other activities that maintain agricultural practices while also enhancing ecosystems. Further, a dedication of 7% of the whole agricultural land might represent a marginal effort to reach the above assumed goals.

Conclusions

Overall the introduction of the "Greening" scheme represents a CAP measure for the environment and *the climate. However, as our analysis illustrates, with respect to the direct payment scheme on* 'agricultural practices beneficial for the environment and the climate' in the formulation of the scheme, the Commission has left itself vulnerable to ambiguities and tensions that could prove counter-productive to advancing the CAP's objectives. As we have described above, key limitations can be identified as: unclear formulation of the chapter's title, exemptions, practices offered conflicting activities performed and the use of chemical inputs, equivalent practices, power and discrepancies amongst European farmers, leguminous production, unclear justifications and definitions within the scheme, financial supply and reflections on the practices proposed.

A key means by which the European Commission intends to achieve this is by way of direct payments. Although widely criticised, for being among other things, unevenly distributed (Fritz 2011), direct payments in the current CAP are proposed with a different structure.

The analysis unveiled multiple imprecisions in the formulation of the regulation The micro analysis uncovered imprecise conceptualization of farmer by including corporations without taking in account the difference among them. It further showed unclear justification of the practices proposed. This can lead to inconsistencies in interpretations. Moreover, the scheme includes many exemptions. The

practices proposed often exempt small-scale farmers (with less than 15 hectares) from the compliance but in turn do not tackle all the other aspects that negatively affect the environment such as the use of chemical input and the consequences derived through its use.

The exemption of leguminous producers from the compliance with the creation of ecological focus areas is unexpected. In fact such exemption might have different flaps on agriculture. It might represent an incentive for the production of both animal and human food with high protein intake but also biofuels.

Although the regulation has been designated to take into account the opinion of different stakeholders of the agricultural sector, the text shows how the Commission hold power over it delegating Member States which can influence the impact of this policy. The power maintained by the Commission and Member States with this regulation imposes rules that might be in conflict with farmer's decisions, ethics and values. Farmers in fact are not allowed to use land as they want especially when they have to adopt crop diversification or convert land uses. This might hamper the development of specific farming practices designated by farmers which are still beneficial for the environment and the climate but not included in this scheme. Moreover given the fact that farmers and farming practices substantial differ across Europe, that Member States can adopt equivalent practices and that each national bureaucracy unfolds differently the implications in this regulation will surely have discrepancies on the effects among European farmers and their diversity. We have also illustrated how this regulation, given its exemptions, the practices proposed and their formulation can still be harmful for the environment and the climate leaving uncertainties about the efficacy of the scheme proposed.

We also note that many extra semiotic features did not manifest in the analysis. For example, the power exercised from agribusiness extends beyond the specific scheme analysed. However, the scheme analysed does not specifically tackle the unequal power relations between farmers and agribusiness. But it is important to say how these relations might further take place outside the regulative arena. Thus international policies remain the driver of such global, and then local dynamics in terms of power among actors involved in food production, process and trade. We acknowledge a limitation of this study is that while these dynamics were taken in account they were not systematically explored. It is also possible that some of the issues addressed in the scheme analysed were additionally addressed in other payment schemes such as the Young farmer or the Small farmer schemes. At the same time it is important to note that the bureaucracy of Member States will facilitates the obtainment of the payment schemes. Bureaucracies differ substantially across Member States, leading to different implementation of the scheme. Therefore a different implementation might contribute to have different outcomes of this regulation among Member States.

Although deeply descriptive, this analysis does not represent an impact assessment of the policy. We argue that the information obtained can be useful to understand better the practices proposed in this scheme. Through an application of a structured CDA we have identified potential limitations and implications of the CAP scheme on greening for small-scale family farmers. We recognise that this is only a first step and that we must now understand research to understand if the potential impacts have materialised.

Further research might cross control the multiple other CAP's objectives. Especially other payment schemes such the small farmers scheme which is another new introduction among payment schemes that represent an opportunity and an incentive for new farmers that want to undertake a career in the agricultural sector.

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