

Brussels, 30 May 2022

**Re: Observations regarding Finland's CAP national Strategic Plan**

Dear Minister Antti Kurvinen,

Dear Director General Minna-Mari Kaila,

IFOAM Organics Europe would like to provide its observations regarding Finland's CAP Strategic Plan.

First of all, the European organic movement welcomes the efforts made by Finland to set a target of 25% organic farmland by 2030, which highlights the wish to support organic farming. However, we believe Finland has the potential to increase this target to 30% by 2030 to fairly contribute to the EU's overall objective of 25% by 2027 set in the Farm to Fork Strategy.

Besides, IFOAM Organics Europe agrees with several observations made by the European Commission in its Observation Letter sent on 31 March 2022. For instance, like mentioned by the Commission, 'there is no differentiation of support between conversion to and maintenance of organic farming' whereas there are specific circumstances during the conversion period. We encourage Finland to increase the support for the conversion to organic farming.

Moreover, the European organic movement would also like Finland to set interventions with increased environmental and climate ambition to be more in line with the Farm to Fork Strategy and the Green Deal. For instance, having at least two levels of compensation for vegetation cover during the winter, setting a higher support for green vegetation cover, having a lower support for stubble, and banning the use of plant protection products in the support measure would significantly improve the relative profitability of organic farming compared to farming practices with synthetic inputs.

Finally, IFOAM Organics Europe encourages Finland to remove unjustified restrictions on the possibility for organic farms to participate in other support measures such as eco-schemes. Indeed, the compensation for organic production is not planned to be paid for the area of grasslands and biodiversity fields, nor for the area of the environmental compensation protection zone measure, given the cultivation of these areas under the organic production conditions is not more demanding than these measures. The reduction of levels of payments for organic farmers will trigger a lack of attractiveness for organic farming compared to conventional farming. In this regard, Finland should recognise the potential of organic production and its benefits on climate, biodiversity, environment, soil and water quality, as well as animal welfare to improve the economic profitability of organic farmers.

We hope Finland will take into consideration our recommendations when reviewing its CAP Strategic Plan before its submission to the Commission for approval.

Yours sincerely,

Eduardo Cuoco,

IFOAM Organics Europe Director