

COM(2011) 625 : **Reasoned opinion** of the Luxembourg Parliament

The Luxemburgish Parliament checked the compliance with the principles of subsidiarity and proportionality of the Proposal for a regulation of the European Parliament and of the Council establishing rules for direct payments to farmers under support schemes within the framework of the common agricultural policy. It shares the opinion of its responsible committee that, in its current form, the Proposal **is not in compliance with the principle of proportionality** as it aims to define precisely the notion of an “active farmer” creating an inconceivable supplementary administrative burden. Even without a precise definition in the existing EU-texts, Luxembourg already achieved to exclude what might be considered as a misuse of public funds designed to maintain a productive, sustainable and diversified agriculture.

COM(2011) 625 : **Political opinion** of the Luxembourg Parliament

The main points stressed by the Committee of Agriculture, Viticulture and Rural Development are:

a) Concerning the planned “greening” of the first pillar of the CAP

For a series of reasons the Committee is opposed to proceed to a further “greening” of the CAP by integrating a new and specific payment at the first pillar of the CAP but pleads instead for introducing similar constraints into the corresponding programmes of the second pillar of the CAP. The integration of an “ecological payment” at the first pillar risks creating inconsistencies with existing environmental schemes in the second pillar.

The already realized progresses of member states in greening their agriculture should be taken into account.

The criterion of reserving 7% of arable land as a surface of high ecological value is regarded as exaggerated. This criterion should also be more precisely defined in order to avoid an implementation of this measure inconsistent with its spirit.

b) Concerning the planned convergence of direct payments

The already realized efforts in regionalizing direct payments made by Member States while implementing the mid-term review in 2005 have to be taken into account.