Modernising and Simplifying the Common Agricultural Policy (CAP)

Fields marked with * are mandatory.

A. ABOUT YOU
*Country of residence*

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom
- Other

*You are replying*

- as an individual in your personal capacity
- in your professional capacity or on behalf of an organisation

*Respondent's first name*

Femke
*Respondent's last name

de Jong

*Respondent's professional email address

femke.dejong@carbonmarketwatch.org

*Name of the organisation

Carbon Market Watch

*Postal address of the organisation

117 rue d'albanie

*Type of organisation

Please select the answer option that fits best

- Private enterprise
- Professional consultancy, law firm, self-employed consultant
- Trade, business or professional association
- Non-governmental organisation, platform or network
- Research and academia
- Churches and religious communities
- Regional or local authority (public or mixed)
- National public authority
- International organisation
- Other

*How many employees does the company have?

- More than 250 employees (Large enterprise)
- Between 50 and 250 employees (Medium-sized enterprise)
- Between 10 and 49 employees (Small enterprise)
- Less than 10 employees (Micro enterprise)
- Self-employed (Micro enterprise)
**Please specify the sector.**
- Agriculture
- Forestry
- Rural development
- Agro-food
- Environmental protection
- Trade Union
- Public health
- Research / Think tank
- Civil society
- Other

**Is your organisation included in the Transparency Register?**
If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)
- Yes
- No
- Not applicable

**If so, please indicate your Register ID number.**

75365248559–90

**Your contribution,**
Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation (EC) N° 1049/2001](#)
- can be published with your organisation's information (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- can be published provided that your organisation remains anonymous (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

**B. AGRICULTURE, RURAL AREAS AND THE CAP TODAY**

*Where asked to select, please choose up to 3 or 5 answers as indicated.*
1. Which are the most important challenges for EU agriculture and rural areas?

*at most 3 choice(s)*

- Fair standard of living for farmers
- Adaptation to trends in consumer/societal demands
- Pressures on the environment and on natural resources
- Climate change (mitigation and adaptation)
- Lack of jobs and growth in rural areas
- Uneven territorial development throughout the EU

2. Which of the current CAP policy tools are best suited to meet the challenges identified above?

*at most 5 choice(s)*

- Decoupled payments to farmers
- Coupled support
- Support for Rural Development environment and climate actions in agriculture and rural areas
- Support for Rural Development investments in physical and human capital in agriculture and rural areas
- Trade measures
- Market safety nets (e.g. market intervention)
- Risk management schemes
- Support for integration into producers' organisations
- Regulatory approaches (such as standards and rules)

3. To what extent does the current CAP successfully address these challenges?

- To a large extent
- To a fairly good extent
- To some extent only
- Not at all
- Don't know

4. Which of the following do you think are the most important contributions of farmers in our society?

*at most 3 choice(s)*

- Ensuring that enough food is available
- Supplying healthy, safe and diversified products (quality of food)
- Protecting the environment (soils, water, air, biodiversity) and landscapes
- Addressing climate change (both mitigation and adaptation)
- Contributing to renewable energy
- Maintaining economic activity and employment in rural areas
- Contributing to EU trade performance
- Ensuring the health and welfare of farm animals
5. To what extent do you agree with the following statement:

<table>
<thead>
<tr>
<th>Statement</th>
<th>Largely agree</th>
<th>Partially agree</th>
<th>Partially disagree</th>
<th>Largely disagree</th>
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</thead>
<tbody>
<tr>
<td>Farm income is still significantly lower than the average EU income</td>
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<td>EU farmers face stricter requirements than non-EU ones</td>
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<td>Farmers get a limited share of the prices consumers pay</td>
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<tr>
<td>Farmers need to make heavy investments for their businesses to be viable</td>
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6. Which are the most important environmental challenges faced by agriculture? (at most 3 choice(s))

- [x] Reduction of soil degradation
- [x] Protection of biodiversity
- [ ] Preservation of genetic diversity such as traditional/old varieties and breeds
- [ ] Reduction of water pollution
- [ ] Rationalise use of water
- [x] More sustainable use of pesticide and fertilisers
- [ ] Decrease air pollution
- [ ] Environmental risks such as fires, floods etc.

7. To what extent does the current CAP successfully address these environmental challenges?

- [ ] To a large extent
- [ ] To a fairly good extent
- [ ] To some extent only
- [x] Not at all
- [ ] Don't know
8. What are the main barriers to becoming a farmer?

*at most 5 choice(s)*

- Low profitability
- High prices of land
- Land regulations
- Difficulties to access credit
- Complexity of insurance schemes
- Inheritance laws
- Taxation
- Administrative requirements
- Access to updated knowledge/technologies
- Image of the sector

9. What do you see as major drivers for innovation in agriculture, forestry and the rural economy?

*at most 5 choice(s)*

- Access to vocational training and relevant information
- Access to advisory services delivering farm-tailored solutions
- Dissemination of knowledge
- Financial /investment incentives / support for innovative projects
- New technologies and agricultural inputs
- Support for adjusting to new societal demands (i.e. nutritional guidelines)
- Support to the development of the circular economy
- Better involvement of producers throughout the value chains (up until the consumer)
- New partnerships between different actors (i.e. between farmers, civil society, researchers…)
- Research and the provision of knowledge targeted to farmers’ needs
10. Since 2003, the Farm Advisory Service (FAS) aims at helping farmers to better understand and meet EU rules and good agricultural and environmental conditions. How would you characterise the current situation of the FAS in your respective territory, as regards...

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<th>Satisfactory</th>
<th>Neutral</th>
<th>Not Satisfactory</th>
<th>Don't know</th>
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<tbody>
<tr>
<td>Availability of advice</td>
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<td>Access to advice</td>
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<td>Quality of the service provided</td>
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<td>Independence of advisors</td>
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<td>Transfer of knowledge</td>
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<tr>
<td>Dissemination of new knowledge</td>
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11. To what extent did recent CAP reforms pay sufficient attention to Policy Coherence for Development?

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<th>To a large extent</th>
<th>To a fairly good extent</th>
<th>To some extent only</th>
<th>Not at all</th>
<th>Don't know</th>
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<tr>
<td>Overall coherence with EU Development Policy and Humanitarian Action</td>
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<td>EU exports to developing countries</td>
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<td>EU imports from developing countries</td>
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<td>Impact on local agricultural production in developing countries including land-use change</td>
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<tr>
<td>The availability and affordability of agricultural goods in developing countries</td>
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</table>
12. What are the main problems/obstacles preventing the current policy from successfully delivering on its objectives? What are the drivers behind these problems?

The current governance and decision-making process of the CAP is a main barrier preventing the current policy from delivering on its objectives. Representing almost 40% of the EU budget, the CAP has to be aligned with the EU’s environmental, climate and development objectives. This means that many more relevant stakeholders need to be involved in the discussions on the CAP. From a climate perspective, the CAP has not led to a desperately needed shift in agricultural practices. Agriculture is currently responsible for around 10% of the EU’s greenhouse gas emissions and these emissions are projected to rise in the coming years. This raises questions about the effectiveness of the €16 billion euro “greening” of the CAP. The CAP has moreover failed to implement the “polluter-pays” principle, and often the polluter is paid instead. Currently the largest share of the budget is directed to the biggest and most polluting farms, while a majority of farmers that host the most biodiversity on their lands lose out. Including other voices in the future CAP negotiations will help to promote the links between the CAP and other policies (such as the Effort Sharing and LULUCF Regulations as well as air quality legislation). This can help ensure that in the future, public money delivers public goods and the CAP reform provides results-based payments for specific environmental or social deliverables. There is a need for a clear decarbonization agenda for the sector to reach net zero in 2050.

13. Which elements of the current CAP are the most burdensome or complex and why?

There are certain areas where the direct payments under the CAP result in unnecessary burdens. The flexibility granted to Member States in how the greening payments are implemented has led to ineffective results for the environment and is seen as burdensome by farmers. EU-harmonized and better defined environmental requirements will avoid confusion, unequal treatment and excess burden on farmers.

The CAP reform must take into account the minimum necessary requirements to achieve the objective of sustainable management of natural resources and keeping global warming to well below 2 degrees Celsius. Clearer rules for more targeted measures can hence also ensure that payments have a perceptible environmental benefit.

C. OBJECTIVES AND GOVERNANCE

Please indicate the most relevant priorities for which the CAP should do more.

*at most 3 choice(s)*

- [x] Boosting investment, growth and employment
- [ ] Improving connectivity and digitalisation of the rural economy
- [ ] Mitigating and adapting to the impact of Climate Change and providing renewable energy
- [ ] Strengthening the EU Single Market
- [ ] Participating in world trade
- [ ] Help addressing challenges related to migration

15. Which of the following should be the most important objectives of the CAP?

*at most 5 choice(s)*

- [x] Ensuring a fair standard of living for farmers
- [x] Addressing market uncertainties
- [x] Securing food supply at reasonable prices for consumers
- [x] Encouraging the supply of healthy and quality products
- [x] Contributing to a high level of environmental protection across the EU
- [x] Mitigating and adapting to the impact of climate change
- [x] Developing rural areas while taking care of the countryside
- [ ] Achieving a balanced territorial development
As the CAP has outlined environmental, social and economic objectives for agriculture a prominently absent objective is sustainable development. Now that the Sustainable Development Goals (SDGs) have been developed, providing concrete indicators for progress, the CAP should respond to these international commitments. The following are particularly relevant to the CAP:
- Zero hunger
- Good health and well-being
- Clean water and sanitation
- Sustainable communities
- Responsible consumption and production
- Climate action
- Life on land

Additionally, the CAP should be held to the objectives of The Paris Agreement on Climate Change and The Global Convention on Biological Diversity (CBD) to ensure a balanced approach to the multiple objectives of the sector. A modernized CAP must be set in the context of a clear climate strategy for the agricultural sector with the objective of reaching net zero emissions by 2050.
17. Do you agree with the following statement: "It makes sense to have a Common Agricultural Policy because we need …" 

<table>
<thead>
<tr>
<th>Problem</th>
<th>Largely agree</th>
<th>Partially agree</th>
<th>Partially disagree</th>
<th>Largely disagree</th>
<th>Don’t know</th>
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<tbody>
<tr>
<td>Common rules, as part of the Single Market (market organisation, trade, competition rules, food safety standards)</td>
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<td>Common objectives to tackle cross-border challenges (food security, environment, climate change, biodiversity…)</td>
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<td>A common budget as it is more efficient</td>
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<td>Economic, social and territorial cohesion and solidarity among Member States</td>
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<td>Common positions at international level making the EU a stronger global actor</td>
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<td>A common framework for sharing best practices, research results, innovative ideas, mutual learning</td>
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</table>
18. At which level do you consider that the following CAP objectives should **primarily** be dealt with?

<table>
<thead>
<tr>
<th>Objective</th>
<th>EU level</th>
<th>National level</th>
<th>Regional/local level</th>
<th>Don't know</th>
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</thead>
<tbody>
<tr>
<td>Ensuring a fair standard of living for farmers</td>
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<tr>
<td>Addressing market uncertainties</td>
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<tr>
<td>Foster competitiveness and innovation of agriculture</td>
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<tr>
<td>Securing food supply at reasonable prices for consumers</td>
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<tr>
<td>Encouraging the supply of healthy and quality products</td>
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<tr>
<td>Contributing to a high level of environmental protection across the EU</td>
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<td>Mitigating and adapting to the impact of climate change</td>
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<tr>
<td>Developing rural areas while taking care of the countryside</td>
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<tr>
<td>Achieving a balanced territorial development</td>
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D. AGRICULTURE, RURAL AREAS AND THE CAP TOMORROW
19. Do you agree with the following statements:

<table>
<thead>
<tr>
<th>Statement</th>
<th>Largely agree</th>
<th>Partially agree</th>
<th>Partially disagree</th>
<th>Largely disagree</th>
<th>Don't know</th>
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<tbody>
<tr>
<td>Farmers need direct income support</td>
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<tr>
<td>Other policies can have a strong impact on agricultural income (e.g. heritage/tax law, social and pension systems)</td>
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<td>Agricultural policy should deliver more benefits for environment and climate change</td>
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<td>Targeted investments to foster restructuring and innovation should be supported</td>
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<tr>
<td>Improving farmers’ position in value chains (including addressing Unfair Trading Practices)</td>
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</table>

20. Do you think that the following actions under the CAP could improve the competitiveness of farmers?

<table>
<thead>
<tr>
<th>Action</th>
<th>Largely agree</th>
<th>Partially agree</th>
<th>Partially disagree</th>
<th>Largely disagree</th>
<th>Don't know</th>
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</thead>
<tbody>
<tr>
<td>Supporting the development of futures markets</td>
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<td>Enhancing transparency in the agricultural markets</td>
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<td>Supporting the integration of farmers in Producer Organisations</td>
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<td>Support for Research &amp; Innovation</td>
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<tr>
<td>Simplifying administrative procedures</td>
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</table>
21. Which of the following criteria are most relevant when allocating direct support?

*at most 5 choice(s)*

- Specific products and/or sectors
- Risk management tools
- Compensation to farming activities in Areas with Natural Constraints/ High Nature Value Areas
- Territories with higher agricultural potential
- Practices with the highest environmental/climate benefits
- Linkage to standards (e.g. food safety, labour)
- An equal level of support for farmers within the same territory
- Small producers
- Limit in support for large beneficiaries (capping)
- Young Farmers

22. Which actions could further improve the EU export performance?

*at most 3 choice(s)*

- Export promotion
- Export credits
- Specific action on Geographical Indications
- Further trade liberalisation
- Address non-tariff barriers
- No action needed

23. Considering consumer and wider societal demands, where can the linkage between CAP and standards be improved?

*at most 3 choice(s)*

- Food safety standards
- Human nutrition standards and guidelines
- Standards for fair trade products
- Standards for organic products
- Environmental and climate standards
- Standards for the use of antimicrobials/pesticides
- Animal and plant health standards
- Animal welfare standards
- Labour standards
24. When it comes to meeting higher production standards, do you agree with the following statements?

<table>
<thead>
<tr>
<th>Statement</th>
<th>Largely agree</th>
<th>Partially agree</th>
<th>Partially disagree</th>
<th>Largely disagree</th>
<th>Don't know</th>
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<tbody>
<tr>
<td>Enhanced results can be achieved with financial incentives on a voluntary basis, without increasing mandatory levels</td>
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<tr>
<td>If mandatory levels are increased, farmers need support</td>
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<tr>
<td>Farmers have to respect stricter rules without specific financial support</td>
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<tr>
<td>Awareness campaigns are needed to raise the willingness of consumers to pay more for farmers' respect of stricter standards</td>
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25. For which of the following environmental protection objectives should the CAP do more?

*at most 3 choice(s)*

- Prevention and reduction of water pollution (pesticides, fertilisers)
- Sustainable use of water
- Prevention of environmental risks such as floods
- Prevention of biodiversity loss
- Prevention and reduction of soil erosion
- Avoiding soil salinization, compaction and desertification
- Contribution to the Air Quality Plans
26. Which are the most important objectives for the CAP to better address climate change?

- Reducing Green House Gas (GHG) emissions in the agricultural sector
- Fostering carbon conservation and sequestration in agriculture and forestry
- Improving climate change adaptation and enhancing the resilience of agriculture production systems
- Promoting afforestation and sustainable forest management
- Providing sustainable renewable energy resources
- Promoting research to address plant and animal diseases linked to climate change
- Promoting diversification of farming systems

27. In which of the following areas do you consider that the CAP should strengthen its support to sustainable forest management?

- Forest fire prevention and restoration
- Mobilisation of forest biomass for the production of material and energy
- Increase of the resilience and protection of forest ecosystems
- Afforestation/reforestation
- Prevention of natural disasters and catastrophic events in forests such as pests or storms
- Agroforestry systems

28. Where should the CAP improve its contribution for rural areas?

- Fostering innovation through knowledge transfer, advice and vocational training
- Taking care of local know-how and products in line with EU’s diversity and providing the basis for EU quality products
- Addressing local needs by supporting the provision of local infrastructure/services (e.g. health care, child care, transport)
- Fostering the economic viability of agriculture throughout the EU, avoiding concentration of production and people in certain areas
- Enhancing the interplay between local production and local markets
- Enhancing quality of life and social inclusion of rural inhabitants
- Strengthening governance and local development through bottom-up initiatives such as LEADER
- Fostering rural tourism and recreation, including through the provision of landscapes benefits, cultural values and traditional local food
- Creating and maintaining jobs in rural areas, including in primary agricultural production
- Providing connectivity and digital solutions
- Contributing to societal and cultural capital for rural areas to stay vital living spaces and to establishing mutually beneficial rural-urban linkages
- By helping SMEs to create jobs in rural areas
29. How can the CAP better help young farmers or other young rural entrepreneurs?

At most 3 choice(s)

- Supporting business start-up
- Providing transitional top-up payments to young farmers
- Improving access to financial instruments
- Providing more support for investments
- Supporting knowledge transfer, advice and vocational training
- Putting in place incentives to stimulate the cooperation between different generations
- Incentivising the transfer of farms
- Supporting new forms of cooperation

30. What would be the best way to encourage innovation?

At most 3 choice(s)

- Support the engagement of farmers in innovative projects
- Address the knowledge gap amongst farmers
- Support knowledge exchange through better access to advisory services, networking among farmers and demonstration farms
- Improve the technical competence and impartiality of advisory services
- Develop IT infrastructure for knowledge exchange
- Provide better access to finance / investment

E. WRAP UP: MODERNISATION AND SIMPLIFICATION
31. Do you think the CAP could be simpler if:

<table>
<thead>
<tr>
<th></th>
<th>Largely agree</th>
<th>Partially agree</th>
<th>Partially disagree</th>
<th>Largely disagree</th>
<th>Don't know</th>
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<tbody>
<tr>
<td>Overlaps between Rural Development and other CAP Measures would be reduced</td>
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<td>Databases and technologies (remote sensing, smart phones) were better used to reduce the incidence of farm inspections</td>
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<td>E-government services were more extensively used</td>
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<td>Lump-sum approaches were extended</td>
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<tr>
<td>More choice was given to farmers in terms of environmental measures</td>
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32. Do you have concrete ideas for simplifying the CAP and reducing the administrative burden for farmers, beneficiaries (or public administrations)? Please specify and explain the reasons behind your suggestions.

1500 character(s) maximum

The CAP has been burdensome from the perspective of citizens who are interested in seeing the value of the investments. Complications arise due to the many exemptions and loopholes that undermine the objectives of the policy. Simplification of the policy can be achieved by abolishing the inefficient use of funds, in particular the first pillar payments that have no environmental or social requirements attached to them. Instead the budget must be refocused on targeted and smart measures that help achieve the EU’s environment and climate objectives. This also requires engagement with farmers to make activities work on the ground.
Modernising the CAP means a shift away from area-based payments supporting unsustainable practices and move towards the polluter-pays principle as the guiding objective. It will be key to ensure a right climate policy framework is in place to encourage longer-term actions in line with reaching net zero emissions by 2050, and ensure that the future CAP has the right incentives in place to support action on ground, capacity building and knowledge exchange.

The budget should be subject to verification and provide results-based payments for specific environmental or social deliverables. Interventions should follow a programmatic approach whereby concrete results are rewarded with payments, building on the European Commission’s LIFE programme and overseen by environmental authorities.

Special attention needs to be given to the promotion of healthier diets which can be achieved by setting up nutritional education programmes in schools and local projects in urban areas.

Finally, the transition should be given due attention by helping farmers who have invested in unsustainable farming models transition to more sustainable ones in the short term.