



EU's next long-term budget (MFF) post-2027

- Public Consultation Position -

Introduction

The European Vegetarian Union (EVU) is the umbrella association of 47 civil society organisations in 28 countries. The EVU represents the voice of the growing number of European consumers shifting towards a more plant-based diet. As such, we advocate for a favourable food environment that makes it easier to choose as well as produce more plant-based foods. www.euroveg.eu.

Given our scope, our consultation input will be limited to the budget that is currently being allocated or should be allocated to the food and agriculture sectors with emphasis on the next Common Agricultural Policy, Research and Innovation funds, as well as food security. In our view, **a holistic and cross-sectoral overview of food and agriculture policies under the MFF should be adopted.**

We also highlight the need to maintain current EU earmarking and program-specific allocation of funds to be distributed by the Member States. **We express our concern about the re-nationalisation of policies and single-market instability in the event of lump-sum allocations, which could undermine broader EU targets.**

Common Agricultural Policy

Given its substantial financial impact, historically representing one third of the EU's total budget, the CAP has a major influence on the EU's food system, environment, people's health, farmers' income, European competitiveness and security. The successive reforms of the CAP have so far failed to bring agriculture in Europe in line with climate and environmental protection, as stated in the Court of Auditors Special Report 16/2021. The economic benefits of past CAPs are also called into question with price uptakes by landowners and unequal distribution of funds based on farm sizes. Notably, 80% of the CAP funding is attributed to the 20% biggest farms¹.

European diets are misaligned with nutritional guidelines. These dietary imbalances not only have high environmental but also high health and economic costs. According to the Global Burden of Disease, in the EU, almost 1 million deaths per year can be attributed to poor diets,² which represents about 1 in 5 deaths.³ A key issue with our diets is the underconsumption of plant proteins, namely pulses. The scientific consensus shows that transitioning towards more plant-based diets could reduce premature mortality rates, healthcare costs and productivity loss.^{4,5,6,7} Currently, the global ratio of plant to animal protein consumption is about 60% to 40%.⁸ However, in the EU this value is reversed, with protein intake consisting of around 58% animal and only 42% plant protein.⁹ In fact, since 1961, Europeans have increased animal protein consumption by almost 80%, whilst reducing plant-based protein intake by about 11%.¹⁰ Europeans are under consuming fruits and vegetables in general. The CAP, as the main food production policy, **should support the reversal of these trends by making both production and consumption of plant-based foods (such as vegetables, legumes and pulses) more accessible.**

¹ European Court of Auditors, Half of EU climate spending but farm emissions are not decreasing, 2021. <https://op.europa.eu/webpub/eca/special-reports/cap-and-climate-16-2021/en/>

² European Commission. (2021, April 7). *EU burden from non-communicable diseases and key risk factors*. https://knowledge4policy.ec.europa.eu/health-promotion-knowledge-gateway/eu-burden-non-communicable-diseases-key-risk-factors_en

³ Organisation for Economic Cooperation and Development (OECD). (2020). *Health at a Glance: Europe 2020 : State of Health in the EU Cycle*. <https://doi.org/10.1787/82129230-en>

⁴ Nelson, M. E., Hamm, M. W., Hu, F. B., Abrams, S. A., & Griffin, T. S. (2016). Alignment of healthy Dietary Patterns and Environmental Sustainability: A Systematic review. *Advances in Nutrition*, 7(6), 1005–1025. <https://doi.org/10.3945/an.116.012567>

⁵ Tilman, D., & Clark, M. (2014b). Global diets link environmental sustainability and human health. *Nature*, 515(7528), 518–522. <https://doi.org/10.1038/nature13959>

⁶ Kim, B. F., Santo, R., Scatterday, A., Fry, J. P., Synk, C. M., Cebon, S. R., Mekonnen, M., Hoekstra, A. Y., De Pee, S., Bloem, M. W., Neff, R. A., & Nachman, K. E. (2020). Country-specific dietary shifts to mitigate climate and water crises. *Global Environmental Change-human and Policy Dimensions*, 62, 101926. <https://doi.org/10.1016/j.gloenvcha.2019.05.010>

⁷ Clark, M., Springmann, M., Hill, J., & Tilman, D. (2019). Multiple health and environmental impacts of foods. *Proceedings of the National Academy of Sciences of the United States of America*, 116(46), 23357–23362. <https://doi.org/10.1073/pnas.1906908116>

⁸ FAO (2024): Food Balances (2010-). FAOSTAT. <https://www.fao.org/faostat/en/#data/FBS>. Licence: CC-BY-4.0.

⁹ European Commission, Directorate-General for Agriculture and Rural Development. (2019). *EU agricultural outlook for markets and income 2019-2030*. <https://data.europa.eu/doi/10.2762/904294>

¹⁰ Our World in Data, Change in daily protein supply from animal and plant-based foods, European Union (27), 1961 to 2021 https://ourworldindata.org/grapher/daily-protein-supply-from-animal-and-plant-based-foods?stackMod=e:relative&country=~OWID_EU27 Accessed 08/01/2024.

Current dietary imbalances are also a root cause of food insecurity in the EU. This has been acknowledged by the the EU Drivers of Food Security,¹¹ and European Food Security Crisis Preparedness and Response Mechanism (EFSCM)¹². The issue of food security is more efficiently addressed when dietary needs and natural environmental constraints are taken into account. Thus, **the EU should aim for sovereignty in the production of the necessary foods for Europeans to maintain an optimal diet whilst ensuring efficient land use**. The EU imports 76% of its high protein feed¹³ and although data is lacking, current production of plant protein for food may not be aligned with increased demand or overall dietary guidelines. Increasing production of high protein feed in the EU can lead to increased competition for land use with other crops and uses, such as forestry. However, increasing the production of protein crops for food, aligning with dietary guidelines, could lead to a reduction in land use needs. According to SAPEA, 3.1 kg of crops that could feed humans are needed to produce 1 kg of meat instead¹⁴. More plant-based diets have been shown to reduce land-use needs.¹⁵ Therefore, **production and dietary shifts are necessary to ensure food security**.

Transitioning towards more plant-based diets has also been recognised as a key strategy to mitigate climate change, aligning with EU climate and environmental targets.^{16,17} The potential of production and dietary shifts has been acknowledged by the European Commission¹⁸, the IPCC¹⁹ and has been recommended by the 2023 Science Advice for Policy by European Academies (SAPEA),²⁰ the European Scientific Advisory Board on Climate Change²¹ and the European Environmental Agency (EEA).²²

Ultimately, it is clear that in order to align with the EU's current economic, climate, health and food security targets, a review of the CAP's objectives and instruments is required. Several

¹¹ European Commission. (2023). *Analysis of main drivers on food security*.

https://commission.europa.eu/publications/analysis-main-drivers-food-security_en

¹² European Food Security Crisis Preparedness and Response Mechanism (EFSCM) RECOMMENDATIONS ON WAYS TO MITIGATE RISKS AND VULNERABILITIES, INCLUDING STRUCTURAL ISSUES PUTTING AT RISK FOOD SUPPLY CHAINS, July 2023.

https://agriculture.ec.europa.eu/common-agricultural-policy/agri-food-supply-chain/ensuring-global-food-supply-and-food-security_en#documents

¹³ JRC, Closing the EU protein gap, 2024.

<https://publications.jrc.ec.europa.eu/repository/handle/JRC137180>

¹⁴ SAPEA, Science Advice for Policy by European Academies. (2023). Towards sustainable food consumption. <https://doi.org/10.5281/zenodo.8031939>

¹⁵ Poore, J. & T. Nemecek, Reducing food's environmental impacts through producers and consumers, 2018. *Science* 360(6392), 987–992. doi:10.1126/science.aag0216

¹⁶ European Environment Agency (2023). Transforming Europe's food system — Assessing the EU policy mix No 14/2022. <https://doi.org/10.2800/295264>

¹⁷ Berners-Lee, M., Kennelly, C., Watson, R. D., & Hewitt, C. N. (2018). Current global food production is sufficient to meet human nutritional needs in 2050 provided there is radical societal adaptation. *Elementa*, 6. <https://doi.org/10.1525/elementa.310>

¹⁸ EUR-LEX - 52020DC0381 - EN - EUR-LEX. (2020).

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381>

¹⁹ IPCC, Climate and Land

²⁰ SAPEA, Science Advice for Policy by European Academies. (2023). Towards sustainable food consumption. <https://doi.org/10.5281/zenodo.8031939>

²¹ ESABCC, Towards EU climate neutrality: progress, policy gaps and opportunities, 2024

<https://climate-advisory-board.europa.eu/reports-and-publications/towards-eu-climate-neutrality-progress-policy-gaps-and-opportunities>

²² EEA, Europe's sustainability transitions outlook Short-term action, long-term thinking, 2024

<https://www.eea.europa.eu/publications/europes-sustainability-transitions-outlook>

existing instruments could be used to support and reward farmers seizing opportunities in the plant-based sector, whilst increasing accessibility of plant-based foods for consumers.

CAP strategic objectives and CAP strategic Plans

The CAP 23-27 had 10 broad strategic objectives²³. From environment to fair income, healthy food to competitiveness. **An integral goal of the next CAP should be to link these strategic objectives with a new one for food security. This new strategic objective should be implemented based on the principle of protein diversification**, namely increasing the production of plant proteins for food and promoting consumption.

Protein diversification should also be introduced as a specific objective in CAP Strategic Plans and therefore, introduced in the performance reporting requirements. This approach allows freedom for Member States to decide how to implement the goal based on local diets, current production capacities and regional climates, reducing administrative opposition. Furthermore, the European Commission has already identified 8 Member-States with National Protein Strategies with the goal of increasing production of plant-protein for food.²⁴ Therefore, these recommendations could further support current and future plans of this kind.

Additionally, **we call on additional support and prioritisation of sustainable production methods such as organic, regenerative and agroforestry practices.** Farmers should be rewarded for adopting better and best practices as well as producing public goods, in particular the preservation of environmental services, independently of the foods produced.

Coupled Income Support

Coupled income support (CIS), holds a great potential for driving agricultural production and consumption. However, its current application highly contributes to promoting unsustainable farming, namely livestock production, which receives 70% of the total budget of CIS²⁵. Apart from livestock, CIS can also remunerate protein crops and fruits and vegetables, although this share is currently low, with only 14% dedicated to protein crops and 5% to the fruit and vegetable sector²⁶.

Although the use of CIS for protein crops specifically has improved in the CAP 23-27

²³ European Commission, Key policy objectives of the CAP 2023-27, https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27/key-policy-objectives-cap-2023-27_en

²⁴ European Commission, EU countries' initiatives to a more sustainable and resilient protein-supply system, 2024 https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/cereals/reducing-plan-protein-deficit-eu_en#eu-countries-initiatives

²⁵ DG Agriculture and Rural Development. (2023, July 19). *Approved 28 CAP Strategic Plans (2023-27)*. https://agriculture.ec.europa.eu/cap-my-country/cap-strategic-plans_en

²⁶ *Idem*.

compared to the previous cycle, it still represents a small percentage of total CIS and increases are expected to be led by just a few countries (LU, IE, FR, IT and ES).²⁷ The expected average annual CIS for protein crops during the current CAP is set at 600 million euros per year, compared to a total yearly expenditure of more than 4.000 million euros.²⁸

We therefore consider CIS to be an underutilized tool to support farmers producing protein crops, looking to diversify their income and contribute to food security goals. **We call on the next CAP proposal to rebalance current allocation for CIS increasing the budget utilised for protein crops, especially for traditional food crops** such as beans, lentils, peas, fava beans and chickpeas.

Eco-schemes, AECC and GAECs

Similarly to coupled income support, eco-schemes, GAECs (good agricultural and environmental conditions) and AECC (Agri-Environment and Climate Commitment) interventions hold significant potential for the Union and its Member-States and thus should be fully used to drive sustainable agricultural practices. Although these instruments have a limited scope, they've been shown to lead to improvements²⁹. While acknowledging the need for reduced bureaucracy for farmers, **the EVU stands for the full application of these instruments as approved in the last CAP, standing against "simplification" practices that may hinder long-term sustainability, productivity and competitiveness.**

The EVU and its members highly recommend increased support for Eco-Schemes and AECC interventions supporting leguminous crops, as a way to green production whilst diversifying farmers incomes. Although crop rotation/diversification of nitrogen fixing/leguminous crops is one of the most common agricultural practices supported by eco-schemes, they are still underused and completely left out by 8 Member-States (AT, CY, MT, CZ, LU, PT, SI, SK)³⁰. Similarly, under the rural development pillar, AECC interventions on leguminous crops are not included by several Member-States.³¹ Therefore, the use of leguminous crops in eco-schemes and AECC should be further supported. It should also be ensured that these crops are fully utilised by entering the food chain rather than being used solely as cover crops. In the same way, GAECs should be upheld and reinforced as a key tool for sustainable production.

²⁷ CAP interventions

https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/cereals/reducing-plan-protein-deficit-eu_en#cap-interventions

²⁸ Idem.

²⁹ BirdLife Europe, the European Environmental Bureau & WWF European Policy Office (2021). Will CAP eco-schemes be worth their name? An assessment of draft eco-schemes proposed by Member States. <https://eeb.org/library/will-cap-eco-schemes-be-worth-their-name/>

³⁰ European Commission, CAP Strategic Plans and protein crops, 2024. https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/cereals/reducing-plan-protein-deficit-eu_en#cap-interventions

³¹ Idem.

Sectoral support and investment support

Usually used for fruits and vegetables, wine and apiculture as mandatory interventions and hops and olive oil as optional specific support and the development of Producer Organisations (PO's) can have a significant impact in a sector. The current CAP introduced the possibility for Member States to develop sectoral support under "other sectors", with an extensive list included in the Strategic Plans Regulation³². The list includes dried leguminous vegetables, peas, chickpeas, beans, lentils, soy, lupin and faba beans.

Despite this possibility, except for two Sectoral Interventions (SI) planned on leguminous crops in Latvia and France (2024), CSPs lack specific support for leguminous crops farmers.³³

Given the alignment with the EU's health, environmental and food security goals, **we believe sectoral support for protein/leguminous crops should become one of the mandatory interventions in line with current rules for sectors such as wine, apiculture and fruits and vegetables.** Furthermore, given that we've identified with our members a significant lack of structure, investment, knowledge availability and sharing, as well as a weak value chain for legume farmers, **special measures should be put in place to develop POs in the leguminous crop sector.**

Within structural investments, the Rural Development, interventions on risk management, investments, cooperation and innovation are open to protein crops but without specific criteria compared to other sectors. With protein diversification as a CAP specific objective, **Rural Development support for investments in the supply chain as well as research and innovation for the legumes sector should be increased. Protein diversification could be introduced as a specific focus area policy measure under the European fund for rural development (EAFRD).**

Promotion policy

The Promotion of EU farm products also represents a key policy to nudge consumers towards buying certain foods. According to the implementation report of the previous period, the level of coherence between the promotion policy and EU climate and environmental policies differs and depends on product types, production methods and markets³⁴. In fact, the EU may have spent almost 200 million euros incentivising already unbalanced dietary

³² Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013

³³ European Commission, CAP Strategic Plans and protein crops, 2024.

https://agriculture.ec.europa.eu/farming/crop-productions-and-plant-based-products/cereals/reducing-plan-protein-deficit-eu_en#cap-interventions

³⁴ EUR-LEX - 52021DC0049 - EN - EUR-LEX. (2021).

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2021%3A49%3AFIN>

habits towards even more animal protein between 2014-2019³⁵. In 2023 alone, the Commission planned to spend almost 200 million euros promoting agri-food products³⁶, however, only about 20 million were earmarked for fruits and vegetables³⁷. This is inconsistent with climate, health and food security targets. **Thus, in line with the previous specific consultation for the Promotion policy we call on coherence from the promotion policy, establishing the promotion of healthy and sustainable diets as an objective.** Namely, the policy's budget could be proactively used to promote the consumption and therefore production of leguminous crops, supporting farmers and developing new markets.

We've also identified the **need for the legislative framework to facilitate access to the scheme for small farmers' organisations**, especially for those producing sustainable food products and the organic sector.

Research, innovation and development

The European Commission has already identified the need for further research, development and innovation funding for plant proteins.³⁸

Several plant protein projects have already been funded through the research programmes Horizon 2020, Horizon Europe and the European Innovation Partnership. This includes research into traditional legumes and alternative proteins. However, data for 2014-2020 shows that public funding for research in alternative proteins is smaller than that for animal products by a factor of 1,200X.³⁹ Although the situation has improved in recent years, there's still a significant imbalance in research leaving traditional legume crops for human consumption and alternative proteins (plant-based, fermented, cultivated) behind.⁴⁰ Since it has already been recognised by the European Commission that, considering the limited availability of land in the EU, alternative protein sources should be explored as an additional means to preserve food security and sustainability.⁴¹ **We call on the next MFF to increase**

³⁵ Eurogroup for Animals. (2021). *The EU campaigns to promote meat, eggs and dairy*.

<https://www.eurogroupforanimals.org/library/eu-campaigns-promote-meat-eggs-and-dairy>

³⁶ Directorate-general Agriculture and Rural Development. (2023, July 26). *Promotion of EU farm products*.

https://agriculture.ec.europa.eu/common-agricultural-policy/market-measures/promotion-eu-farm-products_en#promotioncampaignsinpractice

³⁷ European Commission, *€186 million to promote high quality and sustainable EU agri-food products*, 2022. https://ec.europa.eu/commission/presscorner/detail/en/ip_22_7769

³⁸ European Commission, *Research and Innovation for reducing the EU dependency on imported plant protein*, 2024.

https://agriculture.ec.europa.eu/document/download/4c8ea658-7b9a-43e5-9ee6-49bea8a87b84_en?filename=research_en.pdf

³⁹ Lambin et al. *Public policies and vested interests preserve the animal farming status quo at the expense of animal product analogs*, 2023.

[https://www.cell.com/one-earth/fulltext/S2590-3322\(23\)00347-0](https://www.cell.com/one-earth/fulltext/S2590-3322(23)00347-0)

⁴⁰ European Commission, *Research and Innovation for reducing the EU dependency on imported plant protein*, 2024.

https://agriculture.ec.europa.eu/document/download/4c8ea658-7b9a-43e5-9ee6-49bea8a87b84_en?filename=research_en.pdf

⁴¹ Idem.

funding for R&I and R&D for traditional proteins as well as alternative proteins. This funding should be integrated but not limited to the following policies:

- Horizon Europe;
- Start-up and scale-up strategy;
- European strategy for research and technology infrastructures;
- European biotech act and bioeconomy strategy;
- Quality jobs roadmap;
- Competitiveness fund;
- Readiness 2030;

Readiness 2030

Although left out of the Readiness 2030 White paper, food and agriculture must be included and funded within the EU's defense vision. As a key strategic sector its inefficiencies and dependencies must be addressed not only in the perspective of food sovereignty but also defense. In the event of armed aggression or threats, management and protection of natural resources as well as feeding civilians and military adequately are essential. A recent report on EU food security from the European Food Security Crisis Preparedness and Response Mechanism (EFSCM) stated that the EU should promote “the adoption of sustainable production practices [...] and sustainable diets, to build a more resilient and sustainable food supply chain” and that certain dependencies could be tackled by “sustainable substitutes” and by “changes in consumption patterns”.⁴² On the same lines, the EEA has also stated in the European Climate Risk Assessment that “Production changes, dietary shifts and targeted social policies are further levers to ensure food security in a changing climate” and that “dietary shifts towards reduced consumption of animal-based products and reducing food waste can greatly improve the resource use efficiency of food production and improve food security under current and future climate conditions”.⁴³ Therefore, **investment and innovation in low-resource agriculture, shelf stable products such as alternative proteins and legumes should be seen as a mechanism to build resilience and reduce security risks.**

⁴² European Food Security Crisis Preparedness and Response Mechanism (EFSCM) RECOMMENDATIONS ON WAYS TO MITIGATE RISKS AND VULNERABILITIES, INCLUDING STRUCTURAL ISSUES PUTTING AT RISK FOOD SUPPLY CHAINS, July 2023. https://agriculture.ec.europa.eu/common-agricultural-policy/agri-food-supply-chain/ensuring-global-food-supply-and-food-security_en#documents

⁴³ EEA Report No 1/2024, European Climate Risk Assessment, 2024. <https://www.eea.europa.eu/publications/european-climate-risk-assessment>

Linking the levels

An EU plant-based action plan

Strategic investment in food and agriculture must be a central pillar of the EU's policy and budgetary framework. It is essential not only for strengthening European competitiveness and ensuring long-term food security, but also for delivering on the EU's objectives in health, climate resilience, environmental protection, and economic development. A robust agri-food system is essential to the Union's capacity to respond to global crises and geopolitical risks, making it central to the broader defense and strategic autonomy goals. **Integrating the recommendations in this consultation into the next MFF, could be achieved individually or under the development of an overarching strategy such as an EU Plant-Based Action Plan.**

An EU Plant-Based Action, with pulled funding across the highlighted policies, could support farmers, a just transition, create future-proof jobs whilst increasing competitiveness and food security. It has gathered support from the members of the Strategic Dialogue on Agriculture⁴⁴, received broad calls from civil society and farmers⁴⁵ as well as policymakers.⁴⁶

⁴⁴ A shared prospect for farming and food in Europe, 2024

https://agriculture.ec.europa.eu/overview-vision-agriculture-food/main-initiatives-strategic-dialogue-future-eu-agriculture_en

⁴⁵ BEUC, Large group of organisations call for an EU Action Plan for Plant-based Foods, 2025
<https://www.beuc.eu/tools/eu-action-plan-plant-based-foods>

⁴⁶ MEP letter to Commissioner Hansen on a protein diversification
https://www.linkedin.com/posts/annastrolenberg_letter-to-commissioner-hansen-activity-7293301745051422722-eYQE/?utm_source=share&utm_medium=member_desktop