

 EUROPEAN VEGETARIAN UNION

# OPPORTUNITIES FOR DIVERSIFICATION AND MORE PLANT PRODUCTION IN THE NEXT CAP

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**Analysis of the 2028-  
2034 CAP Proposals**



## Acknowledgement

We would like to express our gratitude to all those who contributed to this analysis. Special thanks go to the bright minds at IEEP and EEB, as well as to the one and only Professor Alan Matthews for their inspiring – previous and ongoing – work on the Common Agricultural Policy.

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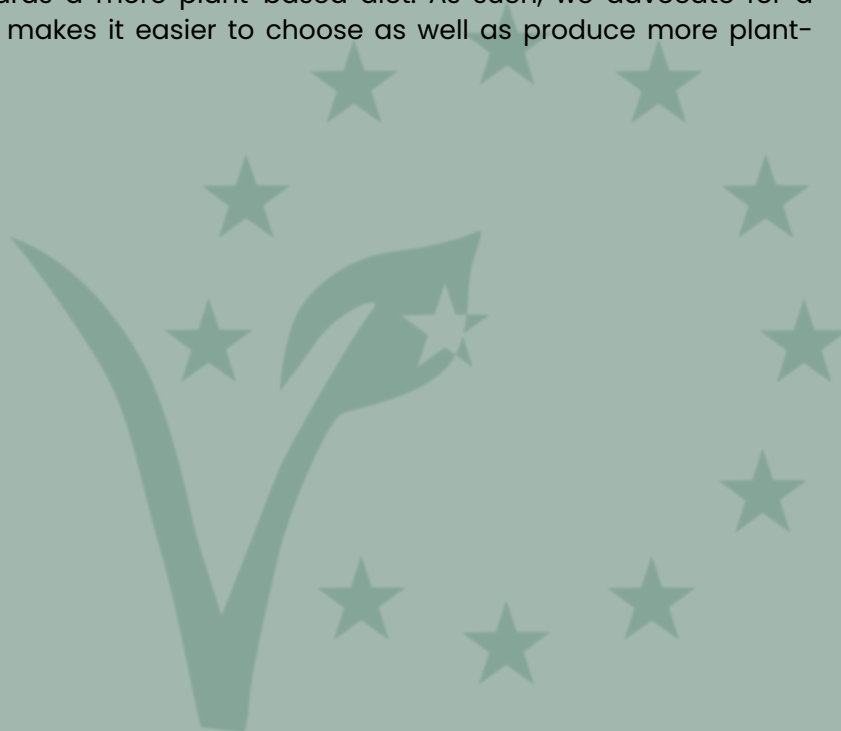


European Vegetarian Union (EVU) e.V.  
Meidlinger Hauptstraße 63/6  
1120 Vienna  
Austria

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Avenue des Arts 44  
Brussels  
Belgium  
[www.euroveg.eu](http://www.euroveg.eu)

The European Vegetarian Union (EVU) is the umbrella association of 48 civil society organisations in 29 European 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.



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# 1. EXECUTIVE SUMMARY

## PURPOSE AND BACKGROUND

In July of 2025, the European Commission published a set of proposals of importance for or directly dealing with the next programming period, 2028–2034, the Common Agricultural Policy.

EVU has looked into these CAP-related proposals (MFF, NRP, CAP, CMO) with two specific questions in mind: 1. Are there opportunities for farmers in the CAP proposals regarding more support for diversification and increasing the production of plant-based foods? and 2. Which parts of the proposals would need improvement by the co-legislators for more diverse and therefore sustainable and resilient agricultural system?

## FINDINGS

Our in-depth analysis of the CAP-related proposals has revealed several promising elements with clear potential to advance agricultural diversification and to strengthen plant and protein crop production in Europe, as well as several blind spots and potentially negative factors which need to be addressed.

For both the 8 positive elements as well as the 6 elements of concern, we have elaborated a set of priorities and recommendations for the negotiation and implementation of the next CAP.

## KEY MESSAGES

The CAP 2028–2034 should send a clear signal that diversification and increased plant-based production are central pillars of a resilient, competitive and future-proof European food system.

Diversification must become systemic: Support for crop and protein diversification should extend beyond nitrate-surplus areas and be embedded across CAP objectives, instruments, and monitoring.

- **Diversification needs time and certainty:** Multi-annual diversification and transition support, predictable investment aid, and strong advisory services are essential to de-risk shifts towards more plant production.
- **Rebalance financial incentives:** Coupled income support, investment aid, and redistribution mechanisms should clearly prioritise protein crops and sustainable plant production.
- **Build value chains, not just production:** The creation of a protein sector under the CMO is key to developing processing, marketing, and promotion structures for protein crops for human consumption.
- **Safeguard ambition and commonality:** Environmental ambition, ringfenced funding, and EU-level common rules are necessary to avoid renationalisation and uneven competition.
- **Ensure long-term governance:** Clear objectives, targets, monitoring, and mid-term review mechanisms must explicitly include protein diversification.

# OVERVIEW OF RECOMMENDATIONS

Below is a mapping of EVU's key recommendations for amending the CAP 2028-2034 related proposals to maximise their potential for protein diversification & increased plant-based production.

CAP Instrument / Area	Key EVU Recommendations
<b>1. Agri-environmental &amp; climate actions (Article 10 – CAP)</b>	Introduction of diversification support beyond nitrate-surplus areas; multi-annual transition support with dedicated funding; free diversification advisory services.
<b>2. Environmental spending (Article 35 – NRP)</b>	Ringfence environmental spending; maintain 100% EU funding for agri-environmental and climate schemes.
<b>3. Farm stewardship (Article 3 &amp; Annex I – CAP)</b>	No environmental backsliding compared to current CAP; ensure strong common rules for a level playing field for farmers; reintroduce crop rotation as a mandatory practice.
<b>4. Farm advisory services &amp; AKIS (Article 20 – CAP)</b>	Provide feasibility, cost, timeline, and market assessments to farmers for diversification and transition initiatives; support young farmers and new entrants on protein crops.
<b>5. Investment support (Article 13 – CAP &amp; Article 71 NRP)</b>	Recognise diversification and plant food production investments as a priority; apply sustainability safeguards.
<b>6. Coupled income support (Article 11 – CAP &amp; Art. 35 – NRP)</b>	Rebalance CIS towards protein crops and plant production; allow Member State downward flexibility; introduce minimum sustainability criteria linked to land capacity.
<b>7. Support for young farmers (Articles 14, 15 &amp; 16 – CAP)</b>	Prioritise plant-based and protein-crop enterprises; include sustainability criteria; strengthen advisory and educational support.

<b>CAP Instrument / Area</b>	<b>Key EVU Recommendations</b>
<b>8. Capping &amp; redistribution of payments (Article 6 – CAP)</b>	Support introduction of EU-level degressivity and capping rules; prioritise diversified farms; integrate sustainability and diversification criteria into redistribution.
<b>9. CAP objectives &amp; steering (Article 3 – NRP)</b>	Integrate protein diversification into CAP/NRPF objectives, Commission recommendations to Member States, and performance monitoring.
<b>10. NRP Plans &amp; mid-term review (Articles 24 &amp; 25 – NRP)</b>	Set clear diversification targets; define review criteria including protein diversification; ensure robust monitoring; prevent environmental backsliding.
<b>11. Creation of protein sector (Article 159 – CMO)</b>	Endorse creation of dedicated protein sector; recognise and support producer organisations; introduce origin labelling; facilitate access to promotion policy.
<b>12. CAP structure &amp; governance (NRP &amp; CAP)</b>	Maintain the two-pillar structure; ensure EU-level common rules; allow sufficient time for negotiation, implementation, and revision.
<b>13. Budgetary framework (MFF &amp; NRP)</b>	Reduce uncertainty through clearer agricultural budget guarantees; ringfence rural development funding within NRPF at least at current EAFRD levels.

## 2. INTRODUCTION

On July 16th 2026, the European Commission published its highly anticipated proposals for the programming period 2028-2034 of the Common Agricultural Policy.

In a proposed merger of funds of a dimension rarely seen in the history of the European Union, the Commission surprised many by proposing to regroup the CAP and other policies (cohesion policy, common fisheries policy, social climate fund...) into a National and Regional Partnership Fund (NRP).

The future shape and precise parameters of the Common Agricultural Policy – its next delivery model, the loss or keeping of its traditionally stand-alone nature and its exact budget – will be defined by the EU co-legislators Council and Parliament (and the Commission, to some extent) in the coming years of no-doubt difficult negotiations.

In the meantime, we wanted to assess the proposals currently on the table from a perspective of protein diversification and more support for plant production in general.

**→ What are the opportunities for increasing the production of plant-based foods in the CAP proposals and which parts of the proposals need improvement to ensure maximum impact for a more diverse and therefore sustainable and resilient agricultural system?**

### DISCLAIMERS:

1. The following pages focus on the concrete potential/positives and risks/negatives we have identified in the CAP proposals as regards more support for plant production across the European Union. For the 'why' – why the EU should provide more support for protein diversification and plant-based foods through the CAP in the first place – please consult EVU's previous publication on the CAP<sup>1</sup>.
2. The analysis presented here limits itself to the agricultural production aspects in the NRP and Common Market Organisation (CMO) proposals and does not address the EU school scheme or promotion policy.

# 3. PART I - PROMISING ELEMENTS

## NOTE TO THE READER:

While still of relevance, a few of the points in part I are broader than diversification and increased plant (protein) production. To facilitate reading these points, we have highlighted the parts that directly make the link to diversification and more support for plant production.

## 3.1. DIVERSIFICATION SUPPORT (IN NITRATE SURPLUS-AFFECTED AREAS)

Under the new voluntary agri-environmental and climate actions (Article 4<sup>2</sup>), which regroup current Pillar 1 ecoschemes and Pillar 2 agri-environmental commitments, the Commission's proposal explicitly mentions diversification support for farmers in areas already affected by a nitrate surplus (most often linked to a high livestock density).

The Commission foresees this kind of support to be voluntary for farmers to request but mandatory for Member States to offer<sup>3</sup>. This proposal is to be welcomed, as it recognises the importance of diversification from an environmental perspective and could significantly contribute to de-risking production shifts and diversification initiatives by farmers. Leguminous crops and their natural nitrate-fixing abilities should become a logical go-to option for such diversification schemes, as they already have for numerous ecoschemes under the current CAP.

The exact modalities of the proposed diversification support are yet to be defined at EU level or, a likely scenario, could also be defined at Member State level. Questions to raise would be: Which type of productions or activities would qualify for diversification support and will there be sustainability requirements/safeguards? What nature and of what level will the financial support be? What else is included in the support package to farmers wishing to diversify?

The limitation of mandatory diversification support to areas already affected by a nitrate-surplus should be lifted. Many more areas across Europe are currently at risk of a nitrate surplus and one should consider that overall nitrate leakage from European agriculture eventually accumulates in our waterways and finds its way into our oceans, where it contributes to progressive eutrophication<sup>4</sup>. The EU as a whole, and almost all Member States taken separately, urgently need to diversify and rebalance their agricultural production. This can be done by significantly increasing the production of crops and notably protein crops, especially crops intended for direct human consumption.

We would like to stress that adequate support from advisory services (Article 20 - CAP) will be of crucial importance to successfully accompany diversification initiatives by farmers, starting with diversification checks for interested farmers. Such diversification checks could be similar to organic conversion checks, which are offered free of charge for farmers in many Member States.



Public advisory services or certified private entities could help interested farmers assess feasibility, duration and cost of potential changes in production, as well as assist in identifying other factors relevant for successful production shifts, notably the vicinity of necessary processing facilities and, very importantly, market demand.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Lift the limitation of mandatory diversification support to areas already affected by a nitrate-surplus or at least include areas at risk of a nitrate-surplus.
- Include sustainability requirements regarding the type and manner of production.
- Ensure adequate knowledge and support from advisory services, including diversification consultations free of charge for farmers.

## **3.2. MULTI-ANNUAL TRANSITION SUPPORT**

Another new concept in the CAP proposals, under the above-mentioned agri-environmental and climate actions, is the idea of transition help for farmers. Farmers wishing to transition their farm or part of their activities 'towards more resilient production systems' would be able to draw up a transition plan and apply for multi-annual support.

The new transition provision, which could be considered as partially replacing multi-annual commitments under the current CAP's rural development pillar, recognises the need for more than just punctual or even short-term support schemes and the importance of holistically supporting farmers in their individual transition pathways to more sustainable and resilient farming models.

Unfortunately, the Commission proposal does not go into more detail on what such transition support could look like concretely and there seems to be no additional or specific funding foreseen<sup>5</sup> for this yet so important tool in the agri-environmental toolbox of the next CAP. Hopefully the upcoming negotiations on the CAP will develop this interesting idea, add clarification as to the conditions and modalities of the support and foresee dedicated funding.

As already mentioned above under the point of diversification support, an important aspect to consider for successful transition or diversification initiatives, is that farmers wishing to transition to other production models should be able to rely on robust advisory services, knowledgeable on the feasibility, timeline, cost and market perspectives for envisioned transition efforts<sup>6</sup>.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Add clarification regarding the access conditions and modalities of transition help.
- Ensure transition help schemes provide sufficient support to cover transition costs and reward farmers for delivered environmental and climate benefits.
- Ensure farm advisory services are able to assist farmers in determining feasibility, timeline, cost and market perspectives for their transition plan.
- Foresee dedicated funding for transition help schemes.

### 3.3. INVESTMENT SUPPORT

Diversifying one's agricultural production by including the production of various crops or shifting to plant production altogether can require significant investments. In order to help de-risk diversification initiatives for farmers, who are often already indebted from previous investments, the CAP needs to provide predictable and generous investment support schemes.

Article 71 of the NRP proposal and Article 13 of the proposed CAP regulation set the framework and conditions for investment support Member States can grant. Article 71, paragraph 18 sets the limit per farm at €300.000<sup>7</sup>. While under the current CAP investments, investments are linked to one or more of the CAP's objectives, the new proposal simply states in the article itself that Member States shall grant support for investments 'making an appropriate overall contribution to resilience of agriculture, food systems, forestry and rural areas, in particular climate and water resilience'.

We call on the co-legislators to recognize that investments for diversification of agricultural production and shifts to plant production fulfill this criterion inherently and we hope that farmers wishing to venture into sustainable crop production will receive prioritised access to investment support.

#### PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP

- Recognize diversification investments as a priority area to support for a resilient EU agriculture and food system.
- Include sustainability safeguards as to the type and manner of production.

### 3.4. MORE COUPLED INCOME SUPPORT FOR PROTEIN CROPS

Through coupled income support (CIS), Member States can support specific productions, in the form of an annual payment per eligible hectare or per animal. EVU has long been calling for a rebalancing of coupled income support, which has traditionally been skewed in favour of livestock production (70% for livestock, 14% for protein crops, 5% for fruit and vegetables<sup>8</sup>). Coupled income support can and should be used to help farmers looking to diversify their income, notably through the production of traditional food crops such as beans, lentils, peas, fava beans and chickpeas.

For the next CAP, the Commission proposes to raise the budget limit for coupled income support to an astounding 20%<sup>9</sup> (versus the current 13% limit<sup>10</sup>) of total direct payments to farmers, with an additional 5% for protein crops (currently a 2% extension). This would mean raising coupled income support from 13-15% to 20-25% percent, with a clear incentive to prioritize protein crops and, interestingly, farms combining the production of crops and livestock (Article 35 Paragraph 5 - NRP<sup>11</sup>).

It is important to note that coupled income support is currently a voluntary tool for Member States - the Strategic Plans Regulation for the CAP 2023-2027 foresees that Member States may grant coupled support. In the proposal for the CAP 2028-2024 the may has been replaced with a shall. It remains to be seen what the European Parliament and Member States will make of this proposal, as several Member States have made little to no use of coupled income support in the

past and might object to the introduction of a new mandatory intervention, especially of this budgetary magnitude. Negotiations on this aspect will have to be followed closely. Our hope is that the notion of a rebalancing of CIS in favour of plant productions and specifically increased support for protein crops will survive the negotiations.

It is important to keep in mind that environmental organisations have consistently criticized the indiscriminate use of coupled income support, detached from any sustainability requirements<sup>12</sup>. In their opinion, Member States should have to justify coupled income support from a sustainability perspective and prioritise specific crops with a smaller environmental footprint<sup>13</sup>.

The Commission proposal for the next CAP does include a provision whereby funding for livestock has to take into account environmental impacts, which includes setting a maximum livestock density in nitrate vulnerable zones. We agree that this condition as currently formulated is rather weak – why provide any extra financial incentives for livestock production in areas already affected by nitrate areas – and would welcome clearer sustainability criteria for coupled income support in general and more specific conditions guiding coupled support towards crops and protein crops in particular.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Allow for some Member State downward flexibility regarding the use of CIS, with no or lower mandatory CIS share.
- Rebalance coupled income support (CIS) through increased support for protein crops and other plant productions.
- Introduce minimum sustainability criteria for all CIS, notably linked to land capacity.

### **3.5. CREATION OF A PROTEIN SECTOR**

One of EVU's key recommendations prior to the publication of the CAP proposals was the creation of a protein sector. Unsurprisingly, we thus welcome the proposed creation of said sector under Article 159 of the Common Market Organisation (CMO) Regulation<sup>14</sup>.

More than a symbolic recognition of the strategic importance of the protein crop sector for the EU, the creation of such a sector under the CMO would entail very concrete and practical steps in the development of solid and mature value chains for protein crops. The creation of a protein sector means Member States will have to recognise protein crop producer organisations and offer sectoral interventions for the sector.

Recognised producer organisations can collaborate at farming, processing and marketing level<sup>15</sup>. They can optimize production costs, collectively place products on the market and negotiate better contracts and prices for their supply. In addition, producer organisations can receive direct support for start-up costs, technical assistance and collective investments. As regards protein crops and specifically leguminous crops for direct human consumption, the creation of a protein sector could thus potentially allow for much-needed collective and publicly supported investments in the development of value chains, starting with harvesting and processing equipment for new or re-discovered crops (quinoa, fava, lentils, chickpeas...)<sup>16</sup>.

The creation of a protein sector and thus the mandatory recognition of producer organisations in the protein sector unlock a further set of support schemes: producer organisations can benefit from targeted sectoral interventions, in the context of multi-year 'operational programmes'.

Operational programmes can include measures such as planning production and optimising production costs, concentrating supply and placing products on the market, improving product quality, promoting environmental sustainability and climate-friendly practices, as well as crisis prevention and management. It is currently already mandatory for Member States to offer sectoral interventions in the fruit and vegetable sector, but with the creation of a protein sector, the same would apply for protein crops in the future.

Through the CMO, the CAP provides financial support for the implementation of operational programmes. The EU funds a big portion (up to 50% of the total cost, and up to 100% in certain cases, like market withdrawal programmes for free distribution), and the producer organisation and its members contribute the rest. By supporting producer organisations in the protein sector, the CAP would no longer just subsidise protein production in an isolated way, but would actively help to build whole value chains. This is particularly important for food products based on protein crops, as they often require more sophisticated value chains than protein crops used for feed.

Lastly, one should highlight that creating a protein sector also introduces the possibility of marketing standards for protein crops and would facilitate the access to promotion schemes for protein crop producers. As regards marketing standards, the Commission proposes to introduce country of origin labelling for protein crops, to better inform consumers. We welcome this proposal for more transparency, as we believe it will help European consumers prioritise produce from EU farmers, when given the choice.

However, we also believe that sustainability should be a consideration when it comes to more transparency specifically and supporting the development of the protein sector in general. Environmental organisations have rightly stressed that, in seeking to increase protein crop production in the EU, the emphasis should be on crops that make a positive environmental as well as economic contribution<sup>17</sup>.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Endorse the creation of a protein sector under the Common Market Organisation Regulation (CMO).
- Ensure rapid recognition of and support to producer organisations at Member State level.
- Facilitate access of protein crops for direct human consumption to EU promotion policy.
- Endorse and implement country of origin labelling for protein crops.

## **3.6. SUPPORT FOR YOUNG FARMERS**

The issue of generational renewal in the agricultural sector has been identified by the Commission as one of the priorities for the next CAP to address and figured prominently in the Vision for Agriculture and Food<sup>18</sup>.

Under the new CAP, Member States would have to set up a national generation renewal strategy and provide a series of schemes and special conditions for young farmers<sup>19</sup>. In addition to the Commission's proposal to prioritize young farmers for the redistribution of payments after capping and degressivity of payments, Article 14 of the proposed CAP regulation notably foresees a specific support scheme for young farmers, rural business start-ups and the development of small farms.

Under this provision, Member States can grant support to up to 300.000 € per holding. Member States will have to set conditions for the submission and the content of a business plan which

(potential) young farmers must provide in order to receive support and support can be differentiated in accordance with objective and non-discriminatory criteria. In addition, under the young farmer starter pack (Article 16 - CAP), the Commission regrouped a list of other support tools and funding opportunities, for which young farmers could get priority support to.

This part of the Commission proposal, motivated by the urgent need to tackle the generation renewal crisis the European farming community is facing, is to be welcomed. In the context of support to young farmers, we hope that the co-legislators will recognise and explicitly acknowledge the potential and attractiveness of the plant-based foods sector for young farmers and new entrants and that enterprises in this area will be given special attention.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Explicitly acknowledge the attractiveness of the plant-based foods sector for young farmers and new entrants.
- Include sustainability criteria for Article 14 support scheme for young farmers.
- Ensure advisory services and agricultural schools are able to provide young farmers and new entrants with information regarding diversification and the production of protein crops in particular.

### **3.7. CAPPING, DEGRESSIVITY AND REDISTRIBUTION OF PAYMENTS**

Funding inequalities within the CAP are a recurrent issue. Is it well known that about 20% of CAP beneficiaries receive 80% of all direct payments, a reality which contributes to injustices in Europe's agricultural system (land speculation, concentration and intensification of production) and disadvantages small and medium farmers in particular. Most recent numbers not only confirm that the often-cited 20/80 is still a reality, but also reveal that in some countries the top 1% of beneficiaries capture up to 40% (!) of all subsidies<sup>20</sup>.

We therefore support the Commission's proposal to cap direct payments (the Commission proposes a €100,000 limit) in addition to degressivity of payments and to increase the redistribution of payments, focussing notably on small farmers, young farmers and farmers in areas with national constraints (Article 6 - Degressive area-based income support). We particularly welcome the mention of 'farmers combining the production of crops and livestock' in the category of holdings to prioritize for redistribution. This provision provides an additional financial incentive for diversification at farm level and thereby has the potential to contribute to a diverse and resilient agricultural landscape.

In practice, it would be up to Member States to set up a differentiation of payments and groups of farmers to prioritize for redistribution. This could lead to slightly messy and unpredictable results in the different Member States, with the risk of creating an uneven playing field for farmers across EU borders. We hope that the negotiations on the next CAP will add some commonality at EU level to this part of the proposal and that the category of farmers combining livestock and crop production will be maintained. It is also up for discussion whether sustainability criteria should play a role in redistribution, which is currently not the case.

Lastly, one has to mention that this is not the first time that capping of direct payments has been

been proposed, either by the Commission or the European Parliament. In the context of past CAP reforms, a majority of Member States has strongly and successfully opposed any mandatory capping of payments. It remains to be seen whether the Council's position on this issue has changed and how the negotiations on capping and redistribution will go this time around.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Endorse the Commission's mandatory capping proposal as such.
- Maintain commonality of the CAP and level playing field for farmers across EU borders by defining capping, degressivity and main redistribution rules at EU level.
- Include sustainability criteria for calculating redistribution per beneficiary, particularly rewarding diversification efforts at farm level.

### **3.8. MID-TERM REVIEW OF THE NRP PLANS**

As is currently the case for the CAP and other separate policies to be grouped under the National and Regional Partnership Fund, the Commission proposes to foresee a mid-term review of the NRP Plans (Articles 24 & 25 – NRP)<sup>22</sup>. In a fast-paced world full of unpredictable developments, providing an opportunity to adjust national plans to take into account new challenges is a smart move<sup>23</sup>.

As regards agricultural production and diversification, a mid-term review would present an opportunity to assess how plant-based production has evolved, how value chains have developed across Europe and whether there is a need to readjust diversification policies and measures at EU and national level.

For a mid-term review to make sense, it will be important for Member States to include clear targets in their NRP plans and for the Commission to set clear review criteria ahead of the mid-term review. It has also been stressed that potential adjustments of national plans following the review should not significantly weaken environmental or climate elements<sup>24</sup>.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Set up a robust monitoring and reporting mechanism.
- Define clear review criteria to be used by the Commission, including on (protein) diversification.
- Foresee the adoption of clear and adequate targets by and for Member States, including on (protein) diversification.
- Add a clause on no environmental or climate backsliding in case of adjustments of national plans post-review.

# 4. PART II - ROOM FOR IMPROVEMENT

## NOTE TO THE READER:

While still of relevance, some of the points in part II are broader than diversification and increased plant (protein) production alone. To facilitate your reading of these points,, we have therefore highlighted the parts directly making the link to diversification and more support for plant production.

## 4.1. INTRODUCE A (PROTEIN) DIVERSIFICATION OBJECTIVE

EVU has previously advocated for the notion of protein diversification to be integrated into the CAP's strategic objectives, namely in relation to food security<sup>25</sup>. By increasing the production and consumption of plant proteins, the EU's food system will become more self-sufficient, on top of more sustainable.

In our earlier, pre-preposal publication, we had suggested including protein diversification as a specific objective for Member States to address in their CAP Strategic Plans, which would have meant making it a part of the performance reporting requirements.

With the proposed new structure of the CAP and the absorption of CAP Strategic Plans into NRP Plans, one has to look elsewhere for the objectives the Commission proposes to set and Member States will have to address in their planning and implementation of agricultural policy at national level.

Article 2 of the proposed CAP regulation for 2028 to 2034<sup>26</sup> sets the framework for the new steering mechanism and the CAP national recommendations the Commission intends to emit prior to Member States drafting their NRP plans. Although protein diversification is not explicitly mentioned as a factor which will be taken into consideration for the recommendations to Member States, one can argue that it has the potential to contribute to points a) to d).

### **Article 2 – CAP national recommendations and steering**

(...)

*The CAP national recommendations shall be based on the following:*

- (a) contribution to fair and sufficient income for farmers and their long-term competitiveness, including the farmers' position in the value chain;*
- (b) improvement of attractiveness of the profession and foster generational renewal;*
- (c) enhancing climate action, ecosystem services provision, circular solutions, the conservation of biodiversity and natural resources, sustainable farming and improve animal welfare;*



*(d) improving resilience, farmers' preparedness and ability to cope with crises and risks;*  
*(e) enhancing the access to knowledge and accelerate innovation and the digital transition for a thriving agri-food sector.*  
*(...)*

The proposed NRP Regulation holds further objectives applying to the next CAP, namely the general objectives of the NRP fund, under Article 2 of the NRP Regulation<sup>27</sup>. Here one can find a reference to part III, title III of the Treaty on the Functioning of the European Union (TFEU), which holds the original objectives of the CAP under Article 39<sup>28</sup>.

### **Article 2 – General objectives of the Fund**

*1. With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives:*

*(...)*

*c) to support the implementation of the CAP of the Union in accordance with Part Three, Title III of the TFEU;*

*(...)*

While (protein) diversification is not mentioned under Article 2 of the NRP or in the TFEU, it can be argued that it fits the overall aim of the NRP fund, as well the Treaty objectives of a) ensuring the rational development of agricultural production and the optimum utilisation of the factors of production, (b) ensuring a fair standard of living for the agricultural community (c) stabilising markets; (d) assuring the availability of supplies; (e) ensuring that supplies reach consumers at reasonable prices.

Lastly, under the new CAP steering mechanism, the Commission's national recommendations will have to identify "key challenges to be addressed by each Member State in their NRP Plan", on the basis of the CAP-relevant specific objectives set out in Article 3, point (d), of the NRP Regulation.

### **Article 3 – Specific objectives of the Fund**

*1. The general objectives referred to in Article 2 shall be pursued across all regions through the following specific objectives:*

*(...)*

*d) to sustain the quality of life in the Union by:*

*(I) supporting fairer and sufficient income for farmers and their long-term competitiveness, including the farmers' position in the value chain;*

*(II) contributing to long-term food security;*

*(III) improving the attractiveness and living standards, including access to healthcare, in rural areas and fair working conditions and fostering generational renewal; improving farmers' preparedness and ability to cope with crises and risks; enhancing the access to knowledge and innovation and accelerating the digital and green transition for a thriving agri-food sector;)*

*paragraph text*



(...)

(V) enhancing sustainable agriculture and forestry management practices to promote resilient climate action, provision of multiple ecosystem services, supporting efficient water management, quality and resilience, the implementation of nature-based solutions, strengthening sustainable development, environmental protection, enhancing the conservation and restoration of biodiversity, soil and natural resources, and improving animal welfare.

We welcome the inclusion of food security under the CAP-relevant specific objectives of the NRP fund, which was one of our recommendations ahead of the proposals for the next CAP. We would furthermore recommend the explicit acknowledgment of the role (protein) diversification plays in securing a stable and safe food supply for all Europeans.

#### PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP

- Add wording on protein diversification to the proposed Specific objectives of the NRPF, for example in subpoint II) – contributing to long-term food security – under Article 3, paragraph 1, point d).
- Include protein diversification as a factor in the Commission recommendations to Member States.
- Include protein diversification as a criterion for the monitoring and evaluation of national plans and the CAP overall, particularly for the proposed mid-term review.

## 4.2. ENSURE ADEQUATE LEVEL OF ENVIRONMENTAL AND CLIMATE AMBITION

Diversification, done the right way, is one of the key levers to activate for a more sustainable agricultural system. Several measures under the current and previous programming periods of the CAP already tentatively supported on-farm diversification, notably through targeted support for growing protein crops and the brief introduction of crop rotation as a standard to follow. In the proposals for the next CAP, we would have liked to see more environmental ambition overall and specifically more diversification-related environmental standards and measures and funding dedicated to helping farmers put them in practice. Unfortunately, the verdict on the environmental and climate ambition of the proposals is a negative one, leaving the power of correcting it to the co-legislators, and ultimately, most likely, to the Member States in their implementation of the CAP at national level.

Even ahead of the publication of the proposals for the CAP revision, there were concerns as to a potentially reduced environmental and climate ambition for the next CAP, compared to the current programming period. In the current era of simplification and the postponement and backtracking on several initiatives adopted or announced in the context of the EU Green Deal (launched in 2019), these fears were, in our opinion, not unfounded.

After the adoption of the current CAP and in a context of an energy crisis and farmers' protests, the previous Commission already proposed several modifications of environmental and climate provisions, proposals which were whisked through by the European Parliament and Member States. Some observers particularly regretted the 'dismantling' of the newly introduced enhanced conditionality<sup>29</sup>, which contained new GAECs (Good Agricultural and Environmental

Conditions) as part of the standards beneficiaries have to apply in exchange for receiving direct payments. Temporary exemptions were introduced (some of which seem to have become permanent) and Member States were granted flexibility regarding the implementation of certain requirements<sup>30</sup>.

Under the new Commission, the so-called simplification agenda was seemingly fully embraced and further modifications to the CAP were proposed, adopted and implemented in record time. These changes notably include fewer on-farm checks, further exemptions for small farmers and fewer reporting obligations for Member States<sup>31</sup>. It remains to be seen to what extent the 'new' delivery model of the CAP, originally presented as centred on performance and delivering real results for farmers and the environment alike, will make good on its promises.

Given these recent developments regarding agricultural policy, there were thus understandably a lot of expectations and perhaps apprehension as regards the environmental and climate ambition of the proposals for the CAP 2028-2034.

### **Environmental ring-fencing**

One important difference between the current CAP and the proposals on the table jumps out at the astute observer: the absence of environmental ring-fencing. Under the current CAP, 25% of Pillar I (direct payments) had to be dedicated to eco-schemes and in Pillar II, 35% of expenditure was ringfenced for agri-environment-climate measures and green investments (and 50% of spending for natural and other area-specific constraints). The proposals for the CAP 2028-2034 completely remove the environmental ring-fencing component<sup>32</sup>. This means Member States would be able to freely decide the level of national expenditure on environmental measures. Theoretically, significant decreases in environmental spending would be possible, with no possibility for the Commission to intervene<sup>33</sup> (at least not in the context of the CAP). We therefore support the reintroduction of ring-fencing for environmental spending, for example under Article 35 of the NRP Proposal<sup>34</sup>.

### **Co-financing of environmental schemes**

Another important aspect to consider is the level of EU financing which environmental and climate schemes will qualify for under the next CAP. Under the current CAP, agri-environment-climate measures under Pillar II are co-financed by the CAP and national budgets (minimum 20%), while eco-schemes (Pillar I) qualify for full EU financing, with no national co-funding required.

The new proposals remove eco-schemes as a standalone measure and merge them with agri-environment-climate measures, meaning that future schemes of this type would need co-financing under the proposed agri-environmental and climate actions (Article 10 – CAP). In the NRP proposal (Article 35), the Commission proposes a minimum national contribution of 30%<sup>35</sup>. Consequently, if Member States wished to retain a similar range and scale of schemes to those in their existing CAP Strategic Plans, they would face higher financial obligations. This could make them less inclined to allocate funds to such schemes and more likely to favour measures that still receive 100% EU funding, potentially reducing the relative level of spending on agri-environmental and climate actions<sup>36</sup>.

### **Conditionality versus 'farm stewardship'**

One of the key elements of the CAP regarding its potential contribution to environmental and climate targets is the conditionality of payments: which rules and minimum standards do beneficiaries have to comply with in order to qualify for support from the CAP. Called cross-compliance until the last CAP revision, currently conditionality, this set of norms would be rebaptized 'farm stewardship' (Article 3 & Annex I – CAP).

Farm stewardship rules would be composed of Statutory Management Requirements (legal obligations farm holders have to comply with independently of agricultural subsidies) and 'protective practices'. The latter would replace the aforementioned GAECs<sup>37</sup>, are phrased rather vaguely<sup>38</sup>, with the details to be filled out by Member States at national level. Environmental observers have qualified the new conditionality set-up as "less demanding in environmental terms" and called for a re-strengthening of requirements, to provide a solid "sustainability baseline underpinning CAP support"<sup>39</sup>.

### Support for compliance with mandatory practices

The Commission furthermore proposes that Member States be allowed to support farmers for the implementation of these protective practices. Under the current CAP, compliance with mandatory rules is the baseline and additional financial support is only granted for the voluntary participation in eco-schemes and AECMs.

While it might be appropriate to financially support farmers for the putting in place of protective practices, the level of flexibility given to Member States for the defining of the protective practices themselves and the level of support carries considerable risks for the coherence of the CAP as a European policy. A) Potentially vastly different national sets of protective practices and levels of support could significantly distort competition for farmers, with diverging impacts on the environment and climate on top. B) The more funding will be allocated to helping compliance with protective practices, the less will be available for more ambitious voluntary schemes (including diversification measures).

### Crop rotation

From a diversification perspective, we particularly regret the proposed disappearance of GAEC 7 on crop rotation, which was unfortunately already hollowed out shortly after the entry into force of current CAP. An EU-wide implementation of this standard could have naturally led to an increase in the cultivation of more (and more diverse) protein-rich plants, binding nitrogen and replenishing soils<sup>40</sup>, while providing new income opportunities for farmers.

When it comes to contributing to soil health in the EU, recent studies confirm that crop rotation and diversification account for the vast majority (77%) of the estimated increase in soil organic carbon under the current CAP. They also significantly significantly to increases in soil nitrogen (28%) and soil water retention capacity (39%)<sup>41</sup>. We therefore particularly advocate for crop rotation to be included under the new 'farm stewardship' as a mandatory practice.

To maximize the economic potential for farmers, it should also be ensured that, where possible, protein crops suitable for direct human consumption cultivated in the context of crop rotation are fully utilised, by entering the food chain rather than being used solely as cover crops.

#### PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP

- Ringfence environmental spending, not going below the current CAP's ambition
- Maintain 100% EU-funding for agri-environmental and climate measures under direct income support
- Maintain Pillar II agri-environmental and climate measures, with sufficient and ringfenced funding
- Sufficiently define conditionality/farm stewardship rules at EU level to ensure adequate environmental ambition and level playing field for farmers
- Reestablish crop rotation as one of the key practices to implement at farm level

## 4.3. ADDRESS OVERALL BUDGETARY UNCERTAINTY

Why does the overall budget of the CAP matter for diversification and more plant production? Farmers will not risk undertaking diversification initiatives on their farm when faced with major uncertainty around the financial support they might receive in the coming years.

It is therefore of importance to us that, following the publication of the Commission proposals on the MFF, the NRPF and the CAP in July 2025, the size of the budget dedicated to agriculture quickly became one of loudest and most often repeated points of critique.

Two numbers in particular started circulating: €387 billion – the allocated CAP budget for the current programming period – versus €300 billion (+ €6.3 billion for a Unity Safety Net in case of market disturbances) – the amount the Commission proposed to ringfence within the NRPF for agricultural spending. At first glance, these numbers suggest a considerable downsizing of the CAP's budget, especially when taking into consideration the high inflation rates Europe has experienced over the past couple of years. An already financially struggling farming sector understandably quickly voiced its concern over the perceived budget cut.

However, as a result of these concerns, the Commission redoubled efforts to better explain the new budgetary structure<sup>42</sup>. Member States and stakeholders gained more clarity and many recognized that there might not necessarily be less budget available for the CAP; contrarily, the budget may be larger than for the current one<sup>43</sup>. Yet the Commission proposals introduce a lot of budgetary flexibility which breeds continued uncertainty.

In short: Within the NRP proposal, the Commission proposes to ringfence ~ €300 billion specifically for income support, which includes area-based direct payments, agri-environmental measures and investment support. In addition, Member States are free to allocate or redirect additional funding to the agricultural sector within their NRP plan (another €453 billion in total). The additional funding can be used to finance CAP measures which fall outside of the ring-fenced interventions, such as LEADER, innovation and knowledge sharing projects or school schemes. In theory, Member States are also free to use some of that funding to complement the ring-fenced €300 billion, meaning redirecting EU resources from other parts of their MFF envelopes to income support under the CAP<sup>44</sup>.

Within the proposed new NRPF budgetary structure, it would thus ultimately be up to Member States to decide exactly how much they want to allocate to agricultural spending at national level. This means that there isn't necessarily less funding for agriculture overall – the Commission just added a considerable dose of national budgetary flexibility and therefore uncertainty at farm level.

The new mega fund structure and the limited ring-fencing for agricultural spending also caused irritation and concern amongst policymakers: several political groups in the European Parliament openly criticized<sup>45</sup> the proposed new structure and insisted on the need to secure sufficient funding for the CAP and rural development in particular. Seemingly in an effort to appease the Parliament<sup>46</sup> the Commission then informally proposed adding a "rural target" to the NRP, which would dedicate 10% of unallocated funds (which would equal roughly €49 billion) to the development of rural areas<sup>47</sup>. It remains to be seen what exactly would be included in this rural target, how it could effectively be monitored<sup>48</sup> and whether this proposed adjustment will be sufficient to appease sceptical policymakers, regional authorities, rural communities and farmers alike.

In January 2026, in the context of farmers' concerns around the Mercosur deal, the Commission President promised an additional 45€ billion for European farmers as of 2028<sup>49</sup>. It is important to underline that this is not 'new' money – the NRPF envelope remains the same – and that the use of these funds will again depend on Member States. The Commission merely proposed *“to reshuffle funds that were not immediately available under the initial 2028-34 budget”*<sup>50</sup>

*proposal”*, allowing Member States to request access to up to two thirds of the flexibility reserve initially foreseen to be frozen until the mid-term review of the NRP. It is equally essential to stress that there are no requirements set regarding the types of CAP interventions that Member States could support with this 'frontloaded' extra funding; hopes that there could be some ringfencing for rural<sup>51</sup> development and even agri-environment-climate actions unfortunately seem unrealistic .

To ensure that farmers and rural areas will not receive less funding than under the current programming period of the CAP, the most straightforward move would be to formally ringfence an additional amount within the NRPF, corresponding to the €87,4 billion (+ €8.1 billion from the next generation EU post-covid recovery instrument)<sup>52</sup> allocated to the current European Agricultural Fund for Rural Development (EAFRD), the second pillar of the CAP.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Alleviate budgetary uncertainty by ringfencing an additional amount for agriculture within the NRPF, corresponding to – at least – the amount allocated to the current European Agricultural Fund for Rural Development (EAFRD).
- Allocate sufficient budgetary envelope to rural development (about double the 45€ billion proposed by the Commission for the 'rural target').

## **4.4. AVOID MERGING OF THE CAP'S TWO PILLARS**

Another major point of criticism which has emerged even since before the official publication of the proposals<sup>53</sup> concerns the so-called pillars of the Common Agricultural Policy, or rather, the Commission's proposal to abolish the historically well established dual structure of the CAP.

Pillar I, the core budget of the CAP, traditionally covers direct payments to farmers and market measures. Pillar II, the above-mentioned European Agricultural Fund for Rural Development (EAFRD), also currently includes support schemes for farmers (including certain environmental commitments and investment measures), but goes beyond the farm level, with programmes such as LEADER, which can benefit entire rural communities.

In the Commission's July proposals, not only has the CAP been absorbed into the new NRPF, but within the CAP itself, the two pillar-structure has vanished. One could argue that the 300 billion ring-fenced for “income support” would more or less replace the current Pillar I, but Pillar II has, budget-wise, melted into the larger NRPF.

An important distinction between the two pillars of the CAP has been their different temporalities: in general, pillar I interventions are planned on a yearly basis, while pillar II programmes finance multi-year measures. It is therefore not surprising that the second pillar has therefore traditionally been the one providing (longer-term) support for farmers wishing to explore sustainable new ways of farming and/or diversifying their activities. Losing the

predictability and stability that come with multi-year interventions could be a major disincentive for farmers wishing to try out new methods or shift their activities to new productions, such as protein crops for direct human consumption.

On the Member States' side, the financial disincentive to set up generous rural development interventions seems to be even clearer: interventions falling outside of ring-fenced "income support"-package would still be able to receive NRP funding, but Member States would have to make the conscious decision to allocate part of their NRP share to them. This would mean interventions currently under Pillar II would be in direct competition with other policies and measures. The extent to which these interventions are funded (some remain compulsory, but without ringfenced budgets) would be at the discretion of the national or regional authorities<sup>54</sup>.

Given these elements, we criticize the proposed disappearance of Pillar II and warn of a possible negative impact on sustainability and diversification efforts at national, regional and ultimately at farm level. We would therefore advocate for the maintenance of a specific second rural development fund, with an appropriate, ringfenced budget.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Maintain the two pillar-structure within the CAP.
- Foresee and ringfence a dedicated and adequate budget for the rural development pillar.
- For more stability and predictability at farm level and independently of the final structure of the CAP, keep offering multi-year measures to farmers.

## **4.5. SAY NO TO MORE FLEXIBILITY AND LESS COMMONALITY**

"Where is the 'common' in the proposal for the new Common Agricultural Policy?" Questions such as these made the rounds in the EU policy sphere following the publication and are one of the main points of criticism emanating from the European Parliament<sup>55</sup>.

Across almost the entire political spectrum (perhaps not including nationalist groupings), the new CAP proposals are seen as a potential further renationalisation of one of the EU's oldest policies. The term 'further renationalisation' is specified because that was already a point of concern when the last CAP revision proposals were published in 2018<sup>56</sup>.

With the introduction of a new delivery model for the current CAP, Member States got to set up national CAP Strategic Plans, where they already had quite some leeway in deciding which objectives to pursue with their agricultural policies and which interventions to implement or even design (for example eco-schemes, where Member States were free to set up their own voluntary support schemes for farmers).

The new proposals can be seen as a continuation of a renationalisation process already set in motion by the previous CAP revision due to several aspects, including more budget autonomy and more flexibility regarding the setting up and implementation of support schemes.

One could argue that the new NRP and CAP proposals take the renationalisation philosophy to the next level by adding budget flexibility for a significant part of agricultural spending. This is done by the ringfencing of an amount inferior to the current budget total of the CAP and giving



each Member State the freedom (and responsibility) to decide the level of additional funds to allocate to agriculture and rural development from the big NRPF pot. The extra budgetary flexibility also comes with less accountability: governments will be able to reshuffle funds more freely within their national budgets, making EU scrutiny on the correct use of EU funds more difficult.

The potential negative effects of this new budgetary flexibility could ultimately be felt by the farmers themselves. Member States and, as a consequence, farmers from different Member States, could end up with vastly different agricultural budgets, creating potential market distortion and unfair competition.

In order to ensure an even playing field for farmers across the EU, it is not just the size of the overall agricultural budget per Member State that counts, the details of the design and implementation of agricultural policy should also be considered. When it comes to the distribution of CAP funds themselves, the new proposals leave several important questions to be asked (and answered) entirely or partially at Member State-level. Here a few notable examples:

- Which types of voluntary schemes will be made available to farmers (including measures to support diversification)?
- How well will these schemes (notably agri-environmental & climate actions) be funded?
- What criteria will be used for the redistribution of funds (after capping)?
- What criteria will be set up for investment support?
- What will support schemes for young farmers look like?
- Which sectors will the proposed 20–25% of coupled income support flow to?
- Which protective practices will farmers eventually have to comply with under the new ‘farm stewardship’ model and how much support will they receive for compliance with these rules?

The latter point is particularly concerning for the common nature of the CAP and fair competition between farmers, as the Commission proposal grants additional flexibility to Member States regarding the conditionality of payments, i.e. the environmental and animal welfare standards farmers have to comply with in order to qualify CAP support (more on this aspect under point 5. on the environmental ambition of the new CAP proposals). On top of statutory management practices, Member States can define their own ‘protective practices’ farmers have to comply with. Additionally, they can decide whether to compensate farmers for these – mandatory – practices or not.

In the spirit of creating an even playing field for farmers across the EU and ensuring fair competition, negotiations on the next CAP should reintroduce more commonality into the draft as proposed by the Commission, both in terms of the budgetary framework and regarding the design of the interventions and conditionality of payments. From our perspective, we of course hope to see more support for diversification initiatives and the development of plant-based production chains as one of the key common elements of the next CAP.

#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

Ensure a level playing field and fair competition for farmers by adopting:

- A robust and detailed budgetary framework.
- Common rules on conditionality of payments (‘farm stewardship’).
- Strong EU guidelines for redistribution of payments, voluntary schemes and investment support (including as regards support for diversification efforts).
- More support for diversification of agricultural production as a common thread.

## 4.6. FORESEE AN ADEQUATE TIMEFRAME FOR REVISION AND IMPLEMENTATION

The 2023–2027 CAP reform introduced a new delivery model, whereby Member States had to develop national CAP Strategic Plans, which the Commission then evaluated before approving them at a later stage. Under the proposed new steering mechanism, the first step will be undertaken by the Commission instead, who will have to develop 27 sets of recommendations to Member States ahead of the drafting of their NRP plans.

While this reversal of roles is not inherently negative, it has to be pointed out that it adds further pressure as regards the timing of the negotiations, the approval process and the start of the next programming period. The next CAP is supposed to start in 2028. The NRP and CAP proposals were published in July 2025 and negotiations have yet to properly start.

Especially given the initial reluctance of Council and Parliament regarding the Commission's proposals, it will realistically take years of intense negotiations on the EU budget, the NRP Regulation and the CAP Regulation before the framework for the next CAP is sufficiently set for the Commission to be able to start drafting recommendations to Member States. Then it will take Member States another substantial amount of time to set up their NRP plans, including the parts on agricultural policy.

As a point of reference, for the current CAP, which was supposed to start in 2021, the proposals were published in June of 2018 and the reform finalized at the end of 2021. Already for the current CAP, there was a lot of criticism regarding the lack of time for proper assessments and potential adjustments of CAP Strategic Plans<sup>57</sup>.

Environmental organisations have stressed that the approval and subsequent monitoring processes for the NRPPs need to be sufficiently robust to ensure 'that all objectives are given due attention, that avoidable conflicts and trade-offs between objectives do not arise and that sufficient attention is applied to addressing environment and climate needs'<sup>58</sup>.

To ensure coherence in the preparation and evaluation of the national CAP plans and their implementation, we advocate for categoric involvement of all relevant ministries at national level and DGs at EU Commission level (particularly DG Environment and DG Clima).

Given the novelty of the NRP fund structure and the substantial changes to the CAP regulation, it is wise to assume that even once the proposals have been amended and adopted, both Commission and Member States will need additional time to properly set up recommendations and national plans respectively. With the existing time constraints – the next CAP is supposed to start in 2028 – the process is likely to end up being somewhat hasty, with a risk of laxism and incoherent results.

We call for an adequate timeframe for each step of the revision, adoption and implementation process: Rather do things well and a bit slower than rushed and incoherently. To allow for the correction of national plans perhaps approved too hastily, it is important to foresee the possibility of adjustments of the plans over the course of the programming period, notably at the time of the mid-term review proposed by the Commission. This would also present a good opportunity to assess whether diversification has been given enough attention in the national plans and whether the planned interventions are showing the desired effects on the ground.



#### **PRIORITIES FOR THE NEGOTIATION & IMPLEMENTATION OF THE NEXT CAP**

- Foresee an adequate timeframe for each step of the revision, adoption and implementation process.
- Ensure meaningful involvement of all relevant ministries at national level and DGs at EU Commission level.
- Foresee the possibility of adjustments of the plans over the course of the programming period (with a clause on no environmental backsliding), including in regards to the objective of protein diversification.

# 5. CONCLUSION

The European Commission's proposals for the CAP 2028–2034 open up a number of promising avenues to support agricultural diversification and the development of plant-based and protein crop production in Europe. Amongst these avenues are the newly proposed diversification and transition schemes, increased coupled income support for protein crops and the long-awaited creation of a protein sector under the Common Market Organisation. If designed and implemented well, these elements could help de-risk production shifts, strengthen value chains, improve farm resilience and meaningfully contribute to food security, environmental sustainability and generational renewal.

However, as currently drafted, the proposals risk falling short of these ambitions. The weakening of environmental ambition, the absence of EU-level objectives on diversification, the erosion of the CAP's common framework and the increased degree of budgetary uncertainty threaten to weaken the policy's impact and coherence. Without clear EU-level objectives, safeguards and adequate ring-fencing, diversification efforts and support for plant production will likely remain unevenly implemented and overall insufficient, precisely at a time when Europe urgently needs to rebalance its agricultural production. This would create distortions in competition and reduce predictability for farmers considering long-term investments in on-farm diversification.

The upcoming negotiations therefore represent a critical moment. Co-legislators have the opportunity to strengthen the proposals by embedding protein diversification more clearly into the CAP's objectives, supporting and further developing the Commission's proposals on diversification and transition support, restoring overall environmental ambition, ensuring sufficient and stable funding, and re-establishing common rules that guarantee a level playing field across the EU.

We also call on the co-legislators and particularly the Member States to support the proposed creation of a protein sector and recognition of producer organisation, a crucial step for the development of solid value chains for protein crops for human consumption made in Europe.

Once the EU-level framework for the CAP stands, the next step will be the inclusion and subsequent implementation of meaningful diversification measures at Member State level, through the different national plans. We call on the Commission to consider this important factor in the recommendations to Member States and hope to see strong national plans in support of agricultural diversification.

As a whole, the CAP 2028–2034 could send a strong signal: diversification and increased plant-based production are not just marginal add-ons, but central pillars of a resilient, competitive and future-proof European food system.

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## Contact

European Vegetarian Union (EVU) e.V.  
E-Mail: [info@euroveg.eu](mailto:info@euroveg.eu)  
Website: [www.euroveg.eu](http://www.euroveg.eu)

