

Acknowledgement

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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.

1. Introduction

Given its substantial financial impact, historically representing one third of the EU's total budget, the Common Agricultural Policy (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 European agriculture in line with climate and environmental protection, as stated in the Court of Auditors Special Report 16/2021. The economic benefits of past programming periods of the CAP are also called into question, with price uptakes by landowners and unequal distribution of funds based on farm sizes. Notably, 80% of CAP funding is attributed to the 20% biggest farms(1).

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

Current dietary imbalances are also a root cause of food insecurity in the EU. This has been acknowledged by the EU Drivers of Food Security(12), and European Food Security Crisis Preparedness and Response Mechanism(13). 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 feed(14) 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 an overall 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 instead (15). More plant-based diets have been shown to reduce land-use needs(16). Therefore, progressive shifts in **production and consumption 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 (17, 18). The potential of production and dietary shifts has been acknowledged by the European Commission (19), the IPCC (20) and has been recommended by the 2023 Science Advice for Policy by European Academies (21), the European Scientific Advisory Board on Climate Change (22) and the European Environmental Agency (23).

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

Increased production and consumption of plant-based foods hold significant economic potential for EU farmers, with data showing most farmers would benefit from dietary shifts with increased incomes(24). Diversification of production is a key tool to achieve resilient farms, ecosystems and business models, offering farmers new possibilities and stability in times of climate, environmental and geopolitical uncertainty. Developing plant-based food production and exploring innovative new markets could be particularly appealing to young farmers. This could contribute to tackling the generational renewal issue that the EU farming community, and the EU as a whole, is facing.

Increased support for European plant-based production, with a focus on organic and agroecological practices, is urgently needed.

For the purposes of CAP support, "plant-based foods" ranges from fruits, vegetables, root-vegetables, whole-grains, legumes, nuts, mushrooms, as well as developments and investment support for foods using these products as raw materials, such as tofu, tempeh and plant-based alternatives compatible with WHO guidelines on salt, sugar and fat content.

2. OVERARCHING PRINCIPLES

With this position, the EVU outlines how current CAP mechanisms could be potentiated to further support the production and consumption of plant-based foods. Although we support wider reforms and a broader vision of the CAP, as proposed by other organisations and agreed by the <u>Strategic Dialogue on Agriculture</u>, our main objective is to provide a simplified framework that can deliver on the goals of protein diversification and supporting plant-based foods whilst taking into account social, environmental and economic sustainability.

Nevertheless, it's important to highlight the following principles:

A PERFORMANCE-BASED CAP

With increasing limitations to the EU budget, it is essential to ensure the available budget delivers on several EU goals. The Vision for Agriculture and Food sets the objective for the agri-food sector to function within planetary boundaries and in line with the One Health approach. Thus, the next CAP should initiate the transition away from area-based payments, towards supporting the production of public goods. Disbursement of CAP funds must be aligned with a set of clear EU policy objectives, namely in the fields of employment, environment, climate, animal welfare, healthy food production, water and soil management and the overall adoption of good production methods such as organic, agroecological and agroforestry practices.

CAPPING AND REDISTRIBUTION

Data shows that 20% of the CAP beneficiaries receive 80% of the direct payments (25). This furthers inequality, incentivises land accumulation, speculation with land prices and intensive practices, leaving small and medium farmers behind. The Strategic Dialogue called for a deep reform of the CAP that targets socioeconomic support towards active farmers and land managers who need it the most. The Vision for Agriculture and Food also states that the CAP support should be further directed towards those farmers who need it most, with particular attention to the farmers in areas with natural constraints, young and new farmers, and mixed farms. Over two thirds of consumers have also stated that CAP should target small and medium farmers (26). Therefore, the next CAP should better target payments, including ambitious capping and redistribution rules.



GENERATIONAL RENEWAL

Only 11.9 % of EU farm managers were under the age of 40 years old in 2020, and almost a third of all farmers are over 65 years old(27).

This represents a severe risk for the future of the EU's agriculture sector and food production. It is therefore essential that the next CAP makes generational renewal a key priority, with increased support for small and medium young farmers. This support should take the form of increased funds, training, de-risking tools, land access policies, as well as incentivising Member-States to include their own generational renewal strategies in the National Strategy Plans (28).



RECIPROCITY IN TRADE

Ensuring that trade agreements and regulations are fair and balanced for European farmers and consumers is essential. Imported agricultural products must comply with the sanitary, social and environmental production standards in force at the EU level. The next CAP should support the implementation of strict controls to check compliance with EU rules, targets and standards in food trade.



A JUST TRANSITION

Consumer habits and demands are shifting. The climate crisis requires change and adaptation to new production methods as well as shifts in what we produce. Due to climate and supply chain constraints, agriculture is becoming more unpredictable. The next CAP must create the mechanisms necessary to ensure farmers can adapt and make a decent living producing healthy and sustainable foods. We stand with the Strategic Dialogue's recommendation for the development of a Just Transition Mechanism for farmers, with dedicated funding as well as the implementation of policies that de-risk production shifts and diversification, especially to support plant-based and protein crops production for food.

3. Supporting Plant-based Foods with the Common Agricultural Policy

3.1 CAP Objectives and Strategic Plans

The CAP 23-27 had 10 broad strategic objectives (29). 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 (CSPs) and therefore be part of 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 the production of plant-protein for food(30). Therefore, these recommendations could further support current and future plans of this kind.

Additionally, we call for 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.

3.2 Coupled Income Support

Coupled income support (CIS), holds great potential for driving agricultural production and consumption. However, its current application highly contributes to promoting unsustainable production and consumption patterns, namely the intensification of livestock production, which receives 70% of the total budget of CIS(31). 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 sector(32).

Although the use of CIS for protein crops specifically has improved in the CAP 23-27 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 - (33). 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(34).

We therefore consider CIS to be an underutilised 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 the 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.

3.3 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 significant improvements(35). While acknowledging the need for reduced bureaucracy for farmers, the EVU stands for maintaining these instruments in place as approved in the last CAP, standing against "simplification" practices that may hinder long-term sustainability, productivity and competitiveness.

The EVU highly recommends 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 even completely left out by 8 Member-States - AT, CY, MT, CZ, LU, PT, SI, SK -(36). Similarly, under the rural development pillar, AECC interventions on leguminous crops are not included by several Member-States(37). 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.

3.4 Sectoral support and investment support

Usually used for fruits and vegetables, wine and apiculture as mandatory interventions and hops and olive oil as optional, sectoral support, and the development of Producer Organisations (POs) can have a significant impact on 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 Regulation (38). 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), current CSPs lack specific support for leguminous crops farmers (39).

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 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 Producer Organisations in the leguminous crop sector.

Within structural investments and rural development, support to protein crops is available, 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).**

3.5 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 programming period, the level of coherence between the promotion policy and EU climate and environmental policies differs and depends on product types, production methods and markets(40). In fact, the EU may have spent almost 200 million euros incentivising already unbalanced dietary habits towards even more animal protein between 2014–2019(41).

In 2023 alone, the Commission planned to spend almost 200 million euros promoting agri-food products(42); however, only about 20 million were earmarked for fruits and vegetables(43). 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 of the promotion policy with the EU's health and sustainability targets, 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, thereby 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 organic foo

3.6 School Scheme

The EU school scheme supports the distribution of milk, fruit and vegetables to millions of children, from nurseries to secondary school, across the EU and it plays a vital role in shaping children's eating habits and awareness around food and health. However, the Scheme's current scope does not sufficiently reflect the diversity of nutritional needs among children, nor does it align with the EU's environmental and public health objectives. The current scheme, in place since 2017, provides fruit, vegetables, milk, and certain milk products to school children, alongside educational measures. Yet, despite its wide reach – covering millions of children annually – the product eligibility remains narrowly defined.

The current scope of the Scheme does not reflect the dietary diversity or sustainability goals the EU is striving to achieve. While it supports the distribution of milk, fruit and vegetables, it excludes fortified unsweetened plant-based milk alternatives - despite rising demand and the nutritional and environmental benefits these products offer.

Evidence shows that fortified unsweetened plant-based milk alternatives, such as those made from soy or pea, can match the nutritional profile of cow's milk(44) and offer the added benefit of a lower environmental footprint(45, 46). **Most of these products are also produced and sourced within the EU(47, 48), providing new income streams and opportunities for farmers.**

We call for the inclusion of fortified, unsweetened plant-based drinks such as soy and pea in the Scheme to ensure that all children, including those who are lactose intolerant, allergic, or who avoid animal products for ethical or environmental reasons, are equally supported. In the same way, this would support a level playing field for farmers producing soy/pea in the EU.

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