



Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With 200 member organisations active in 40 European countries, representing over 1,700 NGOs and more than 40 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.

24 October 2025

CAN Europe on AGRIFISH Council 27-28 October

Dear Agrifish ministers,

CAN Europe welcomes that the Danish EU presidency has put the discussion on the “Post-2027 CAP proposal on green architecture” on the agenda of the 27-28 October meeting.

The Common Agricultural Policy (CAP) is currently failing to support the just transition to sustainable food systems. As a cornerstone of EU agricultural policies to increase agricultural productivity, support farmers, and promote rural development, the CAP has a substantial budget and policy means to promote a just transition and to upscale climate and environmental objectives in agriculture, but it has been widely criticised for failing to do so. For example, a European Court of Auditors report on the CAP national strategic plans concluded that the plans do not match the EU's ambitions for the climate and the environment and that key elements for assessing green performance are missing.¹ A WWF analysis found that agriculture subsidies are often used in a way that damages the environment and provides little aid for farmers transitioning to sustainable methods.² European agriculture may also become the biggest source of greenhouse gas emissions in the period post-2030 if the transition fails to sufficiently factor in the need for developing with fewer emissions for the sector, including the potential implications of the intermediate **2040 climate target**, and its fair contribution on the EU's pathway to climate neutrality. Given the dominant role of **livestock** in the EU's greenhouse gas emissions, we also urge you to embed climate considerations in the work on the upcoming **livestock strategy**, which should address both the impacts of the sector within the EU, and its heavy dependence on the import of unsustainably produced feedstocks. Furthermore, improved climate resilience will be critical for all key elements of the sector to withstand the unfolding impacts of the climate crisis. We also see the need to halt harmful trade deals that undermine an agro-ecological transition to sustainable food systems and create unfair competition for small and medium-sized farmers like the EU-Mercosur Trade agreement.

It is clear that business as usual in the CAP is not an option, given the challenges of rising levels of climate change and extreme weather events, soil degradation, water pollution and scarcity, and biodiversity collapse, while there is a need to increase biodiversity protection and nature restoration. Millions of farmers are confronted with rising production costs and often low farmgate prices,, and exploitation from deep-set incumbents in agriculture and food systems. Cost increases for food in combination with quality of food and sustainability considerations are among the major concerns in the cost of living challenges millions of consumers face in the European continent and beyond.

¹ <https://www.eca.europa.eu/en/publications/SR-2024-20>

²

<https://www.wwf.eu/?13738891/Can-your-money-do-better-Member-States-spend-billions-of-EU-funds-on-activities-that-harm-nature>

Many of the above issues were recognised in the conclusions of the ‘Strategic Dialogue on the Future of EU Agriculture’, convened by President von der Leyen, but they are not adequately addressed by the Commission’s proposals.

With regard to the proposed changes and the CAP’s “green architecture” we would like to highlight the following aspects:

- **Sufficient and predictable funding** will be critical for farmers to pursue the transition to farming systems which are better equipped to face accelerating climate impacts and to producing with fewer emissions. The proposed overall cuts to the CAP and failure to earmark funds for climate and environment measures will make it more difficult for farmers to proactively apply them. We are even concerned that it might be understood by farmers as a signal that they are no longer seen as critical partners in addressing the climate crisis. Overall, the proposal represents a missed opportunity to redirect CAP funds towards climate and environmental action and to support farmers in the transition.
- It is essential to review the **rules and regulatory tools of the Common Market Organisation** (as part of the CAP) in order to ensure guaranteed fair prices. Amongst others, unfair trading practices must be addressed to ensure that farmers can receive decent revenues from the market and do not have to sell their products below production costs.
- Elements of the CAP which we regard as more regressive - **area-based payments and coupled support** - **have been ring-fenced and strengthened**, which could further squeeze the funding available for agri-environmental actions. This remains a concern even if some of the proposed changes, such as the capping and the degressivity of subsidies, would be a substantial improvement and reflect some of our main concerns.
- The **protecting safeguards** against harmful investments (including the exclusion list) and other harmful subsidies **remain rather weak**. That means CAP funds will likely continue to support environmentally damaging practices rather than enabling a just transition, which, amongst others, also runs against one of the key goals of the Paris Agreement (2.1c) for making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development.
- While the **increased flexibility for Member States** to set funding priorities may have some merit in terms of adapting to specific national and regional challenges, we are concerned that the common challenge of achieving the EU’s climate and environmental goals and standards may be deprioritised, and Member States may look for lowering standards under a competitiveness label, which undermines environmental quality for Europe’s people and may also create or exacerbate inequalities between farmers in different countries. With this increased flexibility potentially also comes a **reduced predictability and planning certainty** for farmers regarding the support they can expect for the transition. It is critical that the National and Regional Partnership Plans (NRRP) ensure consistency with Nature Restoration Plans (NRP) and National Energy and Climate Plans (NECPS) at the level of ambition that the EU’s goals require.
- Environmental and climate impacts of primarily intensive livestock production are significant in the EU. While we notice elements in the CAP proposals to make support available for **extensification of livestock production** through Agri-environmental climate Actions (AECAs), the proposed CAP adjustments fall short of the need for a strategy for the just transition to a more resilient and sustainable EU livestock sector

through a territorial approach (including quantitative, differentiated reductions of livestock in the context of wider sustainability considerations leading to an overall reduction of livestock numbers).

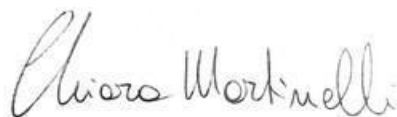
- In light of the July Agrifish Council call on the Commission to come forward with an EU protein strategy, we would like to highlight the need for developing an **EU Action Plan for Plant-based Foods by 2026** as a critical element to strengthen plant-based agri-food chains - from farmers to consumers.³
- We note that according to the current proposal, total EU CAP subsidies will be approximately 20% reduced starting in 2028 for the next seven years. If designed appropriately, carbon pricing mechanisms could deliver additional funding for farmers and climate action and therefore should be carefully explored (in a way that they do not undermine the integrity of existing carbon pricing mechanisms).

Overall, we urge you to work towards adjusting the CAP reform proposals with a priority on the following points:

- **Phasing out harmful subsidies**, including those that encourage the production and consumption of animal products and area-based direct payments, which are linked to the size of the farm rather than the sustainability of practices;
- **Reform income support to be more targeted to those farmers and communities most in need, especially in support of environmental and climate action;**
- **Pursue a dedicated funding mechanism to support the agri-food just transition.**

The European agriculture and food systems should move towards a comprehensive just agroecological transition while constructively contributing to achieving ambitious climate targets in a manner that is fair to farmers, rural communities, consumers and the public at large, and the next years are critical for setting the framework for progress.

Yours sincerely,



Chiara Martinelli, Director

³ We refer to a Blueprint for this EU Action plan supported by 130+ organisations and the need for a Plant-based Fund:

https://eeb.org/wp-content/uploads/2025/08/BEUC-X-2025-056_Blueprint_EU_Action_Plan_for_Plant-based_Foods.pdf