



ECVC Position paper on
the Post-2027 CAP
negotiations

TOWARDS FOOD SOVEREIGNTY AS A RESPONSE TO SYSTEMIC CRISES

Recommendations to the
Council and the European
Parliament



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Towards food sovereignty as a response to systemic crises

Recommendations to Council and European Parliament

This document sets out the position of the European Coordination Via Campesina (ECVC) regarding:

- **Proposal 2025/560 establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034;**
- **Proposal 2025/553 as regards the school fruit, vegetables and milk scheme ('EU school scheme'), sectoral interventions, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties, rules on the availability of supplies in time of emergencies and severe crisis and securities;**
- **Proposal 2025/565 establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034; and**
- **Proposal 2025/545 establishing a budget expenditure tracking and performance framework.**

In July 2025, the European Commission (EC) published its proposals for the 2028–2034 EU budget — the Multiannual Financial Framework (MFF) —, the Common Agricultural Policy (CAP) for the same period, and a revision of the Common Market Organisation (CMO).

ECVC rejects these proposals for the future MFF and CAP. They do not guide the necessary reform of two key policies for the European agricultural sector, but rather underline their dismantling under the guise of simplification and flexibility. The proposal on the CMO, however, is not ambitious enough.

At a time when the European Parliament and the Council are preparing their respective positions, ECVC recalls that agriculture and food systems are central to both European and global challenges. Geopolitical conflicts, severe climate disruption, dependence on imported inputs and energy, zoonotic outbreaks and recurring global pandemics demonstrate the urgent need for strong democratic and political responses.

Food supply systems are strategic infrastructures. In times of crisis or war, access to food becomes both essential and vulnerable. The European Union therefore bears a responsibility to adopt ambitious public policies capable of ensuring food sovereignty, resilient agricultural systems and fair livelihoods for farmers.

ECVC calls on decision-makers to maintain a strong policy stance on market regulation and remunerative prices to support smallholder farming and maintain the resilience of European and global food systems.



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1. Budget—the EU must invest in its food production

Concerning:

- Proposal 2025/565 establishing the European Fund for economic, social and territorial cohesion, agriculture and rural areas, fisheries and maritime affairs, prosperity and security for the period 2028–2034;
- Proposal 2025/560 establishing the conditions for the implementation of Union support under the CAP for the period 2028–2034;
- Proposal 2025/545 establishing a budget expenditure tracking and performance framework.

A budgetary reduction incompatible with food sovereignty objectives

The Commission’s proposal amounts to a reduction of approximately 20% of the CAP budget, without even accounting for inflation. Such a reduction constitutes a political withdrawal from agricultural, rural and food responsibilities at European level.

This budgetary framework is insufficient to address climate change and environmental degradation; growing social inequalities in food production and access to food; the lack of generational renewal in agriculture; and the weakening of rural economies.

ECVC considers that safeguarding European food systems requires major public investment in food production, strategic autonomy and rural territories.

Risk of renationalisation of the CAP

The proposed reform significantly increases the renationalisation of both funding and policy implementation.

ECVC considers that this approach:

- weakens the common nature of the CAP, and its common market;
- threatens solidarity between Member States by increasing intra-European competition;
- undermines common environmental objectives;
- places the least competitive farms at greater risk.

A strong CAP budget must therefore continue to rely on common rules, shared objectives and European solidarity mechanisms.

Co-financing rules likely to weaken social and environmental ambition

The reform introduces a mandatory 30% national co-financing rate for CAP sanctuary support (excluding income support), and variable co-financing rates ranging from 15% to 60% for non-sanctuary measures.



ECVC warns that these provisions risk encouraging Member States to reduce investment in social and environmental measures. ECVC therefore demands a co-financing of about 10% across all CAP measures to prevent Member States from prioritising certain measures at the expense of others.

Such an approach may trigger downward competition in environmental and social standards, create territorial inequalities between regions and Member States, and weaken rural development and agroecological transition policies.

ECVC therefore calls for:

- increased EU co-financing rates for environmental measures;
- reinforced support for generational renewal;
- stronger rural development instruments;
- enhanced support for areas facing natural constraints;
- mandatory horizontal gender-responsive budget in all NRPPs.

Necessity of maintaining the two-pillar structure of the CAP

ECVC strongly opposes the replacement of the historical two-pillar CAP structure with a single fund.

The merger of funding instruments risks placing environmental measures, settlement and installation support, rural development policies, and support for Areas with Natural Constraints (ANC) in direct competition with fully EU-funded income support.

The transfer of ANC support to a co-financed single fund particularly threatens the continuity of farming in less-favoured territories.

ECVC therefore demands:

- the preservation of the two-pillar CAP architecture;
- a dedicated budget for agroecological transition;
- reinforced support for women farmers;
- reinforced support for installation and settlement;
- maintenance of support for Areas with Natural Constraints.

2. CAP regulation – Farmers need support, agriculture requires youth and environmental ambition

Concerning:

- Proposal 2025/560 establishing the conditions for the implementation of Union support under the CAP for the period 2028–2034;

Farmer incomes are 28% lower than average incomes in other sectors. It is particularly low among small and medium farmers. This demonstrates that the CAP has failed to achieve its core objective of guaranteeing fair livelihoods for farmers. The CAP must guarantee farmers' incomes primarily through remunerative prices from agricultural production, rather than through incentives, including



encouraging diversification away from food production (e.g., activities that do not produce food, such as energy production, carbon farming, or the bioeconomy).

Definition of active farmer

The definition of “active farmer” should be based on the UNDROP framework. It must:

- a) include natural persons who hold an agricultural status, who actually carry out agricultural work in the fields, regardless of the size of their farm, in order to produce food; legal entities in which at least 51% of the capital is held by natural persons who actually carry out agricultural work; and
- b) exclude persons who do not carry out agricultural work, who earn -outside of their agricultural activity- three times the country's median income, in particular those holding companies and other enterprises where the actual beneficiaries of the aid are not farmers.

A natural person justifying their agricultural activity through a legal entity will only be able to declare one legal entity to the CAP, in order to limit artificial legal arrangements (holdings).

Member States shall provide a definition of effective participation in agricultural work which must be based on strict and verifiable criteria and take account of multi-active farmers.

Generational renewal

ECVC highlights major inconsistencies between the Strategy for Generational Renewal and the proposed CAP framework.

The absence of a guaranteed minimum budget for young and new farmers, combined with the continuation of area-based direct payments, reinforces land concentration and discourages new entrants.

ECVC therefore demands:

- raising the maximum age threshold for young farmers from 40 to 45 years;
- extending degressive support mechanisms to new entrants;
- preventing excessive concentration of start-up aid on a small number of large projects;
- reinforcing redistributive support for small and medium-sized farms owned by youth.
- To drop the start-up aid ceilings to EUR 300 000, as it is way too high and it will favour a small number of large projects.

Ending per-hectare payment logic

ECVC supports the progressive dismantling of the Basic Payment Scheme (BPS) and the broader logic of decoupled area-based payments.

Per-hectare payments contribute to:

- land concentration;
- disappearance of farms;
- industrialisation of agriculture.

The reform of support allocation mechanisms must therefore improve targeting toward active farmers and food production.



Capping and degressivity of CAP payments

ECVC regrets the repeated removal of capping and degressivity mechanisms during successive CAP reforms. The European Court of Auditors has confirmed that such mechanisms are necessary to better target income support towards farmers most in need.¹

ECVC therefore demands:

- mandatory capping of all CAP payments;
- mandatory degressivity mechanisms;
- application of environmental and social conditionalities.

The Commission's proposal to cap payments at EUR 100 000 is considered insufficient. According to available data for 2022, only 8.8% of EU farms would be affected by degressivity, and only 0.1% would be affected by capping.

ECVC therefore demands:

- a mandatory cap of EUR 60 000 per active farmer for all CAP payments;
- progressive degressivity below EUR 60 000.

Redistribution of support

Redistributive payments should prioritise:

- first hectares;
- first animals;
- small farms;
- young farmers;
- women farmers;
- agroecological projects.

These redistributive mechanisms are essential to ensure a fairer distribution of public support and to limit its concentration.

Support for small farms

The capping mechanism should be combined with a reallocation of funds toward smaller farms. ECVC welcomes the continuation of support schemes for small farms and the proposal to make such support mandatory for Member States. Small farms contribute significantly to preserving the environment, maintaining a diverse agricultural sector and supporting vibrant rural communities.

ECVC therefore advocates for:

- a mandatory annual flat-rate support for small farms;
- with a cap at EUR 5000 per active farmer (instead of EUR 3000 as suggested by the Commission)
- maintenance of compatibility with Payments Areas of Natural Constraints - ANC;

¹ European Court of Auditors, opinion 05/2026 "concerning the proposals for a regulation of the European Parliament and of the Council establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034 and a regulation amending Regulation (EU) No 1308/2013 as regards the school fruit, vegetables and milk scheme ('EU school scheme'), sectoral interventions, [...], rules on the availability of supplies in time of emergencies and severe crisis and securities (COM(2025) 553 and 560)", Publications Office of the European Union, 2026.



- access for outermost regions to “small farmer” support schemes.

The definition of eligibility must rely on a strict definition of “active farmer”.

Reform of payment methods

ECVC supports the transition toward flat-rate support, enabling the progressive phase-out of per-hectare payments when not relevant, and support payment mechanisms that take agricultural assets and labour into account.

Coupled support

Coupled aid must be maintained.

These supports are important to support weakened production and contribute to food sovereignty. The inclusion of grassland in this support is important to maintain these ecosystems, although it must be combined with animal load on land to ensure the presence of animals. Coupled support for beekeeping is also positive. Coupled support, like all CAP support, must be capped and degressive on the number of animals or per hectare.

Women farmers

The current proposal lacks a gender equality objective in the CAP post-2027. It also lacks concrete measures to support women farmers or to correct structural imbalances related to access to land, finance or training. However, the degressive hectare-based income support (DABIS) leaves the possibility to introduce a modulation of the support for women.

ECVC therefore calls for:

- mandatory modulation of support for women farmers;
- implementation of agricultural replacement services;
- mechanisms addressing structural inequalities affecting women in agriculture.

Social conditionality

Agricultural workers are essential to our agricultural system: more than 10 million workers in Europe, 32% of whom are undeclared, resulting in more than 150,000 accidents at work each year.

ECVC therefore considers it essential to:

- strengthen social conditionality;
- strengthen monitoring and sanctions;
- extend conditionality to fruit, vegetables and wine sectors;
- establish binding control targets;
- implement dissuasive sanction mechanisms.

Ring-fenced budget for environmental and climate measures

ECVC calls for an ambitious ring-fenced budget dedicated to climate and environmental measures.

Insufficient environmental funding would delay the agroecological transition, penalise already sustainable farms, and undermine biodiversity and climate objectives.



There should be remuneration for favourable practices: it could be similar to current agri-environmental and climate measures (AECMs) for maintaining practices, support for maintaining organic farming and conversion.

ECVC calls for Compensation for production costs and additional working time related to natural handicaps in disadvantaged areas (type Compensatory Allowances for natural Handicaps - CANH) and structural handicaps (abandonment, remoteness, logistical difficulty, etc.).

The CAP must support both transition toward more sustainable agricultural practices and maintenance of farms already implementing environmentally friendly systems.

Environmental conditionalities for all CAP payments

All CAP payments should be attached to environmental conditions. Given the scale of climate change, the deterioration of the status of water, soil and biodiversity, it is imperative that the CAP combines transitional measures accompanying changes in practices and mechanisms to ensure that the most environmentally and climate-friendly farms are able to maintain themselves even if their production costs may be higher due to their environmentally friendly methods.

The main lines of conditionality must be defined at the European level

Responsibilities of environmental measures

The legislation should make clear whether environmental policies will fall under national or regional competence, to avoid creating conflicts of competence, budgetary disputes between Member States and regions and unequal implementation of environmental objectives.

3. Common Market Organisation – improve European agriculture by regulating the market

Concerning:

- Proposal (2025) 553 as regards the school fruit, vegetables and milk scheme ('EU school scheme'), sectoral interventions, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties, rules on the availability of supplies in time of emergencies and severe crisis and securities.

ECVC welcomes the proposal reinforcing school meal programs, the possibility of sourcing food locally and from smallholder farms; improvements to crisis prevention and management instruments; the development of strategic public food stocks. However, this regulation is highly strategic and considers that the proposed revision remains insufficiently ambitious given the scale of current global crises.

Strategic public food stocks

The doubling of the budget allocated to crisis food stocks constitutes a positive signal, and the new storage strategy is necessary.



ECVC nevertheless stresses that strategic stocks must remain public in order to guarantee management in the public interest.

These public strategic stocks must be organised within the CMO to stabilise markets and protect farmers from market instabilities by securing their income. The regulation must organise purchasing surpluses and releasing food in case of high demand, as is now the case in India and China. These stocks must also play a role in prioritising agroecological farming.

School meal programmes

School meal programs must ensure children have access to healthy seasonal and locally sourced food. Public procurement rules should prioritise local supply chains and short food circuits in order to enable farmers to sell their products locally and reduce costs thanks to short food supply chains. This is particularly important to support regional food economy and farmers' resilience.

Intervention prices

ECVC calls for intervention prices under the CMO to be updated to at least 80% of average production costs in each sector.

Such an adjustment is necessary to guarantee remunerative prices and fair incomes for farmers.

Limiting the role of private insurance schemes

ECVC considers that private insurance mechanisms have demonstrated major structural limitations.

These systems primarily benefit private interests; cover only a minority of farmers; fail to address the diversity of production systems; do not adequately respond to increasing climatic hazards.

ECVC therefore calls for the development of:

- mutual funds;
- solidarity-based professional funds;
- public risk management mechanisms.

Crisis facility fund

ECVC supports the creation of a dedicated facility fund within the National and Regional Partnership Plans (NRPPs) for payments to farmers in times of crisis.

This fund must be ring-fenced exclusively for crisis support mechanisms benefiting farmers.

ECVC reminds that an early warning system for crisis is necessary.