

To: Christophe Hansen, Commissioner for Agriculture and Food

Cc: Elisabeth Werner, Director General; Catherine Geslain-Lanéelle, Director for Strategy and Policy Analysis

Brussels, 10<sup>th</sup> July 2025

**Subject: Concerns regarding the process leading to the European Commission proposal for the post-2027 CAP**

Dear Commissioner Hansen,

We are writing to share concerns regarding the way the European Commission has handled public participation in the preparation of the post-2027 Common Agricultural Policy (CAP) proposals. While we are very grateful for the constructive discussions we have had with you, your cabinet, and services in recent months, we are troubled by the inadequate stakeholders' engagement, absence of public consultation, and lack of transparency that have characterised the process, in contradiction with the Commission's [Better Regulation Guidelines](#). Transparency and inclusivity are paramount to ensure that all voices are heard and considered in the decision-making process and for ensuring sound decision making.

Our concerns are primarily focused on the following areas:

**Lack of an inclusive, transparent, and evidence-based public consultation process:**

- Targeted and closed-door stakeholder consultations cannot replace an open public consultation. The CAP constitutes the largest spending programme of the EU and has impacts on every EU resident through the food we eat, the landscapes around us, and the substantial environmental impacts of agriculture, sometimes positive but still mostly negative. The right of the public to participate in the EU's decision-making is also established by the EU Treaties. All Europeans should therefore be given a formal opportunity to share their views on the future of this policy.
- The limited stakeholder consultation process has fallen short of the EU's own rules on transparency and evidence-based decision-making. Apart from vague principles in the 'Vision for Agriculture and Food', the Commission did not set out policy options for the future CAP nor did it refer to all available evidence on the implementation of the current policy to allow for meaningful feedback from stakeholders or the wider public. The absence of a call for evidence feeding into the Inception Impact Assessment raises concerns about the quality of the impact assessment process and led to a lack of transparency as to which policy options have been assessed.

**Precipitated discussions disregarding the shared Strategic Dialogue consensus in the European Board for Agriculture and Food (EBAF):**

- The discussions on CAP in the EBAF were announced and kick started in May, with members given only one month to deliver a consensus statement, despite EBAF being established since February. This timeline was direly inadequate, both in that it did not allow for meaningful discussion and effective consensus-building; and in that it took place very late in the policy-making process; putting into question the usefulness of any output in genuinely informing the Commission's reflections.
- We are also deeply concerned about the disregard shown by several EBAF members for the [Strategic Dialogue \(SD\) consensus](#), despite being signatories to it and the vast majority of EBAF members calling for this consensus to be the shared starting point for EBAF discussions. The EBAF was set up in response to the Strategic Dialogue in order to "identify strategies necessary to the implementation and further development of the Strategic Dialogue's conceptual consensus in order to make agri-food systems more sustainable and resilient". Our organisations have invested significant time and resources in good faith to participate in the SD and we have honoured its historic consensus since. If, in spite of this, some members refuse to focus their efforts on operationalising the SD recommendations and instead try to use EBAF as a vehicle to undermine them, it calls into question the value and effectiveness of such a forum. We therefore call on you to ensure the EBAF stays true to its origins and [mission](#), namely to "follow up on the report of the Strategic Dialogue on the future of EU agriculture".

#### **Redundancy and imbalanced participation in Civil Dialogue Group (CDG):**

- Holding a discussion on the future CAP in the CDG on CAP and Horizontal Matters less than a week after discussions in EBAF, based on the same questions and with largely overlapping membership, raises questions about duplication and the added value of these fora. The only notable difference between these meetings was the input provided by DG AGRI to inform the discussion in the CDG, which was welcome.
- Some CDG members dominated the discussion, with several representatives from the same organisation repeatedly taking the floor to reiterate the same points. This limited the diversity of perspectives and hindered a balanced and comprehensive dialogue. This situation confirmed previous concerns we have voiced to the Commission regarding the structural imbalance in participation in CDGs which unavoidably results from allowing several 'active' participants per organisation. As all CDG members are required to have a pan-European mandate, having one or two representatives per meeting should suffice to contribute a diversity of perspectives and lead to more balanced and time-efficient meetings.

In light of these concerns, we would like to make the following recommendations to improve the transparency, inclusivity, evidence base and effectiveness of future discussions:

- **Ensure the highest standards of public consultation, evidence-based policy-making, and transparency:** Due process regarding public consultations and impact assessments must be followed at all times, adhering to the Commission's own Better Regulation Guidelines. Following the publication of the next Multi-Annual Financial Framework, we expect the Commission to run a public consultation on the detailed

policy design options of the post-2027 CAP, accompanied by a thorough impact assessment, and we also expect that the Commission will demonstrate that it conducted a consistency assessment of the CAP post-2027 with the EU's climate objectives, as required by Article 6(4) of the EU Climate Law.

- **Avoid duplication between consultative bodies:** To mobilise stakeholders' time efficiently and effectively, discussions should take place either within the EBAF or CDGs, with the former focused on building consensus on high-level policy choices while the latter focus on monitoring implementation and more technical policy discussions.
- **Ensure all discussions and consultations are grounded in evidence and informed by concrete policy options:** Whenever stakeholders' views are requested, whether in the EBAF, CDGs, or public consultations, scientific facts and up to date data on policy implementation must underpin the discussion and the Commission should provide information on the concrete policy options under consideration to allow for informed and constructive input.

In a context of rising attacks on democracy and increasing mistrust in institutions, ensuring the highest standards in transparent, inclusive, and evidence-based policy-making is essential. We therefore call on you to heed our recommendations and uphold the Union's democratic values. We look forward to continuing our collaboration with you and your team to achieve these goals and stay at your disposal for any clarification on the above.

Yours sincerely,



Patrick ten Brink, EEB Secretary General, also on behalf of

Ariel Brunner, Regional Director of BirdLife Europe and Central Asia.

Anais Berthier, Head of the Brussels office of ClientEarth

Marco Contiero, EU Policy Director on Agriculture at Greenpeace European Unit