



To: Agriculture Ministers of EU Member States

Cc: Commissioners for Agriculture and Food, and for Environment, Water Resilience and a Competitive Circular Economy, and the Chairs of the European Parliament Agriculture and Environment Committees

Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 27 and 28th of October 2025

Brussels, 22nd of October 2025

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share our views on the issues on the agenda of the forthcoming Agriculture and Fisheries Council meeting of the 27 and 28th of October. We invite you to take our concerns into account during the final preparations as well as at the Council meeting itself. You will find in this letter our answers to the guiding questions provided by the Danish Presidency on the CAP post 2027 green architecture prior to the Council.

To what degree does the proposal achieve the objective of making it simpler and more attractive for farmers to deliver on the green transition?

The European Commission's CAP proposal fails to make the green transition simpler and more attractive to farmers. While the efforts to streamline EU budget lines and having a common system for tracking and monitoring the spending are welcome in principle, there remains a need for meaningful common rules and a robust performance system to ensure that the policy delivers on EU's environmental objectives. By handing broad discretion to Member States without clear EU-level guidance, the proposal risks creating a patchwork of rules that vary wildly across borders.

This undermines the very idea of simplification, replacing one form of complexity with another less visible but equally burdensome one. While different rules between Member States can coexist with simplification, this is only true if they are genuinely simpler for farmers and national administrations. The real issue at play is the race to the bottom that this flexibility encourages, putting farmers in competition across borders and incentivizing ministers to design the least demanding measures (e.g., high hectare-based payments, no capping). The removal of EU-level GAECs in favour of nationally defined "protective practices" exemplifies this trend, weakening the baseline and contributing to legal uncertainty. Without clear minimum standards and stronger EU oversight, the green transition risks becoming fragmented and unfair.

European Environmental Bureau

• Rue des Deux Églises 14-16, 1000 Brussels, Belgium • ☎ +32 228 91090 • eeb@eeb.org • www.eeb.org
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To prevent this, the EU must define minimum protective standards and ensure that all farmers are held to comparable expectations. Transparency is essential and should be strengthened: CAP plans and Commission evaluations must be made public and enforceable to allow scrutiny and accountability. This principle should apply broadly across the CAP, not just to environmental measures. Without these safeguards, the green transition risks becoming uneven, ineffective, and ultimately unfair.

One of the key pre-conditions to make the green transition attractive to farmers is to provide them with adequately funded incentives. Regarding these, we see a similar disappointing picture where the supposed move from conditions to incentives is hollow. Without a dedicated budget or robust financial mechanisms, the proposal offers little more than rhetorical encouragement. While the introduction of the new transition instrument could, in practice, provide a clear and simple pathway for farms to transition their operations, without guaranteed funding and advisory capacity, it risks becoming a symbolic gesture rather than a practical tool.

Ultimately, the proposal weakens environmental ambition, fragments legal certainty, and fails to make the green transition either simpler or more rewarding for those expected to deliver it.

Given the lack of a specific green ring-fencing for the CAP, how can a level playing field for farmers be ensured when it comes to the green transition?

In order to ensure green transition, it is paramount that the next CAP has a dedicated budget for environmental and climate action. Without guaranteed funding for environmental measures, farmers across the EU will face vastly unequal access to support, especially in Member States with limited public budgets. This undermines the principle of a level playing field and risks turning the CAP into a fragmented system where sustainability depends more on geography than on policy.

As agreed in the Strategic Dialogue on the future of agriculture, there must be an increase in such incentive funding. A robust ring-fencing – starting at the current 35 % and raising to 50% of income support measures by the end of the next CAP – must therefore be reinstated to ensure that environmental and climate measures are not optional or symbolic. These funds are strategic investments in the resilience of European agriculture. Properly targeted, they enable farms to adapt to climate pressures, reduce dependency on costly inputs, and become more resilient to shocks. This, in turn, lowers the need for ex-post crisis spending – making it a win-win for farmers, governments, and taxpayers alike. Yet without a clear budgetary commitment, these benefits remain theoretical.

Equally essential is the inclusion of a no-backtracking clause, as in the current CAP, which would ensure that farmers who have been implementing agri-environmental schemes and eco-schemes can continue taking action for the environment, climate and animal welfare without losing support or facing reduced incentives. This safeguard already exists in the current CAP and must be retained and strengthened. Without it, there is a real risk that environmental ambition will regress under pressure from short-term political or economic interests that overlook the long-term resilience of farms and the broader benefits of investing in sustainability.

Furthermore, it will be critical to directly address the structural flaws in how CAP funds are currently allocated and tracked. In the proposed reform the Degressive Area-Based Income

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Support (DABIS) will continue to absorb a disproportionate share of the budget, despite being one of the least effective tools for supporting the green transition of the sector. Ensuring an efficient capping and degressivity of this mechanism in all Member States would free up substantial resources that could be redirected toward meaningful environmental and climate action. At the same time, the 43% spending target for climate and environment in National and Regional Partnership Plans (NRPPs) offers little reassurance, as the underlying performance framework is deeply flawed. Particularly problematic is the methodology arbitrarily labelling 40% of DABIS spending as green spending without justification, turning the tracking system into a greenwashing exercise rather than a credible accountability tool, which would ensure funding is directed evenly across the EU towards the green transition of agriculture.

Funding mechanisms must also be rebalanced. Relying on national co-financing for agri-environmental measures is a recipe for inequality. These measures should be allowed to be fully financed from the EU budget to ensure that all farmers, regardless of national budget constraints, have equal access to support.

Finally, the transition must be supported with real capacity-building. EU-backed advisory services and training programs should be universally accessible. Without these measures, the CAP risks entrenching inequalities and delivering uneven environmental results.

Without correcting these distortions, the CAP risks continuing to reward inertia rather than transformation. Whether through ring-fencing or structural reform, the goal must be the same: ensuring that public money drives real environmental outcomes and supports all farmers fairly in the transition.

Thank you in advance for your consideration of these points which will help address the climate, biodiversity and pollution crises in the EU and give farmers and citizens the confidence that their leaders are taking decisions to create the basis for a better future for them.

Yours sincerely,



Patrick ten Brink,
Secretary General of the European Environmental Bureau

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