







To: Agriculture Ministers of EU Member States

Brussels, 13 November 2025

Subject: Post 2027 Common Agricultural Policy - Food security and targeting of support

Dear Minister,

This letter is a contribution to the public debate of Agriculture Ministers planned on 17th of November 2025 during the AGRIFISH Council meeting on the topic of food security and targeting of support in the proposal for a Common Agricultural Policy (CAP) post 2027. We would like to draw your attention to the following points and respectfully ask you to consider them in the upcoming debate.

1) <u>Target support at the transition: invest in environmental and climate actions on farms to secure current and future food security</u>

Biodiversity loss, climate breakdown and pollution are the main threats to the availability of food, both in the short and long term. Conventional agricultural practices and mainstream food systems are depleting essential factors of production - soil, water, biodiversity and climate - thereby making Europe less resilient to future shocks. Already today, climate-induced droughts, floods, and cold spells are impacting yields. If we keep failing to take serious action to tackle this triple crisis, their impact will increase.

To ensure current and future food security, the EU agriculture and food policies must:

- Target support at practices that are beneficial to the environment and climate This means targeting support at organic farming and other agroecological practices as they actively contribute to food security by diversifying production, boosting circularity and farm input autonomy while having a positive impact on soil, water, biodiversity and climate. Such investments should also enhance farmers' ability to absorb economic and environmental shocks, mitigate risks associated with climate change, and contribute to the stability of their livelihoods against future uncertainties.
- **End harmful subsidies** Farm stewardship requirements should be strengthened to guarantee effective protection of natural resources and ensure a level-playing field across the single market. This would require replacing the currently vague 'protective practices' objectives with a set of clearly defined actions and quantifiable objectives that can be monitored and evaluated. At the same time, robust safeguards against environmentally

- harmful subsidies, including an improved negative list for investment and productionrelated support, are needed to prevent harmful subsidies that undermine the transition.
- Move to a genuinely performance-based policy A set of clear performance indicators should be developed and monitored to assess the impact and progress of supported practices on environment and climate (such as Farmland Bird Index, Pollinators indicator, indicators on the reduction of pesticides use and toxicity and gross nutrients balance indicators).

2) Reduce dependency on external inputs and imports and strengthen farm autonomy to ensure the EU's independence

The EU does not face food shortages or a food availability issue, but rather food mismanagement. The problem is not that we don't have enough food or space to grow food, but what the food grown is used for. With only one third of the EU's cereals used for human consumption, the vast majority of cereal in the EU is used to feed animals (two thirds) or biofuels (3%). Food security would be strengthened by redirecting production from fuel and feed towards food for human consumption. At the same time, conventional farms in Europe lack autonomy due to heavy reliance on the imports of soy for feed and synthetic ferlilisers for crops. This external dependency, paired with globalised supply chains, makes the EU farming sector extremely vulnerable, multiplying threats to our food security.

To increase Europe's farmers autonomy and food security, the CAP must:

- Support a just transition in the livestock sector The CAP should support the reduction of livestock numbers in excessive high-density areas and promote extensive animal farming systems. Extensive livestock systems based on grazing should be promoted and receive specific support. These practices include notably agroecological approaches with higher animal welfare standards, and that carry out their activities in areas with high biodiversity value. Livestock systems with high labour intensity like pastoralism should be supported via adequate instruments in line with the ecosystem and social services they restore and maintain.
- Provide targeted incentives for farmers to diversify into plant-based food production to lower transition barriers and increase demand for sustainable foods, while strengthening plant-based agrifood value chain.
- Promote diversification and circularity for increased resilience Diversification of production is key to increasing resilience, sustainability, and health. Diversification should therefore be at the heart of a risk management policy. Agroecology, including organic farming, diversification and nature-friendly farming, are proven approaches to increase the agronomic and economic resilience of farms. The CAP should eliminate obstacles for diversified crop production and protein consumption, and support circular practices, to reduce the need for external inputs.
- **Targeting socio-economic support to social sustainability objectives** Ensure social payments for farmers reach those who need it most.
- **Support local food economies and shorter supply chains –** The CAP should promote short supply chains and supporting infrastructure to strengthen local markets,

improve local farm incomes, revive rural areas, and reduce environmental and social impacts linked to long-distance transport and retail.

3) Adopt a comprehensive definition of food security, beyond food production

Finally, the European Commission proposal on CAP post-2027 mentions food security several times yet does not define it. The absence of this key concept leaves the proposal open to interpretation and may hinder coherent implementation and evaluation.

While the debate so far has focused mainly on one dimension of food security - ensuring production of food in the short term - a comprehensive EU policy for food security should:

- Tackle all dimensions of food security availability, access, utilisation and stability as per the UN Food and Agriculture Organisation (FAO) definition: "food security exists when all people, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life".
- Address food waste, diets, prices and inequality of access to healthy and nutritious food, thus going beyond the current focus on food availability.

Yours sincerely,

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Patrick ten Brink, Secretary General, European Environmental Bureau

Also, on behalf of:

Ariel Brunner, Regional Director, BirdLife Europe and Central Asia Marco Contiero, EU Policy Director on Agriculture, Greenpeace European Unit Andreas Baumüller, Programme Director Natural Resources, WWF European Policy Office

For more details on these proposals:

<u>Joint vision for the CAP</u>: a proposal for a performance-based policy to drive the transition of Europe's food and farming sector, May 2025

<u>Joint reaction to the CAP proposal</u>: CAP: from flawed proposal to real transition, September 2025

Joint food security fact sheet, June 2022

WWF report 'Europe eats the world', May 2022