

**To: Agriculture Ministers of EU Member States**

**Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 11<sup>th</sup> of December 2025**

Brussels, 09-12-2025

Dear Minister,

This letter aims to contribute to the public debate among Agriculture Ministers scheduled for 10–11 December 2025 during the AGRIFISH Council meeting on innovation and simplification in the proposal for the post-2027 Common Agricultural Policy (CAP). We respectfully draw your attention to the following points and ask that you consider them in the upcoming discussions.

### **Innovation**

The increasingly unstable geopolitical context, the accelerating impacts of climate change, and the prospect of global population growth are urgent wake-up calls. To ensure food security for Europe and the world while keeping our food systems within planetary boundaries, we must fundamentally change how we produce and consume food. Biodiversity loss, climate breakdown, and pollution are already undermining the very foundations of food production – soil, water, and ecosystem services – making Europe less resilient to future shocks. Innovation in its broadest sense is essential. We cannot continue doing more of the same and expect different results. However, placing all our hopes on a narrow set of new technologies is not the solution. Precaution must not be sacrificed on the altar of short-term competitiveness.

Technological innovation should be seen as one tool among many, not an end in itself. Scientific consensus is clear: technological fixes alone will not suffice. A deeper transformation of the agri-food sector is needed, as highlighted by the Strategic Dialogue. While precision agriculture and other high-tech solutions have an important role to play, it is crucial that we do not lead farmers into yet another dependency – this time on even more capital-intensive systems. Instead, we must unlock the potential of social and farmer-led innovations, leverage advances in soil science, and develop solutions that promote sustainable and healthy diets. Innovation is also critical in policy design, where digitalisation can help create simpler, more effective frameworks. Above all, innovation must strengthen food security by reducing dependency on external inputs, promoting diversification and circularity, and supporting agroecological practices that restore resilience. By embracing a holistic approach to innovation, we can build a food system that meets sustainability goals and secures Europe's ability to feed its population in the long term.

### **Simplification**

Simplification is a mean to an end, not an end in itself. Simplification should be focused at fostering EU laws implementation, it should focus on smarter implementation, not dismantling protections. Simplification must not become deregulation: it should make laws more efficient, accessible, and enforceable while preserving environmental, health, animal welfare, and social protections. It can also remove overlaps and clarify responsibilities among economic operators. This is crucial given the estimated €180 billion annual cost of poor implementation of EU environmental law – around 1% of EU GDP.

Yet, recent “simplification” initiatives, such as omnibus I and the CAP omnibus have weakened climate and environmental safeguards, jeopardising EU targets and threatening the necessary transition to sustainable farming. Additionally, deregulation erodes competitiveness and the

methods used contradict Better Regulation principles. This was confirmed by the findings of maladministration from the European Ombudswoman in the ‘urgent’ omnibus proposals (e.g., CAP, Corporate Sustainability Due Diligence), citing skipped impact assessments and poor stakeholder consultation<sup>1</sup>. She called for consistent application of Better Regulation rules, mandatory climate assessments, and minimum consultation standards.

We are concerned that current approaches risk undermining long-term sustainability and resilience of the food and farming sector. In an era of accelerating climate impacts, widening inequalities, and global instability, Europe needs stronger, future-oriented regulation, legal certainty, and accelerated decarbonisation – not deregulation. Looking ahead, the next CAP must embrace smart implementation built on three principles:

- **Maintain strong environmental and climate standards as non-negotiable foundations.** Weakening these rules would further degrade soils, water, and biodiversity – the very resources that underpin Europe’s ability to produce food.
- **Reduce administrative burden through harmonisation and digitalisation,** for example by using satellite data to cut on-the-spot checks and harmonise and streamline reporting to ensure farmers need to report the same data only once.
- **Support Policy Goals:** Simplification should help achieve defined policy objectives and public interest goals by enabling smarter, more effective implementation. It must improve efficiency without sacrificing accountability. A performance-based approach is essential to ensure public funds promote practices that restore resilience, reduce dependency on external inputs, and strengthen autonomy—key pillars of long-term food security.

Farmers need clarity and support, not deregulation. True simplification should empower them to adopt sustainable practices, strengthen resilience, and restore trust in a policy that serves both farmers and society. In light of the above position on simplification, the next CAP reform presents both opportunities and risks:

- **Environmental incentive measures (AECA):** The merging of eco-schemes and AECMs offers a legal simplification. Additionally, introducing a lump-sum transition scheme could provide a straightforward tool to support farmers in transitioning their farms—provided it is designed effectively.
- **Commission’s strengthened oversight and observation letters made more structured:** the Commission’s role in shaping plans via recommendations and observation letters is now clearer in law – which improves governance and reduces fragmentation.
- **Reinforcing the partnership principle** – the proposal strengthens partnership rules. This is positive governance simplification that improves stakeholder participation and transparency.
- **‘Protective Practices’ under ‘Farm Stewardship’:** While presented as a simpler and more flexible model, removing the existing common GAEC framework risks fragmenting rules across the EU and even within Member States. This could create a confusing patchwork of regulations and trigger a race to the bottom in standards. Common thresholds or more concrete aims should be introduced.
- **Automatically labelling many income support measures as DNSH-compliant:** this is a simplistic shortcut with no real checks on whether it, in fact, removes double regulation.

---

<sup>1</sup> <https://www.ombudsman.europa.eu/en/press-release/en/215989>

- **Removal of biodiversity spending tracking:** Eliminating the dedicated biodiversity tracking category from the Multi-Annual Financial Framework is a simplification that harms accountability and hides spending cuts.
- **The removal of biodiversity performance indicators** – this amounts to harmful simplification that makes performance assessment weaker.

We hope that the above points are helpful for your discussions and we thank you for taking the above into account.

Kind regards,

Patrick ten Brink,  
Secretary General

