



OPINION

European Economic and Social Committee

Common Agricultural Policy (CAP) post-2027

Proposal 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
(COM(2025) 560 final – 2025-241-COD)

NAT/960

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Legislative procedure Referral	EU Law Tracker European Parliament, 6/11/2025 Council of the European Union, 17/9/2025
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European Commission documents	COM(2025) 560 final – 2025-241-COD Summary of COM(2025) 560 final – 2025-241-COD
Relevant Sustainable Development Goals (SDGs)	SDG 2 – Zero hunger SDG 16 – Peace, justice and strong institution
Section responsible	Section for Agriculture, Rural Development and the Environment
Adopted in section	15/12/2025
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Plenary session No	602
Outcome of vote (for/against/abstentions)	177/18/24

1. RECOMMENDATIONS

1.1 The EESC rejects the proposal. It is unacceptable based on:

- the fact that the proposal has no directional purpose, clear objectives or long-term vision for EU agriculture other than imposing a major CAP budget cut, which will be extremely damaging to EU agriculture;
- the failure to meet the needs of EU agriculture as outlined in the Commission's own Vision for Agriculture and Food¹ as well as by the Council, the Parliament, the EESC and other key stakeholders;
- a totally inadequate financial allocation for the CAP in the next multiannual financial framework (MFF), involving a 20% budget cut in nominal prices (41% in real prices), which will undermine EU agricultural policy, food security, climate and environmental protection as well as the income and viability of farmers and rural areas;
- the dismantling of the successful and reliable two-pillar model of the CAP under the proposal for the National and Regional Partnership Fund (NRPF) which will lead to fragmentation of the CAP provisions and erode rural development, investment, competitiveness, sustainability and territorial cohesion;
- the erosion of some of the key common provisions of the CAP will lead to re-nationalisation of agricultural policy and wearing down of the integrity and functioning of the single market;
- the increased complexity and costly administrative reorganisation in the CAP and MFF structures leading to more bureaucracy instead of much-needed simplification;
- the failure to properly improve and strengthen farmers' position in the food supply chain;
- ultimately, the fact that the proposal undermines the whole basis of the common agricultural policy.

1.2 However, in line with the important role of the EESC in helping to ensure civil society participation and input into EU policy, the EESC wishes to provide the following views on the CAP proposals.

The European Economic and Social Committee (EESC)

1.3 proposes a strong 2028-2034 CAP based on an increased, standalone and dedicated budget, properly adjusted for inflation, in order to meet the objectives set down in the Treaty on the Functioning of the European Union (TFEU) including increasing agricultural productivity, ensuring a fair standard of living for farmers and agricultural workers stabilising markets and ensuring the availability of supplies and reasonable prices for consumers, all while supporting EU food security and sovereignty, the European model of agriculture, the potential attractiveness for the next generations, and supporting farmers in contributing to the green transition and improving their sustainability and resilience, especially when confronted by the triple planetary crisis, as well as meeting the growing geopolitical and societal demands;

¹ [COM\(2025\) 75 - A Vision for Agriculture and Food: shaping together an attractive farming and agri-food sector for future generations.](#)

- 1.4 calls on the European Commission to restore the CAP budget to a level of 0.5% of EU GDP. The EESC rejects the proposal in the MFF to cut the CAP budget by 20% in nominal prices (41% in real prices) for 2028-2034;
- 1.5 underlines that while subsidiarity can certainly play a constructive role within defined limits, budgetary subsidiarity is incompatible with the overarching objectives and common purpose of the CAP;
- 1.6 calls on the European Commission to submit proposals introducing substantial modifications, in particular concerning the budgetary envelope, as was undertaken in January 2026. It further stresses that such revisions should not be limited to the mere unlocking of additional appropriations, nor should they consist solely of granting early access to funds initially allocated for the mid-term review, but should genuinely increase the budget dedicated to the CAP;
- 1.7 highlights the need to index-link the CAP budget and direct payments to keep pace with cost inflation, help protect farm incomes and maintain stable food prices; furthermore, we propose that the MFF and CAP budget allocations for Member States are increased to provide fairness and a reduction in disparities in agricultural payment levels among Member States;
- 1.8 encourages the Commission to establish new income streams in the next MFF which support and bolster confidence in the CAP and avoid creating a state of anxiety and anger among farmers and the rural community towards the EU, through severe budget cuts;
- 1.9 points out that the independence and integrity of the CAP must be respected, ringfenced and maintained in line with the TFEU in the next MFF;
- 1.10 stresses the need for the CAP to complement the principle of equivalence of standards, recognising that European farmers adhere to much higher environmental, social and health standards than those applied in other countries which in turn has to be recognised via financial support and other measures, e.g. strong European food promotion and 'buy European' campaigns;
- 1.11 insists that the CAP must be an EU-wide policy as opposed to a CAP based on national recommendations. The EESC is absolutely opposed to renationalisation of the CAP;
- 1.12 insists that a comprehensive economic, environmental and social impact assessment of the proposed MFF and CAP reforms must be undertaken with viable alternatives and protective measures for farmers including the effects on the agri-food chain, processing capacity, rural employment and border region security of supply;
- 1.13 supports the retention of the current EAGF and EAFRD funding and the two-pillar model of the CAP with targeted income support and eco-scheme payments provided to active farmers through Pillar 1, supplemented by additional dedicated sector-specific supports for vulnerable sectors, as well as rural development, investments, value-adding and agri-environmental supports through Pillar 2;
- 1.14 believes genuine active farmers engaged in agricultural production should be eligible to claim CAP payments;

- 1.15 considers that direct payments should be capped at a fair and reasonable level for individual active farmers, including those who have formed an association, with adjustments to take account of partnerships, co-operatives, companies and the number of employees on social security. Capping should not apply to voluntary environmental measures and to measures which supply public goods². The EESC supports the mandatory threshold of EUR 100 000 as proposed by the European Commission;
- 1.16 warns that degressivity of area-based payments will erode farm incomes and undermine the viability of existing farmers;
- 1.17 stresses that the Commission should not discriminate against genuine active farmers based on old age or pension status in the allocation of direct payments, but should rather incentivise targeted financial schemes to facilitate the transfer of the farm ownership from older farmers and pensioned farmers to young farmers³, without unnecessarily inflating land prices;
- 1.18 supports and maintains the economic viability of agricultural activity through adapted tools and by simplifying and reducing the administrative burden⁴;
- 1.19 encourages protective science-based climate and environmental practices and sustainable, holistic systems of production such as organic and regenerative farming and other agroecological systems, through sufficiently funded initiative measures;
- 1.20 stresses that measures relating to the Agricultural Knowledge and Innovation System (AKIS), LIFE programme, POSEI scheme and LEADER territorial development must remain financially protected and ringfenced under Pillar 2 to ensure stable and widespread access to knowledge, advisory services and practical innovations as well as positive rural development for male and female farmers;
- 1.21 strongly supports the proposals prioritising generational renewal strategies and targeting support measures to help the entry and establishment of young and female farmers through starter packs and other measures. This must be financed by a strong CAP budget allocation and it cannot be at the cost of income of existing farmers;
- 1.22 supports strengthening the EU food supply chain in terms of rebalancing power in the food supply chain, the abolition of below-cost selling, crisis-proofing with improved and additional crisis management tools and insurance schemes against natural disasters;
- 1.23 welcomes the proposals on CAP budget indexation as a step in the right direction, clarifying that it must apply to CAP direct payments; furthermore, we propose that the MFF and CAP budget

² [OJ C 283, 10.8.2018, p. 69.](#)

³ See for example the [Directory Departure-Installation](#) in France.

⁴ OJ C, C/2026/38, 16.1.2026, ELI: <http://data.europa.eu/eli/C/2026/38/oj>.

allocations for Member States are increased to provide fairness and a reduction in disparities in agricultural payment levels among Member States;

- 1.24 supports the proposal to increase the Unity Safety Net but insists that the cost of this cannot be a poor trade policy that undermines the EU market, such as the Mercosur deal;
- 1.25 recognises the importance of consolidating social conditionality and assuring a clear link with the CAP proposals. Specifically, the EESC is in favour of promoting fair working and living conditions and protecting workers' rights. No farm should be exempt from controls and penalties relating to social conditionality, and its overall integrity must not be undermined because of the fact that fines are set under national law. The scope should be widened, with better enforcement of social conditionality. Given the persistent and worsening labour shortages across the agricultural sector, the aim here is to support the creation of high-quality jobs with fair wages and safe working conditions;
- 1.26 highlights the major political risks for the EU and some Member States due to the flexibility mechanisms provided under the NRPF for excluding support for agriculture, rural development and rural areas currently guaranteed under CAP Pillar 2 and the risks associated with agricultural and cohesion funds having to compete for projects, which would hamper the reduction of inequalities; while acknowledging the Commission's recent proposal to dedicate 10% of the relevant envelopes to rural areas, the EESC stresses that this level of allocation is insufficient to address the diversity and scale of socio-economic, demographic and service-provision challenges faced by rural areas. A more ambitious ringfenced place-based allocation is required to ensure that EU investment effectively supports sustainable territorial development.

2. **EXPLANATORY NOTES**

Arguments in support of 1.1

- 2.1 Recent reforms have involved some undermining of the basic CAP principles with budget cuts, no allowance for inflation and requiring farmers to do more for less. CAP funding was not used to its full potential to incentivise and support farmers to improve the sustainability of their farms and practices. The CAP should be instrumental in fighting climate change, enhancing biodiversity, resilience and sustainability, and promoting the strategic role of European farmers as multifunctional actors at the service of communities, territories and social cohesion.
- 2.2 The CAP reform and the MFF should focus on securing a strong CAP budget, which will guarantee an adequate and sustainable supply of high-quality, safe food and a sufficient income for farmers, rewarding active farmers and productive land use, supporting evidence-based environmental measures that work alongside output and efficiency and sustainable, holistic, systems of production such as organic farming and other agroecological systems, recognising and supporting sustainability in terms of long-term resilience.

2.3 A new JRC report entitled Scenar 2024⁵ provides an interesting analysis of different policy orientations for the CAP and how they could shape the agricultural landscape and their environmental impact. Three different scenarios are analysed including a productivity and investment approach, an environment and climate approach and a ‘no CAP’ scenario. With the ‘no CAP’ scenario, farm incomes and production fall significantly, exports decline and imports increase, consumer prices rise and 250 000 jobs are lost. The EU’s greenhouse gases (GHGs) fall by 12.4mt of CO₂e but global GHGs increase by 20.6mt, giving a net increase of 8.2mt. Under the environment and climate approach, production falls, consumer prices rise, imports increase and exports fall, along with the loss of 90 000 jobs. EU GHGs decrease by 6mt but global GHGs increase by 16mt of CO₂e through leakage, leaving a net increase in GHGs of 10mt of CO₂e. Finally, under the productivity and investment scenario, production increases, prices rise, exports increase, imports fall and employment increases. EU GHGs increase by 2mt but global GHGs decline by 11.00mt of CO₂e, giving a net GHG reduction of 9mt.

Arguments in support of recommendation 1.3, 1.4, 1.5, 1.6, 1.7, 1.8

2.4 The 2028-2034 Commission’s proposed ringfenced amount of funding for CAP income support is EUR 295.7 billion in current prices. In the current MFF, this is EUR 387.8 billion for 2021-2027. Therefore, in nominal terms the budget proposal involves a reduction of EUR 92.1 billion, or 24%. In real terms, the reduction would be significantly higher. If the 2021-2027 CAP budget of EUR 336 billion in 2018 prices were adjusted for inflation to 2025 levels, it would need to be EUR 436 billion. Compared to the proposed EUR 295.7 billion, this amounts to a reduction of 47%.

2.5 However, the Commission have argued that non-farm rural development spending and other CAP spending not received directly by farmers will now be financed outside of the ringfenced CAP income support amount, through the National and Regional Partnership Fund (NRPF). The actual final amount allocated to CAP expenditure will depend on how Member States allocate their NRPF resources in their NRP plans. Based on spending in the current CAP at circa 8% for non-farm rural development measures (EUR 23.7 billion) and allowing for EUR 6.3 billion under the Unity Safety Net, the total estimated minimum CAP budget for 2028-2034 would be EUR 325.7 billion (EUR 295.7 billion basic + EUR 23.7 billion + EUR 6.3 billion). When compared with the EUR 387.8 billion in the current CAP, this amounts to a 16% budget cut⁶.

2.6 The share of the EU budget going to the CAP has been reduced by 62% over the past 40 years, from 65.5% in 1980 to just under 25% in 2021, while requirements for participating farmers have become ever more extensive and costly⁷.

⁵ [JRC Publications Repository - Scenar 2040.](#)

⁶ [How big will the CAP budget be in the next MFF?](#)

⁷ [OJ C, C/2024/2099, 26.3.2024](#), ELI: <http://data.europa.eu/eli/C/2024/2099/oj>.

- 2.7 Despite successive enlargements, overall CAP funding as a share of GDP has decreased significantly from 0.66% at its highest in 1993 to as low as 0.29% in 2024⁸. The EESC is calling on the EU to restore the CAP budget to a level of 0.5% of EU GDP in the next MFF 2028-2034.
- 2.8 The world will need 70% more food, as measured by calories, to feed a global population of 9.6 billion by 2050 and must produce this in a more sustainable way⁹, but every year the world loses 12 million hectares of productive land¹⁰. Europe and its citizens need a strong CAP policy, with a strong CAP budget supporting an economically, socially and environmentally sustainable farming sector, operating to high standards of production and guaranteeing secure, safe and high-quality food at affordable prices¹¹.
- 2.9 Food security and strategic autonomy are core elements of European defence policy and maintaining productive capacity in all regions, especially border areas, is a matter of resilience and security. The EESC highlights the need for the EU to recognise the risk and support Member States located along the EU's eastern external border, which face higher food-security, logistics and geopolitical risks.
- 2.10 The EESC welcomes the Commission's proposal to index-link MFF and CAP payments in the future to take account of inflation and insists that CAP farm payments must be linked to such indexation.
- 2.11 The EESC also welcomes the proposal from the Commission to provide a Unity Safety Net for market disturbance with a specific budget of EUR 6.3 billion. However, the EESC is clear that this proposal cannot be used as a backstop to try and justify trade deals which will undermine the EU agricultural markets, such as the Mercosur deal.

Arguments in support of recommendation 1.9

- 2.12 Reciprocity is a fundamental precondition for ensuring a level playing field. As European farmers are required to make stricter commitments on environmental sustainability, animal welfare, food safety and labour rights, the EU must provide for measures that reward the production of these public goods and safeguard the sustainability of the EU agri-food system. In addition, the EU must provide safeguard mechanisms, financed outside the CAP budget, which protect EU producers and products from the risk of being penalised on the markets compared to products from countries with significantly lower standards.

Arguments in support of recommendation 1.10

- 2.13 Proposals to move away from a common policy and towards a policy based on national recommendations will lead to the re-nationalisation of the CAP and distortions of the single

⁸ [CAP expenditure in the total EU expenditure.](#)

⁹ [World must sustainably produce 70 per cent more food by mid-century – UN report.](#)

¹⁰ [Every Year, 12 Million Hectares of Productive Land Lost, Secretary-General Tells Desertification Forum, Calls for Scaled-up Restoration Efforts, Smart Policies.](#)

¹¹ [OJ C 62, 15.2.2019, p. 214.](#)

market. They will also delegate the responsibility of defining, encouraging, funding and monitoring compliance with ecological practices, potentially reducing ambition, fragmenting efforts and losing an opportunity to align the CAP with other EU environmental policies.

Arguments in support of recommendation 1.12

- 2.14 Reallocating EU funding under the proposed National and Regional Partnership Fund undermines the CAP in terms of protecting EU food security and weakens the single market, as well as rural areas and the financial viability of farmers and rural actors. The EESC recognises the move on the new rural target rule but considers 10% to be way too low and is insisting that the two pillar model of CAP is retained.

Arguments in support of recommendation 1.13

- 2.15 Dedicated income supports, based on area-based payments, should be retained and paid to genuine active farmers engaged in food and agricultural production and the provision of public goods, including part-time farmers. Direct payments must not be available to those who just own land but are not actively involved in agricultural production and do not deliver public goods¹². The Commission should bring forward a clear definition of an active farmer based on objective criteria, which is fair and in line with the European model of farming, taking into account the most vulnerable farmers and subsistence and semi-subsistence farmers.

Arguments in support of recommendation 1.14, 1.15

- 2.16 Lessons from the impact of convergence on farm viability in previous CAP reforms must be taken on board. Further degressivity will erode farm income and undermine the number of viable producers. The EESC rejects the Commission's concept and proposal of using degressive cuts to farm payments for some groups of farmers to finance payments to other groups of farmers. Increasing direct payments to young farmers and farmers on low incomes is absolutely essential but must be provided for in an increased CAP budget. Any proposals involving redistribution must be fair and not damage farm income or undermine the viability of capital-intensive sectors such as dairy, beef or arable production, and should only be considered following an independent evaluation of area-based payments at Member State level.

Arguments in support of recommendation 1.16

- 2.17 Farmers face unique challenges in terms of pensions because of lower incomes, generational renewal issues and cultural attitudes towards retirement. The average age of a European farmer is 57 years. Only one in ten young farmers are less than 40 years old (EU definition of young farmer)¹³. Farmers' incomes are around 40% lower than the average non-agricultural income¹⁴. It would have a very damaging impact on a very large number of older farmers if the Commission

¹² [OJ C 283, 10.8.2018, p. 69.](#)

¹³ [Exchange on Advancing Young and Historically Underserved Farmers and Addressing Intergenerational Farm Issues.](#)

¹⁴ [OJ C, C/2024/4063, 12.7.2024, ELI: <http://data.europa.eu/eli/C/2024/4063/oj>.](#)

were to implement the proposal to cease area-based income support to farmers who reach retirement age by 2032 without guaranteeing them that they will receive full compensation. The number of farms is constantly decreasing in the EU, from circa 15 million in 2003 to 9.1 million in 2020, a reduction of 39%¹⁵.

Arguments in support of recommendation 1.18

2.18 Agri-environmental and climate actions require a sufficient budget to support farmers to engage in a transition towards sustainable farming systems and to reward those already engaged in such systems – in particular, organic farming, which has delivered many environmental benefits while being a cornerstone of the vitality of rural communities. There must be sufficient budget attached to both the maintenance of organic farming and conversion: Member States should allocate at least the same budget as in the previous CAP, proportional to current developments and ambitions at national levels.

Arguments in support of recommendation 1.19

2.19 There needs to be a sustainable budget for LEADER to drive bottom-up, community-led investment to increase the complementarity between rural and urban areas, support female entrepreneurship, create and sustain employment in rural areas, provide funding in the rural environment and support climate change mitigation initiatives in rural communities.

2.20 The measure has the key function of ensuring that knowledge and innovation actually reach male and female farmers through advice, training and exchange networks. Placing AKIS outside the ringfence reduces the legal and financial certainty of such interventions and risks hampering the modernisation of agricultural enterprises and their ability to contribute to the EU's strategic priorities.

Arguments in support of recommendation 1.21

2.21 Longer-term trends of inherently low farm incomes, volatile producer prices, extreme weather-related crises and a diluted and weaker common market organisation have exposed structural problems in the EU food and agricultural policy as well as EU food security and sovereignty, which must be addressed in the CAP reform 2028-2034¹⁶.

2.22 The EESC has put forward detailed proposals on strengthening farmers' position in the food supply chain and supporting farm incomes in times of crisis within the CAP framework, including insurance schemes against climate and environmental disasters and market tensions, risk and crisis management tools, market volatility measures, financial tools, tools for improving farmers' bargaining power, extending UTPs and a ban on below-cost selling, collective price negotiations

¹⁵ [OJ C, C/2024/2099, 26.3.2024, ELI: http://data.europa.eu/eli/C/2024/2099/oj](http://data.europa.eu/eli/C/2024/2099/oj).

¹⁶ [OJ C, C/2025/117, 10.1.2025, ELI: http://data.europa.eu/eli/C/2025/117/oj](http://data.europa.eu/eli/C/2025/117/oj).

and more support for cooperatives and producer organisations, alongside the consolidation of workers' rights, collective bargaining and social dialogue¹⁷.

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1 – Article 1, second paragraph

linked to recommendations 1.1, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.12

Text proposed by the European Commission	EESC amendment
(...) This Union support shall be provided under the <i>National and Regional Partnership Fund (the ‘Fund’)</i> in accordance with the rules governing that Fund laid down in Regulation (EU) [...] [NRP].	(...) This Union support shall be provided under the <i>current EAGF and EAFRD funding model. A dedicated part shall be reserved for rural development interventions, including LEADER/CLLD and locally led strategies including smart villages, with a distinct budget line ensuring visibility, continuity and non-transferability of funds to other policy areas.</i>

Reason
<p>The current EAGF and EAFRD CAP funding model should be retained with targeted income support and eco-scheme payments provided to active farmers through Pillar 1, supplemented by additional dedicated sector-specific support for vulnerable sectors, as well as for rural development and climate- and environmentally friendly agriculture through Pillar 2.</p> <p>Reallocating EU funding under the proposed National and Regional Partnership Fund undermines the CAP in terms of protecting EU food security, weakens the single market, erodes rural areas and the financial viability of farmers.</p> <p>Without a CAP Pillar 2, rural development risks being lost in the wider cohesion envelopes. This amendment guarantees a standalone, ringfenced rural development envelope, preserving the identity and continuity of LEADER while recognising that vibrant rural areas are a foundation of food security, farming viability and community well-being.</p>

Amendment 2 – Article 2

linked to recommendations 1.1, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.12, 1.20

Text proposed by the European Commission	EESC amendment
<p>CAP national recommendations and steering</p> <p>1. The Commission shall adopt CAP <i>national</i> recommendations providing guidance (...)</p> <p>(b) improvement of attractiveness of the profession and foster generational renewal;</p>	<p>CAP recommendations and steering</p> <p>1. The Commission shall adopt CAP recommendations providing guidance (...)</p> <p>(b) improvement of attractiveness of the profession and foster generational renewal <i>with tailored measures for young and new farmers, women and rural youth;</i></p>

¹⁷ OJ C, C/2025/2016, 30.4.2025, ELI: <http://data.europa.eu/eli/C/2025/2016/oj>.

2. The Commission shall base the CAP national recommendations (...) as well as food security in each Member State .	2. The Commission shall base the CAP recommendations (...) as well as food security in the EU .
3. In the CAP national recommendations, (...) addressed by each Member State (...)	3. In the CAP recommendations, (...) addressed by the EU (...)

Reason
The proposals on CAP national recommendations and steering will lead to a re-nationalisation of the CAP and erosion of the single market. Generational renewal requires specific support for groups most affected by access barriers.

Amendment 3 – Article 3

linked to recommendation 1.13

Text proposed by the European Commission	EESC amendment
3. (...) Acts implementing directives may however not have the purpose or effect of an exemption of farmers or other beneficiaries from the statutory management requirements listed in Annex I, Parts A and B.	3. (...) Acts implementing directives may however not have the purpose or effect of an exemption of farmers from the statutory management requirements listed in Annex I, Parts A and B.
4. (...) by farmers and other beneficiaries receiving the support referred to in paragraph 2	4. (...) by farmers receiving the support referred to in paragraph 2 (...)
5 (...) farmers and other beneficiaries subject to the practice and a summary of the protective practice. In setting the protective practices, Member States shall take utmost account of the CAP national recommendations referred to in Article 2 .	5. (...) farmers subject to the practice and a summary of the protective practice. In setting the protective practices, Member States shall take utmost account of the European recommendations .
8. (...) where weather conditions prevent farmers and other beneficiaries from implementing those practices (...)	8. (...) where weather conditions prevent farmers from implementing those practices (...)

Reason
This approach is consistent with the intention of the regulation to target the distribution of resources more effectively and avoid overlaps.

Amendment 4 – Article 4

linked to recommendation 1.18

Text proposed by the European Commission	EESC amendment
1. Member States shall provide support to farmers and other beneficiaries at least in each of the following environmental and climate priority areas: (...)	1. Member States shall provide support to farmers in the following environmental and climate priority areas: (...)

Member States with areas affected by water pollution due to nitrate surplus shall provide support to farmers for extensification of livestock systems or for diversification to other agricultural activities.	Member States with areas affected by water pollution due to nitrate surplus shall provide support to farmers for extensification of livestock systems or for diversification to other agricultural activities <i>or other alternatives, with special measures for predominantly grassland-based production systems and high-nature-value areas without compromising farm viability or regional livestock density balance.</i>
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Reason
Climate and environmental action should be achieved through a balanced approach of incentives and regulation. Therefore, more budget should be available for these incentives to be successful. Many grassland-based livestock systems already operate under low-intensity and environmentally beneficial conditions, providing carbon sequestration, biodiversity and landscape maintenance services. Imposing further mandatory extensification could unintentionally reduce production capacity, increase the risk of abandonment and weaken rural economies, without proportionate environmental benefit. Specific measures for predominantly grassland-based systems should be included, allowing Member States to tailor interventions to regional conditions and production structure.

Amendment 5 – Article 5

linked to recommendations 1.14, 1.15

Text proposed by the European Commission	EESC amendment
The following CAP interventions are set out: (a) <i>degressive</i> area-based income support	The following CAP interventions are set out: (a) area-based income support

Reason
See recommendations 1.14, 1.15

Amendment 6 – Article 6

linked to recommendations 1.4, 1.13, 1.14, 1.15

Text proposed by the European Commission	EESC amendment
<i>Degressive</i> area-based income support 2. The payment per eligible hectare shall be <i>differentiated by groups of farmers or geographical areas, on the basis of objective and non-discriminatory criteria. The groups of farmers or geographical areas that are the basis of differentiation of payments shall be established based on farmers' income from agricultural activity in a representative reference period.</i>	Area based income support 2. The payment per eligible hectare shall be <i>calculated on a national basis in line with the criteria used in the CAP from 2020 to 2026.</i>

<p>3. The total amount of payments established <i>in accordance with paragraph 2 shall be degressive</i> (...).</p> <p>5. The Member States shall ensure that the support under this Article is primarily directed towards <i>farmers who exercise an agricultural activity on their holding</i> (...).</p> <p>6. Member States shall <i>ensure that at the latest by 2030 the applicants who reach the retirement age, determined by national law, and who receive a retirement pension, no longer receive support under this Article.</i></p>	<p>3. The total amount of payments <i>per farmer</i> established <i>under the CAP 2023-2027 shall be the base amount for the CAP 2028-2032 and payments shall be index-linked based on EU inflation each year.</i></p> <p>5. The Member States shall ensure that the support under this Article is primarily directed towards <i>genuine active farmers engaged in agricultural production.</i></p> <p>6. Member States shall <i>not discriminate against genuine active farmers based on old age or pension status but shall rather incentivise targeted financial schemes to facilitate the transfer of the farm ownership from older farmers and pensioned farmers to young farmers.</i></p>
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Amendment 7 – Article 7(1), third paragraph

Text proposed by the European Commission	EESC amendment
The annual payment for each small farmer shall not exceed EUR 3 000 .	The annual payment for each small farmer shall not exceed EUR 5 000 .

Reason
In line with previous EESC recommendations (NAT/955) ¹⁸ .

Amendment 8 – Article 8

linked to recommendations 1.4, 1.12, 1.18

Text proposed by the European Commission	EESC amendment
<p>2. The payment for areas with natural and other specific constraints may be provided in respect of areas that:</p> <p>(b) are newly designated in view of specific constraints defined by Member States and have been included in the <i>NRP</i> Plan.</p> <p>Member States may carry out fine tuning with the purpose of excluding areas (...)</p> <p>The surface of the areas (...) shall not exceed 2% of the utilised agricultural area of the Member State concerned.</p>	<p>2. The payment for areas with natural and other specific constraints may be provided in respect of areas that:</p> <p>(b) are newly designated in view of specific constraints defined by Member States and have been included in the <i>National Rural Development Plan</i>.</p> <p>Member States may carry out fine tuning with the purpose of <i>including new areas or</i> excluding <i>existing</i> areas (...)</p> <p>The surface of the areas (...) shall not exceed 5% of the utilised agricultural area of the Member State concerned.</p>

¹⁸ OJ C, C/2026/38, 16.1.2026, ELI: <http://data.europa.eu/eli/C/2026/38/oj>.

3. The payments per eligible hectare shall be limited to the additional costs or loss of income related to undertaking agricultural production in the designated area compared to production in non-designated areas.	3. The payments per eligible hectare shall not be limited to the additional costs or loss of income related to undertaking agricultural production in the designated area compared to production in non-designated areas but shall include an incentive element.
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Reason
The maintenance of areas with natural constraints is essential to ensure the viability of farming in less-favoured regions. The payments must include an incentive element for farmers.

Amendment 9 – Article 10

linked to recommendations 1.13, 1.18

Text proposed by the European Commission	EESC amendment
1. Member States shall provide incentives (...) (a) voluntary management commitments taken up by farmers and other beneficiaries,	1. Member States shall provide additional direct payment incentives that significantly exceed the additional costs and lost income incurred by farmers (...) (a) voluntary management commitments taken up by farmers,

Reason
Agri-environmental and climate actions should be designed to be inclusive, accessible and attractive to all types of farmers, regardless of farm size, region or production system. A menu-based approach allows farmers to choose from a range of measures that suit their local conditions and capacity. This flexibility increases uptake and ensures more effective environmental outcomes. A well-designed menu system also supports fairness, simplicity and adaptability across diverse agricultural contexts. It is essential to create a real incentive for farmers to make the transition.

Amendment 10 – Article 11(1), first paragraph

linked to recommendations 1.13, 1.15

Text proposed by the European Commission	EESC amendment
1. (...) or to specific types of farming therein, which undergo difficulties and are important for (...).	1. (...) or to specific types of farming therein, which undergo income or other difficulties and are important for (...).

Reason
Direct payment needs to be focused on improving farm incomes.

Amendment 11 – Article 12(2), second paragraph

linked to recommendation 1.21

Text proposed by the European Commission	EESC amendment
<i>For permanent crops and in other justified cases for which</i> the calculation methods referred to in the first subparagraph are not appropriate, Member States may provide for a method for calculation of the losses based on the average annual production or income of the farmer over a period that does not exceed eight years, excluding the highest and lowest entry.	<i>When</i> the calculation methods referred to in the first subparagraph are not appropriate, Member States may provide for a method for calculation of the losses based on the average annual production or income of the farmer over a period that does not exceed eight years, excluding the highest and lowest entry.

Reason
Calculating the Olympic average over eight years provides greater statistical stability, as climate hazards are very frequent.

Amendment 12 – Article 14(4)

linked to recommendation 1.20

Text proposed by the European Commission	EESC amendment
Member States shall grant support in the form of lump sums or financial instruments or a combination of both. Support shall be limited to the maximum amount of aid of EUR 300 000 and may be differentiated in accordance with objective and non-discriminatory criteria.	Member States shall grant support in the form of lump sums or financial instruments or a combination of both. Support shall be limited to the maximum amount of aid of EUR 300 000 and may be differentiated in accordance with objective and non-discriminatory criteria. <i>Member States shall ensure that a dedicated share of this support is ringfenced for young farmers and women, in line with their generational renewal strategy.</i>

Reason
An allocation specific to young people and women ensures that the CAP delivers on its core promise of generational renewal, keeps farming attractive to young people and women and supports rural community vitality.

Amendment 13 – Article 15, new letter (e)

linked to recommendation 1.20

Text proposed by the European Commission	EESC amendment
	<i>(e) quantitative targets offering a realistic and honest assessment of the sector's future, e.g. how many new farmers the EU intends to be established, what support mechanisms will be</i>

	<i>mobilised and how the value is expected to be distributed across the supply chain.</i>
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Reason
A coherent vision from the EU institutions, backed by clear figures and timelines, is essential to build trust and ensure that the younger generation can make informed decisions about entering and investing in farming.

Amendment 14 – Article 16(1)

linked to recommendations 1.13, 1.14, 1.15, 1.16

Text proposed by the European Commission	EESC amendment
(b) <i>degressive</i> area-based income support...	(b) area-based income support...

Reason
See recommendations 1.13, 1.14, 1.15 and 1.16.

Amendment 15 – Article 17

Text proposed by the European Commission	EESC amendment
1. Member States may provide support for the farm relief services, allowing farmers to take a leave for sickness, childbearing, care for children and other family members, holidays and similar life events, as well as participation in trainings, as further specified in their NRP Plans.	1. Member States may provide support for the farm relief services, allowing farmers to take a leave for sickness, childbearing, care for children and other family members, holidays and similar life events, <i>mental health recovery</i> , as well as participation in trainings, as further specified in their NRP Plans.

Reason
Rural youth organisations consistently highlight stress and mental health as a barrier to staying in farming.

Amendment 16 – Article 18

linked to recommendation 1.19

Text proposed by the European Commission	EESC amendment
4. Support provided from LEADER shall be focused on rural development fields with added value for farmers and forest holders, such as social, environmental, digital and economic transformation of rural areas, improvement of well-being of rural citizens, strengthening social capital.	4. Support provided from LEADER shall be focused on rural development fields with added value for farmers and forest holders, such as social, environmental, digital and economic transformation of rural areas, improvement of well-being of rural citizens, strengthening social capital, <i>and fostering the inclusion and participation of young people and women in decision-making.</i>

Reason
It is important to explicitly highlight the need for youth participation in decision-making.

Amendment 17 – Article 20, point 3

linked to recommendation 1.19

Text proposed by the European Commission	EESC amendment
(b) targeted advice for young farmers, in particular as regards business management, access to finance, access to public support, access to knowledge and innovation.	(b) targeted advice for young farmers, in particular as regards business management, access to finance, access to public support, access to knowledge and innovation, <i>succession planning and digital and green skills such as vocational training for organic farming.</i>

Reason
Digitalisation and the green transition are at the core of the CAP's objectives. Explicitly mentioning digital and green skills ensures farmers are not left behind in these transformations. Succession planning is among the main barriers to entering agriculture across Member States.

Brussels, 22 January 2026.

The president of the of the European Economic and Social Committee
 Séamus BOLAND
