



POR
OTRA
PAC

Towards a fairer CAP post-2027

**15 measures to achieve a fair and transformative
Common Agricultural Policy for the agri-food sector,
consumers, and rural areas**

A. Introduction

On 16 July 2025, the European Commission published its proposal regarding the Common Agricultural Policy (CAP) for the next budgetary period, from 2028 to 2034. Among the most significant announcements is a roughly 20% reduction in the annual budget compared to the current one. Additionally, the text proposes ending the traditional structure of the regulation. It would not only eliminate its two pillars—which leaves rural development subsidies in limbo—but would also cease to be a single framework for agri-rural issues and incorporate it into a broader one, the "Sustainable Security and Prosperity Fund."

The Commission's proposal raises doubts about how the governance of the future CAP will be organized. On one hand, there is uncertainty about the greater weight of Member States: the broad margin of maneuver they will have could lead to a loss of common objectives and foster *de facto* renationalization of the CAP. The role that civil society will play is also undefined. A proposal characterized by the absence of a specific prior consultation process on the CAP does not contribute to security and participation. Nor does the lack of transparency in decision-making, toward society and the co-legislators themselves.

Regarding the protection of the environment—the basis of the productivity and health of the agri-food sector—there are dissonant elements. On one hand, the EC's proposal would stop guaranteeing a specific budgetary allocation for environmental and climate payments within the CAP. Also, conditionality would be completely diluted: renamed as Farm Stewardship, this allocation for agro-environmental management includes mandatory good practices for the environment and climate to receive payments but lacks real ambition.

It is also regrettable that the European Commission does not take advantage of the reformulation to improve the application of social conditionality, especially when we see cases of rights violations in some sectors. Nor does it clearly commit to promoting gender equality in the countryside.

On the contrary, the proposed future CAP also brings positive measures, such as ring-fencing funds for the incomes of farmers. It also partially promotes a more equitable distribution of aid to protect smaller and family farms; and intends to reduce their bureaucratic burden, a clear demand from the sector that needed to be addressed. It also proposes a firmer commitment to generational renewal and, although perhaps more anecdotally, includes new elements of interest, such as mental health care of producers.

However, most of the above presents a worrying situation: the future CAP as proposed is clearly insufficient to support farms in their transition to

sustainability. It ignores the scientific consensus and repeated warnings from the Strategic Dialogue on the future of EU agriculture and those who work the land and care for livestock. All these qualified voices warn of the increasingly accentuated deterioration of the environment and the climate crisis, which compromise agricultural productivity, food security, and empty the countryside.

Over the coming months, the EC's proposal will be debated and refined by the European Parliament and the Council of the EU. The more than fifty entities that make up the Coalición Por Otra PAC have developed 15 key measures that these European institutions should incorporate into the negotiations. The objective is to strengthen advances in equity for those who live and work in rural areas and prioritize the protection of natural assets as the basis of agricultural production, the well-being of our communities, and public health, ensuring fair and common playing conditions for all producers in the EU. A fair, solidarity-based CAP aligned with the agroecological transition is not only possible, but essential.

B. Analysis of the Commission's proposal compared to the current CAP

1. A timid step forward toward social justice

- Repatriation of payments: The current CAP, with its hectare-based payment system mainly benefits larger farms¹. As a result, these concentrate most of the subsidies to the detriment of small and medium-sized ones, which need them most. In 2023, 20% of beneficiaries still receive 80% of direct payments at the European level, and 74% in the Spanish case². This contributes to the disappearance of 5.3 million agricultural holdings in the EU between 2005 and 2020, 87% of which were less than 5 hectares. Spain lost 74,925 holdings between 2009 and 2020... The current CAP incorporates tools that limit payments to larger farms such as capping (limiting payments up to 100,000 euros per farm) and payment degressivity (gradual reduction of CAP payments from 60,000 euros per farm). But 19 Member States still do not apply the first tool, and only six have implemented the second one³. Spain has included these tools in its Strategic Plan for the Common Agricultural Policy (PEPAC), which, although its design is improvable, contributes to the objective of redistributing payments.

¹ [European Court of Auditors \(2018, p.11\)](#)

² [European Commission \(2025, p.9\)](#)

³ [European Parliament \(2023, p.31\)](#)

Regarding social conditionality as implemented in the CAP, it lacks ambition to cover all existing payments. In the current framework, only direct payments and some second pillar payments are conditioned on compliance with social conditionality, leaving out payments specifically for sectors like vegetables and fruits that are exempt from its requirements.

The EC's proposal does not allow a comprehensive reform of the basic hectare payment architecture. We consider it essential that this instrument incorporates support criteria targeted at those who need it most and integrates more ambitious environmental requirements. In the meantime, we positively value that the EC proposes mandatory application in all Member States of degressivity from 20,000 euros and capping above 100,000 euros. However, we are concerned that the proposal does not address the implementation of a redistributive payment. This complementary payment to the Basic Income Support for Sustainability (BISS) is granted to the first hectares of each agricultural holding, aiming to favor smaller and medium-sized ones, and it does exist in the current CAP. The European Commission's proposal also does not improve the current social conditionality requirements.

- Historical entitlements: In the particular case of Spain, many farms still receive a payment amount based on the payment assigned to their land according to its production in the early 2000s. This historical entitlements (*derechos históricos*) system is a source of inequalities that favors the most intensive ones, which already benefit from economies of scale over those with greater social and environmental value. This model can create situations as unfair as the following: in the same province like Cáceres, irrigated crops receive 1,234 euros per hectare of basic payment, while a dryland farm only receives 82 euros per hectare (RD 1048/2022, Annex IX).

The European executive's proposal goes in the right direction by proposing that the average payment envisaged per hectare for income support based on area with degressivity will not be less than 130 euros nor more than 240 euros for each Member State. It could be an opportunity to phase out of the historical entitlements.

- Gender equality and generational renewal: In the European Union, women farmers receive, on average, one-third less income than their male counterparts⁴. In Spain, this inequality is also reflected in access to CAP payment, where women represent 37.4% of those receiving direct payments, but only collect 27% of the total of these payments. Despite these inequalities, only four countries in the EU, including Spain, have introduced specific measures in the current CAP to financially support women to join as farmers⁵.

Regarding generational renewal, there are some payments within the current CAP to support the youngest in this difficult context.

The European Commission's proposal includes specific payment for the establishment of young people and requires Member States to implement a generational renewal strategy in their strategic plans, but does not incorporate any specific measure to support women in the countryside.

2. Lack of ambition to adapt the agri-food model to environmental and climate crises, putting the sector's viability and food security at risk

"Member States have overwhelmingly favored economic objectives to the detriment of environmental ones, with the result that the climate and environmental ambition of their respective Strategic Plans is, generally, low", conclude researchers who presented a report on the current CAP to the European Parliament in early 2025⁶. One would expect the proposal to correct this situation. However, the changes go exactly in the opposite direction.

- Environmental conditionality: Conditionality is a system that links the receipt of current CAP payment to farmers with compliance with a series of rules and requirements related to the environment, food safety, animal welfare, and maintenance of agricultural land. It is a key element for farms to adapt and mitigate climate change. Some of the flagship practices of conditionality are crop rotation; dedication of a minimum percentage of arable land to non-productive surfaces and elements such as fallows, plant covers; limitation of tillage; and stubble burning, among others. Although several have been watered down in the 2024 reform, all

⁴ [European Commission \(2023, p.3\)](#)

⁵ [European Commission \(2023, p.91\)](#)

⁶ [Guyomard H. \(2024, p.10\)](#)

allow improving soil carbon content and increasing its productivity, and contribute to stopping erosion, according to an impact study conducted by the European Commission in 2021⁷. Additionally, they enable the recovery of other basic ecosystem services for food production, such as biological control and pollination.

The Commission proposes replacing the current environmental conditionality with a looser system called *Farm Stewardship*. If approved as is, it would eliminate key requirements for soil protection, such as the mandatory implementation of plant covers or sustainable tillage techniques, and would grant Member States full freedom to decide whether to apply these measures or not. This absence of clear common rules at EU level would prevent guaranteeing equitable conditions in all countries.

- **Environmental payments**: Currently, 35% of second pillar funds must be allocated to interventions related to climate change adaptation and mitigation, promotion of efficient management of natural resources, and recovery of lost biodiversity. On the other hand, 25% of first pillar direct payments are allocated to eco-schemes. Although their design is imperfect, it is crucial that part of the CAP budget is allocated to measures that promote practices that improve the soil and contribute to conserving biodiversity, such as extensive livestock farming.

These payments allow, among other things, to produce healthy and quality food, which is one of the specific objectives of the current CAP.

In its proposal, the European Commission does not propose at any time to ring-fence part of the CAP budget for this type of measures. This stance by the European executive is worrying and not up to the triple planetary crisis facing the sector. Additionally, the Commission's text does not propose specific measures to ensure easy access for consumers to healthy and sustainable products.

From the analysis we have elaborated, it is evident that while the Commission's proposal partially advances toward a more equitable distribution of payment, it lacks agro-environmental ambition and sidelines the fight against gender inequalities in the agricultural sector.

⁷ [European Commission \(2021, p.55 y p.83\)](#)

To correct these shortcomings and achieve a truly fair and sustainable CAP, we present our 15 key demands.

Our 15 main demands regarding the negotiations on the future CAP 2028-2034

Measures for economic sustainability

1. **Do not reduce the CAP budget** and ensure that its objectives and provisions remain common at the European level to avoid social and environmental dumping and allow all Member States to play with the same cards.
2. Redirect subsidies to **those who need it most** and provide benefits to society and the territory, such as **farms with high environmental and social value**, those developed in environmental protection areas, and extensive livestock farming. The objective is to implement real income support.
3. **Limit payments to large recipients and progressively reduce payments per hectare** (which favors large farms and does not include sufficient environmental requirements), maintain the redistributive payment, and mandatorily apply capping and degressivity.
4. Eliminate payments based on **historical entitlements** as they perpetuate inequalities in the countryside.
5. End **perverse subsidies** that contribute to the overexploitation of natural resources and environmental pollution.

Measures for social sustainability

6. Greater and better support for **young people** to ensure generational renewal.
7. Grant specific and tailored public support to the needs of **rural women** and distribute CAP payments taking into account **gender inequalities**.
8. Improve **social conditionality** that guarantees decent labor rights and extend it to all CAP payments.
9. Simplify **bureaucracy** without lowering social and environmental ambition avoiding farms having to justify the same data to different administrations.
10. Require **participatory and transparent governance** that involves all territorial levels (regional and national) in decision-making and includes environmental and public health interests.

Measures for environmental sustainability

11. Strengthen **environmental conditionality**. Receipt of public funds must

be linked to promoting a truly sustainable agri-food system, which necessarily involves preserving the environment and animal welfare as the basis of production and human health, and adapting the sector to climate change.

12. Allocate at least **50% of CAP subsidies to adapt farms to the triple environmental crisis**: climate, biodiversity loss, and pollution. Also to minimize the impact of agriculture and livestock farming on them, thus contributing to the sector being an agent of change.
13. Accompany the **ecological transition** with continuous and quality public advice to farms to adopt sustainable practices.
14. Define clear, ambitious objectives with sufficient budget to **promote sustainable food systems** that guarantee healthy, quality, and affordable food for everyone. Specify clear objectives on food and health to promote the production of healthy and good quality food.
15. Provide mechanisms for the CAP to incorporate objectives from **other policies and environmental tools** that are yet to be approved. Complement the future policy with all possible tools, such as favorable environmental taxation for organic food, which ultimately allow us to achieve food and nutritional sovereignty and security.



Coalición PorOtraPAC
www.porotrapac.org

Contacto

Elvira del Pozo Campos
prensa@porotrapac.org

Maxime Orhon
politicas@porotrapac.org