

CAP post 2027 - an opportunity to answer citizens' demands and support farming beyond pesticides

PAN Europe

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In July 2025, the Commission proposed the long-term budget (multi-annual financial framework (MMF)) for 2028–2034, which includes the Common Agricultural Policy (CAP). [1] Rather than effectively supporting farmers to transition to future-proof farming, the post 2027 CAP proposal represents a major setback in the need level playing field for EU farming rules. Providing excessive flexibility to member states, will very likely drive a race to the bottom. The CAP, currently representing about a third of the EU budget (€378.5 billion), should urgently stop subsidising farming practices with detrimental impact on our environment and health. Continuing irresponsible spending of citizens' money, undermines the social acceptability and legitimacy of the CAP. Remarkably, the proposal neglects Citizens' demands expressed by European Citizens' Initiatives, asking for the phase out of pesticides, and to support farmers in this transition. Also the Conference for the Future of Europe, through which citizens asked to reduce pesticides and reorient public subsidies to the transition to sustainable agricultural practices, is disregarded. [2] Many of the key outcomes of the Strategic Dialogue on the future of EU Agriculture, are set aside by the CAP proposal. [3] This while the Commission initiated the Strategic Dialogue, and stated the outcome report would be the foundation for the development of a new vision for food and farming in Europe [4]. **The fact that the Commission repeatedly disregards outcomes of the its own participatory processes, undermines its credibility. The CAP negotiations provide a key opportunity to change course, answer citizens' demands and create the supportive framework to shift to future-proof farming. We recommend the EU Parliament and Council to transform this proposal into an instrument which provides a truly sustainable future to farmers, while protecting our soils, water, biodiversity, long-term food security and health.**

What is needed?

- **Urgently phase out direct area-based payments, and stop the funding of harmful practices**, including farming practices using pesticides, with the exception of:
 - the use of low-risk natural substances, as last resort within a fully IPM based system
 - during a transition period towards effective, result-based pesticide phase out, within an IPM based system

Practices making use of Candidates for Substitution, PFAS pesticides and other particularly

harmful pesticides should never be eligible for support.

- **A thorough impact assessment** needs to be carried out, which incorporates the impacts on environment, biodiversity, climate and health, expected by the deregulation of the current CAP and the proposal for the CAP post 2027. The Commission's deregulations of the CAP in 2024 and 2025 go against the better regulations guidelines, and fail the EU's legal principles on transparency, consultations and evidence-based decision-making. The European Commission has to live up to its duty towards EU citizens, rather than undermining the credibility of its governance.
- **Ensure the CAP is fully linked to the full implementation of the Pesticide Regulation (EC) No 1107/2009, as well as Directive 2009/128/EC on the Sustainable Use of Pesticides (SUD)**
- **The Statutory Mandatory Requirements (SMRs) should include the key references of Regulation 1107/2009 and the SUD**, notably on:
 - the legal obligation to apply Integrated Pest Management (article 14 of the SUD, article 55 of Regulation 1107/2009)
 - the legal obligations on the protection of water bodies, nature protected areas and the general public from pesticides (article 11 and 12 of the SUD)
 - the legal obligations on the electronic registration of pesticide use (article 67 of Regulation 1107/2009 and Article 1(1),(2), Article 2 and Article 3 first sentence, Article 4 of implementing regulation (EU) 2023/564)
- **Strengthen the conditions under the new Farm Stewardship approach.** Ensure effective protection, restoration and expansion of biodiversity and landscape features, permanent grasslands and wetlands.
- **Ensure that the spending on environment and climate objectives and farm-level transition actions is ring-fenced and increased significantly.** In order to obtain the support of the general public, the exact purpose of the CAP should be to support farmers during the transition to sustainable practices, including the phase out of pesticides, and to support public goods. Ensuring a minimum of 10% high diversity landscape features on agricultural land, is essential to effectively restore ecosystem functioning in agricultural areas.
- **Link environmental payments and support for farm-level transitions to robust, performance-based indicators.** These indicators should include scientifically sound pesticide use and risk indicators, to effectively monitor progress towards pesticide reduction. Evidently, the performance framework should include the indicators of the Nature Restoration Law (farmland bird index, grassland butterfly index, share of agricultural land with high-diversity landscape features, pollinator index). Transition plans should involve the shift to agroecological, organic and other restorative practices, which are based on restoration and regeneration of soil health, water quality, ecosystem functioning and biodiversity. Support to farm-level transitions should only be granted if the transition includes the result-based ambitious reduction of pesticide use and risk, aiming for a phase out or absolute minimisation. The plans should be motivated by independent, high level expertise on IPM and agro-ecological practices.
- **Carry out a sustainability benchmarking** analysis, which includes robust indicators on pesticide use and risk, to effectively identify best available practices in different pedoclimatic conditions. IPM legally requires the use of the practices and products with the lowest risk to human health and the environment, and least possible disruption to agroecosystems. Sustainability benchmarking should contribute to identifying the targets and basis for performance-based financial support systems.

- **The CAP should prioritise the wide-scale availability of independent, high expertise advice** on IPM and agro-ecological practices, with focus on ambitious reduction of pesticide use and risk, the restoration of soil health and water quality, water buffering. The lack of sound, scientific advice on IPM and agro-ecological practices are one of the main challenges expressed by farmers.

Putting off the needed shift once more, will only exacerbate current problems, for all EU citizens, not in the least farmers. The health, environmental, biodiversity and climate crises are alarming. Exposure to chemicals is one of the main causes of the sharp increase in cancers among young citizens. Pesticides are one of the most important causes of the staggering collapse of biodiversity and the pollution crisis. They undermine ecosystem functions while harming human health. [5] Ambitiously reducing pesticide use and risk is an urgent necessity for restoring and protecting nature, a healthy environment and thriving and resilient food production systems in Europe. Many farmers in the EU are leading by example, ambitiously reducing or phasing out pesticide use, while maintaining good yields, and often higher profits [6]. It is key and long overdue that policy makers find inspiration in the vision of these farmers, and make the CAP fit-for-purpose to widely upscale their work.

Background: short re-cap

The proposal for CAP post 2027 is in stark contrast to what experts, scientists, citizens and many farmers have been calling for: urgently link CAP funds effectively to environmental objectives and public goods, to ensure the shift to truly ecologically sound practices. [2] [7]

The proposal follows several undemocratic deregulations of the CAP (spring 2024 and 2025), carried out without impact assessment and stakeholder consultation under the false pretence of 'emergency' and 'simplification'. These deregulations show a problematic disregard for science and public interest. [8] The deregulation from 2024 led to an ongoing file at the European Ombudsman, following a complaint by Birdlife Europe and ClientEarth. While still no impact assessment or thorough stakeholder consultation has been carried out, the Commission continues stripping the CAP from environmental ambition. The proposal for CAP post 2027 goes even further, giving member states excessive flexibility in defining environmental conditions, without robust indicators and targets. This would very likely lead to a race to the bottom. It has been shown that member states in general use flexibility to decrease ambition. [9]

The outcome report of the SDA clearly called for:

- better enforcement and implementation of legislation, through translation into clear and actionable on-farm obligations
- reduction of external inputs such as pesticides
- urgent need to transition to sustainable food systems, through ambitious enhancement of sustainable farming practices
- moving away from area-based payments
- result-oriented environmental payments, robust indicators and increased budget for environmental measures
- support for the transition, financially and through dedicated training and independent advisory systems

However, the Commission's Vision for Agriculture and Food showed a dramatically lower ambition, ignoring key recommendations of the SDA. [10] The Commission's CAP proposal unfortunately reflects that, falling severely short, while lacking ambition and science-based foundation. The proposal also includes very few elements which could be promising, in case strengthened.

Key points of the CAP proposal

New structure:

- The proposal moves from the two-pillar structure of agricultural and rural support, to one joined fund of 297 billion Euro. This CAP fund is taken up in the extensive 'National and Regional Partnership' fund.
- Eco-schemes (formerly in pillar I) and Agri-environment and Climate Measures (formerly in pillar II) are joined in Agro-Environment and Climate Actions (AECA).

Problematic:

- No dedicated, ring-fenced budget is foreseen for climate and environment, while the exact purpose of the CAP should be to support the transition to ecologically sound farming systems.
- Conditionality is dramatically weakened under "Farm Stewardship". The Statutory management requirements are maintained, but should be strengthened to include key provisions of pesticide legislation (see above), while the Good Environmental and Agricultural Conditions (GAECs) have been replaced by 'Protective Practices', which will be defined at MS of regional level. The defined objectives of the 'Farm Stewardship' on for example biodiversity, grasslands and landscape protection, are vague.
- Lack of robust indicators and targets to monitor progress and ensure performance-based spending. This would lead to Member States spending citizens' money as they wish, without transparency or true accountability.
- Coupled support (for example, to intensive dairy farming) remains and is made mandatory, while coupling support to certain farming practices/crops leads to harmful and ineffective spending of public funds. Also investments in unsustainable practices remain possible. Although a 'negative list' for investment is included, the list needs thorough improvement for it to be effective.
- Untargeted area-based payments remain, although first steps towards moving away from these payments are made.

Positive:

- Area-based income support is subjected to mandatory capping and degressivity (gradual reduction in area-based income support). Although long overdue and far too limited, this represents a first step towards moving away from 20% of largest farm holdings receiving 80% of the funds. Evidently, direct area-based payments should be phased out.
- Next to the environmental payments, the proposal also includes 'transition actions' to support farmers based on a transition plan to 'resilient production systems'. Member states have to provide schemes that support farmers who want to transition. Such support based on transition plans on farm-level is key, and such structures could play a prominent role in moving to sustainable systems. However, since there is no dedicated budget linked to these transition actions, there is a high threat that they will not be effective. In order for these measures to contribute to the large-scale transition to sustainability needed, adequate dedicated budget is needed. Moreover, the transition plans should be subjected to clear environmental conditions and robust performance-based indicators.

NOTES

- [1] 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
- [2]
- IPSOS Citizens Poll on Pesticides (2023)
 - Citizens' Demands for Pesticide Reduction in Europe
 - Through the ECI 'Save Bees and Farmers', citizens asked again for ambitious pesticide reductions to protect health, environment, biodiversity, long-term food food security and long-term perspective for farmers. Of the 10 successful ECI's that have been submitted to the European Commission, 2 focused on pesticides.
 - The final report of the Conference for the Future of Europe included the need for high environmental ambition in food production systems, and to drastically reduce pesticide use (2022) - Final report - One year after CoFE: where do we stand with the citizens' proposals?
 - The Eurobarometer survey on Food safety in the EU listed pesticide residues in food as the most frequently selected concern related to food safety (2022)
 - EU public consultation on the Common Agricultural Policy: respondents showed a concern for environmental challenges, such as the prevention of biodiversity loss and prevention and reduction of water pollution (pesticides, fertilisers) (2017)
 - More than 1 million citizens asked the European Commission and the Member States for a ban on glyphosate and ambitious pesticide reductions, through a successful ECI, for a ban on glyphosate (2017)
- [3]
- Outcome Report of the Strategic Dialogue on the Future of EU Agriculture
 - Implementation of the outcome of the Strategic Dialogue on Agriculture requires ambitious policy action to reduce pesticides: PAN Europe's Recommendations for the EU Vision for Agriculture and Food
- [4] Statements of the EC on the Strategic Dialogue on the Future of EU Agriculture
- [5]
- Our global food system is the primary driver of biodiversity loss
 - Europe's state of water 2024: the need for improved water resilience, EEA, 2024
 - More than 75 percent decrease in total flying insect biomass over 27 years
 - Direct pesticide exposure of insects in nature conservation areas in Germany
 - Farmland practices are driving bird population decline across Europe
 - How pesticides impact human health and ecosystems in Europe
 - Pesticides and Soil Invertebrates: A Hazard Assessment
 - Pesticide effects on soil fauna communities-A meta-analysis
 - Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law
 - Collective Expert Review on the Health Effects of Pesticides,
 - Pesticide residues with hazard classifications relevant to non-target species including humans are omnipresent in the environment and farmer residence
 - Pesticide Residues in indoor dust of farmworker households across Europe and Argentina
- [6]
- <https://ipmworks.net/>
 - Protect crops by increasing plant diversity in agricultural areas
 - Reducing pesticide use while preserving crop productivity and profitability on arable farms, Crop management strategy redesign enables a reduction in reliance on pesticides: A diachronic approach based on a diversity of French commercial farms
 - From Pesticide Addiction To Ecological Integrated Pest Management
 - Farmer-led Research on Europe's Full Productivity
- [7]
- OECD Report: Policies for the Future of Farming and Food in the European Union
 - OECD Report: Agricultural Policy Monitoring and Evaluation 2023 - Adapting Agriculture to Climate Change
 - Fitness Check of the Common Agricultural Policy (CAP)
 - Pe'er et al. A greener path for the EU Common Agricultural Policy
 - Pe'er et al. EU agricultural reform fails on biodiversity
 - Pe'er et al. 2020: Action needed for the EU Common Agricultural Policy to address sustainability challenges
 - Pe'er et al. How can the European Common Agricultural Policy help halt biodiversity loss? Recommendations by over 300 experts
 - Naturefood: Kortleve et al., 2024: Over 80% of the European Union's Common Agricultural Policy supports emissions-intensive animal products
 - Joint letter to the EU Commission against the loosening of the CAP's environmental conditionality (2024)
 - IPSOS Citizens Poll on Pesticides (2023)
 - Citizens' Demands for Pesticide Reduction in Europe
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[8]

- The attack of the Commission on the environmental conditionality of the CAP is undemocratic, outrageous, and threatens the legitimacy of the CAP
- Commission proposal to abolish environmental requirements for agricultural subsidies puts farmers behind and makes problems worse
- A deathblow for the legitimacy of the CAP
- EU Ombudsman opens inquiry into legitimacy of CAP rewrite process
- How the European Commission prepared a proposal to amend legislation related to the Common Agriculture Policy

[9]

Environmental and climate assessments of CAP Strategic Plans

[10]

EU Vision for Agriculture and Food contains unscientific industry narrative on pesticides

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Pesticide Action Network (PAN Europe) is a network of NGOs working to reduce the use of hazardous pesticides and have them replaced with ecologically sound alternatives. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. Our network brings together over 45 consumer, public health and environmental organisations and women's groups from across Europe.



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