

CONSUMER RECOMMENDATIONS



The Consumer Voice in Europe

A Common Agricultural Policy that ensures healthy, sustainable, and affordable food for European consumers



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The European Consumer Organisation (**BEUC**) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.

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WHERE DO WE STAND IN THE LEGISLATIVE PROCESS?

- ▶ **Brief mention of the legislative stage:** The European Commission proposal is out. Member States and the EU Parliament are currently developing their positions. Once these are set, the file will go into trilogue negotiations.
- ▶ **BEUC CAP Survey:** BEUC and members investigated consumers views and expectations on the CAP in the first half of 2025. The report describes key results and related policy demands.

MAIN RECOMMENDATIONS

- 1. Tie funding to performance and move away from area-based payments:**
A stronger focus on outcomes will encourage production methods that respond to consumer demand for safer and lower-impact food.
- 2. Embed food affordability as a key deliverable:**
The CAP should ensure that consumers can access affordable, healthy, and sustainable food. The EU should monitor how CAP measures affect food prices.
- 3. Strengthen transparency and civil society involvement:**
The EU should involve consumer organisations in the implementation monitoring of CAP instruments.

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INTRODUCTION

The Common Agricultural Policy (CAP) affects almost every aspect of the European food system. Its design influences what is economically viable for farmers, how markets respond to shocks, what foods are available to consumers and at what price. Consumers recognise the importance of income support for farmers, but they want the CAP to go beyond agricultural policies.

Drawing on BEUC survey's results on what consumers want from the CAP, this paper sets out the key points the new CAP proposal post-2027 needs to address to match consumers expectations. A more systemic CAP could better ensure access to healthy soil and water, help rebuild healthy agro-systems more resistant to climate change, and better promote healthy and affordable diets for all.¹

The CAP can and should become a central instrument to deliver healthy, sustainable and affordable food for European consumers. For it to become a reality, and a more systemic framework, numerous elements need restructuring. We focus on three actionable priorities – environmental sustainability, food affordability and democratic governance – that the EU should target to respond to consumers' main expectations.

BEUC is committed to playing an active role in shaping these reforms, bringing clear consumer priorities, practical proposals and a focus on accountability to the ongoing legislative and implementation debates. A CAP that delivers for consumers can benefit all actors in the system, creating a more resilient, more equitable, and more legitimate European Food System.

1. THE CAP AS DRIVER OF SUSTAINABLE AND HEALTHY FOOD SYSTEMS

Main recommendation: A stronger focus on outcomes will encourage production methods that respond to consumer demand for safer and lower-impact food. Producers who invest in demonstrable sustainability gains should be able to translate those gains into market differentiation, increasing consumer choice and trust in the supply chain.

Sustainable food production directly benefits consumers. First, it **enhances food safety**, as targeted reductions in synthetic pesticide² and antibiotic use³ mitigate contamination and resistance risks across production. Second, increased biodiversity, soil health, and lower greenhouse gas emissions favour the **long-term resilience** of the food system, helping to stabilise production and protect future food

¹ IPES FOOD (2019). *Towards a Common Food Policy for the EU. The policy reform and realignment that is required to build sustainable food systems in Europe*. Available at: <https://ipes-food.org/report/towards-a-common-food-policy-for-the-eu/>

² European Food Safety Authority (EFSA, 2023), "Pesticide Residues in Food: Annual Report, available at: <https://www.efsa.europa.eu/en/efsajournal/pub/9398>

³ Kumar SB, Arnipalli SR, Ziouzenkova O. Antibiotics in Food Chain: The Consequences for Antibiotic Resistance. *Antibiotics (Basel)*. 2020 Oct 13;9(10):688. doi: 10.3390/antibiotics9100688.

availability.⁴ Third, it **builds democratic legitimacy**, as consumers, who increasingly demand sustainable and healthier food options, want a food system that rewards measurable environmental outcomes.⁵

The European Commission’s proposed CAP post-2027 maintains the current system of direct payments and voluntary eco-schemes⁶ under a new “Farm Stewardship Scheme”. It aims to simplify administration by merging existing eco-schemes and agricultural, environment and climate-related commitments into a single, simplified framework meant to reward sustainable practices. While simplification can help farmers better navigate CAP funding, the new scheme does not resolve the issue of area-based funding reliance as default, rather than rewarding tangible environmental outcomes.⁷

For the CAP proposal to respond to consumer demands, this policy framework must evolve from compliance-based to outcome-based payments. In the former, farmers receive funds following prescribed rules, regardless of whether they achieve the desired outcomes. In the latter, they receive funds based on achieving specific results.

For instance, some measures may continue rewarding farmers based on inputs or administrative actions – e.g. the amount of fertiliser or pesticide they reduce, or the number of hectares managed - rather than on actual environmental improvements, like healthier soils or increased biodiversity. Similarly, generic practices – e.g. planting grass strips along field edges or enrolling land in broad eco-schemes without monitoring results – could still count as “compliant” even when they produce limited environmental benefit.

The proposal also foresees a streamlined Performance Monitoring and Evaluation Framework (PMEF) to focus on fewer but broader indicators, giving Member States wide flexibility in setting national targets. While this may reduce administration, it also compromises comparability, as results across countries could be inconsistent. Member States may also apply different definitions and ambition levels, undermining environmental integrity. For example, indicators such as “share of agricultural land under environmental commitments” or “hectares covered by eco-schemes” measure participation rather than actual reductions in pesticide use, greenhouse gas emissions, or biodiversity loss. Similarly, climate performance assessment often relies on expenditure tagging rather than verified emission reductions.

To genuinely track environmental progress and move toward outcome-based payments, the EU should harmonise and strengthen reporting, with indicators that reflect real, measurable improvements rather than just procedural compliance. Making these indicators operational and comparable across countries

⁴ European Environment Agency (EEA, 2023), “Agriculture and the environment in EU-27”, Available at: <https://www.eea.europa.eu/en/analysis/publications/solutions-for-restoring-europes-agricultural-ecosystems?activeTab=b1ce3621-dbe2-42b6-ac8e-d251f2f960a2>

⁵ Candel, J.J.L. Power to the people? Food democracy initiatives’ contributions to democratic goods. *Agric Hum Values* **39**, 1477–1489 (2022). <https://doi.org/10.1007/s10460-022-10322-5>

⁶ Direct payments are the main form of CAP support. These are annual subsidies granted per hectare of eligible farmland, originally intended to stabilise farm income. Eco-schemes, introduced in the 2023–2027 CAP, offer additional payments to farmers who adopt environmentally friendly practices such as maintaining hedgerows, planting cover crops, or reducing pesticide use.

⁷ European Court of Auditors (2021), “Common Agricultural Policy and the environment: Ambitious goals, limited evidence. Available at: https://www.eca.europa.eu/en/publications/SR21_16

can ensure that CAP delivers a fairer and more credible framework where public funds deliver measurable environmental outcomes for consumers. BEUC recommends the following:

a) Establish clear baseline measurements

The post-2027 CAP proposal gives Member States flexibility to set environmental baselines, and it does not require common EU definitions. This makes it impossible to determine if CAP-funded actions truly generate environmental benefits. Instead, the new PMEF should measure environmental performance relying on transparent and harmonised baseline indicators, such as current pesticide use per hectare, livestock antibiotic sales, soil organic carbon content, or farm-level biodiversity.⁸ These baselines ensure comparability across regions and demonstrate progress over time.

b) Introduce tiered payment structures

The Commission's proposal to introduce a single "Farm Stewardship Scheme" allows Member States to differentiate payment levels. Yet, to match consumer expectations, payments should not only reflect participation by farmers receiving area-based payments, but also the degree of improvement achieved.⁹ To do so, a formal tiered system would reward incremental and high performance alike. For example, farmers who achieve moderate reductions in chemical inputs could receive a basic incentive, while those demonstrating substantial gains would receive higher payments.

c) Strengthen verification and monitoring systems

The post-2027 CAP proposal aims to simplify monitoring to reduce bureaucracy. This **should not weaken environmental accountability**, as performance-based schemes must rely on transparent and verifiable data to be trusted.¹⁰ For this credibility to be maintained, solutions include combining remote sensing technologies (e.g. satellite-based vegetation and soil monitoring), digital farm reporting tools, and targeted on-the-ground inspections to confirm results. Data collected through the PMEF should be publicly available in aggregated form, allowing independent experts and civil society to assess progress.

d) Provide transition support for farmers

Shifting to results-oriented schemes will require investment in new practices and technologies.¹¹ The Commission's proposal rightly continues to finance knowledge-transfer and innovation through **AKIS 2.0**. Yet, this support should be explicitly linked to consumers environmental expectations. To achieve this goal, the Commission should ensure that the CAP mandates Member States to reserve a defined share

⁸ European Commission (2022), *Observations on the Proposed CAP Strategic Plans*; Regulation (EU) 2021/2115, Available at: https://agriculture.ec.europa.eu/system/files/2022-07/csp-overview-28-plans-overview-june-2022_en.pdf

⁹ Pe'er G, Bonn A, Bruelheide H, et al. (2020), "Action Needed for the EU Common Agricultural Policy to address sustainability challenges", *People and Nature*, 2(2), 305–316

¹⁰ European Court of Auditors (2024) *Special Report: The new CAP – Greener, fairer, more performance-based?* Available at: <https://www.eca.europa.eu/en/publications/sr-2024-20>

¹¹ OECD (2023), *Policies for the Future of Farming and Food in the European Union*, *OECD Agriculture and Food Policy Reviews*, OECD Publishing, Paris, <https://doi.org/10.1787/32810cf6-en>.

of AKIS 2.0 funding for targeted support to smaller and resource-constrained farms. This would ensure they receive equal treatment during the move toward performance-based payments.

e) Reallocate funds if targets are missed

The proposal introduces a performance reserve to redirect funds when farmers do not meet their objectives. On top of this, the CAP should include automatic reallocation mechanisms to redirect funds,¹² if performance indicators show that certain measures consistently miss expected results at programme or regional level. Reallocation should focus on strengthening measures that demonstrate higher effectiveness or on providing additional capacity-building, technical support, or funding in areas where farmers struggle to meet targets. Importantly, these mechanisms should operate at programme level to avoid penalising individual farmers who may be affected by external factors such as climatic events or market volatility. The goal is to ensure that public funds are continuously directed toward actions with the greatest proven impact, not to jeopardise fairness and predictability for farmers.

2. GUARANTEE ACCESS TO HEALTHY FOOD

Main recommendation: For the CAP to better respond to healthy food’s accessibility and affordability demands, it is necessary to include mechanisms to monitor consumer concerns.

Food Affordability is a core consumer demand. Producing healthy and sustainable food is essential, but insufficient if most cannot afford it. When healthy food is unavailable and/or unaffordable, families are forced into suboptimal choices that compromise their health. This creates public health and economic problems.¹³ A consumer-centred CAP must therefore integrate affordability as an explicit objective alongside environmental goals.

The CAP proposal post-2027 sets food security as a priority, but it but still treats affordability as an indirect outcome rather than a policy objective, contrary to point e) of Article 39 of the Treaty on the Functioning of the European Union. References to ‘affordable food for consumers’ in the proposal’s objectives are good first steps but they lack concrete indicators or monitoring mechanisms. BEUC recommends the following:

a) Consumer affordability indicators need to be added to the CAP Performance Framework

Market interventions traditionally focus on producer prices or on stabilising supply, but do not routinely assess how they translate into retail prices or household purchasing power. Consequently, consumers can face volatile and elevated food costs even when production support mechanisms are in place.¹⁴ The post-2027 proposal streamlines reporting under the new PMEF, with Member States reporting annually

¹² European Court of Auditors, 2024, *ibidem*.

¹³ OECD/European Commission (2024), *Health at a Glance: Europe 2024: State of Health in the EU Cycle*, OECD Publishing, Paris, <https://doi.org/10.1787/b3704e14-en>.

¹⁴ OECD (2023), *Agricultural Policy Monitoring and Evaluation 2023: Adapting Agriculture to Climate Change*, OECD Publishing, Paris, <https://doi.org/10.1787/b14de474-en>.

on a defined set of context and output indicators (e.g. hectares under support measures, number of beneficiaries, pesticide-use reduction, etc.). However, it does not foresee regular publication of data on consumer food prices or affordability trends.

For this reason, policymakers should embed consumer affordability metrics in the CAP's performance framework by expanding the PMEF to include indicators such as the share of household expenditure on food and food price index by income quintile. Existing data sources, such as Eurostat's Harmonised Index of Consumer Prices (HICP), can serve as early-warning indicators for potential affordability or market imbalance issues. For essential food categories (fruit and vegetables, bread and cereals, legumes, and certain staples) monitoring should include sufficient detail to detect diverging trends across Member States and income groups. Indicators should thus be disaggregated by income level and region, to avoid masking internal disparities.

The Commission's Agricultural Market Observatory or a similar monitoring unit could integrate these data streams into its regular analyses. This would allow policymakers to track whether CAP measures support both producers *and* consumers.

b) Rebalance sectoral support toward healthy and sustainable food production

The CAP proposal post-2027 continues to fund traditional sectoral programmes but does not prioritise foods aligned with public-health and sustainability goals. Currently, roughly three quarters of CAP funding go towards emissions-intensive animal products.¹⁵ CAP support tends to keep livestock products relatively more competitive than plant-based foods. This contributes to price imbalances contradicting efforts to reduce the environmental impacts of EU food production and encourage healthier diets.

To rebalance animal and plant production in the EU, the CAP should better support sustainable diets by linking a share of direct payments or eco-scheme incentives to the production of fruits, vegetables, pulses and other healthier foods. Support for shorter supply chains and local markets can also reduce transaction costs and improve access in underserved areas. It is crucial that supply side measures go hand-in-hand with changes on the demand side through policies that focus on consumption such as the improvement of food environments. This would also ensure that market conditions are stable and rewarding for farmers. A gradual and clearly phased transition would help ensure that all players can adapt to its requirements.

The CAP should contribute to good animal husbandry by making sure that CAP funding matches consumer expectations on animal welfare. Less confinement in farming systems, better transport and slaughter conditions, ending the systematic killing of day-old chicks, and fostering a responsible use of antibiotics and healthier animals are not only key consumer demands, but essential societal challenges. Making sure that the CAP supports farmers towards better animal welfare systems is thus essential to address these pressing challenges.

¹⁵ Kortleve, A.J., Mogollón, J.M., Harwatt, H. *et al.* (2024), Over 80% of the European Union's Common Agricultural Policy supports emissions-intensive animal products. *Nat Food* 5, 288–292, Available at: <https://doi.org/10.1038/s43016-024-00949-4>

c) Establish trigger mechanism for market review

The CAP proposal post-2027 maintains existing market-management tools that activate when producer prices collapse or markets destabilise. A new affordability trigger based on Eurostat data should complement them. For example, this would activate when prices of essential food baskets rise faster than median income or inflation for two consecutive quarters. Once activated, the Commission could be responsible for conducting the assessment, specifically through a joint analysis by DG AGRI, Eurostat, and the relevant Market Observatories. This assessment should follow a defined timeframe, for example within six to eight weeks, to ensure that decision-makers receive timely information and can respond before affordability pressures escalate.

This review would not necessarily lead to price controls. Rather, it would signal that the European Commission needs to investigate the causes of food inflation to then recommend proportionate corrective measures. For instance, the issue could be caused by input cost inflation, supply bottlenecks, market concentration, or speculation. Once the Commission assesses these causes, it would implement recommended targeted interventions, such as time-limited support for low-income consumers through national safety-net instruments, recommendations for Member States to temporary support low-income consumers, investment in short supply chains, or an activation of the CAP's crisis reserve if market dysfunction is confirmed.¹⁶

d) Promote targeted social and procurement measures

Linking CAP support to local public procurement and school meal programmes can directly translate agricultural policy into improved access to nutritious food for children and disadvantaged groups.¹⁷ Recent inclusion in the ongoing revision of the Common Market Organisation Regulation of strengthened local, sustainable, and healthy food criteria for the school scheme offers promising insights into how this fairness principle can successfully be part of the CAP.

In sum, integrating affordability indicators into CAP performance monitoring is essential to match this second key consumer demand. It is key that the European Commission and Member States cooperate to define practical and measurable affordability metrics. This cooperation is crucial to develop price-monitoring systems that track retail prices by product category, region and income decile. It can also complement macroeconomic monitoring to build a fuller picture of when and where affordability fails.

¹⁶ OECD (2023), *Agricultural Policy Monitoring and Evaluation 2023: Adapting Agriculture to Climate Change*, OECD Publishing, Paris, <https://doi.org/10.1787/b14de474-en>.

¹⁷ Evaluation support study of the EU school fruit, vegetables and milk scheme, Final report, *Publications Office of the European Union*, 2022, <https://data.europa.eu/doi/10.2762/00763>

3. IMPROVE GOVERNANCE, TRANSPARENCY, AND CITIZEN INVOLVEMENT

Main recommendation:

Embedding transparency mechanisms in the CAP would enable consumer organisations to better support policymaking. Clear and open data allows consumer organisations and researchers to analyse outcomes, identify perverse incentives, and suggest improvements. For consumers, greater fund use visibility will link public investment to tangible benefits and strengthen the CAP's social licence.

Democratic legitimacy and trust are vital for the CAP to maintain public support. Consumers want to know how EU institutions and Member States spend public money, who benefits, and whether policy outcomes match their demands. Greater transparency reduces the space for misallocation, as consumers are the players who ultimately finance European food systems, and they simultaneously rely on their outputs. Granting consumers meaningful ways to participate is essential to make sure the European food system delivers the expected public goods.

The CAP proposal post-2027 maintains the current system of national strategic plans but does not significantly strengthen transparency or citizen participation. While Monitoring Committees persist, they remain dominated by governmental and agricultural representatives, excluding consumer organisations.

Furthermore, more flexibility for Member States to design national CAP plans may have potential advantages, such as an increased ability to tailor measures to local conditions. However, as it already occurred,¹⁸ this flexibility can translate into opaque decision-making and uneven accountability standards without meaningful and diverse stakeholders' involvement and democratic oversight. To prevent this, it is necessary to have better public access to detailed data on the criteria used for funds allocation, and the performance of funded measures.

To enhance consumer participation in the CAP, its governance framework should make transparency and participation mandatory elements of the CAP cycle. National and regional CAP plans should be published in accessible formats with searchable datasets that include allocation criteria, lists of beneficiaries, and performance indicators.¹⁹ Monitoring committees should include a guaranteed share of non-governmental voices, and consultations should be regular, meaningful and documented. Practical measures to achieve this are:

¹⁸<https://www.euractiv.com/news/eu-countries-question-commissions-opaque-e430m-boost-to-farmers/>

¹⁹ European Ombudsman (2022), *Recommendation on Public Access to Documents Relating to CAP Implementation*, available at: <https://www.ombudsman.europa.eu/en/decision/en/175321>

a) Require annual, documented consultations with national consumer organisations and civil society

Member States should organise structured and well-documented consultations when drafting, implementing, or revising their national CAP Strategic Plans. These consultations should include national consumer organisations and/or other civil society representatives, ensuring that policies reflect the perspectives of those directly affected by food affordability, safety, and sustainability issues. Consumer and civil society organisations should have consistent access to information and formal possibilities to submit recommendations. To guarantee transparency, Member States should publish consultation summaries and demonstrate how stakeholder input influenced the design or revision of CAP measures.

b) Mandate the publication of comprehensive datasets on payments and recipients

Transparency in public spending is essential for democratic accountability. While the post-2027 CAP proposal maintains the obligation for Member States to publish beneficiary lists, it does not standardise data formats or ensure user-friendly access. The CAP should require Member States to publish open-access, machine-readable datasets covering all direct payments and rural development funds, including the purpose, amount, and beneficiary category of each payment. Data should have a consistent EU-wide format to enable independent analysis, comparison, and scrutiny. This will allow consumers, journalists, and researchers to understand where CAP money goes and to assess whether it aligns with environmental and social priorities.²⁰

c) Include transparency and stakeholder engagement as audited items within the CAP's performance framework

The CAP post-2027 proposes a simplified PMEF that tracks economic, environmental, and climate results. Governance aspects are currently missing, so the Commission should add qualitative indicators measuring spending transparency, openness of decision-making, and stakeholder inclusion in CAP implementation. The PMEF should not only assess environmental and economic outcomes but also evaluate how transparently Member States report and how effectively they involve non-governmental stakeholders. This would incentivise administrations to maintain open and meaningful communication channels and consultation processes, strengthening democratic accountability within the CAP cycle.²¹

²⁰ European Court of Auditors (2022), *Transparency of CAP Payments: Data Gaps and Accessibility Issues*, available at: https://www.eca.europa.eu/en/publications/SR22_14

²¹ European Court of Auditors (2024), *Ibidem*.

d) Establish independent reviews or audit functions to assess inclusiveness and data accessibility

The CAP post-2027 proposal maintains the existing governance model, in which the European Commission monitors Member States' compliance through annual performance reviews, corrective actions, and financial controls.

However, this monitoring primarily concerns financial absorption and target achievement and does not systematically assess the quality of stakeholder participation or transparency of national implementation processes. As a result, governance standards may remain largely dependent on national discretion. To address this gap, the EU should either integrate governance indicators into the PMEF or establish a complementary independent review mechanism dedicated to assessing transparency and stakeholder participation.

Such a mechanism should evaluate whether Member States ensure diverse and meaningful consultation, apply inclusive procedures within Monitoring Committees, and publish complete, accessible, and standardised data on CAP spending and performance. Findings should be made public and accompanied by recommendations for corrective action where monitoring identified deficiencies.

ENDS