

The Consumer Voice in Europe

Ref.: BEUC-X-2024-036/CPE/cm

Brussels, 4 April 2024

Subject: Consumer groups call on the European Parliament to reject the CAP revision proposals

Dear Member of the European Parliament,

BEUC, the European Consumer Organisation, is writing to express our concern over the legislative proposals amending the Common Agricultural Policy (CAP) regulations which were presented by the European Commission on 15 March.¹ Following their endorsement by the Council², we understand that the proposals will now be sent to the European Parliament's plenary for a vote at first reading in the week of 22-25 April, without even undergoing the usual committee amendment stage. **We call on you to reject them.**

This rushed process is wholly inadequate considering the significant impact that these proposals could have on the sustainability of EU agriculture and its ability to continue feeding Europeans in the face of a changing climate. These measures were presented without any prior impact assessment and follow from an opaque week-long 'consultation' of just a handful of farmers' organisations. Yet a funding programme that receives a third of the EU's budget should be evidence-based and deserves full stakeholder and public scrutiny – in line with Better Regulation standards.

In just a few weeks' time, you are being asked to consider, and vote on, **the roll-back of several of the environmental and climate conditionalities** that were introduced during the last CAP reform with a view to better aligning the EU farm subsidies with sustainability objectives. This is at odds with the recommendations by the EU Court of Auditors which called on the European Commission to strengthen the CAP's contribution to climate action.³ Instead, the proposals on the table will seriously water down some of the very elements of the CAP benefiting climate (such as measures on minimum soil cover).

The proposals also foresee that small farms under 10 hectares⁴ would be exempted from controls and penalties related to compliance with conditionality requirements under the CAP. We are concerned that **without any controls, conditionality rules may simply not be complied with any longer.** The EU institutions should strike the right balance between reducing administrative burdens for farmers and ensuring that EU taxpayers' money is used in ways that effectively support the transition to sustainable agriculture.

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¹ https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1493

² <https://www.consilium.europa.eu/en/press/press-releases/2024/03/26/support-for-farmers-council-endorses-targeted-review-of-the-common-agricultural-policy/>

³ <https://www.eca.europa.eu/en/publications?did=58913>

⁴ Representing 65% of CAP beneficiaries and accounting for around 10% (on average) of the total EU agricultural area – yet this varies significantly across EU countries.

Against this background, we believe the European Parliament should **reject the CAP revision proposals**. Evidence is accumulating that the EU food system must do more to mitigate⁵ and adapt to⁶ climate change, while reducing its input-dependency.⁷ **There is no dispute the CAP will need to evolve to better fulfil its objectives, including climate action and responding to societal demand on food and health.**⁸ For instance, it is disturbing that a big chunk of the CAP subsidies continues to flow to animal-based productions,^{9,10} when evidence shows that supporting consumers to shift towards sustainable healthy diets (rich in wholegrain, vegetables, fruit and pulses, and with 'less but better' animal products) can benefit health, climate and food security at the same time.¹¹ The CAP also needs to do more on **animal welfare**, with a strong majority (74%) of consumers who would like the EU to provide funds to farmers to implement higher animal welfare standards.¹² By contrast, the short-sighted proposals currently on the table will steer us further away from a sustainable EU agriculture and food system.

Lastly, the CAP proposals fail to address farmers' main concerns expressed throughout the recent protests – namely, **the need for a fair income and for coherence between the EU's trade policy and the Green Deal**. The Commission has announced it will present options for actions to improve farmers' revenue. These various options need to be impact-assessed before they are taken forward to ensure they bring the expected results. BEUC especially welcomes the idea of an EU observatory on production costs and margins. Indeed, while food prices have skyrocketed over the past couple of years, farmers have pocketed little of the extra money paid by consumers. **More transparency is needed on where consumers' money goes** – and whether some actors in the chain might be taking a bigger share of the cake than they reasonably should. A strengthening of the **Directive on Unfair Trading Practices (UTPs)**, as well as its effective enforcement, also seems warranted to promote a fair food supply chain. Lastly, the EU must bring its trade policy in line with the Green Deal, including through the **introduction of import requirements** to ensure that food exported to the EU from third countries complies with the same rules as EU products.¹³

We thank you for your consideration and remain at your disposal, should you wish to discuss the above further with us.

Yours faithfully,

Camille Perrin
Head of Food Policy

⁵ <https://climate-advisory-board.europa.eu/news/eu-climate-advisory-board-focus-on-immediate-implementation-and-continued-action-to-achieve-eu-climate-goals>

⁶ <https://www.eea.europa.eu/en/newsroom/news/europe-is-not-prepared-for>

⁷ [https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU\(2024\)747272](https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU(2024)747272)

⁸ https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27/key-policy-objectives-cap-2023-27_en

⁹ Kortleve, A. J., Mogollón, J. M., Harwatt, H., and Behrens, P. [Over 80% of the European Union's Common Agricultural Policy supports emissions-intensive animal products](#). *Nature Food*. Published 1, April 2024.

¹⁰ Vallone, S., Lambin, E. F. [Public policies and vested interests preserve the animal farming status quo at the expense of animal product analogs](#). *One Earth* 6, 1213–1226. September 15, 2023.

¹¹ [Shifting diets for health and climate](#) (2024). Briefing by BEUC, EPHA and Eurogroup for Animals developed as part of the project 'Put Change On The Menu'.

¹² [BEUC report 'Farm animal welfare: what consumers want - A survey of Europeans' understanding and expectations'](#), February 2024.

¹³ BEUC [recommendations](#) to better align EU's trade policy with the Green Deal (2024).