

# INPUT FOR LEGAL FRAMEWORK AND PRINCIPLES FOR CAP 2028

**Organic Denmark, The Danish Society for Nature Conservation, Green Transition Denmark, Danish Vegetarian Society, Danish Plantbased Business Association, Animal Protection Denmark, World Animal Protection Denmark, The Danish Beekeepers' Association and BirdLife Denmark** have joined forces to present a common proposal on how EU agricultural support can be shaped to ensure healthy and green food production in Europe and healthy, sustainable food for consumers. The proposal is oriented towards the framework for support from EU Common Agricultural Policy and thus forms the basis for national implementation in Denmark.



## VISION FOR EU AGRICULTURAL SUPPORT

EU agricultural support should actively contribute to the expansion of a holistic and healthy agroecological system that respects planetary boundaries and supports a sustainable food value chain from farm to fork.

## PRINCIPLES FOR AGRICULTURAL SUPPORT

Agricultural support must promote the foundation for a green transition and therefore finance public goods related to farming and landscape management. This includes reducing climate impact, creating space for nature and biodiversity in the farmed land as well as in the countryside, protecting drinking water, achieving good ecological status of aquatic environments, and ensuring good animal welfare that allows animals to express natural behavior. Public goods create robust farming systems and intact ecosystems, which are prerequisites for food security. Animal welfare should be recognized as an independent objective and an integrated part of agriculture's development towards more sustainable production.

At the same time, agricultural support must be designed to strengthen the competitiveness of agriculture in a society with increasing demands for sustainability. Through incentive-based payments, agricultural support should reward the implementation of technological solutions and new management methods and farm transitions that enhance delivery of public goods without

compromising sustainable transition or high animal welfare standards.

In addition to direct support for farmers, funding should promote the transition towards more sustainable food and biomass value chains, generational renewal and permanent conversion of farmland to nature or afforestation.

There should be no subsidies for cultivation of high-emission land such as cultivation of peat soils. If coupled support for livestock or livestock products or support for advertising meat, eggs, and dairy products is maintained requirements for good animal welfare practices must be imposed.

## DEFINITION OF "PUBLIC GOODS"

Externalities that have no market price and cannot be privatized, as their effects impact everyone. For example, climate, aquatic environment, drinking water quality, air quality, nature and biodiversity, animal welfare (leading to lower average use of medicine and thus preventing antibiotic resistance) and extensification of livestock production, which reduces the risk of zoonotic disease outbreaks threatening human health and frees up land for purposes other than feed production.



## **DIRECT SUPPORT – PILLAR I**

Direct support is divided into a temporary basic income support and green payments via eco-schemes.

### **Basic income support**

Basic income support should be phased out gradually. It may constitute a maximum of 70% of the budget at the start of CAP 2028 and should decrease to 50% by the end of the period, with full phase-out over two CAP periods (14 years). Basic income support is paid per hectare.

### **Eco-schemes – Green Payments for public goods**

Eco-schemes value positive externalities and should include payments for delivery of public goods, ensuring that it is financially viable for farmers to prioritize eco-system services. Green payments should be granted based on results reporting with the use of validated methods within climate, nitrogen, animal welfare and space for habitats for wild species (plants/animals) thus enabling impact measurement at farm, national and EU level. This will make it possible to demonstrate the impact of the agricultural support system and document to what extent EU farmers deliver on agreed objectives, as also required by the European Court of Auditors. Support should finance both maintenance of desired condition and actions that create positive change (additionality).

### **Conditionality as an incentive basis**

With the phasing out of basic income support, general conditionality requirements should be replaced with targeted requirements based on climate, the Water Framework Directive, the Nature Restoration Regulation, the Nitrates Directive, the Birds Directive, the Habitats Directive, and rules for animal welfare protection, documented by validated calculation methods. These targeted conditionality requirements should reflect obligations and contributions towards national or EU-agreed targets where applicable, and function as thresholds for eligibility to apply for eco-schemes.

### **Small farms**

Member states may choose to apply a multiplication factor to increase rates for basic income support and eco-schemes to strengthen the economic basis for the continued existence of small farms.

### **Unused funds should be transferable to the next budget year**

There should be greater flexibility for unspent funds to be trans-

ferred to subsequent budget years. This will prevent the dilution of scheme ambitions merely to ensure that all funds in the national envelope are utilized.

## **SUPPORTING THE TRANSITION TOWARDS MORE SUSTAINABLE FOOD AND BIOMASS VALUE CHAINS – PILLAR II**

Pillar II should, among other things, promote the green transition through financing permanent conversion of farmland to nature or forest, development of new food and biomass value chains, and promote generational renewal through support for young farmers.

### **To support the transition towards more sustainable food and biomass value chains, funding should be available for:**

- **Upcycling and cascade utilization of residual biomass**  
Green biorefining enables better utilization of residual biomass through production of proteins, fibers and extracts. This helps replace imported soy and supports circular value-based use of agricultural resources.
- **Food value chains aligned with planetary dietary guidelines**  
Alternative food systems, including plant-based products, need to develop robust and efficient value chains. Animal-based value chains have been developed and supported for decades; alternative value chains require similar strength and predictability through funding and political prioritization.

### **Schemes targeting food and biomass value chains should include:**

- Investments in processing capacity and specialized equipment
- Collaborations between farming, processing, and marketing
- Innovation and testing of new crops and products
- Knowledge building and advisory services
- Establishment of a European plant-based fund inspired by the Danish Fund for Plant based Food
- A scheme to finance the phasing out of caged housing systems and implementation of improved animal welfare standards in housing and transport

### **Simplification**

Agricultural support should be simplified by:

- Developing and disseminating digital tools and the use of satellite monitoring to document conditions at individual farms
- Maintaining flexibility for member states to design schemes that reflect national needs and contexts within politically agreed goals