

## Looking again at the Strategic Plans of the new Common Agrarian Policy (PEPAC) and its future

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**Resumen:** La puesta en marcha de la nueva PAC está siendo más lenta y compleja que lo esperado. En un anterior artículo, planteábamos unas preguntas. Tres años después, lo hemos actualizado revisitando todos y cada uno de nuestros interrogantes.

El principal tema identificado pendiente es el nivel de ambición que debe tener los Planes Estratégicos. Por un lado, la PAC debe acompañar al conjunto de los actores de la cadena alimentaria en la adaptación y mitigación del cambio climático. Pero, por otro lado, para ser plenamente efectiva y eficiente, una política basada en el cumplimiento de objetivos requiere estabilidad, conocimiento previo de dichos objetivos y buenos indicadores. No parece que vaya a ser el caso de la PAC 2023-2027.

Concluimos que hay entonces que mirar más allá del año 2027. El alumbramiento de la PAC post-2027 (o seguramente post 2029) se anuncia de nuevo difícil, sobre todo si la Unión europea sigue sufriendo de “enanismo presupuestario”, el disponer de un presupuesto desfasado con respecto a sus ambiciones.

**Palabras clave:** Política Agraria Común; Planes estratégicos; Plan Verde Europeo; Estrategia “De la Granja a la Mesa”; Enanismo presupuestario.

**Abstract:** The implementation of the new CAP is being slower and more complex than expected. In a previous article, we raised some questions. Three years later, we have updated it by revisiting each one of our questions.

The main identified pending issue is the level of ambition that the Strategic Plans should have. On one hand, the CAP must accompany all the food chain actors in climate change mitigation and adaptation. But, on the other hand, to be fully effective and efficient, a policy based on meeting objectives requires stability, prior knowledge of said objectives, and good indicators. It does not seem that this will be the case for the CAP 2023-2027.

We conclude that we must then look beyond the year 2027. The birth of the CAP post-2027 (or surely post-2029) is once again difficult, especially if the European Union continues to suffer from "budgetary dwarfism", having a budget out of step with its ambitions..

**Keywords:** Common Agricultural Policy; Strategic Plans; European Green Deal, Farm to Fork Strategy, budgetary dwarfism.

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## INTRODUCCIÓN

In 2020, together with my colleague Carina Folkesson, we published an article in the *Agricultural and Resource Economics Journal*, entitled "The new delivery model of the CAP: Some relevant issues" in which we carry out a first analysis of the then proposed new management model of the Common Agricultural Policy (CAP) that the European Commission had announced in its Communication of November 27, 2017, 5 years ago (EC, 2017).

In a few words, the new governance model of the CAP consists of moving from a policy of obligation of means, the planned policy instruments and their correct use, to a policy of obligation of results. Each Member State is committed to achieving certain objectives and negotiates with the Commission the combination of means that it considers most effective and efficient, in the form of a Strategic Plan.

In the article, we concluded that the proposed paradigm shift would represent a clear modernization of the oldest of the common policies but that we should give time to time. A paradigm shift of this magnitude needs time to achieve real change. A progressive implementation over time is recommended.

Our article highlighted 5 topics that we qualified as "sensitive": the similarities between the new architecture and the historical management of Rural Development; the performance reserve and duration of the financial perspective; the extension of those Plans; a potential legal challenge in Spain and perhaps in other Member States and the declared ambitions for the Strategic Plans, a particularly important and topical issue to which we will be reserved special attention.

At the turn of summer 2022, in light of the Strategic Plans of the new CAP (SPCAP) approved by the Commission or still in the process of negotiation, we believe that it is a good time to return to our first ex-ante evaluation and delve into the reflection.

Our first purpose now is to reserve, for each of the five topics highlighted above, a specific section. In it we will address to what extent we have new elements to evaluate if our fears were founded.

In a long final chapter, we conclude that it is necessary to look beyond the year 2027. The birth of the CAP post-2027 (or most probably post-2029) promises to be difficult again.

## **1. CAN PDRS BE A MODEL FOR STRATEGIC PLANS ?**

From certain academic circles (Jongeneel , et al, 2019), and from a significant part of the services in charge of Rural Development in the General Directorate of Agriculture of the European Commission (DG AGRI), the example for future Strategic Plans was taken, the Rural development programs ( RDPs ) currently in force.

Another part of the European Institutions, such as the former Commissioner Phil Hogan (2018) and other DG AGRI services, agreed with the conclusions of the Special Report of the European Court of Auditors on the RDPs (ECA, 2017) that highlighted their complexity, its approach based on the scrupulous respect of the procedures and the correct formal use of the funds, neglecting the analysis of the real results obtained with said funds.

How is it possible that, after these criticisms, the RDPs have been thought of as a model? The answer lies in administrative and bureaucratic logics. It is the way in which all administrations, regional in the Spanish case, national and European, are used to working. At the Commission, the services used a checklist to make sure that the RDPs included everything it had to include.

The paradigm shift represented by moving from a policy of obligation of means to a policy of obligation of results also implies a new way of working to which administrations are not used to and are even poorly prepared (Carey, 2019).

It is too early to conclude that the paradigm shift has been successful, but, so far, it is clear that the RDP model has not been followed. The observations on the SPCAP drafts that the Commission sent to the Member States on June 21 <sup>1</sup>are good proof of this.

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<sup>1</sup> [https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cap-strategic-plans/obervation-letters\\_en](https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cap-strategic-plans/obervation-letters_en)

## 2. THE RESERVE OF EFFECTIVENESS

In its initial version, the Commission had provided for a “performance reserve”. It is about rewarding the Member States that are fulfilling their commitments with an additional budgetary amount.

The idea is a good one, as long as it was important enough to motivate the Member States. The proposal, 5% of the provision for rural development in each country in the last year, did not meet this condition.

The idea is a good one, provided that the reserve was significant enough to motivate the Member States. The proposal, 5% of the provision for rural development in each Member State for the year 2027, did not meet this condition. In fact, the levels of under-execution of the RDPs budget, even after the additional period of 2 or 3 years granted by the European regulations, are in almost all the Member States much higher than the amount that was foreseen for such reserve.

Member States did not like the proposal from the outset, as they do not easily accept supervision by the Commission and, even less so, if it could have direct budgetary consequences, even if they were limited. We concluded in the first article, after a detailed analysis, that the proposal was unfeasible in the current circumstances.

During a budget programming period (7 years for now), let alone during a shortened period like the current 2023-2027, it is technically impossible to meet all the planned requirements:

1. Implementation of the new CAP, in particular rural development measures;
2. Allow sufficient time for these measures to be implemented and take effect;
3. Correctly assess compliance with the initially scheduled objectives and prepare the corresponding report for the Commission, explaining to what extent they have been achieved and to what extent the achievements (and failures) are due to the Strategic Plan itself or to external factors;
4. Negotiate with the Commission a possible Action Plan to correct the errors observed;
5. Implement the Action Plan for enough time so that it can take effect and that these are measurable;
6. Prepare a new report on the results of the Action Plan and negotiate it with the Commission.

Then, and only then, could the performance reserve mechanism have been triggered. Our proposal was to maintain this reserve, not to question its amount (in its first implementation) but, in line with the position already defended by the Budget Committee of the European Parliament in two of its reports, to modify the programming period of 7 to 5 years to standardize it with the electoral rhythm of the European Parliament and to take two periods instead of one as a basis for analyzing the commitments, ten years instead of seven.

The final solution, agreed between the European Parliament and the Council of Ministers, has been the suppression of this performance reserve.

### **3. A STRATEGIC PLAN OF 100 PAGES**

The Member States must send the SPCAPs to the Commission for approval. The vast majority, 17 specifically, did so respecting the date of December 31, 2021. Next, the Commission must legally approve them "no later than six months after the interested Member State has presented it" In the Spanish case, this term ended June 30, 2022.

Article 118.2 of the regulation "which establishes rules in relation to aid for the strategic plans that must be drawn up by the Member States within the framework of the common agricultural policy (strategic plans of the CAP) " specifies the evaluation criteria that must be guide the Commission:

*“ The Commission shall assess the submitted CAP Strategic Plan with regard to its completeness, cohesion and consistency with general principles of Union law, this Regulation, the delegated and implementing acts adopted under it and the Regulation ( EU) 2021/2116, its effective contribution to the achievement of the specific objectives referred to in Article 6, paragraphs 1 and 2, and its impact on the proper functioning of the internal market and the distortion of competition, as well as the level of administrative burden for the beneficiaries and the administration. The evaluation will address, in particular, the suitability of the strategy of the CAP strategic plan, the specific objectives, the goals, the interventions and the allocation of corresponding budgetary resources to meet the*

*specific objectives of the CAP strategic plan, through the set of interventions proposed on the basis of SWOT analysis and ex ante evaluation.”*

It is true that the dialogue between the administrations has been continuous and that the informal consultations have paved the way. But, as the observations that the Commission sent last June, the approval process is not simply a formality, among other reasons because of the differences in criteria between the different Directorates General of the Commission (and even within the same Directorate General) . The (short in the Spanish case) delay in the final approval confirms the above.

Anticipating this problem, several senior Commission officials argued that the SPCAPs should be short documents, more or less 100 pages. Again, the logic of administrative management could be imposed in practice over the will of the legislator, since it is evident that a short SPCAP cannot respond with sufficient clarity and legal certainty to the requirements of the Regulation. Nor can it guarantee in practice that the logical differences in treatment between farmers from different Member States do not generate distortions of competition that could jeopardize the free movement of goods in the internal market (Becker and Grajewski, 2022).

Practice has put everyone in their place. The SPCAP proposal sent to the Commission by Spain on 29 December 2021 consisted of 3,381 pages. In its observations of June 2022, the Commission congratulated Spain for the complete nature (“comprehensive”) of its document.

#### **4. A POTENTIAL LEGAL CHALLENGE**

We refer in this section to an issue that arises at least in Spain and perhaps in federal Member States such as Germany or Austria where the regions have assumed the core of legal and legislative powers in matters such as agriculture and food.

The central government mainly plays a role in the coordination and promotion of convergences and synergies between the different policies

developed in the regions. The main exception is the implementation of directly applicable European policies since the Member State is Spain. This does not apply to European Directives and even in the agricultural case, the central core of the second Pillar of the CAP is directly under the control of regional authorities.

The issue then was what was going to be the legal status of the approval of the Strategic Plan. It has been clarified in the aforementioned Regulation: the Commission approves it, by an implementing decision without giving the other Member States the opportunity to interfere in the procedure. The competence to implement the SPCAP is therefore in the hands of the central government, always in dialogue and negotiation with the Autonomous Communities.

## **5. THE NECESSARY LEGAL SECURITY**

In our first article, we referred to the disturbing precedent of National Strategies in the fruit and vegetable sector, analyzed by Bijman (2015) in his report to the European Parliament.

The “brief and simple” the Strategic Plan is, the more room it leaves for future interpretations. Alan Matthews (2018) rightly insisted that “an under-researched issue to date in the evaluation of the new CAP governance model is the future role of the EU audit process” and drew the attention of his readers to the Sachsen (2016) well-documented 'cri du coeur' on the matter .

It seems more than likely that the problem will not arise with relevance in the first (short) period 2023-2027. As we have already mentioned, there is no material time for the implementation of the pertinent indicators, the collection of data after a reasonable period so that the impact of the measures adopted and their interpretation can be observed in order to be able to analyze to what extent the evolutions observed are due to the measures adopted or to external factors.

It is to be hoped that the indirectly open deadline with the delay in the entry into force of the new CAP governance model, and the shortening of its first period of application, will open up opportunities to fine-tune both the system of indicators and their interpretation and use to assess the SPCAPs. .

## **6. THE LEVEL OF AMBITION OF THE PLAN**

The negotiation of the new CAP, initially 2020-2027, began the day after the publication of the Commission Communication. Its intensity increased once the proposals for Regulations were published, both financial and agricultural, and culminated in an agreement in the fall of 2021.

In order for it to enter into force, as planned and still delayed, on January 1, 2023, the Member States began their work in 2019 with the initial phase of diagnosis, entering the final phase of drafting (and negotiation with the interlocutors and the regions in the Spanish case) in the summer of 2020. The administrative and legal machinery is heavy. Even once the Spanish SPCAP has been approved by the Commission, there is still a lot of work to be done at the level of the central government (18 Royal Decrees and a law, which has entered the Congress of Deputies through the urgent procedure) and the regional ones, without talk about the corresponding calls for aid to be published in the case of rural development.

The entire building is built on a commonly agreed level of ambition. But it happens that the proposal for a new CAP was formulated by a Commission and has been negotiated and is implemented by another, with other ambitions and different objectives.

The European Green Deal has become the great project of the Von der Leyen Commission, which is specified especially in the field of agriculture and food in two strategies, "From farm to table" (EC, 2020 a) and "Biodiversity" (EC, 2020 b).

There are four quantified objectives for European agriculture in these strategies: a 20% reduction in the use of fertilizers; the reduction by 50% of the risk and use of chemical pesticides in general and another 50% of the most dangerous; reducing the consumption of antimicrobials by livestock by another 50% and reaching 25% of the European utilised agricultural area mobilized by organic farming. The Commission has already announced that it is counting on mobilizing the CAP to achieve these objectives.

What the Commission approved in 2020 are two Communications, announcing future proposals, some of them even scheduled for the last quarter of 2023. Despite their potential significance, these were not accompanied by an impact analysis. Community rules do not oblige the Commission to do so before approving Communications because they do not have legal consequences, unlike what happens with a proposal for a Regulation.



The situation is more than contradictory, and is a good reflection of European texts approved after arduous negotiations that are characterized by their ambiguities.

On one hand, as Albert Massot (2022) points out, the quantitative objectives of the "From Farm to Fork" strategy have not been integrated into the operative part of the Regulations, nor the one that establishes rules in relation to aid to farmers and strategic plans (EC, 2022 a) nor the one that defines the rules relating to the financing, management and monitoring of the Common Agricultural Policy (EC, 2022 b). On the other hand, they are found, instead, in the four recitals (31, 42, 122 and 123) of the first Regulation and recital 60 of the second.

On one hand, as Ricard Ramón (2022) reminds us, "the Council demanded (and this was reflected in the text of the regulations of the new CAP that the Strategic Plans have to be adopted taking into account only legally binding legislative acts". On the other hand, Articles 120 and 159 of the Regulation on Strategic Plans grant the European Commission the power to "update" legislative acts on the environment or climate, which is equivalent to creating an automatic revision clause for the Plans.

These tensions quickly came to the fore on the first occasion that was presented, the recently proposal approved by the Commission on June 22 for a new Regulation on the sustainable use of pesticides (EC, 2022 c).

### **6.1. The sustainable use of pesticides as an example**

As the Commission itself explains, the proposal includes legally binding targets at EU level to reduce the use and risk of chemical pesticides by 50%, as well as the use of the most hazardous pesticides by 2030. Member States should set their own national reduction targets within defined parameters to ensure that the European Union as a whole achieves this target.

All farmers (and other professional pesticide users) should practice Integrated Pest Management (IPM), an environmentally friendly pest control system that focuses on pest prevention and prioritizes alternative pest control methods. pests, and chemical pesticides should only be used as a last resort.

The use of all pesticides would be prohibited in "sensitive places" such as urban green areas; public parks or gardens; children's parks; recreational

or sports areas; public roads; in Natura 2000 areas and in any other ecologically sensitive area to be preserved for threatened pollinators.

Other measures would include requiring Member States to set positive targets for increasing the use of non-chemical pest control methods and requiring farmers (and other professional users of pesticides) to obtain independent advice on alternative methods to ensure wider adoption. of non-chemical pest control methods.

Being optimistic about the deadlines necessary for its approval, a final text published in the Official Journal of the European Community cannot be expected before the second half of 2023. For now, the first reaction of the Ministers of Agriculture (and, largely from the Environment Ministers as well) has been rather cold.

In the press release issued by the Commission, new rules of the common agricultural policy are announced to ensure that farmers are compensated for any costs related to the application of the new rules during a transitional period of five years.

## **6.2. Facts are stubborn**

We are facing a clear case not only of regulatory confusion but of “optimism of the will”. These "new CAP rules" would imply a change in the SPCAPs, which would be "strategic" plans, that is, with a vocation to set the direction to follow for several years, modified every little, at the mercy of each new adopted proposal.

Assuming that the Regulation on the sustainable use of pesticides is approved at the end of 2023, the modifications of the SPCAPs would enter into force in 2025. This makes it impossible to obtain indicators that allow observing the results obtained (base of the new CAP delivery model) before 2027, the last year of the current budget programming period.

In 2025, we would already be halfway through the 2023-2027 period. It can be assumed that a large part of the planned rural development budgets will already be committed to multi-year obligations or to pending calls. Therefore, the scope actually available to mobilize funds for new priorities will always be limited and always to the detriment of other prior priorities.

There can be no doubt that sustainable agriculture, as a contribution to the maintenance of biodiversity, must consider the maximum possible reduction in the use of pesticides. There can be no doubt that the CAP, and

its SPCAPs , must accompany all the actors in the food chain in adapting to (and mitigating) climate change. Integration and coherence between the different public policies (European certainly but also national and regional) is a necessary condition, although not sufficient, to achieve this (Bazzan, Daugbjerg and Tosun , 2022).

But a policy based on the fulfillment of objectives requires stability, prior knowledge of said objectives and good indicators. An archer cannot be asked to reach the center of the target if, once shot, the target is moved.

### **6.3. An approval not without conflicts**

On July 18, the European Commissioner for Agriculture, Janusz Wojciechowski , announced that the procedures for the definitive approval of the SPCAP of five Member States (Portugal, Poland, Spain, Denmark and France) were beginning.

From environmental organizations (Amigos de la Tierra Europe, 2022) and from a large part of the scientific community, numerous voices have been raised to underline that the state plans are very far from the environmental commitments assumed by the EU and speak of “rushed” approval.

The tensions are also reflected within the Commission, between the different General Directorates and with the Vice-president Timmermans. Arc2000 (2022) have leaked highly critical internal notes from both the Environment and Climate General Directorates. In the end, the President Von der Leyen had to take matters into her own hands and remind all Commissioners that the Commission could not assume political responsibility for a new delay in the application of the CAP.

## **7. CONCLUSIONS**

The implementation of the new CAP, with the change in the governance model that it represents, is proving to be slower and more complex than expected. Earlier in the process, we had published an article that raised questions about its foreseeable implementation. After the publication of the European Regulations, the preparation by the Member States of their Strategic Plans and their presentation to the Commission, we have updated our analysis and revisited our questions.

A first conclusion is that, in several of the aspects pointed out as the model to follow for the preparation of the Plans, their complete nature and

their extension and the management of the performance reserve, the Member States and the Commission have come very close to the suggestions and proposals that we made.

One issue, that of the legal certainty available to the Member States, is logically unresolved, although the delay in the entry into force of the new CAP creates more favorable conditions for it to be channeled satisfactorily.

The main sticking point focuses on the level of ambition that SPCAPs should, or can, have and their consistency with the European Green Plan and the Community Strategies “From Farm to Fork” and “Biodiversity”.

There can be no doubt that the CAP, and its SPCAPs, must accompany all the actors in the food chain in adapting to and mitigating climate change. There can be no doubt that sustainable agriculture, as a contribution to the maintenance of biodiversity, must consider the maximum possible reduction in the use of pesticides. Integration and coherence between the different European (and national and regional) policies is a necessary condition, although not sufficient, to achieve this

But a policy based on the fulfillment of objectives requires stability, prior knowledge of said objectives and good indicators. An archer cannot be asked to reach the center of the target if, once shot, the target is moved. It does not seem that this will be the case for the 2023-2027 CAP.

### **7.1. The calendar again as a problem**

Everything seems to indicate then that this CAP "shortened" in time will only mark, on one hand, the beginning of the implementation of the new governance model and, on the other, an additional step towards a policy that does not focus only in agriculture but also in food and in the environment. As Albert Massot (2022) correctly points out, “the deployment of a large part of the CAP will wait to the next reform”.

There is abundant scientific literature on the complexity of developing coherence between the objectives of the different policies (Recanatì et al, 2019; Duru et al, 2022; Fundación Carasso, 2022; Grant, 2022). There are also numerous analyzes on the importance of “trail dependency”, particularly with regard to environmental aspects and the CAP (García Azcárate and Mili, 2020).

In this difficult context, the calendar is once again a problem, as it has been for the CAP that starts in 2023. The CAP in principle post-2027, like

the financial perspectives for the same period, will be prepared by this Commission, but the proposals will be presented by another Commission, that will be nominated after the European Parliament elections in June 2024. We know from experience that the transition between two Commissions can be difficult if there is not full continuity in the political line. Who knows what the priorities of the new European Parliament and of the European governments will be at that time?

All this suggests that, once again, the new CAP will not be decided in time to be applied on January 1, 2028 and that, therefore, we will again have a delay of one or two years.

But, moving away from the political aspects, one wonders on the basis of which data and evidence will the Commission services be able to carry out the preparatory work. It is true, as Ricard Ramón (2022) points out that "the Commission is called upon to examine the 'collective efforts' of all strategic plans and publish a report in 2013" but, at this point, it can only be based on their declarations of intentions and not on practical results. Let us not forget that, at the rate at which they are being approved, it is not ruled out that in some Member States the year 2023 will begin without SPCAP.

Indeed, in the year 2024 it will be materially impossible to have a serious evaluation of the impact of the Strategic Plans. Even the evaluation officially scheduled for 2025 can hardly go beyond some indicators on the structure of spending, in no case with impact indicators. We disagree on this with Albert Massot (2022) who does believe that these evaluations "will play a transcendental role".

If, in addition, we take into account the potential existence of other exogenous factors to the CAP that can have a great influence, we can only conclude that the debate on the post-2027 CAP will be a discussion, and a negotiation, with strong ideological overtones.

We don't know which ones, we don't know when, but we do know that events like the ones we have recently experienced, such as "El Niño" and La Niña"; the multiplication of climatic accidents and their greater severity directly related to the consequences of climate change; the war in Ukraine and its consequences on the grain, oilseed and fertilizer market; the evolution of energy costs; the COVID epidemics; the maritime logistics problems... will continue to occur.

## **7.2. The underlying problem: budget dwarfism**

The underlying problem is not that public policies should be consistent with each other. It is not even that the climate change adaptation and mitigation should be a transversal objective for all of them, European and national. Both are evidence.

The underlying problem is that the European Union rightly wants to equip itself with an environmental policy that lives up to its ambitions and the international commitments assumed by the Member States themselves in multiple international conferences. It also wants to display world leadership on these issues, as a central element of a common foreign policy. It wants all this without having the necessary funds to appropriately budget for its environmental policy, at the height of its ambitions.

As long as the European budget is limited to 1% of its Gross Domestic Product (as a reference, in Spain public spending in 2021 reached 50.6% of GDP<sup>2</sup>); while the budget discussions begin by setting a spending limit (and, for the first time in this 2020-2027 period, a decrease in said ceiling is agreed); while instead of first discussing the political priorities and their financing, the debate on the size of the budget is prioritized; as long as in the European Parliament the Budgetary Control Commission (COCOBU), capable of making a Commission to resign, has more political power than the Budgetary Commission (COBU) and these have more weight than the political Commissions, the European Union will be sick of budgetary dwarfism.

When you don't have sufficient means to have the European Union you want or the one you need, you have the European Union that you can.

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