



EEAC

CAP 2028-2034

A Comparative Analysis of
the Proposed 2028-2034
and 2023-2027 CAP
Frameworks

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1. CAP Framework- Introduction

Launched in 1962, the Common Agricultural Policy (CAP) is one of the EU's oldest, most integrated and financially most significant common policies.[1] It was initially launched as a response to post-war food shortages, low agricultural productivity, general market instability and a strong need for securing a reliable food supply across Europe.

The policy's original goals, which still remain at the heart of the CAP today, are included in the Treaty of Rome and concern increasing productivity and stabilising markets, ensuring the availability of food at reasonable prices, and providing fair living standards to farmers.[2] However, over time, the CAP has undergone significant changes and developments that resulted in a more multifunctional policy framework. The scope of the CAP has also been extended and nowadays goes far beyond purely agricultural production and market support, touching upon areas such as environmental protection, climate action, biodiversity conservation and the sustainable management of natural resources.[3]

This transformation did not occur immediately but rather took the form of gradual development through successive reform efforts. Over time, the CAP moved from its original focus on market intervention and production support to a more holistic and broader framework that also encompasses subjects such as

sectoral income support, rural development, or environmental considerations. In this sense, the most recent CAP developments can be seen as a continuation of the policy's general evolution, following the changing priorities at the EU level.

The following paper examines the most significant changes and developments introduced by the proposed CAP framework for 2028-2034[4] in comparison with the preceding 2023-2027 framework. It analyses the main legal, budgetary and political implications of the proposed framework and its significance for the future direction of the CAP.

Such a comparison is of particular relevance because, although CAP programming is normally aligned with the EU's seven-year budgetary framework, the current 2023–2027 period was preceded by an exceptional transitional phase in 2021-2022, resulting from delays in the adoption and implementation of the reform.[5] In this context, the paper evaluates whether the proposed 2028-2034 framework follows the existing direction and can be seen as a continuation of the current CAP model, or whether it introduces changes so significant that they amount to a more substantial shift in the EU's agricultural priorities.

2.CAP 2023-2027: main features and limitations

At the time of its introduction, the CAP 2023-2027, was aimed at making farming in the EU fairer, greener and more results-driven by introducing significant reforms. [6] In the new system, a central role was given to national CAP Strategic Plans, through which EU Member States were supposed to implement the core objectives of the CAP, i.e. its social, environmental and economic goals.[7]

Due to the social and geopolitical circumstances during preparation and introduction phases of the current CAP, it served as a policy response to the broader needs and challenges facing Europe during the post-pandemic period, global instability and growing climate pressures. Unlike previous CAPs, the 2023-2027 framework placed particular emphasis on aspects such as environmental and climate objectives, greater flexibility for Member States, and crisis-response capacity.[8]

The introduction of the above-mentioned CAP Strategic Plans prepared by the Member States presents a significant step, enabling greater national flexibility in implementation of CAP objectives.[9] With this in mind, the new framework targets creating a more flexible and responsive CAP better suited to the changing needs of the agricultural sector in the Member States, while aligning with wider EU policy priorities.

Despite these ambitious goals and the system of strategic plans, the ongoing period also revealed several limitations of the current CAP-system, especially regarding administrative burdens, implementation difficulties, and the overall effectiveness of the framework. Many concerns were raised about the system of CAP implementation and the overall complexity of the process, which created challenges and obstacles mainly for national authorities and farmers, making the application of the framework across Member States more difficult.[10] These implementation challenges were particularly significant in terms of the financial and administrative structure of the CAP, which depends on the national authorities of each Member State for the management and distribution of payments.[11]

Bearing in mind the limitations and challenges encountered in the implementation of the CAP 2023-2027, as well as the changing economic, environmental and political context, the proposed CAP 2028-2034 framework can be seen both as a response to the identified shortcomings of the existing model and, at the same time, as a continuation of the CAP's core objectives and underlying principles.



Figure 1: The 10 CAP objectives chart: Key policy objectives of the CAP 2023-27 - Agriculture and rural development

3. CAP 2028-2034 reform: core features and responses to the limitations of CAP 2023–2027

I. The formal reasons for CAP reform

The proposal for the new CAP 2028-2034 framework should be understood in light of both administrative requirements and broader political and policy pressures. As the CAP 2023-2027 currently in force is set to expire on 31 December 2027, the EU is required to submit an updated model for the following programming period.[12] Additionally, the new CAP proposal must be prepared in parallel with

the Commission's proposal for the next Multiannual Financial Framework (MFF) for 2028-2034, which is the EU's long-term budgetary framework setting out the overall structure, priorities and financial limits of Union spending for the seven-year period.[13] Since the CAP remains one of the EU's central spending priorities, any changes to the policy must be well aligned with the broader financial framework of the Union.[14]

The newest MFF proposal, officially presented on 16 July 2025, introduces a broader restructuring of EU spending that also directly and significantly affects the CAP. In particular, it brings agricultural funding into the new system of National and Regional Partnership Plans, meaning that the future CAP is expected to operate within a more integrated and flexible budgetary architecture.

II. The practical reasons for CAP reform

The formal timing requirements are not the sole reasons behind the reform of the current CAP. More specifically, several practical obstacles emerged during the implementation of the CAP 2023-2027.

- These included, for instance, the administrative burden connected with the preparation and amendment of CAP Strategic Plans. Introduced under the CAP 2023-2027, these plans, required each Member State to prepare a comprehensive national strategy explaining how it intended to implement CAP objectives.[15]
- Although this system was originally designed to provide greater flexibility and allow Member States to adapt the CAP to their specific agricultural needs, in practice it increased the complexity of the implementation process. Drafting, approval, monitoring and amendment of the plans required significant administrative effort at national level in the Member States.

- Additionally, the complexity of the system was not limited to public authorities, but also affected farmers, who were required to navigate new rules and comply with expanded reporting and control obligations, further increasing the administrative burdens. [16]
- Moreover, the general complexity of the CAP 2023-2027 framework was not limited to individual procedures—such as administrative obligations at national level, but characterised the system as a whole. This was largely due to numerous interactions between multiple layers of regulation, planning, implementation, monitoring and compliance, which together made the framework more difficult to manage. [17]

As a result, the functioning of the CAP 2023-2027 framework depended not only on the substance of the policy, but also heavily on the capacity of national authorities, paying agencies and farmers. In summary, these difficulties demonstrated that the effectiveness of the CAP relied not only on the strength of the policy itself, but also on the existence of a framework capable of being implemented in a clear and manageable way. Therefore, this became one of the key practical reasons behind the need for a reform of the CAP for 2028-2034.

4. CAP 2028–2034 proposal: reforms introduced

The proposed CAP 2028–2034 was presented by the Commission not as an entirely new policy model, but rather as a reformed framework aimed at addressing the issues discussed above concerning the general complexity of the 2023–2027 model, while- at the same time- preserving the core objectives and underlying principles of the CAP. Resultingly, the framework has twofold objectives: on the one hand, introducing strategic reforms- mostly regarding the overall structure of the policy- to enable faster and more efficient implementation- and on the other hand, preserving the CAP's core objectives while adapting the framework to the practical, economic and environmental challenges revealed under the 2023–2027 model.

I. Budgetary and governance architecture reform

The most significant reform introduced by the proposed CAP 2028–2034 concerns its budgetary and governance architecture. Under the current 2023–2027 framework, CAP financing is organised through two separate funds: the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD).[18] Under the new 2028–2034 proposal, the CAP would be integrated into the broader system of National and Regional Partnership Plans established within the next MFF.[19]

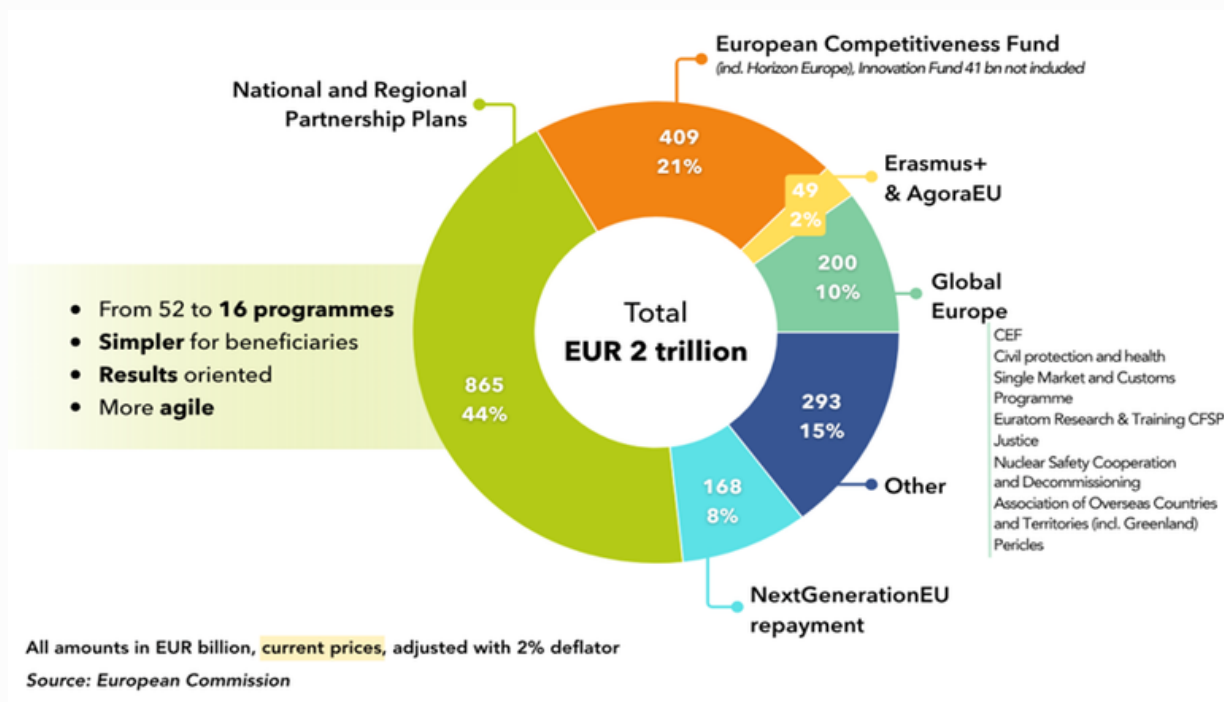


Figure 2: Overview of the main funds and their distribution within the proposed Multiannual Financial Framework (MFF).

This system is intended to bring together EU funds implemented by Member States and regions under one coherent strategy, with agricultural policy at its core. The Commission presents this reform as a means of “simplifying access to funding, increasing synergies between policy areas and making support more flexible and better adapted to national needs”. [20] For the CAP itself, this means moving away from the previous two-pillar structure and merging the two existing funds into a single instrument. As illustrated in the chart, this reform places the National and Regional Partnership Plans at the centre of the new budgetary architecture.

II. Income support reform

Another significant reform introduced by the 2028-2034 proposal concerns income support. Income support remains one of the central instruments of the CAP, as it is intended to provide farmers with a stable financial basis and strengthen the economic resilience of the agricultural sector.[21] The proposal secures a budget of at least €300 billion for income and crisis support, of which €293.7 billion is reserved for income support and €6.3 billion for a market-disturbance mechanism referred to as the Unity Safety Net.[22] In the proposed framework, this support is intended to become fairer – by ensuring that public funding is directed more clearly towards those farmers most in need. This means that the 2028-2034 proposal does not aim to remove income support but rather reorganise it in a way that improves both its distribution and its practical effectiveness.

This reform is particularly important because income support continues to play a key role in ensuring stability and resilience within the EU agriculture sector. [23]

III. Simplification and greater flexibility of implementation

Finally, the third major reform introduced by the proposed CAP 2028-2034 concerns simplification and greater flexibility of implementation. Since, as discussed, one of the main criticisms of the CAP 2023-2027 framework concerned its administrative complexity, the new proposal seeks to make the CAP easier to manage and more efficient. These objectives are to be achieved by reducing unnecessary procedural burdens and by providing Member States with a more flexible framework for implementation. This reform is particularly important – because it is intended not only to simplify the functioning of the CAP – but also to ensure that the policy can respond more effectively to national needs. One example of the simplification is the above-mentioned merger of the two current CAP funds into a simpler and more flexible system. The Commission presents this as easier for national administrations to manage and better suited to strategic planning.[24] Furthermore, this shift is also visible with regard to green infrastructure. Under the 2023-2027 CAP, green infrastructure-related elements, such as hedgerows, trees, buffer strips, wetlands and other landscape features, were mainly addressed through the CAP’s environmental architecture.[25]

These elements are important because they support biodiversity, improve soil and water management, and help agricultural land adapt to climate-related pressures. In the proposed 2028–2034 framework, green infrastructure remains relevant. However, its practical implementation is expected to depend - compared to CAP 2023-2027 - more strongly on Member States and the way they design their national and regional measures.

The new CAP does not remove green infrastructure from the policy framework, but rather it is placed within a more flexible system that depends on Member States' approaches. As a result, the effectiveness of these measures will largely depend on the level of ambition and priorities set by individual Member States.[26]

CAP income support	2021-2027	2028-2034	Per cent change
Direct payments (99% of expenditure commitments)	267.3		
Market-related expenditure (75% of expenditure commitments)	15.6		
EAFRD (85% of expenditure commitments)	72.3		
Ring-fenced CAP income support		295.7	
Unity Safety Net		6.3	
Totals	357.2	302.0	-15%

Figure 3: The main changes in the structure and level of CAP income support between the 2021–2027 and proposed 2028–2034 frameworks

5. Timeline of the CAP 2028-2034 reform

The CAP 2028–2034 reform is currently at the legislative proposal stage. Before the formal presentation of the proposal, the European Commission's Annual Budget Conference, that took place on 20–21 May 2025, was one of the preparatory steps leading to the next long-term EU budget for 2028-2034.[27]

The post-2027 CAP proposal was presented by the European Commission on 16 July 2025. According to the Commission's indicative timeline, Member States are expected to prepare draft national plans in 2027.[28]

In the meantime, the proposal is still being examined by the European Parliament, where discussions with Member States were still ongoing as of April 2026. The new 2028-2034 CAP will officially enter into force on 1 January 2028, together with the new Multilevel Financial Framework for 2028-2034.

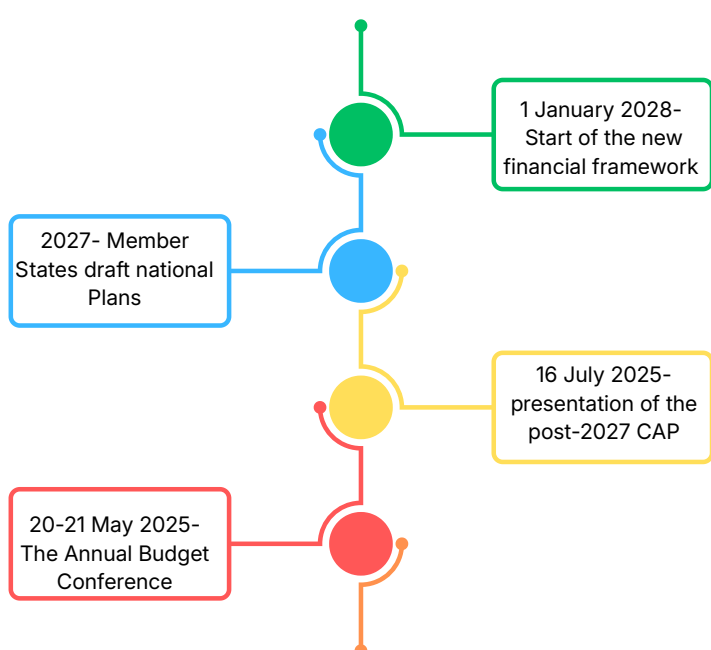


Figure 4

6. Summary

In conclusion, the proposed CAP framework for 2028-2034 can be understood both as a continuation of the existing CAP model and, at the same time, as a response to the practical shortcomings revealed under the 2023-2027 framework.

The core objectives of the CAP, including support for farmers' income, food security, market stability, rural development, environmental protection and climate action, remain unchanged, but the new proposal introduces several significant reforms intended to make the policy simpler and more adaptable to the challenges the EU faces today. As demonstrated in the analysis, the reform is driven not only by the formal need to replace the current CAP period after 2027 and align the policy with the next MFF, but also by practical concerns arising from the CAP 2023-2027. The need for reform was particularly reinforced by practical obstacles such as the complexity of the 2023-2027 CAP Strategic Plans, the administrative burden placed on national authorities and farmers, and the general difficulty of implementing the framework.

Against this background, the proposed CAP 2028-2034 introduces three especially important changes. First, it reforms the budgetary and governance architecture of the CAP and integrates it into the broader system of National and Regional Partnership Plans under the new MFF. Second, it restructures income support, making it more targeted while maintaining substantial financial support for farmers and crisis response. Third, it seeks to simplify implementation and provide greater flexibility for national authorities. Overall, the proposed CAP 2028-2034 represents a substantial reform of the structure and operation of the framework, while at the same time preserving the fundamental logic and long-standing objectives of the policy.

7. References

1. European Commission. (n.d.). The common agricultural policy at a glance. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-glance_en.
2. Council of the European Union. (2023, January 30). Feeding Europe - 60 years of common agricultural policy. <https://www.consilium.europa.eu/en/60-years-of-common-agricultural-policy/>.
3. European Commission. (2022, February 24). Factsheet – a greener and fairer CAP. https://agriculture.ec.europa.eu/system/files/2022-02/factsheet-newcap-environment-fairness_en_0.pdf.
4. European Commission. (2025, July 17). 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 Agricultural Policy for the period from 2028 to 2034. https://eur-lex.europa.eu/resource.html?uri=cellar:5b8a638c-62f9-11f0-bf4e-01aa75ed71a1.0001.02/DOC_1&format=PDF.
5. European Commission. (n.d.). CAP transitional regulation. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/transitional-regulation_en.
6. Council of the European Union. (2025, May 26). CAP funding rules 2023-2027. <https://www.consilium.europa.eu/en/policies/cap-funding-rules-2023-2027/>.
7. European Commission. (n.d.). Key policy objectives of the CAP 2023-27. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-glance/key-policy-objectives-cap-2023-27_en.
8. Council of the European Union. (2025, May 26). CAP funding rules 2023-2027. <https://www.consilium.europa.eu/en/policies/cap-funding-rules-2023-2027/>.
9. European Commission. (2023, June). Approved 28 CAP Strategic Plans (2023-2027): Summary overview for 27 Member States. Facts and figures. <https://agriculture.ec.europa.eu/system/files/2023-06/approved-28-cap-strategic-plans-2023-27.pdf>.
10. Negedu, E. (2024, May). Assessing the Common Agricultural Policy (CAP) of the European Union: A critical review of its environmental and climate ambitions. https://www.researchgate.net/publication/391849464_Assessing_the_Common_Agricultural_Policy_CAP_of_the_European_Union_A_Critical_Review_of_Its_Environmental_and_Climate_Ambitions.
11. European Parliament. (2021, September 22). The EU common agricultural policy, its reform and future in brief. <https://www.europarl.europa.eu/topics/en/article/20210916STO12704/the-eu-common-agricultural-policy-its-reform-and-future-in-brief>.
12. Council of the European Union. (2025, May 26). Timeline – Common agricultural policy 2023-2027. <https://www.consilium.europa.eu/en/policies/cap-funding-rules-2023-2027/timeline-common-agricultural-policy-2023-2027/>.
13. European Parliament. (2025, November). Multiannual financial framework. <https://www.europarl.europa.eu/factsheets/en/sheet/29/multiannual-financial-framework>.
14. Hansum, R., Lindner, J., Redeker, N., & Rubio, E. (2025, August 1). Ripe for Reform – What's in the EU Budget Proposal and What Should Come Next. Jacques Delors Centre.

15. European Commission. (n.d.). CAP Strategic Plans. https://agriculture.ec.europa.eu/cap-my-country/cap-strategic-plans_en.
16. Council of the European Union. (2025, May 26). CAP funding rules 2023-2027. <https://www.consilium.europa.eu/en/policies/cap-funding-rules-2023-2027/>.
17. European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3. (2025, May). Study on simplification and administrative burden for farmers and other beneficiaries under the CAP. <https://eu-cap-network.ec.europa.eu/sites/default/files/publications/2025-05/eu-cap-network-report-study-on-simplification.pdf>.
18. European Commission. (n.d.). Common agricultural policy funds. https://agriculture.ec.europa.eu/common-agricultural-policy/financing-cap/cap-funds_en
19. Rubio, E., & Alcidi, C. (2026, March). Navigating the European Commission's MFF Proposal for 2028–2034: Mapping risks and opportunities for cohesion policy and regional development. European Parliament, Policy Department for Regional Development, Agriculture and Fisheries. https://institutdelors.eu/content/uploads/2026/03/CASP_STU2026776029_EN.pdf.
20. European Commission. (2025, July 17). Commission proposes more flexible and performance-based Cohesion Policy for 2028-2034. https://ec.europa.eu/regional_policy/whats-new/newsroom/17-07-2025-commission-proposes-more-flexible-and-performance-based-cohesion-policy-for-2028-2034_en.
21. European Commission. (n.d.). Income support explained. https://agriculture.ec.europa.eu/common-agricultural-policy/income-support/income-support-explained_en.
22. European Commission. (n.d.). The CAP post-2027 in the next EU budget. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-post-2027-next-eu-budget_en.
23. Fabio Gaetano Santeramo. (2026, February 12). Understanding the Common Agricultural Policy's new direction. Florence School of Regulation. <https://fsr.eui.eu/understanding-the-common-agricultural-policys-new-direction/>.
24. European Commission. (2025, July 17). The next chapter for the CAP. https://agriculture.ec.europa.eu/media/news/next-chapter-cap-2025-07-17_en.
25. EU CAP Network. (2024, November 5). Green Architecture – Member States' approaches to designing green strategies in their CAP Strategic Plans. https://eu-cap-network.ec.europa.eu/publications/green-architecture-member-states-approaches-designing-green-strategies-their-cap_en#section--resources
26. European Commission. (n.d.). An environmentally sustainable CAP. https://agriculture.ec.europa.eu/cap-my-country/sustainability/environmental-sustainability/cap-and-environment_en
27. European Commission. (2025, May 20). Speech by President von der Leyen at the Annual EU Budget Conference 2025. https://ec.europa.eu/commission/presscorner/detail/nl/speech_25_1284.
28. European Commission. (n.d.). The CAP post-2027 in the next EU budget. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-post-2027-next-eu-budget_en#indicative-timeline.