September 2026

First statement by the Platform of Associations on CAP on the national implementation of the CAP from 2028

Proposal on the design of the mandatory differentiation of future basic payments

Preliminary remark: *The signatory associations reiterate their demand[1] that the next CAP funding period from 2028 to 2034 must be used to phase out flat-rate area-based payments completely and replace them with payments that reward farmers' specific contributions to environmental protection, climate action, nature conservation and animal welfare in a way that contributes to their income. To achieve this, it is necessary to set the level of the future basic payments (DABIS[2]) as low as possible and to scrap the minimum amount of €130 proposed by the European Commission for the average basic payment[3]. At the same time, provision must be made for an annually increasing minimum budget for agri-environment and climate actions (AECA), accompanied by low national co-financing rates and ambitious EU-wide minimum standards. In this respect, the differentiation of the basic payments envisaged by the European Commission can in no way replace the necessary transformation – as recommended by the scientific community and the ZKL (commission on the future of agriculture) – towards an agricultural policy that is also societally acceptable, consistently aligned with the EU's environmental, climate, biodiversity and animal welfare objectives, and which creates adequate incomes and prospects for farmers. However, as long as the basic payments still exists, the signatory associations believe that the requirement for its differentiation should be as ambitious as possible, i.e., it should be utilised and implemented in line with the objectives of society as a whole. In this paper, the signatory associations present a proposal for how this might be structured.*

Whilst at EU level the legislative process for the next Common Agricultural Policy (CAP) is expected to continue until mid-2027, in Germany the debate on the national implementation of the European Commission's (COM) proposals for the CAP from 2028 onwards[4] is already in full swing. This also concerns the instrument of degressive area-based income support (DABIS, hereinafter referred to as the 'basic payment'). Under the future CAP, the basic payments are supposed to merge the current basic income support, the redistributive payments and the supplement for young farmers. In addition to the requirement for a degressive structure and a capping of the basic payment, the Commission's proposal stipulates that Member States must differentiate the basic payments according to income criteria, based on groups of farmers or geographical areas. In this context, particular reference is made,

[1] See the statement by the Platform of Associations on CAP, November 2025 – Essential improvements to the European Commission's proposals for the CAP post 2027. www.verbaende-plattform.de/stellungnahmen

[2] DABIS = degressive area-based income support (the new term for the basic payment)

[3] The Commission has proposed a range for the structure of the future basic payment, according to which the national average basic payments must be at least €130/ha and no more than €240/ha. This means that, where payments are differentiated for individual farms, higher or lower payments may be made regardless of the national average (COM (2025) 560, Article 6(2)).

[4] This opinion refers exclusively to the Commission's proposal (see COM (2025) 560), as no final agreed position has yet been established in the European Parliament or the Agriculture Council.

for the targeting of payments, to '*farmers who are the most in need, in particular young and new farmers, women, family or small farmers, farmers combining the production of crops and livestock or farmers in areas with natural or other area-specific constraints determined in accordance with Article 8.' (COM(2025) 560, Article 6(2))*. All categories must be economically derivable for a representative reference period. From the perspective of the signatory associations, this new requirement for differentiation also offers the opportunity to indirectly align the basic payments more closely with environmental, climate, nature conservation and animal welfare aspects, a point explicitly acknowledged by the Commission, provided that an income-related disadvantage exists.

From the perspective of the signatory associations, in principle, a differentiation by groups of farms as well as by geographical area can be implemented with minimal bureaucracy for farmers and the agricultural administration by drawing on data that has already been collected and existing frameworks. Against this background, both approaches have advantages and disadvantages. The approach based on groups of farmers is more precise and more closely aligned with farm performance, but involves certain threshold issues, which could, however, be addressed, for example, through a graduated scale. The approach based on geographical areas using funding frameworks is easier for the administration to implement and would minimise the burden of monitoring, but may lead to free-riding effects due to the delineation of funding frameworks (e.g., at the local administrative district level). These are, however, significantly less pronounced than with the current undifferentiated basic payment.

The signatory associations advocate for differentiation according to the following criteria:

- **Strengthening diverse agricultural structures that promote biodiversity:** A more fragmented agricultural structure, which is preferable both for nature conservation reasons and for the preservation of the cultural landscape, is generally associated with greater management, planning and labour costs. Smaller and more fragmented plots, for example, require more crossings, more frequent turning manoeuvres and greater coordination in management. This results in labour costs that are roughly twice as high[5] .

- **Strengthening permanent grassland:** Farms with a high proportion of permanent grassland generate, on average, lower direct revenues than arable farms, whilst at the same time incurring high maintenance costs. They often manage sites of high conservation value and, in this respect, contribute to the preservation of important ecosystems through adapted management practices[6] .

- **Strengthening farms on slopes and in marginal locations:** Natural and site-specific disadvantages result in additional costs and/or loss of income. These typically include natural geographical disadvantages such as terrain, slope, altitude, floodplains, watercourses and drainage, aridity or low land value figures, as defined in the current compensatory allowance scheme. Regions with area-specific disadvantages have a 26 per cent lower income per worker compared with farms in non-disadvantaged regions[7] .

[5] https://www.gutachterring.de/wp-content/uploads/Kleine-Flaechen-kosten-Geld.pdf
[6] https://www.wissenschaftlicher-beirat-fuer-natuerlichen-klimaschutz.de/wp-content/uploads/20260521_WBNK-Studie_Dauergruenland.pdf
[7] https://agriculture.ec.europa.eu/document/download/0b0d8095-d120-4332-b1a1-256b555dcd2b_en?filename=analytical-brief-11-better-targeting_en.pdf p. 4

- **Strengthening land management in Natura 2000 areas:** Land management in Natura areas is characterised by land-use restrictions and obligations, which incur additional costs estimated at between €40 and €200 per hectare[8] . Natura 2000 areas cover approximately 10.7 per cent of Germany's agricultural land[9] ; extensive grassland in particular is found mainly in Natura 2000 areas.

- **Strengthening landscape features:** The preservation of landscape features measurably reduces productive land and also entails additional annual maintenance costs (at a rate of 4 per cent landscape features relative to the farm's total area, this amounts to around €100 per hectare[10]). Therefore, there should be a higher payment in regions or for farms with a particularly high number of landscape features.

- **Strengthening small and medium-sized farms:** Farms with limited land area have been shown to incur higher costs per hectare and generate lower incomes[11] . The so-called 'growth threshold', below which agricultural holdings are disproportionately likely to cease trading, is rising steadily[12] . At the same time, many and diverse farms make an important contribution to maintaining crisis-resilient food systems and vibrant rural areas, as well as to preserving the cultural landscape and carrying out landscape conservation[13] . It is therefore logical, in the interests of allocating the basic payments as targeted and efficiently as possible, to provide a top-up for smaller-scale farms, the total amount of which corresponds to the current redistributive payments no longer provided for in the Commission's proposal.

- **Strengthening farms with high animal welfare standards:** Livestock farms that already implement particularly high animal welfare standards today incur higher costs on average[14] . The now-discontinued federal programme to transform animal husbandry 'Bundesprogramm zum Umbau der Tierhaltung' (BUT) therefore also provided for support to cover these additional costs across the board, rather than providing purely investment-based support. Consequently, these farms should receive a bonus if they can demonstrate a maximum stocking density of 2 livestock units per hectare. The basis for such differentiation should be, at a minimum, the requirements for classification in the third tier (fresh air) or higher under the forthcoming Animal Husbandry Labelling Act, which must consequently be extended to all animal species in the near future.

The signatory associations also welcome, in principle, the Commission's proposal that Member States should be able to **grant** a top-up to the basic payment. Currently, the proportion of female farm owners in Germany stands at just 11 per cent[15] . In 2023, farms run by women achieved an average farm income per worker of €18,700. This is 42 per cent less than the average income of farms run by men[16] , which is due to a structural disadvantage faced by women in agriculture, e.g. through poorer access to credit or a lack of maternity protection. A similar situation applies to mixed farms. Between 2021 and 2023,

[8] https://mleuv.brandenburg.de/sixcms/media.php/9/RL-Ausgleich-Einkommensverluste-Natura-2000.pdf
[9] https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX%3A52020SC0373, p. 19
[10] Roth D & Berger W (1999): Costs of landscape conservation in agricultural areas. In: Konold W, Böcker R & Hampicke U (eds.): Handbook of Nature Conservation and Landscape Management – ecomed-Verlagsgesellschaft, Landsberg.
[11] https://www.thuenen.de/media/publikationen/thuenen-workingpaper/ThuenenWorkingPaper_96.pdf (p. 30)
[12] https://www.bmel-statistik.de/landwirtschaft/landwirtschaftliche-betriebe/betriebsstruktur-und-entwicklung
[13] https://www.haup.ac.at/wp-content/uploads/2025/04/5-2-5_Bericht-Lit-und-Praxisrecherche_final_.pdf
[14] In its impact assessment of the National Livestock Strategy, the Thünen Institute calculated that increased labour requirements, bedding, lower stocking densities and, in some cases, lower yields would consequently lead to production costs being around 10–20 per cent higher for most animal species. https://www.thuenen.de/de/themenfelder/langfristige-politikkonzepte/nationale-nutztierstrategie
[15] https://www.destatis.de/DE/Presse/Pressemitteilungen/2024/05/PD24_176_41.html
[16] https://agriculture.ec.europa.eu/vision-overview/women-farmers_en, p. 9.

mixed arable and livestock farms had one of the lowest average incomes at €24,600 per worker compared with all other types of farm[17] .

With regard to support for young farmers and new entrants to farming, the signatory associations reject an area-based top-up to the basic payments and refer to their previous statements on the forthcoming CAP, according to which such support should be fully and consistently linked to innovative and economically sound business concepts[18] , as is already provided for in the provision of start-up aid *(COM(2025) 560, Article 14).*

Finally, the signatory associations explicitly point out that the necessary improvements to the support policy in no way replace an effective reform of the Common Market Organisation aimed at strengthening farmers' position in the market.

With regard to detailed proposals for improving the Commission's proposals on the CAP after 2027, the signatory associations also refer to the previous proposals and demands of the Platform of Associations on CAP:

- Statement by the Platform of Associations: **Essential improvements to the European Commission's proposals for the CAP post 2027**
- Statement by the Platform of Associations on the European Commission's vision for agriculture and the MFF: **Common efforts to make quality production competitive and secure a crisis-resilient food supply!**
- Statement by the Platform of Associations on the CAP after 2027: **Shaping future – working together for a resilient, greener and fairer farming sector and agricultural policy.**

This statement was drawn up jointly by the associations forming part of the Platform of Associations on the European Union's Common Agricultural Policy. Coordination was undertaken by the Bund für Umwelt und Naturschutz Deutschland (BUND) in cooperation with the Arbeitsgemeinschaft bäuerliche Landwirtschaft (AbL). In addition to the points set out in this statement, the individual associations have, in some cases, further and more specific demands which they are pursuing. All statements issued by the Platform of Associations regarding the current and previous funding periods can be found on its website: **www.verbaende-plattform.de**

Contact for the associations' platform:
Viktoria Gaul, AbL, gaul@abl-ev.de
Daniela Wannemacher, BUND, daniela.wannemacher@bund.net

[17] https://agriculture.ec.europa.eu/document/download/0b0d8095-d120-4332-b1a1-256b555dcd2b_en?filename=analytical-brief-11-better-targeting_en.pdf, p. 13

[18] See the Association Platform's statement on the CAP, November 2025 – **Essential improvements to the European Commission's proposals for the CAP post 2027,** and the Association Platform's statement on the CAP after 2027: **Shaping future – working together for a resilient, greener and fairer farming sector and agricultural policy**


Albert Schweitzer Stiftung
für unsere Mitwelt


AbL
Arbeitsgemeinschaft
bäuerliche Landwirtschaft e.V.


BAUMLAND
mehr Gehölze in die Landwirtschaft


bio
kreis


Bioland


BUND


BUND
Naturschutz
in Bayern e.V.


BOLW
Bund Ökologische
Lebensmittelwirtschaft


BBN
Bundesverband Beruflicher Naturschutz e.V.


BDM
Bundesverband Deutscher Milchviehhalter e.V.


JUNGE LANDWIRTSCHAFT
SEIT 2012
BÜNDNIS


demeter


Deutsche Umwelthilfe


DEUTSCHER BERUFS UND ERWERBS
IMKER BUND
SOLTAU 1928


DNR
DEUTSCHER
NATURSCHUTZRING


DEUTSCHER TIERSCHUTZBUND


DVL
Deutscher Verband für
Landschaftspflege


GERMANWATCH


GREENPEACE


KLB


KLJB
Katholische
Landjugendbewegung
Deutschlands


LEAGUE FOR
PASTORAL
PEOPLES AND
ENDOGENOUS
LIVESTOCK
DEVELOPMENT


Manfred-Hermsen-Stiftung
für Natur und Umwelt


Naturland


NABU


Nationale
Naturlandschaften
Verband Deutscher Naturparke e.V.


NaturFreunde
DEUTSCHLANDS


Neuer
Imkerbund


NEULAND
EHRLICHE HERKUNFT SEIT 1988


Slow Food
Deutschland


Solidarische
Landwirtschaft
sich die Ernte teilen


Succow
Stiftung
Partner im
GREIFSWALD
MOOR
CENTRUM


Tierschutz.
Weltweit.
VIER
PFOTEN


WEIDEWELT e.V.


GLS Treuhand
Zukunftsstiftung
Landwirtschaft

Contact details and points of contact for the signatory associations:

- **Albert Schweitzer Stiftung**
  www.albert-schweitzer-stiftung.de, Andreas Manz, a.manz@albert-schweitzer-stiftung.de
- **Arbeitsgemeinschaft bäuerliche Landwirtschaft e.V. (AbL)**
  www.abl-ev.de, Viktoria Gaul, gaul@abl-ev.de
- **BaumLand-Kampagne**
  www.baumland-kampagne.de, Malin Tiebel, kontakt@baumland-kampagne.de
- **Biokreis e.V.**
  www.biokreis.de, Simon Krischer, krischer@biokreis.de
- **Bioland e.V.**
  www.bioland.de, Carolin Pagel, carolin.pagel@bioland.de
- **Bund für Umwelt und Naturschutz Deutschland e.V. (BUND)**
  www.bund.net, Daniela Wannemacher, daniela.wannemacher@bund.net
- **BUND Naturschutz in Bayern e.V.**
  www.bund-naturschutz.de, Harald Ulmer, harald.ulmer@bund-naturschutz.de
- **Bund Ökologische Lebensmittelwirtschaft e.V. (BÖLW)**
  www.boelw.de, Peter Röhrig, roehrig@boelw.de
- **Bundesverband Beruflicher Naturschutz e. V. (BBN)**
  www.bbn-online.de, Christof Martin, c.martin@bbn-online.de
- **Bundesverband Deutscher Milchviehhalter e.V. (BDM)**
  www.bdm-verband.de, Hans Foldenauer, info@bdm-verband.de
- **Bündnis Junge Landwirtschaft e.V. (BJL)**
  www.buendnisjungelandwirtschaft.org, Willi Lehnert, willi@bjl-ev.de
- **Demeter e.V.**
  www.demeter.de, Jörg Hütter, joerg.huetter@demeter.de
- **Deutsche Umwelthilfe e.V. (DUH)**
  www.duh.de, Sascha Müller-Kraenner, mueller-kraenner@duh.de
- **Deutscher Berufs- und Erwerbsimker Bund e.V. (DBIB)**
  www.berufsimker.de, Klaus Ahrens, klaus.ahrens@berufsimker.de
- **Deutscher Naturschutzring e.V. (DNR)**
  www.dnr.de, Björn Pasemann, bjoern.pasemann@dnr.de
- **Deutscher Tierschutzbund e.V.**
  www.tierschutzbund.de, Louisa Geismann, geismann@tierschutzbund.de
- **Deutscher Verband für Landschaftspflege (DVL) e.V.**
  www.dvl.org, Jürgen Metzner, j.metzner@dvl.org
- **Germanwatch e.V.**
  www.germanwatch.org, Konstantinos Tsilimekis, tsilimekis@germanwatch.org
- **Greenpeace e.V.**
  www.greenpeace.de, Lasse van Aken, lasse.van.aken@greenpeace.org
- **Katholische Landjugendbewegung Deutschlands e.V. (KLJB)**
  www.kljb.org, Isabel Rutkowski, bundesstelle@kljb.org
- **Katholischer Verband für die Menschen im ländlichen Raum (KLB)**
  www.klb-deutschland.de, Bettina Locklair, bettina.locklair@klb-deutschland.de
- **Liga für Hirtenvölker und nachhaltige Viehwirtschaft**
  www.liga-fuer-hirtenvoelker.org, Günther Czerkus, czerkus@das-buero.online
- **Manfred-Hermsen-Stiftung**
  www.m-h-s.org, Stefanie Hermsen, stefanie.hermsen@m-h-s.org
- **Michael Succow Stiftung**
  www.succow-stiftung.de, Sophie Hirschelmann, sophie.hirschelmann@succow-stiftung.de

- **NaturFreunde Deutschlands**
  www.naturfreunde.de, Joachim Nibbe, nibbe@naturfreunde.de
- **Naturland - Verband für ökologischen Landbau e.V.**
  www.naturland.de, Marcus Nürnberger, m.nuernberger@naturland.de
- **Naturschutzbund Deutschland e.V. (NABU)**
  www.nabu.de, Phillip Brändle, phillip.braendle@nabu.de
- **Netzwerk Solidarische Landwirtschaft e.V.**
  www.solidarische-landwirtschaft.org, Andrea Klerman, aklerman@solidarische-landwirtschaft.org
- **Neuer Imkerbund e.V.**
  www.neuer-imkerbund.de, Jürgen Binder, praesident@neuer-imkerbund.de
- **NEULAND e.V.**
  www.neuland-fleisch.de, Jochen Dettmer, jochen.dettmer@neuland-fleisch.de
- **Renate Benthlin – Stiftung für Nutztierschutz**
  Franz-Theo Gottwald, renatebenthlin-stiftung@posteo.de
- **Slow Food Deutschland e.V.**
  www.slowfood.de, Rupert Ebner, rupert.ebner@slowfood.de
- **Verband Deutscher Naturparke e. V. (VDN)**
  www.naturparke.de, Jörg Liesen, joerg.liesen@naturparke.de
- **VIER PFOTEN – Stiftung für Tierschutz**
  www.vier-pfoten.de, Femke Hustert, femke.hustert@vier-pfoten.org
- **Weidewelt e.V.**
  www.weidewelt.de, Gerd Bauschmann, weidewelt@aol.com
- **Zukunftsstiftung Landwirtschaft**
  www.zukunftsstiftung-landwirtschaft.de, Benedikt Haerlin, haerlin@zs-l.de