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Statement by the Platform of Associations on the  
EU Commission's vision for agriculture and on the MFF

# Common efforts to make quality production competitive and secure a crisis-resilient food supply!

On February 12<sup>th</sup>, the European Commission published its key points for the Multiannual Financial Framework (MFF) 2028 - 2034 of the European Union (EU)<sup>1</sup>. This was followed on February 19<sup>th</sup> by the publication of its *"Vision for Agriculture and Food. Shaping together an attractive farming and agri-food sector for future generations"*<sup>2</sup>.

Both documents show that the EU's Common Agricultural Policy (CAP), as enshrined in the European Treaties, is to be organised as a truly performance-oriented policy in the future. Moreover, evidence is mounting that the European Commission is planning a far-reaching reorganisation for the next MFF, whereby several of the current independent funds, including the two CAP funds, shall be implemented in each of the Member States by means of a single national plan. In these plans, Member States would have to explain, based on indicators, which measures they intend to use to achieve the respective EU objectives. The aim is to focus more on economic incentives and less on general regulation. The European Commission's proposal would thus not only give Member States much greater room for manoeuvre, but also envisages a possible general restructuring of the EU budget, including the dissolution of the current two-pillar structure of the CAP and its instruments. As the main reasons for this proposal, the European Commission cites the need to reduce bureaucratic burden and increase the EU's flexibility in dealing with crisis situations and rapidly changing challenges.

## **1. Strengthening Europe as a common actor, not weakening it**

Irrespective of the current structure of the CAP and its instruments, the European Commission's proposal for a more performance-oriented policy in principle takes up a central demand of the signatory associations, the Strategic Dialogue and the Commission on the Future of Agriculture (ZKL), i.e. that the CAP must contribute much more than before to solving the EU's environmental, social and animal welfare challenges. The proposals could therefore provide an opportunity to finally reform and refocus the CAP, the development of which in the course of prior reforms has been far too timid when it comes to its environmental, social and animal welfare benefits. This reorientation is more necessary than ever, not only because

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<sup>1</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0046>

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0075>

of the growing climate crisis, the continuing loss of biodiversity, other adverse developments and the sluggish progress in the fields of ecology and rural development, but especially because of the ever-increasing loss of agricultural holdings and the lack of young people to start, take over and continue to manage farms.

In light of the experience of the last CAP reform in 2023, the signatory associations do point however out that a stronger focus on targets, indicators, performance and incentives does not automatically result in improvements. For example, the CAP had already been turned into a delivery model at the start of the current funding period, which is supposed to ensure indicator-based implementation of targets. In practice, however, it is evident that this has not yet led to a turnaround in the environmental, social and animal welfare challenges facing the agricultural sector – on the contrary. Instead of truly assessing EU Member States against their performance and the strict adherence to the prescribed obligations in the process of approving and regularly reviewing national CAP strategic plans, and ensuring that improvements are made where they fall short, agreed targets have been lowered or 'massaged'. One example of this is the EU requirement that at least 40% of MFF funds in the current funding period must be spent on climate action. The CAP's basic income support is considered 'climate-related expenditure' at a flat-rated 40 per cent, which is not justified due to a lack of public goods rendered in return.

Another example: The new instrument of eco-schemes, which was also introduced in 2023, is already a suitable complement to agri-environmental and climate measures (AECM), if designed coherently, to reward farmers for the delivery of effective environmental and animal welfare services on all their agricultural land in an income-generating and thus incentive-based way. So why have the Member States, but also the EU Commission in the course of approving and regularly reviewing the national CAP strategic plans, not ensured that the eco-schemes within the EU are designed to be ecologically effective and income-generating at full coverage?

In the view of the signatory associations, the examples cited show that the proposed flexibilisation and renationalisation may also pose a great risk of impending undesirable developments. This is all the more true in view of the fact that transferring even more responsibility to the individual EU Member States would very likely lead to a situation in which

- the level of ambition of the environmental, social and animal welfare objectives of the Common Agricultural Policy (CAP) would decrease, as the incentive to increase the individual competitiveness by setting low standards increases;
- there would be a patchwork of regulations within the EU, which would be even less comprehensible than today, particularly from the point of view of the farming practitioners;
- the national authorities, which in many cases are already overburdened in the current CAP funding period, will face additional bureaucratic burdens as

transferred responsibilities also increase the need for regulation in the individual EU member states;

- there would be setbacks in the often desired and useful harmonisation of the EU internal market;
- the achievement of EU objectives is not guaranteed, as the EU Commission cannot ensure that target attainment is sufficiently evaluated and monitored;
- the European Commission must be strengthened politically and technically as a review body in order to appropriately raise the bar when approving national Strategic Plans and to be able to intervene in a regulatory capacity via delegated acts.

Moreover, a particular risk for nature, the environment, livestock and rural development is emerging, if in the struggle between the European Commission, the Council of Agriculture Ministers and the Agriculture Committee of the European Parliament to preserve the independent CAP, the European Agricultural Guarantee Fund for Agriculture (EAGF, the current first pillar) was to be ultimately preserved and the European Agricultural Fund for Rural Development (EAFRD, the current second pillar), of all things, were to lose out at the EU level and fall by the wayside in the tug-of-war over the design of the single national plan. This would be disastrous and must be avoided.

The signatory associations also emphasise the special value of the CAP as the EU's most communitised policy field. In times of increasing global crises, that which is COMMON within the jointly financed CAP must therefore be further expanded, not dismantled. This is the only way to strengthen and maintain EU cohesion in the long term.

- ***The EU Commission must continue to provide EU Member States with clear guidelines in the MFF and the CAP on the use of public CAP funds in the interests of environmental protection, climate mitigation and animal welfare as well as social justice and economic stability. These guidelines must ensure an increasing level of ambition to preserve natural production resources in order to secure our food supply in the long term and make it resilient to crises.***

## **2. Food security cannot be achieved without resource protection**

In its proposals, the EU Commission does not mention the objectives of the Green Deal and the Farm to Fork Strategy. Instead, there is a renewed emphasis on global competitiveness as a strategic goal. The signatory associations consider this shift in priorities to be a major step backwards. Food security requires environmental protection, climate mitigation and animal welfare. Natural resources, as key production factors in the agricultural sector, must be protected and conserved in such a way that they continue to ensure a sufficient, high-quality and affordable food supply in the medium and long term. In the absence of protections for our natural resources, food security cannot be achieved and will instead be seriously jeopardised. The special reports by the European Court of Auditors on climate and

environmental protection in the CAP<sup>3</sup> and on adaptation to climate change<sup>4</sup>, as well as the OECD report on the environmental performance of the agricultural sector<sup>5</sup>, are examples of the gap between the EU's aspirations and reality when it comes to environmental protection, climate mitigation and animal welfare. The EU cannot afford to allow this gap to widen further, especially in the context of sustainable food security.

The signatory associations are also convinced that, from an economic perspective, an isolated focus on global competitiveness in the CAP is a dead end. The reasons for this are (1) the comparatively high labour costs in the European farming sector, which are likely to increase further, and (2) the comparatively small-scale structure of agricultural land and the associated high production costs. In short, in the long run the vast majority of EU farmers will not be able to compete on the world market. This is all the more true at a time of increasingly scarce financial resources and the threat of a reduced CAP budget, which in the past has often helped to keep European agriculture artificially competitive in the global markets.

The aim of the 'Farm to Fork' strategy *“to reward those farmers, fishers and other operators in the food chain who have already undergone the transition to sustainable practices, enable the transition for the others, and create additional opportunities for their businesses”*, has therefore, in the view of the signatory associations, not lost its relevance. What's more, the goal of strengthening the competitiveness of farmers and agri-food processors who produce high-quality food with particular respect for planetary boundaries must be strengthened, not abandoned. The guarantors of food security and a crisis-proof agricultural sector are those farms that provide a particularly high level of public goods as part of their agricultural activities by participating in eco-schemes and agri-environmental, climate and animal welfare measures (AECM); organic farms; farms in disadvantaged areas, and those that keep their livestock in a particularly species-appropriate and environmentally friendly manner; farms producing for “GMO-free” labels; farms containing small woodlands and agroforestry areas; farms that process and directly market their own products; farms that practise nature conservation in inter-farm cooperatives; farms engaged in community-supported agriculture as well as the artisanal food processing sector associated with all these farms. The future CAP must therefore significantly increase support for these farms, while considerably reducing bureaucracy, in order to ensure their long-term competitiveness.

- ***The EU Commission must prescribe a significantly increased minimum budget for eco-schemes and AECM (currently 25% and 35% of the respective pillar), which will increase steadily over the course of the funding period, starting with the immediate abolition of the rebate scheme, which further reduces the budget for eco-schemes under certain conditions.***

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<sup>3</sup> <https://www.eca.europa.eu/en/publications/SR-2024-20>

<sup>4</sup> [https://www.eca.europa.eu/ECAPublications/SR-2024-15/SR-2024-15\\_EN.pdf](https://www.eca.europa.eu/ECAPublications/SR-2024-15/SR-2024-15_EN.pdf)

<sup>5</sup> [https://www.oecd.org/en/publications/environmental-performance-of-agriculture-in-oecd-countries\\_2679ba38-en.html](https://www.oecd.org/en/publications/environmental-performance-of-agriculture-in-oecd-countries_2679ba38-en.html)

- ***The EU Commission must ensure an independent and large budget for rural development policy (currently Pillar 2) that is clearly focused on the (re)development of decentralised artisanal food processing and the strengthening of regional value chains.***

### **3. Necessary market regulation and funding should not be pitted against one another**

The signatory associations agree with the EU Commission that farmers must be put in a much stronger position than before to generate their income from the sale of their products. It is therefore quite incomprehensible that the EU Commission, when naming instruments to strengthen the position of farmers in the food value chains, has so far limited itself to the conclusion of written contracts within the EU Common Market Organisation (CMO) and protection against unfair trading practices in the UTP Directive. The signatory associations share the EU Commission's position that these instruments, if they are correctly designed, can make an important contribution to profitable producer prices and therefore support their implementation as part of the ongoing reform<sup>6</sup> of the market organisation. Limiting reforms in this regard to these instruments, however, is clearly not sufficient to avoiding market crises in the long term.

The signatory associations see profitable producer prices as an important prerequisite for the CAP's necessary focus on "*promoting positive environmental, social, and animal welfare outcomes for society*", as recommended by the Strategic Dialogue. Only when the vast majority of farmers are able to negotiate on an equal footing with dairies, abattoirs, mills, etc. and food retailers in the marketplace and achieve profitable producer prices, the agricultural sector will be sufficiently accepting the according advancement of the CAP to a necessary extent.

The signatory associations emphasise that an improvement in the farmers' currently comparatively below-average income position<sup>7</sup> through improved market rules must not lead to a reduced provision of CAP funding. The "*investment gap in the agricultural sector*" for the delivery of "*digital, green and energy transitions*" of "*around EUR 62 billion*", as mentioned by the EU Commission itself, makes it even clearer that the current level of CAP funding is urgently needed for the transformation of the agricultural sector. However, CAP funds imperatively need to be used in a more targeted way than has been the case to date. Their environmental and social effectiveness must be significantly increased. This is all the more important as the CAP must make a direct contribution to the implementation of the EU's Nature Restoration Regulation<sup>8</sup>. The signatory associations do not see the "*additional finance sources*" mentioned by the EU Commission, such as "*nature credits*" or an expansion of certificate trading, as an adequate substitute for qualification of the CAP, but rather as a risk of greenwashing.

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<sup>6</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52024PC0577>

<sup>7</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0075> (see page 3)

<sup>8</sup> [https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=OJ:L\\_202401991](https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=OJ:L_202401991)

- ***The EU Commission must maintain an independent CAP budget at the current budget level, but must use the funds in a more targeted and effective manner in line with the environmental and social challenges.***
- ***The EU Commission must establish an early warning system for market crises for all sectors of agricultural production as well as crisis instruments, including temporary, binding volume restrictions.***
- ***The EU Commission must require compulsory written supply contracts across Europe, at least for perishable foods such as milk, and make it easier to pass on the added value of sustainable products along the value chain.***

#### **4. Focus on performance and incentive-based support offers great opportunity**

The EU Commission proposes to further develop and strengthen the "*focus on performance*" already introduced in the 2023 CAP reform and a CAP with a stronger focus on incentives. The signatory associations expressly welcome this approach in principle. They point out that, in particular, the new instrument of eco-schemes introduced in the last CAP, if designed correctly, is capable of providing income-generating remuneration for farmers' environmental, climate and animal welfare achievements under the first pillar of the CAP. However, this requires a consistent application on the part of the EU Commission of the rating or scoring system<sup>9</sup> prescribed for eco-schemes, and a consistent approvals practice, especially for its incentive based remuneration<sup>10</sup>.

The signatory associations are in agreement that the subsidies for the so-called basic income support (basic payment), which to date have largely been flat-rate payments, clearly contradict the desired "*focus on performance*". The EU Commission is therefore called upon to as soon as possible present a timetable on how the basic payment funds are to be gradually converted into instruments in line with the desired "*focus on performance*" (eco-schemes and AECM). In addition, the basic payment funds, which will be reduced as a result, must be redirected as quickly as possible to "*income support for those [farmers] who need it most*", in line with the recommendations of the Strategic Dialogue. The EU Commission's statement that "*degressivity and capping will be considered*" falls far short of this and needs to be specified. The signatory associations therefore propose an agricultural structures factor which, in all schemes, contributes to ensuring that participation in the CAP is particularly worthwhile for those farms most in need of support and that agricultural funding thus be used effectively.

While the signatory associations clearly agree with the approach of a stronger "*focus on performance*", they believe that this should not lead to the existing minimum requirements (conditionality) for receiving CAP funding simply being abolished. In recognition of the desired reduction in red tape, the signatory associations are in favour of streamlining these to essential requirements and of increasing their efficiency.

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<sup>9</sup> See Art. 31 (8) Strategic Plans Regulation

<sup>10</sup> See Art. 31 (7a) Strategic Plans Regulation

- ***The EU Commission must ensure that the premia levels of the eco-schemes are designed to be income-generating for agricultural holdings with respect to all eligible acreage.***
- ***The EU Commission must ensure that agri-structural, socio-economic and location-specific aspects are taken into account when calculating premiums for eco-schemes and AECM.***
- ***The EU Commission must set out a timetable for a transitional model in which basic income support is completely phased out in favour of effective performance-related payments and, in the meantime, is used in a targeted way.***
- ***The EU Commission must continue to adhere to the essential basic requirements for the receipt of subsidies. These include at least a minimum crop rotation, the maintenance of permanent grassland, the provision of non-productive land, the protection of peatlands and wetlands, and the requirements of current social conditionality.***

#### **5. Backing up the focus on generational change with concrete action**

The European Commission attaches great importance to the objective of making the agricultural sector more attractive for future generations. The signatory associations expressly support this objective and emphasise that targeted support for young people who wish to build a livelihood in the farming sector is not only important in order to rejuvenate the strongly ageing agricultural workforce, but that many young people in the farming sector also strengthen its innovative power in the direction of ecological and social change. Moreover, the preservation and promotion of an owner-managed family farming structure with many and diverse farms is closely linked to the challenge of finding a sufficient number of successors over the coming years for the many farms where succession is still unclear.

Due to the above-average capital intensity of the agricultural sector compared to other economic sectors, the economic hurdles for the establishment of an agricultural holding are extremely high. As a result, many young people are financially unable to establish or take over an agricultural holding even if they have a viable business plan, as due to the high capital requirements they lack the necessary equity to obtain loans. The often low profitability of the farming sector exacerbates this situation. It is therefore imperative that the promotion of generational renewal in the agricultural sector includes measures to significantly improve young people's access to capital. In the view of the signatory associations, the extra premium for young farmers payable on top of the largely flat-rate area aid payment, which has characterised support for young farmers to date, is not only unsuitable for this purpose, but rather leads to windfall profits that do not meet actual needs.

To support generational renewal in a targeted way, it is not sufficient to simply increase the minimum budget for support programmes for young farmers, as was done in the last CAP reform, without setting targets for the targeted use of the funds. The promotion of modern technologies and digitalisation, often mentioned by the EU Commission in the context of

generational renewal, similarly does not solve the economic challenges faced by young people who aim to build livelihoods in the agricultural sector. Moreover, the promotion of generational renewal in the agricultural sector must not be misused as an unregulated gateway for risky technologies such as novel genetic engineering, which for many farms create dependencies and competitive disadvantages.

- ***In supporting young and new farm managers, the EU Commission must focus on a concept-based, non-area-related start-up premium and make it mandatory in all EU Member States.***
- ***The EU Commission must offer an interest-free guarantee scheme with very long maturities throughout Europe.***

### **6. Reducing red tape without lowering environmental, social and animal welfare standards**

The signatory associations expressly welcome in principle the plan to reduce bureaucracy in the agricultural sector. This applies in particular to agricultural practitioners. At the same time, the signatory associations emphasise that the reduction of bureaucratic burdens must not result in a further lowering of the CAP's level of ambition in environmental protection, climate mitigation and animal welfare, as happened in the course of last year's rollback. At that time, under the pretext of simplification, the minimum environmental standards to be met to qualify for the receipt of direct payments were rapidly lowered without a corresponding increase in the budget for voluntary measures in the eco-schemes or the AECM. This has led to significant setbacks in terms of the CAP's environmental and climate impact, without any noticeable reduction in the bureaucratic burden placed on farmers.

The signatory associations are convinced that the core problem of bureaucratic burden for agricultural holdings lies in particular at the implementation level. For example, applications for funding often require the same data to be provided as are already being collected in other contexts. In addition, user interfaces are neither intuitive nor error-tolerant, and are often so complex that farmers feel the need to seek external advice. From a practical perspective, it is of secondary importance whether a support measure for environmental protection, climate change mitigation or animal welfare is funded under Pillar 1 or Pillar 2 of the CAP. Nevertheless, farms are often confronted with completely different application forms. This is despite the fact that it would be particularly important for the combination of measures from the two pillars that these be presented together in the application. To date it is not even possible to deduce from the application system the expected premia levels for individual measures or for the whole farm. What's more, farms that implement a particularly high number of eco-schemes and AECMs are subject to a particularly high risk of inspections and sanctions, rather than being rewarded for their exceptional commitment.

The signatory associations expressly point out that the CAP derives its social legitimacy from the fact that it provides remuneration for the delivery of tangible public goods. They also reiterate that it is precisely the promotion of environmentally friendly farming practices that



ensures the long-term security of our food supply. If the rollback continues under the guise of cutting red tape, it will greatly undermine both the legitimacy of the CAP and our food security.

- ***The EU Commission must ensure that the application process in the EU member states is standardised and unbureaucratic, and that the expected premium levels are already indicated during the application process.***
- ***The EU Commission must ensure that the support measures under the first and second pillars are coordinated in a coherent manner and bring them together at the application level.***
- ***The EU Commission must implement a mechanism that ensures that the implementation of a particularly high number of support schemes pays off well in economic terms for the farm holdings concerned, instead of disproportionately increasing their bureaucratic burden.***

### **7. Consistently orientate trade policy and livestock husbandry towards quality production**

The orientation of agricultural policy towards the production of cheap raw materials for the global markets and the simultaneous dependence on imports is a general systemic misalignment from which the majority of farmers worldwide, as well as environmental protection, climate mitigation and animal welfare, have been suffering greatly for a long time. At a time of increasing global crises, the focus on exports and dependence on imports also poses a high risk to food security. The signatory associations therefore believe that the EU Commission is on the right track in pursuing “*a stronger alignment of production standards applied to imported products*”. However, it would be a mistake to lower domestic production standards. In order to create new export opportunities as envisaged by the EU Commission, care must be taken to ensure that European agri-food industry exports do not undercut producer prices elsewhere – especially in the Global South – and that they do not cause any other dumping effects.

The creation of a “*work stream on livestock*” announced by the EU Commission and the “*proposals on the revision of the existing animal welfare legislation*”, which have also been announced, offer the opportunity to finally give livestock farms an economic perspective and, at the same time, to give new impetus to the urgently needed restructuring of livestock farming towards species-appropriate husbandry and environmental compatibility. The current CAP already offers a wide range of options to much more vigorously than before speed up the restructuring of livestock farming in the individual Member States and at the same time to economically strengthen the livestock farmers in this.

- ***In order to promote species-appropriate and environmentally friendly livestock husbandry, the EU Commission must always take the “livestock unit” reference value into account in addition to the “hectare” reference value when granting subsidies.***

- ***The EU Commission must always direct investment support towards particularly species-appropriate and environmentally friendly livestock husbandry.***
- ***The EU Commission must introduce mandatory labelling of food origin, quality, and production processes. To this end, it must introduce a European animal welfare label for livestock-based foods.***
- ***In its trade policy and trade agreements, the EU Commission must ensure that the EU's environmental and social standards are strictly respected. In addition, trade agreements must be designed to improve the incomes of farmers in Europe and in trading partner countries, particularly in the case of farms located in countries of the Global South. Moreover, care must be taken to ensure that imports of livestock-based products are produced under conditions that are equivalent to European animal welfare standards. Binding and verifiable mechanisms must be in place to ensure compliance with these standards.***

This statement was jointly prepared by the organisations associated with the Platform of Associations on the Common Agricultural Policy of the European Union. Its preparation was coordinated by the Friends of the Earth Germany (BUND) in cooperation with the family farmers' organisation of Germany (AbL). Some of the individual associations have formulated and have been pursuing more far-reaching and specific demands going beyond the basis of this statement. All statements by the Platform of Associations on the current and previous funding periods can be found on their homepage: [www.verbaende-plattform.de/en](http://www.verbaende-plattform.de/en)

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