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European food security between geopolitical shocks, productivity renewal and sustainability goals: current and future perspectives of Common Agricultural Policy

La sicurezza alimentare europea
tra shock geopolitici, rilancio della produttività
e obiettivi di sostenibilità: una prospettiva
sulla Politica agricola comune presente e futura

Given the uncertainty that characterises agricultural markets and is exacerbated by the repercussions of the current energy crisis and other disruptions affecting the agri-food supply chain, expectations for the future Common Agricultural Policy (CAP) are particularly high. The CAP is expected to contribute to long-term food security. This paper analyses how the EU intends to prioritise strengthening its internal productive capacity, which is considered a strategic instrument for safeguarding European interests. Within this framework, the focus is on the future CAP (2028–2034), which will be required to pursue the objectives established by Article 39 of the Treaty on the Functioning of the European Union by providing more targeted and efficient support to farmers, while striking a balance between more flexible environmental requirements and more adequate economic incentives. Subsequently, the paper examines some of the provisions proposed in the Proposal for the modification of the Common Market Organisation, which are aimed at establishing strategic food stocks to improve preparedness and crisis management in the event of threats to food security. Finally, while the CAP plays a pivotal role, the paper also considers the new Fertilisers Action Plan and trade agreements between the EU and third countries, which aim to strengthen the resilience and competitiveness of the European economy as a whole.

Keywords: food security, agricultural productivity, Common Agricultural Policy, income support, environment

Considerando il clima di incertezza dei mercati, aggravato dalle imprevedibili ripercussioni degli attuali problemi energetici che continuano a sconvolgere la filiera agroalimentare, le aspettative sulla prossima Politica agricola comune (PAC) sono sicuramente molto elevate per garantire il raggiungimento di una condizione di una *long term food security*. Il seguente articolo si propone di osservare come l'UE stia cercando di dare priorità al rafforzamento del potenziale produttivo interno, quale strategia di difesa degli interessi europei. In questo contesto, l'attenzione è posta sulla PAC, specialmente sulla futura programmazione 2028–2034, chiamata a perseguire le finalità dell'art. 39 TFUE, tramite un sostegno più mirato ed efficiente agli agricoltori e un bilanciamento tra obblighi ambientali più flessibili e adeguati incentivi economici. A seguire, si osservano i nuovi interventi normativi inseriti nella proposta di modifica dell'OCM, volti a costituire riserve (o *stock*) di prodotti agricoli per rafforzare la preparazione e la gestione nelle situazioni di crisi per la food security. Infine, sebbene sia innegabile il ruolo della PAC, si dà brevemente conto anche del nuovo Fertilizers Action Plan e degli Accordi commerciali tra UE e Paesi terzi, mirati a contribuire alla resilienza e alla competitività dell'intera economia europea.

Parole chiave: food security, produttività dell'agricoltura, Politica agricola comune, supporto al reddito, ambiente

1. A framework of the impact of the current geopolitical context on the agri-food system

Conflicts, trade wars, and climate shocks have been disrupting the global agri-food system, characterised by a strong reliance on imports. The effects of these events are reflected in the volatility of the prices for both, the agricultural inputs and the agricultural products, resulting in increased food insecurity, particularly in the developing countries.¹

These developments also have significant implications for the European Union which relies on imports from the third countries of essential raw materials needed in the agricultural sector, as well as, due to lack of self-sufficiency, for the automotive and energy sectors. For example, the EU imports the key components required for the production of “clean energy.” To those belong aluminium and lithium, as well as the essential inputs for fertilisers, including the urea, which is fundamental for the cereal sector. It also imports some of the main commodities used in staple food production, such as cereals and oilseeds.

¹ According to the International Panel of Experts on Sustainable Food Systems (IPES) Report, these events and their consequences are defining a “new geopolitics of food”: IPES FOOD, *The new geopolitics of food. Navigating policies for resilient self-reliance*, 2026, <https://ipes-food.org/report/the-new-geopolitics-of-food/> [accessed on 12.05.2026].

The EU's reliance on external supplies became more evident during the COVID-19 pandemic. Despite the resilience of the agrifood chain and the relative stability of food prices,² the pandemic highlighted the interconnection between health, ecosystems, consumption patterns, and global food supply chains.³ Later on, following the outbreak of the war in Ukraine and the sanctions imposed on Russia, the EU faced a severe energy crisis, which significantly increased the industrial production costs, especially in the energy-intensive sectors. Moreover, the tariffs imposed by the USA since January 2025 have further affected the balance of the international trade and the stability of food supply chains, making the economic environment even more complex.⁴

Finally, the EU's vulnerability has acquired renewed attention following the blockade of the Strait of Hormuz, a strategic seaway through which oil, gas, and fertilisers produced in the Gulf region (approximately the 30/35% of the global urea, and roughly the 20/30% of the ammonia) reach the global markets.⁵

While the war in Ukraine caused a direct shock to the global food supply due to the role of Ukraine and Russia as major exporters of wheat, maize, and seed oils,⁶ the economic impact of the disruption in the Gulf region is mainly indirect. In a globalised economic context, although the countries

² European Commission, Contingency plan for ensuring food supply and food security in times of crisis, COM(2021)689 def., Brussels, 12.11.2021, p. 3. On this topic: M. D'Addezio, *Le filiere agroalimentari al tempo del COVID-19 in Europa e in Italia. Una sfida tra food security, ripresa e dinamiche dei mercati, tutela del lavoro e dei consumatori, Green Deal, incertezze climatiche*, "Przegląd Prawa Rolnego" 2021, no. 2, p. 183 ff.; P. Cavarzeran, *Covid-19 e agricoltura. La gestione europea della crisi nel contesto di transizione della Pac*, "Rivista di diritto agrario" 2020, no. 1, p. 925.

³ Among the numerous contributions on this topic: L. Costato, *Globalizzazione, Covid-19 e sopravvivenza*, "Rivista di diritto alimentare" 2021, no. 1, p. 7; L. Russo, *Emergenza Covid-19 e Politica agricola comune*, "Rivista di diritto alimentare" 2021, no. 1, p. 45 ff.; Y. Petit, *Covid-19: l'Union européenne en quête d'un soutien approprié pour le secteur agro-alimentaire*, "Revue de Droit Rural" 2020, no. 483, p. 3 ff.; T. Srogosz, *Systemy żywnościowe w kontekście Zrównoważonych Celów Rozwoju – kilka uwag w czasie pandemii*, "Przegląd Prawa Publicznego" 2020, no. 6, pp. 24–37.

⁴ For further analysis: B. Harithas et al., *"Liberation Day" tariffs explained*, Washington, DC 2025, <https://www.csis.org/analysis/liberation-day-tariffs-explained> [accessed on 16.04.2026].

⁵ FAO, *Global Agrifood Implications of the 2026 conflict in the Middle East. Impacts on energy and fertilizer trade, and food security*, Information note, 15 March 2026, p. 3, <https://openknowledge.fao.org> [accessed on 12.04.2026].

⁶ On the issue of food security following the Russian invasion of Ukraine: L. Russo, *Le "nuove" misure agroambientali della PAC 2023-27: quali novità?*, "Rivista di diritto agrario" 2022, no. 2, pp. 162–164; Y. Petit, *L'invasion russe en Ukraine et l'Union européenne face au défi de la sécurité alimentaire*, "Revue de Droit Rural" 2022, no. 504, pp. 20–27.

of this region are not the major producers of commodities, the disruptions affecting the energy supplies and logistic reverberate along the entire agri-food supply chain, resulting in increased prices from the production stage to the final prices of the consumer goods.

Therefore, from the European perspective, the main concern is not related to the physical availability of food or fertilisers, but rather to the price volatility, which hampers production planning and increases the costs associated with agricultural activities. Furthermore, as a ripple effect, the rising of the fertilisers prices may lead to lower agricultural yields, which not only exacerbates the pressure on consumer prices at local level, but also poses a risk for the food security. Such developments could undermine the objectives of the Common Agricultural Policy (CAP), as set out in Article 39 of the Treaty on the Functioning of the European Union (TFEU).

After briefly examining the impact of globalisation on the achievement of the food security, the paper aims to analyse how the EU intends to prioritise the strengthening of its internal productive capacity, considered a strategic instrument for safeguarding the European interests.⁷ Within this framework, the focus is on the future CAP 2028–2034, which will be required to pursue the objectives established by the Article 39 TFEU through a more targeted and efficient support for the farmers, as well as through a balance between more flexible environmental requirements and more adequate economic incentives. Subsequently, the paper examines some of the provisions proposed in the Proposal for the modification of the Common Market Organisation (CMO), aimed at establishing strategic food stocks. The proposed measures are intended to serve crisis management and ensure that the EU is prepared to counteract crisis situations that may affect its food security. Finally, although the CAP plays a pivotal role, the paper also takes into account the new Fertilisers Action Plan and the trade agreements concluded between EU and the third countries, aimed at contributing to strengthening the resilience and the competitiveness of the European economy as a whole.

2. Globalisation, CAP and food security

In light of the scenario briefly outlined above, it can be observed that the main dimensions of the food security⁸ and the right to adequate food,

⁷ The IPES Report provides for a rebuilding of “resilient self-reliance food system”: IPES FOOD, *The new geopolitics of food...*, p. 4.

⁸ FAO, *Rome declaration on World Food Security*, World Food Summit, Roma, 13 November 1996, <http://www.fao.org/docrep/003/w3613e/w3613e00.htm> [accessed on 13.05.2026].

namely availability, affordability, utilisation, and stability,⁹ are at risk of being undermined.

This risk also affects the CAP whose objective of ensuring food security, or the “availability of supplies,” as established by Article 39 TFEU, is closely linked not only to the increase in agricultural productivity through the technological development, but also to stabilising the agricultural markets, safeguarding a fair standard of living for the farmers, and ensuring reasonable prices for the consumers.

The absence of any requirement concerning the origin or provenance of food supplies leaves open the possibility of addressing structural production shortages, resulting from the environmental characteristics of the EU, as well as temporary declines in agricultural output caused by cyclical crises, through imports. From this perspective, free trade plays an essential role, enabling States to overcome shortages of raw materials and food products.¹⁰ Nevertheless, food security remains a fundamental objective of agricultural policy which should primarily aim at ensuring a sufficient level of productive autonomy within the EU.

The weakness of the system emerged when reliance on imports, originally conceived as a residual and emergency mechanism, became an integral – if not central – component of agricultural policy, ultimately displacing the primary objective of supporting and strengthening the Union’s domestic productive capacity. In this sense, it is evident that the EU’s food security and self-sufficiency¹¹ are strongly linked.

Historically, governments and the European Community prioritised the self-sufficiency as a key element in safeguarding the national security. The

⁹ Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR). It also incorporates the concepts of sustainability, food safety, cultural acceptability, and nutritional adequacy, as explained in the General Comment n. 12, Right to Adequate food, 12 May 1999, E/C.12/1999/5. For an accurate reconstruction: M. Alabrese, *Il regime della food security nel commercio agricolo internazionale. Dall’Havana Charter al processo di riforma dell’Accordo agricolo WTO*, Torino 2018, p. 1 ff.

¹⁰ A. Matthews, *Trade rules, Food security and the Multilateral Trade negotiations*, “European Review of Agricultural Economics” 2014, vol. 41, no. 3, pp. 511–535; M. Alabrese, F. Coli, G. Comai, E. van Ommeren, S. Schiavo, *Regulatory Alignment or Divergence? Food Security Provisions in the Agreement on Agriculture and in Preferential Trade Agreements*, “World Trade Review” 2026, p. 2.

¹¹ FAO, *Food security and food self-sufficiency as separate objectives?*, “Implications of Economic Policy for Food Security: A Training Manual”, 1999, <http://www.fao.org/docrep/004/x3936e/x3936e03.htm#4.2> [accessed on 13.05.2026].

original structure of the CAP fully reflected this objective through extensive public interventions, including price regulation, public food stocks, tariffs, and export subsidies, in accordance with the “principle of Community preference.”¹²

However, although the food security was one of the objectives underlying the liberalisation of the agricultural markets, as recognised in the Preamble of the Agreement on Agriculture annexed to the Marrakech Treaty establishing the WTO, it is undeniable that some negative consequences of this process were underestimated. Among these are the increased exposure of the agricultural production to the market fluctuations and price volatility, resulting not only from domestic disturbances but also from international disruptions. Another consequence has been the gradual reduction of the productive capacity following the transformation of the legal and economic instruments, which traditionally have characterized agricultural policies.¹³

In Europe, the Macsharry Reform of 1992 and the Fischler Reform of 2003 adapted the CAP to the new economic environment, through the introduction of the decoupled income support for farmers and the progressive reduction of the protection measures, including the tariffs.

These developments led to the gradual erosion of the traditional “safety net” which had previously supported production while safeguarding farmers’ incomes. From that moment onwards, the market, intrinsically characterised by uncertainty and instability, became one of the main sources of farmers’ income. Public intervention remained available only as a “lifeline” to be activated in case of severe market crisis.¹⁴

¹² The literature on this topic is extensive; among the most relevant contributions, L. Costato, *La preferenza comunitaria (art. 44, par. 2, del Trattato)*, in: L. Costato (ed.), *Trattato breve di diritto agrario italiano e comunitario*, Padova 1997, pp. 56–57; P. Borghi, *L’agricoltura nel Trattato di Marrakech. Prodotti agricoli e alimentari nel diritto del commercio internazionale*, Milano 2004, p. 22.

¹³ The Agreement on Agriculture established disciplines concerning market access, export competition measures, and domestic support to agriculture. On the impact of globalisation on the agri-food system and food security: P. Borghi, *Insicurezza alimentare e regole WTO*, in: E. Rook Basile, A. Germanò (eds.), *Agricoltura e in-sicurezza alimentare, tra crisi della Pac e mercato globale*, Milano 2011, p. 79; L. Costato, *Globalizzazione: perché, quando, come*, “Rivista di diritto agrario” 2001, no. 3, p. 331 ff.; M. Alabrese, *Il regime della food security...*, pp. 99–101; R. Budzinowski, *Prawo rolne między globalizacją i lokalnością*, in: D. Łobos-Kotowska (ed.), *Współczesne problemy prawa rolnego i żywnościowego*, Katowice 2018, p. 57 ff.

¹⁴ L. Costato, *La controriforma della PAC*, “Rivista di diritto agrario” 2010, no. 1, p. 376.

Under this framework, farmers were free to adapt to the changing economic environment by choosing more economic viable crops, including non-food crops such as energy crops,¹⁵ better suited to the characteristics and potential of their farms, or by deciding not to cultivate the land.

In the latter case, farmers were required to comply with the cross-compliance requirements, introduced by the Regulation (EC) No 1782/2003,¹⁶ maintaining their land in “good agricultural and environmental conditions,” in order to remain eligible for support payments.

As a result, the farming came to be conceived as a multifunctional activity, expected not only to produce agricultural products, but also to meet the collective demands for the environmental protection. Within this framework, the decoupled payments assume a dual function: on the one hand, they provide a minimum level of income support for farmers; on the other, they compensate them for the provision of environmental public goods.¹⁷

Although this shift broadened and diversified the objectives of the CAP, it gradually deprived the agricultural activities of a “safety net” for planning the agricultural production, which could still play a pivotal role in ensuring food security, within the context of increased globalised agricultural markets.¹⁸

¹⁵ On the tensions between food security objectives and energy policies: L. Costato, *La situazione mondiale in materia di energia, materie prime, ambiente e alimentazione*, “Agricoltura istituzioni mercati” 2007, no. 1, p. 13; F. Adornato, *Farina o benzina? Il contributo dell’agricoltura ad un nuovo modello di sviluppo*, “Agricoltura istituzioni mercati” 2008, no. 1, p. 5 ff.

¹⁶ Council Regulation (EC) No 1782/2003 of 29 September 2003 establishing common rules for direct support schemes under the common agricultural policy and establishing certain support schemes for farmers and amending Regulations (EEC) No 2019/93, (EC) No 1452/2001, (EC) No 1453/2001, (EC) No 1454/2001, (EC) 1868/94, (EC) No 1251/1999, (EC) No 1254/1999, (EC) No 1673/2000, (EEC) No 2358/71 and (EC) No 2529/2001 (OJ L 270, 21.10.2003); D. Bianchi, *La condizionalità dei pagamenti diretti o della responsabilità dell’agricoltore beneficiario dei pagamenti diretti nell’ambito della PAC*, “Diritto e giurisprudenza agraria e dell’ambiente” 2003, no. 11, p. 597.

¹⁷ F. Adornato, *Agricoltura plurale paradigma dell’Europa*, “Przegląd Prawa Rolnego” 2022, no. 1, p. 13 ff.

¹⁸ L. Costato, *Il nuovo diritto agrario comunitario: diritto agrario o diritto ambientale?*, “Diritto e giurisprudenza agraria, alimentare e dell’ambiente” 2007, no. 10, p. 578; F. Moreno Mozo, *Contradictions in the evolution of the CAP*, “Przegląd Prawa Rolnego” 2023, no. 2, p. 71; A. Jannarelli, *La nuova food insecurity. Una prima lettura sistemica*, “Rivista di diritto agrario” 2010, no. 1, p. 576.

3. Food security and farmers' income support: Renewed interest from the 2008 financial crisis to the CAP 2028–2034

The need to build a resilient agri-food system capable of ensuring long-term food security emerged prominently on the policy agenda with the CAP 2014–2020 Reform, adopted in the aftermath of the 2008 financial crisis, and was subsequently reinforced by the CAP 2023–2027.

However, the consequences of the current geopolitical context and the climate change have highlighted the inadequacy of the measures implemented, particularly with regard to the strengthening of the EU's domestic productive capacity.

Against this background, the proposal for the CAP 2028–2034 appears to acknowledge, at least in theory, the need to increase the agricultural productivity,¹⁹ in order to ensure a “long term food security”²⁰ considered as a fundamental prerequisite for enhancing the European competitiveness.²¹ As stated in the Communication “A vision for agriculture and food,”²² the proposal also recognises the need to refocus on targeted and efficient support for farmers, aimed at stabilising the farmers' income and at strengthening their position within the food value chain. In this way, the CAP should enable the continuation and maintenance of the agricultural activities, while also attracting a new generation of farmers.

This paper focuses primarily on the “degressive area-based income support,” provided for by Article 6 of the proposal, which is intended to replace the “basic income support for sustainability,” established by Regulation (EU)

¹⁹ European Commission, 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 Agriculture Policy for the period from 2028 to 2034, COM(2025) 560 def.

²⁰ European Commission, Proposal for a Regulation of the European Parliament and of the Council, establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028–2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509, COM(2025) 565 def., Art. 3, par. 1, lett. d.

²¹ M. Draghi, *The Future of European Competitiveness – A Competitiveness Strategy for Europe and The future of European competitiveness – In-depth analysis and recommendations*, https://commission.europa.eu/draghi-report_en [accessed on 13.04.2026].

²² For an analysis of this issue: A. Niewiadomska, *Agriculture in 2040 according to the European Commission Communication “A Vision for Agriculture and Food,” “Przegląd Prawa Rolnego” 2025, no. 2, pp. 123–134.*

No 2021/2115.²³ The Commission intends to improve the criteria governing the distribution and targeting of support, which have contributed to the creation of a “rent effect” benefiting large agricultural enterprises. Such enterprises generally already possess the financial resources and capital necessary to sustain their agricultural activities. Likewise, the reform seeks to address situations in which beneficiaries consider it economically advantageous to receive support payments merely by maintaining land in “good agricultural and environmental condition,” without assuming the risks associated with agricultural production.

The support is differentiated according to subjective criteria, as it is targeted to the “farmers who are the most in need,” in particular young and new farmers, women, family or small-scale farmers, mixed crop and livestock producers, and farmers operating in areas facing natural or other area-specific constraints.

The support is primarily directed towards farmers who actively carry out the agricultural activity on their holdings and actively contribute to food security, the economic viability of the farm and the conservation of the environment, while also allowing the access to complementary source of income. Indeed, small farmers whose principal activity is not agriculture may be considered eligible, provided that they maintain at least a minimum level of agricultural activity, as defined by Member States.²⁴

The payment granted per eligible hectare may be differentiated according to groups of farmers or geographical areas on the basis of objective and non-discriminatory criteria, taking into account farmers’ income from agricultural activity during a representative reference period.

Unlike the current system, it is no longer distributed on the basis of the payment “entitlements.” Instead, it is calculated according to a degressive mechanism based on eligible hectares, with a progressive reduction in payments for larger farms, with the aim of achieving a fairer distribution of support. The total amount of area-based income support granted to an indi-

²³ Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013, PE/64/2021/REV/1 (OJ L 435, 6.12.2021).

²⁴ P. Czechowski, A. Niewiadomski, *Conditions for the implementation of the Union support under the Common Agricultural Policy for 2028–2034*, “Przegląd Prawa Rolnego” 2025, no. 2, p. 138.

vidual farm should not exceed 100,000 EUR per year. In addition, Member States are required to provide an annual lump sum payment for small farmers, which may not exceed 3,000 EUR.

Finally, while a degressive area-based income support is included within the “Starter pack for young farmers” designed to promote the generational renewal, the proposal also provides that farmers who receive a retirement pension, are no longer eligible for this form of support.²⁵

4. Food security, economic sustainability, and environmental sustainability: What balance within the CAP?

The contribution of agriculture to the achievement of increasingly ambitious environmental objectives raises a crucial question: how can a balance be struck between a stronger environmental protection, which may constrain the production, and an increased productivity, which may entail higher environmental costs? Furthermore, it is necessary to strike a balance between the costs and income losses resulting from the compliance with the environmental requirements and the provision of fair economic incentives, aimed at encouraging the investments in more ambitious environmental practices.

Throughout the CAP Reforms, the maximisation of the environmental outcomes, promoted by the international documents (e.g. Rio Declaration²⁶) and placed at the centre of the main European Strategies for sustainability, including the Green Deal,²⁷ has led to the development of the so-called “green architecture.” Within the CAP structure, this architecture is primarily composed of the agro-environmental measures under the Second Pillar; the environmental conditionality which imposes environmental obligations

²⁵ This remains a highly debated issue. At the AGRIFISH Council meeting of 27 April 2026, Member States acknowledged the importance of promoting generational renewal in the agricultural sector, while emphasizing that such a goal should not be achieved to the detriment of farmers who have reached retirement age. See: <https://www.consilium.europa.eu/agrifish/2026/04/27> [accessed on 13.05.2026].

²⁶ Rio Declaration on Environment and Development, The United Nations Conference on Environment and Development, Having met at Rio de Janeiro from 3 to 14 June 1992, <https://www.cbd.int/doc/ref/rio-declaration.shtml> [accessed on 13.05.2026].

²⁷ The European Green Deal, Striving to be the first climate-neutral continent, https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en [accessed on 13.05.2026].

and requirements on farmers for receiving the CAP support; and, finally, the environmental-oriented payments provided under the First Pillar.

Regarding the latter payment, it is worth recalling the “greening” payment²⁸ introduced by the Regulation (EU) No 1307/2013.²⁹ This form of support was heavily criticised by the European Court of Auditors in 2017 because of the lack of a clear justification linking the environmental benefits generated to the costs and income losses incurred by farmers in complying with the relevant obligations.³⁰ Moreover, the evident overlap and redundancy of environmental commitments generated the so-called “deadweight effect,” making any significant improvement in the environmental performance of the CAP unlikely.

Within the CAP 2023–2027, the redistribution of the greening obligations, aimed at overcoming the shortcomings of that payment, has led to not only an enhancement of conditionality and the introduction of the eco-schemes, but also to the transfer of many of the concerns that had already emerged under the previous system.

This is evident, first, from the Court of the Auditors Report of 2024 which highlighted the failure of the green architecture to maximize environmental benefits.³¹ Then, it is also reflected in the amendments adopted in 2024 and 2025 to Regulation (EU) No 2021/2115 intended to address the consequences on the European agricultural activities of the adverse climate events and the Russian invasion of Ukraine, even before the outbreak of the recent disruption in Iran.³²

These amendments addressed the rigidity and complexity of conditionality requirements which were often difficult to adapt to specific farming realities and were excessively burdensome for small farmers.

²⁸ G. Strambi, *Greening*, in: L. Costato, F. Albinini (eds.), *Trattato breve di diritto agrario italiano e dell'Unione europea*, Milano 2023, p. 326 ff.

²⁹ Regulation (EU) No 1307/2013 of the European Parliament and of the Council of 17 December 2013 establishing rules for direct payments to farmers under support schemes within the framework of the common agricultural policy and repealing Council Regulation (EC) No 637/2008 and Council Regulation (EC) No 73/2009 (OJ L 347, 20.12.2013).

³⁰ European Court of Auditors, Special Report no 21/2017, *Greening: a more complex income support scheme, not yet environmentally effective*.

³¹ European Court of Auditors, Special report No 20/2024, *Common Agricultural Policy Plans Greener, but not matching the EU's ambitions for the climate and the environment*, par. 89.

³² Listed in order of publication: Commission Implementing Regulation (EU) No 587/2024 of 12 February 2024; Regulation (EU) No 1468/2024 of the European Parliament and of the Council of 14 May 2024; Regulation (EU) No 2025/2649 of the European Parliament and of the Council of 19 December 2025.

In light of these interventions, although the proposal for the CAP 2028–2034 confirms the European commitment to strengthen the environmental ambitions as an added-value in global competition, it also seeks to redesign the environmental instruments around three key principles: adaptation, simplification, and a balanced relationship between environmental, economic, and social sustainability.

Against this background, although the proposal introduces a new designation for the conditionality, namely “Farm stewardship” (Article 3 of the proposal), it continues to include the “Statutory Management Requirements (SMRs)” relating to climate, environment, public and plants health, animal welfare, and social obligations concerning agricultural working conditions. Moreover, the proposal marks a shift towards less prescriptive rules. For example, the “Good agricultural and environmental conditions (GAEC)” are replaced by the “protective practices,” defined by each Member State at national or even regional level, within the framework of the new National Regional Partnership Plan (NRP), taking into account the different climatic and environmental conditions.

The proposal therefore establishes a framework of objectives, rather than detailed prescriptions. For instance, it no longer imposes specific percentages of land use, such as the obligation under GAEC 8 established by Regulation (EU) No 2021/2115 to allocate 4% of arable land to non-productive features and areas.

To ensure greater flexibility, Member States may establish specific exemptions from the protection practices in their NRP plans, according to some objective and non-discriminatory criteria, including the type of crops, soil conditions, cultivation methods, or income loss incurred, without undermining their purposes or distorting the competition.

The proposal also allows Member States to introduce derogation in case of exceptional meteorological events, which prevents farmers from complying with the protective practices. These derogations are subjected to the same limitation provided for the exemptions above mentioned.

To address the problem of overlap among different environmental instruments, the eco-schemes and the agro-environment-climate commitments are merged into a single category of “agri-environmental and climate actions” as provided in Article 10 of the proposal.³³ This new form of support makes

³³ European Court of Auditors, Opinion 05/2026 concerning the proposals for a regulation of the establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034 and a regulation amending Regulation (EU) No 1308/2013, par. 49.

more evident its dual function as both a reward and an incentive for the farmers who voluntarily adopt some environmental beneficial practices.

These actions consist of annual or multiannual voluntary management commitments undertaken by farmers and other beneficiaries, including commitments to maintain organic farming practices and to promote the extensification of agricultural production systems. They may pursue objectives such as improving water quality, protecting soil resources, enhancing biodiversity, and reducing greenhouse gas emissions. The payment also covers voluntary transition projects aimed at making the farming system more resilient. These projects may include organic farming and the extensification of livestock production systems. These new “agri-environmental and climate actions” preserve the same rationale underlying both the eco-schemes and the agro environmental commitments, provided by the CAP 2023–2027.

Indeed the support is granted only where the commitment undertaken by the farmer “goes beyond” the SMR, the minimum requirements related to the use of the fertilisers and plant protection products, animal welfare, and any other obligations established by national and European legislation.

5. Food security and the public food stockholding: a *déjà-vu*

Food security, as recognised by the FAO in the Rome Declaration,³⁴ depends not only on the physical availability of food, but also on its affordability, understood as the ability of individuals to access food on a regular basis and at reasonable prices.

According to the law of supply and demand, an excess supply of product on the market tends to depress prices, thereby risking the economic viability of agricultural activities and the remuneration of farmers. Conversely, when supply is scarce, prices tend to rise, making food products less affordable, particularly for the most vulnerable consumers. Hence, the need for market stabilisation aimed at ensuring a balance between affordable prices for consumers and adequate remuneration for farmers. These objectives essentially coincide with those set out in Article 39 TFUE, which the CAP has been required to pursue since inception.

Given the uncertainty that characterises agricultural markets, further exacerbated by the unpredictable repercussions of the current energy crisis and other disruptions affecting the agri-food supply chain, market management

³⁴ FAO, *Rome declaration...*

instruments such as public food stockholding programmes have attracted renewed attention. These instruments are capable of reducing price volatility for consumers while simultaneously providing greater income stability for farmers, thereby performing a shock-absorbing function.³⁵ Such programmes are typically based on the purchase of food products by a public authority. Reserves are accumulated when domestic prices experience a significant decline and are subsequently released onto the market through public distribution mechanisms in order to mitigate increases in average market prices.

Considering the experience of the CAP from its origins until the policy shift brought about by the 1992 Reform, the renewed interest in these instruments appears as a sort of *déjà vu*. Although the original CAP was often criticised as interventionist and contrary to free-market principles, it provided an important mechanism for planning agricultural production and stabilising markets.³⁶ Interest in public stockholding programmes has periodically resurfaced following the 2008 financial crisis,³⁷ the COVID-19 pandemic, and the Russian invasion of Ukraine, although without resulting in particularly significant legislative interventions.

Today, in light of the current geopolitical context, greater emphasis has been placed on crisis preparedness and management. Accordingly, the proposal for the reform of the CMO, published alongside the proposal for the future CAP, not only formally recognises the European Food Security Crisis Preparedness and Response Mechanism (EFSCM), but also proposes the introduction of a new chapter into Regulation (EU) No 1308/2013 concerning the availability of supplies in times of emergency and severe crisis (Articles 222 quater to 222 octies).³⁸

³⁵ IPES FOOD, *The new geopolitics of food...*, p. 13. The report is based on case studies from India, West Africa, Canada, and Norway, from whose experiences it is hoped that governments around the world may draw inspiration. C. Manduna, S. Murphy, *Public stocks at the WTO, Making sense of food security and agricultural negotiations at MC13*, February 23, 2024, IATP, <https://www.iatp.org/public-stocks-wto>. [accessed on 16.05.2026].

³⁶ The European Community also supported public stockholding policies at the multilateral level, particularly during the Tokyo Round negotiations, in order to address the uncertainty affecting global markets as a result of the oil shocks of the 1970s and the ensuing global economic and food crisis. Cf. Views submitted by European Communities Delegation, Annex V, Group 3(e) – Report to the trade negotiations committee, MTN/5, 16 luglio 1974. https://www.wto.org/gatt_docs/.pdf [accessed on 20.05.2026].

³⁷ For a comprehensive analysis of the impact of the 2008 financial crisis on the agricultural sector, see the contributions collected in F. De Filippis (ed.), *Prezzi agricoli ed emergenza alimentare. Cause, effetti, implicazioni per le politiche*, Roma 2008.

³⁸ European Commission, Proposal for a Regulation of the European Parliament and of the Council, amending Regulation (EU) No 1308/2013 as regards the school fruit, vegetables

Under the proposal, Member States would be required to prepare national food security preparedness and response plans, aimed at preventing disruptions to supply chains. These plans should seek to ensure that agricultural products remain available, accessible, and safe during emergencies or severe crises at all territorial levels, while also preventing or mitigating disruptions throughout the agri-food supply chains.

Member States would also be required to establish and manage stocks of agricultural products while minimising market distortions. In particular, the volume of products held in reserve should be determined on the basis of predefined final targets; stock levels should be periodically reviewed in light of the identified supply chain vulnerabilities and risk assessments; and both the purchase and sale of stored agricultural products should be carried out at market prices.

Furthermore, the Commission would be empowered to adopt implementing acts establishing rules on coordinated actions for the creation and management of reserves. These measures may include the identification of categories of products eligible for stockholding, the development of joint risk assessments, and the establishment of early-warning mechanisms aimed at mitigating risks related to cross-border supplies and ensuring the continuity of supply chains during periods of disruption.

Finally, the proposal provides for the implementation of voluntary solidarity and mutual-assistance mechanisms through which Member States may make part of their reserves available to another Member State facing severe shortages of agricultural products.³⁹

6. Concluding remarks.

Food security: Towards the new CAP and beyond

At present, the need to achieve a sustainable transition of the agricultural sector, reverse the trend of the progressive abandonment of farming activities, and reduce the growing economic and political dependence on imports of agricultural products and production inputs from third countries has considerably raised the stakes for the EU.

and milk scheme ('EU school scheme'), sectoral interventions, the creation of a protein sector, requirements for hemp, the possibility for marketing standards for cheese, protein crops and meat, application of additional import duties, rules on the availability of supplies in time of emergencies and severe crisis and securities, COM/2025/553 def.

³⁹ The European Court of Auditors in the recent Opinion No 05/2026, par. 64, welcomes the new provisions, considering them capable of improving the European Union's preparedness and coordination in the event of emergencies.

Expectations regarding the future CAP are therefore particularly high, as it is expected to contribute to the achievement of long-term food security.

However, although the CAP remains an indispensable instrument, the European Union must adopt an effective strategy aimed at strengthening the security of the economy as a whole⁴⁰ to which agriculture is “closely linked” (Article 39(2)(b) TFEU). In an environment characterised by persistent uncertainty, the primary objective is to achieve an “open strategic autonomy.”⁴¹ This concept does not imply complete self-sufficiency or the closure of international trade (i.e. autarky), but rather the strengthening of the EU’s internal productive capacity, both industrial and agricultural, so as to enhance its resilience in the face of external shocks, as well as to improve its international competitiveness.

To this end, the recently adopted Fertilisers Action Plan represents a significant step forward, as it seeks to promote simultaneously the competitiveness of the European fertiliser industry and the sustainability of the agricultural sector.⁴²

The Plan combines short-term measures aimed at addressing immediate challenges and ensuring the availability and affordability of fertilisers with medium and long-term actions designed to support domestic production, promote a more sustainable and efficient use of nutrients, and facilitate the transition towards sustainable and low-carbon fertilisers.

Short-term measures focus primarily on supporting farmers through the instruments already available under the CAP 2023–2027 framework. In order to ensure liquidity and sustain agricultural production, the Plan provides for targeted extraordinary support for the European farmers most severely affected by current market conditions through the existing CAP crisis-management instruments.

Furthermore, the Commission envisages the adoption of a dedicated CAP package aimed at enabling Member States to make full use of the support available under their current CAP Strategic Plans. Additional provisions are intended to increase flexibility regarding advance payments to beneficiaries,

⁴⁰ European Commission, *Joint Communication to the European Parliament, the European Council and the Council on “European Economic Security Strategy”*, JOIN(2023) 20 def., Brussels, 20.06.2023.

⁴¹ European Commission, *Strategic Foresight – Charting the course towards a more resilient Europe*, COM(2020) 493 def., Brussels, 9.09.2020, p. 15.

⁴² European Commission, *Fertiliser Action Plan: Partnership for ensuring the availability, affordability and strategic autonomy in home-grown EU fertilisers*, COM(2026) 310 def., Strasbourg, 19.05.2026.

thereby allowing farmers to continue meeting their financial obligations towards banks and input suppliers under exceptional circumstances.

Member States are also encouraged to develop and finance, within their CAP Strategic Plans, either a new eco-scheme or an adaptation of existing ones, as well as agri-environment-climatic commitments, aimed at improving the fertiliser-use efficiency, promoting the sustainable use of recycled nutrients, and strengthening farm resilience.

In addition, Member States are invited to allocate greater financial resources, within the existing CAP budgetary framework, to investment measures supporting a more efficient and sustainable use of fertilisers, including organic farming, precision agriculture, and other innovative production techniques.⁴³ The Plan also recognises the strategic importance of establishing fertiliser reserves. Unlike oil, fertilisers are not covered by any global reserve mechanism, making disruptions in production or transportation particularly difficult to manage and potentially more damaging for agricultural production.⁴⁴

Finally, consistently with the “open” dimension of strategic autonomy, the EU must strengthen its relations with international trading partners in order to enhance economic security, promote resilient and sustainable value chains, and reinforce a rules-based international economic order founded on multilateral institutions.

As noted above, the EU has become increasingly aware of the vulnerabilities affecting European economic security and has therefore pursued, with renewed urgency, the conclusion of bilateral agreements with third countries in order to diversify supply chains and increase resilience against adverse and unpredictable events.⁴⁵ Between 2025 and 2026, several important trade negotiations were concluded, including agreements with Mercosur, India, Indonesia (through the Comprehensive Economic Partnership Agreement – CEPA), and, most recently, Australia. These agreements complement the EU’s existing trade framework with Canada (CETA) and Japan. Reference should also be made to the opening of the review process concerning the Deep and Comprehensive Free Trade Area (DCFTA) with Ukraine and to the agreement reached with the United States aimed at limiting the escalation of tariff measures.

Although these agreements contribute to further market liberalisation, it remains essential to develop adequate safeguard mechanisms capable of

⁴³ Ibid.

⁴⁴ FAO, *Global Agrifood Implications...*, p. 3.

⁴⁵ European Commission, *Joint Communication...*, p. 13.

protecting the internal market not only from imports of products originating from third countries that do not comply with the same safety and environmental sustainability standards required of European agricultural products, but also from excessive import flows capable of disrupting market equilibrium.⁴⁶

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⁴⁶ With regard to the agreement with Ukraine: A. Niewiadomska, *Agriculture in 2040...*, p. 126.

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