

Brussels, 11 September 2026

Subject: Integrating the EU Protein Plan into CAP national recommendations

To: Ms Elisabeth Werner, Director-General, DG Agriculture & Food

C.c. Ms Catherine Geslain-Lanéelle, Director for Strategy and Policy Analysis (AGRI A); Mr Gijs Schilthuis, Director for Sustainability (AGRI B)

Dear Director-General,

We, the undersigned organisations and networks, are writing to encourage DG AGRI to **ensure that the forthcoming Commission CAP national recommendations fully reflect and operationalise the priorities set out in the European Commission's recently published EU Protein Plan.**

Europe's dependency on imported protein feed for its intensive animal agriculture sector and on imported fertilisers or fossil gas for its fertiliser production is increasingly a geopolitical vulnerability as well as an economic one. The war in Ukraine has already shown how quickly major conflicts can disrupt grain, oilseed, fertiliser and logistics markets, while geopolitical tensions continue to threaten energy, shipping and commodity flows that underpin EU food production. In this context, over-reliance on imported raw materials such as high-protein feed crops and fertilisers leaves the EU food system exposed to price spikes and supply disruptions, undermining food affordability, resilience and strategic autonomy. **Reducing these dependencies will require boosting feed autonomy and closing nutrient cycles at farm or regional level** by supporting grazing and mixed farming systems, mainstreaming agroecological practices and expanding domestic leguminous protein-crop production, as well as **supporting healthier and more diversified diets.**

This vulnerability is being **compounded by the climate crisis**. Europe is the fastest-warming continent, and the succession of heatwaves and droughts across the Union is already affecting yields, water availability and production stability. In this context, **protein diversification, including a better balance between animal and plant protein production and consumption, can also contribute to climate resilience** by reducing pressure on land and water, improving food system resilience and helping the EU adapt to a hotter climate.¹

The Protein Plan published in July 2026 is therefore a welcome and timely initiative to strengthen Europe's food security and strategic autonomy. As its successful implementation will depend substantially on action by Member States, it is essential that **the Commission's national recommendations encourage Member States to reflect the Plan's objectives** in their National and Regional Partnership Plans, particularly through the CAP Chapter contained within them.

We therefore encourage DG AGRI to recommend that Member States:

- Support the development of sustainable EU plant-protein production, with a particular focus on legumes for human consumption, including through adequate use of coupled income support, by facilitating the recognition of producer and interbranch organisations for legumes, and via other relevant CAP instruments;

¹ European Environment Agency. [European Climate Risk Assessment](#) report. March 2024.

- Integrate protein diversification into national generational renewal strategies and young farmer Starter Pack measures, ensuring that new entrants have access to the incentives, investment support, knowledge and advice needed to establish diversified and resilient farming systems;
- Strengthen the downstream segments of protein crop value chains, including through investments in appropriate storage, processing and other infrastructure, as well as cooperation between farmers and other actors in the value chain, to create reliable markets for EU-grown protein crops, with a particular focus on legumes for human consumption;
- Support the transition towards, and maintenance of, grazing, mixed and agroecological and organic farming systems, with animal numbers and stocking densities in line with the carrying capacity of the land, with the aim of improving farm-level feed autonomy, reducing reliance on imported high-protein feed, and achieving more circular nutrient management. This should include appropriate use of payments for agri-environmental and climate actions (AECAs) and transition payments and investment support to help farmers meet the costs and risks associated with this transition.

In parallel, the Commission should encourage Member States to **stimulate demand for locally grown legumes for food consumption** through policies beyond the CAP, including public food procurement, dietary guidelines, fiscal incentives such as VAT adjustments, and other measures to create healthier and more sustainable food environments. Building on the examples from Denmark and the Netherlands, Member States could develop **national Plant-Based Food Action Plans and set targets for the ratio of animal- to plant-based protein in diets**, providing a clear framework and direction for the transition towards more sustainable and resilient protein consumption.

The upcoming CAP national recommendations are a crucial opportunity to move from ambition to implementation. We therefore strongly encourage DG AGRI to reflect the Protein Plan directly in its recommendations to Member States and to ensure that protein diversification objectives are integrated in a meaningful, operational and measurable way, with progress monitored through appropriate indicators – including an overarching EU-level aspirational target for the ratio of animal- to plant-based protein consumption (similar to the target set to increase the share of protein from oilseeds and protein crops produced in the EU and used as animal feed to 35% by 2035).

We thank you for your consideration and remain available to discuss this further and to share examples of policy measures that could be reflected in the recommendations.

Yours Sincerely,

Signatories:

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| 1. Animal Advocacy & Food Transition | 7. Mighty Earth |
| 2. Changing Markets Foundation | 8. Physicians Association for Nutrition (PAN International) |
| 3. European Vegetarian Union | 9. ProVeg International |
| 4. Fern | 10. The European Institute for Animal Law & Policy |
| 5. Foodrise | 11. The Vegetarian Society of Denmark |
| 6. Humane World for Animals | 12. Vegepolys Valley |