



Regenerating Europe from the Ground Up

**Joint Response to
Hansen's Agri-Food Vision
by European Pioneers of
Regenerating Forms of
Agriculture and Food**

Executive Summary

On 6 February 2025, EARA hosted a senior AgriFood workshop as part of their Regenerating Europe Tour, in order to build common ground across pioneering farmers, businesses and civil society representatives. This common ground covered a range of topics, and forms the basis of this joint response to Commissioner Hansen’s *Vision for the Future of Agriculture and Food*.

The signatories to this response see the Vision as an initial step towards European food security, sovereignty and strategic autonomy, but that it does not go far enough in its approach. The signatories agree that regenerating forms of agriculture will be key to achieving these outcomes.

The response addresses several key themes:

Regeneration

All regenerating forms of agriculture, including agroecology and Conservation Agriculture, focus on principles and outcomes. Singular practices without considering the holistic outcome can be ineffective, and at worst regressive in socio-environmental outcomes.

As such, practices should not form the basis of policy, but rather, the outcomes. The signatories welcome the Vision’s emphasis on allowing farmers to have more autonomy in their farming practices, but stress that policy measures must be designed in order to measure and incentivise these goals. It is of concern that the Vision, at many places, emphasises discussion about practices rather than results, which can result in either

unintended environmental outcomes or greenwashing.

EARA’s network of pioneering farmers are eager to share their experience with the Commission, in order to provide technical and practical support in developing policy.

Simplification

The signatories are concerned that the Vision’s emphasis on simplification risks being led astray. Simplification cannot become a byword for deregulation, particularly of environmental or social protections. It must be limited to administrative or bureaucratic load.

Data harmonisation

We encourage the Commission to develop a shared data infrastructure for Europe to assist in simplification. This would allow policymakers to have targeted policy outcomes and reduce reporting burdens.

EARA’s policy paper [Towards a farmer-centric CAP rooted in Agroecosystem Health](#) proposes a core set of satellite-based measuring tools which can track farm performance in a hands off manner. EARA is currently undergoing Europe’s largest scientific study on regenerating forms of agriculture to prove the correlation between two key spot measurements (photosynthesis and soil cover) and regeneration outcomes, alongside measurements over time.¹

¹ Preliminary results were shared during Regenerating Europe Week 5 - 7 February, and final results will be published in May.

CAP Reform

The proceeding elements can be used to understand a reform of the CAP to a results-based model, providing targeted support in order to ensure farmers are encouraged to transition to suitable regenerating forms of farming. We propose a transition pathway of a hybrid CAP system that is focused on finding an alternative based on strategic result-based indicators, working together with all stakeholders. These changes will strengthen European food security, sovereignty and strategic autonomy, by restoring soil fertility, reducing or eliminating external inputs, and restoring biodiversity.

Ecosystem service payments, alongside targeted support towards new and young farmers in SMEs will renew rural areas and farming generations. Stronger soils will provide resilience in the face of climate shocks and adverse weather effects, significantly mitigating water risks such as severe flood or drought and restoring biodiversity. Regenerating approaches, taking into account the whole of a food system, will provide better and longer lasting solutions than new and emerging technologies.

To support this transition to the regenerating forms of agriculture, investment support, crisis and risk management tools will be crucial, alongside transition insurance schemes lasting for 5 - 10 years.

Knowledge & Support

The Commission should develop better methods of clear, easy and accessible

communication to farmers to support the transition, bridging the communication gap between bureaucrat and farmer.

Knowledge sharing and peer-to-peer support networks will disseminate knowledge and provide the intangible support needed for a mindset change. EARA is an organisation made up of pioneering regenerative farmers, who are also local knowledge leaders,

Technology

New technologies will undoubtedly have a crucial role to play in the future of agriculture, but the signatories emphasise that relying on it for 'silver bullet' solutions is not the way forward.

Europe requires a mindset shift in terms of its food and agriculture system, and by addressing fundamental issues we can achieve outcomes that will be longer lasting and less reliant on increasing investments, external supply chains and the prospect of more unintended outcomes. Technology must support the transition, but not be the transition itself.

Next steps

EARA's complete response document addresses statements from the Vision in the same structure as the document itself, for the ease of review by the Commission.

We look forward to engaging with the Commission in greater detail on all of the policy topics covered in the document, in the spirit of cooperation and collaboration.

Signatories



Regenerativt Norge

REWE ARE THE GENERATION



Introduction	8
On Simplification	9
Harmonised Public-Private MRV: A unified approach to data infrastructure and results monitoring	9
1. Priority: Building an attractive sector that ensures a fair standard of living and leverages new income opportunities	10
1.1 A fair and equitable food chain	10
1.2 Fairer and better targeted support	10
1.3 Leveraging the opportunities of innovation that rewards	13
1.4 Building an ambitious investment agenda	14
1.5 Fostering entrepreneurship: a new generational renewal strategy	14
2. Priority: A competitive and resilient sector in the face of global challenges	15
2.1 Diversifying supply chains and promoting transformative resilience	15
2.2 Towards fairer global competition	15
2.3 Preparedness and risk-proofing agri-food sector	15
2.4 Reducing red tape to foster a competitive agri-food sector	16
3. Priority: A future-proof agri-food sector that is functioning within planetary boundaries	17
3.1 Where decarbonisation and competitiveness go hand in hand	17
3.2 Incentivising sustainability	17
3.3 Farming and Nature	17
4. Priority: Valuing food and fostering fair living and working conditions in vibrant rural areas	19
4.1 Fair living and working conditions across European rural and coastal areas	19
4.2 Valuing food: reestablishing the essential link between farming, territory and food, and harnessing the power of innovation	19
5. In response to the Vision's discussion on Research, Innovation, Knowledge and Skills	21
5.1 Digitalisation as a driver to further advance the transition	21
5.2 Knowledge, Research & Innovation as catalysts to change	21
5.3 Strengthen knowledge and innovation systems and support for advice	21
Conclusion	22
Appendix	23
Why EARA and signatories?	23

Introduction

As a coalition of pioneering farmers, businesses and civil society representatives, we are committed to driving ambitious and systemic agri-food reforms throughout Europe that benefit a broad spectrum of stakeholders. We welcome Commissioner Hansen's newly released Vision for The Future of Agriculture and Food, and stand ready to help turn its ambitions into tangible actions.

The signatories to this statement convened on 6 February as part of the European Alliance for Regenerative Agriculture's Regenerating Europe Week through a consensus-driven, sociocratically-inspired approach to identify both general and specific recommendations that address the key points.

While the Vision marks an initial step towards securing Europe's food security, sovereignty and strategic autonomy, it does not go far enough in its approach, and some outdated assumptions remain in the underlying logic. Given the accelerating rate of climate and biodiversity challenges, coupled with an increasingly tense and uncertain geopolitical situation, the Commissioner must act boldly, with purpose and determination. Europe's deteriorating climate and soil conditions, as well as its reliance on external inputs for agriculture, place the Union in an increasingly vulnerable position.

We encourage the Commissioner to engage with us in driving a path towards regenerating forms of agriculture. These approaches will restore soil fertility and biodiversity, and help stabilise Europe's water cycle while reducing reliance on external inputs. Regenerating forms of agriculture increasingly attract young farmers to the sector, as the disciplines all emphasise social regeneration, individual agency and innovation together with economic resiliency.² In terms of competitiveness, regenerating forms of agriculture align with consumer demands; however, without strategic autonomy, there will be no future competitiveness if our soils and water systems are no longer functioning.

We believe that with our guidance, a policy and market environment can be created that enables all of European agriculture to achieve what Europe's pioneers are already delivering: ~38% more sustainable (regenerating) Total Factor Productivity³. The necessary scaling of these pioneering innovations to all farmers in Europe is feasible. We estimate the necessary investments to enable each farmer (OPEX & CAPEX) would amount to 0,5% of the EU agrifood system's annual revenue.

² Please see the appendix for an overview of EARA and our explanation of regenerating forms of agriculture

³ Preliminary results are presented [here](#), at the 3.00h mark. The full study will be published in May.

This response is structured following the Vision’s four fundamental priority areas, flanking elements and its supplementary chapter on knowledge and innovation. The responses are based on consensus achieved by the signatories, and are limited to topics where consensus has been achieved. We will work further on growing and applying the consensus throughout the EARA Regenerating Europe Tour launched in February 2025 and will run through February 2027.

On Simplification

The Vision has identified ‘simplification’ as a key flanking element of the document, and different measures contain discussions about simplification.

The signatories submit that simplification cannot become a byword for deregulation, particularly of environmental or social rules and protections. Simplification must be limited to administrative or bureaucratic load. We are concerned, for example, that in *Farming and Nature* the Vision talks about a more agile regulatory environment only in the context of accelerating the introduction of biopesticides.

Harmonised Public-Private MRV: A unified approach to data infrastructure and results monitoring

As discussed in EARA’s policy paper [Towards a farmer-centric CAP rooted in Agroecosystem Health](#), it is possible to have a core set of measuring tools carried out from satellites in order to track farm performance in a hands-off manner, while retaining robust data integrity and capacity-building for farmers. Establishing a shared data infrastructure would enable policymakers to leverage these measurements to drive targeted policy outcomes, while simultaneously reducing administrative burdens for both farmers and institutions.

For this system to succeed, policy frameworks must transition from practice-based to results-based approaches. While this response does not delve into the specific mechanics of a core MRV system, the necessary technology and methodology are available. We will discuss and evolve these insights throughout our Regenerating Europe Tour,⁴ and encourage the Commission to engage with us on this topic.

⁴ *ibid.*

1. Priority: Building an attractive sector that ensures a fair standard of living and leverages new income opportunities

1.1 A fair and equitable food chain

- a. The signatories support actions to improve transparency in the food chain and thus support the creation of the new Agrifood Chain Observatory. Further measures should be established to ensure that the information gathered by the Observatory can translate into further action that reinforces fairer supply chains and bargaining power.
- b. The signatories support the Commission's position to ensure that "practices where farmers are systematically forced to sell below production costs will not be tolerated." Furthermore, these practices should be added via fast-track procedure to the UTP blacklist.

1.2 Fairer and better targeted support

- a. The signatories are encouraged by the shift from conditions to incentives in the future CAP. However, more innovative forms of conditionality are required, and support should be tied to measurable improvements in the ecological performance of farms over time.

Rather than being awarded for adhering to prescribed practices, farmers must be incentivised based on the results of their actions. The Vision rightly acknowledges that farmers need to have further agency to design practices that are tailored to their farms and context, but the Commission must take this one step further.

It is not the practices of farmers which are important, but rather the outcomes of such practices. This principle should form the basis for future CAP payments; ensure payments must be directed towards those who actively engage in food production and towards economic vitality, in a way that preserves and restores the environment. This approach will actually fulfil the Vision's stated goals of ensuring that Europe can become more strategically autonomous, reducing reliance on inputs from outside of the EU.

Additionally, it is critical that uncoupled financial support and ill-guided practice-based targeted support should be wound back and phased-out in the CAP. These practices represent an inherent unfairness in the system, skewed

towards large landowners, and represent a waste of public funds that fail to achieve goals.

- b. The signatories agree that there should be a redirection of payments towards farmers that actively engage in food production, the economic viability of farms and the preservation of our environment.

However, the Vision is not sufficiently clear as to how this is measured and what the weighting of these elements are. In order to preserve the Vision's overall objectives to ensure Europe's food security and sovereignty, it is crucial that the CAP promotes a transition to regenerating forms of agriculture, which will ensure the ability of future generations to continue to farm and make it attractive to the young and newcomers in the sector.

- c. In line with the point above, the signatories also support the need to streamline how CAP policy is implemented and the need to have simplified income support tools, particularly for small and medium-sized farmers. However, the signatories have a clear position that simplification should relate only to burden and complexity of accessing support, rather than a winding back of environmental safeguards.

EARA's policy paper [Towards a farmer-centric CAP rooted in Agroecosystem Health](#) shows in detail how coupling area-based payments to strategic results-based indicators can supply a plethora of policy solutions. These would be clustered over pedoclimatic regions, and tied to performance-based conditionality and fairness. Two key science-based metrics, photosynthesis and soil cover measurements, can be utilised as a proxy for performance in fields of productivity, income and the environment. Further empirical evidence of this approach is currently produced with scientists, business and farming pioneers throughout Europe.⁵ These measurements can be carried out by existing satellite technology, and aligns tightly with the Vision's flanking objective of simplification and innovation.

- d. The signatories agree that all farmers should benefit from instruments that pay for ecosystem services, but that the Commission must refine this further. Ecosystem services should be paid not only on a basis of 'costs incurred or income forgone',⁶ but on the value of the ecosystem (and health) services provided. In order for this to be conducted, results-based monitoring must be

⁵ Preliminary results are presented [here](#), at the 3.00h mark. The full study will be published in May.

⁶ As per Article 70, para. 4 of Regulation 2021/2115 (the CAP Strategic Plans Regulation)

carried out, and payments cannot be made simply for a particular practice if it is disconnected with the actual value provided.

Existing legislation allows the utilisation of strategic results-based incentive schemes, and this should be replicated as a key element in Pillar I of the CAP.⁷ In the interim, the existing ability to carry out these schemes should be encouraged.

- e. The signatories support the move of the CAP to be further directed towards those farmers who need it the most. We also agree that young, small and medium-sized farmers must be supported to preserve and renew robust rural areas and increase productivity of European agriculture. Measures such as degressivity and capping are imperative, and are included in EARA's result-based policy proposal to benefit young, new, small and marginal farmers most.
- f. The signatories also recognise that existing targeted support schemes and AECMs that are working as intended, should be identified and preserved.
- g. The signatories support the Vision's view that farms need to benefit from instruments such as investment support, crisis and risk management tools. In order to achieve the Vision's overarching policy objectives, investment support should be targeted at agroecological outcomes. This may include specialised equipment such as digital fencing technology, or landscape features such as water retention and erosion control elements.

Whilst the Vision states that all farmers should benefit from the above instruments, the signatories remind the Commission that it is small and medium farms who are in need of this support the most, and that a key objective is to ensure such enterprises flourish. We do not suggest that large farms are excluded from support, but that the priority should be for those who need support the most.

In line with the Vision's view that flexibility is required due to differences in farms and contexts, the Commission is encouraged to consider investments not only from an individual farm perspective but also from a landscape perspective. Farms are affected by neighbouring farms, landscape features and practices.

⁷ Article 70, Para. 5 Regulation 2021/2115 (the CAP Strategic Plans Regulation)

- h. The signatories encourage the Commission to develop better methods of clear, easy and accessible communication to farmers as to what subsidies, operational support and knowledge resources are available. Systems require digitalisation, integration and quality upgrades. Civil servants must also engage in training as to their communications with farmers, to bridge the gap between two very different worlds. New schemes must be communicated promptly to those who are impacted by the policy. As part of the Vision's commitment to building trust and dialogue, efforts must be made to link pioneering farmers with the Commission.

To this end, the Annual Youth Policy Dialogue should be changed to be more frequent than once a year. This is especially important given the different levels of access to the Commission that pioneering regenerative farmers have compared to entrenched special interests in the EU agri-food sector.

1.3 Leveraging the opportunities of innovation that rewards

- a. The signatories agree that new and young farmers must be rewarded for their results in innovation. However, all of these different schemes put forward by the Vision only make sense if their MRV tools are unified and linked, to avoid creating even more administrative burdens.

The Vision in this chapter makes references to 'agroecological farming practices', and farmers who 'maintain or transition to nature-positive practices.' It is imperative that the Commission understand that regenerating forms of agriculture, including agroecology and Conservation Agriculture, do not focus on specific practices but rather on principles and outcomes. Singular practices without considering the holistic outcome can be ineffective, and at worst regressive in socio-environmental outcomes. If the Commission is serious about achieving its goals of European food security, sovereignty, climate mitigation, adaptation and nature-positivity, it must measure and incentivise these goals. EARA's pioneering farmers stand at the ready to provide the technical and practical support to the Commission to further their understanding in these systems, transitions and outcomes.

Regarding various carbon and nature credit schemes, EARA and the signatories caution that these initiatives can divert attention from the fundamental need to reform the political and economic framework, which currently favours extractive agriculture over regenerating systems.

1.4 Building an ambitious investment agenda

- a. The signatories support the Vision's view that bold action is required to finance and de-risk the sustainability transition, and further call for a transition framework that includes investment support, insurances, debt reduction and restructuring mechanisms all anchored in an harmonised and synergised shared data language. Most importantly, the signatories strive for a transition insurance scheme for farmers lasting for 5 - 10 years (in reflection of the reasonable time needed in many cases to see ecological and financial returns on investment).
- b. Furthermore, the signatories agree that institutional and private sector investors need to join in on financing this transition through blended or stacking options. This can be made more efficient and effective, if a shared data language and infrastructure is implemented, as discussed in **simplification** above. These financing approaches should include debt restructuring programs, to ease farmer indebtedness and reduce exposure of the EU finance sector.

1.5 Fostering entrepreneurship: a new generational renewal strategy

- a. The signatories agree with the Vision on the importance of new and young farmers, and that access to land is a key barrier to generational renewal. However, we believe that the Vision has missed a discussion on tenancy rights for agricultural land. Short-term leases encourage short-term thinking, and discourage long-term actions to ensure long-term outcomes.

The signatories suggest that, for all leasing agreements covering farmland, ecological measurements should be taken at the start of the lease to establish baseline ecological standards. This will allow for accurate measurement of the change in the health and biological function of the land over time. These measurements can be used to promote the tenancy of lease holders and land stewards who achieve improvements during their land use period. It is again important to note that this should be part of the harmonised data infrastructure we discussed in **simplification**. This longer term planning also allows tenants and landowners to develop and implement more strategically autonomous and productive innovation, which will help fulfil the ambitions of the Vision.

- b. The signatories agree with the Vision's position that Member States can use national tools such as retirement schemes and tax incentives to encourage

youth migration to rural areas. However, tax incentives should be tied to rural entrepreneurship in regenerating forms of agriculture, which by its nature, has a strong focus on social regeneration as well. This element is essential in achieving the Vision's overarching objective of developing vibrant rural areas. Tax incentives should not be provided for extractive agriculture development in rural areas or further consolidation of agricultural holdings.

2. Priority: A competitive and resilient sector in the face of global challenges

2.1 Diversifying supply chains and promoting transformative resilience

- a. The signatories reiterate our view that regenerating forms of agriculture have a strong potential to significantly reduce or eliminate non-EU inputs while achieving resilient productivity at scale. Reducing our dependence on external inputs, and improving resilience through a shift away from extractive industrial agriculture, must be core principles guiding the Commissioner's decision-making processes when designing policy, including reforms of the CAP. The outcome of this will be farming that is more productive in food, fibre, income, ecosystem services and biodiversity.

2.2 Towards fairer global competition

- a. The pioneers are disappointed to see that the Commission has walked back from delivering its commitment to ensuring that hazardous chemicals banned in the European Union are not produced for export. We call on the Commission to honour its commitment and stop these exports.
- b. The signatories support the principle that the most hazardous pesticides banned in the EU for health and environmental reasons are not allowed back into the EU through imported products. However, the signatories would go further to remove the word "most" and extend this to chemicals other than pesticides as well.

2.3 Preparedness and risk-proofing agri-food sector

- a. The signatories note that the best way for Europe to achieve strategic autonomy, food security and overall resilience is to engage in regenerating forms of agriculture. This will best be incentivised through context-specific,

strategic results-based incentives. Policies must promote real transition to these forms of agriculture, guarding against the threat of greenwashing and co-opting without delivering change.

One of the fundamental goals of regenerating forms of agriculture is to build natural resilience within systems. In the face of accelerating climate change, restoring the soil's ability to absorb water is crucial in maintaining a stable water cycle and agricultural resource base. This will have a significantly greater long-term benefit than new genomic techniques or AI tools.

- b. The signatories support the Vision's statements on cooperation with institutional and private finance in order to manage risk, either on transition or generally in response to crisis. Crisis relief payments ought to be restructured to be fully geared towards adaptation; payments made should be used to assist in recovery and reconstruction in a way that shifts towards transition.

2.4 Reducing red tape to foster a competitive agri-food sector

- a. As discussed above, the signatories support simplification only to the extent that it is a reduction of unnecessary administrative burdens, but caution against simplification turning into an excuse for deregulation guided by special interests.
- b. The signatories support the Vision's view that Member States need to carry out impact assessments of regulations and policies. In our view, Member State reporting should focus not on disconnected results (such as euros per hectare under abstract categories), but on actual results: the economic, ecological and social impact. Again, having a shared set of measurements and a reliable, relatively hands-off approach to measuring ecological performance under the CAP would help facilitate this.
- c. Supporting a transition to regenerating forms of agriculture has the largest potential to accelerate the competitive advantage of the European agri-food system. Farms can produce goods which are more aligned with consumer demand for more balanced diets, and with the potential to have significantly increased margins as inputs are severely reduced. Strategically for Europe, it will also significantly reduce input dependency from outside of the EU. An added bonus not discussed by the Vision will be the reduction of public health spending, given the tight correlation between food quality, healthier diets, nutrient density and public health.

3. Priority: A future-proof agri-food sector that is functioning within planetary boundaries

3.1 Where decarbonisation and competitiveness go hand in hand

- a. In respect of the Vision's view of effective policies that reward good practices and tailored approaches, the signatories reiterate that it is not practices but the outcomes of practices which should be rewarded. The emphasis of policy instruments must shift away from looking at practices, which risk falling into the trap of often ineffective practice-based subsidies which characterise the current CAP next to non-targeted support.

3.2 Incentivising sustainability

- a. Voluntary benchmarking systems for on-farm sustainability assessments will only be of value if guided by the pioneering farmers and business insights on monitoring and enabling regenerating forms of agriculture. All data assessment must have a dual purpose, meeting both on-farm and broader policy or market data needs.⁸

3.3 Farming and Nature

The signatories wholeheartedly support the Vision in recognising that farmers need a mix of better targeted support from the future CAP, investments into nature-friendly solutions, more economic incentives, tailored advice and a meaningfully more simpler regulatory environment.

The signatories welcome the Commission's discussion on healthy soil and water management. However, we believe the Vision understates the scale of the problem by describing unsustainable soil management as an issue only "in some cases." Conventional farming practices have been a major driver of soil degradation, and it is crucial to understand that soil degradation and its consequences are the rule rather than exception.⁹

When discussing water, it is crucial to recognize that it operates within a cycle directly influenced by soil health and management. Water scarcity can be mitigated by improving soil's ability to infiltrate and retain moisture through

⁸ Again we reiterate a shared data infrastructure and analysis understanding is decisive for its broader value to the agrifood sector.

⁹https://www.nabu.de/imperia/md/content/nabude/landwirtschaft/230508-joint_position_paper_eu_soil_health_law.pdf

regeneration, the integration of landscape features and erosion control. Likewise, healthy, well-covered soil significantly reduces erosion risks during extreme rainfall events, helping to prevent widespread damage.

For example, vineyards in Valencia that integrate planned grazing of sheep and poultry withstood the rain event in 2024 without loss of soil, compared to neighbouring parcels¹⁰; had this been a more widespread practice, the scale of destruction seen there would have been significantly reduced.

Similarly, biodiversity can flourish and further evolve within and around regenerating forms of agriculture, as for example a new species of earthworm and a wild bee species that was believed to be extinct, were recently discovered in German and Austrian fields¹¹.

The Vision claims that alternatives to pesticides have not kept pace with the withdrawal of pesticide active substances, claiming that this could threaten the EU's ability to ensure food production. This claim is unscientific and incorrect, as proven by pioneering farmers across Europe.¹² Many have proven that they can maintain or improve productivity and profitability, whilst reducing or eliminating pesticides by adopting regenerating forms of agriculture.

The signatories underline the need for an ambitious reduction in harmful pesticide use, given their well-documented negative impact on human health, biodiversity, soil health and water quality. Pesticides also disrupt essential ecosystem services such as pollination and natural pest control. We stress that the impact of harmful pesticides on the environment and ecosystem services will pose severe risks for future food production.

Pesticides which are excessively toxic to health and the environment must be banned.

¹⁰ <https://www.agriculturaregenerativa.es/suelo-y-agua/>

¹¹ <https://www.lfl.bayern.de/verschiedenes/presse/pms/2025/368470/index.php>

¹² Preliminary results are presented [here](#), by NABU at the 2.40h mark and EARA at the 3.00h mark. The full study will be published in May.

4. Priority: Valuing food and fostering fair living and working conditions in vibrant rural areas

4.1 Fair living and working conditions across European rural and coastal areas

- a. The signatories support the Vision's acknowledgement that generational renewal depends on better access to land and capital, infrastructure and opportunities. We are also encouraged to see a discussion about mental health support in rural communities.

We look forward to seeing more concrete proposals, investments and strategies to achieve these Vision outcomes.

- b. The signatories propose the development of a framework for allowing institutional land (eg. municipal or Church-owned) to be leased long-term to Community Supported Agriculture or other forms of regenerating agriculture. There is the potential for enhancing land access for young and new farmers, which can be then linked to local public procurement policies, similar to Denmark's model of integrated local organics within public procurement.¹³

4.2 Valuing food: reestablishing the essential link between farming, territory and food, and harnessing the power of innovation

- a. The signatories support the Vision's commitment to re-establishing the link between food, territory, seasonality, cultures and local traditions. However, we believe that the Vision can be bolder in helping to achieve this across different levels through food sovereignty.

Products from regenerating forms of agriculture are inextricably linked to seasonality, locality and territory. To encourage the purchase of these products, and to ensure that healthy, fresh products are more affordable, these products should benefit from a lower fixed VAT rate, or be supported through vouchers and other affordability means.¹⁴ This would support not just European but also regional food sovereignty.

- b. The signatories support the Vision's proposal to strengthen the role of public procurement, and establish a best value approach.¹⁵

¹³ EARA Workshop Rural Livelihoods, Young and New Farmers c

¹⁴ EARA Workshop Market & Trade point e and f

¹⁵ EARA Workshop Market & Trade point h

- c. The signatories welcome the Vision's discussion about phasing out cages, but the Commissioner should be bolder and more ambitious in his approach to this. The phase out of cages should extend to other closed confinement systems (excluding necessary shelters), and serious steps must be taken to address the ethical and environmental issues posed by Concentrated Animal Feeding Operations.
- d. The signatories also draw the Commissioner's attention to the inextricable link between food and human health. The way food is produced affects the quality and nutrient density of that food. To reflect this, the Commission should commit to breaking down ministerial silos in order to facilitate better coordination and outcomes as well as invest in more research showing those linkages between food production and health outcomes. These combined policies should work towards nudging consumers to better dietary choices.

Institutions such as DG Env, DG Agri, and DG Santé should engage in cross-sectoral collaboration and successful examples should be shared on a regular basis.

- e. Food-as-medicine should be supported, and integrated (in practice and financially) into the conventional healthcare system. Tangible models such as farm-hospital, medically-tailored diets and food pharmacies should be integrated into healthcare systems.

The Commission should promote and finance ecosystem, food and human health literacy in general, to ensure greater awareness and understanding amongst the public and policy-makers as to how these systems are interlinked and how they relate to economic and societal health.

Horizon should finance agri-health approaches in the next research framework program and target calls in this round.

5. In response to the Vision's discussion on Research, Innovation, Knowledge and Skills

5.1 Digitalisation as a driver to further advance the transition

- a. Generally, EARA welcomes the emphasis on ensuring connectivity (alongside other infrastructure) in rural areas, as well as digital skills training. EARA is also supportive of the Vision's 'collect once, use multiple times' principle.

Digitalization should be focused on harmonizing and synergizing data infrastructures and making them easier, more cost-efficient and more useful to everyone involved. IACS, LPIS, GSA, JRC Farm Records all could benefit from a coalescing into a farmer-enabling shared knowledge interface of harmonised data of and for regenerating forms of agriculture. However, EARA stresses the importance of not relying on technology solutions as primary methods of effecting change.

The transition must first rely on establishing solid fundamentals in knowledge of regenerative farming practices, outcomes and methodology. Digital solutions can be a supporting tool, but are not a silver bullet to the systemic issues our food system faces.

5.2 Knowledge, Research & Innovation as catalysts to change

- a. The Vision's emphasis on NGTs as a key solution for developing "super crops" to enhance the EU's food security and sovereignty is severely misguided. No such crops currently exist, nor are they anywhere near large-scale deployment. Relying on yet another hypothetical silver bullet, likely to be controlled by a few consolidated corporations, only deepens the systemic challenges already affecting European agriculture.

5.3 Strengthen knowledge and innovation systems and support for advice

- a. The signatories welcome the Vision's focus on improving access to knowledge for farmers. In order to make agroecological and regenerative farming education competitive alongside the highly-financed and subsidized industrial agriculture educational model, subsidies should be made available for accredited educators or organisations who can support peer-to-peer learning between farmers, and for education and training for regenerative agriculture, both within established institutions and private organisations.

- b. Existing knowledge hubs and resources should be reinforced; publicly-funded platforms such as AKIS should be improved, promoted and made more accessible. AKIS should address relevant questions, provide practical science-based advice to farmers in a simple and coherent way. Grassroots initiatives such as the French Triple Performance platform should be actively supported and promoted, as peer-to-peer learning and knowledge sharing platforms can be easier to trust for other farmers.
- c. On-farm research hubs should be funded, especially for regionally-based agronomy educational institutions. These studies should also include placements on smallholder farms in regional areas.

Conclusion

We invite the Commission to respond to this communication, and we look forward to contributing further to the discussion and practical development of pragmatic and innovative policy solutions. EARA's Regenerating Europe Tour will be passing through a number of EU Member States, constantly evolving the shared consensus of all the relevant pioneers of the EU agri-food sector in the next two years, and we warmly invite the Commissioner to join the conversation.

Appendix

Why EARA and signatories?

The Vision rightly acknowledges the crucial role farmers play in ensuring Europe’s food security and sovereignty. Notably, it also recognizes that young, innovative, and entrepreneurial farmers must be supported to lead the transition towards an agri-food system that regenerates soils, strengthens communities and enhances competitiveness. EARA and signatories are made up of precisely these kinds of farmers, businesses and other relevant actors: leaders in their fields, innovators across diverse regenerating systems and local entrepreneurs serving their communities. EARA and its partner network are uniquely positioned to help develop the concrete policy and investment proposals needed to realize the meaningful goals of the Vision.

We can offer tools, and the knowledge and experience of Europe’s leading farmer innovators. Europe’s strategic autonomy and competitiveness are dependent on a strategic reform of the political-economic environment of farms in Europe. Let’s listen to the practical pioneers on how to best redesign that environment.

Regenerating forms of agriculture

