



Does the proposed CAP reform allow for a paradigm shift towards a greener policy?

Ilona Rac (Rac, I)¹, Karmen Erjavec (Erjavec, K)² and Emil Erjavec (Erjavec, E)¹

¹ University of Ljubljana, Biotechnical Faculty, Jamnikarjeva ulica 101, Ljubljana, Slovenia. ² University of Novo mesto, Faculty of economics and informatics, Na Loko 2, Novo mesto, Slovenia.

Abstract

Aim of study: The paper explores whether the legislative proposal for the EU Common Agricultural Policy (CAP) after 2021 and the novelty of comprehensive strategic planning at Member State (MS) level can bring about a greener, more multifunctional policy paradigm. While existing research has explored long-term policy change over the entire decision-making process, this study aims to demonstrate the usefulness of conducting policy analysis at the inception of the legislative procedure.

Area of study: The study applies to the European Union.

Material and methods: The research employs a qualitative method of policy analysis, using a combination of three theoretical frameworks – social learning, path dependency and intergovernmentalism. Extensive document analysis and in-depth interviews were applied to evaluate the proposed reform and gauge the responses of key interest groups.

Main results: The proposal holds potential for a substantial overall greening of the policy but will be strongly dependent on implementation at the MS level; the institutional framework provides space for increased environmental ambition, but does not guarantee it, as the proposed safeguards are too weak.

Research highlights: More accountability is required during the formulation and implementation of Strategic Plans. Due to strong elements of path dependency and intergovernmentalism, an overall paradigm shift at EU level is unlikely. Strengthening the role of MSs is weakening the commonality of the policy that guarantees at least minimal environmental standards.

Additional key words: Common Agricultural Policy; environment; policy paradigm; Strategic Plans; social learning; path dependency; liberal intergovernmentalism.

Abbreviations used: CAP (Common Agricultural Policy); CEJA (Conseil Européen des Jeunes Agriculteurs); COMAGRI (Committee on Agriculture and Rural Development); COMENVI (Committee on Environment, Public Health and Food Safety); COPA (Comité des Organisations Professionnelles Agricoles); COGECA (Comité Général de la Coopération Agricole de l'Union Européenne); EC (European Commission); ECA (European Court of Auditors); EP (European Parliament); EU (European Union); IEEP (Institute for European Environmental Policy); MEP (Member of European Parliament); MS (Member State); NGO (Non-governmental organisation); PD (Path dependency); SL (Social Learning); SWOT (Strengths, weaknesses, opportunities, threats). **Member States of the European Union:** AT (Austria); BE (Belgium); BG (Bulgaria); CY (Cyprus); CZ (Czechia); DE (Germany); DK (Denmark); EE (Estonia); EL (Greece); ES (Spain); FI (Finland); FR (France); HR (Croatia); HU (Hungary); IE (Ireland); IT (Italy); LT (Lithuania); LU (Luxembourg); LV (Latvia); MT (Malta); NL (Netherlands); PL (Poland); PT (Portugal); RO (Romania); SE (Sweden); SI (Slovenia); SK (Slovakia).

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Correspondence should be addressed to Ilona Rac: ilona.rac@bf.uni-lj.si

Introduction

For years, the public (Eurobarometer, 2018), consumers and environmental non-governmental organisations (NGOs) (*e.g.*, EEB *et al.*, 2018), researchers (*e.g.* Hart & Bas-Defosse, 2018; Lakner & Pe'er, 2018; Recanati *et al.*, 2019) and the European Court of Auditors (ECA, 2019)

have been criticizing the Common Agricultural Policy (CAP), demanding a paradigm shift towards an environmentally, socially and economically more sustainable policy. On June 1st, 2018, the European Commission (EC) published (EC, 2018a) legislative proposals introducing a new element to the CAP, namely comprehensive Strategic Plans at Member State (MS) level. Applying compulsory

planning – which was already established for Rural Development policy (Pillar 2) and in the fruit and vegetables sector – to the entire CAP arguably represents the greatest novelty of the reform proposal. The other new element proposed is a new green architecture, described by the EC as having the potential to bring about a radical greening of the policy.

The EC (2020) sees the proposal as ‘guaranteeing higher ambition on environmental and climate action’, as it is intended to introduce result-based, rather than compliance-based, policymaking. Within the “New Delivery Model”, common policy goals (priorities), indicators, eligible interventions and certain eligibility conditions will be set at the European Union (EU) level. MSs will determine national operative goals based on the assessment of particular needs, adaptations of measures and provisions for monitoring progress, all based on a clearly established intervention logic (Erjavec *et al.*, 2018). Importantly, all this is probably to take place in the context of substantially reduced EU funding (Matthews, 2018; EC, 2019).

Three different paradigms (Moyer & Josling, 2002; Alons, 2019) can be said to be currently competing for dominance as the CAP’s main ideational framework: the state-assisted (or mercantilist or dependent), the competitive (or market-liberal), and the multi-functional (or post-productivist). Environmental considerations are the main constitutive element of the multifunctional paradigm, which legitimizes financial support for the “European model of agriculture” (Potter & Burney, 2002; Potter & Tilzey, 2007; Midgley & Renwick, 2012). Numerous critics (see *e.g.*, Bohman *et al.*, 1999; Potter & Burney, 2002; Garzon, 2005) have claimed that multi-functionality has merely been a smokescreen to continue subsidization of the European farming sector – but could it become the prevalent paradigm? Can the “New Delivery Model” answer the demands of European society for a paradigm shift; will the new CAP lead to a ‘transition to a more sustainable agriculture’, as claimed by the Commission (EC, 2018b)? Why has the EC proposed such policy changes?

As no existing theoretical framework can independently explain changes of the CAP adequately (de la Rosa, 2010), in answering the above questions, we have analysed the legislative proposals (EC, 2018a) by applying and combining the insights of three theoretical models: Hall’s (1993) model of social learning (SL), which is suitable for identifying “major policy change” (Cairney, 2012); path dependency (Levi, 1997), which is useful for describing policy processes resistant to change, such as the CAP (Moyer & Josling, 2002); and intergovernmentalism, which offers insights into the balance of intergovernmental and supranational elements of policy, in our case the transfer of responsibility from the EC to MSs (Moravcsik, 1991).

Drawing on these theories, we attempted to explain the elements of the current proposal and predict the result of the reform process in terms of bringing about significant policy change. As the biggest flaw in the current system is arguably the weak environmental institutional framework (relevant measures, their content, budgetary allocation and monitoring/evaluation framework), we used the content and quality of the proposed institutional framework as an indirect indicator for such policy change. In addition, we garnered the responses of key interest groups, Members of European Parliament (MEPs) and Member States (represented in the Council of the EU), to gauge their policy preferences, as well as those of prominent analysts, who can offer additional insight into the potential direction of reform.

Existing research has explored long-term policy change over the entire decision-making process (*e.g.*, Moyer & Josling, 2002; Garzon, 2006; Nedergaard, 2008; Feindt, 2010); our study aims to demonstrate the usefulness of conducting policy analysis by using three theoretical models of change at the inception of the legislative procedure. Our analysis, using an approach that combines the abovementioned three models, thus attempts to comprehensively examine which elements of the legislative proposal and political environment demonstrate the potential of the proposed CAP to deliver the paradigmatic change required to bring about a substantially greener policy, as suggested by the Commission (EC, 2018c). We also provide tentative policy recommendations that could support this shift.

Material and methods

The context: key elements of the proposed reform

Three main topics (see Table 1) have dominated the public discussions surrounding the proposal: 1) the announced reduction in the CAP budget; 2) introduction of national strategic planning for the entire CAP; 3) changes in the environmental architecture of the policy. The latter two constitute the biggest substantive policy change.

A reduced budget

The Commission’s Multiannual Financial Framework (MFF) proposal tabled the largest overall reduction in the CAP budget so far, largely owing to Brexit and new budgetary considerations. It has proposed an overall reduction of 3% in current prices, which amounts to 15 in constant 2018 prices; the lion’s share of this reduction falls upon Pillar 2 (28%), but Pillar 1 would also see a substantial decrease (11%). The Commission also suggested that

Table 1. Main proposed changes of the common agricultural policy (CAP) – Summary

	Current system	Proposed system	Substantive change
Budget (total CAP, in 2018 constant prices†)	€ 382,855 million	€ 324,284 million	-15% [11% reduction in Pillar 1, 28% reduction in Pillar 2]
Strategic planning	Only in Pillar 2	Entire policy	Greater flexibility for MS but within constraints of common objectives; supervisory role for Commission
Green architecture	Cross compliance (Pillar 1 and some Pillar 2 payments); Green direct payments; AES (Pillar 2)	Enhanced conditionality, Eco-schemes (Pillar 1), AES (Pillar 2)	Enhanced conditionality replaces cross compliance and greening requirements

† Calculations by Matthews (2018). AES: agri-environmental schemes

it decrease cofinancing rates in Pillar 2 by 10% and accompanied this with the possibility for MSs to transfer up to 15% of their CAP allocations between direct payments and rural development, as well as an additional 15% from Pillar 1 to Pillar 2 for environmental and climate measures without co-financing (EC, 2018a; Massot & Negre, 2018).

Strategic planning for the entire CAP

Strategic Plans will draw on assessments of each MS's particular needs using SWOT (strengths, weaknesses, opportunities, threats) analysis. According to the proposal, each Plan will require prior approval by the Commission to ensure consistency with nine specific EU-level objectives outlined in the proposal, of which three are environmental (climate change mitigation and adaptation and sustainable energy; sustainable development and natural resources; biodiversity, ecosystem services, habitats and landscapes). MSs will independently define common elements of interventions in their Strategic Plans, as well as requirements of the new system of environmental "conditionality" (see below). Further, they will set target values and benchmarks for all common and specific indicators and choose instruments from the offered set based on a sound intervention logic specified for each specific objective. They will have to demonstrate comprehensiveness and conformity with goals in environmental and climate legislation and enclose a review of the environmental and climate architecture of their Strategic Plan. They will also have to show that the allocation of financial resources to interventions is proportionate to set targets. Importantly, there should be no backsliding in environmental and climate objectives (EC, 2018a).

Implementation will be carried out through a system of monitoring and review, under which MSs will prepare

annual performance reports using a system of indicators to be agreed at the Union level. In case of a more than 25% deviation, the Commission may demand of the MS to prepare an Action Plan with corrective measures. In extreme cases, when an MS formulates no Plan or it is inadequate, payments may be withheld. Conversely, a system to reward environmental and climate performance is also proposed, under which MSs meeting their targets will receive a "bonus" of 5% of their allocated rural development funds for 2027 (EC, 2018a).

"New green architecture"

The CAP's green architecture, which currently relies on cross-compliance (conditioning of some CAP payments upon compliance with certain other requirements, including environmental ones), greening requirements related to direct payments, and voluntary agri-environmental and climate measures, will be changed in form and content (Fig. 1); the new model will allow MSs to devise a mixture of mandatory and voluntary measures in both Pillars to meet the environmental and climate objectives defined at EU level.

Under 'enhanced conditionality', income support will be conditional upon observing a higher baseline standard of environmental and climate practices, subsuming both greening and cross-compliance requirements. Additional environmental/climate benefits will supposedly be achieved through flexible eco-schemes in Pillar 1 and agri-environment-climate schemes in Pillar 2 that will allow MSs/Regions to target their specific concerns.

Analytical framework

In this study, we applied policy analysis, a key method for examining and evaluating complex public policies and

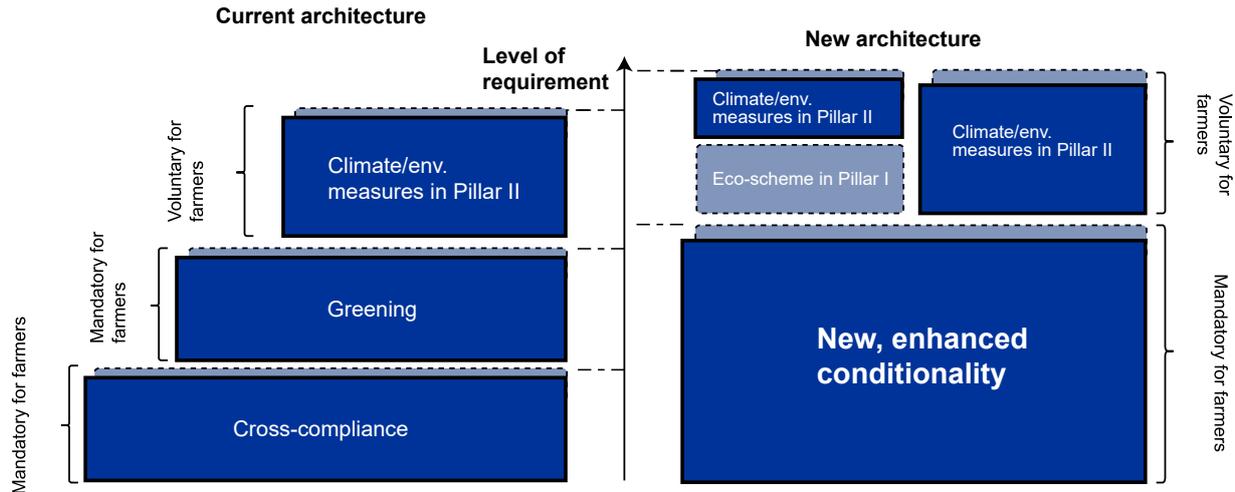


Figure 1. Current and proposed green architecture. Source: European Commission

suitable for determining how a policy will achieve a given set of goals (Sabatier, 1991). As there are no comprehensive theories on policymaking and analysis (Radin, 2000), we employed a combination of models that we find the most appropriate for explaining the CAP (Moyer & Josling, 2002; Garzon, 2006; Nedergaard, 2008; Feindt, 2010). While we are primarily interested in substantive policy change, theory studying European integration is also relevant due to the Commission's proposal to transfer some powers back to the MS level.

Social learning model

Hall's (1993) historical institutionalist concept of social learning (Coleman *et al.*, 1996; Coleman, 1998; Moyer & Josling, 2002; Garzon, 2006; Feindt, 2010), is the most widely deployed in studies on policy change in the CAP (Moysen *et al.*, 2017).

According to Hall (1993), SL is "a deliberate attempt to adjust the goals or techniques of policy in response to past experience and new information". He suggested that a stable policy paradigm, defined as "a framework of ideas and standards that specify not only the goals of policy and the instruments that can be used to attain them, but also the very nature of the problems that they are meant to be addressing" (ideational framework), might begin to weaken if it ceases adequately to provide solutions for policy problems. As anomalies accumulate, policy makers will alter instrument settings and experiment with new instruments to address them. Continuing failure will convince actors that serious anomalies cannot be addressed within the established paradigm. Consequently, the authority of the relevant policy community becomes fragmented and politically contested (Feindt, 2010). The change in the ideational framework (hierarchy of goals) is thus

preceded by "shifts in the locus of authority over policy" (Hall, 1993). Finally, the ideational framework itself will be changed.

Oliver & Pemberton (2004) emphasized that paradigm failure does not necessarily lead to its replacement. New ideas may be rejected, partially adopted or result in a full paradigm shift; their incorporation into the prevailing paradigm constitutes "paradigm evolution" rather than "paradigm revolution". Garzon (2006), drawing on Coleman *et al.* (1996), also stressed that cumulative adjustments can deliver paradigm change, and contends that this indeed has occurred with the CAP.

There is general agreement of stakeholders and analysts that the full paradigm shift towards multifunctionality has not occurred (Feindt, 2010), as evidenced by the numerous calls for reform (*e.g.* Pe'er *et al.*, 2019; IPES-Food, 2019; GFGF, 2019), as well as the results of various studies on the impacts of the CAP on the environment (*e.g.* Reif & Vermouzek, 2019; Alliance Environnement, 2019a,b); though there is merit in Garzon's (2006) claims that a replacement of the dependent paradigm is occurring, we find it highly contentious to declare it completed. The Commission's reform proposal as a visible product of learning allows us to assess the extent of its learning; SL of the entire policy community could only be indicated by actual policy change. In this paper, we attempt to assess both the extent of 'learning' (change in the hierarchy of goals) done by the Commission and that of the wider policy community.

Methodologically, studies of CAP reforms based on the SL approach have employed document analysis (Moyer & Josling, 2002; Garzon, 2006) and / or interviews with key actors (Feindt, 2010) to identify policy learning by examining which variables change: policy settings (first order), instruments (second order) or the ideational framework (third order or policy paradigm).

Liberal intergovernmentalism

Liberal intergovernmentalism (Moravcsik, 1991, 1993, 1998) may help to clarify why it is difficult to achieve paradigm shifts in the CAP. It claims that MSs have always guarded their national interests, trying to avoid granting supreme authority to central institutions that could weaken their sovereignty, preferring to work through intergovernmental institutions such as the Council of Ministers (Moravcsik, 1991). MSs accept only as much independence of EU bodies as is consistent with their interests; the CAP exists only to serve those interests. MSs as economically interdependent agents play a two-level game in which the domestic political process is the primary determinant of their policy preferences at the EU level; further, it is the relative bargaining power of MSs and incentives for institutionalisation that determine the outcomes of negotiations. We posit that the proposal reflects a policy environment unfavourable for continued fully supranational management due to excessively divergent national policy preferences and situations. As this includes the environmental field, the reduced supranationalism is likely to undermine environmental goals in most MSs and therefore also at the aggregate EU level.

Although intergovernmentalism studies are not based on a distinctly defined methodological framework, they all focus on the role of states and national governments in particular as primary actors in the integration process; their prevalent method of analysis is document analysis.

Path dependency

The CAP is highly resistant to change (Moyer & Josling, 2002; Greer, 2013; von Cramon-Taubadel, 2017); to explain this resistance, the concept of path dependency (PD) is useful (Kay, 2003). PD constrains future choice sets and links decision-making through time (North, 1990). Due to positive feedback loops, steps in a particular direction induce further movements in the same direction (Pierson, 2000). Departure from an existing policy path occurs only when the current one becomes manifestly untenable (Moyer & Josling, 2002). The concept of divergence from a given policy path can be linked to paradigm change, or third-order policy change *sensu* Hall (1993).

Kay (2003) listed three types of feedback mechanism pertinent to the CAP: 1) its effect on interest groups, 2) its influence on state capacities (administrative resources) and 3) consequences at the individual (beneficiary) level in terms of sunk costs. According to him, pre-1992 CAP changes were moderate and in response to runaway budgetary costs, while the MacSharry reforms of 1992 were the result of shocks to the existing policy

path. He concluded that policy may change significantly over time without a “big bang” event. He (Kay, 2005) also pointed out, referring to Hall (1993), that under the three-level categorization of policy change, policy change and policy stability may be observed simultaneously.

Henke *et al.* (2017) introduced the concept of “national path dependency”, combining EU path dependency and adaptation of the CAP to conditions at the national level. The 2013 CAP reform introduced a new system of direct payments that gave MSs the freedom to modulate certain elements, adapting it for the first time to their respective policy needs. The reform was regarded by Bache *et al.* (2014) as ‘further contributing to the fragmentation and re-nationalization of the CAP’; they consider this shift as indicative of the relevance of intergovernmental theories of the EU. The current reform proposal, by applying national strategic planning to the entire CAP, may represent a further step along the line of national path dependency. We posit that, due to strong vested interests, the policy as a whole will be unable to overcome its inertia and will continue along the dependent paradigm.

PD is difficult to operationalize empirically (Kay, 2005) – it provides neither a general list of variables for diagnostic and prescriptive inquiry nor hypotheses about specific links between variables (Ostrom, 1999). Studies on PD have predominantly performed document analysis of CAP reforms (Moyer & Josling, 2002; Kay, 2003; Henke *et al.*, 2017).

Methodology implementation

The research employed a qualitative method of policy analysis based on a combination of three theoretical approaches to evaluate the CAP reform. To comprehensively address the problem, we employed a combination of extensive document analysis and in-depth interviews.

Different sources of data reflecting the variety of views of the interest groups that influence policy development were used to gain a more complete insight into the problem. We analysed secondary data – statements of representatives of think tanks, researchers and key interest groups published in specialized publications, blogs, press releases and on webpages – and original data based on semi-structured interviews conducted by e-mail. The data were derived from a variety of sources:

1. Press releases and policy statements published on interest organisations’ webpages and official pages of the EU’s institutions. Where these were not directly available, we referred to Agra-Facts and Agra-Focus, comprehensive newsletters addressing the CAP and reporting on statements of the EC,

MEPs, MSs and interest groups (October 2017 – May 2020). These sources were used to gauge the prevalent hierarchy of goals in the policy community and potential crucial differences between the preferences of MSs.

2. A review of expert publications and blog posts by researchers and policy analysts dealing in the CAP published since the publication of the Communication (EC, 2017) introducing the reform (capreform.eu, arc2020.eu, the Institute for European Environmental Policy (IEEP), Farm Europe, as well as analyses conducted by the ECA), to estimate the quality of the proposal in terms of the ability of the institutional framework to support a significantly better environmental performance.
3. Interviews with members of the policy expert community, such as members of the Special Committee on Agriculture (2), key interest organisations (2 – COPA-COGECA¹ and CEJA²) and environmental organisations (2 – BirdLife and EEB³), and 4 representatives of the research community dealing with the CAP. These interviews were used to supplement the above two sources and further the understanding of both the prevalent opinion in the policy community and the institutional framework.

In the analysis, we followed the process of thematic analysis, which is the most common qualitative method used to find common patterns across a data set (Rubin & Rubin, 2005), based on documents or texts of interviews. Primarily, key themes or patterns of meaning regarding environmental policy change that come up repeatedly were defined, named and categorised into three main concepts according to different policy models. To assess the degree of change proposed by the Commission according to the social learning and path dependency models, we firstly identified which elements of the proposal indicate a change (or lack of change) in the hierarchy of policy priorities, and the quality of the proposed framework in terms of its ability to substantially contribute towards achieving environmental goals. We also examined reactions of think-tanks, investigating whether they see the proposed institutional framework as supporting a paradigm shift towards a radically greener CAP, and representatives of key interest groups, to find out whether the policy community itself supports this shift.

In the framework of intergovernmentalism, the thematic focus was based on the shift of responsibility from EU

to MS level, which was put in context by examining the Commission's substantiation of the shift and comparing it with explicit national preferences as expressed by national representatives in the Council of Agricultural ministers. In the next steps, we examined how the identified themes were patterned and supported the three theoretical models. Finally, we formed coherent narratives that included quotes from the analysed texts. All authors conducted coding manually and independently, with regular discussions of the coding process to limit possible inconsistencies.

Results

While the Commission cites (EC, 2018c) major changes taking place since the 2013 reform (*i.e.* higher market uncertainty, a shift from multilateral to bilateral and regional trade negotiations and new EU international commitments on climate change and sustainable development goals), none of these seems a shock capable of significantly changing the policy's overall trajectory. The last element comes the closest, as it is related to what does seem to be a big shock, *i.e.* budgetary cuts related to the UK's exit from the bloc and new concerns weighing on the EU budget. Another potential 'shock' could be an increased interest of society in the sustainability of food production and, by extension, the CAP, as reflected in the results of the public consultation (Ecorys, 2017).

Despite these disturbances, the hierarchy of the policy's challenges or goals remains fundamentally the same as in the previous period (1. Economic; 2. Environmental and climate; 3. Socio-economic). Economic goals (farmers' incomes) retain primacy – before environmental and social goals and other, new, objectives; this is reflected in the ordering of objectives in the proposal, but even more so in the proportion of funds allocated to Pillar 1, which is primarily dedicated to income support. However, the inclusion of the flexible eco-scheme in Pillar 1 does allow for substantial tweaking based on MS preferences, though the Commission is explicit in the assertion that the CAP's main objectives will be defined at the Union level.

Looking at the proposal more closely, there are important provisions that could potentially support a shift towards an environmentally more effective policy: i) the principle of no backsliding regarding environmental and climate objectives; ii) the need to take into account common EU objectives, three of which are environmental; iii) enhanced conditionality; iv) the system of sanctions and rewards conditioned upon performance; v) the requirement for MSs to use a 'sound intervention logic' and

¹ *Comité des organisations professionnelles agricoles-Comité général de la coopération agricole de l'Union européenne*, Committee of Professional Agricultural Organisations-General Confederation of Agricultural Cooperatives

² *Conseil Européen des Jeunes Agriculteurs*, European council of young farmers

³ The European Environmental Bureau

justify choices; vi) the possibility to amend Plans (and for the Commission to demand amendment and condition payments upon it); vii) the requirement of preparing a National Environmental and Climate Plan; viii) reservation of 30% of Pillar 2 funds to agri-environmental-climate measures; ix) the possibility of shifting funds to Pillar 2 without the obligation to co-finance measures. However, many of these provisions are wrought with issues, which we present below.

Accountability: monitoring and evaluation framework

The main critique in terms of quality expressed by environmentally oriented stakeholders as well as researchers is related to the lack of accountability due to the lack of quantified objectives at EU level (*e.g.*, BirdLife, 2018; Farm Europe, 2018; Pe'er *et al.*, 2019). Since no indicators or targets are explicitly defined at the EU level and there is no procedure envisaged enabling the Commission to define national targets (that would add up to a common EU target) in dialogue with MSs, this will be left to MSs, which will likely focus on the selection of measures and modalities of implementation, rather than defining needs and objectives (based on a sound **intervention logic**) in a measurable manner. Relying on defining needs based solely on SWOT analysis (a soft approach) may add to the danger of poor decision making; a quantitatively substantiated definition of needs might be better placed to ensure good governance; this opinion is shared both by interviewees and the ECA (2019).

IIEP researchers highlight that the three environmental objectives and their relating indicators are not directly linked to existing environmental legislation, which could ensure better integration (*cf.* Hart *et al.*, 2018). This raises concerns about the targets that MSs are likely to set, as well as their capacity to assess their progress and identify gaps. Similarly, it will be difficult for the Commission to assess MS performance and hold them accountable if objectives are not clearly articulated.

A further potential weakness of the proposal is the process of approval of Strategic Plans, the only mechanism in the Commission's hands that could ensure targeted and ambitious strategic planning. It will face time limits, limited data and a varying capacity of actors in different MSs. This will likely be compounded by political pressures to approve Plans in order to prevent 'delays in paying out direct aid to farmers' (a statement expressed by the majority of MSs (AT, BE, CY, EE, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, PL, PT, SI, SK) in Council and strongly indicative of the strength of the dependent paradigm; AgraFacts, 2018a; CoEU, 2018a). Moreover, background documents and analyses envisaged in the annexes to national Strategic Plans will be exempt from evaluation.

Some researchers warn that flexibility is often used by MSs to select the least ambitious approach (*cf.* Alliance Environnement & Thünen Institute, 2017), especially on environmental and climate targets. Numerous environmental and agri-environmental NGOs perceive the proposal as increasing subsidiarity without putting in place the necessary accountability mechanisms, which may result in a "race to the bottom" (Plateforme pour une autre PAC, 2018).

In "Last chance CAP" (EEB *et al.*, 2018), four environmental NGOs warn that the proposed **reporting obligations** are inadequate and question whether the new CAP can really be result-based, as it "merely incentivises weakly designed environmental commitments in order to maximize enrolment and be recognised by the EC as a 'good performer'." Farm Europe (2018) also warns that MSs will be tempted to reduce environmental requirements and ambitions in order to secure the additional 5% of the envelope for environmental performance and provide a cost advantage for their farms.

Institutional capacity of member states

Under new rules, the Commission's role will mainly be to validate Strategic Plans and monitor their implementation, and potentially to impose sanctions. This means that the main responsibility for planning and performance will be transferred to MSs, where the quality of the Plans will depend on that of the policy system in place. To make a shift towards a policy focused on results (including environmental), a shift towards evidence-based policymaking will be required, and this will in turn depend on the strategic orientation of decision-makers and the national implementing apparatus, the existence of good analytical support systems, as well as engagement of agricultural and other stakeholders. As stated by an interviewee, the capacity of actors in different MSs varies, so we can expect significant differentiation in the quality of implementation of the new model. Relevant discussions of agricultural ministers in Council reflect some of these considerations. For example, while most MSs in principle support the shift towards a results-based model, many have expressed misgivings regarding their ability to submit annual performance reports on time, and some have called for greater flexibility in the first years of implementation (CoEU, 2018b). In addition, the Commission itself will likely have to invest in enhancing its institutional capacities to support this undertaking.

Budgetary considerations

The proposed reductions (and concomitant increase in MS co-financing rates) in the Pillar 2 budget, which is

traditionally orientated towards addressing environmental and ‘other’ goals (EC, 2018c), seriously jeopardize environmental considerations, as the funds for agri-environmental schemes are not guaranteed. The lack of ring-fencing for eco-schemes (Pillar 1) has also been criticised by experts as the “single greatest weakness of the proposal” (Meredith & Hart, 2019), as the allocation of funds (in addition to the content of the schemes themselves) is left to the discretion of MSs.

Support for a shift in the policy community

The thinking of farm representatives still seems to be embedded within the dependent paradigm (*cf.* Burton & Wilson, 2006; McGuire *et al.*, 2013; van Dijk *et al.*, 2016): food production and income support are primary concerns, free trade is a threat and environmental obligations are a constraint. They have consistently criticized budget cuts, stating that achieving common objectives requires a common policy with a strong budget; they invoke i.a. high environmental ambition, preserving rural areas, production of quality food, and trade pressures as elements justifying the level of funding (COPA-COGECA, 2018). According to COPA-COGECA, farmers cannot accept further cuts to the budget (COPA-COGECA, 2020).

In Parliament’s Committee on Agriculture and Rural development (COMAGRI), the then-rapporteur MEP Esther Herranz-García, was also adamant about keeping the level of financing, as the main goal must be to support life in rural areas (CoEU, 2018c). The new COMAGRI chair Norbert Lins has also stated that cuts to the farm budget should be avoided (Euractiv, 2020). In Council, Ireland’s Agriculture minister called for an increased EU budget (Independent, 2019), saying that “Farmers will not thank us for that, as we are asking them to do more in terms of the environment and climate change and paying them less”. Similarly, the Hungarian minister stated that “we cannot ask farmers to do more for less money” (CoEU, 2019a).

A number of MSs (AT, BE, CY, CZ, EE, FR, IT, LT, LU, LV, PL, PT, RO, SI, SK) have echoed this concern on different occasions (*e.g.* CoEU, 2019b), stating that a higher level of environmental ambition must be backed by adequate financial resources. The new Commissioner Janusz Wojciechowski has also expressed the need for “a stronger budget” and appropriate support within the context of the new Commission’s new focus on sustainability (CoEU, 2019a). The unveiling of the European Green Deal and announcement of the Farm to fork strategy seem to have further reinforced these calls by MSs (*e.g.* CoEU, 2020).

Conversely, environmentalists, researchers and the public opinion are demanding “public goods for public

money” in accordance with the multifunctional paradigm. For example, BirdLife Europe has called for at least €15 billion per year for effective biodiversity measures and the elimination of “perverse subsidies”, particularly for factory farming and intensive agriculture (BirdLife, 2018). In its assessment of the proposals, the ECA (2019) states: “While the case for EU environmental and climate-change-related actions is strong, the data and the arguments used to support the needs assessment for farmers’ income are insufficient.” There is also a strong push in Council (CoEU, 2019c) by a number of MSs (BG, CY, CZ, EE, EL, FI, HR, HU, LT, LV, MT, PL, PT, SI, SK) to retain the Pillar 2 budget; they have called the cut disproportionate, especially in light of increased environmental ambition, though this may be an attempt to retain funding more than it is to strengthen environmental ambition.

National policy preferences

The Commission itself states in its impact assessment that changes are being instituted to accommodate the ‘wide diversity of farming conditions across the EU’ (EC, 2018c), but a look at national preferences reveals that there is a high diversity of opinions, including on environmental ambition, which may be irreconcilable at this time.

These are reflected for example in:

- Diametrically opposing opinions on Voluntary coupled support (a market-distorting measure generally recognised as detrimental to the environment, as it stimulates higher livestock density and input usage), with DE, DK, NL, and SE strongly opposed to it, BE, IT, FI, LV, MT and SI seeing it as essential to maintain production in rural areas, and some countries even suggesting an increase compared to the proposed percentage in a non-paper (tabled by BG, CZ, HR, HU, LV, SK and SI, backed by FI, FR, IT, MT and PL; Agra-Facts, 2019a; CoEU, 2019d).
- A variety of responses (CoEU, 2018d; Agra-facts, 2018b) regarding the environmental ambition of the proposal, with NL and SE *e.g.* praising the move towards result-based schemes and others (*e.g.* HU, IE) focussing more on the issue of funding it, claiming that it is not possible to ask for higher environmental ambition while reducing funding.
- Differences regarding the exemption of smallholders from conditionality requirements, with some (LV, PL, CY, EL, HR, HU, BG, IT, MT and LT) wishing to give them preferential treatment, and others (NL, FR, CZ, BE, DK, LU and SK) saying that all farmers should be treated equally (CoEU, 2019e; Agra-Facts, 2019b).

Conversely, there have been no objections to the intention to retain direct payments, a measure introduced almost two decades ago as a temporary compensatory instrument. This lack of opposition seems indicative of an overall entrenchment of the policy community in the dependent paradigm.

Discussion

This paper has examined whether the proposal for a new CAP could open the door to a fundamentally greener policy; to do this, we argue that social learning of the third level (Hall, 1993) is required to counteract the policy's path dependency (Kay, 2003). Moreover, we argue that the shift of powers from the EU to the MS level can be explained using insights from liberal intergovernmentalism (Moravcsik, 1991, 1993, 1998).

Potential for paradigmatic change

In terms of assessing SL and the order of policy change in the reform, our analysis has shown that the proposal does hold potential for a substantial overall greening of the policy. The conditions for a paradigmatic shift (Moyer & Josling, 2002) seem present: there is broad dissatisfaction with existing policies and instruments, there are shifts in the external environment (various reports on the environmental impacts of agriculture), and there seems to be broader ideological and political climate change, if mass demonstrations and the last EU parliamentary elections (in May 2019) are any indicator. In terms of a "shift of locus of authority" (Hall, 1993), the new competencies given to the Committee on Environment, Public Health and Food Safety (COMENVI) (Euractiv, 2018) and the attention given to societal considerations in the EC (2017) Communication and in the proposal itself, indicate that there is a contest of authority present. Moreover, the new Commission seems at least in principle to be giving climate change and environmental considerations more weight. These are all elements indicating a change in the policy direction. However, the end result will be strongly dependent on the final legislation and especially implementation at the MS level, since Strategic Plans are not accurately defined and have many weaknesses that limit policy change in terms of increased environmental ambition at the Union level.

While neither the content of the proposal nor the statements of members of the policy community can be taken as prioritising environmental considerations over farmers' incomes, the attention bestowed upon them may indicate a different development – the kind that Kay (2003) calls attention to. Namely, it is now clear that environmental

elements have become an indispensable part of the CAP, not through revolution, but through evolution. Even farm representatives cite environmental ambition as a justification for receiving funding, rather than rejecting it. This can be taken as an indication that environmental elements have themselves become a path dependent element of the policy.

Still, the changes proposed by the EC have been met with considerable reservation by key stakeholders, the EP and most MSs. Since conservative decision-makers and agricultural interest groups still hold great sway over the decision-making process (de la Rosa, 2010; Greenpeace, 2018), path dependency is likely to be strengthened along the dependent paradigm, limiting a shift towards the multifunctional one. As we have seen, numerous actors still adhere to the productivist, exceptionalist ideology that sets agriculture apart from other economic sectors (Burton & Wilson, 2006; van Dijk *et al.*, 2016). Firstly, they see strategic planning not as a step towards better policymaking, but as a hazard leading to extensive changes with insufficient funding. Secondly, they perceive increased environmental ambition as a threat and emphasize the impossibility of achieving it without increasing funding. They continue to push the policy along the dependent paradigm rather than making a shift to the multifunctional policy demanded by environmentalists and other stakeholders.

In our view, the divergence of national policy preferences is reflected in the fact that the Commission, while retaining a strong common element in the part of the policy that is less contested and on which a large number of MSs depend (*i.e.* income support), has introduced a high level of flexibility to accommodate for different levels of environmental ambition, in essence proposing an EU of two (or more) speeds. By rejecting the "one-size-fits-all" approach (*e.g.* Agra-Facts, 2019c; CoEU, 2019f), the Commission is in fact conceding that a completely common policy is no longer feasible. This is in part due to differences between different parts of the EU in terms of perceptions of the role of agriculture (Wilson, 2001; Garzon, 2005; Eurobarometer, 2018) and environmental concerns, potentially related to the East-West divide (Wurzel *et al.*, 2019). In this setting, the pressure to devolve responsibility and power to MSs - the move away from supranationalism - may be explained by the concept of "new intergovernmentalism" (Bickerton *et al.*, 2015). Namely, due to their economic, social and cultural differences, MSs have different interests with regard to the CAP and environment, are resisting further supranationalism and demanding increased independence and responsibility (subsidiarity). In line with Henke *et al.* (2017), we see a continuation of "national path dependency"; we argue that this devolution reflects the pressure of MSs for their situations to be taken into consideration, coupled with a political climate of Euroscepticism. Any kind of concerted paradigmatic shift at the EU level seems highly unlikely

in such a setting: while tailoring to individual needs of MSs is sensible, continuation of this trend may eventually lead to 27 distinct agricultural policies, rendering any discussion on one CAP paradigm moot.

In addition to contributing to the relevant literature by presenting substantive findings regarding paradigmatic shifts in the CAP, our analysis supports the claim that a combination of theoretical frameworks is useful to explain CAP reform; our combination of the three models – social learning, path dependency and intergovernmentalism – has proven useful in elucidating the political-economic background of the proposal, as well as potential trajectories. Analysing policy changes at the beginning of the legislative procedure has also demonstrated its usefulness, as it has revealed the proposal's shortcomings and the importance of the quality of reform proposals; however, it is also the main limitation of our study.

Adding to the usual uncertainties surrounding the legislative process, this particular CAP reform has been further complicated by the institution of a new EP and Commission, the inability to reach agreement on the EU's Multiannual financial framework and especially the COVID-19 pandemic. The latter could constitute a true policy shock and set in motion a paradigm shift in a number of directions. It has put the CAP process on hold and invited new discussions regarding national and EU self-sufficiency (not just in agri-food), as well as intra-EU solidarity. It has upended EU policymaking and a weak response by the EU may result in even stronger Eurosceptic tendencies; in addition, farm lobbies are seizing the opportunity to side-track environmental concerns as nonessential in the current situation. The CAP may truly be at a crossroads: only in hindsight will it be possible to judge whether, in which MSs, and in which direction a paradigm shift has occurred.

Policy recommendations

The analysis allows us to elaborate some policy recommendations. We propose that accountability structures and mechanisms be improved in the legislative proposals to improve the CAP's environmental performance. Objectives require quantification at the EU level and associated legislation and objectives in other EU policies should be incorporated into quantitative definitions of objectives in the proposals. To support this approach, the analytical background in terms of quality, relevance and availability of data should be improved at both EU and national levels.

The role of the Commission in the approval process of the Strategic Plans should be strengthened in order to ensure the quality of the process. To improve the quality of the Plans themselves, MSs should formally obtain the

opinion of environmental authorities (and other stakeholders). Moreover, Strategic Plans, evaluations and results should be made available to EU stakeholders and the public to facilitate comparative engagement, peer pressure and mutual learning, hopefully turning the process into a kind of "race to the top".

Conclusions

Evaluation of the proposed 2018 CAP reform and analysis of the responses of key interest groups has shown that the proposal does hold potential for a substantial overall greening of the policy, but will be strongly dependent on the implementation at the MS level. The elements supporting a shift are incorporated into provisions regarding strategic planning and increased environmental ambition, but the institutional framework does not guarantee it; the newly introduced flexibility leaves the decision to MSs.

Due to strong elements of path dependency and new intergovernmentalism, a radical paradigm shift seems very unlikely. Decision-making is too strongly influenced by agricultural stakeholders who favour the *status quo* (PD), while strengthening the role of MSs (intergovernmentalism) is weakening the commonality of the policy that guarantees at least minimal environmental standards. The proposed safeguards are too weak and should be strengthened through more accountability during the formulation and implementation of Strategic Plans. Without this, the demands of the public for an environmentally stronger CAP will go unheeded. To achieve paradigmatic change, however, public demands are not enough in themselves; preparing a viable proposal able to engender meaningful change requires understanding the complex policy environment and the political and economic forces blocking change.

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