

# AREPO analysis on the "Proposal for the new EU Fund and the CAP for 2028-2034"

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**The Association of European Regions for Products of Origin**

The European network of regions and producer associations  
that deals with products of quality and origin

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***Attention!*** This document does not express an AREPO political position.  
It simply is a technical analysis realised by AREPO services.

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## Part 1 | Introduction and Regulatory Framework

On 17 July 2025, the European Commission presented the [proposal for a Regulation establishing the new European Fund for economic, social and territorial cohesion, agriculture and rural development, fisheries and maritime policy, prosperity and security for the period 2028–2034 \(COM\(2025\) 565 final\)](#).

Furthermore, [the Commission published at the same time the proposal for a Regulation of the European Parliament and of the Council establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034](#). This document establishes the horizontal rules for the implementation of the CAP 2028–2034, namely: management and control systems, financial reporting, policy monitoring and evaluation, risk management, and compliance with environmental and social conditionalities.

The following analysis aims to highlight the key features of these two proposals, with a particular focus on the elements concerning Geographical Indications (GIs).

**At this stage, these texts are only proposals** and will now be examined by the European Parliament and the Council, which act as co-legislators. The proposals will undergo discussions, possible amendments, and negotiations before any final adoption. **The provisions, financial allocations, and governance mechanisms described below may therefore still change** during the legislative process.

## Part 2 | The proposal for a new European Single Fund

The regulation proposal on the new European Single Fund aims to rationalise the EU's financial architecture by suggesting the integration of key investment instruments, such as Cohesion policy, the Common Agricultural Policy (CAP), and the Common Fisheries Policy, into **a single strategic and financial framework based on nationally pre-allocated envelopes**. If adopted, this would mark a significant shift from the traditional separation of funds (e.g. EAFRD, ERDF, EMFF), with the stated objective of strengthening the coherence, effectiveness, and responsiveness of the EU budget in the face of increasing economic, climatic, social, geopolitical, and demographic challenges.

According to the Commission's proposal, the new Fund would aim to promote cross-sectoral synergies and enhance territorial resilience, particularly in rural, coastal, and island areas, while supporting the green and digital transitions and ensuring food security.

The draft instrument is presented as being based on the following principles:

- ▶ **Administrative simplification**, reducing the number of programmes from around 540 to **27 National and Regional Partnership Plans (NRPs)** (one single programming document per Member State) **and a single Interreg Plan**;
- ▶ **Greater strategic coherence**, through an integrated programming process and a single rulebook;

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- ▶ **Operational flexibility**, allowing for the reallocation of resources in response to emerging priorities or unforeseen crises;
- ▶ **Results-oriented approach**, with funding linked to the achievement of predefined objectives rather than cost reimbursement;
- ▶ **Multilevel governance and partnership**, reinforcing the regional dimension and stakeholder participation.

The Commission proposes a budgetary envelope of **€ 865 billion at current prices**, and **€ 150 billion** in loans. It also envisages the creation of an **EU Facility**, a budgetary reserve to respond to emergencies, finance innovative transnational projects, and provide technical assistance.

The proposal also contains provisions on governance, reporting, monitoring, financial management, conditionality (including respect for the rule of law), and criteria for support to specific territories (outermost regions, Aegean islands, rural and coastal areas).

### Criticality: Risks of Integrating CAP into a Single Common Fund

From AREPO's perspective, the **proposed integration of CAP, Fisheries, and Cohesion policies into a single common fund** raises **significant concerns**. While the goal of **simplification and greater coherence** is understandable, this approach **risks diluting the specific objectives and governance structures** that have historically characterized each policy.

- **Common Agricultural Policy (CAP):** Agriculture and rural development follow **distinct cycles, legal frameworks, and stakeholder dynamics**. Within a broad, multi-sectoral fund, there is a **real risk that rural and agricultural priorities will lose visibility**, especially in Member States where **Cohesion policy dominates national investment agendas**.
- **Governance challenges for regions:** The **single rulebook and integrated Partnership Plans** could **weaken regional decision-making**. Regions currently managing rural development programs **may see their role diluted**, as agricultural interventions **would compete with larger national envelopes**, e.g. transport or infrastructure projects.
- **Risk to predictability of support:** Cross-sectoral **reallocation mechanisms**, while designed to provide flexibility, **could jeopardize the stability of agricultural support** and **undermine long-term investments** in rural areas and quality schemes.

This shift, if confirmed, could **erode the visibility and continuity of EU agricultural policy**, moving away from the **tailored, sector-specific approach** that has been central to the CAP.

## I. National and Regional Partnership Plans

Under Article 5 of the Commission's proposal, the National and Regional Partnership Plans (NRP Plans)<sup>1</sup> and the Interreg Plan would be implemented through **shared management between the European Commission and Member States**.

However, the proposed EU Facility, designed to support transnational projects or respond to emergencies, could be implemented via direct, shared or indirect management, depending on the nature

<sup>1</sup> Template available in the [Annexes](#), Annex V, p. 10

of the action. Contributions from the Global Europe Instrument related to outermost regions could also follow shared or indirect management models.

According to Article 6, **each Member State would be required to set up an inclusive and representative partnership to design and carry out its Plan**. This is intended to follow a **multi-level governance and bottom-up approach**, ensuring the participation of regional and local actors and other stakeholders, in order to better align investment priorities with territorial needs.

According to Articles 21–25, each Member State would submit to the European Commission its National and Regional Partnership Plan, prepared in cooperation with the relevant stakeholders mentioned above. The Plan would need to comply with specific content requirements laid out in Article 22 and Annex V, including objectives, funding allocation, and monitoring arrangements. Under Article 23 of the Commission proposal, the approval of National and Regional Partnership (NRP) Plans follows a two-step process.

1. **Commission assessment (up to 4 months):** The Commission examines the Plan and can issue observations or request modifications. The timeline is suspended until the Member State provides the requested information or an updated version.
2. **Submission to the Council:** If the Commission concludes that the Plan meets the requirements, it submits a **proposal for a Council implementing decision**.
  - **If certain measures still do not comply**, Article 23(5) allows the Commission to **flag the deficiencies directly in its proposal** and forward it to the Council.
3. **Council final decision:** The Council formally adopts the implementing decision, as a rule within four weeks. Only after that, the Commission adopts its financing decision.
  - **Measures with identified deficiencies will not receive payments** until the problems are remedied.

During implementation, Member States could **request justified amendments** to their Plans, explaining the expected impact on the achievement of objectives (Article 24). A **mandatory mid-term review** would be due by **31 March 2031**, allowing for adjustments based on new challenges or changing priorities (Article 25).

Concerning the governance of the plans, Member States would have **to designate at least one managing, paying, and audit authority**. If multiple managing authorities exist, a coordinating body would be required. Monitoring committees would need to be established, and where several exist, a coordinating committee would oversee implementation. The roles and functions of these bodies are outlined in the proposal.

Furthermore, article 57 defines the role and purpose of EU and national CAP Networks as support and knowledge-sharing platforms aimed at contributing to the design and implementation of the CAP interventions of the NRP Plan.

The regulation proposal foresees compliance with financial rules, legal obligations, and data transparency, including the use of the Integrated Administration and Control System (IACS). Financial instruments (existing or new) could be included in NRP Plans under specific management and audit conditions. Support is also encouraged for local cooperation, integrated territorial development, and community-led local development (CLLD) and LEADER.

Continuity from 2021–2027 would be ensured under Article 79, subject to specific conditions.

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**Criticality: Weakening of Regional and Commission Roles**

- **Optional regional annexes:** The regulation maintains a single **national plan** with only **voluntary regional annexes**, leaving regions without a **direct communication channel with the European Commission**. Their role is limited to **negotiations with the national government**.
- **Shift of power to the Member States:** NRP Plans are **approved through a Council implementing decision**, which **reduces the Commission's gatekeeping role**.
- **Risk for the common EU agricultural policy:** This setup increases reliance on **intergovernmental negotiation** and may **weaken the EU-wide coherence of CAP**, potentially affecting **rural development and quality schemes**.

**Part 3 | The Common Agricultural Policy (CAP) within the proposal for the new Fund**

[The Commission Proposal for a Regulation of the European Parliament and of the Council establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034](#) establishes the horizontal rules for the implementation of the CAP 2028–2034, namely: management and control systems, financial reporting, policy monitoring and evaluation, risk management, and compliance with environmental and social conditionalities. This proposal accompanies the new financial architecture set out in [Regulation COM\(2025\) 565](#) and reflects the priorities outlined by the Commission in the communication "[A Vision for Agriculture and Food](#)" (February 2025).



This means that **the CAP would be fully integrated into the new Fund, and its programming and delivery would take place through the National and Regional Partnership Fund and plans**, moving beyond the current two-pillar structure based on the EAGF (direct payments) and the EAFRD (rural development).

As a matter of fact, the proposed framework aims to simplify procedures and facilitate the integration of different instruments under a unified structure. There is a stronger focus on **performance-based payments**, more **flexibility** in the use of financial instruments, and closer integration between what were previously two separate pillars of the CAP: Pillar I (direct payments) and Pillar II (rural development).

The proposed CAP framework aims to strike a balance between fair farmer income, affordable and safe food for consumers, and environmental protection.

It would retain its traditional role of income support and market stabilization, but with a renewed emphasis on:

- ▶ environmental and climate sustainability;
- ▶ competitiveness and resilience of the agricultural sector;
- ▶ generational renewal and vitality of rural areas;

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## I. The supply of safe, high-quality, and accessible agricultural products. Type of interventions for the Common Agricultural Policy

The proposal for the Single Fund outlines a **broad set of CAP interventions** that merge income support, sectoral measures, and rural development under one integrated framework.

Interventions include **area-based income support** (with degressive payments), **coupled income support** for specific sectors, **crop-specific payments for cotton**, and **payments for natural constraints or mandatory environmental requirements**.

Beyond income support, the Fund would finance **agri-environmental and climate actions**, **risk management tools**, **investments for farmers and forest holders**, **support for young and small farmers**, **farm relief services**, and **knowledge and innovation initiatives**.

It also incorporates **territorial and local cooperation actions**, **LEADER**, the **EU school scheme**, and **sectoral interventions under the CMO**, including support for producer organisations.

This integrated approach reflects the post-2027 CAP's shift towards a **single, flexible intervention menu**, combining the former direct payments, rural development, and sectoral tools into a unified programming and funding structure.

## II. Ring-fenced budget for the CAP

The proposed CAP after 2027 would have a **ring-fenced budget of at least €300 billion (current prices)** reserved for **income support and crisis support**, with the intention of maintaining the stability of **direct payments and basic farmer support**. In detail, this **ring-fenced envelope** would cover:

- **Income support**, including degressive area-based payments and coupled support;
- **Environmental and climate actions**, such as agri-environmental commitments and payments for natural constraints or mandatory environmental requirements;
- **Farm-level support**, including investments for modernisation, diversification, and the setting-up of young or small farmers;
- **Sectoral interventions under the CMO** (e.g. for recognised producer organisations).

These interventions (points **a–k and r** of Article 35) represent the **stable CAP core**, ensuring continuity of direct payments and basic farmer support.

All **other CAP tools**, such as **LEADER**, **territorial and local cooperation initiatives**, **knowledge and innovation (EIP-AGRI)**, the **EU school scheme**, and measures for **outermost and smaller Aegean islands**, would be financed **outside the ring-fenced CAP envelope** through the **broader National and Regional Partnership Plans (NRP Plans)**, which cover **€865 billion** across multiple EU policies. A new **European Competitiveness Fund** is also proposed to complement these instruments, focusing on **research and innovation in the agricultural sector**. In addition, the **Unity Safety Net**, a reviewed crisis reserve, would allocate **€6.3 billion over 7 years**, doubling the size of the current crisis reserve to help address market shocks and disruptions.

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## CAP Interventions Post-2027 (Article 35) – Ring-fenced vs. Non-Ring-fenced

Category / Intervention	Ring-fenced (core €300 bn CAP)	Non-ring-fenced (NRP Plans / other)
<b>Income Support</b>		
a) Degressive area-based income support	✓	
b) Coupled income support	✓	
c) Crop-specific payment for cotton	✓	
d) Payment for natural and other area-specific constraints	✓	
e) Payment for mandatory environmental requirements	✓	
<b>Farm &amp; Rural Development Support</b>		
f) Agri-environmental and climate actions	✓	
g) Support for small farmers	✓	
h) Support for risk management tools (insurance, mutual funds)	✓	
i) Investments for farmers and forest holders	✓	
j) Setting-up of young farmers, new farmers, rural start-ups and small farmers	✓	
k) Farm relief services	✓	
<b>Territorial &amp; Local Cooperation</b>		
l) LEADER / community-led local development		✓
n) Territorial and local cooperation initiatives		✓
<b>Knowledge &amp; Innovation</b>		
m) Knowledge sharing and innovation in agriculture, forestry and rural areas		✓
<b>Sectoral &amp; Market Measures (CMO &amp; specific regions)</b>		
r) Interventions in certain sectors under the CMO (producer organisations, etc.)	✓	
q) EU school scheme		✓
o) Interventions in outermost regions (Reg. 228/2013)		✓
p) Interventions in smaller Aegean islands (Reg. 229/2013)		✓

### III. National CAP Strategic Plans

The new CAP **would continue the approach based on national CAP Strategic Plans**, as for the 2023-2027 CAP, designed by Member States. **However, under the proposal, their approval would**

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**follow the new procedure described above**, where the **Council adopts the final implementing decision** on the National and Regional Partnership Plans, based on a **Commission proposal**.

These plans would remain the CAP core programming tools, consisting of targeted interventions tailored to national and regional contexts, while aligned with shared EU objectives, thus allowing **Member States more flexibility**.

Member States would remain responsible for the management of CAP funds. **The implementation of the CAP would take place through National and Regional Partnership Plans**, in line with the principles of subsidiarity and multi-level governance. This means that NRP plans, under the overall framework of the proposed Single Fund, would provide the **delivery mechanism** for many territorial and rural investments, including some funded under the CAP.

Each Member State would have to designate:

- ▶ one or more managing and paying authorities;
- ▶ monitoring committees for each chapter of the Plan;
- ▶ a national CAP network, aimed at strengthening cooperation and the exchange of best practices to help designing and implementing the CAP interventions of the NRP Plan (Articles 49–57).

Access to CAP payments would remain conditional on **compliance with minimum environmental and social requirements**, designed by Member States but within a common EU framework. Member States would be required to establish a "farm stewardship" system ensuring compliance with the "do no significant harm" principle. This includes minimum environmental requirements (e.g., soil and water protection), and respect for labour standards and occupational safety, with flexibility to adapt these to national contexts. While farmers would have to meet baseline conditions, no additional enforcement burdens would be placed on national administrations or social partners.

The text also proposes a **shift from a requirements-based approach to an incentive-based approach**. Member States would be expected to target support towards the priorities of the CAP, in particular long-term sustainability and the contribution to climate neutrality by 2050. For this, they would have the possibility to **better reward farmers who go beyond the minimum requirements** by providing them with financial support for the ecological transition and sustainable resource management.

A dedicated focus on **generational renewal** is included in the proposal. Member States would be required to include a national strategy within their Partnership Plans, based on context-specific needs. This must be accompanied by a tailored "starter pack" for young farmers, combining investment support, advice, and measures that ease access to land and services, aiming to ensure the long-term viability and attractiveness of the EU farming sector.

The proposal also foresees financial support in response to crises such as natural disasters or epidemics. Member States could also allocate resources to insurance schemes and mutual funds to improve farm resilience.

Strategic Plans would have to include key performance indicators and mechanisms for annual reporting. The evaluation framework is proposed to put emphasis on transparency, environmental impact assessment, and the active involvement of regional authorities and stakeholders. Moreover, the regulation would allow for the **combination of grants and financial instruments**, including blended finance, to optimise the use and targeting of CAP resources.

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### Criticality 1: Decrease in EU Agricultural Funding

- Under the proposal, **around €300 billion is ring-fenced exclusively for income support and crisis management**, including the **Unity Safety Net**.
- By comparison, the **current 2021–2027 CAP budget is approximately €386 billion**, meaning a **nominal decrease and an even sharper reduction in real terms when adjusted for inflation**.
- This **shrinks the overall capacity of the CAP** to respond to long-term challenges and support farm incomes at EU level.

### Criticality 2: Risk for Rural Development and LEADER Funding

- **Rural development, LEADER, and smaller CAP schemes** are not ring-fenced and would be **financed through the broader Single Fund**, alongside cohesion and fisheries policies.
- **This leave rural development to compete for resources** with wider regional and social investments.
- The shift **risks reducing the predictability and visibility** of EU support for **territorial development, quality schemes, and community-led initiatives** in rural areas.

## Part 4 | The place of Geographical Indications in the proposals

The proposals for the post-2027 CAP and the new Single Fund confirm that **Geographical Indications and other Union quality schemes will remain eligible for support within the CAP framework for 2028–2034**, ensuring continuity with the current programming period.

**Recital 14 of the CAP regulation proposal** specifies that Member States will continue to be able to support quality schemes, promotion activities, and initiatives aimed at developing short supply chains and local markets.

In parallel, **Article 5 of the CAP regulation proposal and the article 35 of the Single Fund proposal** includes these initiatives among the eligible types of intervention, confirming that GIs and quality schemes remain integrated in the future CAP architecture through the National and Regional Partnership Plans.

### Criticality: Limited ambition for GI support

- The proposals **maintain the status quo** rather than **introducing new or reinforced tools** for the development and valorisation of GIs.
- There are **no dedicated interventions** aimed at enhancing the economic performance or visibility of GIs beyond existing measures.

### I. Technical and administrative assistance

Under **Article 12**, the proposed Regulation introduces the possibility for the EU to finance **technical and administrative assistance** for the implementation and management of the Fund.

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This type of support **is managed directly by the European Commission** and covers activities such as IT systems, monitoring, audits, communication, and the functioning of EU-wide networks.

**New in the proposal**, these actions can **explicitly include Union quality schemes**, notably the **development, registration and protection of the names, symbols and abbreviations** associated with PDO, PGI and TSG schemes, as well as contributions under international agreements.

**Positive point:** While such activities were **already financed in practice under the current CAP**, the proposal **strengthens the legal base** for using CAP funds for **EU-level management of GI and organic schemes**, providing greater legal clarity and continuity.

## II. Territorial and local cooperation initiatives

Article 74 proposes the expand the scope of specific type of support for **territorial and local cooperation initiatives**, including a dedicated provision for quality schemes under point (e). Specifically, it would allow Member States to fund cooperation activities that promote **Union or national quality schemes and their use by farmers**.

As outlined before, the regulation proposal for a Single Fund includes among the type of interventions “Territorial and local cooperation activities” that are described in the **article 74 of the proposal**.

This provision would include the possibility to provide support for “quality schemes recognised by the Union or by the Member States, and their use by farmers” (art. 74.1.e). Thus, the proposal would maintain the approach on geographical indication within the current **cooperation measure**, which already include the possibility to support **Union and national quality schemes** (Article 77 of Regulation 2021/2115).

The proposal **does not broaden the scope of this support**, but it presents it in a more streamlined form, **without the detailed specification** currently in force. Under the existing regulation, support is **explicitly limited to certification costs and promotion of participation in quality schemes**; in the new proposal, the wording is **more generic**, leaving to **Member States the responsibility to define the exact types of support** in their National and Regional Partnership Plans.

### Criticality: Lack of specificity in cooperation measures

- **Article 74** no longer details the **types of support** eligible for quality schemes (currently limited to **certification and promotion costs**).
- This **greater flexibility** may represent an opportunity to include more ambitious measures supporting GIs, but at the same time it may bring the risk of **uneven implementation** across Member States and **uncertainty** for GI producer groups.

The proposal for the post-2027 CAP (COM 2025/565) **maintains continuity** with the current CAP (Article 77 of Regulation 2021/2115) regarding support for **producer groups (PGs), producer organisations (POs), and interbranch organisations (IBOs)**.

Under the proposal, Member States may continue to **support the setting-up of PGs, POs, and IBOs** for a **limited start-up period**, with:

- Aid **capped at 10% of annual turnover** and **€100 000 per year**,
- **Degrressive payments** for a maximum of **five years**.

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Compared to the current Article 77, the **new Article 74 is less detailed**:

- The proposal **does not specify** the types of eligible costs (today limited to **certification and promotion** in quality schemes).
- **Member States** will have **greater discretion** to define the support in their **National and Regional Partnership Plans (NRP Plans)**.

As it is the case under the current CAP regulation, **GI producer groups** (as defined in Article 32 of Regulation 2024/1141) are **not automatically eligible** under Article 74. They can **only benefit** if they are **formally recognised** as a **CAP producer group or organisation** under national rules. Furthermore, since the measure is dedicated to the setting-up, a GI producer group could receive **CAP cooperation support** as a producer group only for its **initial organisation and marketing efforts**.

#### Criticalities for GIs under Article 74 (Producer Groups and Organisations)

##### 1. Unclear scope of eligible support

- The proposal **removes the detailed description** of eligible costs found in the current CAP (limited to **certification and promotion** for quality schemes).
- This creates **uncertainty** on which activities could be supported.

##### 2. High reliance on Member State discretion

- The level and type of support will depend entirely on **National and Regional Partnership Plans (NRP Plans)**.
- This increases the **risk of uneven support** for GIs across the EU.

##### 3. Limited accessibility for GI producer groups

- **GI producer groups** (Reg. 2024/1141) are **not automatically eligible** under Article 74.
- They can **only access support if**:
  1. They are **formally recognised** as **CAP producer groups or organisations** under national rules, and
  2. **Member States include this support** in their NRP Plans.

##### 4. Support restricted to the setting-up phase

- **Aid is limited to new producer groups**. This automatically excludes well-established GI producer groups, which cannot receive support under this measure.

### III. Support for sectoral interventions under the CMO framework

The proposal maintains the current framework for **sectoral interventions under the Common Market Organisation (CMO)**, covering sectors such as **fruit and vegetables, wine, olive oil, hops, and apiculture**. Recognised **producer organisations (POs), associations of POs, and interbranch organisations (IBOs)** will continue to implement **operational programmes**, which remain the primary delivery tool for these measures.

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Under the new Single Fund, sectoral interventions are **integrated into the same programming and financial framework** as income support and rural development, with a **ring-fenced component (Article 35, point r)** for certain core interventions and other sectoral measures financed outside the core CAP envelope through the **NRP Plans**. The proposal **clarifies support ceilings**—set as a percentage of marketed production (4.1%, 4.5%, 5%, plus 0.5% for environmental, innovation or generational renewal actions)—and **allows higher co-financing rates** for priority or crisis-related interventions. This approach **streamlines the management** of sectoral programmes while **maintaining continuity** for sectors closely linked to GIs, such as wine and olive oil.

## Part 5 | Conclusions

The post-2027 CAP and Single Fund proposals **maintain the current approach to Geographical Indications**, without introducing **new or reinforced measures** that address the **specific needs of GI systems**.

While support remains possible through **EU-level technical assistance, national cooperation measures** and **sectoral interventions under the CMO**, the overall framework presents **significant criticalities**:

- **Continuity without improvement:** Well-established GI groups remain **excluded from direct support**, and no new tools are foreseen to **valorise or develop GIs**.
- **Lack of clarity and simplification:** The removal of detailed rules on eligible costs increases **uncertainty for producers**, while **administrative burdens remain unchanged**.
- **High reliance on Member States:** The definition and implementation of support measures is left to **National and Regional Partnership Plans**, creating a **risk of fragmented and uneven support across the EU**.
- **Challenges of the new Single Fund framework:** By integrating CAP into a **multi-sectoral funding architecture**, agricultural and GI priorities may **lose visibility and predictability**, competing with broader cohesion and social policy objectives.

In essence, the proposals **preserve the status quo in a more complex framework**, missing the opportunity to **strengthen GI support and reduce administrative constraints**.

## Part 6 | Useful links

- ▶ [European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security](#)
- ▶ [The next chapter for the CAP](#)
- ▶ [The Proposal for a Regulation of the European Parliament and of the Council establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034](#)

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