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Keynote article

The Common Agricultural Policy in the National and Regional Partnership Plan: challenges and key issues of the Commission's proposals

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Abstract

This paper examines the European Commission's proposed 2028-2034 Multiannual Financial Framework and its implications for the Common Agricultural Policy (CAP), focusing on the National and Regional Partnership Plans (NRPPs). By integrating the CAP, Cohesion policy and other programmes within a Single Fund, the reform seeks to strengthen policy coordination, territorial impact, administrative simplification and performance-based delivery. The analysis highlights, however, substantial governance, financial and institutional challenges. Effective integration will depend on Member States' capacity to build coherent strategies, ensure meaningful regional and stakeholder participation, and manage competition for non-ring-fenced resources. The proposed architecture may weaken the CAP's distinct identity, reinforce a sectoral approach to agriculture and reduce funding predictability, particularly for rural and territorial interventions. The NRPPs mirror the national Recovery and Resilience Plans model, raising concerns about administrative complexity, the suitability of milestones and targets, and the measurement of long-term impacts and European added value. The actual shape the NRPPs will take ultimately depends on governance choices, resource allocation and the outcome of ongoing negotiations.

Keywords: Single Fund, performance-based budgeting, rural development, multi-level governance, Cohesion policy.

JEL codes: Q18, R11, H61, H77, R58.

Highlights:

- NRPPs integrate CAP and Cohesion policy within a single programming framework, yet underlying policies and instruments remain distinct.
- Many rural development interventions compete with other policies for the non-ring-fenced resources while facing financial uncertainty; the reform appears to signal a return to a siloed, sectoral approach to agriculture.
- Effectiveness of NRPPs depends on strong multi-level governance and strategic vision.
- Ongoing negotiations make it difficult to foresee the actual shape the NRPPs will take.

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1. Introduction

The Multiannual Financial Framework (MFF) 2028-2034 period proposed by the European Commission in July 2025 (European Commission, 2025a) opens a new chapter of the Common Agricultural Policy (CAP). Rooted in the objectives set out in the Treaty of Rome, the Common Agricultural Policy has evolved considerably over more than six decades. Some changes have profoundly altered its functioning, introducing key principles such as support for rural development, the decoupling of support, environmental and, subsequently, social conditionality, the targeting of income support, the focus on climate and nature-friendly farming practices, and the flexibility granted to Member States (Henke *et al.*, 2018; Cagliero *et al.*, 2023). Others have merely recalibrated existing instruments, mainly direct payments, to adapt them to the changing reference context.

The primary drivers of change are largely exogenous to the sector: international agreements on the liberalisation of agricultural trade, growing attention to the environmental impact of agriculture, budgetary concerns about the volume of financial resources available under the EU budget and the CAP, as well as the divide between net contributor and net beneficiary countries (Swinnen, 2015; Haas and Rubio, 2017; Matthews, 2015; De Filippis *et al.*, 2013). Unsurprisingly, the latest CAP

reforms emerged in the context of EU budgetary programming and enlargements to new Member States.

The proposals for the 2028-2034 MFF follow the same logic, yet unfold against an unprecedented backdrop of severe economic, social, and geopolitical instability. Alongside the escalation of existing conflicts, notably the Russia-Ukraine war, new battlefronts have emerged across the Middle East, accompanied by heightened economic and trade tensions between traditional transatlantic allies. The collapse of a rules-based trading order and the loss of geopolitical stability, coupled with soaring fossil fuel prices, have thrown the EU's vulnerability regarding critical raw materials into sharp relief (Draghi, 2024). Consequently, boosting Europe's economic competitiveness and scaling up defence spending have moved to the very core of the political agenda. In this sense, the need to reposition the Union in terms of internal security and to redirect competitiveness toward strategic drivers is particularly evident, as highlighted by the Letta (2024) and Draghi (2024) Reports. The proposals for the next MFF (European Commission, 2025a) therefore envisage a reconfiguration of the budget architecture and a reduction of the headings from seven to four; the creation of the new Competitiveness Fund; the consolidation of spending programmes (reducing them from 52 to 16) around common policy objectives to allow greater flexibility in deploying resources and funding emerging priorities; a stronger shift towards performance-based policies; and a new multi-level governance model.

Based on legislative texts, official documents from European institutions, grey literature and blogs, the aim of this work is to highlight the main changes and critical issues of the proposed reform, with particular reference to the integration of the CAP in the National and Regional Partnership Plans (NRPPs) (European Commission, 2025b), the programming instrument of the new policy architecture. This work will look at the architecture of the NRPPs and their implications in terms of governance; at the risks and opportunities of integrating agricultural and cohesion policies in the NRPPs; and, above all, at the emerging role of rural development, reorganised into interventions for farms and accompanying interventions for territorial development. Finally, we will examine the risks to the long-term sustainability of CAP financial resources. The research question is: are the proposed NRPPs effective instruments for promoting greater synergy between the CAP and Cohesion policies in favour of balanced territorial development?

2. Framing CAP reform

From a specifically agricultural standpoint, the document that preceded the MFF proposals package and foreshadowed policy directions for the CAP is the Communication "A Vision for Agriculture and Food" (European Commission, 2025c).

Setting out a vision for the European agri-food sector towards 2040, the Communication signalled several departures from the past: the CAP's declining centrality in agricultural initiatives; stronger synergies and complementarities between the CAP and Cohesion policy to deliver effective support and tangible impact in rural areas; the need to leverage investment and public-private partnerships to foster the sustainability transition; and the issue of dependency on imported inputs, alongside food production as an essential prerequisite for safeguarding EU strategic autonomy and food sovereignty.

The Commission's subsequent reform package translates these policy orientations into a general overhaul of the governance framework for resource programming and management (Matthews, 2026a): the abolition of the two budget funds specifically dedicated to direct payments and market interventions (the European Agricultural Guarantee Fund - EAGF) and to rural development support (European Agricultural Fund for Rural Development - EAFRD), and their integration into a Single Fund - implemented via NRPPs - alongside financial allocations from the European Fund for economic, social and territorial cohesion, Fisheries and maritime policy, Prosperity and security, and the Social Climate Fund.

The Plans bring together under a single integrated instrument the CAP and Cohesion policy, the two European policies that currently absorb around two-thirds of the EU budget, as well as the structural funds, social policy, maritime and fisheries policy, migration, and internal security.

The objective of the proposal is to foster synergies between policies by enhancing their territorial impact, avoid overlaps or programming gaps, and reduce administrative burdens as well as programming and implementation delays.

Under the proposed Single Fund, the CAP is expected to ensure the long-term viability of the agricultural and forestry sector, its competitiveness, resilience, and sustainability, as well as food security and the attractiveness and quality of life in rural areas. Once again, the CAP is tasked with a multiplicity of often conflicting goals, relying on a policy toolbox that has shown its limitations over time. And indeed, on the instruments front, no major overhauls are in sight. In the face of new global tensions and unresolved structural bottlenecks within the sector, the CAP remains firmly anchored on a sectoral vision of agriculture and on traditional interventions, mainly of the first pillar of the CAP, casting serious doubt on its capacity to address both legacy and emerging challenges. Furthermore, the inertia of these proposals falls short of the strategic ambitions set out by the Commission itself, effectively blunting their ultimate impact.

Change is entrusted to the new policy architecture, in which the Partnership Plan represents one of the main innovations in terms of governance, implementation, multi-level institutional responsibilities, and financial management (Matthews, 2026a).

Under the reorganisation proposed by the Commission, the provisions governing CAP interventions are incorporated into the regulation on the NRPPs. The proposal identifies two groups of interventions. The first, defined as income support, is ring-fenced with a minimum pre-allocated financial envelope for each Member State. This group comprises direct payments and rural development measures whose final beneficiaries are farmers. All other CAP interventions, essentially those aimed at supporting rural areas through diversification strategies or local development, where farmers are not the direct beneficiaries, are funded from the non-ring-fenced share of the Fund, which can also be drawn upon by other structural policies (Tab. 1).

Table 1. The proposed CAP 2028-2034 Interventions

Income Support Interventions (ring-fenced)	Other CAP Interventions
Degressive area-based income support*	EU School Scheme*
Coupled income support*	LEADER*
Specific payment for cotton*	Support for knowledge sharing and innovation in agriculture, forestry and rural areas (AKIS)*
Small farmers payment*	Territorial and Local Cooperation initiatives
Payment for natural constraints and other area-specific constraints*	POSEI-SAI (Outermost Regions Programme)*
Support for disadvantages resulting from certain mandatory requirements	
Agri-environmental and climate actions*	
Support for small farmers	
Support for risk management tools*	
Support for investments benefiting farmers and foresters*	
Support for setting-up of young farmers, new farmers, rural businesses and start-ups and development of small farms	
Support for farm replacement services	
Sector-specific interventions*	

Note: (a) The asterisk (*) indicates mandatory interventions for Member States. (b) It does not consider the amendments proposed by the Council.

Source: European Commission (2025b).

Without delving into the specific provisions of the CAP interventions, which have already been partially amended by the Council's partial general approach on the NRPPs (Council of the European Union, 2026a), an examination of the proposals reveals a highly complex operational design: some measures are optional within the ring-fenced envelope, while others are mandatory within the unallocated envelope. Consequently, in exercising their discretion, Member States will have to decide not only whether to activate certain optional interventions, but also how to allocate funds for mandatory ones. This involves a bargaining process that, for ring-fenced interventions, takes place strictly within the purview of the agricultural authority, whereas for unallocated interventions, it engages the authorities responsible for other policy areas.

3. Key changes and critical issues

3.1. Architecture and Governance of the NRPP

This is not the first time that policy coherence and integration have been entrusted to unified programming tools. This had already occurred with the Regional Operational Programmes of the 2000-2006 programming period and with the Partnership Agreement for the 2014-2020 period. In those cases, rural development policy and Cohesion policy shared common objectives and strategies;

however, the governance and the management of interventions were anchored in the rules of the individual policies. In contrast, the 2023-2027 programming period marked, for the first time, the consolidation of the two agricultural funds into a single CAP framework under the national CAP Strategic Plan (CSP).

With the Single Fund, the management rules for the plan's policies are largely harmonised following the programming model tested with the national Recovery and Resilience Plans (RRPs).

In the Partnership Plan, the governance of the programme becomes central. It must integrate different public administrations and possess the capacity to identify a partnership that truly reflects all facets of the programme, pinpoint key intervention needs, build integrated and shared strategies around them, provide the flexibility suited to the specific requirements of individual policies, and establish a management system that ensures smooth operation. As highlighted by numerous scholars, the main risk lies in policy fragmentation and administrative complexity (Mendez *et al.*, 2026; Matthews, 2026b).

The structure of the Plan provides for a common general framework for all Member States. Specifically, it is required to: describe how the Plan contributes to achieving the general and related specific objectives set out in the proposed regulation; include reforms and investments linked to milestones and targets; comply with horizontal enabling conditions such as the Charter of Fundamental Rights, the Rule of Law, gender equality, and environmental principles; and ensure minimum financial allocation thresholds for social, environmental, and territorial objectives.

Against this backdrop, two key horizontal principles are introduced, with which all programmes must comply. The first concerns the obligation to demonstrate that the proposed interventions do not cause significant harm to the environment (the “Do No Significant Harm” or DNSH principle). This is an entirely new requirement for the agricultural sector, which raises questions about the administrative burden and the complexity of implementation for agricultural investments.

The second criterion introduced concerns gender budgeting, a financial programming tool aimed at assessing the impact of spending on gender equality throughout the implementation of the Plan based on specific indicators.

In this first part, the programme’s governance arrangements must also be defined by selecting among three options: a centralised model with a single Managing Authority concentrating the main operational and strategic functions; a second model based on balanced multi-level governance, characterised by a more equitable distribution of responsibilities. This model provides for a National Coordinating Authority overseeing the Plan as a whole, while management functions are distributed among several Managing Authorities, generally located within the ministries responsible for the respective policy areas. The third model is the most decentralised, with governance organised at the territorial level. While retaining a single National Coordinating Authority, management is divided between national Managing Authorities, responsible for centralised chapters, and regional Managing Authorities, responsible for territorial chapters.

The second part of the Plan will be structured into chapters. According to the Commission's proposal, a chapter outlines how a specific sectoral and/or territorial need is to be addressed. It represents the space where programming is organised, management responsibilities are allocated, and policy interventions are defined in line with the Plan’s strategic objectives and target outcomes. Depending on how chapters are configured, the Plan can take on a more territorial, sectoral, or, according to the Council's partial negotiating stance on the Commission's proposal (Council of the

European Union, 2026a), a combination of both. This design choice has significant implications for the overall capacity to coordinate policies effectively. In the territorial scenario, the adopted governance model entails integration among the bodies responsible for individual policies. Under the sectoral scenario, preference is given to a single-policy approach, moving integration upstream to the definition of programme strategy and objectives. Finally, the third option introduces a hybrid model: chapters remain sectoral, but their delivery relies on delegated administrative bodies operating under a territorial governance framework.

3.2. Performance framework

Beyond following the general framework of the National Recovery and Resilience Plans, the NRPP also borrows several operational mechanisms, notably the performance-based approach. Under this model, the Commission's reimbursements to Member States will no longer depend on incurred expenditure, but rather on the achievement of results. These results are measured through milestones (qualitative achievements, such as the adoption of a reform or regulation) and targets (quantitative achievements set out in the programming phase). The introduction of this system implies that the implementing Member State assumes the responsibility for achieving the programme's objectives strictly within the established timelines.

The introduced framework is intended to overcome the fragmentation of current programming, establishing an architecture designed to consistently track programme progress and spending impact. In this regard, it must nonetheless be stressed that policies with different objectives, funding mechanisms, and delivery models (such as the CAP) are brought together under the same framework, still entailing the need for separate rules to account for the specificities of these policies.

The framework provides for mechanisms, such as those relating to controls, intended by the Commission to reduce the administrative burden for both Member States and the Commission by an estimated 25% (European Commission, 2025f, 2025g). For agricultural policies, several innovations borrowed from cohesion policy are being introduced, reshaping traditional data collection and management workflows. Their implementation will require significant investment from the administrations involved in the programme, alongside potential increases in compliance obligations for beneficiaries.

The minimum monitoring unit is the "intervention field" as set out in the Regulation proposal on the Performance framework (Annex 1, COM(2025) 545 final), a predefined set of targets to which interventions will be linked. For each of these, its impact on the general objectives of the Plan (climate change mitigation, climate change adaptation and resilience, environmental, and social objectives), along with its corresponding output and result indicators, must be determined. Failure to achieve an agreed milestone, target, or output indicator triggers a suspension or proportional reduction targeted at the specific measures concerned (European Commission, 2025b). In such cases, Member States are required to maintain payments to beneficiaries and final recipients.

The system introduced has faced sharp criticism from the European Court of Auditors (2026a and 2026b). The Court points out that the heralded simplification primarily concerns the relationship between Member States and the Commission, whereas at the national level, the administrative burden on administrators and beneficiaries could remain unchanged, if not increase.

The European Court of Auditors also criticises the proposed methodological framework for focusing more on tracking expenditure than evaluating the long-term impacts of policies (a point closely tied to the quality of spending, as outlined below). Not surprisingly, many “sectoral interventions” lack a result indicator, and the regulation itself fails to define long-term impact indicators. Darvas *et al.* (2026) also highlight the need to ensure a strong focus on results, noting that certain result indicators are closer to being input indicators. In this regard, it is argued that an expenditure process tied strictly to implementation ultimately loses sight of the quality of spending incurred (Busse *et al.*, 2026; European Court of Auditors, 2025; Corti, 2024).

Again, Matthews (2026a) highlights that the system fails to assess spending impacts in terms of European added value, defined as the additional benefit generated by an EU-funded investment compared to purely national expenditure.

The new framework traces added value back to structural simplification, strategic efficiency, and a results-oriented approach, focusing more on the efficiency of the overall system rather than on the Fund’s effectiveness in meeting aggregate needs.

3.3. *Agricultural and Cohesion policy integration*

Numerous studies have analysed the effects of the Cohesion Policy and spatially-tailored measures of the CAP on the territorial development of rural areas and their impact in reducing economic disparities between territories (see the Literature Review Section in Pupo D’Andrea *et al.*, 2025; Mantino, 2026). Although the findings do not converge, they all highlight the need for greater synergy between the CAP and cohesion policy, moving beyond the siloed approach of the CAP to foster more coherent policies. By bringing agricultural, social, infrastructural, and territorial policies under a single programming instrument, the Single Fund envisaged in the reform proposal could, in principle, serve to combine interventions in support of broader rural strategies (Mantino, 2026). However, the “one single plan per Member State” approach (European Commission, 2025d) presents several critical issues which, if not properly addressed, risk undermining the effectiveness of this integration. First, integration depends on the political choices of Member States, their programming capacity, and their willingness to build a rural policy framework within which to integrate and coordinate funds. Second, cross-fund integration requires the definition of clear governance mechanisms for designing, implementing, and managing cross-policy linkages. Third, there is a lack of ring-fenced resources for rural development, which must instead compete with other policies, most notably Cohesion, for the unallocated share of the Plan’s resources. In the absence of a well-defined territorial and rural strategy, and given the scarcity of resources, there is a risk of intervention fragmentation in favour of tried-and-tested measures that offer easier absorption capacity but are not necessarily those most needed to meet the requirements of rural areas (Mantino, 2026; Mantino *et al.*, 2026).

The Commission itself, however, appears to reaffirm the importance of rural areas by introducing the concept of “rural target” in response to criticism following the reform proposal, and by earmarking, for now solely through a letter dated 9 November 2025 from President von der Leyen to the President of the European Parliament and the Prime Minister of Denmark (President-in-Office of the Council), 10% of the Single Fund’s resources (Von der Leyen, 2025). The percentage applies to the NRPP envelope excluding the amounts allocated to the CAP and the Common Fisheries Policy.

In this respect, it affirms the need to intervene in rural territories in a coordinated and target-based manner to launch complex, multifaceted development processes. All this aligns with the process initiated by the Communication “A Long-Term Vision for Rural Areas” (European Commission, 2021), in which the CAP was identified as one of the most critical funding sources.

Moreover, splitting CAP interventions into two broad blocks raises several concerns. One relates to the role of rural development in the Commission’s vision and the return to a siloed, sectoral approach to agriculture. According to some authors (Becker, 2026), driven by farmer protests, the Commission's proposal takes a step backwards from the evolution of an agricultural policy in which territorial interventions had gained significant ground. This U-turn can be viewed optimistically through the lens of Member State discretion, or pessimistically as a rethink of agriculture’s role in rural areas: driver of growth, or a constraint to be addressed through other policies? Another critical issue lies in the sharp separation between the two blocks of instruments: one targeting agriculture and farmers, and the other addressing rural areas but excluding agriculture. This logic represents a step backwards from a systemic vision consolidated over decades (Buckwell *et al.*, 1997; Saraceno, 2003) which underpinned the Agenda 2000 reform and the emergence of the CAP’s second pillar (Buckwell, 2017). By decoupling agriculture from rural development and decontextualising farmers from the environment in which they live and work, the reform fails to recognise the need to ensure complementarity between the agricultural sector and the overall rural economy. Yet the gradual integration of systemic interventions within the CAP over the past three decades has undoubtedly fostered supply chain integration and cooperation, process innovation, and the development of local economies closely intertwined with agricultural and agro-pastoral activities. Under the new programming framework, these processes can only be safeguarded through well-defined objectives and intervention instruments capable of bridging different policy domains. The responsiveness of programme planners to the diverse needs of territories becomes crucial, avoiding needless competition at the local scale in favour of approaches that concentrate resources and pinpoint the tools best suited to local requirements.

Integration between the CAP and Cohesion policy should also encompass the CAP’s omitted interventions. These are traditional rural development measures left out of the proposed regulation (structural and infrastructural investments, diversification, water resources, and, prior to the Presidency’s suggested amendments (Council of the European Union, 2026c), the processing and marketing of agricultural products). While these measures could find a place among the interventions of the Single Fund through strong national negotiations, it is still uncertain whether they will be restricted to rural areas or spread across all territories like other CAP measures.

3.4. The Issue of financial resources

The phasing out of dedicated funds exclusively earmarked for the CAP is another major novelty of the reform proposal. The stated objective is to establish a stable regulatory framework under shared management by simplifying and harmonising rules, thereby reducing the number of programming documents and easing the administrative burden on national and regional authorities (European Commission, 2025e).

The issue of financial resources can be examined along three distinct lines: the volume of funding, the identity and specific character of expenditure, and the quality of spending.

Volume of funding. On this issue, a substantial body of literature highlights the reduction of CAP resources under the proposed MFF (Matthews, 2025a; Hansum *et al.*, 2025; European Parliament, 2026; Copa-Cogeca, 2025). Assessments regarding the scale of the cut are not unanimous, with some even questioning the direction of the change. Matthews himself, within just a few months, revised the pessimistic stance he took immediately following the publication of the proposals (Matthews, 2025b). The divergence in views arises because of the perceived impact on CAP envelopes which varies considerably according to which expenditure categories are incorporated (whether only income support and thus ring-fenced amounts, or also the broader rural development component whose allocation is not predetermined) and the baseline parameters adopted (constant vs. current prices, absolute vs. relative amounts, or the CAP's proportionate share of the aggregate EU budget). Nonetheless, these contributions share several common elements: first, the volume of resources allocated to the CAP is inexorably linked to the overall envelope available under the MFF: should an agreement be reached on a downward revision, which policies would bear the brunt of any funding cut? A second shared theme is the role of Member States and their willingness and/or capacity to defend CAP resources during internal negotiations among national authorities. This issue is particularly critical for the financing of interventions that draw from the unallocated portion of the Fund, directly competing with other policies. Ultimately, the resulting resource distribution may reflect the balance of power among competing national ministries rather than the actual needs of territories (Sotte, 2026; Erjavec *et al.*, 2025).

On the institutional front, strong pushback from Member States, most notably the “Friends of Cohesion” group (Council of the European Union, 2026b), as well as farming lobbies (Copa-Cogeca, 2025; Farm Europe, 2025) and the European Parliament (2026) on the issue of CAP resources prompted the Commission President to revise her initial allocation (Von der Leyen, 2025). Alongside the funding earmarked for the rural target, the President pledged to strengthen the “Unity Safety Net” for market crises and to allow Member States to frontload part of the mid-term reserve for the CAP (Von der Leyen, 2026). This proposal would modify the overall resources available to the CAP, as frontloading effectively ring-fences part of the reserve for the CAP, thereby reducing the budget envelope available for Cohesion policy.

Yet the reform, by abolishing dedicated funds, also raises serious concerns regarding the predictability and certainty of financial resources for beneficiaries. First, CAP allocations will become definitive only upon formal approval of the NRPP by the Council and once national rules setting eligibility criteria are formally adopted (Matthews, 2026a; European Court of Auditors, 2026a; Pereira dos Reis and Hoernig, 2026). Second, ongoing and future negotiations could dilute the overall ambition of the MFF, thereby shrinking the resources allocated to the Single Fund and, by extension, to the CAP. This directly points to the question of the identity of CAP funding.

Identity of Resources. The dismantling of the two funds specifically earmarked for agricultural and rural support marks a radical departure from earlier debates regarding the consolidation of farm funding and the feasibility of bringing interventions with distinct financing rules, disbursement schedules, and reporting procedures under a single regulatory framework. The proposed abolition of the funds does not resolve this critical issue, as the operational rules governing the various interventions remain distinct, albeit embedded within a broader overarching framework that enforces a more horizontal and flexible resource management model. This raises the issue of the identity and speciality of CAP resources. Tedioli (2026) points out that abolishing the funds is compatible with

the Treaties, as the establishment of one or more agricultural funds is an option granted to EU legislators rather than an obligation (Article 40 TFEU). The question of adherence to the “principle of speciality” of this expenditure, namely the functional specialisation and earmarking of agricultural resources (p. 9), is however another matter. Article 38 TFEU states that “the Union shall define and implement a common agriculture and fisheries policy”, entailing its own objectives, instruments, and resources. Although the Single Fund incorporates formal safeguards, such as a dedicated chapter for the CAP, ring-fenced resources for income support interventions, and separate-accounting safeguard rules, the author argues that the long-term sustainability of this speciality remains an open question in the face of emerging priorities or tighter budgetary constraints, which could ultimately dilute the identity of the expenditure.

Quality of spending. The Partnership Plan mirrors the national RRP model, which links financial support to reforms and investments by adopting a performance- and results-based delivery logic. In principle, this should safeguard the quality of spending. However, the literature has highlighted a series of critical issues emerging from the national RRP experience. First, the RRP model has been proposed without any prior evaluation of what it entailed in terms of actual impact, organisational arrangements, or management practices. Even assuming the RRP model as the most efficient, implementation has underscored a fundamental problem with measuring performance: certain interventions, reforms in particular, will only produce measurable outcomes over the medium-to-long term (Leino-Sandberg, 2026; Busse *et al.*, 2026). Further critical issues stem from lessons learned during plan drafting (Busse *et al.*, 2026): excessive complexity and the proliferation of milestones and targets. This issue proves especially challenging for regionalised Member States, which must reconcile the territorial dimension of the CAP with the definition of milestones and targets that are appropriate in both number and quality. Furthermore, there is the need to pace expenditure to improve the absorption capacity of funds and find the right balance between the ambition of the plans in delivering benefits and their operational feasibility.

Other critical issues pertain to the RRP model itself. When assessed through the lens of democratic governance, financial accountability and efficient resource allocation, the Plans showed significant critical issues (Leino-Sandberg, 2026). The author points out that the shortcomings relate to the limited capacity of the plans to ensure that resources are primarily channelled towards delivering European added value. According to Leino-Sandberg, the risk is perpetuating the national RRP experience, which funded thousands of small-scale projects whose actual contribution to EU priorities remains questionable. This concern has also been underscored by Matthews (2026a), who highlights that the overarching challenge for the future CAP is to prioritise expenditure that demonstrates the highest European added value. However, the proposed model, with the broad margin of discretion granted to Member States, makes this objective difficult to achieve. This concern is also echoed by the European Court of Auditors (2026a), which underscores that the discretion left to Member States in designing interventions to address domestic needs will ultimately determine whether, and to what extent, the Plans contribute to EU added value.

4. The state of negotiations: the position of EU institutions and the interests of Italy

4.1. The position of EU institutions

The proposed NRPPs entail a structural shift in how CAP negotiations are conducted, as they are now entrusted to horizontal bodies such as the General Affairs Council (GAC), reducing the centrality of traditional agricultural decision-makers. Sectoral ministries are involved only at a subsequent stage, on relevant regulatory provisions (Régnier *et al.*, 2025).

According to some authors (Varotto, 2026), the depth of the proposed changes extends far beyond mere financial issues, new priorities, and budget architecture; rather, it heralds a new political, institutional, and territorial order for the EU, on which the main EU institutions have taken a stand.

The European Parliament, in its interim report on the MFF proposal (European Parliament, 2026), expresses some concern about the shift of key policy and budgetary decisions from basic legislative acts to Commission work programmes. Such a shift would curtail Parliament's legislative authority to the detriment of the oversight and democratic accountability functions exercised by the Assembly. Regarding the proposals, it calls for a more substantial MFF budget commensurate with the Union's political ambitions. It considers that the "single plan per Member State" approach risks fostering a multi-speed Europe, demanding the establishment of mandatory regional chapters within the NRPP alongside the direct involvement of regional and local authorities in designing, implementing, monitoring, and evaluating the Plans. Finally, it emphasises that the MFF must focus on financing public goods that deliver European added value.

The European Committee of the Regions (2026) focuses attention on territories and on the strengthening of multilevel governance to ensure the participation of sub-national levels of government in accordance with the principle of subsidiarity. For this reason, it proposes the inclusion of a territorial chapter in the NRPP, the preparation of territorial impact assessments for each NRPP by the Member State, and a strengthening of both the territorial component in the Commission's assessment of the NRPP and the establishment of a minimum target of 20% of national allocations for integrated territorial development strategies. It also proposes the reintroduction of funds supporting the NRPPs and a pre-allocated budget for cohesion policy support to all regions.

The European Economic and Social Committee emphasises the role of civil society, calling for the strengthening of the partnership principle and funding for capacity building of civil society organisations and social partners (European Economic and Social Committee, 2026).

On 16 June 2026, the Council reached a partial general approach on the draft Regulation on the Single Fund, which confirms support for the NRPPs and paves the way for discussion on their architecture and operating rules, as well as, of course, on financial aspects. The Council calls, among other things, for greater involvement of regional and local authorities in the preparation, implementation, and evaluation of the Plan, providing for the possibility of direct negotiations with the Commission should a Member State decide to establish regional chapters, reflecting the proposals set out by President von der Leyen in her letter of November 2025. Regarding the CAP, the Council suggests transferring all sectoral rules to the relevant CAP regulation. As this is a partial general approach, all financial matters are excluded from the Council's text, which consequently does not incorporate the changes proposed in President von der Leyen's letters. While the transfer of agricultural provisions back to sectoral legislation was welcomed, it was considered by several

Member States as a necessary but insufficient step to address the concerns surrounding the inclusion of the CAP into the NRPP framework. Specifically, Member States highlighted that several key agricultural provisions were not transferred to the sectoral CAP and CMO regulations, while cautioning that additional expenditure might burden the ring-fenced CAP budget without sufficient funding. Significant concerns were also voiced over potential approval delays for individual NRPPs, the ambiguities of the control framework and the challenges inherent to a performance-based delivery model (for further details on the statements expressed by Member States, see Council of the European Union, 2026d).

More generally, the Council's position tends to strengthen the role of traditional policies, namely the CAP and Cohesion policy, within the Single Fund, reaffirming their contribution to the Treaty objectives. The amendments concerning Cohesion policy should be understood in this context.

4.2. The interests of Italy

In the debate on the proposed reform of the 2028-2034 MFF, Italy adopted a critical stance, highlighting concerns about a reduction in the resources available for agricultural and Cohesion policies. It also joined other Member States, the "Friends of Cohesion", in endorsing a joint letter urging the Commission to preserve the financial allocations assigned to long-established EU policy areas.

From an agricultural policy perspective, Italy's criticisms extended well beyond the financial dimension, encompassing the potential implementation and administrative challenges associated with the future programmes envisaged under the proposed regulatory framework. Particular concern was directed at the division of agricultural support into two blocks. Italy endorsed the Council's position that key agricultural provisions should be transferred to the CAP-specific sectoral regulation, considering this necessary to preserve a clear and coherent regulatory framework for direct beneficiaries. Italy also endorsed the Council's position, which resulted in the inclusion of the measures supporting the processing and marketing of agricultural products among those targeting farms.

Throughout past reforms, Italy has consistently maintained a cautious stance regarding the redistribution of direct payments among beneficiaries, retaining the entitlements system and taking advantage of the option to adopt partial convergence, namely, reducing rather than eliminating disparities in payment entitlement values per hectare. In the 2023-2027 CSP, national decisions were driven by the need to ensure greater equity in the distribution of support to small and medium-sized farms and rural areas, while simultaneously avoiding destabilising impacts on farms affected by support reductions. Although these are sensitive topics for Italy, the proposal to definitively phase out payment entitlements and complete internal convergence under the CAP 2028-2034 has not triggered any significant pushback. These issues are not raised in Italy's position papers within the European negotiations, even though it should be stressed that Italy is currently focused on broader questions regarding the positioning of the CAP within the NRPPs. Nor are these issues found among the demands put forward by regional authorities within the State-Regions Conference.

Italy, however, plays a leading role in the debate on the governance issue. Among the proposals for managing the Single Plan, agricultural authorities have supported strengthening the "hybrid model" proposed by the Council, which would allow Italy to largely replicate the governance

structure of the current 2023-2027 CSP, which entrusts overall programme management and the implementation of Pillar I measures to the Ministry, while the implementation phase, primarily for rural development measures, is delegated to the Regions through the execution of the Regional Rural Development Complements (Complemento di sviluppo rurale - CSR). Last July, an agreement was reached in the State-Regions Conference that aligns positions toward this management model, in light of the well-established organisational structure and the resulting investments in human and operational resources made over time (Conferenza delle Regioni e delle Province Autonome, 2026).

4.3. The advancement of negotiations

Negotiations on the MFF are ongoing. In June 2026, the Council agreed on its partial negotiating stance on the proposed regulations for the NRPP (16 June), the Performance Framework (26 June), and the European Regional Development Fund and Cohesion Fund (29 June). During the same month, the Cypriot Presidency of the Council of the EU circulated the second Negotiating Box, following the one forwarded by the Danish Presidency in December 2025, which served as the basis for a political debate among Heads of State and Government at the European Council meeting on 18-19 June 2026. In the second half of 2026, under the Irish Presidency, the Negotiating Box enters its most intensive negotiating phase, with an updated Negotiating Box expected on 15-16 October. The objective is to reach a unanimous agreement within the European Council on the overall budget figures (MFF) and sectoral allocations by the end of 2026.

Meeting this timeline will allow trilogues between the Council, the European Parliament, and the Commission to begin, aiming to reach an agreement on the MFF, own resources, and sectoral regulations by the end of 2027. By this date, Member States will need to submit their draft NRPPs for Commission approval to ensure their entry into force in January 2028. Failure to meet these deadlines would give rise to the need to provide for an extension, even a partial one, of the current programming period, which would ensure the continuity of annual disbursements, such as direct payments, but would prevent the start of the measures planned in the Plans.

At the current stage of the talks, it remains difficult to foresee the landing zone, as discussions are taking place across multiple levels. Upcoming Council meetings will be decisive, particularly regarding the overall volume of resources allocated to the MFF and, consequently, to the CAP.

5. Taking stock of key reflections

The European Commission's proposal for the 2028-2034 MFF is set against a period of widespread global economic, social, and political instability. Aimed at boosting European competitiveness and preparing Europe to respond to crises, the proposal represents a reorganisation of EU financial resources, policies and priorities. Under the new policy architecture based on NRPPs, the reform proposes greater national flexibility, a new multi-level governance model and a stronger orientation toward performance-based policies. This is an ambitious project that builds on the experience of the national RPPs, which have certainly achieved positive results in terms of the attainment of milestones and targets relevant to the context in which policies operate. However, its ultimate effectiveness remains to be assessed, as the programmes have only just concluded.

Integrating the CAP into this framework addresses a need long highlighted in the literature for effective territorial and rural development. The proposed NRPPs are theoretically a powerful programming tool capable of fostering integrated strategies and overcoming the logic of policy fragmentation. However, their actual effectiveness depends on numerous factors highlighted in the reflections outlined above.

NRPPs achieve an integration of programmes, yet the underlying policies and their respective instruments remain distinct. Any synergy between the CAP and Cohesion policy is primarily realised through interventions funded by non-ring-fenced resources, for which these policies compete. It is, therefore, an integration driven by administrative competition over resources during the policy budget allocation process. The outcome will depend on domestic negotiations, shaped by both technical and political dynamics, which will be crucial to manage effectively in order to maximise both the efficient use of resources and the final allocation dedicated to the CAP.

All this leads to a second consideration. The flexibility granted to Member States should, in principle, allow for the design of strategies and interventions more closely aligned with local needs, in keeping with the principle of subsidiarity. However, subnational territories themselves are the weakest actors in this proposal. Their actual involvement will hinge on the establishment of a robust governance framework which, particularly in regionalised States such as Italy, must actively engage both national and regional authorities, as well as a strong multi-stakeholder partnership capable of voicing all demands, including local territorial priorities.

The flexibility granted to Member States is also seen by many commentators as a risk of policy renationalisation, which could generate imbalances and cross-country competition to the detriment of the Plans' alignment with EU-wide targets (European Parliament, 2026; Tedioli, 2026; Mendez *et al.*, 2026). A substantial debate has emerged around the quality of spending, both regarding the Plan's genuine capacity to measure policy performance and in terms of its contribution to European added value. While these concerns will likely remain in the background within such a complex reform process, they will undoubtedly serve as the benchmark for assessing the ambition of the Plans and their contribution to broader EU objectives.

In the context of NRPPs, the role of the CAP is significantly downgraded, not so much, perhaps, by the volume of resources allocated to it, but by its loss of centrality within the EU project. Not only is the CAP integrated into a multi-fund programming framework, but its salient features are fundamentally redefined. The traditional distinction between pillars disappears in favour of interventions classified by beneficiary type: on the one hand, income support consolidating all farm-targeted interventions; on the other, "systemic" or territorial measures. While the former benefit from a pre-determined regulatory ring-fencing of resources, the latter will have to compete with other sectoral policies to secure unearmarked funds from the Single Fund. Even though nearly all traditional CAP instruments are retained, one is left with the impression of a step backward, a return to a predominantly sectoral approach to agriculture that shifts the second pillar's most distinctive structural measures into the pool of unallocated single-fund resources. This raises concerns about how to ensure an effective multi-level participatory governance for rural areas.

The European Commission placed strong emphasis on the simplification expected to stem from the new programming framework. However, many observers argue that the framework offers far less simplification than claimed. The European Court of Auditors (2026a) points to a "paradox of complexity": tasked with the implementation, monitoring, and financial control of expenditure,

national authorities will consequently be forced to overhaul their administrative and management structures.

Much has been said regarding the resources made available by the 2025 proposal. The widespread criticism of the proposed allocations prompted the Commission to revise the figures, particularly for agricultural policy. Even though the question of overall volume has been at least partly settled, the predictability of budgetary resources remains a critical issue. Only once the programming phase is finalised will the total funding of the Plan and the specific amounts available for each individual policy be known.

The ongoing negotiations and strong resistance to the proposal offer no certainty regarding the timeline for adopting the MFF and its related regulations. The dynamics of the negotiations and the sheer number of unresolved issues also make it difficult at present to foresee the outcome of the reform or the actual shape the Plans will take: a mere aggregation of separate programmes, or a genuinely synergistic catalyst? The answer will ultimately hinge on the final agreement reached and, to the same extent, on how Member States will implement the reform.

As to limitations, the analysis relies on the state of play of an ongoing process, drawing also on grey literature, and blog posts available as of 25 September 2026. Nevertheless, the insights offered by this work are useful for outlining future research directions, which should include, among other things, an *ex ante* impact assessment of the NRPPs, the design of an evaluation framework for a performance-based CAP, and an analysis of the implications of different governance models that could be implemented.

Author Contributions

M.R.P.D.A and S.T.: Conceptualization, Methodology, Writing- Original draft preparation. Writing-Reviewing and Editing.

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