

## THE GREEN DEAL POSSIBLE IMPACTS ON CEREAL AND OILSEED SECTORS AND THE CAP “GREEN ARCHITECTURE” IN BULGARIA

Nataliya Shukadarova

Agricultural University – Plovdiv

E-mail: [njtodorova@abv.bg](mailto:njtodorova@abv.bg)

### Abstract

The paper examines the new European growth strategy – the Green Deal in the aspect of its design for a fair, healthy and environmentally-friendly food system. The Green Deal’s targets set through the Farm to Fork and the Biodiversity strategies are considered in connection with the arable crops sector. The paper also outlines the link between the post-2020 Common Agricultural Policy (CAP) reform and the implementation of the Green Deal objectives.

This article summarizes the analyses and studies conducted thus far in regard to the Green Deal impacts on the European cereal and oilseed sectors. The European Commission still neglects the need for a thorough and cumulative impact assessment of the Green Deal’s Farm to Fork and Biodiversity strategies. Nevertheless, several recently published studies on these strategies indicate that the current targets, if implemented as proposed, will come at a significant cost for the EU farmers and the viability of the entire European agribusiness sector.

Furthermore, the paper reviews the current situation of the “green architecture” in the National Strategic Plan of Bulgaria for the new Common Agricultural Policy. The Bulgarian agricultural society also needs certain data and projections about the future agri-food systems development, because the unknown is frightening. The idea behind this research is to open the curtain of possible effects and impacts of the Green Deal through the CAP “green architecture” on the Bulgarian grain production sector.

**Keywords:** Green Deal, Farm to Fork Strategy, Biodiversity Strategy, Common Agricultural Policy, Strategic Plan, green architecture, cereals, oilseeds, Bulgarian grain producers

### INTRODUCTION

The European Green Deal marks the beginning of a new stage in the agricultural development and the agro-food system in Europe. In the Communication about the Green Deal, the European Commission (EC) points out that European food is famous for being safe, nutritious and of high quality. It should now also become the global standard for sustainability. Although the transition to more sustainable systems has started, feeding a fast-growing world population remains a challenge with current production patterns. Food production still results in air, water and soil pollution, contributes to the loss of biodiversity and

climate change, and consumes excessive amounts of natural resources, while an important part of food is wasted. (EC, the European Green Deal, 2019)

The Green Deal sets ambitious ecological goals to be reached by 2030 and incorporated in the Farm to Fork Strategy and the Biodiversity Strategy. Several partial impact assessments on the Green Deal’s strategies have been conducted so far by outside institutions and interested actors. All of the studies reveal a decrease in cereal and oilseed production in Europe, a negative effect on the European trade and a reduction in farm income. The Bulgarian grain production sector is supposed to endure some changes in the conventional agricultural

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practices. A shift to more sustainable production methods is expected to be adopted by the Bulgarian farmers. However, in a second phase, this may result in lower cereal and oilseed yields and lower revenue for the farmers. The main objective of this research is to reveal the Green Deal's possible impacts through the CAP "green architecture" on the sustainable development of the Bulgarian grain production sector.

## MATERIALS AND METHODS

To carry out the study, different approaches have been used: specifically, an in-depth analysis of a large body of documentation (official texts, academic papers and reports, etc.), statistical data, as well as expert consultations.

The analysis of the abundant documentation provided by the European Commission, for both the Green Deal and the CAP, is supplemented by an analysis of institutional and stakeholders' reactions, statements or reports from national and European authorities, farmers' organizations or non-governmental organizations, etc. Quantitative elements are provided to illustrate the potential impacts of future policy options. Attention is focused on economic indicators and outcomes.

The research methods used for the Bulgarian aspect of the Green Deal impact are descriptive analysis on the National Strategic Plan, deductive analysis, summaries and recommendations. Data is extracted from centralized (Agrostatistics, etc.) and decentralized (interviews with stakeholders, observations) sources.

## RESULTS

The Farm to Fork Strategy is at the heart of the Green Deal. It addresses comprehensively the challenges of sustainable food systems and recognises the inextricable links between healthy people, healthy societies and a healthy

planet. The strategy is also central to the Commission's agenda to achieve the United Nations' Sustainable Development Goals (SDGs). (EC, A Farm to Fork Strategy, 2020)

To support the long-term sustainability of both nature and farming, the Biodiversity strategy will work in tandem with the new Farm to Fork Strategy and the new CAP, including by promoting eco-schemes and result-based payment schemes. In implementing the Biodiversity and the Farm to Fork Strategies, the Commission will closely monitor progress and improvements in terms of food security and farmers income. The Commission will ensure that the CAP Strategic Plans are assessed against robust climate and environmental criteria, and that Member States set explicit national values for the relevant targets set in this strategy, as well as in the Farm to Fork Strategy. These plans should lead to sustainable practices such as precision agriculture, organic farming, agroecology, agro-forestry, low-intensive permanent grassland, and stricter animal welfare standards. (EC, Biodiversity Strategy, 2020)

The Green Deal sets several clear goals through the Farm to Fork and the Biodiversity strategies, that would influence a lot the current European agricultural systems, and these are:

- to reduce the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030;
- to reduce nutrient losses by at least 50% and reduce the use of fertilisers by at least 20% by 2030;
- at least 25% of the EU's agricultural land must be organically farmed by 2030;
- at least 10% of agricultural area under high-diversity landscape features.

The Strategies' policy targets represent a fundamental shift in the EU food and agriculture industry. That is why these targets have been subject to a wide discussion amongst the interested actors.

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### **The Green Deal possible impacts**

Several recently published studies on the Farm to Fork and the Biodiversity strategies indicate that the current targets, if implemented as proposed, will come at a significant cost for the EU farmers and the viability of the entire European agribusiness sector (“Farm to Fork – it is time to listen to what the data says”, 2021).

The Joint Research Center (JRC) technical report presents a modelled scenario of an ambitious implementation of the CAP reform proposals to measure the effects on the EU agriculture including four quantitative targets put forward in the Farm to Fork and Biodiversity strategies already reflected in the recommendations of the Commission to the Member States on their CAP Strategic Plans. The analysis includes a reduction of the risk and use of pesticides, a reduction of nutrient surplus, an increase of area under organic farming and an increase of area for high-diversity landscape features. According to the JRC report in the CAP Legal Proposal scenario (which includes potential implementation of the CAP post-2020 legal proposal targeting the above-mentioned objectives): cereals supply drops by 13% and oilseeds supply by 12%; producers’ prices increase by 7% for cereals and 8% for oilseeds; producers’ total revenues for cereals drop with approx. 6 000 000 euro and for oilseeds with approx. 1 500 000 euro (Barreiro-Hurle et al., 2021).

In order to examine the prospective market and food security impacts of the EC proposal the United States Department of Agriculture (USDA) focuses on several selected agricultural input reductions specified in the Green Deal’s Strategies: reduction of pesticide use by 50%, reduction of fertilizer use by 20% and removal of 10% of the existing farmland from agricultural use. In the EU-only scenario (which assumes the EU alone implements the Strategies and trade is permitted normally): the gross farm income in the EU falls by 16%; wheat production in EU drops by 48.5%, cereal grains by 20% and oilseeds by 60.7%; market

price in EU increase by 71% in wheat, by 96.3% in cereal grains and by 93.3% in oilseeds; import volume in the EU increases by 18.4% in wheat, by 3.8% in cereal grains and by 6.6% in oilseeds; export volume in EU drops by 82.4% in wheat, by 34.2% in cereal grains and by 84.6% in oilseeds (Beckman et al., 2020).

In the Wageningen University’s report, four scenarios have been developed for which the impacts have been assessed: (1) reduction of use and risk of pesticides, (2) reduction of use and losses of nutrients, (3) increase of area under organic production and (4) a combination of the Scenarios 1 and 2 extended with the added objective to have more land with high-diversity landscape features. In Scenario 4 the overview of production impacts in EU-27 shows reduction ranging between 12 – 18% for wheat, maize, rapeseed; the impact on the value of projected changes in production for EU-27 has been estimated to decrease by 3,567.1 million EUR in wheat, by 1,625.4 million EUR in maize and by 1,238.4 million EUR in rapeseed; more limited price impacts are expected in the case of maize, rapeseed and wheat (increases below 7%) (Bremmer et al., 2021).

The University of Kiel’s simulation study points out that the Farm to Fork strategy would lead to a significant decline in production and a respective price increase within the EU, with the reduction of the N-balances by 50% generating the strongest effects. In practice, the decrease in production ranges from 21.4% for cereals and 20% for oilseeds throughout the EU. The cereal and oilseed areas would only be reduced by 2.6% and 6%, respectively. When compared to the N-balance reduction of 50%, all other Farm to Fork measures would lead to more moderate production adjustments which generally lie below 10%. The strong decrease in production would imply an equally significant price increase within the EU: price increases for crops would vary between 18% for oilseeds and 12.5% for cereal. In parallel to the production impacts, the strong price effects could also be attributed to the N-balance reduction of 50%,

while the price effects of the other Farm to Fork measures would yield a moderate increase of 5%, with the exception being the reduction of pesticides, which would lead to a price increase of 10% for oilseeds (Henning and Witzke, 2021).

According to the HFFA research paper the assumed production cuts in 2030 of full implementation of the Farm to Fork and the Biodiversity strategies in the EU are estimated at 26% for wheat, 22% for corn, 23% for other cereals, 22% for sunflower seeds and 22% for other oilseeds (Noleppa and Carlsburg, 2021).

In the COCERAL impact assessment, three scenarios were considered depending on the area of arable crops impacted as compared to the total agriculture area: a low impact, a medium impact and a high impact scenario. For example, under the medium impact scenario, 37.5% of the set-aside requirement is met on arable land and 62.5% on other agricultural lands. A fourth scenario (extreme impact) considers the implementation of the Farm to Fork targets only on arable land, especially the set-aside and organic targets. According to the medium impact scenario by 2030: wheat production would drop to 109.2 million tones (in comparison the baseline is estimated at 128.0 million tones), corn production would drop to 58.8 million tones (in comparison the baseline is estimated at 68.0 million tones) and oilseeds production would drop to 24.9 million tones (in comparison the baseline is estimated at 30.2 million tones); net grain trade is estimated to become negative by 18 million tones; and oilseed imports are estimated at 26.9 million tones (“COCERAL Impact Assessment”, 2021).

### **The CAP “green architecture” in Bulgaria**

The CAP reform proposal contributes to the EU’s environmental, climate, and biodiversity protection commitments set in the European Green Deal through the so-called “green architecture” that includes: enhanced conditionality, which links CAP payments to a range of obligations; the new “eco-schemes”

that aim to reward farmers for going further in the implementation of sustainable agricultural practices; and environmental and climate management commitments under the rural development framework, which aim to compensate farmers and other beneficiaries for voluntarily committing themselves to implement sustainable practices. Based on a thorough assessment of the local conditions and needs, Member States will produce a national CAP strategic plan which has to be coherent and consistent with the required environmental ambition. Quantified targets will allow the Commission to monitor the progress made by the Member States when implementing the CAP. (EC, *Analysis of links*, 2020).

Several good agricultural and environmental condition standards (GAEC standards) and statutory management requirements (SMR), included in the national draft of the Strategic Plan as part of the enhanced conditionality, concern the arable crops and the grain production in Bulgaria. These are: GAEC 2 protection of wetland and peatland; GAEC 3 ban on burning arable stubble; GAEC 4 establishment of buffer strips along watercourses; GAEC 5 tillage management, reducing the risk of soil degradation and erosion, including consideration of the slope gradient; GAEC 6 minimum soil cover to avoid bare soil in most sensitive periods; GAEC 7 crop rotation in arable land, except for crops growing underwater; GAEC 8 minimum share of agricultural area devoted to non-productive areas or features; SMR 1 Directive 2000/60/EC in the field of water policy, regards mandatory requirements to control diffuse sources of pollution by phosphates; SMR 2 Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources; SMR 12 Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market; SMR 13 Directive 2009/128/EC concerning the sustainable use of pesticides (EU, Regulation

2021/2115).

GAEC 8 requires a minimum share of at least 4% of arable land at a farm level devoted to non-productive areas and features, including land lying fallow. At first glance, this would be probably the standard with the biggest influence on cereal and oilseed production and with the strongest potential to cause some changes in the structure of the grain farms in Bulgaria. Nevertheless, if we analyze the data in the Agrarian report 2021 – in 2020, the arable land reached 3,477,514 ha, which represents 68.9% of the utilized agricultural area. Arable land includes the areas where crop rotation is applied, temporary meadows with cereals and legumes, fallow land and greenhouses. Also, in 2020, the cereals are represented by 2,037,695 ha (58.6% of arable land), the oilseeds – by 1,008,255 ha (29% of arable land) and set-aside – by 161,565 ha (4.6% of arable land). Thus, in 2020, there is already above 4% of arable land devoted to land lying fallow. This fact could be easily explained with the widely implied by the Bulgarian farmers green measures under Pillar 1, one of which requires a minimum share of 5% of arable land devoted to ecological focus area (landscape features, land lying fallow and some other options). Again, according to the Agrarian report 2021 100% of the farmers who submitted applications for the Single area payment scheme parallelly submitted applications and for the Payment scheme for climate and environmentally friendly agricultural practices – green direct payments (Number of valid applications submitted: SAPS 56,830; GDP 56,830).

Under the Pillar 1 several voluntary eco-schemes, discussed at the Thematic Working Group for CAP 2021 – 2027, are of potential interest to the Bulgarian grain producers, and these are Eco-scheme for the maintenance and improvement of biological diversity and ecological infrastructure; Eco-scheme for preservation and restoration of the soil potential; Eco-scheme to reduce the use of pesticides; Eco-scheme for diversification of cultivated

crops.

The most popular amongst the Bulgarian cereal and oilseed producers is commonly expected to be the eco-scheme for the diversification of cultivated crops. The eco-scheme builds on the requirements of GAEC 7 in terms of the number of crops by providing greater diversity of crops on the farm. In agricultural holdings with arable land and/or areas occupied by medicinal and aromatic crops over 30 ha – there are at least 4 different crops on arable land and/or areas occupied by medicinal and aromatic crops. The main crop does not occupy more than 75% of this arable land and/or the areas occupied by medicinal and aromatic crops and the three main crops together cover no more than 95% of the arable land and/or the areas occupied by medicinal and aromatic crops. The eco-scheme would be attractive and accessible for the Bulgarian grain producers who have a long-time tradition in crop rotation on a plot level. Moreover, as could be seen from the previous program period's data and statistics the cereals and oilseeds farmers are willing to participate in voluntary green measures under Pillar 1.

Under the Rural Development Program, there is probably only one agro ecological intervention, discussed at the Thematic Working Group for CAP 2021 – 2027, that might attract the collective interest of the Bulgarian grain producers if decent remuneration is offered and this is “Intervention for the use of sustainable practices and varieties, cultivation under specific conditions”. The intervention has two main objectives: 1) encouraging the use by farmers of varieties developed for growing under specific conditions in the cereals and sunflower groups and 2) reduced use of plant protection products and application of sustainable practices in soil cultivation and maintenance. The intervention is a 5-year commitment and aims to stimulate conservation agriculture, minimum tillage, balanced fertilization and integrated production of plants and plant products.

Probably the most constraining issue for the Bulgarian grain producers in terms of the new ambitious ecological goals would be the reduction of the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030. First of all, what is the value of these targets if there is no precise public data to assess progress towards them? Currently, in the EU no one has a clear picture of which pesticides are used where, in which quantities and how and this is also the case in Bulgaria. This blind spot means trouble for everyone. Second, and it is very important, the lack of effective and affordable alternatives to chemical pesticides is the main production problem for grain producers. Since 2013 the European Commission has limited the sales of plant protection products of the neonicotinoids group in Europe. Almost 10 years later there aren't popular and mass alternatives of these products on the market especially when it comes to seed treatment of maize against wireworms and other insects. Thus, the EC sometimes speeds up the process with reforms and new regulations, but the research and development sectors are not in line with effective solutions.

According to the Institute of Agricultural Economics in Bulgaria, the expectations are for a strong impact in the direction of reducing the total crop production as a consequence of the reduced amount of used plant protection products, which in turn will lead to a decrease in productivity and yields. Production costs at a farm level are expected to increase as a result of the additional costs generated for the implementation of alternative methods of plant protection and production, storage and transport. At the same time, an increase in plant diseases and the spread of pathogens and other undesirable species can be expected, which will have a drastic effect on agriculture as a whole (Prognozna otsenka, IAE, 2020).

For now, nothing quite worrying has been written down in the National Strategic

Plan, but CAP won't be the only enabling framework for the transition set out in the Green Deal. Better implementation of existing obligations under EU legislation for example the Sustainable Use Directive (EC 2009/128) and the Nitrates Directive (EEC 1991/676) are planned to significantly contribute to the Green Deal targets. In addition, the revision of legislation on pesticides, animal welfare, environment and climate, as well as initiatives on clean energy and action plan on organic farming will consolidate a multilevel agricultural policy post-2020. The tight links between the CAP post-2020 and the other EU policies, demonstrated by the additional initiatives required for the implementation of the Farm to Fork and the Biodiversity strategies – such as the EU Nature Restoration Plan, the Renewable Energy Directive and the Emissions Trading Scheme – transfer the agricultural policy to a new level of the consolidated EU policy decision-making process (Barreiro-Hurle et al., 2021).

## DISCUSSION

The legal framework for the CAP reform won't affect the Bulgarian grain production in drastic magnitude, slight structural production changes might occur, new agro ecological practices might be adopted by the farmers. The enhanced conditionality is not stressful to the Bulgarian grain producers, since the norms have been already implied in the previous program period. A relatively small amount of arable land will be affected by the requirement for a minimum share of agricultural area devoted to non-productive areas or features. If enough financially stimulated the Bulgarian grain producers would take over voluntary eco-schemes and agro ecological interventions. A significant reduction in cereal and oilseed production is expected to occur if a strong reduction in pesticide use is legally imposed.

Furthermore, the new legal framework planned to be delivered in the next few years,

for example in regard to the Sustainable Use Directive, Organic farming plan, Renewable Energy Directive and Emissions Trading Scheme, has the potential to strongly impact and influence the conventional way of farming in the Bulgarian grain sector.

There are too many issues regarding the Green Deal objectives in terms of implication, indicators, progress, results that remain unaddressed. For example, what would be the indicator for measuring the pesticide reduction target, when obviously it won't be the Harmonised Risk Indicator I.

Another very important question is rising about the assessment of the National Strategic Plan by the European Commission: Would it be enough ambitious in terms of ecological and climate commitments?

A positive fact that should be underlined is the willingness of the Bulgarian grain producers to participate in voluntary green measures. In addition, a decent percent of the Bulgarian cereal farmers have already embraced environmentally-friendly production technologies and practices, such as conservation agriculture (no-till, strip-till and opti-till methods of soil management), precise agriculture, balanced fertilization, integrated plant production, etc. However, a small percent of the grain producers are reluctant to observe the new rules under the “enhanced conditionality” and to engage in new ecological commitments. If there is a risk of reduction in production, these farmers prefer to abstain from European funding and not to follow restrictive measures. The problem would become serious if the above-mentioned producers become more and cultivate large areas, thus threatening the achieving of the European Green Deal's goals.

What is sure, nevertheless, is the mere fact that the farmers need information, training and knowledge in order to be engaged in the green idea by their own beliefs.

## CONCLUSION

The Green Deal objectives set through the Farm to Fork and the Biodiversity strategies, which have to be reached by 2030, project an ecological and sustainable shift in the patterns of the agricultural and agro-food EU systems. The Green Deal impact assessment studies, published by external organizations, outline a strong reduction in cereals and oilseeds production in the EU, serious negative effects on European trade, decrease in farmers' income and eventual increase in consumers' prices.

The climate and environmental strategies in agriculture can be effective and accessible only if they are implemented in close cooperation with farmers, who are the main participants in their accomplishment. Farmers are under increasing pressure and the current agricultural system is not always able to provide purchase prices that guarantee adequate coverage of production costs. Moreover, strategies such as the European Green Deal further increase these costs. Without framework conditions for a fair agricultural system that covers production costs and the participation of farmers in the formulation of climate strategies, the reliability of food production in the EU is at stake. Member States' contribution to ambitious environmental objectives in the field of agriculture should be financially secure, ensure the economic stability of farmers and not compromise the EU's food security.

The majority of the grain farmers in Bulgaria understand and accept the main principles set out in the Green Deal's strategies and realise that systematic improvement must be made to ensure a more sustainable approach for the food and agricultural systems. However, when implementing the EU Green Deal targets some important issues need to be considered in order to mitigate impacts on farmers and to avoid breakdowns of the food chain. Tools such as alternative and effective measures to the use of plant protection products, better access to innovative technologies, flexibility for

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agriculture practices, proper information and training, also stimulating remuneration should be included and projected in the new food and agriculture policy. Sharp and fast changes should be avoided when it comes to agricultural policy; reforms need to happen step by step and gradually.

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