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Directorate-General for Environment (ENV)

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Subject: Position paper on cross-cutting issues at the interface of EU agricultural and environmental policies

Dear Sir and Madam,

On behalf of #HodowcyRazem (8 largest organizations representing Polish animal production sector), as well as other organisations operating across the Polish agri-food supply chain, we hereby submit our position and comments concerning cross-cutting issues at the intersection of EU agricultural and environmental policies.

This letter is jointly addressed to the Directorate-General for Agriculture and Rural Development (DG AGRI) and the Directorate-General for Environment (DG ENV), as the matters raised fall within the remit of both Directorates and require a coordinated and coherent regulatory approach.

We wish to draw the attention of the European Commission to the growing problem of cumulative regulatory burdens resulting from the simultaneous implementation of several major policy instruments, including the CSRD Directive, the EUDR Regulation, the revised IED Directive, as well as further animal welfare-related regulations.

While the objectives of these acts – notably environmental protection, climate action and animal welfare – are understandable, their current design and implementation increasingly deviate from the principles of reliable and proportionate legislation to which the European Union has committed itself in its Treaties and under the Better Regulation framework.

Our remarks intent to contribute to a constructive dialogue with EU institutions and stakeholders, with a view to supporting solutions that effectively reconcile environmental and climate objectives with the economic viability, competitiveness and resilience of EU agriculture, as well as long-term food security.

1. Lack of thorough ex-ante analysis and the problem of reactive measures

Recent years' practice points to a **systematic departure from comprehensive ex ante analysis of regulatory effects**, especially in the areas of:

- redistribution of costs throughout the supply chain,
- identification of entities bearing the regulatory costs,
- assessment of cumulative burdens.



As a result, analyses are conducted **only ex-post**, when the regulations are already in force and generate serious economic and social tensions. The establishment of the **Agrifood Chain Observatory (AFCO)** in 2024 and the **European Board on Agriculture and Food (EBAF)** in 2025 should be seen as **remedial measures**, confirming that appropriate analytical mechanisms did not work at the legislative stage.

2. Effects on the achievement of CAP objectives (Art. 39 TFEU)

According to Art. 39 TFEU, the Common Agricultural Policy is to ensure, among others:

- increase in agricultural productivity,
- decent standard of living for the rural population,
- market stability,
- supply security and reasonable prices for consumers.

Meanwhile, **the cumulative effects of CSRD, EUDR, IED and welfare regulations** lead to a situation where:

- farmers and SMEs bear regulatory costs that cannot be passed down the chain,
- the risk of selling below production costs increases,
- there is growing pressure to relocate production outside the EU (production/carbon leakage).

Such effects are clearly contrary to the CAP objectives and undermine the Union's food security.

3. The principle of proportionality and subsidiarity (Art. 5 TEU)

The lack of reliable analysis of cumulative effects and the failure to consider structural differences between Member States (agrarian model, average farm size, natural conditions) results in a **violation of the principle of proportionality**.

According to established CJEU case law, EU measures must be **adequate and necessary** to achieve intended objectives. In its current form, many reporting and operational obligations, especially under CSRD and EUDR— **go beyond what is necessary**, particularly for the weakest links in the supply chain.

4. Dysfunction of Better Regulation and RSB mechanisms

According to the 2016 Interinstitutional Agreement and the *Better Regulation* guidelines (SWD (2016)305), the EU legislative process should be based on evidence and analysis of real-world impacts.

Meanwhile:

- **Regulatory Scrutiny Board**, despite the strengthening of its mandate in 2022, has not prevented the adoption of regulations of low analytical quality,
- the issue of **cumulative burdens** remains marginalized,

- The Commission is forced to subsequent corrections (e.g. the announced reduction of reporting obligations by 25%).

5. Rural proofing – the need for a mandatory mechanism

Experience to date shows that the **rural proofing** mechanism is too weak and insufficiently embedded in the legislative process. As a result, horizontal policies, including climate and ESG, **disproportionately burden rural areas**.

Every regulation concerning ESG, climate or welfare should undergo a **mandatory "rural filter" already at the Inception Impact Assessment stage**, not only in response to crises and social protests.

6. Conclusions and demands

We call on the European Commission to:

1. **Introduce and systematize ex ante analyses**, covering the entire supply chain and cumulative burdens of CSRD, EUDR, IED and welfare regulations.
2. **Genuinely consider cost redistribution** and identify entities bearing the regulatory burden.
3. **Make rural proofing a mandatory mechanism**, not an optional one.
4. **Ensure future regulations comply with Art. 39 TFEU**, regarding farmers' incomes and supply security.
5. **Return to evidence-based policy-making** as the foundation for Green Deal changes.

The European Union today faces a crisis of confidence in the quality of its own law. Without restoring integrity, predictability, and proactive analysis of real-world impacts, further implementation of Green Deal changes may permanently weaken the competitiveness of European agriculture and the agri-food industry.

Yours faithfully,

Signature **#HodowcyRazem**

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#HodowcyRazem to inicjatywa 8 największych polskich organizacji zrzeszających krajowych hodowców, której celem jest zrównoważony rozwój produkcji zwierzęcej oraz przekazanie społeczeństwu, mediom, przedstawicielom świata polityki racji i argumentów hodowców i naukowców. Pokazujemy, że chów zwierząt prowadzony jest w oparciu o dobre praktyki, z dbałością o dobrostan zwierząt, a produkty tego chowu są zdrowe i stanowią niezbędny składnik ludzkiej diety.