



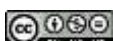
ISSN: 2036-5438

Sustainable Agri-Food Systems, Climate Change and CAP Strategic Plans in the ambitious pathways of the EU after the Green Deal

by

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Perspectives on Federalism, Vol. 12, issue 1, 2020





Abstract

In December 2019 the EU Commission presented the European Green Deal as directly connected with the Commission's strategy to implement the United Nation's 2030 Agenda. More recently, the Communication from the Commission of 20 May 2020 on the Farm to Fork Strategy strengthened further the efforts for building a fair, healthy and environmentally-friendly food system. The EU Common Agricultural Policy (CAP) 2021-2027 is intended to play a key supporting role for climate change mitigation and adaptation of agriculture as well as environmental protection. The paper considers how the recent communications of the EU Commission address the issue of sustainable farming and food system against climate vulnerability while ensuring food security. It evaluates the relationships among the EU sustainable development strategy, the revised CAP and the EU transition pathways to climate resilience.

Keywords

sustainable development; climate policy; common agricultural policy (CAP); Green Deal; National Strategic Plans



1. Introduction

Sustainable development is enshrined in the European Union treaties, being at the heart of the European policy for a long time (McMahon 2015). However, many critics have been raised regarding the lack of a coherent and comprehensive strategy in implementing Sustainable Development Goals (SDGs) at the EU level, in the more than five years that have passed since the adoption of the SDGs.^I Even if limited, the intervention of the EU has been shaped by the common efforts of reaching the ambitious goals set by the 2030 Agenda for Sustainable Development, adopted by the UN General Assembly on 25 September 2015.^{II} By 2030, the European Union shall, *inter alia*, implement resilient agricultural practices that increase productivity and production - under Goal 2; integrate climate change measures into national policies, strategies and planning, strengthen institutional capacity on climate change mitigation, adaptation, impact reduction and early warning – under Goal 13; protect, restore and promote sustainable use of terrestrial ecosystems – under Goal 15.^{III} Within these goals, the UN Environment Assembly of the United Nations Environment Programme encourages to pursue synergies and co-benefits among different policy areas (e.g. climate change, agriculture, food, water, energy access) and to take advantage of the resulting synergistic effects.^{IV}

While sustainable development involves multifaceted perspectives, climate change has been identified as one of the new threats for the achievement of SDGs according to the 2019 High-level Political Forum (HLPF) that concluded in July last year.^V Climate change, agriculture and food are interrelated in many ways on multiple scales: agriculture both contributes to and is affected by climate change (Angelo et al. 2017; Adler 2013). Once the novelist Wendell Berry said that ‘eating is an agricultural act’ in describing the importance of understanding the connection between eating and the land (Berry 1990). Food security and safety are particularly affected by climate change. As recent studies suggest, climate change would influence both the nutrient intakes of food, due to a ‘great nutrient collapse’ caused by increasing carbon dioxide in the atmosphere, and its safety (Alabrese 2019a; Fanzo et al. 2018). Furthermore, the loss of crop varieties due to the adverse effects of climate change could affect the cultural dimension of food security (Mbow et al. 2019). On the other hand, agriculture is an important contributor to climate change. As farming activities directly depend on climatic conditions, changing in the rainfall and temperature



patterns, and extreme events such as droughts and heatwaves drive farmers to increase their use of pesticides and fertilizers, thus increasing the potential for pollution and adverse impact on human health. The EU policy framework recognises a set of measures to mitigate its impact, i.e. agronomic measures (aiming at reducing the need for nitrogen fertilisers), livestock measures (closed storage of manure, improved application of manure and urea fertiliser, improved livestock feeding strategies so that animals produce less ammonia-rich manure, as well as anaerobic digestion for large farms), or energy measures (such as developing photovoltaic installations or reducing fuel consumption).^{VI}

Within this context, the EU Common Agricultural Policy (CAP) instruments will play a key supporting role for climate change mitigation and adaptation as well as environmental protection (Vanham 2020) – with an expected 40% of the CAP overall budget for 2021 to 2027 that will contribute to climate action. In December 2019, the EU Commission presented the European Green Deal as directly connected with the Commission’s strategy to implement the United Nation’s 2030 Agenda.^{VII} More recently, the Communication from the Commission of 20 May 2020 on the Farm to Fork Strategy is aimed at strengthening further the efforts for building a fair, healthy and environmentally-friendly food system.^{VIII}

The paper will investigate how the recent communications of the European Commission address the issue of the sustainability of the farming and food system against climate vulnerability while ensuring food security. First the article provides an analysis of the strategic agenda for the farming and food system as set out in the European Green Deal. It then explores the main connections between the efforts to tackle climate change, protect the environment and preserve biodiversity, recognised in the Farm to Fork Strategy. Lastly, it reflects on the proposal of the European Parliament and the Council for a new regulation on support for strategic plans under the Common agricultural policy and financed by the European Agricultural Guarantee Fund and by the European Agricultural Fund for Rural Development. In conclusion, the article will evaluate the relationships among the EU sustainable development strategy, the current and future Common Agricultural Policy and the EU transition pathways to climate resilience, thus distilling what can be learned on the state of policy coherence.



2. The European Green Deal: climate change is *this generation's defining task*

In December 2019, the EU Commission presented the European Green Deal as ‘a new growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient and competitive’. The issue is directly connected with the Commission’s strategy to implement the United Nation’s 2030 Agenda and the priorities announced in President von der Leyen’s political guidelines.^{IX} In the Commission’s view, the European Green Deal is aimed at providing a roadmap for making the EU's economy more sustainable, where there are no net emissions of greenhouse gases by 2050 and economic growth is decoupled from resource use. The roadmap is understood as a *living* document that will be updating as needs are progressively defined and context evolves within a feedback and feedforward loop. This designs the course of action to strengthening the efficient use of resources by transitioning to a clean and circular economy as well as cutting pollution. The Green Deal thus outlines investments needed and financing tools available to turn climate and environmental challenges into opportunities, reaffirming the collective responsibility of the European Union to sustainable development while ensuring a just and inclusive transition. An increasing number of scholars are discussing the economic impact of the Green Deal in different sectors, considering *inter alia* the issue through a cost opportunity perspective and how to design economic incentives to support the implementation of the Green Deal (Camilleri 2020; Streimikis et al. 2020; Pellegrini- Masini et al. 2020).

According to the Commission’s view, there is a need to rethink policies to deliver the Green Deal and establish intense coordination to unlock synergies across policy areas. The agricultural and food sector is considered crucial to manage the transition. In this framework, the Common Agricultural Policy (CAP) will remain a key supporting tool, according to the Commission. To achieve these goals, the EU needs to ‘consider the potential role of new innovative techniques to improve the sustainability of the food system, while ensuring that they are safe’. The policy implications for farming and food systems that rise from the future implementation of the European Green Deal deserves a broader investigation (Davies 2020). In particular, the Commission in its Communication stated that “pro-active re-skilling and upskilling are necessary to reap the benefits of the



ecological transition”. This crucial aspect has been more recently emphasised in the Commission’s Communication on New Skills Agenda on sustainable competitiveness, social fairness and resilience, in July 2020.^x

The EU policy has already instilled awareness on the interlinks and mutually reinforcing nature of the policy areas of protecting and restoring natural ecosystems, of the sustainable use of resources and improving human health (Persson et al. 2018). The European Green Deal strengthens further this approach and provides that this is ‘where transformational change is most needed and potentially most beneficial for the EU economy, society and natural environment’. For taking advantage of potential trade-offs between economic, environmental and social objectives, the Commission envisages that future policy will need to make use of all levers: regulation and standardisation, investment and innovation, national reforms, dialogue with social partners and international cooperation (Duncan et al. 2020).

According to the Commission’s view, the revised Common Agricultural Policy (CAP) will provide the opportunity to reflect the ambition of the Green Deal and the Farm to Fork Strategy. The Commission maintains to assess each Member State commitments against strong climate and environmental criteria, following the perspective that national actions should lead to the use of sustainable practices within the focus shifted from compliance to performance. The Commission started to outline some areas of intervention for improved environmental and climate performance for the programming period 2021-2027 of the CAP: the use and risk of chemical pesticides as well as the use of fertilisers and antibiotics, the increase of area under organic farming and the potential role of new innovative techniques to improve the sustainability of the food system.

3. The Farm to Fork Strategy of the EU Commission

While the European Green Deal provides a commitment to make Europe the first climate-neutral continent by 2050, the Farm to Fork Strategy is placed at the heart of the challenge of sustainable food systems and addresses comprehensively the links between ‘healthy people, healthy societies and a healthy planet’. Food systems is one of the key drivers of climate change and environmental degradation in Europe. The European Union



is thus addressing the challenge of reducing its environmental and climate footprint, while managing the dependency on pesticides and antimicrobials, reducing excess fertilisation and reversing biodiversity loss.^{XI} The approach adopted by the Commission is systemic and involve all citizens and business operators across farming and food value chains. The Strategy takes into account the impact of the current COVID-19 pandemic and the economic downturn in planning the transition to a fair, healthy and environmentally-friendly food system (Elkerbout et al. 2020). Following the line already established in the Green Deal, such a shift is understood as an opportunity to offer economic gains while the recovery from the crisis may put all Member states into a sustainable path. In this view, the COVID-19 pandemic is emphasised as a case in point to underline the urgency of building robust and resilient food system (Colli 2020). To achieve this goal, the Strategy provides a roadmap to reduce dependency on pesticides and antimicrobials, reduce excess fertilisation, increase organic farming as well as improve animal welfare, and reverse biodiversity loss. The actions to address all these challenges need to be based on the awareness of the interrelations ‘between our health, ecosystems, supply chains, consumption patterns and planetary boundaries’, in the Commission’s view. While the Climate Law sets out the objective for a climate neutral Union in 2050,^{XII} the policy and legislative roadmap designed by the Strategy is aimed at ensuring that agriculture, fisheries as well as aquaculture and the food value chain play their role in this process.^{XIII}

The Strategy recognises the importance of the Common Agricultural Policy in supporting the transition to a more sustainable farming and food system that is focused on the Green Deal. The Commission recognises that the capacity of the Member States in enabling the transaction will need to be duly assessed and monitored through the implementation. The role of the Commission will be key in providing recommendations to Member States on addressing the Green Deal targets and the goals stemming from the Farm to Fork Strategy. Member States will be required to set explicit national values for the targets, considering their specific situation and the provided recommendations.

To accelerate the transition, a legislative proposal establishing a common framework for a sustainable food system has been planned before the end of 2023, as provided in the action plan of the Farm to Form Strategy. According to the Commission, this proposal will be aimed at enhancing policy coherence as well as mainstreaming sustainability in food-related policies at the European and national level. Such a common policy framework will



provide comprehensive definition and general principles for sustainable and resilient food systems, addressing also the responsibilities of all chain actors.

4. The current proposal for the National Strategic Plans under the CAP 2021-2027

On June 2018, the proposal for a regulation on support for national strategic plans has been presented under the Common Agricultural Policy (CAP) for the programming period 2021-2027 and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD).^{xiv} The National Strategic Plan is recognised as a national planning tool that unifies in a single programming and management document the agricultural policies of each Member States, i.e. direct payments, sectoral interventions of the Common Market Organizations (CMO), the measure of rural development support and the State aid schemes. This will imply integrating the first and second pillars of the CAP that so far has been established separately and funded respectively by the EAGF and EAFRD.

In this framework, the national administration is considered as the only interlocutor of the European Commission in the negotiation that follows the proposal of the National Strategic Plan. According to article 92 of the proposed Regulation, Member State shall establish in the CAP Strategic Plans an intervention strategy in which quantitative targets and milestones shall be set to achieve the specific objectives,^{xv} provided under Article 6.^{xvi} Each Member State shall establish a single CAP Strategic Plan for its entire territory; however, the Regulation admits that elements of the CAP Strategic Plan can be established at regional level. Member States have to ensure the coherence and the consistency with the elements of the CAP Strategic Plan established at national and eventually at regional level, according to Article 93. They will draw up their Strategic Plans taking in duly account relevant regional and local authorities, and they are required to organise a partnership that includes at least relevant public authorities, economic and social partners, and relevant bodies representing civil society. In particular, relevant national authorities for environment issues have to be effectively involved in the preparation of the environmental and climate actions. A vast literature has explored the role of public authorities and private stakeholders



in implementing the European Green Deal (Camilleri 2020; Heyl et al. 2020; Bocken et al. 2019; Ranta et al. 2018).

Through the National Strategic Plans, a new approach has been affirming in the CAP implementation that is based on a different division of tasks between the European Commission and the Member States and aimed at providing a greater decision-making autonomy regarding the ways of implementing policies (Mantino 2019). The European Commission defines – based on general and specific objectives set by article 5 and 6 of the Regulation - what is the minimum baseline in implementing the policies and the related indicators to measure their performance in terms of results and impacts. The previous programming periods provided a detailed definition of common rules regarding the application of individual measures; now, the revised CAP provides to the Member States the opportunity to adapt policies to their needs. This is not only in relation to rural development measures, but also to the measures under the first pillar of the CAP. However, it emerges a shift in the responsibility that is transferred from the European Commission to the Member States. In this framework, the Commission evaluates the Plan presented by each Member State and approves it whether it is internally consistent with the baseline and all the objectives are adequately quantified (Erjavec et al. 2018). Implementation would be monitored and assessed against expected objectives and results, rather than financial reporting. In the Commission's view, Strategic Plans will also provide a needed simplification in the architecture of the reporting system under the CAP. It will allow to change from the current 28 notifications for direct payments, 118 Rural Development Programmes, 65 sectoral strategies under the CMO to 27 National Strategic Plans.

The CAP Strategic Plans leaves room for many questions that have to be clarified in order to move on to its implementation and to exploit its role in supporting the transition envisaged in the Green Deal and the Farm to Fork Strategy: how to integrate the different parts of the CAP (direct payments, sectoral interventions through CMO, rural development measures) into a coherent strategy? what new challenges will national institutional bodies face after the approval of the National Strategic Plan in terms of coordination, management and control?

Some critical points have been already discussed by the European Court of Auditors in its Briefing Paper on March 2018.^{XVII} The Court highlighted *inter alia* the lack of clear,



specific and quantifiable objectives and targets as well as the weakness of the links between types of intervention and objectives, such as between direct payments and food security. Moreover, the Court also observed the absence of transparent criteria that the Commission uses for assessing the content and quality of the National Strategic Plan. This last point is considered particularly problematic as it may not allow a consistent assessment of the Plans and may tend to be based on criteria established time to time by the specific desk officers for the Member States (Mantino 2019). This may also result in a scenario where different levels of ambition correspond to different administrative, analytical and strategic capacities of national authorities. While it may be true that flexibility allows Member States to decline the CAP according to their ambitions, it is equally true that some administrations have the ability to think and manage more complex actions better than others that do not have the same capacity (Pupo D'Andrea 2019). Furthermore, different approach on climate and environmental issues at national level could lead to different levels of ambition, and also substantially diverging from the level of commitments required by the Green Deal. Such concerns are strengthened by the consideration that such a new approach is based on instruments that remain substantially unchanged from the current programming period (Pupo D'Andrea 2019).^{xviii}

Whatever the scenario, many countries have already started a series of preparatory activities and *ex ante* analysis. The Strategic Plan may enhance a scenario analysis based on a more *macro* perspective that focuses on the current evolution of farming and food system and understand how to allocate resources between the two pillars and between the different measures as well as to provide a further coordination that can follow the ambition of the Green Deal and the Farm to Fork Strategy as envisaged by the EU Commission. A similar activity should start at the national level with the involvement of the various stakeholders of the national and regional partnership.

5. Concluding remarks

The entry into force of the new Common Agricultural Policy in the European Union may provide room for analysing further its impact and potential for contributing to the achievement of Sustainable Development Goals, thanks also to the change in the



institutional set-up as a result of the EU election in May 2019. The ambitious policy pathway - undertaken by the EU Commission with the Communication on the *European Green Deal* and the more recently *Farm to Fork Strategy* – will need to be explored further in establishing the Common Agricultural Policy for the programming period 2021-2027.

One could argue that through the National Strategic Plan a new approach is introduced in the CAP implementation. Member States have a greater decision-making autonomy regarding the ways of implementing policies and designing intervention on the basis of the baseline provided by the European Union. This may accelerate and facilitate for the Member States to take up the challenge of building a national planning tool that contributes to making the EU's economy more sustainable and building a fair, healthy and environmentally-friendly food system. However, many critical points are emerging. In particular, the lack of clear, specific and quantifiable objectives and the weakness of the links between types of intervention may result in a scenario where different levels of ambition correspond to different administrative, analytical and strategic capacities of national authorities. Moreover, different national awareness on climate and environmental issues may acquire an expected relevance. This new approach has suggested to some commentators that it may represent a first step in the renationalisation of the Common Agricultural Policy (Pupo D'Andrea 2019).

It is arguable that the ambitious action plan of the EU Commission envisaged in the Green Deal and the Farm to Fork Strategy will play a central role in the following months and years for ensuring that Strategic Plans are based on robust climate and environmental criteria. Given that the start of the revised Common Agricultural Policy is expected at the beginning of 2022, the Commission committed to closely work with the Member States and stakeholders to ensure that from the first draft the national strategic plans fully reflect the ambition of the Green Deal and the Farm to Fork Strategy.

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^I *Reflection Paper: Towards a Sustainable Europe By 2030*, European Commission, COM(2019)22 of 30 January 2019

^{II} *Transforming our World: the 2030 Agenda for Sustainable Development*, adopted by the UN General Assembly Resolution, 25 September 2015, A/RES/70/1

^{III} *Sustainable development in the European Union. Monitoring report on progress towards the SDGs in an EU context*, Eurostat, Statistical Books Collection, 2020

^{IV} *Delivering on the Environmental Dimension of the 2030 Agenda for Sustainable Development*, Information Note of the Executive Director, United Nations Environment Assembly of the United Nations Environment



Programme, UNEP/EA.2/INF/4

^v *Report of the high-level political forum on sustainable development convened under the auspices of the Economic and Social Council at its 2019 session*, High-level political forum on sustainable development, E/HLPF/2019/7

^{vi} European Commission, *Evaluation study of the impact of the CAP on climate change and greenhouse gas emissions*, Publications Office of the European Union, 2019

^{vii} *The European Green Deal*, Communication from the European Commission, COM(2019) 640 final

^{viii} *A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system*, Communication from the European Commission, COM(2020) 381 final

^{ix} Ursula von der Leyen, *A Union that strives for more. My agenda for Europe: political guidelines for the next European Commission 2019-2024*, available at <https://op.europa.eu/en/publication-detail/-/publication/43a17056-ebf1-11e9-9c4e-01aa75ed71a1>

^x *European Skills Agenda for sustainable competitiveness, social fairness and resilience*, Communication from the European Commission, COM(2020) 274 final. This novel Skills Agenda is based on the Skills Agenda adopted in 2016 and aimed at unlocking the potential of the Recovery Plan for Europe. See also *A New Skills Agenda for Europe. Working together to strengthen human capital, employability and competitiveness*, Communication from the European Commission, COM(2016) 381 final.

^{xi} See also *Biodiversity Strategy for 2030 Bringing nature back into our lives*, Communication from the Commission, COM/2020/380 final. In the Commission's view, biodiversity is crucial for ensuring EU and global food security. To support the long-term sustainability of food systems and 'bringing nature back to agricultural land', this Strategy is intended to work synergistically with the Farm to Fork Strategy and the Common Agricultural Policy (CAP) 2021-2027.

^{xii} Proposal for a Regulation of the European Parliament and of the Council establishing the framework for achieving climate neutrality and amending Regulation (EU) 2018/1999 (European Climate Law), COM(2020) 80 final

^{xiii} See Annex to *A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system*, Communication from the European Commission, COM(2020) 381 final

^{xiv} Proposal for a Regulation of the European Parliament and of the Council establishing rules on support for strategic plans to be drawn up by Member States under the Common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulation (EU) No 1305/2013 of the European Parliament and of the Council and Regulation (EU) No 1307/2013 of the European Parliament and of the Council, COM(2018) 392 final

^{xv} Under article 3, the proposed Regulation provides a clear definition of *targets* as 'pre-agreed values to be achieved at the end of the period in relation to the result indicators included under a specific objective', and *milestones* as 'intermediate targets to be achieved at a given point in time during the CAP Strategic Plan period in relation to the indicators included under a specific objective'.

^{xvi} Article 6 provides that the achievement of the general objectives needs to be pursued through the following specific objectives: '(a) support viable farm income and resilience across the Union to enhance food security; (b) enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation; (c) improve the farmers' position in the value chain; (d) contribute to climate change mitigation and adaptation, as well as sustainable energy; (e) foster sustainable development and efficient management of natural resources such as water, soil and air; (f) contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes; (g) attract young farmers and facilitate business development in rural areas; (h) promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry; (i) improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare'.

^{xvii} European Court of Auditors (2018), *Future of the Cap*, Briefing Paper, March 2018

^{xviii} While direct payments changed in their operation, their typology and the overall structure remains unchanged, with the only exception being the elimination of green payments.



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