POLICY BRIEFING

Supporting a systemic transition for the livestock and protein sectors:

A critical review of the Livestock Strategy and the Protein Action Plan

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Introduction

The EU Livestock Strategy (LS) and Protein Action Plan (PAP), published in July 2026, mark a first attempt by the European Commission to present a coherent vision for the future of livestock and protein production in the EU. Both initiatives are framed around strengthening the sector's resilience, competitiveness, and contributing to food security, while reducing strategic dependencies on imported protein feed.

The documents present a diagnosis of the main challenges that both sectors are currently facing. The livestock strategy points to profitability, market volatility and exposure to animal disease, alongside increased societal expectations on animal welfare. It also acknowledges that livestock in the EU are a major source of agricultural greenhouse gas emissions, ammonia and nutrient pollution, and that the pace of decline in emissions has been slow. It recognises that the long-term viability of the livestock sector depends on addressing environmental and climate pressures. The Protein Action Plan, on the other hand, highlights the EU's dependence on imported high-protein feed, which threatens the strategic autonomy of the livestock sector and the agri-food system as a whole.

To address these challenges, the documents set out several initiatives and objectives, which are presented as mutually reinforcing. In this perspective, the announcement of the revision of animal welfare legislation for laying hens and broilers, and subsequently for pigs, is welcome, as is the commitment to improve on-farm emissions monitoring and to strengthen risk management tools. Likewise, the Protein Action Plan rightly aims to scale up the production of legumes and other protein crops, which can help reduce fertiliser dependence, increase farm resilience, and improve soil health. And it includes measures to strengthen the value chain, addressing some of the key barriers identified in a recent IEEP report[1], notably those around aggregation, processing infrastructure, and collective organisation.

The question is whether, taken together, these initiatives amount to the systemic policy transition the sector needs. While the documents contain commitments on protein diversification, climate and environment, the tension at their core – between protecting current livestock production levels and pursuing strategic autonomy on one side and meeting environmental objectives on the other– is not fully confronted. It surfaces most clearly around the issue of extensification of livestock systems. Both documents encourage extensification while also committing to halt the decline in production and to accelerate market penetration at home and abroad. Extensive systems yield less per animal and per hectare, so the two reconcile only if production falls – and production can fall without displacing GHG emissions and increasing imports only if demand falls with it. If demand remains unchanged, a reduction in livestock herds would require additional land. On the contrary, a reduction in demand for animal-based products would deliver the absolute reductions the climate targets require, release land and cut dependency on imported feed, making strategic autonomy achievable; yet it is the one lever neither document addresses directly.

[1] Szewczyk, O. and Nadeu, E. (2026) 'Protein Diversification: Closing the Economic Confidence Gap. Strengthening Supply Chain Structures for Food-Grade Legume Production in Europe. Report, Institute for European Environmental Policy, Brussels

Critical review of the Livestock Strategy and the Protein Action Plan

The publication of these strategic documents underlines the key relevance of the livestock and protein sectors, at a moment when they are facing critical climate, environmental and economic challenges. Credibly addressing these, as identified in the LS and the PAP, requires a holistic transformation of the livestock sector – one that accounts for production volumes, land use, consumption patterns, and the socio-economic implications of structural change[2]. Therefore, it is of central importance that these strategic documents adopt a long-term perspective, going beyond the most immediate issues and political preoccupations, especially regarding climate and environment. Whether the two documents provide the basis for such a transformation is the question the following sections take up. The focus of this review is placed on four interrelated issues: (1) the climate and land use footprint of the livestock sector, (2) the interactions between livestock systems, land management and biodiversity, (3) achieving EU strategic autonomy, and (4) the role of consumption shifts for transforming the livestock and protein sectors.

1. The Livestock Strategy lacks a credible response to the sector's climate and land footprint

The Livestock Strategy rightly acknowledges that livestock production is a major source of GHG emissions. Enteric fermentation and manure management account for approximately 66% of EU agricultural emissions[3] – a figure that excludes emissions from feed production and the associated use of fertiliser, and therefore captures only part of livestock's climate footprint. Livestock is also the source of 59% of all methane emissions generated in the EU.[4] This matters, because methane, while short-lived in the atmosphere, has a disproportionately strong near-term warming effect.[5] Reducing it is therefore among the most effective means available of limiting temperature rise in the coming decades.[6]

The Strategy notes ongoing discussions on taking account of the biogenic nature of methane emissions as part of a short-term carbon cycle, and refers to emissions from biological food production that it describes as unavoidable and endogenic (p. 13). It stops short of endorsing a change of metric, but gestures towards a line of argument associated with GWP*[7]. However, that

[2] Scheid A, Hart K, Pasmino J, Riedel A, Tremblay L-l, Durrant L (2025) Leveraging the Common Agricultural Policy to accelerate livestock emission reductions – examples from five Member States, Ecologic Institute and IEEP

[3] European Environment Agency, *EEA greenhouse gases – data viewer*, https://www.eea.europa.eu/en/analysis/maps-and-charts/greenhouse-gases-viewer-data-viewers (accessed 28/08/2026) Calculation from 2024 inventory data (GovReg submission 2026).

[4] Ibid.

[5] IPCC (2021), *Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.* https://www.ipcc.ch/report/ar6/wg1/

[6] Ocko, I.B., Sun, T., Shindell, D., Oppenheimer, M., Hristov, A.N., Pacala, S.W., Mauzerall, D.L., Xu, Y. & Hamburg, S.P. (2021), "Acting rapidly to deploy readily available methane mitigation measures by sector can immediately slow global warming", *Environmental Research Letters* 16(5): 054042, doi:10.1088/1748-9326/abf9c8.

[7] GWP* is an alternative metric under which the warming attributed to a short-lived pollutant depends on the change in its emission rate rather than the absolute quantity emitted; on this basis, stable methane emissions register as adding no further warming. See Lynch, J., Cain, M., Pierrehumbert, R. & Allen, M. (2020), "Demonstrating GWP*: a

accounting question is resolved; it does not alter the physical case for reducing methane. Stabilising emissions at current rates holds methane's contribution to warming at its current elevated level over precisely the decades in which methane reductions could most effectively slow the pace of warming. That leaves the risk of crossing tipping points – thresholds beyond which changes such as permafrost thaw or forest dieback become self-sustaining and effectively irreversible – higher than a declining pathway would.[8]

The Strategy's response to livestock emissions rests on improved measurement and monitoring of farm-level greenhouse gas emissions (p.13), alongside genetic improvements, innovation, and technology (p.13). All these elements are important and have a role to play in the transition.

However, the available modelling suggests that the mitigation potential of technological solutions is moderate, and dependent on several key assumptions. The Commission's impact assessment for the EU 2040 target finds an abatement potential of these options in the livestock sector of around 37 Mt CO2e[9], approximately 15% of current EU emissions from enteric fermentation and manure management. The Strategy's own figure points the same way, stating that technological solutions "offer significant mitigation potential that could lead to at least a 16% decline of GHG emissions by 2040" (pp.13–14). However, at face value, a 16% decline over fifteen years is not the order of change the 2040 target implies.

These options are, also, largely specific to intensive and housed livestock systems. At the same time, both the LS and the PAP identify the benefits of extensive grazing and recommend that Member States encourage shifts to extensive livestock production systems with CAP support. Extensification, under the right conditions, is a desirable direction on several grounds, delivering benefits that technological mitigation cannot: reduced pressure on biodiversity, landscape maintenance, animal welfare, and reduced reliance on imported protein feed. Even at constant herd size, however, a shift towards extensive systems reduces the share of animals to which these technologies can be applied, and with it the mitigation potential the modelling assumes. At the same time, extensive systems produce less per animal and per hectare, so at unchanged herd numbers the shift raises emissions per unit of output.

The implication is that extensification paired with technological innovation alone will not suffice to meet the climate targets, and the remaining emissions would still need to be addressed through a combination of changes in **consumption patterns, a reduction in livestock production and reductions in food waste**. A recent IEEP report[10] reviewing existing scenarios for reducing EU agricultural GHG emissions finds that, while combining extensification and technology-based approaches can be an effective mitigation lever, none of the pathways

means of reporting warming-equivalent emissions that captures the contrasting impacts of short- and long-lived climate pollutants", *Environmental Research Letters* 15(4): 044023, doi:10.1088/1748-9326/ab6d7e. For a critique of its policy application, see Rogelj, J. & Schleussner, C.-F. (2019), "Unintentional unfairness when applying new greenhouse gas emissions metrics at country level", *Environmental Research Letters* 14(11): 114039, doi:10.1088/1748-9326/ab4928.

[8] Armstrong McKay, D.I. et al. (2022), "Exceeding 1.5°C global warming could trigger multiple climate tipping points", *Science* 377(6611): eabn7950, doi:10.1126/science.abn7950

[9] European Commission (2024) Impact Assessment Report, Part 3, accompanying the Communication "Securing our future: Europe's 2040 climate target and path to climate neutrality by 2050 – building a sustainable, just and prosperous society", SWD(2024) 63 final, Brussels. https://ec.europa.eu/transparency/documents-register/detail?ref=SWD(2024)63&lang=en

[10] Springer, K (2025). Residual emissions in EU agriculture: Analysis of emission reduction scenarios. Policy Report. Institute for European Environmental Policy

reconcile extensification with the maintenance of output from livestock at present levels. For extensification against the current baseline to deliver a net environmental gain at EU level, overall output has to fall. Maintaining output while extensifying livestock production systems would require additional land, while reducing output without a corresponding fall in demand would displace production and emissions beyond the EU. Reduced consumption of animal products, accompanied by a reduction in the overall herd, is therefore what allows extensification to reduce environmental pressures rather than relocate them – and it is the assumption shared by the pathways in the IEEP analysis that achieve the deepest emission reductions.

By not confronting the need for structural change, including a reduction in livestock numbers, the LS and the PAP also avoid directly addressing the socio-economic implications of such change and the support mechanisms it would require. Regions economically dependent on livestock would face significant adjustments if numbers decline with no accompanying increase in the value of livestock. The Livestock Strategy calls for a transition that is "fair and balanced" and "carefully calibrated" (p.11)and gives attention to farmer wellbeing (p.17). However, it does not set out a framework for a Just Transition in the sense of managing a contraction that is already under way in parts of Europe or of supporting producers to exit or diversify out of a declining, high-emission activity. In doing so, it **defers the funding and the decisions that a Just Transition that supports relevant farmers and rural areas would require**. The Strategy, therefore, appears to prioritise a weak adaptation of the existing livestock model over the much-needed structural transformation of the sector, risking falling short of achieving the EU's climate commitments. By placing the focus on technological innovation and emissions intensity, without addressing the production levels on which absolute emission reductions depend, it avoids the much-needed discussions of the required structural changes and the support mechanisms that they would require.

2. Insufficient attention is given to land management and biodiversity when discussing extensive systems

The Livestock Strategy acknowledges that extensive grazing contributes to nature management and conservation (p.14), while also being critical to maintaining grasslands that support biodiversity, rural biotopes, conserve nature and help prevent land abandonment (p.3). In areas with high stocking densities and significant environmental pressures, extensification can contribute to reducing the pollution of water bodies, overgrazing, and ammonia emissions. Well-managed **extensification also has the potential to significantly improve animal welfare and health outcomes**.[11] Well-designed extensification systems can support the reintroduction of lower-intensity mixed farming systems, improve nutrient cycling and enhance landscape diversity. Linking extensification to organic farming or other certified systems can also provide significant environmental gains.

However, extensive livestock systems per se do not automatically deliver positive environmental outcomes. The benefits of extensification depend on how it is implemented and managed and on whether the environmental requirements are clearly defined. Without appropriate planning

[11] Godfroy, A and Muro, M (2025) Improving animal welfare through the Common Agricultural Policy, Report, Institute for European Environmental Policy

and management, it can lead to unintended consequences such as undergrazing, failure to maintain meadows or the gradual loss of species-rich grasslands that depend on specific grazing or mowing regimes. Here, the Strategy misses an opportunity to emphasise the importance of preserving existing High Nature Value (HNV) livestock systems. These are regionally diverse but in many cases generating low economic returns and at risk of further marginalisation or abandonment, facing further decline without targeted policy support.

The LS and the PAP argue that livestock contribute to the vitality of rural areas and communities, helping to prevent land abandonment (p.16). The emphasis on rural revitalisation is well placed, and the Livestock Strategy is right to identify local infrastructure – such as low-capacity and mobile slaughterhouses, cutting and cold storage, local markets – as a condition for keeping these systems viable (p.17). However, it could also be questioned whether supporting rural areas requires maintaining current livestock production levels, and, linked to that, what the contribution of other economic activities (e.g. agroecological farming, carbon farming, protein crop production, bioeconomy activities) could be for these areas currently dependent on livestock production.

Despite recognising the value of extensive grazing systems, the Strategy remains largely silent on how such systems should be supported in practice, beyond a general reference to the future CAP. It also avoids acknowledging that extensification will, in many cases, require a local reduction of livestock numbers in regions with excessive stocking densities. Positive environmental and biodiversity outcomes of extensive livestock systems depend on appropriate livestock stocking densities alongside carefully tailored management regimes. Therefore, while some redistribution towards mixed farming systems may be possible and welcome, extensification should be linked with careful management practices, targeted advice and an overall reduction in livestock numbers to ensure that it doesn't lead to unsustainable land use and increased GHG emissions, but instead delivers on the intended objectives in an effective way.

In short, the LS misses an opportunity to present a coherent implementation strategy for livestock extensification that can ensure the preservation of HNV areas while avoiding negative climate and environmental trade-offs.

3. Strategic autonomy cannot be achieved solely through feed substitution

While a central objective of both the Livestock Strategy and the Protein Action Plan is the strategic autonomy of the European Union, autonomy is treated largely as a question of where feed is sourced, rather than of the natural resources, such as land and water, that producing it requires. These resources are under growing pressure both within Europe and beyond: demands on land for food, feed, biomass, renewable energy and the carbon removals and restored ecosystems that EU legislation requires are increasing, while water scarcity deepens, already affecting around 30% of EU territory in an average year,[12] with agriculture responsible for roughly

[12] EEA (2025). Water scarcity conditions in Europe, https://www.eea.europa.eu/en/analysis/indicators/use-of-freshwater-resources-in-europe-1

a third of abstraction.[13] Both Commission documents do mention water scarcity, but only as a risk to the farming sector, rather than as a resource constraint that feed production itself plays a role in shaping. This is a significant omission given that 66% of the EU's arable land is used for feed production.[14] In addition, land overseas is also used to produce a variety of feed, later sold in the EU, which contributes to several EU countries being "net importers of land".[15] As a result, **discussions on protein autonomy cannot be separated from the broader question of the use of land and other natural resources within the EU.**

The PAP does register the constraint related to land use. It notes that greater protein production in the EU might have significant implications for land use in the context of imports (p.18) and that replacing imported high-protein feed with EU alternatives "would be very challenging, in particular in terms of area needed for cultivation" (p.5). However, while setting a concrete supply-side commitment to increasing the share of domestic consumption of feed protein from oilseed and protein crops that originates in the EU, from 25.8% in 2025 to 35% in 2035 (p.21), it does not resolve this underlying tension. **The target ratio could be achieved by various combinations of either raised EU-origin supply or reduced total feed demand – but the PAP pursues only the first of these.** Increasing domestic protein crop production is desirable other things being equal, but the plan does not quantify the arable area this would require or what kinds of production it would displace.[16]

The resources at stake in planning future protein equations extend beyond land.[17] For instance, a meta-analysis of 164 life cycle analyses found that plant-based foods had the lowest environmental impact on every indicator examined, while ruminant meat had impacts 20 to 100 times higher per kilocalorie, across land-use, GHG emissions, eutrophication, acidification, and energy use. [18] This reflects the feed-to-food conversion losses, also acknowledged in the PAP, which underlines the different conversion rates across different livestock species (p.7), but this recognition remains without corresponding policy measures.

Given the scale of the land footprint of livestock production, both within and outside the EU, supply-side objectives on their own will not deliver autonomy. The Commission's own analysis points the same way: the JRC's modelling of increased coupled income support for protein crops, the principal instrument the PAP relies on for future policy, shows limited impact on production and demand at aggregate EU level in recent years, with dietary change and livestock density limits emerging as the main drivers.[19]

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[13] EEA (2025). *Water abstraction by source and economic sector in Europe*, https://www.eea.europa.eu/en/analysis/indicators/water-abstraction-by-source-and

[14] European Commission, DG AGRI (2026) Protein supply and demand, factsheet, https://agriculture.ec.europa.eu/farming/crops/cereals/reducing-plant-protein-deficit-eu_en

[15] For instance, Italy and the Netherlands import food from an area greater than their entire domestic agricultural area. https://green-alliance.org.uk/wp-content/uploads/2024/01/A-new-land-dividend-methodology.pdf

[16] If the eventual integration of Ukraine could have a significant effect on available land in the EU, this objective should increase the competition for land in the EU

[17] Muro, M. and van Vugt, T., 2025, From Farm to Fork: Policy actions for sustainable and healthy EU diets, Institute for European Environmental Policy

[18] Clark, M. and Tilman, D. (2017) 'Comparative analysis of environmental impacts of agricultural production systems, agricultural input efficiency, and food choice', *Environmental Research Letters*, 12(6), 064016. https://doi.org/10.1088/1748-9326/aa6cd5

[19] JRC (2024), Closing the EU protein gap – drivers, synergies and trade-offs, https://dx.doi.org/10.2760/84255

Consequently, a strategy of tailored measures to increase the share of production and consumption of plant-based proteins compatible with environmental and market conditions in Europe, while reducing reliance on animal-based production, could increase land use efficiency. It would reduce the need for land used overseas to produce feed for European livestock and reinforce the strategic autonomy of the EU. From this perspective, strategic autonomy cannot be achieved without a comprehensive approach that addresses both the supply and demand sides (see shortcoming 4 below).

That being said, increasing domestic production of appropriate protein crops remains an important objective. Several key barriers are still preventing farmers from further diversifying into food-grade legume production. These are often less related to agronomic feasibility, although for some crops this may still be a limitation[20], than to **the weaknesses throughout the supply chain, from insufficient aggregation and post-harvest infrastructure to lack of market transparency and contractual insecurity**.[21] The Protein Action Plan recognises many of these structural barriers and proposes measures to strengthen value chains and create new opportunities for investment, including a dedicated protein crop sector under the CAP post-2027, mandatory recognition of producer and interbranch organisations, and required sectoral interventions (pp.13–14). There is less emphasis on the need for improved soil and water management and a broader shift to more sustainable agriculture in Europe within which a strategy for protein needs to fit. The link with policies to support a wider transition needs to be made. The present Commission proposals for the post 2027 CAP are a missed opportunity to do so and are likely to lead to a reduction in environmental expenditure in the Member States over a key period.[22]

4. The absence of proposals for meaningful action on consumption patterns

As stated in the previous sections, the extensification of livestock systems and a potential reduction in livestock numbers can only be sustainable – from an environmental, economic and social point of view – **if accompanied by changes in consumption patterns**. Without a reduction of animal-based product consumption in Europe, these measures would lead to carbon leakage and increased imports of animal-based products, a concern that is acknowledged in both documents (LS, p.13; PAP, p.7). This highlights the need for a coherent and systemic approach that addresses both production and consumption issues.

The question of dietary change is mentioned both in the Livestock Strategy and the Protein Action Plan. The Protein Action Plan underlines that the share of animal protein in the diets of Europeans increased over the last decade, to the detriment of plant protein (p.7). Against this trend, the plan mentions "*diversified diets that include meat from livestock raised on locally adapted feed*

[20] Van Vugt, T. and Nadeu, E. (2025) European Protein Diversification. Growing opportunities for farmers. Report. Institute for European Environmental Policy, Brussels.
[21] Szewczyk, O. and Nadeu, E. (2026) Protein Diversification: Closing the Economic Confidence Gap. Strengthening Supply Chain Structures for Food-Grade Legume Production in Europe. Report, Institute for European Environmental Policy, Brussels
[22] Hart, K. and Baldock, D. (2026) Strengthening environmental ambition in the proposal for the CAP 2028-2034. Institute for European Environmental Policy, Brussels.

resources, alongside the consumption of plant proteins" as playing a role in a transition towards a more resilient and sustainable food system (p.8). It also recognises that "*diets that have a high share of plant-based foods help to support environment and climate objectives"* (p.8). Despite this acknowledgement, diversification as the Plan understands it means adding additional plant protein to the EU diet rather than reducing animal protein: its measures aim to make plant proteins more available, more affordable and more visible, but none bears on the level of animal-product consumption.

Pricing is a key issue here. Prices that actually reflected the environmental costs of production would raise the relative cost of higher-impact foods, and the Plan itself notes that prices "*strongly influence consumer choices*" (p.20). The Plan takes up this question under the heading "*aligning pricing and taxation to reflect sustainability and resilience costs*", but the corresponding key action asks Member States only to "*consider advancing taxation policies that improve consumer access to resilient and affordable food*" (Annex, action 3.5) – a question of affordability rather than of prices reflecting true environmental cost.

This lack of strong measures is a significant shortcoming, given the evidence that achieving climate, biodiversity and land-use objectives will require coordinated changes in what we produce and consume[23] and that demand-side policies remain underutilised across the EU.[24] IEEP's review of EU climate mitigation pathways to 2050 shows that even a partial shift makes a material difference to the emissions outcome. In the Commission's own impact assessment for 2050, the pathway that assumes a change in food consumption – a gradual shift a quarter of the way towards the EAT-Lancet reference diet, which still leaves average EU meat intake at more than twice the recommended level – brings agricultural emissions to 47% below 2023 levels by 2050, against 32% in the scenarios that apply mitigation technologies while holding consumption on its current trajectory[25]. Even the largest dietary shift among the pathways assessed – a 46% reduction in meat consumption – leaves average intake around one and a half times the reference diet, while delivering emissions 59% below 2023 levels alongside mitigation technologies. This shows that even a moderate reduction in consumption of animal-based products could deliver substantial environmental and climate benefits and **facilitate sustainable livestock extensification.** There could also be significant opportunities for farmers through increased demand for higher value livestock products, nature restoration, or increased demand for legumes and other plant-based products.[26]

The limited attention given to dietary change is also **problematic from a public health perspective**. While there is some acknowledgement of the increase in protein consumption in the EU, the Protein Action Plan does not explicitly mention that the current protein consumption levels already exceed nutritional requirements in many population groups[27], and that diets high

[23] JRC (2024). Closing the EU protein gap – drivers, synergies and trade-offs
[24] Muro, M. and van Vugt, T. (2025), From Farm to Fork: Policy actions for sustainable and healthy EU diets, Policy Brief, Institute for European Environmental Policy
[25] Springer, K (2025) Residual emissions in EU agriculture: analysis of emission reduction scenarios, Policy Report, Institute for European Environmental Policy. Drawing on the Commission's impact assessment for the 2040 climate target (SWD(2024) 63 final). The LIFE scenario assumes a gradual 25% shift towards the EAT-Lancet reference diet by 2040, alongside a reduction in food waste and the implementation of Farm to Fork nutrient-loss targets.
[26] T. van Vugt and E. Nadeu (2025) European protein diversification: Growing opportunities for farmers, Report, Institute for European Environmental Policy
[27] EFSA recommends an average of 46g of daily protein per capita (EFSA 2012), while the EU intake is approximately 82g (49g of which from animal sources) (Simon et al. 2024)

in protein are associated with a number of diseases and poor health conditions[28]. Unhealthy diets are, after smoking, the leading cause of premature deaths in the EU, due to their contribution to rising rates of obesity and non-communicable diseases (NCDs). Though not all NCDs can be attributed to dietary choices, NCDs are estimated to account for at least 25% of total health spending in the EU.[29]

Achieving dietary changes will require policy interventions that make sustainable and healthy foods the appealing, affordable and easy option. Yet where the Commission documents bear directly on demand for animal products, they propose actions to sustain it: the EU promotion policy for Agricultural Products is to be used to highlight the quality and sustainability of EU livestock products "in both internal and external markets", an objective the Strategy applies explicitly to "all livestock value chains and all production models" (p. 18).

Food choices are shaped to a considerable degree by habit and cultural practice, which makes interventions aimed at altering them politically and socially challenging. The documents say little about that difficulty, leaving it largely out of the discussion of animal products. Part of this is a question of legal competence for policy interventions– taxation, for example, rests with Member States – but the EU still has a role: it can coordinate and support national efforts, and act on food environments through instruments of its own. IEEP's analysis points to a policy mix working at both levels: at EU level, revising the public procurement Directive, introducing science-based sustainability labelling extended to out-of-home consumption, and regulating the marketing of food to children across relevant platforms; complemented by incentives for Member States to introduce fiscal measures, alongside free school meals and accompanying education in primary schools.[30]

A planned reduction in the consumption of animal-based products in the EU over time would advance several of the objectives the two documents set out: lower emissions, reduced pressure on agricultural land and water[31], less dependence on imported feed protein, and the room needed for the sustainable extensification they endorse – yet neither document proposes measures that would actively support it. Overall, by promoting increased plant-protein production and consumption while leaving the consumption of animal-based products unaddressed, the Livestock Strategy and the Protein Action Plan miss an opportunity to place dietary change as a key component of a transition towards a sustainable food system.

[28] Delimaris I. (2013). Adverse Effects Associated with Protein Intake above the Recommended Dietary Allowance for Adults. *ISRN nutrition*, *2013*, 126929. https://doi.org/10.5402/2013/126929

[29] Vandenberghe, D., & Albrecht, J. (2020). The financial burden of non-communicable diseases in the European Union: a systematic review. *European journal of public health*, *30*(4), 833–839. https://doi.org/10.1093/eurpub/ckz073

[30] Muro, M. and van Vugt, T. (2025), "From Farm to Fork: Policy actions for sustainable and healthy EU diets", Policy Brief, Institute for European Environmental Policy

[31] Sanye Mengual, E. and Sala, S., 2023 Consumption Footprint and Domestic Footprint: Assessing the environmental impacts of EU consumption and production, EUR 31390 EN, Publications Office of the European Union, Luxembourg, doi:10.2760/218540, JRC128571

Concluding remarks

The PAP and LS identify a range of relevant challenges faced by both the sectors concerned (e.g. reduction in GHG emissions, dependency on imported feed, maintenance of permanent grassland), and they contain a number of constructive initiatives. However, by not confronting the competition and necessary trade-offs between objectives, the two initiatives struggle to define a coherent trajectory to guide the long-term evolution of these sectors or to place them within the wider sustainability and public health challenges.

Consequently, the hierarchy of solutions established in both documents is not designed to enable the deep transformation needed to address many of the most pressing challenges faced by this critical segment of the EU agri-food sector, whether climate mitigation, the environmental footprint of the livestock sector, pressure on land and water, or long-term viability and increased strategic autonomy. An important opportunity has been missed at a time when a longer-term perspective and appreciation of the scientific evidence is very much required.

Where the question of a reduction in livestock numbers is addressed at all, it is treated as a problem to be reversed. This is regrettable, as planned reductions would be a critical enabler for, among others, purposeful livestock extensification, improved land-use efficiency, a more autonomous EU protein balance and a reduced environmental and climate footprint of the livestock sector.

The potential benefits of dietary change and the wider requirement for transition in key parts of the EU agri-food chain also are overlooked in the Commission documents and different policy concerns given prominence. This greatly diminishes their strategic value. The goal of increased consumption of plant–based proteins and a healthier diet containing less animal-based products needs to be highlighted in EU strategies for the agri-food chain, accompanied by an intensified discussion of the policy options that would prove most effective in moving in this direction.

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