

Projectifying the CAP: Performance-Based Environmental Governance

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European agricultural landscape illustrating the diversity of farmland and environmental features shaped by agricultural and environmental policies.

Environmental ambitions have increasingly been integrated across EU policy domains. The EU's Green Deal and the legally binding European Climate Law underpin the transition towards climate neutrality and adaptation (European Commission, 2026a), with climate targets largely based on comprehensive impact assessments (European Commission, 2026b). The Common Agricultural Policy (CAP) is particularly important in this context due to its substantial financial resources, territorial reach, and influence over agricultural practices, giving it considerable potential to shape the EU's progress towards climate neutrality (European Commission, 2023).

Simultaneously, EU governance has increasingly shifted towards performance-based approaches that translate broad policy objectives into measurable results. A similar trend has been extensively examined in international development, where projectification organises interventions

around predefined objectives, temporal boundaries, administrative procedures, and results-oriented management (Börzel, 2021; Rosenschöld & Wolf, 2017; Scott, 2021). Scott (2021), for example, links projectification of Swedish development aid to broader processes of marketisation and managerialisation, making development work more measurable and administratively governable. This literature frames projectification as a mode of governance.

This perspective is particularly relevant to EU environmental policy. Where Member State implementation limits direct Union action, project funding can function as a soft policy mechanism through which EU priorities are incentivised and implemented through collaborative networks (Montes & Escobar, 2023). Yet, the organisational mechanisms that make policy measurable and manageable often operate through shorter administrative and performance cycles, while environmental objectives depend on sustained transformation over much longer timescales. The central analytical problem is therefore the temporal mismatch between the cycles through which interventions are governed and the timescales over which environmental change occurs (Scott, 2021).

The CAP's latest reform, the New Delivery Model (NDM), represents, this paper argues, an extension of this projectified, performance-based governance logic. The NDM rebalances the CAP from predominantly rule-based, compliance-oriented governance towards a greater emphasis on performance and results. It retains regulatory and financial controls while organising policy around strategic objectives, measurable indicators, decentralised implementation, and results-based monitoring.

Projectification and Performance-Based Governance

The term projectification, coined by Christophe Midler in 1995, has since been applied to public governance and development aid, where interventions are organised around temporary projects and performance-oriented structures (Montes & Escobar, 2023; Scott, 2021).

While projectified governance remains underutilised in the EU governance literature, it is consistent with the core principles of New Public Management (NPM). This paper adopts projectification because it more specifically captures how NPM principles translate into governance practices, including flexible, market-oriented management and emphasis on efficiency, transparency, and precision (Sjöblom and Godenhjelm, 2009).

The projectified logic moves governance away from top-down control towards indirect and decentralised steering: central authorities set goals and funding while implementation is delegated to national and subnational actors. Within the EU, project funding can foster competition and incentivise compliance through flexibility (Montes & Escobar, 2023), shifting attention towards predefined indicators and concrete results alongside procedural requirements (Godenhjelm, Lundin and Sjöblom, 2015). Broad policy objectives are consequently translated into discrete interventions

organised around milestones, budgets, and reporting procedures (Montes & Escobar, 2023).

The NDM & Projectification

Viewed through this lens, the CAP's NDM can be understood as a supranational manifestation of projectified governance in European agriculture. It emphasises performance and results through national strategic planning and measurable indicators, allowing Member States to translate EU-level objectives into domestic interventions through CAP Strategic Plans (CSPs). This discretion remains embedded within a common framework, as CSPs are subject to EU legislation, Commission approval, monitoring, and review (Tamas, 2026).

The projectified character of the NDM is particularly visible in its Performance Monitoring and Evaluation Framework (PMEF), which organises implementation around output, result, impact, and context indicators. Indicators such as R.6, concerning redistribution of support to smaller farms, and O.16, tracking areas under maintenance commitments for afforestation and agroforestry, provide predefined measures for assessment (European Commission, 2024). Combined with predefined objectives, targeted interventions, quantified targets, reporting cycles, and performance reviews, these features closely align with the characteristics identified in the projectification literature (Scott, 2021).

The NDM combines supranational steering with decentralised implementation: the Commission establishes objectives, rules, and performance parameters, while Member States manage CSPs. National discretion therefore operates alongside continued EU-level oversight, rather than representing a withdrawal of central control (Metta et al., 2023).

Systemic Pathologies: The Caveat

While performance-based governance offers flexibility, adaptability, and efficiency (Montes & Escobar, 2023; European Commission, 2023; ECA, 2021), its application to environmental objectives risks generating systemic pathologies at both micro and macro levels (Tallberg, 2002; Börzel, 2021).

Micro-level: Responsibilization and institutional continuity

At the micro level, performance-based governance divides labour between central authorities who “steer” through macro-targets and national and subnational actors that “row” through implementation (Godenhjelm, Lundin and Sjöblom, 2015). This can produce “responsibilization”, whereby systemic risks and structural costs associated with the environmental transition are channelled onto individual actors and Member States (Kalff, 2023). If targets are missed, failure may be framed primarily as an implementation problem rather than a limitation within policy design, creating tensions for vulnerable farmers between economic survival and environmental compliance.

While some decentralisation is necessary in diverse European agriculture, concern arises when responsibility is not accompanied by mechanisms to address structural constraints. Projectification can fragment expertise, administrative networks, and institutional memory when projects or strategic cycles end (Godenhjelm, Lundin and Sjöblom, 2015). Applied to the NDM, this raises the possibility that short performance cycles prioritise reporting outputs over institutional learning, leaving administrations to reconstruct administrative capacity across funding cycles (Tamas, 2026; Godenhjelm et al., 2015, and Munck af Rosenschöld, 2019).

Macro-level: Procedural compliance and the erosion of long-term ambition

At the macro level, projectification may generate procedural compliance: meeting quantitative benchmarks while postponing deeper transformation. Because the Commission evaluates Strategic Plans partly through predefined indicators, Member States may face incentives to optimise reporting and measurable targets rather than pursue politically difficult reforms (Godenhjelm, Lundin and Sjöblom, 2015).

A striking example is French environmental modelling, where approximately 99% of French farmers can qualify for “green” CAP payments without substantial changes to existing practices (Tamas, 2026; RAP France, 2025). This indicates a gap between formal eligibility for environmental support and behavioural change. Where existing practices already satisfy criteria, strong performance in eligibility or participation may not correspond to environmental transformation. This is difficult to reconcile with the generational timescales required for ecological restoration, climate mitigation, and carbon sequestration. The issue is therefore not that the CAP consists exclusively of short-term projects, but that long-term socio-ecological objectives are governed through comparatively short administrative and performance cycles (Montes & Escobar, 2023).

The NDM’s emphasis on subsidiarity introduces further tensions. While it facilitates context-sensitive transitions by granting Member States flexibility to tailor CSPs to local circumstances, greater decentralisation can also relocate political contestation from the EU level to the domestic arena (European Commission, 2026b). Organised agricultural interests may influence environmental targets, creating incentives for governments to moderate environmental ambitions in response to domestic political pressures (Bordin, 2024; Adshead, 1996; Tamas, 2026).

During the 2024 agricultural crisis, France exercised flexibility under GAEC 8 by partially derogating from biodiversity requirements for non-productive areas, amid substantial agricultural protests (Tamas, 2026; Bordin, 2024). This example highlights how discretion that permits adaptation can also create political space for weakened environmental requirements. A similar vulnerability appears in the European Cohesion policy, where 55% of indicators were amended or reduced prior to formal reviews (ECA, 2021). This points to yet another deficiency of results-based

frameworks: that targets may be adjusted in ways that improve measured performance without improving substantive outcomes.

Finally, projectification is often promoted as simplification, yet implementation can generate additional administrative demands. Complex indicator matrices, measurement systems, and audit requirements can make reporting burdensome (Tamas, 2026; ECA, 2021). Regulation (EU) 2025/2649 exemplifies this tension by discontinuing annual performance clearance while retaining annual reporting and multiannual monitoring, following the first year of implementation, which revealed a disproportionate administrative burden for Member States. If environmental accountability depends on measurement and monitoring, how far can performance assessments be simplified without reducing the institutional capacity to sustain attention to environmental outcomes (Irish Farmers' Association, 2026)?

Conclusion

The NDM's reliance on flexibility, simplification, and results-based management functions is a double-edged sword. Flexibility acknowledges the limits of a top-down, "one-size-fits-all" approach to environmental regulation and is therefore necessary to accommodate domestic constraints and localised ecological realities. The negative side lies in this same flexibility. While decentralisation can make policy more responsive, it can also create scope for domestic political pressures to shape environmental ambition, particularly where organised agricultural interests are influential.

The tension is therefore not that projectified governance is inherently incompatible with environmental policy, nor that the NDM has replaced traditional regulatory governance. Instead, the NDM represents a hybrid arrangement in which regulatory and financial controls coexist with strategic planning, decentralised implementation, quantified performance, and results-based monitoring. Viewed through the lens of projectification, the crux lies in the relationship between measurable interventions and environmental objectives that are cumulative, systemic, and generational. The NDM demonstrates how projectification can provide a pragmatic means of governing across multiple levels while creating incentives and institutional conditions that may constrain long-term transformation.

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