



Ministry of Enterprise and Innovation

Swedish comments on indicators in the new CAP

These comments are complementing the comments on indicators that was included in the Swedish written comments in WK 13951/2019 ADD 9.

1.1 Sweden's comments on output and result indicators

1.1.1 O.31 and O.32

Sweden Believes O.31 should be deleted. As all agricultural area would have a requirement from one or more of the GAECs, the information from other Agricultural Environmental and Climate Measure would not be visible in the indicator. Those measures are reported in the indicator 0.13 and thus O.31 would be superfluous. Therefore, there would not be any added value from the O.31.

Sweden believes O.32 should be deleted or else simplified, as it would be very demanding and complex to report.

We suggest simplification as follows:

- Simplification for GAEC 2, here we suggest that agricultural area with peatland and wetland concerned by the GAEC should be mapped in total and reported for the O.32.
- For GAEC 4, we suggest that the whole eligible area where buffer strips are required should be mapped for the 0.32. This is instead of reporting the buffer strips separately, as it would require a separate register for the stripes and create an extra administrative burden, with no added value. The control of the buffer stripes should be

controlled as today within cross compliance and the 1 % control sample.

- For GAEC 9 we suggest that the whole eligible area where there are landscape features should be mapped for the 0.32. That will make the reported area compatible with in LPIS, and thus effective to handle.

1.1.2 R.6 and R.7

France and other countries have put forward a proposal of a revised Annex 1 (WK 1070/2020 ADD1). Indicators R.6 and R.7 are suggested to be deleted. Sweden agrees that these indicators should be deleted. If this is not possible, a simplification is needed.

With the current definitions, these indicators are of limited use for steering towards CAP objectives. First, R.6 and R.7 do not give a correct picture of the distribution of support, since support measures in pillar 2 are not taken into account. Second, it will vary between MS which support schemes are included in these indicators, since eco-schemes should be included but not similar support schemes in pillar 2. Other disadvantages are indicator-specific. Indicator R.6 measures farm size as the individual farm's agricultural area. However, a farm's agricultural area is not necessarily a good measure of the size of the farm business or the economic situation of a farm. Further, the situation for small farms varies depending on country. Small farms are mostly non-commercial farms (with mainly recreational purpose) in some countries, while in other countries small farms are often an important source of family income. Indicator R.7 is difficult to interpret because it will consist of a mix of regions with different conditions for farming and different support levels (in countries with more than one area with constraints).

If these indicators cannot be deleted, our proposal is that R.6 focuses only on CRISS, while R.7 focuses only on ANC-support. We propose that R.6 is calculated as the share of farmers who receives CRISS in a MS, while R.7 is calculated as the share of agricultural area in ANC-areas that receives ANC support.

1.1.3 R.33, R.34 and R.35 The definition of area should be done by the member states themselves

The fiches for these indicators emphasise that operations that are supported in the same area should not be double counted. This was also brought up at the GREXE meeting on the 3rd of December 2019.

Administrative units are of different sizes and practical relevance in different member states. Hence, we would like the member states to themselves be able to define what administrative units these areas are equivalent to.

The underlying problem is that the larger the area, the larger is the risk that two operations could be considered double counted. Currently, all NUTS levels that are in use are equivalent to rather large areas in Sweden.

1.1.4 R.36, R.38 Change “physical animals” to “at farm level”

Sweden suggests removing the words “physical animals” from the indicator fiches, and replace them with “at farm level”. Explaining that double counting should be avoided is enough.

The concept “physical area” entails keeping track of individual parcels of land. Likewise, “physical animals” may sound like the member states need to keep track of individual animals, which is not feasible. However, after explanations made by the commission at the GREXE meeting the 3 October 2019, we do not think that the commission means to keep track of individuals animals. Instead, we understand that what is meant is that the number of animals should be recorded at farm level and double counting should be avoided if there are several interventions that cover the same animals. Therefore, to avoid any future misinterpretations, we suggest removing the words “physical animals” at all places they occur in the indicator fiches and replace them with the words “at farm level”.

1.2 Sweden’s comments on the impact and context indicators

These comments are based on draft list of context and impact indicator fiches for the PMEF as described in Working Paper WK 13622/2019 INIT, dated 28 November 2019.

1.2.1 General comments

Sub-indicators

Many of the context and impact indicators include not only one indicator,

but consist of a number of sub-indicators. Only a few of the fiches make this explicitly clear (e.g. C.08). In many of the fiches the sub-indicators are not explicitly listed (e.g. C.14, C.15, and several others) and in a few it remains unclear how many sub-indicators the fiche refers to (e.g. C.17). Sweden suggests that all the fiches be carefully edited, in particular so that the various sub-indicators are explicitly listed and described in a consistent manner.

Indicator headings and names

The indicator names and headings are not used in a consistent way, particularly for indicators that are simultaneously C and I-indicators. The I-indicator “heading” is frequently a description of a policy goal, sometimes followed by an actual description of the indicator. Often the description provided is incongruous with the name of the indicator, as listed under the heading “Indicator name” in the fiche. See, for example indicator C.09 (I.23) which has the heading “Contributing to growth to rural areas”, followed by a description “Evolution of GDP per head in predominantly rural areas” and, finally, the name “GDP per capita”. This multitude of naming and descriptor practices for a single indicator creates unnecessary confusion that can be easily avoided. Sweden suggests therefore that all the fiches be carefully edited for indicator name and descriptor clarity and consistency. All the indicators should have an unambiguous name, no separate heading, and the policy aim descriptor (e.g. “Contributing to growth in rural areas”) should be removed from the heading and instead included in the fiche contents where appropriate (i.e. for I-indicators).

Urban-rural typologies

A number of indicators use sub-indicators relating to degrees of urbanisation (or similar). At times it is unclear if the urban/intermediate/rural typologies are the same or different. Sweden suggests that the relevant fiches clarify how and if the definitions relate to each other. For example, are the densely-populated area/intermediate urbanised area/thinly populated area definitions and typologies in C.31 the same as those in C.01 or C.06, which also use three levels of urbanisation but use different terms to describe these?

The use of scoreboards

Sweden would also like to receive further details on how the Commission envisages that the C and I-indicators will be used and presented in scoreboards online and how data quality checks will take place.

The current scoreboard for CMEF has a number of problems insofar that data quality control would need improvement. For example, the current (CMEF) indicator I.07 (GHG from agriculture) for Sweden presents data for 2016 that states that more than 100 percent of Sweden's total GHG emissions originate from agriculture, a figure that is manifestly incorrect and logically impossible. With a larger number of impact indicators (and sub-indicators to these) in the future CAP, it is of increased importance that online scoreboards communicate and present clear, understandable and correct data.

1.2.2 Comments on specific fiches and indicators

C.09 (I.23) – GDP per capita. The unit of measurement, PPS, in this indicator seems incorrect and ought to be GDP per capita in EUR by PPS, rather than merely PPS. The unit of measurement relating to percentage is also described in a confusing and convoluted way. Sweden suggests that the unit of measurement for this indicator be clarified and that the fiche clearly indicates the number of sub-indicators included. It should also be clarified if the percentage comparison should be with the EU average or another aggregation (EU-15, and so on). The fiche ambiguous on this point, unlike indicator C.10, which makes clear the reasons for the object of comparison.

C.11 (I.08) – Gross Value Added by sector (etc). The C-indicator consists of a large number of sub-indicators, some (two?) of which also function as I-indicators. The fiche describes this set-up in a rather cumbersome way and could be further edited for clarity.

C.14 – Age structure of farm managers. This fiche is rather unstructured; parts of what is now included in comments are in fact part of the definition. The fiche would benefit from further editing for clarity in this respect. The indicator includes a number of sub-indicators (total number, percentage, ratio), which should be made explicit in the fiche.

C.15 – Agricultural training of farm managers. The indicator includes a number of sub-indicators (by type and level of training, percentages), which should be made explicit in the fiche.

C.16 – New farmers. From the fiche it can be assumed that the definition of new farmer is the same as that currently used by Eurostat, but this definition could be made explicit in the fiche.

C.17 Agricultural area and C.18 Irrigable area. Both indicators use UAA but the fiches have different definitions/descriptions of what is included in UAA. The two indicator fiches should be edited so that the UAA definition is consistent.

C.20 ANCs. It is unclear why ‘Crop statistics for total UAA’ is listed as a data source for this indicator, which aims to track the percentage of UAA under ANC.

C.21 Agricultural land covered with landscape features. As communicated previously, this indicator is likely not to be able to cover the smallest-scale landscape elements. Including also the smallest-scale elements in such an indicator is likely to lead to significant uncertainties relating to the indicator’s accuracy. Sweden suggests that this scale limitation be accepted and also acknowledged and noted in the fiche comments section. This way it will be clear what kinds of landscape elements the indicator is likely to track and which are outside of its scope. In line with this, Sweden also suggests that the fiche be finalised as soon as possible in order to avoid uncertainties for member states and to allow for comparability over time.

C.26 (I.4, I.5) Farm net value added. The fiche is unclear about the number of sub-indicators as it states that the indicator consists of four sub-indicators and then proceeds to list five by name. The I-indicators (I.4 and I.5) are ratios and are indicators in addition to the four (or five) sub-indicators under C.26. This could be made clearer in the fiche.

C.34 (I.28) Value of production under EU quality schemes. This indicator is wider than the title indicates as it includes both the EU quality schemes (PDO and PGI) as well as organic production. The comments section of the fiche clarifies the reason for using PDO and PGI as proxies given the lack of a definition of quality. However, the reason for also including organic production is unclear. SE would prefer if the title clearly indicates what is included in the indicator, i.e. quality schemes and certified organic production. For clarity, the indicator should also include two sub-indicators, one for quality schemes (PDO/PGI), one for certified organic production. The issue of possible double counting, where a certain PDO or PGI value produced might also classify as organic, also needs clarification in the fiche.

C.35 (I.18) Farmland Birds Index (FBI). Although the FBI has its deficiencies as an index, Sweden would prefer to keep this indicator unchanged, due to the existence of relatively long time series of data.

C.36 (I.19) Percentage of species and habitats of Community interest related to agriculture with stable or increasing trends. Sweden will provide more detailed comments on this indicator as part of its forthcoming reply to the consultation exercise request sent by DG AGRI of 12 December 2019.

C.37 (I.17) Water use in agriculture. A number of uncertainties exist in this fiche and it states that methodology is being developed. The caveats also state that there are limitations to the use of WEI+ as an indicator for policy monitoring. For this indicator, it seems that data on MS level on an annual resolution is more readily available than more detailed data (finer spatial and temporal scales). Sweden would like to emphasise the need for clarity in the methodology of the indicators from the onset and recommends that existing data be used. Relying on future development of potential data sets and uncertain reporting on more detailed data creates uncertainties both for policy formulation and planning of evaluations.

C.38 (I.15) Water quality. Sweden would like to emphasise and repeat its earlier comment on this indicator, namely that the Commission investigate if this indicator could be applied on a more detailed geographic level, using existing reporting from Member States to Eurostat. On a technical note, this indicator consists de facto of a number of different indicators and there are even separate fiches for each of them, albeit with the same indicator number. For a consistent approach, the indicators should either be treated as sub-indicators and thus be part of one fiche, or be separate indicators with separate numbers.

C.41 (I.12) Production of renewable energy from agriculture and forestry. The fiche is unclear about how many sub-indicator values this indicator contains. In particular, it is unclear why both the renewable energy produced (the output) as well as the volume or weight of biomass used for the energy production (the input) are included in the indicator. The fiche description specifies only energy values but the unit of measurement also lists biomass volume or weight. The remark in the fiche that the indicator is similar to indicator I.24 is also unclear and possibly erroneous.

C.42 Energy use in agriculture, forestry and food industry. The fiche is unclear about the number of sub-indicators included. The definition states that it includes kilotons, share of total energy consumption, and kg of oil equivalent per ha of UAA and forest land. However, the unit of measurement does not include any reference to share of energy consumption. The fiche also gives mixed information whether forestry energy use should be related to UAA or forest area.

C.45 Direct agricultural loss attributed to disasters. This indicator is based on a sub-indicator from existing reporting to the Sendai Monitoring Framework (Sendai C-2). The existing Sendai C-2 indicator includes fisheries and aquaculture, which may reduce the usefulness of this indicator for tracking agricultural loss. This should be noted as a limitation or caveat in the fiche. In addition, the fiche ought to note that there is potentially a lag in the reporting of loss values in the Sendai Monitoring Framework, depending on whether Member States report values immediately after a disaster, or only once the scale and secondary impacts of a disaster are known. In some cases there may be a de facto time lag of several years between a disaster event and its visibility in the Sendai framework, and that the practices for how soon after a disaster reporting happens may vary between member states.