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WORKING PAPER

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REQUEST FOR CONTRIBUTION

From:	Presidency
To:	Working Party on Horizontal Agricultural Questions (CAP Reform)
N° Cion doc.:	9645/18 + COR 1 + ADD 1
Subject:	Proposal for a Regulation on CAP Strategic Plans - Commission's replies to delegations' comments on impact indicators

Delegations will find in the Annex the Commission's replies to written comments submitted by delegations on impact indicators (as set out in Annex 1 of the Commission proposal).

PROPOSAL FOR A REGULATION ON CAP STRATEGIC PLANS: REPLIES TO DELEGATIONS' COMMENTS

DISCLAIMER:

This document is only intended to facilitate the work of the Working Party on Horizontal Questions in the context of the ordinary legislative procedure.

This document does not anticipate any content of any legislative act and has no interpretative value.

This document includes the replies to written comments on the abovementioned Commission proposal with regard to **Annex I (impact indicators)** following the request by the Austrian Presidency on 04 October 2018 for possible written questions from delegations (WK 11663/2018 INIT).

A separate document will follow containing the replies to written comments on the abovementioned Commission proposal with regard to Annex I (output and result indicators).

ANNEX I: Impact, result and output indicators pursuant to Article 7

<p><u>Impact indicators:</u></p> <p>We have to main questions:</p> <ul style="list-style-type: none"> • How net effect (impact created by the plan) is going to be defined? • What role are Member States to play regarding impact indicators? Are they going to be calculated by the COM? Would it mean that Member States will not have to calculate their impact indicators? Then, how are Member States to coordinate their own evaluations of the CAP Strategic Plan? <p>We would also want to point out that some of the proposed impact indicators do not fit well in this category, e.g. I.1.</p>	<ul style="list-style-type: none"> • Impact indicators are either extracted from existing data sources (e.g. Eurostat) or will be calculated by the Commission, as currently (see the impact indicators of the Common Monitoring and Evaluation Framework in the CAP indicators dashboards). • Impact indicators are not part of the Annual Performance Report. • The role of Member States is to provide the underlying data to Eurostat, EEA, other DGs on time and to ensure the best quality of the data. • The Commission will not calculate annually the net-impacts. This will be part of the evaluation of the policy, which is a multi-annual assessment. Assessing net-impact requires more analysis (such as econometric analysis, modelling...) • Member States are expected to assess the net-impact of their CAP Plans taking into consideration impact indicators within the evaluation framework. • I.1. is indeed different in nature, but in combination with other elements in the CAP regulation, it provides a relatively straight forward indicator to illustrate the contribution of the CAP to modernisation. Public expenditure for R&D is an often used proxy and easy quantifiable indicator. Impact assessment studies reveal that lengthy qualitative case study work is needed to more precisely define impact while still not giving any assurance. Since the CAP innovation projects follow the interactive innovation model and a co-design and co-creation approach within a well-functioning AKIS, measuring the budget is most likely related to impact. See also the Policy brief on Impact of R&I of the SCAR.
<p><u>Impact indicators:</u></p> <p>It is not clear from the regulation, who is going to report on the Impact indicators. For a lot of them the paying agency has to make specific data available . Other indicators are based on normal statistical data. Those data are normally based on the calendar year, not the financial year. It also should be clear if the indicators are to be used at the member state level, the EU level or the level of the national strategic CAP plan concerned</p>	<ul style="list-style-type: none"> • Impact indicators are to be extracted from existing data sources (e.g. Eurostat) or calculated by the Commission, as currently (see the impact indicators of the Common Monitoring and Evaluation Framework in the CAP indicators dashboards). • Impact indicators are calculated at MS level and when available EU level. • Impact indicators are most of the time calculated by calendar year. • Evaluation of the impact (net effect) of CAP/CAP Plans using common impact indicators is to be done by evaluations at MS and EU level as appropriate.
<p><u>Impact indicators:</u></p> <p>Against what total number should the share/percentage be calculated?</p>	<p>There are only four impact indicators which are shares.</p> <ul style="list-style-type: none"> • I.1: The denominator is the total CAP expenditure • I.13 and I.20: The denominator is the total Utilised Agricultural Area, available yearly in Eurostat crop statistics. • I.12: The denominator is the total primary energy production of renewable energy, available in Eurostat’s Renewable energy statistics

<p>Impact indicators:</p> <p>What are the data sources for the indicators? (namely I.4, I.5, I.6, I.8, I.9, I.10, I.11, I.12, I.23)?</p>	<p>I.4 and I.5: FADN (see Context indicator C.26)</p> <p>I.6: DG AGRI based on Eurostat Economic Accounts for Agriculture (see Context indicator C.28)</p> <p>I.8: Eurostat (see Context indicator C.11)</p> <p>I.9: It is a composite indicator, that will be calculated based on other Impact indicators and therefore there are no additional information needs associated with this indicator (see Context indicator C.44)</p> <p>I.10: European Environment Agency (see Context indicator C.43)</p> <p>I.11: European Environment Agency (see Context indicator C.43)</p> <p>I.12: Eurostat and MS' notifications, based on the reporting planned in the Governance of the Energy Union, particularly Annex IX (see Context indicator C.41)</p> <p>I.23: Eurostat (see Context Indicator C.09)</p>
<p>I.1</p> <p>It is difficult to see that this is an impact indicator It seems to be more of a result indicator: the indicator measures the share of the CAP budget used for knowledge sharing and innovation. We understand this to be an cumulative indicator: the share of the CAP budget used for measures related to knowledge sharing and innovation up to the date the indicator is reported. In the CAP plan a list of interventions which fall under this indicator should be made available in order to make reporting data for this indicator possible for the paying agency</p>	<p>I.1. is indeed different in nature. There are no better available and simple indicators to measure the contribution of the CAP to modernisation.</p> <p>It has to be on an annual basis, based on expenditure. The indicator covers notably the funding for EIP operational groups and knowledge sharing, i.e. annual activities.</p> <p>It relates to interventions under Articles 72 and 114 of the CAP plan legal proposal and potentially to interventions under Sectorial Programmes.</p>
<p>I.1 Sharing knowledge and innovation: this is rather a result type of indicator, however it is not possible to plan it as yearly milestone</p>	<p>I.1. is indeed different in nature, but in combination with other elements in the CAP regulation, it provides a relative straight forward indicator to illustrate the contribution of the CAP to modernisation. Public expenditure for R&D is an often used proxy and easy quantifiable indicator. In the case of the CAP and its interactive innovation model, where at the same time the AKIS plans will be improving interconnectivity and knowledge flows, the budget is more reliably related to impact than in usual R&D cases.</p>
<p>I.2</p> <p>This indicator is unclear in what income is going to be compared and with what part of the general economy is to be compared. Also unclear if this indicator is to be measured at the EU level, at the member state level or on the level of the national CAP strategic plan. These seem to be indicators closely linked to EUROSTAT figures based on the FSS (Farm Structure Survey). Why not directly indicate which EUROSTAT figure are to be</p>	<p>The components of the indicator are:</p> <ul style="list-style-type: none"> - Agricultural entrepreneurial income, which measures the income derived from agricultural activities that can be used for the remuneration of own production factors, i.e. non-salaried (= family) labour, land belonging to the agricultural holding and own capital. - AWU in agriculture, which corresponds to the work performed by one person who is occupied on an agricultural holding on a full-time basis. - Gross wages and salaries in all NACE activities at current prices in cash and in kind.

<p>used to compare (and which EUROSTAT figure is to be used to compare agricultural income.) Alternatively, one could look at the income of workers in agriculture, but this would seem counterintuitive to do .</p> <p>Looking at EUROSTAT statistical data of farm income, EUROSTAT itself states that it is difficult to find an instrument that gives good information on farm income 4 Alternatively, if farm income is to be based on the income of genuine farmers: that data is not available for the paying agency on the basis of the proposed CAP regulations (there is no obligation for farmers to provide their income)</p>	<p>Wages and salaries in cash include the values of any social contributions, income taxes, etc. payable by the employee, even if withheld and actually paid directly by the employer on behalf of the employee.</p> <ul style="list-style-type: none"> - The total number of hours worked per employee in all NACE activities. <p>Data sources are Eurostat – Economic Accounts for Agriculture, Eurostat – Agricultural Labour Input Statistics and Eurostat – National Accounts</p> <p>For more explanations, see context indicator C. 21.</p> <p>This is an indicator we often use see e.g. p. 15 of the facts and figures DG AGRI publishes annually on Income. This document provides more explanations on how it can be interpreted.</p>
<p><u>I.3</u></p> <p>Unclear is if this indicator is to be measured at the EU level, at the member state level or on the level of the national CAP strategic plan. These seem to be indicators closely linked to EUROSTAT figures based on the FSS (Farm Structure Survey). Why not name the desired statistic. (see I.2)</p>	<ul style="list-style-type: none"> • This indicator is to be calculated by the Commission, at EU and Member States level. • It is based on factor income figures published annually by Eurostat in the Economic Accounts of Agriculture. • All the details will be made available to MS in indicator fiches; see e.g. Context indicator C.24.
<p><u>I.4</u></p> <p>Unclear is if this indicator is to be measured at the EU level, at the member state level or on the level of the national CAP strategic plan. These seem to be indicators closely linked to EUROSTAT figures based on the FSS (Farm Structure Survey). What sectors are to be used, (are the sectors based on article 39 of the CAP strategic plan regulation?) Why not compare with other sectors of the economy?</p>	<ul style="list-style-type: none"> • This indicator is to be calculated by the Commission, at EU and Member States level. • It is based on FADN data. • Sectors refer to Type of farming; see Context indicator C.26. • The comparison with the other sectors of the economy is done with indicator I.2.
<p><u>I.5</u></p> <p>Unclear is if this indicator is to be measured at the EU level, at the member state level or on the level of the national CAP strategic plan. These seem to be indicators closely linked to EUROSTAT figures based on the FSS (Farm Structure Survey). Who is going to report the data needed especially how is going to be decided when the farm income is to be related to areas with natural constraints. Is there a relation with R.7: (all areas with</p>	<ul style="list-style-type: none"> • This indicator is to be calculated by the Commission, at EU and Member States level. • It is based on FADN data. • It refers to Areas with natural or other area-specific constraints, designated pursuant to Article 32 of Regulation (EU) No 1305/2013. • The comparison with the other sectors of the economy is done with indicator I.2. • It relates to R.7 as it covers support for natural or other area-specific constraints, but not only.

<p>natural constraints or other types of constraints)</p>	
<p>I.6</p> <p>At what level should this be reported: the member states action act on a member state or regional level. Also productivity differs wildly between member states and between sectors.</p>	<ul style="list-style-type: none"> • The Total factor productivity (TFP) compares total agricultural outputs relative to the total inputs used in production of this output (see Context indicator C.28). • It is calculated at EU and Member States level, by DG AGRI, based on Eurostat Economic Accounts for Agriculture • It covers all agricultural sectors and therefore gives a global picture of productivity progress.
<p>I.7</p> <p>It is not clear what this indicator means. Are we talking about the balance of import and export of agricultural products?</p>	<ul style="list-style-type: none"> • It refers to the Total agri-food trade value (imports plus exports)
<p>I.8</p> <p>At what level is this reported, it might vary at the sector level. Is this not also measured with I.3. Also when you want to know what the position of the farmer in the food chain is, you could compare the total added value of product produced and see what part of that added value is earned by the farmer in relation to other players in the food chain</p>	<ul style="list-style-type: none"> • It is reported at MS and EU level. • For agriculture and primary producers It corresponds to: Gross value added at basic prices + subsidies on production -other taxes on production (Eurostat table Economic accounts for agriculture - aact_eaa01) • It can be expressed in absolute value or as a share as in the current Common Monitoring and Evaluation Framework. • It differs from I.3 (showing the evolution over time of agricultural factor income per full time equivalent) because it relates to the gross value added of the agricultural sector as a whole and depreciation is not accounted for.
<p>I.9</p> <p>What is this index?</p>	<p>Index of farm resilience, Adaptation potential to climate change</p> <p>It is a composite indicator, calculated based on:</p> <ul style="list-style-type: none"> - I.3 Reducing farm income variability: evolution of agricultural income; - I.11 Enhancing carbon sequestration: increase the soil organic carbon - I.20 Enhanced provision of ecosystem services: share of UUA covered with landscape features - I.13 Reducing soil erosion: Percentage of land in moderate and severe soil erosion on agricultural land

	- I.15 Reducing pressure on water resource: Water Exploitation Index Plus (WEI+)
<p><u>I.10</u></p> <p>This is a stated policy goal, not an indicator. Why not have the actual emissions of the agricultural sector as an impact indicator? Is this reported on member state level or EU level (or both)</p>	<ul style="list-style-type: none"> • This indicator refers to Non-CO2 GHG emissions from agriculture • It will be clarified in the indicator fiche • It is reported at EU and Member State level by DG AGRI • The data source is the European Environment Agency (see Context indicator C.43)
<p><u>I.11</u></p> <p>This is a stated policy goal, not an indicator. If the goal is measuring the impact of carbon sequestration the impact indicator could be the level of CO2 in the atmosphere.</p>	<ul style="list-style-type: none"> • This indicator refers to Soil organic matter in arable land • It will be clarified in the indicator fiche • See also Context indicator C.39
<p><u>I.12</u></p> <p>This is a stated policy goal, not an indicator. Why only from agriculture and forestry (or is this biofuel/biomass energy). The use of solar energy, wind energy etc should also be considered.</p>	<ul style="list-style-type: none"> • It refers to Production of renewable energy from agricultural and forestry biomass • See also Context indicator C.41 • Production (not use) of solar and wind energy by farmers (in case the farmers are the owners of the installation) can be added to the indicator, for use when countries have data.
<p><u>I.13</u></p> <p>Is there a common definition of moderate and severe soil erosion applicable in the whole EU. Where is the data coming from?</p>	<ul style="list-style-type: none"> • It refers to agricultural areas susceptible to a rate of soil erosion considered unsustainable, i.e. above 5 t/ha/year • The data source is the Joint Research Centre.
<p><u>I.14</u></p> <p>This is a stated policy goal, not an indicator. What is the necessity of this indicator when there is indicator I.10.</p>	<ul style="list-style-type: none"> • It refers to total annual ammonia emissions (NH3) from agriculture, considering manure management, as well as application of fertilizers and manure to soils. • See also Context indicator C.46 • Ammonia emissions affect air quality, while I.10 refers to Non-CO2 GHG emissions from agriculture driving climate change.

<p><u>I.15</u></p> <p>On what level is this to be calculated, where is the data coming from and why does this measure the impact of the measures aimed at water quality. This indicator is redundant, see I.16</p>	<ul style="list-style-type: none"> • The gross nutrient balance is estimated by Member State and for the EU by Eurostat based on data reported by Member States. • It refers to Nitrates here, see also Context indicator C.38 • The data source is the Statistical Office of the European Union (Eurostat), based on data reported by the Member States. • The indicator represents the potential threat to water quality of nitrogen surplus or deficit in agricultural soils. • It is not redundant with I.16 because water quality is one of the main environmental issues, with EU legislation, and it is difficult to distinguish the contribution of agriculture compared to other influencing factors. While I.15 (GNB) provides the best possible measurement of potential risks and impacts of agriculture on water, I.16 provides a direct link with the territory as it is based on field measurements, allowing focusing areas with problems.
<p><u>I.16</u></p> <p>On what level is this reported (member state, region, EU). With this indicator indicator I.15 is redundant.</p>	<ul style="list-style-type: none"> • This indicator shows the potential impact of agriculture on groundwater quality due to pollution by nitrates. • It is not redundant with I.15 (see above)
<p><u>I.18</u></p> <p>This is a pretty specific indicator when the EU goal is not only aimed at meadow birds but also on protection of biodiversity in general. Why this indicator and indicator I.19.</p>	<ul style="list-style-type: none"> • Most impact indicators, and in particular the ones related to environment and climate, are not univocally linked to agriculture, and even less with the CAP. Biodiversity, water and air quality, resilience, etc, depend on many factors. The CAP is expected to support certain environmental objectives but not to fully deliver on them. The changes in these indicators will need careful interpretation. • Birds are considered umbrella species, placed at the top of trophic chains, and therefore their populations are supposed to reflect environmental trends.
<p><u>I.18</u></p> <p>Of the quite poor indicators for biodiversity, this is the best one. However, the specifications of the indicator and collection of data have not been harmonised, which means that it cannot be used for comparisons between EU Member States</p>	<ul style="list-style-type: none"> • There is a national and an EU farmland bird index, i.e. a common list of species at EU level, and a wider list for each country. The fiche explains it well (See Context Indicator C.35).
<p><u>I.19</u></p> <p>This indicator is vague. Why choose not a few specific indicators that are indicative of the state of biodiversity in the EU, like the farmland bird index and name them. (combine I.18 and I.19 with a few specific indicators)</p>	<ul style="list-style-type: none"> • This indicator is not vague; it is more precise and specific than the Farmland Bird Index. It will build on official reports by MS on status of species and habitats of the Habitats Directive, i.e. on data coming from the MS, which are official. • The methodology is still under development, but it will build on the conservation status reported for habitats and species linked or dependent on habitats that can be influenced by CAP.

<p><u>I.19</u></p> <p>The link of this indicator to CAP is very weak, at least in the Finnish conditions, and we have understood that this is the case in the whole of the EU. This indicator should be abolished</p>	<ul style="list-style-type: none"> • The link with the CAP is straightforward: there are species and habitats directly affected by the management decisions the CAP is promoting, which should be beneficial for biodiversity. • It is planned that the species and habitats chosen as linked to agriculture and the CAP will be consulted with MS. • The indicator makes the right link between CAP and the EU biodiversity policy.
<p><u>I.20</u></p> <p>This data might not be available as this concerns all landscape features and not just landscape features that are subsidized (of course depending on the definition of landscape features and the strategic cap plan in the member state concerned). Also, this does not measure an impact, it measures a result of the interventions. Also the focus is very narrow for the broad description of the indicator, there are a lot more eco system services possible besides landscape features.</p>	<ul style="list-style-type: none"> • This indicator aims to describe the area covered by landscape features that support biodiversity and ecosystem services in agricultural landscapes. • This is an Impact indicator with a closer link to our interventions. But it does not refer only to supported landscape features. • This indicator is under development. Two options are under consideration, with use of satellite imagery (Copernicus) fed with IACS/LPIS data in stand alone, or in combination with field samplings through transects (LUCAS).
<p><u>I.21</u></p> <p>As stated the indicator just measures the number of new farms. This says very little about the amount of young farmers as a new farm might not be farmed by a young farmer. Also existing farms can be exploited by young farmers. Also, the number of young farmers might still be the same, but the total number of farms might change, influencing the percentage of young farmers. Is it not more interesting to look at the age distribution in farming compared to the age distribution in the general population to judge the impact of the policies concerning young farmers?</p>	<ul style="list-style-type: none"> • The age distribution of farmers is a context indicator (C.14) and therefore will be also looked at when evaluating the performance of the CAP. • This impact indicator aims at grasping the attractiveness of the farming sector. • In combination with R.30 (Number of young farmers setting up a farm with CAP support), it will help us to assess the performance of CAP interventions for attracting more particularly young farmers.
<p><u>I.21</u></p> <p>in line with the specific objectives, "young" and "SMEs" should be added.</p>	<ul style="list-style-type: none"> • The number of rural entrepreneurs setting up a business with CAP support is to be recorded under O.23 • The total number of jobs created in rural areas as a direct result of CAP support is to be provided under R.31.

<p><u>I.21</u></p> <p>the title refers to young farmers, but the description refers to new farmers</p>	<ul style="list-style-type: none"> • This impact indicator aims at grasping the attractiveness of the farming sector as a whole and its contribution to jobs creation. • In combination with R.30 (Number of young farmers setting up a farm with CAP support), it will help to assess the performance of CAP interventions for attracting more particularly young farmers.
<p><u>I.22</u></p> <p>If this is to be judged at the EU level, a common definition of predominantly rural areas is to be used. This could mean that large parts of member states (case in point the Netherlands) are not part of this indicator</p>	<ul style="list-style-type: none"> • The rural employment rate is calculated at national and EU level using Eurostat - Labour Force Survey (LFS) data aggregated by degree of urbanisation. • This degree of urbanisation classifies the territory (Local Administrative Units (LAU)) into rural areas, towns and suburbs and cities. • It aims at assessing the CAP contribution to jobs and growth in rural areas. • The specificity of the Netherlands is well noted • See Context indicator C.05 and the CAP indicators dashboards on jobs & growth already online.
<p><u>I.23</u></p> <p>If this is to be judged at the EU level, a common definition of predominantly rural areas is to be used. This could mean that large parts of member states (case in point the Netherlands) are not part of this indicator</p>	<ul style="list-style-type: none"> • This indicator is calculated by Member State and at EU level • It aims at assessing the CAP contribution to jobs and growth in rural areas. • The specificity of the Netherlands is well noted • See Context indicator C.09 and the CAP indicators dashboards on jobs & growth already online.
<p><u>I.23</u></p> <p>Evolution of GDP per head in rural areas is a relevant indicator if the CAP Plan is expected to have net impacts on GDP growth in rural areas. This may be difficult to verify due to the many national and global trends that impact on this. How can a reliable net value of the impacts be compiled for this indicator?</p>	<ul style="list-style-type: none"> • The Commission will not calculate annually the net-impacts. This will be part of the evaluation of the policy, which is a multi-annual assessment. • For an assessment of these net effects of the current CAP, see e.g. the World Bank study on CAP.
<p><u>I.24</u></p> <p>This is a policy statement, not an indicator. What constitutes fair, what is improved distribution? Why is a fairer distribution an impact. As we understand it, a fairer distribution is a policy goal aimed at getting more effect from the same EU budget. As such impact of this policy could be measured looking at the other impact indicators. If the distribution has changed according to policy could be an result indicator.</p>	<ul style="list-style-type: none"> • The indicator is the Share of support received by 20% of the largest beneficiaries of the CAP and Interquartile range of CAP support by beneficiary. • It aims at check the fairness of support distribution. • There is already a result indicator on the redistribution to small farmers. • This indicators aims at providing a more global picture on the distribution of direct payments and ANC support. It measures notably the impact of the redistributive payment to small and medium size farms, capping, degressivity,...

<p><u>I.25</u></p> <p>Why is this indicator necessary when you have I.2 and I.3. As discussed at these indicators the EUROSTAT figures relate to income in rural areas and not directly farmers. This indicator seems to be redundant</p>	<ul style="list-style-type: none"> • One of the specific objective of the CAP is to promote employment, growth, social inclusion and local development in rural areas • CAP interventions are not solely targeted to farmers. • In addition, CAP support to the farming sector has spill over effects on the rural economy • Thus the need of indicators for rural areas.
<p><u>I.26</u></p> <p>This seems to be more of a result indicator. Is this data available?</p>	<ul style="list-style-type: none"> • The data on antimicrobial veterinary medicinal products is currently provided by MS voluntarily and collected in the European Surveillance of Veterinary Antimicrobial Consumption (ESVAC) coordinated by the European Medicines Agency (EMA). Data are currently available for 27 MS (excluding MT). • The data collection should become compulsory with the new Regulation on veterinary medicinal products (from end 2021).
<p><u>I.27</u></p> <p>This is stating a policy goal, not an impact indicator. It should probably be split up in types of pesticides uses. Why only pesticides and not also herbicides?</p>	<ul style="list-style-type: none"> • It is an index based on the annual volume of active substances sold: EU level hazard-based harmonized indicator of risk associated with pesticides: Annex IV of Directive 2009/128/EC (sustainable use of pesticides), currently under discussion (DG SANTE) • The indicator is based on Eurostat statistics on the placing on the market (sales) of pesticides (Agri-environmental indicator 6. Consumption of pesticides) available at MS and EU level from 2011. • The proposed Annex IV of the Directive indicate a methodology for categorisation and weighting based on the properties of active substances, in order to obtain a single harmonised and EU level index. Once the revised Directive will enter into force, the pesticides sales data will be calculated with the methodology established in the Annex IV. • It covers herbicides too.
<p><u>I.28</u></p> <p>This is seems to be more of an result than an impact. Impact would be the amount of quality food available. The difficulty with that is of course the definition of quality food. Why only EU quality schemes? (some of the biggest quality schemes in the Netherlands are private: Beter leven keurmerk en weidemelk)</p>	<ul style="list-style-type: none"> • Comment noted. • It refers only to EU quality schemes and organics for which there is a clear and common definition. • An indicator on the amount of quality food would be too difficult to aggregate given the wide variety of products concerned.

1.28 Responding to consumer demand for quality food: Value of production under EU quality schemes (incl. organics) To assess the impact of the CAP on this aspect, there might be a more suitable impact indicator.

- Comment noted