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WORKING PAPER

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WORKING DOCUMENT

From: Presidency
To: Working Party on Horizontal Agricultural Questions (CAP Reform)
N° Cion doc.: 9645/18 + COR 1 + ADD1

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 second part of the Commission's replies to written comments submitted by delegations on impact indicators (as set out in Annex 1 of the Commission proposal). This documents complements the first part of the Commission's replies on the same subject as set out in document WK 11663/2018 ADD 6.

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 as internal reflections may still be on-going.

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

This documents complements the Commission's replies to written comments submitted by delegations on impact indicators as set out in document WK 11663/2018 ADD 6.

<p>Annex I: Impact, result and output indicators pursuant to Article 7</p>	
<p>Indicator fiches describing each indicator characteristics are required in order to avoid the ambiguities currently present. Those fiches should in particular clarify issues linked to:</p> <ol style="list-style-type: none"> 1. Temporal scope 2. Links to relevant articles of the CSP Regulation 3. Homogenisation of output indicators (three unique types of indicators are proposed: number of beneficiaries, number of hectares or LU and number of operations/projects) 4. Level of disaggregation needed for each indicator 5. Counting of partially implemented operations 6. Avoidance of double counting 7. Harmonisation between “number of farmers” and “number of farms” 	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation</p>
<p>In a general way, for all the intervention type: “Investments”, under the provisions of Article 68, the various possible types of investments should be detailed in this article. In particular we would like to know where forest investments are included.</p>	<p>Under article 68, Member States can support any tangible or intangible investments contributing to one or more of the specific objectives referred to in art 5, apart from those specifically excluded in Article 68(3). Therefore, relevant forest investments can also be supported. There is no need, no possibility and therefore no intention to detail all possible types of investments in this article, as this be contrary to the logic of the new delivery system and likely to introduce unnecessary rigidities</p>
<p>In order to simplify the output indicators, we propose to limit them to 3 indicators: hectares, number of beneficiaries and euros. This should then be reported per intervention.</p>	<p>Comment noted Certain output indicators (such as the three mentioned, are indeed used in relation to a number of different interventions). It is necessary for performance clearance that values are reported in relation to each intervention, or separate unit amount within an intervention.</p>
<p>We doubt if all output indicators are necessary and what their relationship is with the financial reporting (X-table). The output indicators should meaningfully aggregate outputs of all types of intervention.</p>	<p>Output indicators included in Annex 1 are meant to reflect in exhaustive way the scope of the different types of interventions included in the CSP Regulation. This is indispensable for the functioning of the performance clearance and the proper monitoring of the performance of the CAP Plans. Member States are invited to signal any possible gaps they would perceive in this respect. Financial reporting is about financial issues (money spent in relation to the</p>

	interventions), while output indicators measure the physical achievements linked to interventions implemented.
General for O.1, O.24, O.25, O.26, O.27 and O.28: Why is this amount of indicators necessary for cooperation. Is this subdivision not something more needed as results (for target setting?).	The output indicators proposed for the type of intervention “cooperation” are meant to reflect in an exhaustive way, and with a certain level of detail, the scope of this type of intervention (i.e. the different interventions possible under this type of intervention)
It should be clear that output indicators are yearly totals, not accumulative. This means that in the definitions of output indicators it should be clear what the conditions are for an indicator to be counted in a specific year. Also on the basis of article 121 of the Cap strategic plan regulation, the totals are based on the financial year, not the calendar year.	Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. The reporting period of each Annual Performance Report (APR) will be the preceding financial year (i.e. the APR submitted in year n will cover the period 16/10/n-2 to 15/10/n-1)

<p>The output indicators are generally acceptable. However, Member States should only be required to select one output indicator per intervention</p>	<p>For the purpose of the performance clearance, the Member States will be required to plan and report one output indicator per intervention. In case more than one unit amount is set for a given intervention, the Member States will have to plan and report that output indicator per each unit amount.</p> <p>In addition to the output indicators needed for the performance clearance, a limited number of additional output indicators will have to be reported (not planned) for the purpose of monitoring the performance of the CAP plans (e.g. number of beneficiaries per intervention).</p>
<p>O.1 Number of EIP operational groups It is required to define the moment this aid/support can be taken into account, i.e. if it is needed that the project is finalised and all the payments done or the project can be taken into account even if there are payments still pending.</p> <p>Drafting suggestion: O.1 Number of EIP operational groups established (that have received at least one payment by the date of calculation of the indicator)</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation (this question is relevant also for output indicators other than O.1).</p> <p>Drafting suggestion noted</p>
<p>O.1 Number of EIP operational groups</p> <p>Number of EIP groups is measurable. However it is not clear how the EIP groups should be measured. It should therefore be clear that it is the number of EIP operational groups that are actively supported in the year of reporting (are in fact subsidized by the EU budget in that year). Or it could be preferable to count EIP operational groups who are granted aid and the project itself is not yet ended (with ending defined as having received the final payment for a project).</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation.</p>
<p>O.2 Number of advisors setting up or participating in EIP operational groups It is required to clarify the definition of “advisor”. During the period 14-20, for operational groups, the number of partners and their nature/type/sector was monitored. We consider that to take into account this would be more interesting.</p>	<p>The term “advisor” identifies a person (NB: not institutes or organisations), which is engaged in any of the advisory oriented interventions integrated within the AKIS system. Note is taken on the suggestion. In line with the intention to simplify the legal framework, not all current indicators have been retained.</p> <p>This AKIS system will be organised by the Member States according to art 102 and supported with interventions under the CAP plan, mainly under Art 71 and 72 (e.g. use of advice by farmers; training of advisors; cross-visits for advisors; knowledge exchange</p>

	<p>activities between advisors, CAP networks and research working together; setting up or participation in EIP OGs etc). The advisors need to fulfil the requirements set out in Art 13. An advisor under the new CAP therefore should give impartial advice on farm, covering economical, environmental and social dimensions. This should provide him/her with enough view and a holistic understanding of the on-farm processes and farmers' needs and opportunities. As a result he/she will have more impact on farm decision making. The advisor may be providing a public or a private service</p>
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<p>O2 - Guidance on what constitutes an advisor is needed. Should institutions be counted as one advisor, or is the number of personnel involved with the EIP operational group the relevant measurement. When is an employee of an organisation or institution an advisor for the purpose of this indicator. What is the definition of an advisor. Why is this an output indicator. The number of advisors seem also to be a result of the funding of EIP operational groups and potentially the funding of the Farm Advisory service. In our current situation of the FAS, we are not considering subsidizing the FAS nor setting up a public FAS system. As this is not relating to an intervention it should be deleted</p>	<p>See answer to previous question</p>
<p>O.3 Number of CAP support beneficiaries It is required to detail to what beneficiaries this indicator refers to: i.e. support under the provisions of what article. We understand that we should not add different types of beneficiaries: e.g. industries and farmers. Therefore it is necessary to precise the articles that must be taken into account and if only farmers are included in this indicator. In addition, we understand that this figure must be UNIQUE, that is to say, the beneficiary is counted only once, even if he/she receives several different aids.</p> <p>Drafting suggestion: O.3 Number of CAP support beneficiaries under the provisions of Article X</p>	<p>Indicator O.3 refers to the number of beneficiaries receiving financial support. Indeed, beneficiaries have to be counted only once under this indicator even when the same beneficiary receives support under more than one intervention. The indicator fiche will provide specific details of the calculation method.</p> <p>Drafting suggestion noted</p>
<p>O3</p> <p>We interpret this as the number of unique beneficiaries who receive at least a payment in the year concerned. A collective action with multiple end beneficiaries is counted as one beneficiary. For instance an EIP operational group, an producer association in sectoral interventions or a group of farmers getting support for agro environment measures in a collective approach is counted once. We do not see why this number in itself is useful.</p> <p>What is the relation to the X-tabel? Or should we interpret this as a indicator per intervention (as is suggested by the heading of the</p>	<p>See previous reply on O3. A single “collective” body receiving the support will be counted as one beneficiary under this indicator</p> <p>As indicated in the heading of the last column of Annex 1, all output indicators have to be provided by intervention. In addition, specific essential aggregates will have to be reported, including for O.1 O.5, O.7, O.8, O.22, O.23, O.24, O.25, O.26, O.28, O.29 and O.30</p>

<p>table). In this case it should be clear what aggregation level is to be used.).</p> <p>What is the relationship between this output indicator and O.1 O.5, O.7, O.8, O.22, O.23, O.24, O.25, O.26, O.28, O.29 and O.30? In Annex I in the heading above O3 it is said that the output-indicators are per intervention. This raises the question why all those other output-indicators are included?</p>	
<p>O3 - There should be a different method of calculation for different types of intervention to ensure the usefulness of this information. In case of investments, the planned indicator shall rise during the programming period. In case of area based interventions (i.e. area-based direct payments or multi-annual commitments), the planned value shall be more or less constant. Also, we need to know whether one beneficiary may be counted only once. In case of knowledge transfer, there is a difference between the target group and the financial beneficiary. In this case, the number of institutions that organize the knowledge transfer is not relevant. The relevant information is how many farmers participate at the vocational trainings (as in O.29).</p>	<p>See answer to previous question.</p> <p>It is acknowledged that the evolution in the number of beneficiaries of area-related interventions and investment-related interventions with annual payments can follow quite different trends over time. The methodology to address this will be explained in each indicator fiche.</p> <p>For the value for O.3 for a particular financial year, each beneficiary will have to be counted once for each relevant intervention. If a certain beneficiary receives financial support under more than one interventions, this beneficiary will have to be considered (once) under each of the relevant interventions.</p> <p>In case a certain institution is the recipient of financial support for providing training, this institution will be counted as the beneficiary for that intervention.</p> <p>By contrast, for certain result indicators, the number of ultimate beneficiaries is required (e.g. farmers participating into a mutual fund in R5).</p>
<p>O4 - Made clear that only hectares that resulted in payments are to be counted.</p>	<p>The fact that only hectares that resulted in payments are to be counted seems implicit from the formulation of the indicator. This will be clarified in the indicator fiche. In the context of the clearance of accounts Ha linked to partial payments will be counted partially (further clarification will be provided in the context of discussions on clearance of accounts)</p>
<p>O5 - a clear and single definition should be used for the different output-indicators! Made clear that receiving decoupled direct payments is the threshold for being counted. Why is it necessary to count the number of beneficiaries and the number of hectares as output? If the output indicators are related to financial clearance, then the number of beneficiaries is irrelevant for decoupled DP.</p>	<p>[NB: we understand the term “threshold” in the meaning of “criterion”]</p> <p>It is clear that the indicator needed for the performance clearance under most decoupled direct payments interventions is the number of hectares.</p> <p>The number of beneficiaries is however necessary for the performance clearance of the Round sum for small farmers. It is also useful for considering distribution aspects, which will matter under certain other indicators, such as R6. It is also essential for properly monitoring the performance of the CAP Plans.</p>

<p>O6 - Ha “eligible for” enhanced income support should be counted (instead of “subject to”) to make clear that only hectares that lead to a payment for enhanced income support should count in a specific financial year</p>	<p>Drafting suggestion noted However, in order to count only hectares for which payments were made, the formulation “subject to” appears better placed than “entitled”. Please also note that in the context of the clearance of accounts Ha linked to partial payments will be counted partially (further clarification will be provided in the context of discussions on clearance of accounts)</p>
<p>O6 and O7 - Why is it necessary to count the number of beneficiaries and the number of hectares as output. If the output indicators are related to financial clearance, then the number of beneficiaries is irrelevant for enhanced income support.</p>	<p>It is clear that the indicator needed for the performance clearance under most decoupled direct payments interventions is the number of hectares. The number of beneficiaries is however also essential in properly monitoring the performance of the CAP Plans.</p>
<p>O6 and O7: To confirm if they refer to the decoupled direct support for young farmers set under the provisions of Article 27.</p>	<p>Yes, confirmed.</p>
<p>O7 – Number of “genuine farmers receiving” enhanced income support for young farmers should be counted (instead of “beneficiaries subject to”). Also, this should be counted “in a financial year”.</p>	<p>All types of decoupled direct payments are intended for genuine farmers only. We see no need to specify this for O7</p>
<p>O8 The result indicator associated with this R.5 uses ”share of farms” . There should be no real difference between” share of farms” and “share of farmers”. Also farm is not defined in the CAP strategic plan regulation while farmer is defined, it does not seem logical to use “share of farms”. In any case, these two indicators should use the same way to count the relevant data. It should be clear which risk management tools should be included and how we count them. For instance in article 42 risk management is stated as one of the goals in the fruits and vegetable sectors for the Operational programs. In article 43 (2) the possible types of intervention are stated. If these interventions are also to be enumerated within this indicator, it is not clear how the number of farms/farmers should be counted, when support is given to (an association of) producer</p>	<p>Although Output indicators and Result indicators are both generated by the implementation of interventions, they are not necessarily based on the same unit of measurement. This is due to the different functions of the two types of indicators. Comment concerning the fact that “share of farms” would be more suitable in this case is noted.</p> <ul style="list-style-type: none"> • All interventions addressing risk management tools (e.g. through the support to the fruit & vegetable sector (art. 43.2), the wine sector (art 52.1. c, d and i), other sectors (art 60.2) and/or RD type of intervention “risk management tools” (art. 70)) are targeted by this indicator. The number of outputs will have to be detailed per intervention. Further details will be provided in the indicator fiches.

<p>organisations. Indeed for some type of interventions (mutual funds, market withdrawal) the whole sector could be seen as benefitting from such action. Should then all farmers concerned be counted? However, from the place in the table it seems clear the risk management tools in article 64 of the CAP strategic plan regulation are the target of this indicator. This is reflected in our drafting suggestion</p>	
<p>O.8 Since the process of setting up the risk management instrument is quite complex, it is not possible to predict the yearly indicator value at the time of submitting the CAP strategic plan to the COM.</p>	<p>The annual planned outputs have an indicative nature. They have to be set based on plausible estimations and lessons learnt from current and previous periods of CAP implementation. Relevant explanations provided by the MS to justify observed deviations from planned values will be taken into consideration in the context of the performance clearance.</p>
<p>O.9 The number of hectares coupled support are clear. It is not clear if coupled support for the farming of silk worms should be reported under this heading or O.10. Made clear that only hectares that lead to payment are meant to be counted. If this output indicator is enough for coupled support, this would suggest counting beneficiary's receiving support for hectares or other countable things, is not necessary. We suggest to use this indicator per sector referred to in Article 30.</p>	<p>1/ For Coupled Income Support (CIS), an output indicator corresponds to the actually paid hectares/heads per financial year. 2/ Silkworms is a specific category, to be reported under O.10. Obviously they cannot be counted in heads (or at least not directly). It is therefore proposed to introduce an exception in this case and report in kg of cocoons. 3/ It can be confirmed that the number of beneficiaries is not required for the purpose of performance clearance, however, it is essential in properly monitoring the performance of the CAP Plans. Also, such data (i.e. the share of farmers benefitting from CIS per sector) will be used in the context of the result indicators (R8 in the case of CIS).</p>
<p>O.9 How should the indicators be planned for coupled support in the context of coupled support principles? The draft regulation is rather vague as regards rules for the CIS. Will there be a reference period against which a certain output should be fixed/planned? Can there be an upward trend of the output during the programming period? Secondly, how should the planning be carried out if there is a lack of historical data for certain commodities?</p>	<p>1/ Despite the fact that CIS has no restriction in terms of the output trend, it will still aim at addressing the difficulties of the targeted sectors/types of farming, not at boosting the level of production. In this regard, the support decisions shall fulfil the various strict pre-conditions (difficulty, importance, aim) and limits (budgetary limit, variation of the unit rate) that apply to CIS. These principle and elements will be carefully assessed by the Commission in the CAP plans submitted by the Member States for approval. 2/ As for the planning, the Member States should in the first place ensure consistency within their support strategy. Support decisions should arise from the identified support needs based upon their SWOT analysis and needs assessment. The Member States have large leeway in carrying out this assessment, but the support need must be clear and well</p>

substantiated with relevant statistical proof, and the interventions (targeting, unit rate, etc) shall correspond to this identified need.

3/ No reference period is set up in the draft legislation and the justification of CIS interventions do not have necessarily to be based upon fixed number of hectares/animals based upon a reference period, either. However, this does not prevent Member States to base themselves on a past reference period defined by them when assessing their needs and designing their interventions and planned outputs.

<p>O.10 Number of heads benefiting from coupled support Could it be possible to use LU? It is required to clarify if it is needed to differentiate by type of production: cow, sheep, goat; or not, and if it includes or not to silkworm production (subsidies are paid by the box).</p>	<p>As far as the implementation of their interventions is concerned, the Member States have large leeway in this regard. For instance, the beneficiaries may be paid per LU indeed. However, for the sake of harmonization, a common reporting basis is needed. Further details will be provided in the indicator fiche. The exception is silkworms, where, similarly to VCS, the reporting should be based upon kg of cocoons.</p>
<p>O.10 The number of head seems clear. Do we count silk worms ;-). However in O.16 the number of life stock units (LU) is used. This seems to be a better fit for comparing the relative impact of payments for different kind of farm animals. (LSU from EUROSTAT) This suggestion concerning LSU is not needed when the outputs have to be reported per intervention.</p>	<p>Please see the reply above.</p>
<p>O.11 This output indicator references the support in article 66¹ of the cap strategic plan regulation we presume (it is not exactly clear what ANC top up means, top up is not mentioned in the CAP strategic plan regulation). The categories referenced are the 3 categories of article 32 (1). It is not clear what the meaning is of the reference in parenthesis to these categories. The drafting suggestion makes clear only 1 number is will be reported. It is not clear that the output indicator should be under the category “coupled support” as this is not support for production.</p>	<p>Yes, indicator O.11 refers to the type of intervention under article 66, notably the hectares covered by ANC payments. The text in parenthesis refers to the three ANC possible delimitations according to art. 32(1) (i.e. “mountain areas”, “areas, other than mountain areas, facing significant natural constraints”, and “other areas affected by specific constraints”) This indicator does not refer to coupled support.</p>
<p>O.11 Why only ANC top ups? Why not co-financed?</p>	<p>See previous answer</p>
<p>O.12 Number of ha receiving support under Natura 2000 or the Water Framework Directive This output indicator references the support in article 67 of the cap strategic plan regulation. In this article no mention is made of Natura 2000. The drafting suggestion make a direct link to the relevant article,</p>	<p>Indeed O.12 refers to the type of intervention under article 67 “areas specific disadvantages resulting from certain mandatory requirements”. This includes the areas delimited pursuing Directives 92/43/EEC and 2009/147/EC (“Natura 2000”) and 2000/60/EC (“Water Framework Directive”). “Natura 2000” is directly mentioned in art 67(3)(a) and (b)</p>

<p>making the difference moot. Hectares cannot receive support. It is not clear that the output indicator should be under the category “coupled support” as this is not support for production.</p>	<p>This indicator does not refer to coupled support.</p>
<p>O.12 Number of ha receiving support under Natura 2000 or the Water Framework Directive In order to calculate result indicator R28 this indicator needs to be disaggregated.</p>	<p>Indeed, R28 only refers to Natura 2000 areas. Therefore hectares covered by the support for Water Framework Directive requirements will not be counted for R.28.</p>
<p>O.13 On the basis of O.31 is concluded that this indicator is only concerned with the agro-environment/climate measures in article 64(a) and article 65 of the CAP strategic plan regulation. Going beyond mandatory requirements is deleted because agro-environment/climate measures in article 65 are by definition beyond mandatory requirements. To distinguish with O.14 it is made clear the area has to be agricultural area as defined in the national CAP strategic plan. To distinguish with O.15 It is not clear that the output indicator should be under the category “coupled support” as this is not support for production</p>	<p>O.13 refers to “environmental/climate commitments going beyond mandatory requirements”. Management commitments and relevant sectoral programmes interventions are relevant for this indicator (NB: number of hectares devoted to eco-schemes under art. 28 will be reported through Output Indicator O.4). O.31 has a broader scope, as it includes also hectares with no commitments going beyond conditionality requirements.</p> <p>The reference to “going beyond mandatory requirements” qualifies the types of commitments which have to be considered under this indicator, and therefore cannot be deleted.</p> <p>The definition of the indicator refers clearly to “agricultural” area, in contrast with O.14, which refers to “forestry”. There seems to be no ambiguity between the definitions of the two indicators.</p> <p>O.13 indicator does not refer to coupled support.</p>
<p>O.13 Number of ha (agricultural) covered by environment/climate commitments going beyond mandatory requirements Please clarify if one hectare that is subject to two or more commitments should be counted once or more times. I.e. would it be the total area (double counting) or physical real area Total real area / or double counting of the same area In order to calculate result indicators R12, R13, R14 or R21 this indicator needs to be disaggregated.</p>	<p>Each hectare covered by more than one commitment will have to be counted only once under this indicator.</p> <p>The hectares covered by each intervention will have to be attributed to one or more relevant result indicators, in function of the nature of the underlying commitments</p> <p>In case different unit amounts are defined for an intervention to which O.13 applies, this output indicator will have to be planned/reported at the level of each of the defined unit amounts</p>
<p>O.14: In order to calculate result indicator R25 this indicator needs to be disaggregated.</p>	<p>See previous answer. Please also note that, in principle, certain forestry commitments may well contribute to both R25 (“forest protection and management”), and R26 (“forest landscapes, biodiversity and ecosystem services”).</p>

<p>O.14 On the basis of O.31 is concluded that this indicator is only concerned with the agro-environment/climate measures in article 64(a) and article 65 of the CAP strategic plan regulation. Going beyond mandatory requirements is deleted because agro-environment/climate measures in article 65 are by definition beyond mandatory requirements. To delineate with O.13 it is made clear the area is not agricultural area as defined in the national CAP strategic plan. It is not clear that the output indicator should be under the category “coupled support” as this is not support for production.</p>	<p>See previous answer on O.13</p>
<p>O.15 On the basis of O.31 is concluded that this indicator is only for organic farming support both for forest and for agricultural area.</p>	<p>Indeed, O.15 refers to hectares covered by support for organic farming. By definition, only agricultural areas is concerned by this indicator</p>
<p>O.16: The proposal for a regulation does not include payments for commitments for LU. In order to calculate result indicators R36 and R38 this indicator needs to be disaggregated.</p>	<p>Animal-related commitments are possible under art 65 (e.g. commitments for animal welfare) or certain sectorial interventions and can be reported in terms of LU supported. As regards attribution of relevant interventions to R36 and R38 ("disaggregation"), see answers to previous questions</p>
<p>O.16: It is not clear that the output indicator should be under the category “coupled support” as this is not support for production. This would suggest that such support is based on the number of animals subject to the support. However, this is probably not the case. Would the number of farms supported be a better measure?</p>	<p>O.16 does not refer to coupled support, but to support to animal-related management commitments (e.g. in relation to animal welfare). We think that LU is an appropriate measurement unit for this type of interventions.</p>
<p>O.17: Made clear payment in a given year is needed for a project to be counted. The basis for this support seems to be article 65 (“environmental, climate and other management commitments”) Therefore it should be clear that an investment project supported related to a management commitment supporting genetic resources, is not to be included in the output indicator.</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. Indeed, this indicator refers to management commitments, and not to investments.</p>
<p>O. 18: Please confirm if forest investments are included here. In a</p>	<p>The indicator refers to “on-farm” investments. Logically, investments for forest</p>

<p>general way, it should detailed which one of all the various possible types of investments under the provisions of Article 68 (“Investments”) should be registered by this indicator. Please, confirm that this indicators comprises the number of projects even when several projects are carried out within the same farm. In order to calculate result indicator R23 this indicator needs to be disaggregated by themes. It could also be needed to know the number of persons concerned by certain investments or infrastructures for calculating R34.</p>	<p>development, processing and marketing, infrastructures, etc. should not be counted under this indicator. However, an investment in afforestation of a certain agricultural area of a given farm could be counted.</p> <p>There is no need, no possibility and therefore no intention to detail all possible interventions under article 68 and to attribute them to specific output indicators. This would be contrary to the principles of the new delivery system, and would introduce unnecessary rigidities.</p> <p>As for the attribution of interventions to result indicators (“disaggregation”), see answers to previous questions</p>
<p>O. 18: Investment support for farms can also happen in relation to operational plans of producer organisations. It is made clear that these investments are not to be counted. Also the number of investments itself is difficult to count as this depends on the definition on what an investment is. For instance, should an investment project by a farmer for solar panels on the roof of his barn and an investment in equipment for precision farming counted as one or two investments? On-farm is not clearly defined, this is especially important when differentiating with O.21. For O.18 to O.21: why is this breakdown relevant, it is not directly related to result indicators</p>	<p>Relevant investment-related interventions under sectorial programmes (e.g. under Art. 43(1)(a), 43(2)(b), 52(1)(b) and (e), 60(1)(a) and (2)(b)) should be counted under this output indicator.</p> <p>Reference to "investments" should be understood as "investment projects", i.e. each supported investment project will count once.</p> <p>"On farm" qualifies investment projects that are done at the level of an agricultural holding.</p> <p>The (minimalistic) breakdown of investment interventions through output indicators O.18 to O.21 aims at facilitating the design of homogeneous interventions.</p>
<p>O. 18 Number of supported on-farm productive investments: It is not clear how to count the projects, which are more complex and cover more investments at once (i.e. planting of the fruit grove including purchase of the drop irrigation system). The monitoring of these projects may be more complicated. The indicator “number of supported operations aimed at on-farm productive investments” should be used instead.</p>	<p>See answer to previous question.</p>
<p>O.19 Number of supported local infrastructures What is understood by “local”? Currently infrastructures at regional level are taken into account. I would be positive to differentiate what is included in this</p>	<p>The word "local" qualifies the usual dimension of infrastructures funded through EAFRD. All infrastructures eligible under art 68 (taking into account limitations foreseen in article 68(3)(g)) can be counted under this indicator. Infrastructures funded through LEADER will</p>

<p>indicator and what is included in the calculation of O.21. Please clarify if it affects only to LEADER or also to the current M07. In order to calculate R34 number of persons concerned by certain investments or infrastructures may be needed.</p>	<p>not be part of this indicator. The relevant output indicator for LEADER is O.27 "number of local development strategies"</p>
<p>O.19 Number of supported local infrastructures The number of local infrastructures is difficult to count, the number of projects is better defined. Local is deleted as this is an extra constraint that is not found in the article 68(3)(9)</p>	<p>Comment noted. As regards the wording "local", see previous answer</p>

<p>O.20 The number of investments is difficult to count, it should be clear that non-productive investments in case of operational plans or leader local development strategies are not to be counted.</p>	<p>Comment noted. As regards possible non-productive investments implemented within LEADER strategies, please see answer on O.19. Non-productive investments realised within Operational Programmes are meant to be counted under this indicator.</p>
<p>O.20 and O.21: It is needed to clarify the current wording of O20 and O21. The temporal scope creates some doubts for multiannual projects that receive payments during several years. It should be made clear that only investments paid during the financial year have to be counted</p>	<p>Drafting suggestions noted. Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. The reporting period for all indicators is the financial year. Please also note that in the context of the clearance of accounts investments linked to partial payments will be counted partially (further clarification will be provided in the context of discussions on clearance of accounts)</p>
<p>O.20 and O.21: O.20 Number of supported non-productive investments and O.21 Number of off-farm productive investments: Indicator “number of supported operations....” should be used instead.</p>	<p>Comment and drafting suggestion noted</p>
<p>O.21: The number of investments is difficult to count, it should be clear that productive investments in case of operational plans or leader local development strategies are not to be counted. Off-farm is not clearly defined, this is especially important when differentiating with O.18.</p>	<p>Comments noted. As regards LEADER, see answer given for O.19. Off-farms investments realised within Operational Programmes are meant to be counted under this indicator. Off-farm means outside of an agricultural holding.</p>
<p>O.22: O.22 and O.23 are referring to the support in article 69. However, the support in article 69 is not divided in the way the two output indicators suggest. The three categories are: Young farmers new farms/forestry activity or farm/forestry diversification business startup of non-agricultural activities when linked to local development strategies</p>	<p>It is confirmed that the third category under art 69 (“business start-up of non-agricultural activities when linked to local development strategies”) is linked to the implementation of LEADER strategies. The output indicator to be used for LEADER refer to the (number of) Local Development Strategies as a whole (also see answer to O.19) Drafting suggestions are noted</p>

<p>The draft is tailored to de idea that the first two are what is counted for output, as the third point is part of LEADER. Since the support concerns not only young farmers but also rural business start-ups the text should be adapted.</p> <p>Drafting suggestion O.22 Number of farmers beneficiaries receiving installation grants support paid on the basis of article 69 (2)(a) in financial year N.</p>	
<p>O.23: In order to calculate, at least, result indicator R32 this indicator needs to be desegregated by themes (bioeconomy projects)</p>	<p>Concerning the issue of “disaggregation”, see answers to previous similar questions</p>
<p>O.23: Rural entrepreneurs is ill defined, the drafting suggestion makes clear it is the second option that is counted with this output indicator</p> <p>Drafting suggestion: O.23 Number of rural entrepreneurs beneficiaries receiving installation grants support paid on the basis of article 69 (2)(b) in financial year N.</p>	<p>Drafting suggestion is noted</p>
<p>O.24 Problem here is that producer organisations are also supported in the GMO interventions. In the regulation it is not clear that these producer groups (getting GMO support) are eligible for support under article 71, but it seems clear that we should not count support under the GMO as support for producer organisations financed with GMO funds.</p>	<p>O.24 is meant to refer to all interventions supporting producer organisation under the rural development type of intervention “cooperation” (art. 70). NB: support provided through sectorial programmes will have to be counted under O.33 and not under this indicator</p>
<p>O.25 Number of farmers receiving support to participate in EU quality schemes Please clarify which one of the three identify types of support must be taken into account here: coupled income support, sectoral payments and quality schemes under rural development payments.</p>	<p>O.25 is meant to refer to relevant interventions supported under the type of operation “cooperation” (art. 70), as well as under sectorial programmes (e.g. in art. 43(1)(m), 60(1)(g)). Besides, coupled income support (CIS) aims at supporting sectors or types of farming therein that are in difficulty(ies). Its objective is to address this(ese) difficulty(ies) by</p>

	improving, inter alia, the quality of these sectors or types of farming. CIS cannot be seen as an “EU quality scheme”, which has a very specific meaning, even if the aim or the difficulty (or both) can be related to quality. Therefore coupled support is excluded
O.25 Number of farmers receiving support to participate in EU quality schemes EU quality schemes also might be supported via the GMO. It should be clear only farmers getting support under the cooperation article are to be counted	See previous answer

<p>O.26 Number of generational renewal projects (young/non-young farmers) Please confirm if it refers to provisions of Article 71.7</p>	<p>Yes but not exclusively. Other forms of cooperation projects young/non-young (i.e. going beyond farm succession) can also be considered here</p>
<p>O.26 Number of generational renewal projects (young/non-young farmers) Generational renewal removed as in would seem to indicate an extra condition, (which is part of article 71(7)). Made clear that installation support is not to be counted Drafting suggestion: O.26 Number of generational renewal projects (young/non-young farmers) paid on the basis of article 71(7) in financial year N</p>	<p>Drafting suggestion noted. Also see answer to previous question. Installation support is not a young/non-young project, by definition.</p>
<p>O.27 Number of local development strategies (LEADER) Although it is a clear indicator, it should be considered that only when CLLD strategies are approved this indicator will be stable. Therefore it would be of no use to assess the monitoring of the implementation of LEADER. It could be replace for the number of project supported.</p>	<p>Indeed, this indicator is proposed for the purpose of the performance clearance, not for assessing the implementation of LEADER The proposed replacement would not permit the clearance of LEADER expenditure (see replies to questions on O19)</p>
<p>O.27 Number of local development strategies (LEADER) On basis of the CPR article 25 it would be necessary to make clear that only local development strategies where the lead fund is EAFRD. Also it is not clear why we want to count strategies and not leader groups as the indicator is presented as one of cooperation. This would mean we cannot count a leader group in the process of making their strategy, while this activity can be funded. Therefore changed to LAG.</p>	<p>This indicator will have to be quantified also in relation to CLLD strategies where EAFRD is not the leading fund The “cooperation” nature of LEADER is implicitly linked to the fact that LEADER is implemented trough a partnership of public, private and civil society actors (partnership). Note is taken of the comment that preparatory work for developing LEADER strategies are not covered by any output indicators in Annex 1, as well as on the drafting suggestion (replacing “number of strategies” by “number of LAGs”). However, please note that changing the indicator from “number of strategies” to “number of LAGs” would not allow for counting preparatory support either: a partnership receives preparatory support to develop its strategy and only once this partnership is selected this is officially a local development strategy and a LAG</p>
<p>O.28 Number of other cooperation groups (excluding EIP reported under O.1) Please detail thoroughly if it comprises all the possible groups established under the provisions of Article 71, excluding EIP</p>	<p>Indicator O.28 includes any possible cooperation groups supported through the CAP plan under art 71 beyond EIP groups and those groups explicitly mentioned and counted under output indicators O.24 to O.27 , (i.e. it does <u>not</u> include producer</p>

groups.	groups/organisations, quality schemes, generational renewal projects and LEADER)
<p>O.28 Number of other cooperation groups. This would be a impact indicator counting all groups paid under article 71 except EIP groups. This is overlapping with O.24, O25, O.26 and O.27.</p>	<p>O.28 has not the nature of an impact indicator. Indicator O.28 includes any possible cooperation groups supported through the CAP plan under art 71 beyond EIP groups and those groups explicitly mentioned and counted under output indicators O.24 to O.27 , (i.e. it does <u>not</u> include producer groups/organisations, quality schemes, generational renewal projects and LEADER)</p>
<p>O.29 Number of farmers trained/given advice Concerning double counting, please clarify if the number of participants in a training process has to be taken into account here. As one farmer can participate in several training processes, then he/she would be double counted. If the indicator refers to unique numbers (unique attendees), one ID number should be counted only once, regardless the number of processes he/she has attended. In practical terms, double counting is more convenient since calculations are simpler. In order to calculate result indicator R24, this indicator needs to be desegregated by subject /themes of advisory.</p>	<p>Farmers participating in more than one training course should be counted once (i.e. no double counting of the same farmer) Comment on complication in the calculation is noted. As regards “disaggregation”, see answers to previous similar questions</p>
<p>O.29 Number of farmers trained/given advice In our view this concerns support under article 72. It should be clear it is not advice given under the farm advisory service if no support is given (article 13) or such actions under operational programs. The second part (given advice) can be read as users of the farm advisory service (article 13). In our country this service is supplied by private parties who have the advisors to give this service. The service is not publicly funded. The paying agency has no direct knowledge about the amount of farmers using the system</p>	<p>O.29 refers to the number of farmers who have received training/advice in the context of activities supported under the CAP Strategic Plan (e.g. under articles 72, art 43(1)(p), 43(1)(o), 60(1)(b), 60(1)(c), etc.)</p>
<p>O.30 See O29</p>	<p>See previous answer</p>
<p>O.31 Number of ha under environmental practices (synthesis indicator on physical area covered by conditionality, ELS, AECM, forestry measures, organic farming)</p>	<p>The reference to “physical area” is indeed meant to avoid double counting. I.e., if a certain hectare is concerned by more than one commitment, it has to be counted only once</p>

<p>Please clarify if double counting is foreseen within this indicator. For period 2014-2020 a distinction is made between physical/real area and total area. Total area: when the same hectare is covered by several commitments, it is counted for each type of commitment (double counting).</p> <p>Physical/real area: when the same hectare is covered by various commitments, it is counted only once. In this way, the indicator provides a real picture of the regional area that is covered by any agri-environmental commitment.</p>	
<p>O.31 Number of ha under environmental practices.</p> <p>This is a synthesis indicator. The area covered by conditionality is O.4 (land subject to conditionality because all land that gets direct uncoupled income support is subject to conditionality) and O.32 overlaps related to specific GAEC practices (see comment on O.32) AECM is O.13 and is a subset of O.4, with the exception of land under AECM tilled by non-farmers. This means land is double counted in this indicator. ECO-schemes is a subset of O.4, so also can lead to double counting. O.14 is forestry measures and O.15 is organic farming which is also a subset of O.4.</p> <p>It is probably the wish to make an indicator on the total of area supported with environmental practices. On this basis the indicator only makes sense if it is clear which specific GAEC are to be counted for conditionality and how to avoid double counting. Else the indicator will just give as result the total agricultural area for direct payments, combined with the area of forestry support, or even a greater area when double counting is not avoided. More in general. We do not see the need for a synthesis indicator of this kind when indicators for the individual practices are available and double counting is unavoidable as some practises are combined on agricultural area (for instance organic farming and conditionality).</p>	<p>This indicator is meant to be calculated in terms of physical area” (i.e. no double counting, see previous reply).</p> <p>Note is taken of all other comments</p>

<p>O.31 refers to “ELS”, which are not defined in the text. Assumedly, this refers to eco-schemes. The wording should therefore be corrected accordingly</p>	<p>ELS stands for “Entry Level Schemes”, it should be read as “eco-schemes” Request for correction noted</p>
<p>O.31 The legal meaning of “synthesis indicator” needs to be clarified.</p>	<p>The term “synthesis indicator” means that this indicator include a synthesis (i.e. “aggregation”) of both conditionality areas and different types of interventions with focus on environment, in order to calculate the physical area (without double counting, see previous reply) where all these interventions are applied.</p>
<p>O.31 and O.32 Usually these types of indicators will lead to multiple calculation of one parcel. Is this what the Commission wants?</p>	<p>Concerning O.31 see previous answers for this indicator As regards O.32 (area subject to conditionality) double counting will have to be avoided as regards the aggregated figure. Concerning the break-down, each hectare covered by more than one GAEC will have to be counted once for each corresponding GAEC (in this respect the sum of the hectares covered by each GAEC will not correspond to the total area covered by the aggregated figure provided in this same indicator).</p>
<p>O.32 This indicator has at most 10 sub indicators. For GAEC 1, 2, 4, 6, 7, 8, 9 and 10 it is possible to relate them to specific areas (probably combining GAEC 1, 2 and 10, GAEC 4 and 9.) However it is not clear that these would be output indicators as these are the result of O.4 We do not see that GAEC 3 and 5 are area specific so it is unclear how to relate area to these GAEC. GAEC 5 could be related to the number of farmers using the nutrient management tool in a specific year, GAEC 3 is not related to any action on a specific area so would presumably return the same value as O.4.</p>	<p>As regards disaggregation, see previous reply. O.4 will cover the overall area subject to decoupled direct payments, while this indicator focuses on the specific area covered by each GAEC (e.g. the buffer strips area for GAEC 4 and the area covered by non-productive features for GAEC 9). Concerning GAEC 3, this refers to the whole arable land of beneficiaries covered by conditionality in the MS Concerning GAEC 5 this concerns the whole area of beneficiaries covered by conditionality in the MS Note is taken of the other comments.</p>
<p>O.32 Reporting details of conditionality will be very challenging, even impossible</p>	<p>Reporting is necessary to allow monitoring of the practices in light of the strengthened environmental and climate ambition of the new delivery model. For example, the monitoring of the share of non-productive features can only be done if such information is provided by Member States. For this purpose it should be noted that Member States have already a significant experience based on EFA (Ecological Focus Area) where there is a regular annual notification.</p>
<p>O.33</p>	<p>Indeed, this indicator aims at identifying the number of producer organisations operating</p>

The setting up of an operational fund does not seem to be the a relevant criterion, but the number of producer organisations operating an operational fund/program supported by the CAP budgets seems more relevant as an output indicator.

(i.e. setting up) an operational fund/program supported by the CAP budget. Hence, COM does not see a substantive difference between current language and the aim underscored by MS.

<p>O.34 Should this not be sector specific and specifically exclude promotion campaigns direct funded by the European Commission (as these have not relation to the paying agency)</p>	<p>The indicator only refers to activities funded under the CAP Strategic Plan e.g. through POs' Operational Programs and/or in the context of other sectoral interventions. Hence, promotion campaigns directly or indirectly funded through other CAP instrument are excluded.</p>
<p>O.34 Number of promotion and information actions, and market monitoring: what kind of data shall be reported as regarding the "market monitoring"? We need more clarification on this indicator.</p>	<p>Drafting suggestion is noted.</p>
<p>O.35 Why is this sector specifically included and no other sectors.</p>	<p>The emphasis on beekeeping actions reflects the environmental/climate change ambition of the CAP proposals where beekeeping plays a decisive role in sustainability. It is necessary for the performance clearance of beekeeping specific actions under sectoral programmes. The other sectoral programmes actions are to be reported under relevant interventions (investments, etc.).</p>
<p><u>Result indicators:</u> In the same way that for output indicators, it is needed to avoid ambiguity and improve the definition details of each indicator. It is not clear with which interventions or output indicators the result indicators are related to. Although Member States are given flexibility to establish the links among result indicators, interventions and output, it would be advisable that the COM would establish a proposal for the establishment of these links. It would help to have a better understanding of result indicators, to define them precisely and to guarantee that all necessary execution data are collected. We understand that for a precise definition of the result indicator it must be linked beforehand to output indicators and type of operations (even if this is an open list, flexible and not exhaustive). In order to do that, we think that the model used for the period 2014-2020, that set a link between the result indicators and the output indicators and context indicators that allowed to calculate them, would be useful.</p>	<p>Methodological clarification concerning the calculation of indicators will also be provided in line with article 120 CSP Regulation. The attribution of interventions to relevant result indicator(s) will depend on the specific design of the interventions. Further details of likely/expected links will be provided in the indicator fiches. Output indicators will be used mainly for the purpose of the performance clearance. Therefore they generally reflect what is immediately generated by an intervention (what "is paid for"). Result indicators have been defined for the purpose of the performance review. Therefore they tend to reflect the purpose of the interventions. This is why there is not always a direct transposition of output indicators into result indicators, and why certain result indicators will indeed require the collection of data which is not already specified in an output indicator Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. Proposal for re-drafting is noted. Note is taken on comments on R.15 and R.16</p>

<p>Some result indicators are based on outputs that are not collected by any of the output indicators included in the proposal for a regulation. It is necessary to identify and define ALL the indicators/disaggregation of output indicators that would be needed in order to calculate the result indicators.</p> <p>It is necessary to define the temporal scope: annual or cumulative thorough the programming period.</p> <p>Several indicators are expressed in terms of “total number of farmers. Official and standard statistics usually provide the figures for farm holders or farms, but not for farmerstherefore it is more precise and consistent to use these concepts: farm holders, farms, instead of number of farmers.</p> <p>Only indicators that can be easily and directly calculated must be considered. This means to discard, for instance, R16, that is not easy nor of direct calculation. The same applies for R15 if it measured in MW.</p>	
<p>We have doubts whether the result indicators are genuine result indicators? The indicators proposed may be measurable, but in various cases do not seem to be a useful predictor of the desired impact.</p>	<p>Result indicators are meant to monitor the progress in the implementation of the interventions/plans. They reflect the purpose of the different interventions, are used in the context of the performance review and have to be reported annually. Attribution of interventions/operations to certain result indicators will be evidence-based. The assessment of impacts is done through evaluations, with the support of impact indicators. The latter are outside the scope of the performance review and related annual reporting</p>
<p>Many result indicators are based on shares. Shares of land, shares of farmers etc. In several cases a quantitative share does not indicate the real improvement in view of the objectives, since qualitative improvements are not being measured. It could well be that the share of participants in AECM or the share of land under commitments is stable or declining, while in reality the result or impact is nevertheless increasing simply because substantive qualitative improvement is being realised despite a stable or declining quantitative share.</p>	<p>Result indicators are meant to monitor progress in the implementation of the planned interventions towards pre-established milestones and targets. They are not meant to assess impacts. The latter is the task of evaluation, also based on qualitative considerations.</p> <p>Operational targets established in the plans should be checked and where relevant can be adjusted as a result of evaluations, e.g. based on considerations such as the ones referred to in the question</p>

<p>The proposed indicators do not yet match sufficiently with current AECM measures in our country as regards the environment, biodiversity, landscape and climate, among others through farmers' collectives. The future CAP should cater for this better than today, both under eco-schemes and AECM. This requires flexibility for fine-tuning of output and result indicators according to national, regional and local needs and practices.</p>	<p>The reference to “fine-tuning of output and result indicators according to national, regional and local needs and practices” is unclear. Common indicators included in Annex 1 have to be applied as such. According to COM, those indicators are suitable to reflect the purpose of the interventions in a comprehensive way.</p>
<p>Additionally, the future CAP should allow action-based targeted payments financed on basis of other outputs than hectares.</p>	<p>Please refer to answers included in previous batches as regards questions on the scope of types of interventions</p>
<p>The result indicators share a possible 1 to N relationship with the 9 specific objectives of article 6. In other words, a result indicator can be used to program the aims of several specific objectives. We have concluded that the connection between the output indicators and result indicators is crucial in this system (intervention strategy). For instance, a EACM measure can have a positive influence for climate change, biodiversity, nitrate emissions, water quality and soil quality. For planning purposes it is necessary to have a way to meaningfully connect the result indicators with different interventions (and corresponding output indicators). We propose to introduce using weighting factors for different interventions similar to the way Ecological Focus Area is calculated, depending on the influence of the specific measure to the specific goal. The member state should weigh the influence of the specific measure and output indicator to the result indicator in their national strategic plan.</p>	<p>Agreement on the fact that result indicators may be referred to more than one specific objective. Also agreement on the fact that one intervention may be relevant for more than one result indicator. Recognition that, in certain cases, a part of the outputs of an intervention (e.g. corresponding to certain commitments under an AEMC intervention) could be attributed to one result indicator or group of result indicators, while another part of the outputs of the same intervention (e.g. other commitments under the same agri-environmental-climate management commitment intervention) could be attributed to another result indicator. However, COM is of the opinion that the introduction of weighting factors would greatly increase complexity in the management of indicators, while having limited analytical value given the high degree of arbitrariness in creating such weighting factors. Instead, as set out in the indicator fiches, individual operations, or groups of operations (as in the case of agri-environment commitments) within an intervention may be attributed to different result indicators.</p>
<p>It should be clear that result indicators are cumulative or yearly. This is very important for target setting. This means that in the definitions of result indicators it should be clear what the conditions are for an indicator to be counted in a specific year. If yearly, in our view result indicators are reported on the basis of the financial year (art. 121 cap strategic plan regulation).</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. Such clarification will specify which result indicators are cumulative and which are not (only the yearly value to be provided). It is confirmed that the reporting period for all indicators is the financial year.</p>

<p>Against what total number should the share/percentage be calculated? The total indicator to calculate the result indicators shall be defined in the basic legislative act</p>	<p>Context indicators from EUROSTAT may generally serve as denominators for result indicators expressed as ratios. Further methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation</p>
<p>Some of the result indicators use the term “farms” and some “farmers”. Is it on purpose? What is the intention? What are the baseline indicators?</p>	<p>Differentiation between “farmers” and “farms” across result indicators was intended to reflect the scope and purpose of the indicator. Concerning baseline, see answer to previous question</p>
<p>We would like to propose a special provision for LEADER - LEADER result indicators should be programmed in the CAP Strategic Plan once the Local Development Strategies (LDS) have been selected. The CAP Strategic Plan targets and milestones should reflect the targets and milestones in the LDSs. This approach would enhance the performance framework and encourage Local Action Groups (LAGs) to adopt the New Delivery Model. In addition, This approach would not impact the selection of an appropriate output indicator (e.g O.27) since the number of LAG areas would be determined at national level. Requiring the LEADER specific result indicators to be programmed before the selection of LDS would be imposing top down targets on the Community Led Local Development (CLLD) approach. We need to protect the CLLD approach and allow LEADER result indicators to be programmed in the CAP Strategic Plan after the LDSs are selected.</p>	<p>Expected contributions by LEADER strategies to relevant result indicators will have to be anticipated by Managing Authorities, based on their knowledge of territorial needs of the areas covered by LAGs, as well as on lessons learnt. Values of relevant result indicators may be adjusted after the approval of Local Development Strategies</p>
<p>R1: It is necessary to detail which interventions are associated with this indicator to ensure that the output indicators are counting the number of farmers participating in these interventions. Confirm whether sectoral aid must be taken into account for this indicator. With regard to Article 72, the indicator says "farmers". What about forest holders and rural entrepreneurs? Please clarify which denominator should be used: context indicators show the number of farms, not the number of farmers. What denominator is taken? If we include the entire rural population, the percentage will be very small. The denominator "number of genuine farmers" according to the definition, can be an</p>	<p>R1 refers to any interventions supported under the CAP Strategic Plans in the fields of advice, training, knowledge exchange or participation in operational groups, including actions under sectorial operational programmes. The indicator only refers to “farmers”. Therefore, forest holders and rural entrepreneurs will not have to be counted. Redrafting proposal is noted. However, the intention was not to consider the total rural population as denominator</p>

interesting option for limiting.	
R1: Why only farmers? Also other beneficiaries should be taken into account	It was indeed decided to limit the scope of this indicator to farmers (beekeeper being assimilated to farmers) as they are expected to be the most prominent beneficiaries of training activities Comment is noted.
R1: 1. It should be clear it is the share of genuine farmers (CAP definition) (because then the number can be based on the register of farmers.) If farmers is broadly means al farmers who fulfil the definition of article 3 (a) of the CAP strategic plan regulation the question becomes how this number shall be collected by the Paying Agency as not all farmers in this definition will ask for any support under the CAP (and multiple farmers can be part of a genuine farmer). The alternative is that EUROSTAT definition for farmers is used and the published number form EUROSTAT for each member state (but this could be difficult to be applied in MS with more than one CAP plan as only the farmers in the region which concerns the CAP plan that is reported upon should be considered). 2. Why is only participation in operational groups counted, not other types of cooperation with the stated goals? 3. Do farmers need to be paid in order to be counted for this result or is for instance participation for free in a workshop that is organised with CAP funding enough. 4. A farmer can participate in an operational group and receive support for training. Do we count this as one farmer or two? 5. In this measurement qualitatively very different quantities are counted together: A farmer participating in an EIP group has a lot more impact for innovation when compared to a farmer getting a half a day course on soil management. This result indicator does not measure the quality of the results and does not differentiate between sharing of knowledge and	This indicator is not meant to be limited to “genuine farmers”, but also include farmers not falling in this category but benefitting from training advice activities supported through the plan. Indicators of the (national) CAP Strategic plans are to be provided at national level, for which reliable statistics on the number of farmers are expected to be available The scope of the indicator is not limited to EIP. Farmers benefitting in whatever form from training/advice activities funded through the plan will have to be counted under this indicator Each farmer has to be counted only once under this indicator This indicator is not meant to assess the quality of advice/training and its impact (this is left to evaluation activities). The proposal to split the indicator is noted. Also see previous answer under point 3

<p>innovation. We would suggest splitting this indicator between cooperation for innovation and education. We also feel that for education it is not that relevant that farmers are the beneficiary, so change to beneficiary's of the support targeted at knowledge transfer. Should actions paid for by producer organisations paid for by operational programs also be included in this result indicator?</p>	
<p>R2: Please clarify which denominator should be used: for context indicators it used the number of farms, not the number of farmers. The denominator "number of genuine farmers" according to the definition, can be an interesting option for limiting.</p>	<p>Point on the remarks concerning the use of "farmers" as denominator and the suitability to replace it by "farms". The number of "genuine farmers" is not available in statistics.</p>
<p>R2: It is not clear whether this indicator is in absolute figures or percentage.</p>	<p>This indicator is intended to be expressed as a ratio, expressed as the number of advisors integrated in AKIS compared to the number of farmers</p>
<p>R1-R3: Why only farmers are taken into account? These indicators describe the modernisation of agriculture. Issues should be addressed more broadly, in line with the specific objective (agriculture and rural areas).</p>	<p>A choice was made to limit the scope of this indicator to farmers as they are expected to play a prominent role in terms of benefitting from advice/training (also see previous answers) Comment is noted</p>
<p>R2: Result indicator are understood to be resultants of different output indicators in the way the Commission has described the working of the system. This seems not to be the case with this result indicator. It is unclear how programming interventions can influence this indicator. The number of advisors in the AKIS system is directly related to the way the members state defines it's AKIS system. The AKIS system is described in article 13 of the CAP strategic plan regulation: "They shall be integrated within the interrelated services of farm advisors, researchers, farmer organisations and other relevant stakeholders that form the Agricultural Knowledge and Innovation Systems (AKIS)." According to article 102 the strategic cap plan will contain "a description of the organisational set-up of the</p>	<p>The number of advisors to be considered here are the ones quantified in O2, i.e. supported with the CAP. Please refer to replies provided in relation to that indicator for further explanations . As regards the references to "farmers" and "farms", note is taken.</p>

<p>AKIS designed as the combined organisation and knowledge flows between persons, organisations and institutions who use and produce knowledge for agriculture and interrelated fields;” This means that knowledge institutions and other kind of organisations are also part of the AKIS system. When is an employee of an organisation or institution an advisor for the purpose of this indicator? Do we count only advisors who have actually participated in giving advice financed with CAP money? And if not, how does the number of advisors relate to a result of the CAP interventions. Do we base the number of advisors on output indicator O.2? (or a similar way of counting for actions in which AKIS advisors are involved. (this means that the paying agency has the obligation to count the number of advisors even when there is no output indicator related to this). What does “(compared to total number of farmers)” mean? If we really want to count the advisors within AKIS every year even if they have given no advice within a project that is subsidized, a survey is the only feasible way to establish the number of advisors. Keep in mind that the FAS part in our country is not subsidized, so a lot of advisors are giving advice to farmers without any CAP involvement. Number of farmers in itself is also a problem, because most of the CAP support is generally given to farms and from a standpoint of methodology it is not clear why sometimes is chosen to count farmers, farms of beneficiaries. In this case knowledge is normally transferred to farms to have any benefit. Also, using the definition of genuine farmers will result in the number of farms and farmers being equal This result indicator should be split between innovation and knowledge transfers</p>	
<p>R3: We request clarification concerning the interventions that are related to a more detailed definition of the term: “support precision farming technology”. If a farmer receives advice on this subject, could he/she be considered as a beneficiary? Output indicators are needed since they are not included now in the proposal.</p>	<p>Beneficiaries of support for precision farming technology, in whatever form (including training), can be counted within this indicator.</p>

<p>R3: How should “benefitting” be interpreted? In our country the Paying agency makes it possible to use the LPIS system for precision farming (data link with precision farming management programs and the LPIS system). Is this support for precision farming through CAP? It seems more appropriate to make clear the types of support that are counted in this result indicator. We would need a definition of precision farming in order to look at the different projects and see if the right subject matter is addressed. An impact indicator could be the percentage of farmers using precision farming methods. This would be better than this result indicator.</p>	<p>“benefitting” has to be interpreted as “receiving financial support through CAP Plan interventions “. Also see previous reply. “Precision farming” is a well-established scientific concept. COM does not intend to provide a definition. Member States are expected to apply this concept in their specific contexts. Note is taken on the suggestion for a possible impact indicator. However, such indicator could only complement (and not replace) the R3 indicator, given the different functions of result and impact indicators (see previous explanations in this respect)</p>
<p>R3: Why is only precision farming mentioned here? The uptake of other new technologies should also be taken into account, precision farming could be one of these?</p>	<p>Note is taken of the comment. However, it was intended to keep the focus and scope of this indicator only on precision farming.</p>
<p>R3: Digitising agriculture: Based on what data should this indicator be measured and what should be covered here? What is the connection to the strategy for the development of digital technologies mentioned in Art. 102 (b)? Digitalisation is a cross-cutting issue that cannot be attributed directly to an intervention. Subject to further explanations, we propose to delete this indicator.</p>	<p>This indicator should refer to all farmers having benefitted from support from the CAP Plan interventions in relation to precision farming It is up to each MS to explain the possible role of this (kind of support and) indicator in the context of the strategy for the development of digital technologies mentioned in art 102(b) There is no intention to attribute the digitisation strategy to only one intervention</p>
<p>R4: According to Article 12 of the proposal, all agricultural areas on the holding, including those no longer used for production, must be maintained in good agricultural and environmental condition. In other words, they must comply with cross-compliance. Please clarify whether the calculation will have to be made with respect to UAA or not, given the fact that area not used for production also has to comply with cross-compliance.</p>	<p>For the numerator: this indicator relates to area covered by income support, so the hectares counted would be limited to those benefiting from income support (and which are subject to conditionality). For the denominator: As clearly indicated in the formulation of this indicator, only UAA is under the scope of this indicator Statistical surveys conducted by the MS sometimes exclude some small beneficiaries that are below the survey hectare threshold. This could result in a share of UAA that is higher than 100%.</p>

<p>R4: UAA is a EUROSTAT defined statistical entity in the Farm Structure Survey. This data is renewed every 10 years as a census and every 3 to 4 years as a sample survey.</p> <p>It should be clear if the data of the latest census is to be used, or the latest survey.</p> <p>Income support is not clearly defined. Because of the sentence “...and subject to conditionality” it is unclear if support under articles 65, 66 and 67 of the CAP strategic plan regulation are to be included. This would be strange as for instance agro-environment commitments are paid on the basis of income foregone and costs incurred and are generally not seen as part of direct income support. However you still can see this as income support (in WTO terms). It is probably (because of the linked output indicators) direct income support that is meant in this indicator.</p> <p>In our suggestion for drafting we have erased the part “and subject to conditionality”. All direct income support of chapter 2 of title III is subject to conditionality according to article 11.</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. In this case the UAA in Eurostat annual land use survey is to be used.</p> <p>Only support under art 66 and 67 is intended to be considered under this indicator as they are assimilated to income support.</p> <p>Note is taken of drafting suggestion. However, we deem important to highlight that all areas subject to income support is subject to conditionality requirements.</p>
<p>R5: Please clarify whether it is correct to request it per holding or per farmer. It seems to be calculated as the ratio between O.8 and total farms, but O.8 refers to "farmers" covered by risk management instruments, not farms. All other indicators refer to the number of farmers.</p>	<p>The indicator refers to farms as defined in Eurostat surveys (and this is the intention)</p>
<p>R5: It should be made clear whether this means tools referred to in Article 70 or other CAP tools that contribute to risk management?</p>	<p>The indicator refers to all risk management tools supported through all relevant CAP Plan interventions (e.g. under art 70 or sectorial programmes)</p>
<p>R5: Risk management: Since the process of setting up the risk management instrument is quite complex, it is not possible to predict the yearly indicator value at the time of submitting the CAP strategic plan to the COM</p>	<p>Annual milestones will have to be established based on plausible assumptions and lessons learnt from previous programming periods</p>

<p>R6: we would appreciate a comprehensive definition: what is considered as additional support? Please clarify if it is linked to the provisions of Articles 15 or 26, if it related to capping and if “average farm size” refers to the economic dimension.</p>	<p>This indicator represents the average additional income support granted per hectare to farms below average farm size, compared to the average income support per hectare for the entire population of eligible farms.</p> <p>The income support to be considered here is the total of direct payments, in order to reflect the extent of the redistribution of direct payments towards smaller farms expected from the reform.</p> <p>By taking the net direct payments amounts (including CRISS (article 26), but also all other DPs) granted to beneficiaries (both below average farm size and total), the reductions (article 15) are taken automatically into account.</p> <p>More detailed information should be provided to MS through indicator fiches.</p>
<p>R6: This indicator is targeted at the result of the redistributive payment. However the formulation of this indicator is very unclear. It would seem to introduce an extra condition for inclusion in the indicator (“below average farm size”) while according to article 26 (2) “redistribution of support from bigger to smaller or medium-sized farms” is possible. Medium sized farms might be of average farm size. It is also unclear what the clause in parentheses “(compared to average)” relates to. What average should be used if a member state uses the option of article 18(2)3 Also, this indicator suggest two output indicators: the number of small farms receiving additional support and the number of hectares concerned. We do not see that this is an indicator that is suitable for setting targets.</p>	<p>As mentioned in the previous question, this indicator would be based on the average direct payments paid per hectare (in the corresponding financial year), comparing 2 groups of DP beneficiaries: farms below the average farm size and the total of farms. The average farm size can be calculated based on the farm size of DP beneficiaries. This indicator does not imply that the CRISS should stop at the hectare threshold corresponding to the average farm size.</p> <p>Further methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation</p>
<p>R6: Redistribution to smaller farms: Farms below average are mentioned here. Medium-sized farms should also be taken into account because redistributive support can be granted to small and medium-sized farms.</p>	<p>See previous two replies</p>
<p>R7: The definition of “areas with higher needs” is needed. Is this an indicator that might be different in each Member State? Does it refers to 'areas with specific needs' or 'areas with higher needs'? What is considered as additional aid? Is it the aid referred to in Article 67? Can</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation.</p> <p>This indicator intends to compare the income support provided in areas with higher needs to the average income support. It concerns all income support (therefore including coupled payments) provided to farmers located in ANC and Natura 2000 areas and</p>

<p>Member States define these areas? Is this aid additional to the aid under provisions of Article 26? Are they the current areas where the measures of ANC, Natura2000 and WFD are applied?</p> <p>Aid for sheep and goat in high mountain areas seem to fit into the title of the indicator but they are paid per LU - how do they fit into this indicator measured per hectare?</p>	<p>territories under BISS (article 18(2)) getting higher support than the BISS average.</p>
<p>R8: What are sectors in difficulties? Who is entitled to define them: Member States of the COM? The EAFRD may provide support for quality schemes. Does couple support refer to the support under Chapter III of the proposal or does it mean support related to ...?</p> <p>It is needed again to precise if the indicator refers to farms or to farmers.</p>	<p>This indicator refers to sectors in difficulty as defined by the MS and benefitting from coupled support (in the meaning of articles 29-33). EAFRD support for quality schemes is not intended to be covered under this indicator.</p> <p>The indicator refers to “share of farmers”. Note is taken concerning the possible statistical shortcomings linked to this definition.</p>
<p>R8: Result indicator 8 refers to coupled support for “competitiveness, sustainability or quality”. The word quality can also relate to quality schemes in the rural development measures. It seems clear this indicator should only relate to the direct payments in article 29 of the CAP strategic plan regulation. Also, coupled payments can be given in different sectors and different objectives can apply to a specific sector in need. We would suggest that this result indicator should be reported per supported sector with targets per sector</p>	<p>The indicator only refers to coupled support. EAFRD support for quality schemes is not intended to be covered under this indicator.</p> <p>No breakdown per sector is envisaged since the outputs (number of heads/hectares and number of beneficiaries) will already be provided by intervention.</p>
<p>R9: We need a better definition. It is foreseen that this indicator takes into account the productive investments and indicator R23 does for non-productive? Sectoral support and rural development support are also considered within these indicator? We consider that it would be better to collect the share of farms and not the share of farmers.</p>	<p>All types of investments supported through the CAP plan and targeting restructuring or modernisation of farms can be considered here. Accordingly, non-productive investments are not relevant for this indicator.</p> <p>Suggestion on reformulation is noted</p>

<p>R9: This indicator is difficult to target as there can be real differences in level of modernisation between different agricultural sectors. A sector that is already up to date would have a lower share of participating farmers. A share of farmers participating looking at all the sectors is not that meaningful. Also when investments are part of an operational program it is not clear how we should count the number of farmers involved. Because of this difficulty the result indicator is rewritten specifically targeted at the rural development measure in a specific financial year. It is however doubtful that this a useful result indicator for overall targeting of farm modernisation. (not only is farm modernisation part of operational programs, also support for young farmers might be combined with support for farm modernisation. Innovation support is also part of farm modernisation and is not part of this indicator). Alternatively the cumulative number of farmers that have received investment support during the programming period could be used to set targets</p>	<p>Targets for this indicator should be established in each CAP strategic plan in line with the restructuring and modernisation needs of the Member State concerned. The farmers, as ultimate beneficiary of the support, are to be accounted, including for investments via operational programs. Drafting suggestions are noted This indicator refers to investments. Forms of support other than investments supporting modernisation or innovation (NB: vineyard conversion is included in this concept) are not meant to be captured by this indicator The nature of this indicator lends itself to establish targets in a cumulative way.</p>
<p>R9: Number of farms would be better than farmers</p>	<p>Suggestion on reformulation is noted</p>
<p>R10: We understand that support for both funds (EAGF and EAFRD) is considered for the calculation of this indicator. It is necessary to specify which interventions are linked to this result indicator to ensure that the number of farmers is collected from them through output indicators.</p> <p>Please also clarify the denominator for the calculation: total number of farmers? Which type of farmers and counted in what way?</p>	<p>. Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. The indicator refers to “share of farmers”. Note is taken concerning the possible statistical shortcomings linked to this definition</p>
<p>R10: Some farmers might be part of a producer group or Producer organisation and participate in one or more of the schemes mentioned. It is not clear how we should deal with such an occurrence in this indicator. Do we count a farmer only once, even if he participates in more activities? It is also not clear how this indicator could be meaningful planned for when the output indicators (ie the different interventions the farmer participates in) don't have the same</p>	<p>Each farmer benefitting from several forms of support relevant for this indicator will have to be counted only once under this indicator The planning of the milestones has to be based on the needs analysis, plausible assumptions, and lessons learnt from previous programming periods</p>

<p>implication towards the result indicator, based on the question if the farmer is participating in more than one intervention. In the draft it is made clear the indicator is yearly</p>	
<p>R10: Add SMEs</p>	<p>Suggestion on reformulation is noted. However, the intention here is to focus on “farmers” because the focus of interventions is expected to be on strengthening farmers position in the supply chain</p>
<p>R11: For this indicator it is necessary to make clear that only the sector involved is measured (we do not see how you can meaningful compare share of value between the different sectors). This also implies that the paying agency has data about the value of production by producers not part of a producer organisations or part of a producer organisation without an operational programme. This is not necessarily the case, for instance with producers that have direct contracts with big grocers. What is the direct link of this indicator with Union goals and how can this indicator be influenced by programming of the member state?</p>	<p>The denominator refers indeed to the value of production of the sectors covered by the interventions. It can be available in the Economic Accounts for Agriculture (Eurostat). Should detailed information on the sector concerned not be available in the Economic Accounts, MS shall find other data sources. For the numerator, it refers only to supported actions via Sectoral programmes.</p>
<p>R12: This indicator is only concerned with land based interventions for climate change. For all agricultural area based indicators the share of land should be the same, therefore in the draft het inclusion of UAA. It is not clear how this result indicator relates to R.14, R.17, R18, R.19, R.20, R.21 and E.22as the measures described there also relate to area related interventions for climate change on . As the measures for adaptation for climate change can be very diverse, it is not clear how this share is a meaningful way to program (set targets) for area based measures for climate change. Based on article 87(2) in the view of the commission all areas under conditionality should be financially counted as 40% climate related expenditure with 100% for areas under environment and climate schemes. This would in effect mean that all the agricultural area of farmers participating in direct payments should be counted as land under commitment.</p>	<p>Only area subject to specific <i>commitments that contribute</i> to improve climate adaptation are under the scope of this indicator. Therefore, as regards Direct Payments, only certain interventions under art 28 (eco-schemes) are likely to be relevant for this indicator. In addition, the aim of this result indicator is to measure the coverage of interventions above baseline (conditionality being the baseline). Art 87(2) refers to a methodology for tracking climate expenditure, which is not relevant for quantification of result indicators and their milestones/targets</p>
<p>R13: This result indicator requires to incorporate an output indicator</p>	<p>The calculation of this indicator requires indeed collecting information on the number of</p>

regarding the LU that receive support for the reduction of GHG emissions and/or ammonia, including manure management	LU concerned by relevant interventions contributing to reducing emissions. This information does not need to be reported as a separate output.
R13: Why not have the estimated KG reduced GHG emissions by the measures as an indicator? Estimated Number of reduced KG GHG emissions by measures supported in financial year N.	This would require more complex calculations than the current formulation. The proposed formulation would make more difficult for annual quantification/reporting of this indicator by the Member States.
R13: Reducing emissions in the livestock sector: Does the support within this indicator cover only investments or direct support also? If yes, how should direct support be included here while at the same time avoiding the incentive to downsize the number of livestock units?	This indicator should cover all relevant interventions aiming at reducing emissions in the livestock sector. Further clarifications will be provided in the indicator fiche.
R14: This result counts together commitments with very different impact on carbon retention. Permanent grassland where the farmer is permitted to plow and sow his land every year has a different impact to permanent grassland that is never plowed. It should be clear what the minimum impact is to be counted in this indicator. Why not have an result indicator that counts the expected amount of carbon stored in the soil/biomass as a result indicator?	All first and second pillar management commitments relevant for the scope of the indicator will have to be considered. As all result indicators, R14 is not meant to assess impacts, but to progress in the implementation of relevant interventions of the CAP plan. It is not feasible and therefore not intended to establish “minimum levels of impacts per intervention”.
R14: Carbon storage in soils and biomass: The obligations connected to permanent grassland and peatland are to be a part of conditionality; how should these be included in this indicator?	This indicator refer to “commitments”, which by definition relate to interventions (not conditionality).
R15: Confirm that the measurement unit is Euro and not MW. In the first case the indicator is directly calculated but in the second it is not.	The indicator refers to “investments”. In this case MS will have to collect the capacity of energy production of the supported investments in MW and report it under this result indicator.
R15: If you want to measure the result of investments in renewable energy production the only reasonable measure is the production	See previous reply. Methodological clarification concerning the calculation of indicators will be provided in

<p>capacity of the investment. It should be clear that bio-based is not the same as production of bio-fuel, only energy production on renewable biomass is included</p>	<p>line with article 120 CSP Regulation</p>
<p>R16: The collection of data is difficult for this result indicator. It could be equivalent to the complementary result indicator IRC 14 of the programming period 14-20, that was measured in T.O.E./standard output. If it not possible to establish such equivalence, the indicator should be eliminated since it is not easy nor of direct calculation.</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. A similar calculation methodology as for the complementary result indicator IRC 14 of the programming period 14-20 is indeed intended. Note of the comment is taken</p>
<p>R16: This indicator is totally unclear. As it is a result indicator the result should be achievable with the interventions in the CAP strategic plan. It is not clear what energy savings mean in this context, we need to be careful not to have overlap with R.15. Is it the purpose to measure the usage of more fuel efficient tractors?</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. A similar calculation methodology as for the complementary result indicator IRC 14 of the programming period 14-20 is intended. Note of the comment is taken</p>
<p>R16: Enhance energy efficiency: This indicator should be among the impact indicators. It is not possible to predict the yearly energy savings in agriculture. It depends on the energy audits carried out on each individual farm</p>	<p>Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. A similar calculation methodology as for the complementary result indicator IRC 14 of the programming period 14-20 is intended. Note of the comment is taken</p>
<p>R17: This indicator as stated would count together investments (the creation of woodland) and management of forest (agroforestry). This makes creating a milestone out of this indicator very difficult</p>	<p>This indicator is meant to refer to the area subject to investments in afforestation (new afforested area) or agro-forestry (new agro-forestry area). Accordingly, targets and milestones will have to be defined in hectares</p>
<p>R18: It is not clear what is the meaning of the phrase “under management commitments beneficial for soil management” GAEC 5 is a management commitment aimed to be beneficial for soil management. Should this be counted? If the member state has non-turning tillage as an SMR of GAEC in certain areas, should this be counted? If it is clear that only management commitments of article 65 or comparable are to be counted, it is not clear how it helps to say that</p>	<p>This indicator refers to “management commitments” going beyond conditionality requirements (including GAEC). Area covered by management commitments e.g. under art 28 or 65 beneficial for soil will have to be considered No (see reply under 1.) Indeed the indicator refers only to agricultural land. Comment about the limitation in terms of non-agricultural land under the scope of art 65 is taken Since the unit of measurement of this indicator is hectare, awareness raising activities are not meant to be captured by this indicator</p>

this should be a share of agricultural land. Why not just have the number of hectares under management as a milestone?
Another question is if other types of measures aimed at raising awareness of farmers for soil management leading to better practices but without specific management commitments should be incorporated within the result indicator

<p>R19: For milestone purposes, why is having this as a share of agricultural land helpful/relevant. Also ammonia emissions are also coming from the stables. Why not have a result indicator bases on the amount of reduction of ammonia emissions the measures are supposed to have?</p>	<p>The way in which the indicator is formulated ensures a direct link with the implementation of the interventions, in line with the purpose of result indicators in the CAP plan (see previous replies). A share measures the extent of the coverage of CAP interventions. The proposed reformulation would be more complex for MS to collect the information and report annually on this indicator.</p>
<p>R20: For milestone purposes, why is having this as a share of agricultural land helpful/relevant? When is the threshold met for having a management commitment (or are only article 65 measures envisaged, this should be clear). Could the indicator not be quantified (ie the envisaged reduction of nitrate leeching as a result of the measure) How do we measure the results on investments with the same goal (there does not seem to be an indicator for investments in water quality)</p>	<ol style="list-style-type: none"> 1. See previous reply 2. Quantification of reduction in nitrate leakage would likely raise difficulties for MS to collect the information and reporting annually on this indicator. Management commitments are commitments which go beyond conditionality, and have an evidence-based link to the objective. 3. Investments as in the example provided are likely to be relevant under R9 or R23
<p>R21: For milestone purposes, why is having this as a share of agricultural land helpful/relevant? What is the real difference between R.20 and R.21. When is the threshold met for having a management commitment (or are only article 65 measures envisaged, this should be clear). Could the indicator not be quantified? Is using the tool of GAEC 5 a management commitment. When a nutrient balance is obligated in a member state because of the nitrate directive, are all farmers then having a commitment for improved nutrient management (as this management commitment is obligatory under the conditionality)?</p>	<ol style="list-style-type: none"> 1. See previous reply 2. R20 refers to management commitments beneficial for water quality and R21 to commitments for improving nutrient management. It is not excluded that a certain intervention can contribute to both indicators 3. See previous reply. 4. No, only management commitments going beyond baseline (obligatory) requirements are to be considered under this indicator (see previous replies)
<p>R22: We assume that the term "commitments" refers to agri-environmental interventions or ecoscheme, but it is not clear whether it seeks to disaggregate the commitments set out under Article 65 or</p>	<p>The definition of the indicator refers to "commitments" in the meaning explained in previous replies. It therefore excludes areas covered by investments</p>

<p>whether it could compute, as hitherto, the area covered by certain irrigation infrastructure (Article 68).</p>	
<p>R22: For milestone purposes, why is having this as a share of agricultural land helpful/relevant? When is the threshold met for a management commitment to be considered improving the water balance (or are only article 65 measures envisaged, this should be clear).</p>	<p>See replies to R20 and R21</p>
<p>R22: Sustainable water use: To which intervention and output indicator does it relate to?</p>	<p>The indicator refers to “commitments” in the meaning explained in previous replies. The unit of measurement is the number of hectares (output) covered by relevant interventions.</p>
<p>R23: This indicator requires to disaggregate indicator O.20. We think it is more convenient to express the % of farms/holdings rather than the % of farmers.</p>	<p>Concerning the “disaggregation” see previous replies on the same topic Note is taken of the proposed reformulation</p>
<p>R23: Is this a cumulative indicator. When is the farmer to be counted, when the investment is finalized? When an investment is made by a collective of farmers or a producers organisation or associations, are we counting the members. Why is meaningful for planning purposes (milestones). This investments could range from non-productive investments for agro-environments commitments to the production of renewable energy.</p>	<p>The nature of this indicator lends itself to the establishment of cumulative targets. The beneficiary of investment support is to be accounted when the corresponding output is (fully or partially) generated. Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. all farmers being part of the collective approach should be counted</p>
<p>R24: In order to calculate this result indicator, output indicator O.29 need to be disaggregated by theme/subject of the advice/training. We understand that indicator R24 look for the number of farmers that have received advice/trained in such subjects, with relation to</p>	<p>Concerning the “disaggregation” see previous replies on the same topic Correct Note is taken of the comment. Also see previous replies on the same topic</p>

<p>the total number of farmers. One more time, we think that the concept “number of farmers” in not precise nor consistent with the information provided by the official/standard statistics.</p>	
<p>R24: This indicator could show zero in the situation while farmers would be trained related to environmental – and climate performance via the FAS system and via the collectives for agro-environmental support. This is because the farmers are not directly supported in both types of intervention. Also it would be difficult to get the data on the amount of farmers receiving training as this is not at the moment a figure collected in the FAS system of by the collectives.</p>	<p>Farmers benefitting from training/advice supported under CAP plan relevant interventions are to be considered under this indicator. If no farmers are trained/advised through the CAP plan (e.g. because advice/training is only provided through national schemes outside the plan) this result indicator would become irrelevant for the plan and will not have to be applied. If the farmers being part of a collective approach are trained/advised through interventions supported under the plan, they will have to be counted Note is taken of the comment on the possible problems with quantification</p>
<p>R25: We would need the definition of forest protection and management.</p>	<p>There is no intention to provide definition of forest protection and management. Relevant interventions will have to be designed by each MS in accordance with the specific needs and conditions of the forest area concerned in terms of protection and management</p>
<p>R25:</p> <ol style="list-style-type: none"> 1. For milestone purposes, why is having this as a share of forest land helpful/relevant? 2. When is a management commitment counting for R.25 and when for R.26. There seems to be an overlap in purpose (forest protection and supporting landscape, biodiversity an ecosystem services can be the same thing) 3. (Are only article 65 measures envisaged, this should be clear). 	<p>See previous replies to R 19 20 and 21 R25 refers to commitments for forest protection and management, while R26 to commitments for landscape, biodiversity and ecosystem services. Depending on the interventions design, it is not excluded that a certain intervention can contribute to both indicators Indeed, forest commitments can only be supported under art 65.</p>
<p>R26:</p> <ol style="list-style-type: none"> 1. It is calculated as the ratio between the hectares covered by indicator O.14 (a breakdown) and the total forest area. 2. It would be appropriate to merge R.25 and R.26 into one indicator. 	<p>Note is taken of the suggested reformulations. It seems suitable to keep both indicators to highlight the specific contribution of CAP interventions on forestry for biodiversity.</p>

<p>R26: For milestone purposes, why is having this as a share forest land helpful/relevant? Why make difference between commitments on forest land and agricultural land (R.27)</p>	<p>See previous replies to R 19, 20, 21 and previous reply A share is more meaningful when numerator and denominator relate to similar items. In this context we believe that it is relevant to separate actions on forest land from actions on agricultural land.</p>
<p>R27: For milestone purposes, why is having this as a share of agricultural land helpful/relevant? Are only article 65 measures envisaged as ecoschemes and conditionality also can be aimed at these purposes. How could we quantify the difference in impact with regards of the quality of the management. For instance a management commitment in the collective approach has a higher chance of being effective than a simple management commitment like permanent grassland. Why a difference between commitments on forest land and agricultural land (R.26)</p>	<p>See previous replies to R 19 20 21 and 26 See previous replies on the meaning of “commitment” Result indicators are not meant to quantify impacts (also see previous relevant replies) See reply to R26</p>
<p>R28: Please clarify whether it refers to provisions under Article 67 (as it does O.12) or if it has a broader scope. Should double counting be avoided? This indicator may be coincident with a possible breakdown of indicator O.12.</p>	<p>The indicator refers to the area covered by commitments (see previous replies as regards interpretation of this term) in Natura 2000 designated areas. Accordingly, it can go beyond the support under art 67, for example by taking into consideration management commitments based on art 28 or 65 in Nature 2000 designated areas Under this indicator double counting has to be avoided, in the meaning that the same hectare possibly covered by two commitments (e.g. under art 65 and 67) will have to be counted only once</p>
<p>R28: Is al area within Natura 2000 sites to be counted, even if it is not agricultural land or forest land. Why is having a different indicator for Natura 2000 necessary. Are only article 65 measures envisaged as ecoschemes and conditionality also can be aimed at these purposes. How could we quantify the difference in impact with regards of the quality of the management.</p>	<p>All hectares supported through the CAP Plan interventions (and therefore excluding conditionality) and located in a Natura 2000 designated area will have to be considered under this indicator (also see previous reply) Result indicators are not meant to assess impacts (see previous replies on the same topic)</p>
<p>R29: Please clarify if it is calculated from the indicator O.13 and the</p>	<p>Yes, hectares counted under O.13 (but not necessarily all of them) can be relevant for</p>

total UAA.	this result indicator and the denominator is the total UAA.
R30: Please clarify if it refers to young new farmers. It is not clear if it refers to young farmers who are beneficiaries of complementary income support or if it refers to the support granted under provisions of Article 69.	The indicator refer to the “setting-up” support, which is provided under art 69 and art 27. The latter article covers the complementary income support for newly set-up young farmers and is therefore relevant for this indicator. Please also note that a young farmer benefitting from support under both art 27 and 69 will have to be counted once under this indicator (no double counting)
R30: This indicator does not count the other interventions aimed at generational renewal for young farmers like investment and yearly payments. Why not?.	Note is taken of the comment. However, this indicator is meant to focus only on the setting-up support provided under articles 27 and art 69. Other forms of support provided to young farmers (e.g. investments, training, cooperation...) are captured by other indicators.
R30: New business start-ups should be included in line with the specific objective, not only generational renewal.	Note is taken of the comment, which however is not fully clear. Please also note that interventions for business start-up outside young farmers setting-up could be captured by other result indicators, such as R31
R30: Generational renewal: Does this indicator relate only to the setting up new farms?	See previous replies
R31: An improved definition is needed: usually job indicators have required quite a number of clarifications in order to be harmonised: what type of interventions must be taken into account, what happens with partial and temporary jobs, indirect jobs, jobs created during the project works or after the starting of the project.	Note is taken of the comments. Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation
R31: This indicator is impossible to measure as written. Every project in the CAP might create a job, this is depending on if the project (for instance an investment project) helps economically for a participant that he needs more workers. This does not seem to be the purpose of this indicator as it would presumably be aimed at project with the aim to diversify the rural economy. But that really is not clear, nor is clear	Note is taken of the comments. Methodological clarification concerning the calculation of indicators will be provided in line with article 120 CSP Regulation. However, number of jobs is generally reported in full time equivalent

<p>what types of interventions should be counted and how we would measure if a new job is created (do we count the number of people employed, what about part time jobs?) How would the PA now if a new job is actually created?</p>	
<p>R31: Growth and jobs in rural areas: the title refers to the growth, but the indicator relates only to the new jobs. Also, it is not clear whether this indicator refers also to the Leader projects.</p>	<p>Note is taken of the comment; All relevant interventions (LEADER included) will have to be considered</p>
<p>R32: A definition or a reference for “bioeconomy businesses” is needed. Forest businesses are included within this indicator? Is this a breakdown of indicator O.23?</p>	<p>Definition of bio-economy business is not intended to be provided in the legal texts. In general terms, the bio-economy comprises those parts of the economy that use renewable biological resources (animals, plants, micro-organisms and derived biomass) to produce food, feed, bio-based products, energy and services. Relevant forest business may be considered for this indicator This result indicator can be related to O.23</p>
<p>R32: It is not clear when a business is a bioeconomy business or when a business is supposed to be developed. What link is there with the interventions in the CAP?</p>	<p>See previous reply CAP plan interventions can support business start-up linked to agriculture and forestry, including as regards bio-economy</p>
<p>R33: We still need more details concerning how Smart Villages’ strategies are going to be boosted.</p>	<p>“Smart village” is not a new concept. and material is available on how to support smart villages (this does not form part of the performance monitoring and evaluation framework). The title of this indicator is Digitising the rural economy. Further details of the definition will be provided in the indicator fiche</p>
<p>R33: This would seem to connect to a missing output indicator, namely the number of smart villages projects. This is a way to specific result indicator connected to a very specific policy. It would seem to be that R.34 also covers this area. In our view this indicator is not necessary.</p>	<p>Note is taken of comments and proposals</p>
<p>R33: It should be best to keep this as simple as possible and talk about a plan instead of a strategy in order not to confuse this with the local strategy (Leader). A better wording is needed. Drafting suggestion: <i>Share of rural population covered by...</i></p>	<p>Note is taken of comment and proposal</p>

<p>R34: We think that this is not under the scope of the CAP. It is based on output indicators that are not foreseen in the proposal (i.e. “number of people concerned by X type of projects.”) It should be detailed which types of infrastructures are being taken into account for the calculation of this indicator.</p>	<p>Interventions for improving services and infrastructures are under the scope of CAP plan types of interventions (e.g. art 68). It will up to the MS to defined which types of investments will be needed to be supported through the CAP plan in view of improving infrastructures services, based on needs analysis of the area concerned by the plan</p>
<p>R34: Conflicting views on this indicator have been discussed for a long time: when all measures are added up, we’ll get an enormous figure that does not tell anything. Proposed indicator is relevant if it only means access that improves via broadband connections and population covered by these.</p>	<p>Note is taken of the comment. However, COM is of the opinion that, apart from broadband, it is important to have information also about access to other infrastructure and services</p>
<p>R35: What intervention provides support for social inclusion: cooperation, LEADER? It should be clarify what are minority and/or vulnerable groups benefitting from supported social inclusion projects.</p>	<p>Relevant interventions and relevant target groups will have to be qualified by the MS based on the specific contexts and needs of the territory covered by the plan. Subject to decision by the MS, the following types of interventions may be concerned: cooperation (RD), knowledge exchange and information (RD), investments (RD), installations of young farmers and rural business start-up and LEADER.</p>
<p>R35: Counting the number of projects aimed at minority and/or vulnerable groups might be possible. It is however not possible to ascertain how many people are benefitting from such projects as some projects facilitate not specific people but create infrastructure to be used, while it is not clear how many people can/will use it</p>	<p>Note is taken of the comment. The indicator refers to projects addressing specifically social inclusion. As explained above, result indicators have been defined for the purpose of the performance review and, therefore, they tend to reflect the purpose of the interventions</p>
<p>R35: better wording needed Drafting suggestion: Share of rural population covered by Leader strategies.</p>	<p>This indicator is not meant to refer only to LEADER. To be noted that this is the only result indicator referring explicitly to “social inclusion” (under specific objective h)</p>
<p>R.33 Digitising the rural economy and R.34 Connecting rural Europe and R.35 Promoting social inclusion: is it possible that these result indicators would overlap to some degree?</p>	<p>Depending on its design, it is well possible that one intervention/operation will contribute to more than one of the three result indicators referred to in the question</p>
<p>R36: Please clarify if this indicator is a disaggregation of O.16. It could be calculated from the LU covered by indicator O.16 (a breakdown of it</p>	<p>O.16 refers to animal welfare commitments, some of which can well be relevant for this result indicator</p>

<p>related to the use of biosecurity measures more restrictive) and the total number of LU.</p>	
<p>R36: Why is share necessary. It would make it very difficult to plan as it is not clear what livestock should be counted to calculate a share. For planning purposes the number of livestock units might be sufficient. Is a livestock unit a good measure for the impact of the supported actions. Could this be counted as the reduction in use envisaged by the supported actions?.</p>	<p>The share is used for the planning in relative terms. . It indicates the extent of coverage. Comment and proposal are noted. However this indicator is not meant to measure impacts. The indicator is expressed as a shared of LU concerned by supported actions, not as reduction in use of antibiotics. The latter would be difficult to quantify and report annually.</p>
<p>R.36 Limiting antibiotic use, R.37 Sustainable pesticide use, R.38 Improving animal welfare: These obligations are partially covered by conditionality; how should they be included in these indicators?</p>	<p>The indicators refer to relevant interventions under the scope of the indicators, going beyond baseline requirements (where conditionality is the baseline).</p>
<p>R37: Please clarify if this indicator is a disaggregation of O.13 and if the denominator refers to UAA. Please clarify if it is calculated from the hectares covered by O.13 (or a breakdown of it related to the use of pesticides) and the total UAA.</p>	<p>O13 refers to agri-environmental commitments, which in fact may be relevant for this result indicator Yes, the denominator refers to UAA</p>
<p>R37: 1. For milestone purposes, why is having this as a share of agricultural land helpful/relevant? 2. Why only pesticides and not also herbicides. 3. Why not count this in expected reduction in use.</p>	<ol style="list-style-type: none"> 1. See previous answers to the same question 2. By definition, “pesticides” includes the concept of “herbicides”. 3. Because this would be very difficult to quantify and report annually
<p>R38: Please confirm if this indicator is a breakdown of O.16 and if the denominator is the total number of LU.</p>	<p>O.16 refers to animal welfare commitments, which are indeed very relevant for this result indicator The denominator is indeed the total number of LU</p>
<p>R38: How does this indicator relate to O.16 where the output of interventions for animal welfare, animal health and increased</p>	<p>This indicator refers to LU benefitting from animal welfare interventions. Therefore there is a very straightforward link with O.16</p>

<p>biosecurity are reported together. This result does not say anything about the actual level of animal welfare needed. In R.10 quality schemes are mentioned: some quality schemes are also aimed at improving animal welfare. This means that R.10 and R.38 are overlapping to some degree.</p>	<p>“The level of animal welfare needed” cannot be expressed through a result indicator (it should be derived by the needs analysis) It is possible that a certain intervention contributes to more than one result indicator</p>
<p>An additional output indicator O.31a needs to be added for interventions for the environment and climate where the payments are not based on hectares, but for example practices at farm level.</p>	<p>Comment noted.</p>