

Written questions coming from MS after GREXE October on different indicators

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Indicator's name	MS	Question	Answer to MS
R.6, O.6a	CZ	There is certain inconsistency between the methodology of R.6 and that of O.6a. The R.6 does not reflect how evenly the farm size is distributed. If unevenly distributed farm size is (many small farms and few very large farms) the indicator shows the redistribution to only small portion of land while the indicator is still "sufficiently high". If the CRISS is distributed on a basis of "first hectares" for all farms, the R.6 will use the average farm size as the criteria for the redistribution (those beneficiaries that are in numerator). But at the same time indicator O.6a will assume all hectares eligible for a CRISS payments that will go far beyond the limit (=average farm size). The amount of eligible hectares (O.6a) will be significantly higher than the amount of hectares below average farm size. Is it that what both indicators should show us?	O.6a should report the hectares supported by the CRISS, i.e. the number of hectares paid (e.g. CRISS is implemented from 0 to 20 ha, a supported farm of 100 ha is reported as 20 ha supported by CRISS). As regards R.6, all indicators have their own merits and flows. The fact that a MS may have many small farms and then some very big ones is known and can/should indeed be taken into account when analysing the R.6 value.
R.12, R.14	CZ	We ask to remove text in Comments „as well as afforested land on UAA“ We would like to indicate intervention Afforestation as measure concerning on sequestration. Further Afforestation and agroforestry are mentioned at the description „Types of intervention concerned“	In the case of afforestation, the land use category is going to be changed to forest area (sooner or later, depending on the MS specific legislation) so the committed land area should be counted as forest area. Therefore, the text in Comments „as well as afforested land on UAA“ will be added to R.12, to be consistent with R.14. By contrast, under agroforestry, the land use category should remain the original one, or can be changed to agriculture. This precision was added to the fiche.
R.17	CZ	Afforested land: Area supported for afforestation and creation of woodland, including agroforestry. We request to add Article 65 under which agroforestry is mentioned to the "Type of intervention".	This is not possible. R.17 relates to area supported for afforestation and creation of woodland. Article 65 relates to management commitments to maintain/protect these areas once created.
R.23	CZ	Environment-/climate-related performance through investment: Share of farmers with support in investments related to care for the environment or climate • In comments of the indicator is, that other investments in afforestation are accounted in R.17. What does mean other investments in afforestation?	"Other investments in afforestation" has to be read as investments realised in afforestation by non-farmers.
R.30	CZ	Generational renewal: Number of young farmers setting up a farm with support from the CAP • Why and based on what is the indicator split by gender? Does this mean that gender needs to be included in the single application? • If the young farmer counts as 1 as from the first payment, does this mean that the single application must be accompanied by an indication of whether the applicant is applying for the first year?	1) It is a long-standing request of the European Parliament and other EU institutions such as the European Court of Auditors to provide information split by gender. Therefore, to be able to address this request, gender is to be included in the single application. After the discussion at last GREXE (November), the Commission understands that information on gender is already available in some MS within the single application form. 2) It does not seem necessary to us as using the unique identifier of beneficiaries should be enough to ensure that the young farmer is counted at least once and only once over the programming period.
R.34	CZ	It is not possible to exclude double counting of population without the knowledge of specific people, where for example one project supports a school and the other one a club room for leisure activities in the same municipality as well as in a neighboring municipality (affected population will overlap). So how to count it?	To avoid double counting as much as possible, target populations should be defined as specifically as possible (at municipality level e.g.) and the municipality covered by both projects should be reported once only. For example, if the school project, which covers municipality A, is reported in year N and the club project, which covers municipalities A and B, is reported in year N+1. The population of municipality A is reported in year N and the population of municipality B is added in year N+1. Since it is a cumulative indicator, in year N+1, the value of R.34 will be the sum of population A + population B.
R.36, R.38	CZ	For these indicators it is mentioned, that the conversion of animals to LU should be performed according to Eurostat conversion factors, with the exception of LU estimates for investments, e.g. in buildings improving animal welfare, the number of LU is estimated based on the production capacity, using the standard conversion rates of animals to LU (Annex II of Reg 808/2014). In the current RDP, conversion factors are uniformly used, eg. for animal welfare, also according to Annex II of Regulation (EU) No 808/2014. Does it mean, that LU will be determined, for example in the context of animal welfare, according to new conversion factors according to Eurostat? From our point of view, this is an administrative burden and we would like to continue to use the currently valid coefficients for conversion to LU according to Regulation 808/2014, not according to Eurostat.	In the current version of the fiches, the Commission cannot refer to a Regulation that will not apply anymore in the next programming period. However, several MS pointed at the need of a simplified list of coefficients and the Commission will take this into account when drafting the implementing acts.
R.39	CZ	If a new indicator R.39 is set, it will be possible to include the contribution of organic farming in R.18 and R.20 as well. So is it recommended to use under three indicators to use?	Yes. MS can link the contribution of organic farming to R.18 (Improving soils) and R.20 (Protecting water quality), depending on the intervention logic described by MS on the specific intervention.
General question/comment (Afforestation)	CZ	we have uncertainties regarding the reporting of the contribution to afforestation of agricultural land, which appears in several indicators with some exceptions. we recommend that the reporting system be stated clearly and simply.	A similar question was addressed in the written Note "Answer to a series of Member States comments on indicator fiches", circulated in July. In that document it was indicated that: "Investments support aimed at the afforestation of agricultural and non-agricultural area of the farm shall be reported under O.20 (Number of supported non-productive investments) or under O.21 (Number of off-farm productive investments). Both these indicators could be used depending on the previous purpose (leisure, environment, production) of the forest and on the final purpose." In addition, " More generally: - all area-related investment in afforestation shall be recorded under R.17, independently from who is the beneficiary; - all investments in forests are reported under R.17a; - all investment in afforestation realised by farmers are also accounted in R.23."
General question/comment (LEADER, LAG)	CZ	Monitoring of Result indicators is not relevant at the LAG level, because some indicators are without double counting, which cannot be ensured from the LAG level – LAGs have no information on the support of the same beneficiary from another intervention or on the support of the same beneficiary in another LAG (beneficiary may have more than one establishments). How can we meet this condition at the LAG level?	Result indicators are computed by managing authorities based on the information directly and for LEADER the information collected by LAGs. To minimise double counting, target populations should be defined as specifically as possible (e.g. at municipality level). To provide a more accurate reply, could you please let us know which kind of information LAGs might have difficulties to collect and report, knowing that managing authorities are in charge of avoiding the double counting, not the LAG?
General question/comment (LEADER, LAG)	CZ	We assume that if LAGs are obliged to report R-indicators, then they could use those indicators that correspond to the type of projects under the strategy (for example Investment Art. 68), and not those for which Article 71 is mentioned as the type of intervention concerned?	In the framework of implementation of LEADER intervention, Managing Authorities should report only against RI specific for LEADER intervention as defined in the Plan, based on the information collected close to LAGs. However, if a LAG is also beneficiary of another intervention outside LEADER, then it will have to be accounted in the RI linked to this intervention.
O.3	CZ	We do not agree with the additional breaking down of this indicator by type of intervention... In our opinion dividing number of beneficiaries by type of intervention would reduce the readability of the indicator and do not bring any added value. Especially when majority of beneficiaries apply for BISS and there cannot be double counting. With this methodology the aggregates in indicator O.3 would not provide the same numbers as following indicators of individual interventions. We also do not agree with the breaking down by sex of beneficiary and legal entity. This would be administrative burden for Member States. Concerning the comments in indicator O.3, there are mentioned beneficiaries of CAP support and direct payment beneficiary. We would like to ask for defining direct payment beneficiary precisely. Why and based on what is the indicator split by gender? Does this mean that gender needs to be included in the single application?	1) The aggregation "by type of intervention" was added because without it, we would miss the total number of beneficiaries of eco-schemes, coupled payments, AECMC... As indicated in the example at the GREXE in November (and in the GREXE in December 2019), the number of beneficiaries has to be reported by intervention, but there might be several interventions defined under one type of intervention. Thus the need of the aggregate by type of intervention, to be reported without double counting. 2) and 4) As regard the breaking down by gender of beneficiary and legal entities and the availability of this information, after the discussion at last GREXE (November), the Commission understands that information on gender is already available from the single application form in several MS, therefore the additional administrative burden should be limited. 3) As regards the definition of direct payments beneficiary, the beneficiaries are the final recipients of the direct payments interventions (e.g. the person receiving the payment for BISS in a given financial year).
O.4	CZ	The decomposition of this indicator into its subsets is newly proposed. But further this indicator is mentioned twice in the new proposal. In the first case it means Number of hectares for decoupled direct payments, in the second case it means Number of ha for basic income support for sustainability. We ask for clarification on this proposal.	O.4 "Number of hectares for decoupled direct payments" corresponds to the Commission proposal. The Presidency proposed to split O.4 in 4 indicators O.4, O.6, O.6a and O.6b. Therefore, O.4 "Number of ha for basic income support for sustainability" is part of the Presidency proposal.
O.6a	CZ	What is meant by the claim that there should be no double counting? According to the new proposal this indicator is a subset of O.4. Will the number of hectares for complementary redistributive income support for sustainability count towards indicator O.4 and indicator O.6a simultaneously or only to O.6a?	a) O.6a, as all the indicators split from the O.4 originally proposed by the Commission (e.g. O.4, O.6 and O.6b), should be, by default, without double counting (only 1 payment per ha is possible), it remained there as a safeguard. b) No. Following the new proposal of the Presidency, the new O.4 should account for hectares paid under BISS (basic income support for sustainability), while O.6a should account for hectares paid under CRISS (complementary income support for sustainability).

O.11	CZ	We ask to modify the indicator name „top up” and „All categories”, because it is not clear and we propose to replace a specific category (M, O, S)	The Presidency proposal for O.11 is "Number of ha receiving support for areas facing natural or specific constraints (all categories)". The alternative proposal put forward by the Commission is O.11: Number of ha receiving a top up for areas facing natural or specific constraints (3 categories). Would the following title be clearer for you: 'O.11: Number of ha receiving support for areas facing natural or specific constraints by type of areas'. With the specification of the 3 area types mentioned in the definition. If so, please inform the Presidency.
O.13	CZ	Will be reported the afforested land in accordance with Article 68 under this indicator? It is possible to report agroforestry systems on agricultural land under this article? In the comments fiche indicator O.13 is indicate that commitments on afforested land on UAA are also to be reported under O.14, it means that it will be reported in both O.13 and O.14? Is it only afforestation or Agroforestry, which in the Czech Republic will be implemented on agricultural land?	1) No, Article 68 concerns investments, while O.13 concerns management commitments (Article 65). 2) No, as indicated in the written Note circulated in July, "Environment/climate commitments going beyond mandatory requirements on forest land, included when afforestation took place on agricultural land, shall be reported under O.14.". Any other non-agricultural area covered by these commitments is included in O.13. The comment in the fiche O.13 will be changed to avoid confusion to: 'Forestry area covered by environment/climate commitments and commitments on afforested land on UAA are to be reported under O.14'.
O.16	CZ	For this indicator it is mentioned, that the conversion of animals to LU should be performed according to Eurostat conversion factors, with the exception of LU estimates for investments, e.g. in buildings improving animal welfare, the number of LU is estimated based on the production capacity, using the standard conversion rates of animals to LU (Annex II of Reg 808/2014). In the current RDP, conversion factors are uniformly used, eg for animal welfare, also according to Annex II of Regulation (EU) No 808/2014. Does it mean, that LU will be determined, for example in the context of animal welfare, according to new conversion factors according to Eurostat? From our point of view, this is an administrative burden and we would like to continue to use the currently valid coefficients for conversion to LU according to Regulation 808/2014, not according to Eurostat.	In the current version of the fiches, the Commission cannot refer to a Regulation that will not apply anymore in the next programming period. However, several MS pointed at the need of a simplified list of coefficients and we will take this into account when drafting the implementing acts.
O.31, O.32	CZ	<ul style="list-style-type: none"> <li>CZ maintains its view, as it expressed on the many occasions, that this indicators should be deleted. Their reporting would bring excessive administrative burden and they are not directly linked to the performance review.</li> <li>We would like to point out, that the request implies the significant additional administrative burden and we disagree with that approach. Some elements will need to be newly declared / drawn up in LPIs, in some cases, it is not realistic either. Examples of these may be areas of buffer strips, where their width is individually dependent on the crop and the plant protection product used.</li> <li>As we have already indicated in our Comments from 10 Apr. 2019 WK 3453/2019 ADD 15, monitoring of the proposed indicator would cause substantial efforts - especially in relation to certain GAECs, for example, GAEC 4 and GAEC 9 there are quite a few issues concerning the possible methods of monitoring.</li> <li>We would like to draw your attention to the fact that as an output indicator, O.32, can only be reported in full when all the related payments are executed. This, due to the number of payments related could become rather a complicated and time-consuming mechanism.</li> <li>We would also like to point out, that the request implies the significant additional administrative burden and we disagree with that approach. Some elements will need to be newly declared / drawn up in LPIs, in some cases, it is not realistic either. Examples of these may be areas of buffer strips, where their width is individually dependent on the crop and the plant protection product used.</li> <li>Given the above comments and the fact that CZ has not yet developed the respective monitoring instruments, we are not in the position to support introduction of this output indicator O.32.</li> </ul>	<p>a) Information on the uptake of environmental/climate practices and more detailed information on GAEC practices is necessary considering the environmental and climate challenges and ambitions of the EU as reflected in the Farm to Fork and Biodiversity strategies and in Annex XI of the legislative proposal and to provide information on environmental efforts supported under the CAP.</p> <p>b) Comprehensive and sufficiently specific data on the uptake of different types of practices under each GAEC is vital for evaluation of CAP effects on climate, biodiversity, soil, water and to address knowledge gaps. Gaps in such data affect not only the quality of evaluations in terms of environment/climate impact but also the appreciation of the efforts made by Member States and farmers under the CAP.</p> <p>c) To this end, some additional effort of MS might be necessary but Member States can draw on the methods developed under the current greening or GAECs. Member States have flexibility to set their own methodology for measurement in a proportionate way such as to provide a reliable measurement but limit as much as possible administrative costs. For GAEC 4: To simplify calculations Member States may decide to use conversion factors to limit the necessity of a measurement to the length of the buffer strip, provided the minimum width will be assured. For GAEC 9: It will be for Member States to decide on details of the definition of GAEC 9 elements/features including issues such as dimension limits based on two layers, those elements to be protected and those elements to be qualified under the future EFA (though both lists may be similar), if necessary, methods of calculation by using or not conversion factors or weighting factors, provided the choices are compatible with the objective of the GAEC.</p> <p>d) The issue of timing for the execution of payments covered by GAEC under conditionality has no effect on building indicator O.32. Farmers must comply with the GAEC obligations irrespectively of the payment management. The area to declare is indeed the one subject to the GAEC in question during the year in question. The answers are provided based on the Commission proposal and might need to be revisited depending on the final outcome of the inter-institutional negotiations currently taking place.</p>
General question/comment (Clerical error)	CZ	We kindly ask for specification of newly reintroduced abbreviation "GAEP"	Thank you for spotting the error. The O.32 fiche has been corrected to GAEC.
General question/comment (Indicators and Strategic Plans)	CZ	Could you please confirm whether the indicator will be evaluated ex post and will not be part of quantification in the Strategic plan?	Could CZ authorities please clarify the meaning of this question?
General question/comment (Level of indicators)	CZ	The breakdown values of this indicators must be on regional level, or on the national level?	The values of the indicators in Annex I are reported at CAP plan level. Information at regional level on context indicators is also available and displayed in the CAP indicators site of Agri-food data portal.
General question/comment (GAEC and Performance framework)	CZ	Please confirm, if the measures taken under GAEC will be counted in the framework of performance report to achieve the milestones.	No, area under GAEC are not accounted under the Result Indicators, focusing on interventions above baseline. Milestones are reported only for Result Indicators.
General question/comment (Result indicators)	DE	Clearance regarding the definition of „farmer/farms” – especially considering including beekeeper, bee institutes, etc. Strict use of the word „farmers” / „farms” would exclude more than 95% of the beneficiaries (e.g., hobby beekeeping in Germany). Moreover, bee institutes, analysis laboratories, research institutions would be excluded from sticking to “farms.”  A question answered by the GeoHub stated that these areas covered. Nevertheless, we would like to make sure of this fact	Due to the large share of beekeepers directly/indirectly benefiting from sectoral interventions in apiculture, adding the figures to the number of farmers-beneficiaries would mask the progress in implementing other measures than apiculture. For this reason, the Commission takes into consideration the possibility of removing apiculture from all the result indicators (i.e. R.5, R.9 and R.10) and add a specific result indicator for apiculture, namely the "Share of beehives supported with the CAP". Please address also this issue to the Presidency.
R.1, R.24	DE	Clarification in the fiche: "Number of people who took part in the funded measure." Or more precisely: number of people who benefit from the funded measure." According to the current knowledge, the educational institutions will receive the funding and not the participants directly. The participant would benefit indirectly from reduced participation fees.	Do you propose that we should add to the fiche that the 'Number of persons benefiting from relevant paid support' is to be understood as the 'number of people who benefit from the funded measure'? In any case, the Commission acknowledged your concern and changed the fiche.
R.5	DE	Clarification in the fiche that beekeepers are included. In O.8, the number of beneficiaries, number of investment funds, hectares, or tonnes should be counted. In R.5, just the number of beneficiaries is required here (depending on the design of the intervention):  Beekeepers should be considered here already (same for R.5 (Numerator + Denominator)	Due to the large share of beekeepers directly/indirectly benefiting from sectoral interventions in apiculture, adding the figures to the number of farmers-beneficiaries would mask the progress in implementing other measures than apiculture. For this reason, the Commission takes into consideration the possibility of removing apiculture from all the result indicators (i.e. R.5, R.9 and R.10) and add a specific result indicator for apiculture, namely the "Share of beehives supported with the CAP". Please address also this issue to the Presidency.

R.27a	DE	Change of methodology: farms is too narrow. Non-productive investments for biodiversity are made both on agricultural and non-agricultural land. Above that, sometimes investments are done by NGO's or communes and not by farms.  The title of R.27 fits this adoption. However, the unit (Farms) should be reconsidered.	Investment carried out by non-farmers should be reported under R.23a (Environment-/climate-related performance through investment in rural areas).
R.31	DE	Clarification in the fiche necessary. It should be reconsidered which interventions should be included here (we disapprove of „small farm support scheme“ and „young farmer payment.“)  Above that, the moment of data collection should be reconsidered	We proposed in the last GREXE to report Small Farmers Scheme under R.35 and not R.31. Regarding Pillar I young farmer payment, its inclusion under R.31 Jobs created goes hand in hand with the inclusion of the Pillar II installation grant. Both aids have the same objective: generational renewal. MS are free in their Strategic Plan to use one or both instruments in their strategy to support young farmers setting-up. The 2% envelope obligation applies to both. The difference between the two schemes is that the Pillar II support is granted to set-up and the Pillar I support once sat-up. Many young farmers receive both support and they will be accounted only once anyhow.
R.33	DE	Clarification in the fiche necessary. We welcome the changes made here, which is a clear simplification. However, we would welcome clarifications regarding: What counts as a Smart Village Strategy (or does the MS defines this?) Do single projects count as a strategy? Double counting should be possible here.	1) As indicated in the slides presented in the GREXE of 1.10.2020, Smart Village Strategies relate to integrated packages of future-orientated actions to be defined by the MS, see <a href="https://enrd.ec.europa.eu/sites/enrd/files/enrd_publications/smart-villages_orientations_sv-strategies.pdf">https://enrd.ec.europa.eu/sites/enrd/files/enrd_publications/smart-villages_orientations_sv-strategies.pdf</a> 2) As indicated in the fiche under the "methodology" section: "Double counting of the same strategy should be avoided. If the same strategy is supported through several operations, the strategy should be counted only once".
R.34	DE	Double counting should be possible. Otherwise, all following operations would be not counted and would lead to no results. Potentially beneficiaries who overlap with other interventions/projects are not counted in. To reach a high value, beneficiaries need to be evenly distributed along the projects already during the selection process.	As indicated in the fiche "Double counting of the same population should be avoided. If different operations are supported in the same area, the population should be counted only once", because we want to assess the coverage of CAP support on the whole territory. If all the support is granted to the same region/population, the CAP will deliver less social benefits.
R.35	DE	Clarification in the fiche necessary. We are still not favour this indicator, even with the clear simplification (no double counting). For us, it is unclear how to define vulnerable groups here: is this defined on MS level (there is no European definition yet)? The effort for this indicator is too high without gaining much information or comparison between MS. Planning this indicator seems to be very difficult, as there is no connection between the outputs. Adjustments will be tricky, too. The expected outcome (share of the rural population) would be very low >> consider changing back to total value? – as there will be no comparison between MS without a common definition for vulnerable groups. Moment of data collection unclear (expected participants): Where should we get the numbers for planning from? How do you foreseen the calculation for LEADER (Art. 71)? In our view, this is a secondary objective of the future CAP.	1) Yes, vulnerable groups are defined by MS. Depending on the situation in the different countries, different groups might be considered; 2) We think it is important to show how CAP contributes to social inclusion, since this is one of the specific objectives and R.35 is the only indicator specifically addressing "social inclusion"; 3) For the planning MS should focus on the number of planned/expected beneficiaries of LEADER-supported projects and activities targeted to vulnerable groups should be counted. The concept is the same for all indicators; 4) The Commission will address the question of absolute vs. relative value at the next GREXE. However, the change would entail a modification of the indicator label, therefore please inform the Presidency; 5) Moment of data collection: at first payment, like for the other indicators; 6) On the calculation for LEADER (Art. 71), DE could count the number of participants to LEADER project targeting vulnerable groups. The main issue is the definition of vulnerable groups, which is defined by the MS; 7) Social inclusion is one of the specific objectives, and thus it is a primary objective of the future CAP
O.35	DE	Clarification necessary. The number of beehives and beekeepers do not cover the whole spectrum as in GER mainly organizations are the beneficiaries. Just in some cases, beekeepers are directly the beneficiaries. Categories b), c) and e): We welcome the addition of „applications/systems“; however, we do not foresee if this would cover, e.g., combating enemies in beehives (pharmaceutical, devices, training), migratory beekeeping, the establishment and maintenance of "Trachtbetriebsnetze", breeding techniques for reintroducing ancient races.	a) Where the beneficiary is an organisation it counts as one beneficiary for the monitoring by intervention. For the aggregate, we expect the organisation to know the number of beekeepers members of the organisation. b) The 'combating enemies in beehives (pharmaceutical, devices, training)' actions falls within Cap Strategic Plan Proposal (CSP) article 49(1)b – combat invaders and diseases; 'migratory beekeeping' is covered by article 49(1)(c) - transhumance; 'the establishment and maintenance of Trachtbetriebsnetze' (information systems on "what cultures are flowering where") – could fall within article 49(1)(c) - transhumance; and 'breeding techniques for reintroducing ancient races' - could generously fall within 49(1)(a) – technical assistance but also within the bee-breeding measures proposed by the European Parliament.
General question/comment (Double counting)	DK	We also note that double counting is allowed for R.3. We are curious why this is not allowed for other similar indicators such as R.9 and R.23? We have previously highlighted that no double counting for these indicators will lead to investments with real effects not being reflected in the reporting. We also believe that it will lead to conservative targets, given that the overlap between beneficiaries for different interventions will be substantial.	Double counting is allowed when avoiding double counting is impossible or when the administrative burden would be disproportionate. In all other cases, double counting should be avoided. In the case of R.3, it is not possible to avoid double counting if the indicator covers knowledge measures for which participants to training on digitalisation can not be identified.
General question/comment (Non-productive investments)	DK	we also have a question in relation to non-productive investments (fx wetlands and lowlands) and relevant target indicators. We would like to know whether pre-appraisal projects should be attributed to the relevant targets and milestones?  (Pre-appraisal is the initial phase where it is determined whether or not a wetland/lowland project can be initiated. In DK, specific support is provided for this under the RDP pursuant to art. 17)	Although all interventions/operations should count for at least one RI, pre-appraisal projects (or feasibility studies or any other preparatory support) are not accounted under any result indicators. However, if a pre-appraisal project issues into e.g. a non-productive investment, then the non-productive investment will be the 'result' of the pre-appraisal project and it will be accounted for accordingly.
O.22	ES	It could be specified in the fiche for this indicator that the unit of measurement is young farmers rather than farmers, so as to be consistent with the title of the indicator.	Thanks for the suggestion, the fiche will be updated accordingly.
O.29a	ES	We propose to remove this indicator because it doesn't add any relevant information and we don't agree with the creation of new indicators (In order to simplify the list of indicators)	The indicator has been proposed by the Presidency. According to the Commission proposal, under this type of interventions Member States may cover costs of any relevant action to promote, inter alia, exchange and dissemination of knowledge and information which contribute to achieving the specific objectives set out in Article 6 (Art. 72 SPR), such as plans, studies or awareness actions. Any output that could be generated by an intervention requires a corresponding output indicator. In the case of plans, studies or awareness actions supported under Art. 72, this is O.29a. If a Member State chooses not to support plans, studies or awareness actions under Art. 72 in its CAP Strategic Plan, they do not have to report on O.29a.
O.34a	ES	We agree with the inclusion of indicator O.34a. However, we have the following comments on the methodology proposed in the fiche: - Methodology: For each type of intervention, it should be explicitly defined what is "operation" and what is "action". - Methodology for the aggregated values: In order to have this information available, an aggregate by operation should be included. In must be taken into account that there are duplications for multiannual operations.	The Commission will present an example for the calculation of O.34a at the next GREXE (January 2021).
Proposal for merged indicator R.25 and R.26	ES	We also appreciate the merge of the R.25 and R.26 indicators under one indicator. However, in the fiche of this merged indicator R.26 we would like to request the inclusion of article 71 on cooperation among the possible interventions.	A similar question was addressed in the written Note "Answer to a series of Member States comments on indicator fiches", circulated in July. In that document it was indicated that: "b) Even if Art. 71 is not included in R.26, Member States could still use this indicator to account for the results of a cooperation intervention or any other suitable intervention, if this is well justified in view of its design. This was supposed to be implied by this formulation: "The following types of interventions may be concerned, when specific requirements or conditions linked to the intervention can justify it". Nevertheless, the Commission will add a reference to Art. 71 to the fiche."

R.1, R.24	ES	In R.1 and Reference is made to the cross-cutting objective on knowledge and innovation in Art. 5. Does this mean that interventions under Art. 71 and Art. 72 can be focused only on the cross-cutting objective, without the need to link actions to other specific objectives? As the Commission clarified at the last GREXE meeting, we know that the indicators R.1 Enhancing performance through knowledge and innovation, and R.24 Environmental/climate performance through knowledge, are not necessarily only to be linked to the cross-cutting objective of knowledge. However, the questions we wanted to ask were the following:  1. Would it be possible to link only and exclusively indicator R.1 to the cross-cutting objective without linking interventions under Art. 71 and/or Art. 72 to any of the specific objectives?  2. Would it be possible to link only and exclusively indicator R.24 to the cross-cutting objective without linking interventions under Art. 71 and/or Art. 72 to any of the specific objectives d), e) and/or f)?	Result indicators can be linked to several SO depending on scientific evidence and on the intervention logic developed by MS. Having said that, a) in the specific case of R.1, yes, it appears to be founded to link R.1 only and exclusively to the cross-cutting objective of modernising the sector by fostering and sharing knowledge, innovation and digitalisation in agriculture and rural areas; b) on the contrary, in the specific case of R.24, individual operations/commitments may also contribute differently to the specific objectives d), e) and f), therefore the link between R.24 and these objectives is not exclusive and depends on the specific intervention logic design.
R.30	ES	The indicator indicates that, in addition to the supplementary payment to young farmers in article 27, the aid in article 69: first installation is collected. It is specified both in the unit of measurement and in the definition that it is for young people in article 4.1.e. To avoid confusion with the rest of the aid in article 69, we suggest it is specified that it is first installation aid in article 69.2.a.	The fiche will be adapted.
O.34a	ES	What does the EC understand by "action"?	Action' is a type of measure consisting in a specific activity or instrument aimed at contributing to one of the F&V objectives.
O.3	EE	Under the "Methodology for aggregates" there is a remark that "farmers benefitting indirectly from CAP support through actions of producer organisations (PO), training and advice actions, projects implemented under Local Development Strategies (CLLD/leader), mutual fund, are not taken into account in this indicator". Is this comment only about aggregated value? Or also when value is reported per intervention and per type of intervention? When value of number of beneficiaries who received a payment in Financial Year, per intervention and per type of intervention is calculated, then who is beneficiary in LEADER, in producer organisation and in financial instrument? Fichee indicates that in rural development beneficiaries are defined in Article 3(h), where for financial instrument the beneficiary is the body that implements the fund? Does that mean that for financial instrument the O.3 value is 1?	1) Methodology for aggregates focuses on farmers only. The details by intervention and type of interventions relate to all the beneficiaries; 2) For LEADER the LAG is the beneficiary, for sectoral interventions managed via operational funds the PO is the beneficiary, for financial instruments the beneficiary is the final recipient ('final recipient' means a legal or natural person receiving support from the Funds through a beneficiary of a small project fund or from a financial instrument).
O.6b	EE	At the moment fichee only reflects COM proposal. It should also contain Presidency proposal and corresponding units	The Commission will adapt the fiche at the end of the legislative process.
O.8	EE	Presidency proposal is "Number of units covered by supported insurance schemes". Therefore, the fichee should contain corresponding units and not only farmers.	The fiche will be adapted.
O.13	EE	The addition of beehive to this indicator is not suitable, because this indicator is about hectares. If the beehives are included in this indicator, then under the "Methodology for the aggregated values" should specify that aggregate by intervention is given separately for hectares and beehives. If under one intervention there is different unit amounts for hectares and beehives, then the aggregated value should not add these values together.	Beehives can be eligible as unit for Art. 65. If the Presidency proposal of indicator O.14a related to other units than ha is adopted, beehives could be recorded here and dropped from the list of units of O.13.
O.14a	EE	As the indicator name indicates that the unit of measurement is other than hectares, then "Definition", "Methodology", "Methodology for the aggregated values" and "Unit of measurement" have a mistake, that unit is hectare.	Thanks for spotting the mistake, the fiche was revised and circulated after last GREXE in November 2020.
O.15	EE	As the indicator name indicates that the unit of measurement is hectares, then "Definition", and "Methodology" have incorrect units. There should be number of hectares as in "Unit of measurement".	Thank you for spotting this error, the fiche has been corrected.
O.17	EE	How is the aggregated value by intervention calculated if under one intervention we have unit amounts with different units of measurement (for example hectares and LU)?What unit is accounted under the aggregated value of "Number of operations of genetic resources supported"? Do we give aggregated values for different units or is it the total number of paid operations? If one operation includes different species then is it 1 or 2 operations?	1) The indicator fiche lists three different aggregated values (operations, number of ha and number of LU); 2) Number of operations of genetic resources supported covers only genetic resources supported by interventions paid by operations; 3) In the aggregated number of operations of genetic resources supported, the support to endangered plant varieties and breeds is not counted.
O.29	EE	If there is an intervention, where one program consists of multiple outputs (for example one knowledge exchange program consists of different trainings, information days and study days), then is the whole program one action under O.29 or is every output separately one action under O.29?	What is an action depends on the way the intervention is designed and what is it paid for. If a MS pays for the entire programme as one operation, the output is the programme itself. If the MS pays individual actions in separate operations, then it should count them as separate outputs.
O.29	EE	Aggregated values have to be provided for total number of training and advice actions carried out for farmers and total number of training and advice actions carried out for non-farmers. If we have general training and advice actions then it is complicated to say if it is for farmers or non-farmers. What to do with action that targets bot groups (for example business development) - do we count it under both aggregates?	Thanks for spotting, the specific aggregates for farmers and non-farmers were removed from the fiche.
R.10	EE	Fichee does not have information about double counting. Can we assume that double counting is allowed? "Comments/caveats" should have remark that there might be double accounting.	Yes, double counting is allowed for this indicator. We have adapted the fiche, indicating this possibility under the "comments/caveats" section.
R.11	EE	In the "Methodology" it is written, that "For Financial Year N reported in February Year N+1, the value of production marketed in Year N-1 is divided by the output value of calendar Year N-1". What if producer organisations financial year is different from calendar year?	Financial year referred to under the "Methodology" section of the fiche, is relevant for managing the EU funds. According to Article 33 of HZR, agricultural financial year shall cover expenditure paid and revenue received and entered in the accounts of the Funds' budget by the paying agencies in respect of financial year "N" beginning on 16 October of year "N-1" and ending on 15 October of year "N". For producer organisations, what is relevant, is their value of marketed production in each calendar year in a given sector. Financial year of the funds does not have to match with the calendar year.
R.23, R.27a	EE	Should the investments for biodiversity contribute only to R.27a (Investments related to biodiversity: Share of farms benefitting from CAP investment support contributing to biodiversity) or also to R.23 proposed by Presidency (Investments related to natural resources: Share of farms benefitting from CAP investment support related to care for the natural resources)?	If the Presidency proposal (to split R.23 in three investment support result indicators: R16a, R.23 and R.27a.) is adopted, the investment related to biodiversity should only be reported under R.27a.
R.27a	EE	Is the denominator Total number of farms same as context indicator C.12? If it is then there should be reference to it. Same reference could be made also about other result indicators denominators.	Yes. The Commission will add the cross reference in R.27a and in all others indicators concerned.
R.28	EE	Why in the "Methodology" the denominator in formula for agricultural area is Total agricultural area in Natura 2000 sites (without natural grassland)? Why the natural grassland is not included? Commitments may include natural grasslands that are on Natura 2000 sites and therefore natural grassland should be included. If there are for agricultural area relevant commitments on Natura 2000 sites that include natural grassland then should they be included in the numerator for agricultural area?	As the expert from SE explained during the last GREXE (in November), if natural grasslands (Corine Land Cover nomenclature category 321) area are included under R.28 it would mean that very large areas in the far northern and mountain regions would be included. However, these areas are de facto not farming areas and they are not grasslands that depend on agricultural farming activity such as grazing. If these large areas were to be included in the denominator of the Indicator, this would imply a distortion. The risk is that any changes in areas that are actual agricultural areas (for example meadows and pastures that do depend on farming activity) may not be visible in the indicator if it also includes the large natural grassland areas.

R.31	EE	We do not support that Complementary income support for young farmers is included under this indicator. This intervention goal is generational renewal and not to create new jobs. In the "Comments/caveats", it is written that only new jobs actually created should be counted. Complementary income support for young farmers may also be paid to young farmers who take over existing farm. Therefore, we cannot be sure that every young farmer who receives complementary income support also creates a new job. If the Complementary income support for young farmers remains included into indicator R.31, then the fichee should have additional instructions about Complementary income support for young farmers. For example, what is the moment of data collection for Complementary income support for young farmers? Complementary income support is paid annually.	The rationale to include Pillar I young farmer payment under 'R.31 Jobs created' is the same as for the inclusion of the Pillar II installation grant. Both aids have the same objective: generational renewal. In both cases, it can happen that young farmers take over an existing farm, but it could also be argued that without this support the generational renewal could not take place, leading to job losses. MS are free in their Strategic Plan to use one or both instruments in their strategy to support young farmers setting-up. The 2% envelope obligation applies to both. The difference between the two schemes is that the Pillar II support is granted to set-up and the Pillar I support once sat-up. Many young farmers receive both support and they will be accounted only once anyhow. The moment of data collection is the first time the beneficiary is paid the complementary income support in this programming period. To know more how to combine under this cumulative indicator annual payments and RD support, see the example 1 presented in Annex III of the cover note circulated end of 2019.
R.36, R.38	EE	Based on the examples given in the 01.10 GREXE we have some questions about avoiding double counting. Double counting should be avoided at the level of beneficiary, but it was said in the GREXE that if beneficiary received different support for different animals that it should be counted twice. What if one beneficiary receives, under one intervention support for 200 LU and under second intervention support for 300 LU and overall this farm has total animals 400 LU. What number should be reported? What if one beneficiary receives support for animals and then these animals are given/sold to another beneficiary, who also receives support for these animals? Is then double counting allowed?	1) During the last GREXE it seemed that LU had the possibility to know if one project was related to pigs e.g. and the other one to bovine animals. If MS have this possibility it is great to count both. The example you provide is different as it seems to cover the same kind of animals. In this case, the most pragmatic would be to count the max of LU paid. It's not ideal but pragmatic. What is your view? 2) When animals are sold, the accounting of these animals in the RI will depend of the practices and interventions applied by the new owner. It is not considered double counting.
General question/comment (Art. 67)	EE	Art 67 Natura 2000 support for forestry does not have suitable result indicator under Annex I. In the current version of fiches, article 67 is listed under result indicators R.4 and R.7, but both of them are indicators for farms. R.4 is calculated based on number of hectares paid divided by total UAA. If Natura 2000 support is paid to forests then it is not part of the total UAA and the calculation of indicator would not identify the correct share of UAA. The fichee of R.7 calculates additional support for farms. It is not correct to include forestry support here. What could be appropriate result indicator for art 67 Natura 2000 payments for forestry or should we use program specific indicator?	As stated in the caveats for R.7, "Payment for area specific disadvantages – Natura 2000 and Water framework directive (Article 67) for all beneficiaries can be included here, although not all beneficiaries are farmers." If EE would like to have a separate common RI for Art. 67 support for forestry, this should be taken up with the Presidency.
I.20/C.21	EE	is the share of agricultural land covered with landscape features calculated based on UAA?	No, that is the reason why the COM has proposed an alternative label to this indicator.
I.18/C.35	EE	In the "Comments/caveats", it is written that the baseline year need to be defined? Who and when will decide this? In the "Comments/caveats" it is written that in Eurostat's database, data are presented with four different bases: 1990, 2000, the latest year available and the national base year. Does each Member state need to calculate and take into account all four different base. At the moment in Eurostat we see index with base year 2000.	The base year is indeed 2000, i.e. in 2000 the index value is 100. The baseline refers to the point of comparison. E.g. in the current CMEF, the baseline for most context indicators is 2013, i.e. the year before the implementation of the CAP 2014-2020. For the next period, this point of comparison is not yet determined.
I.19/C.36	EE	In the "Comments/caveats" it is written that, the mid-term evaluation of the indicator can be problematic due to the legal 6-year frequency of reporting obligations by MS. How do we address this issue and what are the solutions?	Evaluations will rely on available data only.
General question/comment (Double counting)	FR	Dans certains cas, éviter le double compte risque d'être complexe à mettre en œuvre. Pour les opérations mêlant subventions et instruments financiers : l'absence de doubles comptes entre bénéficiaires finaux d'instruments financiers et bénéficiaires de subvention est particulièrement complexe à instrumenter (les bénéficiaires finaux des IF ne figurant pas dans les outils de gestion mais sont remontés par les intermédiaires financiers sous forme de listes à une périodicité irrégulière, et pas forcément compatible avec les délais de préparation du RAP). Cette complexité semble disproportionnée au regard de l'enjeu. A titre d'exemple, l'EM devrait pouvoir choisir de remonter ou non le nombre d'agriculteurs bénéficiaires d'instruments financiers dans le R9, comme dans le cadre de la période 2014-2020 (les bénéficiaires des IF ne sont pas comptabilisés dans l'indicateur T4). Une exception au double compte serait également très utile pour la prise en compte des hectares de la mesure restructuration du vignoble, faute d'intégration des surfaces viticoles dans le SIGC (tolérance similaire aux hectares aidés F&L, à préciser dans les fiches indicateurs correspondantes).	a) In the next GREXE (January 2021), the Commission will address the recording of financial instruments in Annex I and cover your point; b) Regarding the wine area, the exception to double counting rule is already specified in the fiches. The Commission indeed wants to avoid disproportionate administrative burden.
O.19	FR	Number of supported local infrastructures and local services receiving support investment operations under EAFRD. La CE propose de supprimer la notion de « services ». Or les services et les infrastructures sont deux "outils" différents : les infrastructures sont des investissements structurants (par exemple : haut débit, dessertes forestières...), tandis que les services concourent à l'amélioration du cadre de vie, en particulier l'accès aux soins et aux services sociaux, l'accès à la culture et aux loisirs, la mobilité durable... Est-ce que cela revient à dire que les services financés sont classés comme des investissements non agricoles non productifs (et donc apurés au travers du O.20) ?	As explained in GREXE, this indicator covers both infrastructures and services. The Commission will make it clearer in the definition of the indicator in the fiche.
O.27	FR	Number of supported local development strategies (LEADER) or preparatory actions. L'ajout de « preparatory actions » apporte une certaine confusion ; le financement de la stratégie du GAL peut en effet d'ores et déjà intégrer des coûts de préparation des stratégies, sans qu'il ne soit nécessaire de l'afficher dans le titre de l'indicateur. Proposition : créer un output dédié au financement de la préparation des stratégies ? Ou proposer la modification suivante : « Number of supported local development strategies (LEADER) including preparatory actions »	The modification of the title to explicitly refer to preparatory actions was requested by MS and proposed by the FI Presidency. If FR believes that the formulation «Number of supported local development strategies (LEADER) including preparatory actions » is clearer FR can propose this change in label to the Presidency. Similarly, any proposal of additional indicator is to be addressed to the Presidency.
O.31	FR	La France est très réservée sur cet indicateur de réalisation hors apurement, qui s'annonce extrêmement complexe à calculer. • La fiche mérite des explications complémentaires, en particulier pour les sous-indicateurs attendus ; un exemple où seule la conditionnalité s'applique serait fort apprécié. En effet, les surfaces couvertes peuvent répondre à plusieurs définitions différentes (par exemple, certains éléments du paysage peuvent être admissibles pour une mesure et pas pour une autre). De ce fait, il paraît extrêmement complexe d'éviter des doubles comptes. • Est-ce que seuls les 3 sous-indicateurs de la partie méthodologie doivent être renseignés (dans ce cas, la conditionnalité n'est pas concernée par cette fiche puisqu'il est simplement question de ne pas comptabiliser ces surfaces). • Si la première partie de la case méthodologie décrit un élément à renseigner, qu'appelle-t-on « hectare soumis à la conditionnalité » ? En pratique, sauf évolution du projet de règlement, il s'agirait de tous les hectares déclarés. Si l'idée est de distinguer les hectares soumis à une BCAA en particulier il semble extrêmement complexe/impossible d'établir dans quel(s) cas un hectare doit être comptabilisé, ainsi que de concevoir des systèmes d'information permettant de distinguer les surfaces soumises à telle ou telle BCAA (même remarque concernant O32). La fiche indicateur mentionne les interventions sectorielles comme potentiellement couvertes mais la note de couverture ne l'indique pas. Le nombre d'ha devrait pouvoir être produit mais risque de double compte faute d'un référentiel des parcelles commun à tous les organismes payeurs.	a) O.31 renders the picture of the overall environmental/climate efforts stemming from CAP support. It is important to have an unambiguous representation of what the CAP delivers without double-counting; b) This is a synthesis indicator, without distinguishing areas under specific GAECs. Only the three sub-indicators are calculated under this indicator. If a farm is only subject to conditionality and does not benefit from any intervention supporting environmental practices the hectares of this farm would be counted for / feed the indicator as follows: - "Total agricultural area under environmental practices (conditionality or paid interventions)" – YES, all ha - "Total agricultural area paid for interventions" – 0 ha - "Total forestry" – 0 ha This is counted as the total of ha of areas AL+PG+PC of the farm. Some GAECs apply for the whole AL (GAEC 3 and 8), PG (GAEC 1), GAEC 7 (AL, PC) so each ha is subject to an obligation stemming from a GAEC even if there could be an overlap for some GAECs but this is not the focus of this indicator which measures overall environmental contribution/efforts made. A possibility of certain double counting where sectoral interventions are concerned (and some beneficiaries that are not farmers) is acknowledged by the fiche but the overall risk of this grandly affecting the result is deemed low; c) In addition, in relation to this indicator (as also O.32 and other relevant indicators), a project has been launched between DG AGRI and JRC in order to elaborate how to avoid double counting of areas for the calculation of output and results indicators of area-related interventions. Examples will be provided in the future when the project is more advanced in order to further clarify the methodology of calculation of these indicators.  The answers are provided based on the Commission proposal and might need to be revisited depending on the final outcome of the inter-institutional negotiations currently taking place.

O.32	FR	<p>La France est très réservée sur cet indicateur de réalisation hors apurement, qui s'annonce extrêmement complexe à calculer.</p> <ul style="list-style-type: none"> <li>• D'une part, définir quels sont les hectares couverts par une BCAE paraît difficile et peu pertinent pour nombre d'entre elles.</li> <li>• Quels seraient les hectares à prendre en compte concernant l'interdiction de brûlage des chaumes dans le cadre de la BCAE 3 ? Quels seraient les hectares à prendre en compte pour le total concernant la BCAE 9 qui comprend à la fois le maintien de particularités topographiques, une part minimale de surface agricole consacrée à des éléments non productifs (qui peuvent être différents des particularités topographiques), une interdiction de taille des haies et de façon facultatives des mesures destinées à lutter contre des espèces envahissantes ?</li> <li>• D'autre part, aujourd'hui le respect des BCAE est vérifié uniquement lors des contrôles sur place, et ne fait pas partie du contrôle administratif. Si la même logique était suivie dans la prochaine programmation (ce qui a priori devrait être possible), cela signifierait que certaines couches géographiques qui n'existent pas aujourd'hui seraient nécessaires pour renseigner l'indicateur O32 alors qu'elles ne sont pas nécessaires à l'instruction et au paiement des aides. Enfin, comment prendre en compte des hectares primés au titre de la restructuration du vignoble soumis à la conditionnalité pendant 3 ans pour conserver le bénéfice intégral de l'aide ?</li> </ul>	<ul style="list-style-type: none"> <li>• GAEC 3: The hectares counted are those of entirety of arable land of the farm</li> <li>• GAEC 9:</li> <li>• In terms of share: ha per LF/areas selected by Member States similar to the current EFA reporting</li> <li>• As regards the retention of LF, per type according to MS selection of LF that have to be maintained. Member States could select (some of) the same LF for both purposes (as currently under EFA/GAECs) but the hectares will be reported separately.</li> <li>• The Commission is considering whether a streamlined categorisation of LF compared to current EFA/GAEC indicative types could be feasible without losing the informative value of reporting and in terms of consistency with context/indicator</li> <li>• Measures to address invasive species: there is no obligation to report on ha under this measure</li> <li>• Ban on cutting hedges and trees: the ban applies to all hedges and trees during the breeding and rearing season and would be checked upon control. But trees and hedges are reported on only when selected by MS for the share and/or for the maintenance of LF.</li> <li>• In terms of maintenance of LF: If MS have developed maps of landscape features to be protected under GAEC 9, they could be used for the reporting of outputs on these mapping exercise rather than requiring farmers to do the measurements.</li> <li>• Nevertheless, some investment in appropriate tools depending on Member State's best preference might be necessary. Please note also that a project has been launched between DG AGRI and JRC in order to elaborate how to avoid double counting of areas for the calculation of output and results indicators of area-related interventions. Examples will be provided in the future when the project is more advanced in order to further clarify the methodology of calculation of these indicators.</li> <li>• The new conditionality will not cover anymore the new restructuration payments in the wine sector. Therefore, when a farmer only receive these payments, s/he will not be covered by conditionality and the area of the farm will not be counted in indicator O.32. If the farmer receives however payments outside the wine sector which are covered by conditionality, the whole area of the farm will be counted. Under the Council mandate for the SPR (new Art 140b(3)), the old restructuration payments in the wine sector will continue being covered by the old cross-compliance. As regards the declaration of area for O.32 however, Annex I of the SPR only mentions conditionality and the area of a</li> </ul>
R.30	FR	<p>La CE peut-elle confirmer que le nombre total de jeunes agriculteurs s'installant équivaut à une agrégation des 3 sous-indicateurs :</p> <ul style="list-style-type: none"> <li>• Nombre total de jeunes agriculteurs « femme » s'installant,</li> <li>• Nombre total de jeunes agriculteurs « homme » s'installant,</li> <li>• Nombre total d'entités s'installant (forme sociétale).</li> </ul> <p>Etudes de cas et proposition de simplification: [exemple envoyé par e-mail]</p>	<p>The Commission cannot confirm this yet, as during last GREXE (in November) some MS informed that the information on the gender of young farmers setting-up via groups or legal entities is available, included for the Pillar I young farmer complement. The Commission is planning to circulate a questionnaire among MS to gather information on the level of detail which can be expected from MS.</p> <p>Thank you very much for the example you provided, we will use it to provide guidance, once we know more on the data available by gender in MS.</p>
I.1, I.24	FR	<p>La Commission pourrait-elle préciser qui sera en charge du calcul de ces indicateurs d'impact : l'EM ou la CE ? Est-ce que ces indicateurs d'impact doivent être inclus dans le RAP et certifiés par l'OC ? Sous quelle forme ?</p>	<p>It will be done by the Commission based on the information notified by MS in APR, financial communications and under data needs for monitoring and evaluation.</p>
R.1	HU	<p>We ask the Commission to clarify with the Presidency what 'other cooperation groups/actions' means concerning R1 and how they can be taken into account?</p>	<p>The Commission considers term "other cooperation groups/actions" is confusing. Please address your concern to the Presidency who proposed this change. Even after the exchange at last GREXE (November), there is a lack clarity on why this would be needed.</p>
R.9a	HU	<p>Indicator fiche concerning R9a is not available. Please provide more details related to this indicator.</p>	<p>The fiche was shared with the Council WP in May 2019. It was dropped from the DE proposal, this is why it is not in the document shared in October at the GREXE.</p>
R.10	HU	<p>As Art 71 includes also interbranch organizations we believe that they should be taken account in R10 as well.</p>	<p>Indeed, this detail will be added to the content of the fiche.</p>
R.12	HU	<p>We propose to also include non-productive investments in this indicator.</p>	<p>No. It is not recommendable to include investments under this indicator as it relates to management commitments.</p>
R.17	HU	<p>How would agro-forestry investments be measured as „hectares“? E.g. if there is a plot of 5 ha with edge of 100 m x 15m, or a plot of 50 ha with edge of 100m X 15m ? Shall we count in the indicator only the space of the newly planted edge itself (0,015 ha in both cases) or the plot assisted with the positive effects of the edge: 5 or 50 ha?</p> <p>The contraction of the „results“ of afforestation and agro-forestry is also problematic since the afforested area is to be converted into forest area in reality and also in legal terms while the plots affected with agro-forestry will remain agricultural land.</p> <p>What is the definition of „reforestation“?</p>	<p>a) Member States may decide to use conversion factors to limit the necessity of a measurement of the specific area afforested, provided the minimum width will be assured.</p> <p>b) As a result of HU authorities question, the Commission realises that adding "results" of afforestation and agro-forestry might be difficult (because their difference in nature) and may lead to methodological problems. Therefore, the Commission will examine this issue further.</p> <p>c) Reforestation refers to the replanting of trees on more recently deforested land (i.e. converting recently non-forested land in forest).</p>
R.18	HU	<p>We propose to also include non-productive investments in this indicator.</p>	<p>No. It is not recommendable to include investments under this indicator as it relates to management commitments.</p>
R.18, R.20, R.21, R.22	HU	<p>Instead of focusing on UAA (Utilized Agricultural Area), we support the original version proposed by the COM referring to "agricultural land" in order not to exclude unutilized areas.</p>	<p>In the numerator the commitments on non utilised agricultural area are included. They are negligible and thus it is accurate to relate to the UAA in the denominator, for which there are well established ESTAT figures.</p>
R.22a	HU	<p>We propose to include eco-scheme and certain Natura 2000 operations (LU affected by extensive grazing) in this indicator.</p>	<p>The fiches will be adapted at the end of the legislative process. If the possibility to grant ecoscheme per LU is adopted, then ecoschemes will be listed under R.22a.</p> <p>The Commission would be interested to know which kind of intervention in Natura 2000 paid per LU HU refers to.</p>
R.23a	HU	<p>How can sectoral types of interventions (e.g. wine) take place "off farm"?</p>	<p>In the fruit and vegetables sector, certain types of intervention take place at the premises of the producer organisation and not at producer members' level. In the wine sector, pure wine producers (i.e. not having vineyards) are also eligible to support.</p>
R.27	HU	<p>Instead of focusing on UAA (Utilized Agricultural Area), we support the original version proposed by the COM referring to "agricultural land" in order not to exclude inland inundation, unutilized areas.</p> <p>We propose to include non-productive investments as well (or even Natura 2000 related measures) in this indicator.</p>	<p>1) In the numerator the commitments on non utilised agricultural area are included. They are negligible and thus it is accurate to relate to the UAA in the denominator, for which there are well established ESTAT figures.</p> <p>2) No. It is not recommendable to include investments under this indicator as it relates to management commitments.</p>
R.34	HU	<p>Should the denominator be the same as defined in "R.31a" or there is another delimitation tailored to these interventions?</p>	<p>The Commission confirms that the answer is yes.</p>
R.36	HU	<p>It is difficult to define exactly what kind of projects contribute to the prevention or reduction of antibiotic use. Could we give some more clarification on this and the difference between R36 and R38?</p>	<p>The scope of R.36 entails practices and investments improving resistance of livestock to disease or pest and reducing factors causing them.</p> <p>The scope of R.38 is broader including practices and investments that improve also other aspects of animal wellbeing (welfare) beyond health.</p>
R.38	HU	<p>We propose to include eco-schemes as well in this indicator.</p>	<p>The fiches will be adapted at the end of the legislative process.</p>
R.38a	HU	<p>Indicator fiche concerning R38a is not available. Please provide more details related to this indicator.</p>	<p>The fiche was shared with the Council WP in May 2019. It was dropped from the DE proposal, this is why it is not in the document shared in October at the GREXE.</p>
O.6b	HU	<p>There is incoherence in the use of units in case of the label of the indicator ('ha' or 'livestock units') and the description of the indicator (using only 'ha' in the definition, methodological description and unit of measurement). Please clarify which measurement is recommended.</p>	<p>Thank you for spotting this error. The Commission has adapted the fiche indicating "units".</p>
O.8	HU	<p>Hungary also considers it necessary to use uniform terminology in connection with indicators relating to each other, such as the R.5 and O.8 / O.8a indicators: see farmer vs. farm.</p>	<p>Output indicators refer to 'farmers' as defined in Article 3 of the SPR. By contrast, result indicators relate to a share of 'farms', because the statistical number of holdings used in the denominator is the closest to the concept of 'farmers' in the SPR.</p>
O.12a	HU	<p>In addition to "agricultural area", we suggest including "forestry area" as well. The reason behind this, is that in water source protection areas we often plant protected forests, and this way, forestry could also contribute to O12a indicator.</p>	<p>This is not possible as Art. 67.3(c), with regards to the Water Framework Directive refers only to agricultural land.</p>

I.17/C.37	HU	<ul style="list-style-type: none"> <li>We suggest clarification for the last line of the definition: if WEI+ &lt; 20% = non-stressed area; &gt;= 20% &amp; &lt;40% = under stress; &gt;=40% = severe stress and clearly unsustainable resource use. As an impact indicator for the CAP, two specific indicators could be derived from the Water use (not from WEI+):</li> <li>A specific indicator expressing the relative pressure of agriculture compared to other economic sectors, at national level and on an annual basis. Water use= Abstraction – Return (all economic sectors covered, including non-profit sector e.g. communal drinking water supply and sanitation) AWUR = Agriculture Water Use Rate AWUR =Water Use by agriculture (in year X) / Water Use by all sectors (in year X)</li> <li>A specific indicator expressing the change over time in the volume of water used by agriculture, at national level and on an annual basis. Water Use by agriculture (in year X) / Water Use by agriculture (in reference year)</li> <li>What do we mean by agricultural water use (e.g. irrigation, animal husbandry, fish farming, food industry, greenhouse heating)? Could we get a more precise definition for it?</li> <li>How do we evaluate the result of the specific indicators? e.g. if AWUR&lt; 20% = non-significant pressure of agriculture; &gt;= 20% &amp; &lt;40% = agriculture water use significant; &gt;=40% = very significant agriculture water use. The change over time is significant if in year X &gt;105% or &lt;95% where reference year =100%</li> </ul>	<p>I.17/C.37 (WEI+) is conceived to monitor the pressure on the water used in agriculture with respect to the renewable water resources, is comparable between different sectors and can be used to infer the sustainability of the use of water. These analyses are not possible with the sub-indicators proposed.</p> <p>The text in the last line of the definition provides reference values for the analysis of this indicator. For WEI+ values below 20% the area is considered non-stressed, areas with WEI+ values between 20 and 40 are considered under water stress and areas with WEI+ values over 40% are considered under severe stress and clearly unsustainable resource use.</p> <p>The data used for the calculation of this index is provided by the MS through the WISE-SoE system: (<a href="https://rod.eionet.europa.eu/obligations/184">https://rod.eionet.europa.eu/obligations/184</a>)</p>
I.15/C.38	HU	We suggest using aggregated rolling data calculated from several consecutive years concerning Phosphorus: e.g. (GNB-P in year X + GNB-P in year X+1 + GNB-P in year X+2)/3	This indicator is computed on annual basis by EUROSTAT, the values reported in the monitoring and evaluation framework and further analyses can include an average for several years in line with other indicators.
I.16/C.38	HU	For groundwater, the results will not show the current loads, but only the current situation, i.e. status of groundwater, as the effect of past loads affects results of water quality monitoring.	This indicator provides the best possible measurement of the effect of nutrient surplus in ground water and a direct link with the territory as it is based on field measurements, allowing focusing areas with problems. On the other side, the current loads can be monitored with I.15/C.38 (GNB) that provides the best possible measurement of current loads.
I.26/C.47	HU	Data collection: National data of antibiotic use are not currently available on farm and sectoral level.	The indicator's unit of measurement is sales and not use of antimicrobial substances corrected by PCU at national (NUTS 0) level. This data is already collected by ESVAC. Indeed, as noted in the fiche for this impact/context indicator, the collection at farm level and per species will only be applied from beginning 2022 with the entry into force of the new Regulation on veterinary medicinal products.
R.30	IE	This indicator is in Annex I but the indicator fiche includes an additional four sub-categories. If a MS selects R.30, will it be mandatory to report on the aggregate indicator value and the four sub-categories? We note the comment that these sub-indicators are not to be planned or used for performance review.	Yes, in case a MS selects R.30 it will have to report on the sub-categories as well. In addition, given the ringfencing on generational renewal, it would be difficult for a MS not to select R.30.
General question/comment (Reporting partial outputs)	IE	Ireland believes that reporting partial outputs is confusing and unnecessary. Partial reporting is to be required under: O.1, O.2, O.5, O.6, O.8, O.8a, O.11, O.12, O.12a, O.13, O.14, O.14a, O.15, O.15a, O.16, O.17, O.18, O.18a, O.19, O.20, O.21, O.22, O.23, O.23a, O.24, O.25, O.26, O.27, O.28, O.29 and O.29a. The addition of these additional reporting requirements will require Member States to have an IT system that incorporates multiple and complex data values.	In the logic of the new delivery model, where eligible expenditure is matched by a corresponding output, the financial planning should reflect the methodology for advances and partial payments in the performance clearance. Thus, partial outputs should be reported in the Annual performance report, otherwise expenditure will not have a corresponding output in the financial year in question. Consequently for several interventions, there will be a number of years with mismatch between expenditure and outputs. Moreover, reporting on partial outputs can be useful to follow the MS progress towards the Strategic Plan implementation. Reporting of partial outputs should be set in the MS IT system in advance to enable correct reporting of outputs.
General question/comment (Monitoring indicators)	IE	Ireland requests that the number of sub-indicators and output indicators not used for performance clearance should be outlined separately. The purpose of the monitoring indicators proposed during the Croatian Presidency was to outline this. Although the monitoring indicators do not need to be in Annex 1, they should be included in the indicator fiche package and clearly identified as separate reporting requirements.	The distinction between "output values used for performance clearance" and "output values not used for performance clearance" is clearly indicated in the Cover note (pages 2-6). Nonetheless, the Commission could add to all O.I fiches under "Methodology for the aggregated values" the indication "Not used for performance clearance".
General question/comment (Sectoral interventions)	IE	Ireland supports the inclusion of Article 41c and therefore supports the removal of the reference to sectoral interventions under O.8, O.13, O.15, O.15a, O.16, O.18, O.18a, O.20, O.21, O.25 and O.29. Ireland queries why sectoral interventions are included under the 'type of intervention' in multiple result indicators? Surely the simplification should also transfer to the result indicators and therefore only R.10 and R.11 should be relevant for sectoral interventions.	For the result indicators, R.10 and R.11 are obligatory for the member states. However, sectoral interventions do contribute substantially to further aspects and, therefore, are accounted under result indicators other than R.10 and R.11 (e.g. R.5 Risk management or R.9 Farm modernisation). MS would have to plan and report also the other result indicators to which sectoral interventions contribute significantly and directly. The decision regarding the result indicators to which sectoral interventions contribute significantly and directly is left for the MS. In the indicator fiches the potential candidate interventions are listed.
O.13	IE	Ireland does not understand the rationale behind the exemption for beehives in this indicator. There may be other units such as bat boxes that fall into the same category exemption. It would be preferable to include units in the title of this indicator. Ireland also suggests including O.13a for the number of agricultural units other than hectares to be consistent with O.14 and O.14a.	The Presidency has proposed an indicator O.14a for management commitments paid by units other than hectares. A broader reflection on the Units which could be used is necessary.
O.15	IE	Ireland believes that reference to 'livestock' should be removed from the definition of O.15 (O.15: number of ha with support for organic farming). Instead, livestock should be included under O.15a (O.15a: number of units other than ha with support for organic farming).	Thanks for spotting, the Commission will correct the fiche.
O.15a	IE	Ireland asks the Commission for clarification re the note on the green box.	Payments per LU are not decoupled from production, this is why they are not WTO green box.
O.27	IE	Ireland is still concerned with regards planning the number of LDSs in the first year of payment – this will lead to confusion for stakeholders. Furthermore, how should the average unit amount be calculated if a Member State expects that all LDSs may not receive a payment in each year (especially at the start and end of the programme)? For example, about two-thirds of LDSs in Ireland received a payment in the first year of implementation of the current programme. Should the planned average unit amount be calculated on the overall expenditure and overall number of LDSs or should an annual planned average unit amount be calculated based on the number of LDSs we expect to pay in each year?	MS should calculate the average unit amount based on the number of LDSs expected to be paid each year, as this is what MS will be reporting.
O.24, O.26, O.27, O.28	IE	Ireland queries whether it is necessary to state in the 'Comments/caveats' section that the indicator covers "Beneficiaries of support covering only the cost of the operation but using funds from other types of interventions for project implementation (e.g. investments). In this case, however, the project implementation is covered by the corresponding indicators (e.g. for investments), and not by this indicator." For example, Ireland would appreciate clarification on where LEADER investment type projects should be reported – if funded under the LDS, surely the project is covered by O.27 and should not be counted under any additional output indicators.	<p>a) Yes, the Commission considers this comment/caveat necessary, also taking into consideration that all the support granted under Art 71 for the POs is accounted here. However, thank to your comment, the Commission noticed a typo in the fiche, which will be corrected ("Beneficiaries of support covering only the cost of the cooperation but using funds from other types of interventions for project implementation (e.g. investments)").</p> <p>b) Regarding the specific example provided, in the framework of implementation of LEADER intervention, LAGs should report only against RI specific for LEADER interventions as defined in the Plan. However, if a LAG is also beneficiary of another intervention outside LEADER, then it will have to follow the reporting obligations upon the beneficiaries of that intervention.</p>
General question/comment (Art. 71)	IE	Ireland queries if Article 71 should be included in the 'type of interventions' section for the majority of indicator fiches. For example, EIPs may contribute to any number of RIs e.g. Ireland's successful locally led EIPs focused on Hen Harrier and Freshwater Pearl Mussel would contribute to R.27.	The Commission is not prescriptive in the types of interventions listed as potentially contributing to result indicators. The choice should be made in accordance with the design of the intervention (in terms of objective and unit). Where this justifies establishing a link and allows for the computation of the result indicator, the intervention should be included, otherwise not. It should be noted that in some cases (e.g. EIP groups), as explained in indicator fiches and in the cover note, individual operations within an intervention may contribute to different RI(s) depending on their specific characteristics.
R.1	IE	If double counting is allowed, could the share be greater than 100%?	The unit of measurement of R.1 is "number of persons" not %. Therefore, it cannot be greater than 100%
R.11	IE	Ireland maintains our earlier request for direction on how to plan this indicator in the CSP, particularly in relation to transnational POs.	Planning of R.11 does not fundamentally differ from planning of other result indicators and would be based on MS experience, policy choices with regard to sectoral interventions and past performance of the POs in a given sector in that particular Member State. Transnational POs would be covered by the MS where the headquarters of the transnational PO is located as the PO is under the jurisdiction of and is accountable for this MS.
R.13	IE	Ireland queries why interventions under Art. 65 are no longer included under 'Types of interventions concerned'?	R.13 relates only to interventions paid per LU, while interventions under AECMC are paid per ha (except for animal welfare and endangered breeds).
R.17, R.17a	IE	What is the difference between R.17 and R.17a?	R.17 reports the hectares of area afforested, while R.17a relate to any kind of investments in forestry (e.g. a road for fire protection, afforestation...).

R.18, R.38	IE	Ireland does not support the inclusion of the list of actions that can be supported under these Result Indicators. The indicator fiches should not be used to incorporate additional regulatory provisions.	Could IE please explain as nothing was added compared to the version of the fiche circulated earlier?
R.30	IE	Is this indicator only concerned with installation of young farmers under Article 69? If so, the original indicator title is more appropriate. Furthermore, Ireland does not support the splitting of this indicator by gender.	The indicator concerns Art. 69.2(a) the installation of young farmers and Art. 27 complementary income support for young farmers. IE does not support the split of the indicator by gender. Could you please explain if you have any technical issue with this split?
R.31a	IE	Ireland can support. Ireland would appreciate clarification on the planning of LEADER result indicators – what legal provisions allows LEADER result indicators (besides R.31a) to be planned after the selection of the Local Development Strategies? Ireland welcomes the provision and would like legal certainty on this point.	The alternative for an ex-ante planning of all LEADER contributions to the CAP Plan RI and the related targets has been described in the cover note on output and result indicators shared with the Working Party in spring 2019 under the Romanian Presidency. It contains a dedicated section on LEADER, (chapter 4: “[...] connected to specific objective (h) “promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry” [...]).
I.3/C.24	LT	What is meant by variation, is it just a change? If not, please provide e.g.	Yes, it means change.
I.2, I.3	LT	In I2 and I3, and other relevant, please provide details of „etc.“: variable input costs (fertilisers, pesticides, feed, etc.). It should be clear at EU level. (for example, overheads, contracted work?)	Variable input costs correspond to ‘total intermediate consumption’ in Eurostat’s economic accounts for agriculture. This is an aggregate that is readily available but which has a somewhat technical name (which is why we called it ‘variable input costs’ in the fiche and some examples are provided). In order to make it clear without adding a long list of components, we modified the fiche simply replacing ‘variable input costs (fertilisers, pesticides, feed, etc.)’ with ‘intermediate consumption as defined in Eurostat’s ‘Manual on the economic accounts for Agriculture and Forestry’.
I.4/I.5/C.26	LT	indicator name – farm income by farm type, however indicator definition is expressed by farm net value added. Names and descriptions should be consistent	There is no inconsistency, as the farm net value added is one way to measure income. It would be too technical to precise in the title the Farm Net Value Added, and not all users might rapidly identify this as farm income.
R.1	LT	Indicator label proposed by the Presidency is not fully in consistency with the “Types of intervention concerned”. More clarity is needed on the newly added “other cooperation groups”- does it refer to PO, LAGs also? If yes, Types of intervention should be adjusted in terms of Article 71.	The Commission considers term “other cooperation groups/actions” is confusing. Please address your concern to the Presidency who proposed this change. Even after the exchange at last GREX (November), there is a lack clarity on why this would be needed.
R.31	LT	The remaining question is on the calculation of the jobs when the applicant is young farmer – legal entity / holding consisting of multiple members? Does the methodology of R.30 should be applied accordingly?	The same approach should be followed for R.30 and R.31.
R.32	LT	Does the term “business” mean “operation”? We see that cases where the applicant is engaged in several different businesses are possible. For example, mobile hairdressing services and food production and delivery, and the main investment via project is a vehicle. How to estimate the number of businesses in this case?	If the concern relies on the fact that three businesses are using the same vehicle, then all three businesses should be accounted. However, this also depends from the way the intervention was designed. The Commission invites LT authorities to provide further details for a more accurate reply.
R.36, R.38	LT	The sentence „Member States are not expected to identify the livestock units supported but the beneficiaries” in the Methodology section is misleading. We propose to use another wording: “Where a livestock unit is supported from multiple interventions, that livestock unit should be counted only once”.	The fiche was modified. Thanks.
General question/comment (Indicators linked to green investments)	LT	(R.16a, R.23, R.23a, R.27a) we see a serious challenge, firstly, how to clearly define them, secondly, how to set the demarcations among them. In our opinion, there is a risk of overlapping of the categories of green investments and the double counting in terms of calculation of these indicators. Considering the lack of experience, we would appreciate guidance, training or further discussions on these issues. In addition, concerning fiches of R.16a, R.23, R.23a, R.27a we have question regarding the provision saying that “in some cases only certain operations within an intervention may be concerned”. Do we understand correctly that several Result indicators can be planned within one intervention in the CAP Strategic Plan (whereas some operations contribute to one Result indicator, another operations – to another Result indicator)? Do we treat right that one operation (project) could contribute to several / different Result indicators?	The Commission is not prescriptive in the types of interventions listed as potentially contributing to result indicators. LT is correct on both counts: an individual operation may contribute to more than one result indicator – as it may contribute to several objectives – for example, modernising a cattle shed/dairy parlour would be a productive investment, which could also generate renewable energy (through heat recuperation when cooling the milk, or through solar panels on the roof) and also improve water quality and reduce greenhouse gas emissions (through improvements in associated manure storage). All these benefits should be captured by linking the operation to the relevant result indicators. Another operation supported under the same intervention may not include so many elements, and therefore would not be linked to so many result indicators. The appropriate linkages have to be determined on a case by case basis during the project assessment/approval process.
O.4	LT	Why the same indicator name O.4 for both - total decoupled direct payments and BISS (does the primary O.4 remains)?	The set of indicator fiches circulated covers both the Commission proposal (O.4 for total decoupled DP) and the Council proposal (O.4 for BISS) in order not to preempt the outcome of the ongoing trilogues.
O.5	LT	Only the total number of beneficiaries of decoupled is written here, and to the methodology (the lines before it), the number of beneficiaries is calculated not by the total, but by the intervention. However, then output indicator does not ask for the number of beneficiaries of the CRIS measure. Why?	The fiche O.5 corresponding to the Commission proposal refers to the number of beneficiary per intervention (included for CRIS) and for decoupled DP taken together. In all fiches the details by intervention are requested as well as the aggregate.
O.6	LT	O.6. Clarification is needed: should we include both, new applicants from 202X-2027 and those from the previous (2014-2020) and transitional period?	For EAGF, this is not the intention to flag these items (old, new, transition...). Due to the steady yearly cycle of Direct Payments, it is not really needed.
O.6a	LT	Should there be a comment like in O6: „the value of this indicator should be equal to the value provided under O.4 for the complementary redistributive income support for sustainability”?	Not really as if the Council Proposal is adopted, O.4 will relate only to BISS.
O.9	LT	Concerning the provision „Following aggregates should be provided” what is meant by a number of hectares for groups of CIS? Whether the area covered by the CIS intervention includes either ha based on just each scheme, or some groups inside of those schemes?	For example: if there are 3 VCS interventions on protein crops (protein crops I, protein crops II and protein crops III), an aggregate by sector (in this case protein crops) as set in Article 30 SPR is expected (without double counting).
R.16a, R.23, R.27a	NL	Reporting of farms or farmers: We have investment measures specifically targeted at young farmers, not farms. Young farmers often have farms in partnership with farmers who are not young farmers. These investment measures are targeted at the young farmers because a young farmer often lack the funds for investments in for instance climate, while an investment at a young farmer has potentially longer lasting influence. This will of course also have impact on the holding they are part of, but it is the young farmer who is the beneficiary. We do not see a clear methodology why some of the result indicators are at farm level and some at farmer level. As these result indicators all concern investments, we feel one choice should be made. We would also think that it could be more clear that farm and farmers are interchangeable and depend on what level the investments are programmed.	All indicators relate to a share of farms, because the statistical number of holdings used in the denominator is the closest to the concept of ‘farmers’ in the SPR Regulation used for output indicators. Having said that, the title of R.23 as proposed by the Commission should be changed to ‘Share of farms’. We will add an alternative label.
R.12, R.13, R.36, R.38	NL	Double counting in the Numerator: We notice a difference in the Methodology of the numerator between R.12/R.13 and R.36/R.38 and wonder if it would be possible to make the methodology of R.12 consistent to that of R.36/R.38, by identifying not the LU supported but the beneficiaries.	Very good idea. Thanks, we will adapt the fiche.
R.1, R.24	NL	Apiculture program: In indicator R.1, under Comments/caveats, the Comment/caveat is added: “Regarding the implementation of research programs in apiculture, all participants to the research activity (including scientists) are to be accounted.” We are interested in the reason why this remark was added to the fiche of R.1, but not to R.24. In the apiculture program of the Netherlands, R.24 may be more relevant than R.1.	Thanks for spotting, we will adapt the fiche.
R.5, R.9, R.10	NL	Number of beekeepers: In indicators R.5, R.9 and R.10, the denominator is: “Total number of farms - EUROSTAT (Farm structure survey) plus the number of beekeepers not already accounted in Eurostat.” We propose to not count the number of beekeepers in the denominator, because it is not always considered meaningful in the context. We think it is complicated to establish the number of beekeepers, especially since it is not clear whether only large or professional beekeepers need to be included.	Due to the large share of beekeepers directly/indirectly benefiting from sectoral interventions in apiculture, adding the figures to the number of farmers-beneficiaries would mask the progress in implementing other measures than apiculture. For this reason, the Commission takes into consideration the possibility of removing apiculture from all the result indicators (i.e. R.5, R.9 and R.10) and add a specific result indicator for apiculture, namely the “Share of beehives supported with the CAP”. Please address this issue directly to the Presidency.



R.35, R.32, R.9	PL	<p>Regarding small farms scheme and considering the latest proposal of EC (presented at the meeting of GREX Group) we are not sure if the linkage between this intervention and indicator R.35 (result) is a good approach. In Poland, this measure (Development of small farms under Article 69) is most accurate to be programmed under the specific objective 2 due to the fact that it is linked directly to enhancing market orientation and increasing competitiveness of small farms.</p> <p>Therefore, Poland had already presented a solution enabling to include the small farms under indicator R.9 by deleting the word "investments". However, this proposal has not been accepted by the EC.</p> <p>Taking the above into account, we have reconsidered the list of indicators and came to the conclusion that the most appropriate indicator for our intervention would be R32 Developing the rural bioeconomy: Number of rural businesses including bio-economy businesses developed with CAP support.</p> <p>However, in the comments to the fiche for R32 it is indicated that farms developed with CAP support shall be covered in R.9 which may suggest that the intervention shall only concern investment support provided under Article 68.</p> <p>It should be emphasized that the aid (under Article 68) is to be granted on different terms (e. g. may take the form of reimbursement of eligible costs) than that under Article 69 (grant support in the form of lump sums) and therefore is not suitable for the intervention <u>Development of small farms under Article 69</u>.</p>	As indicated by PL authorities, the Commission considers R.32 unsuitable to cover Art. 69. The Commission proposed to include this type of intervention (Art. 69 Installation of young farmers and rural business start-up) under R.25 on social inclusion. However, this indicator was regrettably dropped by the Presidency. Should PL authorities deem necessary adding a new common result indicator to cover this intervention, their request should be addressed to the Presidency.
General question/comment (Livestock Units)	SE	<p>Sweden has some questions regarding the list with coefficients for converting animal numbers to livestock Units. Are the coefficients provided by Eurostat replacing earlier coefficients and should these coefficients be used for all interventions, including organic farming and areas with natural constraints?</p> <p>The coefficients provided by Eurostat are more detailed than the previous ones in regulation 2016/669 annex II. For example, dairy cows, other cows and heifers above two years are now three separate entries. Earlier there was just one entry for bovine over two years. Is it possible to use a more simplified list? In the Swedish register, it is not possible to distinguish between dairy cows and other cows.</p> <p>In the coefficients provided from Eurostat, sheep is 0.1 LU. Sweden believes that is too low for Swedish conditions. What procedure should Member States use to be able to apply a more appropriate coefficient?</p>	In the current version of the fiches, the Commission cannot refer to a regulation that will not apply anymore in the next programming period. However, several MS pointed at the need of a simplified list of coefficients and the Commission will take this into account when drafting the implementing acts.
R.12, R.13, R.22a	SE	<p>The Commission answered in the written answer (WK 7390/2020 INIT) and explained during the presentation at GREXE 2020-10-01 that Member States are not required to keep track of individual animals. The Commission said in the written answer that the updated fiches would include these modifications. Fiches for the new indicator R.12 suggested by the presidency, R.13 suggested by the Commission and the new indicator R.22a include in the methodology part the words "physical animals". Sweden propose to delete the reference to physical animals in the methodology part of these fiches.</p>	Thanks for spotting, we will adopt the same wording for all the animal related indicators.
R.31	SE	<p>Complementary income support for young farmers is added to R.31 (creating jobs in rural areas). If complementary income support for young farmers is included in R.31, the indicator will be more complex due to the fact that the complementary income support is area based. Sweden considers the main purpose of the support for young farmers to be generational renewal. Thus it does not automatically create new jobs, but rather maintain jobs. Therefore, Sweden suggests not to include complementary income support for young farmers in indicator R.31.</p>	The rationale to include Pillar I young farmer payment under 'R.31 Jobs created' is the same as for the inclusion of the Pillar II installation grant. Both aids have the same objective: generational renewal. In both cases, it can happen that young farmers take over an existing farm, but it could also be argued that without this support the generational renewal could not take place, leading to job losses. MS are free in their Strategic Plan to use one or both instruments in their strategy to support young farmers setting-up. The 2% envelope obligation applies to both. The difference between the two schemes is that the Pillar II support is granted to set-up and the Pillar I support once sat-up. Many young farmers receive both support and they will be accounted only once anyhow, thanks to the use of the unique beneficiary identifier. The moment of data collection is the first time the beneficiary is paid the complementary income support in this programming period. To know more how to combine under this cumulative indicator annual payments and RD support, see the example 1 presented in Annex III of the cover note circulated end of 2019.
R.31a	SE	<p>The indicator measures the share of population covered by local development strategies but in the fiche's section of data collection the indicator is described as cumulative. Sweden is hesitant to describing R.31a as a cumulative indicator.</p>	It is described as cumulative because the approval of LDS strategies take time and in the first years this indicator is increasing. In the current programming period, the indicator increased from 21% in 2015 to 60% in 2018 at EU level.
O.3	SE	<p>The Commission has added a comment saying that information by intervention relates to all direct beneficiaries but the aggregated figures relates only to farmers. Sweden would like a clarification as to why the Commission suggest different methods for these values</p>	Most interventions directed at farmers are distinct from those with other kind of beneficiaries. Therefore looking at the total number of beneficiaries by intervention is meaningful. By contrast, for the aggregate figure it is more accurate to sum up only farmers (to avoid adding beneficiaries such as farmers, mutual funds, training organisers...).
O.20	SE	<p>In the "comments" section of the fiche it states that "On-farm non-productive investments are to be reported under O.20". Sweden assumes this is a typing error and believes on farm non-productive investments should be reported under O.18a (Number of supported on-farm non-productive investment operations or units receiving support under EAFRD)</p>	Thanks for spotting, we will correct the fiche.
O.31	SE	<p>Sweden has some doubts regarding this indicator, see previous comments (i.e. WK 13951/2019 ADD 9, WK 6635/2020 ADD 10, 200207 written comments from Sweden) and prefer to keep the indicator deleted. Because the indicator still has a fiche, Sweden inquires for the example that is mentioned in the fiche but never presented.</p>	The example was presented in GREXE on 3.10.2019. This indicator is key to monitor the coverage of environmental practices, including conditionality and management commitments in the EU.
General question/comment (Complementary result indicators)	SE	<p>Sweden is of the opinion that Annex I and XII regulate the indicators that can be planned and reported in the new CAP and is concerned regarding complementary result indicators (CRIs). The commission has mentioned in passing that CRIs from the current period will continue in the next period or that replacements for the existing CRIs will be drawn up and presented in due course.</p> <p>The Commission said in their presentation that there will be a successor of the CRIs R.14 (Increase in efficiency of energy use in agriculture and food-processing in RDP supported projects) of the current period. We are uncertain what role and function the CRIs will have in the next period given the new delivery model. Are Member States expected to set targets for any CRIs in the coming period?</p>	Member States are not expected to set targets for CRIs, they will be used for evaluation purposes only.
R.16	SE	<p>The updated fiche for R.16 (Enhance energy efficiency) has also a note saying, "This indicator has though a very good informative value and should be reported anyhow by MS". The fiche said that the methods are in line with the Energy Efficiency Directive. Does the Commission have the legal basis to regulate the planning and reporting of the new CAP by other directives?</p>	The reference to the Energy Efficiency Directive signals that the method is consistent and thus it re-enforces the usefulness of calculating this indicator for the CAP.
General question/comment (Additional indicators and Green Deal)	SE	<p>The presidency deleted R.21 (Sustainable nutrient management) and R.29 (Preserving landscape features) but in a footnote in the fiche, the Commission refer to the Green Deal target. Does this mean that the Commission can regulate additional indicators for the new CAP?</p>	The set of indicator fiches circulated covers both the Commission proposal and the Council proposal in order not to preempt the outcome of the ongoing trilogues. The final set of indicator fiches will be revised once the final text is agreed by colegislators.

General question/comment (calculations and linkages between indicators and SO)	SI	In the phase of preparing intervention strategy of the CAP strategic plan, we have question about contribution of individual interventions to the relevant result indicators. In particular, Annex 1 of the proposal for a regulation on strategic plan sets out the result indicators by individual specific objectives. Eg. indicator R.39 Organic farming: Share of Utilized Agricultural Area (JAA) supported by the CAP for organic farming maintenance or conversion is placed under specific objective 9 "improve the response of EU agriculture to societal demands on food and health, including safe, and nutritious and sustainable food produced in a sustainable way, food waste, as well as animal welfare". In our case, environmental, climate and other management commitments (Article 65) are planned to be programmed under specific objective 5 "Foster sustainable development and efficient management of natural resources such as water, soil and air". Can the areas included in organic farming interventions also be counted in other result indicators (such as R.39) and not only as indicators provided for in specific objective 5 (R.18, R.19, R.20R.21, R.22, R.22a)?	R.39 is not 'placed' under SO9, Result Indicators can be linked to several SO depending on scientific evidence and on the intervention logic developed by MS (this is why there is an empty column in Annex I between impact and result indicators). Having said that, for more clarity we have already proposed to the Presidency to place R.39 higher in the list between SO.5 and SO.6.
R.31	SI	During the last GREXE meeting (1/10/2020), DG-AGRI asked to send our clarification about how we implement submeasure M06.1 RDP 2014-2020.  In Slovenia, this submeasure is divided in two parts: A) with employment of young farmers and B) without employment. In this relation, also final amount of payment for young farmers is different (45.000 € in case with employment and 18.600 € in other case). In almost all cases, takeover of the farm is based on inheritance. In this context, there is actually no cases of establishing new farm as legal entity. The same situation appears under support for young farmers in Pillar I, where in this programming period, only 10 beneficiaries were legal entity vs natural person. For this reason, the result indicator R.31 Growth and jobs in rural areas would not be proper one for intervention Complementary income support for young farmers (CIS-YF) (Article 27) for young farmer payment under Pillar I (no data). Calculation of number of jobs of young farmers would therefore be possible only under intervention Installation of young farmers and rural business start-up (Article 69).	The rationale to include Pillar I young farmer payment under 'R.31 Jobs created' is the same as for the inclusion of the Pillar II installation grant. Both aids have the same objective: generational renewal. In both cases, it can happen that young farmers take over an existing farm, but it could also be argued that without this support the generational renewal could not take place, leading to job losses. MS are free in their Strategic Plan to use one or both instruments in their strategy to support young farmers setting-up. The 2% envelope obligation applies to both. The difference between the two schemes is that the Pillar II support is granted to set-up and the Pillar I support once set-up. Many young farmers receive both support and they will be accounted only once anyhow, thanks to the use of the unique beneficiary identifier. The moment of data collection is the first time the beneficiary is paid the complementary income support in this programming period. To know more how to combine under this cumulative indicator annual payments and RD support, see the example 1 presented in Annex III of the cover note circulated end of 2019.
R.36	SK	Coefficient for LU conversion: Payments for AW measures will be calculated by coefficient. Indicators will be calculated in a different way, or different coefficient? Or will the new legislation not define the conversion to LU and should a statistical conversion be used?	In the current version of the fiches, the Commission cannot refer to a regulation that will not apply anymore in the next programming period. However, several MS pointed at the need of a simplified list of coefficients and the Commission will take this into account when drafting the implementing acts.
R.8	HU	What would be the calculation method if 8-10 different sectors are subject to this scheme? How to make one single value? What would the value of this indicator mean? What would be assessed as a progress in the right direction? Can an increasing share be assessed as good progress, since showing that CAP resources are important in a certain sector? Or e.g. a decreasing trend could be a sign that the sectoral output has increased. It is therefore difficult to judge the progress because the coupled support element is a stable yearly value, while the output may vary year-by-year.	The difficulty to split by sector and to use outputs is acknowledged by the Commission and no change in the fiche was in the end proposed. A single value can be used for all sectors when referring to 'farms'. The assessment of MS progress in the implementation will be measured thanks to the progress to target, while the target level will be set so that to address the needs of the various sectors.
R.8	HU	Finally, it would be essential to know in which result indicator(s) would sectoral interventions belonging to „other sectors“ be incorporated/taken into account. For the apiculture and the wine sector, we cannot use R.10 or R.11, therefore R.8 was identified as the only option so far.	The potential links between sectoral interventions and result indicators were presented in a Table in Annex I of the cover note. E.g. investments supported in the wine sector are to be reported under R.9 if realised on farms and in R.32 if realised in a cooperative.
R.10	HU	How should the leaving or inactive members of supported producer groups be taken into account when determining the value of indicator R.10? When evaluating progress, should a cumulative value based on the aggregation of annual data be taken into account in the calculation of indicator R.10? Only R.10 and R.11 can be considered for the fruit and vegetable sectors or other indicators as well? On the basis of point a) paragraph (7) of Article 44 at least 15% of the expenditure in the fruit and vegetable sector shall cover interventions linked to the specific objectives set in points d) e) f) and i) of Article 6. Document WK 7773/2020 INIT says that the relevant result indicators to be used for the performance review for the types of interventions referred to in point (a) and in points (d), (d),(e) and (f) of Article 39 that are implemented through operational programs are the indicators R10 and R11. If only those two indicators will be used for the performance review of interventions implemented through operational programs how would be possible to assess – the use of this 15% of funds, – the contribution of the sectoral Type of interventions to the specific objectives set in points d) e) f) and i) of Article 6. Does this restriction apply to the wine sector and apiculture as well?	a) All members who are officially members of the supported producer group should be counted, regardless of their activity; b) Yes the indicator is cumulative; c) R.10 and R.11 are obligatory for member states implementing operational programmes. However, MS would have to plan and report also other result indicators, to which sectoral interventions contribute significantly and directly. The decision regarding the result indicators to which sectoral interventions contribute significantly and directly is left for the MS. d) Minimum percentage linked to environment and climate change mitigation in the F&V sector counts towards expenditure not towards results. The minimum percentage for the expenditure is verified and approved at the phase of adopting the operational programmes and at the time of payment by the Member States; e) No, this applies only to F&V. However, according to the Commission proposal MS should lay down a minimum percentage of expenditure dedicated to environmental measures in the wine sector too.
R.12, R.18, R.27	HU	Due to the environment and climate requirements of conditionality, we recommend to add 'BISS' to the types of interventions concerned	Result indicators focus on measuring CAP environmental and climate action supported beyond the mandatory elements of the baseline (including conditionality).
I.18/C.35	HU	HU welcomes and supports the continuation of use of Farmland bird index as PMEF indicator. Keeping FBI as an impact indicator results the continuation of impact indication of Common Agricultural Policy and to a certain extent contributes to the comparison of the achievements of different budget periods. In our consideration the analyses of FBI trends at MS level in a timescale does not ensure the adequate causal linkage between CAP instruments and their impact on biodiversity – due to the several intervening factors also mentioned by the indicator fiche. (HU applies a grouping of the FBI monitoring units (2,5 multiplied 2,5 km quadrates) based on the coverage of areas under CAP commitments. The FBI trends of the supported and not supported monitoring units are statistically compared in a timescale to identify the impacts of the CAP instruments.) Are there any MS practices, or other relevant experiences in the view of the Commission, which strengthen the causal linkage between CAP payments and FBI changes other than the country level trend analyses proposed in the indicator fiche? Can HU expect a methodological amendment of the indicator fiche in this respect?	As it is the case of other environmental, but also social and economic indicators, the causal link between indicators and CAP payments is most often not univocal. This is why evaluations are needed to quantify the net impact of the CAP on various indicators. Furthermore, the JRC work on farming practices is ongoing to collect results from scientific literature on the linkages between practices, objectives and indicators. The Commission is considering different ways to share the material with MS, with the first practices to be shared early in 2021.
I.19/C.36	HU	HU finds the implementation of the proposed new indicator reasonable, though for the reason of smooth implementation it is important to develop logical amendments, to set up causal linkages and recommendations mentioned before concerning I.18. FBI. Without these amendments (methodology to build up causal linkages between the CAP instruments and their impact on trends of species and habitats) the proposed indicator is rather considered as a descriptive indicator of the agricultural lands than an impact indicator of a payment system.	As it is the case of other environmental, but also social and economic indicators, the causal link between indicators and CAP payments is most often not univocal. This is why evaluations are needed to quantify the net impact of the CAP on various indicators.

I.20/C.21	HU	<p>The new indicator is being defined. The current interpretation of the indicator relies mostly on the elements of the VHR Small Woody Features thematic layer recently delineated in the Copernicus program. Several questions arise in connection with the indicator: The calculation of the indicator could also be extracted from national data, since the MePAR land cover database created in connection with the IACS MePAR e-application data is also available in Hungary. As a question of methodology, is the use of the SWF overlay recommended for uniform reporting, comparability and verifiability between Member States (mandatory)? In addition, can the data derived from the MePAR FSZB, which is more reliable in terms of geometric accuracy in the Member States and in the case of Hungary, be included in parallel or exclusively as an indicator value? How is UAA defined? How should landscape elements be located in space in order to take them into account? In contact, can they be at some buffer distance from the "agricultural area"? A landscape element can, of course, not just be a Woody Feature. How do you want to include other landscape elements in the system? In the case of Hungary, several (sometimes GAEC) elements were delimited and organized into thematic layers. Such is the case with the layer of "small lakes", which even includes the cubic pits of the Great Plain, but all permanent surface waters with an average extent not exceeding 0.5 ha. We recommend the inclusion of such layers, too. Among these, we also recommend the inclusion of the so-called aqueous layer and possibly the inclusion of a "saline" layer that is not currently complete in its geometry.</p>	<p>The Commission is currently working to develop an indicator on landscape features aimed at ensuring a homogeneous coverage across the EU. As an indicator, it will be a proxy to landscape features and it will not be aimed at providing a full measurement of them. However, the Commission intends to add additional layers representing additional landscape features, when technically feasible. Small Woody Features layer is only the first constituent of the landscape features layer, but a significant one. Due to scale, resolution and methodological issues, the Commission considers that other landscape features layers (e.g. national, local) are complementary but not comparable. Member States are free to supplement the information with national information on landscape features.</p>
I.15/C.38	HU	<p>The following wording can be read in the document containing the description of the indicator (Context and impact indicators fiches, pp. 60., IMAPCT AND CONTEXT INDICATOR_FICHES_wk13622.en19_19_12_02.pdf): "A lack of nitrogen may cause degradation in soil fertility and erosion, while an excess may cause surface and groundwater (including drinking water) pollution and eutrophication". We basically agree with this, but consider it a problem that national averages (see Data Source) are not suitable for calculating N and P deficits or surpluses. A histogram of nutrient balances should be examined to detect them. In addition, a national assessment cannot reveal the impact of the aid on improving groundwater quality. There should be a separate histogram in both supported and non-supported (control) areas, and comparing them. In Hungary, we plan a detailed examination of the histograms, we would be happy to share the experiences with the other Member States.</p>	<p>Thank you for this information, we will check which forum would be the most appropriate for such presentation.</p>
I.16/C.38		<p>"It (i.e. I.16) consists on an index measuring the % of groundwater monitoring sites with nitrates' concentration (NO3-mg/l) over 50 mg/l for groundwater", i.e., the groundwater N pollution is to be determined from the monitored nitrate concentrations. (Context and impact indicators fiches, pp. 63: IMAPCT AND CONTEXT INDICATOR_FICHES_wk13622.en19_19_12_02.pdf). For this, they intend to coordinate data provision related to Water Framework Directive (WFD) and the Nitrates Directive. This is not a problem in Hungary, coordination is already in place. However, the lack of representativeness of monitoring wells is a common problem. Their spatial density is inadequate, but mainly due to the delay (leakage from the surface to well filtering can take up to decades), the measured nitrate data will not reflect the impact of CAP 2020+, but one of the previous nutrient use. To prove this statement, we will perform a He3/H3 groundwater dating test in the designated shallow wells of the national groundwater monitoring network. The Commission is aware of this, but they cannot recommend any other method that can be used at EU level. A model-based approach eliminates this problem, but it can only be applied at national level and should be the basis for impact assessments in national mid-term and ex-post reports. The two levels of evaluation are complementary and may be suitable for correcting false conclusions from global data. The verification and calibration of the model used in Hungary will be performed based on field shallow groundwater excavations and nitrate measurements at representative points.</p> <p>Comment on deleting a previous sub-indicator:</p> <p>- In its question 13 (pp. 39), the Commission replies to Member States' questions on indicator fiches (wk07390.en20.pdf) that France had based its indicator C.40 (2014-2020) on three sub-indicators in the previous planning period, the current draft intends to delete the indicator on the nitrate content of surface waters from these. We agree with the French position that it does not seem relevant to give priority to the indicator indicating the nitrate content of</p>	<p>Thanks for the information.</p>
C.39	HU	<p>HU supports all refinements that help to identify more precise causal linkage between the protection/enhancement of soil organic carbon and CAP payments. The Polish proposal of handling the wetlands and peatlands worth consideration. Furthermore, it looks worthwhile to work out a separate strategy for the protection (where it is good or average) and for the enhancement (where it is very little) of the soil organic carbon content. There is a great need for monitoring parcels where the effects of interventions could be monitored.</p>	<p>Interventions should target areas most in needs. This is why the Commission agrees with HU that monitoring the geographical location of interventions is requested, thus the request under "Data needs for monitoring and evaluation".</p>
C.40	HU	<p>It would be important to work out a method that gives opportunity for the farmers to introduce soil protection measures in all cases, even if it is needed in smaller spots inside a parcel. There is a great need for monitoring parcels where the effects of interventions could be monitored.</p>	<p>The Commission informs that the JRC work on farming practices is ongoing in order to collect results from scientific literature on the linkages between practices, objectives and indicators. The Commission is considering different ways to share the material with MS, with the first practices to be shared early in 2021. Furthermore, the Commission invites HU authorities to further explain what they consider "monitoring parcels", as it is not clear whether they refer to some sites where scientific experiments are carried on for carbon and erosion or not.</p>
O.29	ES	<p>El indicador output O.29. Número de agricultores formados/asesorados se define como el "número total de acciones de información, formación y asesoramiento (incluida la creación) realizadas para agricultores y no agricultores (excluidas las acciones de asesoramiento comunicadas en el O.2) en el ejercicio financiero en cuestión". Por tanto, aunque la unidad de medida (número de acciones de información, formación y asesoramiento) no se corresponde con el nombre del indicador (número de agricultores formados/asesorados) interpretamos que este indicador se mide en número de acciones.</p> <p>En ese caso, necesitaríamos saber que se entiende por "número de acción" para saber cómo computar este indicador. ¿Es una acción un curso completo, tanto si dura unas horas como varias semanas? ¿Se debe computar cada día del curso o hay otros criterios que se han de tener en cuenta para obtener el "número total de acciones"? ¿Una acción es el pago de un expediente completo de formación o de asesoramiento o de información independientemente de su duración? Se ha dado traslado de estas cuestiones también al Grupo de Expertos en Evaluación y Seguimiento</p>	<p>The title of indicator O.29 was changed by the Presidency to reflect the actual management of training support paid per operation (originally it was "O.29: Number of farmers trained/given advice" and then the Presidency proposed "O.29 Number of training and advice operations or units supported by EAFRD"). The unit of measurement is operations and not farmers. Answering to a question raised by MS (see the Note circulated in July), the Commission clarified that although information actions might generate different outputs (e.g. training, websites, newsletter, etc.) behind these outputs there is always an operation to be paid and cleared. In addition, what is an action depends on how you design your interventions and what you pay for. If you pay for the entire programme, the output is the programme. If you pay individual actions separately, then you count them as distinct outputs.</p>
R.1, R.24	ES	<p>En los indicadores de resultado R.1 y R.24 se observa que el nombre del indicador no se corresponde con la unidad de medida de dichos indicadores.</p> <p>Al igual que sucede con el indicador O.29, interpretamos que estos indicadores se miden en las unidades que figuran en el apartado "unidad de medida" de las fichas de los indicadores, a pesar de que no coincida con el nombre de los indicadores. ¿Es esta interpretación correcta?</p>	<p>For both indicators, the original proposal of the Commission was modified by the Presidency (R.1 Enhancing performance through knowledge and innovation: Number of persons benefiting from support for advice, training, knowledge exchange, or participating in EIP operational groups or other cooperation groups/actions; R.24 Environmental/climate performance through knowledge: Number of persons benefiting from advice, training, knowledge exchange supported by the CAP related to environmental-climate performance). Therefore, the unit of measurement was modified accordingly (and indeed it corresponds to "nr. of persons" for both indicators)</p>

R.35	ES	<p>El indicador de resultado R.35 Promoción de la inclusión social, no incluye entre sus intervenciones las relativas al artículo 72 intercambio de conocimientos e información.</p> <p>Si se da la situación de que, por ejemplo, se imparten cursos destinados a mujeres rurales, desempleados o cualquier otro colectivo englobado en estos grupos que necesitan apoyo específico ¿se podrían computar esas actividades de intercambio de conocimientos e información en este indicador de índole social R.35?</p>	<p>MS can link the contribution of the knowledge exchange (Art. 72) to R.35 depending on the intervention logic described by the MS on the specific intervention. It requires being able to determine the number of participants to the training course and add it to the numerator of R.35.</p>
R.38a	ES	<p>El indicador de resultado R.38a no recoge el artículo 72 dentro de los tipos de intervenciones que pueden estar relacionadas "R.38a. Informar a los ciudadanos de la UE sobre los productos agroalimentarios: Número de días con acciones de promoción e información en la UE financiadas con tipos de intervenciones sectoriales". Sin embargo, supongamos que se celebran jornadas o campañas de promoción de determinados productos a través del FEADER, ¿se podrían computar esas actividades de intercambio de conocimientos e información, artículo 72, en este indicador R 38a?</p>	<p>To the Commission knowledge these campaigns are financed under Article 71 (cooperation) and the Commission added this intervention to the fiche. However, the indicator R.38a was deleted in the last proposal of the Presidency.</p>
General question/comment (Art. 67 and Art 66)	ES	<p>At least 30% of the total EAFRD contribution to the CAP Strategic Plan as set out in Annex IX shall be reserved for interventions addressing the specific environmental- and climate-related objectives set out in points (d), (e) and (f) of Article 6(1) of this Regulation.</p> <p>If a Member State would address that the payments for Area-specific disadvantages (art 67) contribute with 30% of EAFRD to specific environmental- and climate-related objectives, would it be compulsory to connect this interventions with a environmental and climate-related objectives?</p> <p>According to the indicators fiches, the intervention of the art 67, are just linked to RI 4 and RI 7 (Cover Note). It would be necessary to link the payments of the articule 67 with the adequate result indicator (i.e. R28, R20...)? Is it correct?</p> <p>This question could also apply to payments in areas with natural limitations constraints (art 66 ANCs).</p>	<p>a) Yes, if ES authorities would include payments to Area-specific disadvantages under the 30% of EAFRD contribution reserved to the specific environmental- and climate-related objectives, then it should connect these interventions with environmental and climate-related objectives;</p> <p>b) No, as indicated in the respective indicator fiches, intervention under Art. 67 are linked to R.4 and R.7;</p> <p>c) No, as indicated in the respective indicator fiches, intervention under Art. 66 are linked to R.4 and R.7.</p>
R.15, R.16a	ES	<p>Some interventions linked to renewable energy, including biomass-based energy, would count for indicators R15 and R16.a, so there is an overlap between both indicators. Would it be possible to compute these actions for both indicators? Is this interpretation correct?</p>	<p>Yes, your interpretation is correct. Interventions linked to renewable energy (e.g. investment in a gas engine from organic waste) would account for R.15 (in terms of Megawat produced) and for R.16a (as a farm receiving support).</p>