## +CMEF COMMENTS OF MEMBER STATES AND COMMISSION REPLY

## COMMENTS RELATED TO THE MONITORING TABLES

TYPE OF DOCUMENT	MS COMMENTS	COMMISSION REPLY		
Result indicators	BE, ES, SE What about the result indicators? Are they any specific result indicator tables for HC and EERP?  If no specific HC result tables are foreseen, why the table G.2 mentions the relevant Result tables in the last column?	No. The HC and EERP measures will be monitored and reported in the current Result Main and Convergence tables without any distinctions.  It shows clearly that the HC and EERP measures should also be included in the regular R tables.		
Output indicators - general	AT, BE, DE Is it necessary to distinguish where the HC and EERP measures have been implemented (in the convergence or non convergence areas)?	For the RDP which are concerned (only RDP with both non convergence and convergence areas):  No distinction is foreseen in the new HC and EERP specific output tables.  But, as the HC and EERP measures are also reported under the regular Output Main and Output Convergence, this distinction is done at this stage.		
Output indicators - general	SE Please confirm that the new HC tables are broken down by type of operation within a measure <u>and</u> should be filled in with activities financed only from <i>the extra money from the new modulation and EERP</i> .	Yes, we confirm		
Output indicators - general	BE, DE What happens if the HC and EERP measures are not yet implemented in 2009	This will be assessed with the geographical units during the preparation of the APR 2009 (to be submitted by June 2010). But if there is really no implementation, the HC and EERP tables could be filled in with NP and NI.		

Output indicators - general	It is possible to use both existing funds and new funds for new priorities and we have doubts about having separate detailed monitoring indicators for funds coming from the health check (HC) and the recovery package (EERP). We consider that a better alternative would be either to have HC and EERP shown together with other parts of the RDP (no separate tables) or connected to priority (irrespective of funding).	As requested by the art. 62 (1) of the Regulation 1974/2006, monitoring of the Output indicators for Health Check (HC) and European Economic Recovery package (EERP) has to be done by 'type of operation'. Monitoring HC by type of priority is therefore not enough.  The initial EAFRD measures should not be monitored at 'type of operation' level. That is why a separate set of tables is designed for the HC. If we monitor HC and the initial EAFRD together, it would oblige us to modify the whole current set of tables to distinguish the different type of operations. The Commission services, supported by several MS, consider that this solution would impact the current monitoring systems dealing with the initial EAFRD budget. This option would bring more complexity.
Output indicators - general	BE When the applications will be approved, it is not always know what the fund (regular EAFRD or HC) is because some measures could be supported by these both funds.	For the regular Output tables (Main and Convergence), there is no problem because no distinction is necessary between the two budgets.  For the HC and EERP tables, you should follow the Guidelines which says: 'Reporting should be done as data becomes available'. In that case, the data becomes available later on when the used budget is known.  Please count also these applications in the HC and EERP tables.
Output indicators - general	<b>BE</b> Top-ups have to be reported in the regular tables. What happens for the top-ups of the HC and EERP measures?	For simplification, we suggest to introduce the top-ups (including HC top-ups) only in the regular tables.
Output indicators - general	Please make sure that all the type of operations offered in the HC and EERP output tables are eligible (i.e. setting up of NATURA 2000 land management plans seems not eligible in 214)	The tables have been revised accordingly. However, in some cases, type of operations might have been interpreted with some flexibility. Therefore, we have chosen not to delete some possible links. For instance, 'creation of natural banks' clearly refers to investment measure but could also be considered for 214 if the measure is <i>maintenance</i> oriented.
Output indicators - general	<b>DE</b> Please confirm that EERP is also concerned by this set of tables	This set of tables covers both HC and EERP. Type of

	and that no additional set of tables for EERP will be required.	operations described in the annex of the council regulation n°473/2009 are taken into account (table O.321(HC)). If other measures are used for EERP, it will be shown in the G tables but it has also to be reported under 'others'. Finally, additional indicators could be defined and reported under O.A(HC).	
Output indicators - general	AT, DE, ES  We understand that the O.xxx tables have been drafted according the annexes of Council regulations n° 74/2009 and 473/2009, and therefore not all the measures have an O.xxx table. But these annexes are not exhaustive and other measures could be implemented. Could you adapt the O.xxx tables for these specific cases:  • Measures 215 will be used in some programmes • Innovation priority is only mentioned under 124 • 114: only climate change is mentioned but the other priorities could also be relevant here • 125: other priorities like renewable energy could also be relevant here  Based on this example, ES suggests to mention all the priorities in the O.xxx tables.  DE  Under the current draft version, the row 'others' is not related to the priorities. We will miss information because some measures will not be related to the priorities.	Based on a screening of the draft modified HC programmes, we identified the measures used by the RDP. Therefore, the relevant measures have been added (215, 322, 313, 115).  The O. tables have been also improved to cover all the priorities.  The improved version of the O. tables integrates this comment.	
Output indicators - general	<b>DE</b> Will the transmission through SFC2007 be possible via Web services?	Web forms and web services are foreseen.	
Output indicators— measure tables	<b>BE</b> What happens if a type of operation is mentioned under several priorities for a given indicators. i.e. organic farming in O.214(HC) is mentioned under water management, biodiversity	It is necessary to choose the predominant priority and the predominant type of operation. No double counting. The definition of the priority for each HC measure was necessary in the context of the NSP.	
Output indicators— existing measures	BE What should be done with the existing measure (i.e. AEM)? What should be filled in O.214(HC), if a 5 year contract is paid by the regular EAFRD in 2008/2009 and by the HC and EERP in 2010/2012?	For the regular Output tables (Main and Convergence), there is no change. You should continue to report this measure from 2008 to 2012 as any other measures. The HC and EERP measures are reported in the regular tables without any	

		distinctions. The expenditures are reported cumulatively and the number of holdings/areas are reported without double counting (unique value).  For the HC and EERP Output tables, please start reporting these measures by 2010. (i.e. only the expenditures done by HC and EERP in 2010/2012 are reported).
	<b>DE</b> Which measures should be included in the HC and EERP output tables? What happens to the existing/new measures which are supported by HC and EERP since 2009/2010? What happens to the new measures non-supported by the HC and EERP budget introduced in the same RDP modification?	Both existing and new measures supported by HC and EERP should be filled in the HC and EERP tables. For the existing measures, only the part supported by HC and EERP should be considered.  Meanwhile, if some new measures non-supported by HC and EERP have been introduced in the RDP, these measures are not considered in the HC and EERP tables.
Output indicators – G2(HC)	ES  We understand that the O.xxx tables have been drafted based on the annexes of Council regulations n° 74/2009 and 473/2009, and therefore not all the measures have an O.xxx table. But these annexes are not exhaustive and other measures could be implemented. We suggest adapting G2(HC) to mention the complete set of RD measures.	The table G2(HC) has been adapted accordingly. In order to be consistent the tables G3(HC) and G5(HC) have also been completed to cover all the RD measures.
Output indicators – G5(HC)	SE Potential difficulty to report the financial data from the financial declaration in the Monitoring fiches for output (ex. G5.HC), where co-financing rate is different for the measures in the original program and for the same measure under HC. How can we distinguish the different rates and how are we supposed to report respectively in the financial report and the monitoring (e.g. G.5 HC) as there are no new budget codes/measures created for HC in the financial report.	Expenditures reported in the monitoring tables should be the expenditures (payments) made under Regulation (EC) No. 1698/2006 by MS and declared to the Commission. The purpose is indeed to have expenditures as much consistent as possible with the financial data.  However, monitoring requires more detailed information compared to the financial reports. This is already the case for the regular tables. Therefore, the MS should carry out the relevant treatment to break down the financial data to feed the monitoring tables.
Output indicators – O.114(HC)	ES ES suggests modifying the table O.114(HC) following the changes	O.114(HC) is adapted accordingly.

	introduced by the Council Regulation n°74/2009. It concerns the					
	distinction between the applications over or below 15.000€					
Output indicators –O.214(HC)	According the Guidelines, double counting have to be avoided. What happens if a farmer A has finalised a AEM scheme for his plot A (1ha) in 2011 (This scheme was supported by regular EAFRD) and if this same farmer A signs a new contract in 2012 for his plot A (1ha) supported by HC and EERP budget	is no change other measur the regular to	For the regular Output tables (Main and Convergence), there is no change. You should report these two schemes as any other measure. The HC and EERP measures are reported in the regular tables without any distinctions.  The result is for regular table:			
				Dhysical	1	
			Nbr of holdings	Physical Area	Expenditures	
		2007	1	/ 11 0 4		
		2008	1	,	2000	
		2009		,		
		2010		,		
		2011	1	,		
		2012	1	,	6000	
		2013		-	+	
		2014		1	+	
		measures are in the HC an	0 1 1	dently in the re o double count o table: Physical Area	Expenditures 0 0 0 1000 2000	
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