

1. **O.1. Number of EIP operational projects** – This indicator is planned to be used as an output indicator for *Cooperation*, where also a preparatory support for EIPs is envisaged, therefore, as it has been proposed within indicator O.27 relating to local development strategies, also in this case, the definition needs to be broadened.
2. Indicator O.28. **Number of other supported cooperation groups projects (excluding EIP reported under O.1)** - it can be planned to be used as an output indicator for *Cooperation*, where also a preparatory support for EIPs is envisaged, therefore, as it has been proposed within indicator O.27 relating to local development strategies, also in this case, the definition needs to be broadened.
3. As a result of introduction of a new scope of support under article 69(2)(aa) – development of small farms, due to the lack of an appropriate result indicator, we ask for adding an adequate one. Alternatively, it can be considered a change in the definition of indicator R.9. in a way which would enable the inclusion of the support for small farms in it, for instance as follows:
R.9 Farm modernisation: Share of farmers receiving **investment** support to restructure and modernise, including to improve resource efficiency.
As far, as output indicators are considered, we would like to ask for a confirmation, whether the current sounding of the definition of indicator O.23, enables to cover also farms benefitting from the small farms support scheme. If it doesn't, we ask for introducing a new adequate output indicator.
4. Currently there is no appropriate result indicator for a set of interventions concerned within the future SP. For instance, investments in agricultural retail trade, where a farmer is a beneficiary, but we cannot calculate him neither to R.10 (as art.68 is not covered by this indicator), nor to R.32, as it can be hardly treated as a bio-economy business. Moreover, in our opinion the current set of indicators does not cover start-ups for rural businesses (art.69(2)(b)). Widening the definition of indicator R.32. would enable to include all of these interventions within one indicator devoted to development of rural economy

R.32. Developing the rural bio-economy: Number of **rural businesses including** bio-economy businesses developed with support
5. Indicator R.15. **Green energy from agriculture and forestry: Supported investments in renewable energy production capacity, including bio-based (Megawatt)** – in our opinion, this indicator is very difficult to predict ex-ante, as long as it covers the calculation of Megawatt of yearly capacity of renewable energy technology. In our opinion, the only indicator which is possible to predict before the implementation of CAP Plan is the number of installations. Their capacity could be collected but after the completion of related operations (ex-post).
6. **R.16 Enhancing energy efficiency: Energy savings by means of supported actions (T.o.e.)** – This indicator is extremely difficult to predict ex-ante and therefore be treated as a performance review indicator. Moreover, when a more complex investment is included, in which only a part of the operation is connected with renewable energy production (for instance: installation of solar panels on a livestock building together with its thermomodernisation), the net effect of the panels would be hard to capture, even after the operation's completion. We therefore insist on erasure of this indicator from Annex I.