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WORKING PAPER

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From: To:	General Secretariat of the Council Working Party on Horizontal Agricultural Questions (CAP Reform)
N° Cion doc.:	9645/18 + COR 1 + ADD 1
Subject:	Proposal for a Regulation on CAP Strategic Plans - Comments from the Latvian delegation on updated Commission fiches on result and output indicators

Delegations will find attached comments from the Latvian delegation on updated Commission fiches on result and output indicators (WK 9352/2019 + WK 9353/2019 REV1).

Latvia's comments concerning the Output and Result indicators

(Updated fiches to the Working Party on Horizontal Agricultural Questions (CAP reform) on 4 September 2019, fiches distributed in documents WK 9352/2019 INIT and WK 9353/2019 INIT)

20.09.2019.

In the recently distributed indicator fishes, in many cases, the names of the OI and RI indicators significantly differ from those in amendments, made by the RO PRES to Annex 1 of the Regulation. Therefore, indicator name does not match the information mentioned in the description of the methodology of these indicators, especially position "Unit of measurement". In Annex 1 of the Regulation proposal of RO PRES, the indicators O.6 and O.7 have been excluded, but the versions of new fishes have been prepared for these indicators. As well as there are no fishes prepared for the new indicators in above mentioned Annex 1: O.35a; O.35b, R.9a; R.17a; R22.a; R.23.a; R31a; R.38 a.

As regards the Outcome indicators (O.1; O.2; O.8; O.18; O.19; O.20; O.21; O.22; O.23; O27; O.28) in fishes, the methodology of reporting data, prescribes a partial reporting of projects, beneficiaries etc. if only a partial payment was made in the Financial Year concerned (e.g. if the LEADER group's strategy is paid for 25% of the total available funding, the corresponding outcome indicator is 0,25 supported strategies), which complicates with the accounting and reporting mechanism, creates additional administrative burden, and creates an erroneous perception of the actual situation (e.g. 35 of LEADER strategies will be paid annually, but the figure will show 4,8).

Moreover, such partial reporting creates an incomprehensible situation (according to the reporting system of "Non-paper on the content of the Annual performance report (APR)") of financing recoveries for discontinued projects, which has been partially paid for to beneficiaries and the appropriate outcome indicators have been reported proportionally (e.g. number of projects). In such cases, Financing from recoveries of previous years will be reported in appropriate tables of APR, but how partially reported outcome indicator will be shown?

Indicator name	Comments
O.2: Number of advisors setting up or participating in EIP Operational Groups (OGs)	It is not clear what does exactly mean "advice activities" – should we count by sets of advice for farmer, days etc.?
O.3. Number of CAP support beneficiaries	According to the methodology it is not clearly identified whether non-agricultural beneficiaries, foresters, EIP groups must be included in number of beneficiaries.
O.15: Number of ha with support for organic farming	Should agricultural land areas in the period of conversion to organic farming and organic farming maintenance areas be counted together?
O.29: Number of farmers trained/given advice	It is not clear what does exactly mean "Information, training and advice actions" - hours, lectures, contracts with specialists, set of training activities by subject etc.?
R.2.: Linking advice and knowledge systems: number of advisors integrated within AKIS (compared to total number of farmers)	What is meant by one full day of support provided to advisors - 8 hours, 8 academic hours (45 min) and how should it be accounted if different farmers have been consulted in one day (e.g. first -3 h; second - 3 h and third - 2 h)?

R.18: Improving soils: Share of agricultural land under management commitments beneficial for soil management **R.19: Improving air quality**: Share of agricultural land under commitments to reduce ammonia emission **R.20: Protecting water quality:** Share of agricultural land under management commitments for water quality **R.21: Sustainable nutrient management:** Share of agricultural land under commitments related to improved nutrient management	R.18 up to R.21. LV foresee the problem clearly identify which intervention will give impact on these indicators, for instance the organic farming contributes to the achievement of several objectives, therefore, should the total area of organic farming be included in each of the indicators R.18 and R.20, or only part of it?
R.31: Growth and jobs in rural areas: New jobs in supported projects	In general, jobs are created after implementation of projects but the methodology requires accounting of the number of new jobs based on application forms/ business plans after the first payment. Will that indicator be updated afterwards?
R.27 Preserving habitats and species: Share of agricultural land under management commitments supporting biodiversity conservation or restoration	In the case of LV agri-environmental interventions for areas will be intended outside Utilised Agricultural Area (UAA) but nevertheless agricultural activities (grazing) will be carried out, for instance, habitat – Fennoscandian wooded meadows, or Fennoscandian wooded pastures, or Juniperus communis formations on heaths or calcareous grasslands. Will it be correct to attribute the use of Total Utilised Agricultural Area to Denominator?