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WORKING PAPER

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	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 Polish delegation on updated Commission fiches on result and output indicators

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

Part 4 Indicators

As a result of work on identifying the needs for specific objectives of the future CAP strategic plan, some questions and doubts arose regarding, among others following issues:

1. Please confirm whether:

- future beneficiaries being SME entities operating in the processing of agricultural products,
- support for agricultural entrepreneurship which not related to job creation,

can be counted by a result indicator **R.32 Developing the rural bioeconomy:** *Number of bio-economy businesses developed with support?* (description from document WK 9352/2019 INIT of September 4, 2019).

2. Result indicator **R.9 Farm modernization:** Share of farmers receiving investment support to restructure and modernise, including to improve resource efficiency - due to the method of determining the objective referred to in Article 6 para. 1 letter b of the draft EU regulation on the national strategic plan (enhance market orientation and increase competitiveness, including greater focus on research, technology and digitalisation), enables a broad approach to strengthen market orientation and increase competitiveness. We propose that the result indicator **R.9** also reflect such a broad approach. Therefore, we propose the following wording of **R.9 Farm modernization indicator:** Share of farmers receiving investment support to restructure and modernise, including to improve resource efficiency.

3. As regards the **R.36 indicator (Limiting antibiotic use)**, in the denominator there is number of animals which from year to year may significantly differ. This may cause the problem in programming and afterwards achieving the goals. The same situation will occure with R.13 indicator (**Reducing emissions in the livestock sector)**, where the change in the denominator (number of animals) in subsequent years will result in not achieving the value of result indicator although the planned product will be realised.

4. Could we have an explanation why the reporting of the partial outputs was abandonned (in case the advance payment was done) as regards the I pillar interventions' output indicator O.4, O.6, O.9, O.10. In our opinion such approach is not consistent with the one for the II pillars' indicators (i.e. O.13 and O.14) where the partial reporting will be done in case of advance payments. We understand that, as a general rule, the advance payments and the final payment for I pillar should be done in the same financial year but it may happen differently.

5. We still have doubts as regards the taking into account the whole areas (despite that only the advance payment was done) in the result indicators. In our opinion the reporting should be done in the same way as the product indicators – partially for the advance payment, because the area is not „marked" so in the result indicator will be doubled.