



Council of the European Union
General Secretariat

**Interinstitutional files:
2018/0216(COD)**

Brussels, 01 October 2019

WK 10242/2019 ADD 4

LIMITE

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WORKING PAPER

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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 Maltese delegation on updated Commission fiches on result and output indicators

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

Malta's Written Comments on the draft Regulation for CAP Strategic Plans further to the Working Party on Horizontal Agricultural Questions (CAP Reform) held on 11 and 12 September 2019

Malta's comments further to the latest discussion that took place at the Working Party of 11 and 12 September are as follows:

Indicators (Art. 7 of the CAP Strategic Plans Regulation)

MT position:

-In relation to R15 and O.13 whereby reference is being made to payments to be made in relation to the number of hectares (ha) covered by envi/climate commitments that go beyond the mandatory requirements – this is considered to be an issue for Malta in the case of landless farmers who already apply such measures. In this regard we would require more clarifications on how this will apply in this specific case.

-In relation to R16 : '*enhance energy efficiency*' : *energy savings in agriculture*, in Malta's case it is more about energy production rather than saving so we would require clarifications also in this regard on how this can be applied.

-In relation to R.23, we would like to confirm that, in view of the fact that the methodology indicates that the farm counts as 1 as from the first payment, partial completion will still be reported as 1 operation completed (even if completion will materialise in subsequent years).

-In relation to R26: 'share of forest land under management commitments..' in Malta's case is rather 'afforested area'. We would like to clarify whether that would be applicable in this case.

-In relation to R33 in relation to Smart Villages Strategy: we would require clarifications on whether this needs to be applied.

In the case of O.18 – O.22; we maintain that the methodology being proposed (reported per average unit amount and reporting partial output) will introduce significant complexity.