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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 - New delivery model

Following the discussion held in the Working Party on Horizontal Agricultural Questions (CAP Reform) on 13 September 2019, delegations will find attached comments from the Slovenian delegation on the new delivery model and indicators.



Slovenian comments on new delivery model and indicators

WORKING PARTY ON HORIZONTAL AGRICULTURAL QUESTIONS - CAP REFORM - 13 September 2019

Article	Content	Question and comments
Part 3: New delivery model - core articles (Art. 88, 89, 97, 99, 100, 115, 121, 121a)		
		<u>Justifications for deviations:</u> It is necessary to clearly define when it will be compulsory to give justifications and when not. We suggest that the legislation clearly states when justifications are needed regarding the deviation and what the consequences are. <u>Milestones:</u> We do not agree with the annual assessment of milestones. We suggest that only mid-term and end-of-period assessment be carried out (as is the case in the current programming period). The Commission can monitor the milestones each year, but only assess them once during implementation and at the end of the programming period. <u>Unit amount</u> The unit amount does not show performance of implementing the CAP strategic plan. We propose examination of the use of the maximum amount per unit. We ask the Commission for clarification on the discrepancy between CAP strategic plan, which covers the years until 2027 and the reporting in the APR, which is also for 2028 and 2029.
Part 4: Indicators		
7	Indicators	We support the amendment in Article 7.
	Output and result indicators fiches	The questions will be prepared later and will be presented by our experts at the GREXE meeting on 3 October.