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General Secretariat

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**Brussels, 09 April 2019**

**WK 10820/2018 ADD 6**

**LIMITE**

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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.:	9634/18 + COR 1 + ADD 1
Subject:	Proposal for a Regulation on Financing, management and monitoring of the CAP - Comments received from the Finnish delegation on the Commission's replies to delegations' comments (Title IV, Chapters II and IV)

Delegations will find attached the comments received from the Finnish delegation on the Commission's replies to written comments submitted by delegations on the Title IV, Chapters II and IV of the abovementioned proposal (see WK 10820/2018 ADD 5).

## Comments and questions of Finland to the Commission working document on IACS QA.

The Commission's non-papers and working document are a valuable contribution to increasing the understanding of the future IACS. We would like to submit the following questions to increase understanding even more.

### Commission working document WK 10820/2018 ADD 5 (Commission's replies to IACS comments)

Based on the answers given by the Commission, we have understood that we have to make information publicly available at national level and at agricultural parcel level about the interventions we have in our CAP plan (HZR 65(3) Article) and include to our LPIS indicator information referred to in Article 7 of SPR (HZR 66(2)(d) Article).

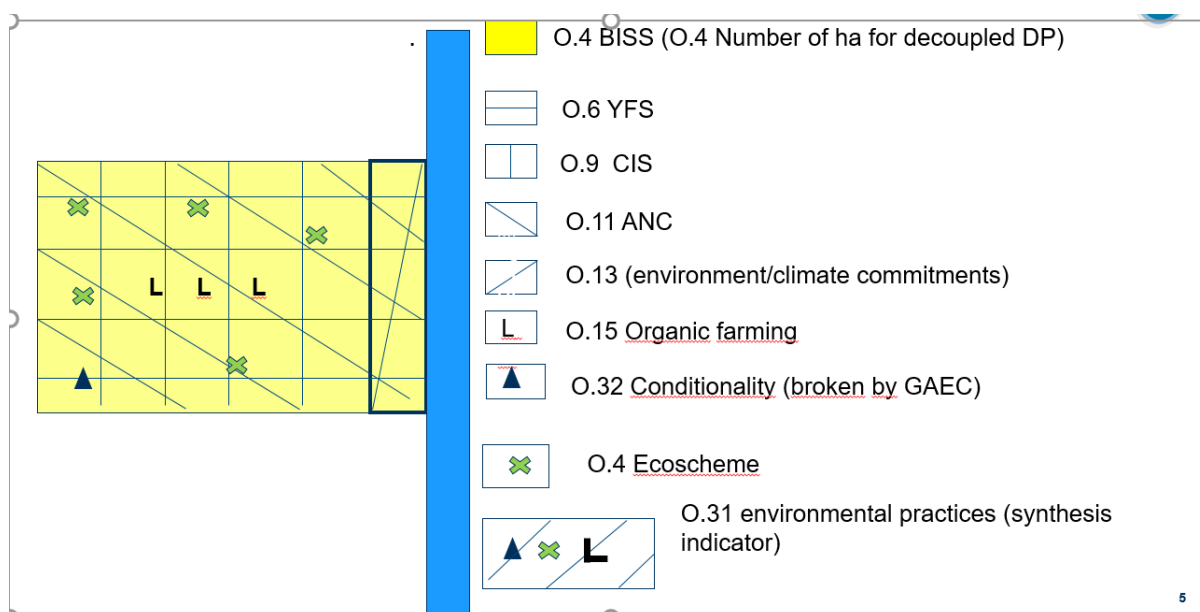
Based on that we assume that our LPIS should look something like the following and that it should be made publicly available at national level. Is that correct interpretation?

In the example there are two agricultural parcels (bigger one and smaller one). The smaller one is situated beside a river.

In the bigger parcel protein crop is cultivated and based on that parcel is paid BISS, YFS, CIS, ANC, support for organic farming and ecoscheme support during the FY (or partly paid as advances). There is a small landscape feature also in the corner of the bigger parcel.

The smaller parcel is entirely a riparian zone where grass is cultivated and based on that parcel is paid BISS, YFS, ANC, and support based on environment/climate commitment during the FY (or partly paid as advances).

In addition to that an aggregate (O.31) has to be counted. In this case, it covers both parcels.



### Questions about separate and common indicators

O.4 Number of ha for decoupled DP covers BISS+CIS+YF+Eco-scheme+redistributive payment (no double counting). Thus no separate "flags" are needed for those payment, but those can all be under one "flag"?

For O.6 Number of ha subject to enhanced income support for young farmers we need a separate "flag" even if it is also included into O.4?

Eco-scheme is under O.4, but for O.31 (synthesis indicator) we need a separate "flag" for eco-scheme agricultural parcels?

For O.32 Number of ha subject to conditionality (broken down by GAEP practice) and for I.20 Enhanced provision of ecosystem services: share of UAA covered with landscape features we need a separate “flag”? Does this area cover the whole parcel or only the area under the landscape feature?

#### Animal payments

Article 7 of SPR covers also animal payments, like O.10 Number of heads benefitting from coupled support. We hope that there is a derogation that stipulates that those places where animals are kept are not included into LPIS. That would create very much red tape and make it too easy for radical animal right activists to plan their actions.