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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
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Subject:	Regulation establishing the conditions for the implementation of Union support under the CAP - Comments from Croatia on block I

2 October 09.33/from e-consilium

Dear colleagues,

hereby Croatia is sending comments on Block 1 (Articles 1, 2, 5) of the CAP post 2027 regulation.

In relation to **Article 2**, which refers to national recommendations under the CAP and steering, we believe that more detailed information is needed and we are seeking answers to the following questions:

- Are these recommendations binding and if so, how does this affect the subsidiarity of Member States and their decision-making autonomy? We consider that Member States should be able to choose which interventions they will implement in accordance with their specific circumstances. On what analyses and what data are the recommendations based, namely, it is not clear from the provision of the article who draws up the analyses, the EC or the Member States.
- The provision of paragraph 1, subparagraph 2, stipulates that the EC may update national recommendations, however, it is not clear what the dynamics of possible updates to the recommendations are and how much time Member States have to make the necessary changes to the NRP and reprogram the interventions to which the recommendations relate in accordance with the updated recommendations.
- Given that the new programming period starts in 2028, we would like to know when the EC will draw up and submit to each Member State the recommendations that should serve as the basis/guidelines for drawing up the NRP. When will the recommendations be available?
- How will the demarcation between the competences of different sectors be ensured to achieve the established goals and solve the challenges arising from the recommendations? We are of opinion that there is a possibility of overlap between the competences of individual sectors in relation to solving the key challenges that the Commission identified in the recommendations.

In addition to **Article 5 - Types of support**

- It is necessary to explain the reasons why funds and eligibility conditions for investment type support (i) support for investments for farmers and forest holders are not considered as a part of this regulation. We are of opinion that this type of support should be financed through the CAP support.
- It is also necessary to clarify what is the difference between the type of support (l) LEADER and (n) initiatives for territorial and local cooperation, considering the basic role of LEADER in the current programming period.

Kind regards,
Croatian Team