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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Horizontal Agricultural Questions (Post-2027 CAP)
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Subject:	Regulation establishing the conditions for the implementation of Union support under the CAP - Comments from Bulgaria on block V

CAP post-2027, written comments from Bulgaria on block 5, Articles 18 to 21

We would like to make the following initial comments and requests for clarifications:

The Agricultural Knowledge and Innovation System (AKIS) is essential for achieving the goals of the Common Agricultural Policy by fostering innovation, knowledge exchange, and cooperation among farmers, researchers, advisors, and rural actors. Article 19 provides the foundation for supporting these activities through EIP-AGRI operational groups, training, and advisory services that bridge science and practice.

Despite its strategic importance, AKIS currently lacks a ring-fenced budget within the National and Regional Partnership Plans (NRPs). This absence of dedicated financial support jeopardizes the continuity of advisory services, innovation networks, and the implementation of EIP-AGRI projects. Without secured resources, Member States risk losing the capacity to translate research into practical solutions and to sustain collaboration between key actors in agriculture and rural development.

We call for the protection of a dedicated budget for AKIS measures within the NRPs to ensure consistent investment in knowledge sharing, advisory capacity, and innovation. Securing this funding is vital to maintain the momentum of EIP-AGRI, strengthen the AKIS framework, and deliver tangible impact for farmers, foresters, and rural communities.

The EC informed that all data related to funding provided by the EU budget and related to all EU funds need to be published for transparency reasons by the MS on a single specific data portal by specific deadlines and following specific conditions. Having this in mind, please clarify why the authority in charge of collecting CAP data should be included in the CAP regulation which concerns mainly the CAP interventions eligibility rules and considering also that the requirements for data collection and publishing, including for transparency and performance monitoring reasons, are indicated in the proposed NRPP regulation (Art. 63 and Art. 64 of the NRPP regulation)? Does this mean also that there will a separate authority in charge of data governance for the policy areas included in the NRPP regulation, in addition to the authority in charge of data governance under the CAP?

Considering the proposed obligation for MS to cover and identify possible synergies with other EU and national interoperability initiatives, please indicate what is the relation of these provisions with Directive 2007/2/EC on the infrastructure for spatial information in the European Community (which is not under the authority of the Ministry of agriculture).

In general, we think this proposal and establishing of such authority need to be put under serious attention considering the effects on other administrative authorities, legislation, the administrative and financial burden for MS, the expert capacity and electronic systems that need to be provided or developed, especially in the short timeframe to 2029, which are all prerequisites for the proper functioning of such authority on data governance under CAP. Considering this, we cannot support also inclusion of a specific obligation for submission of an annual report to the EC and the specific deadline for this by end of 2029.