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CONTRIBUTION

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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 Lithuania on block V

**Comments and questions from the Lithuanian delegation as regards the Proposal for a
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the conditions for the implementation of the
Union support to the Common Agriculture Policy for the period from 2028 to 2034
ST 11733 2025 INIT**

Block 5

Commission proposal	LT comments	LT questions
Proposal for a		
REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL		
establishing the conditions for the implementation of the Union support to the Common Agriculture Policy for the period from 2028 to 2034		

Commission proposal	LT comments	LT questions
<p><i>Article 18</i> LEADER</p>	<p>LEADER is one of the key instruments supporting the economic and social vitality of rural areas in Lithuania.</p> <p>Without a ring-fenced budget, rural areas would be dependent solely on agriculture and lack basic services, which would further worsen the challenge of generational renewal.</p>	<p>We ask the Commission to ensure a minimum level of funding is provided (e.g. no less than 5%).</p>
<p>1. Member States shall provide support for LEADER to prepare and implement LEADER local development strategies under the conditions laid down in Article 76 of Regulation (EU) [...] [NRP] and as further specified in their NRP Plans.</p>	<p>Article 18 is dedicated to the LEADER, but it does not mention Community-Led Local Development (CLLD).</p> <p>In previous periods, CLLD was regarded as equivalent to the LEADER approach.</p>	<p>Does the Commission consider LEADER and CLLD to be implemented separately in the new programming period?</p>
<p>2. Member States shall support LEADER at least in rural areas with specific disadvantages defined by the Member States in the NPR Plans.</p>	<p>-</p>	<p>How does the Commission understand the concept of “rural areas with specific disadvantages” under Article 18 part (2)?</p> <p>Will guidelines be developed to define these areas?</p>

Commission proposal	LT comments	LT questions
3. Member States shall provide support through LEADER for projects implemented by local action groups involving startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation.	This clause significantly narrows the list of LEADER activities, allowing only those activities related to agriculture.	We ask the Commission not to restrict the activities implemented by Leader?
4. Support provided from LEADER shall be focused on rural development fields with added value for farmers and forest holders, such as social, environmental, digital and economic transformation of rural areas, improvement of well-being of rural citizens, strengthening social capital.	Both Article 18 (4) and Article 4 (3) (c) of the NRP significantly narrow the range of potential LEADER beneficiaries — effectively limiting them to farmers.	To ensure that LEADER support reaches wider rural communities, we ask the Commission to expand the list of eligible applicants, allowing both natural and legal persons who reside or are established in rural areas?
<i>Article 19</i> <i>Support for knowledge sharing and innovation in agriculture, forestry and rural areas</i>		
1. Member States shall provide support for knowledge sharing and innovation in agriculture, forestry and rural areas under the conditions laid down in this Article. Member States shall provide support:	It is proposed to explicitly include knowledge dissemination and demonstration activities	Are knowledge dissemination and demonstration activities considered eligible for support under this article (eligible expenditure)?

Commission proposal	LT comments	LT questions
(a) to prepare and implement the projects of the EIP-AGRI operational groups as well as actions to ensure broader uptake of projects' results;		
(b) for actions to promote innovation, training and advice, skills development, advisory services and other forms of knowledge sharing and dissemination of information.	It is proposed to explicitly include knowledge dissemination and demonstration activities	Are knowledge dissemination and demonstration activities considered eligible for support under this article?
Support for advisory services shall only be granted for those advisory services that comply with Article 20(3).		
<p>2. The aim of EIP-AGRI shall be to accelerate development and use of innovations by improving the exchange of knowledge and fostering synergies between policies, actors and instruments in agriculture, forestry and rural areas. Results from its work shall be disseminated and multiplied through the AKIS.</p> <p>The EIP-AGRI shall:</p>	<p>1. These requirements for dissemination of results do not coincide with those provided in part 2 of paragraph 3 of this article:</p> <p>“Member States shall ensure that the key results of the projects referred to in this paragraph are disseminated through practice-oriented channels, including the national and Union CAP networks.</p> <p>The disseminated information shall include the objectives of the projects, participating partners, key thematic areas addressed, geographical location of the project, total budget, and the final</p>	

Commission proposal	LT comments	LT questions
	<p>outcome of the project, with focus on the practical innovative solutions developed.”</p> <p>2. It is proposed that the dissemination of results through AKIS be mandatory, not merely recommended. Proposed amendment: “Results shall be mandatorily disseminated through both AKIS and the CAP networks”.</p>	
<p>(a) support cooperation projects for innovation through operational groups based on the ‘interactive innovation model’ referred to in paragraph 4;</p>	<p>1. ‘interactive innovation model’ is referred in paragraph 3, not 4;</p> <p>2. It is proposed to clarify that projects should be "co-created and co-managed", including a consultative management element ("consultative manner").</p>	
<p>(b) link research and farming and forestry practice and inform the scientific community of the needs of those practices;</p>		
<p>(c) connect innovation actors and projects, particularly via the Union and national CAP networks;</p>	<p>It is proposed that connection be mandatory both through AKIS, as this is its function, and through the CAP networks.</p>	

Commission proposal	LT comments	LT questions
(d) promoting the use of innovative solutions through dissemination of information and knowledge, including farmer-to-farmer exchanges.		
3. The projects implemented by the EIP-AGRI operational groups shall be based on the ‘interactive innovation model’ that complies with the following principles:		
(a) develop innovative solutions focusing on the specific needs of farmers, forester holders and rural actors;		
(b) bring together partners with complementary knowledge such as academia, researchers and the farming community, and where relevant, actors of the food chain and ensure their active involvement in projects;		Maybe it is possible to specify how “active involvement in projects” should be understood?
(c) the projects are co-created and co-decided among the actors involved in the projects and implemented in a consultative manner, including ensuring the potential for scale up.		

Commission proposal	LT comments	LT questions
<p>Member States shall ensure that the key results of the projects referred to in this paragraph are disseminated through practice-oriented channels, including the national and Union CAP networks. The disseminated information shall include the objectives of the projects, participating partners, key thematic areas addressed, geographical location of the project, total budget, and the final outcome of the project, with focus on the practical innovative solutions developed.</p>	<p>1. These requirements for dissemination of results do not coincide with those provided in paragraph 2 of this article:</p> <p>“The aim of EIP-AGRI shall be to accelerate development and use of innovations by improving the exchange of knowledge and fostering synergies between policies, actors and instruments in agriculture, forestry and rural areas. Results from its work shall be disseminated and multiplied through the AKIS”</p> <p>2. AKIS should be explicitly mentioned as a key platform for the dissemination of information, alongside the CAP networks, reflecting its core purpose.</p>	
<p>4. Member States may grant support for projects of EIP-AGRI operational groups under the following conditions:</p>		
<p>(a) support may only be granted on the basis of an approved project plan that is based on the principles referred to paragraph 3;</p>		

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(b) the operational group implementing the project shall involve at least two different actors and shall contribute to one or more CAP-related specific objectives set out in Article 3, point (d), of Regulation (EU) [...] [NRP];		
Member States shall set objective criteria and transparent requirements for the content, the duration, the submission and approval of project plans to be drawn up by the EIP-AGRI operational groups.	It is proposed to establish clear evaluation criteria (quality, impact, innovativeness)	Will the project selection criteria be laid down in implementing acts/rules ?
5. Member States shall not provide support under this Article to knowledge sharing and innovation involving research bodies only.		
<i>Article 20</i> <i>Agricultural knowledge and innovation systems and farm advisory services</i>		
1. Each Member State shall ensure that farmers and forest holders have access to innovation and that new knowledge reaches them in a timely and effective manner, enabling them to deploy	1. It is proposed to emphasise that access to innovation should encompass not only	

Commission proposal	LT comments	LT questions
<p>innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p>	<p>access to information but also practical opportunities to participate in projects.</p> <p>2. Attention is drawn to the fact that the mandatory requirement ensuring agricultural stakeholders have guaranteed access to EIP-AGRI project-based activities, advisory and knowledge dissemination services, can only be effectively implemented if dedicated and ring-fenced financial resources are secured for such rural development interventions. Unfortunately, the current draft of the NRP Plan does not provide for such dedicated financial allocations.</p>	
<p>2. To meet the requirement laid down in paragraph 1, each Member State shall establish in the NRP Plan how innovations and up-to-date knowledge reach farmers, in particular through the Agricultural Knowledge and Innovation System (the AKIS). The AKIS shall include:</p>		<p>Are we referring only to farmers, or to other participants of the agricultural sector as well? It is worth noting that in the first paragraph we are also talking about forest owners.</p>
<p>(a) arrangements to ensure effective knowledge flows and synergies between advisors, researchers, practitioners, national CAP networks and other relevant stakeholders;</p>	<p>It is proposed to define more precisely the mechanism of knowledge flows</p>	

Commission proposal	LT comments	LT questions
	("knowledge flows") – whether through AKIS platforms or national CAP networks	
(b) actions to improve access for farmers and forest holders to impartial and qualified advice;		
(c) support for innovation as a part of the farm advisory services, particularly support for the EIP-AGRI operational groups referred to in Article 19 including for the use of the 'interactive innovation model' referred to in Article 19(4);	'interactive innovation model' is referred in paragraph 3 , not 4 of Article 19	
(d) a plan to improve dissemination and demonstration of research outcomes and innovative and sustainable solutions to farmers, forester holders and other end-users at a large scale;	<p>1. It is proposed to add the following: "AKIS shall actively disseminate EIP-AGRI results through demonstration farms and innovation brokers."</p> <p>2. It is proposed that the principle of "peer-to-peer learning" be included</p>	
(e) interventions set out in the NRP Plan supporting AKIS operation, in particular those referred to in Article 19, and their complementarity and coherence with relevant		

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national initiatives and other relevant measures set out in the NRP Plan;		
(f) a system for provision of farm advisory services, established in accordance with paragraph 3.	It is proposed that Member States maintain a public register of consultants, indicating qualifications, specialisations and measures to ensure independence.	
3. As part of the AKIS, Member States shall describe in the NRP Plans, and implement, a system for provision of farm advisory services to be established to support access to knowledge and wider deployment and use of innovations. The farm advisory services shall cover all the following elements:	The mandatory requirement for Member States to describe and implement within their NRP Plans a farm advisory services system as part of AKIS can only be fully implemented if secured financial resources are allocated for this type of rural development intervention . Unfortunately, the current draft of the NRP Plan does not provide such financial guarantees.	
(a) advice to farmers and forest holders on sustainable and resilient management of land, farms and forests tailored to farm types and different production systems, as well as on the requirements for support set out in the NRP	It is proposed to broaden the content of advisory services to include digital skills, bioeconomy innovations , and possibly social well-being aspects – while clearly specifying what is meant by these topics.	Regarding the requirement to “ raise awareness about mental health issues and the availability of relevant services, ” clarification is needed on what specific actions are envisaged , to what extent this

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Plans, including farm stewardship, setting-up and transfers of holdings and start-ups; business management, access to social support, raising awareness about mental health issues and availability of the relevant services; and the use of innovations, data-driven solutions and digital tools;		should be covered, and the causal justification of such inclusion
(b) targeted advice for young farmers, in particular as regards business management, access to finance, access to public support, access to knowledge and innovation.		
4. Member States shall ensure that farmers and forester holders have direct access to advisers, such as by providing public databases of advisers. Member States shall ensure that the advice provided to farmers and forest holders is impartial, and that advisers are suitably qualified and free from conflict of interest.	It is proposed that minimum impartiality standards for advisers be established at EU level , and that a common database be set up to monitor their activities	

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<p><i>Article 21</i> <i>Authority in charge of data governance under the CAP</i></p>		
<p>1. Each Member State shall designate one authority responsible for taking or coordinating actions to achieve and maintain national and cross-border interoperability between information systems used for the implementation, administration, monitoring and evaluation of the CAP for the benefit of farmers and other CAP beneficiaries. For the purposes of this Article, interoperability means the ability of information systems to interact with each other by sharing data by means of electronic communication.</p>		<p>Is cross-border interoperability between information systems and the European Digital Identity Wallet related to the adopted Interoperable Europe Act? What would “cross-border” mean in this article?</p>
<p>2. The designated authority shall have in particular the following tasks:</p>	<p>The Member States are unclear about the appropriate level of the coordinating institution: the ministry or its department, the paying agency or its department, or another institution (e.g., agricultural data centers or another ministry).</p>	
<p>(a) drawing up and submitting to the Commission a Roadmap at the level of the Member State to achieve and maintain</p>	<p>It would be appreciated to receive a sample of the Roadmap.</p>	

Commission proposal	LT comments	LT questions
interoperability (hereinafter the ‘Roadmap’) and follow up of Commission observations on the Roadmap;		
(b) coordination of the implementation, or, as decided by the Member State, implementation of the Roadmap in an efficient, effective and timely way.		
The Member States shall notify the Commission of the designation of the authority at the latest by [OPOCE: [within three months from the entry into force of this Regulation].	It is important that the accompanying legal acts be submitted to the Member States before that period	
3. The Roadmap referred to in paragraph 2 shall cover:		
(a) identification of needs to achieve and maintain interoperability as referred to in paragraph 1, and design of measures to address them as well as timeframe with milestones and targets for their implementation;	MS noted that there is a significant administrative and financial burden. It is unclear which stages of result achievement and objectives are being referred to.	

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(b) identification of possible synergies with other Union and national interoperability initiatives.	It should be noted that achieving interoperability between the European Commission's and national information systems entails a significant administrative and financial burden.	
<p>To the extent possible, Member States shall base their assessment of needs and the design of the measures on the principle that data is collected only once and re-used.</p> <p>For the elements referred to in the first subparagraph, point (a), the Member State shall consider in particular the need to establish a single digital identity framework and shall consider alignment with Regulation (EU) No 910/2014, including as regards the European Digital Identity Wallet for natural and legal persons.</p>		
<p>4. The Member States shall submit to the Commission by 16 December of each calendar year an annual report on the implementation of the Roadmap, assessing the progress of the implementation of the steps and measures and the timeframe set out in the Roadmap.</p> <p>Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the annual reports.</p>	The annual submission of the Roadmap will increase the administrative burden on the member state. To reduce this burden, the preparation of the report should be less frequent.	Why is the annual submission of the Roadmap's yearly report planned?

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Member States shall submit the first annual report to the Commission by 16 December 2029.		
5. The Commission is empowered to adopt delegated acts in accordance with Article 23, which are necessary to ensure that interoperability and seamless data exchange between information systems used for the implementation, monitoring and evaluation of the CAP are implemented in an efficient, coherent, effective and timely manner, supplementing this Article with rules where the implementation of the Roadmap referred to in paragraph 2 so requires as well as rules on interoperability measures referred to in paragraph 3, point (b).	<p>The guidelines for preparing the Roadmap and the implementing legislation must be approved. It must also be ensured that standardized data are used and shared vocabularies are introduced. Examples of the Roadmap have been provided by VN.</p> <p>It must also be defined which data should be included in the Roadmap.</p>	
6. The Commission may adopt implementing acts laying down rules on:		
(a) form and content of the Roadmap and annual report;	The guidelines for preparing the Roadmap and the implementing legislation must be approved. It must also be ensured that standardized data are used and shared	

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	<p>vocabularies are introduced. Examples of the Roadmap have been provided by VN.</p> <p>It must also be defined which data should be included in the Roadmap.</p>	
(b) arrangements for transmitting or making available to the Commission the Roadmaps and annual reports;		
These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 24.		