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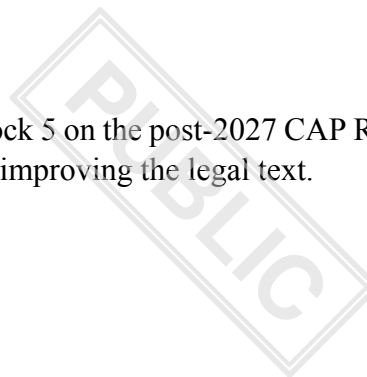
From:	General Secretariat of the Council
To:	Working Party on Horizontal Agricultural Questions (Post-2027 CAP)
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Subject:	Regulation establishing the conditions for the implementation of Union support under the CAP - Comments from Hungary on block V

Block 5. (Post-2027 CAP regulation) – Written Comments from HU

We are glad for the opportunity to provide written comments in relation to Block 5 on the post-2027 CAP Regulation. We ask and thank the Danish Presidency in advance to take our comments into consideration when further improving the legal text.

The Annex contains our reflection to **ST11733/25**.

Budapest, 4/12/2025



Article 18.:

Suggestions for modifications highlighted in bold:

1. 'LEADER' shall be taken as community-led local development referred to in Article 76 of Regulation (EU) [...] [NRP].

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.
2. Member States shall support LEADER at least in rural areas with specific disadvantages defined by the Member States in the NRP Plans.
3. Member States shall provide support through LEADER for projects implemented by local action groups, ***included in their local development strategies***, involving startups, ***local businesses***, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products, innovation, ***as well as investments in local infrastructure and services aimed at improving the quality of life in rural areas.***
4. Support provided from LEADER shall be focused on rural development fields with added value for farmers, forest holders ***and all other rural citizens*** such as social, environmental, digital and economic transformation of rural areas, improvement ***of quality of life*** of rural citizens, strengthening social capital, ***cultural and youth initiatives.***

Article 21.:

In relation to the ambitious objectives of Article 21, a number of practical, financial, and institutional issues need to be clarified in order to ensure successful implementation. We expect more detailed information from the Commission to clarify the following:

- the scope of the information systems concerned,
- the organizational model (independent authority or subordinate to the Managing Authority),
- the possible sources of financing,
- and the content and formal requirements of the roadmap.

Where and within what institutional and technical framework can this be implemented?

We consider it appropriate that this function should be performed not by an independent authority but by one of the organizational units of the paying agency under the supervision of the Managing Authority, thus operating under the supervision of the Managing Authority and financed from Managing Authority resources.

How much time is available to set up the interoperability authority?

I. Institutional and Governance Structure

Is it correctly understood that the term “authority” does not necessarily imply the creation of a new legal entity, but rather the designation of an existing body or organisational unit capable of performing and coordinating interoperability tasks, and that “designation” refers to the formal appointment and empowerment of such an entity? *(Art. 21(1))*

Can the Commission confirm that both the Paying Agency and the Managing Authority could be suitable for the role of the interoperability authority, provided that these bodies possess the necessary data-management, IT, and coordination capacities? *(Art. 21(1)–(2))*

Does the Commission plan to issue guidance or practical recommendations specifying the organisational (institutional and governance), technical, and data-management capacities required of the interoperability authority during its designation and operation? *(Art. 21(2))*

II. Timing and Feasibility

Is it correctly understood that the three-month deadline refers only to the formal designation of the interoperability authority and does not imply that the authority must become fully operational within this period? *(Art. 21(2))*

May a Member State first submit an initial, strategic version of the Roadmap and later provide more detailed versions, provided that the first version clearly defines the schedule, responsible actors, and key development steps? *(Art. 21(2)(a))*

When does the Commission plan to develop or publish a common template or methodological guidance on the content and format requirements of the Roadmap and annual reports, in order to ensure consistency and comparability among Member States’ documents? *(Art. 21(4) and 21(6)(a))*

Is it correct to assume that the deadline for the first annual report (16 December 2029) implies that Member States should have already launched the first phase of Roadmap implementation and be able to report on initial progress? *(Art. 21(4))*

III. Capacities and Financing

What human, IT, and institutional capacities are required to establish and operate the interoperability authority, particularly regarding coordination, data-management, and monitoring tasks? *(Art. 21 (2))*

Does the Commission intend to provide guidance on the minimum capacity levels and core functional requirements to ensure that Member States can assess and allocate resources on a consistent basis? *(Art. 21(2))*

What funding sources can be used to finance the operation of the interoperability authority and the implementation of the Roadmap — for instance, the CAP Technical Assistance, the Digital Europe Programme, or national financing? *(Art. 21(1), (2))*

Will the Commission provide IT infrastructure or platform (e.g. shared data-exchange tools or interoperability solutions) to support interoperability between Member States? *(Art. 21(5))*

Does the Commission plan to launch EU-level support schemes — such as pilot projects or joint development initiatives — to enhance cross-border cooperation and data sharing in the field of interoperability? *(Art. 21(3)(b), 21(5))*

IV. Linkages with Existing Systems

Which information systems are required to be interconnected to ensure interoperability in the implementation of the CAP? *(Art. 21(1)–(3))*

How will the tasks of the designated interoperability authority relate to existing national monitoring, information, and data-warehouse systems (particularly those operated by the Hungarian State Treasury)? *(Art. 21(3)(b), (5))*

How can the coordination of digital developments be ensured to avoid overlaps and resource duplication in achieving interoperability under the future Single Fund framework (Art. 21(3)(b), (5))?

Is it expected that Member States carry out a detailed data- and system-mapping exercise before drafting the Roadmap, to ensure that interoperability measures build on existing systems? *(Art. 21(3)(a))*

How can the principle of “data collected once, reused many times” be effectively applied in the implementation of the CAP? We invite the Commission to support its enforcement through practical guidance and examples of good practice. *(Art. 21(3))*

V. The Content and Purpose of the Roadmap

What mandatory elements must the Roadmap include, particularly regarding objectives and milestones? *(Art. 21(3)(a))*

Does the Commission expect the Roadmap to specify not only technical and operational steps but also the necessary resources and responsibilities, or is it sufficient to outline the planned measures only? (*Art. 21(3)*)

Is it correct to assume that aligning the preparation and implementation of the Roadmap with Hungary's National Digitalisation Strategy (2022–2030) and National Electronic Administration Strategy (2022–2030) is not only permitted but also encouraged under the spirit of EU regulation? (*Art. 21(3)(b)*)

According to Article 21(4), the Roadmaps may be amended. Which elements of the Roadmap (e.g. objectives, measures, timeline, resources) may be updated in subsequent reporting cycles, and under what procedural conditions? (*Art. 21(4)*)

How does the Roadmap relate to the Performance Framework — will its implementation form an integral part of the CAP's performance assessment and annual reporting process? (*Art. 21(1), 21(4)*)