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CONTRIBUTION

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To:	Working Party on Horizontal Agricultural Questions (Post-2027 CAP)
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COMMENTS ON THE PROPOSAL FOR A REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ESTABLISHING THE CONDITIONS FOR IMPLEMENTING UNION AID TO THE COMMON AGRICULTURAL POLICY FOR THE PERIOD 2028–2034. BLOCK V (04.11.2025)

Article 18

Article 18.1

Given the importance of this measure for the agricultural sector, regardless of its direct link to rural areas in general, for the sake of legal clarity, it is requested that this measure be fully regulated in the CAP Regulation.

Reference is made to Article 76 of the Regulations of the Single Fund or Country Plan, which states: “Participatory local development must: (b) be designed and implemented by local action groups composed of representatives of local public and private actors, in which no interest group controls decision-making;” This contradicts the limitation established in Article 18 regarding the composition of the Local Action Groups (Article 18.3) and the type of projects that LEADER should support (Article 18.4). Focusing the composition of the groups and the type of projects to be supported by LEADER on the agricultural sector would mean that this sector would control decision-making in participatory local development, excluding the other social and economic sectors of the area in question.

In addition to all of the above, it should not be overlooked that no specific funds have been allocated for LEADER or for rural development in general for the 2028-2034 programming period.



A policy as specific to rural areas as cooperation should not be lumped together with the general policies of the single fund, with LEADER projects competing with other projects that will ultimately have no impact on rural communities.

If there is one rural development policy that has been successful to date, it is precisely LEADER, since by its very conception and design, it is made for rural areas, by rural stakeholders, who are the ones who best understand rural realities and the specific needs of the territory. This funding should remain in its current status: with its own dedicated and specific funds for its implementation.

Article 18.2

Point 2. The proposed regulation states in Article 18.2 that Member States will support LEADER at least in the rural areas with specific disadvantages defined by Member States in their NRP Plans. The Commission is requested to provide guidance so that Member States can define "rural areas with specific disadvantages" in their NRP Plans. What criteria should be used to classify a rural area as having specific disadvantages? Will the European Commission establish these criteria? Will Member States and regions have the freedom to define them?

It would be helpful to know what criteria will be taken into account to define these areas with specific disadvantages. Can support be given to areas other than rural areas with specific disadvantages? it raises doubts as to whether it is only mandatory for 'rural areas with specific disadvantages'.

Article 18.3:

It appears that the composition of Local Action Groups is somewhat limited. It should be argued that the variety of actors participating and collaborating with LEADER are responsible for its success in previous programming periods. Limiting the groups to agents exclusively related to agriculture would violate the principle of public-private



and multi-sectoral collaboration that characterizes the LEADER method, as well as limit its effectiveness in rural areas and its capacity to stimulate development.

LEADER should seek to broaden the participation of different social, business, and public groups to effectively respond to the needs and problems of each region. The greater the variety of stakeholders involved, the greater the collaboration will be in developing strategies, and the easier it will be to identify which projects contribute the greatest added value to the territory

Article 18.4:

The wording of this article appears to somewhat restrict both the composition of local action groups (Art. 18.3) and the type of projects they must support (Art. 18.4). The Commission is requested to clearly state in the wording of these two sections that, while both local action groups and projects must adhere to the guidelines established by the regulation, they may include other components or support other projects, thus maintaining the degree of flexibility that LEADER has enjoyed in different programming periods.

Focusing LEADER's activities on projects with added value for farmers and foresters significantly limits the development and revitalization of rural areas, which do not necessarily have to be solely linked to agriculture and forestry. LEADER has enjoyed considerable flexibility in all programming periods, allowing it to adapt to the specific needs of each region, supporting its weaknesses and most urgent issues.

It should be emphasized that rural areas need tools that revitalize their economies, not tools that focus solely on the agricultural sector. The needs of rural areas are a multi-sectoral problem that must be addressed from different perspectives. Limiting LEADER to the agricultural sector risks overlooking other sectors and stakeholders that are equally essential in rural areas, and undermines the principle of innovation and cooperation among diverse territorial actors.



It should be noted that in point four of the article in question, where the aspects addressed in this intervention are listed, "strengthening social capital" appears at the end as one of them, resulting in a seemingly incongruous concept that requires further clarification.

In the draft of Article 77 of the new regulation for the fund, point 2 states that the aid granted under this article may cover the costs of preparing local development strategies, the costs of implemented operations, or a combination of both. Member States shall ensure that the expenditure of operations complies with the requirements established for the relevant types of interventions as set out in this Regulation. We would like to know what these requirements are and how they relate to Article 18 of the CAP Regulation.

Articles 19 y 20

In Article 19, intervention should not be mandatory, especially since its funding is not included in the CAP budget (ring fencing).

In the case of the EIP, section 4(a) seems to stipulate that Member States may only provide support to EIP-AGRI projects "on the basis of an approved project plan that complies with the principles set out in paragraph 3." This condition is unclear. What is meant by an approved project plan? The wording is both confusing and ambiguous. The COM is requested to gather more information on the concept of an approved project plan (does it refer only to the innovative project or to funding other actions related to it, but not the project itself?).

It is unclear what other aspects of the EIP-AGRI could be funded to promote the adoption of the groups' results. Clarification is requested on the eligibility of projects affecting the agri-food industry, that we believe should be included with their correspondent budget.

It should be reiterated that all types of innovations are covered, with this addition taken from the previous period.



Regarding Article 20, we would like to know if section (m) of Article 5 includes support for advisory services “(m) support for knowledge sharing and innovation in agriculture, forestry and rural areas”.

Indeed, this is a mandatory intervention (shall) that is not listed in the types of intervention in Article 11.

Providing advice has always been mandatory (at least in the last two programming periods), but what has never been mandatory for the EAFRD is programming and financing advisory interventions. For this reason, we believe it should be a voluntary intervention.

This intervention is aimed solely at farmers and forest managers. The range of possible activities in rural areas is much broader, so advice should be provided to other CAP beneficiaries who receive support for land management or farm management, as is currently the case with the CAP Strategic Plan.

Advisory services fall under the AKIS framework, but this intervention is completely vague: it appears that neither support for the provision of advisory services nor for their creation is being considered. This is a very general version of Article 19(b). Confirmation is requested from the Commission that both the provision of advisory services and their creation will receive aid, as is currently the case with the intervention of the CAP Strategic Plan. This would seem to be the case based on Article 19, but we need confirmation from the Commission.

Article 21

While the article has a positive initial assessment since Spain, with its SIEX (Information System for Agricultural Holdings), is in line with what is indicated therein. It includes the provision that the Commission is empowered to adopt delegated acts and may adopt implementing acts, something not indicated in the simplification package. A heavy reliance on delegated and implementing acts that the Commission might adopt to define key aspects of the article (form and content of the roadmap,



interoperability measures, etc.) could generate legal uncertainty and a lack of predictability for Member States, which might have to adapt their information systems after the fact.

Delegated and implementing acts should not interfere with work already carried out and could lead to a review or reformulation of everything already done, wasting months, if not years, of work, given that generic obligations without a concrete and operational implementation plan can hinder proper execution.

“Interoperability” is a very broad concept, but not very practical if its methodology is not defined beforehand. The draft mentions the need for national and cross-border interoperability between information systems, but it does not define how to achieve this or specify concrete technical standards. We understand that this interoperability should be in English and that the body integrating this data should be led by the paying agency. It indicates that the data is collected once and reused, but it does not detail mechanisms to prevent duplication.

The requirement to submit "annual reports on the implementation of the Roadmap" implies an overload of technical and bureaucratic work, especially within decentralized states.