



Council of the European Union
General Secretariat

Brussels, 05 November 2025

WK 14320/2025 ADD 22

LIMITE

**AGRI
AGRIFIN
CADREFIN
FIN
CODEC
ENV
FORETS**

This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.

CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Horizontal Agricultural Questions (Post-2027 CAP)
N° Cion doc.:	ST 11733 2025 ADD 1 COR 1 + ST 11733 2025 ADD 1 + ST 11733 2025 INIT
Subject:	Regulation establishing the conditions for the implementation of Union support under the CAP - Comments from Sweden on block V

Written questions from Sweden regarding block 5 of the CAP proposal

Article 18

1. Why is Leader regulated in both the CAP and the NRP proposals?
2. What obligation falls on a Member State if there is no interest to form Leader groups in certain parts of the specifically designated areas?
3. Are there any guidelines/limitations Member States must adhere to when it comes to defining specifically designated areas?
4. Regarding paragraph 3, is the list of different types of projects, to which support under Leader can be provided, exhaustive or indicative?
5. To what extent can Member States set the thematic scope of Leader projects?
6. How does support for start-ups and diversification of agricultural activities under Leader relate to support opportunities under Article 14? Does the Commission see a risk of double financing, as two types of supports with similar aims will be offered?

Article 19

1. At the WP meeting, the Commission explained why innovation support should not be given for innovation involving only research bodies. Is it correct that support for knowledge sharing may not be given to a research body as a sole beneficiary as well, and what is the reason for that? Since bridging the gap between research and practice is essential for developing AKIS, the limitation described in paragraph 5 appears too restrictive. Support for knowledge sharing can play an important role when it comes to compiling results from research and making them accessible for a practice-oriented target group. Member States should have the flexibility to decide who is most suitable for the purpose.
2. Is it mandatory for Member States to provide support for innovation and knowledge sharing within all three areas mentioned in paragraph 1 (agriculture, forestry and rural areas) or can Member States choose to provide support within only one of the mentioned areas? Is it possible to replace mandatory measures within CAP with nationally financed measures?

3. Can the Commission elaborate on the meaning of paragraph 3 (c), which states that the potential for scaling up shall be ensured, especially what this will entail in terms of requirements for the operational groups?
4. Is there a risk that innovative and exploratory elements are lost, if focus is placed exclusively on projects for which the potential for scaling up can be assumed from the onset? Should it instead be possible to follow up on successful projects with further support for the scaling up?

Article 20

1. Are 19(1)(b) and Article 20 overlapping and can Member States support all the parts identified by Member States under Article 20 with support through Article 19(1)(b)?
2. Can the system for advisory services, as described in paragraph 3, be built upon existing systems, which are partly, or fully, financed outside of the CAP?
3. Do Member States have to provide advisory services covering all the mentioned areas in paragraph 3 (a) to *both* farmers and forest holders, especially in the light of the fact that forestry is only a marginal part of CAP?
4. Does paragraph 3 mean that support for advisory services is limited to farmers and forest holders? If yes, what is the reason for this limitation, especially since Article 20 will not be financed from the ringfenced CAP budget?
5. Paragraph 3 (a) states that advisory services shall cover the requirements for support set out in the NRP Plans - what will be required from Member States in this regard? Would it be enough to ensure publicly accessible information about the different types of supports and associated eligibility requirements on the webpage of a managing authority?
6. What does the reference to Article 20(3) in Article 19(1) mean? Is it enough that Member States describe AKIS, and the needs for advisory services, in the NRP plans to be able to support the advisory services?
7. To what extent will Member States be responsible for providing impartial and qualified advice, free from conflict of interests to farmers and forest holders?

Article 21

1. Will the Commission provide guidance on common data models, semantic structures and technical standards? If no, should the development be expected to come mainly from Member States adopting results from EU projects (e.g. Common European Agricultural Data Space, CEADS, and European Digital Infrastructure Consortia, EDIC)?
2. Who will have the ultimate responsibility for defining interoperability across the EU and what role will nationally responsible authorities play in implementing and coordinating interoperability efforts at EU level?
3. How does the roadmap in Article 21 relate to:
 - the European Land Monitoring System (as defined in Article 70 of the NRP Regulation);
 - the annual reporting of the NRP plan and the exchange of information between authorities involved in work related to the NRP plan (e.g. details of the applicant for double funding verification and authorised signatory)?Are they parts that should be included in the roadmap?
4. How will interoperability be promoted at EU level through the implementation of the CAP and how will the Commission support national interoperability initiatives?