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CONTRIBUTION

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Portuguese Comments

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Block 5 -- Articles 18 to 21

[Article 18 – LEADER]

(Paragraph 2) Can the Commission clarify why there is no reference in this Article to Articles 74 and 77 of the NRP Regulation?

The LEADER approach remains mandatory, as the CAP Regulation states that "Member States shall provide support under LEADER." However, unlike the current framework, no minimum financial allocation is defined for the LEADER programme. The determination of the allocation is left to the discretion of each Member State. We consider that this approach creates a risk of fragmented and uneven territorial coverage, potentially excluding rural areas --- including the most remote and peripheral ones --- from bottom-up approaches that should be driven by local and regional communities.

In this regard, we support the inclusion of a minimum percentage allocation for LEADER/rural CLLD in the NRP Regulation.

Furthermore, as LEADER is considered one of the types of intervention under the CAP but is financed by non-ringfenced funds, it should be clearly specified which types of beneficiaries may be supported under this intervention.

(Paragraphs 3 and 4) Can the Commission clarify whether the eligibility criteria referred to in these paragraphs are merely illustrative? We believe it is important that the Commission clarify the objective pursued through these paragraphs.

[Article 19 -- Support for knowledge sharing and innovation in agriculture, forestry and rural areas]

Promoting partnerships and knowledge exchange through the establishment of an Agricultural Knowledge and Innovation System (AKIS) is one of the requirements to be included in the Partnership Plans.

(Paragraph 1) Can the Commission confirm that it will remain possible to support both the supply and demand of advisory services, i.e. the establishment of advisory services as well as their provision?

Can the Commission also confirm that EIP-AGRI operational groups focusing exclusively on addressing the needs of rural areas can continue to be supported?

(Paragraph 3) Why is there no reference to the forestry sector and rural communities in point (b)?

Can the support for innovation provided for in this Article also include projects based on the adaptation of traditional practices to new geographical or environmental contexts?

The Commission has clarified that investments under an operational group project follow the rules of Article 13 of the CAP Regulation when implemented by a farmer or forester, while they follow the NRP Regulation when implemented by another type of beneficiary from the same operational group. This distinction appears to make the management of such projects too complex for both partners and managing authorities.

[Article 20 -- Agricultural knowledge and innovation systems and farm advisory services]

Can the Commission confirm that it will remain possible to support transnational and cross-border operational groups?

(Paragraph 1) Member States are obliged to ensure new knowledge reaches farmers and forest holders in a timely and effective manner. Can the Commission clarify and give examples of what it means by "in a timely...manner"?

(Paragraph 3) The farm advisory services shall cover (...) b) targeted advice for young farmers, in particular as regards business management, access to finance, access to public support, access to knowledge and innovation.

As well as young farmers, why not include new farmers?

[Article 21 -- Authority in charge of data governance under the CAP]

We support the objective of reducing administrative burden and improving policy monitoring through the principle of "collect once, use many times."

At this stage, we have a number of requests for clarification.

What will be the framework governing the relationship between the Authority responsible for CAP data governance and the other governance structures established under the NRP Regulation? Will this be defined at EU level, or left entirely to the Member States?

(Paragraph 1) How does the Commission envisage that the Authority responsible for CAP data governance will ensure cross-border interoperability between information systems?

What is the specific objective of this reference?

(Paragraph 2) The designated authority shall have to (...) (a) draw up and submit to the Commission a Roadmap (...) and follow up of Commission observations on the Roadmap.

Are the Commission's observations legally binding? If so, do they constitute a Decision within the meaning of Article 288 of the Treaty, or are they to be considered recommendations, and therefore non-binding? The text should clarify this point to ensure legal certainty.

Can the Commission confirm whether the Roadmap of measures to be prepared by this Authority will be subject to Commission approval?

Will the timeline for the presentation of this Roadmap by the Member State authority be defined in an implementing act, given that, unlike the annual report, this obligation is not explicitly mentioned in the Article?

(Paragraph 5) The proposal states that delegated acts may be established, if necessary, regarding the implementation of the Roadmap and measures for interoperability with other Union and Member State initiatives. We consider these provisions to be insufficiently precise.

Can the Commission clarify and further detail the scope of the delegation of powers provided for in this paragraph?