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Subject:	Regulation establishing the conditions for the implementation of Union support under the CAP - Comments and drafting suggestions from the Member States on Block V

WK 3995/2026 INIT

LIMITE

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**Consolidated comments on block V from
AT, BE, CZ, DE, DK, EE, FI, FR, HR, IE, IT, LT, LV, LU, NL, PL, RO, SE**

CY PCY suggestions	Drafting suggestions and Comments
<p>Article 18 LEADER</p>	<p>DE (Comments):</p> <p>DE: On 4th March, we have commented on Titel XI of the NRPP Reg: <i>„Regarding off-farm investments in rural areas (including village renewal, small rural infrastructure, land restructuring and reallocation, flood and coastal protection actions), we would like to repeat our request for clarification as to how and under which provisions of the new legal framework these policies can be implemented. (Neither cooperation nor integrated approaches are suitable.)“</i> Regarding the strong interlinkages of general rural development and LEADER, we consider it important that the CAP WP keeps this open question in mind.</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>BE (Drafting suggestions):</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 and 77 of Regulation (EU) [...] [NRP] and as further specified in their NRP Plans.</p> <p>BE (Comments):</p> <p>Reference should be made not only to article 76 but also to Article 77 (Support under LEADER) of the same regulation. Article 77 sets requirements to comply with in order to provide support through LEADER.</p> <p>EE (Drafting suggestions):</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>EE (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>Support for preparing LEADER local development strategies should not be mandatory. MS should be allowed to support preparation of local development strategies if it is needed. For example, if MS has not supported the preparation of new LEADER/CLLD local development strategies from the funds of the period 2021-2027. In our understanding there is no rule that does not allow to support preparation of new strategies from the funds of 2021-2027 programming period.</p> <p>IE (Drafting suggestions):</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 and 77 of Regulation (EU) [...] [NRP] and as further specified in their NRP Plans.</p> <p>PL (Drafting suggestions):</p> <p>1a. ‘LEADER’ means community-led local development referred to in Article 76 of Regulation (EU) of... [NRP].</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>PL (Comments):</p> <p>The introduction of new paragraph 1a. will clarify and define what LEADER is. Furthermore, this is consistent with the current programming period, where LEADER was defined in this way.</p>
<p>2. Member States shall support LEADER at least in rural areas with specific disadvantages defined by the Member States in the NPR<u>NRP</u> Plans.</p>	<p>BE (Drafting suggestions):</p> <p>2. Member States shall support LEADER at least in rural areas with specific disadvantages defined by the Member States in the NPR<u>NRP</u> Plans</p> <p>BE (Comments):</p> <p>It is not relevant to create a "subcategory" of rural areas, But it is relevant to give freeway to MS or regions to define rural areas (Cfr MT informal query on rural area definition)</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>DE (Drafting suggestions): 2. Member States shall support LEADER at least in rural areas with specific disadvantages defined, if relevant on a regional basis, by the Member States, in the <u>NRP</u> Plans.</p> <p>DE (Comments): Clarification esp. in case of MS with federal or regionalized structures</p> <p>IE (Drafting suggestions): Member States shall support LEADER in all rural areas, including those at least in rural areas with specific disadvantages defined by the Member States in the <u>NPRNRP</u> Plans.</p> <p>IT (Drafting suggestions): 2. Member States shall support LEADER at least in rural areas with specific disadvantages defined as set out by the Member States in the <u>NPRNRP</u> Plans.</p> <p>IT (Comments): Member States such as Italy opted for a national methodology to identify rural areas since programming period 2007-2013. In this regard, Italian national methodology application determines rural areas with specific disadvantages as well. If “defined” term stays in such paragraph and it is read strictly, some Member States will be asked to describe (that is “define”) national methodology application to identify such rural areas within 2028-2034 Plan. Take into consideration that 2023-2027 CAP Strategic Plan did not request to describe in full such methodology. In order to avoid any misunderstanding, “defined” could be changed with “set out”.</p> <p>LT (Drafting suggestions): Member States shall support LEADER at least in rural areas with specific disadvantages as defined by the Member States in the NPRNRP Plans.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>LT (Comments): We propose not to increase the administrative burden by requiring the identification of specific negative circumstances / disadvantages in rural areas. Instead, support for the LEADER approach should be ensured across all rural areas as defined by the Member State. The LEADER method, based on bottom-up local development, is sufficiently flexible to address diverse territorial needs without additional classifications. This ensures continuity, equal treatment of rural areas, and compliance with the principles of proportionality and simplification.</p> <p>LU (Drafting suggestions): 2. Member States shall support LEADER at least in rural areas with specific disadvantages defined by the Member States in the <u>APR/NRP</u> Plans.</p> <p>LU (Comments): MS shall be able to freely define the criteria of “rurality” which shall not be linked to a criterion of disadvantageous. The approach that many MS have chosen to define rurality on the basis of population density should remain manageable.</p> <p>RO (Drafting suggestions): Member States shall support LEADER at least in rural areas with specific disadvantages defined by the Member States in the NRP Plans.</p> <p>RO (Comments): The current wording of Article 18(2) may be interpreted as encouraging the allocation of financial support to disadvantaged rural areas. While supporting these territories is important, such an approach may reduce the effectiveness of LEADER, whose objective is to create partnerships between more developed and less developed areas so that the community as a whole can prosper. In this context, we consider it necessary to re-examine these provisions in order to encourage integrated territorial development, rather than an automatic prioritization of certain areas at the expense of others.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>3. Member States shall provide support through LEADER for projects <i>implemented by local action groups</i> involving startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation.</p>	<p>AT (Drafting suggestions): Member States shall provide support through LEADER for projects implemented by local action groups involving rural business start-ups, value added capacity in transformation and innovation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation and all aspects benefitting the local communities and rural areas.</p> <p>AT (Comments): Ensuring coherence with the recent presidency drafting suggestions on block 4 “rural business start-ups” (for example in Articles 5 and 14). The scope of LEADER has to be broader, as non-agricultural actors from civil society and rural economy also have an important role in creating vibrant rural areas.</p> <p>BE (Drafting suggestions): 3. Member States may shall provide support through LEADER for projects implemented by local action groups such as involving startups, value added capacity in product transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation, <u>or other local actors such as culture, tourism, ...</u></p> <p>BE (Comments): Leader is not limited to businesses activities and has to respect a bottom-up approach. LEADER may cover transformation activities of wooden, agricultural or non-agricultural products based on agricultural products.</p> <p>CZ (Drafting suggestions): Support provided through LEADER focuses on rural development domains with added value for the territory of the LAGs. Through LEADER is provided support to projects involving projects for farmers and forest holders, and other entities whose goal is the social, environmental, digital and economic transition of rural areas, improvement of well-being of rural citizens, strengthening social capital. Member States shall provide support through LEADER for projects</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>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.</p> <p>CZ (Comments): It is essential to have a clearly defined who may be a beneficiary and which types of projects are eligible for support under LEADER, given the emphasis on added value and the absence of opportunities for cooperation among different local action groups</p> <p>DE (Drafting suggestions): 3. Member States shall provide support through LEADER for projects implemented selected by local action groups involving startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation and relevant aspects of activating the local communities.</p> <p>DE (Comments): Clarification in respect of COM answer V.11 in WK 1916/2026: The scope of LEADER is not limited to farmers/forest holders. LEADER is a territorial development tool and all the features of LEADER approach are mandatory according to the Articles 76 and 75 of the proposed NRPP Regulation. This includes integrated territorial development strategies at subregional level and public-private partnership, in which no single interest group controls the decision making. Moreover, Article 18(4) of the proposed CAP Regulation refers to LEADER supporting “social, environmental, digital and economic transformation of rural areas, improvement of well-being of rural citizens, strengthening social capital”, which have added value to farmers and forest holders.</p> <p>DK (Drafting suggestions): 3. Member States shall provide support through LEADER for projects involving including, but not limited to startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation.</p> <p>DK (Comments): DK notes that the wording might limit the kind of projects that LEADER could support. It is important to be aware of the fact that LEADER support is not limited only to farmer and farmer-related activities.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>FR (Drafting suggestions):</p> <p>3. Member States shall shallmay provide support through LEADER for projects involving startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation.</p> <p>FR (Comments):</p> <p>FR : Cette modification souhaitée par les autorités de gestion régionales vise à apporter de la subsidiarité de nature à favoriser le développement de synergies avec l'ensemble des Groupes d'Action Locales (GAL) "hors champ de la PAC" et les Groupes d'Action Local pour la Pêche et l'Aquaculture (GALPA), en permettant de mettre en œuvre une stratégie de Développement Local menée par Les Acteurs Locaux (DLAL) non rattachés à l'article 18 (LEADER), avec toutefois le même objet (territoires ruraux, types de projets ciblés), mais avec uniquement l'article 76 du règlement PPNR comme base réglementaire. Cela faciliterait la cohérence avec les DLAL sur de nombreux territoires, notamment côtiers. Les autorités de gestion seraient ainsi libres du choix le plus adéquat.</p> <p>EN : This change, requested by regional management authorities, aims to promote subsidiarity in order to foster synergies with all Local Action Groups "outside the scope of the CAP" and Local Action Groups for Fisheries and Aquaculture, by enabling the implementation of a Local Development Strategy led by Local Actors not covered by Article 18 (LEADER), but with the same purpose (rural areas, types of projects targeted), and with only Article 76 of the PPNR regulation as a regulatory basis. This would facilitate consistency with Local Development Strategy led by Local Actors in many areas, particularly coastal areas. The managing authorities would thus be free to choose the most appropriate optio</p> <p>HR (Drafting suggestions):</p> <p>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.</p> <p>If new Local Development Strategy is to be prepared, funds allocated to program LEADER in strategic plans for period 2023.-2027, should be eligible for preparatory activities for CAP 2028-2034.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>HR (Comments): It should be enabled to use funds from the current programming period for the preparation of Local Development Strategies for the period post 2027. Therefore, HR proposal would be to add provision in this article to prescribe that. Or to stipulate that current LDS are valid and eventually could be implemented in period post 2027 with substantive changes (where needed) included in current LDS in line with circumstances and relevant analyses.</p> <p>IE (Drafting suggestions): 3. Member States shall provide support through LEADER for projects that promote employment, growth, gender equality, social inclusion and local development in rural areas, including those 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.</p> <p>IT (Drafting suggestions): 3. Member States shall provide support through LEADER for innovative, integrated, and multisectoral projects implemented by local action groups that strengthen the economic, social, and environmental vitality of rural areas such as by promoting involving quality-of-life services, actions to combat climate change, valorization of local resources, startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation.</p> <p>IT (Comments): MSs need flexibility with an open list of both historical and new types of fields to cover.</p> <p>LU (Drafting suggestions): 3. Member States shallmay 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.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>LU (Comments): With the other innovation/transition related instruments (AKIS, cf Art. 20, Transition plans Art. 10 (1) (b), Start-up support Art. 14), there are sufficient mandatory interventions that support the transition/establishment of farms/start-ups. Therefore this topic under LEADER should remain voluntary.</p> <p>NL (Comments): NL: why is local action groups deleted? Could the Commission explain the reason behind this?</p> <p>RO (Drafting suggestions): 3. Member States shall provide support through LEADER for projects <u>that contribute to the integrated development of rural areas. Such projects may address a broad range of fields, including economic, social, community-based, environmental, cultural, educational and digital development, as well as innovation, entrepreneurship, diversification of local economic activities, improvement of the quality of life and well-being of rural citizens, strengthening of social capital and community resilience, and the sustainable management of natural resources.</u></p> <p>RO (Comments): The provisions of Article 18(3) place almost exclusive emphasis on the economic sector and on supporting farmers and foresters, which may lead to restrictive interpretations regarding the application of the LEADER approach, thereby risking to undermine its “bottom-up” character. Considering the LEADER principles established at European level, it is essential that LEADER retains its multi-sectoral character, allowing Local Action Groups (LAGs) to support projects tailored to local needs — including social, educational, cultural or community initiatives. In this regard, we consider it necessary to complement or reformulate the current provisions so that they clearly reflect that LEADER can support a broad range of local interventions, in the spirit of active participation of the local population in the planning, decision-making and implementation of local development strategies.</p> <p>SE (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>3. Member States shall provide support through LEADER for projects implemented by local action groups which may involving startups, value added capacity in transformation, diversification of farm activities, including agrotourism, direct sale of agricultural products and innovation.</p> <p>SE (Comments): Sweden would like the provisions on Leader to be as flexible as possible for the Member states in terms of implementation, beneficiaries, extent and structure.</p>
<p>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<u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p>	<p>AT (Drafting suggestions): 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<u>transition</u> transformation of rural areas, improvement of well-being of rural citizens, improvement of ecological functions and resilience of ecosystems and strengthening social capital, thus creating added value for rural communities, including farmers and forest holders.</p> <p>AT (Comments): The LEADER principle corresponds to an integrated, participatory regional development with a bottom-up approach. This principle aims at multisectoral development for the whole population in rural areas, including farmers. The wording should therefore be adapted in a way that projects are not restricted to agricultural or forestry added value, provided that they serve the overarching goals of rural and regional development. This amendment is also in line with the answers of the Commission in Working parties and the Annex of the first letter of the President of the Commission on 9 November 2025.</p> <p>BE (Drafting suggestions): 4. Support provided from LEADER shall be focused on rural development fields with added value for rural citizens, including for farmers and forest holders, such as social, environmental, digital and economic transformation<u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>BE (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>All categories of the population in rural areas are targeted. Cfr “... rural citizens ...” See also the answer to question 11 in the Q&A on Block V where it’s mentioned that the scope of LEADER is not limited to farmers and forest holders.</p> <p>CZ (Drafting suggestions): 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<u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital</p> <p>DE (Drafting suggestions): 4. Support provided from LEADER shall be focused on rural development fields with added value for <u>rural communities with</u> farmers and forest holders <u>as relevant part of it</u>, such as social, environmental, digital and economic transformation<u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital, <u>basic services and improvement of general living conditions including added value for women.</u></p> <p>DE (Comments): See under para 3</p> <p>DK (Drafting suggestions): 4. Support provided from LEADER shall be focused on rural development fields with added value for <u>rural citizens</u>, farmers and forest holders, such as social, environmental, digital and economic <u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>DK (Comments): DK suggests to include rural citizens, so that there is no doubt as to the beneficiaries of the support provided through LEADER.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>EE (Drafting suggestions): 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 transition of rural areas, improvement of well-being of rural citizens, strengthening social capital <u>and added value for farmers, rural enterprises and forest holders.</u></p> <p>EE (Comments): Rural enterprises should also be included as one of the focus fields supported from LEADER in addition to added value for farmers and forest holders.</p> <p>FI (Drafting suggestions): Support provided from LEADER shall be focused on rural development fields with added value for farmers, <u>rural communities</u> and forest holders, such as social, environmental, digital and economic transition of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>FI (Comments): LEADER funding is widely used in the rural areas and very important also for rural communities.</p> <p>FR (Drafting suggestions): 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 transition of rural areas, improvement of well-being of rural citizens, strengthening social capital. <u>It should serve all stakeholders in rural areas, with added value for farmers and foresters.</u></p> <p>FR (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>Cette modification vise à mettre en cohérence la rédaction du paragraphe avec la réponse de la Commission européenne sur le périmètre d'éligibilité des projets, qui reste inchangé par rapport à l'actuel programmation PSN et vise tant les activités agricoles que rurales, y compris hors-agricoles (réponse V.11 du document WK 879/2026 ADD 4).</p> <p>EN : This amendment aims to bring the wording of the paragraph into line with the European Commission's response on the eligibility scope of projects, which remains unchanged from the current NSP's program and covers both agricultural and rural activities, including non-agricultural activities (response V.11 of document WK 879/2026 ADD 4).</p> <p>IE (Drafting suggestions):</p> <p>4.Support provided from LEADER shall be focused on rural development fields with added value for all rural citizens 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.</p> <p>IT (Drafting suggestions):</p> <p>4. Support provided from LEADER shall be focused on rural development fields with added value for farmers, and forest holders and rural population, such as social, environmental, digital and economic transformationtransition of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>IT (Comments):</p> <p>Leader approach is historically addressed to population living in rural areas, as well.</p> <p>LV (Drafting suggestions):</p> <p>4. Support provided from LEADER shall be focused on rural development fields with added value for farmers and forest holders and rural citizens, such as social, environmental, digital and economic transformationtransition of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>LV (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>Considering that the support provided by LEADER covers a broader scope of rural development areas and is aimed at the overall development of rural territories, based on a bottom-up approach, point 4 should be supplemented with a reference to the added value of LEADER support not only for farmers and forest holders, but for all rural citizens.</p> <p>LU (Drafting suggestions): Support provided from LEADER shall be focused on rural development fields with added value for <u>improving the quality of life of farmers and forest holders rural inhabitants</u>, such as social, environmental, digital and economic transformation <u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>LU (Comments): Farmers and forest holders are rural inhabitants. It should be clearly stated that LEADER as tool benefits all types of rural inhabitants, not just farmers or forest holders. The benefit LEADER creates goes beyond economic added-value: https://eu-cap-network.ec.europa.eu/training/evaluation-learning-portal/evaluation-leader-and-leader-added-value_en</p> <p>NL (Drafting suggestions): Support provided from LEADER shall be focused on rural development fields with added value for farmers, forest holders and the rural community at large, such as social, environmental, digital and economic <u>transition</u> of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p> <p>NL (Comments): NL: LEADER is an instrument which has a broad scope of interventions. The target group consists of farmers, forest holders but in general the rural community as a whole.</p> <p>PL (Drafting suggestions): 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 transition of rural areas, improvement of well-being of rural citizens, strengthening social capital.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>PL (Comments): Removing this section will eliminate any interpretational doubts regarding this provision. Furthermore, the proposal is consistent with the written explanations provided by the European Commission (doc. WK 879/2026 ADD 4).</p> <p>RO (Drafting suggestions): 4. In line with the LEADER approach and its bottom-up principles, Local Action Groups shall be able to support initiatives responding to locally identified needs and opportunities, including projects involving farmers, forest holders, entrepreneurs, civil society organisations and local communities, with the aim of fostering inclusive, sustainable and balanced rural development.</p> <p>RO (Comments): The provisions of Article 18(4) place almost exclusive emphasis on the economic sector and on supporting farmers and foresters, which may lead to restrictive interpretations regarding the application of the LEADER approach, thereby risking to undermine its “bottom-up” character. Considering the LEADER principles established at European level, it is essential that LEADER retains its multi-sectoral character, allowing Local Action Groups (LAGs) to support projects tailored to local needs — including social, educational, cultural or community initiatives. In this regard, we consider it necessary to complement or reformulate the current provisions so that they clearly reflect that LEADER can support a broad range of local interventions, in the spirit of active participation of the local population in the planning, decision-making and implementation of local development strategies.</p> <p>SE (Drafting suggestions): 4. Support provided from LEADER shall be focused on rural development fields with added value for farmers or and forest holders, which may include such as social, environmental, digital and economic transformation of rural areas, improvement of well-being of rural citizens, and strengthening social capital</p> <p>SE (Comments):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	Sweden would like the provisions on Leader to be as flexible as possible for the Member states in terms of implementation, beneficiaries, extent and structure.
<p>Article 19 Support for knowledge sharing and innovation in agriculture, forestry and rural areas</p>	<p>BE (Drafting suggestions): New additional article: <u>Article 22a. – Advances:</u> <u>Members States may decide to pay advances of up to 50% under the interventions referred to in Articles 13,18 and 19 of this Regulation.</u></p> <p>BE (Comments): Article 44 of the current horizontal CAP regulation (regulation (EU) 2021/2116) contains specific provisions allowing Member States to pay advances to beneficiaries of the CAP-SP interventions. Such provisions should also be included in the CAP-regulation for the 2028-2034 period as a general article in block 6. We propose to add the following article in block 6: <u>‘Article 22a. – Advances:</u> <u>Members States may decide to pay advances of up to 50% under the interventions referred to in Articles 13,18 and 19 of this Regulation.’</u></p> <p>FI (Drafting suggestions): Support for knowledge sharing and innovation in agriculture, forestry and rural areas</p> <p>FI (Comments): Should we focus in CAP on agriculture and rural areas?</p> <p>IE (Drafting suggestions): Article 19 Support for <u>co-operation</u>, knowledge sharing and innovation in agriculture, forestry and rural areas</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>LT (Drafting suggestions): 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>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:</p>	<p>BE (Drafting suggestions): 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 <u>by at least one of the following actions:</u></p> <p>BE (Comments): It should not be obligatory to give support to all the types of actions, but to at least one of the mentioned actions. MS should have flexibility and to be able to finance actions with national/regional budget only.</p> <p>DK (Drafting suggestions): 1. Member States shall may provide support for knowledge sharing and innovation in agriculture, forestry and rural areas under the conditions laid down in this Article. Member States shall may provide support:</p> <p>DK (Comments): DK: It should be voluntary for Member States whether they want to implement interventions under Article 19, i.e., support for knowledge sharing and innovation in agriculture, forestry and rural areas. Some Member States already have schemes for knowledge sharing and innovation in agriculture, forestry and rural areas, but with national funding. It should therefore not be mandatory to also establish a scheme in the NRP plan, if nationally funded interventions are implemented. Furthermore, it should be voluntary for Member States if they want to provide support to operational groups and their projects under the EIP AGRI in the NRP plan.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>FI (Drafting suggestions): Member States shall provide support for knowledge sharing and innovation in agriculture, forestry and rural areas and interrelated fields under the conditions laid down in this Article. Member States shall provide support:</p> <p>FI (Comments): Should we talk here mainly about agriculture and rural areas, and mention other fields? In CAP focus is on agriculture and rural areas and support for forestry should be voluntary.</p> <p>IE (Drafting suggestions): 1. Member States shall provide support for co-operation, knowledge sharing and innovation in agriculture, forestry and rural areas under the conditions laid down in this Article. Member States shall provide support: Support under this article may be provided to:</p> <p>PL (Drafting suggestions): 1. Member States shall provide support for knowledge sharing and innovation in agriculture, and if relevant in forestry and rural areas, under the conditions laid down in this Article.</p> <p>PL (Comments): Support for knowledge sharing and innovation shall be directed according to existing needs and taking into account limited resources. Therefore only providing support for knowledge sharing and innovation in agriculture should be obligatory.</p> <p>SE (Drafting suggestions): 1. Member States shall provide support for knowledge sharing and innovation in agriculture, and may provide [such] [Option 1] support [for knowledge and innovation sharing] [Option 2] in forestry and rural areas, under the conditions laid down in this Article.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>SE (Comments): Sweden would prefer support to other beneficiaries than farmers to be voluntary.</p>
<p>(a) to prepare and implement the projects of the EIP-AGRI operational groups as well as actions to ensure broader uptake of projects' results;</p>	<p>IE (Drafting suggestions): (a) to prepare and implement the projects of the EIP-AGRI operational groups as well as actions to ensure broader uptake of projects' results;</p>
<p>(b) for actions to promote innovation, training and advice, skills development, advisory services and other forms of knowledge sharing and dissemination of information.</p>	<p>IE (Drafting suggestions): (b) for prepare and support actions to promote innovation, training and advice, skills development, advisory services and other forms of knowledge sharing and dissemination of information.</p> <p>LV (Drafting suggestions): (b) for actions to promote innovation, training and advice, skills development, advisory services and other forms of knowledge sharing and dissemination of information.</p> <p>LV (Comments): Repetition, advisory services already listed. Additionally, below is a reference to advisory services that comply with Article 20(3).</p> <p>PL (Drafting suggestions): (b) for actions to promote innovation; (c) training and advice, skills development, advisory services and other forms of knowledge sharing and dissemination of information.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>PL (Comments): Current wording indicates that support is provided for promotion of training and advice. It seems that this was not the intention of this provision.</p> <p>RO (Drafting suggestions): (b) for actions to promote innovation, training and advice, skills development, advisory services and other forms of knowledge sharing and dissemination of information, <u>as well as for the preparation and implementation of training, advisory and skills development actions.</u></p>
<p>Support for advisory services shall only be granted for those advisory services that comply with Article 20(3).</p>	<p>IE (Drafting suggestions): <u>(c) support for co-operation as referred to in Article 16 (g) and (h)</u></p>
<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>FI (Drafting suggestions): 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 <u>ARKIS</u>.</p> <p>FI (Comments): It would be justified to talk about ARKIS (Agricultural and Rural Knowledge and Innovation System) as rural areas and rural development play an important role in the CAP.</p> <p>IE (Drafting suggestions): 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. <u>Where relevant, R</u>results from its work shall be disseminated and multiplied <u>promoted</u> through the AKIS <u>and the CAP network.</u></p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>LT (Drafting suggestions):</p> <p>It is proposed that the dissemination of results through AKIS be mandatory, not merely recommended. Proposed amendment:</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 and the CAP networks”.</p> <p>LV (Comments):</p> <p>Why here is used “EIP-AGRI” and not “EIP-AGRI operational groups” as in other paragraphs? Are EIP-AGRI contact points still in force?</p>
<p>The EIP-AGRI shall:</p>	<p>LV (Comments):</p> <p>Why here is used “EIP-AGRI” and not “EIP-AGRI operational groups” as in other paragraphs?</p>
<p>(a) support cooperation projects for innovation through operational groups based on the ‘interactive innovation model’ referred to in paragraph 4;</p>	<p>BE (Drafting suggestions):</p> <p>(a) support cooperation projects for innovation through operational groups based on the ‘interactive innovation model’ referred to in paragraph 34;</p> <p>BE (Comments):</p> <p>Correction of reference</p> <p>LT (Drafting suggestions):</p> <p>A recurring technical inconsistency that needs to be corrected: the ‘interactive innovation model’ is presented not in paragraph 4, but in paragraph 3: „(a) support cooperation projects for innovation through operational groups based on the ‘interactive innovation model’ referred to in paragraph 4 3;“</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>(b) link research and farming and forestry practice and inform the scientific community of the needs of those practices;</p>	<p>AT (Drafting suggestions): b) link research, and farming and forestry practice and other rural actors and inform the scientific community of the needs of those practices;</p> <p>AT (Comments): Austria assumes that, within the framework of ‘rural areas’, knowledge exchange and innovation will not be limited to agricultural and forestry topics and target groups, but that other areas may also be included, as in the current CAP period 23-27 (see Art. 78). (3) CSP- Regulation). For the sake of clarity, we therefore propose that the actors and stakeholders in rural areas (‘rural actors’) be specifically mentioned in the list of tasks of EIP-AGRI in paragraph 2b.)</p> <p>SE (Drafting suggestions): (b) link research and farming and forestry practice and inform the scientific community of the needs of those practices;</p> <p>SE (Comments): The aim of paragraph 2 is broader than only farming and forestry which we would like to be reflected in subparagraph (b) as well. We see AKIS as a tool to enhance the effects of other support measures. A more inclusive subparagraph would, for instance, allow for a more effective usage of the “starter pack” for generational renewal outlined in the proposed basic regulation targeting also other areas than farming and forestry. For the same reasons we think article 20.3 (a) should be more inclusive as well.</p>
<p>(c) connect innovation actors and projects, particularly via the Union and national CAP networks;</p>	<p>LT (Drafting suggestions): It is proposed that connection be mandatory both through AKIS, as this is its function, and through the CAP networks. Proposed amendment:</p>

CY PCY suggestions	Drafting suggestions and Comments
<p>(d) promoting the use of innovative solutions through dissemination of information and knowledge, including farmer-to-farmer exchanges.</p>	<p>“connect innovation actors and projects, particularly via the AKIS, the Union and national CAP networks;”</p> <p>AT (Drafting suggestions):</p> <p>(d) promoting the use of innovative solutions through dissemination of information and knowledge, including farmer-to-farmer exchanges, where appropriate</p> <p>AT (Comments):</p> <p>For EIP operational groups that do not focus solely on agriculture (see above), the obligation to engage in farmer-to-farmer exchanges is inappropriate and should therefore not be mandatory</p> <p>BE (Drafting suggestions):</p> <p>(d) promoting the use of innovative solutions through dissemination of information and knowledge, including farmer-to-farmer exchanges.</p> <p>BE (Comments):</p> <p>Correction of typing error</p> <p>FR (Drafting suggestions):</p> <p><u>(e) foster the adoption of innovative solutions at farm level, through on-farm experimentation and trials</u></p> <p>FR (Comments):</p> <p>L'adoption de l'innovation est largement reconnue comme un angle mort des politiques. Les agriculteurs sont désireux d'adopter des innovations, mais ils préfèrent en voir les avantages évidents avant de prendre des risques, et l'adoption se fait généralement de manière progressive. Le PEI-AGRI devrait aborder cette question par le biais de nouveaux mécanismes visant à encourager la prise de risques à des fins d'innovation.</p> <p>EN : The adoption of innovation is widely recognized as a blind spot in policy.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>Farmers are eager to adopt innovations, but they prefer to see clear benefits before taking risks, and adoption is generally gradual. The EIP-AGRI should address this issue through new mechanisms designed to encourage risk-taking for innovation.</p> <p>SE (Drafting suggestions):</p> <p>(d) promoting the use of innovative solutions through dissemination of information and knowledge, which may include farmer-to-farmer exchanges.</p> <p>SE (Comments):</p> <p>We think it should be clarified that “farmer-to-farmer exchanges” is an example and not an obligation.</p>
<p>3. The projects implemented by the EIP-AGRI operational groups shall be based on the ‘interactive innovation model’ that complies with the following principles:</p>	
<p>(a) develop innovative solutions focusing on the specific needs of farmers, forester<u>forest</u> holders and rural actors;</p>	<p>FI (Drafting suggestions):</p> <p>develop innovative solutions focusing on the specific needs of farmers and forester<u>forest</u> holders rural actors.</p> <p>FI (Comments):</p> <p>Should we focus in CAP on agriculture and rural areas? Interrelated fields might include forest holders.</p> <p>LT (Comments):</p> <p>An explanation is needed of what ‘rural actors’ are and how this concept correlates with Article 4(3)(c) of the NRPP Regulation.</p> <p>SE (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>(a) test, prepare or develop innovative solutions focusing on the specific needs of farmers, forester holders and or rural actors;</p> <p>SE (Comments): We would like to clarify that the two-stage procedure allowed for in the current legislative framework will still be possible in the next reform.</p> <p>In both the Rural Development Programme and the CAP Strategic Plan, we have provided support for operational groups in two steps or levels. Both of them are important to promoting innovation.</p> <p>The first level aims to provide incentives to form an operational group around an idea, to establish a cooperation that most likely could not start without the support and, to some extent, also test if the idea has potential to become an innovation. This first step is not mandatory, but it is often the first step for smaller innovation projects and makes it easier for those without prior project knowledge or experience to go from just an idea to developing an innovation.</p> <p>The next step/level is to form the innovation project itself. Here, the aim is that by the end of the project the innovation should have the potential to be more or less ready for the market.</p> <p>Furthermore, Sweden would prefer support to other beneficiaries than farmers to be voluntary.</p>
<p>(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;</p>	<p>SE (Drafting suggestions): (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.</p> <p>SE (Comments):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>The wording “ensuring the potential for scale up” could hinder the first step/level of operational groups mentioned above. We believe that the potential of scaling up is relevant to assess but there are also other criteria important to fostering innovation. We would prefer a deletion of this part of the sentence. As a compromise, we could accept “<u>including an assessment of the potential for a scale up</u>” replacing “including ensuring the potential for scale up”.</p>
<p>(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.</p>	<p>LT (Drafting suggestions): It is important to emphasize that actors take responsibility not only in planning and designing project activities, but also in implementing them properly. For this reason, it is proposed to supplement the provision with the term "co-managed". Proposed amendment: “the projects are co-created, and co-decided and co-managed among the actors involved in the projects and implemented in a consultative manner, including ensuring the potential for scale up.”</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. 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>LT (Drafting suggestions): AKIS should be explicitly mentioned as a key platform for the dissemination of information, alongside the CAP networks, reflecting its core purpose. Proposed amendment: “Member States shall ensure that the key results of the projects referred to in this paragraph are disseminated through practice-oriented channels, including the AKIS, 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>4. Member States may grant support for projects of EIP-AGRI operational groups under the following conditions:</p>	

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
(a) support may only be granted on the basis of an approved project plan that is based on the principles referred to <i>in</i> paragraph 3;	
(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.	
5. Member States shall not provide support under this Article to knowledge sharing and innovation involving research bodies only.	<p>SE (Drafting suggestions):</p> <p>5. Member States shall not provide support under this Article to knowledge sharing and innovation involving research bodies only; except for the purpose of disseminating information and knowledge to farmers.</p> <p>SE (Comments):</p> <p>From our experience, research bodies can play an important part in the dissemination of information and knowledge to farmers (mentioned in article 20.2 (d)) and we think that the legislative framework should not prevent Member States to support such work where appropriate.</p>
Article 20 Agricultural knowledge and innovation systems and farm advisory services	<p>AT (Drafting suggestions):</p> <p>Agricultural and rural knowledge and innovation systems and farm advisory services</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>AT (Comments): In Austria and also expressed from the European Commission representative on this issue, in addition to a clear agricultural focus, stakeholders in rural areas have always been taken into account in AKIS. To reflect this, we propose further developing AKIS into ARKIS – ‘Agricultural and Rural Knowledge and Innovation System’]</p> <p>LT (Drafting suggestions): 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>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 innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p>	<p>DE (Drafting suggestions): 1. Each Member State shall ensure that farmers and forest holders have access, wherever possible, to information concerning innovations and that new knowledge reaches them in a timely and effective manner, enabling providing them with an opportunity to deploy innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p> <p>DE (Comments): It is not in the gift of the Member States to provide access to any and all innovation. Often innovation will be subject to intellectual property rights, copyright, patents, etc. The text must account for these realities.</p> <p>EE (Drafting suggestions): 1. Each Member State shall ensure that farmers, forest holders, and where relevant, actors of the food chain, have access to innovation and that new knowledge reaches them in a timely and effective manner, enabling them to deploy innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>EE (Comments): Including “actors of the food chain” ensures coherence with Article 19(b), which explicitly requires involving relevant food-chain partners alongside farmers, researchers and academia. Since innovation in agriculture often depends on downstream collaboration (e.g., processors, distributors, retailers) for uptake and market deployment, these actors must also receive timely knowledge to enable effective implementation and scaling of innovative solutions.</p> <p>FI (Drafting suggestions): 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 innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p> <p>FI (Comments): On the one hand, the target group should be broadened to rural communities and enterprises, but the inclusion of forest holders should be left to the discretion of the Member States.</p> <p>IE (Drafting suggestions): 1. Each Member State shall ensure that farmers, and where relevant forest holders, have access to innovation and that new knowledge reaches them in a timely and effective manner, enabling them to deploy innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p> <p>LV (Drafting suggestions): 1. Each Member State shall ensure that farmers and forest holders have access to innovation and that new knowledge reaches them <i>in a timely and effective manner</i>, enabling them to deploy innovative and sustainable solutions <i>effectively</i> and profit from up-to-date knowledge in the agricultural sector.</p> <p>LV (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>The main argument against the use of such words in regulatory acts is their subjectivity and uncertainty, which contradicts the principle of legal certainty. Interpretation risks: What seems "timely" to one person may seem too late to another. A regulatory act must be clear and predictable. "Effectiveness" is a concept of proportionality and efficiency, not a strict legal fact.</p> <p>PL (Drafting suggestions):</p> <p>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 innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p> <p>PL (Comments):</p> <p>It is not clear what is meant by “timely and effective” access to innovation and how to measure timeliness and effectiveness.</p> <p>SE (Drafting suggestions):</p> <p>1. Each Member State shall ensure that farmers and forest holders benefiting from support under this Regulation have access to innovation and that new knowledge reaches them in a timely and effective manner, enabling them to deploy innovative and sustainable solutions effectively and profit from up-to-date knowledge in the agricultural sector.</p> <p>SE (Comments):</p> <p>We think it should be clarified that the requirement to provide access to knowledge and innovation only concerns beneficiaries under this Regulation (e.g. the requirement shouldn’t apply if a Member State choses not to provide CAP support to the forestry sector). By using “benefiting from support” we hope support benefiting farmers and forest holders but given to providers of advisory services will also be covered.</p>
<p>2. To meet the requirement laid down in paragraph 1, each Member State shall establish in</p>	<p>AT (Drafting suggestions):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>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>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 and Rural Knowledge and Innovation System (the ARKIS). The ARKIS shall include</p> <p>AT (Comments): See above]</p> <p>BE (Drafting suggestions):</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 and forest holders, in particular through the Agricultural Knowledge and Innovation System (the AKIS). The AKIS shall include:</p> <p>BE (Comments): <i>“in particular”</i> would mean that ways other than the AKIS would be possible to meet the requirement laid down in §1. We consider that AKIS includes all elements necessary to meet the requirement of paragraph 1. Proposition to add “forest holders” for coherence with § 1.</p> <p>FI (Drafting suggestions): 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 ARKIS). The ARKIS shall include:</p> <p>FI (Comments): It would be justified to talk about ARKIS (Agricultural and Rural Knowledge and Innovation System) as rural areas and rural development play an important role in the CAP.</p> <p>IE (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>2.To meet the requirement laid down in paragraph 1, each Member State shall establish describe in the NRP Plan how innovations and up-to-date knowledge will reach farmers, in particular through the Agricultural Knowledge and Innovation System (the AKIS). The AKIS description shall include an overview of how the Member State establishes:</p> <p>IT (Drafting suggestions):</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, to the greatest extent possible, the following components:</p> <p>IT (Comments):</p> <p>Member States need some degree of flexibility.</p> <p>LT (Comments):</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>LT (Drafting suggestions):</p> <p>It is considered that the interaction between AKIS and national CAP networks should be mentioned. Proposed amendment: „arrangements to ensure effective knowledge flows and synergies between advisors, researchers, practitioners, the AKIS, national CAP networks and other relevant stakeholders;”</p> <p>LV (Drafting suggestions):</p> <p>(a) arrangements to ensure <i>effective</i> knowledge flows and synergies between advisors, researchers, practitioners, national CAP networks and other relevant stakeholders;</p> <p>LV (Comments):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>The main argument against the use of such words in regulatory acts is their subjectivity and uncertainty, which contradicts the principle of legal certainty. "Effectiveness" is a concept of proportionality and efficiency, not a strict legal fact.</p>
<p>(b) actions to improve access for farmers and forest holders to impartial and qualified advice;</p>	<p>BE (Drafting suggestions): (b) actions to improve access for farmers and forest holders to impartial and qualified advice as referred to in paragraph 5;</p> <p>BE (Comments): Advice of good quality should be ensured by advisors that are suitably qualified, appropriately trained and having no conflict of interest. As amended in the row of paragraph 4, we propose to remove the last sentence of paragraph 4 to a new paragraph 5 in line with paragraph 3 of art. 15 of the current CAP Strategic Plan regulation (regulation (EU) 2021/2115): <i>'Member States shall ensure that the advice given is impartial and that advisors are suitably qualified, appropriately trained and have no conflict of interest.'</i></p> <p>FI (Drafting suggestions): (b) actions to improve access for farmers, and if a Member State chooses for rural communities, and rural enterprises and forest holders, to impartial and qualified advice;</p> <p>FI (Comments): Flexibility is needed for MS to accommodate advisory services according to its needs.</p>
<p>(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)19(3);</p>	<p>DE (Drafting suggestions): (c) support for innovation as a part of the farm advisory services, particularly support, where appropriate and relevant, 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)19(3);</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>DE (Comments): We reject any call for the unqualified, blanket support of any and all operational groups. Any support must be conditional upon the appropriateness, relevance and quality of the work of any given operational group.</p>
<p>(d) a plan to improve dissemination and demonstration of research outcomes and innovative and sustainable solutions to farmers, forester<u>forest</u> holders and other end-users at a large scale;</p>	<p>BE (Drafting suggestions): (d) arrangements a plan to improve dissemination and demonstration of research outcomes and innovative and sustainable solutions to farmers, forester<u>forest</u> holders and other end-users at a large scale;</p> <p>BE (Comments): It is not necessary to include a plan in a strategy. The proposed wording is in line with the wording used in point (a).</p> <p>FI (Drafting suggestions): a plan to improve dissemination and demonstration of research outcomes and innovative and sustainable solutions to farmers, rural actors forester<u>forest</u> holders and other end-users at a large scale;</p> <p>FI (Comments): Should we focus in CAP on agriculture and rural areas? Interrelated fields might include forest holders.</p> <p>PL (Drafting suggestions): (d) a plan to improve dissemination and demonstration of research outcomes and innovative and sustainable solutions to farmers, and if relevant forester<u>forest</u> holders and other end-users at a large scale;</p> <p>PL (Comments): The plan should be adapted to relevant needs.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<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 national initiatives and other relevant measures set out in the NRP Plan;</p>	<p>AT (Drafting suggestions): (e) interventions set out in the NRP Plan supporting ARKIS operation, in particular those referred to in Article 19, and their complementarity and coherence with relevant national initiatives and other relevant measures set out in the NRP Plan</p> <p>AT (Comments): See above]</p> <p>FI (Drafting suggestions): interventions set out in the NRP Plan supporting ARKIS operation, in particular those referred to in Article 19, and their complementarity and coherence with relevant national initiatives and other relevant measures set out in the NRP Plan;</p> <p>FI (Comments): It would be justified to talk about ARKIS (Agricultural and Rural Knowledge and Innovation System) as rural areas and rural development play an important role in the CAP.</p>
<p>(f) a system for provision of farm advisory services, established in accordance with paragraph 3.</p>	
<p>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:</p>	<p>AT (Drafting suggestions): As part of the ARKIS, 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</p> <p>AT (Comments): See above]</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>DE (Drafting suggestions): The farm advisory services shall cover all the following elements, where relevant:</p> <p>DE (Comments): For example, paragraph 3(b) of the Article refers to the strengthening of successful generational renewal. However, individual federal states in Germany do not have a need for additional measures due to the already successful enhancement transfer of agricultural businesses. A mandatory provision would result in additional administrative burden, increased costs, and greater bureaucratization without need.</p> <p>DK (Drafting suggestions): 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. Member States may build upon existing systems. The farm advisory services shall cover all the following elements, where relevant:</p> <p>DK (Comments): DK: It is important that there is no requirement to establish a new system for provision of farm advisory services, if there is already a well-functioning system in the Member State. This should be stated in Article 20. It should also be stated that Member States may build upon existing systems, as stated in the present regulation (EU) 2021/2115, article 15 (1). Furthermore, the advisory service should only cover relevant elements. These can differ from Member State to Member State.</p> <p>FI (Drafting suggestions): As part of the <u>AR</u>KIS, 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:</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>FI (Comments): It would be justified to talk about ARKIS (Agricultural and Rural Knowledge and Innovation System) as rural areas and rural development play an important role in the CAP.</p> <p>LT (Drafting suggestions): 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.</p>
<p>(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 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;</p>	<p>BE (Drafting suggestions): (a) advice to farmers and forest holders on sustainable and resilient management of land, including soil and water, farms and forests tailored to farm types and different production systems, as well as on the requirements for support set out in the NRP 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 referral to social and mental health support services; and the use of innovations, data-driven solutions and digital tools;</p> <p>BE (Comments): The advisors don't have the necessary skills to provide advice related to social support and mental health issues but need to be able to refer to the relevant social and mental health support providers. Therefore we propose this amendment. Usually, an advisor notices mental health problems when he is at the farm for other types of advice.</p> <p>FI (Drafting suggestions): 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 Plans, including farm stewardship, setting-up and transfers of holdings and start-ups;</p> <p>FI (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>Focus should be on farmers. Flexibility is needed for MS to accommodate advisory services according to its needs. Inclusion of forest holders should be left to the discretion of the Member States.</p> <p>IE (Drafting suggestions):</p> <p>(a) advice to farmers and, where relevant, 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 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;</p> <p>LT (Drafting suggestions):</p> <p>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. We also propose to remove the reference to advisory services on mental health, as this is not a sectoral need, but a need that is horizontal, which must be ensured for all EU citizens without exception, regardless of a specific sector or a specific policy area. It is considered that attention to mental health in the context of health protection should be very important horizontally and that health protection systems should be tasked with doing this, while ensuring the appropriate dissemination of this type of information to everyone, regardless of the specific sector. For these reasons, the following corrections are proposed: “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 Plans, including farm stewardship, setting-up and transfers of holdings and start-ups; business management, digital skills, bioeconomy innovations, social well-being, 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”</p> <p>PL (Drafting suggestions):</p> <p>(a) advice to farmers and forest holders (if relevant) 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 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;</p> <p>(c) Advisory services for farmers can include advice on start-ups; business management and the use of innovations, data-driven solutions and digital tools;</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>(d) access to information about bodies responsible for social support or services for people in mental crisis.</p> <p>PL (Comments): The mandatory provision of start-up support services within agricultural advisory services raises concerns, as such services should be available to entities from all sectors and provided by appropriate institutions. To what extent does the European Commission plan to support start-ups, the use of digital solutions within agricultural advisory services? Current wording indicates that support for access to social services, raising awareness of mental health issues, and the availability of services should be provided by farm advisory services. Since there are institutions responsible for these areas we propose to change current wording.</p> <p>SE (Drafting suggestions): (a) advice to farmers and, where relevant, forest holders and other rural actors 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 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;</p> <p>SE (Comments): For the same reasons outlined for 19.2, we believe the scope of the advisory services should be broadened. It would be preferable not to specify the topics to be included in the advisory services as the needs and administrative setups in Member States differ. From a Swedish perspective, we find it particularly difficult to see the added value of including “social support”.</p>
<p>(b) targeted advice for young farmers, in particular as regards business management, access to finance, access to</p>	<p>BE (Drafting suggestions):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>public support, access to knowledge and innovation.</p>	<p>b) targeted advice for young farmers and new farmers, in particular as regards business management, access to finance, access to public support, access to knowledge and innovation.</p> <p>BE (Comments): It's also important to support farmers who are not young farmers but who are new to the sector.</p>
<p>4. Member States shall ensure that farmers and forester<u>forest</u> 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.</p>	<p>BE (Drafting suggestions):</p> <p>4. Member States shall ensure that farmers and forester<u>forest</u> holders have direct access to advisers, such as by providing public databases of advisers.</p> <p>5. Member States shall ensure that the advice provided to farmers and forest holders is impartial, and that advisers are suitably qualified, appropriately trained and free from conflict of interest.</p> <p>BE (Comments): Proposal to bring the last sentence to a new paragraph 5 and to bring the text in line with art. 15(3) of the current Regulation (EU) 2021/2115 that provides that advice of good quality should be ensured by advisers that are suitably qualified, <u>appropriately trained</u> an having no conflict of interest.</p> <p>DE (Drafting suggestions):</p> <p>4. Member States shall ensure promote conditions that support farmers and forester<u>forest</u> holders have direct access to advisers, such as by providing public databases of advisers, if relevant on a regional basis. 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.</p> <p>DE (Comments): It is not in the gift of the Member States to “ensure” access. Member States can take measures to ease or simplify access, but access is determined by countless variables, many of which are beyond the direct control of the Member States.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>According to the German constitution (Grundgesetz), the organisation of AKIS and the farm advisory system is in the responsibility of the federal states. The advisory services, structures and funding and financing modalities are correspondingly differentiated and adapted to the respective regional needs. (16 federal states = 16 systems) This shall be expressed by the additional clause “if relevant on a regional basis”, as this is the case for Germany.</p> <p>FI (Drafting suggestions):</p> <p>Member States shall ensure that farmers and rural actors foresterforest holders have direct access to advisers, such as by providing public databases of advisors. Member States shall ensure that the advice provided to farmers and forest holders is impartial, and that advisors are suitably qualified and free from conflict of interest.</p> <p>FI (Comments):</p> <p>Focus should be on farmers. Flexibility is needed for MS to accommodate advisory services according to its needs. Inclusion of forest holders should be left to the discretion of the Member States.</p> <p>FR (Drafting suggestions):</p> <p>Member States shall ensure that farmers and forest holders have direct access to advisers, such as by providing public databases of advisors, <u>-advisory structures or advisory structures’ networks</u>. Member States shall ensure that the advice provided to farmers and forest holders is impartial, and that advisors are suitably qualified and free from conflict of interest.</p> <p>FR (Comments):</p> <p>Le mode d’agrément choisi par la France dans le cadre du « Système de conseil agricole » (SCA), devenu en 2023 « Services de conseil agricole », porte sur un agrément de réseaux de structures de conseil et non de personnes physiques (=conseillers), dont la liste est publiée en ligne. La France souhaite que ce système puisse perdurer car un agrément de personnes physiques impliquerait de tenir un répertoire actualisé des conseillers individuels, lequel serait particulièrement lourd en gestion.</p> <p>EN : The accreditation system chosen by France under the “Agricultural Advisory System”, which became “Agricultural Advisory Services” in 2023, involves accrediting networks of advisory structures rather than individuals (=advisors), with the list of accredited structures published online. France would like this system to</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>continue, as accreditation of individuals would require maintaining an up-to-date directory of individual advisors, which would be particularly burdensome to manage.</p> <p>IE (Drafting suggestions):</p> <p>4. Member States shall ensure that farmers and, <u>where relevant</u>, forester<u>forest</u> 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.</p> <p>PL (Drafting suggestions):</p> <p>4. Member States shall ensure that farmers and forester forest 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. Member States may continue providing farm advisory services upon existing systems.</p> <p>PL (Comments):</p> <p>There is no need to establish new systems if they already exist. Possibility to continue upon existing systems should be included</p> <p>SE (Drafting suggestions):</p> <p>4. Member States shall ensure that farmers and forester holders benefiting from support under this Regulation have direct access to advisers, such as by providing public databases of advisers. Member States shall ensure that the a advice provided to farmers and forest holders under this Article is shall be impartial, and that advisors are suitably qualified and free from conflict of interest.</p> <p>SE (Comments):</p> <p>We think it should be clarified that the requirement to provide access to knowledge and innovation only concerns beneficiaries under this Regulation (e.g. the requirement shouldn't apply if a Member State choses not to provide CAP support to the forestry sector). By using "benefiting from support" we hope support benefiting farmers and forest holders but given to providers of advisory services will also be covered.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>Article 21 Authority in charge of data governance under the CAP</p>	<p>BE (Drafting suggestions):</p> <p style="text-align: center;">Article 21</p> <p><u>Once only principle and interoperability of CAP data Authority in charge of data governance under the CAP</u></p> <p>DE (Comments):</p> <p>We see the risk that through the creation of new reporting obligations, in addition to the existing obligations under the NRPP Regulation and the Performance Regulation, an additional bureaucratic effort is created, which in particular poses great challenges for federally organized Member States. In addition, any delegated and implementing acts must enter into force early enough to give the Member States sufficient time to implement the obligations arising from them.]</p> <p>DK (Comments):</p> <p>DK: We see the need and benefit of continuous improvement of MS data governance but it is unclear why it is a subject of the CAP-regulation. The scope of this article should be clarified in order to be able to carry out an impact assessment. This includes information on the overall purpose of interoperability, more details on the data concerned and shared standards for this data.</p> <p>LV (Comments):</p> <p>The system regarding data governance shall be simple as possible and it shall include only provision that are necessary to ensure principle “collect once use multiply times” as agreed in Omnibus II. This additional obligation shall fit together with Article 63(4) of the NRP Regulation on data collection, which already states that Member States shall establish digital data collection systems in an interoperable manner and based on the principle that data shall be collected only once.</p>
<p>1. Each Member State shall designate one authority responsible for taking or</p>	<p>BE (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
<p>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>1. <u>Member States shall take actions to prevent that farmers and other CAP beneficiaries are required to submit the same data more than once to public authorities for CAP purposes. For this purpose, Member States will therefore improve data interoperability between information systems used for the implementation, administration, monitoring and evaluation of the CAP. For the goal of this Article, interoperability means the ability of information systems to interact with each other by sharing data by means of electronic communication.</u></p> <p>2. <u>Paragraph 1 shall apply insofar as the data are:</u> <u>(i) relevant and proportionate for the intended CAP purpose, and</u> <u>(ii) accessible through information systems for which interoperability is feasible with reasonable efforts.</u></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>BE (Comments): The purpose of this Article is to operationalise the principle of “sharing once, reusing multiple times” in the implementation of the Common Agricultural Policy, with the aim of reducing administrative burden for farmers and other CAP beneficiaries. This approach is fully in line with the Council’s declaration of the Omnibus III. Interoperability to the benefits of the farmers relies on the ‘once only’ principle. The ‘once only’ principle means that citizens/businesses are not asked to provide data that is already known to another government. It is also important to emphasise the application of “once only” in this article in order to reduce the burden for authorities (automated exchange vs. retrieval work). In this way, Article 21 provides a legal basis for requesting access to data sources from other authorities. Establishing a data authority for the purpose of this article creates additional administrative burden without added value. Member States are already working on simplification and should continue to do so. Delegated and implementing regulations are not necessary in themselves, as it is up to the Member State to determine how the ‘once only’ principle is achieved in terms of measures and implementation.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>‘Interoperability’ is the ability of different autonomous organizations or systems to communicate and collaborate with each other. The four pillars of interoperability are technical, semantic, legal and organizational interoperability.</p> <p>Full interoperability is not necessary to apply the ‘once-only principle’, and we propose limiting interoperability to technical interoperability as was already provided as a condition from Article 21.</p> <p>To achieve cross-border interoperability of CAP data European guidelines are needed, such as the technical guidelines for INSPIRE harmonization of LPIS data.</p> <p>DK (Drafting suggestions):</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>DK (Comments):</p> <p>DK: The requirements and expectations for cross-border interoperability between MS information systems in particular needs to be described in more detail if it is to be included at this stage.</p> <p>FI (Drafting suggestions):</p> <p>1. Each Member State shall designate at the latest by 2032 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>FI (Comments):</p> <p>The new period is always a work-loaded time. That is why transitional period is needed.</p> <p>FR (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<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 <u>interventions listed in article 5(1), points (a) to (k) and (r)</u>, for the benefit of farmers and other CAP beneficiaries. <u>Accredited paying agencies may entrust these functions, as referred to in Article 52 of Regulation (EU) [...]</u> [NRP] <u>[functions of the paying agency]</u>.</p> <p>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>FR (Comments):</p> <p>Les autorités françaises souhaitent limiter le champ de cette obligation d’interopérabilité des systèmes d’information aux seuls bénéficiaires des mesures dans le champ réglementaire du ringfencing PAC. L’extension de cette obligation à des mesures telles que LEADER, la coopération, ou encore le PEI-Agri induirait une complexité de gestion disproportionnée.</p> <p>Il est souhaité que soit explicité dans ce paragraphe que les organismes payeurs peuvent assurer les fonctions de l’autorité de coordination de la gouvernance des données, afin d’éviter les charges administratives inhérentes à la création d’une nouvelle autorité.</p> <p>EN : The French authorities wish to limit the scope of this obligation for information systems to be interoperable to only those beneficiaries of measures within the regulatory scope of CAP ring-fencing. Extending this obligation to measures such as LEADER, cooperation, or PEI-Agri would lead to disproportionate management complexity.</p> <p>It is hoped that this paragraph will make it clear that paying agencies can perform the functions of the data governance coordination authority, in order to avoid the administrative burdens inherent in creating a new authority.</p> <p>HR (Drafting suggestions):</p> <p>Each Member State shall designate one authority responsible for taking or and 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>

CY PCY suggestions	Drafting suggestions and Comments
	<p>HR (Comments): The change proposed is for better clarity.</p> <p>IE (Drafting suggestions): 1. Each Member State shall designate one authority responsible for taking or coordinating actions to achieve and maintain national and, where appropriate, 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>IT (Drafting suggestions): 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. <u>For the purposes of this Article, ‘interoperability’ means the capacity of information systems to exchange, interpret and reuse data in a secure, reliable and automated manner through electronic communication.</u></p> <p>IT (Comments): Proposed amendment aim to both strengthen legal clarity and align the definition with the broader EU interoperability framework by explicitly referencing security, reliability and reusability of data, which are essential elements in modern digital governance.</p> <p>LV (Drafting suggestions): Each Member State may shall designate one authority responsible for taking or coordinating actions to achieve and maintain national and where possible 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</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>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>LV (Comments): Latvia supports the principle that farmers should only have to submit data once. Latvia is already implementing this approach step by step and we believe that it is not necessary to designate a separate authority for this purpose. This can be done by the Member State within its own administrative structure. Therefore Article 21 shall be optional for Member States.</p> <p>LU (Drafting suggestions): 1. Each Member State shall may 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>LU (Comments): It should be optional for the MS to designate an authority for taking coordinating actions. Every MS has his specific organisation when it comes to data management.</p> <p>SE (Drafting suggestions): 1. Each Member State shall designate one authority responsible for taking or coordinating actions to gradually 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>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>2. The designated authority shall have in particular the following tasks:</p>	<p>BE (Drafting suggestions): 2. The designated authority shall have in particular the following tasks:- LU (Drafting suggestions): The designated authority shall may have in particular the following tasks: LU (Comments): The definition of tasks should stay within the responsibility of the MS and be optional to share their data governance policy with the Commission.</p>
<p>(a) drawing up and submitting to the Commission a Roadmap at the level of the Member State to achieve and maintain interoperability (hereinafter the ‘Roadmap’) and follow up of Commission observations on the Roadmap;</p>	<p>BE (Drafting suggestions): (a) drawing up and submitting to the Commission a Roadmap at the level of the Member State to achieve and maintain interoperability (hereinafter the ‘Roadmap’) and follow up of Commission observations on the Roadmap;- FI (Drafting suggestions): 2 (a) drawing up and submitting to the Commission an indicative Roadmap at the level of the Member State to achieve and maintain interoperability (hereinafter the ‘Roadmap’) and follow up of Commission observations on the Roadmap; FI (Comments): The roadmap should be indicative in accordance with the principle of simplification and in order to reduce the administrative burden. LU (Drafting suggestions): (a) drawing up and submitting to the Commission a Roadmap at the level of the Member State to achieve and maintain interoperability (hereinafter the ‘Roadmap’) and follow up of Commission observations on the Roadmap;-</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>LU (Comments): The roadmap is in the responsibility of the MS and COM has only to take note of it. The roadmaps should therefore be purely informative. There is no need for observations that are not binding. Besides this it is a simplification for the COM. No time lost on writing observations that are not binding.</p> <p>SE (Drafting suggestions): a) drawing up and submitting to the Commission a Roadmap at the level of the Member State to gradually achieve and maintain interoperability (hereinafter the ‘Roadmap’) and follow up of Commission observations on the Roadmap;</p> <p>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>
<p>(b) coordination of the implementation, or, as decided by the Member State, implementation of the Roadmap in an efficient, effective and timely way.</p>	<p>BE (Drafting suggestions): (b) — coordination of the implementation, or, as decided by the Member State, implementation of the Roadmap in an efficient, effective and timely way.</p> <p>IT (Drafting suggestions): (b) coordination of the implementation, or, as decided by the Member State, implementation of the Roadmap in an efficient, effective and timely way. (c) <u>ensuring coordination with other national authorities involved in agricultural data management, including paying agencies, certification bodies and environmental authorities;</u> (d) <u>ensuring compliance with Union-level standards for cybersecurity, data protection and interoperability.</u></p> <p>IT (Comments):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>Interoperability requires the cooperation of multiple authorities and must be aligned with cybersecurity and data protection standards applicable at EU level. The amendment ensures that the designated authority is explicitly responsible for coordination and compliance.</p>
<p>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].</p>	<p>BE (Drafting suggestions): 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].</p> <p>HR (Drafting suggestions): The Member States shall notify the Commission of the designation of the authority from paragraph 1 at the latest by [OPOCE: [within three months from the entry into force of this Regulation].</p> <p>HR (Comments): Reference to paragraph 1 added</p> <p>LU (Drafting suggestions): The Member States shall notify the Commission of their decision on implementing paragraph one and 2 at the latest by [OPOCE: [within three months from the entry into force of this Regulation] or by the 16 December of the year of implementation together with their roadmap.</p> <p>LU (Comments): It should be up the MS to define the pace of implementation of the article.</p> <p>SE (Drafting suggestions): The Member States shall notify the Commission of the designation of the authority at the latest by [OPOCE: [within three six months from the entry into force of this Regulation].</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>
<p>3. The Roadmap referred to in paragraph 2 shall cover:</p>	<p>BE (Drafting suggestions): 3. — The Roadmap referred to in paragraph 2 shall cover:</p>
<p>(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;</p>	<p>BE (Drafting suggestions): (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;</p> <p>LV (Drafting suggestions): (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;</p> <p>LV (Comments): The approach should be simplified - roadmap shall include only needs and actions in particular timeframe. Otherwise, the additional regulation/guidelines on how to set milestones and targets will be needed. The system should be flexible so that if the targets change, the entire roadmap does not have to be revised.</p> <p>SE (Drafting suggestions): (a) identification of needs to <u>gradually</u> achieve and maintain interoperability as referred to in paragraph 1, and design of measures to address them as well as timeframe with <u>milestones and</u> targets for their implementation;</p> <p>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>(b) identification of possible synergies with other Union and national interoperability initiatives.</p>	<p>BE (Drafting suggestions): (b) — identification of possible synergies with other Union and national interoperability initiatives.</p> <p>FR (Drafting suggestions): (b) — identification of possible synergies with other Union and national interoperability initiatives.</p> <p>FR (Comments): Cette obligation supplémentaire semble à la fois peu précise, et le périmètre de la feuille de route prévue au (a) est déjà très ambitieux pour un déploiement lors de cette première programmation. EN : This additional obligation seems vague, and the scope of the roadmap set out in (a) is already very ambitious for deployment during this initial programming period.</p>
<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>BE (Drafting suggestions): 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>IE (Comments): This needs to be implemented strictly in adherence with Article 5(1)(b) of the GDPR which requires that personal data is: "collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation'). There is the potential for misunderstanding that this overrides our GDPR obligations.</p> <p>IT (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<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><u>The Roadmap shall describe the concrete measures by which the Member State will ensure the application of the once-only principle, including cooperation with other relevant national databases</u></p> <p>IT (Comments):</p> <p>The original text refers to the once-only principle but does not require concrete implementation measures. This ensures practical application and improves measurability and monitoring by the Commission.</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>BE (Drafting suggestions):</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>FI (Drafting suggestions):</p> <p>For the elements referred to in the first subparagraph, point (a), the Member State shall may consider in particular the need to establish a single digital identity framework and shall may consider alignment with Regulation (EU) No 910/2014, including as regards the European Digital Identity Wallet for natural and legal persons</p> <p>FI (Comments):</p> <p>The wording is not juridical text. Words “shall”, “consider” and “in particular” are indicatives of voluntary approach. Thus, word may should be used.</p> <p>FR (Drafting suggestions):</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>

CY PCY suggestions	Drafting suggestions and Comments
	<p><u>3 bis. No specific sanction shall apply in case a Member State does not respect the deadlines for appointing the competent body or for not reporting progress on implementation of the roadmap. However, the Commission may issue observations based on the submitted roadmap. Member States are expected to take these observations into consideration when submitting an amended version of their Roadmap. The designated authority is not subject to the conformity procedure and does not constitute a basic Union requirement under CAP rules.</u></p> <p>FR (Comments): Le cadre d'identité numérique unique doit faire l'objet d'explications complémentaires de la part de la Commission avant de pouvoir être accepté par les Etats membres. L'ajout d'un 3bis vise à inscrire explicitement dans le règlement les réponses de la Commission relatives à l'absence de sanction si la feuille de route n'est pas complètement mise en œuvre (réponse V.51 du document WK 879/2026 ADD 4). EN : The single digital identity framework must be further explained by the Commission before it can be accepted by Member States. The addition of a 3a aims to explicitly include in the regulation the Commission's responses regarding the absence of penalties if the roadmap is not fully implemented (response V.51 of document WK 879/2026 ADD 4).</p> <p>LV (Drafting suggestions): <u>To the extent possible,</u> for the elements referred to in the first subparagraph, point (a), the Member State <u>may shall</u> consider in particular the need to establish a single digital identity framework and <u>shall</u> 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>BE (Drafting suggestions): 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>FI (Drafting suggestions):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<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>FI (Comments): Reporting requirements should be abolished in order to reduce the administrative burden</p> <p>FR (Drafting suggestions): The Member States shall submit to the Commission by 16 December of each calendar year an annual a 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 <u>twice during the program: one at mid-term and the other one at the end of the program.</u></p> <p>FR (Comments): Le rythme de soumission annuelle d'un rapport de mise en œuvre de la feuille de route est trop important et génèrerait une charge administrative disproportionnée. Il est proposé deux fois par programmation : une à mi-parcours et une à la fin de la programmation EN : The annual submission of a roadmap implementation report is too frequent and would generate a disproportionate administrative burden. It is proposed that reports be submitted twice per programming period: once at mid-term and once at the end of the programming period.</p> <p>IT (Drafting suggestions): 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>IT (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>In order to avoid not necessary red-tape for both Ms and EC, such information covered by proposed annual report could be a point in agenda – in “Any other Business” - within the 2028-2034 Plan Monitoring Committee, CAP section.</p> <p>LV (Drafting suggestions):</p> <p>4. The Member States shall submit to the Commission by 16 December of each every second calendar year an annual a 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>LV (Comments):</p> <p>Why specifically December 16?</p> <p>LU (Drafting suggestions):</p> <p>The Member States shall submit to the Commission by 16 December every 2 years-after the decision in paragraph 2-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>LU (Comments):</p> <p>In order to reduce administrative burden both for MS and Commission, the reports should be done only every 2 years. The pace of progress of digitalisation projects take time.</p> <p>SE (Drafting suggestions):</p> <p>4. The Member States shall submit to the Commission by 16 December of each calendar year an biannual report on brief update 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>SE (Comments):</p> <p>Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the annual reports.</p>	<p>BE (Drafting suggestions): Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the annual reports.</p> <p>FI (Drafting suggestions): Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the annual reports.</p> <p>FR (Drafting suggestions): Where necessary, Member States shall submit to the Commission amendments of the Roadmaps. together with the annual reports.</p> <p>FR (Comments): Modification liée à la suppression du rapport annuel proposée ci-dessus.</p> <p>EN : Amendment related to the proposed elimination of the annual report above.</p> <p>IT (Drafting suggestions): Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the annual reports.</p> <p>IT (Comments): See above for explanation.</p> <p>LV (Drafting suggestions): Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the annual reports.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>LV (Comments): No need to link amendments with reports. This gives more flexibility.</p> <p>LU (Drafting suggestions): Where necessary, Member States shall submit to the Commission amendments of the Roadmaps together with the biannual reports.</p> <p>SE (Drafting suggestions): Where necessary, Member States shall submit to the Commission strategic amendments of the Roadmaps together with the biannual update reports.</p> <p>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>
<p>Member States shall submit the first annual report to the Commission by 16 December 2029.</p>	<p>BE (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029.</p> <p>DK (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029. Implementation of the road map and data interoperability are not part of the key requirements for the Member State’s management, control and audit systems in Annex IV of Regulation (EU) [...] [NRP].</p> <p>DK (Comments): DK: When interoperability was suggested as an amendment to Regulation (EU) 2021/2115, it was specified that interoperability was not part of the basic Union requirements. A similar exemption should be added to this article given that this is currently a rather open-ended and potentially very extensive undertaking for the MS.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>FI (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029</p> <p>FR (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029<u>2031</u></p> <p>FR (Comments): Modification en lien avec la transmission du premier rapport de mise en œuvre à mi-parcours. EN : Amendment related to the submission of the first mid-term implementation report.</p> <p>HR (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029. of the by December 16 of the year following the first year of implementation</p> <p>HR (Comments): This change proposal reflects the possibility of the introduction of transitional period, if legal framework is not prepared on time to start implementation on January 1, 2028.</p> <p>IT (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029.</p> <p>IT (Comments): See above for explanation.</p> <p>LV (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029 by using A? system.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>LV (Comments): How the report shall be submitted? Using SFC or other system?</p> <p>LU (Drafting suggestions): Member States shall submit the first annual report to the Commission by 16 December 2029.</p> <p>SE (Drafting suggestions): Member States shall submit the first biannual report to the Commission by 16 December 203029.</p> <p>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>
<p>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</p>	<p>BE (Drafting suggestions): 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> <p>FI (Drafting suggestions): 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>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
<p>referred to in paragraph 3, point (b).</p>	<p>FI (Comments): The empowerment is too broad. It should apply only to the data governance authority, not to other obligations of the Member State</p> <p>FR (Drafting suggestions): .</p> <p>SE (Drafting suggestions): 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> <p>SE (Comments): Sweden proposes to delete the empowerment in paragraph 5, but to transfer a part of the text to paragraph 6 (new point (aa)).</p>
<p>6. The Commission may adopt implementing acts laying down rules on:</p>	<p>BE (Drafting suggestions): 6. — The Commission may adopt implementing acts laying down rules on:</p> <p>FI (Drafting suggestions): 6. — The Commission may adopt implementing acts laying down rules on:</p> <p>FI (Comments):</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>There is no need for implementing acts. The basic act must contain the necessary provisions to ensure the legal protection of the Member States.</p> <p>SE (Drafting suggestions):</p> <p>6. The Commission may adopt implementing acts laying down rules on: (aa) NEW interoperability and seamless data exchange between information systems used for the implementation, monitoring and evaluation of the CAP;</p> <p>SE (Comments):</p> <p>Sweden also proposes to delete the empowerment in paragraph 5, but to transfer a part of the text to paragraph 6 (new point (aa)).</p>
(a) form and content of the Roadmap and annual report;	<p>BE (Drafting suggestions):</p> <p>(a) form and content of the Roadmap and annual report;</p> <p>FI (Drafting suggestions):</p> <p>(a) form and content of the Roadmap and annual report</p> <p>FR (Drafting suggestions):</p> <p>(a) form and content of the Roadmap and annual report;</p> <p>FR (Comments):</p> <p>Modification liée à la suppression du rapport annuel proposée ci-dessus.</p> <p>EN : Amendment related to the proposed elimination of the annual report above.</p> <p>IT (Drafting suggestions):</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>(a) form and content of the Roadmap and annual report; IT (Comments): See above for explanation. LV (Drafting suggestions): (a) form and content of the Roadmap and annual report; LU (Drafting suggestions): form and content of the Roadmap and biannual reports; LU (Comments): The reports should not be annual SE (Drafting suggestions): a) form and content of the Roadmap and biannual update report; SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>
<p>(b) arrangements for transmitting or making available to the Commission the Roadmaps and annual reports.</p>	<p>BE (Drafting suggestions): (b) — arrangements for transmitting or making available to the Commission the Roadmaps and annual reports. FI (Drafting suggestions): (b) — arrangements for transmitting or making available to the Commission the Roadmaps and annual reports.</p>

CY PCY suggestions	Drafting suggestions and Comments
	<p>FR (Drafting suggestions): arrangements for transmitting or making available to the Commission the Roadmaps and annual reports.</p> <p>FR (Comments): Modification liée à la suppression du rapport annuel proposée ci-dessus.</p> <p>EN : Amendment related to the proposed elimination of the annual report above.</p> <p>IT (Drafting suggestions): (b) arrangements for transmitting or making available to the Commission the Roadmaps and annual reports.</p> <p>IT (Comments): See above for explanation.</p> <p>LV (Drafting suggestions): (b) arrangements for transmitting or making available to the Commission the Roadmaps and annual reports.</p> <p>LU (Drafting suggestions): arrangements for transmitting or making available to the Commission the Roadmaps and biannual reports.</p> <p>LU (Comments): The reports should not be annual</p> <p>SE (Drafting suggestions): (b) arrangements for transmitting or making available to the Commission the Roadmaps and biannual updates reports.</p>

CAP post-2027 Block V

CY PCY suggestions	Drafting suggestions and Comments
	<p>SE (Comments): Sweden supports the concept of this Article but would like to see some changes to avoid unnecessary administrative burden.</p>
<p>These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 24.</p>	<p>BE (Drafting suggestions): These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 24.</p> <p>FI (Drafting suggestions): These implementing acts shall be adopted in accordance with the examination procedure referred to in Article 24.</p>