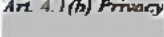


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Mr Janusz Wojciechowski
Commissioner for Agriculture
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Brussels, 19th March 2021

RE: Copa and Cogeca views for the next trilogue meeting on the proposal for a Horizontal regulation

Dear Commissioner,

In view of the next trilogue meeting on the proposal for a Horizontal regulation, Copa and Cogeca would like to share with you some of our views.

Copa and Cogeca has stated in several occasions its support for the new delivery model. A vital part of the shift from compliance to performance is the results-based system. The result-based system moves away from the rigid rules and compliance checks and penalties on non-relevant issues, while ensuring that the emphasis is put on encouraging beneficiaries to follow more sustainable practices. In this regard CAP rules need to be clearer, the legal framework and the indicators simple and workable in order to achieve the best possible outcomes on the ground.

Farmers and their cooperatives are ready to support the new delivery model provided it delivers simplification for beneficiaries and does not endanger the communality of the policy. In our view, this should target a reduction in the administrative burden, for both farmers and administrations and make possible the design of measures and the setting-up of targets adapted to the national needs and circumstances based on common EU objectives. Performance incentives which are properly designed can help meet these objectives, allow for better outcomes and encourage farmers to be more efficient. Farmers would thus also be able to assess the sustainability of their practices.

In this result-based framework, it has to be very clear what the responsibilities of the Commission and those of the Member States are, as the Commission will no longer interact with the individual beneficiaries but places the responsibility on Member States. Copa and Cogeca consider that the power given to the Commission to extend checks to the type of interventions and therefore to single beneficiaries, is a step back from the new delivery model.

It would be worrying if two different systems would be applied at the same time as this would lead to confusion for the beneficiaries, possibly doubling of controls and not contribute to simplification. The new delivery model based on performance should strive to guarantee a real reduction and simplification of controls at farm level.

The use of information stemming from other already existing sources should be exploited. In this regard, the need to register the group to which the beneficiaries belong is redundant as there is already an Ultimate Beneficiary Registry in place. Another example is a wider use of the

Arachne tool to further contribute to simplification and reduction of administrative burden as long as consistency with the data protection principles is ensured.

Yours faithfully,

Personal Data

Personal Data

CC : Mr Wolfgang Burtcher, Director-General of DG Agri