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

Brussels, 19th January 2021

RF: Copa and Cogeca views for the next trilogue meeting on the Strategic Plans Regulation

Dear Commissioner,

Copa and Cogeca would like to wish you a fruitful year and all possible success in achieving a good outcome for farmers and cooperatives in the ongoing CAP negotiations. Such an agreement, to be achieved in a timely manner is necessary to ensure certainty, predictability, and vision for the future. It is extremely important that the future CAP is simpler, more efficient and practical both for farmers and administrations.

In view of the next trilogue, Copa and Cogeca would like to share with you some of our views regarding the possible topics of discussion.

Copa and Cogeca has stated in multiple occasions the support to the new delivery model and the result-based system provided that they deliver simplification for beneficiaries and do not endanger the communality of the policy. As such, the basic outlines of the result-based system must be retained and remain fully functional. It is now that the EU Institutions, in the framework of the trilogue negotiations, must deliver on the simplification by reducing the "bureaucracy of CAP support schemes". Given that the new delivery model is expected to put more emphasis on performance and the impact of CAP, its implementation must deliver simpler requirements, simpler, more practical and realistic measures and guarantee timely payments to farmers. Simplification must be the key reference yardstick when assessing any new measures.

Both the EU, Member States and regions must now organise and prepare the new delivery model and the National CAP Strategic Plans. This must be done in such a way that ensures a smooth functioning of these CAP ambitions goals and instruments from 2023 onwards. In this regard, we must ensure coherence between the CAP Strategic Plans regulation and the Horizontal regulation on this performance framework. We must also clearly understand what the Commission and the Member States respective responsibilities are in the framework of the new results-based system in order to make sure that simplification and administrative burden reduction is achieved.

With a shift from compliance to performance, the indicators will play a pivotal role in linking expenditure to output, measuring progress to targets, and assessing the impact of the policy. Indicators must therefore reflect the EU specific objectives and should be developed under the EU legislation. Indicators should also take into account all three pillars of sustainability – economic, environmental, and social – which are fundamental to farmers' competitiveness. That is why, Copa and Cogeca welcomed the reduction of indicators put forward by the European
Commission and rejected any addition of further indicators. For each indicator, there should also be a common methodology applied consistently and coherently in all Member States. The indicator should be fully operational and proportionate to the level of ambition and funding of specific goals and intervention types under the CAP post-2020. The implementation of such a system should take into consideration the Member State’s operational capability to monitor these indicators with the current resources. In line with the primary objective of simplification, any administrative expenses arising from the measurement of the indicators must be kept as low as possible.

Moreover, no additional reporting or control requirements that would represent more red-tape and administrative burden for farmers and/or EU or Member State administrations should be introduced.

Copa and Cogeaa strongly believe that consistent application and implementation of expressly proportionate and appropriate control and sanction requirements, tolerances and bagatelles, automated application procedures and further flexibility through digitalisation can help to quickly pay out CAP premiums for additional services by farmers.

Faithfully yours,

[Signature]

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