EU CAP NETWORK

Study on simplification and administrative burden for farmers and other beneficiaries under the CAP

ANNEXES I, II, III, IV

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EU CAP NETWORK

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Abbreviations

AI	Artificial intelligence
CSP	CAP Strategic Plan
DG AGRI	Directorate General for Agriculture and Rural Development
EAFRD	European Agricultural Fund for Rural Development
EAGF	European Agricultural Guarantee Fund
ECB	European Central Bank
EIP-AGRI	European Innovation Partnership for agricultural productivity and sustainability
ESIF	European Structural and Investment Funds
FADN	Farm Accountancy Data Network
FTE	Full-time equivalent
GAEC	Good agricultural and environmental condition
HICP	Harmonised index of consumer prices
IACS	Integrated administration and control system
LU	Livestock unit
MA	Managing Authority
OG	Operational Group
OP	Operational Programme
PA	Paying Agency
PO	Producer Organisation
RDP	Rural Development Programme
SMR	Statutory management requirement
TC	Commission's targeted consultation on simplification

2023-2027 CAP interventions

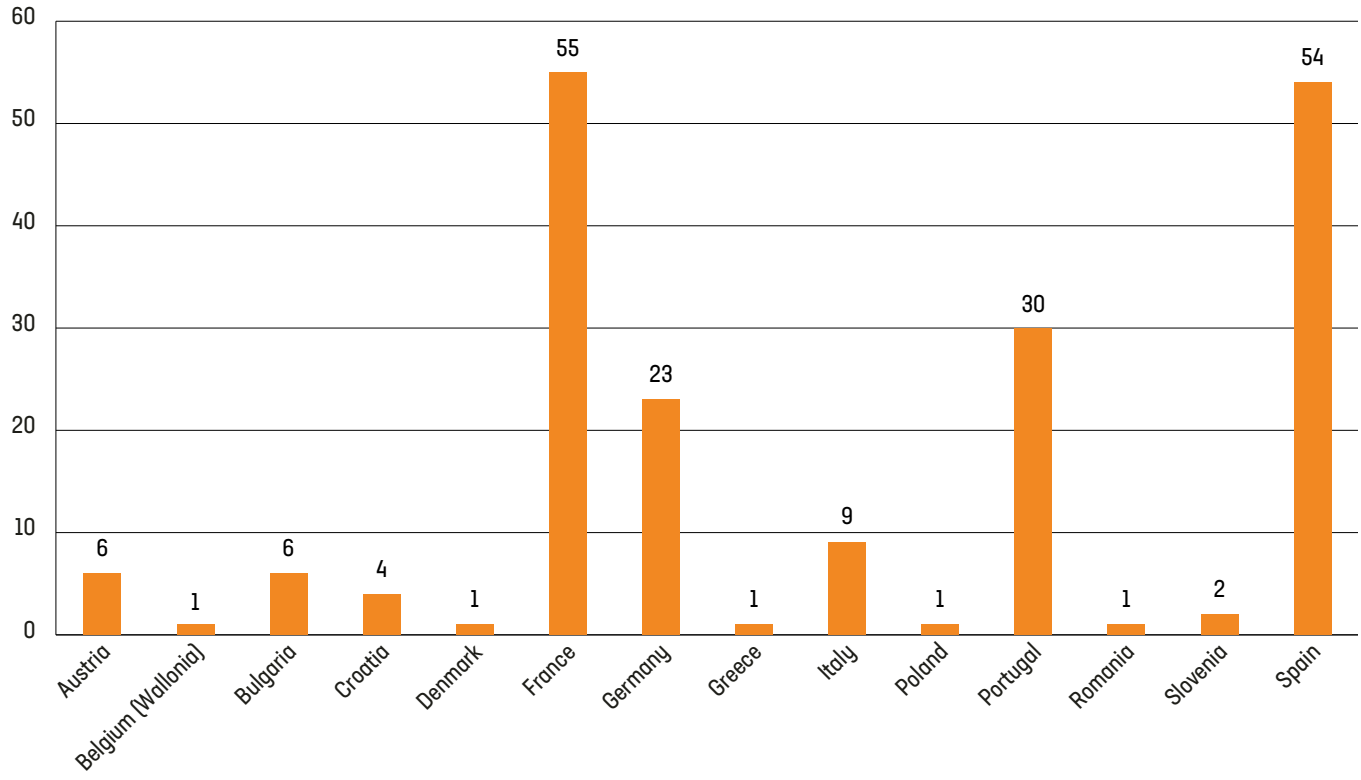
BISS	Basic income support for sustainability
CIS	Coupled income support
CISYF	Complementary income support for young farmers
CRISS	Complementary redistributive income support for sustainability
Eco-schemes	Schemes for the climate, the environment and animal welfare
AECC	Agro-environmental-climate commitments
ANC	Natural or other area-specific constraints
ASD	Area-specific disadvantages resulting from certain mandatory requirements
COOP	Cooperation
KNOW	Knowledge exchange and dissemination of information
INSTAL	Setting-up of young farmers and new farmers and rural business start-up
INVEST	Investments and investments in irrigation
RISK	Risk management tools

ANNEX I. Descriptive statistics of CAP beneficiaries participating in surveys and interviews

1. Surveys of CAP beneficiaries

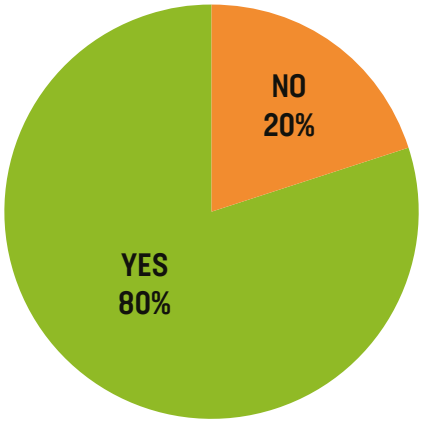
1.1. Wine growers/wine producers

Figure 1. Distribution of wine growers/producers' responses by 14 Member States



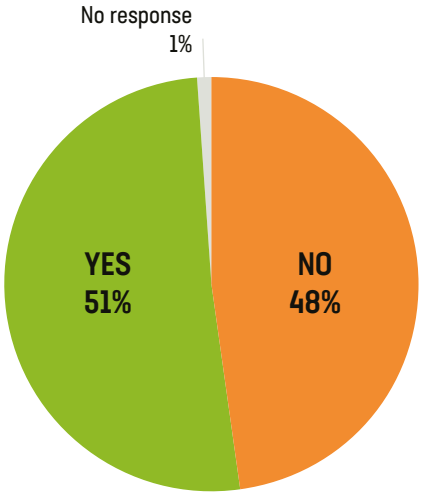
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/producers survey data (N=194 survey responses)

Figure 2. Declared adherence to any 2023-2027 CAP support among wine growers and producers



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/producers survey data (N=194 survey responses)

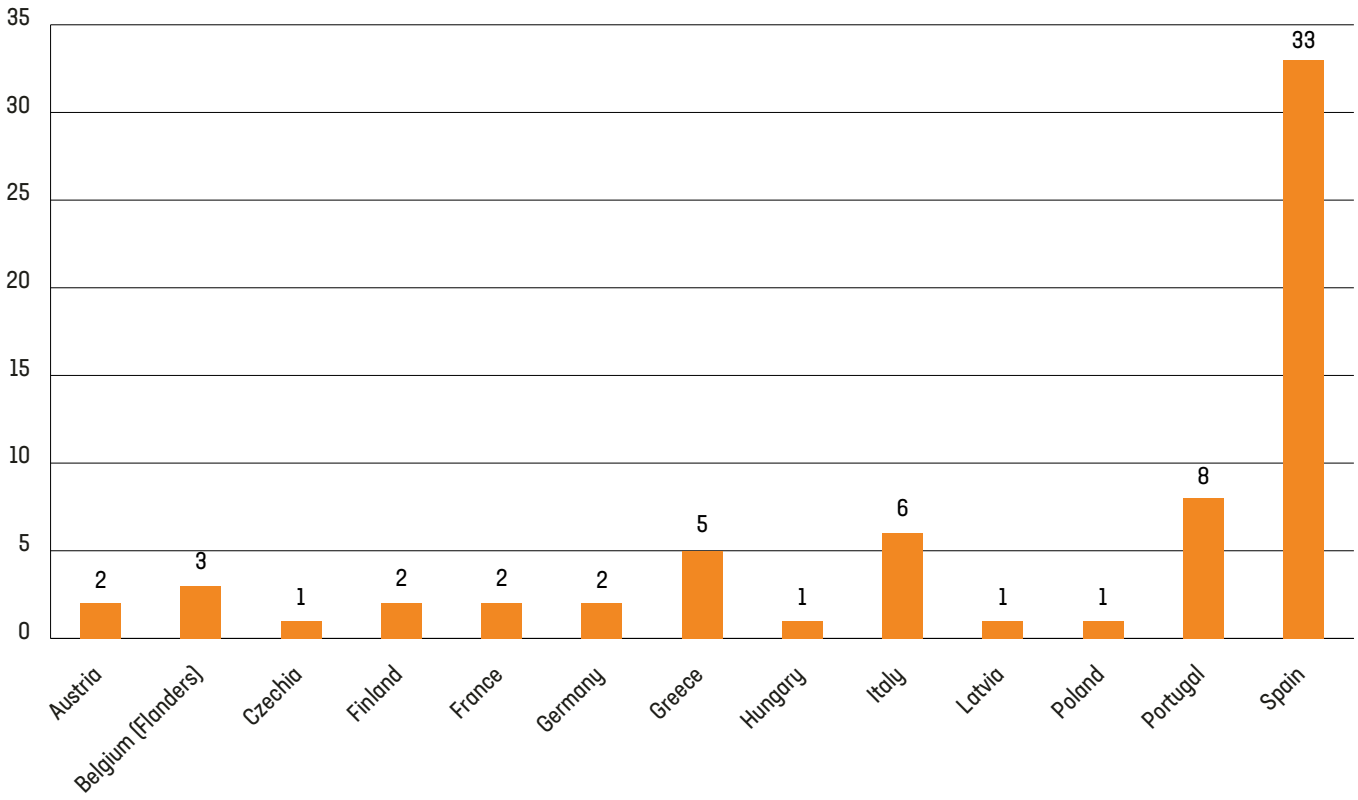
Figure 3. Declared past participation in the 2023 targeted consultation



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/producers survey data (N=194 survey responses)

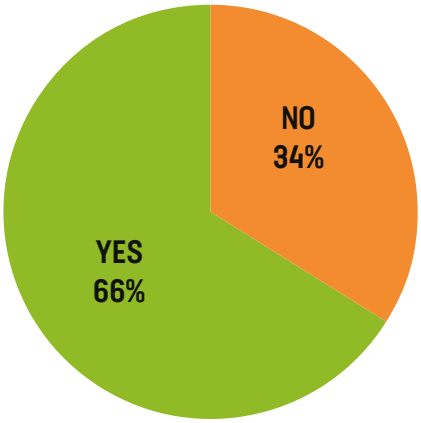
1.2. Producer Organisations

Figure 4. Distribution of Producer Organisations' responses by 13 Member States



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of PO survey data (N=67 survey responses)

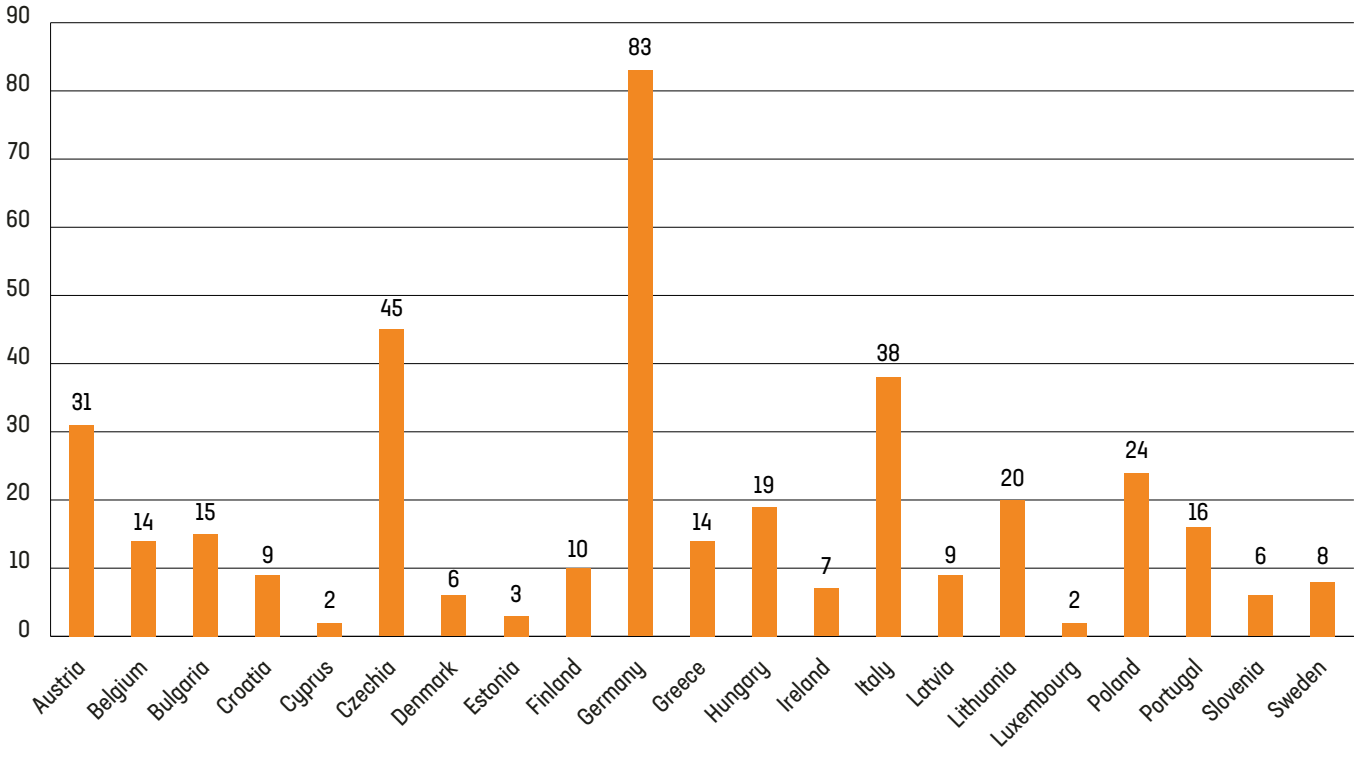
Figure 5. Declared adherence to any type of 2023-2027 CAP support among Producer Organisations



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of PO survey data (N=67 survey responses)

1.3. Local Action Groups

Figure 6. Distribution of Local Action Groups' responses by 21 Member States



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of LAG survey data (N=381 survey responses)

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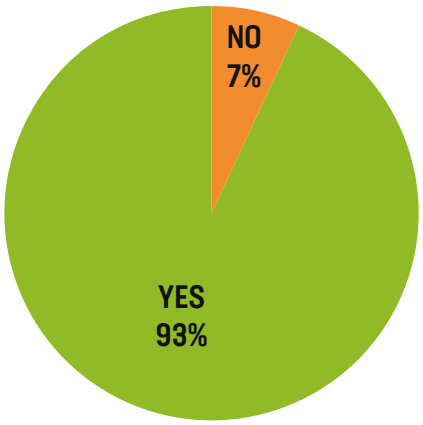

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of LAG survey data (N°.=381 survey responses)

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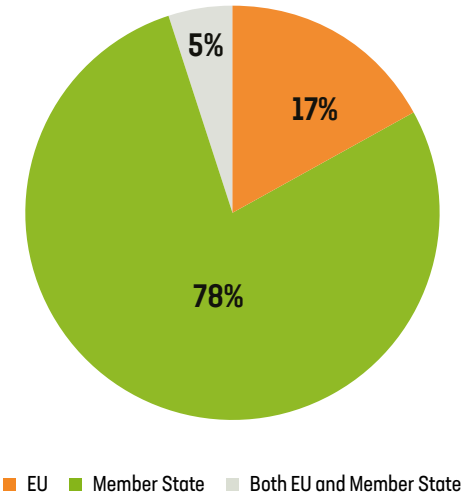
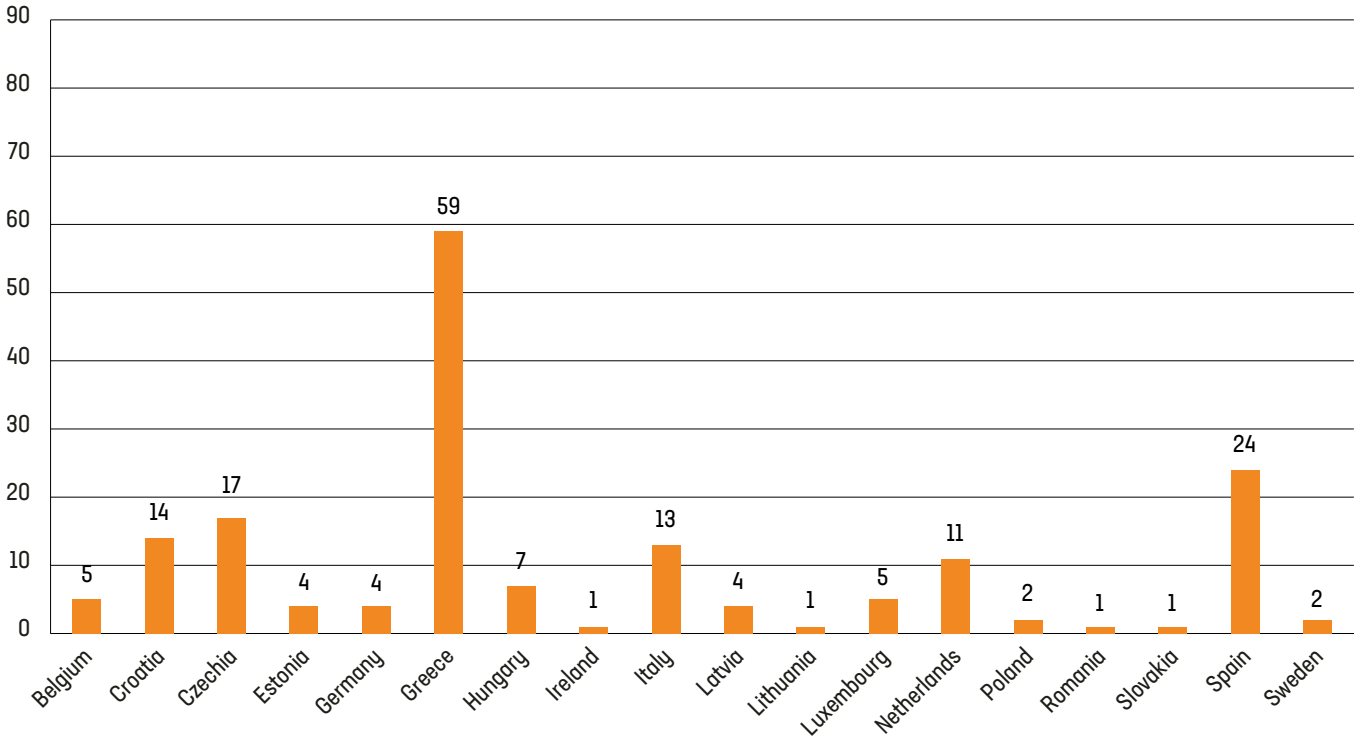
Figure 8. Level of operation of advisory services



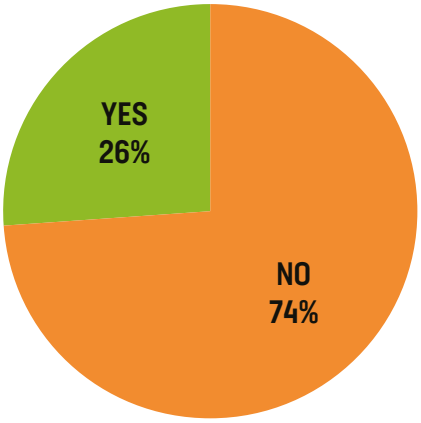
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N=212 survey responses)

Figure 9. Distribution of advisory services' responses by 18 Member States



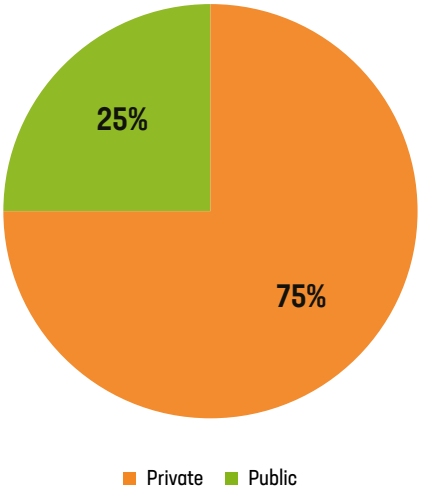
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N=175 survey responses, excluding 'N/A')

Figure 10. Declared adherence to any CAP interventions (such as KNOW) among advisory services



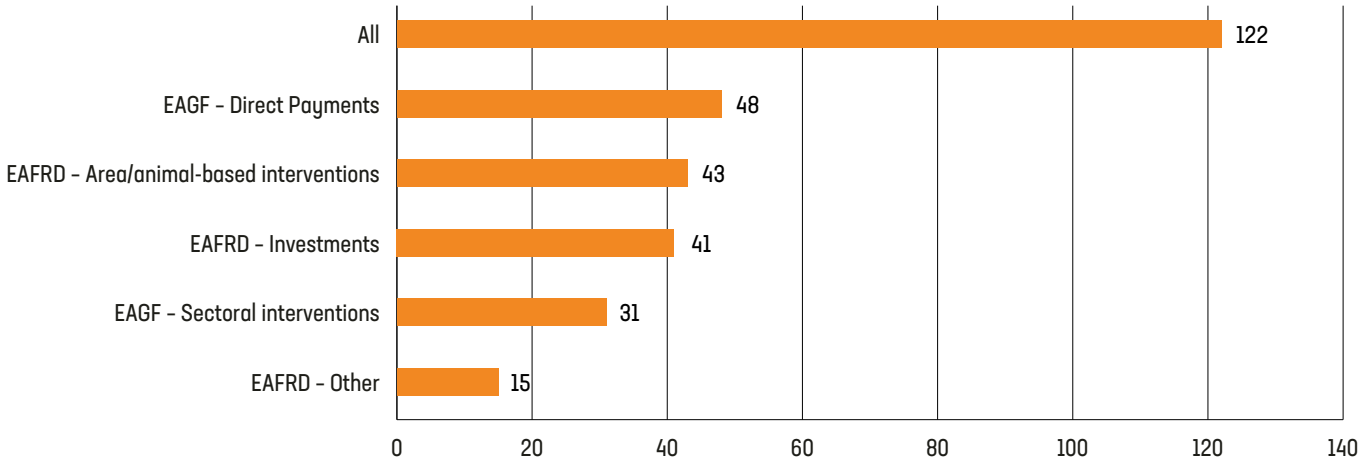
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N°.=212 survey responses)

Figure 11. Type of advisory service



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N=212 survey responses)

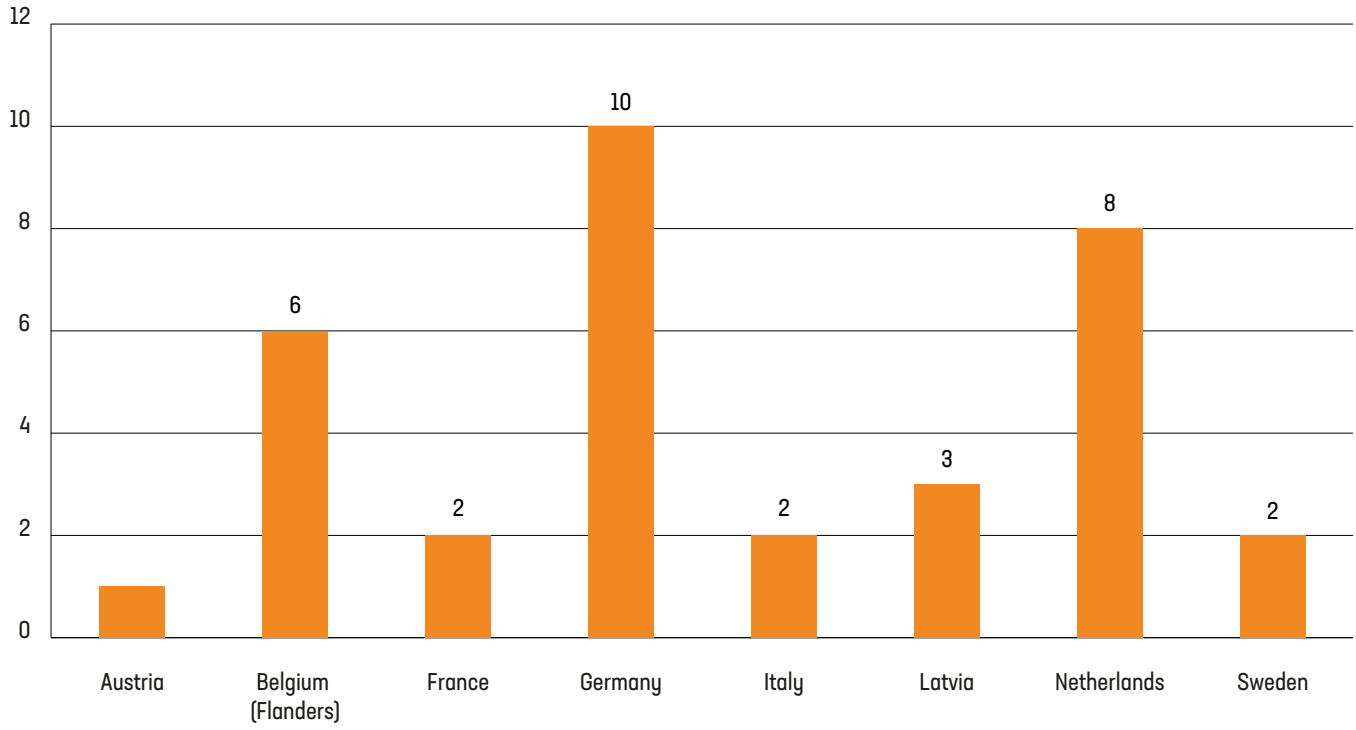
Figure 12. CAP schemes where advice is provided



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N=212 survey responses, multiple-choice allowed)

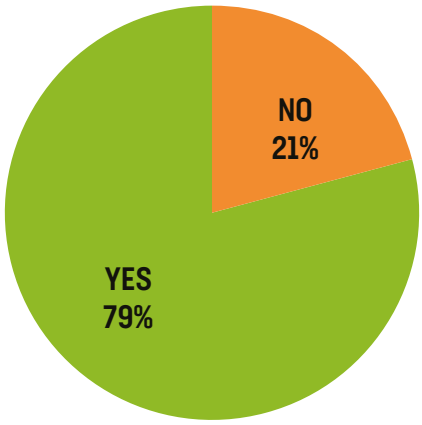
1.5. EIP Operational Groups

Figure 13. Distribution of Operational Groups' responses by Member State (eight Member States)



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of OG survey data (N=34 survey responses)

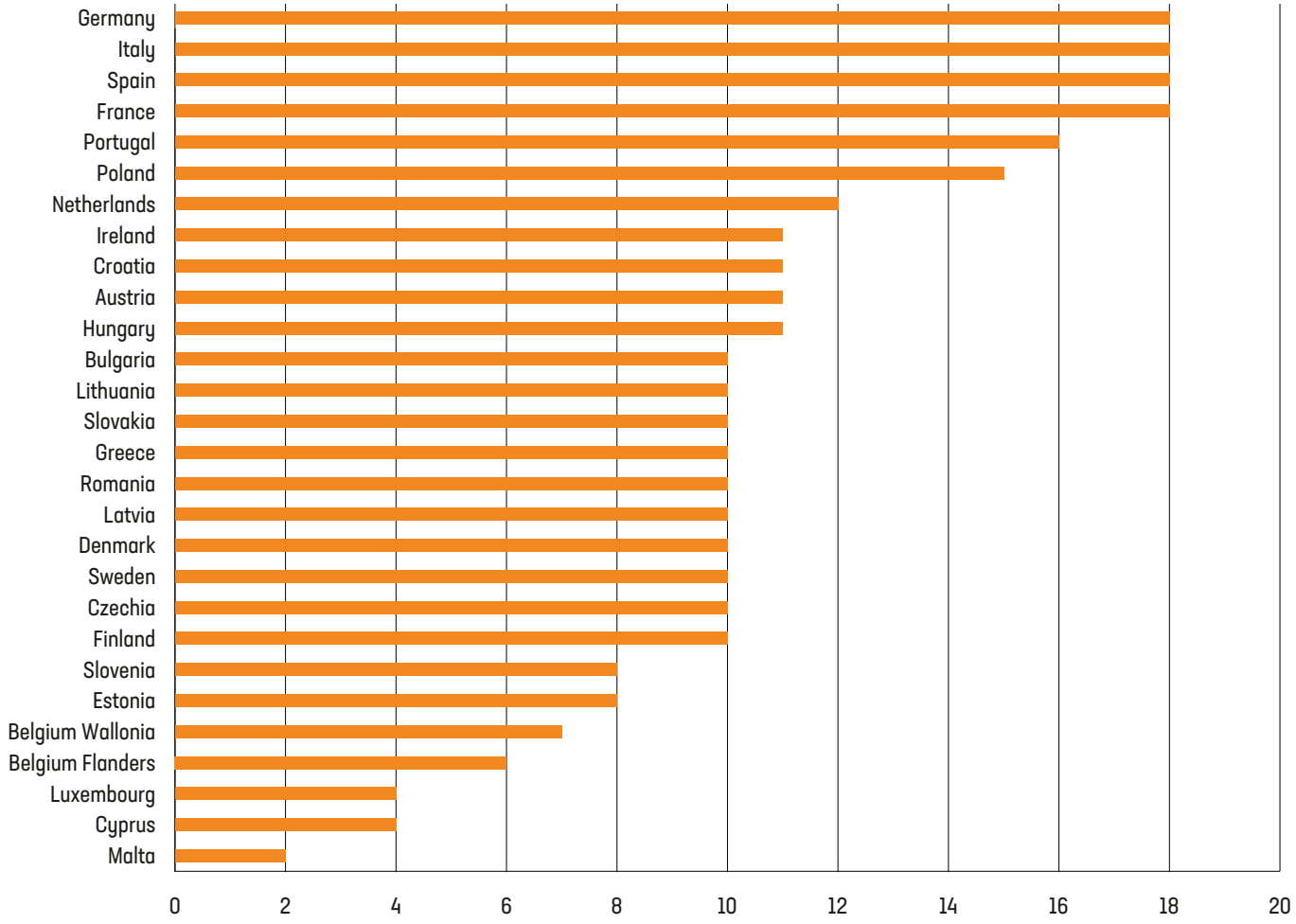
Figure 14. Participation of lead partners of an Operational Group beneficiary of 2023-2027 CAP support



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of OG survey data (N=34 survey responses, where 'Yes' are lead partners, and 'No' are non-lead partners)

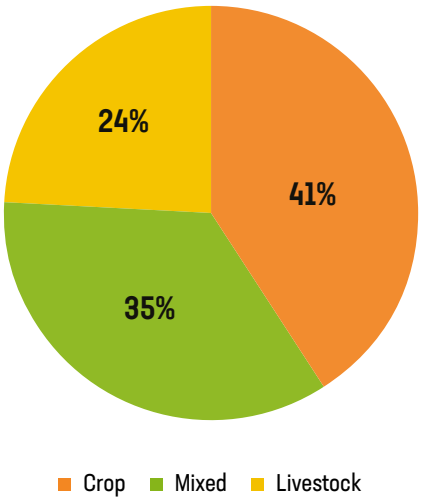
2. Farmer interviews

Figure 15. Distribution of interview respondents by Member State



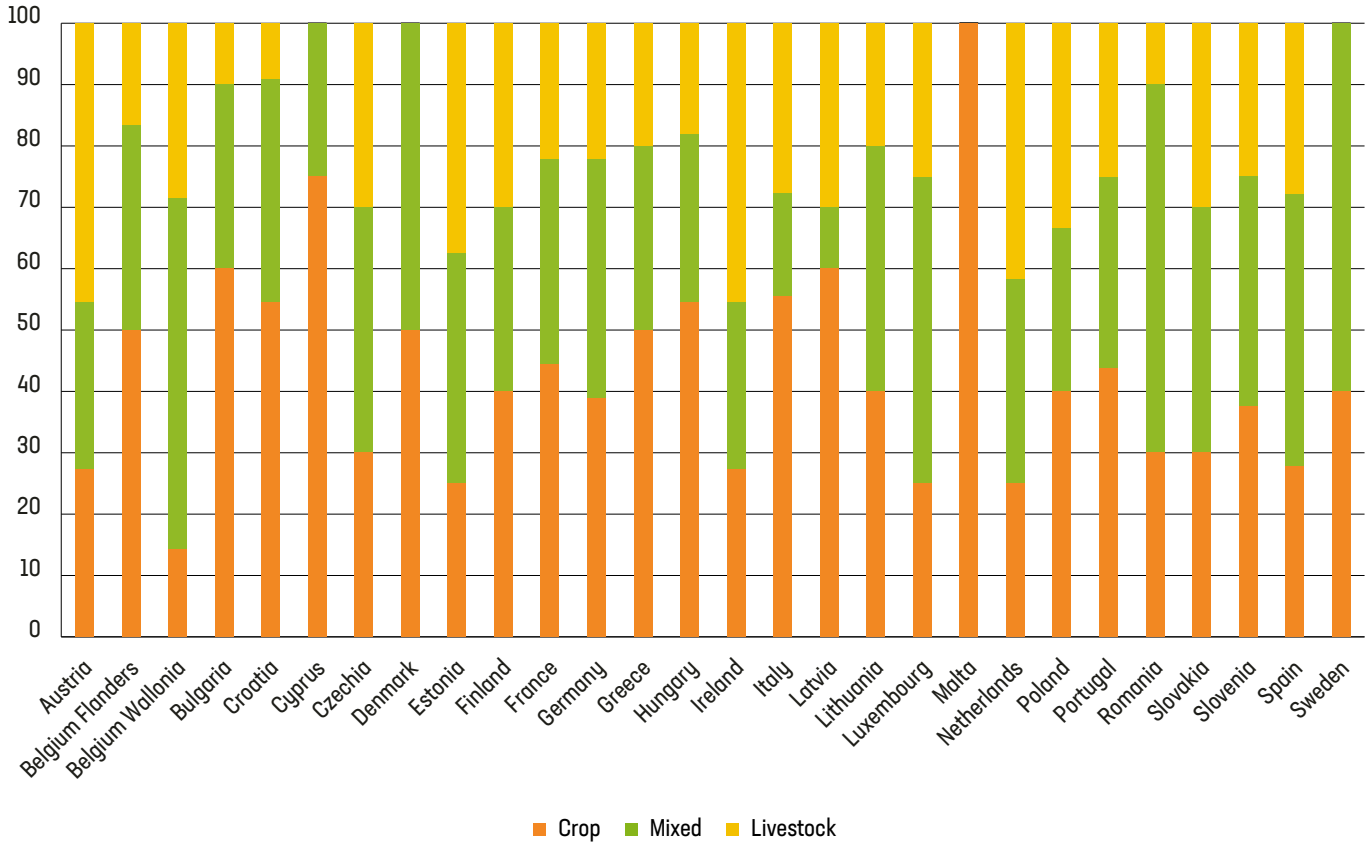
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 16. Distribution of interview respondents by type of farming



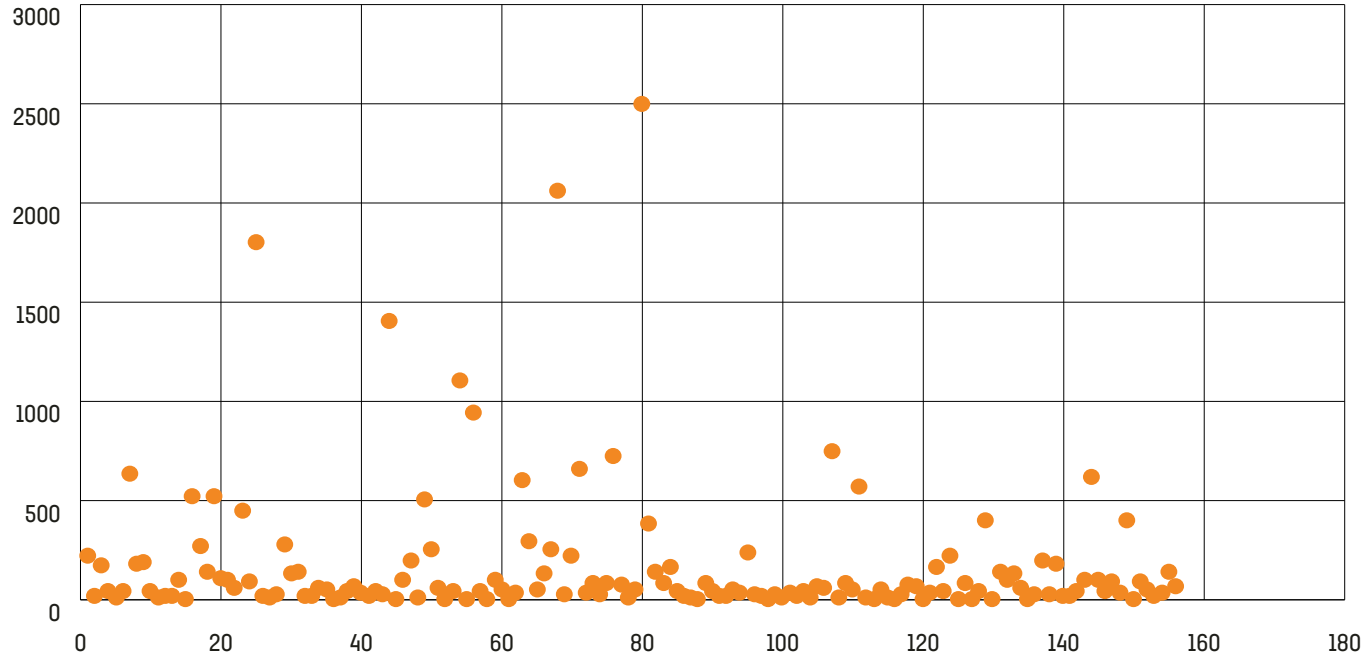
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 17. Distribution of interview respondents by type of farming and Member State



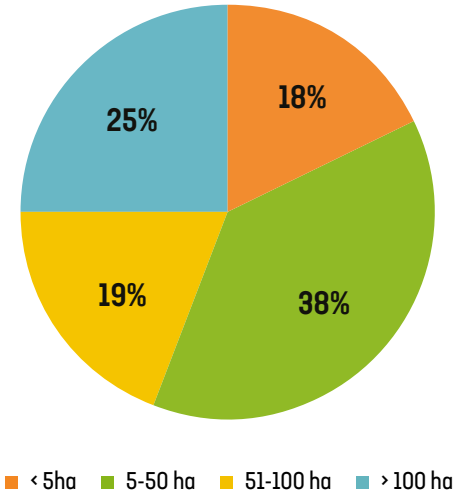
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 18. Distribution of interview respondents by livestock unit (LU)



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=157 responses)

Figure 19. Distribution of interview respondents by farm size



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

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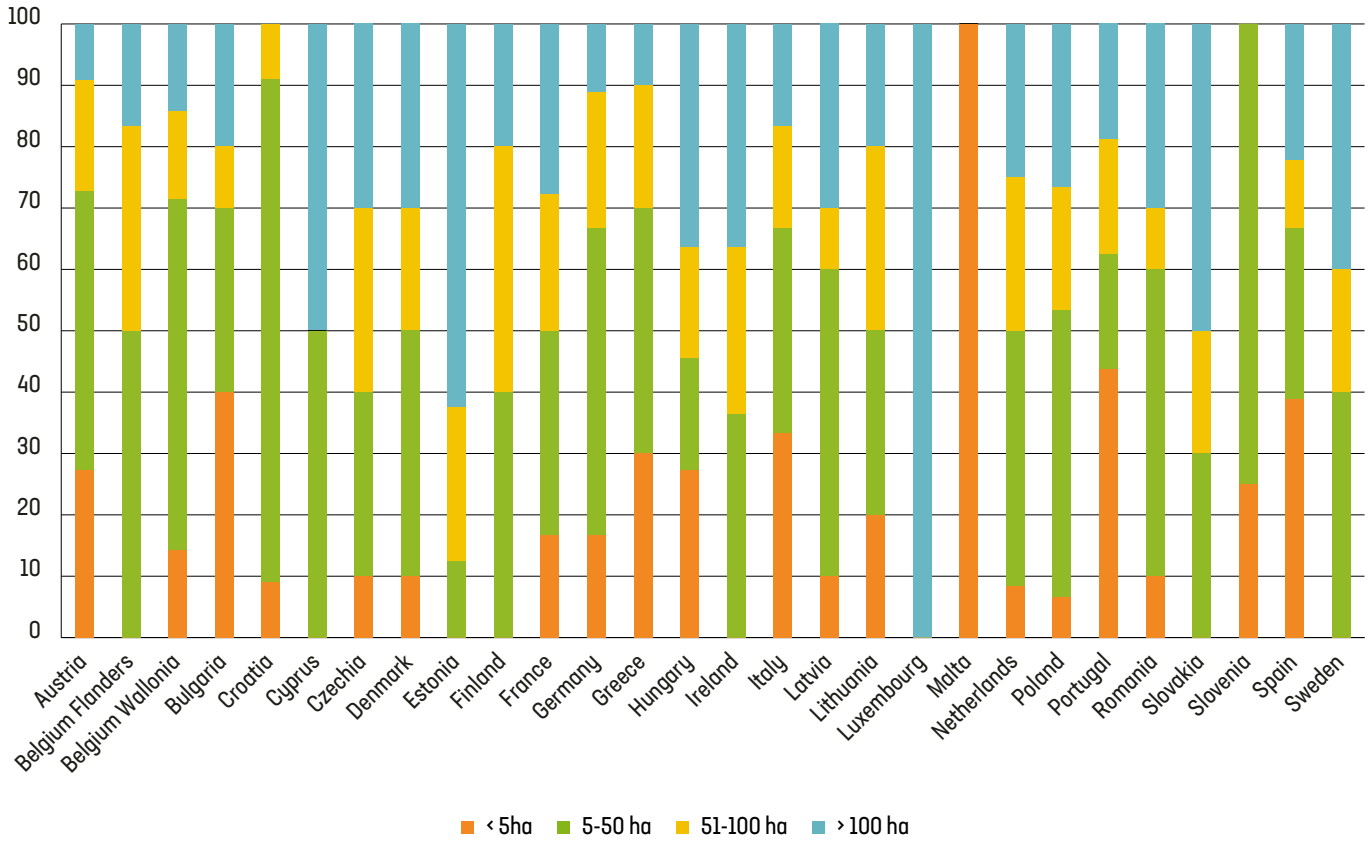

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

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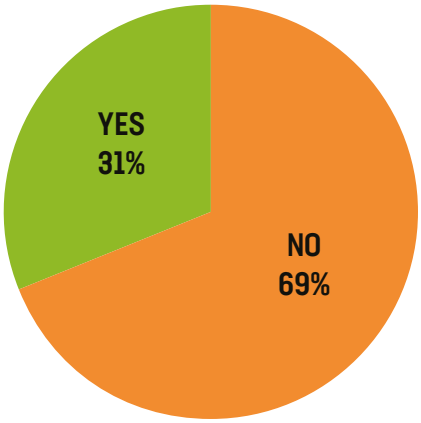
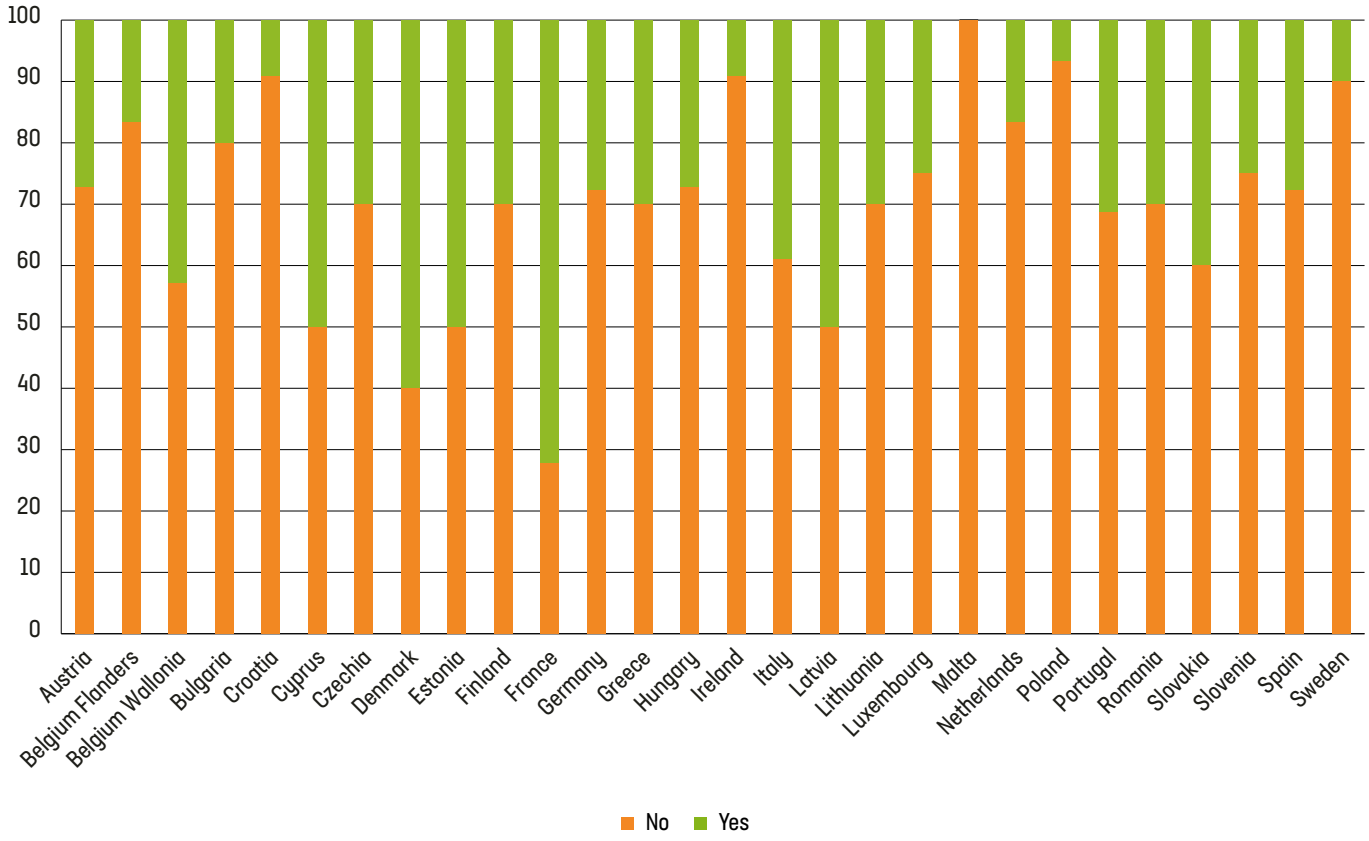


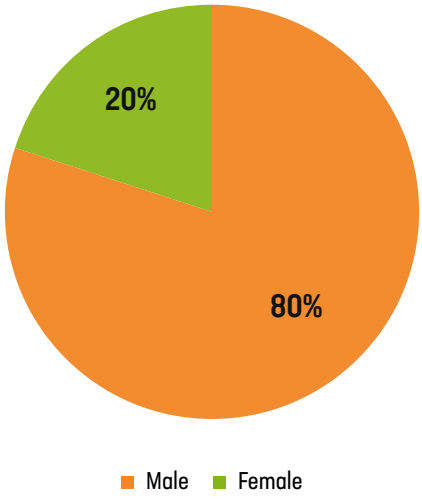
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 22. Distribution of interview respondents by adherence to organic farming and Member State



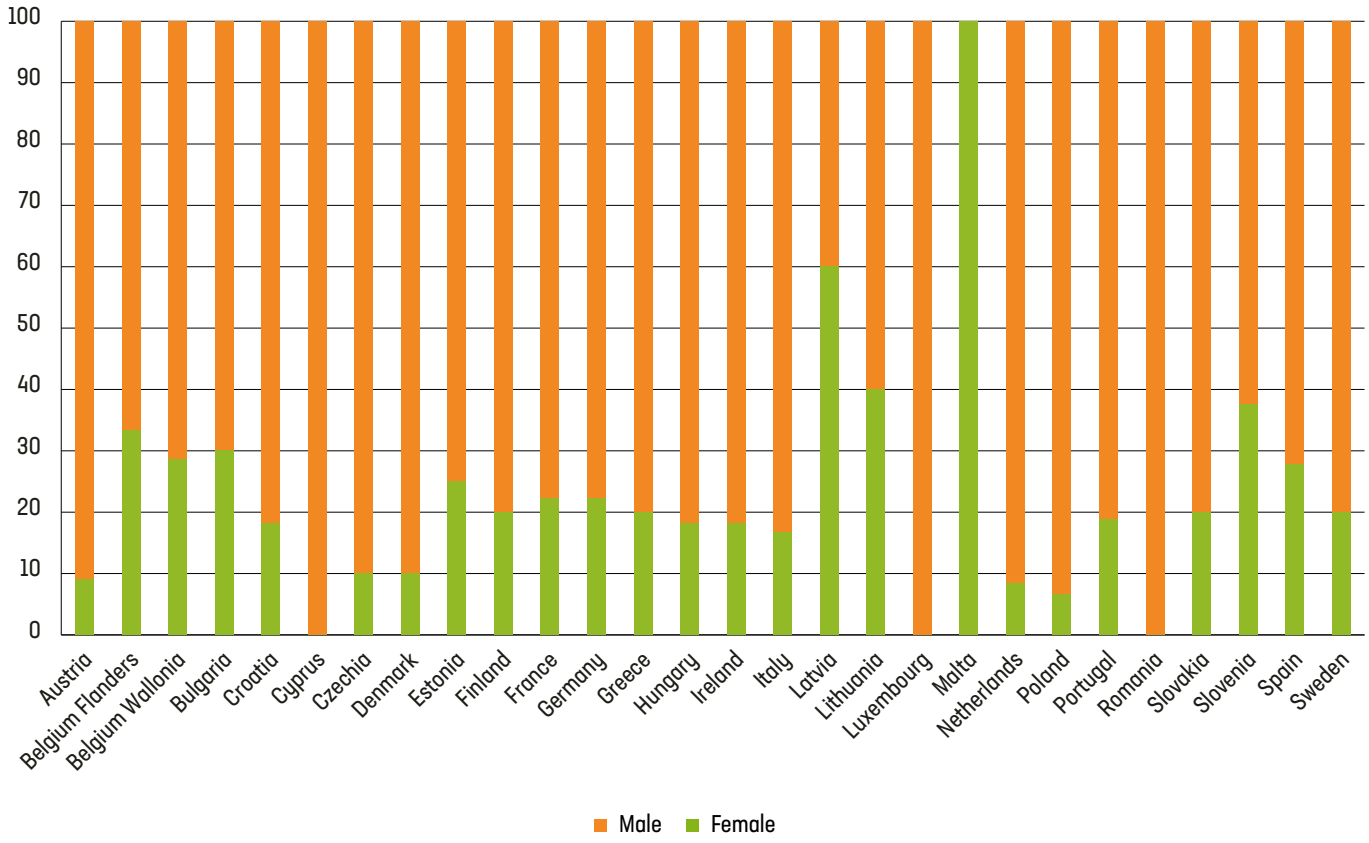
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 23. Distribution of interview respondents by gender



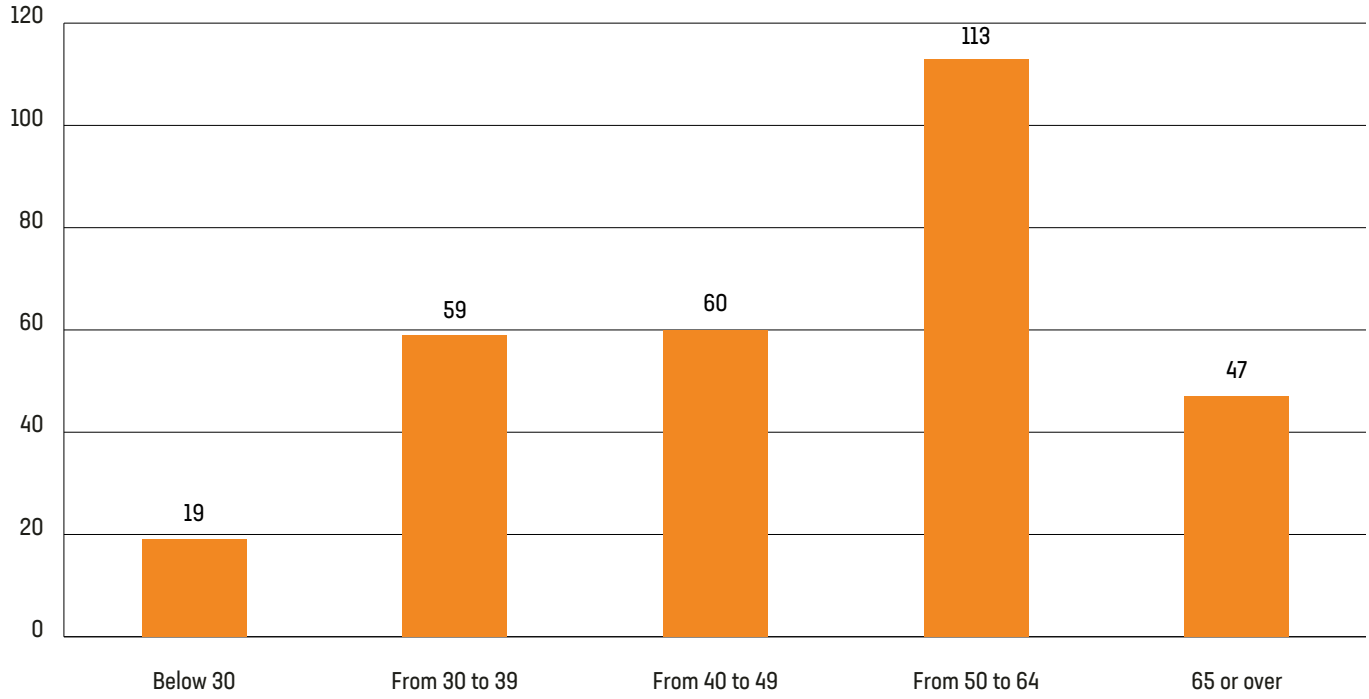
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 24. Distribution of interview respondents by gender and Member State



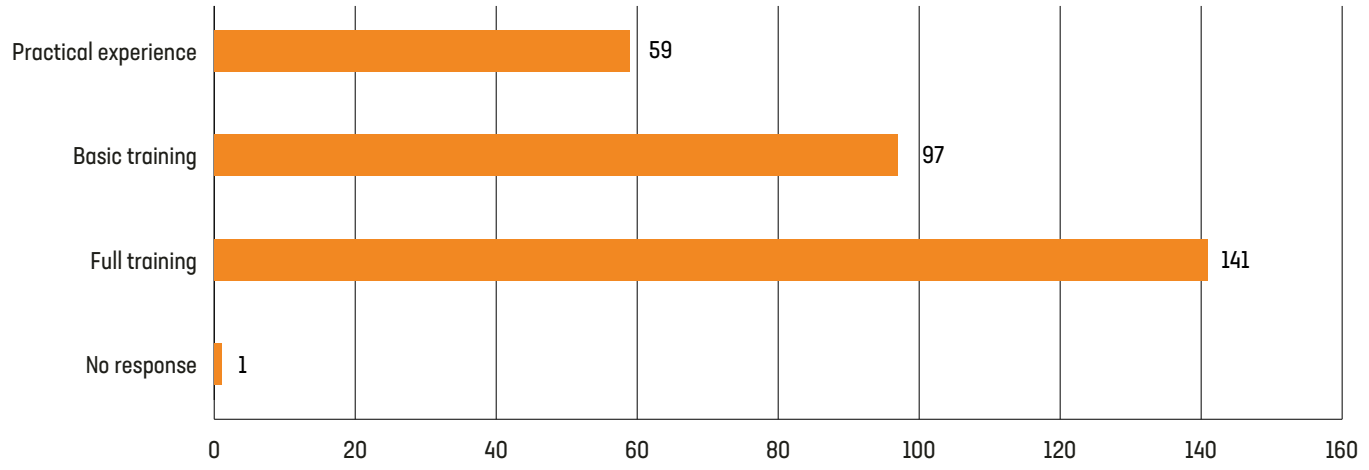
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 25. Distribution of interview respondents by age



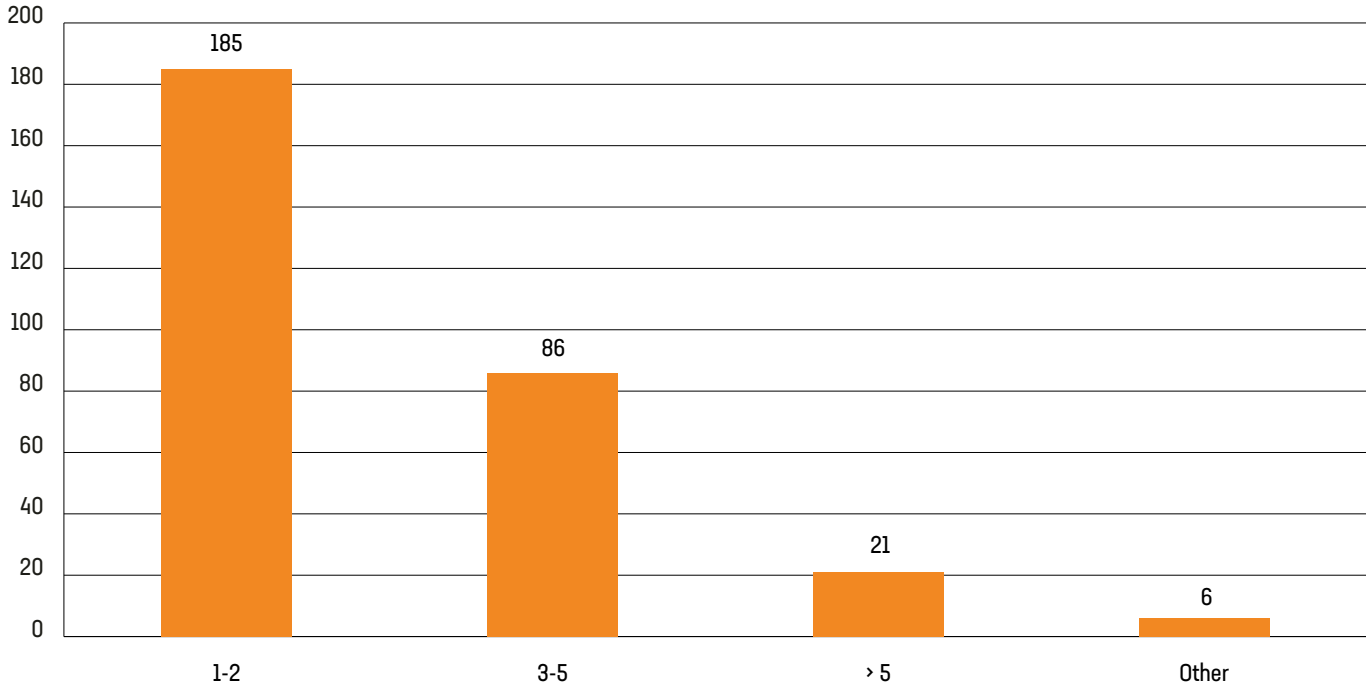
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 26. Distribution of interview respondents by level of training



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

Figure 27. Distribution of interview respondents by number of people working on the farm



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interview data (N=298 responses)

ANNEX II. Methodological notes on analysis of targeted consultation data using artificial intelligence

Data from the targeted consultation (TC) have been included as a primary source of information. This includes initial insights and breakdowns by Member State provided by the European Commission, as well as data from the entire database of TC questions, also processed via artificial intelligence. The following questions were analysed through AI:

Q01 *(open-ended question): Are you applying/have you applied for CAP support? If yes, please specify which support.*

Q09*: How do you rate the complexity of the following? Complexity may be linked to understanding, clarity of the rules, length of the process/operation or technical difficulties.*

Q10 *(open-ended question): Could you please specify the nature of the difficulties you have when applying the requirements set under the good agricultural and environmental conditions (GAECs) or other environmental and sanitary requirements?*

Q13 *(open-ended question): In 2023, did you decide not to apply for certain CAP aid? If yes, which aid did you not apply for and why?*

Q17*: Which of the following data concerning operations on your farm do you record and how do you record it? Does the use of management software/application(s) facilitate your reporting to the authorities?*

Q20 *(open-ended question): Do you have any suggestions for simplifying the burden imposed by procedures and rules linked to financial support under the common agricultural policy (CAP) or other EU rules for food and agriculture?*

A specific AI-powered platform was created, allowing for the categorisation of responses as well as the cross-referencing of data with respondents' characteristics. The platform enabled the team to analyse responses, with open-ended answers translated and categorised to facilitate interpretation. Various filters were applied to narrow down respondents based on specific characteristics, including:

- **type of farming** (16 categories; non-unique responses due to multiple-choice options, although in the analysis we excluded 'Other');
- **farm size** (seven unique categories, although the analysis excluded 'N° land' and grouped '101-250 ha', '251-500 ha' and 'more than '500 ha');
- **age** (five unique categories);
- **participation in the EU organic scheme** (yes/no);
- **CAP support category** (not comprehensively or uniformly categorised, except for Q01);
- **Member State**; and
- **Sentiment, tone and emotion categorisation** (applied to Q20).

These filters allowed for a detailed analysis of how variables such as farming type, farm size, age, organic participation, CAP support, Member State and emotions' influenced responses.

The sentiment corresponds to the classification of responses into positive (supportive, enthusiastic), neutral (neither strongly positive nor negative, often providing constructive feedback or asking questions) and negative (critical, disagreeing or expressing dissatisfaction). The tone corresponds to the classification of responses into constructive (providing specific, actionable feedback or suggestions), destructive (criticising without offering alternatives or solutions), informative (providing additional information or context), and rhetorical (using persuasive language or emotional appeals). The emotion corresponds to the classification of responses into angry-frustrated (expressing strong dissatisfaction or annoyance), sad-disappointed (expressing disappointment or sadness), happy-relieved (expressing happiness or relief) and confused-unsure (expressing uncertainty or confusion).

As for the analysis by type of farming, TC selections were grouped into three macro-categories, though for some additional analysis of Q09 'Crops' was also subdivided into three sub-categories in the charts:

1. Crops (cereals, other field crops, other permanent crops, olive oil, wine, horticulture without greenhouses and in greenhouses)
    - Arable crops (cereals, other field crops)
    - Permanent crops (olive oil, wine, other permanent crops)
    - Horticulture (horticulture without greenhouses and in greenhouses)
2. Livestock (beef, milk, sheep and goats, pigs, laying hens, apiculture, poultry meat)
3. ForestryFor open-ended questions, additional classifications were used to merge overlapping categories and group responses thematically, enabling more reasonable and effective analysis.

For Q01 and Q13 specifically, eight aid-type categories (e.g. direct payments excluding eco-schemes, eco-schemes only, ANC and ASD) were created to identify patterns across different beneficiary groups. The types of aid were grouped into the following categories:

1. Direct payments (except eco-scheme) i.e. BISS, CIS, CISYF, CRISS, coupled aid not specified, small farmers scheme payment and payment for cotton
2. Only eco-schemes
3. Only organic
4. AECC or AECM + other management commitments
5. ANC and ASD
6. Investments
7. Sectoral support
8. Other RD support (RISK, INSTAL, KNOW, COOP).

Analysis of Q10 was split into two parts: the close- and open-ended part of the question. Through AI, the study focused specifically on the open-ended section of Q10. The following four macro-categories group the categories given by AI for the analysis of Q10:

1. Clarity and complexity of rules including farmers knowledge and capacity:
   - Clarity and communication
   - Complexity and uncertainty
   - Inconsistencies and lack of clarity
   - Regulatory complexity
   - Overregulation
   - Capacity and knowledge gaps
   - Information gaps
   - Knowledge and understanding
   - Conflicting policies
   - Change of management (rules changing too frequently)
2. Content of (environmental) rules:
   - Environmental challenges (mostly about environmental regulation)
   - Environmental and ecological challenges
   - Farming practice limitations
3. Administrative burden:
   - Certification and compliance
   - Administrative challenges
   - Documentation and record keeping
   - Regulatory enforcement (issues with compliance, controls, sanctions)
   - Digitalisation and technology
   - Monitoring and control
4. Costs and financial constraints:
   - Cost and funding constraints
   - Economic constraints
   - Financial constraints
   - Financial difficulties
   - Insufficient resources
   - Resource limitations

To generate numerical and graphical data from the AI analysis, it was necessary to manually download data for each question and apply specific filters. Much of the analysis conducted using AI provides an overview of the extent to which the distribution of responses across age groups, farm sizes and types of farming varies in relation to the distribution within the general population.

ANNEX III. Methodological notes on cost quantification

This annex outlines the steps undertaken to clean the data gathered from the TC, farmer interviews and surveys of other CAP beneficiaries, providing detailed insights into the various calculations performed for the analysis to answer RQ2. It presents the assumptions made while cleaning the data and calculations made to estimate the quantification of the administrative burden and highlights the associated limitations.

The first chapter focuses on the steps taken to estimate the administrative burden for farmers arising from the 2023-2027 CAP. It provides an overview of the treatment of data from the TC and the calculations used to estimate internal and external costs. The second chapter discusses the assumptions applied to process the data collected from surveys targeting other beneficiaries, including the limitations encountered in estimating the administrative burden for these groups. These beneficiaries include wine growers and producers, Producer Organisations in the fruit and vegetable sector, Local Action Groups, EIP Operational Groups and advisory services.

1. Administrative burden arising from 2023-2027 CAP for farmers

1.1. Data from the targeted consultation

1.1.1. Data mining and cleaning

Two specific filters were applied to extract the relevant information from farmers for the TC. First, the respondents who answered 'Yes' to the question 'I am giving my contribution as a farmer/farm manager' were selected. Second, those who answered 'Yes' to the question 'Are you applying/have you applied for CAP support?' were included. Applying these filters reduced the dataset to 21 821 responses out of the total 26 886 responses. The three questions analysed to estimate the cost of administrative burden for the farmers per Member State are listed below.

Analysis of key questions for answering RQ2

Q11: *Did you use outside help to prepare and submit your CAP aid application(s)? If they answered 'Yes', they were prompted with follow-up questions:*

- Who provided this service? If 'Other', please specify.
- What was the cost of this service in your own currency, where applicable?
  - For the annual CAP aid application
  - For the investment CAP aid application
  - For other CAP aid.

To clean and analyse the open-ended responses regarding the cost of these services, the following steps were undertaken:

1. Translation: all responses were translated into English to ensure consistency across the dataset.
2. Currency conversion: the reported costs were converted from the respondents' local currencies into euros. The exchange rates used were the average rates for 2023, based on the European Central Bank's (ECB) foreign exchange reference rates [1].

Some respondents indicated 'Yes' to receiving support, though they did not provide any quantifiable service costs. In addition, some respondents answered 'Yes' and then reported a cost of zero for all three categories or other organisations providing the services. Refer to the following Section 1.1.2 for the treatment of these specific cases.

Q12: *Approximately how much time do you, your family members, or employees altogether spend annually on administrative tasks linked to the application(s) for CAP aids, including the documents to be prepared for conditionality (1 working day equals 8 hours)? If they answered more than six working days, they were prompted with the follow-up question:*

If more than six working days, can you please specify?

To clean and quantify the open-ended responses to Q12, the study followed the following steps:

1. Translation: all responses were translated into English to ensure consistency across the dataset.
2. Quantification: all quantifiable answers were converted into working days. This was based on the assumptions of an 8-hour productive workday, a 5-day week, and 48 working weeks per year.
3. Handling non-quantifiable answers: blank responses and responses that could not be quantified were marked as 'NA'.

A sensitivity analysis was conducted to assess the impact of outlier treatment and the choice between average or median values on the estimations of the administrative burden costs for farmers under the 2023-2027 CAP. A detailed overview of these estimations is provided in Section 1.1.3.

1 See more at: https://www.ecb.europa.eu/stats/policy_and_exchange_rates/euro_reference_exchange_rates/html/index.en.html.

Q19: *In the last three years, has an inspector checked your farm in person (not including checks for certification)? If yes, how much time did you spend on average dealing with a single inspection visit, including preparation and follow-up (one working day equals 8 hours)?*

For Q19, further cleaning was not needed, given that no open answers were included. Refer to the following Section 1.1.4 for an overview of the results.

1.1.2. Q11 - Cost of external advice services

Question 11 of the TC explored whether respondents received external assistance in preparing and submitting their CAP aid application(s) for 2023. If respondents answered 'Yes', they were asked to provide the cost of this service in their local currency. The costs were categorised into three types of services: the annual CAP aid application, the investment CAP aid application and other CAP aid-related services. Out of the 21 821 analysed responses, 78% (17 033 respondents) reported receiving external help to prepare and submit some or all of their CAP aid applications. For the follow-up question on quantifying external costs, open-ended responses were cleaned and standardised to ensure consistency and comparability. Since some respondents did not provide costs for all types of CAP aid applications (annual CAP aid application, investment CAP aid application, and other CAP aid), the study treated the data with the following considerations:

1. N° external help: responses in which farmers indicated they did not use external help to prepare and submit CAP aid applications were recorded as zero costs (4 788 responses out of 21 821 responses).
2. Exclusion of blank answers: responses where farmers indicated they used external help to prepare and submit CAP aid applications but did not provide any costs were excluded as blank entries. (5 301 responses out of 17 033).
3. N° reported costs for external help: some farmers reported using external advisory services but provided an associated cost of zero for all types of CAP aid applications. This may be due to advisory services being free of charge, subsidised by public programs, or not involving a direct financial cost (e.g., services related to product marketing). These responses were recorded as zero costs (1 269 out of 17 033).

Once the data was cleaned, the costs provided by farmers in local currency were converted into euros for comparison purposes. The three types of costs were then summed up to calculate the total advisory service cost. Due to the significant variability in reported costs, an analysis was conducted to identify and remove potential outliers. For example, some farmers reported unusually high expenditures due to one-time consulting needs, such as advisory services for specific Rural Development Programme (RDP) measures involving large budgets. These costs did not represent typical yearly expenses and could disproportionately affect the overall estimate. To address this, the calculation of the average was restricted to responses below EUR 10 000.

1.1.3. Q12 - Time spent by farmers on administrative tasks

1.1.3.1. Quantification by time ranges

Q12 of the TC asked respondents about how much time they, their family members or employees spend annually on administrative tasks linked to CAP aid applications.

Of the 21 821 analysed responses, 33% (7 178 respondents) reported spending **more than six working days** annually on these tasks. Among those, 3 891 responses were not quantifiable due to missing written answers or answers that could not be converted into specific time frames. The remaining 3 287 respondents offered quantifiable data. These 3 287 responses were categorised into ranges based on the most commonly reported time frames. For respondents who had already provided their answers in ranges, those were directly used in our analysis. These ranges were considered when proposing the new standardised ranges, although it was not always possible to create exact matches due to variations in the reported ranges. For numeric answers that were not initially expressed as ranges, those were assigned to appropriate categories based on their reported values. The averages assigned to each range represent the midpoint. The quantification of the categorised data is presented in Table 1.

Table 1. Quantification of respondents indicating by decided time ranges

Range	Number	%	Average
1 to 2 working days	3 436	15.8	1.5
3 to 4 working days	4 891	22.4	3.5
5 to 6 working days	5 259	24.1	5.5
7 to 10 working days	920	4.2	8.5
10 to 15 working days	832	3.8	12.5
15 to 20 working days	453	2.1	17.5
20 to 25 working days	228	1.0	22.5
25 to 30 working days	305	1.4	27.5
30 to 50 working days	220	1.0	40
50 to 100 working days	239	1.1	75
100 to 200 working days	55	0.3	150
200+ working days	35	0.2	282.5
More than six working days (Blanks)	3 891	17.8	N/A
I don't know/ Not applicable	1 057	4.8	N/A

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

1.1.3.2. Sensitivity analysis

To ensure the robustness of the findings for Q12, a sensitivity analysis on the calculation of the median and average time respondents reported spending on administrative tasks related to CAP aid applications was conducted. This analysis involved systematically excluding certain ranges and responses to assess their impact on the overall results.

The sensitivity analysis was performed by progressively and cumulatively excluding higher time ranges and non-quantifiable responses, which could potentially skew the data due to their extreme values or lack of specificity. The steps taken were as follows:

1. Excluding non-quantifiable responses: 1 057 respondents were excluded who selected 'I don't know/Not applicable' to focus on those who provided specific time estimates. Additionally, 3 891 respondents who reported spending 'more than six working days' but did not provide quantifiable data to avoid the risk of overestimating or underestimating the results were excluded. It was not possible to estimate the distribution of these unquantifiable answers by extrapolating from existing data, as the analysis is conducted by country. The varying sample sizes across countries, with some being largely represented and others having few responses, made it impossible to replicate distributions reliably.
2. Cumulative exclusion of high time ranges: a series of cumulative exclusions, where each subsequent exclusion included all the previous ones was subsequently performed. Specifically, the following time ranges: 1) 200+ working days, 2) 100 to 200 working days, 3) 50 to 100 working days and 4) 30 to 50 working days categories were sequentially excluded.

At each stage, the median and average to observe how these exclusions influenced the results overall results (Table 2) and by country (Table 3) were recalculated.

The average estimate of seven working days spent on administrative tasks, as presented in the main report, is based on the following assumptions:

- Exclusion of respondents who indicated spending more than 100 working days on administrative tasks.
- Exclusion of respondents who did not provide specific information on the exact number of working days spent on administrative tasks when selecting the option 'more than six working days'.

Table 2. Sensitivity analysis on median, average and total respondents

Exclusion Step	Median (working days)	Average (working days)	Total respondents
After excluding 'I don't know/Not applicable' responses and non-quantifiable 'More than six working days' responses	3.5	8.0	16 873
After excluding the '200+ working days' range	3.5	7.5	16 838
After excluding the '100 to 200 working days' range	3.5	7	16 783
After excluding the '50 to 100 working days' range	3.5	6	16 544
After excluding the '30 to 50 working days' range	3.5	5.6	16 324

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Table 3. Sensitivity analysis on average working days by country

Average	AT	BE	BG	CY	CZ	DE	DK	EE	EL	ES	FI	FR	HR
Excluding NA + more than 6 (NA)	6.2	7.0	12.6	12.3	14.9	7.0	5.2	6.4	8.6	10.2	6.1	6.8	10.2
Excluding 200+	5.5	7.0	12.6	12.3	11.6	6.6	5.2	6.4	8.6	9.4	6.1	6.2	10.2
Excluding 100 to 200	5.5	6.4	11.5	12.3	11.6	6.2	5.2	6.4	8.6	8.6	6.1	6.0	9.6
Excluding 50 to 100	5.1	5.3	9.0	12.3	9.2	5.6	5.2	5.5	6.5	7.2	5.3	5.0	8.2
Excluding 30 to 50	4.9	5.0	8.2	6.7	8.0	5.2	4.4	5.0	6.5	6.5	4.9	4.8	7.5

Average	HU	IE	IT	LT	LU	LV	MT	NL	PL	PT	RO	SE	SI	SK
Excluding NA + more than 6 (NA)	8.6	6.7	8.9	12.2	6.6	8.1	15.4	6.2	8.2	7.0	11.3	5.8	5.0	14.8
Excluding 200+	7.7	5.6	8.1	12.2	6.6	8.1	15.4	6.2	8.2	6.3	11.3	3.5	5.0	14.8
Excluding 100 to 200	7.2	5.6	7.2	9.5	6.6	7.1	15.4	6.2	7.7	6.2	10.3	3.5	5.0	13.2
Excluding 50 to 100	5.7	5.1	6.1	7.9	5.2	6.6	3.5	6.0	6.7	5.4	7.9	3.5	5.0	11.2
Excluding 30 to 50	5.4	5.0	5.5	7.2	5.2	6.4	3.5	5.7	6.4	5.1	6.7	3.5	4.2	9.7

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

While country-level estimates of time spent by farmers on administrative tasks were not further analysed due to the limited number of responses in some countries across farm size categories, additional analysis to estimate the EU average time spent by farmers was conducted. By exploring different scenarios and adjusting certain assumptions, either strengthening or relaxing them, a plausible range of time spent was established. Table 5 provides an overview of these different scenarios and the corresponding EU level time estimates.

Below is a summary of the different procedures and assumptions considered:

1. **Farm size weighting**

   First, given the influence of farm size on the time reported by farmers (see section below), a weighted average by farm size was applied with data extracted from Eurostat [2] for this purpose. To calculate the weighted average time per farmer, the following approach was applied. The weighted average time per farmer is calculated by multiplying the number of respondents in each farm size category by the average time they reported and the weight of that category, summing up these values across all categories. This total is then divided by the sum of the number of respondents in each category multiplied by their respective weights, ensuring the estimate reflects the actual distribution of farm sizes in the population. Table 4 presents the average time spent on administrative tasks by farm size, along with the distribution of farms per size category.

Table 4. Average time spent on administrative tasks by farm size

Farm size	Average time spent on administrative tasks (EU level) [3]	Distribution of farms per size (EU level) (%)
N° land	5.47	1.40
Less than 5 ha	4.18	62.41
5-50 ha	5.66	28.74
51-100 ha	6.90	3.86
100 ha or over	9.48	3.60

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

2. **Adjustment of the upper time threshold**

   Subsequently, the impact of relaxing the threshold for including respondents who reported spending more than 100 working days on administrative tasks was explored. Alternative scenarios in which this assumption was modified to assess how including or excluding these high values would influence the EU average were also tested.

3. **Treatment of non-specified 'more than six working days' responses**

   A total of 3 891 respondents indicated spending 'more than six working days' on administrative tasks without specifying the exact number of days. To account for these responses when estimating the EU average time spent, the following two approaches were applied:

   - Assigning a fixed value of seven working days to these responses, as it is unlikely the actual value is significantly higher than six based on the assumption that respondents would likely have indicated a higher figure.
   - Redistributing these responses according to the observed distribution of working days among respondents who provided more precise estimates, thereby avoiding their exclusion while reflecting a plausible distribution of time spent.

4. **Adjustment based on full-time equivalent (FTE) workload**

   Similar to the relationship observed between farm size and time spent on administrative tasks, the number of FTEs on a farm also appears to influence reported time (see the section below for further details). Therefore, a stricter rule concerning the inclusion of certain responses was applied. Specifically, responses where more than 50% of total available FTE time was reported as being spent on administrative tasks were excluded, as such cases were considered implausible and risked distorting the overall estimates.

5. **Weighting by number of holdings by Member State**

   An additional EU level estimate was calculated by applying a weighting procedure based on the total number of agricultural holdings in each Member State. Under this approach, the calculated estimate for the average time spent on administrative tasks for each country was multiplied by the proportion of total EU holdings that the country represents. This method accounts for the varying sizes of national farming populations, giving more weight to countries with larger numbers of farms.

To illustrate the impact of the different procedures and assumptions applied, Table 5 below presents the various scenarios tested and their corresponding estimate of the EU average time spent on administrative tasks based on the responses from the TC.

2 Farm indicators by legal status of the holding, utilised agricultural area, type and economic size of the farm and NUTS 2 region [ef_m_farmleg__custom_15571012].
3 Average time based is calculated excluding responses indicating more than six working days but not specifying a specific estimate further and excluding responses indicating more than 100 working days.

Table 5. Overview of scenarios and corresponding estimates of time spent on administrative tasks (EU average)

Scenario	Farm size weighting	>100 days responses	'6+ days' no answer	FTE adjustment rule	Estimate EU average (working days)
Scenario 1	No	Excluded	Excluded	Not taken into account	7.01
Scenario 2	No	Excluded	Included – value of 7 days	Not taken into account	7.01
Scenario 3	No	Included	Applied distribution	Not taken into account	11.37
Scenario 4	Yes - farm size	Excluded	Excluded	Not taken into account	5.58
Scenario 5	Yes - farm size	Excluded	Included – value of 7 days	Not taken into account	5.77
Scenario 6	Yes - farm size	Included	Excluded	Not taken into account	6.24
Scenario 7	Yes - farm size	Included	Included – value of 7 days	Not taken into account	6.33
Scenario 8	Yes - farm size	Included	Applied distribution	Not taken into account	8.69
Scenario 9	Yes - farm size	Included	Excluded	Limited the time spent on administrative tasks to a maximum of 50% of the total time available per FTE.	6.1
Scenario 10	Yes - farm size	Included	Included – value of 7 days	Limited the time spent on administrative tasks to a maximum of 50% of the total time available per FTE.	6.22
Scenario 11	Yes - Number of farms per Member State	Excluded	Excluded	Not taking into account	8.45

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

1.1.3.3. Potential factors influencing the time spent by farmers on administrative tasks

Farm size

Table 6 presents the distribution of reported working days on administrative tasks across different farm size categories, showing how the number of reported working days varies with farm size. Smaller farms (less than 5 ha) have the highest proportion of respondents working only 1-2 days (38.7%), while this percentage decreases as farm size increases. In contrast, larger farms (more than 500 ha) have a higher proportion of respondents working more than six days on administrative tasks (67.5%), mid-sized farms (5-100 ha) display a more balanced distribution, with many respondents indicating spending 3-6 days on the administrative tasks.

Table 6. Distribution of indicated working days by farm size category (%)

	1 to 2 working days	3 to 4 working days	5 to 6 working days	More than 6 working days	I don't know/ Not applicable
N° land	25.5%	17.0%	17.0%	24.5%	16.0%
Less than 5 ha	38.7%	18.1%	13.6%	14.9%	14.7%
5-50 ha	20.9%	26.6%	24.1%	23.0%	5.5%
51-100 ha	11.9%	23.9%	27.1%	33.7%	3.4%
101-250 ha	8.8%	21.3%	26.2%	40.9%	2.8%
251-500 ha	5.6%	16.1%	24.6%	51.1%	2.6%
More than 500 ha	3.2%	7.3%	19.4%	67.5%	2.6%

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Full-time equivalents

The analysis reveals a relationship between the number of FTEs and the number of working days on administrative tasks reported. As FTEs increase, there is a shift towards more working days on administrative tasks, with 72% of respondents in the 'more than 21 FTEs' category working more than six days, compared to 27% in the '0 FTE' group. Mid-range FTE groups (3 to 10) show a gradual transition towards spending more days on administrative tasks, while lower FTEs (0 to 2) have a more even distribution across all working day categories. However, even among lower FTEs, a notable share (27-30%) still reports working more than six days on administrative tasks.

Table 7. Distribution of working days by FTEs (%)

FTE	1 to 2 working days	3 to 4 working days	5 to 6 working days	More than 6 working days	I don't know/ Not applicable
0	25%	21%	16%	27%	11%
0.5	26%	30%	19%	26%	0%
1	21%	23%	23%	27%	6%
2	16%	25%	25%	30%	4%
3 to 5	12%	22%	27%	36%	3%
6 to 10	8%	18%	24%	48%	2%
11 to 20	5%	11%	19%	62%	2%
More than 21	4%	6%	15%	72%	3%
Blank/not quantifiable	19%	22%	20%	25%	14%

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

To further explore whether longer time spent on administrative tasks (more than six working days) is associated with a larger workforce, the number of FTEs was analysed. Since the FTE information was provided as open-ended responses, these were cleaned and standardised by translating non-English responses and extracting numerical values. In cases where respondents reported both permanent employees and seasonal workers, only the permanent employees were counted to focus on the core, year-round workforce and avoid variability caused by seasonal employment. For those who provided a range of FTEs without further explanation, the lower number to potentially exclude seasonal workers was used. The results of this analysis are shown in Table 8.

Table 8. Time spent on administrative tasks by FTEs (more than six working days)

	Average FTEs	Median FTEs	Minimum	Maximum	Total respondents
7 to 10 working days	6.9	2.0	0	400	899
10 to 15 working days	5.1	2.0	0	215	810
15 to 20 working days	5.3	2.0	0	122	446
20 to 25 working days	8.0	3.0	0	300	225
25 to 30 working days	5.5	2.0	0	100	296
30 to 50 working days	5.6	3.0	0	80	216
50 to 100 working days	7.1	2.0	0	180	236
100 to 200 working days	6.5	3.0	1	80	53
200+ working days	10.1	2.5	0	90	34
More than 6 working days (Blanks)	6.0	2.0	0	550	3 770

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Farm type (activity)

To further characterise the administrative burden, responses based on the type of farming were analysed. This analysis includes only farmers engaged exclusively in one type of farming. The dataset comprises 6 599 farmers. The farming activities were categorised into five groups for analysis (Table 9). Table 10 shows the time spent by farmers exclusively involved in a single type of activity.

Table 9. Categorisation of farm activities

Main category	Farming activities
Field crops	Cereals
	Other field crops
Livestock	Beef
	Laying hens
	Milk
	Pigs
	Poultry meat
	Sheep and goats
Permanent crops	Wine
	Olive oil
	Other permanent crops
Horticulture	Horticulture, in greenhouses
	Horticulture, without greenhouses
Other	Apiculture
	Forestry
	Other

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Table 10. Number of responses by time spent on administrative tasks by farm activity

	Field crops	Livestock	Permanent crops	Horticulture	Other
1 to 2 working days	155	90	128	20	54
3 to 4 working days	836	536	359	51	87
5 to 6 working days	561	452	315	32	97
7 to 10 working days	104	66	55	5	8
10 to 15 working days	108	61	33	6	11
15 to 20 working days	51	40	19	4	7
20 to 25 working days	27	14	10	0	2
25 to 30 working days	38	28	16	4	5
30 to 50 working days	21	17	11	1	1
50 to 100 working days	23	20	10	2	3
100 to 200 working days	10	1	2	1	0
200+ working days	3	3	1	1	1
More than 6 working days (NA)	451	286	202	27	49
I don't know/Not applicable	377	370	412	53	143

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Reliance on external support (Q11 of the targeted consultation)

To assess the relationship between reliance on external support and the time spent on administrative tasks, the respondents' reported time spent with their corresponding reliance on external support categories, following the same time ranges specified above was cross-tabulated. The overall distribution of time spent on administrative tasks by reliance on external support is detailed in Table 11.

Table 11. Number of responses by time spent on administrative tasks and reliance on external support

Answering options	Yes, for all my CAP aid applications	Yes, for some CAP aid applications	N°
1 to 2 working days	1976	547	913
3 to 4 working days	2721	980	1190
5 to 6 working days	2984	1056	1219
7 to 10 working days	594	178	148
10 to 15 working days	544	155	133
15 to 20 working days	297	89	67
20 to 25 working days	139	52	37
25 to 30 working days	199	51	55
30 to 50 working days	148	39	33
50 to 100 working days	146	52	41
100 to 200 working days	33	10	12
200+ working days	22	8	5
More than 6 working days (NA)	2426	768	697
I don't know/ Not applicable	686	133	238

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

1.1.4. Q19 - Controls

The TC asked respondents to indicate the frequency of in-person farm inspections over the past three years (excluding certification checks) and the average time spent per inspection, including preparation and follow-up. Table 12 shows the findings.

Table 12. Frequency of farm inspections

Answering options	Number of respondents	%
Never	6 586	30%
Yes, once	7 933	36%
Yes, twice	3 843	18%
Yes, 3 times or more	3 459	16%
Total	21 821	100%

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Of the 15 064 respondents who reported being inspected, 2 557 who selected 'More than two working days' were excluded from the analysis as they did not provide specific information that could be consistently quantified. Table 13 presents the overall average time spent on inspections and Table 14 shows the average time by country, excluding respondents indicating 'More than two working days'.

Table 13. Number of responses by time spent on a single inspection

Answering options	Number of respondents	%
More than 2 working days	2 557	17%
Up to 2 working days	3 202	21%
Up to 1 working day	4 857	32%
Up to half a working day	4 448	30%
Total	15 064	100%

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Table 14. Time spent on a single inspection by country: Number of respondents ordered by average time spent (decreasing order)

Member State	Up to two working days	Up to half a working day	Up to one working day	Average time
SK	55	25	61	1.3
RO	41	21	45	1.3
FI	75	44	89	1.3
LU	13	8	18	1.2
CZ	59	47	75	1.2
PL	168	149	164	1.2
BG	38	30	55	1.2
GR	9	9	14	1.1
FR	375	420	511	1.1
AT	342	379	569	1.1
DE	662	756	1 021	1.1
SE	22	27	48	1.1
ES	592	821	863	1.1
IE	58	90	55	1.1
NL	52	78	97	1.1
BE	58	89	113	1.1
EE	17	28	30	1.0
LT	66	111	112	1.0
HR	45	84	75	1.0
IT	100	202	202	1.0
HU	129	278	181	1.0
SI	8	18	17	1.0
LV	28	72	54	0.9
CY	1	3	2	0.9
PT	180	595	367	0.9
DK	9	60	18	0.8
MT	0	4	1	0.6

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

1.2. Labour costs and total costs of administrative burden for farmers

Using the information from the TC, it was possible to quantify the administrative burden for farmers in the sample. The analysis differentiates between:

1. Internal costs, that is the value of the time spent by farmers, their families and employees on administrative tasks (Q12).
2. External costs, i.e. costs for externalised services that help to prepare and submit the CAP aid application (Q11).

After conducting the sensitivity analysis and examining the potential factors influencing the number of days spent on administrative tasks, the responses reporting more than 100 days as potential outliers were excluded. This was done in addition to excluding 'I don't know/Not applicable' responses and non-quantifiable answers where more than six working days were reported. As a result, from a total of **16 873 quantifiable responses**, **16 786** (i.e. excluding 87 responses) were retained. This approach ensures that the average time spent on administrative tasks reflects a more accurate measure and prevents skewed results.

To estimate the internal costs of administrative burden, the FADN data on paid labour input and wages was. Specifically, the hourly wages per country from 2021 and 2022 were applied. These costs were expressed in 2023 values by adjusting for inflation using Eurostat's harmonised index of consumer prices (HICP) [4]. The adjusted wage rates were then multiplied by the amount of time reported by farmers during the consultation to calculate the total internal costs.

For external costs, farmers were asked whether they used outside help to prepare and submit their CAP aid applications for 2023. If applicable, they provided details on who offered the service, and the costs incurred for the annual CAP aid application, investment CAP aid, or other CAP aid applications. The costs provided by farmers in local currency were converted into euros for comparison purposes.

Once internal and external costs were calculated, these indicators were incorporated into an adjusted standard cost model presented below, where the costs (C) for a farmer (F) are the product of the time (T) the farmer spends and the average national labour cost (L) according to FADN data, plus lump sums for expenses (E) such as external assistance:

$$C_F = T_F \times L_{MS} + E_F$$

Internal costs

To calculate internal costs, we used predefined time ranges and excluded responses reporting more than 100 working days and non-quantifiable responses. After adjusting for inflation using Eurostat's HICP for each country, the estimates for the average annual cost of administrative burden in euro were calculated by multiplying the adjusted hourly wages by the reported time spent on administrative tasks. Table 15 reflects the average internal cost per farmer by country.

Table 15. Average annual labour costs reported per farmer by country (ascending order)

Member State	EUR/year (average)
RO	255
SI	292
EL	314
PT	331
PL	351
CY	398
HU	408
BG	446
LV	460
HR	485
LT	616
EE	621
IE	621
IT	647
AT	665
SE	696
ES	704
BE	730
FR	783
LU	862
MT	900
FI	901
DE	933
NL	1 076
CZ	1 174
DK	1 200
SK	1 299
EU-27	**627**

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

4 See more at: https://ec.europa.eu/eurostat/web/hicp.

If the different scenarios are considered, the EU estimates for internal costs range from **EUR 499.51** to **EUR 1 017.82**. This variation is influenced by the different scenarios in Table 5, which incorporate factors such as farm size weighting, the handling of responses over 100 days, the inclusion of a "6+ days" no-answer value, and adjustments based on FTE rules. These factors and the corresponding administrative time estimates directly impact the internal cost calculations, highlighting the sensitivity of both cost and time estimates to varying assumptions and conditions.

External costs

To calculate internal costs, we cleaned and standardised the costs the farmers specified (see Section 1.1.2). Non-quantifiable responses and blank entries were excluded, while zero-cost entries were retained to account for free or subsidised services. After converting the costs from their local currency to euro, the average annual external cost by country was calculated. Table 16 reflects the average external cost per farmer by country.

Table 16. Average total advisory costs reported per farmer by country (ascending order)

Member State	Total advisory costs per country (average) (EUR)	Member State	Total advisory costs per country (average) (EUR)
AT	167	PL	813
RO	193	IE	819
LV	297	EE	840
FI	309	EL	957
LU	334	CY	1 000
HR	359	PT	1 051
HU	375	CZ	1 075
DE	391	IT	1 276
FR	425	NL	1 299
ES	522	DK	1 425
SI	533	SK [5]	1 443
SE	655	MT	1 687
BG	704	LT [6]	1 724
BE	735	**EU-27**	**601**

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

5 For Slovakia, the average amount of external cost is calculated on the responses of 181 farmers.
6 For Lithuania, the average amount of external costs is calculated on the responses of 236 farmers.

Total costs

To calculate the total costs, the internal and external costs provided in the table above were summed up. Refer to Table 17 to have an overview of the estimated cost of administrative burden for a farmer in each Member State.

Table 17. Administrative burden: average cost per farmer by country (ascending order)

Member State	Total costs per country (average) (EUR)	Member State	Total costs per country (average) (EUR)
RO	448	SE	1 351
LV	757	PT	1 382
HU	783	CY	1 398
SI	825	IE	1 441
AT	832	EE	1 461
HR	844	BE	1 465
BG	1 150	IT	1 923
PL	1 164	CZ	2 248
LU	1 196	LT	2 340
FR	1 208	NL	2 375
FI	1 210	MT	2 587
ES	1 226	DK	2 625
EL	1 271	SK	2 741
DE	1 324	**EU-27**	**1 227**

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Considering the different scenarios in Table 5, the EU estimates for total costs range from EUR 1 100.38 to EUR 1 618.69. These variations are driven by factors such as farm size weighting, the treatment of responses over 100 days, the inclusion of the '6+ days' no-answer value and FTE adjustments. These factors, along with the corresponding administrative time, directly impact the total cost calculations, highlighting the sensitivity of the estimates to varying assumptions and conditions.

1.3. Farmer interviews

In the first part of the study, 298 interviews with farmers were conducted. Within these interviews, the farmers provided more insights into the division of the time spent on the different administrative tasks. More specifically, Q7 asked about the time spent on the following tasks:

1. Preparatory work: gathering information on the available schemes, their requirements and the aid application process.
2. Collecting and recording the necessary information/supporting evidence.
3. Filling in the application: filing in the actual aid application form(s).
4. Preparing documents related to compliance with conditionality.
5. Anything else.

The following approach was employed to estimate the time farmers spend on administrative tasks at different stages. First, each time range was assigned a midpoint value to represent the average time within that range. For instance, 'More than four working days' was conservatively assigned five days, '3 to 4 working days' was represented by 3.5 days, and so forth, with 'None' equating to zero days. These midpoint values allowed the standardised categorical response into quantifiable data.

Next, the frequency of responses within each time range was multiplied by the assigned midpoint value, weighting each category by the number of respondents who reported that time range. This step provided a total estimated time contribution for each category.

To ensure accuracy, 'Unable to quantify', 'Missing', and 'N/A' responses were excluded from the analysis, as they do not provide usable time estimates. Once the weighted values for all valid categories were calculated, they were summed to determine the total time spent by all respondents on the given activity. Finally, the total time was divided by the number of valid responses (except excluded categories) to compute the average time spent for each activity. Table 18 reports the average time spent per activity.

Table 18. Time spent per activity

Activity	Nº. valid responses	Total days	Average days
Preparatory work	153	321.5	2.1
Collecting information	152	275.5	1.8
Filling the application	142	115.5	0.8
Preparing compliance documents	67	75.5	1.1

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Since the sample size of the interviews is significantly smaller than the TC, these data can indicate the distribution of time across the different activities rather than an estimation of the average time spent by farmers on administrative tasks. Refer to Section 2 for the calculation approach.

4. Administrative burden arising from the 2023-2027 CAP for other beneficiaries

The five surveys targeting other CAP beneficiaries (wine growers and producers, producer organisations in the fruit and vegetable sector, Local Action Groups, EIP Operational Groups, and advisory services) were processed as described below to ensure the accuracy and reliability of the data. This included handling duplicated responses and addressing outliers.

Treatment of duplicated responses

The duplicated responses, where the same individual submitted more than one survey were carefully reviewed. If duplicates contained different responses, all entries were discarded. In cases where duplicates had identical responses, only one entry was retained. Similarly, the completed entry was kept if a duplicate included one empty and one completed response. Refer to the table below to see the number of responses per survey after the exclusion of duplicate entries.

Table 19. Number of responses per survey

Type of beneficiary	N°. (valid responses)
Wine growers and producers	194
Producer Organisations in the fruit and vegetable sector	67
Local Action Groups (LAGs)	381
EIP Operational Groups	34
Advisory services	212

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data

Outlier identification and exclusion

In some questions, the respondents were asked how many days they spent on the completion of administrative tasks or the costs of external services that provided help with the administrative tasks.

These questions, in which respondents reported amounts, days or costs were systematically checked for outliers, particularly for questions regarding the number of days spent on the different administrative tasks linked to a specific type of intervention for each type of beneficiaries. Outliers were identified by making use of graphical representations such as boxplots. In addition, any negative values reported for the number of days were considered invalid and removed.

Outliers were excluded to prevent skewed results, as the limited number of survey responses made individual outliers significantly impactful. Additionally, when a respondent reported outlier values for days spent on administrative tasks during the application phase, their responses for the follow-up phase were also excluded to maintain accuracy. The same approach was applied consistently across all five surveys.

Upper limits for external advice costs

An upper limit was set for the amount spent on external advice to filter out excessively high values. For the survey targeting wine growers and producers, the limit was set at EUR 10 000, consistent with the range used to estimate the cost of external advice service by farmers (refer to Section 1.1.2). For other beneficiaries, the upper limits were adjusted to reflect the unique characteristics of their operational structures.

Limitations to estimate the administrative burden for other beneficiaries

The estimation of the administrative burden arising from the CAP 2023-2027 for other beneficiaries is subject to several limitations. A key challenge is the uneven representation of Member States in the survey responses. This imbalance makes it difficult to provide country-specific estimates that are truly representative of this specific Member State. Monetising the administrative burden at country level under these conditions would lack reliability.

Alternatively, using an EU-wide average for monetisation is also not ideal. While the average hourly labour cost in the EU was estimated at EUR 31.8 in 2023 (EUR 35.6 in the euro area), these figures have significant disparities between the Member States. For instance, Luxembourg reported the highest average hourly labour cost at EUR 53.9, while Bulgaria reported the lowest at EUR 9.3 [7]. Such variations mean that applying a single EU average would fail to reflect the actual administrative burden experienced by beneficiaries in individual Member States.

For this reason, the findings are presented as aggregated insights rather than estimates on the administrative costs arising from the 2023-2027 CAP application.

7 See more at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Hourly_labour_costs.

ANNEX IV. Challenges related to compliance with conditionality and other environmental and sanitary requirements. Detailed information from data collection

The sections below detail the challenges farmers face in complying with conditionality and other environmental and sanitary requirements, based on information collected through interviews with farmers and interviews with MAs, PAs, and other Member State stakeholders. The presentation of findings is organised by the frequency with which the different elements are mentioned.

Citations and examples gathered from farmers are complemented and reinforced by information collected among national CAP Strategic Plan (CSP) authorities and stakeholders.

GAEC 8 – Cited by 77 interviewees (biodiversity and landscape)

Cited by 77 farmers and 26 CSP MA/PAs and stakeholders.

The GAEC 8 standard, as outlined in Regulation (EU) 2021/2115, aims to improve on-farm biodiversity and consists of three compulsory and one optional requirement:

1. Minimum share of agricultural area devoted to non-productive areas or features. A proportion of the farmer's arable land must be dedicated to non-productive areas and features (e.g. cairns, ditches, field margins). Member States had three different options to implement GAEC 8 requirements:
    a. At least 4% of arable land at farm level must be devoted to non-productive areas and features, including land lying fallow (adopted by all Member States)
    b. Farmers commit to devoting at least 7% of arable land to non-productive areas and features, including land lying fallow, under an 'enhanced' eco-scheme; under this option, the share to be attributed to compliance with the GAEC is limited to 3%
    c. A minimum share of at least 7% of arable land at farm level if this includes also catch crops or nitrogen-fixing crops, cultivated without the use of plant protection products, of which 3% must be land lying fallow or non-productive features.
2. Retention of landscape features.
3. Ban on cutting hedges and trees during bird breeding and rearing season.
4. Optional measures for avoiding invasive plant species.

It must be noted that the adopted targeted review of the CAP acknowledges the financial burden that the requirement to maintain a minimum share of agricultural area devoted to non-productive areas or features placed on farmers is intensified by adverse events and economic uncertainties. Consequently, the specific obligation to allocate arable land to non-productive areas has been removed from the GAEC 8 standard. The requirements to retain landscape features and protect hedges and trees during bird breeding seasons will remain to ensure biodiversity protection. At the time the interviews in the scope of this study had been performed, this change had not taken place. The views of farmers on this aspect are illustrated below.

In the interviews, farmers expressed their concerns about the **economic impact** (mentioned in 25 out of 77 interviews that discussed this GAEC) of complying with the GAEC 8 standard. Farmers reported a possible decline in income, reduced yields, and increased costs due to farm operations to revert the land to productive status. To a large extent, interviewed farmers mentioned the requirement to leave fallow land in this regard. Specifically, farmers perceive the designation of unproductive areas as particularly burdensome, even though this aspect of the GAEC has now been removed from the standard (see above). This appears to be problematic when any reduction in the cultivated surface would strain the internal feed supply needed for livestock in mixed-system farms. In an illustrative example, a Hungarian farmer suggested that the requirement of maintaining 4% non-productive agricultural land would pose a significant challenge to the supply of fodder to their livestock, which they rely on for their livestock production. Additionally, farmers indicate that leaving fallow land might be counterproductive in relation to soil quality and that returning the land to required productivity levels would involve high costs in farm operations. To this end, a Bulgarian farmer indicated the additional cost of EUR 3 500 to EUR 4 000 to plough 6 ha of fallow land and revert it back to its productive status. The economic impact appears to be further exacerbated when land is rented rather than owned, as farmers are asked to rent land without profiting from it.

The **clarity of the legal requirements** (mentioned in 20 out of 77 interviews) linked to this provision is also perceived as a major cause of concern for respondents. Some farmers criticised the new requirement, stating that it was communicated very late. According to farmers, this made it difficult for them to prepare for the upcoming crop season. Replies suggest that frequent changes to the requirement increased these uncertainties further and undermined the understanding of the expectations and the rationale behind the requirements. Farmers indicated that even after consulting authorities, many uncertainties remained.

Interviews with CSP MAs/PAs and other national stakeholders confirmed clarity issues in several countries (e.g. CY, LU, SK) also in relation to the definition and identification of non-productive areas (e.g. BE-WA, IE, RO). An Irish representative of a farmer organisation stated that 4% fallow land is not, in principle, difficult to comply with for Irish farms, but it became challenging when high ecological value areas such as forestry, commonages and Natura 2000 sites were excluded from calculations.

Possible overlaps with other requirements have been mentioned with respect to this GAEC standard. A Dutch farmer highlighted that other requirements targeting nature conservation areas rendered the requirement of GAEC 8 redundant and not justified considering its potential benefits. Similarly, in Slovakia, a farmer stated that national regulations on the maintenance of non-productive areas in ecological farming place an additional burden on farmers. Finally, the choice of specific landscape features is considered to be difficult. One farmer mentioned that this difficulty persisted even after consulting with farm advisors.

In addition, 14 (out of 77) farmers were concerned that the requirements of this GEAC might impact their **farm management operations**. Respondents claimed that setting bans for cutting trees and hedges during certain periods univocally, as defined in the CSPs of the Member States, would not allow for sufficient flexibility in case of unexpected weather conditions and to accommodate agronomic practices. A farmer in Austria reported that the ban could force changes to the mowing schedule, which may not be practical in some cases. In his example, grass would be left unharvested for too long, causing it to become woody and unsuitable for fodder. Similarly, compliance with these seasonal bans is seen as a challenge due to the unpredictability of weather conditions, which may prevent the timely pruning of hedges and trees.

With respect to the retention of fallow land, a farmer mentioned that the alteration of the plot structure may cause challenges in utilising large-scale machinery [8]. Farmers and CSP MAs/PAs and stakeholders (Czechia) also consider managing invasive species on set-aside lands as particularly challenging. They pointed out that these areas become more vulnerable to infestations because of weeds and difficulty controlling dangerous and alien species on fallow land. According to one farmer, the difficulties in managing weeds linked to the set-aside could have further spillover effects on other aspects of the CAP payments. In fact, this could hamper the visibility and, hence, identification of parcels via aerial photographs, which is the basis for claiming CAP payments.

Farmers also highlighted several **context-specific aspects** (mentioned in 11 out of 77 interviews) which may result in challenges to comply with GAEC 8. In terms of land planning, maintaining a minimum share of non-productive areas is seen as particularly problematic by farmers in countries with limited arable land, such as Slovenia, compared to other EU countries with more arable land per capita. In these countries, arable land is scarce, and setting aside non-productive areas is viewed as a threat to food and feed supplies.

Farm size and layout, such as the prevalence of small, scattered plots typical in countries like Cyprus, pose obstacles to complying with GAEC 8, according to farmers in these countries. This may result in difficulties calculating and identifying the land to set aside for fallow requirements across different parcels. The diverse parcel sizes also complicate compliance with crop rotation requirements, making it hard to plan rotations and leave land fallow simultaneously. The results of the interviews indicate that mountain areas and regions with many small-scale landscapes, such as embankments and ravines, already include elements that promote biodiversity. Thus, additional biodiversity measures may be unnecessary. While no specific soil or climatic constraints were noted, some farmers expressed concerns about a potential soil quality decline in land left idle due to set-aside requirements.

Some CSP MAs/PAs and stakeholders did mention that GAEC 8 has been simplified removing the main sources of complexity. However, a Danish representative of a farmer organisation argued that this rule is still implemented in the country. In Slovakia, one respondent claimed that the complexity of this requirement had been further increased through the implementation of rules at the national level.

Finally, no explicit references to **administrative burden** linked to GAEC 8 were made. However, the perceived complexity and lack of clarity in the legal requirements might indirectly contribute to this issue. This suggests that the main challenge for farmers in complying with GAEC 8 is not administrative burden but the practical difficulties and lost income due to the set-aside requirements.

Burdensome planning, measurement and recording of fallow land was mentioned by CSP MAs/PAs and other national stakeholders in BE-WA and SK.

GAEC 6 - Cited by 58 interviewees

Cited by 58 farmers and 15 CSP MA/PAs and other national stakeholders in 11 Member States.

GAEC 6, as outlined in Regulation (EU) 2021/2115, **mandates minimum soil cover to prevent bare soil during the most sensitive periods**. The standard emphasises avoiding bare soil. Twenty-three Member States set requirements for 80% to 100% of soil cover during sensitive periods. Six Member States [9] adapted these requirements due to shorter vegetation periods and specific agronomic practices, setting soil cover for 30% to 70% of the arable land. Special rules for fallow land and permanent crops are also included in selected CSPs. Twenty-three Member States set specific requirements for permanent crop areas. Farmers usually have the flexibility to achieve the mandated soil cover through various methods, such as sowing crops, leaving stubble, crop residues or mulching [10].

Similarly to GAEC 8, GAEC 6 also underwent a recent amendment [11], which grants Member States greater flexibility in determining which soils are to be protected in each season based on national and regional specificities. These recent changes acknowledge that compliance with GAEC 6 is influenced by a broader range of factors compared to other GAECs. These factors include the duration of the growing season, crop choices and specific soil and climatic conditions. As a result, these different conditions might result in different sensitive periods. Similarly to GAEC 8, those changes were not yet in place at the time of the interviews.

8 Note, however, that also this requirement has now been lifted.
9 EE, LV, LT, FI and SE.
10 European Commission. (2023). Approved 28 CAP strategic plans 2023-27. https://agriculture.ec.europa.eu/cap-my-country/cap-my-country/cap-my-country/cap-strategic-plans_en.
11 Commission Regulation (EU) 2024/1468 of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental conditions standards, schemes for climate, environment and animal welfare, amendment of the CAP Strategic Plans, review of the CAP Strategic Plans, and exemptions from controls and penalties.

Consequently, farmers identified a lack of flexibility to adapt to local conditions, including soil and weather, as their biggest concern for GAEC 6. Related concerns were expressed by 37 out of 58 interviews that discussed this GAEC. Several farmers from Greece, Poland and the Netherlands noted that GAEC 6 requirements fail to consider specific soil conditions prevalent in their regions. They stressed that the requirement should be more flexible to accommodate the diverse soil profiles and types of farming practices in different areas. For example, two Polish farmers mentioned that maintaining cover crops on heavy clay soils during winter would be highly impractical, e.g. due to difficulties accessing the plots. This could lower the yields of spring cereals planted after ploughing in the spring. Similarly, a Cypriot farmer noted a need for greater flexibility in compliance with the GAEC to align with their unique soil conditions.

Closely linked to soil and landscape conditions, respondents from Ireland, Poland, Bulgaria and Wallonia in Belgium reported that GAEC 6 would not align with local weather conditions. Two Bulgarian farmers pointed out that the sensitive period stipulated by GAEC 6 would not match Bulgaria's climatic patterns. They specifically mentioned the ban on ploughing until 15 February [12] compels them to "push forward" the sowing operation to March. This change in the sowing schedule shortens the available time window and exposes farms to adverse climate conditions typically present during spring. Similarly, farmers in Wallonia reported difficulties aligning their planting and sowing calendar with the requirements prescribed by GAEC 6. In their replies, they stated that when complying with the sensitive period prescribed by this GAEC, they are more likely to encounter frozen soil during their operations.

Farmers frequently highlighted the impact of compliance on their **farm management operations**, as mentioned in 29 out of 58 interviews. This is mainly related to the impact on the timing of farm operations, as already discussed in the section above on context specifics. Fourteen farmers indicated that meeting the specified deadlines is challenging. Additionally, a farmer mentioned that the ban on ploughing arable land makes it difficult to control weeds, which may lead to an increased application of pesticides. Furthermore, according to a Romanian respondent, specific equipment and machinery are needed to comply with this GAEC (e.g. machinery for minimum tillage), which points towards the increased use of diesel and the associated costs.

This leads to the third most frequently mentioned category in the interviews related to GAEC 6 compliance: **the economic impacts**, which were noted in 17 out of the 58 interviews. While additional equipment costs were stressed frequently, a farmer also highlighted the need to purchase productive inputs (e.g. seeds for cover crops) to ensure soil cover during the sensitive period, which is, however, not necessarily linked to productive output.

The **clarity of legal requirements** related to GAEC 6 was another significant concern for farmers, as mentioned in 14 out of the 58 interviews. It should be noted, however, that references to the clarity of legal requirements often remain quite general. While they may be mentioned in relation to a specific GAEC, they typically reflect broader concerns for farmers regarding the entire compliance system. With respect to this standard, according to an Irish farmer, the specific percentage of land to devote to cover crops under this GAEC remains unclear, while a Czech farmer stated that the rules of the GAEC 6 standard are difficult to understand. On a more general level, farmers from Germany expressed their frustration over constantly changing requirements, which they claim makes it difficult for them to remain sufficiently informed and compliant. In Spain, a farmer needed to seek additional explanations from the administration on how to comply with this standard.

Interviews with national stakeholders reflect the issues raised by farmers, in particular the requirement's poor flexibility in relation to different sensitive periods and farming conditions (e.g. dry soils in Malta, heavy soils in Austria, climate in Greece and orography in Slovakia). An Austrian representative of the chamber of agriculture explained the benefits of ploughing on heavy soils in autumn after harvesting the main crop (better air/heat balance, increased water storage capacity) compared to spring.

In some cases, problems arose from the specific adaptation of the rule at national level. In Ireland, the CSP requirement of providing for an 'adequate lye back area' for catch crops was transposed in an excessively burdensome threshold within the implementation guideline that negatively impacted on store lamb trade. Austria has first imposed strict soil cover rules and then foreseen a number of exceptions that have reportedly made the requirement even more complicated.

As mentioned above, GAEC 6 has been simplified and interviewees who flagged it mainly referred to the first year of CAP implementation. However, two Austrian respondents argued that the European Commission has not yet allowed revisions to the CSP that will simplify the requirement.

GAEC 7 – Cited by 52 interviewees

Cited by 52 farmers and 28 CSP MA/PAs and stakeholders.

The primary objective of GAEC standard 7, as outlined in Annex III of Regulation (EU) 2021/2115, is to **preserve soil organic matter content through crop diversification**. This GAEC standard, which excludes crops grown underwater, such as rice, is featured in all the CSPs. Most plans ensure significant annual crop changes on arable land. Almost all require a main crop change at least every three years. Additionally, 23 CSPs include secondary crops in the rotation, and three Member States require crop diversification for specific regions. Thirteen Member States adapted requirements for particular farming systems and crops, while all Member States provide exemptions for farms with significant grassland or small-scale farms. Organic farms are deemed compliant. Notably, following the recent targeted review [13] of the CAP, Member States are now able to allow farmers to comply with GAEC 7 through crop diversification. This recognises that crop diversification can also contribute to preserving soil potential and may be simpler for certain farmers to implement amidst the multiple pressures and challenges the farmers face.

12 The Bulgaria CSP prescribes that, in the case of areas with a gradient of ≥ 10%, a minimum soil cover must be maintained on at least 80% of the total arable area of the holding from 1 November to 15 February.

13 Commission Regulation (EU) 2024/1468 of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental conditions, schemes for climate, environment and animal welfare, amendment of the CAP Strategic Plans, review of the CAP Strategic Plans, and exemptions from controls and penalties.

Although farmers usually referred to this GAEC as crop rotation, they did not clearly differentiate between crop diversification and rotation in their replies, suggesting that the challenges met are similar across the two types of mechanism. Similarly to GAEC 6, interview findings indicate that the main difficulties in complying with GAEC 7 arise from the impact on farm management practices and contextual specificities that create barriers to compliance.

Some interview respondents in Member States acknowledged the positive effect of revisions but one of them argued that the simplification package came during the application stage, impacting farmers' planning and generating confusion.

With respect to the impact on **farm management operations** (mentioned in 41 out of 52 interviews), farmers generally advocated for more flexible rules to accommodate diverse farming practices. Farmers from different cropping systems, e.g. arable versus horticultural crops, show different views on the requirements of this GAEC. Farmers growing arable crops, such as corn, grain or grass, usually express reservations about having to change the crops every three years. In Flanders, a farmer highlighted that the obligation of changing the main crop at least every three years may be logistically challenging, especially in case of adverse weather conditions at the time of introducing a new crop. For example, a farmer mentioned that they faced unfavourable weather conditions, such as excessive rainfall, when they had to introduce a new crop (grain after three years of maize), de facto making it impossible to comply with the crop rotation requirement.

Moreover, farmers appeared concerned that the requirement to rotate crops may compel them to introduce crops not ideally suited to local conditions. This issue arises particularly when the selection of available crops for specific times of the year, such as winter crops, is limited in certain geographical regions. Consequently, farmers feel compelled to select and cultivate crops that are not optimal for their environment or farming practices. For instance, farmers from Flanders and the Netherlands pointed out that incorporating potatoes into a rotation with grass and maize – which are the primary crops in their area – could lead to the build-up of nitrate residues in the soil. This is perceived as problematic, as it can compromise soil health and pose challenges in adhering to other environmental regulations, such as those related to nitrate levels. However, farmers growing horticultural crops are already alternating crops throughout the year due to their short growing cycles. In one case, a Dutch farmer criticised the requirement to grow different main crops every four years per plot. They advocated recognising intra-year crop rotations to better preserve soil quality and align with horticultural farming.

Respondents across various regions, e.g. in Germany and Flanders, also reported on increased workload and logistical challenges associated with complying with GAEC 7. For instance, a German farmer mentioned that requirements on crop diversification would increase the efforts for soil monitoring (e.g., the number of soil samples that would be higher when multiple crops are grown on the farm), the purchase of inputs (i.e. fertilisers) and the overall complexity of farm management.

Several farmers mentioned **contextual-specific aspects** (22 out of 52 interviews) in relation to this GAEC. Here, farmers stated that the specific soil, weather, farm size and layout add complexity to complying with this requirement. Farmers often mentioned that they acknowledge the benefits of crop rotation on soil quality and overall productivity. Yet, they would rather design their own rotation patterns according to the local conditions and their farming system. Farmers with small farms and scattered parcels perceived the three-crop requirement as more difficult to adhere to. According to small-scale farmers in countries like Bulgaria and Poland, it creates difficulties in implementing diversification or rotation due to fragmented land parcels. In Romania, four respondents face challenges in complying with this GAEC due to the specificities of their farms, including the level of fragmentation and difficult terrain. Similarly, in France, a farmer pointed out that larger farms might find it easier to comply with the GAEC due to their scale. Some of the reasons mentioned by respondents include logistical complexities, increased costs, and the added burden of managing diverse crops across various locations. This requires, according to respondents, additional travel and resources, significantly increasing the complexity of farming operations.

As in many instances, respondents did not differentiate between crop rotation and crop diversification, it seems that both options pose similar challenges. However, the three-crops rule is mentioned more often in replies, especially among small farms. Moreover, those concerns are often mentioned in relation to multiple GAECs, suggesting that farmers operating on small and/or scattered plots generally experience more difficulties in complying with the GAEC standard.

Interviews with CSP MAs/PAs and stakeholders in Member States confirm concerns about the adaptability of crop rotation in agricultural systems dominated by small farms (PT, SK), fragmented holdings (EL) or rented land (CY).

Building on these aspects, the **economic impact** of complying with GAEC 7 has been mentioned in 16 out of 52 interviews. This is often linked to the consequence of other aspects mentioned in the sections above i.e. context-specific characteristics that lead to higher management costs (increased intensity in farm operations) and lower profitability (introduction of less profitable crops in the rotation). In Cyprus, a respondent stated that the low levels of soil organic matter and the water shortage, typical of its territory, limit the choice of profitable crops to rotate, leading to potential income drops.

Finally, the **clarity of legal requirements** has been mentioned as a source of concern in 11 out of 52 interviews, although related remarks remain rather general. Similarly, with other GAECs, numerous respondents stated that understanding the rules and keeping up with updates is challenging, leading to confusion and potential misinterpretation. For instance, in Germany, a farmer indicated that the rules had been altered by the time the farmer got fully acquainted with them.

According to several CSP MAs/PAs and other stakeholders, GAEC 7 is challenging for both farmers and authorities. Difficulty in understanding and implementing this standard was mentioned in BE-FL, CY, FR, IE, PT and SI.

GAEC 4

Cited by 35 farmers and 13 interviewees at Member State level in AT, BE-WA, DE, FR, HU, LT, LU, LV and SI (three citations).

GAEC 4 aims to enhance the **protection of river courses against pollution and run-off**. It requires farmers to establish a 'buffer strip' of a width of at least three metres where fertilisers and plant protection products cannot be applied. Member States have the option to set a wider minimum width or require wider strips for specific situations or types of water courses. Nine CSPs [14] have implemented buffer widths greater than three metres.

During the interviews, the main concern with this GAEC was the complexity and lack of **clarity in the legal requirements**, as noted in 24 out of 35 interviews. Respondents from several countries, including BE, ES, FR and LT, found GAEC 4 particularly unclear and complicated. A key example is the varying requirements for the buffer strip width. An Irish farmer explained that establishing these strips is challenging due to different margin rules: three metres from drains, four metres if livestock is present and six metres for specific crops. A farmer from Flanders mentioned that the various types of buffer strips and their specific maintenance tasks, including mowing schedules, make compliance difficult. A Spanish farmer was uncertain whether only permanent watercourses are included in GAEC 4, while a Slovenian farmer found it unclear which plant protection methods are allowed within the buffer strips. In Latvia, a farmer highlighted inconsistencies in the interpretation of rules by enforcement authorities. For Austrian national stakeholders, there is no clear definition of polluted water bodies.

Challenges related to measuring the distance from watercourses for buffer strips were highlighted, such as different distance requirements for rivers and other water streams. According to a Dutch farmer, the complexity is often increased by inaccuracies in digital mapping tools, which frequently misrepresent the width of ditches. This makes it difficult to determine the correct areas for buffer strips. Generally, the exact protocol for measuring the distance from watercourses appears unclear to farmers. For instance, a Lithuanian farmer mentioned that it is not clear whether the measurement should be taken from the middle of the watercourse or the shore. They suggested that providing clear maps indicating where tillage is not allowed would be very helpful, as it would make it easier for farmers to comply with the rules and for authorities to conduct inspections. Additionally, a Finnish farmer mentioned that parcels next to water bodies are often partially underwater, depending on water levels, making it difficult to measure and establish buffer strips as the water level changes over time. Difficulty with map drawing (i.e. errors, uncertainty about how to measure the buffer strip, frustration about inflexible enforcement of the rule) were also highlighted during interviews with CSP MAs/PAs and stakeholders in AT, HU and LU.

The second aspect mentioned by farmers in 12 out of 35 interviews (and confirmed by national stakeholders interviewed in HU and BE-WA) concerns the **economic impact** of complying with GAEC 4. These negative impacts are driven by productivity losses and the reduction of cultivable land. Two Hungarian farmers specifically attributed productivity losses to the limited possibility of using pesticides in the buffer strips, which might negatively impact yields. This becomes particularly significant when large portions of agricultural lands are located close to water flows, thus implying that pesticides cannot be used on a significant portion of land.

Three farmers from Slovenia, the Netherlands and Flanders in Belgium expressed concerns about setting aside land for buffer strips, which reduces the area available for cultivation and negatively impacts productivity. Additionally, Dutch and Belgian respondents noted that this reduction in arable land, along with high land costs, creates economic challenges. The Dutch farmer also highlighted income loss due to inadequate compensation for buffer strips, adding to the financial burden of compliance.

In nine out of 35 interviews, farmers discussed challenges related to **farm management operations** while complying with GAEC 4. An Austrian farmer mentioned that the use of machinery can sometimes lead to errors, such as inadvertently spreading or working 50 cm too far into the buffer strip. A Dutch farmer noted that the ban on pesticides in buffer strips could lead to the excessive growth of unwanted weeds, acting as a 'pool' that can be spread in areas outside the buffer strips. Additionally, a Dutch farmer expressed concerns about the ban on using organic fertilisers in buffer strips, questioning how to manage cattle access to those areas, as their excrement, allegedly considered organic fertiliser, might also remain in these areas. A representative of the chamber of agriculture in Hungary noted the additional burden of demonstrating that pesticides and fertilisers are only used in the area outside the buffer strip.

In eight out of 35 interviews, farmers emphasised **context-specific challenges** impacting compliance with GAEC 4. A Dutch farmer with small plots noted that buffer strips take up a significant part of the land, leading to uncertainty on whether specific derogations are in place in the case of small parcels. Furthermore, an organic farmer expressed confusion about the need for buffer strips next to rivers and streams despite not using pesticides in their practice.

In six out of 35 interviews about GAEC 4 compliance, farmers mentioned **administrative and organisational challenges.** An Irish farmer highlighted discrepancies between the maps and tools used to calculate compliance with CAP requirements and OSI maps [15] used at the national level. Another Irish farmer considered the requirements under this GAEC as redundant, as its objective is already ensured through the implementation of good agricultural practices under the EU Nitrates Directive and SMR 2 (as well as Proper and Safe Use of Plant Protection Products under SMR 7).

CSP MAs/PAs and stakeholders in LT, LV and SI flagged that this GAEC is implemented with further national restrictions creating more burden on farmers and administrations, while a German interviewee noted the overlapping of multiple national and regional rules on water protection.

14 BE-WA, BG, IE, ES, FR, IT, LU, MT, SI.
15 OSI – Ordnance Survey Ireland maps.

GAEC 1

Cited by 29 farmers and three CSP MA/PAs and stakeholders (AT, DE, FI).

GAEC 1 focuses on the **preservation of permanent grasslands**, which are vital for storing significant amounts of carbon. Under this standard, Member States are required to maintain the 2018 ratio of permanent grassland relative to agricultural area, with a maximum allowable decrease of 5%. This rule ensures a uniform approach across the EU, though Member States can introduce additional measures to enhance its effectiveness. While 22 Member States monitor this ratio at the national level, five CSPs (BE-FL, BE-WA, DE, ES and FR) do so at the regional level. Each Member State had to report the 2018 ratio at their chosen level. Notably, Malta has no permanent grassland.

Farmers across Europe expressed concerns about the **lack of clarity** regarding this GAEC. In 15 out of 29 interviews, farmers highlighted their struggle to understand specific requirements related to this GAEC. For instance, a Latvian farmer mentions uncertainty from authorities about whether grass between bushes qualifies as permanent grassland. Complexity within GAEC 1 is noted by a Lithuanian farmer who cited uncertainties in grassland restoration methods and the distinctions between grasslands of different ages. Additionally, based on his experience, the farmer notes that permanent grasslands generally yield less in terms of feed production compared to 'renewed' grasslands. This is primarily due to the prevalence of annual grass varieties rather than multi-annual ones. Consequently, he finds it challenging to meet the requirement of maintaining grasslands for five years while also sustaining an adequate feed yield.

Farm management practices (mentioned in 15 out of 29 interviews) are also an important aspect influencing compliance with GAEC 1. A Romanian farmer highlighted the costs and effort required to maintain natural or seeded grasslands, noting that it requires specialised equipment and labour, both of which might be expensive and difficult to source.

Contextual specifications (mentioned in six out of 29 interviews) might further complicate compliance according to farmers. In terms of land planning, farmers have criticised the system of designating permanent grasslands, which relies on historical data about past land use. According to a Dutch farmer, the current regulations classify land as 'permanent grassland' after five to six years, and 'locking it' into that designation indefinitely is problematic. On this topic, a farmer commented that temporary grasslands are often turned over prematurely simply to prevent them from becoming permanent, undermining the ecological goals of the regulation.

A farmer in Germany highlighted land use issues related to the prohibition of ploughing grasslands, which disrupts the balance of feed for grass-fed animals. According to the respondent, this situation forces farmers to buy supplementary feeds such as maize, which also leads to the underutilisation of grasslands. Member States have leeway in the definition of permanent grassland and a German representative of a farmer organisation confirms that the national prohibition on ploughing is a source of burden for farmers.

Finally, a Romanian farmer also highlighted the need for guidance regarding the possible land use of permanent grasslands, specifically concerning whether photovoltaic parks can be installed on them.

With respect to **the economic impact** (mentioned in six out of 29 interviews), respondents indicated that classifying land as permanent grassland without clear guidelines restricts crop rotation and land use flexibility, leading to potential financial losses. Additionally, a Romanian respondent pointed out that maintaining grasslands is costly, requiring specialised equipment and labour, which are expensive and difficult to find. A Lithuanian farmer added that the grassland payments do not cover maintenance expenses.

GAEC 5 - Cited by 30 interviewees

Cited by 30 farmers and five interviewees at Member State level (AT, BE-WA, DE).

GAEC 5 aims to **reduce the risk of soil degradation and erosion through effective tillage management**. Member States are required to establish guidelines for soil tillage, particularly in areas identified as being at risk of erosion. These areas are primarily determined based on slope gradient, though some Member States also use additional criteria, such as soil type and erosion modelling. The management rules set by the Member States include measures like restricting ploughing directions relative to the slope and mandating plant cover or vegetation during specific periods to protect the soil.

The **contextual specifics** (mentioned in 17 out of the 30 interviews) of agricultural landscapes significantly impact farmers' ability to comply with the GAEC 5 standard. Three farmers in Bulgaria, for instance, raised concerns about the feasibility of ploughing perpendicular to the slope in their areas, including safety concerns due to the risk of machinery rolling over. Similarly, farmers in Spain, Hungary and Cyprus cite challenges posed by the percentage of land in sloping areas, highlighting the need for tailored approaches that take into account land profiles. Opinions on the feasibility of this GAEC standard vary depending on farm size. For instance, a farmer in Luxembourg highlighted the difficulty of implementing grass strips to prevent erosion on numerous small plots, some as small as one hectare. Conversely, a Spanish farmer noted the heavy workload required to comply with GAEC 5 when managing more than 100 hectares of land. One German farmer highlighted the need to consider regional soil characteristics when developing erosion control strategies for GAECs. They emphasised that the effectiveness of measures like slurry application can differ significantly depending on the soil type, such as sandy versus clay-based soils.

The need to adapt **farm management operations** (mentioned in 15 out of 30 interviews) is another source of difficulty, particularly regarding equipment and the timing of activities. A farmer in Romania expressed concern about the overuse of equipment due to this GAEC standard, which leads to additional pollution and associated costs. Meanwhile, farmers from Finland and Denmark highlighted challenges related to the timing of ploughing activities prescribed by this GAEC. An Austrian farmer pointed to the challenge of setting dates for ploughing, as weather conditions can hinder the planning.

Furthermore, **the clarity of the legal requirements** of GAEC 5 (mentioned in eight out of 30 interviews) emerges as a concern among respondents, although to a lesser extent. Farmers in Latvia and Slovakia expressed difficulties understanding the requirements of GAEC 5, citing highly complex regulations and confusion about the required erosion control measures. In Germany, inconsistencies in enforcement and practical challenges, such as uncertainty about ploughing practices and soil management, were highlighted.

A Bulgarian farmer also mentioned that the measurement of slope percentages can be rather subjective, thus adding to the lack of clarity concerning this GAEC.

Economic impacts (mentioned in six out of 30 interviews) are also identified, with farmers in Lithuania and Italy highlighting potential income and production losses due to prescriptions on tillage practices. An Italian farmer highlighted the investment costs associated with meeting GAEC 5 e.g. purchasing machinery adapted to the minimum tillage.

Finally, **administrative and organisational** (mentioned in four out of 30 interviews) aspects add another layer of complexity to the implementation of GAEC 5, although those were mentioned less often. Overall, references to administrative challenges for this GAEC are rather generic and largely overlap with what is stated for other requirements. Farmers in Spain and Bulgaria complained about a lack of clarity on compliance requirements, requiring considerable efforts to look for information to comply with the GAEC.

A specifically national issue was mentioned by three stakeholders from Belgium Wallonia. After a new land classification, many plots were defined at risk of erosion. This caused unexpected issues for farmers, who had to adapt to new techniques (e.g. no tillage or minimum tillage), recording obligations and more restrictive regimes.

GAEC 9 – Cited by 17 interviewees

The GAEC 9 requirement **prohibits the conversion or ploughing of environmentally sensitive permanent grasslands located within Natura 2000 sites**. As part of the CSPs, Member States have provided estimates of the number of hectares that will be protected under GAEC 9 [16]. A recent study [17] reported that the largest areas of designated environmentally sensitive permanent grasslands are found in DE, EL, ES, FR, IT and RO, which generally correspond to the countries with the largest overall surface areas of Natura 2000 sites (with Greece being an exception). In contrast, BE-FL, CY, FI and LU have designated areas of less than 10 000 hectares.

The most frequently raised concern in the context of GAEC 9 is the lack of clarity **regarding the legal requirements** (mentioned in 12 out of 17 interviews). A number of farmers from different regions expressed their confusion over the complexity of the rules. Moreover, farmers stated that this GAEC might partially overlap with other requirements already applying to Natura 2000 areas. Farmers in Latvia, Wallonia in Belgium, Ireland and Slovenia highlighted difficulties in understanding the rationale behind the requirements, with some noting discrepancies in enforcement based on farm registration status.

Farm management operations (mentioned in five out of 17 interviews) present another set of challenges in complying with GAEC 9. Specifically, farmers pointed out issues with the timing of operations, echoing remarks on the rigidity of the operations prescribed in other GAECs (e.g. see GAEC 6 and 1). Respondents from Finland, France, and Wallonia in Belgium noted difficulties in adhering to prescribed dates for field work due to variable weather patterns, requesting more flexibility in implementation. **Administrative and organisational aspects** (mentioned in two out of 17 interviews) also come into play, although they are perceived as somehow less important when it comes to this GAEC.

Box 1. Rules on other requirements related to Natura 2000 areas

Cited in seven interviews with farmers and five interviews with CSP MAs/PAs and stakeholders.

Alongside GAEC 9, seven respondents from Slovenia, Hungary, Spain and Estonia indicated issues related to compliance with additional rules related to Natura 2000 regulations. A farmer cannot apply for animal welfare support in Slovenia due to a pasture ban in sensitive grassland areas. A Hungarian farmer struggles with costly, specific equipment like reciprocating mowers, while another finds it nearly impossible to conduct farming activities due to strict limitations. An Estonian farmer must remove hay from meadows regardless of its condition, posing issues when weather or equipment problems cause delays.

Some CSP MAs/PAs and stakeholders identified areas of burden in Natura 2000 related rules or aid schemes. Two respondents, in Bulgaria and Slovenia, complained about rigid mowing deadlines that do not consider weather and field conditions and might prove impossible to fulfil or result in low-quality feed. A German interviewee claimed they are not sufficiently compensated for the requirements to reduce their burden in sensitive areas, such as Natura 2000. A Hungarian farmer organisation representative, arguing that the nutrient stock of grasslands is declining (as a consequence of fewer animals grazing due to weather conditions), proposed to allow the spreading of livestock manure in Natura 2000 areas.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

GAECs 2 and 3

GAEC 2: cited by 15 farmers and five interviewees at Member State level (AT, BG, DE, SI).

GAEC 3: cited by seven farmers.

Respondents reported the fewest issues with complying with GAEC 2, which was mentioned in 15 interviews, and GAEC 3, which was mentioned in seven interviews.

GAEC 2 aims to **protect carbon-rich soils, particularly wetlands and peatlands**. These ecosystems vary significantly across Member States due to differing climatic conditions, with peatlands more common in northern Europe. Implementing this GAEC requires comprehensive mapping of agricultural areas that qualify as wetlands and peatlands. As peatlands and wetlands are specific to certain territories, e.g. cold climate in northern Europe, it can be assumed that only respondents from countries where this type of soil is present have commented on this standard.

16 European Commission. (2023). Approved 28 CAP strategic plans 2023-27. https://agriculture.ec.europa.eu/cap-my-country/cap-my-country/cap-my-country/cap-strategic-plans_en.
17 European Commission, Directorate-General for Agriculture and Rural Development, Chartier, O., Krüger, T., Folkeson Lillo, C. et al., Mapping and analysis of CAP strategic plans – Assessment of joint efforts for 2023-2027, Chartier, O.(editor), Folkeson Lillo, C.(editor), Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2762/71556.

Moreover, due to incomplete mapping, some Member States postponed the implementation of GAEC 2 until 2024 or 2025. Sixteen Member States have justified delays, which could also partly explain why issues complying with GAEC 2 were not mentioned as often as other GAECs. As argued by an Austrian MA representative, this country has ambitiously applied GAEC 2 as of 2023, but the lack of an updated area database made implementation problematic.

With respect to GAEC 2, respondents find the requirement complex due to the long-term nature of the commitments and the associated land use constraints. Challenges arise from managing peatlands within arable fields, especially on small farms with limited space for alternative management practices. A Latvian farmer reported that peatlands in the middle of his arable fields make it difficult to follow this GAEC and manage them differently, as his fields are relatively small (between 1-10 hectares). Similarly, a German advisory service representative pointed out the high economic cost of managing these areas and the time-consuming parcel identification in the CAP application, particularly for potato growers whose cultivated fields change on a yearly basis.

GAEC 3 **puts a ban on burning arable stubble**. Seven respondents mentioned that this standard creates challenges for phytosanitary reasons, specifically for weed control. As such, they expressed concerns about the ban, as it eliminates a traditional and effective method to fight resistant weeds.

Targeted burning in specific problem areas could offer a solution. They also stated that compliance with this GAEC entails additional costs and logistical difficulties, such as transporting stubble to collection points or investing in specialised machinery without providing direct economic benefits.

The sections below detail the challenges farmers face in complying with SMRs and other legal requirements, in order of frequency of mention.

SMR 2 and rules on nitrates

Cited by 11 farmers and 10 CSP MAs/PAs and stakeholders.

Compliance with SMR 2 involves implementing practices that prevent the **contamination of groundwater from agricultural activities**, as prescribed by Articles 4 and 5 of the EU Nitrates Directive [18].

Irish farmers provided an extensive explanation of the challenges faced when complying with this requirement, which is particularly relevant to them due to the extensive dairy sector value chain in Ireland. First, they are concerned over the reduction in the allowable limit of slurry spreading, from 250 kg N/ha to a projected 170 kg N/ha. This reduction is perceived as particularly damaging to the dairy industry as it de facto forces farmers to limit livestock numbers. Second, they stated that restrictions on when they can spread slurry conflict with the practical needs dictated by Ireland's climate, which is characterised by heavy rainfalls. As such, the narrow window for spreading forces rapid spreading once the ban is lifted, leading to environmental risks like slurry runoff into rivers during rainy periods. Lastly, managing rainwater influx into slurry tanks is considered a highly impractical issue. Ireland's heavy rainfall complicates manure storage capacity, risking overflow and contamination. Despite government recommendations to invest in rainwater tanks, the high costs and bureaucratic hurdles deter many farmers from implementing these solutions effectively. Moreover, the recent update of the GEAC, which also stopped farmers from spreading soiled water (alongside manure itself), further increased the need for storage capacity.

Respondents from other Member States reported similar challenges: a Polish farmer finds the fixed periods to spread manure not adequate to local conditions, whereas a Portuguese farmer views the rules as tight and bureaucratic; finally, an Italian farmer highlighted the need for more information and training in this regard.

Interviews with CSP MAs/PAs and stakeholders in AT, BE-WA, IE, HU, LV, MT and RO referred to SMR 2 or to the EU Nitrate Directive in general. Several of them recognised the importance of controlling water pollution but pointed out the number of rules that make compliance a difficult task. A Maltese advisor noted that the entire country is classified as a nitrate vulnerable zone (NVZ), which entails more restrictions and obligations. A PA representative in Wallonia explained that farms with excessive animal/land ratio must carry out additional administrative tasks related to manure spreading and storage and farming operations (cover crops). Furthermore, farmers frequently change their planning due to weather, which multiplies recording activities and declarations to authorities.

In Ireland, three interviewees agreed that compliance with SMR 2 and other nitrate-related requirements is difficult. One of them mentioned administrative tasks (nitrate monitoring, fertilisers recording), obligatory farming practices (buffer zones) and high costs (storage systems), particularly affecting small and fragmented farms. For an advisory service representative, communicating with farmers on this highly complex issue is also a challenge. All Irish respondents claimed for more support from the authorities, in terms of additional funds or training.

Box 2. Rules on other requirements related to nitrates

Cited in seven interviews.

Apart from SMR 2, farmers reported challenges in compliance with additional nitrate rules, i.e. those included in Annex XIII of Regulation (EU) 2021/2115. Respondents from Sweden, Poland and Italy expressed worries about the burdensome and overwhelming quantity of legal requirements, stating that they find it challenging to comply with them. An Austrian respondent requested more lenient deadlines for farm management tasks in keeping with his request for flexibility in manure spreading deadlines. Similarly to what was stated for SMR 2, there are concerns about not considering local weather patterns, with a Bulgarian respondent believing that the regulations do not account for climate changes, such as an earlier growing season. Another further recurring topic among responses from Estonia, Hungary and Austria is the economic consequences; they are concerned that low nitrogen fertiliser restrictions could impact their yield. Austrian respondents' perception of the lack of compensation for restrictions is consistent with other respondents' broader concerns about the state of the economy.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

18 Council Directive 91/676/EEC of 12 December 1991 concerning the protection of waters against pollution caused by nitrates from agricultural sources. Articles 4 and 5.

SMR 8 (use of pesticides)

SMR 7 (plant protection products)

Other rules on pesticides

SMR 8: cited by eight farmers and one CSP MAs/PAs and stakeholders.

SMR 7: cited by seven farmers and four CSP MAs/PAs and stakeholders.

Other rules on pesticides: cited by three CSP MAs/PAs and stakeholders.

SMRs 7 and 8 both refer to regulations on **plant protection products**. In addition, farmers also provided information on compliance difficulties with other regulations related to the use of pesticides and plant protection listed in Annex XIII of Regulation (EU) 2021/2115.

SMR 8 relates to the 'Sustainable use of pesticides' directive [19]. With respect to this SMR, most of the respondents reported issues concerning the requirements for handling and storage of pesticides and disposal of remnants. Three Bulgarian farmers pointed out that the requirement to contract specialised companies to dispose of empty packaging is costly and unjustified. They argue that the few companies operating in this sector in Bulgaria charge high fees, imposing a significant financial burden on farmers who would prefer to dispose of the packaging themselves, provided that this is done correctly. Another Bulgarian farmer further mentioned that pesticides must be registered in the national waste information system, whether used or not. This requirement is perceived as an administrative burden, contributing to the challenges farmers face in managing pesticide use and disposal effectively. Additionally, a Polish farmer questioned the need to undergo training in order to be eligible for CAP payments even if he is under an organic regime and does not use antibiotics or pesticides in his farming practice.

SMR 7 [20] refers to regulation concerning the placing of plant protection products on the market and sets out provisions for their proper use. Only seven farmers reported challenges in complying with this specific SMR. One Finnish farmer found the required schedule for checks on sprayers too frequent, whilst two Bulgarian farmers commented on a specific communication issue with beekeepers, which shall be protected from pesticide exposure. In fact, farmers shall insert their planning for the application of pesticides into an electronic platform for the disclosure of plant protection activities. This system, however, does not allow access to information about the location of beehives, thus hampering the possibility of directly communicating with beekeepers on their intentions to use pest protection products. This limitation prevents crop farmers from effectively coordinating with beekeepers to minimise potential risks or conflicts related to the use of plant protection products.

Difficulties in complying with other regulations on plant protection, pesticide use and plant health are also reported. In Greece, a respondent mentioned difficulties due to the phasing out of essential products, which are replaced by more expensive alternatives. Cypriot respondents are concerned about the sustainability challenges of switching to more expensive pesticides in water-stressed agriculture. In addition, Hungarian vineyard owners fear increased costs and potential yield losses due to new pesticide regulations. A Greek grapes grower also reported a decline in quality and increased costs due to the discontinuation of products. In addition, other Hungarian respondents reported frustration with frequent changes in legislation, which they describe as impractical. A Lithuanian and a Polish farmer echoed these sentiments and questioned the rationale behind the perceived stringency of the regulations.

A Portuguese farmer expressed concern about the decreasing number of authorised pesticides compared to other countries (especially non-EU Member States). Interviews with CSP MAs/PAs and stakeholders (BE-WA, CZ) confirmed the concern about pesticides being banned without viable alternatives, while a Hungarian representative of a farmer organisation argued that reducing the active substance of certain products leads to more spraying (i.e. 5-8 times compared to three times in the past). In Slovenia, a farmer noted that only half of the active substances registered in the EU are actually available in the country and that national rules are stricter (e.g. not possible to repeat spraying when necessary due to rainy weather).

Another frequent complain among interviewees at Member State level is related to recording and reporting obligations, that were considered burdensome in BE-WA, CZ, HU, LT and SI. Interviewees mentioned too frequent reporting or strict recording deadlines (e.g. CZ; in HU some spraying operations need to be recorded within 24 hours).

Finally, an evaluator interviewed in Bulgaria provided an example of repeated reporting. The supporting documents proving compliance with SMR 8.3 and required in the context of an eco-scheme correspond to the documents needed for the issuing of the sprayer certificate. In order to reduce administrative burden related to the eco-scheme, submitting the sprayer certificate should be enough.

19 Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides. Article 5(2) and Article 8(1) to (5).
Article 12 with regard to restrictions on the use of pesticides in protected areas defined on the basis of Directive 2000/60/EC and Natura 2000 legislation.
Article 13(1) and (3) on handling and storage of pesticides and disposal of remnants.

20 Regulation (EC) N° 1107/2009 of the European Parliament and of the Council of 21 October 2009concerning the placing of plant protection products on the market and repealing Council Directives 79/117/EEC and 91/414/EEC. Article 55, first and second sentence.

SMR 9, SMR 11 (animal welfare)

SMR 9: cited by six farmers

SMR11: cited by two farmers

Rules on animal welfare: cited by seven CSP MAs/PAs and stakeholders

SMR 9 establishes **minimum standards for the protection of calves confined for rearing and fattening**, particularly focusing on the provisions outlined in Articles 3 and 4 [21]. Interview findings indicate that six farmers report issues complying with this SMR. Two Portuguese farmers reported difficulties complying with the dehorning regulation, mentioning lack of qualified personnel and the additional costs involved. A respondent from Bulgaria expressed difficulties in compliance due to the mountainous terrain and inadequate infrastructure, such as poor road conditions and insufficient energy supply.

Only two respondents mentioned problems of compliance with SMR 11, which refers to the Council directive on the protection of animals kept for farming purposes [22]. One farmer gave the example of tail docking of ewes, which must be carried out by a veterinarian and is seen as costly and hardly profitable for the farmer. In addition, sending in the required documentation is also seen as a burdensome process. Notably, none of the respondents pointed out specific compliance issues related to SMR 10 [23] which lays down minimum standards for the protection of pigs.

Box 3. Rules on other requirements related to animal health and welfare

Cited by 23 farmers and 13 CSP MAs/PAs and other national stakeholders

In addition to compliance with SMR 9 and 11, the interviews provided insight into compliance issues with other requirements related to animal welfare. For example, Slovakian respondents expressed concerns about overly complicated rules and strict transport rules, which they find burdensome and unclear. Similarly, a Greek farmer pointed to the complexity of the institutional framework, while another Greek respondent reported a lack of adequate advisory support and training for livestock farmers. In addition, Italian and French respondents pointed out that the rules on beak trimming and the compulsory ear-tipping of goats are considered impractical and counterproductive for animal welfare.

Moreover, the interviews provided farmers' perspectives on compliance with requirements pertaining to animal health. For example, a farmer from Sweden complained about the strict controls and the poor quality of ear tags, which often go missing and must be replaced immediately during inspections, causing complications in operations. Another issue highlighted by respondents from Spain, Portugal and France is the use and cost of medication.

CSP MAs/PAs and other stakeholders from AT, BE-WA, FI, HU and SK mentioned issues related to animal welfare and animal health. Recording and reporting obligations represent a common cause of burden. Farmers record, for each animal, ear tags, birth, weaning, movement, health-related information, etc. Repeated reporting, tight deadlines, unclear regulatory frameworks, further administrative tasks associated with CAP funding applications, additional costs and fear of sanctions add even more burden to them.

In Slovakia, the representative of a pig breeder association summarised that farmers must report animals in the national register and record any change (e.g. sale, death, purchase, movement) within seven days. In addition, when participating in an animal welfare aid scheme, they report to the PA the weaning of piglets, the number of sows, and any change in LU within seven days. The respondent specified that these recording and reporting obligations create a significant burden, particularly for large farms.

In Austria, an interviewee explained that different reporting systems apply to different animals under different national legislations (i.e. CAP legislation and sectoral legislation). In addition, farmers must fulfil burdensome recording rules when moving the animals to the alpine pastures and back to the valley. Conflicting legislation and changes in the sectoral law have brought even more complexity in the 2023-2027 programming period.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

21 Council Directive 2008/119/EC of 18 December 2008 laying down minimum standards for the protection of calves. Articles 3 and 4.
22 Council Directive 98/58/EC of 20 July 1998 concerning the protection of animals kept for farming purposes. Article 4.
23 Council Directive 2008/120/EC of 18 December 2008 laying down minimum standards for the protection of pigs. Articles 3 and 4.

SMR 1 (water)

Cited by five farmers and 1 CSP stakeholder (RO).

SMR 1 [24], laying down the requirements to **control diffuse sources of pollution by phosphates** was mentioned by five farmers, providing insights into the compliance issues. An Italian interviewee emphasised the need for better access to information and training to comply with water management regulations effectively. Respondents from Portugal and Latvia also indicated that lack of understanding and knowledge is the main perceived compliance problem. Two Estonian farmers pointed to the administrative burden of these regulations.

An Estonian farmer expressed frustration with the requirement to obtain permits from the environment agency before grazing in fields previously spread with manure, despite certain areas supposedly posing no risk to water protection. Another Estonian farmer expressed uncertainty about specific regulations, such as the leakproof requirement for manure and urine storage, which necessitated costly upgrades to older clay floors with new concrete. The burden of maintaining field record books was highlighted as onerous, requiring more information and training.

In addition to the SMRs, respondents provided insights on compliance issues related to other rules on water. Issues of regulatory clarity are evident for French and Spanish respondents, as they struggle with unclear guidelines and restrictions on water use for livestock (also mentioned by one Croatian representative of advisory services). Economic impacts are also reported, with high costs and water scarcity affecting farming practices and sustainability. As highlighted by respondents from Bulgaria and Germany, there are also environmental considerations for which farmers question the necessity and practicality of certain legal requirements related to irrigation and environmental impact.

Interviews with CSP MAs/PAs and other stakeholders shed light on specific water-related issues in Cyprus (three interviewees) and Malta (two respondents). Respondents are particularly concerned with the restriction to irrigation contained in Article 74 of Regulation (EU) 2021/2115, which they see as a source of burden for farmers and a hindering factor for the development of agriculture. Several aspects are highlighted, including the excessive restrictions on investments (e.g. related to the use of groundwater, the expansion of irrigated areas, the creation of new irrigation systems in farms) and the challenging compliance with numerous and complex rules.

In Cyprus, these issues are exacerbated by structural water shortage and conflicting national legislation on forestry and urban planning. According to the MA, Article 74's rule affecting the eligibility of new irrigation systems to the achievement of 15% water saving is unsuitable in a country where modern irrigation techniques are already widely applied [25].

24 Directive 2000/60/EC of 23 October 2000 of the European Parliament and of the Council establishing a framework for Community action in the field of water policy: Article 11(3), point (e), and point (h), as regards mandatory requirements to control diffuse sources of pollution by phosphates.

25 Article 74 foresees that a certain degree of potential and actual reduction of water consumption must be established in CSPs as an eligibility conditions for investments in irrigation systems. However, this percentage is to be fixed by Member States.

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