



# Assessing simplification of the CAP for beneficiaries and administrations

**Good Practice Workshop**  
Budapest (Hungary), 7-8 November 2024



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Additional information about the activities of the European Evaluation Helpdesk for the CAP is available on the Internet through the Europa server [<https://eu-cap-network.ec.europa.eu/support/evaluation>].



# Table of Contents

<b>List of figures</b>	iv
<b>List of tables</b>	iv
<b>List of acronyms</b>	iv
<b>Executive summary</b>	1
<b>1. Introduction</b>	2
<b>2. Day 1 - Understanding simplification and how Member States have assessed it so far</b>	4
2.1. Setting the scene	4
2.1.1. Background on simplification	4
2.1.2. Taking stock and assessing impact of simplification measures	4
2.2. Sharing experiences	5
2.2.1. Implementation costs of RDPs - Insights from several evaluation studies	5
2.2.2. Evaluation of the impact of overregulation on the implementation of the national RDP 2014-2020	7
2.2.3. An approach to evaluate administrative burden	7
<b>3. Day 2 - Increasing knowledge on how to assess simplification in the future</b>	9
3.1. Sharing experiences	9
3.1.1. Cases and experiences from Spain	9
3.1.2. Administrative burden for farmers - Insights from EU level studies	11
<b>4. Concluding remarks</b>	13
<b>Annex 1 - Results from group discussions day 1</b>	14
<b>Annex 2 - Results from group discussions day 2</b>	22
<b>Annex 3 - Results of the feedback poll</b>	28



## List of figures

<b>Figure 1.</b> Participants of the Good Practice Workshop per role and Member State .....	<b>2</b>
<b>Figure 2.</b> Simplification category 'adoption of simplification measures' .....	<b>14</b>
<b>Figure 3.</b> Simplification category 'costs and cost structure' .....	<b>17</b>
<b>Figure 4.</b> Simplification category 'design of interventions' .....	<b>20</b>
<b>Figure 5.</b> Overview of received feedback on the Good Practice Workshop from 50 participants .....	<b>28</b>

## List of tables

<b>Table 1.</b> Comments and challenges in relation to the simplification category 'level of adoption of simplification measures' .....	<b>15</b>
<b>Table 2.</b> Comments and challenges in relation to the simplification category 'costs and cost structure' .....	<b>17</b>
<b>Table 3.</b> Comments and challenges in relation to the simplification category 'design of interventions' .....	<b>20</b>
<b>Table 4.</b> Feedback in relation to the preliminary findings (i.e. identified burdens) of the 2024 study on simplification and administrative burden for farmers and other beneficiaries .....	<b>22</b>

## List of acronyms

APR	Annual Performance Report
AKIS	Agricultural Knowledge and Innovation System
CSP	CAP Strategic Plan(s)
DG	Directorate-Generale
DG AGRI	Directorate-General Agriculture and Rural Development
EIP OG	European Innovation Partnership Operational Group
FAMENET	Fisheries and Aquaculture Monitoring, Evaluation and Local Support
GDPR	General Data Protection Regulation
GPW	Good Practice Workshop
KPI	Key Performance Indicator
MA	Managing Authority
RDP	Rural Development Programme
PA	Paying Agency



# Executive summary

The eighth Good Practice Workshop of the European Evaluation Helpdesk for the CAP addressed the topic of assessing the simplification of the CAP for beneficiaries and administrations. It took place in Budapest (HU) on 7 and 8 November 2024 and was attended by 91 participants from 26 different EU Member States, including representatives of Managing Authorities, Paying Agencies, evaluators, Directorate-Generale for Agriculture and Rural Development, researchers, national CAP networks, and other relevant stakeholders.

The workshop aimed to increase the evaluation knowledge of participants and provide an opportunity for networking and exchange of practical experiences and ideas to assess simplification in the context of CAP Strategic Plans, covering the perspectives of both beneficiaries and administrations.

Both days of the workshop focused on sharing Member States' experiences from existing assessments and studies of various aspects of simplification carried out at both the Member State and EU level. The first day introduced the concept of simplification and its key components and offered insights from assessing the impact of measures taken at EU level. The second day presented the preliminary findings from the EU level study on simplification and administrative burden for farmers under the CAP (to be published in early 2025).

Simplification was analysed from the perspective of its different aspects (i.e. the costs and cost structure, the level of adoption of simplification measures, and the design of interventions) as well as from the perspective of the different phases of programme design and implementation (i.e. preparation, application, implementation/reporting, and monitoring/control) and its different target groups (i.e. administrations and beneficiaries).

Key messages from the Good Practice Workshop are:

- › **Simplification of the CAP, including reduction of administrative burden, is an ongoing process that needs to be assessed to improve policy design and implementation.** Assessing how simplification has affected beneficiaries and administrations provides useful information on the design and cost of interventions as well as on the success of simplification measures. This information can feed back into the simplification efforts and processes to identify further actions to simplify policy and make the administration more efficient and the policy more attractive for beneficiaries to apply for and implement projects.
- › **Understanding the key aspects of simplification and areas of burden is an important first step in the assessment.** This may include the cost structure of the delivery of CAP Strategic Plans, including costs incurred by administrations, such as adjustment costs for complying with legal requirements, administrative costs for management, audits and controls, and costs incurred by beneficiaries, such as administrative costs of applications and compliance. Further aspects relate to the level of adoption of simplification measures such as digitalisation, the use of an area-based monitoring system, simplified cost options or the role of governance in simplification processes. Another important aspect of simplification, particularly relevant for beneficiaries, is the design of interventions, such as the rules and requirements for applying for support.

- › **The assessment of simplification entails various methodological and governance-related challenges, which need to be addressed.** Methodological challenges, such as the definition of costs, their quantification and disentangling determinants or challenges related to data availability and collection, can be overcome with clearly defined evaluation questions and selecting relevant evaluation methods. The involvement of various actors with multiple functions and different evaluation cultures, particularly in regionalised Member States, or building trust between Managing Authorities, evaluators and beneficiaries can be addressed through coordination and communication activities.
- › **The application of quantitative methods, where possible, combined with obtaining the views of key stakeholders, seems to be the best way forward, given existing challenges.** Evaluators can consult methods that have worked, such as using the standard cost model to quantify administrative burden or cost-impact analysis and combine them with structured qualitative methods to collect data from stakeholders (e.g. interviews and surveys). In addition, using outcomes from previous studies on simplification can help identify further actions to simplify policies for both farmers and administrations.
- › **The last step in an assessment is following up on recommendations.** Establishing a communication and dissemination strategy, having an owner of each recommendation and following up on whether proposed improvements to simplification have been adopted/implemented can lead to longer-term policy improvements, notably before 2028.
- › **Do not forget overregulation.** The distinction between mandatory requirements of CAP legislation and additional ones not derived from the CAP legislation enables the assessment of potential gold plating in order to undertake corrective measures and reduce unnecessary burdens on administrations and beneficiaries.



# 1. Introduction

The eighth Good Practice Workshop (GPW) of the European Evaluation Helpdesk for the CAP (Evaluation Helpdesk) took place in Budapest (HU) on 7 and 8 November 2024. The workshop focused on the assessment of simplification of the CAP for both beneficiaries and administrations and provided an opportunity for participants to gather and share experiences, insights and ideas about this topic. The ultimate goal was to help Member States prepare for future evaluations of simplification.

Simplification is subject to specific attention in CAP Strategic Plans (CSPs). According to Regulation (EU) 2021/2115 of the European Parliament and the Council<sup>1</sup>, when designing CSPs, Member States were expected to explain how their interventions and elements common to several interventions contribute to simplification and reducing administrative burden for final beneficiaries.

In this context, the assessment of simplification is an important issue from an evaluation perspective. The synthesis of ex ante evaluations of the CAP post-2020<sup>2</sup> confirmed that all 28 CSPs support simplification and the majority have targeted the reduction of administrative burden. In addition, simplification is enshrined in the Commission Implementing Regulation (EU) 2022/1475<sup>3</sup> as a component of efficiency and Member States are expected to assess it both for beneficiaries and administrations, with a special focus on administrative costs and the use of digital tools and satellites.

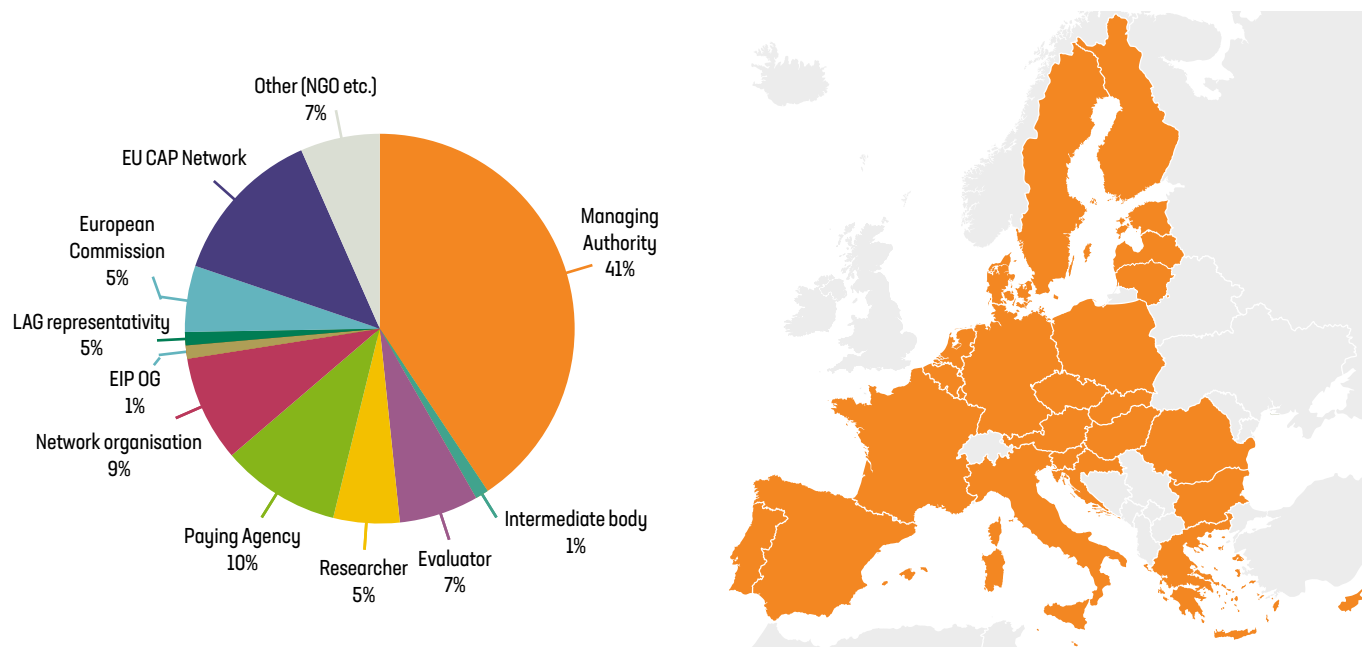
Furthermore, an EU level study on simplification and administrative burden for farmers under the CAP is expected to be published in early 2025. It has aims to support the European Commission's Directorate-General for Agriculture and Rural Development (DG AGRI) in understanding and assessing the burden on EU farmers arising from the 2023-2027 CAP programming period and identifying concrete suggestions for further simplification.

The workshops' specific objectives were to:

- > Increase the evaluation knowledge of stakeholders involved in the assessment of simplification in the context of CSPs, covering perspectives from beneficiaries and administrations.
- > Exchange practical experiences and triangulate knowledge from existing assessments and studies of simplification, including both Member State and EU level evaluations and studies.
- > Provide an opportunity for networking and identification of needs for further support for Managing Authorities (MA), CAP networks and evaluators about the evaluation framework for assessing simplification both for beneficiaries and administrations.

Ninety-one participants from 26 different Member States attended the event over two days, including MAs, evaluators, Commission representatives, Paying Agencies, Local Action Group representatives, researchers, representatives of National CAP Networks and other relevant stakeholders.

**Figure 1. Participants of the Good Practice Workshop per role and Member State**



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).

<sup>1</sup> Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) 1305/2013 and (EU) 1307/2013, OJ L 435, p. 1-186, ELI: <http://data.europa.eu/eli/reg/2021/2115/oj>.

<sup>2</sup> European Commission, DG AGRI, Unit A.3 (2023): Synthesis of ex ante evaluations of CAP post 2020. [https://eu-cap-network.ec.europa.eu/publications/synthesis-ex-ante-evaluations-cap-post-2020\\_en#section-resources](https://eu-cap-network.ec.europa.eu/publications/synthesis-ex-ante-evaluations-cap-post-2020_en#section-resources).

<sup>3</sup> Commission Implementing Regulation (EU) 2022/1475 of 6 September 2022 laying down detailed rules for implementation of Regulation (EU) 2021/2115 of the European Parliament and of the Council as regards the evaluation of the CAP Strategic Plans and the provision of information for monitoring and evaluation, OJ L 232, 7.9.2022, p. 8-36, ELI: [http://data.europa.eu/eli/reg\\_impl/2022/1475/oj](http://data.europa.eu/eli/reg_impl/2022/1475/oj).





*Participants at the Good Practice Workshop 'Assessing simplification of the CAP for beneficiaries and administrations', 7-8 November, Budapest, Hungary.*



## 2. Day 1 - Understanding simplification and how Member States have assessed it so far

### 2.1. Setting the scene

#### 2.1.1. Background on simplification



*Ms Marili Parissaki, Good Practice Manager at the European Evaluation Helpdesk for the CAP.*

Ms Marili Parissaki from the Evaluation Helpdesk gave an introduction to the concept of simplification, which is a component of efficiency and defined as the minimisation of costs that are not strictly necessary for the achievement of the objectives of the CAP and the adoption of measures that reduce administrative burden for the administration and beneficiaries. She also described the path to simplification since the CAP reform and subsequent efforts to identify and understand simplification aspects and how to structure them. In order to support evaluations of simplification, the factors to be considered include the cost structure, the level of adoption of simplification measures and the design of interventions.

**Link to Ms Parissaki's presentation:** [Background on simplification](#)

#### 2.1.2. Taking stock and assessing impact of simplification measures



*Mr Petros Angelopoulos, Policy Analyst at DG AGRI.*

Mr Petros Angelopoulos from DG AGRI offered insights from the Commission's Simplification Package following a consultation strategy that provided suggestions for the package of measures. A first assessment of the impact of simplification measures suggests that they should help EU farmers reduce paperwork, gain time and legal certainty, and increase flexibility in how their farms are managed. The work on implementing the measures set in the package is ongoing and further adjustments may be needed following the results of studies on the administrative burden for farmers and the new delivery model.

**Link to Mr Angelopoulos's presentation:** [Taking stock and assessing impact of simplification measures](#)





## After the presentation, participants posed the following questions and/or comments

The **Fisheries and Aquaculture Monitoring, Evaluation, and Local Support Network (FAMENET)** asked how the Commission aims to appraise elements that are not directly related to the CAP but do influence them, as different regulations exist on top of the CAP and/or overlap or contradict the CAP.

**Mr Angelopoulos** clarified that one of the first actions to take would be to analyse the consistency of the CAP with other laws outside of it. The new EU Agriculture Commissioner and president of the Commission stated that simplification is a horizontal task, and thus, this work will not be restricted to only the CAP but also other legislation affecting farmers. The goal is to solve legislation overlaps that would complicate the lives of farmers and national MAs.

**Ms Katarzyna Dyja (DG AGRI)** added that simplification is a common task among all Directorate-Generals (DGs) at the European level, but also regarding legislation implemented at the national level. Therefore, simplification is a task for both the EU and Member States.

**An evaluator (IT)** reflected that this is an important stage for the Commission to assess the implementation of the CAP measures at the national level as it is currently designing the post-2027 CAP. Therefore, evaluating simplification is in the hands of the Commission to remove the constraints in the current CAP programming period.

**Mr Angelopoulos** underlined that simplification is discussed in various meetings, forums, etc., among different DGs. The feedback from these meetings will feed future evaluations and Commission reports on simplification.

The **Hungarian MA** commented that the European Council's conclusion during the Hungarian presidency sent a message for the future, including elements which hopefully will lead to simplification.

## 2.2. Sharing experiences

### 2.2.1. Implementation costs of RDPs - Insights from several evaluation studies



Mr Stefan Becker, scientist at the Thünen Institute of Rural Studies.

Administering funding programmes can be a complex matter. Against this background, Mr Stefan Becker and Ms Regina Grajewski from the Thünen Institute of Rural Studies (DE) provided an overview of the implementation of cost analyses of Rural Development Programmes (RDPs) in Germany that have been conducted at the Thünen Institute for the last three funding periods. They discussed research designs, findings and challenges. They argued that such analyses are time-consuming and costly but provide important findings for cost-effectiveness assessments, programme development and more general discussions on administrative simplification.

**Link to Mr Becker and Ms Grajewski's presentation:** [Implementation costs of RDPs - Insights from several evaluation studies](#)



## After the presentation, participants posed the following questions and/or comments

<p>The <b>Hungarian MA</b> asked if there was an evaluation of the difference between measures that are purely compliance-based and those measures that are also result-based.</p>	<p><b>Ms Grajewski</b> explained that there was only one result-based measure (i.e. biodiversity in the agri-environmental scheme) and the costs do not differ from compliance-based measures with similar objectives.</p> <p>She mentioned a new result-based animal welfare measure in Lower Saxony that had been changed to compliance-based in the German CAP Strategic Plan as it was too cost-extensive to have it as result-based.</p>
<p>As one determinant was identified to be impact orientation, <b>an evaluator (IT)</b> asked how the link between impact orientation and administrative cost was managed.</p>	<p><b>Mr Becker</b> explained that what was presented was an estimation, but that the ex post is being prepared in which the impact of the measures will be brought into the equation for the costs.</p>
<p>The <b>Hungarian MA</b> asked what the lessons learnt are on trust building between the evaluator and the MA, as well as the means used to build the trust.</p>	<p><b>Ms Grajewski</b> explained that trust building is strongly linked to administrative procedures. An evaluator must dive deep into the processes and have very intense and in-depth discussions with the MA. It is not always easy to discuss results due to different meanings and interpretations. The view of the MA and other (programme supervisory) institutions does not always coincide with the interests of those responsible for implementing the measures in government ministries (who primarily pursue their specific objectives) nor with the political level, which often ignores administrative aspects.</p> <p><b>Mr Becker</b> added that internal reports were shared with the MA, which were able to provide feedback and use the results in a timely manner for programme management and the preparation of the CSP. This process was seen as important for the building of trust as well.</p>
<p><b>The Italian National Network</b> asked if a recommendation could be to not implement a measure in the future following the evaluation.</p>	<p><b>Mr Becker</b> found that if results showed that a measure does not fit well with the EU framework, such a recommendation could be given. He also stated that it could be recommended to only implement the measure with national funds, which they often recommend for new or more experimental measures.</p>



## 2.2.2. Evaluation of the impact of overregulation on the implementation of the national RDP 2014-2020



Ms Ioanna Dediu from the Romanian MA.

Ms Ioanna Dediu from the Romanian MA presented the evaluation of the impact of overregulation on the implementation of national 2014-2020 RDP. It was an ad-hoc evaluation study based on the Romanian experience from the previous CAP programming period (2014-2022) to identify legal requirements/provisions that represent overregulation in the implementation of the national RDP. The study was implemented between August 2018 and January 2019. The proposed methodology by the evaluator to assess gold plating was a comparative analysis with four reference case studies (Ireland, Aragon (ES), Veneto (IT) and Tuscany (IT)) and identification of additional requirements not derived from European and national legislation.

**Link to Ms Dediu 's presentation:** [Evaluation of the impact of overregulation on the implementation of the national RDP 2014-2020](#)

### After the presentation, participants posed the following questions and/or comments

<p><b>A researcher (FR)</b> asked what was meant with the standard cost unit that was used in the study.</p>	<p><b>Ms Dediu</b> clarified that for the previous CAP programming period, there was a sub-programme for orchards for which standard costs were used. Various institutions searched costs for irrigating orchards, for example how much water was needed per hectare. By doing this, the institutes defined standard costs. Standards costs were also used for wineries and are being used in the CSP for different interventions.</p>
<p>The <b>Austrian MA</b> asked why the four reference case studies were chosen.</p>	<p><b>Ms Dediu</b> clarified that Ireland was chosen as they had the highest rate of access to EU funds. The Veneto region was chosen due to them taking into account expenditure absorption rate of funds and relevance given to viability and competitiveness expenditure. Aragon was chosen as they had the highest spending rates in Spain and significant rate of access to EU funds. Tuscany has extensive experience in rural tourism and introduced standard costs in 2018.</p>
<p>The <b>Italian Paying Agency</b> asked what the highest access to EU funds referred regarding the Irish case study.</p>	<p><b>Ms Dediu</b> indicated that the selection justification for performing the benchmarking analysis of the Irish national RDP was the highest absorption rate (56%) of 2014-2020 RDPs compared to other Member States in June 2018.</p>

## 2.2.3. An approach to evaluate administrative burden



Ms Katarina Carthew, Programme Evaluator at the Swedish Board of Agriculture.

Ms Katarina Carthew from the Swedish Board of Agriculture gave a presentation about an evaluation conducted in Sweden during 2023-2024. Part of the evaluation is about understanding how specific simplifications implemented for the current CAP period (2023-2027) have changed the administrative burden for governmental administration and beneficiaries. Evaluation criteria included in this evaluation are efficiency and effectiveness.

**Link to Ms Carthew's presentation:** [An approach to evaluate administrative burden](#)



## After the presentation, participants posed the following questions and/or comments

<p>The <b>Polish MA</b> asked how the beneficiaries were chosen to participate in the research group.</p>	<p><b>Ms Carthew</b> explained they have contact information for all beneficiaries and so a large number of farmers received the survey.</p>
<p><b>A researcher (DE)</b> asked if the survey was only sent to farmers or also other beneficiaries.</p>	<p><b>Ms Carthew</b> shared that the majority of the beneficiaries were farmers, but other types of beneficiaries also participated.</p>
<p><b>A researcher (FR)</b> asked by which means (e.g. databases, structures) so many beneficiaries were contacted.</p>	<p><b>Ms Carthew</b> indicated that the MA has access to all the email addresses of applicants via their application system, which were given to the evaluators. Permission for sharing the contact details for evaluation purposes had to be given by applicants when submitting their application to ensure General Data Protection Regulation (GDPR) compliance.</p>
<p><b>Ms Parissaki</b> asked if the survey was sent to all beneficiaries in the database, or to a selection of beneficiaries.</p>	<p><b>Ms Carthew</b> replied that a selection was made, but as the evaluation covered the support scheme on direct payments, almost all beneficiaries received the survey.</p>
<p>The <b>French MA</b> asked how recommendations were ensured to be followed.</p>	<p><b>Ms Carthew</b> specified that each recommendation had an identified 'owner'. Every year, the evaluation secretariat at the Swedish MA goes to the various 'owners' and asks for an update on how the recommendation has been addressed. The received update is summarised and included in the reporting to the Monitoring Committee.</p>
<p>The <b>Polish MA</b> asked if the Swedish CSP is being changed based on the recommendations.</p>	<p><b>Ms Carthew</b> answered that many recommendations are relatively concrete and concern specific parts in the administration e.g. removing or changing cumbersome steps. In Sweden, this evaluation was purposely conducted early in the period so there was enough time to make improvements based on the evaluation, during the current period of 2023-2027. There are some recommendations that are more linked to the design of specific support schemes and those recommendations are more difficult to implement during current period and can be considered for the next CSP. Some of the recommendations cannot be implemented fully because of existing regulations.</p>
<p><b>An evaluator (IT)</b> agreed that communication is a crucial aspect of evaluations and asked how the collective participatory meetings with all actors were organised.</p>	<p><b>Ms Carthew</b> explained that she had various meetings with the identified owners of the recommendations. During the first meeting, some of these individuals were more hesitant to take on a recommendation but grew into ownership of them over time. Generally, at the end of an evaluation, an online seminar is organised where evaluators can present results and a panel discusses the evaluation and the identified recommendations. To better reach beneficiaries, they wrote several blog posts to show the results.</p>

After the presentations, participants brainstormed on what aspects/elements should be measured/analysed during an assessment of simplification of the CAP, including what challenges could be encountered. The brainstorming was guided by an overview of previously identified categories and aspects in relation to simplification that can be adapted by MAs. A complete list of the outcomes of the discussions is provided in [Annex 1](#).



## 3. Day 2 – Increasing knowledge on how to assess simplification in the future

### 3.1. Sharing experiences

#### 3.1.1. Cases and experiences from Spain



Mr Javier Ramos Delgado, Evaluator at Tragsatec, and Ms Raquel Diaz Molist from the Spanish MA.

Ms Raquel Diaz Molist from the Spanish MA and Mr Javier Ramos Delgado from Tragsatec presented the current Spanish simplification evaluation. It focuses on the administrative burden for administrations and beneficiaries, as well as on the relationship between them, while also considering digital tools as a key tool to meet Spanish CSP objectives. The evaluation has to address the challenges of Spanish governance with regionalised programming. Therefore, the evaluation must take into account these two levels (national and regional) to obtain meaningful and complementary results in a summative framework.

**Link to Ms Diaz Molist and Mr Delgado's presentation:** [Cases and experiences of Spain](#)

#### After the presentation, participants posed the following questions and/or comments

As Spain has one national evaluation and 17 regional evaluations, **an evaluator (IT)** asked how the 17 different regional evaluation contracts were managed, if any minimum requirements for regional MAs were put in place and if there are any mandatory elements of the regional evaluations that must be provided to the national evaluation, etc.

**Mr Delgado** stressed its complexity. It is a summative evaluation and the purpose of the indicators was discussed with the regional MAs to ensure harmonisation and construct a useful general matrix.

**Ms Diaz Molist** further clarified that the first step was to set up a steering group with regional MAs and their evaluation teams, different units of the Spanish Ministry of Agriculture and their evaluation team. Several meetings took place to discuss two coordinating documents: evaluation guidelines and the evaluation matrix. The finalised coordinating documents were shared with the regional authorities, along with encouragements to follow them for evaluating simplification. However, the documents are not mandatory, as the regional authorities are aware that they need to be adapted to the reality of the region. She clarified that the regional MAs are not obliged to evaluate simplification, but various regions evaluated this topic during the previous CAP programming period and have a positive attitude towards it. More specifically, various regional authorities proposed to evaluate simplification when the evaluation plan was being developed due to its significance.



## After the presentation, participants posed the following questions and/or comments

<p>On the governance section, <b>a researcher (DE)</b> asked for clarification on how the indicator related to the percentage of measures that have reduced costs for beneficiaries is measured.</p>	<p><b>Mr Delgado</b> confirmed that this is an indicator that has been proposed. In the first stage, as long as the interventions are not applied, the interventions that have included simplification measures may have an impact on costs are being analysed. For example, fewer documents, fewer requirements to be checked, cross-referencing with other computerised administrations and simplified costs.</p> <p><b>Ms Diaz Molist</b> added that one of the purposes of the Spanish CSP was to simplify the measures. In the payments of the RDP, the objective was to increase the simplified costs, which is an example to take into account for this indicator.</p>
<p>Regarding the use of digital tools, the <b>Swedish Board of Agriculture</b> commented that their purpose would be to simplify, which could be the case for the administration but not necessarily for the beneficiaries. Therefore, the question is whether it was assumed that the digital tools are user-friendly and make life easier (as they are often not), and if the experience of using such digital tools is also assessed.</p>	<p><b>Ms Diaz Molist</b> responded that in the ministry there are colleagues working on the development of an integrated system that includes many databases at different levels (i.e. national and regional) to simplify the life of farmers. This avoids the repetition of asking the beneficiary the same question multiple times. Moreover, a survey will be sent out soon which includes questions on the use of such digital tools and their experiences.</p>
<p>As the presented evaluation is to be used as a baseline for an evaluation that will take place in 2027, the <b>Romanian MA</b> asked whether the same methodology and evaluators would be used for the evaluation in 2027.</p>	<p><b>Ms Diaz Molist</b> explained that there is a contract with the evaluation team until 2026, so it cannot yet be said that it will be done by the same evaluators afterwards. Regarding the methodology, she clarified that further discussion within the steering group would take place on how the current evaluation went, so further updates to the current methodology might follow, though the focus will remain the same.</p>
<p>The <b>Polish MA</b> asked about how assessing simplification encourages setting up young farmers, as the use of digital tools may not encourage this.</p>	<p><b>Ms Diaz Molist</b> shared that the Spanish MA tried to ensure that the meaning of young farmers was the same in Pillar 1 and Pillar 2, which simplified the life of young farmers. Furthermore, she stated that young farmers are more able to use digital tools and do not see them as a burden but more as a way to improve profits. Therefore, the Spanish MA is sure that the use of digital tools to simplify processes would make the idea of becoming a farmer more attractive. In addition, other simplification measures are being considered, such as simpler intervention designs and guiding young people during the incorporation process.</p>
<p><b>The Italian National Network</b> asked for more details on regional baselines regarding simplification, more specifically on how to demonstrate the difference between the costs before and after the implementation of an intervention.</p>	<p><b>Ms Diaz Molist</b> emphasised that the goal of the presented evaluation is to establish a baseline, for instance on costs, and that in 2027 the same aspects will be assessed. Therefore, one will be able to see the differences in costs, if any exists.</p>
<p>Following the provision of the evaluation matrix by the national MA, the <b>French MA</b> asked whether it was up to regional authorities to tender out the evaluation contracts and if the national MA shares a calendar on when the results from the regional evaluations are expected.</p>	<p><b>Ms Diaz Molist</b> replied that it is not mandatory for regional authorities to implement an evaluation on simplification, but it is expected that 16 out of the 17 regional authorities will implement such an evaluation. A timeline has been agreed with the regional authorities: by the end of 2025 the regional evaluations should be completed so the national MA will undertake the synthesis.</p>
<p><b>A representative of DG AGRI</b> asked whether the costs will also be estimated on monetary items.</p>	<p><b>Ms Diaz Molist</b> confirmed that estimation will be made on monetary items and on time spent.</p>



### 3.1.2. Administrative burden for farmers – Insights from EU level studies



Mr Thomas Krüger, Principal Consultant at Ecorys (left) and Mr Marco Mazzei from Cogeia-Bip Group (right).

Mr Thomas Krüger (Ecorys) presented methods and challenges related to the quantification of administrative burden for CAP beneficiaries, also in connection with a previous study on the topic of administrative burden<sup>4</sup>. Mr Marco Mazzei (Cogea-Bip Group) then showed some preliminary findings (i.e. the most burdensome tasks and requirements) gathered from farmers who apply for CAP funding from the ongoing study on simplification and administrative burden for farmers. The study is carried out by the European Evaluation Helpdesk for the CAP (to be published in early 2025). He touched upon the study's approach to the analysis of sources of burden (EU/national legislation) and options for policy simplification.

**Link to Mr Krüger and Mr Mazzei's presentation:** [Administrative burden for farmers – Insights from EU level studies](#)

#### After the presentation, participants posed the following questions and/or comments

<p>Regarding the category 'time spent by farmers to apply for funds', <b>a researcher (FR)</b> asked if more information was known on the answer 'more than six days' and if it was possible to quantify these answers.</p>	<p><b>Mr Krüger</b> indicated that the results shown stem from the threshold defined by the targeted consultation performed by DG AGRI at the beginning of 2024 among farmers on simplification opportunities. The high number of people indicating 'more than six days' was surprising and when prompted how many days the range indicated was extreme (e.g. from six days to almost a year). During the interviews, the same question was asked and the results are being compared. For the moment, there is not a definite answer, but clear information should be collected soon.</p> <p><b>Ms Djja (DG AGRI)</b> clarified that this referred to the time spent on average per beneficiary on administrative tasks on CAP funding applications and conditionality.</p>
<p><b>An evaluator (IT)</b> found it important to share the different typologies of interventions covered during the study and asked if this would be shown in the final results.</p>	<p><b>Mr Mazzei</b> explained that the goal is to look (to the extent possible) into details of different schemes and types of interventions, but also other variables (e.g. size of farms). He shared that the targeted consultation was able to gather that 60% of farmers use external support to apply for CAP funding, so the knowledge of farmers on rules, aid schemes, etc. is limited and ideally further details are collected in the next stages of the study.</p>
<p>For the <b>Austrian MA</b> the number of working days was not clear and asked what it refers to and in which phase.</p>	<p><b>Ms Djja</b> shared that this concerned an entry point. The question was how much time you (as a farmer) spent a year on administrative tasks to complete CAP applications, including documentation for conditionality. The replies given by farmers are being further investigated in interviews.</p>

<sup>4</sup> European Commission: Directorate-General for Agriculture and Rural Development, Analysis of administrative burden arising from the CAP - Final report, Publications Office, 2019, <https://op.europa.eu/en/publication-detail/-/publication/dabd450b-9baf-11e9-9d01-01aa75ed71a1>.



## After the presentation, participants posed the following questions and/or comments

<p><b>A researcher (AT)</b> found that large estate farms spend a large number of days on CAP applications, so it was plausible that the time ranges for the targeted consultation (i.e., 'more than 6 days') would concern more than 360 days.</p>	<p><b>Mr Krüger</b> agreed that large farms could have full-time employees working on CAP applications and the breakdown across farm size is being looked into. However, the targeted consultation had 26 000 respondents, and around 7 000 respondents indicated that they had spent more than six days on administrative tasks.</p>
<p><b>The French MA</b> asked if it would be possible to receive the results of the interviews or to find out who has been interviewed in a Member State.</p>	<p><b>Mr Mazzei</b> explained that the study is to be published in early 2025. To select farmers for in-depth interviews, specific selection criteria were applied, such as granting permission to be interviewed when filling in the targeted consultation, balance in farm sizes, farming types, age, level of training of farmers and the number of people working on the farm.</p> <p><b>Ms Dyja</b> explained that preliminary findings from the targeted consultation have been shared with national Managing Authorities through EU level platforms and an overview can be found on the website of DG AGRI <sup>5</sup>.</p>

After the presentations, participants exchanged feedback and ideas regarding the preliminary findings (i.e. identified burdens for beneficiaries) of the study on simplification and administrative burden for farmers and other beneficiaries. Participants were also asked to indicate which identified burden(s) was/were most relevant for their Member State and whether these burdens were linked to EU regulations, Member State implementation choices or both. Finally, participants discussed/exchanged any other issues on how to assess simplification (e.g. factors of success, methods, data, indicators, etc.). A full list of the outcomes of the discussions is provided in [Annex 2](#).

<sup>5</sup> European Commission, Directorate-General for Agriculture and Rural Development, Farmers' consultation on simplification, 2024, [https://agriculture.ec.europa.eu/consultations-eu-initiatives-agriculture-and-rural-development/farmers-consultation-simplification\\_en#consultation-outcome](https://agriculture.ec.europa.eu/consultations-eu-initiatives-agriculture-and-rural-development/farmers-consultation-simplification_en#consultation-outcome).





## 4. Concluding remarks

The outcomes of the presentations and group discussions provided useful insights on what is most important to consider when assessing simplification, the key challenges, and ideas on how to measure administrative burden.

In relation to the **preparation phase** of programme design and implementation, the simplification aspects most relevant for Member States are the constantly changing regulatory framework and the heavy reliance of beneficiaries on external consultants.

Member States recognise there are **many rules from the European Commission that change frequently**, resulting in burdens for administrations (e.g. Paying Agencies spending excessive time on dealing with sanctions) and beneficiaries (e.g. more paperwork, uncertainty about new rules and delays in preparing applications). Assessing the extent to which changes in regulations enable the simplification of the policy is one of the key challenges. There are time and costs involved in changing rules and adapting to them. Suggestions on how to measure this aspect include developing a framework to categorise rules and regulations, focusing the assessment on the complexity and not the number of rules, clarifying the scope of changes and carrying out beneficiary surveys to collect information on the knowledge, expectations and concerns of beneficiaries in relation to the changing regulations.

**Heavy reliance on external consultants** entails higher administrative costs to submit applications. The main challenge is to understand the trade-off between the complexity of regulations and the support offered by consultants (e.g. are they biased? do they have excessive power?). Suggestions on how to measure this aspect include a comparison between the cost for beneficiaries to understand and comply with rules (e.g. administrative costs for beneficiaries to answer questions in relation to the application) and the cost of consultants and surveys to beneficiaries to obtain information on the added value of consultants.

In relation to the **application phase**, the simplification aspects most relevant for Member States are digitalisation and the number/complexity of application requirements.

**Digitalisation** is both a simplification measure (e.g. shortening application and monitoring processes) and a source of burden due to the costs involved in introducing it and the difficulties farmers face in using it (e.g. lack of skills, ageing farmer society). Balancing the costs and benefits of digitalisation is therefore the main challenge. To assess digitalisation, suggestions include comparing the costs of training/building the necessary skills with the cost savings from more efficient processes, comparing digital skills before and after digitalisation or assess the user-friendliness of digital tools through opinion surveys.

The **number and/or complexity of application requirements** particularly affects the beneficiaries who need to understand new rules (both EU and national) and conditions of existing measures or learn the content and requirements for applying to new measures (e.g. eco-schemes). The key challenge is how to communicate the requirements clearly to beneficiaries. There are several suggestions to assess this aspect, such as analysing any overlaps, 'training' beneficiaries on new requirements, measuring farmers that have been sanctioned and, similarly, measuring farmers that did not apply and analysing the reasons in both cases.

In relation to the **implementation and reporting phase**, the simplification aspects most relevant for Member States are related to the **amount and overlap of processes**, including the collection of time-consuming evidence resulting in too much paperwork and repeated reporting, often to different agencies. Suggestions to assess these aspects include developing a map of processes and analysing what is necessary and nice to have, what stems from regulatory requirements and what is additional, who the necessary recipients of the information are and who is secondary. In addition, it is suggested to measure the time spent on different processes and time saved on processes that have been simplified.

In relation to the **monitoring and control phase**, the aspects that produce the most burden for Member States are the **amount, frequency and/or redundancy of checks** (e.g. on-the-spot and ex post controls), the **lack of flexibility and proportionality** and the **perceived lack of transparency and clarity of rules governing the control and sanctioning process**. Assessing these aspects is challenging, notably because they affect administrations and beneficiaries differently, as the former needs to ensure the correct implementation of the policy, while the latter may refrain from applying in the future.

Suggestions on how to measure these aspects include mapping the conditions for interventions (e.g. eco-schemes) to try and balance them as more conditions lead to more checks without necessarily adding value. Another suggestion is mapping costs to understand and compare the costs of controls and those sanctions for both target groups (administrations and beneficiaries). Other suggestions include the comparison of ambitions versus actual achievements (e.g. do the results of interventions under green architecture justify its ambitious requirements) and the development of case studies to analyse whether similar audits and controls coming from different bodies could be merged.

An **overarching conclusion** is that assessing simplification as a component of efficiency should also consider the effectiveness of policy. Simplification should be pursued where it is necessary and avoid compromising the effects of interventions.

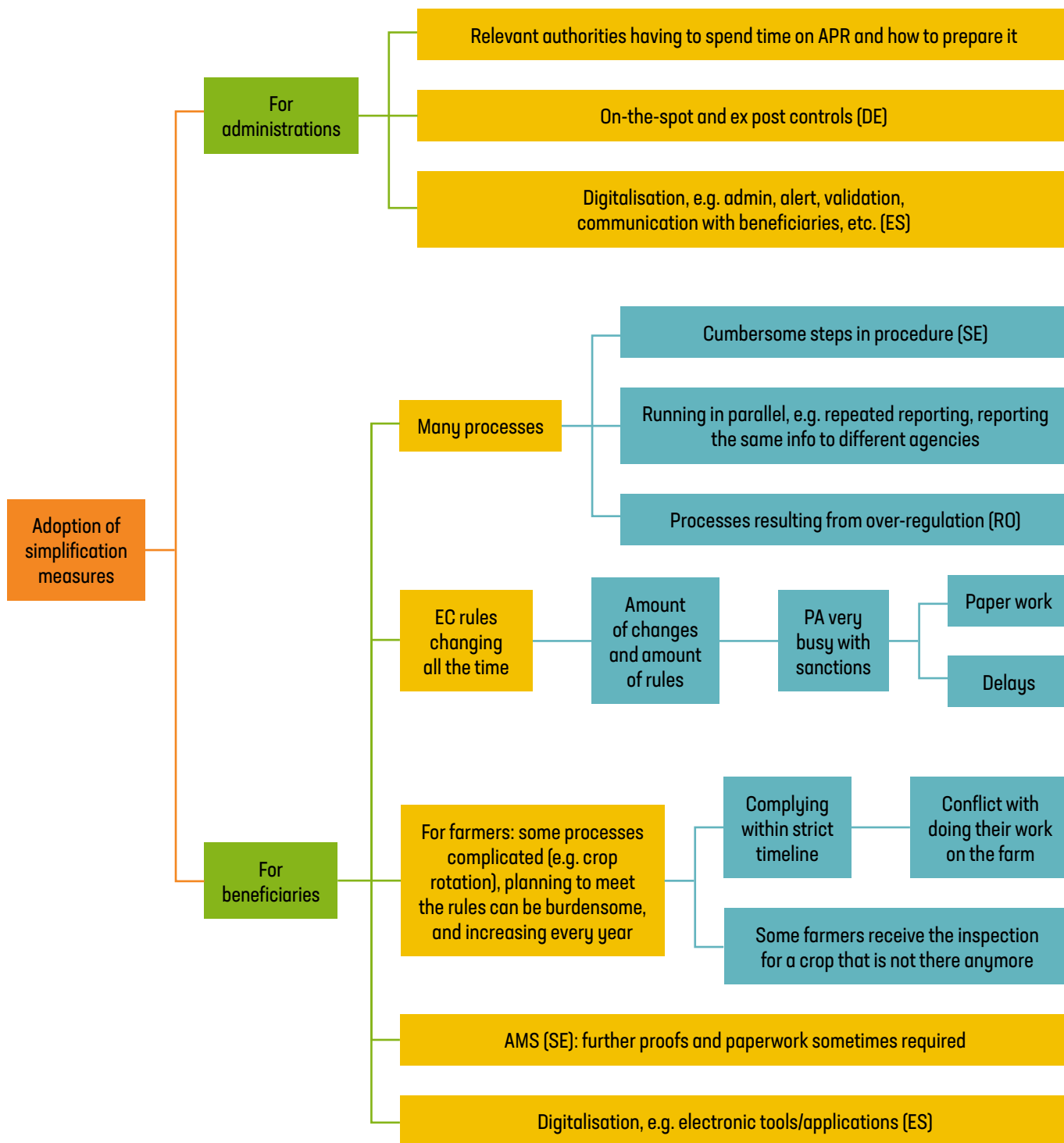


# Annex 1 - Results from group discussions day 1

Below is a full overview of the input from the GPW participants during the break-out discussions of day 1 when they brainstormed on what Member States should measure in relation to simplification, including challenges. Each discussion started on the basis of a pre-filled graph with the simplification category and specific aspects

of simplification that could be measured/taken into account when assessing simplification (figures below). Participants commented on these aspects and enriched them with more detail, while they also discussed potential challenges for assessing these simplification aspects (tables below).

**Figure 2. Simplification category 'adoption of simplification measures'**



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).



**Table 1. Comments and challenges in relation to the simplification category ‘level of adoption of simplification measures’**

Level of adoption of simplification measures		
Specific aspects	Comments on what to consider	Challenges
<b>Relevant for administration</b>		
Relevant authorities have to spend time on APR and know how to prepare for it	<ul style="list-style-type: none"> <li>&gt; Case studies on administrators to measure how much time it takes</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Time and resources needed for the APR</li> </ul>
Audits and controls (on-the-spot and ex post controls)	<ul style="list-style-type: none"> <li>&gt; Merge similar audits from different institutions (FR)</li> <li>&gt; Preparations for audits and replying to their findings (IT)</li> <li>&gt; Focus audits on certification bodies (IT)</li> <li>&gt; Differentiate on the spot versus remote controls in a case study</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to assess the regulatory framework before simplification</li> <li>&gt; On-the-spot controls are more difficult in the 2023-2027 CAP programming period</li> <li>&gt; The audits themselves are a challenge to simplification</li> </ul>
<b>Relevant for beneficiaries</b>		
Many processes run in parallel (e.g. repeated reporting, reporting the same information to different agencies), including cumbersome steps (SE) and processes that result from overregulation (RO)	<ul style="list-style-type: none"> <li>&gt; Compare legislation to see what comes from the EU and other Member States</li> <li>&gt; Simple reduction of the number of processes might be meaningful</li> <li>&gt; Check the time spent on applications' error code</li> <li>&gt; Test the process and how much time it takes</li> <li>&gt; For the application process, consider analysing the planning and definition of the call, the content of the call (new interventions; current interventions), the flexibility of specifications and the extent of support from administrations to fill in the application</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Overlap of multiple recording and reporting systems</li> <li>&gt; For farmers, some processes are complicated (e.g. crop rotation) and planning to meet the rules can be burdensome and increase every year</li> </ul>
The (amount of) Commission rules change all the time, meaning much more paperwork and delays and Paying Agencies are kept busy with sanctions	<ul style="list-style-type: none"> <li>&gt; Paperwork includes too much evidence and proof for investments</li> <li>&gt; Look into how farmers perceive changes in legislation</li> <li>&gt; Look into the impact of changing regulations on investments</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to assess the satisfaction of applicants, which is based on perceptions</li> <li>&gt; To what extent does change enable simplification of the system?</li> <li>&gt; Not much has changed over time, e.g. from SE: in 1996, there were 300 rules for farmers, and in 2020, there were 650 rules</li> <li>&gt; Insistence for changing policy (FI)</li> </ul>



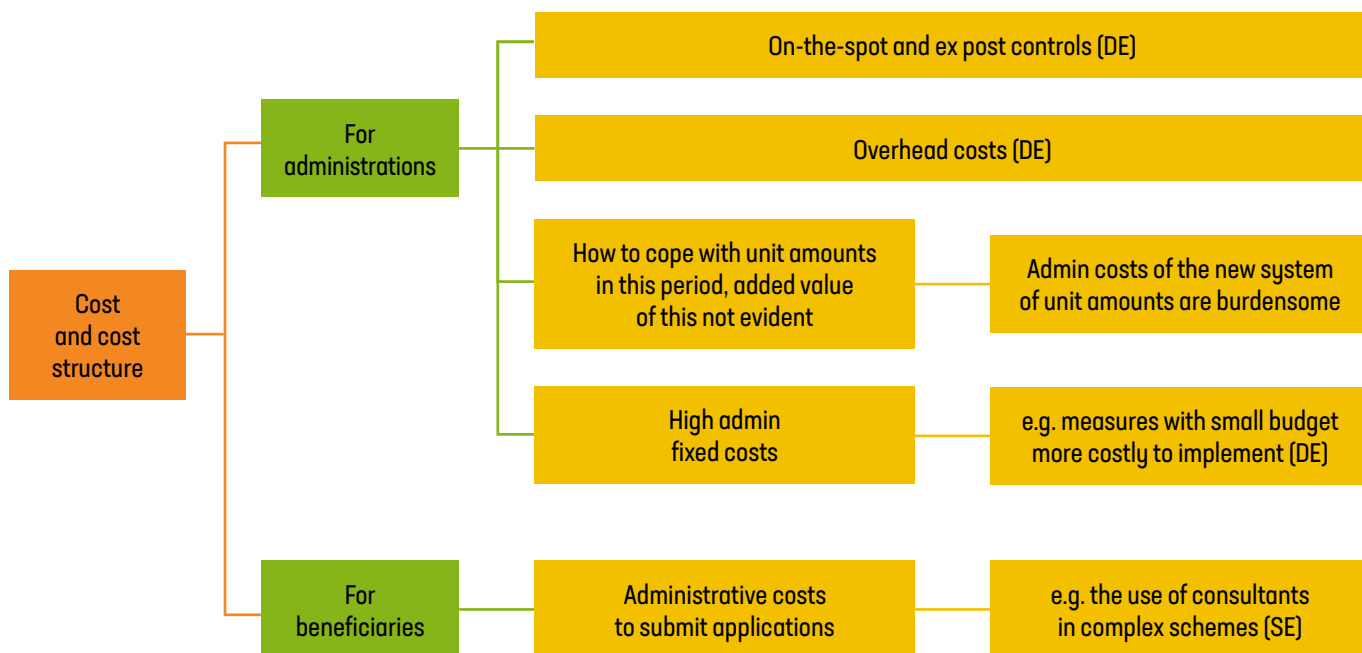
## Level of adoption of simplification measures

Specific aspects	Comments on what to consider	Challenges
Digitalisation, for example, electronic tools/applications (ES)	<ul style="list-style-type: none"> <li>&gt; Digitalisation implies more data collection but shorter time for payments</li> <li>&gt; Consider initial increases in burden but later improvements</li> <li>&gt; Capture the perceptions concerning the use of artificial intelligence through interviews</li> <li>&gt; Compare digital skills before and after the introduction of digitalisation</li> <li>&gt; Look at the number of IT systems, their complexity and their interoperability (SE)</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How is digitalisation conducive to simplification?</li> <li>&gt; Farmers challenged with IT systems and schemes (EL)</li> </ul>
General comments and challenges	<ul style="list-style-type: none"> <li>&gt; What is originating from the regulation? Check if objectives are the same, compare indicators (achievements), capitalisation on the calculation</li> <li>&gt; Look at the uptake of interventions</li> <li>&gt; Trade-offs between burden for administration and beneficiaries</li> <li>&gt; Careful selection of information sources (PL)</li> <li>&gt; Look into the level of frustration of staff as a proxy for burden (AT)</li> <li>&gt; Have the possibility to make changes to the CSP on Member State risk, also for direct payments (PL)</li> <li>&gt; Focus evaluation on user friendliness of the simplification measures</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to put together the perspective of new beneficiaries and administration</li> <li>&gt; Trust between administration and evaluators</li> <li>&gt; Trust between administrators to share datasets (AT)</li> <li>&gt; Rationalise the control to beneficiaries by sharing results (FR)</li> <li>&gt; Find/assess win-win solutions</li> <li>&gt; Does simplification give more output?</li> <li>&gt; The assessment of simplification measures requires cost information, so there is a need for the quantification of costs of the adoption of simplification measures (FR)</li> </ul>
Methods/approaches for the assessment	<ul style="list-style-type: none"> <li>&gt; Focus on specific aspects, asking, for example:                             <ul style="list-style-type: none"> <li>&gt; how relevant was simplification of X?</li> <li>&gt; was the timeline for implementation of simplification measures enough for farmers to understand everything?</li> </ul> </li> <li>&gt; Carry out surveys of farmers</li> </ul>	

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).



**Figure 3. Simplification category 'costs and cost structure'**



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).

**Table 2. Comments and challenges in relation to the simplification category 'costs and cost structure'**

Costs and cost structure		
Specific aspects	Comments on what to consider	Challenges
<b>Relevant for administration</b>		
On-the-spot and ex post controls	<ul style="list-style-type: none"> <li>&gt; Administrative cost for asking questions on applications and requests for documentation (ES)</li> <li>&gt; In regard to controls, the use of digital tools leads to changing costs for administration (ES)</li> <li>&gt; Cost to verify cross-compliance</li> <li>&gt; Cost for sanctions for beneficiaries and administrations</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Measuring cost of change</li> <li>&gt; Defining good questions</li> <li>&gt; Definition of key terms</li> <li>&gt; Time it takes to measure costs</li> <li>&gt; Assessment of potential trade-offs</li> </ul>
Overhead costs	<ul style="list-style-type: none"> <li>&gt; Cost of making it fit the specificity of interventions</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Unclear where the money comes from</li> <li>&gt; Psychological costs are difficult to quantify</li> </ul>



## Costs and cost structure

Specific aspects	Comments on what to consider	Challenges
How to cope with unit amounts in this period as the added value is not evident	<ul style="list-style-type: none"> <li>&gt; A lot of information is requested from farmers and asking unnecessary questions should be avoided or asking them twice (NL)</li> <li>&gt; Consider the interoperability of databases for simplifying the collection of data from farmers</li> <li>&gt; Determining factor is the complexity of planning</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Administrative costs of the new system of unit amounts are burdensome</li> <li>&gt; Understanding why things do not change</li> <li>&gt; Uncertainty/familiarisation</li> </ul>
High administrative fixed costs (e.g. from DE: measures with small budgets are more costly to implement)	<ul style="list-style-type: none"> <li>&gt; Should include costs to reach cross-compliance for beneficiaries (side costs)</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Ability of beneficiaries to understand where the requirements come from</li> <li>&gt; How to consider other costs (i.e. environmental, social)</li> </ul>
Coordination of structures	<ul style="list-style-type: none"> <li>&gt; AKIS coordination body and other structures may imply high administration costs (HR)</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to measure these costs</li> </ul>
Costs of digital tools	<ul style="list-style-type: none"> <li>&gt; In regard to digital tools, what is the performance of beneficiaries (cost versus investment)? (ES)</li> <li>&gt; How can artificial intelligence cut costs?</li> </ul>	<ul style="list-style-type: none"> <li>&gt; For digital tools, what is the difference between interventions and extra cost (e.g. nice-to-have versus must-have) (NL/ES)</li> <li>&gt; There is no permission to access databases (e.g. for EIP OGs) for personal information from beneficiaries (HR)</li> </ul>
<b>Relevant for beneficiaries</b>		
Administrative costs to submit applications, for example, the use of consultants in complex schemes (SE)	<ul style="list-style-type: none"> <li>&gt; Learning costs for beneficiaries to comply with/understand rules</li> <li>&gt; Asking farmers for updates and keeping up-to-date data (application stage) (NL)</li> <li>&gt; Remuneration of consultants may reveal the administrative cost (PL)</li> <li>&gt; Administrative costs to answer questions in relation to the application (ES)</li> <li>&gt; Costs for farmers are both in recording and reporting data (EL)</li> </ul>	<ul style="list-style-type: none"> <li>&gt; Estimate what is the equivalent cost of not having the intervention</li> <li>&gt; Simplifying regulations versus reliance on consultants (NL)</li> <li>&gt; Consultants helping beneficiaries with applications may be biased (PL)</li> </ul>



## Costs and cost structure

Specific aspects	Comments on what to consider	Challenges
Burden created by systems outside CAP	<ul style="list-style-type: none"> <li>&gt; What about professional organisations giving data to beneficiaries that are needed to satisfy application requirements (e.g. to apply for renewal energy support, farmers are required to do an analysis (study) which is done by professional consultants (HU))? (grey zone)</li> <li>&gt; These are costs for farmers to meet such requirements and sometimes it is not because of CAP, but because of national legislation (e.g. regulating production of renewal energy)</li> <li>&gt; Is there a way to reduce such costs (e.g. in Finland the advisory system is quite unified, and in other Member States it is diverse, and consultants provide analysis in line with their own approach)?</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to identify them?</li> <li>&gt; Organisations and services are constantly changing</li> </ul>
General comments and challenges	<ul style="list-style-type: none"> <li>&gt; Catalogue all requirements for interventions linked to costs</li> <li>&gt; Mapping of costs and difficult modifications</li> <li>&gt; Cost of introduction and implementation of results-based interventions</li> <li>&gt; Cost of negotiation and modification</li> <li>&gt; Cost of time saved by beneficiaries and authorities from the adoption of simplification measures</li> <li>&gt; One-off versus recurrent costs</li> </ul>	<ul style="list-style-type: none"> <li>&gt; To get data/information (e.g. personal) from farmers (e.g. due to lack of time) (NL/HR)</li> <li>&gt; How to assess costs but also benefits? (HU)</li> <li>&gt; Benchmark of implementation cost to compare with adopted measure (PL)</li> <li>&gt; Defining the cost structures and understanding the cost centres (PL)</li> <li>&gt; With regard to regionalised Member States, there is no clear information about the costs at regional level (FR)</li> <li>&gt; Perceived effort required for the management of each intervention to break down costs (IT)</li> </ul>

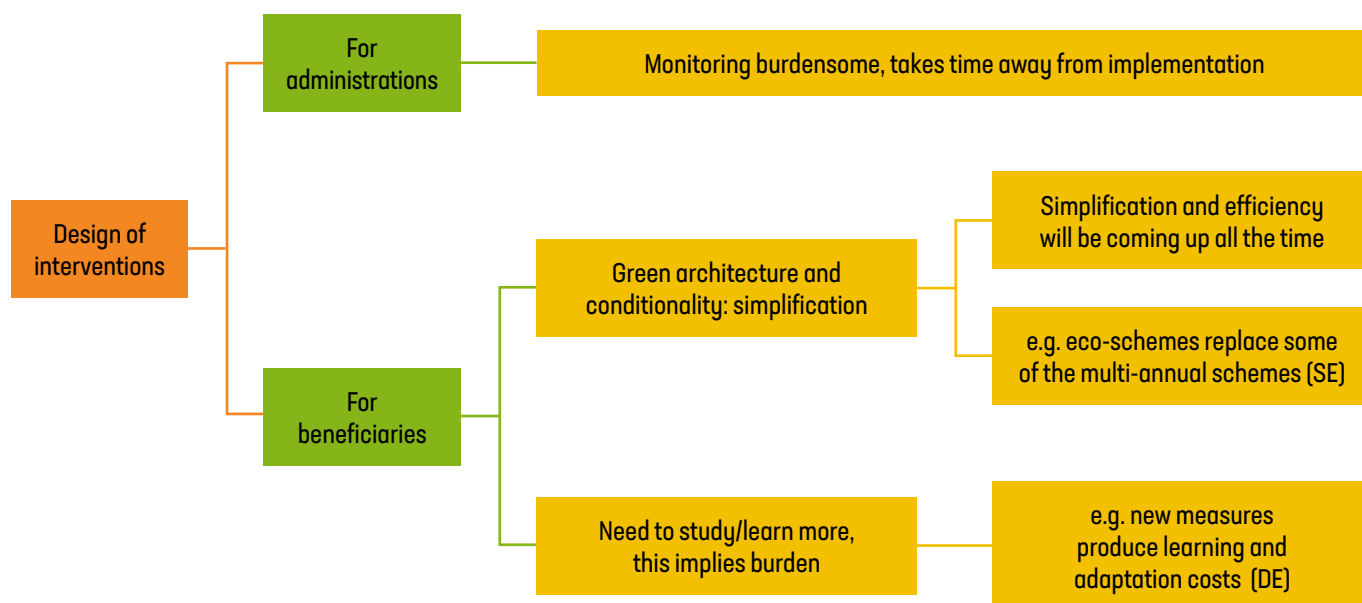
### Some suggested solutions

- > Authorities can pay a part of the cost of consultants to farmers (ES)
- > Provide incentives to farmers to share their data (ES)
- > In the FADN, they will start giving an economic incentive so farmers participate more, or benchmarking information (ES)
- > Information is only used for statistical purposes; they need to say this to farmers (ES)
- > Increase the quality of information from investments in simplification (e.g. digital tools, databases) and investments in governance structures (ES)
- > Asking data directly to the certification body may reduce costs, but this would mean more work for MAs (MT)

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).



**Figure 4. Simplification category 'design of interventions'**



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).

**Table 3. Comments and challenges in relation to the simplification category 'design of interventions'**

Design of interventions		
Specific aspects	Comments on what to consider	Challenges
<b>Relevant for administration</b>		
Monitoring is burdensome and takes time away from implementation	<ul style="list-style-type: none"> <li>&gt; Comparison of monitoring systems of several programming periods (e.g. 2014-2022, 2023-2027) (HU)</li> <li>&gt; Cost of setting up the unit amount and what benefit it brings</li> <li>&gt; Various outputs within one intervention (HU)</li> <li>&gt; In relation to costs, new technologies for monitoring and evaluation (BE-FL)</li> </ul>	<p>System-related:</p> <ul style="list-style-type: none"> <li>&gt; Is the institutional memory still there?</li> <li>&gt; Time for setting up (continuous change)</li> <li>&gt; Testing the system reporting</li> <li>&gt; How to compare capacity of systems (PT)</li> <li>&gt; In-house staff (low resource) (SK)</li> </ul> <p>Data-related:</p> <ul style="list-style-type: none"> <li>&gt; Consistency of data and search of most appropriate ones (DK)</li> <li>&gt; Data availability (AT)</li> <li>&gt; Data collection (SK)</li> <li>&gt; Distinction between entry and running costs</li> <li>&gt; How to reach beneficiaries (BE-FL)</li> <li>&gt; Representative sample of beneficiaries</li> </ul>





Design of interventions		
Specific aspects	Comments on what to consider	Challenges
Digitalisation of data and visualisation	<ul style="list-style-type: none"> <li>&gt; Cost of learning about data in the <a href="#">Agri-food data portal</a></li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to identify which are the right data to use (maybe sometimes less is more?)</li> <li>&gt; Who will decide on which data to use and for what?</li> </ul>
<b>Relevant for beneficiaries</b>		
Green architecture and conditionality: simplification	<ul style="list-style-type: none"> <li>&gt; Simplification and efficiency will be coming up all the time, for example, eco-scheme interventions replace some of the multi-annual schemes (SE)</li> <li>&gt; Balance of conditions as more conditions lead to more checks (CZ)</li> <li>&gt; Number of sub-measures; does it pay off to have many sub-measures (FI)?</li> <li>&gt; Regarding green architecture - what was/is the ambition and how it is translated into actual achievement (e.g. ambition to have small farmers in)?</li> <li>&gt; Renewable energy requires farmers to move, ideally (HU)</li> </ul>	<ul style="list-style-type: none"> <li>&gt; More conditions lead to more checks (CZ)</li> <li>&gt; To have data on what is the actual situation</li> <li>&gt; How to include different perspectives (beneficiary and administration)</li> </ul>
Need to learn more implies a burden, for example, new measures produce learning and adaptation costs (DE)	<ul style="list-style-type: none"> <li>&gt; Learning about both EU CAP and national regulations (BE-FL)</li> </ul>	<ul style="list-style-type: none"> <li>&gt; How to communicate to beneficiaries that the changes related to simplification are positive for them</li> <li>&gt; How to put together the point of view of beneficiaries and administrators</li> </ul>
<b>General comments and challenges</b>	<ul style="list-style-type: none"> <li>&gt; There is a need to have a working definition of 'simplification', which is developed in a specific context. This will bring common understanding and clarity on what exactly should be looked at during evaluation</li> <li>&gt; Look at unintended impacts: increasing the burden on beneficiaries</li> </ul>	<ul style="list-style-type: none"> <li>&gt; If there are constant changes, how does one assess? What is the baseline to take to compare any changes?</li> <li>&gt; Definition of simplification and for whom</li> </ul>

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).



## Annex 2 – Results from group discussions day 2

For the group discussions on day 2, preliminary findings of the 2024 study on simplification and administrative burden for farmers and other beneficiaries were grouped into the four phases of CAP support: preparation, application, implementation/reporting and monitoring/controls. Participants were asked to indicate which identified burden(s) was/were most relevant for their Member

State and whether these burdens were linked to EU regulations, Member States implementation choices or both. Finally, participants discussed/exchanged ideas on what to consider and how to measure these burdens (e.g. methods, data, indicators, etc.). The table below offers a complete list of the input from the GPW participants during the break-out discussions.

**Table 4. Feedback in relation to the preliminary findings (i.e. identified burdens) of the 2024 study on simplification and administrative burden for farmers and other beneficiaries**

Aspects of administrative burden	Relevant for your Member State	Is it linked to EU regulation or national choices?		
		EU	MS	Both
<b>1. Preparation</b>				
Constantly changing and unclear regulatory framework.	52	17	1	35
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>› Decision-making power at the EU level (Commission, Council of European Union and the European Parliament) can create burdens as this might add more rules throughout the co-legislative process of decision-making.</li> <li>› How much time and costs does changing the regulatory system (for both administration and beneficiaries) take?</li> <li>› The process of defining rules and implementing processes is too complex.</li> <li>› Adding new rules without removing previous ones.</li> <li>› Programme implementation takes time, leading to uncertainties for beneficiaries.</li> <li>› Future changes lead to inconsistency of regulatory frameworks.</li> <li>› The impact of RDP and national plans are not taken into account when assessing the new CAP.</li> <li>› Consider the time spent on getting used to new rules.</li> <li>› May affect administration and beneficiaries differently.</li> <li>› Member State/regional agenda versus overarching goal/target/intention of the programme.</li> </ul>				



Aspects of administrative burden	Relevant for your Member State	Is it linked to EU regulation or national choices?		
		EU	MS	Both
<p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Ask the question 'to what extent has the regulatory framework been stable'.</li> <li>&gt; Proposed survey question: how do farmers inform themselves and compare requirements of CAP programming periods.</li> <li>&gt; Proposed survey question: when do you need to know when a change is coming up?</li> <li>&gt; Proposed survey question: Do you know why there is a change (rationale) reasons behind rules?</li> <li>&gt; Clarify the scope of the changes i) between periods and ii) during the implementation.</li> <li>&gt; Analyse choices and examine what is beneficial for the environment (which requirement) of a territory: ecological or economic reasons.</li> <li>&gt; Look at the design of measure linked requirements for expected impacts (e.g. water quality).</li> <li>&gt; Balance between stability and opportunity to steer the policy according to emerging challenges.</li> <li>&gt; Percentage in sanctions if we change tolerance à scenarios.</li> <li>&gt; Focus on the most important sources of regulatory burden.</li> <li>&gt; Build trust between national and regional MA.</li> <li>&gt; Develop a framework to categorise rules.</li> <li>&gt; Distinguish between periods if they overlap.</li> <li>&gt; Measure the complexity of rules (the issue is not the number of rules).</li> <li>&gt; Compare the number of changes in EU regulation and number of changes in national rules.</li> <li>&gt; Apply analysis of delivery models.</li> <li>&gt; Is a results-based approach available?</li> </ul>				
<b>Poor information/communication from the authorities.</b>	<b>17</b>	<b>0</b>	<b>8</b>	<b>8</b>
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>&gt; External factors: market prices of products may skip requirements that lower yields.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Survey of different areas (IX/Year and IX/3 Years).</li> <li>&gt; Quantification &gt; filming application and recording process, which is the time Key Performance Indicator (KPI).</li> <li>&gt; Customer satisfaction survey.</li> <li>&gt; Feedback from farmers.</li> </ul>				
<b>Heavy reliance on external consultants.</b>	<b>27</b>	<b>6</b>	<b>8</b>	<b>14</b>



Aspects of administrative burden	Relevant for your Member State	Is it linked to EU regulation or national choices?		
		EU	MS	Both
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>› Explore the reasons for using consultants; this does not only indicate a burden (SE).</li> <li>› Improving regional advisors.</li> <li>› No list of consultants available in some Member States.</li> <li>› Complexity of application and power of consultants.</li> <li>› How to balance potential benefits?</li> <li>› Sometimes IT support includes consultants, and the number of hours it takes should be measured.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>› Cost of consultants (% of support).</li> <li>› IT costs for consultancies change frameworks.</li> <li>› Follow if an application has been filled by a consultant (if requirements change a lot, farmers will use consultants).</li> </ul>				
<b>2. Application</b>				
Complexity of application requirements (the efforts needed to fulfil time-consuming requirements exceeded the aid amount and made participation in the schemes not economically sustainable).	33		5	27
Lack of sufficient or clear information from authorities about the schemes or the rules for applying.	6		5	2
<b>Too many commitments are impossible to fulfil.</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>1</b>
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>› Large number of interventions for mixed farms: livestock, milk, cattle, etc.</li> <li>› Make the support scheme suitable for farmers: there cannot be impossible requirements.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>› Number of overlaps and the extent of overlaps.</li> <li>› Set up transition courses to adapt to a new regulatory framework/new commitments to reduce the burden.</li> <li>› Measure those that applied but have sanctions; a frequency of commitments that cannot be fulfilled.</li> <li>› What are the consequences for farmers? Who applied but got sanctioned?</li> <li>› Relevance: assess farmers who chose not to apply; why did they not?</li> </ul>				
Overlap of requirements.	8	2	6	2
Time-consuming work of collecting evidence.	21	1	0	18
<b>Digitalisation (technical problems, particularly with map drawing and use of IT systems).</b>	<b>44</b>	<b>0</b>	<b>26</b>	<b>18</b>



Aspects of administrative burden	Relevant for your Member State	Is it linked to EU regulation or national choices?		
		EU	MS	Both
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>&gt; It is a costly and challenging aspect to be assessed.</li> <li>&gt; To what extent is there a learning curve?</li> <li>&gt; Farmers are not comfortable with IT systems.</li> <li>&gt; Ageing farmer society means it is difficult to use IT systems. This may promote generational renewal of farmers.</li> <li>&gt; Depends on the region (DE).</li> <li>&gt; Land identification is difficult.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Database of requirements and analysis.</li> <li>&gt; The administration of regionalised Member States has difficulties in exchanging data between regions.</li> <li>&gt; Measure the time for training and time to build infrastructure to increase user friendliness.</li> <li>&gt; Assess user friendliness of digital tools.</li> </ul>				
<b>3. Implementation / Reporting</b>				
<b>Time-consuming paperwork related to evidence gathering and reporting obligations.</b>	<b>42</b>	<b>10</b>	<b>5</b>	<b>28</b>
<p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Financial clearance and unit amounts.</li> <li>&gt; Quantify what must be reported and what is nice to have.</li> <li>&gt; Number of parameters that must be reported and number of parameters that is nice to have but not a must.</li> </ul>				
<b>Recording is burdensome in the absence of digitalisation.</b>	<b>11</b>		<b>6</b>	<b>2</b>
<p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Number of trainings provided to beneficiaries related to digital tools.</li> </ul>				
<b>Repeated reporting.</b>	<b>1</b>		<b>6</b>	<b>5</b>
<p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Quantify if changes would happen without the CAP.</li> <li>&gt; Quantify the burden that administrations will have to learn in the future.</li> <li>&gt; More time is required by the farmer to quantify this additional time.</li> <li>&gt; Measure time spent by administrations to develop IT systems.</li> <li>&gt; Measure time saved for the administration from the introduction of digital tools.</li> <li>&gt; How much potential time would be ideal for performing specific tasks?</li> </ul>				
Reporting on multiple tasks/crops/activities.	6		1	4



Aspects of administrative burden	Relevant for your Member State	Is it linked to EU regulation or national choices?		
		EU	MS	Both
<b>Dealing with multiple authorities.</b>	<b>34</b>		<b>23</b>	<b>11</b>
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>&gt; Legal uncertainty, as the various regulations are not clear.</li> <li>&gt; Local/regional level.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Question to ask: how many authorities do you have to contact to submit your claim?</li> <li>&gt; Follow paperwork (i.e. the process) to identify if the necessary information has doubled or remained standard.</li> </ul>				
<b>4. Monitoring and controls</b>				
Time needed for preparation and the length of inspections.	13		2	11
<b>Frequency and/or redundancy of checks.</b>	<b>16</b>		<b>16</b>	<b>6</b>
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>&gt; Different by type of farm, e.g. organic versus conventional.</li> <li>&gt; Important for national discussions.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; To what extent have farmers access to information.</li> <li>&gt; Assess the flexibility of checks for public procurement.</li> <li>&gt; Number of programme modifications.</li> </ul>				
Inappropriate timing of controls, e.g. during very busy periods for farmers.	1	1		
<b>Lack of flexibility and proportionality (e.g. deadline not respected due to weather conditions).</b>	<b>32</b>	<b>6</b>	<b>4</b>	<b>18</b>
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>&gt; Flexibility would allow for more options instead of only one solution.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Extent to which deadlines are given in a range or can be adjusted by MAs.</li> <li>&gt; Simple qualitative ranking scale.</li> </ul>				
<b>Feelings of discomfort, uncertainty, incommunicability and mistrust towards inspectors.</b>	<b>16</b>	<b>1</b>	<b>7</b>	<b>10</b>
<p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Number of complaints.</li> <li>&gt; Ask whether timing of inspections is inappropriate.</li> <li>&gt; Talk to inspectors.</li> </ul>				



Aspects of administrative burden	Relevant for your Member State	Is it linked to EU regulation or national choices?		
		EU	MS	Both
<b>Transparency and clarity of the rules of the whole control and sanctioning process.</b>	<b>25</b>	<b>2</b>		<b>22</b>
<p><b>What to consider:</b></p> <ul style="list-style-type: none"> <li>&gt; Controls from EU on EIP-OGs looking for investments.</li> <li>&gt; Two sets of rules create complexity.</li> <li>&gt; It is not always clear to the MA what needs to be audit-proof, so the MA chooses the most certain option.</li> </ul> <p><b>How to measure:</b></p> <ul style="list-style-type: none"> <li>&gt; Studies would need to address the 'informal' rules to which a Member State is subject.</li> <li>&gt; Differences in controls between periods.</li> <li>&gt; Controlling LEADER EIP AGRI in the same way as agri-investment interventions.</li> </ul>				

In orange are those burdens that were discussed in the group discussions.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).

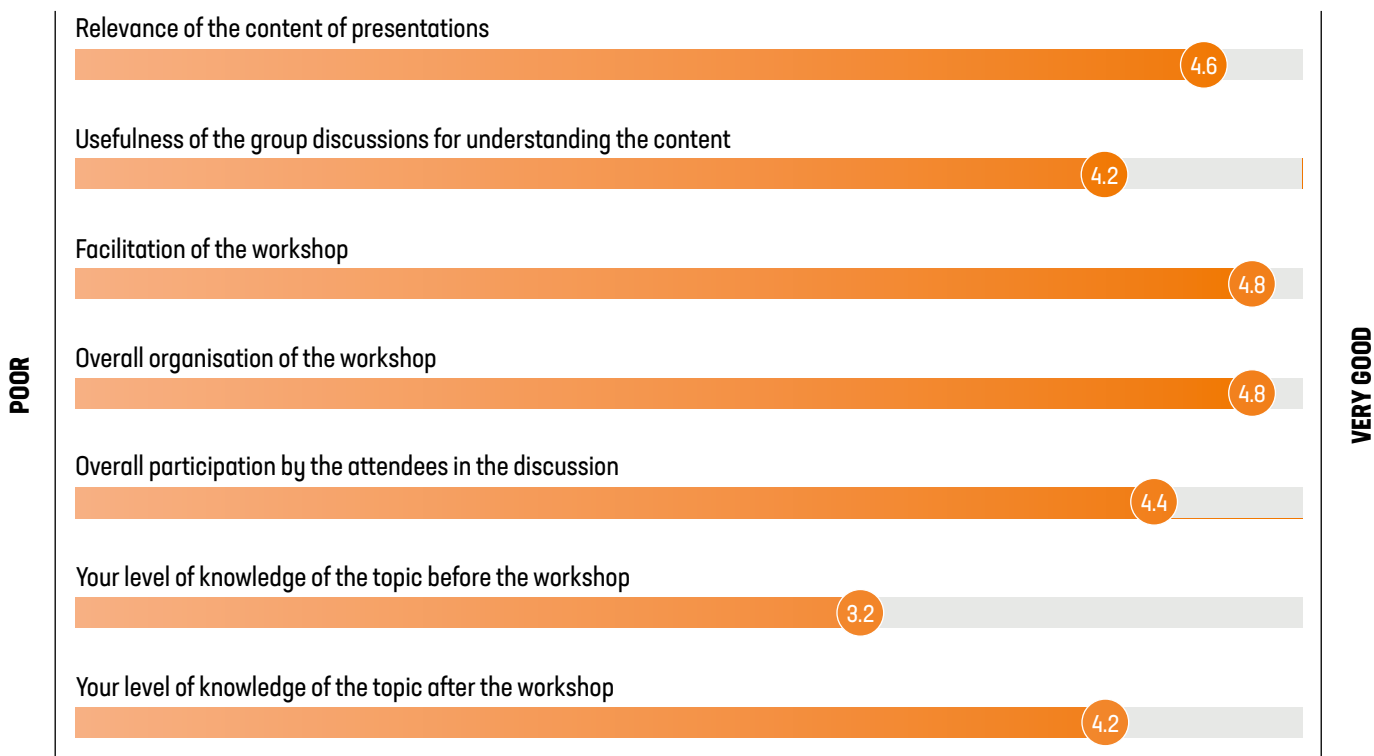


# Annex 3 – Results of the feedback poll

Please find below the outcome of the Mentimeter feedback poll on the GPW. The poll was launched in order to determine participants'

satisfaction with the workshop, as well as to get feedback on how future events can be improved.

**Figure 5. Overview of received feedback on the Good Practice Workshop from 50 participants**



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2024).







*Participants at the Good Practice Workshop on 'Assessing simplification of the CAP for beneficiaries and administrations', 7-8 November 2024, Budapest, Hungary.*



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