



EUROPEAN COMMISSION  
Regulatory Scrutiny Board

Brussels,  
Ares(2018)

## **Opinion**

### **Title: Evaluation / Greening of the Common Agricultural Policy**

(version of 23 February 2018)\*

### **Overall opinion: POSITIVE**

#### **(A) Context**

The Common Agricultural Policy (CAP) is composed of two 'pillars'. The first concerns direct payments to farmers while the second deals with rural development policy.

Under the first pillar, the 2013 CAP reform introduced a compulsory set of 'greening measures'. These were to promote climate and environmental benefits. Measures included crop diversification, maintenance of permanent grassland and ecological focus areas. They were a major innovation linking 30% of direct payments to specific practices. In 2016, 78% of all agricultural area in the EU were subject to at least one greening measure.

This evaluation examines how Member States implemented the green direct payments scheme over the period 2015-2016, and what the scheme is achieving.

#### **(B) Main considerations**

**The Board considers that the report provides a frank, informative and balanced account of the progress of the initiative.**

**The Board gives a positive opinion, but considers that the report should be improved with respect to the following key aspects:**

- (1) The report does not clearly explain what the evaluation was supposed to deliver, given the known time and data limitations.**
- (2) The report does not provide enough details on the relevance of the initiative. It does not elaborate sufficiently on the lessons learned so far to better inform the policy decision process.**
- (3) The report needs to better present the stakeholders' views, in particular those of farmers.**

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\* Note that this opinion concerns a draft evaluation report which may differ from the one adopted.

### **(C) Further considerations and recommendations**

**(1) Better explain what was expected of the evaluation.** The report could more clearly explain the initial objectives, i.e. the state of the initiative's implementation at the level of Member States. It could better delimit what the evaluation was expected to deliver, given the short reference period and the constraints of the analysis. Also, the analysis could be clearer on the reasons for the information gaps encountered during the evaluation and clarify how these could be resolved in the future.

**(2) The policy context** could be clearer on how the initiative is supposed to interact with other relevant policy initiatives, e.g. Natura 2000 and other environmental measures within the CAP.

**(3) Improve the analysis of the relevance.** The report could provide a more in-depth analysis of the relevance of the initiative, with regard to the balance between environmental ambition and implementation flexibility for Member States. It could better explain whether further EU action is necessary, and what would be the consequences of the lack of appropriate measures. The report could also better explain the impact of thresholds and exemptions on the success of the greening measures.

**(4) Better describe the lessons learned.** The analysis should provide conclusions that build on the recommendations of the support study and the Court of Auditors report. The evaluation should better report on lessons learned from the implementation of the initiative to inspire further the policy decision process. It could also explain how to better link environmental performance to payments, without impeding the ability of farmers to innovate.

**(5) Better present stakeholders' views.** The report needs to present more comprehensively the views of various stakeholders, including from the REFIT Platform, on the different evaluation questions. Views of the agricultural sector and the farmers could be presented in more detail, especially with regard to regulatory burdens associated with greening.

*Some more technical comments have been transmitted directly to the author DG.*

### **(D) RSB scrutiny process**

**The lead DG is advised to ensure that these recommendations are taken into account in the report prior to launching the interservice consultation.**

Full title	Commission Staff Working Document, Evaluation of the greening in direct payments (Regulation 1307/2013)
Reference number	2017/AGRI/002
Date of RSB meeting	28/03/2018