



Council of the
European Union

088719/EU XXV. GP
Eingelangt am 18/12/15

Brussels, 18 December 2015
(OR. en)

15478/15

AGRI 688
AGRISTR 87

NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	Simplification in rural development - <i>Polish comments on the AOB point requested by the Belgian delegation¹ at the SCA on 7 December 2015</i>

Following the discussion on simplification in rural development that took place at the SCA on 7 December 2015 at the initiative of the Belgian delegation, Delegations will find in Annex a contribution by the Polish delegation.

¹ Doc. 14928/15

- I. Poland would like to thank BE for the proposals made. We believe that an in-depth discussion should be initiated to simplify the second pillar of CAP.

As regards the comments to the annual report on 2014-2020 RDP, PL fully supports the position of BE (items 2 and 3 of the document).

- II. As regards item 1, PL supports simplifications **concerning the information obligation with respect to informing the general public about the assistance received under EAFRD; however, PL has a slightly different approach, which details are mentioned below.**

Poland does not agree to imposing an information obligation on the beneficiaries of the area-based measures under 2014-2020 RDP and proposes keeping the current approach to this issue, like in 2007-2013 RDP. In turn, the existence of the information obligation with respect to investment operations seems legitimate.

As regards investment measures, due to a significant number of beneficiaries and a high number of the informational materials required (perishable posters that harm the environment), according to PL, we should focus on reaching the general population in the manner that is similar to the solutions applied in the 2007-2013 perspective. Poland proposes promoting operations whose value of support exceeds a certain limit, e.g. EUR 50 thousand – through information boards, or EUR 500 thousand – through advertising boards. Due to a diverse character of support, we suggest making the information obligation dependant on the amount of support received for the operation. Poland therefore postulates to withdraw from the information obligation if the support amount is less than EUR 50 thousand.

The current provisions of Reg. 808/2014, annex III, item 2(2.2), indicate that for each operation whose amount of support exceeds EUR 10 000 the beneficiary must inform about it at the operation location or at the seat of the beneficiary. Considering the fact that a LAG may implement several dozen operations under LDS that might exceeds the limit of EUR 10 000, and considering the fact that the visual information is to be placed at the LAG's seat, the transparency and visibility of information may be limited. A high number of posters may be particularly troublesome in more densely populated areas and in the areas of major natural or cultural significance.

Therefore it seems that the above proposal to approaching visual information within Leader will ensure sufficiently clear and transparent communication about Community co-financing the implementation of the operations within this facility.

- III. Poland again sustains its position as to restoring the principle that was in force in the 2007-2013 perspective, i.e. the ability to modify the programme three times in a calendar year.

Reducing the number of allowed changes per calendar year to one creates serious impediment both for the member states and the European Commission (EC). This approach makes the process of managing the programme very rigid for the member states and additionally results in that the modification request is longer. Therefore, EC must use more resources to issue an opinion regarding the said request. This restriction is most unfavourable at the initial stage of the Programme implementation.

- IV. Moreover, Poland moves to consider amending Annex V of the Regulation no. 808/2014 consisting in deleting the obligation to perform the first evaluation as early as in 2017.

Considering the delay in implementing programmes and the fact that the progress levels at the end of 2016 will be very low, it will not be possible to grant comprehensive responses to the evaluation questions. Also, Poland believes that it will be possible to provide answers to these questions in full in 2019 and in the ex-post evaluation of the Programme. Resigning from the said evaluation will largely reduce the administrative burden and will not negatively impact the efficiency of implementation of the reformed CAP.
