

# Study on ‘Simplification and administrative burden for farmers and other beneficiaries under the CAP’

European Evaluation Helpdesk for the CAP



Funded by  
the European Union





# Context

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

- hyperlink: [https://eu-cap-network.ec.europa.eu/publications/study-simplification-and-administrative-burden-farmers-and-other-beneficiaries-under\\_en](https://eu-cap-network.ec.europa.eu/publications/study-simplification-and-administrative-burden-farmers-and-other-beneficiaries-under_en)
- conducted between 03/2024 and 03/2025 by the EU CAP Network supported by the [European Evaluation Helpdesk for the CAP](#), under the guidance of DG AGRI's Unit A.3 (Policy Performance) of the European Commission (EC).
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# Study objectives

- Identify **key areas of complexity** for beneficiaries (i.e. administrative burden and compliance with requirements) related to the 2023-2027 CAP
- Identify the main **sources of burden** at the level of EU/Member State legislation
- Analyse potential **gold-plating** and the most important **simplification actions**
- **Quantify** administrative costs for beneficiaries

The analysis was based on **three Research Questions**



# Primary data collection tools

Data collection tool	Description
<b>Targeted consultation on simplification (TC)</b>	Launched by the European Commission in March 2024. <u>Almost 27 000 respondents</u> , mostly farmers, in all EU countries
<b>Follow-up interviews with farmers</b>	298 interviews with farmers (selected from participants in TC) in 27 Member States
<b>Questionnaire-based surveys to CAP beneficiaries</b>	Surveys directed to LAGs, POs, EIP-OGs, advisory services, wine growers/producers ( <u>limitation: low response rate or few MS represented in some cases</u> )
<b>Interviews with MAs, PAs, and MS stakeholders</b>	144 interviews in 27 MS (28 CSPs). MS stakeholders included farmer organisations, advisory services, evaluators, CAP network experts
<b>Interviews with EU-level organisations</b>	8 interviews with EU-level organisations representing farmers, other CAP beneficiaries (ELARD) and EU CAP network



## Overall approach and triangulation of findings

TC  
results

Explore farmers'  
perception

Capture  
perspective of other  
CAP beneficiaries

Complement findings  
with the view of MAs,  
advisory services and  
MS stakeholders

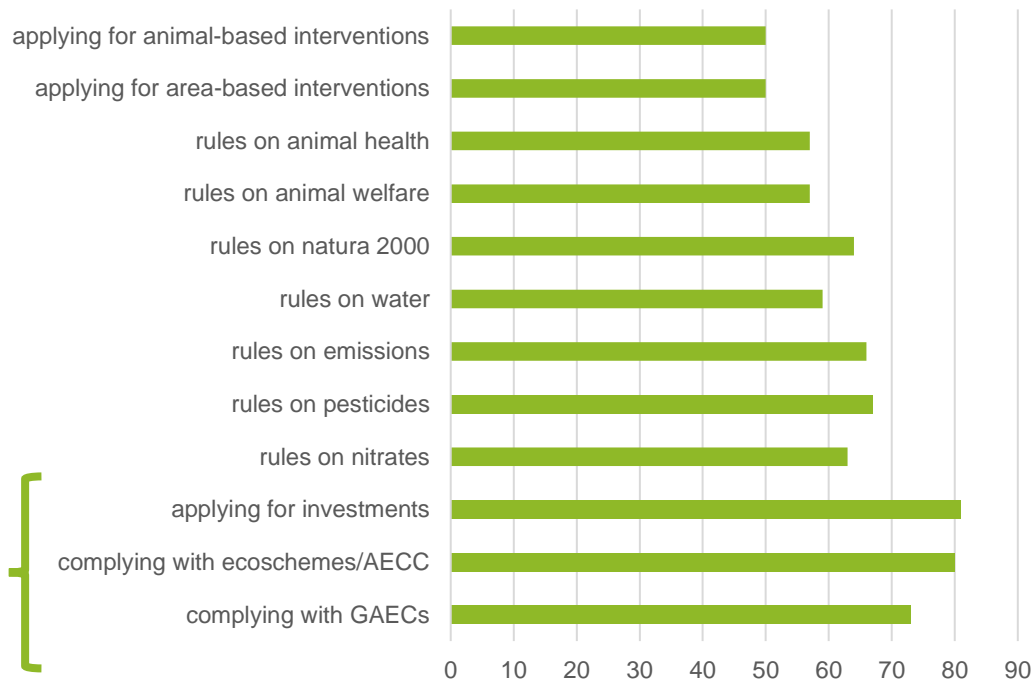
Drawing on the results of the EC's **targeted consultation on simplification (TC)**, the study explored farmers and other CAP beneficiaries' **perceptions on complexity, costs and simplification**. Other informants at EU and MS level helped complement and **triangulate findings**.



# Main areas of complexity according to TC respondents

**Targeted consultation:** respondents' perception of 'high complexity' related to the following areas

(% of responses, excluding 'don't know'/'did not apply')



**Results further explored through**

**Interviews with farmers**

«What are the three requirements that are most difficult to comply with?»

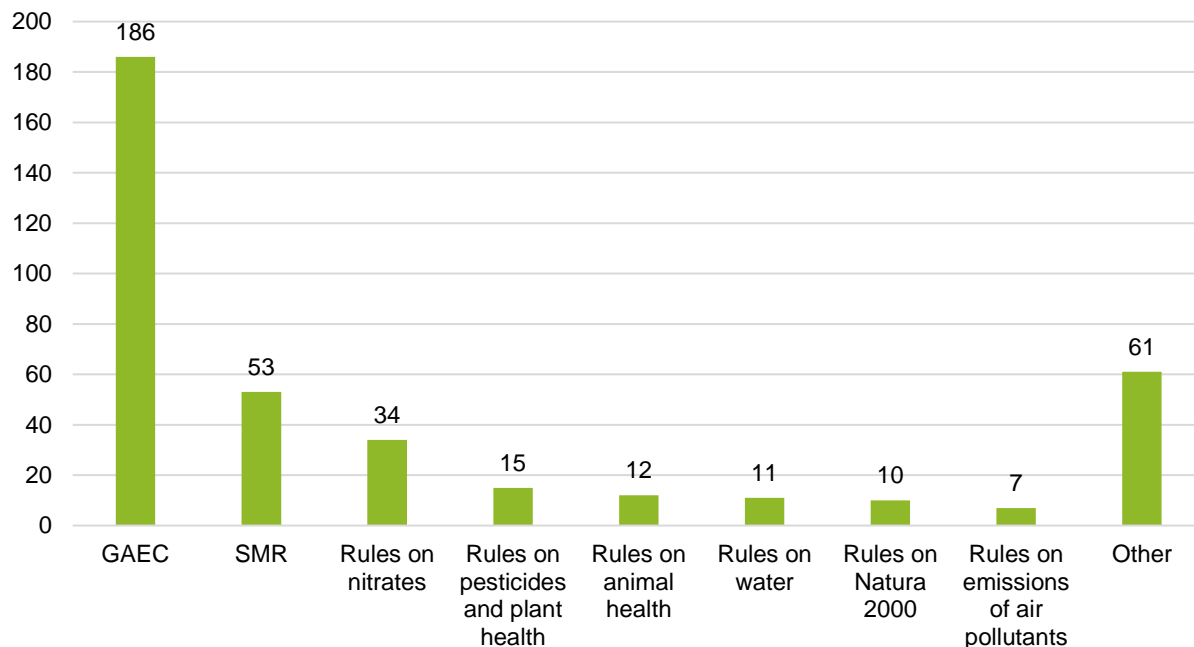
**Interviews with MAs, PAs and MS stakeholders**

«What are the CAP's main areas of burden (i.e. the most burdensome interventions and requirements)?»



## Main areas of complexity. GAECs and other environmental and sanitary requirements

**Interviews with farmers.** Frequency of the CAP requirements mentioned as the most difficult to comply with (number of citations)



GAECs were frequently cited as the most 'difficult' requirements (particularly **GAEC 8, 7 and 6 on soil**).

**142** citations of environmental and sanitary requirements **outside the CAP**. Among these, rules on **nitrates** (particularly **SMR 2**) were most frequently cited.

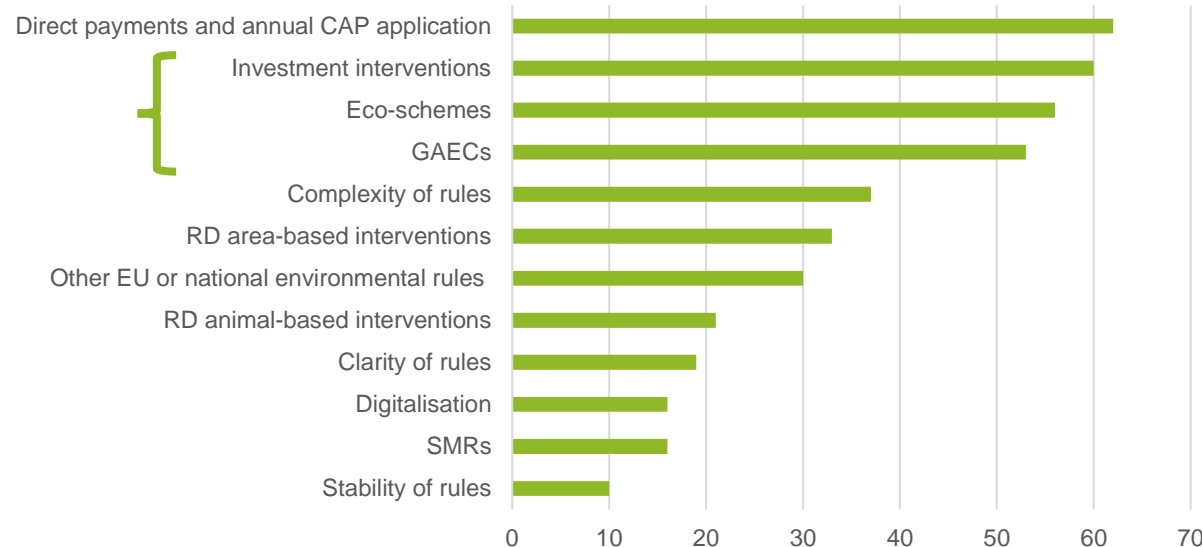


# Main areas of complexity according to interviewees at MS level

**Interviews with MAs, PAs and MS stakeholders.** Distribution of the main areas of burden for farmers and other CAP beneficiaries. Number of citations (each interviewee could select up to five areas of burden)

## CAP's main areas of burden

source: interviews with MAs, PAs and MS stakeholders



MS stakeholders confirmed the complexity related to **investments, eco-schemes and GAECs**.

The most cited 'area' was the **annual CAP application**, pointing to the complexity of the overall application process.

Some responses did not identify specific areas but referred to **horizontal categories** (e.g. complexity, clarity and stability of rules; digitalisation)



# Main causes of burden for CAP beneficiaries

The identification of the main causes of burden was based on an analysis of the lifecycle of CAP operations, considering 4 procedural steps: preparation, application, recording&reporting, controls

## Lack of clarity and communication from authorities

Late approval of legislation at all levels and no time to get familiar with the 'novelties' of 23-27 CAP (eco-schemes).

## Complexity of regulatory frameworks

- Frequent changes to EU regulations, CSPs and implementation documents (e.g. calls, procedures)
- Multiple layers of legislation, with overlaps or conflicts

## Excessive or repetitive information obligations

- Much information required when applying and reporting for investments
- Same information to be repeatedly reported to the same or different authorities

## Barriers to cooperation

- Staff and resource constraints reduce LAGs' administrative capacity
- Use of SCOs is still limited for LAGs and EIP-OGs

## Digitalisation issues

- Annual CAP application for direct payments. Issues with LPIS and geo-spatial application
- Lack of interoperability of information systems, leading to overlaps and redundancies

## Compliance issues and strict rule enforcement

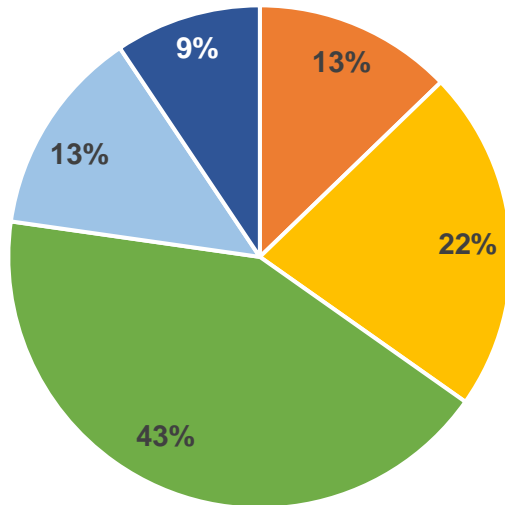
- Conditions are difficult to fulfil (e.g. investments in irrigation)
- Enforcement is perceived as rigid (e.g. sanctions apply irrespective of unpredictable events)

## Nature of difficulties for some GAECS

GAECS	Nature of difficulties (source: TC, % of responses)		Detail (source: interviews with farmers and MS stakeholders)
	Rules are not clear	Meeting requirement is difficult	
8. Non-productive features and areas	25%	41%	<b>Economic losses</b> due to reduced productive farmland Additional costs to revert land to production
6. Soil cover	23%	43%	Soil cover requirements and 'sensitive periods' do not always align with <b>local conditions</b> (e.g. soil, weather)
7. Crop rotation	17%	36%	Crop rotation/diversification is difficult for <b>small farms</b> (and farms with fragmented or rented land) and when the choice of crops is limited or unpractical for farms
4. Buffer strips along watercourses	21%	34%	<b>Unclear definition</b> of 'buffer strips' or 'polluted watercourse'; difficult map drawing.



«In relation to the main areas of burden, does the burden stem from EU or MS legislation?»



■ i. ■ ii. ■ iii. ■ iv. ■ v.

## Source of burden: EU/MS

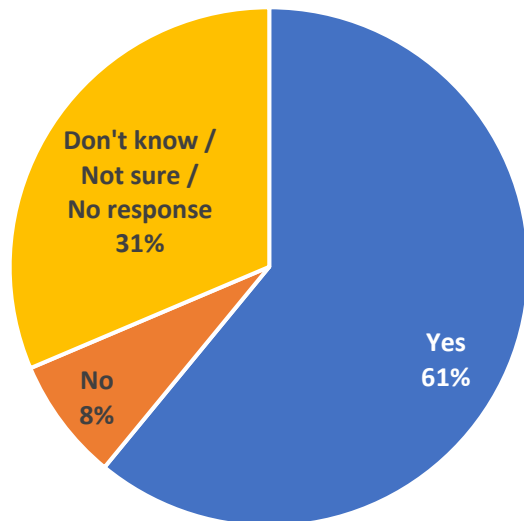
- › MS stakeholders were asked to identify the legislative source of the 'main areas of complexity' identified. Responses categorised burden as stemming:
  - i. Exclusively from EU
  - ii. Mainly from EU
  - iii. Equally from EU and MS
  - iv. Mainly from MS
  - v. Exclusively from MS
- › The share of burden stemming from MS choices is significant: 60% or more is attributed to choices for which MSs are regarded exclusively, mainly or at least equally responsible with the EU level (by MAs/PAs/MS stakeholders).





## Scope for burden reduction at MS level & potential gold-plating

«In relation to the share of burden stemming from MS responsibility, is there any scope for simplification?»



- 61% of MS stakeholders believe that there is scope for reduction of burden. Similar assessment by Advisory Services (source: survey).
- This, combined with the large share of burden stemming from MS choices, points to a large part of the conditions and requirements put in place by MSs being unnecessary for achieving the objectives of CAP, representing a potentially huge amount of gold-plating.





## Examples of simplification actions

Area	Examples of proposed or implemented simplification actions
<b>Advanced digitalisation practices</b>	<ul style="list-style-type: none"> <li>• pre-filled application forms (reusing data of the previous year) one-stop-shop platforms for application, tracking and communication</li> <li>• use precision agriculture to automate data collection</li> </ul>
<b>Streamlined implementation</b>	<ul style="list-style-type: none"> <li>• SCOs and draft budgets; umbrella projects</li> <li>• decision issued via e-mail; self-certification of compliance</li> <li>• inter-administration dialogue for faster procedures (e.g. building permits)</li> </ul>
<b>Simplification-driven programming</b>	<ul style="list-style-type: none"> <li>• reduce number of interventions</li> <li>• align CAP requirements and national standards</li> </ul>
<b>Enhanced flexibility</b>	<ul style="list-style-type: none"> <li>• tailor requirements to small farms</li> <li>• foresee derogations (e.g. for organic farms, rented land, adverse weather)</li> </ul>
<b>Communication, support and transparency</b>	<ul style="list-style-type: none"> <li>• early information campaigns</li> <li>• video-based guidance to implementation of GAECs</li> <li>• automated notifications for deadlines and updates</li> </ul>



# What is the administrative burden arising from 2023-2027 CAP for farmers and other CAP beneficiaries?





## Analytical approach and data sources

### Data sources:

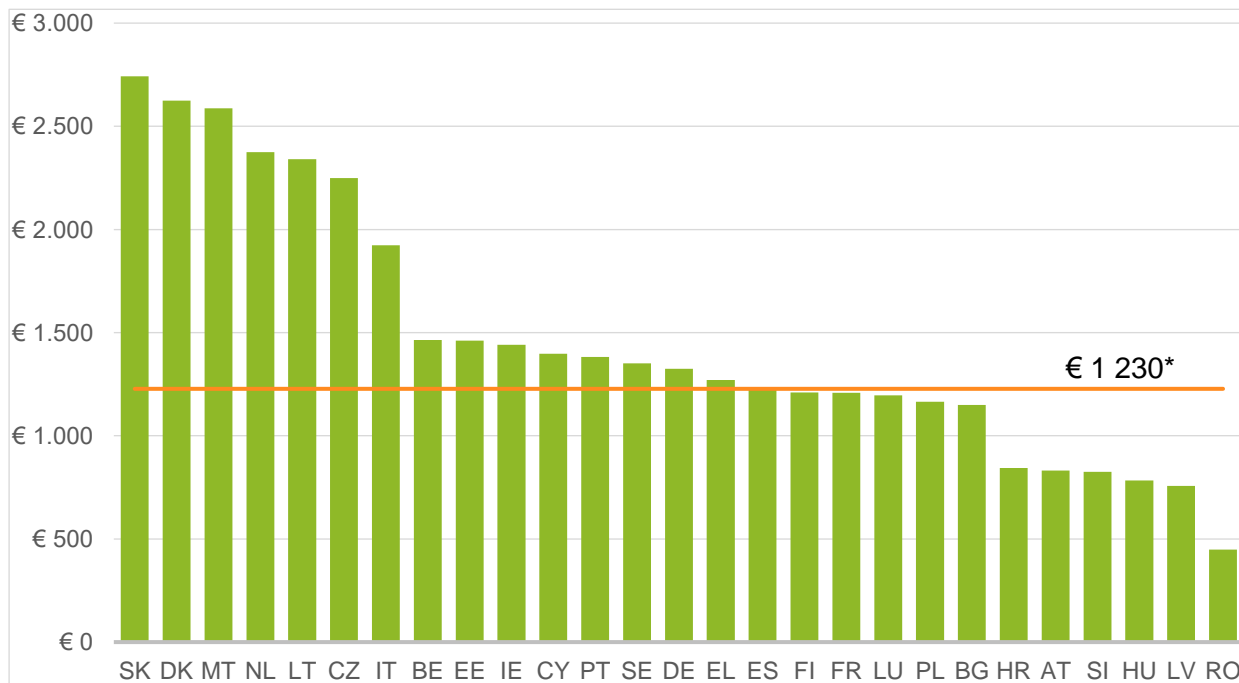
- ✓ For farmers: targeted consultation and farmers interviews
- ✓ For other beneficiaries (POs, wine growers & producers, LAGs, EIP groups, advisors): 5 targeted surveys

### Type of indicators retrieved:

- ✓ Time spent on administrative tasks related to the CAP + breakdown per activity (e.g. application phase, follow-up), monetised through FADN data
- ✓ Lump sums linked to the use of external assistance (i.e. advisory services)
- ✓ Only for other beneficiaries:
  - ✓ Possible duplication of request for information
  - ✓ Reliance on advisory services and related costs
  - ✓ ***For POs and wine growers: focus on the specific burden of sectorial interventions (where possible)***

## Key findings - Farmers

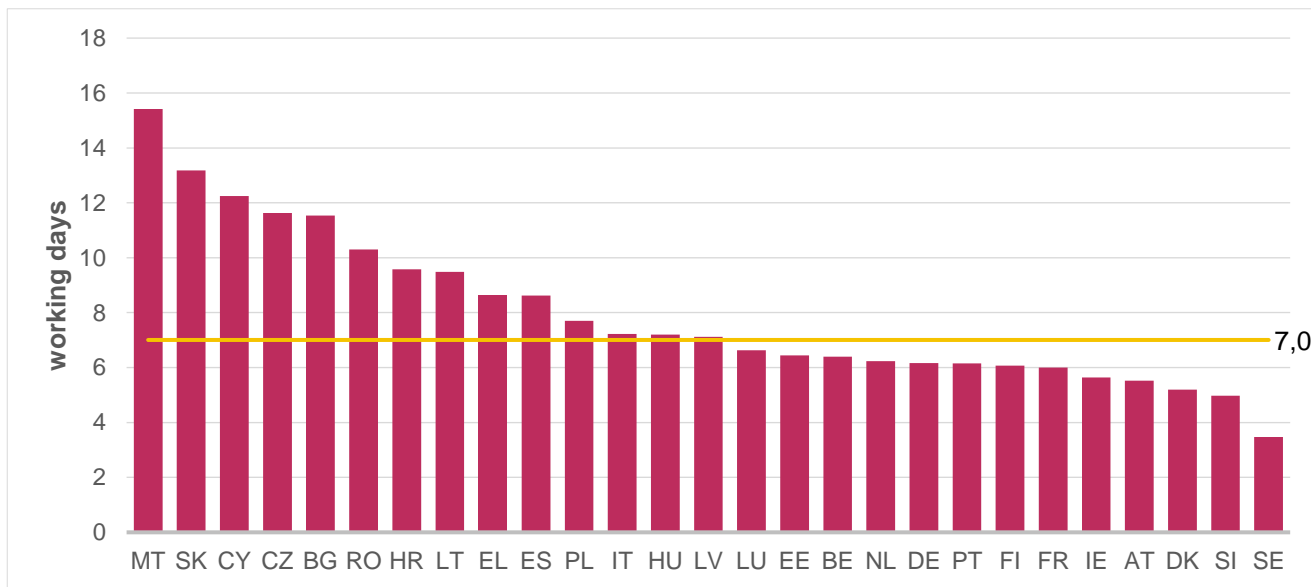
The average annual cost of CAP-related administrative tasks per farmer is **€1 230**, equally distributed across **internal costs** and **external costs** (i.e. use of advisory services).





## Key findings - Farmers

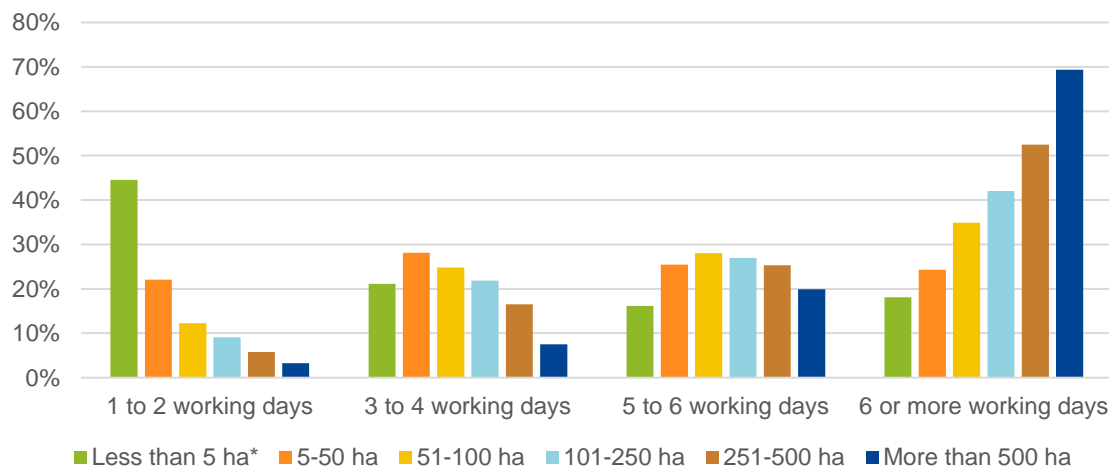
In terms of internal costs, on average, farmers spend **7 working days annually** on these tasks; however, the overall cost estimates are shaped by the treatment of responses and the methodological choices applied



## Key findings - Farmers

Clear relationship between farm size and the time required for CAP-related administrative tasks:

- ✓ Smaller farms (less than five hectares) tend to spend between one to four working days on CAP-related administration.
- ✓ Larger farms (more than 500 hectares) often report spending more than six working days on administrative tasks



→ Following the application of farm size weighting, the estimated EU average time spent on administrative tasks decreases to **5.6 working days per year**.



## Key findings - Farmers

For farmers: challenges in comparing current results with previous programming period (through a 2019 study on administrative burden, mainly linked to:

- ✓ Differences in sample size (122 interviews in 12 MS vs 21821 respondents in the Targeted consultation) and respondent profiles
- ✓ Different data collection methods and focus (e.g. controls not present in the previous study questionnaires)
- ✓ Absence of longitudinal data (tracking the same farmers over time)
- ✓ Differences in cost calculations (e.g. differences in wage rates, cost assumptions, and the inclusion or exclusion of certain ranges or outliers → direct monetary comparisons less reliable.

*→ Complicate direct, like-for-like comparisons and the attribution of observed differences solely to changes in administrative burden.*



## Key findings - Other beneficiaries

### Producer Organisations (POs) in the fruit and vegetables sector

- ✓ More than half of POs report spending over 100 days annually on CAP-related administrative tasks (highest figure across all beneficiaries), possibly driven by differences in POs sizes and by their role as intermediaries managing applications for multiple members.
- ✓ Sectoral interventions are particularly demanding, with 73 % dedicating over 10 % of their working time to these tasks and more than half finding them significantly more complex than other CAP measures.

### Wine growers and producers

- ✓ Wine growers spend an average of nearly 16 days annually on CAP-related tasks, with 14.33 days focused on sectoral interventions → possible inconsistencies in how respondents estimate their workload or understand sectoral interventions as a component of overall CAP tasks.
- ✓ Task related to sectoral interventions are perceived as more complex when they require higher time investments, particularly for those spending over 10% of their time on such interventions.



## Key findings - Other beneficiaries

### LAGs

- ✓ LAGs report significantly higher time commitments than other CAP beneficiaries, reflecting their focus on LEADER measures and local development strategies.
- ✓ Their administrative workload is shaped by the size of their teams, the volume of internal calls, and their reliance on internal management, with only 26 % using external assistance.

### EIP AGRI Operation Groups (OGs)

- ✓ Administrative burdens for OGs vary based on their diverse structures, team sizes, and project scopes.
- ✓ Like LAGs, OGs rely minimally on external support, leveraging their in-house expertise to manage CAP requirements.

### Advisory services

- ✓ “Double hat” → Advisory services balance their role as both beneficiaries and providers of CAP-related assistance.
- ✓ 71 % manage CAP applications independently → ability to navigate administrative requirements without external support.

# Get in touch

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