EU CAP NETWORK

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

May 2025

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Abbreviations

AI	Artificial intelligence
AKIS	Agricultural Knowledge and Innovation System
AMS	Area monitoring system
CEJA	European council of young farmers
CLLD	Community-led local development
Copa-Cogeca	Association of European farmers and agri-cooperatives
CSP	CAP Strategic Plan
DG AGRI	Directorate General for Agriculture and Rural Development
EAFRD	European Agricultural Fund for Rural Development
EAGF	European Agricultural Guarantee Fund
EIP-AGRI	European Innovation Partnership for agricultural productivity and sustainability
ELARD	European LEADER Association for Rural Development
ELO	European Landowners' Organisation
ESIF	European Structural and Investment Funds
FADN	Farm Accountancy Data Network
FAQ	Frequently asked question
FTE	Full-time equivalent
GAEC	Good agricultural and environmental condition
GIS	Geographic information system
IACS	Integrated administration and control system
ICT	Information and communication technology
LAG	Local Action Group
LDS	Local Development Strategy
LPIS	Land parcel identification system
MA	Managing Authority
MS	Member State
NDM	New delivery model
OG	Operational Group
OP	Operational Programme
PA	Paying Agency
PO	Producer Organisation
RDP	Rural Development Programme
SCO	Simplified cost option
SMR	Statutory management requirement
SWD	European Commission staff working document
TC	European Commission's targeted consultation on simplification

2023-2027 CAP interventions

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

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1. Introduction

The overall aim of the 'Study on simplification and administrative burden for farmers and other beneficiaries under the CAP' was to support DG AGRI in understanding and assessing the burden on farmers and other beneficiaries arising from the 2023-2027 CAP and drawing conclusions for policy simplification.

Specifically, the objectives of this study, which covers all 27 Member States of the EU and the respective 28 CAP Strategic Plans (CSP), were to:

1. Capture and analyse the beneficiaries' and advisory services' perspectives on the key sources of administrative burden and the difficulties arising from compliance with the requirements related to the implementation of the 2023-2027 CAP.
2. Assess the burden for beneficiaries and identify burdens stemming from EU level CAP legislation and burdens linked to Member State implementation choices and possible gold-plating.
3. Draw conclusions on the most important simplification actions/areas from the CAP support beneficiaries' perspective.

The analysis is based on data and information collected from various sources. It draws on the European Commission targeted consultation (TC) on simplification [1], that was open from 7 March to 8 April 2024 and allowed to collect information from about 27 000 farmers. The TC results were reinforced through interviews with a sample of farmers participating in the consultation and complemented/triangulated with surveys and interviews with other CAP beneficiaries and stakeholders at EU and Member State level.

The analysis of administrative burden and simplification is therefore based on the experience and perceptions of CAP beneficiaries and stakeholders who provided their views.

The contents of the report are organised in the following chapters. Chapter 2 illustrates the background of the study, including the policy framework and an overview of the relevant literature. Chapter 3 describes the methodology, defines the key terms and concepts, presents the research questions, provides an overview of data collection tools and clarifies the limitations of methods and data. Chapter 4 presents the study findings and the answers to research questions. The fifth and last chapter illustrates the overall conclusions of the study.

2. Background to the study

2.1. The policy framework

The 2017 public consultation on 'Modernising and simplifying the CAP' has identified the excess of bureaucracy as an obstacle to the success of the CAP. In answering the questionnaire, farmers and other respondents have expressed agreement with the majority of the proposed solutions for a simpler and more flexible policy, from "reducing overlaps between rural development and other CAP measures" to "giving more choice to farmers in terms of environmental measures" and "making better use of technology to reduce the incidence of inspections" [2].

The amount of documentation and paperwork required by the CAP, the frequency of inspections and the lack of transparency surrounding them, and the complex and sometimes inconsistent rules to be respected were, among other factors, generally perceived as burdensome and "understood as putting a barrier to innovation and investments in the agricultural sector" [3].

The complexity of CAP instruments that are in turn linked to the diversity of EU agricultural systems and contexts (CAP policy brief on driving simplification) [4] and the inescapable need to ensure a sound use of public funds (accountability) at all levels, are among the elements that make simplification a challenging process.

Furthermore, the EU legal framework sets a number of requirements that, although related to the CAP (CSPs need to ensure consistency with the legislation listed in Annex XIII to Regulation (EU) 2021/2115) [5] apply to all farmers throughout the EU, whether or not they receive financial support from the CAP. It is the case of statutory management requirements (SMR) that arise from relevant regulations and directives and, together with the good agricultural and environmental conditions (GAEC), define the boundaries of enhanced conditionality (formerly, cross-compliance). It is important to note that SMRs need to be fully implemented by Member States in order to become operational at the farm level and ensure equal treatment of farmers.

1 See more at: https://agriculture.ec.europa.eu/consultations-eu-initiatives-agriculture-and-rural-development/farmers-consultation-simplification_en.

2 European Commission: Directorate-General for Agriculture and Rural Development, *Consultation on modernising and simplifying the common agricultural policy (CAP)*, Brussels, 2017.

3 Ibid.

4 European Commission, *CAP cross-cutting objectives: Driving simplification*, 27/09/2019, https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27/key-policy-objectives-cap-2023-27_en.

5 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) N° 1305/2013 and (EU) N° 1307/2013, Official Journal of the European Union L 435, 6 December 2021, pp. 1-186.

While the 2023-2027 CAP 'new delivery model' (NDM) has the ambition of reducing EU-related administrative burden for beneficiaries (as against the previous periods, CAP regulations only provide strategic instructions and set basic requirements), greater responsibility to ensure adequate compliance is given to Member States that are nonetheless expected to simplify CAP implementation through an improved use of technology and other regulatory tools.

Indeed, several aid schemes – and the related rules and 'burdens' for farmers – are designed at national level (e.g. eco-schemes, coupled support and rural development interventions), with Member States being allowed flexibility and room for manoeuvre in the definition of regulatory specificities (as for GAECs) and implementation systems. Possible differentiation at regional scale is also foreseen.

Regulation (EU) 2021/2115 [6] on CSPs to be drawn up by Member States identifies the reduction of administrative burden as a key element of a streamlined and more effective governance of the CAP.

Several provisions target simplification. According to Article 6(3), "appropriate measures to reduce the administrative burden" must be taken by Member States when implementing the CAP.

The contribution of CSPs to simplification is also one of the elements to be specifically addressed by the "intervention strategies" (Article 109(2)i) and examined by the monitoring committee (Article 124(3)b).

Furthermore, the CAP Implementing Regulation (EU) 2022/1475 [7] establishes that in the evaluation of CSP efficiency, Member States should assess simplification both for beneficiaries and for the administration, with a special focus on administrative costs and on the use of digital tools and satellites (Article 1(3)).

CSP's ex ante evaluations had the task to assess the measures planned to reduce the administrative burden on farmers and other beneficiaries (Article 139(3) f) and according to the 'Synthesis of ex ante evaluations of CAP post 2020' [8] all 28 CSPs "support, at least fairly well" simplification.

The majority of Member States have targeted the reduction of administrative burden in each of the five aspects covered by the ex ante evaluation, such as the design of the policy and interventions, digital application systems, an integrated administration and control system (IACS), non-IACS interventions and other simplification solutions albeit to a different extent.

However, the available information may not be exhaustive due to a lack of relevant information in some cases and the early stage of CSP implementation (i.e. detailed rules and procedures for CSP interventions) at the time of the analysis. Of the 44 recommendations made by the ex ante evaluators in relation to simplification, 34% have actually led to updates of the CSPs.

Evaluators noted challenges in coordinating numerous environmental and climate-related interventions, recommending further simplification and better coordination. Further improvements are also needed to ensure digital systems are user-friendly, especially for small farms.

Simplification of CAP is an ongoing process. In May 2024, the European Parliament and the Council approved Regulation (EU) 2024/1468 [9] amending Regulations 2021/2115 and 2021/2116. As regards simplification measures and the reduction of burden for farmers, the amendments allow for a higher degree of flexibility and foresee certain exemptions in the application of targeted CAP requirements, notably:

- For GAEC 6 on soil cover, Member States can decide about sensitive periods and soils to protect according to national specificities.
- As an alternative to crop rotation (GAEC 7), Member States may give farmers the choice of applying crop diversification.
- Farmers are no longer obliged to have a minimum share of arable land to be devoted to landscape features and land fallow (GAEC 8) but could do so on a voluntary basis through an eco-scheme that all Member States have to include in their CSPs (including practices for the maintenance of non-productive areas, such as land lying fallow, and for the establishment of new landscape features on arable land).
- Small farms (under 10 hectares, i.e. 65% of CAP beneficiaries) are exempt from conditionality controls and penalties.
- Member States may exempt certain crops, soil types or farming systems from complying with requirements on tillage, soil cover, and crop rotation/diversification (respectively GAECs 5, 6, 7).
- Targeted exemptions allowing ploughing to restore permanent grassland in Natura 2000 sites if damaged by wild animals or invasive species could also be possible (GAEC 9).

More recently, the Strategic Dialogue on the Future of EU Agriculture [10] (4 September 2024) recommends that the European Commission and the Member States identify opportunities for simplification and the reduction of compliance costs, based on a comprehensive analysis of administrative, regulatory and reporting requirements faced by the agri-food sector. Specifically, the report highlights the need to improve the proportionality of regulatory measures, reduce and harmonise reporting requirements to ensure a uniform application of standards and rules across all Member States and streamline reporting requirements to minimise complexity. A final recommendation concerns the setting up of a unified digital portal for all EU and national regulatory and reporting requirements, and more widespread adoption of digital tools and platforms to simplify administrative tasks.

6 Regulation (EU) 2021/2115.

7 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. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R1475.

8 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3, *Synthesis of ex ante evaluations of CAP post 2020*, 2023, https://eu-cap-network.ec.europa.eu/publications/synthesis-ex-ante-evaluations-cap-post-2020_en.

9 Regulation (EU) 2024/1468 of the European Parliament and of the Council of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendment of the CAP Strategic Plans, review of the CAP Strategic Plans and exemptions from controls and penalties, Official Journal of the European Union L 2024/1468, 24 May 2024.

10 European Commission, *Strategic Dialogue on the Future of EU Agriculture. A shared prospect for farming and food in Europe*, 09/2024, https://agriculture.ec.europa.eu/overview-vision-agriculture-food/main-initiatives-strategic-dialogue-future-eu-agriculture_en.

Furthermore, the Implementing Regulation of 4 September 2024 [11] allows more flexibility to Member States in the use of geo-tagged photos for the purpose of the area monitoring system in the context of IACS.

Lastly, the Commission Staff Working Document (SWD) 'Simplification measures for farmers' [12] takes stock of progress in implementing the simplification package, including the suggestions collected during a wide-ranging consultation of Member States, farmer organisations and the European Parliament. This document also presents further actions taken in the areas of CSP management, green architecture, farmers' position in the supply chain, and other elements and policies outside the CAP.

2.2. Overview of relevant literature

The topic of administrative burden has been widely discussed in the literature, spanning various CAP measures and Member States. While the themes and impacts differ, the presence of these burdens generally has negative effects, leading to ongoing discussions on simplification measures. The following paragraphs present a review of selected relevant studies, either predominantly or partially focused on the subject of this study.

The study 'Analysis of administrative burden arising from the CAP', commissioned by DG AGRI [13], delved into the administrative burden and costs associated with the CAP, with a particular focus on IACS. The study found that, despite simplification efforts made over the years, administrative burden remained, particularly for Managing Authorities (MA) and Paying Agencies (PA). Administrative burden for farmers was deemed generally reasonable (2% to 3% of total aid received, without compliance costs), but it varied depending on multiple factors such as the size and complexity of holdings and the number of applications. Simplification measures, such as the use of ICT and GIS tools, have proven beneficial in reducing some of these burdens. However, new CAP interventions and the increased responsibility given to Member States could cancel these gains, leading to higher future administrative costs. Lastly, the study encouraged administrative burden reduction, stable regulations and a more tailored support to farmers.

Another study, conducted in 2019 in Germany, examined ways to simplify the administrative processes of the CAP [14], aiming to reduce the burden on the EU, Member States and farmers. The study found that administrative simplification of the CAP is urgently needed due to its excessive complexity. This complexity arises from its intricate structure, legal frameworks and strict financial controls. While simplification is possible, it must balance reducing administrative burden with maintaining accountability and ensuring effective use of public funds. The study also highlighted the need for better cooperation between the EU and Member States, increased use of digital tools and a shift towards a more trust-based administrative culture.

Relevant and interesting observations were found in the 2022 Annual Evaluation Report of the RDP Campania Region (IT) [15]. The document stressed the need for a continued focus on administrative simplification, enhanced collaboration and the integration of digital tools to improve efficiency. Systems and good practices such as the 'UMA' (a public register that manages the distribution of fuel for agricultural works) were praised for simplifying administration through automation and real-time updates of the national computer system, while the collaboration between advisory services and regional authorities was recommended for broader use to ease administrative burdens. Other recommendations aimed to support sustainable development in rural areas by fostering innovation, supporting young farmers, promoting economic diversification and ensuring robust infrastructure development.

Interesting reflections about simplification in the current programming period may also be found in the 2022 study "Governance: the reform process of the post-2020 CAP seen from an inter-institutional angle" [16]. This study analysed the transformation strategy from an inter-institutional perspective, examining how the European Parliament, Council and Commission engaged in the reform process. With the shift from compliance to a results-based system, reporting requirements and administrative complexity have increased, particularly for implementing bodies. The study noted that while beneficiaries have gained flexibility, administrations are facing higher costs due to complex control systems. Technology, such as digitalisation and remote sensing, is suggested for streamlining, though initial implementation costs are expected to be high. The recommendations focused on improving reporting, accelerating technology adoption and balancing simplification for beneficiaries with administrative efficiency.

11 Commission Implementing Regulation (EU) 2024/2202 of 4 September 2024 amending Implementing Regulation (EU) 2022/1173 laying down rules for the application of Regulation (EU) 2021/2116 of the European Parliament and of the Council with regard to the integrated administration and control system in the common agricultural policy.

12 European Commission, Staff Working Document *Simplification measures for farmers*, accompanying the document Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendments to CAP Strategic Plans, review of CAP Strategic Plans and exemptions from controls and penalties.

13 European Commission: Directorate-General for Agriculture and Rural Development and ECORYS, *Analysis of administrative burden arising from the CAP*, Publications Office of the European Union, Luxembourg, 2019, https://data.europa.eu/doi/10.2762/521652.

14 Members of the Scientific Advisory Board on Agricultural Policy, Food and Consumer Health Protection (WBAE) at the BMEL, *Administrative simplification of the EU Common Agricultural Policy – possibilities, approaches and constraints*, German Federal Ministry of Food and Agriculture, Berlin, 2019.

15 Independent Evaluation Service of the 2014-2020 RDP of the Campania Region under the EAFRD, written by Lattanzio KIBS, *2022 Annual Evaluation Report*, Rome, 2022.

16 Martinos, H., Matthews, A., Skouras, D., Pazos-Vidal, S., Röder, et al., *Research for AGRI Committee – Governance: the reform process of the CAP post 2020 seen from an inter-institutional angle*, European Parliament, Policy Department for Structural and Cohesion Policies, Brussels, 2022.

More recently, in 2023, an evaluation of Sweden's CSP for 2023-2027 [17] examined whether the simplifications aimed at reducing the administrative burden for applicants and support authorities have been effective. The evaluation found that simplifications in Sweden's CSP have had limited short-term impact on reducing the administrative burden, particularly for farmers' payments, which remain largely unchanged. Project and investment support have seen minimal improvements, with a need for clearer instructions and better system support. Key recommendations include enhancing the system support, simplifying processes, and improving cooperation between the board of agriculture and support authorities.

In the same year, an 'Evaluation support study of the costs and benefits of the implementation of LEADER' [18] was published. The primary aim of the study was to assess the added value of the LEADER approach in terms of local development and whether the additional costs associated with its implementation are justified by the benefits it provides. This evaluation asserted that the administrative burden in the LEADER programme presents significant challenges, with complexities arising in project selection, payment claims and control processes particularly affecting smaller applicants. Key findings emphasised the need for wider use of IT systems to streamline administrative procedures, as about 70% of surveyed Rural Development Programmes (RDP) had already implemented such solutions. The adoption of simplified cost options (SCO), used by fewer than 40% of RDPs, was suggested as a way to simplify funding processes.

One of the most recent EU level studies is the 'Study on Outcomes Achieved by EIP-AGRI Operational Group Projects under the CAP' [19]. The study aimed to analyse the outcomes achieved by Operational Group (OG) projects in the context of the EIP approach during the 2014-2020 (extended to 2021-2022) programming period to assess whether and to what extent this policy instrument has reached its objectives. Administrative burden was noted as a present and impeding element also in the context of EIP. The study found that OGs face significant administrative burdens, particularly with reporting obligations, long payment times, funding constraints and limited flexibility. It was suggested that, in order to ease this burden, the use of simplified cost options (SCO), such as lump sums and unit costs should be further promoted.

Regarding the issue of gold-plating, further explored below, we have considered two reference studies, both commissioned by the European Parliament and focused on this topic. Both studies remarked that gold-plating was present and had negative effects. Now, in the new programming period, with the greater autonomy given to Member States, the matter might have gained increased relevance.

The first study [20], published in 2014, focused on assessing how national rules in the implementation of the European Agricultural Fund for Rural Development (EAFRD) may add complexity unnecessarily, referred to as 'gold-plating'. The main finding of the study was that gold-plating increases complexity and the risk of errors. This overregulation creates administrative burdens which interferes with achieving policy goals. The study recommended addressing these issues through improved capacity building, better coordination, and cooperation between Managing Authorities, Paying Agencies and other stakeholders. Moreover, simplifying regulations and improving communication were seen as key to reducing errors and enhancing the efficiency of the EAFRD's implementation.

The second study [21] examined gold-plating and explored its reasons and effects, focusing on its presence across the European Structural and Investment Fund (ESIF) lifecycle and provided recommendations for reducing these burdens in both the previous and post-2020 programming periods. The study found that gold-plating increases administrative burden and costs for both Managing Authorities and beneficiaries. It occurs at various stages of the funding process, from accreditation to reporting and payment claims, and is driven by factors like regulatory inconsistencies, fear of audits and system complexity. Finally, the study recommended reducing gold-plating by simplifying rules, improving communication, encouraging the use of electronic systems and balancing compliance with performance to ease the administrative load on both authorities and beneficiaries.

17 Fägerlind, C., Malmberg, A., Henriksson, J., Steijer, K., Berg, M., et al., *Administrative burden and the Swedish Board of Agriculture's guidance to support authorities, Process evaluation of Sweden's CAP Strategic Plan 2023-2027*, Swedish Board of Agriculture, 2023.

18 European Commission: Directorate-General for Agriculture and Rural Development, EEIG Agrosynergie, Ecorys and Metis, *Evaluation support study of the costs and benefits of the implementation of LEADER,* Publications Office of the European Union, Luxembourg, 2023, https://data.europa.eu/doi/10.2762/995751.

19 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2024): *Study on outcomes achieved by EIPAGRI Operational Group projects under the CAP*, https://eu-cap-network.ec.europa.eu/publications/study-outcomes-achieved-eip-agri-operational-group-projects-under-cap_en.

20 European Parliament: Directorate-General for Internal Policies – Policy department D, Ecorys et al., *'Gold-plating' in the EAFRD. To what extent do national rules unnecessarily add to complexity and, as a result, increase the risk of errors?*, Brussels, 2014, https://www.europarl.europa.eu/thinktank/en/document/IPOL-JOIN_ET(2014)490684.

21 European Parliament: Directorate-General for Internal Policies – Policy department B,Spatial Foresight, *Research for REGI Committee, Gold-plating in the European Structural and Investment Funds*, 2017, https://www.europarl.europa.eu/thinktank/en/document/IPOL_STU(2017)585906.

3. Methodology

This chapter describes the study's methodological approach. First, the key terms and concepts are discussed. Subsequently, the three study questions are briefly presented and an overview of data collection methods and tools is provided. The last section of the chapter examines the limitations of the methodology and data.

3.1. Key terms

Administrative burden

The study refers to the definition of administrative burden provided in the 'Better Regulation Toolbox' [22]. **Administrative burden corresponds to the cost of collecting and processing information which is done solely because of a legal obligation** [23]. As far as this study is concerned, administrative burden mainly arises from obligations related to CAP aid legislation.

To fulfil obligations, CAP beneficiaries must perform administrative tasks (e.g. providing information, recording data, collecting evidence) which would not be due in the absence of CAP support, except of course compliance with SMRs and with the other requirements previously mentioned (i.e. as in Annex XIII of the CSP regulation) which apply also in the absence of CAP support.

Consistently with the definition, administrative burden does not include activities and costs that beneficiaries would carry out in the absence of CAP support (so-called 'business as usual') [24]. Regarding the distinction between 'administrative burden' and 'administrative costs' and how this study approaches it, see the pertinent 'limitations' in Section 3.4 below. Further clarifications are provided throughout the analysis.

Simplification

The CAP has undergone various modifications over consecutive programming periods, where simplification has been an essential part of aiming to tailor and improve implementation. Simplification is also a component of assessing efficiency.

The EU CAP Network's guidelines 'Use of factors of success in evaluation' [25] defines simplification 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**. This definition clearly mirrors the definition of administrative burden illustrated above. Simplification also implies that additional administrative costs without added value for the achievement of CAP objectives are not incurred.

Gold-plating

Gold-plating is a highly complex and sensitive issue. It has been addressed in different policy contexts and there are different understandings of the concept and its application. Many of these relate to the transposition of EU legislation into national legislation, such as in the context of the Single Market [26].

According to the Better Regulation Guidelines [27], 'gold-plating' refers to "Member States imposing obligations that go beyond what is envisaged in the legislation" and, in the context of administrative burden, it may entail "increasing the reporting frequency, adding data requirements or expanding the target group" [28].

Consistent with this definition, in the context of Smart Regulation in the EU [29], gold-plating refers to the "transposition of EU legislation, which goes beyond what is required by that legislation, while staying within legality". Member States have large discretion when implementing Commission directives. They may increase reporting obligations, add procedural requirements or apply more rigorous penalty regimes. Even if within the law, gold-plating is usually presented as a bad practice because it imposes costs that could have been avoided [30].

The above-mentioned 2014 study on 'Gold-plating in the EAFRD' [31] considered gold-plating, in operational terms, as an excess of norms, guidelines and procedures accumulated at national, regional and local levels, which interfere with the expected policy goals to be achieved by such regulation.

According to the study on gold-plating in the ESIF [32], the practice of imposing additional obligations is often referred to as 'active gold-plating'. Gold-plating may also be the failure of national, regional or local bodies to apply simplification measures such as simplified cost options. This is usually referred to as 'passive gold-plating'. Both these types of gold-plating are seen as complicating EU legislation unnecessarily, leading to increasing administrative burden and costs.

22 European Commission, Better Regulation Toolbox, 2023.
23 Ibid., p. 523.
24 Although not counted as administrative burden arising from the CAP, voluntary activities (e.g. recording of information) carried out by farmers for their own purposes have been treated during farmer interviews.
25 European Commission – Directorate – General for Agricultural and Rural Development – Unit A.3 (2023), *Use of Factors of Success in Evaluation*, Brussels, 2023, Use of factors of success in evaluation | EU CAP Network (europa.eu).
26 Mickute, K., *How to identify and avoid gold-plating EU regulations*, European Policy Information Centre, https://www.epicenternetwork.eu/briefings/how-to-identify-and-avoid-gold-plating-eu-regulations-3167/.
27 European Commission, Better Regulation Guidelines, SWD(2021) 305 final, 3/11/2021.
28 European Commission, Better Regulation Toolbox, 2023, p.528-529.
29 European Commission, *Smart Regulation in the European Union*, COM (2010) 543 final, 8/10/2010, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52010DC0543.
30 European Parliament: DG for Internal Policies, *Gold-plating' in the EAFRD. To what extent do national, rules unnecessarily add to complexity and, as a result, increase the risk of errors?* 2014, https://www.europarl.europa.eu/thinktank/en/document/IPOL-JOIN_ET(2014)490684.
31 Ibid.
32 European Parliament: DG for Internal Policies, Research for REGI Committee, *Gold-plating in the European Structural and Investment Funds*, 2017, https://op.europa.eu/en/publication-detail/-/publication/1a088de2-3422-11e7-9412-01aa75ed71a1/language-en.

Gold-plating in the 2023-2027 CAP – A working definition

Defining gold-plating in the context of the 2023-2027 CAP needs to take into account the special characteristics that flow from the implementation of the new delivery model, which entails a high degree of subsidiarity with substantial areas of discretion for Member States. CAP Regulations provide only strategic instructions and set basic requirements. Member States are given greater responsibility to ensure adequate compliance and are also expected to simplify CAP implementation through an improved use of technology and other regulatory tools.

Indeed, as highlighted in Chapter 2, the rules of several aid schemes and the related 'burdens' for farmers and other beneficiaries are designed at national level (e.g. eco-schemes, coupled support and rural development interventions) with Member States being allowed flexibility and room for manoeuvre in the definition of regulatory specificities (as for GAECs) and implementation systems, including also possible differentiation at regional scale. Nevertheless, the EU legal framework sets a number of requirements support from the CAP. This is the case of SMRs that arise from relevant regulations and directives and, together with GAECs, define enhanced conditionality.

The 2023-2027 CAP has brought new opportunities and challenges for Member States. EU countries have made their choices on how to design and implement CSPs and defined the conditions of CAP support taking into account national and local issues. For instance, through nationally designed eco-schemes, Member States have targeted context-specific features and needs to contribute to the EU's environmental and climate objectives. In rural development, Managing Authorities have designed their own interventions based on the general framework outlined at EU level. Conversely, the 2023-2027 programming period has given Member States greater responsibility in setting up effective management, control and sanctioning systems, with key definitions, rules and procedures to be defined at national level.

Therefore, in the context of this study, not all burden stemming from the implementation choices of Member States can be treated as 'unnecessary' burden and equated with 'gold-plating'. An appropriate **working definition** for gold-plating is derived by narrowing down the basic definition of the Better Regulation Guidelines and defining **gold-plating** as **"Member State imposed obligations that go beyond what is envisaged in the legislation and are not strictly necessary for the achievement of the objectives of the CAP"**.

The textbox below summarises the main sources of gold-plating of relevance to this study.

Box 1. Main sources of gold-plating

The main sources of gold-plating can be summarised as follows:

- National implementation of EU directives: national authorities may interpret EU regulations more restrictively or add extra layers of complexity, requiring more documentation or checks than the EU intended.
- National or regional legislation alignment: countries often introduce additional requirements to align EU CAP regulations with their national legal frameworks, making the process more cumbersome.
- Rigid procurement rules: the extension of procurement rules to private entities and the enforcement of rigid rules, like the requirement for three quotes for small investments, contribute to overregulation.
- Eligibility requirements: MAs in different Member States/regions implement interventions by introducing stricter eligibility requirements than those necessary to achieve the objectives of CAP and fulfil the general principles set out in EU regulations.
- Environmental and agri-environmental commitments: under the CAP's 'green architecture', countries are given flexibility to design eco-schemes and rural development interventions addressing context-related issues. In some cases, commitments may be excessive, inadequately compensated or unrelated to the environmental objectives pursued, thus making participation in these schemes more burdensome than necessary.
- Multi-year commitments: long-term requirements, such as maintaining the exact size of land receiving support, create complexity and increase the risk of errors over time.
- Administrative procedures: overly strict administrative procedures, often originating at national level, can impose excessive burdens on both beneficiaries and programme administrators.
  - **Overly complex application processes**: national systems might, in some cases, make the application process for CAP funding unnecessarily difficult, requiring excessive forms, certificates or third-party involvement.
  - **Additional and overly detailed reporting obligations**: authorities may demand more detailed information from farmers than is required under the CAP. This might include excessive paperwork, frequent progress reports or redundant data submission.
  - **Duplicative reporting systems**: some Member States may not streamline CAP-related reporting with their national systems, causing duplication of effort and extra administrative burdens.
  - **Complex control mechanisms and long payment times**: increased complexity in the processes of payments and controls also serves as a source of gold-plating, as it demands more from beneficiaries than necessary. While the EU sets minimum requirements for checks and audits, some Member States adopt more rigorous national inspection and control regimes, which often go beyond what is necessary. This results in higher compliance costs for farmers who perceive the whole process as too long and full of uncertainty.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025) based on two studies by the European Parliament (2014; 2017) referred to above.

3.2. Research questions

The analysis aimed at fulfilling the study objectives addresses three research questions (RQ) as described below.

RQ1: What CAP requirements and related legislation are the most burdensome for beneficiaries and why? What is suggested by beneficiaries as the most effective simplification actions?

This research question seeks to identify and explore the main causes of burden for farmers and other beneficiaries under the 2023-2027 CAP, examining the possible options for simplification. CAP funding represents an important source of income and an incentive to pursue growth and sustainability for farmers and other public and private stakeholders in rural areas. The complexity of requirements and procedures related to CAP instruments may reduce the benefits of funding, causing concerns and uncertainty among beneficiaries.

RQ2: What is the administrative burden arising from the 2023-2027 CAP for farmers and other CAP beneficiaries?

This question aims to provide both a qualitative and quantitative assessment of the administrative burden for farmers and other CAP beneficiaries to the extent possible, building on the data collected both in the first and second phases of the study, including information collected through the TC (see Section 3.3.1).

RQ3: What is the administrative burden stemming from EU level CAP legislation as compared to the burden generated from different Member States' implementation choices and possible gold-plating?

The third research question aims to attribute the administrative burden for farmers and other CAP beneficiaries to its main sources, i.e. whether the burden stems primarily from CAP and other EU level legislation or emanates from Member States' implementation choices and practices.

For answering RQ3, the analysis was developed according to three subordinate questions aimed at covering the different aspects to be examined, and specifically:

RQ3.1: What are the areas of CAP where gold-plating could occur/ occurs and through which mechanisms?

RQ3.2: For the most important areas, how do approaches differ across Member States and what are their implications in terms of burden for beneficiaries? What actions have Member States taken to ease administrative burden for beneficiaries?

RQ.3.3: What other solutions/alternatives could be considered to reduce the administrative burden for beneficiaries?

3.3. Overview of data collection methods and tools

This section presents the primary and secondary data collected for the study and the tools used.

As described in Chapter 1, the study aims to assess the administrative burden on farmers and other CAP beneficiaries and draw conclusions for further simplification. Besides farmers, who represent the main focus of the study, the following five categories of CAP beneficiaries were subject of the analysis: LAGs operating under LEADER, Operational Groups of the EIP-AGRI, Producer Organisations in the fruit and vegetable sector, wine growers/producers in the relevant Member States and advisory services.

The study addressed advisory services in their twofold nature of CAP beneficiaries (e.g. KNOW interventions) [33] and service providers in relation to CAP aid applications and farm management, therefore taking the opportunity to complement and triangulate information gathered from farmers.

Furthermore, to complete the picture of administrative burden for beneficiaries, explore the sources of administrative burden and discuss concrete options for simplification, the study addressed CAP authorities and other key informants at national level, farmer organisations and other beneficiary associations (i.e. LEADER, EIP-AGRI) at EU level.

Finally, the answers to the research questions also incorporate information collected from the Commission TC on simplification and about 300 in-depth interviews with farmers across the EU (i.e. interviewees were selected among the TC participants).

The following sections briefly describe the data collected through the various tools.

33 Interventions related to 'knowledge exchange and dissemination of information', provided for by Article 78 of Regulation (EU) 2021/2115.

3.3.1. European Commission targeted consultation on simplification and follow-up interviews with farmers

3.3.1.1. Targeted consultation on simplification

The Commission **TC on simplification** [34] was open from 7 March to 8 April 2024 and about 27 000 farmers responded. Analysis of TC data includes the elaborations provided by the Commission as well as data from open-ended questions, analysed using artificial intelligence (AI) [35]. The utilised AI tool enabled the team to analyse responses, with open-ended answers translated and categorised to facilitate interpretation. Filters were applied to distinguish respondents based on specific characteristics, including:

- **type of farming** (16 categories; non-unique responses due to multiple options)
- **farm size** (seven unique categories)
- **age** (five unique categories)
- **participation in the EU organic scheme** (yes/no)
- **CAP support category** [36]
- **EU Member State**
- **sentiment, tone and emotion categorisations** (applied to Q10 and Q20) [37][38].

3.3.1.2. Farmers' interviews

In-depth interviews with farmers were based on a 23 question questionnaire structured into three parts covering administrative burden, compliance with requirements and ideas for simplification. The questionnaire was designed to mirror the topics addressed by the TC and delve deeper into them.

Farmers were selected among the participants in the TC who had given consent to be contacted for a follow-up interview. Based on this, the sampling of farmers for the interviews was based on two main criteria:

1. Their respective agricultural activity.
2. Their respective holding size.

The selection, based on three types of farming (crop, livestock, mixed) and four types of sizes (below five hectares (ha), from 5-50 ha, from 50-100 ha and above 100 ha), aimed to reflect the diversity of activities and farm sizes across the EU while factoring in their true distribution (based on Eurostat data) [39].

A set of secondary criteria, including level of training, gender, use of external help, recent inspections undergone and number of workers on the farm, was used to balance and further ensure the variety of the sample.

The following table provides a breakdown of the interview sample by Member State.

Table 1. Farmers' interviews by Member State

Member State	N°. of Interviews	Member State	N°. of Interviews
BE	13	LT	10
BG	10	LU	4
CZ	10	HU	11
DK	10	MT	2
DE	18	NL	12
EE	8	AT	11
IE	11	PL	15
EL	10	PT	16
ES	18	RO	10
FR	18	SI	8
HR	11	SK	10
IT	18	FI	10
CY	4	SE	10
LV	10	TOTAL	298

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

34 See more at: https://agriculture.ec.europa.eu/consultations-eu-initiatives-agriculture-and-rural-development/farmers-consultation-simplification_en.
35 Analysed TC questions are: Q01, Q09, Q10, Q13, Q17 and Q20.
36 Not comprehensively or uniformly categorised, except for Q01.
37 Q10 open-ended question: "Could you please specify the nature of the difficulties you have when applying the requirements set under the good agricultural and environmental condition (GAECs) or other environmental and sanitary requirements?".
38 Q20 open-ended question: "Do you have any suggestions for simplifying the burden imposed by procedures and rules linked to financial support under the common agricultural policy (CAP), or other EU rules for food and agriculture?".
39 Eurostat farm structure data: https://ec.europa.eu/eurostat/databrowser/product/page/ef_m_farmleg.

3.3.2. Documentary research

The analysis used information collected through extensive **documentary research,** which represents an important tool for this study. Documentary research was used to gather and analyse information across all three research questions. Various types of documents were examined, which can be classified under the following two broad categories:

- Policy and programme documents, starting with the EU relevant regulations and including the 28 CSPs, policy briefs, position papers and simplification proposals of the Member States; position papers of EU-level organisations (agriculture, forestry and rural areas); and reports of public consultations, workshops and other initiatives conducted (mostly) at the EU institutional level.
- Scientific literature about the administrative burden and gold-plating comprising research studies, ex ante evaluations of CSPs, thematic evaluations, case studies, workshop materials and other relevant documents (see previous section 2.2 for an overview). This includes the EU CAP Network's Good Practice Workshop 'Assessing simplification of the CAP for beneficiaries and administration' on 7-8 November 2024 [40].

3.3.3. Scoping interviews at EU level

Six scoping interviews were conducted with EU level farmers' organisations to complement and better understand information gathered from farmers. These were arranged with the following farmer organisations: COPA-COGECA (two interviews), IFOAM, Via Campesina, CEJA and ELO.

Two more interviews with other beneficiary associations/networks (e.g. LEADER, EIP-AGRI) at EU level were arranged with ELARD and the EU CAP Network – Contact Point and served the purpose of collecting informed opinions and comprehensive views at EU level on CAP beneficiaries other than farmers.

Interviews helped differentiate sources and causes of administrative burden and complexity related to compliance with requirements between: a) interventions under EAGF and EAFRD; b) farm sizes, farming types, age of farm holder, etc.; and c) different CAP support schemes. These interviews also aimed to collect relevant information about possible causes of gold-plating and examples of good practice and successful simplification across the Member States.

3.3.4. Questionnaire-based surveys

In order to expand the analysis of administrative burden for CAP beneficiaries other than farmers, dedicated surveys were directed to Local Action Groups (LAG), to Producers Organisations in the fruit and vegetables sectors, to wine growers/producers, to EIP Operational Groups selected under the 2023-2027 programming period and to advisory services. With respect to wine growers and producers, contacts of wine farmers that participated in the TC and expressed interest in being contacted for further questions were used. For those, more general questions related to the administrative burden of CAP overall (i.e. not linked to specific interventions) were not repeated to avoid respondents' fatigue. In addition to this set of wine farmers, wine national associations were reached out to further disseminate the survey among their members. In this case, broader questions about the overall administrative burden were included in the questionnaire.

Contacts were identified for each group of CAP beneficiaries under the 2023-2027 programming period based on either EU databases (e.g. LAGs, EIP OGs, POs of fruit and vegetables) or national databases (e.g. advisory services, wine growers and producers). All five surveys were conducted through an online questionnaire (EU Survey) in November-December 2024. All questionnaires were translated into the national languages with the support of machine translation available on EU Survey.

The surveys to wine growers/producers and LAGs have recorded good response rates, whereas the other three surveys recorded lower participation rates. The EIP OG survey suffered from a more limited contact database compared to the others, due to the fact that only few Member States had launched this intervention under their CSP at the time of data collection.

The following table summarises the results of survey data collection.

40 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2025): *Assessing simplification of the CAP for beneficiaries and administrations*, Report of the Good Practice Workshop 7-8 November 2024, Budapest, Hungary, 2025, https://eu-cap-network.ec.europa.eu/publications/assessing-simplification-cap-beneficiaries-and-administrations_en.

Table 2. Overview of CAP beneficiaries' surveys

Target CAP beneficiaries	N°. of contacts invited	No. of responses submitted	Response rate (%)
Wine growers/producers	906	206	22.7
Producers Organisations	1 374	68	4.9
Local Action Groups	3 151	404	12.8
Advisory services	5 024	215	4.3
EIP Operational Groups	641	37	5.8

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

3.3.5. In-depth interviews at national level

In-depth interviews were conducted in all Member States, directed to:

- CSP Managing Authorities across EU-27 (i.e. 28 CSPs) and, in addition, with Paying Agencies where relevant.
- Key stakeholders/experts of CAP implementation: e.g. farmer organisations at national level, advisory services, chambers of agriculture, evaluators and other experts.

Interviews did not necessarily target each type of stakeholder in all Member States. Priority was given to the most relevant actors in each context (e.g. chambers of agriculture were contacted in countries where they are directly involved in the process of providing services to farmers and other beneficiaries applying for CAP support; relevant experts were interviewed based on available contacts and specific expertise linked to the study topics).

A total of 144 interviews have been carried out during November 2024, covering all 27 Member States (28 CSPs). A total of 161 stakeholders have been interviewed. All stakeholder groups are well represented in the conducted interviews, with a larger number of interviews with MAs and PAs/coordination bodies.

3.4. Limitations of the study

This section aims to point out the main limitations of the study.

1) CAP beneficiaries' knowledge and awareness of sources of administrative burden

As mentioned above, the study draws on primary sources of information, such as farmers responding to the TC and follow-up interviews and other beneficiaries participating in surveys. The analysis is therefore based on their experience of CAP and perception of complexity.

In general, farmers and other CAP beneficiaries do not all have full knowledge about specific CAP interventions, aid schemes, rules and requirements they may be subject to and, more broadly, about the contents of EU regulations. Farmers were able to provide detailed answers in relation to the topics they had direct experience of (i.e. burden generated by tasks they perform or are subject to in person, such as controls). Their level of knowledge was generally limited or even very limited in relation to tasks delegated to advisory services (e.g. aid applications).

In the case of interviews, wherever possible, the interviewer clarified and contextualised understanding and information and then cross-checked it against the relevant legal basis or implementation system. In more general terms, the approach proposed in this study involves **triangulation** using additional data sources (i.e. interviews with advisory services, MAs and other CAP stakeholders) to validate the information gathered from farmers and other CAP beneficiaries and distinguish the sources of complexity.

In particular, advisory services, which were involved through a survey at EU level and interviews at Member State level, provided information regarding their support to farmers for CAP support applications and compliance with requirements and contributed to clarifying, complementing and validating the issues raised by farmers.

MAs and other authorities that participated in interviews at national level had the opportunity to share their perspective on administrative burden for beneficiaries (which contributed to a clearer picture of the data collected from beneficiaries) as well as describe how they support beneficiaries during the administrative process linked to CAP funding and compliance with requirements (e.g. providing communication, training, capacity building, etc.).

2) Limitations of data about costs associated with administrative burden

Limited data on costs are available from the literature and, where available, data on time spent on administrative tasks and related costs are heterogeneous. As a solution, the approach proposed in the present study aimed to develop different cost estimates to present ranges, rather than point estimates. In addition, information from the previous study [41] helped to contextualise and triangulate the analysis of costs for farmers.

Surveys at national level across the EU helped to gather the cost evidence needed for the analysis. A mixed quantitative and qualitative approach was used to provide information on the burden for other CAP beneficiaries besides farmers and aspects for which monetisation is not possible.

3) Participation of CAP beneficiaries and advisory services in surveys

While contacts for CAP beneficiaries such as LAGs and EIP OGs were sourced at EU level (Commission and EU CAP Network), for POs in the fruit and vegetable sector, wine growers and advisory services databases at EU level were not available. For these categories, the MAs were asked to provide contacts, or these were obtained through the support of country experts. However, in some cases, the late and incomplete availability of contacts resulted in a lower participation in the survey for these categories and an uneven distribution of respondents among Member States (see Annex I), which represents a limitation for the analysis of these data.

4) Differentiation between administrative costs and burden

A limitation of this study concerns the challenge of clearly distinguishing between administrative costs and administrative burden, as defined under the Commission's Better Regulation Toolbox (Tool #58) [42]. According to this definition, administrative burden specifically refers to costs arising from information obligations that go beyond 'business as usual', whereas administrative costs encompass all costs related to fulfilling information obligations, including routine business practices. In practice, however, this differentiation is difficult to apply in the context of CAP-related administrative tasks, as farmers often do not perceive a clear boundary between obligations linked to CAP support and those stemming from other regulatory requirements or their regular business operations.

In this study, we focused on estimating the time spent by farmers on administrative activities directly associated with CAP support, structured according to the different phases of the process (application, follow-up and controls) and subsequently monetised these time estimates. While a theoretical distinction could be made by attributing tasks such as information-gathering, application preparation, controls to administrative burden, and recording and reporting to administrative costs (since some reporting obligations are linked to other legislation, such as compliance with the EU Nitrates Directive under SMRs) it was not possible to operationalise this separation in the calculations. This is due to the high degree of overlap between obligations and the difficulty respondents face in isolating the time spent on activities that serve multiple regulatory purposes. As a result, the estimates presented reflect the total time spent on administrative activities linked to CAP support without adjusting for what might be considered 'business as usual' under Better Regulation Guidelines.

41 European Commission: Directorate-General for Agriculture and Rural Development, *Analysis of administrative burden arising from the CAP*, Publications Office of the European Union, 2019, https://data.europa.eu/doi/10.2762/521652.

42 See more at: https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox/better-regulation-toolbox_en.

4. Presentation of findings by research question

4.1. RQ1. What CAP requirements and related legislation are the most burdensome for beneficiaries and why? What is suggested by beneficiaries as the most effective simplification actions?

4.1.1. Description of RQ1

This question seeks to understand the main causes of complexity for farmers and other CAP beneficiaries. Based on qualitative information collected from multiple sources, the question explores several areas of legislation within and outside CAP, including:

- administrative procedures linked to CAP funding schemes;
- other administrative tasks imposed by authorities at all levels;
- conditions that beneficiaries must comply with to access certain CAP funding (e.g. GAECs); and
- conditions that beneficiaries must comply with irrespective of receiving CAP support (e.g. SMRs).

The aim is to provide an overview of the 'most burdensome requirements', intended as both onerous information obligations and related administrative tasks (i.e. administrative burden, as defined in Section 3.1) and requirements that entail compliance challenges, such as adjustments to the holding structure, additional investments, difficult farming operations or other issues of non-administrative nature.

Reference to relevant regulatory frameworks or specific pieces of legislation, where possible, is made throughout the analysis. This provides preliminary indications of the sources of burden, in particular CAP legislation, as outlined by EU regulations or implemented through national CSPs and other legislation at EU or national level. However, an assessment of the share of the burden arising from different sources is covered under RQ3.

RQ1 discusses the main areas of burden and their causes qualitatively (quantification of administrative burden being addressed by RQ2), assuming the perspective of farmers and other CAP beneficiaries, complemented by the opinions of CSP authorities and stakeholders at Member State level. This question also presents possible approaches to policy simplification and concrete simplification actions suggested by farmers and other CAP beneficiaries in relation to the main causes of burden.

4.1.2. Analytical approach

The analysis is structured in four parts, drawing on the results of the TC (see Section 3.3.1) and using other sources of information [43], to triangulate and complement TC's findings in relation to:

1. The main activities carried out by farmers along the main procedural steps (preparation to apply, CAP application and follow-up, recording and reporting, controls and on-site inspections).
2. Challenges related to compliance with conditionality and other environmental and sanitary requirements (related to or irrespective of CAP funding).
3. A focus on the main areas of burden of CAP (requirements and interventions).
4. Beneficiaries' suggestions to simplify the CAP.

The first part of the analysis aims to identify the **main causes of burden** for 2023-2027 CAP beneficiaries and the related suggestions for policy simplification. Predominantly based on information collected from farmers and other CAP beneficiaries, the analysis assumes their perspective, seeking to complement and validate findings through data gathered from institutional stakeholders and documentary research.

To ensure consistency and comparability throughout the analysis of different areas of the CAP, the analysis explores the administrative tasks linked to accessing CAP support, based on a standardised lifecycle [44] of CAP operations [45] articulated into four main procedural steps:

a) Preparatory activities and decision-making.

b) Application and related follow-up.

c) Recording and reporting.

d) Controls, including on-site inspections.

43 Local Action Groups, beneficiaries of a dedicated cooperation intervention and responsible for the preparation and implementation of LEADER; OGs of the European Innovation Partnership for agricultural productivity and sustainability (EIP-AGRI); POs of the fruit and vegetable sector; wine growers and producers, particularly, even if not exclusively, as beneficiaries of sectoral intervention. Finally, CSP Managing Authorities and other stakeholders provide their views on the main causes of burden.

44 Although different rules, obligations and timelines apply to CAP aid schemes, this model is based on the assumption that all CAP beneficiaries: i) gather information about rules and schemes they wish to apply for; ii) submit an application form and may be requested to amend it or provide additional information to the authorities; iii) may be requested to record and report data and/or expenditure during the implementation of their operations; iv) may undergo administrative and/or on-site controls before receiving payment. It should be noted, however, that beneficiaries fulfil recording/reporting obligations and undergo controls also in the context of non-CAP EU and national legislation. Data might be also recorded for own purpose.

45 An 'operation' is defined as 'a project, contract, action or group of projects or actions selected under the CAP Strategic Plan concerned' by Article 3, paragraph 4, letter a) of Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021.

This approach emphasises common elements and, to the extent possible, draws cross-cutting conclusions. While identifying the main causes of burden, the analysis by procedural step also seeks to emphasise, where relevant and possible:

- The nature of burden, distinguishing administrative burden from challenges related to compliance with requirements and other tasks not included in the definition of administrative burden (e.g. 'business as usual').
- Reference to the relevant types of interventions that are most affected by certain causes of burden.
- Reference to the relevant sources of legislation (EU or national, CAP-related or outside the CAP).

The second part of the analysis focuses on conditionality and other environmental requirements, comparing the main findings from the TC with those arising from other relevant sources. Again, the analysis identifies the main causes of burden related to requirements [46].

After exploring the main causes of burden from the perspective of procedural steps, the analysis also attempts to isolate and classify the perceived complexity of CAP interventions and requirements. This exercise is carried out using information collected from the TC and complemented by the responses of MAs, PAs and Member State stakeholders, whose comprehensive perspective on CAP outlines the main CAP's **areas of burden** [47]. This classification plays a twofold role:

- first, it triangulates and confirms the findings of the analysis by procedural steps; and
- second, it provides the basis for the analysis of the legislative sources of burden, gold-plating and simplification actions in RQ3 (see RQ3's analytical approach, Section 4.3.2).

Finally, the analysis presents the suggestions made by farmers (both those responding to the TC and those interviewed) and other beneficiaries to simplify the CAP. The suggestions collected reflect the perception and experience of beneficiaries. To the extent possible, the analysis aggregates the many suggestions into categories in order to consistently address the main causes of burden for beneficiaries.

4.1.3. Analysis of findings

4.1.3.1. Administrative burden focusing on the main procedural steps

This section examines the main procedural steps of the lifecycle of CAP operations, aiming to identify the main causes of burden. The analysis also points to the relevant legislative sources of burden, where clearly identified, and the CAP interventions mostly affected by each cause of burden.

In addition to the analysis by procedural step, this section looks at two related aspects: information concerning farmers who decided not to apply for CAP and the use of external help linked to CAP support.

Preparation

Box 2. Preparation: key findings

Summary of findings:

Preparatory activities aimed at collecting information on CAP aid and making the decision to apply for it are crucial tasks, especially when there is a new programming period.

Causes of burden during the preparation phase include unclear rules and procedures, frequently changing rules and the existence of multiple layers of legislation. Poor communication and support from authorities exacerbate challenges for farmers and other beneficiaries (e.g. EIP Operational Groups).

An additional cause of burden for LAGs is the limited availability of official data when preparing their local development strategies.

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

The first activity beneficiaries perform to receive CAP support is gathering information and deciding which CAP schemes to apply for. Interviews with farmers explored preparatory tasks in depth and identified the following main causes of burden:

- unclear rules and procedures
- frequently changing rules
- multiple layers of legislation

Around 20% of the farmers interviewed for this study mentioned preparation among the 'most burdensome tasks' related to the process of applying for CAP [48]. These farmers emphasised that much effort was devoted to understanding the innovations of the 2023-2027 programming period [49]. They also specified that keeping abreast of legislation, which is perceived as frequently changing, is 'an ongoing task' and 'takes time all year round'.

Other sources of information, notably interviews with EU organisations, surveys of other CAP beneficiaries and interviews with MAs, PAs and Member State stakeholders, confirmed these findings: preparation was rated as the most burdensome task by wine growers and producers ('very burdensome' for half of respondents) [50]. Other beneficiaries, including advisory services, considered it burdensome even if less than the application step [51]. For LAGs, a clear challenge in the preparation phase is represented by the limited availability of official data for the preparation of LDS (see Box 4).

46 In this sense, the study considers 'meeting requirements' as a further procedural step of predominantly non-administrative nature.
47 During the interviews, MAs, PAs and other Member State stakeholders were asked to select up to five 'areas of burden' (including CAP interventions or requirements) and justify their choice.
48 Source: interviews with farmers.
49 To obtain information they have used available channels such as seminars or training events (organised by chambers of agriculture, farmer associations and public authorities), official MA/PA websites, information leaflets and handbooks provided by farmers associations, meetings with or enquiries (e.g. telephone calls) to authorities, information from advisory services and farmer associations, newspapers (source: interviews with farmers).
50 Source: survey of wine growers and producers. This judgement was related to CAP in general (not only sectoral interventions) and was asked of respondents not having participated in the TC.
51 Source: surveys of LAGs, POs, EIP OGs and advisory services.

Unclear rules and procedures. This is an important obstacle for beneficiaries trying to navigate the CAP system. For instance, farmers have worked hard to go through the new regulations, understand aid schemes and related requirements and make the right decisions (e.g. whether to apply for CAP and for which aid schemes).

Despite these efforts, around 10% of the interviewed farmers exposed their concerns about the **lack of clarity of regulatory frameworks at all levels**: EU regulations, national legislation and implementation documents (i.e. administrative acts such as calls and procedural documents). The reasons behind this perception of lack of clarity can be found in a combination, of the following aspects: the technicality/ambiguity of terms, the lack of a coherent source of information and the novelty of some parts of the legislation (e.g. eco-schemes) [52].

Poor communication and guidance from authorities further exacerbate a lack of clarity. This is a common finding throughout all data sources and may be due, on one hand, to the lack of capacity or relevant authorities to offer assistance for clarifications and on the other hand, to delays in approving legislative frameworks or providing guidelines to beneficiaries.

In the specific case of EIP OGs, the perceived lack of support from authorities should be carefully considered: a recent study on the outcomes of OG projects in the 2014-2022 [53] programming period highlighted that the support provided by MAs and innovation support services to the OGs during the preparation and application stages is crucial in influencing the achievement of good project results.

Table 3. Unclear rules and procedures: examples from data collection

Unclear rules and procedures – examples	Member State	Source
Difficulties to find or understand information due to technical terminology, ambiguous definitions, and many different sources.	AT, DE, LV, FI	Interviews with farmers
Unclear rules about payment times and amounts to be paid.	BE-WA, BG, FR, IT	Interviews with farmers
Limited capacity of authorities to provide information/assistance to clarify rules and procedures. This leads to poor or late information from authorities, allowing no time for adequate preparation.	BE-WA, DE, EL, FR, NL, SK	Interviews with farmers Interviews with MAs/ PAs and stakeholders
Insufficient support (e.g. training, clear guidelines, timely instructions) provided to EIP OGs to go through legislation and set up the group and project.	BE-FL, DE, IT, NL	Survey of EIP OGs
Late approval of regulatory frameworks – from EU regulations to CSPs, national specifications and calls.	BE-WA, CZ, DK, IT, PT AT, BE-WA, DE, LV, LU, PL	Interviews with MAs/ PAs and stakeholders Survey of LAGs
Difficulties to understand the structure of the 'green architecture', e.g. lack of clarity on the interaction and overlapping of mandatory requirements (conditionality) and voluntary schemes (eco-schemes, rural development interventions) [54] or the shift from 2014-2022 'greening' to voluntary eco-schemes. Specifically for eco-schemes, the novelty of these schemes implied that authorities did not have enough time to adequately inform farmers and prepare for implementation.	AT, BE- WA, CY, CZ, DE, EE, IE, MT, FI, PL	Interviews with MAs/ PAs and stakeholders Interviews with EU organisation (IFOAM)
POs and advisory services struggle with unclear selection criteria and financial requirements.	DE, FR, LV, LT	Survey of POs, Survey to advisory services
Ambiguous eligibility conditions for coupled support and sectoral interventions for apiculture.	LV, BG	Interviews with farmers

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

52 Preparation for eco-schemes was considered more burdensome than other interventions by MAs, PAs, and other Member State stakeholders interviewed for this study.

53 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2024): *Study on outcomes achieved by EIP-AGRI Operational Group projects under the CAP*, 2024, https://eu-cap-network.ec.europa.eu/publications/study-outcomes-achieved-eip-agri-operational-group-projects-under-cap_en.

54 An example was brought by the Irish MA: farmers who comply with GAEC 7 through crop diversification will not receive additional payment under other schemes that support the same practice (as crop diversification has been set as their 'baseline'), while other farmers who comply with GAEC 7 through alternative practices will. This creates a feeling of inequity and lack of transparency among farmers.

Frequently changing rules. The instability of rules is a cause of burden that, in some cases, delays or disrupts preparatory tasks (see examples in the table below).

During interviews with farmers, more than 5% of respondents in eight Member States mentioned changes to EU regulations and implementation or procedural rules occurring on a yearly basis or more often, sometimes in an untimely manner (e.g. when the call is open or during farming campaigns). This information was confirmed by interviews with MAs, PAs and Member State stakeholders with specific reference to the long procedures for amending CSPs, with changes that occurred during the preparation for a call. As shown by the survey, frequent changes to national guidelines affect LAGs as well.

Such regulatory instability makes it more difficult for beneficiaries to apply for long-term investments or to maintain five-year commitments, for instance. More in general, it is a well-recognised source of uncertainty [55], with potential impact on beneficiaries' planning and farming calendars.

Table 4. Frequently changing rules: examples from data collection

Frequently changing rules – examples	Member State	Source
Lack of coherence in changes, e.g. for direct payments, inclusion of a requirement to restore permanent grasslands while the call was open; crops not eligible under eco-schemes in 2023 that became eligible in 2024.	BG, CZ, DE, LT BE-WA	Interviews with farmers
Frequent modifications made to pieces of legislation and complex procedures for amending CSPs.	BE-WA, CZ, DK, IT, PT	Interviews with MAs/PAs and stakeholders
Frequent changes to national guidelines and specifications.	AT, BE-WA, DE, LV, LU, PL	Survey of LAGs

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

Multiple layers of legislation. This burden arises from overlapping EU and national rules, as well as additional gold-plating introduced by some Member States (analysed in RQ3). For instance, LEADER strategies must align with multiple overlapping legislative and strategic frameworks, including EU rules, national/regional strategies, sectoral guidelines and municipal plans e.g. frequently mentioned by LAGs in Austria and Italy. This complexity makes it harder for LAGs to follow a genuine bottom-up approach when preparing their LDS [56].

Further evidence from interviews with farmers, MAs, PAs, Member States stakeholders and advisory services suggests that CAP beneficiaries must comply with multiple sets of rules, including CAP regulations, non-CAP EU legislation, national laws, CSP provisions, calls, procedural rules and technical specifications. This administrative burden might result in duplicated requirements, inconsistencies and ambiguity in interpretation. Unravelling the requirements that arise from different legislations and making the right decision is part of the preparatory effort made by CAP beneficiaries [57].

Box 3. LEADER: Preparation of Local Development Strategies

Preparing LDSs is 'very burdensome' for 32% of the LAGs responding to the survey [58]. Less than 20% of respondents consider this task 'not burdensome'.

To prepare their strategies, LAGs involve the local community, collect and process data on the specific LEADER area, identify needs, objectives and interventions, define indicators for monitoring and self-evaluation. As mentioned above (multiple layers of legislation), the strategies need to be consistent with regional/national policy frameworks while ensuring that local needs are adequately targeted.

Despite the length of this process [59], LAG representatives recognise that strategic planning is key to the LEADER approach and do not in principle complain about this task. Nevertheless, most respondents find the preparation of local development strategies to be an excessively burdensome activity. Many (e.g. in AT, BG, EE, FI, IT, LT, SE, SI) mention the **unavailability of or difficulty in gathering figures and statistical data about the specific area** (i.e. with the required level of granularity).

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

55 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2025): Assessing simplification of the CAP for beneficiaries and administrations. Report of the Good Practice Workshop 7-8 November 2024. Budapest, Hungary, 2025, https://eu-cap-network.ec.europa.eu/publications/assessing-simplification-cap-beneficiaries-and-administrations_en.
56 Source: survey of LAGs.
57 Source: interview with CEJA.
58 Source: survey of LAGs.
59 E.g. reportedly up to seven months (FI) or 1.5 year (AT and DE).

In conclusion, the underlying factors that contribute to burden during the preparation phase are mainly related to the clarity and consistency of regulations. In terms of clarity, technical, complex or new terminology/concepts in regulations are difficult for beneficiaries to understand. In terms of consistency, frequent changes and overlaps in rules/regulations can create confusion and would require guidance and support to ensure beneficiaries keep up with changes and the multiplicity of rules.

Application

Box 4. Application: key findings

The application is the most burdensome procedural step for farmers and other beneficiaries, as confirmed by CSP authorities. The higher complexity is attributed to investments (burdensome for farmers, POs and wine growers and producers) and eco-schemes.

Causes of administrative burden are found in relation to the collection of evidence and proofs, as well as digital procedures for filling in and submitting application forms. Other challenges relate to the difficulty in complying with requirements and eligibility conditions attached to aid schemes.

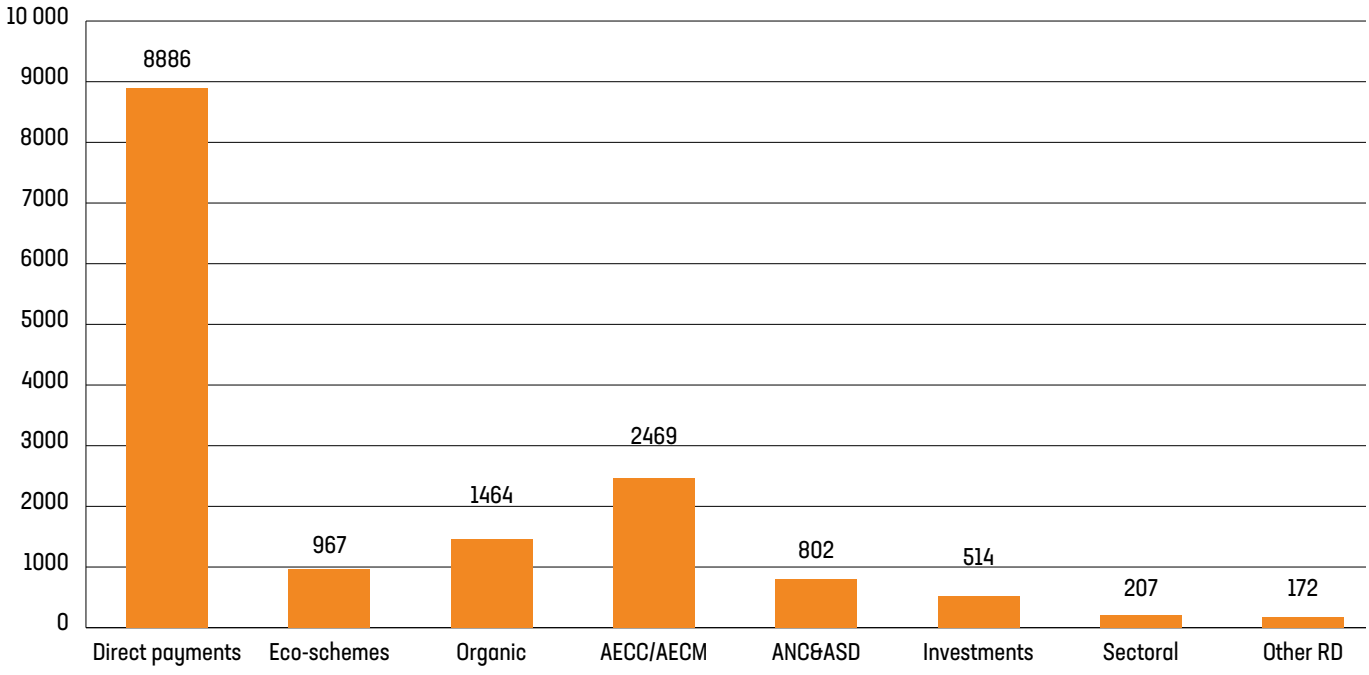
Follow-up activities for farmers may be required in order to correct errors on their application, which causes additional burden in some cases.

Specific causes of burden are related to the two-step application process for OGs and to the responsibility and tasks assigned to LAGs within the LEADER approach.

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

Before analysing the issues related to the application phase, it is relevant to have an overview of the interventions that farmers mainly apply for. The TC identified that the majority of farmers apply for direct payments, followed by agro-environmental-climate commitments(AECC)/ Agro-environmental-climate measures (AECM), organic farming schemes, eco-schemes, investments, sectoral and other rural development support (see figure 1).

Figure 1. Distribution of TC responses by group of interventions



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=11 535 respondents whose answers were classifiable)

Box 5. A closer look at farms applying for CAP interventions

Approximately 38% of farmers indicating the types of support they applied for represent farms from five to 50 hectares (the percentage of these farms in the EU is 29%), while 20% and 21%, respectively, manage farms between 51-100 and 101-250 hectares (at EU level, farms of more than 50 ha represent 8% of the total). Conversely, very small farms of less than five hectares, constituting 64 % of all EU farms according to official statistics, represent only 7% of responses to this TC question [60].

The analysis of CAP support types shows distinct patterns in adoption among farmers [61]. Not surprisingly, most respondents indicate receiving **direct payments**, with over three out of four respondents indicating this type of aid, particularly those managing larger farms over 50 hectares. **Eco-schemes** are indicated more frequently by younger farmers with larger size farms. **Organic-only** support, although representing a smaller portion of respondents, is mostly chosen by small and medium-sized farms (5-50 ha) and is more frequent among farmers aged 40-49, though not all in this group practice organic farming exclusively.

The **AECC/AECM** category, linked to management commitments, is more common among larger farms and slightly older farmers. Interventions for **ANC** and area-specific disadvantages (**ASD**) are chosen by a comparatively higher share of farms larger than five hectares and, more frequently than the general average, by respondents from the livestock and forestry sectors.

For **Investments** under rural development, there is a higher presence, compared to the general population, of farmers managing farms sized between five and 50 hectares and over 101 hectares, while the other size categories are slightly less represented. Conversely, respondents benefitting from **sectoral intervention** support represent more frequently farms smaller than 50 hectares compared to the total population, with a particularly higher percentage of farms under 5 hectares. Finally, in relation to **other RD** schemes, there is a higher presence, compared to the total respondents, of farms ranging between 101 and 250 hectares, while farms smaller than five hectares are less represented.

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

The farmers responding to the TC considered the process of applying for CAP support as 'highly complex', i.e. applying for investment support (81% of respondents who expressed an opinion), followed by applying for area-based payments (50% of respondents) and animal-based payments (44%). The complexity of 'additional environmental/animal welfare improvements', a category that includes other area and animal-based voluntary commitments (e.g. eco-schemes and AECC) for which CAP funding can be applied, was rated as 'high' by 80% of farmers [62].

MAs, PAs, and other Member State stakeholders expressed a very similar view about these types of interventions, identifying 'investments' and 'eco-schemes' among the main areas of burden of CAP: both were mentioned by more than one-third of the respondents and homogeneously across the EU (in 20 and 24 Member States respectively) [63].

All other sources of information used for this study confirmed the complexity of the application phase: 75% of the farmers responding to the interviews mentioned some burdensome tasks related to the application step (and 66% identified them as 'the most burdensome' ones) [64].

40% of LAGs and 42% of wine growers and producers considered the application phase 'very burdensome'. POs considered applying for sectoral interventions of medium complexity overall but judged applying for specific interventions, such as 'investments' and 'actions to mitigate and adapt to climate change', comparatively more burdensome. The same point was raised by wine growers and producers in relation to sectoral interventions, with 'investments for sustainability', 'restructuring and conversion of vineyards' and 'actions improving market knowledge' rated as more burdensome than the average. Looking at advisory services who are also CAP beneficiaries, the application phase is 'somewhat burdensome' for half of them but 'very burdensome' for a slightly lower share of respondents [65]. Furthermore, 30% to 40% of OG lead partners defined the tasks of going through the two-step application as 'very burdensome' [66].

The complexity of applications can be attributed to specific causes of burden:

- Collection of evidence and proofs (e.g. justifications of costs)
- Requirements or eligibility conditions difficult to comply with (this does not include GAECs and SMRs that are discussed in Section 4.1.3.2)
- Issues related to the use of digital tools or online platforms (including the identification of parcels)
- Time consuming follow-up of applications (e.g. to amend errors)

60 Source: European Commission's analysis of TC data.
61 Source: own elaboration of TC data.
62 Source: European Commission's elaboration of TC data.
63 Source: interviews with MAs, PAs and Member State stakeholders. The 144 interviewees identified a total of 548 main 'areas of burden' (each one selected up to five). Investments and eco-schemes were cited 60 (11%) and 56 (10%) times respectively. The application step, in particular, was considered the most burdensome one for investments and the second most burdensome for eco-schemes (after preparation) See also Section 4.1.3.3.
64 Source: interviews with farmers.
65 Source: surveys of CAP beneficiaries, including advisory services.
66 Source: survey of EIP-AGRI OGs. These beneficiaries, whose application process is peculiar (two-step application) will be mentioned further later in this section.

Preliminarily, it should be noted that application rules and procedures are a predominantly national competence. As mentioned in the introduction to this study, the NDM has given more leeway to Member States to design interventions, related conditions and control systems. However, as will be further illustrated in RQ3, EU legislation is sometimes called upon as a source of burden, either directly (e.g. in relation to some specific requirements arising from CAP Regulations [67] and the elements of IACS) [68] or indirectly (e.g. overregulation at national level attributed to the 'fear of audit' and sanctions, see RQ3).

Collection of evidence and proofs. The collection of evidence and proofs for applications can be a difficult and time-consuming task. Interviews with farmers show that it is particularly burdensome when applying for investment support, area-based schemes and, specifically, eco-schemes [69]. In particular, collecting evidence was indicated among 'the most burdensome tasks' by 22% of farmers.

Other sources of information are entirely consistent with this finding. POs, LAGs and EIP OGs also identified the collection of evidence as a burdensome activity [70]. In the wine sector, beneficiaries considered the main interventions (vineyards restructuring and investments) burdensome at least to some extent due to the excessive documentation and paperwork required [71].

Interviews with MAs, PAs and Member State stakeholders provide examples of reportedly excessive paperwork and extensive documentation required to apply for all non-IACS rural development interventions (e.g. investments, cooperation and sectoral).

As illustrated by the examples below, collecting evidence for investment interventions was identified as burdensome, in relation to the justification of costs [72], drafting of projects and business plans including difficult forecasts and indicators, gathering information through multiple sources and repeatedly submitting data already available to the administration.

For area-based and animal-based schemes the main reasons for burdensome data and proof collection include extensive documentation [73], requests to make difficult forecasts (e.g. about sowing or harvesting time), detailed recording of information about parcels, crops and animals.

EIP OGs report numerous and detailed information (e.g. action plans, budgets, timelines, indicators, communication plans) required by the administrations [74]. In some cases, these are aggravated by paper-based procedures or non-functioning online tools. A recent study on EIP OGs [75] has shown that OG's lead partners may find it difficult to provide detailed information for projects that can last several years. They also consider that projects dealing with 'innovation' have a degree of unpredictability, claiming flexibility when assessing applications or project modifications.

Table 5. Collection of evidence and proofs: examples from data collection

Collection of evidence and proofs – examples	Source
Investments: extensive business plans and gathering documents through several sources to justify eligibility conditions and costs are necessary for investment aid (LT, PL). Biodiversity scheme: requires extensive documentation, including photos of fields and counting grass species, which takes 15-16 days of work (IE). Eco-schemes: excessively detailed recording, e.g. recording of crop rotations by plot (scheme on direct sowing) or grazing animals by parcel (aid for extensive grazing) (ES); or multiple plans required, e.g. a nutrient management plan and a grazing plan for two eco-schemes, plus diplomas of competent agronomists/ veterinaries (BG). Multiple submissions of the same information: › Farmers manually enter sheep ear tag numbers despite data being in government records (DE). › Information already available in public registers must be re-submitted (PT).	Interviews with farmers

67 See, for instance, references to rules on irrigation, provided for by Article 74 of Regulation (EU) 2021/2115 and linked to the EU Water Directive.
68 IACS is provided for by CAP legislation but implemented through national choices and operational tools.
69 Source: interviews with farmers. Although most interviewees did not provide much detail about specific interventions, responses allowed for the identification of issues clearly related to investments and, to a lesser extent, drew some examples regarding area-based and animal-based schemes, including eco-schemes.
70 Source: surveys to POs, LAGs and EIP-AGRI OGs.
71 This is a case of contrasting perceptions between the beneficiaries and authorities contributing to this study. MAs, PAs and Member State stakeholders predominantly consider the wine sector as not presenting major issues, but this view is not completely aligned with wine growers and producers responding to the survey.
72 The justification of costs through a competitive bidding procedure involves excessive paperwork and is perceived as disproportionate for small investments and difficult to apply when only a few potential suppliers are available. For POs, this rule is hardly applicable to certain types of investment (e.g. investments representing the follow-up of previous ones) and does not allow for subsequent adjustments (e.g. lower prices) during the implementation of OPs.
73 E.g. management plans, photos, land use rights (very complicated in case of rented land in contexts with fragmented property), several measurements (of parcels, crops, animals, etc.).
74 Source: survey to EIP-AGRI OGs.
75 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2024): Study on outcomes achieved by EIP-AGRI Operational Group projects under the CAP, 2024, https://eu-cap-network.ec.europa.eu/publications/study-outcomes-achieved-eip-agri-operational-group-projects-under-cap_en.

Collection of evidence and proofs – examples	Source
Justification of costs through a competitive bidding procedure ('procurement rules' applied to private stakeholders) involving the submission of three (sometimes two) quotes for each purchase item (BE-WA, BG, DE, ES, HR, LT, MT, PT, RO). In the case of DE, the national legislation foresees sanctions if the applicant submits less than three bids. Farmers need to justify the use of purchased equipment only for specific crops (LT). Precision farming support is restricted to farms larger than 40 ha (SI). High documentation requirements for herd management to justify the movement of animals (FR). For direct payments, applicants are required to submit a reportedly 'large number of documents', including contracts with third parties (e.g. certifying or training bodies) (PT). Multiple submissions of the same information: › To apply for both CRISS and BISS, farmers have to submit separate applications, doubling their work, despite the two interventions having identical conditions (IE). › Duplicated information required for investment aid and direct payments (FR). › Eco-scheme requires the same data already submitted for obtaining the spraying certificate. It should simply require the certificate (BG).	Interviews with MAs, PAs and Member State stakeholders
Complex and overly detailed application forms, e.g. some LAGs use as many as 100 pages to describe the LEADER area (BE-WA). Multiple submissions of the same information: some LAGs are required to provide the same information multiple times (ES, PT).	Survey of LAGs
High complexity in demonstrating innovative features in EIP projects (ES). Burdensome documentation requirements for innovation projects (FR).	Survey of EIP OGs
Producer organisations report redundant paperwork for funding applications (FR). Operational Programme (OP) approvals require excessive reporting steps (DE). POs have to justify all investment costs included in their three to seven year OPs through transparent procurement procedures that may take very long and be even more complicated when costs change (LV). The three-bid rule to demonstrate the reasonableness of costs is a rigid requirement that involves excessive paperwork and does not allow for modifications (DE, ES). Producer Organisations are required to provide detailed documentation (including videos) to justify the time spent working for the OP and the activities carried out (CZ).	Survey of POs
Burdensome/extensive eligibility documentation for vineyards e.g. for land (PT, EL) and to prove ownership (BG). The submission of three offers is required, regardless of whether the activities will be performed by the applicant or a subcontractor (BG). Multiple submissions of the same information: the vast majority of grape growers have no variation in cultivated areas from one year to the next, and it is senseless to pay an external service for submitting each year, along with the CAP application, exactly the same data (DE, ES, FR, IT, PT). Vineyard mapping requirements create excessive paperwork (FR).	Survey to wine growers and producers

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

Meeting requirements and eligibility conditions attached to specific aid schemes, above all investments, eco-schemes and AECC interventions, can be difficult. 12% of the farmers interviewed for this study mentioned, as the most burdensome task, challenges related to complying with aid schemes' requirements and conditions [76].

Although demonstrating compliance entails some administrative burden, including proof-gathering and paperwork, the nature of the challenges illustrated in this section (see examples in the table below) is predominantly non-administrative. Beneficiaries were instead concerned by the fact that meeting certain requirements was difficult, not convenient or even illogical considering the reality of their farm or the objective of their project.

The main reasons behind 'difficult requirements' involve restrictive definitions; ambitious eligibility conditions which limit participation; unclear rules, including selection criteria, prone to misinterpretation or arbitrary assessment; financial prescriptions and limitations; and burdensome commitments to be fulfilled after the approval of the application [77].

Among the latter, a very frequently mentioned issue is the obligation to carry out farming operations (e.g. mowing, sowing, manure spreading) or other activities within strict deadlines that may not be realistically respected due to weather conditions or other unpredictable events. This is a cause of concern mentioned by farmers (see examples below) and reflected in the opinions collected from Member State stakeholders and EU organisations [78].

Further evidence of difficult requirements was provided by other CAP beneficiaries (examples in the table below). In some cases, LAGs considered that certain requirements imposed by national authorities were so restrictive as to jeopardise the bottom-up nature of LEADER approach [79]. LAGs are also subject to specific requirements and responsibilities arising from EU legislation [80]. These aspects are further analysed below.

Producer organisations (and representatives of MAs, PAs and Member State stakeholders) mentioned the obligation to dedicate 15% of their operational programmes' budget to environmental actions and 2% to research [81], considering these regulatory provisions particularly difficult for small POs and not functional to the aims of operational programmes [82].

Almost half of the respondents to the survey of wine growers and producers considered meeting requirements (including conditionality) as a very burdensome task while 32% of application time is spent in tasks such as compliance with conditionality and eligibility conditions (see RQ2).

Table 6. Meeting requirements and eligibility conditions: examples from data collection

Meeting requirements and eligibility conditions	Source
Minimum eligible area of five hectares for the straw incorporation measure. Deemed excessive, forced farmers to incorporate more straw than planned (IE).	Interviews with farmers
Deadlines for planting biodiversity areas (15 May) cannot be met if weather conditions do not allow sowing. Penalties apply if the deadline is not met (AT).	
Commitments to achieve indicators (e.g. increase in farm size, revenue, number of livestock units) are difficult because of unpredictable factors to be taken into account (e.g. livestock units, deaths, infertility) (LT).	
Requirement for grassland restoration changed during the application process (LT).	
Set-aside schemes. The deadline for ploughing was extended by 14 days but the extension was only communicated 10 days earlier, leaving farmers in uncertainty (DK).	
Requirement to communicate the dates of manure spreading for the following year (LU).	
Unclear requirements for coupled support in apiculture (BG).	
Rigid deadlines: a) that do not consider weather conditions, with different dates for meadow mowing, depending on the aid scheme; and b) for spreading, which is prohibited with snowy or frozen ground, but definitions of snowy and frozen ground are unclear (BE-WA).	

76 Source: interviews with farmers.
77 Source: interviews with farmers and interviews with MAs, PAs and Member State stakeholders.
78 Sources: interviews with farmers. interviews with MAs, Pas, Member State stakeholders and EU organisations (CEJA, COPA-COGECA).
79 This consideration, as further exemplified in the table, reflects the 'not very positive' judgments of LAG managers and members in relation to 'adequacy of administrative procedures for project funding at RDP level', mentioned, with reference to the 2014-2022 programming period, in European Commission: Directorate-General for Agriculture and Rural Development, *Evaluation support study of the costs and benefits of the implementation of LEADER – Final report*, Publications Office of the European Union, 2023, p. 186, https://op.europa.eu/en/publication-detail/-/publication/cc1e7d6f-7eb3-11ee-99ba-01aa75ed71a1/language-en.
80 Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy, *OJ L 231, 30.6.2021, pp. 159-706.*
81 As per Article 50 (7) of Regulation (EU) 2021/2115.
82 In addition, for some POs, Articles 46 and 52 of CSP regulation are unclear and prone to misinterpretation, as they do not specify when the objectives and the related financial thresholds should be met (e.g. at the end of the programming period or each year). Sources: survey to POs, interviews with MAs, PAs and CSP stakeholders.

Meeting requirements and eligibility conditions	Source
Sectoral intervention compliance rules are seen as restrictive and unclear (IT). Regulatory provisions are difficult to comply with (Article 50(7) of the CSP regulation); threshold is very high: at least 15% of the expenditure of OPs must be dedicated to environmental objectives and 2% to research and development. Difficulty of including at least three different environmental actions to comply with another requirement set by Article 50 (7) (FI). R&D and environmental actions pose further challenges, e.g. high investment costs for the former and limited choice of suitable interventions for the latter (AT, ES). Complexity, coupled by difficult requirements (full details and documents concerning the five to seven year investment programmes are requested in the application) (PT).	Survey of POs
Regulatory provisions for POs difficult to comply with (Article 50 (7) of CSP Regulation); threshold very high: at least 15% of expenditure of OPs must be dedicated to environmental objectives and 2% to R&D; survey of POs, (BE-FL, ES, FI, PT); interviews with MAs, PAs and Member State stakeholders (CY, CZ, EL).	Survey of POs Interviews with MAs, PAs and Member State stakeholders
POs operational programmes: complexity, coupled with difficult requirements (full details and documents concerning the five to seven year investment programmes are requested in the application) (LV, PT). National manure regulations overlap with CAP rules (NL). The late submission of documents (e.g. for soil analysis or seed certification) causes frequent sanctions and the rigidity of requirements push farmers to withdraw from CAP aid (SK). Farmers forced to meet strict calf registration deadlines (FI). Eco-schemes examples of 'difficult requirements': › Prohibition of glyphosate in the no-tillage scheme (BE-WA). › Commitment to reduce or eliminate synthetic fertilisers in the scheme on cultivation of crops with less demand for water (MT). › Restrictions on grazing and mowing in the scheme on perennial grasslands (SK). › Requirement to reduce nitrogen by 10% for all crops in the eco-scheme for restoration of soil potential (BG). Investments examples of restrictive eligibility conditions: › Unnecessary limitation on the use of purchased equipment (e.g. a tractor or an irrigation system bought for one crop cannot be used for another crop) (LT). › Obligation to insure (or present three insurance refusals) co-financed assets (LT). › Investments in precision farming can be done only by farms with more than 40 hectares (SI). › Several key investments for the pig sector are not eligible (SK). › On-farm investments in energy production are made difficult by the requirement to clearly identify household and agriculture consumption (PL).	Interviews with MAs, PAs and Member State stakeholders

Meeting requirements and eligibility conditions	Source
Investments in irrigation: › Restrictions on irrigation set by Article 74 of Regulation (EU) 2021/2115 (e.g. on use of groundwater, extension of irrigated areas, creation of new irrigation systems) hinder the development of farms (CY, MT). › Conditioning the eligibility of new irrigation systems to the achievement of 15 % water saving is unsuitable in a country where modern irrigation techniques are already widely applied [83] (CY). › Rules on water overlap/conflict with national legislation on forestry and urban planning (CY).	Interviews with MAs, PAs and Member State stakeholders
Some countries imposed additional restrictions on eligible expenditures and strategy amendments, affecting flexibility (BE-WA, DE). Defining transparent selection criteria requires balancing local needs, objective assessments and fairness (IT). Some LAGs struggle to comply with financial and operational rules, e.g. rigid budget allocation rules (IT). Selection criteria and checks at central level, cause delays and reduce flexibility for LAGS (BE-WA, CY, BG). Difficult to avoid conflicts of interest particularly due to the nature of small communities, where everybody knows each other and people frequently carry out multiple activities and work together (DE, CZ, PL, SE). RuleS that prevents a single interest group from controlling decisions is also difficult to apply (DE, HR, PL).	Survey of LAGs
Impractical replanting deadlines are not aligned with farming calendars (DE, PT). Difficulty in calculating economic indicators for investments and time pressure for filling in the application in February (FR).	Survey of wine growers and producers

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

Issues related to digital tools or online platforms. The use of technology in the application stage can be a source of burden. CAP application is an increasingly digitalised process. 75% of farmers interviewed for this study submitted online applications and an additional 12% 'both online and physical applications'. Only 13% of the interviewees submitted only physical applications [84]. In particular, area- and animal-based interventions are applied for, monitored and controlled through the Integrated Administration and Control System [85].

Evidence from interviews with farmers shows that 30% of respondents mentioned the task of 'filling in and submitting the application form' as the most burdensome among those performed to apply for CAP aid [86]. More than half of them mentioned burdensome 'map drawing' and 'identification of parcels', which can be time-consuming and particularly challenging in relation to the identification of landscape elements and field borders, the misalignment between aerial or satellite images with cadastral maps or the 'actual situation of the farm'. Recording of animals in the application system is also reportedly burdensome. Other farmers were concerned by issues with (national) application tools or platforms that were considered not user-friendly or not properly functioning [87].

Wine growers and producers identified similar challenges [88]. More specifically, several of them (see examples below) considered the yearly submission of the same data regarding vineyards unnecessarily burdensome.

On the positive side, it should be noted that 20% of the interview sample (298 farmers) did not mention any burdensome task in relation to the CAP application, specifying that all worked smoothly with no acceptable level of effort. Also, almost 15% of respondents expressed positive opinions on the IT systems used for application.

Information from beneficiaries is complemented by interviews with MAs, PAs and Member State stakeholders. Around 10% of respondents mentioned issues related to IACS elements (land parcel identification system and geospatial application) and not user-friendly national platforms. For some of them, the increasing digitalisation of the CAP clashes with the lack of digital skills of many farmers, in particular older and less educated ones.

83 Article 74 of Regulation (EU) 2021/2115 foresees that a certain degree of potential and actual reduction of water consumption must be established in CSPs as eligibility conditions for investments in irrigation systems. However, this percentage is to be fixed by Member States.
84 Source: interviews with farmers.
85 Besides having some leeway in relation to IACS element (e.g. the choice to adopt an 'automatic claim system'), Member States operationalise IACS through national platforms, databases and tools.
86 Source: interviews with farmers.
87 Source: interviews with farmers.
88 Source: Survey of wine growers and producers.

Table 7. Use of digital tools in CAP application: examples from data collection

Issues related to digital tools or online platforms	Sources
Digital applications replacing manual processes, leaving older farmers excluded, especially in the absence of clear, user-friendly guidelines on how to use geospatial applications (SK). Land identification errors in digital applications lead to application rejections (SK). INVEKOS GIS tool is seen as overly complex for land mapping (AT). Farmers struggle with unclear user manuals for CAP application software (FI). Farmers struggle with unclear satellite imagery for boundary identification, especially in very small farms (NL). Automatic or frequent updates in land parcel records create discrepancies and confusion for farmers (PT, SK, FR). Some farmers do not see the advantages of technology but rather consider it as a further burden (DE). Eco-schemes: filling in the graphic parcel register, parcel by parcel, took the farmer 80% of the total time spent on the application (FR).	Interviews with farmers
Plot identification is a time consuming task regarding the restructuring and replanting of vineyards intervention (ES, FR).	Survey of wine growers and producers
Frequent updates to the land parcel identification system and time-consuming procedures linked to the geospatial application complicate the application process (BG, DK, ES, LT, NL, PT, SK). Poorly functioning, non-user-friendly or outdated IT systems that require substantial improvements (BE-WA, BG, EL, IE). CAP digitalisation is a significant challenge for older and less educated farmers (AT, IE, HU, LV, MT).	CSP authorities and stakeholders
Burdensome uploading of information in the application platform (DE, ES).	POs

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

Time consuming follow-up activities. Follow-up activities on CAP application relate to specific requests from authorities or the opportunity to correct errors ('right of error'). Error alerts ('early warning system') relate to claimed areas (including crops, borders, and landscape elements) that do not meet eligibility conditions or do not coincide with satellite images. Other reasons for following up on applications relate to missing documents, clerical errors or clarification requests.

According to the TC, in 2023, 36% of farmers received error alerts from authorities [89]. Furthermore, 50% of TC respondents reported using mobile devices to provide geo-tagged photos to authorities (this is slightly lower for farmers over 65 years old and farmers with practical experience only) and approximately half of them (i.e. approximately 25% of respondents) expressed issues with geo-tagged photos. The most recurrent issues pertain to difficulty in using this tool, applications not functioning and the time-consuming nature of this task. Advisors responding to the TC shared the same concerns but were generally less critical than farmers [90].

Similarly, around one-third of farmers interviewed for this study said they were contacted by authorities after submitting applications [91]. Although most farmers welcomed the opportunity to correct their applications, some challenges were reported in relation to the burden of additional tasks and the uncertainty linked to this process (see examples in the table below) [92]. The most frequently mentioned follow-up activity relates to verifying or amending applications after error alerts based on satellite images and is associated with the request to take geo-tagged photos of fields and crops. Interviews with MAs, PAs and Member State stakeholders provided further information on follow-up activities. In particular, interviewees in several countries focused on the area monitoring system (AMS) and geo-tagged photos, mentioning issues related to the inaccuracy of satellite images, delays in error notifications, inadequacy of national infrastructures and additional burdens placed on some farmers (see examples below) [93].

89 European Commission's analysis of targeted consultation data.
90 European Commission's analysis of targeted consultation data.
91 Follow-up activities mostly ended up solving the problem (69 'positive' feedback reported against 26 cases of payment reductions or pending issues), frequently with little or no additional burden. Source: interviews with farmers.
92 Source: interview with farmers.
93 Source: interviews with MAs, PAs and Member State stakeholders. It should be noted that most interviewees welcome the application of 'right of error'. Also, some respondents (EE) are actively engaged in communicating the benefits of geo-tagged photos (e.g. less on-the-spot-checks) to reluctant farmers.

Table 8. Follow-up on CAP application: examples from data collection

Time consuming follow-up activities	Source
Delays in receiving information on possible errors leading to payment reduction (LT). Follow-up implied numerous exchanges with authorities and continuous monitoring of the application (DE, SE), occurring as frequently as five times per year, suggesting that national authorities were applying more rules. Excessive requests for geo-tagged photos (approximately 2 000) may be too burdensome for authorities to review (DE, EE).	Interviews with farmers
Half of the total number of beneficiaries in 2023 (15 000 out of 30 000) received error notifications. The use of geo-tagged photos was effective only in regions where dedicated pilot projects had been implemented (ES). Geo-tagged photos are a burden for older farmers (HR, PT, SI), small farms (PT) and unskilled farmers (MT, SK). Technical issues with geo-tagged photos (SE, PL). The implementation of area monitoring system conflicts with inadequate digitalisation at national level (EL, MT). Geo-tagged photos place the burden of proof on farmers (HU, LT, SK).	Interviews with MAs, PAs and Member States stakeholders

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

The two-step application model for EIP-AGRI Operational Group projects

The earlier mentioned study on the outcomes of OG projects in 2014-2022 [94] has shed some light, among other aspects, on national and regional approaches to the EIP-AGRI instrument and the administrative burden for OG projects in the 2014-2022 programming period.

Administrative burden emerged as a concern for many OGs, with reference to the implementation and reporting procedures. Strict requirements, long payment times and reduced use of simplification tools, such as SCOs, represented the most critical aspects.

Due to the early stage of implementation of 2023-2027 CSPs, the newly selected OGs participating in the survey have mostly focused on the preparation and application stages (the successive steps of the process show a lower response rate) [95].

While some concerns were raised in relation to the lack of sufficient support during the early stages (see previous part on 'preparation' in this section), OG Lead Partners widely reported challenges related to the second step of the application [96], mentioning **burdensome evidence collection**: detailed information, proofs, notarial deeds, cost calculation and justification and personnel costs in particular (AT, DE, FR, IT, LV, NL, SE) [97]. Similar issues (above all cost eligibility and justification) were mentioned during interviews with MAs, PAs and Member State stakeholders in BG, ES, HU, LT, MT, PT and SI.

In addition, OG Lead Partners participating in the survey mentioned some challenging **requirements and eligibility conditions**, for instance, difficulty in providing co-financing (BE-FL, DE), lack of flexibility related to project modifications (AT, IT), complexity of partnership coordination (DE) and dissemination actions (BE-FL) [98].

Consistent with evidence from the previous study, interviews with MAs, PAs and Member State stakeholders raised a claim for **a larger application of SCO** [99]. In addition, respondents from BG, EL and HR highlighted the lack of advance payments as a hindering factor for OG projects in the past programming period (advance payments are allowed for COOP interventions in the 2023-2027 CAP).

Respondents from CY, IT, LV and RO [100] found a cause of complexity in the way the **two-step application procedure** had been implemented in the previous programming period. In the case of LV and RO, they added that the 2023-2027 CSPs have shifted to a one-step procedure. However, both countries are reportedly engaged in providing more support to OGs to find partners and prepare projects.

94 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2024): Study on outcomes achieved by EIP-AGRI Operational Group projects under the CAP, 2024, https://eu-cap-network.ec.europa.eu/publications/study-outcomes-achieved-eip-agri-operational-group-projects-under-cap_en.

95 Source: survey to OGs.

96 In the model outlined by the European Commission, a (funded) first step of the application process should be dedicated to setting up the OG partnership and the preparation of the OG project, while a second step should enable the selection of OG projects.

97 Source: survey to OGs. These findings mirror what was already shown by the previous study; for instance, some OG lead partners find it difficult to provide detailed information, cost plans and timelines for innovation projects and yet claim flexibility when assessing applications or project modifications.

98 Dissemination of OG project results is required by Article 127 of Regulation (EU) 2021/2115 and is key to the EIP-OG instrument. The previous study has found that dissemination may indeed prove difficult for OGs, particularly if they do not include communication experts or partners with networking capacities (e.g. advisors). Institutions and national stakeholders (MAs, CAP networks, advisory services) should assist OGs in this task by providing expertise, guidelines and tools.

99 An overview of the responses shows that SCOs were introduced and/or continue to be used in at least BG, LT, RO and SI, while interviewees from ES and HU noted that SCOs should be adopted, with a respondent from PT arguing that they need to be extended. According to one Bulgarian interviewee, although simplified costs are implemented in the country, beneficiaries are still required to provide offers and invoices (this may be linked to the SCO not being updated to account for inflation). Source: interviews with MAs, PAs and Member State stakeholders.

100 Source: interviews with MAs, PAs and Member State stakeholders.

Finally, according to other respondents (CY, CZ, ES, IE, HR, IT, RO, SI) [101], **cultural or practical barriers may hinder cooperation**. More specifically, these interviewees mentioned:

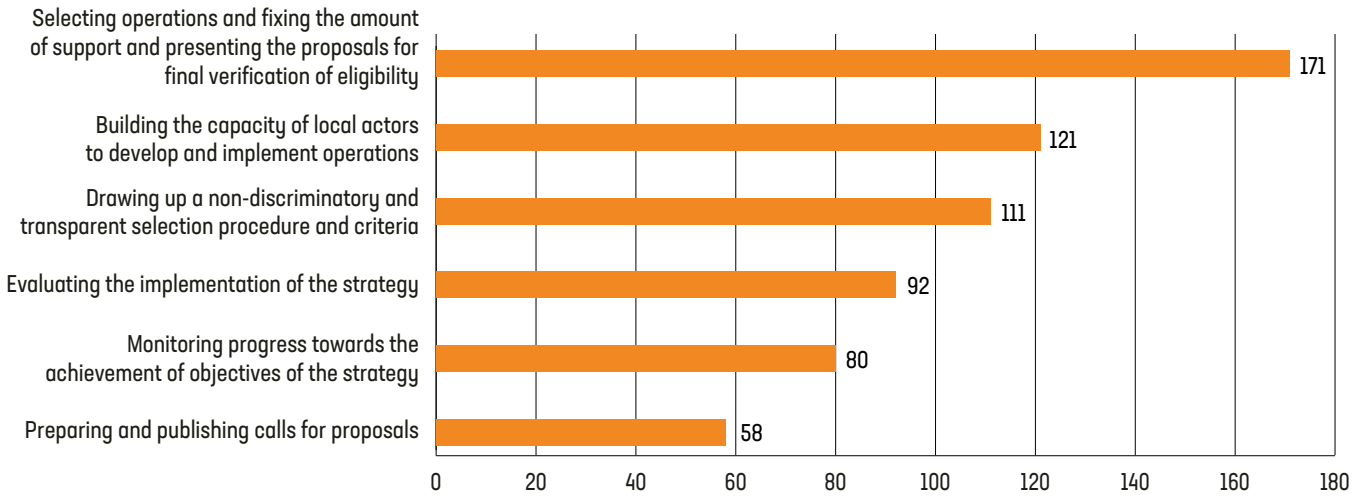
- Lack of 'culture of cooperation', with partners not genuinely interested in joining OGs; lack of trust and reciprocity among partners.
- Structural disadvantages (e.g. lack of infrastructure, legal uncertainty around cooperative models) reduce the effectiveness of cooperation compared to more organised contexts.
- Bringing partners of different natures together poses organisational and communication challenges that are not easily overcome. Farmers could be further incentivised to join OGs. The opportunity to grant support irrespective of the actual success of the innovative solutions is deemed positive.
- Coordinating partners and agreeing on financial arrangements have proven difficult. Administrative burden further complicates the lives of OGs that struggle to find effective collaboration.
- Maintaining cooperation after the end of the project is often impossible due to a lack of continuity in support.

Specific requirements for LAGs in the implementation of LEADER

Regulation (EU) 2021/1060 [102] assigns specific responsibilities to LAGs in the context of the Community-led Local Development approach (CLLD, known as LEADER under the EAFRD). These include building the capacity of local actors, drafting a transparent selection procedure, preparing calls and selecting operations, and monitoring and evaluating LDS. LAGs were asked to select up to three tasks they consider burdensome to fulfil and their responses indicate that the most difficult activity is the selection of operations, while preparing and publishing calls for proposals is perceived as the least burdensome one [103].

As pointed out by some respondents (e.g. in AT, DE, IE, LT, PL), **many LAGs face resource constraints in terms of staff, expertise and funds**. Frequent employee turnover [104] and the LAGs' poor administrative capacity were also mentioned in BE-WA, CZ, ES and HR.

Figure 2. Tasks perceived as most burdensome among LAGs



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of LAGs survey data, N=356 (multiple choices available, up to three)

In relation to the **selection of operations**, respondents pointed out that the process is time-consuming and **implies taking responsibility for the correct allocation of funds**. Burdensome tasks related to this activity may involve, depending on the delivery model in place, helping applicants deal with rules, procedures and tools, carefully checking projects and supporting documents, communicating with selection committees or external authorities responsible for final decisions, reporting on the selection process and notifying decisions to beneficiaries.

'**Building the capacity of local actors to develop and implement operations**' was ranked as the second most burdensome activity. Respondents highlighted several issues, ranging from the **'passive' attitude of local communities** to the **lack of sufficient resources on the LAGs' side**. Administrative burden linked to applying for funds and poor capacity to pre-finance or co-finance projects demotivates potential applicants. Several German respondents mentioned the difficulty of involving volunteers as LAG members or workers as a result of high workloads, overlap with ordinary activities and a general decline in volunteering [105].

101 Source: interviews with MAs, PAs and Member State stakeholders.

102 Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy, OJ L 231, 30.6.2021, pp. 159-706.

103 Source: survey of LAGs.

104 Also mentioned during the interview with ELARD.

105 These findings seem to undermine LEADER's capacity to involve and strengthen communities. Voluntary work itself is seen as an important investment for LEADER. See European Commission: Directorate-General for Agriculture and Rural Development, *Evaluation support study of the costs and benefits of the implementation of LEADER – Final report*, Publications Office of the European Union, 2023, https://op.europa.eu/en/publication-detail/-/publication/cc1e7d6f-7eb3-11ee-99ba-01aa75ed71a1/language-en.

Box 6. Farmers who decided not to apply for certain CAP support

In both the TC and follow-up farmers' interviews [106], respondents were asked whether they had decided not to apply for certain CAP support in 2023 and the motivations for their decision.

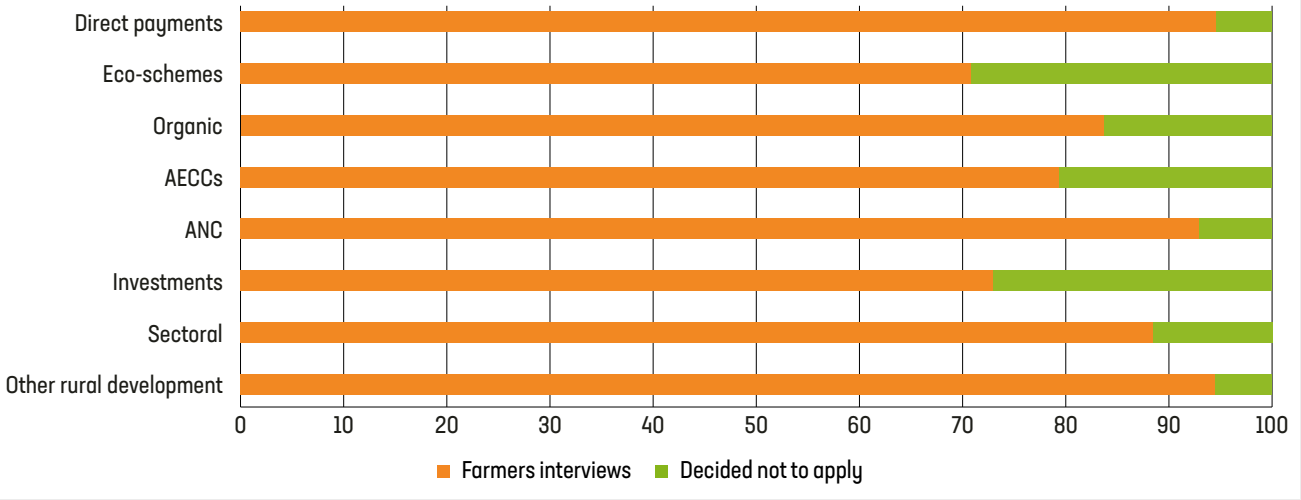
Just less than one-third of TC respondents (29% of the over 26 000 respondents, all beneficiaries of CAP support) indicated not applying for certain CAP aid schemes. The decision not to apply for CAP support appears slightly higher in mixed farms (33%) compared to farms specialised in crops (27%) and livestock production (29%).

Similarly to the proportion of TC respondents, about one-third of interviewed farmers (106) claimed notto have applied for one or more CAP aid schemes. **In most cases, farmers did not apply for eco-schemes and/or agri-environmental measures under rural development** (80 farmers). **Twenty-two farmers mentioned investments or other rural development interventions**. All Member States are represented, with numerous examples from Germany (12 farmers, of which seven from Baden Württemberg, all mentioning environmental schemes), Austria (eight references, also regarding environmental schemes), Bulgaria (10 farmers claimed not having applied for aid schemes), and Lithuania (seven answers, mostly related to investments).

Among the TC respondents to the question (an open-ended question) of whether they had decided not to apply for certain CAP support, only 46.4% (approximately 2 500 respondents) provided richer answers (i.e. which schemes they did not apply for and the reasons for not applying) that could be analysed and classified. TC findings and interview results are clearly aligned, as shown in the following graph.

For every 100 farmers who applied for direct payments, about six farmers decided not to apply. The ratio rises to nearly 30 farmers out of 100 not applying for eco-schemes and investment support and 21 farmers out of 100 not applying for AECCs.

Figure 3. Farmers who applied vs farmers who decided not to apply for CAP support



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=2 517, N°. of respondents with classifiable answers)

Forty-five interviewed farmers (40% of respondents claiming not to have applied) decided not to apply for certain schemes due to their **complexity** [107].

Complexity was often mentioned by interviewed farmers also in relation to investments. This finding is confirmed by TC results, where respondents declared that complexity and lack of clarity of rules made them reluctant to apply.

For 34 interviewed farmers (30% of respondents claiming not to have applied), the proposed schemes were **not economically viable for their farms**.

A further 39 farmers (35% of respondents claiming not to have applied) did not apply to certain aid schemes because they could **not meet the requirements for technical or structural reasons**. This result is confirmed by TC findings, specifically in relation to animal welfare commitments. Finally, 19 interviewed farmers stressed that they did not apply for certain CAP schemes because they **did not understand the rules, did not find enough information or did not receive adequate support from the authorities**.

Further motivations were provided by TC respondents, such as the imposed long-term commitments and funding not covering the costs (i.e. in relation to AECC, organic farming and investments), excessive paperwork and administrative burden (i.e. eco-schemes and area-based interventions) and complicated implementation conditions and deadlines (i.e. investments).

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

106 It should be noted that 298 interviews were conducted across all 27 Member States with farmers participating in the targeted consultation and they had given their consent to be contacted for an interview.

107 Source: interview with farmers.

In conclusion, the application stage is the most burdensome procedural step due to a multiplicity of factors. The collection of evidence and proofs, e.g. to justify costs and other eligibility conditions, entails excessive documentation in terms of both length and detail, as well as multiple submissions of the same information. Requirements and eligibility conditions are difficult to comply with, not only because of the detailed proof gathering but particularly due to non-administrative challenges, such as restrictive definitions, strict commitments to comply with or lack of clarity, which in turn can lead to misinterpretation. The use of digital tools, despite their virtues in enabling online applications, entail drawbacks, ranging from the time-consuming requirements (map drawing, land parcel identification) to the lack of digital skills of older farmers. The follow-up of applications offers farmers opportunities to correct errors; however, the burden arises due to excessive requests, delays from authorities, or the time-consuming task of obtaining high-quality, geo-tagged photos. Further specific burdens exist for EIP OGs as a result of the two-step application process and for LAGs due to resource constraints, which limits their ability to build the capacity of local actors and implement their LDS.

Recording and reporting

Box 7. Recording and reporting: key findings

Summary of findings:

Farmers record and report information to fulfil their obligations and for their own purposes ('business as usual'). Furthermore, recording and reporting are not only related to CAP support but are often linked to other sources of EU or national legislation.

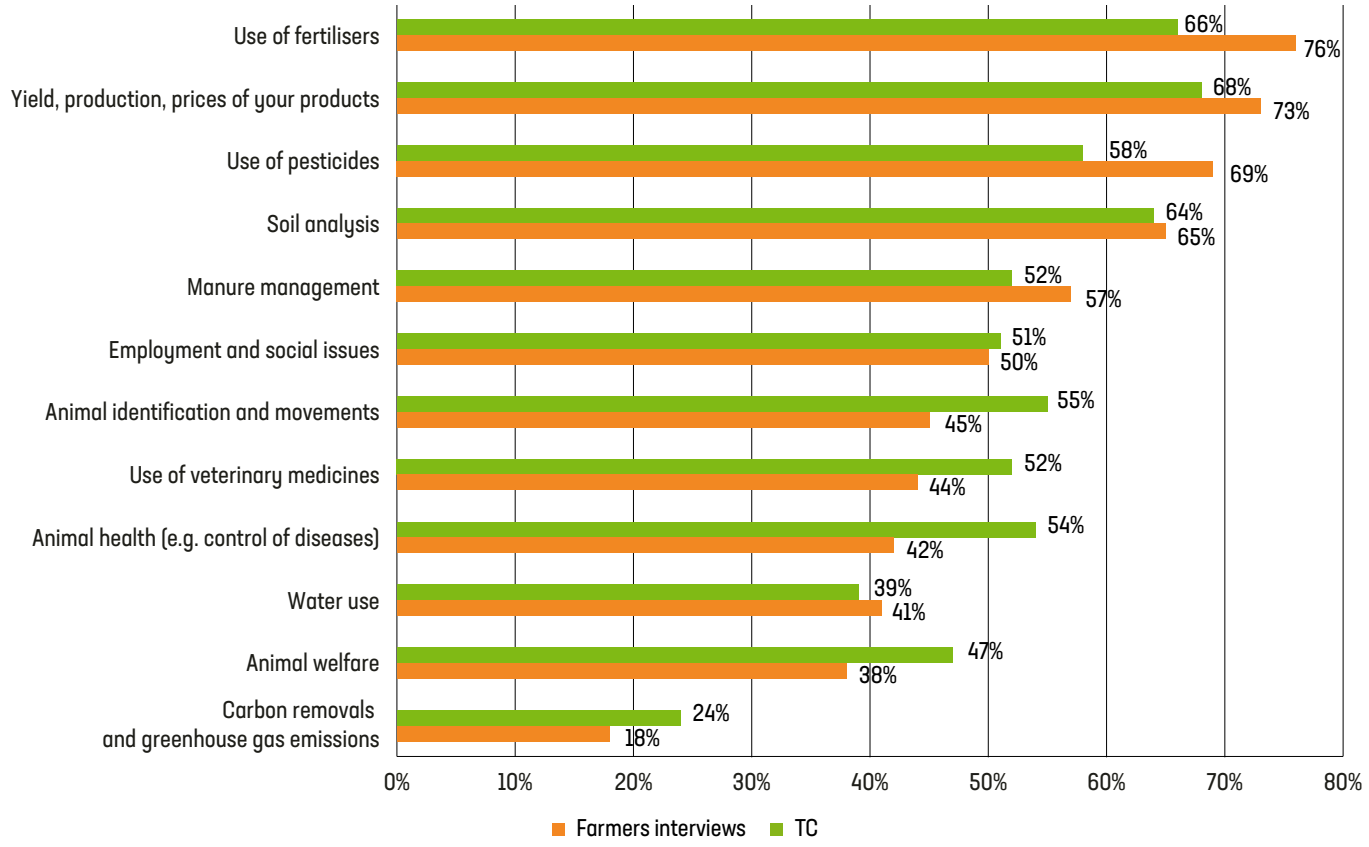
Obligations arising from multiple sources may cause excessive or repetitive recording and reporting tasks. Burdens may be also related to technical difficulties linked to recording and reporting systems.

Cases of burdensome recording and reporting are associated with all requirements and interventions, with wine growers and producers raising more frequent concerns.

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

The TC identified that farmers record various types of information (obligatory or for own use), the four most commonly used are on fertilisers (76% of TC respondents), production yields and prices (73%), on the use of pesticides (69%) and soil analysis (64%) [108]. Interviews with farmers confirmed the same four predominant categories identified by the TC, with only slightly lower percentages of respondents who record and report these types of information.

Figure 4. Distribution of categories for which farmers declare to record and report information



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmers interviews' data, N=298 (multiple answers allowed) and TC data, N=26 886 (multiple answers allowed)

108 European Commission's analysis of TC data.

Recording and reporting activities carried out by farmers are partly not related to the CAP as they fulfil other (predominantly national) requirements or management purposes, including farmers' own purposes [109] (see Box 8). Recording and reporting are also relevant for conditionality and area and animal-based CAP schemes (e.g. recording of farming operations, pesticides, animals) as well as for non-IACS interventions (e.g. reporting of expenditures, submission of payment claims). The sources of information used for this study identified the following causes of burden in the recording and reporting phase:

- Excessive or time-consuming recording and reporting.
- Repeated or continuous submission of the same information.
- Limited or inefficient use of digital tools for recording and reporting purposes.

Excessive or time-consuming recording and reporting

Interviews with farmers discussed the recording and reporting activities of 258 respondents (the other 40 farmers did not indicate any recording and reporting). 13% of them said that recording and reporting are not burdensome for them, as it takes little time, is simplified with the use of digital tools or would be performed in any case as part of the daily work on the farm [110]. However, the majority of these farmers mentioned frequent, time-consuming recording or burdensome reporting tasks, mainly due to the amount of information to collect, keep and submit to one or several authorities.

Similarly, 32% of wine growers and producers considered recording and reporting (for CAP in general) 'very burdensome'. These beneficiaries provided several examples of burdensome recording and reporting for both the CAP and other sources. Recording and reporting is 'very burdensome' for 30% of LAGs but generally less burdensome than other procedural steps for POs [111].

In relation to EIP OGs, the limited evidence available from newly selected OGs can be complemented with the experience of 2014-2022 programming period, with OGs frequently concerned with burdensome reporting procedures, rigid rules, financial limitations (e.g. it was difficult for farmers to be paid for their work in the projects), long payment times and reduced use of SCOs [112].

More than 60 interviewed CSP authorities and national stakeholders mentioned recording and reporting as a cause of burden for beneficiaries [113].

Table 9. Excessive and time-consuming reporting: examples from data collection

Causes of burden associated with the CAP – examples	Sources
Wine growers are subject to 14 different information obligations concerning seeds, production, plant protection, harvesting, packaging and other aspects (FR). High number or frequency of declarations (BG, DE, FR, PT, ES).	Survey of wine growers/ producers
LEADER: burdensome reporting requirements and proof of expenditure for small projects (BE-FL, CZ, DE, FR, IE, PT). Animal-based interventions: burdensome recording for animals (e.g. ear tags, dates) (FI, HR, SE, SI).	Interviews with MAs, PAs and Member State stakeholders
Burdensome reporting on the justification of costs incurred by the project (BG, HU, LT, MT, PT, SI, SP). Each OG partner submits a separate payment claim, which makes the procedure more complex (PT).	Survey of EIP OGs

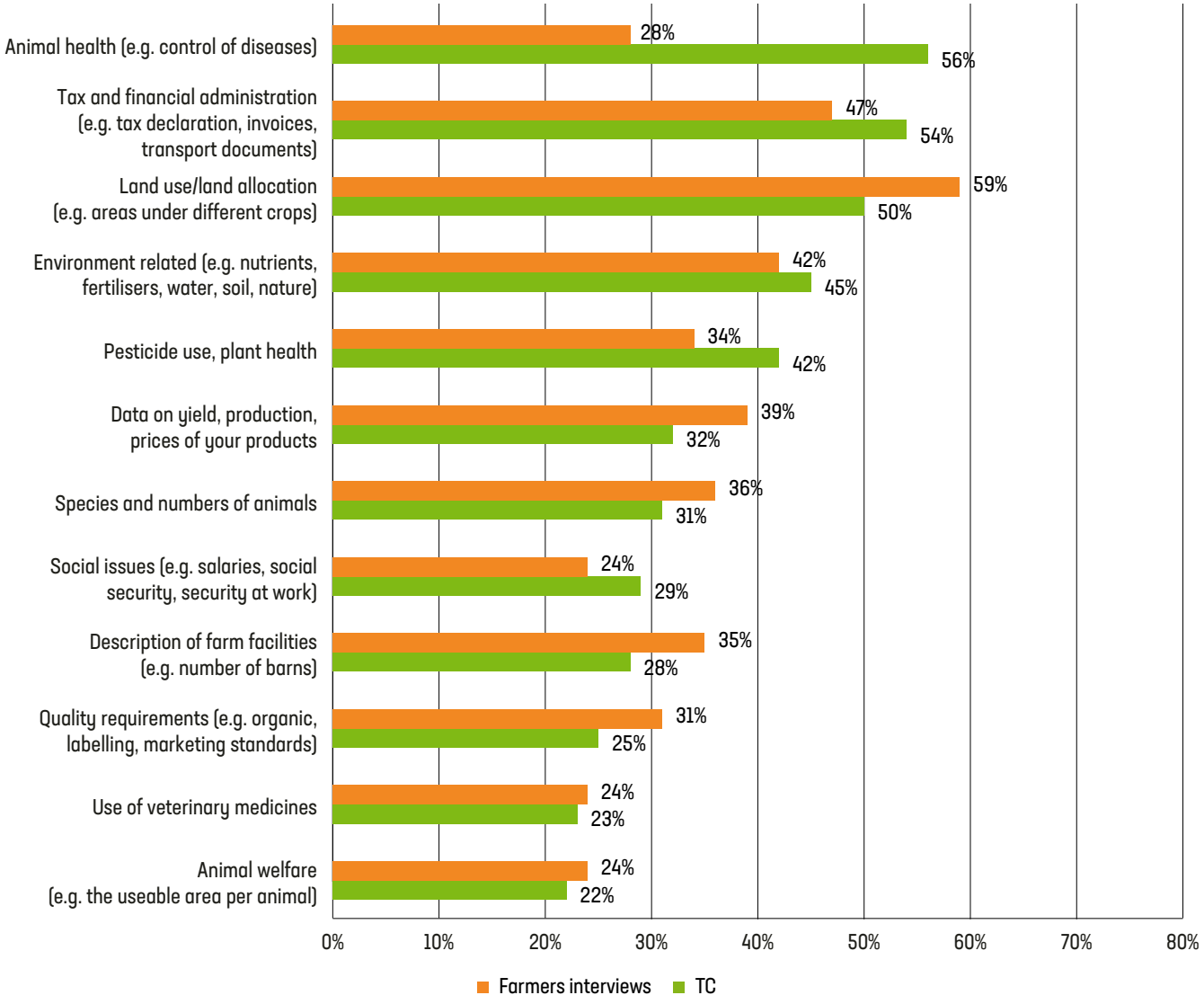
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

The TC stressed the multiple reporting of the same data. 44% of respondents indicated that they have been required to report the same information (including proofs) several times, while this has not occurred to 50% of farmers. The pieces of information that are most frequently reported multiple times refer to 'tax and financial administration' and 'land use/land allocation', selected by more than 20% of respondents. Slightly less than 20% of farmers reported several times data on 'environment related' and 'pesticide and plant health' [114].

109 Source: interviews with farmers.
110 Source: interviews with farmers.
111 Source: survey of wine growers and producers.
112 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2024): Study on outcomes achieved by EIP-AGRI Operational Group projects under the CAP, https://eu-cap-network.ec.europa.eu/publications/study-outcomes-achieved-eip-agri-operational-group-projects-under-cap_en.
113 Source: interviews with MAs, PAs and Member State stakeholders. Some respondents associated burdensome recording and reporting obligations with requirements arising from CAP regulations (GAECs mentioned seven times), or non-CAP legislation (six citations for rules on pesticides; other citations for rules on animal welfare, animal identification, veterinary products, rules on fertilisers, rules on nitrates and public procurement). Other respondents linked recording and reporting with CAP schemes, particularly area and animal-based interventions (14 citations), eco-schemes (cited 11 times), non-IACS rural development interventions (11 citations) and sectoral interventions (three citations). Other citations pointed to other issues, such as the overlapping between CAP and national legislation or the difficulty in using digital tools in recording and reporting tasks.
114 European Commission's analysis of TC data.

These findings were confirmed by the interviews with farmers, with multiple reporting mentioned by 47% of respondents and 'land use/land allocation' (28%) as the most represented category, followed by 'tax and financial administration', 'environment related' and data on 'yield, production and prices' [115].

Figure 5. Distribution of categories for which farmers have declared they had to report the same information several times



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmers interviews' data, N=140 (no. of farmers who declared to have reported the same information several times) and TC data, N=11 707 (no. of farmers who declared to have reported the same information several times)

During the interviews, 20% of farmers provided more detail about repeated reporting of information [116]. Wine growers and producers provided further examples, as well as MAs, PAs and Member State stakeholders (see examples below). Repeated reporting includes:

- submission of information as part of CAP aid procedures (e.g. personal data, bank accounts or land contracts repeatedly requested with the same information required for successive interim reports or for interim and final reports);
- data already included in the CAP application or submitted to PAs that needs to be sent to national entities for various purposes not related to the CAP (e.g. recording in databases and registers, certification processes, statistics);
- data needed for CAP reporting that have already been provided to national authorities (e.g. for investments, building permits); and
- compliance with national rules (e.g. data regarding livestock are frequently shared with sanitary, veterinary, and food safety agencies; land use and financial information are requested by tax offices and ministries).

115 Source: interviews with farmers.
116 Source: interviews with farmers.

Table 10. Multiple reporting of the same information: examples from data collection

Multiple reporting of the same information – examples	Sources
Investments: › Same information requested for interim and final reports (LT). › Information requested for reporting is already available to authorities (PT).	Interviews with MAs, PAs and Member State stakeholders
Information already sent to the MA/PA was also sent to statistical offices (CZ, HU, SK). AECC and integrated production schemes need to be reported on separate forms, which is unnecessary (SI). Data recorded in the farm management diary, for instance related to land use, livestock, production, income and farm workers have to be shared with multiple Ministries and State agencies, sometimes more than once (HU).	Interviews with farmers
Weekly reporting of delivered grapes and laboratory tests required 'for each document' (BG). Harvest declaration to be submitted, entering data one by one, to two different authorities (i.e. the vineyard registry of the regional government and the authority competent for the denomination of origin) (ES).	Survey of wine growers/ producers

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

Limited or inefficient use of digital tools

According to the TC, farmers record data mainly manually, with only a few respondents using management software/applications. Automatic recording is used rarely, as evidenced by the fact that only a small percentage (1-4%) of farmers indicate that the use of management software or sensors facilitates reporting to the authorities. The exception is age and expertise, as the use of software or automatic recording increases the younger and the more trained the farmer is [117].

Interviews with farmers and surveys of wine growers and producers provided some examples of issues related to recording and reporting tools and systems. Evidence shows that the collection and submission of information is sometimes more burdensome due to manual recording, not-user-friendly platforms or non-integrated recording and reporting systems, which mirrors similar issues put forward by MAs, PAs and Member State stakeholders.

Table 11. Issues with digitalisation: examples from data collection

Digitalisation in recording and reporting – examples	Sources
Recording of animals and relative fluctuations (deaths, births), as well as the medicines administered to them, continues to be a manual process and it is the most time-consuming task (EL). Data from field record books to be recorded in the PA register is not-mobile friendly and impractical for farmers (EE). A farmer automatically records data through technological devices (e.g. milking robot, tractors) but reporting must be done in different forms and requires manual additional work (LT). The online version of the farm management diary (a register that can be filled in either on paper or online) was considered burdensome for the amount of information requested. However, farmers choosing the paper version instead had to double the work as they were requested to upload data in their electronic application (HU). Poor digitalisation and interoperability of information systems (BE-FL, DE, HR, IT, CY, PT, SK).	Interviews with farmers Interviews with MAs, PAs and other CSP stakeholders
Repeated customs declarations. Need for interoperability between national (e.g. customs, welfare, taxes) and CAP portals in order for farmers to upload all relevant information only once.	Survey of wine growers/ producers

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

117 European Commission's analysis of TC data.

Box 8. Recording for own purpose ('business as usual')

While most recording is done because of legal obligations (administrative burden), farmers record data on a voluntary basis for farm management purposes. 25% of farmers participating in interviews indicated this [118]. These farmers claimed they would still record certain data (i.e. even if they were not obliged to) because they consider it useful to monitor their farm. This is the case of financial information or environmental data (e.g. quantity and quality of water, soil analysis, use of pesticides and fertilisers).

Complexity arises when what is done as part of the ordinary farm management work is subject to additional recording and reporting requirements that farmers consider time-consuming, excessive or repetitive (10% of these farmers consider this additional share of work an unnecessary burden). Most farmers would record some of the mandatory information but not all of it. Other would collect only basic information or, conversely, all mandatory data. Finally, few farmers specified they record different or additional data (e.g. on weather or carbon emissions).

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

In conclusion, both the TC and other sources from this study confirm that farmers record and report information particularly on production yields and prices, fertilisers, pesticides, soil as well as information on aspects related to the CAP requirements (GAECs), interventions and costs incurred. Furthermore, all sources stress the burden of manual recording and reporting processes and the need for further digitalisation. The multiple recording and reporting of the same data is not such a critical cause of burden as indicated in the TC, and farmers are used to recording information for their own management purposes. The burden arises due to requests for information outside the CAP or to additional CAP requirements.

Controls and on-site inspections

Box 9. Controls and on-site inspections: key findings

Summary of findings:

The TC and interviews with farmers consistently show that more than two third of respondents received at least one inspection in the last three years.

Not all of the interviewed farmers mentioned concerns related to inspections. For those who did, the most burdensome aspects include the frequency and redundancy of controls, the lack of flexibility and proportionality or the strictness of controls, the time-consuming character of controls and issues with the attitude or the competence of inspectors.

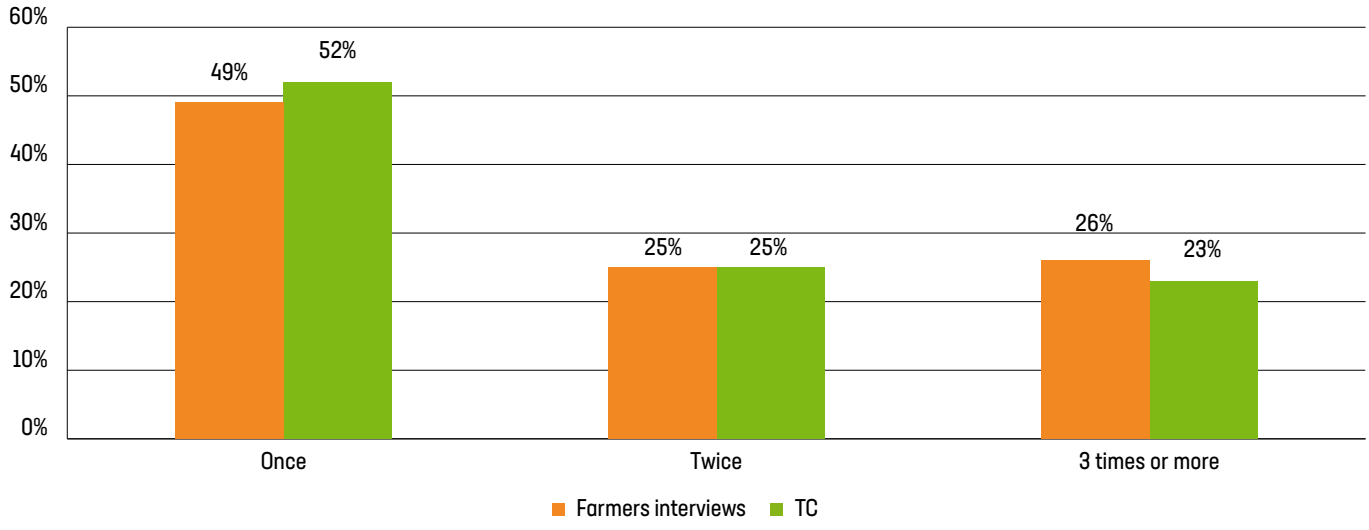
Controls are reportedly very burdensome for POs.

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

According to the TC, 69% of farmers have received at least one on-site inspection in the last three years (with great variations among Member States, from 56% in EL to 96% in EE and BE-FL). Larger farms, mixed farms and certified farms are more subject to controls, showing higher percentages of multiple inspections (three or more) and lower percentages of no inspections compared to smaller farms, livestock or crop farms and non-certified farms [119].

Interviews with farmers confirm this finding, as more than two-third of interviewed farmers (72%) claimed having received inspections in the last three years. During in-depth interviews, farmers referred to all types of controls, including those performed by national or local authorities outside the legal framework of CAP. Controllers include Ministries, veterinary services, bodies responsible for organic certification, labour inspectors, water authorities and others.

Figure 6. Number of times farmers have undergone inspections in the last three years



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmers interviews' data, N=147 (excluding farmers who did not have inspections and non-quantifiable responses) and TC data, N=18 332 (no. of farmers who declared to have been inspected)

118 Source: interviews with farmers.
119 European Commission's analysis of TC data.

Among the 38 farmers mentioning more than three inspections, some reported up to seven controls, sometimes within a short period (a few months or one year), performed by different bodies and partly or totally checking the same elements.

One-third of the interviewees explicitly mentioned and specified concerns with on-site inspections. A slightly higher share (39%) did not indicate any or explicitly claimed not having any concerns related to controls [120]. The remaining farmers (28%) have not been inspected in recent years.

Survey findings offer insights into the views of other CAP beneficiaries regarding controls and inspections. Inspections are not the primary concern for LAGs (34% claim 'not burdensome') and not yet a concern for EIP OGs ('not applicable' for most of them). On the contrary, POs considered this procedural step as the most burdensome both as a general average (they rated it 2.21 on a scale from 1 to 3) and concerning all four most mentioned interventions (e.g. rated 2.33 for 'investments, research and innovative production methods'). Wine growers and producers considered controls and inspections less burdensome than other steps in relation to sectoral interventions but slightly more burdensome for CAP in general [121].

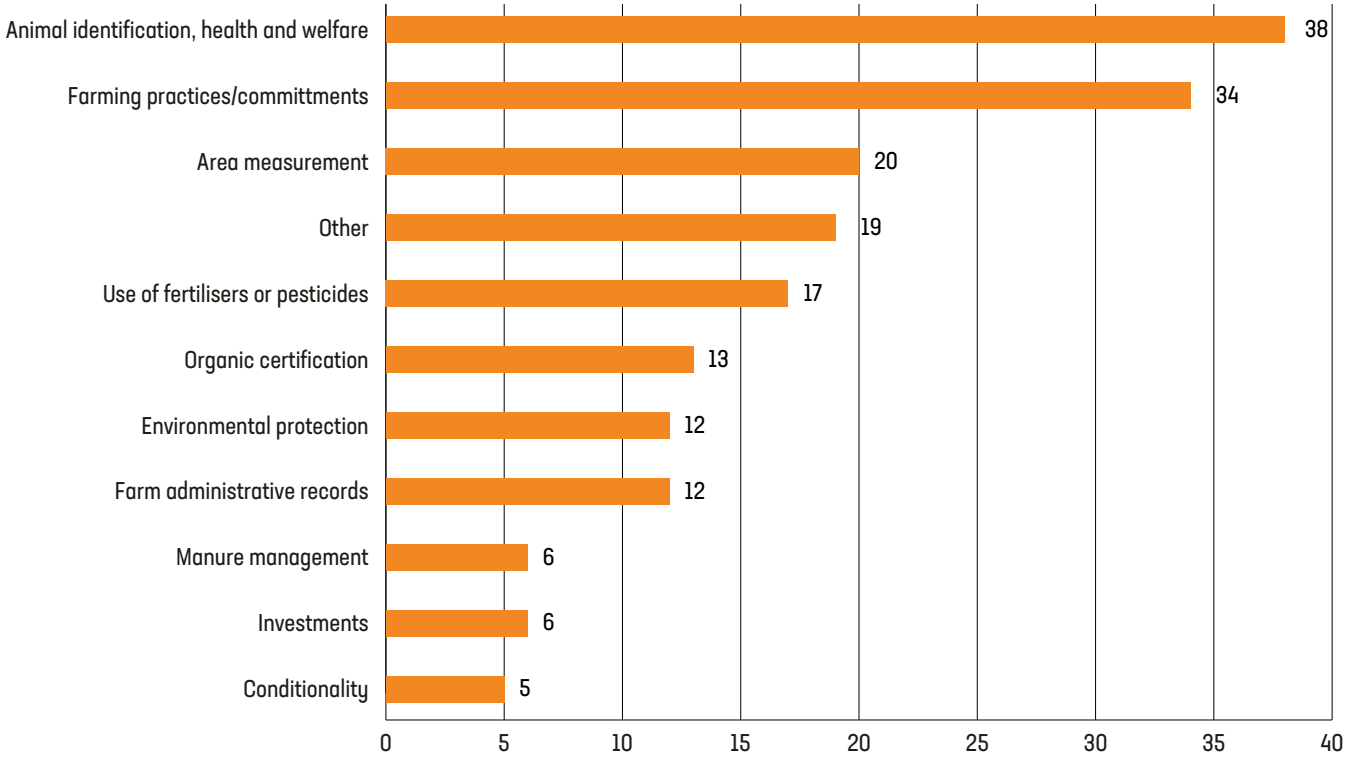
Interviews with MAs, PAs and Member State stakeholders shed light on the perceived higher complexity of controls and inspections for conditionality (GAECs in particular), other environmental rules outside the CAP and environment-related aid schemes (eco-schemes and area-based interventions) rather than investments.

Based on the responses of farmers, POs and MAs, PAs and Member State stakeholders, the main causes of burden for controls and inspections include:

- frequency and redundancy of controls;
- perceived strictness, lack of flexibility and proportionality;
- time-consuming tasks (preparation and attending controls) or inappropriate timing; and
- communication with inspectors.

Frequency and redundancy of controls. Frequent or repeated controls, with no coordination among the competent authorities, are a source of concern and frustration for beneficiaries, who feel over-controlled or mistrusted. Although information collected through interviews with farmers is not complete, an overview of what is controlled during inspections is shown below. Inspections regarding livestock are conducted not only by Paying Agencies but also by veterinary services. Area-based controls are predominantly CAP-related controls and entail, in many cases, verifying consistency between satellite images and the actual situation (wrong and unclear images were frequently mentioned by farmers).

Figure 7. Main objects of inspections



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmers interviews' data, N=138 (excluding farmers who did not have inspections and responses without this piece of information)

120 Among the farmers who did not raise any issue, several expressed positive opinions, not only acknowledging the need to carry out careful checks but also claiming that controls help clarify doubts and ensure doing things right. Positive examples emphasised the inspectors' politeness, reasonableness and availability to give explanations.
121 Source: surveys to CAP beneficiaries.

Table 12. Frequency of controls: examples from data collection

Frequency of controls, including duplications – examples	Source
Duplicated controls (e.g. same checks on the same CAP intervention by different inspectors; overlapping checks by different agencies) (BE-FL, EE, IT, MT, SE).	Interviews with farmers
Multiple inspections from several authorities with overlapping checks (ES, FR, PL).	Survey of POs
High number of controls, particularly when beneficiaries apply for many interventions (BE-WA, DE, ES, PL, SI). Multiplication of audits carried out by several EU and national authorities has made controls more detailed and reduced tolerance (AT, DK, ES, HU, LV, SE).	Interviews with MAs, PAs and Member State stakeholders

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

Time consuming tasks related to controls or inappropriate timing of controls

Around 40 farmers (almost 40% of those who expressed concerns with controls) [122] described inspections as time-consuming, stressful and even annoying experiences. Inspections required accurate preparation (for announced inspections, consisting of paperwork, review of records or collection of evidence based on the inspector's request) and/or lasted for a long time. This opinion is mirrored by evidence from POs and MAs, PAs and Member State stakeholders.

Some farmers found the timing of inspection inappropriate because they overlapped with crucial farming activities (e.g. harvesting) or were executed in the wrong period of the year) [123].

Table 13. Time consuming inspections: examples from data collection

Time consuming inspections – examples	Sources
Inspections are too detailed and take too much time (DE, EE, IE, IT, PL). Announced inspections are fine, but unannounced ones add significant stress and disrupt the work of the farm (BE-FL, NL).	Interviews with farmers
Controls are very burdensome because they require long preparation, and inspectors check all details and documents (e.g. also from previous years) (DE, ES, IT).	Survey of POs

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

Strictness, lack of flexibility or proportionality of inspections. Around 25% of interviewees expressed concern about controls [124], addressed a perceived lack of flexibility or proportionality of inspections (see some examples in the table below), the main reasons being: inspections focused on what farmers deemed to be minor aspects or irrelevant infringements; fear that small errors could lead to high or even excessive sanctions; strict application of rules without any flexibility, even in the case of unpredictable events.

122 Source: interviews with farmers.
123 E.g. looking for a crop that had already been replaced: farmers were in this case forced to leave residues of the previous crop as evidence.
124 Source: interviews with farmers.

Table 14. Lack of flexibility and proportionality: examples from data collection

Lack of flexibility and proportionality – examples	Sources
The duration and level of detail of controls are disproportionate compared to the amount of support (e.g. control took three days and the meadow was measured 0.2 ha smaller; four inspections for a EUR 20 000 diversification project) (EE, CZ, MT, SE, SK). Sanctions apply for minor violations or without consideration for unpredictable events (e.g. plants on biodiversity areas not grown due to drought) (AT, BE-FL, BG, LT, LU).	Interviews with farmers
On-site checks for small-scale projects are deemed burdensome for beneficiaries and inefficient for administration (CZ). Strictness of controls and lack of flexibility were associated with high error rates and sanctions that might be inflicted for minor deviations (AT, DE, HU, PL, SE, SK).	Interviews with MAs, PAs and Member State stakeholders

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

Unclear rules and communication with inspectors. Around 20% of farmers expressing concerns with inspections [125] said they could not understand the rules underpinning controls and did not know what to expect from the inspections, which reportedly created uncertainty and frustration. 30% of respondents complained about inspectors' attitude and perceived competence. Similar issues were reported by POs [126].

Table 15. Unclear rules and communication with inspectors: examples from data collection

Unclear rules and communication with inspectors – examples	Sources
Inspectors are not competent or well trained, difficult to communicate with and do not provide explanations (BG, FR, IE, IT, NL, SE). Beneficiaries feel not trusted or criminalised. Inspectors assume that they want to cheat (BG, BE-WA, ES, FR). Lack of feedback and clarifications from inspectors, unclear follow-up and unforeseen sanctions, delayed payments caused by control (BE-FL, BG, EE, FI, HR, IT, SE).	Interviews with farmers and survey to POs
Beneficiaries are receiving very long inspection reports and being fined without understanding the reason (BE-WA, BG).	Interviews with MAs, PAs and Member State stakeholders

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

In conclusion, the underlying factors that cause burden, during the controls and on-site inspections phase, include the high number of controls that take place on a very frequent basis and the time involved in preparing and conducting controls, which takes away time from production, as well as their timing in the year. Rigid controls may result in disproportionate sanctions that could be avoided if the farmer is given some flexibility for corrections. Finally, all of the above can be better or worse depending on the attitude and skills/experience of the inspector. Good communication stands out as a factor that facilitates the understanding and response of farmers to the required controls.

125 Source: interviews with farmers.
126 Source: survey to POs.

Box 10. Use of external help: key findings

The TC indicated that most beneficiaries use external help for activities linked to the CAP's application. Interviews with farmers indicated that they consider applying for CAP support as time-consuming or too difficult. Some individuals were unable to obtain information or comprehend the regulations. Others have poor digital skills.

Advisory services themselves mentioned issues when supporting beneficiaries. Challenges are related to understanding and interpreting the rules or too high demand form farmers, with cases of lack or insufficient qualification of advisors.

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

Beneficiaries often rely on external support to carry out CAP-related activities. Almost 60% of the farmers responding to the TC claim using external help for all CAP applications and an additional 19% for some applications. The use of external help for all CAP applications is slightly higher for livestock farms (63%), while it is below the average for very small farms of less than five ha (55%). The use of consultants decreases in farms with a higher number of workers and in farms led by younger and fully trained farmers [127].

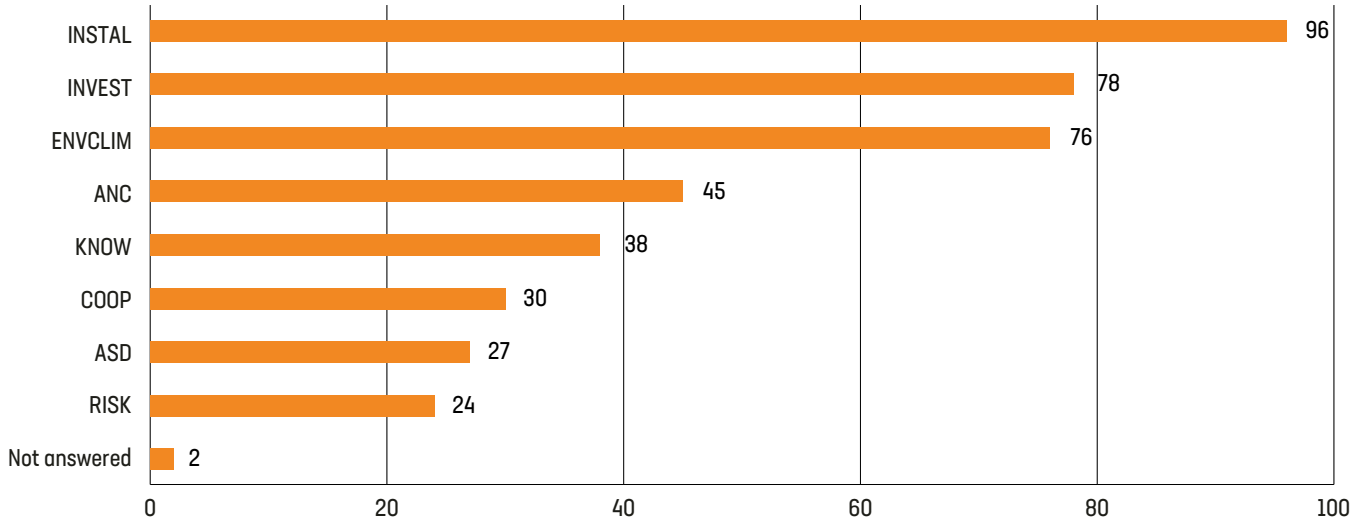
Other sources of information used for this study confirmed this extensive use of external help. The sample of interviewed farmers shows that almost three-quarters of them rely on advisory services (48% of them for all CAP applications and a further 25% for some applications) [128]. The limited size of the sample does not allow for capturing significant differences between farm sizes or other variables, except for the number of workers on the farm; almost 50% of farms with more than five workers do not use external help.

Interviews with MAs, PAs, and Member State stakeholders confirmed that beneficiaries strongly rely on advisory services (mentioned in AT, CZ, DE, MT, NL).

The survey of advisory services provided further insights into the use of external support related to CAP. Advise is predominantly provided to individual farmers, cited by more than 95% of respondents, followed by POs (34%) and LAGs (less than 15%). Concerning the most common farm size, 60% of advisors mentioned helping farms from 5 to 50 ha, 32% from 51 to 100 ha and 26% farms of less than five ha [129].

The aid schemes for which advisors most frequently provide assistance are direct payments and eco-schemes. As regards rural development, the INSTAL intervention precedes investments and area/animal-based interventions as the most commonly cited by advisors [130].

Figure 8. Types of rural development interventions for which beneficiaries most often seek advisory services' assistance [131]

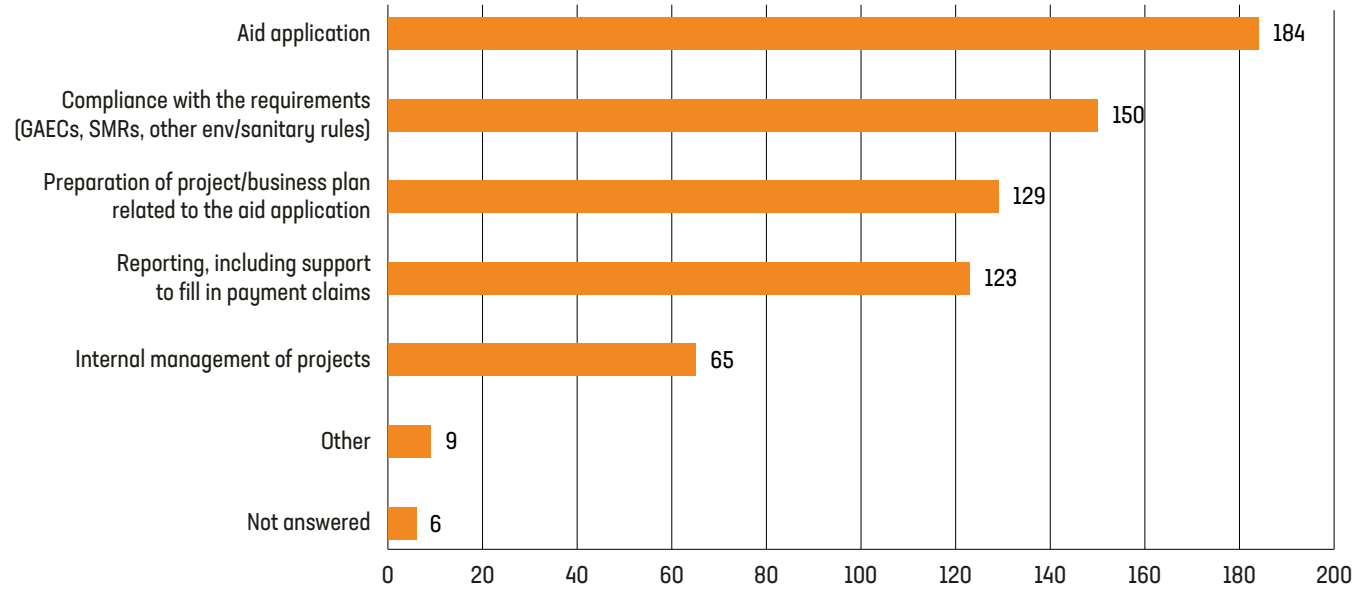


Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data, N=128 responses (multiple choice allowed)

In terms of tasks, beneficiaries most frequently seek support for filling in the application and for compliance with requirements. Preparation of projects and business plans are also commonly mentioned as well as support for reporting tasks.

127 European Commission's analysis of targeted consultation data.
128 Source: interviews with farmers.
129 Source: survey to advisory services.
130 Source: survey of advisory services.
131 The following definitions apply: INSTAL: setting-up of young farmers and new farmers and rural business start-up; INVEST: investments, including investments in irrigation; ENVCLIM: environmental, climate-related and other management commitments; ANC: natural or other area-specific constraints; KNOW: knowledge exchange and dissemination of information; COOP: cooperation; ASD: area-specific disadvantages resulting from certain mandatory requirements; RISK: risk management tools.

Figure 9. Types of activities beneficiaries typically seek support for



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

Interviews with farmers provided additional qualitative information on the use of external help (considering a sample of around 80 respondents who gave clear responses to this specific point). Advice was provided by private entities in more than 40% of cases: advisors, advisory companies and banks. Around 30% of these respondents used advisory services made available by public or private bodies at local, regional or national level [132]. Around 20% of farmers relied on farmer associations or cooperatives, mentioned in ES, FR, IT, NL and PT. Finally, other interviewees received assistance from family members, other farmers or neighbours [133].

Furthermore, interviews with farmers shed light on the reasons for relying on outside help. Most of these farmers emphasised that **filling in the application is time-consuming, complex or both** and that using external experts is simpler, does not interfere with their daily work on the farm (CAP applications are prepared in spring, a very busy period on the farm) and **minimises the risk of making mistakes** that would jeopardise accessing support from CAP. Another frequently mentioned (25% of farmers) element of complexity is related to the changes in the legislative framework. These farmers deemed it too complicated to engage in what they perceived as an endless process of **information searching and keeping up to date** [134]. 10% of farmers (half of whom are over 65 years old) flagged **issues with technology** (e.g. internet connection, use of information systems and online applications) as a reason for requiring external assistance.

Advisors themselves may have difficulty in providing consultancy. Examples from data collection range from the complexity of call for proposals, with unclear conditions and a large number of supporting documents (EL, IT) [135] to lack of advisors compared to the high demand (CZ, EE, IE) [136] and generalised distrust towards public advisory services, with farmers preferring to pay private consultants (SK) [137]. The topic of qualification for advisory services was touched upon by a representative of the EU CAP Network. For him, emphasis should be put on **ensuring that advisors' (and advisor trainers') competencies and curricula are up-to-date and suited to the new challenges.** Besides formal education and technical training, communication and digital skills are also important. In this sense, the support provided by 2023-2027 CAP to the '**back-office**' instrument has the potential to address the bottlenecks of AKIS and enhance qualitative advice to beneficiaries [138].

132 Among these, 10 Austrian farmers used the chambers of agriculture, whose skilled staff and efficient services were appreciated by all respondents (but one).
133 Source: interviews with farmers.
134 Examples from interviews with MAs, PAs and Member State stakeholders (IE) and from survey of advisory services confirmed that this aspect can be challenging for advisors themselves.
135 Source: survey of advisory services.
136 Source: interviews with MAs, PAs and Member State stakeholders. In Ireland, advisors face very high demand for assessing and scoring farms within the result-based ACRES AECC scheme (this is reportedly one of the causes of delayed payments).
137 Source: interviews with MAs, PAs and Member State stakeholders.
138 Source: interview with EU CAP Network.

4.1.3.2. Burden associated with CAP-related requirements: conditionality and other environmental rules outside the CAP

Box 11. Key findings in relation to burden generated by CAP-related and non-CAP requirements

For 73% of **farmers responding to the TC**, GAECs are 'highly complex'. Other environmental and sanitary rules were considered slightly less complex ('high complexity' ranging from 57%, for animal welfare and animal health to 67% for pesticides). **Most farmers identified the main challenges in the difficulty of complying with these requirements.**

Unfailingly, interviewed farmers most frequently identified GAECs as the most challenging CAP requirements to comply with, with SMRs and other legal requirements posing fewer difficulties. GAEC 8 was perceived as the most challenging standard [139], followed by GAECs 6, 7 and 4, highlighting significant compliance difficulties in the area of soil management and in rules requiring leaving non-productive areas.

Notably, three of the respondents' most frequently mentioned GAEC standards have been revised in the targeted review of the CAP regulation ('simplification regulation') [140], i.e. GAECs 8, 6 and 7, thus already acknowledging some of farmers' concerns.

Respondents mentioned SMRs less frequently compared to GAEC requirements, possibly due to perceived lower compliance issues or lesser familiarity with these regulations.

Farmers most often mentioned SMR 2 (water) and SMR 8 (plant protection products), while SMRs 9, 10 and 11 on animal welfare showed varied mentions, and SMRs related to water (SMR 1) and food safety (SMRs 5 and 6) were cited less frequently.

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

This section explores issues related to conditionality and other environmental and sanitary requirements. It presents and compares data from the TC and interviews with farmers. More detailed information, including findings from interviews with farmers and interviews with MAs, PAs and Member State stakeholders, is reported in Annex IV.

It should be noted that the responses of TC respondents and interviewees do not take into account the amendments made through the 'simplification regulation' (see also the policy framework), which entered into force after the consultation and approximately at the same time as the interviews. Therefore, farmers expressed the difficulties they perceived or had experienced before the new rules.

The TC revealed that complying with GAECs is perceived as highly complex by over 70% of farmers. In particular:

- For more than 40% of respondents, GAECs 5 (tillage management), 6 (soil cover) and 8 (non-productive features and areas) present the most 'difficult requirements'.
- 'Rules are not clear' above all in relation to GAEC 8, 5, 6 and 4 (buffer strips) for 20% to 25% of respondents [141].

The TC also shed light on the perceived complexity of environmental and sanitary requirements outside the CAP:

- Rules on 'plant health and pesticides', 'emission of air pollutants', 'Natura 2000' and 'nitrates' were rated as 'highly complex' by around 65% of farmers who responded.
- In relation to the nature of difficulties, 41% of respondents found 'difficult requirements' in 'rules on Nitrates' and 35% in 'rules on water'. For both these areas and for 'rules on emission of air pollutants', more than 20% said that 'rules are not clear' [142].

Furthermore, TC respondents were asked to explain the specific challenges encountered with GAECs and other requirements (open question) [143]. The figure below illustrates the main reasons for complexity based on the responses provided by 41.5% of the total TC population.

139 GAEC 8 was considered among the most difficult GAECs, by both TC and interview respondents, despite the derogation allowed for 2023 and the simplification of 2024. This can be due to the fact that farmers selected 'the most burdensome' requirements based on their knowledge and their perception about the nature of requirements. However, interviews with MAs, PAs and Member State stakeholders reported cases of full implementation of GAEC 8 (e.g. CZ, DK).

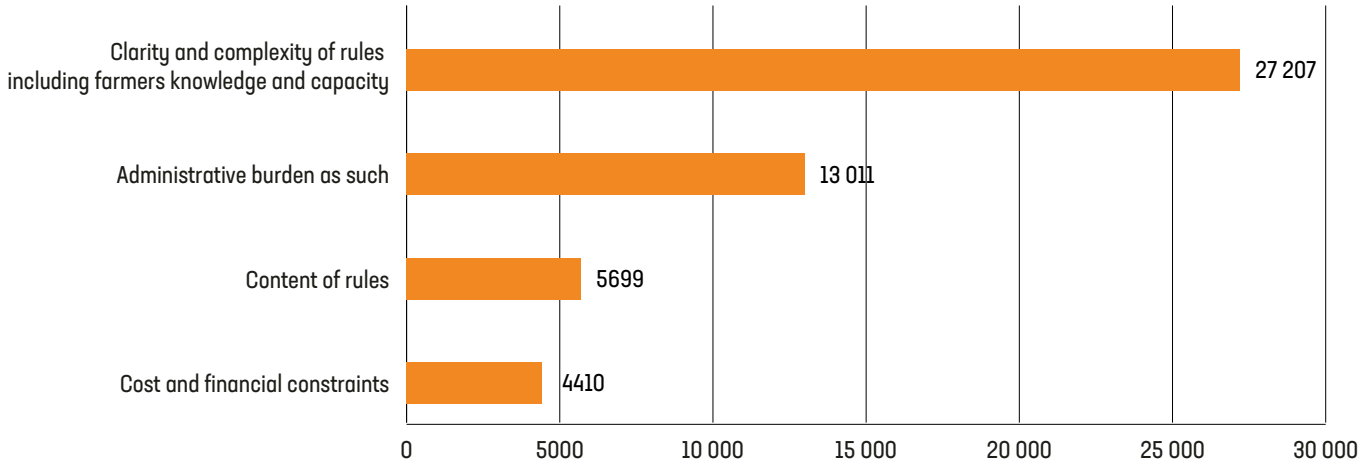
140 Commission Regulation (EU) 2024/1468 of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendment of the CAP Strategic Plans, review of the CAP Strategic Plans,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

141 European Commission's analysis of TC data.

142 European Commission's analysis of TC data.

143 Q10 – Could you please specify the nature of the difficulties you have when applying the requirements set under the GAEC or other environmental and sanitary requirements?

Figure 10. Distribution of TC responses related to difficulties farmers encounter when applying requirements



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=11 171 respondents, multiple choices allowed)

Some examples of answers belonging to **'Clarity and complexity of rules'** include "lack of clarity from the entities submitting the applications and from the indications provided by the paying entities", "the complexity of the rules and the multitude of obligations to be complied with are overwhelming. One can no longer see clearly what one applies for", "the texts are not clear, and for some, the standards contradict each other" and "too much regulation, we need to stop banning and instead train people in good practices".

Some examples of answers belonging to **'Administrative burden as such'** can be given, such as "every type of agricultural activity can potentially be considered a threat and harmful to the environment", "eco-regimes cannot be applied in my area, due to the type of soil and drought. Moreover, phytosanitary products are banned without proposing a viable alternative (for the green mosquito, for example)" and "not being able to plough until a certain date, for example, for forage crops, having to mandatorily rotate crops, not being able to burn crop residues".

Some examples of answers belonging to **'Content of rules'**: "every type of agricultural activity can potentially be considered a threat and harmful to the environment", "despite 90% drift-reducing nozzles and watercourse setbacks, the target values (in residue controls) are apparently not being met! What can you do then?", "it is impossible to maintain permanent pastures without cleaning work (brush clearing). In the Natura2000 network, this can only be done every four years, which leads to abandoned lands" and "restriction of ploughing on heavy soils under GAEC 6 is problematic".

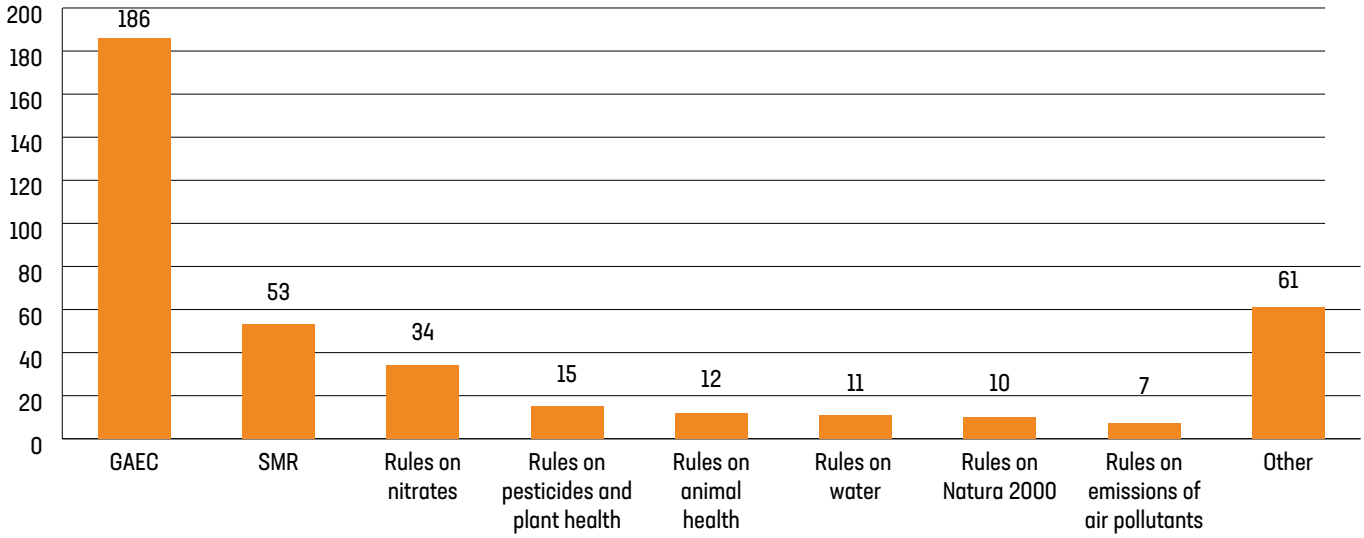
Some examples of answers belonging to **'Cost and financial constraints'**: "very high investments are necessary, for example, for slurry application", "a clear economic problem with the increase in costs, which makes it difficult to compete with products from other nations" and "complying with all these requirements involves a much higher expenditure than the economic compensation provided by the CAP in return".

In conclusion, the difficulties faced by farmers in meeting GAECs' and other environmental and sanitary requirements suggest that key challenges are related to issues of rule clarity and complexity, the content of environmental rules, and administrative burden in general terms and financial constraints.

Crop farmers report challenges primarily related to rule clarity and complexity, while livestock and forestry farmers face notable administrative burdens. Smaller farms (under five hectares) experience heightened administrative and financial strain, while larger farms (over 100 hectares) report more issues regarding rule clarity and content. Younger farmers under 30 years of age find environmental rules particularly challenging but report fewer issues with rule clarity, while older farmers, especially those over 65, struggle with complex rules and administrative tasks. Interviews with farmers collected further data on conditionality and other requirements. During the interviews, respondents were asked to identify the three most challenging requirements to comply with. The figure below shows the frequency of concerns farmers have about different agricultural requirements. GAECs were mentioned by nearly half of the respondents. SMRs follow, suggesting some difficulties, but to a lesser extent. With respect to compliance with other legal requirements, rules related to nitrates [144] were mentioned 34 times, indicating concerns from over one in ten respondents. It should be noted that the combination of responses pointing to specific SMRs or, in general, to rules on 'nitrates', 'water', etc., suggests that the distance between the perceived complexity of CAP and non-CAP environmental standards is, to some extent, reduced.

144 Annex XIII of Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021.

Figure 11. Frequency of the CAP requirements mentioned as the most difficult to comply with

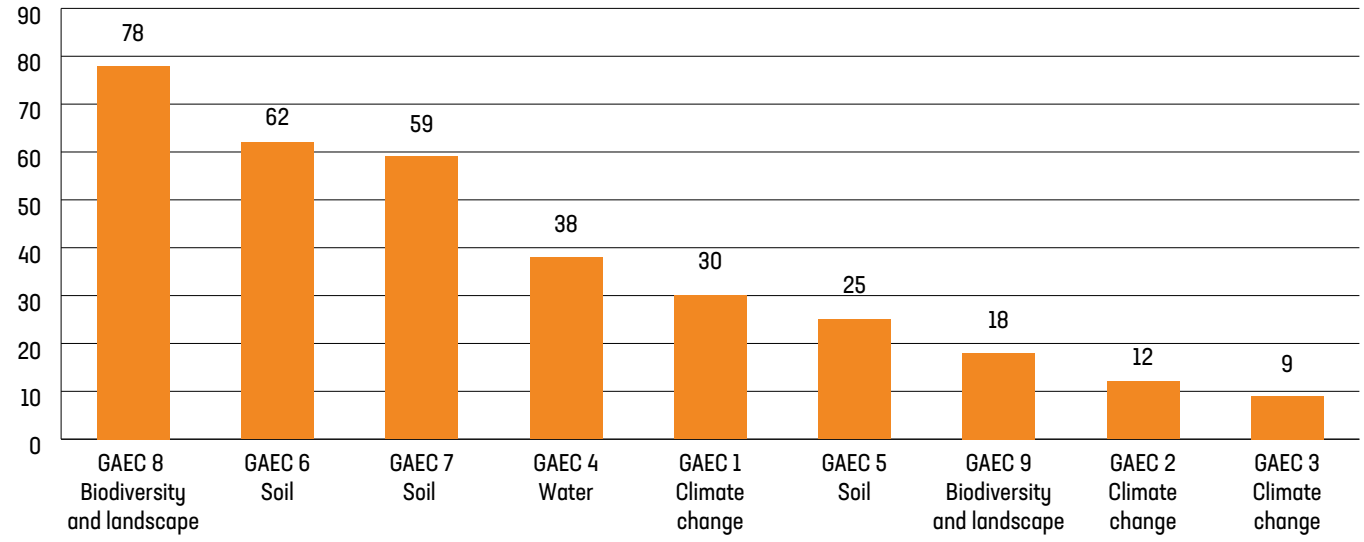


Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmers interviews' data, N=298

The figure below summarises the perception farmers have of the various GAECs, showing that GAEC 8, related to maintaining non-productive features and areas to enhance on-farm biodiversity, was perceived as the most challenging standard to comply with. The specific obligation to allocate arable land to non-productive areas has been removed from the GAEC 8 standard, but interviews captured farmers' perceptions when it was still in force.

GAEC 6 and 7, which relate to soil management, were also frequently mentioned. GAEC 6 was cited by respondents across 21 different Member States [145], with notable concern in Poland, where nine out of 15 respondents highlight it. GAEC 7 was mentioned by respondents from 19 Member States, with the highest number of mentions from Romania, where six out of ten respondents indicated difficulties with this GAEC. GAEC 4, which requires establishing buffer strips along watercourses, was mentioned by eight out of 12 farmers from the Netherlands, as did five out of ten respondents from Latvia.

Figure 12. Frequency of GAEC standards mentioned as the most difficult to comply with

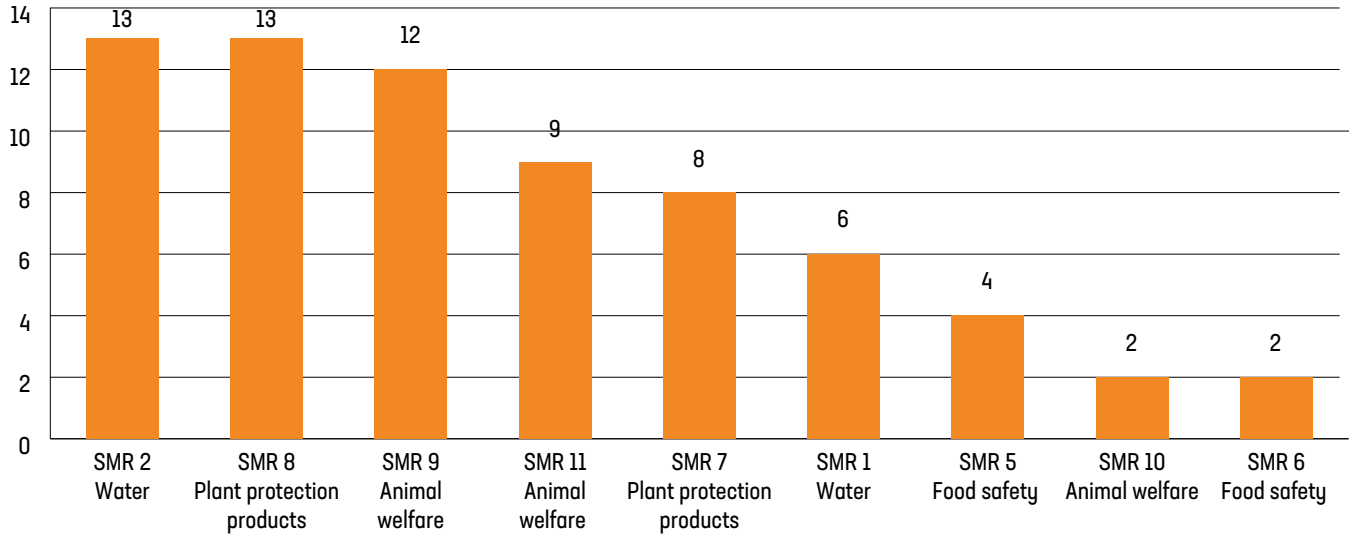


Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025) elaboration of farmers interviews' data, N=298 interviews

Compared to the GAEC requirements, the respondents mentioned SMRs less frequently. The lower number of mentions could be due to farmers perceiving fewer compliance issues, or it might be because these regulations are less well-known to them. Farmers frequently mentioned SMR 2 (water) and SMR 8 (plant protection products) 13 times each, while SMRs 9, 10 and 11 concerning animal welfare were cited 12, two and nine times respectively, indicating compliance challenges.

145 AT, BE-FL, BE-WA, BG, HR, CY, CZ, DK, FR, DE, GR, HU, IE, IT, LV, NL, PL, PT, RO, SK, ES.

Figure 13. Frequency of SMR mentioned as the most difficult to comply with



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmers interviews' data, N=298 interviews

Additionally, 33 respondents did not report specific requirements that are difficult to comply with. The reasons behind this are two-fold. First, respondents indicated that they did not perceive any particular issues with compliance. For instance, organic farmers reported applying all the requirements and even exceeding them. Second, some farmers who did not provide a specific answer mentioned that they are unaware of or lack sufficient knowledge of the legislative framework and the various GAEC standards or SMRs in place.

Overall, upon analysing the reasoning behind the concerns expressed for all GAECs and SMRs, five categories and 26 sub-categories of recurring aspects were identified.

1. The first category, **'clarity of the requirements',** covers issues related to the complexity, lack of clarity, overlap of requirements and difficulties stemming from connections to other sectoral regulations. Respondents often mentioned that the complexity and lack of clarity of legal requirements made compliance particularly challenging. Overlapping requirements and the need to navigate additional sector-specific regulations can potentially further complicate compliance efforts. This category received 27% of citations from farmers. It was the most important cause of burden in relation to GAECs 4, 1 and 9 and was also mentioned, in order of citations, by farmers referring to GAECs 8, 7, 6 and 5.

2. The second category addresses various aspects of **'farm management operations'** that present compliance challenges. These include the timing of operations, crop rotation, crop variety, weed and pest management, the impracticality of specific requirements, necessary equipment and other related issues. For example, farmers frequently struggle with timing their operations and managing crop variety due to the need to meet certain requirements This category received 33% of citations. It was the main cause of burden for GAECs 7, 6 and, together with the previous category, GAEC 1. Also cited in relation to GAECs 5, 8, 4 and 9.

3. Farmers frequently highlighted that local climate and soil conditions have an impact on their ability to comply with the requirements. This leads to the third category, **'contextual issues'**, which includes the local environmental factors that affect compliance. Sub-categories include local climate conditions, soil characteristics, geographical features, land use, farm size and layout, and other context-specific issues. This category received 16% of citations. It was the most relevant for GAEC 5 and important also for GAECs 7, 8, 4 and 1.

4. Fourth, the '**economic impact**' category classifies concerns related to the financial impact of compliance. This includes additional costs, loss of income, impact on yield and unproductive areas. Many respondents expressed concern about the economic burden of compliance, citing increased costs and declining income. This category received 21% of citations. It was the most frequently mentioned in relation to GAEC 8 and was also cited by farmers discussing GAECs 6, 7, 4, 5 and 1. The last category includes the challenges associated with **'administrative and organisational'** aspects of compliance. These cover the need for assistance, administrative burdens, dealing with multiple authorities, IT skills and knowledge required, and other related factors. Some farmers identified the administrative burden and the complexity of interactions with multiple authorities as challenges. This category had the lowest number of citations (3%) and was mentioned in relation to GAECs 4, 5 and 9.

The table below provides details and examples about the main reasons for complexity related to GAECs and the other requirements (SMRs) mentioned during the interviews with farmers, MAs, PAs and Member State stakeholders. It compares them with the main findings from the TC.

Table 16. Causes of burden related to compliance with GAECs, SMRs and other animal health/welfare rules

	Targeted consultation		Interviews with farmers Interviews with MAs, PAs and Member State stakeholders		
Requirement	**Cause of burden [146]**	**Member State most affected**	**Cause of burden**	**Detail farmers**	**Detail MA, PA, Member State stakeholders**
GAEC 1: Preservation of Permanent Grassland	Difficulties in meeting requirements (28%)	LT, EE, CY, ES, BE-FL	Permanent grasslands maintenance costs, loss of yield.	Additional costs associated with maintenance (RO). Loss of yield associated with permanent grasslands compared to 'renewed grasslands' (NL, RO). Uncertainty about the definition of permanent grasslands (e.g. does it include bushes?) and restoration methods (LT, LV).	Additional requirements at national level (prohibition on ploughing) created further burden (DE).
	Unclear rules (19%)	FI, LV, SE, IE, LT	Unclear definition of permanent grasslands.		
GAEC 2: Protection of Carbon-Rich Soils	Difficulties in meeting requirements (19%)	LT, LU, LV, CY, ES	Land use constraints, costly compliance, difficult mapping.	Mapping wetlands and peatlands (especially within arable fields) is difficult. Farmers face high costs and land constraints especially in small farms (DE, LV).	Delays in implementation, data issues (AT, BG, DE, SI).
	Unclear rules and definitions (13%)	LV, IE, MT, LT, FI			
GAEC 3: Ban on Burning Stubble	Relatively few reported difficulties (27%) Some report difficulties in meeting requirements (18%)	ES, EL, BG, IT, PT	Removal of traditional weed control method, additional transport and disposal costs.	Farmers used stubble burning for weed control, but now must dispose of it differently, adding costs. Some suggest targeted burning for problem areas.	

146 In brackets, % of respondents.

	Targeted consultation		Interviews with farmers Interviews with MAs, PAs and Member State stakeholders		
GAEC 4: Establishment of Buffer Strips	Difficulties in meeting requirements (34%)	BE-FL, NL, LU, LT, EE	Difficult requirements: reduced arable land, weed management issues, fertiliser/ pesticide restrictions.	Farmers need to leave buffer zones near water bodies, which reduces available land for cultivation. Managing weeds and restrictions on inputs make it harder (AT, BE, HU, NL, SI).	Concerns over land loss, buffer maintenance, and input restrictions. (HU, BE-WA). Further complexity due to national restrictions (LT, LV, SI).
	Unclear rules (21%)	LT, LV, FI, MT, BE-FL	Unclear definition of what counts as buffer strip.	Issues related to measurement of buffer strips, uncertainty about farming operations allowed, interpretation of the standard (BE, ES, FR, LT).	Unclear definition of 'polluted watercourse' (AT). Difficulty with map drawing (AT, HU, LU). Overlaps with national laws on water (DE).
GAEC 5: Tillage Management to Prevent Erosion	One of the GAECs that farmers most frequently found difficult to meet requirements (41%)	BE-WA, BG, PL, ES, DE	Impractical ploughing on sloped land. High costs for adapted machinery.	Farmers on slopes struggle with prescribed tillage rules, which may be unsafe (BG, CY, ES, HU). Adjusting farm operations is costly (IT, LT, RO). National rules and deadlines add complexity (AT, DK, FI).	Confirm issues related to sloped land and financial burden (AT, BE-WA, DE, BG, ES, HU, CY). Many plots classified at risk of erosion after new land classification, which forced farmers to adapt to new tillage techniques (BE-WA).
	Unclear rules (23%)	LT, FI, EE, LV, CZ			

	Targeted consultation		Interviews with farmers Interviews with MAs, PAs and Member State stakeholders		
GAEC 6: Soil Cover	One of the GAECs that farmers most frequently found difficult to meet requirements (43%)	PL, BE-WA, BG, BE-FL, LU	Lack of flexibility for different soil conditions and issues with required soil cover periods.	Lack of flexibility in soil cover requirements makes adaptation difficult in different climates and soil types. 'Sensitive periods' not always align with farming practices and weather (AT, CY, EL, NL, PL).	Soil cover adaptation difficulties. (AT, EL, MT, SK). Overly restrictive national rules for soil cover (exceptions added further complication) (AT). Excessively burdensome definition of 'adequate lie-back area' (IE).
	Unclear rules (23%)	MT, BE-FL, LT, FI, CZ			
GAEC 7: Crop Rotation	Difficult requirements (36%)	PL, BE-FL, LU, ES, SK	Difficult requirements for small farms and farms with arable crops.	Small farms may not have enough land to rotate crops effectively. Weather and context specific conditions add further challenges (BG, PL, RO). Further difficulties in relation to limited choice of crops (e.g. winter crops), with farmers feeling compelled to plant crops that are not optimal for them (BE-FL, NL).	Small farms face rotation difficulties; national rules add complexity (AT, DE, LV). Crop rotation is challenging in agricultural systems dominated by small farms (PT, SK), fragmented holdings (EL) or rented land (CY). Difficulty in understanding and implementing this standard (BE-FL, CY, FR, IE, PT, SI).
	Unclear rules (17%)	FI, SE, LT, PL, SK			

	Targeted consultation		Interviews with farmers Interviews with MAs, PAs and Member State stakeholders		
GAEC 8: Non-Productive Areas	One of the GAECs that farmers most frequently found difficult to meet requirements (41%)	BE-FL, PL, LU, LT, BE-WA	Reduces usable farmland, economic losses and additional national rules complicate compliance.	Farmers lose productive land due to biodiversity requirements and face additional costs to revert land to production and manage invasive species (several Member States).	Farmers report economic losses and challenges with additional rules. (BE, DE, LT, PL). Unclear definition and identification of non-productive areas (BE-WA, IE, RO). Overlaps with other nature conservation frameworks or with national rules on non-productive areas (SK). GAEC 8 is fully implemented in the country despite simplification at EU level (DK).
	Unclear rules (25%)	LT, SK, BE-WA, IE, FI, SE			
GAEC 9: Protection of Environmentally Sensitive Permanent Grassland **Other rules on Natura 2000**	Difficult to meet requirements (26%)	LT, LU, ES, SI, PL	Difficult requirements due to rigid operational timing. Lack of clarity also due to partial overlap with other Natura 2000 rules.	Excessive limitations to farming activities and strict seasonal timing make compliance difficult (BE-WA, FI, FR). Confusion over legal requirements, overlap with existing Natura 2000 rules (IE, BE-WA, LV, SI).	Confirm concerns about strict deadlines (e.g. for mowing) and excessive farming limitations (BG, DE, HU, SI).
	Unclear rules (18%)	LT, IE, EE, FI, MT			

	Targeted consultation		Interviews with farmers Interviews with MAs, PAs and Member State stakeholders		
SMR 1: Water Pollution Control **Rules on water**	Difficult to meet requirements (36%)	BE-FL, DE, LU, NL, PL CZ, IE, FI, LT, LV	Costly upgrades for compliance. Administrative burden (field records). Lack of clear rules and training.	Farmers must maintain records and meet strict rules for water pollution control, which is costly (e.g. leak-proof requirement for manure and urine storage) and complex (EE). Some report unclear guidelines and lack of training (ES, FR, HR, IT, PT, LV)	
	Unclear rules (23%)				
SMR 2: Nitrates Directive **Rules on Nitrates**	Difficult to meet requirements (43%)	BE-FL, DE, ES, NL, PL	Difficult requirements related to nitrogen restrictions.	Strict limits on nitrogen application affect diary sector limiting the number of animals. Nitrogen monitoring entails additional costs, e.g. for storage (IE). Restrictive spreading deadlines and weather-dependent application timing (IE, PL).	Confirm issues related to restrictions on nitrogen and rigid deadlines. Mention administrative burden related to nitrogen monitoring, fertilisers and farm operations recording (AT, BE-WA, IE, HU, LV, MT, RO).
	Unclear rules (22%) Seen as highly complex and involves strict nutrient management planning and costly manure storage and handling.	CZ, FI, IE, NL, PL			

	Targeted consultation		Interviews with farmers Interviews with MAs, PAs and Member State stakeholders		
SMR 7: Safe Use of Pesticides **SMR 8: Plant protection products** **Rules on pesticides and plant health**	Perceived as highly complex, frequent rule changes and heavy record-keeping requirements.	BE-WA, DE, ES, FR	Strict record-keeping. Technological limitations in monitoring. Issues with legislation on authorised plant protection products. Costs related to storage of pesticides and disposal of remnants.	Farmers must track pesticide use and follow training requirements. New technologies for monitoring are costly and difficult to implement (DE, FR). Farmers express concerns about too expensive or ineffective alternatives to phasing out plant protection products (CY, EL, HU, PT). Hiring specialised companies for pesticide disposal is costly and not justified (BG).	Confirm issues related to the ban on products without a viable alternative (BE-WA, CZ, HU) and burdensome recording reporting (BE-WA, CZ, HU, LT, SI).
SMR 9: Protection of Calves **Rules on animal health and welfare**	Seen as highly complex by 57% of farmers who provided an opinion. Seen as highly complex, with high costs for compliance (facilities, biosecurity), and heavy documentation requirements.	Animal health: DE, ES, IT, PL Animal welfare: CY, DE, ES, LV, PL	High costs for dehorning and infrastructure, as well as terrain-related challenges. Burdensome recording and reporting. Costly and difficult requirements (e.g. animal transport, medicines, ear tags).	Farmers need qualified personnel for dehorning, which is expensive (PT). Infrastructure limitations in mountainous areas make compliance even harder (BG). Rules on beak trimming and ear-tipping of goats are impractical and counterproductive for animal welfare (IT, FR). Additional costs and administrative burden associated to medicines for animals (ES, FR, PT).	Farmers perform numerous recording and reporting obligations. Repeated submission of information, tight deadlines, unclear rules add further burden (AT, BE-WA, FI, HU, SK).

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

4.1.3.3. An outline of the CAP's main areas of burden according to the targeted consultation and the perspective of MAs, PAs and Member State stakeholders

Box 12. Key findings in relation to areas of burden identified by TC respondents and MAs, PAs and Member State stakeholders

Some of the main areas of complexity identified by TC respondents are reflected in the perception of MAs, PAs and Member State stakeholders.

When asked to indicate CAP's main areas of burden, numerous respondents at Member State level (62 citations) identified the annual CAP application and direct payments as the most complex category. However, this result reflects the comprehensive nature of this procedure which involves the vast majority of farmers, includes applying for eco-schemes and implies, respecting conditionality. Consistent with TC results, several interviewees mentioned investments, eco-schemes and GAECs. The most burdensome procedural steps, for these main areas of burden are the preparatory steps related to eco-schemes, the application stage for investments and the controls as regards GAECs.

Besides identifying specific interventions or requirements, respondents showed concerns in relation to a number of 'horizontal issues' such as green architecture and environmental requirements and schemes in general terms, overall clarity, complexity or stability of rules, and digitalisation (e.g. lack of interoperability between IT systems, poor digital skills). **Most of these 'horizontal categories' also reflect concerns and causes of burden examined in the previous sections.**

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

As already mentioned in Sub-sections 4.1.3.1 and 4.1.3.2, the targeted consultation asked farmers to rate the **complexity of complying with different requirements and support schemes** [147]. In relation to some of the categories with the highest complexity, various interesting considerations can be made concerning the perceived complexity of different farm sizes and farming sectors. The following table shows the results of such TC respondents' ratings by **type of farming**.

Table 17. Requirements and support schemes most frequently rated by TC respondents as 'highly complex' by type of farming (% of responses, excluding responses with 'no opinion/I did not apply')

Top five most complex areas (according to farmers)	Arable crops (%)	All crops (%)	Livestock (%)	Forestry (%)	Wine (%)
Complying with CAP funding conditions for additional environmental/animal welfare improvements	81.2	79.8	78.4	77.1	76.3
Respecting minimum requirements of GAECs	75.5	73.6	71.6	67.5	69.8
Applying for investment aid	80.5	80.3	79.7	80.1	80.2
Complying with rules related to plant health, pesticides	70.5	69.0	64.7	63.1	66.4
Complying with rules related to nitrates	65.4	64.2	64.1	60.4	61.4

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=26 293 respondents to Q9, excluding 'no opinion/I did not apply')

Overall, 'complying with requirements for additional environmental/animal welfare improvements' (category includes eco-schemes and AECC) and respecting 'minimum requirements of GAECs' appear to be highly complex for a very large share of farmers specialising in crops, livestock and forestry and a relatively smaller proportion of wine farmers.

The other three areas of complexity (i.e. applying for investment aid, complying with rules related to plant health, pesticides and nitrates) are rated as 'highly complex' by a relatively lower share of TC respondents across most farming types, although 'applying for investment aid' is rated as highly complex by a larger proportion of livestock farmers and wine farmers, compared to farmers in the other sectors.

Perhaps not surprisingly, complying with rules related to plant health, pesticides and nitrates appears to be a source of high complexity for a relatively larger share of crop specialised farms than for other farm types.

Responses to the same TC question (Q09) were also analysed, distinguishing among **farm sizes**. The results reported in the following table clearly indicate that complexity increases with increasing farm size for all considered requirements/aid schemes.

147 Q09.

Table 18. Requirements and support schemes most frequently rated by TC respondents as 'highly complex' by farm size (% of responses, excluding 'responses with no opinion/I did not apply')

Top five most complex areas (according to farmers)	<5 ha (%)	5-50 ha (%)	51-100 ha (%)	>100 ha (%)
Complying with the CAP funding conditions for additional environmental/animal welfare improvements	64.9	75.4	80.9	83.5
Respecting minimum requirements of GAECs	54.3	67.9	75.1	78.4
Applying for investment aid	73.3	79.4	80.9	80.3
Complying with the rules related to plant health, pesticides	53.1	64.0	68.8	73.4
Complying with the rules related to nitrates	50.2	60.5	66.9	67.3

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=26 293 respondents to Q9, excluding 'no opinion/I did not apply'

Between 34% and 48% of very small farms below five hectares rate as 'highly complex all most burdensome requirements and aid schemes, while the share becomes progressively larger for farms of 5-50 ha and 50-100 ha, reaching 61% to 78% for farms over 100 ha. Larger farms (over 100 hectares) face heightened complexity, especially with environmental and welfare-related rules. MAs, PAs and Member State stakeholders identified a total of 548 areas of burden related to the CAP. The figure below shows the number of citations for each category. As mentioned in the analytical approach, some of them clearly refer to specific types of interventions or requirements, as detailed below.

CSP interventions (in order of frequency of citations)

- rural development: investment interventions
- eco-schemes
- rural development: other interventions (INSTAL, RISK, COOP, KNOW)
- rural development: area-based interventions (AECC, ANC, ASD)
- rural development: animal-based interventions (AECC including animal welfare)
- sectoral interventions
- organic farming

CAP and non-CAP requirements

- conditionality: GAECs
- other environmental rules arising from EU or national legislation (i.e. rules on nitrates, water, Natura 2000, emissions of air pollutants, plant health and pesticides, animal health, animal welfare)
- conditionality: SMRs

Responses of a more general or wide-ranging nature have been grouped in broader categories or 'horizontal issues' relevant to CAP implementation in general.

Direct payments and annual CAP application is a broad category covering references to the annual CAP application (also identified as 'CAP declaration') [148] and IACS tools. This category includes a few citations of specific schemes (coupled aid in BG and FI, CRISS in CY and IE, and the payment for small farmers in LV and SK).

Environmental requirements and schemes. Responses in this category did not identify specific issues that could be classified under other categories. Responses referred to environmental legislation in general terms, for instance, citing 'conditionality' with no specific reference to any GAECs or SMRs. Other responses mentioned the 'green architecture' pointing to the complex interplay between requirements and voluntary schemes.

Conditions attached to several CAP interventions combine citations of various requirements relevant to different types of interventions included in CSPs, in particular:

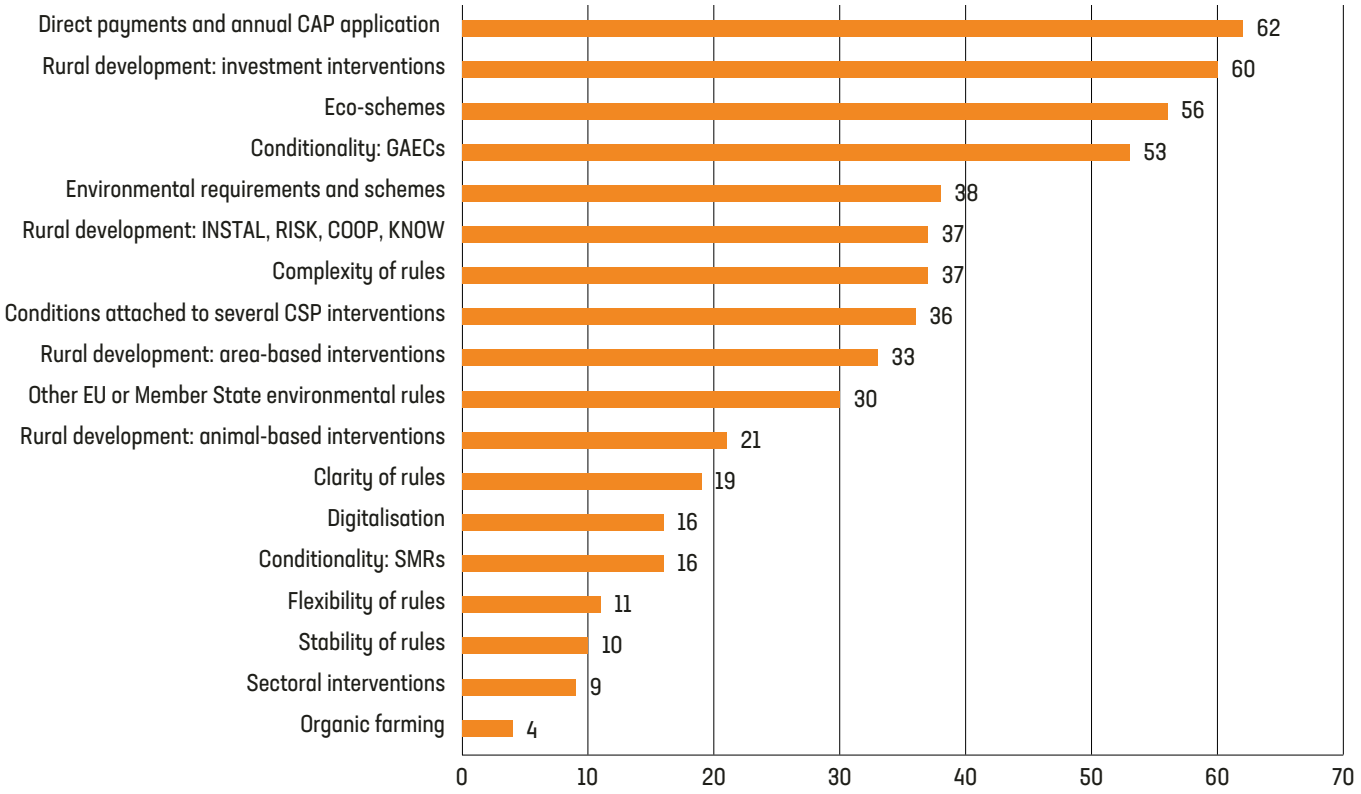
- public procurement laws (or, more frequently, procurement rules applied to private beneficiaries, cited in BG, DE, DK, EE, MT and PT);
- definitions: active farmers (cited by three Danish interviewees and in ES), young farmers (ES), arable land and permanent grasslands (DE);
- rules on publicity (DK and DE);
- social conditionality (LT and MT);
- state aid rules (LV and SK); and
- circumvention clause (DK and LT).

148 This is the most cited category because, as a Danish respondent put it, it applies to almost all farmers and therefore it generates the highest administrative volume for them. This means that the majority of interviewees pointed **to the procedure of submitting the annual application** rather than issues associated with direct payment schemes per se. Furthermore, for many farmers, the annual application includes eco-schemes and area-based rural development interventions.

Horizontal issues

- **Complexity of rules**, typically referring to the number of requirements and the onerousness of procedures.
- **Clarity of rules**, addressing difficulties in understanding the rules, providing support to beneficiaries, and issuing guidelines and specifications in a timely manner.
- **Digitalisation**, concerning poor digital infrastructures, lack of interoperability between IT systems and beneficiaries' lack of digital skills.
- **Flexibility of rules**, citing the rigid implementation of requirements and the lack of tolerance towards deadlines or minor errors.
- **Stability of rules**, mentioning frequent changes to or delayed adoptions of legislation and uncertainty regarding the applicable rules.

Figure 14. Distribution of the main areas of burden for farmers and other CAP beneficiaries



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA and Member State stakeholder interviews data, N=144 responses (multiple choices allowed, up to five)

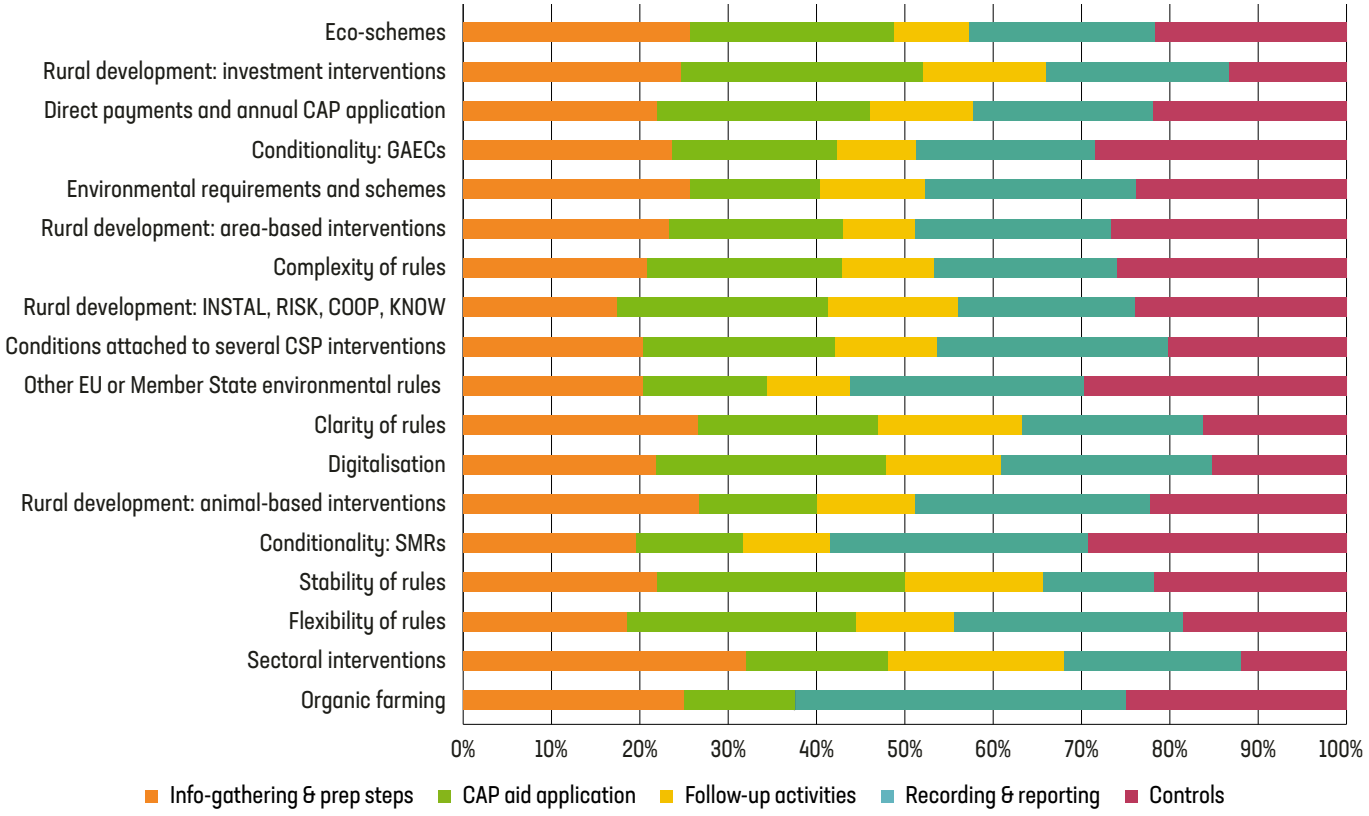
Interviewees were also invited to indicate the **most burdensome procedural steps associated with the selected areas of burden**. All procedural steps received several citations, with preparatory tasks as the most frequently mentioned and follow-up activities on application as the least cited.

The breakdown by category shows **that preparation steps were more frequently associated with sectoral interventions** (including the preparation of OPs), **animal-based interventions** (where many requirements and regulatory layers must be taken into account) and the horizontal category 'clarity of rules' that can be traced back to the challenge of acquiring information about new regulations.

Application is very burdensome for investments and non-IACS rural development interventions. The relatively frequent citations of horizontal categories such as digitalisation and stability of rules point at the use of online platforms and the perceived frequent changes of regulatory framework that interfere with aid applications.

Burdensome recording/reporting is relatively more associated with environmental requirements (e.g. organic farming, SMRs, animal-based interventions) as well as controls (conditionality and other environmental rules).

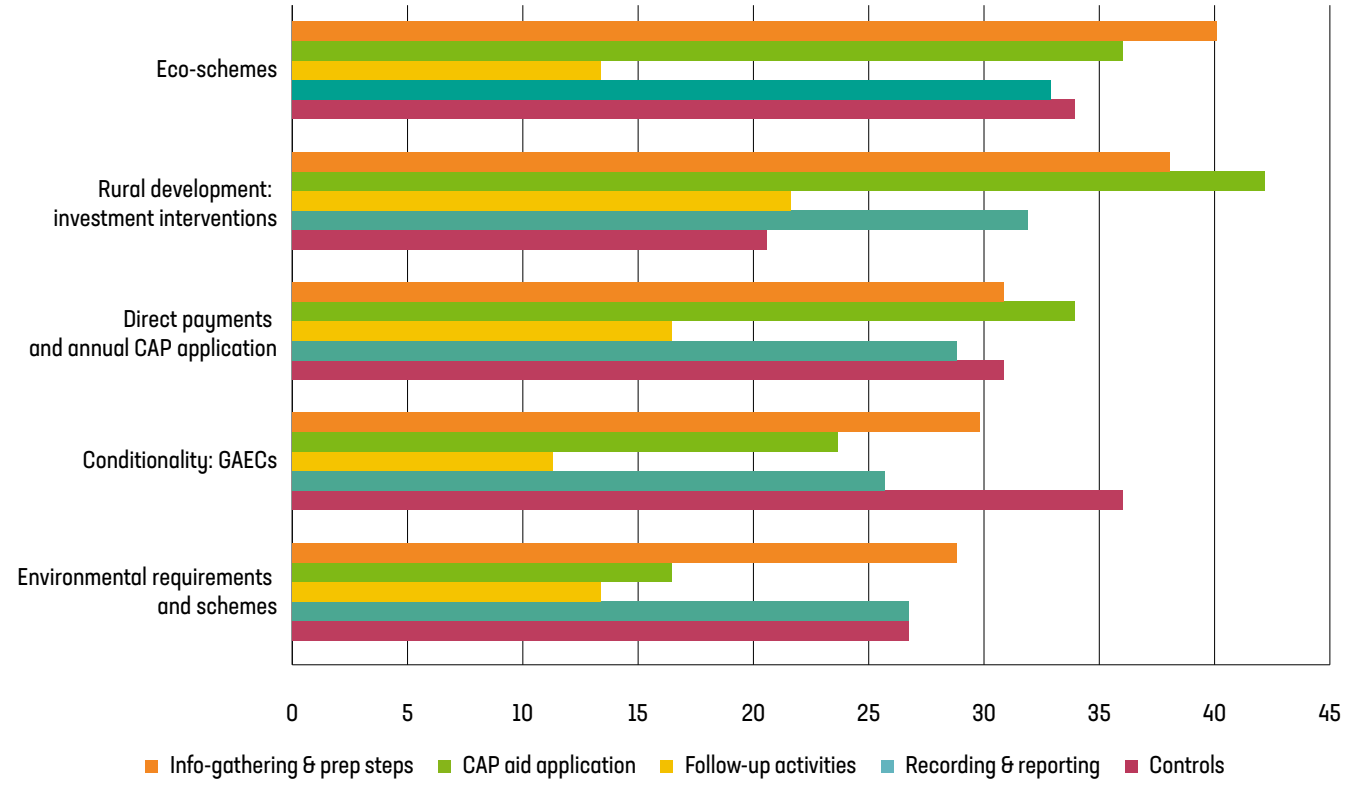
Figure 15. Proportion of procedural steps indicated as most burdensome, for each area of burden



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews data, N=144 responses

The following figure shows the procedural step breakdown for the five main areas of burden.

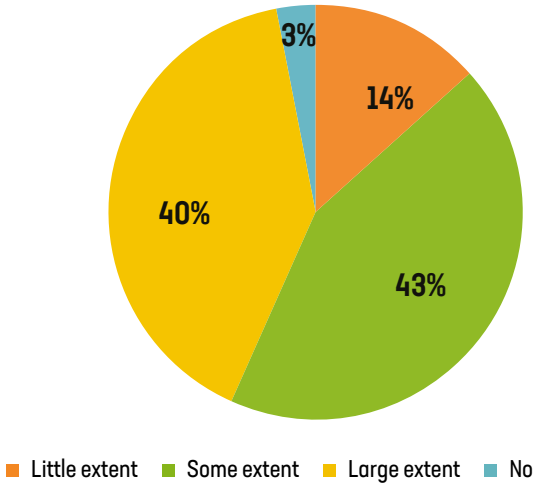
Figure 16. Distribution of procedural steps indicated as most burdensome for the top five areas of burden



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews data, N=144 responses

For 40% of respondents the complexity related to the main areas of burden is likely to cause errors, sanctions or withdrawal from commitments to a large extent. The two horizontal categories of 'stability of rules' (i.e. frequent changes in rules) and 'flexibility of rules' (i.e. the perceived rigidity in enforcing rules, for instance the respect of fixed deadlines or the sanctioning of reportedly small infringements) are most frequently associated with errors.

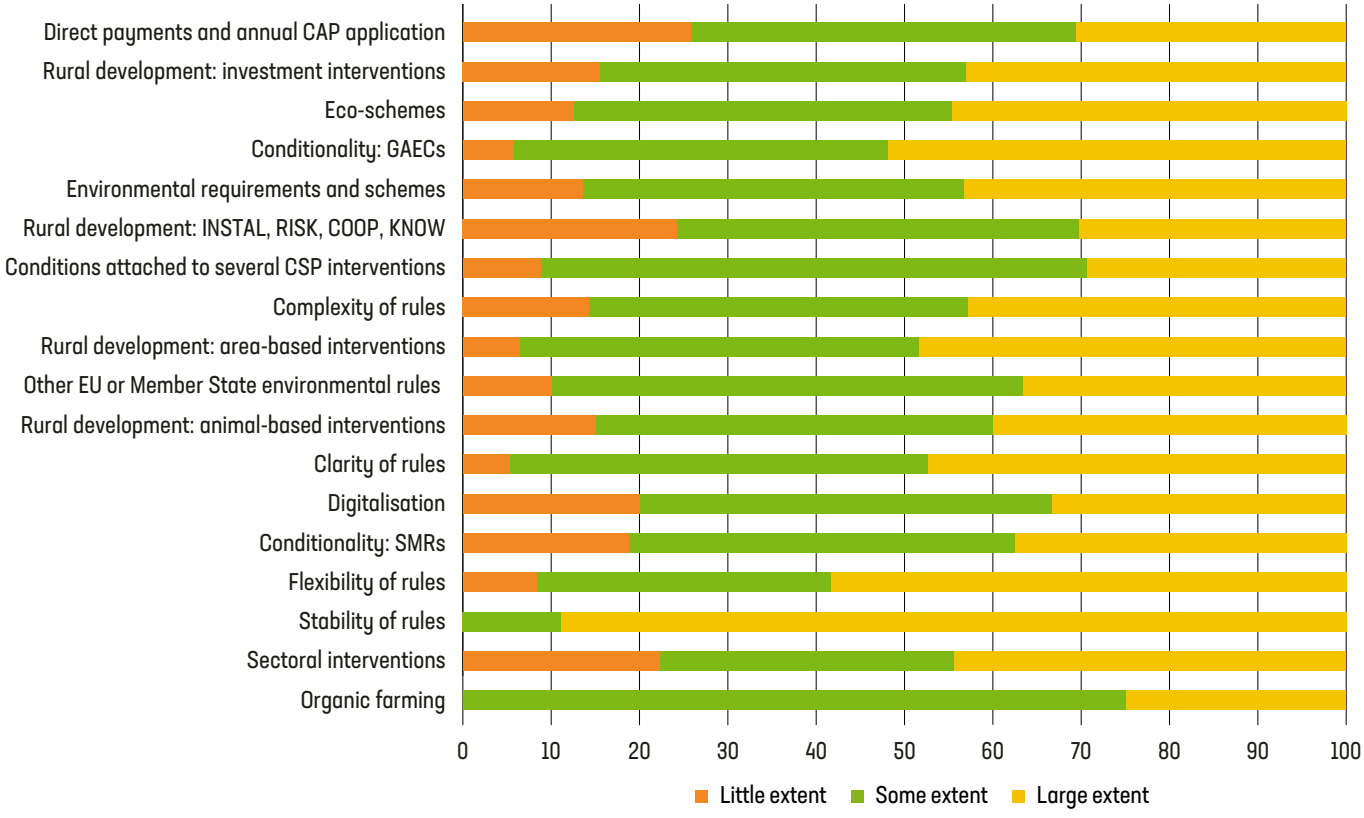
Figure 17. Extent to which the complexity, related to the areas of burden, is likely to cause errors, sanctions or beneficiaries withdrawing from commitments



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025) elaboration of MA/PA interviews data, N=144 responses

Examining the five main areas of burden, the complexity of GAECs, investments and eco-schemes is more prone to error, while for direct payments, the risk is reduced (beneficiaries have the opportunity to correct their application).

Figure 18. Distribution by area of burden of the extent to which the complexity is likely to cause errors, sanctions or beneficiaries withdrawing from commitments



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews data, N=144 responses

4.1.3.4. 2023-2027 CAP can be simplified

This part of the analysis focuses on possible **options to improve simplification and reduce administrative burden on farmers and other CAP beneficiaries**, based on suggestions directly provided by farmers in interviews and by other beneficiaries in the dedicated surveys.

Box 13. Key findings in relation to proposed simplification solutions

Several aspects of the current CAP are considered by almost half of the interviewed farmers as relatively easy to comply with. In particular, farmers find area-based and animal-based payments straightforward due to clear rules and transparent calculations, ensuring certainty in the support received. Online tools streamline the application process with pre-filled information and user-friendly interfaces, reducing administrative burden. Requirements for animal health and welfare, as well as rules on nitrates, manure and water management, are perceived as manageable, often aligning with farmers' existing practices and ethical standards.

Key areas for improvement to achieve further simplification and make administrative tasks more manageable include clarifying regulations, simplifying procedures for applications and for reporting, reducing redundant paperwork and duplication of information to be provided by farmers and other CAP beneficiaries, improving digital tools and leveraging technology, enhancing communication and providing better support and training. The suggested remedial actions are intended to make administrative tasks more manageable and efficient, ultimately benefiting both farmers and public authorities.

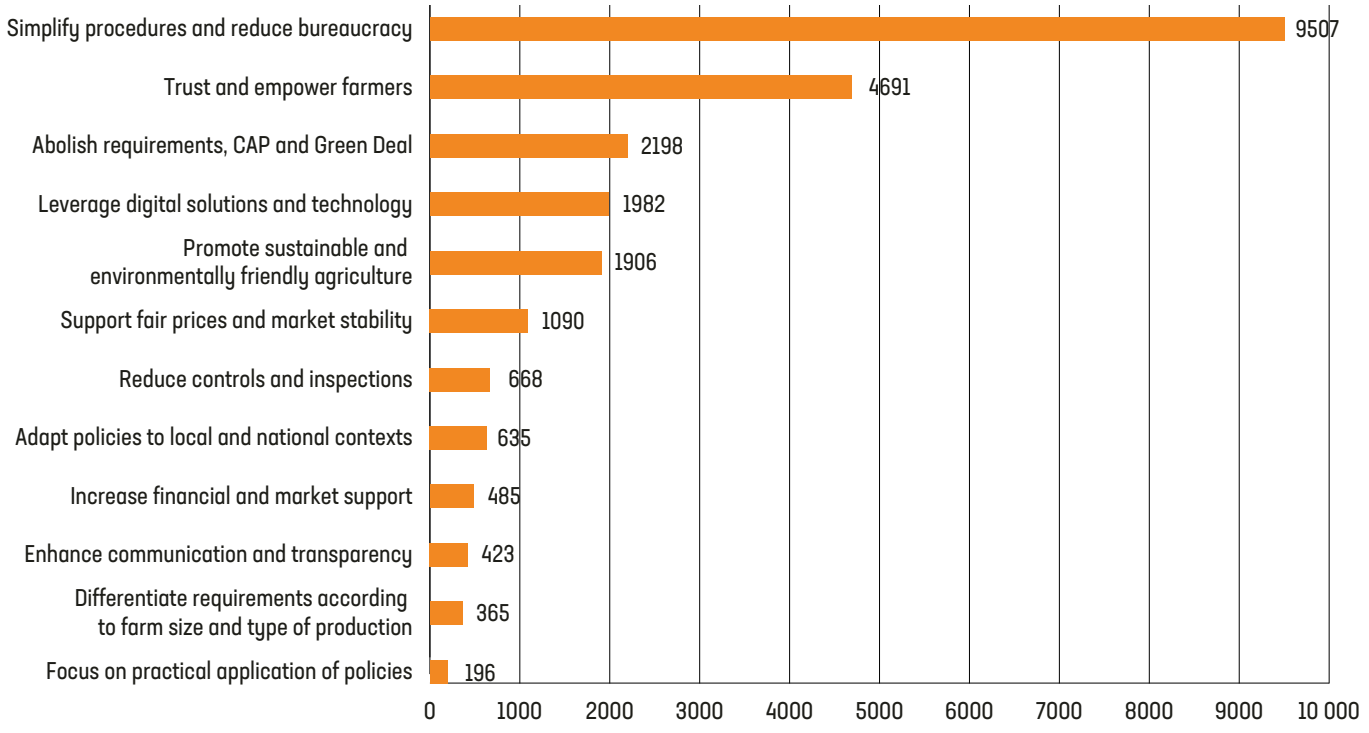
Key strategies to alleviate the burden of complying with CAP requirements focus on four key areas: flexibility tailored to local geographical and climate conditions, stable and clear rules, simplified regulatory frameworks, enhanced training and advisory support. Farmers stressed the need for regulations adaptable to soil type, climate and farm size, alongside clear communication of requirements to prevent unintentional non-compliance.

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

Among all other questions, the TC asked farmers for suggestions aimed at simplifying the burden imposed by procedures and rules [149]. This was an open-ended question that was answered by nearly half of TC respondents (47%). Among those who responded, 80.7% (i.e. just over 10 000 respondents) provided answers (including multiple suggestions for simplification) that could be classified into broad categories with the help of the AI tool.

The following graph shows the distribution of TC answers according to such categories.

Figure 19. Distribution of TC responses according to categories of simplification suggestions



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=10 196 responses)

149 Q20 of the targeted consultation: Do you have any suggestions for simplifying the burden imposed by procedures and rules linked to financial support under the common agricultural policy (CAP), or other EU rules for food and agriculture?

Most TC respondents to the question suggested that simplification could be improved by streamlining procedures and reducing bureaucracy.

Interestingly, a large number of respondents indicated 'trust and empowerment of farmers' as a way to improve simplification, advocating for a more trust-based approach allowing farmers and agri-food operators to leverage their knowledge and experience in shaping sustainable and efficient agricultural practices. Fostering collaboration between policymakers and practitioners would enable the creation of more effective laws and rules, thereby reducing bureaucracy.

A few TC responses were more extreme, advocating the removal or a significant reduction of EU agricultural policies and regulations, including the CAP as a whole and the EU Green Deal. A key message here is that farmers would like to have greater freedom to manage their farming activities. Eliminating or significantly reducing interventions and rules would allow them this freedom and also remove administrative obligations and the burdens they generate. These farmers seem to seek reassurance that agricultural products are brought to the market at a good price for producers rather than receiving financial support through the CAP, which some state may not even be sufficient to ensure they stay competitive. This type of response is also mirrored by the 1 090 farmer responses advocating for 'supporting fair prices and market stability'. Fair pricing mechanisms in agriculture would ensure economic viability for farmers while reducing their reliance on subsidies, thereby also alleviating much of the administrative burden.

A third group of suggestions that seem interesting to highlight are those asking for the 'promotion of sustainable and environmentally friendly agriculture' (1 906 respondents). Suggestions advocate for shifting subsidies towards ecologically responsible farms, promoting biodiversity, and supporting agro-ecological innovations such as no-till farming, precision technologies and diversified crop structures. Aligning financial incentives with environmental goals would also help reduce bureaucracy.

Although no particular differentiation is detected in responses across sectors, farm sizes and farmers' age groups, digital solutions appear to be more often mentioned as solutions for improving simplification by wine farmers and beekeepers, by smaller size farms and by younger farmers (under 39 years).

Most other types of simplification suggestions identified within the responses to the TC emerged from farmer interviews and surveys of other CAP beneficiaries, as described in the following parts of this section.

In interviews and surveys, both farmers and other CAP beneficiaries were asked to provide their views and suggestions on the 'possible actions (including practical examples) that could be taken by public authorities to simplify administrative tasks and therefore reduce the associated burden'. Both farmers and other CAP beneficiaries provided various suggestions for reducing the complexity of rules and duplication, streamlining processes and minimising unnecessary paperwork, which could significantly ease the administrative burden.

Information collected through both interviews and surveys points to several proposals for simplifying administrative tasks and reducing the burden for CAP beneficiaries. Proposed suggestions touch on various elements that could contribute to simplifying rules and requirements related, for instance, to the provision of information when applying for aid, reporting about requirements, submitting information for controls and payments, etc. The analysis therefore classifies CAP beneficiaries' suggestions for improvements according to six main areas:

1. Reduce the complexity of CAP legislation and requirements.
2. Simplify CAP applications.
3. Streamline recording and reporting tasks.
4. Reduce the burden related to inspections.
5. Improve communication between CAP authorities and beneficiaries.
6. Further develop digitalisation opportunities.

These areas, further described in the following paragraphs, are consistent with the categories identified based on responses to the TC. It should be noted though, that interviews with farmers also explored interventions and requirements that they considered less complex to implement. Therefore, the analysis first reports the findings about the elements that are considered to work well.

What works well?

About 125 interviewed farmers provided their views on interventions and requirements that are not too complex and shared information on the reasons behind such views.

Several farmers identified area-based and animal-based payments as relatively easy to comply with (respectively 40 and 36 farmers). Many of the responses suggest that the rules themselves are sufficiently clear. This, together with the limited scope of the conditions applicable to receiving the payments, appears to make it easy for many interviewed farmers to comply with the rules. In addition, some interviewees noted that it is easy for them to understand how payments are calculated, providing them with certainty and transparency about the support they receive.

In addition, when asked to indicate which tasks they had found most burdensome in the CAP application process, 47 farmers (15% of the interviewees) said that no task could be considered particularly complex and that the application system worked well.

One should not draw solid conclusions from a small sample of farmers, albeit coming from 18 Member States, applying for all types of aid schemes (including investments) and generally do not deviate from the overall sample as to the use of external help. However, the sample slightly overrepresented smaller farms under 5 hectares and underrepresented livestock farms. Notably, half of these interviewees applied for ANC and ASD schemes.

Many of the responses further suggest that the online tools used for the application process help reduce complexity and burden. Streamlined processes, pre-filled information, easy-to-navigate software and relative stability of the applicable rules across years are cited as some of the reasons why the application for area- and animal-based payments is easy to complete. Several farmers mentioned that they could simply copy information from previous years for a renewed application for CAP support, which simplifies this task. Nevertheless, some of the interviewees flagged that they considered the process burdensome when applying for support for the first time.

Requirements related to animal health and welfare were also frequently cited by interviewees (mentioned by 36 farmers) as requirements setting relatively low complexity for compliance. Some interviewees suggested that the rules on animal health and welfare are transparent and sufficiently clear, which facilitates compliance. Other interviewees also pointed out that advice from veterinarians or advisory services facilitates understanding compliance requirements. Two interviewees noted that requirements for reporting and documentation are limited, which reduces the burden. According to some respondents, the rules on animal health and welfare are mostly principles that farmers would adhere to, also in the absence of the CAP, to ensure the wellbeing of the livestock. Several farmers stressed their ethical obligation to treat animals well. Some of the comments suggest that these requirements sometimes define standards that fall short of the principles and standards that farmers apply in practice.

During the interviews, 31 farmers pointed out that requirements on nitrates, manure and water management are relatively easy for them to comply with. Five interviewees explicitly mentioned that, as organic producers, rules on fertilisation are straightforward to comply with. In relation to this point, some interviewees suggest that if manure from the farm livestock is used on the fields, requirements are easy to comply with due to the circular nature of the system. Some other interviewees further suggest that these requirements are easy to comply with as the rules were introduced several decades ago already, which means that complying with them has become common practice.

Some interviewees (13 farmers) further suggested that GAEC 7 on crop rotation is easy to comply with, notably because the rules are in the farmers' interest and are thus usually adhered to.

As these replies suggest, there is a commonality of factors that generally influence the perception of the complexity of requirements farmers need to comply with under the CAP. Notably, **farmers find requirements less complex when the applicable rules are clear, transparent, and stable over time**. Requirements are described as easy to comply with when the rules align or remain below the standards and practices farmers would follow even in the absence of CAP support. Finally, technological solutions, such as an easy-to-use application system that allows the re-use of or contains pre-filled information, are seen as one way for farmers to reduce the complexity of compliance.

Proposed solutions to reduce the complexity of CAP legislation and requirements

Proposed solutions to reduce the complexity of CAP legislation and requirements are particularly relevant to facilitate the preparation of CAP applications as well as to address the various challenges identified when meeting requirements. These proposed solutions can essentially be classified under three main themes: overall simplification of rules and processes, more stable and clearer rules, more flexible and adaptable rules. These are described in the following paragraphs.

Overall simplification of rules and processes

Around 25% of interviewed farmers provided suggestions for simplifying rules to ease administrative burden, calling for clearer guidelines and streamlined processes. Suggestions include reducing regulations, simplifying aid applications and tailoring requirements to smaller farms. Extending deadlines, automating notifications and reducing reporting frequency during busy periods were also proposed that could also alleviate pressure.

Farmers also highlighted the need to simplify CAP requirements, calling for fewer and more straightforward rules. Suggestions include reducing the total number of compliance requirements (e.g. to a maximum of five), for instance by introducing a flat-rate system for small and part-time farms to replace detailed reporting, by reducing the number of eco-schemes or integrating GAECs into eco-schemes to make them voluntary rather than compulsory. Other suggestions include the adoption of digital tools to help farmers track compliance requirements consolidating overlapping rules (e.g. green architecture elements), allowing joint on-site inspections for small farms and conducting fertiliser requirement checks at the farm (gate) level. Simplifying 'green architecture' rules, particularly eco-schemes and AECM, emerges as a priority, as their complexity creates significant bureaucratic burden.

Simplified cost options and consistent rules across government levels are also proposed to reduce reliance on costly external consultants. Among the other CAP beneficiaries, wine growers/producers, advisory services and LAGs also make clear reference to the need for harmonisation of rules across different administrative entities and Member States to eliminate redundancies and contradictions. According to advisory services, contradictions in requirements affect smaller size farms to a greater extent as they face disproportionately higher penalties relative to their size.

EIP Operational Groups report that the complexity of current CAP rules, especially in terms of VAT issues, pre-financing and legal compliance, creates significant difficulties. A clear recommendation emerging from the OGs is the introduction of simpler, more uniform guidelines that minimise discrepancies across regions. Harmonisation of national and EU policies and reduced bureaucratic overlap could alleviate these challenges.

Stability and clarity of rules

Frequent rule changes and complex documentation create stress, particularly for smaller farms. Frequent changes can also hinder long-term planning and investments. Suggestions to improve stability of rules include clear communication of existing derogations and exemptions from GAEC requirements and avoiding frequent changes by setting a minimum time interval (e.g. five years) before amending rules. In the previous sections, some examples were given about farmers' perceived instability of rules, which can include frequent changes to national guidelines, requirements and criteria for accessing support. The perceived instability of rules is a source of uncertainty for farmers, with potential effects on their planning. The Commission recognised the need to avoid frequent changes to CSPs and ensure stability in the support schemes for farmers. The proposal of 15 March 2024 indeed limits the application of the requirement to review and update their CSPs [150].

150 European Commission, Staff Working Document 'Simplification measures for farmers', accompanying the document Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendments to CAP Strategic Plans, review of CAP Strategic Plans and exemptions from controls and penalties. SWD(2024) 360 final, Brussels, 10.12.2024.

Interviewed farmers stressed the need for clear, accessible guidelines (e.g. avoid legal jargon) to ease understanding and therefore compliance. To improve clarity, farmers advocate for:

- A centralised 'one-stop-shop' platform with comprehensive, accessible regulations and cross-links for different farm types.
- Early information campaigns and training (at least a year before rule implementation) targeting both Paying Agencies and farmers to enhance understanding and planning.
- Annual brochures with clear, jargon-free guidelines in national languages.
- Detailed explanations accompanying sanctions, including guidance on correcting mistakes to prevent future issues.

Stability and clarity of rules are also advocated by other CAP beneficiaries (i.e. wine growers/producers). The solutions proposed for clearer rules aim to increase transparency and make compliance more manageable, especially for smaller farms, while reducing unintentional errors.

More flexible and adaptable rules

Farmers call for a more adaptable regulatory framework that accounts for diverse challenges such as climate, geography and market conditions. They seek practical and flexible rules that can respond to changing circumstances like extreme weather or local requirements (e.g. Natura 2000).

Key proposals include aligning compliance checks and reporting deadlines with the farming calendar, allowing flexibility during adverse conditions (e.g. waiving penalties for unploughed flooded fields), and adjusting crop rotation and landscape element requirements to practical needs. Subsidies and eligibility criteria should better reflect diverse farming practices and local conditions, with leniency for errors during the application stage.

Farmers and advisory services also emphasised the need for greater flexibility in CAP requirements to ease compliance. They suggested that commitments should adapt to local conditions like soil type, climate and farm size. Specific proposals to make compliance more practical and tailored to diverse farming contexts include:

- promoting intercropping as crop rotation/diversification;
- allowing flexibility in cover crop selection and management;
- introducing derogations for rented land and organic farmers;
- adjusting thresholds for small farms (e.g. raising the 10 ha threshold); and
- permitting derogations during extreme conditions or phyto-sanitary crises (e.g. controlled stubble burning).

Among the other CAP beneficiaries, wine growers/producers, POs in the fruit and vegetable sector and LAGs advocate for greater adaptability and practicality of rules. Wine growers/producers and POs highlight the need to revise the system to make rules more practical, more outcome-oriented (i.e. focusing on results rather than excessively detailed evidence requirements) and more grounded in farming realities. LAGs suggest introducing adaptable frameworks that allow adjustments during projects' lifecycles, avoiding lengthy bureaucratic approval processes.

Advisory services propose a simplification solution to implement a progressive penalty system based on farm size to make sanctions fairer for smallholders.

Proposed solutions to simplify CAP applications

Farmers' suggestions for simplifying aid applications are particularly relevant as the application is the procedural step that has proved to be most burdensome. Suggestions cover different elements, essentially focusing on:

- **Reducing the volume and complexity of required documentation** (especially to demonstrate eligibility).
- **Developing unified application systems**, for instance, single platforms for submitting applications across various CAP interventions with pre-filled forms to minimise repetitive entries.
- **Allowing broader timeframes for aid applications** e.g. time intervals rather than fixed deadlines, for application submission to reduce pressure on farmers especially at particular times of the year.
- **Allowing for tailored requirements** such as specific criteria for smaller farms to decrease the often disproportionate administrative burden they face.

All other CAP beneficiaries surveyed (wine growers/producers, POs, LAGs, advisory services and EIP OGs) also express the need for reducing the documentation required to submit aid applications and advocate for the use of pre-filled templates (i.e. reuse data from the previous years when no change has occurred). Advisory services highlight the advantage that unified online portals would bring, allowing the centralisation of all CAP-related applications and eliminating the need for repetitive data submission across different agencies. POs and EIP OGs advocate for better guidance documents explaining the available support and related requirements. LAGs also point to the need for enhanced training and guidance to better assist beneficiaries and OGs with better guidance documents and subsidised intermediary support for structuring proposals.

Further proposals to simplify the aid application process include introducing:

- sector-specific application forms (wine growers/producers);
- proportionality for small-scale projects such as lighter requirements and reduced documentation for projects under EUR 100 000 (LAGs); and
- auto-certification i.e. enable farmers to initially self-certify compliance followed by subsequent checks only when inconsistencies are flagged.

Proposed solutions to streamline recording and reporting tasks

Although recording and reporting has been found not to be as burdensome as the application procedural step, there are some important burdens to be addressed, especially in relation to multiple reporting. Around 15% of interviewed farmers recommended simplifying reporting and inspection processes. Key suggestions include the provision of clear guidelines, consolidating forms and stabilising systems to minimise frequent changes. Farmers proposed user-friendly applications that reduce paperwork, integrate with Payment Agencies' systems and automate checks to avoid delays.

Unified and centralised data submission systems, pre-filled forms and centralised cloud storage are suggested to eliminate redundant work (i.e. duplication) and streamline processes. Farmers also call for centralised eco-scheme databases, reduced record-keeping, shorter document retention periods and reduced reporting frequency and particularly during peak farming periods, to reduce interference with farming activities. Moreover, farmers believe that digital reporting and record-keeping, aiming to reduce manual and repetitive tasks, should be encouraged. The introduction of automated notifications for deadlines and updates would help farmers track compliance requirements.

The need for unified and centralised data submission systems (largely aiming at avoiding duplication of information) is widely expressed also by all surveyed CAP beneficiaries other than farmers. LAGs call for reduced reporting frequency focused on essential indicators with decreased documentation requirements and risk-based controls (i.e. based on project scale and risk). Wine growers/producers suggest introducing a tolerance for minor errors as a more lenient approach for insignificant deviations would reduce unnecessary corrective actions. POs propose greater flexibility in providing financial proofs, which could also be achieved through greater use of flat-rate or simplified cost options for specific activities. Finally, advisory services suggest shifting the focus from detailed input monitoring to output assessment, ensuring that recording and reporting efforts are concentrated on essential compliance metrics.

Proposed solutions to reduce burden related to inspections

Inspections are one of the procedural steps where around a third of farmers raised concerns. To address these, farmers advocate simplified procedures, advance notice, flexible scheduling and a supportive approach to employing inspectors experienced in agriculture. The proposed measures aim to reduce bureaucracy and allow farmers to focus on farming activities rather than on administrative tasks. In further detail, proposed solutions to reduce burden related to inspections can be summarised under the following areas, which address some of the specific burdens identified, notably, the frequency of inspections, the lack of flexibility and the need for better communication with inspectors:

- **Simplified inspection procedures**: provide advance notice for inspections and offer flexibility in scheduling them to align with farmers' availability.
- **Focus on support**: shift inspection focus towards technical advice and support rather than solely enforcement.
- **Knowledgeable inspectors**: ensure inspectors have adequate agricultural knowledge to perform fair evaluations.
- **Remote monitoring**: use remote sensing and digital data to reduce on-site inspections.

As a complement to farmers' proposed solutions, survey responses of advisory services confirm the need to streamline procedures to be achieved through simplification of inspection protocols, ensuring that they are aligned with guidance rules provided to farmers and reducing ambiguity in compliance expectations. Advisory services also advocate more targeted inspections through a reduction of the frequency of on-the-spot checks and targeting farms with a history of non-compliance. EIP OGs also propose to adopt risk-based inspection models focusing on high-risk areas, thus reducing unnecessary checks for compliant beneficiaries.

LAGs suggest leveraging digital systems to cross-check data so as to minimise redundant inspections, whereas wine growers/producers propose more extended use of virtual inspections and reserving physical checks only for specific cases. On the contrary, POs pointed out the inefficiency of remote inspections introduced during the COVID-19 pandemic and advocated a return to full in-person inspections. Finally, advisory services emphasise some limitations of satellite monitoring, especially for small-size fields, fallow land and rare crops, which would require combining satellite data with field-level checks when necessary.

Proposed solutions to improve communication between CAP authorities and beneficiaries

Communication has been identified as a factor that affects all procedural steps. Limited or poor communication exacerbates the identified burdens. Proposed solutions to improve communication between public authorities and CAP beneficiaries pertain to the following main areas:

- **Access to centralised information**: develop a 'one-stop-shop' platform for all CAP-related regulations and updates (see also previous section on 'Proposed solutions to reduce the complexity of CAP legislation and requirements').
- **Enhanced training**: organise regular training sessions, seminars and info days to keep farmers updated on regulations.
- **Direct support**: establish local assistance centres with knowledgeable staff for personalised guidance.
- **Feedback mechanisms**: involve farmers in consultations and trials of new processes to refine policies and tools based on their input.

About one-third of interviewed farmers suggest improving communication, training and support from public authorities, as well as enhancing feedback mechanisms. Farmers feel disconnected from institutions that set rules and desire clearer, timely and accessible information on regulations using simple language. Consistent messaging and comprehensive guidelines, FAQs and training sessions are proposed to reduce confusion.

Farmers in a number of countries, including RO, IT and ES, highlighted the need for personalised technical support through local assistance centres with knowledgeable staff rather than impersonal online or telephone helplines. A more collaborative approach with Paying Agencies and inspectors is also suggested, for instance by pairing inspections with guidance-focused interventions to support improvement rather than solely enforcing rules. Among the other CAP beneficiaries, wine growers and producers, POs, advisory services and EIP OGs likewise express the need for better targeted and real-time support.

Farmers stressed the importance of training and advisory services to help them comply with CAP regulations. Key suggestions include free advisory services (on-site assistance or dedicated hubs) to address compliance issues and prepare for inspections; training sessions and seminars in national languages to explain requirements and sanctions; enhancing networking among authorities at EU, national and local levels to streamline compliance activities. LAGs also advocate better coordination between themselves and managing authorities to ensure alignment on rules and procedures.

Improved feedback mechanisms, such as regular consultations and real-world testing of new regulations, are suggested by farmers and wine growers and producers to ensure the practical usability of new rules. Farmers also seek better feedback from Paying Agencies on submitted documents to enhance compliance and reduce administrative challenges.

Proposed solutions related to digitalisation

Digitalisation has proved to be both a virtue and a challenge. Notwithstanding the benefits in terms of easing application, recording and controls, it entails technical challenges with map drawing and identification of parcels and requires improvements in terms of user-friendliness.

Nearly half of the interviewed farmers suggested improving digital tools and automation to streamline applications, reporting and record-keeping. Key proposals emerging from interviewed farmers, but also other CAP beneficiaries, include automating repetitive tasks such as pre-filling data, creating user-friendly digital platforms and integrating government systems to avoid duplication of information and delays. Farmers and other CAP beneficiaries alike (i.e. LAGs, advisory services and POs) highlight the need to achieve interoperability between databases and payment agency systems, which would allow streamliing data sharing and updates.

Farmers also emphasise the desirability of secure platforms with offline capabilities (particularly useful for more remote areas without a stable internet connection) and the need to provide training for users with varying technical skills so that farmers and other CAP beneficiaries could adopt digital solutions more effectively.

Further specific suggestions include using remote sensing to reduce inspections, automated notifications for deadlines, digital dashboards for compliance tracking and AI to simplify routine compliance tasks. Centralised platforms, cloud storage and integration with farm management software are also recommended to reduce administrative burden and improve efficiency. Related to this, wine growers and producers suggest setting up a real-time update system to enable farmers to track the status of their applications and inspections online, improving transparency and efficiency.

Simplification, flexibility and digital transformation are recurring themes for farmers and other CAP beneficiaries. Suggested improvements reflect their practical experience and focus on reducing the administrative burden while maintaining the underlying objectives of CAP.

4.1.4. Research Question 1: conclusions

The analysis of procedural steps has sought to identify the main causes of burden associated with the process of applying for and receiving CAP funds. It also showed the peculiarities of some types of interventions as well as the issues common to all areas. Finally, the review of conditionality and other environmental requirements has delved deeper into the main challenges for farmers.

The use of multiple information sources and the collection of data from various types of beneficiaries have allowed findings to be mutually corroborated. The final picture, although not comprehensive, considering the variety of policy aspects covered and the interaction of several legislative frameworks, reveals some patterns and key aspects about complexity for CAP beneficiaries and simplification.

Administrative burden and other forms of complexity

The analysis has shed light on several forms of administrative burden for CAP beneficiaries, as further illustrated below. Reading documents and gathering information on CAP; drafting plans, collecting proofs, filling in the application form and, frequently, following-up on it; recording and reporting information (which would not be done in the absence of legal obligations) and expenditure; preparing for and attending inspections are all examples of 'information obligations' (see key terms, Section 3.1). These tasks are time-consuming but can be aggravated by duplication, inconsistencies or overlapping of legislative layers. Additional obligations and tasks are related to the drafting and management of cooperation projects, development strategies or OPs as is the case for EIP OGs, LAGs and POs.

Complexity is not only of administrative nature. Conditionality, other environmental and sanitary rules, eligibility conditions and commitment attached to voluntary schemes pose compliance-related issues: adjustment costs, loss of production, restrictions or technical and contextual issues make it difficult to meet requirements.

Lack of clarity, stability and flexibility of rules may easily add administrative burden on beneficiaries but could be considered as distinct hindering factors. The experience of farmers, other beneficiaries and Member State stakeholders make frequently reference to intangible elements (uncertainty, stress, feeling of not being trusted, 'mental load', fear of making mistakes) that are difficult to capture and assess, although they are clearly part of the perceived complexity of CAP and could to some extent be addressed by policy simplification and complementary actions (e.g. better communication, more support).

EU and national legislation

The analysis has, to the extent possible, identified sources of burden at the level of EU or national legislation (an analysis of 'shares of burden' and potential gold-plating in relation to the main areas of burden is, however, the object of RQ3). Three main conclusions can be drawn from this attempt.

First, the 'new delivery model' has significantly shifted the responsibility for administrative burden (and simplification) to Member States. The design of interventions (and the related requirements, information obligations, 'rigid deadlines'), administrative procedures and control systems is mainly or totally national, as well as the responsibility to provide clear information to beneficiaries and to harmonise information systems and reduce duplications. However, the analysis identifies complexity linked to specific pieces of EU legislation or articles of regulations (e.g. requirements for investments in irrigation, minimum budget dedicated to environment and research for POs, tasks and responsibilities of LAGs).

Second, the causes of burden directly attributed to EU level are found in IACS-based procedures (e.g. 'identification of parcels', area monitoring and geo-tagged photos) and conditionality/ environmental rules arising from CAP (GAECs) and non-CAP legislation (SMRs and related legislation). However, the analysis shows that difficulties are also linked to the operationalisation of IACS at the Member State level (including digital platforms and tools) and to the national transposition of conditionality norms, with rules made more difficult by implementation choices (e.g. additional requirements, unclear definitions, lack of flexibility).

Third, the responsibilities of EU and national legislation are inextricable in some respects, as complexity is to some extent related to general issues, specifically:

- The policy-making process, e.g. the timely approval of 2023-2027 regulations and CSPs; a common and uncontroversial understanding of the new rules, including green architecture and the novelties brought by the NDM ('who is responsible for what'?); the process of amending CSPs and other changes to legislation, a factor of uncertainty for beneficiaries.
- The interplay, partial overlap and potential conflict among multiple (EU and national) legislative layers, which the analysis could not unravel without providing some examples and reporting a widespread perception of excessive, non-harmonised legislation.

Main causes of burden and cross-cutting issues

Some of the main causes of burden mentioned across this research question were associated with more than one procedural step or requirement, allowing the identification of recurrent issues, summarised below:

- Clarity and communication: issues of clarity and lack of adequate communication are particularly relevant in the preparation step (particularly concerning eco-schemes) but also for controls. Conditionality and other requirements particularly some GAECs, are not clear for a share of farmers.
- Regulatory issues: frequently changing rules and multiple legislative layers were cited in relation to preparatory activities with impact also on applications to some extent. The analysis of recording/reporting and controls clearly showed the number of obligations and authorities involved.
- Administrative burden: information obligations were found in the application step, the related follow-up and burdensome recording/ reporting activities. Some farmers described administrative issues also in relation to conditionality and other requirements.
- Repetitive tasks: also pertaining to administrative burden, this category shows task duplication during the application and follow-up, as well as in recording/reporting and controls, mainly due to organisational issues at national level.
- Compliance: this category is primarily associated with conditionality and other environmental/sanitary requirements but is also relevant for 'difficult' eligibility conditions or commitments attached to voluntary interventions.
- Digitalisation: issues emerge in the application, which is an increasingly digital progress, and during recording/reporting. The main challenges relate to poor digital skills, platforms and tools that do not work, information systems that are not interconnected.
- Barriers to cooperation: this category combines causes of burden that are specific for EIP OGs and LAGs, which encounter additional challenges due to the nature of their projects, including resource constraints, limited administrative capacity and difficulties in networking and cooperation.
- Rule enforcement: this is specifically related to controls and refer to the perception of rules being rigidly enforced and sanctions being imposed with no flexibility. This is also mirrored in the application and reporting phase for investments, mainly linked to the justification of costs.

4.2. RQ2: What is the administrative burden arising from 2023-2027 CAP for farmers and other CAP beneficiaries?

4.2.1. Description of RQ2

This question aims to provide both a qualitative and a quantitative assessment of the administrative burden for farmers and other CAP beneficiaries to the extent possible, building on the data collected during the first phase of the study, including information collected through the TC and surveys targeting the other beneficiaries. Where appropriate, the assessment will concentrate on the administrative cost, i.e. costs which would fall into the category of 'business as usual', in alignment with the definitions from the Better Regulation Toolbox [151].

Alongside farmers, this research question also explores and quantifies, where possible, the administrative burden borne by other beneficiaries when receiving CAP support.

Based on the available data (quantitative information from the TC, farmer interviews, literature on administrative burden and surveys targeting the other CAP beneficiaries), the study maps and categorises the administrative costs for beneficiaries, seeking to identify and quantify, where possible, the main cost drivers.

In particular, the analysis focuses on the stages of the administrative processes (thus referred to as 'administrative tasks' throughout the section) linked to CAP support as those identified by farmers and further detailed across the following two main activities:

- **Application for CAP support**
  - information-gathering and preparatory steps
  - filling in and submitting CAP support applications
- **Follow-up activities**
  - recording and reporting
  - controls

In addition to examining the costs associated with the two stages of the administrative process, the financial implications of requiring external support have also been explored. This aspect holds dual significance; on the one hand, the need for external assistance to meet CAP obligations can serve as an indirect indicator of the complexity of these requirements. On the other hand, it represents an additional cost that beneficiaries must bear to complete administrative tasks, further contributing to the overall monetisation of their efforts in terms of time and resources.

The same activities apply to some extent for CAP beneficiaries other than farmers, but the data collection also focuses on specific tasks and related costs.

4.2.2. Analytical approach

The approach to identify and quantify the administrative burden follows a tiered approach, differentiating the research steps for farmers and other beneficiaries.

Approach for farmers

Estimation of administrative burden under the CAP

In relation to the **quantification of administrative burden for farmers**, the approach draws on and follows, to the extent possible, a methodology similar to the one used for the previously mentioned 2019 study [152]. This ensures reliance on a tested methodology.

As mentioned above, this study explores the administrative burden of different activities, including the application for CAP support and follow-up activities, as well as the reliance of farmers on external assistance.

The indicators used to measure cost drivers and develop estimates include:

- time spent (expressed as days) to perform individual tasks;
- lump sums linked to the use of external assistance; and
- Farm Accountancy Data Network (FADN) data on the labour costs to monetise this time.

These indicators are used in an adjusted standard cost model as presented below, where the costs (C) for a farmer (F) are the product of the time (T) the farmer spends and the average national costs of their labour (L) according to FADN data, adding lump sums for expenses (E) such as external assistance.

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

Relying on data from the TC and interviews, weighted averages of time spent and lump sums, as well as ranges for these indicators, were computed. This yielded country specific estimates for the average and median values. Sensitivity analyses to assess the variability of these ranges and determine the most appropriate indicators (refer to Annex III) were also carried out.

When data quality allowed for greater granularity, the options to differentiate cost estimates were explored further by:

- farm size
- farm type
- the number of full-time equivalents (FTEs) working on the farm
- reliance on external support

151 See TOOL #58. EU Standard Cost Model, available at URL: https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox/better-regulation-toolbox_en.

152 European Commission: Directorate-General for Agriculture and Rural Development and ECORYS, *Analysis of administrative burden arising from the CAP*, Publications Office of the European Union, 2019, https://data.europa.eu/doi/10.2762/521652.

However, the ability to perform this analysis is limited by the data availability from the TC. As the number of responses is not sufficiently large to allow for a more nuanced assessment in all countries, it was investigated whether the differentiation by size and farm type applies to a selected number of countries that contribute with sufficiently large numbers of responses to the TC. For countries with limited responses, this results in less detailed or less reliable estimates compared to those with more substantial representation. For more details regarding the assumptions applied in the estimation of administrative costs and burden for farmers, see Section 1 of Annex III.

Data sources

For farmers, the analysis relied on the information already collected so as to derive the estimates, especially pertaining to the time spent on specific tasks, the need for external assistance, etc. For this purpose, the data from both TC and farmer interviews was duly processed, e.g. to eliminate outliers and unreliable information. Thus, the information provided through the TC and the interviews forms the basis for the quantification of administrative costs and burdens for farmers.

This approach builds on the analytical framework for RQ2 presented in Annex III, which translated this study question into judgement criteria and indicators, linking them to the appropriate data sources.

As previously noted, given the significant variation in the responses to questions on the time spent in the TC and the interviews, and some of the questions instead asking about time ranges, the options to operate with several estimates, presenting lower, upper and central estimates (e.g. building on median or average values) were explored. Where data were available, a breakdown per farm characteristics, such as farm size or farm type, is provided. The advisory services survey results supplemented the insights from farmer interviews, offering a qualitative perspective on the relationship between the need for external assistance and specific interventions or farm characteristics. This connection, combined with the information on external assistance costs shared during the consultations, provides additional context and accompanying details to better understand the perceived complexity of the administrative tasks associated with the CAP.

Approach for other beneficiaries

Estimation of administrative burden under the CAP

Additional data collection from other CAP beneficiaries has been performed to complement the information required for the analysis of costs. For these categories of beneficiaries (other than farmers), comparable information has been gathered through beneficiary-specific surveys. For each beneficiary group, the analysis revolved around a specific focus, namely:

- **Producer Organisations in the fruit and vegetable sector**

  POs can be beneficiaries of various CAP measures. While they primarily benefit from sectoral interventions, such as those aimed at market organisation and sustainability within the fruit and vegetable sector, they are also eligible for other CAP measures depending on the specific CSP of each country. Beyond sectoral interventions, POs may benefit from rural development measures like cooperation projects (e.g. under Article 77) that foster innovation and sustainability. They may also be prioritised for agri-environmental and climate measures (AECM), collective knowledge transfer initiatives (KNOW) and other investment measures, e.g. in infrastructure and technology.

  This analysis focused on fruit and vegetable POs, assessing the administrative burden associated with sectoral interventions while acknowledging that these organisations may also benefit from other CAP measures. Methodologically, through a specific survey of POs, the aim was to quantify the share of administrative burden attributable to sectoral interventions relative to the overall burden of CAP activities. However, given that POs were often not able to provide precise estimates of administrative costs tied to specific interventions, percentages or other relevant quantitative proxies to capture these distinctions were collected.

- **Wine growers and producers**

  Wine growers and producers, as agricultural entities, can be beneficiaries of a range of CAP interventions. In addition to wine sectoral interventions, which are the focus of this analysis, they may also apply for basic payments, RDP measures and other sector-specific measures aimed at promoting rural competitiveness and sustainability.

  The analysis focused on the wine sectoral interventions, recognising that many wine growers also benefit from broader CAP support, such as basic payments or RDP measures, including investment support and environmental actions. Methodologically, it was attempted to quantify the share of the administrative burden attributable to sectoral interventions in relation to the overall CAP-related tasks. However, it was acknowledged that wine growers often struggled to provide precise data on the administrative burden specific to wine sectoral interventions. Consequently, the analysis relied on proportional estimates of the overall administrative burden linked to the CAP. Notably, since wine growers were also included in the TCs, the quantification of the overall CAP burden has been contrasted with the data provided in that part. Nevertheless, as the two samples differ, caution is necessary when cross-tabulating the data to ensure valid comparisons.

- **Local Action Groups**

  LAGs are primarily beneficiaries of the LEADER measure under the CAP, focusing on promoting local development in rural areas. Their role includes managing and implementing community-led local development projects that aim to enhance rural economies and improve sustainability.

  This analysis, focused specifically on the administrative burden linked to LEADER interventions, although it acknowledges that LAGs may manage several projects and funding streams under this measure, contributing to their overall administrative workload.

› **EIP Operational Groups**

EIP OGs develop projects focusing on innovation and the application of new practices in agriculture. EIP OG projects are funded under rural development interventions, particularly under cooperation fostering collaboration between research institutions, farmers and other stakeholders.

This analysis concentrated on the burden of applying for and managing EIP projects while recognising that EIP OGs play a broader role in agricultural innovation, often intersecting with other CAP-funded activities, such as knowledge transfer and cooperation projects.

› **Advisory services**

Advisory services may be beneficiaries of CAP measures themselves, such as the KNOW intervention, which supports knowledge transfer and innovation in agriculture. However, they also play a crucial role in assisting other beneficiaries (e.g. individual farmers and POs) with their administrative tasks, from applications to reporting.

For the analysis, the dedicated survey focused on two aspects: (1) the administrative burden faced by advisory services as beneficiaries when they apply for CAP support and (2) the role advisory services play in supporting other beneficiaries with CAP-related administrative tasks and applications. As mentioned above, this second aspect has been treated as an additional data source to assess the administrative burden experienced by farmers and other beneficiaries. It serves to complement the information collected through the TC for farmers and the dedicated surveys conducted with other beneficiaries.

Following the analysis of survey data collected from other CAP beneficiaries, it was decided to slightly adjust the methodological approach. This decision is primarily driven by two key challenges. The first is the limited availability of data for certain Member States and the low response rate to specific questions, particularly those concerning the number of days spent on administrative tasks. Moreover, the organisational structure of entities such as LAGs and POs can significantly influence the amount of time spent on administrative activities, leading to potential outliers that may distort the overall estimates. Additionally, providing an EU-wide average estimate of administrative costs would not accurately reflect the situation due to significant disparities in labour costs across Member States.

In light of these considerations, the analysis focused on assessing the administrative burden for other beneficiaries in terms of time allocation across different activities. Particular emphasis was placed on identifying and highlighting the administrative tasks that require the most time. For further details on the data cleaning procedures and the assumptions made in analysing the administrative burden for other beneficiaries, see Section 2 of Annex III.

Data sources

Similarly to the approach outlined for farmers, the analysis of the administrative burden for other beneficiaries draws on a combination of data sources and tools. For wine growers, as they also belong to the broader category of farmers, the responses from the previous TC (specifically Q11, Q12, and Q19) and farmer interviews filtering the replies specifically for those who identified wine as their sector were leveraged. This provided insights into the overall administrative burden faced by wine growers. However, the primary source of information for all beneficiary categories is a set of targeted surveys, each tailored to the specific group.

In addition, desk research complements this approach. For instance, studies such as those on LEADER [153] and EIP-AGRI [154] have been reviewed to identify any quantifiable data on the administrative burden affecting these specific categories of beneficiaries.

4.2.3. Analysis of findings

4.2.3.1. Administrative burden for farmers (RQ2.a)

Box 14. Key findings in relation to costs associated with administrative tasks for farmers

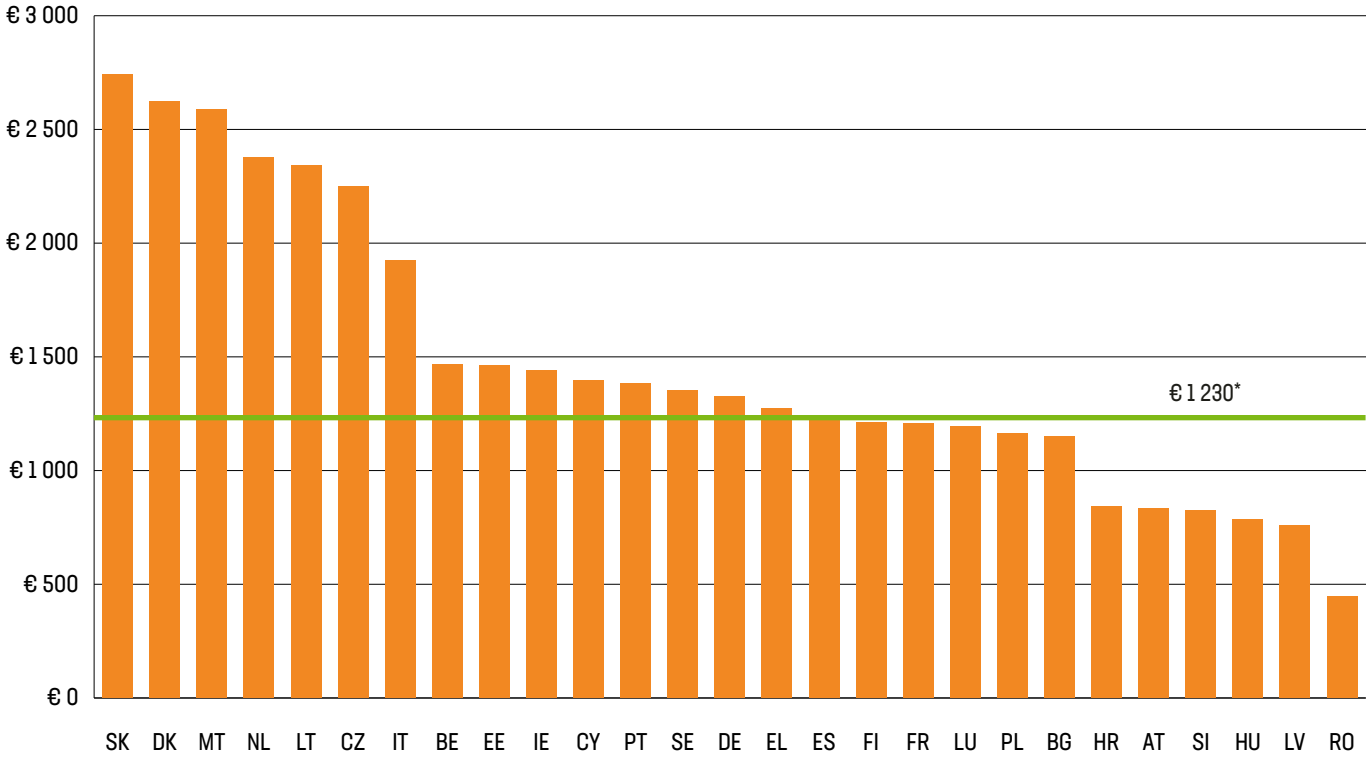
The average annual cost of CAP-related administrative tasks, covering both the application (preparation and submission) and the follow-up phase (recording, reporting and controls) per farmer is EUR 1 230, roughly equally distributed between internal costs and external costs (i.e. advisory services). On average, EU farmers spend seven working days annually on these tasks. However, farm size plays a significant role: smaller farms under 5 hectares typically spend one to four days, while larger farms over 500 hectares often report spending six days or more. When weighting by farm size is taken into account, the EU estimate of the time spent by farmers on CAP-related activities decreases to 5.6 days per year. Additionally, applying stricter and more relaxed assumptions in the data treatment produced a range of estimates between 5.6 and 8.7 days per year. Farm type further impacts this cost, with field crop and livestock farms experiencing higher administrative workloads compared to horticulture farms. The use of paid external support is widespread, with 78% of farmers responding to the TC relying on advisory services primarily provided by farmers' associations or cooperatives. External costs are notably higher for larger farms, particularly those involved in cereals, beef and forestry sectors. Additionally, insights from the survey with advisory services revealed that farmers typically face repeated requests to submit the same information.

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

153 European Commission: Directorate-General for Agriculture and Rural Development, ECORYS, EEIG AGROSYNERGIE and METIS, *Evaluation support study of the costs and benefits of the implementation of LEADER – Final report*, Publications Office of the European Union, 2023, https://data.europa.eu/doi/10.2762/995751.
154 European Commission – Directorate-General for Agriculture and Rural Development – Unit A.3 (2024): *Study on outcomes achieved by EIP-AGRI Operational Group projects under the CAP*, https://eu-cap-network.ec.europa.eu/publications/study-outcomes-achieved-eip-agri-operational-group-projects-under-cap_en.

Based on the TC, the average annual cost of CAP-related administrative tasks per farmer was EUR 1 230. This average estimate takes into account the whole EU, with estimations on the average annual costs ranging from EUR 450 in Romania to EUR 2 740 in Slovakia. For one-third of the sample, the estimated total administrative burden is less than EUR 1 000. For three-quarters of the sample, it is less than EUR 2 000. The figure below shows the estimated administrative burden cost for farmers per country.

Figure 20. Average total costs spent by farmers on administrative tasks by country



* EU estimate of the average total cost spent by farmers on administrative tasks, taking into account the estimate of spending seven working days per year on CAP-related administrative tasks

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=16 783 responses)

To derive these estimates, the analysis encompasses two components, as elaborated in the analytical approach (refer to Section 4.2.2). Specifically:

1. **Internal costs**. This component is based on the value of time spent by farmers, their families and employees on administrative tasks, which were calculated using time estimates from the TC. To monetise these time estimates and estimate the internal costs, FADN data on paid labour input and wages were used. Hourly wage rates for each country from 2021 and 2022 were adjusted to 2023 values by applying country-specific inflation rates. These adjusted wage rates were then multiplied by the time farmers reported spending on administrative tasks to calculate the total internal costs.
2. **External costs**. This component refers to expenses incurred for outsourced services, such as professional assistance with CAP aid applications. To assess this component, farmers were asked in the TC whether they relied on outside assistance to prepare and submit their 2023 CAP support applications, alongside the associated costs. Costs reported in local currencies were converted into euros to allow for a comparison.

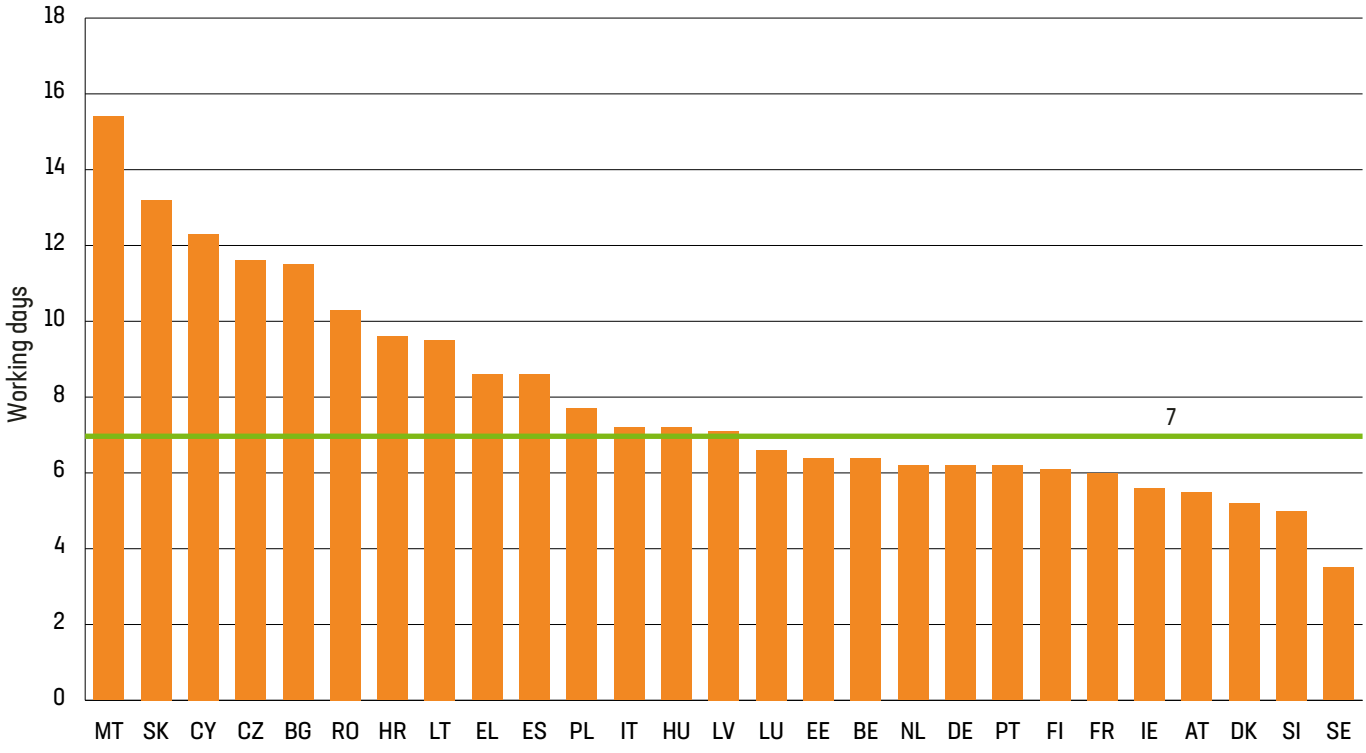
The sections below provide further details on the calculation of both cost categories.

Internal costs

EU farmers spend an average of seven working days per year on CAP-related administrative tasks [155] **with an estimated average cost of EUR 630 per year.** The analysis of the TC revealed the annual average time spent by farmers and their employees on CAP-related administrative tasks, with variations based on farm size, type and country. The average time farmers spend on administrative tasks varies significantly across countries, ranging from 3.5 days to 15.4 days. The highest averages are in Malta (15.4 days), Slovakia (13.2 days) and Cyprus (12.3 days), while the lowest are in Slovenia (4.98 days) and Sweden (3.47 days). Most other countries fall between five and nine days, reflecting differences in administrative complexity, farm size and access to support services.

155 This average excludes farmers who reported more than 100 working days, responses marked as 'I do not know' or 'N/A' and cases where respondents indicated more than six working days but did not provide a specific answer (see Annex III).

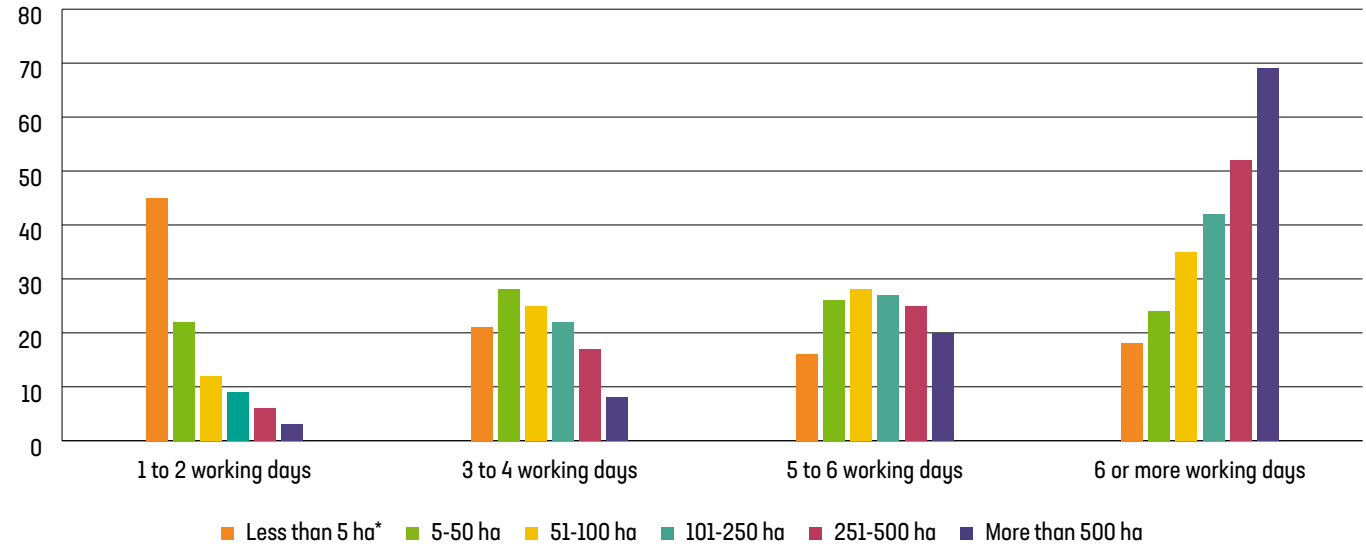
Figure 21. Average time spent by farmers on administrative tasks by country



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=16 783 responses)

Notably, these estimates do not apply weighting procedures to account for farm size or other structural factors. However, the analysis of responses from the TC indicates a 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. In contrast, larger farms (more than 500 hectares) often report spending more than six working days on administrative tasks (see Figure 22).

Figure 22. Time spent by farmers on administrative tasks by farm size



* Includes farms without land.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=20 764 responses)

Given the impact of farm size on reported time spent on administrative tasks, it is valuable to consider the actual distribution of farm sizes across the EU (see Annex III, Sub-section 1.1.3). To account for this, a weighted average by farm size was calculated using Eurostat data [156] on the distribution of farms. The weighting reflects the total farm population by size class without differentiating between CAP beneficiaries and non-beneficiaries and may therefore capture characteristics of the broader farming population. Notably, the weighting approach could only be applied to estimate the EU-level time spent on administrative tasks due to insufficient responses per farm size category for several Member States from the TC.

Following the application of farm size weighting, the estimated EU average time spent on administrative tasks decreases to **5.6 working days per year** [157].

Beyond the adjustment for farm size, further analysis was carried out to explore how different methodological choices and assumptions affect the overall EU-level estimate of time spent on administrative tasks (see Annex III, Sub-section 1.1.3). This involves testing a series of alternative scenarios to address uncertainties in the data and assess the sensitivity of the results. These scenarios focus on key factors that could influence the estimates, where assumptions were either relaxed or made stricter to test their impact. By applying these scenarios, the analysis provides a range of plausible EU-level estimates rather than relying on a single figure. A detailed overview of the different scenarios can be found in Annex III, Sub-section 1.1.3.

An important factor to consider is how to account for farmers who report spending more than 100 days per year on CAP-related administrative tasks. Including these cases raises the average annual administrative burden to an estimated 6.2 working days per farmer across the EU [158].

Moreover, alternative scenarios were tested to assess how the treatment of the 3 891 farmers who reported spending 'more than six working days' on CAP-related administrative tasks without specifying an exact number affected the overall estimate. In one scenario, these responses were assigned a fixed value of seven working days, based on the assumption that if the actual values were substantially higher than six working days, respondents would have been likely to specify it. This approach led to EU average estimates of approximately 5.8 or 6.3 working days per year, depending on whether responses reporting more than 100 working days were included. In another scenario, these responses were redistributed according to the distribution of working days reported by respondents who provided specific figures. This approach resulted in a higher EU average estimate of around 8.7 working days per year spent on CAP-related administrative tasks [159].

Results from the TC suggest that reported CAP-related administrative time tends to increase with the number of full-time employees (FTEs) per farm. For instance, 30% of farms with two FTEs indicated spending more than six working days on administrative tasks, compared to 48% of farms with six to ten FTEs. Further analysis of farmers who reported spending more than six days on CAP-related administrative tasks shows no clear correlation between the number of days spent on administration and the number of FTEs employed. While certain categories, such as those reporting 20 to 25 days (8.0 FTEs), display higher averages, FTE numbers fluctuate across other time ranges without a consistent pattern (see Annex III, Sub-section 1.1.3).

To explore the potential influence of workforce size on the estimates, a rule is applied to address cases where the reported time spent on CAP-related tasks is very high compared to the number of FTEs. Specifically, responses are excluded where more than 50% of the total available FTE time is reported as being spent on administrative tasks. Applying this rule led to slightly lower EU-level estimates, with estimate averages ranging from 6.1 to 6.2 working days per year [160] (depending on the combination of other assumptions used).

In addition to the weighting by farm size, an alternative weighting method was applied using the total number of agricultural holdings per Member State. This approach weighted the estimates of time spent on administrative tasks by Member States according to the number of farms in each country using Eurostat data [161]. As a result, greater weight was given to countries with a higher number of farms, such as Romania, where small farms are highly prevalent. Applying this method increased the EU-level estimate to **8.5 working days per day** [162].

Depending on the combination of assumptions and methods applied, the estimated EU average time spent on administrative tasks ranges from 5.6 to 8.7 working days. These results highlight how the overall cost estimates are shaped by the treatment of responses and the methodological choices applied, providing a plausible range for the estimated administrative costs at EU level.

In addition to the farm size and the number of FTEs, the **farm type** is another factor impacting the time spent on administrative tasks, including both application and follow-up phases. Field crops and livestock farms generally report higher administrative burdens than horticulture farms. For instance, farmers engaged in field crops and livestock often report a higher number of working days dedicated to administrative tasks overall (including both application and follow-up phases), while horticulture farms typically report lower time investments in this regard.

When the time spent on administrative tasks is monetised through the FADN average yearly salary for farmers in each EU country, the estimated costs of internal administrative tasks carried out by the farm owner, family members and employees range between EUR 255 in Romania and EUR 1 230 in Slovakia, with an EU average of **EUR 630 per year**. Across the different scenarios used to estimate the EU average time spent on CAP-related administrative tasks, the corresponding internal cost at EU level ranges from approximately EUR 500 to EUR 1 020 per year.

156 Farm indicators by legal status of the holding, utilised agricultural area, type and economic size of the farm and NUTS 2 region [ef_m_farmleg__].

157 This estimate includes the weighting by farm size and excludes farmers who reported more than 100 working days, responses marked as I do not know' or 'N/A' and cases where respondents indicated more than six working days but did not provide a specific answer.

158 This estimate includes the weighting by farm size and excludes responses marked as 'I do not know' or 'N/A' and cases where respondents indicated more than six working days but did not provide a specific answer.

159 This estimate includes the weighting by farm size and excludes responses marked as 'I do not know' or 'N/A', while applying the redistribution of respondents indicated more than six working days but did not provide a specific answer.

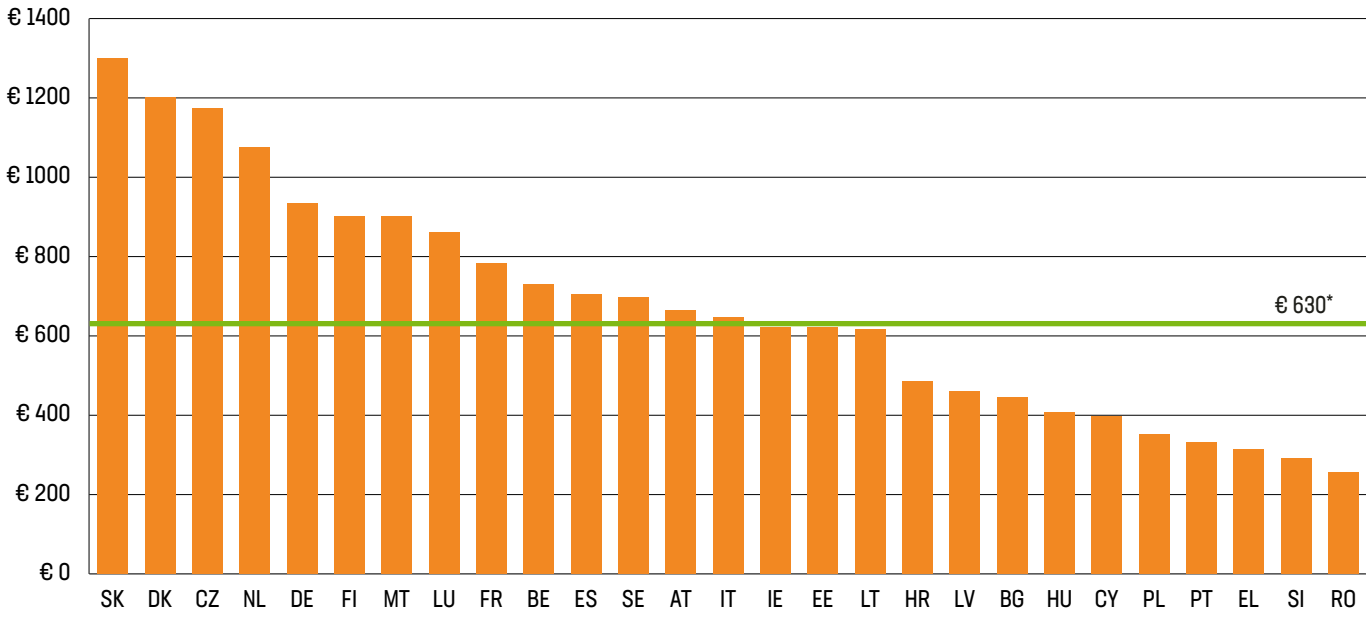
160 The difference in the estimates is explained by how incomplete responses are treated. Excluding responses marked as 'I do not know' or 'N/A', as well as cases where respondents indicated 'more than six working days' without specifying an exact number, results in an average of 6.1 working days. Alternatively, assigning a fixed value of seven working days to these unspecified responses increases the estimate to 6.2 working days.

161 Farm indicators by legal status of the holding, utilised agricultural area, type and economic size of the farm and NUTS 2 region [ef_m_farmleg__].

162 This estimate includes the weighting by number of agricultural holdings and excludes responses marked as 'I do not know' or 'N/A' and cases where respondents indicated more than six working days but did not provide a specific answer.

Approximately 85% of farmers incur less than EUR 1 000 in internal administrative costs, and two-thirds spend less than EUR 750, indicating that while some farmers face high costs, the majority experience more moderate internal administrative expenses. These differences in internal costs are influenced by both the number of days farmers spend on administrative tasks and the prevailing wage levels in each Member State. For example, Denmark's farmers dedicate just over five days annually to administrative activities, but these translate to around EUR 1 200 due to relatively high labour costs. In contrast, Romania's farmers spend more than 10 days yet face costs of only about EUR 255, reflecting significantly lower wage levels, as shown in the figure below.

Figure 23. Average internal costs spent by farmers on administrative tasks by country



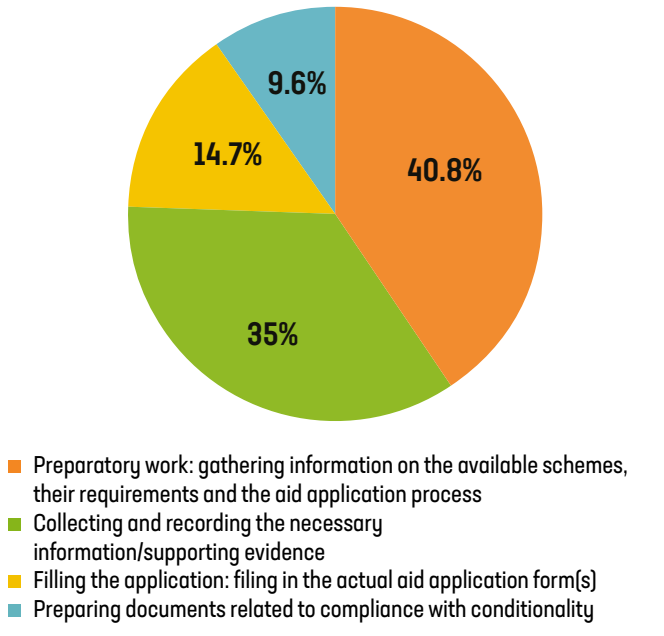
* EU estimate of the average internal cost spent by farmers on administrative tasks, taking into account the estimate of spending seven working days per year on CAP-related administrative tasks.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=16 783 responses)

Farmer interviews confirm these findings, offering complementary insights into the distribution of time across different stages of administrative tasks. The figure below illustrates the distribution of time spent on various stages of the aid application process. Preparatory work, including gathering information on schemes and requirements, accounted for the largest share at 40.8%, followed by collecting and recording necessary documentation at 35%. Together, these stages represent over 75% of the total time spent. Filling in application forms required significantly less time at 14.7%, while preparing compliance documents accounted for the remaining 9.6%. This distribution emphasises that the bulk of farmers' time spent on administrative tasks is devoted to preparation and record-keeping.

The TC also provided insights into the time allocated by farmers on the specific activity of **inspections**. Responses from the consultation reveal the frequency of inspections and the time required to handle them. Over the past three years, 30% of respondents reported never being inspected, while 36% were inspected once, 18% were inspected twice and 16% experienced three or more inspections. For those farmers who underwent inspections, they spent an average of 1.1 working days per visit, including preparation and follow-up activities. The average time per Member State ranges from 0.6 working days in Malta to 1.3 working days in SK, RO and FI (see Figure 25) [163].

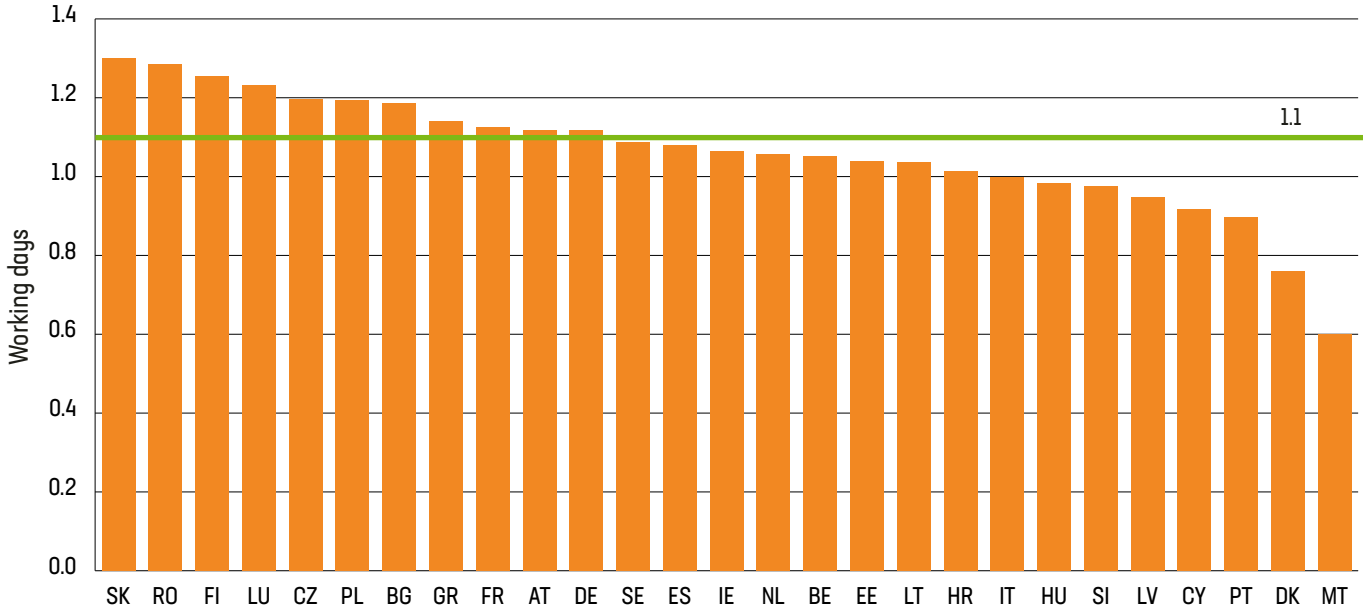
Figure 24. Distribution of total time across activities



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of farmer interviews data (N=148 responses)

163 Responses indicating more than two working days spent on inspections were excluded from the calculation of the overall average, as a reliable estimate for these cases could not be determined.

Figure 25. Average time spent by farmers on-farm inspections by country



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of TC data (N=12 507 responses)

External costs

In 2023, European farmers borne an average cost for advisory services of EUR 601. The use of paid external support for aid-related administrative tasks is widespread among EU farmers, with 78% opting for these services. Most of this support comes from farmers' associations or cooperatives. Many also turn to private companies, such as banks or other service providers, while a smaller portion receives assistance from public authorities. External support is particularly common in countries such as EL, ES, IT, SI and IE, where over 90% of farmers make use of it. In contrast, it is less common in FI, LV, HR and SE, where fewer than 50% of farmers use such services. According to the results of the TC, the cost of external support varies significantly across EU countries [164]. About two-thirds of farmers pay less than EUR 1 000 per year for external support, while one-third spend less than EUR 425. In this consultation, farmers were asked to report their expenditure on advisory services for the year 2023, but several considerations must be taken into account to properly contextualise this figure. As such, the figure reflects not only the actual expenditures incurred by farmers but also the contextual and methodological constraints inherent in the data collection process. The reported costs exhibited vary significantly, which may reflect the specific circumstances of 2023. For instance, some farmers reported unusually high expenditures, likely due to one-time consulting needs, such as advisory services for specific rural development interventions involving substantial budgets. These costs are not representative of a typical yearly expenditure and could disproportionately influence the overall estimate. To address this, the calculation of the average was restricted to responses below EUR 10 000. Expenditures exceeding this range were excluded, as they are unlikely to reflect the standard costs incurred by most farmers for advisory services. Additionally, some farmers indicated that they utilised external advisory services but did not report any associated expenditure. This lack of cost data could be attributed to several factors. In some cases, advisory services may have been provided free of charge, potentially as part of publicly funded programmes. Certain countries, for instance, offer free or heavily subsidised advisory services to farmers. Furthermore, some advisory services – such as those related to product marketing – may not have entailed a direct financial cost for the farmer.

Larger farms (101-500 ha or more) active in the cereals, beef and forestry sectors tend to face higher external costs. Similarly to the analysis performed for internal costs, patterns can be identified in relation to external costs and factors such as **farm size** and **farm type**. Larger farms (101-500 ha or more) that manage diverse activities, like cereals, beef and forestry, tend to face higher external costs due to the complexity of their operations and compliance requirements, as well as their high volume of operations. Conversely, smaller farms (less than 50 ha), which often focus on one type of production, such as olive oil or specific crops, generally experience lower external costs.

In addition, the majority of farmers in all categories rely on external support for CAP aid applications, regardless of the time spent on administrative tasks. However, farmers who rely entirely on external support tend to report longer administrative times, often exceeding six working days, compared to those using partial or no support. In contrast, shorter durations, such as one to two working days, are more common among farmers who manage tasks independently or with partial support. This suggests that reliance on external support is associated with more complex or time-consuming administrative processes.

164 For external costs (i.e. use of advisory services), no weighting or differentiation by farm size was applied. This decision was taken to maintain consistency with the overall cost estimation approach, which relies on a single EU-level estimate for both internal and external costs.

The survey with advisory services provides critical insights into the issue of **repeated reporting of information** faced by farmers and other CAP beneficiaries. As advisors often support farmers in managing administrative obligations, they are well-positioned to shed light on the extent and nature of these challenges.

When asked whether farmers are required to report the same information multiple times, **72%** of respondents to the survey of farm advisory services confirmed this issue:

- **47%** indicated that farmers must submit the same data to **different authorities**, highlighting a clear lack of coordination and data exchange between administrative bodies.
- **25%** reported that the same data must be submitted to the **same authority multiple times**, further pointing to inefficiencies within administrative processes.
- In contrast, **13%** stated that repeated reporting does not occur, while **16%** were not aware of the issue.

The follow-up question on **what specific data must be repeatedly reported** reveals the types of information and proofs most frequently affected. These include:

1. **Livestock data**: animal movements, inventories and reporting logs submitted to various agricultural, veterinary and environmental agencies.
2. **Crop and land data**: georeferenced crop declarations, land ownership records, pesticide and fertiliser use, cultivation data reported for CAP compliance, environmental controls and national programmes.
3. **Fiscal and personal data**: tax records, social security details, employment history, and proof of enterprise status submitted to paying agencies, banks and labour authorities.
4. **Administrative documents**: ownership certificates, invoices, permits and other records are repeatedly requested, even when already stored in administrative systems or previously submitted.

4.2.3.2. Administrative burden for other CAP beneficiaries (RQ2.b)

Box 15. Key findings in relation to costs associated with administrative tasks for other CAP beneficiaries

Producer Organisations (POs): More than half of POs report spending over 100 days annually on CAP-related administrative tasks, driven by their role as intermediaries managing applications for multiple members. Sectoral interventions are particularly demanding, with 73% of the respondents to the targeted survey 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: Wine growers spend an average of 16 days annually on CAP-related tasks, with more than 14 days focused on sectoral interventions. These tasks are perceived as more complex when they require higher time investments, amplifying the administrative burden. Specifically, those spending over 10% of their time on such interventions [165] appear as more likely to perceive these tasks as 'much more complex' compared to those spending less time. This suggests that tasks consuming a larger share of time may also be perceived as more complex, potentially reinforcing the burden associated with sectoral interventions.

LAGs: These 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 Operational Groups: Administrative burden for OGs varies based on their diverse structures, team sizes and project scopes. According to survey respondents, the time spent by OGs on administrative tasks linked to CAP interventions is relatively balanced between the application and follow-up phases, with slightly higher demands reported during the follow-up phase. Unlike other beneficiaries, OGs rely slightly on external support, leveraging their in-house expertise to manage CAP requirements.

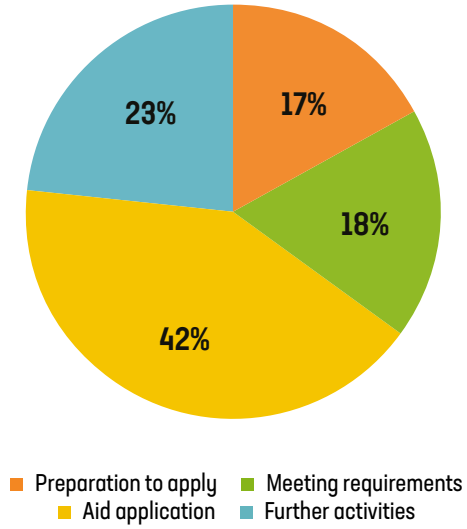
Advisory services: Advisory services balance their role as both beneficiaries and providers of CAP-related assistance. Equipped with significant expertise, 71% manage CAP applications independently, reflecting their ability to navigate administrative requirements without external support.

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

165 37% of total respondents (N=65 respondents to the survey of wine growers and producers).

More than half [166] **of POs taking part in the survey declared they spent over 100 days per year on administrative tasks related to CAP support**. Survey findings provide a detailed overview of the annual time spent by POs on administrative tasks related to CAP support. On average, POs report spending 100 days annually on the application phase, which highlights a substantial workload required by PO responding to the survey to prepare, submit and follow up on CAP-related applications [167]. Within this phase, 17.4 days are dedicated to preparatory tasks such as reading legislation, gathering information, and making decisions, while 18.1 days are spent ensuring compliance with eligibility conditions, conditionality, and selection criteria. The aid application itself, which includes drafting documents, collecting evidence, and submitting the forms, emerges as the most time-consuming activity, requiring 42.2 days on average. Following submission, 23.3 days are spent on further activities, such as responding to additional requests, providing evidence and communicating with authorities.

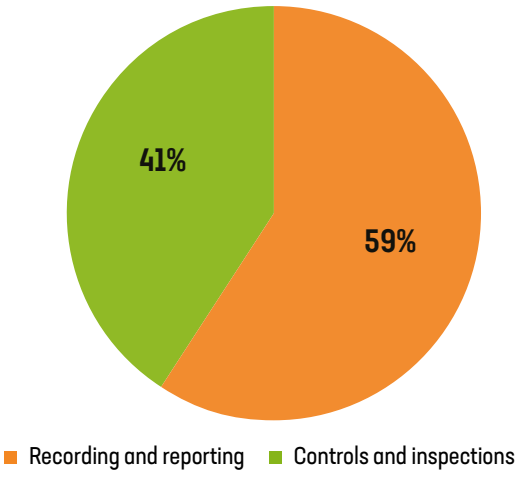
Figure 26. Distribution of time spent by POs on activities related to the application phase



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of POs survey data (N=42 responses)

The **follow-up phase**, which is less time-consuming, remains significant, accounting for an average of **52.2 days annually**. This phase primarily focuses on maintaining compliance after the application process, with **31 days** spent recording and reporting information such as expenditures and drafting payment claims. Another **21.2 days** are required for controls and inspections, where POs prepare documentation, attend inspections and follow up with authorities. Figure 27 illustrates the breakdown of time spent by POs in dealing with activities related to the follow-up phase.

Figure 27. Distribution of time spent by POs in activities related to the follow-up phase



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of POs survey data (N=42 responses)

These numbers are notably high, and while they reflect the administrative complexity of CAP procedures, it is likely that they are influenced by several factors. First, the time reported might be **proportional to the size of the PO** itself, as larger organisations often manage higher volumes of data, members and administrative requirements. Second, the burden might also be tied to the **number and scope of CAP interventions** that a PO applies for. POs managing multiple interventions or projects must handle more documentation, compliance requirements and follow-up activities, which naturally leads to higher time commitments. Additionally, these figures must be understood within the broader operational context of POs, which are often responsible for coordinating applications on behalf of multiple producers or members. This intermediary role amplifies the administrative workload, as POs must consolidate, verify and submit information for numerous stakeholders while ensuring accuracy and compliance.

POs are sometimes required to report the same information multiple times. POs participating in the survey provided specific examples of information that they are frequently required to submit multiple times, often with associated proofs. Commonly cited examples included information related to the calculation of the value of marketed production, reimbursements of investments to partners and the withdrawal of products from the market. Additionally, respondents highlighted repeated submission requirements for contracts managing bank accounts, lists of members and details of crops grown in specific blocks – information that, in many cases, remains unchanged year after year. Certain administrative processes were also described as duplicates. For example, POs reported having to resubmit data on expenditures, loan contracts and certification of quality contracts across different stages, such as the initial application, payment applications and control levels. This was particularly noted in Portugal, where respondents reported a lack of coordination between departments within the same ministry. Similarly, annual reports often required POs to retroactively verify information, such as traded production volumes, which had already been reported earlier.

166 23 out of 42 respondents.
167 Operational Programmes.

A significant proportion of POs make use of external assistance to manage compliance and reporting tasks related to CAP support. Specifically, 56% of respondents (23 POs) indicated that they relied on external consultants or advisory services, while 42% (18 POs) reported managing these tasks internally without external assistance. It is noteworthy that 25 responses were left blank, which might suggest that some POs either do not engage in CAP-related reporting or did not find the question applicable to their circumstances. Respondents provided data on the annual cost of such assistance in their local currency, with an average of **EUR 10 058.33** per year, which is sensibly higher than the average EU estimates for farmers (see sections above), which was around EUR 600 per year. Similarly, as mentioned in the sections above, these higher figures should be put into perspective with the volume of operations of POs, which is typically significantly higher than that of individual farmers.

POs report spending an average of 41.4 days annually on reporting activities related specifically to sectoral interventions, reflecting a significant portion of their administrative workload. When compared to the total of 152.2 days spent annually on all CAP-related administrative tasks, reporting for sectoral interventions alone accounts for approximately 27% of the overall burden. This absolute figure aligns with the proportion of time respondents report dedicating to these activities asked in another section of the survey: 73% indicated that more than 10% of their working time is spent on tasks related to sectoral interventions, while 24% allocate between 5% and 10% and only a very small minority (2%) spend less than 5%. These findings are consistent with the observed average time, reinforcing the fact that reporting requirements for sectoral measures in the fruit and vegetable sector demand significant effort relative to other CAP-related activities.

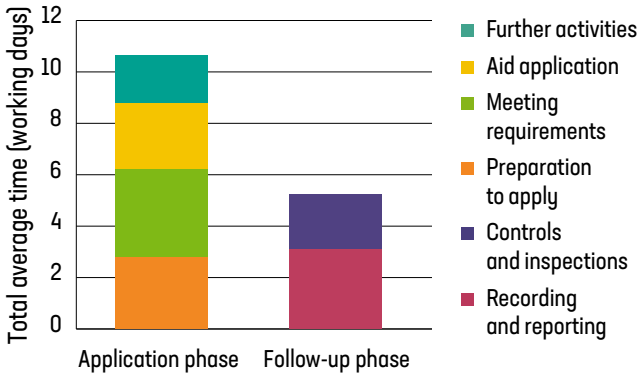
More than half of POs responding to the survey find administrative tasks related to sectoral intervention more complex than other CAP interventions. When asked to compare the complexity of tasks related to sectoral interventions for the fruit and vegetable sector with other CAP interventions, 59% of respondents indicated that these tasks were much more complex, while 22% found them to be about the same complexity. Among respondents who reported spending more than 10% of their working time on these tasks, 18 perceived them as significantly more complex, indicating a direct correlation between the perceived complexity and the time investment required. Conversely, those with lower time commitments, such as respondents spending between 5% and 10% of their time, showed more varied perceptions of complexity, suggesting that individual circumstances and task scope influence the workload.

Wine growers and wine producers

Wine growers report an average of 15.88 days spent on CAP-related administrative tasks. The findings are based on survey responses from 194 wine growers across various Member States. However, it should be noted that the sample is self-selected, meaning participants voluntarily chose to respond to the survey. As such, the results may not be fully representative of all wine growers in the EU. Most responses were received from France (55 respondents), Spain (54) and Portugal (30), with other countries contributing smaller numbers of participants. As such, given the self-selected nature of the survey sample, the findings should be interpreted as indicative of the experiences of the participating wine growers rather than fully representative of all EU wine growers.

The figure below provides an overview of the total time spent in the application phase and the follow-up phase.

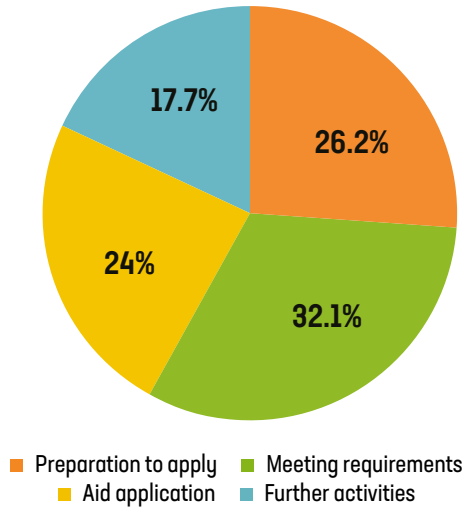
Figure 28. Total time spent in the application phase and follow-up phase



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/wine producers survey data (N=54 respo nses)

Respondents reported spending an average of 10.66 days per year on tasks within the **application phase**, making it the most time-intensive phase. The most time-consuming activity was the one labelled as 'Meeting requirements', which accounted for 32.1% of the total time in this phase and involved tasks such as compliance with conditionality and eligibility conditions. The category 'Preparation to apply' followed, representing 26.2% of the time, with activities such as reading legislation, gathering information, and making decisions requiring substantial effort. The category 'Aid application' constituted 24% of the time, focused on drafting documents, collecting evidence and completing application forms. Finally, the category of activities 'Further activities on aid application', which includes tasks after submission such as providing additional information or evidence and communicating with authorities, represented 17.8% of the time. The figure below provides a breakdown of the average time spent on each activity, highlighting the proportions allocated to each step of the application phase.

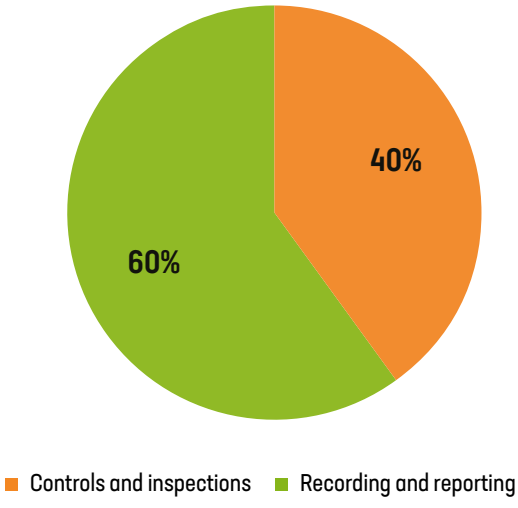
Figure 29. Distribution of time spent by wine growers on activities related to the application phase



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/ wine producers survey data (N=54 responses)

The **follow-up phase** was reported to take an average of 5.22 days per year, with activities focusing primarily on **recording and reporting**, which accounted for 59.6% of the time in this phase. This included fulfilling obligations such as documenting expenditures and drafting payment claims. The remaining 40.4% of the time was spent on **controls and inspections**, involving tasks such as preparing for on-site inspections, attending inspections, and liaising with inspectors. The figure below illustrates the proportion of time spent on activities in the follow-up phase.

Figure 30. Distribution of time spent by wine growers on activities related to the follow-up phase



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/wine producers survey data (N=54 responses)

The time spent on administrative tasks by wine growers was also assessed through the TC, where farmers identifying as wine growers reported an average yearly expenditure of **3.9 working days** [168]. This figure is notably lower compared to the parallel estimate obtained from the survey, which revealed a substantially higher average of **15.88 days** per year spent on administrative tasks. This significant discrepancy between the TC and the survey results may stem from several factors as the samples differ considerably. The survey's sample size was smaller and less representative, with a higher concentration of responses from prominent wine-producing countries such as FR, PT and ES. This geographic imbalance may have influenced the average. Furthermore, unlike the TC, which exclusively involved farmers, the survey encompassed both wine growers and wine producers. These two groups face markedly different administrative demands. Wine producers, in particular, are often subject to additional requirements linked to specific sectoral interventions, which likely necessitate more time for compliance. Ultimately, these contextual differences reveal the complexity of accurately quantifying the administrative burden across different subsectors of the wine industry.

19% of respondents also noted instances of having to report the same information multiple times, either annually or within the same process. This includes proof of ownership, invoices and land use data. Additionally, overlapping data requests from different agencies – such as CAP, customs, national agencies and organic certification bodies – create further redundancies. Another recurring theme mentioned is the **inefficiency in processes**, where a lack of inter-agency communication or system integration leads to manual duplication of work. For instance, farmers often have to re-declare organic land parcels or resubmit identical documents for both application and certification processes. Farmers also face **technical challenges**, particularly with malfunctioning digital tools or applications intended for reporting, *de facto* obliging farmers to submit multiple times. Some challenges are **sector-specific**, such as the repeated annual reporting for perennial crops, extensive documentation requirements for vineyard restructuring and delays in updating CAP eligibility for land classification, which necessitate multiple submissions. Finally, wine farmers responding to the survey highlight a **lack of harmonisation** among institutions, resulting in disparate formats or requirements for similar data. This includes differences in reporting standards for property taxes, customs and ecological certifications, which further complicate the process. These combined challenges make reporting an excessively labour-intensive task, with farmers dedicating significant effort to preparing and submitting documents like farm logbooks, phytosanitary product invoices, lease agreements and insurance claims.

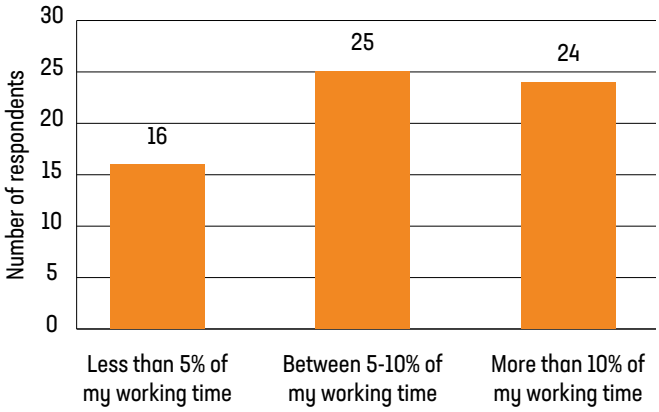
The cost of external administrative assistance for CAP-related tasks is a key aspect of the burden faced by wine growers. This aligns with the broader farmer sample estimates discussed in the previous section (EUR 405). As with the general farmer analysis, costs exceeding EUR 10 000 per year were excluded from the average calculation, as these likely represent one-off expenses tied to specific circumstances rather than typical annual expenditures, often incurring additional costs for preparing and submitting CAP aid applications. **For those who reported not using advisory services to support their CAP administrative tasks**, the responses reveal various reasons behind this decision. **A recurring reason is the cost of these services**, which many respondents consider too expensive

168 This figure, derived from 637 responses, is notably lower compared to the time spent by farmers in general (see section above) in the same consultation. The relatively lower average can partly be attributed to the exclusion of responses from 122 participants who reported spending more than six working days but failed to provide sufficient detail. By omitting these incomplete responses, the overall average was reduced.

or an unnecessary additional expense, particularly for smaller farms or those with specific needs that may not justify external assistance. Some farmers also expressed frustration with the perceived obligation to use these services due to unclear administrative processes, noting that advisory services often capitalise on the complexity of CAP requirements. Others emphasised their ability to manage these tasks independently, citing their capability or experience in handling administrative processes when proper guidance or clear documentation is available. For farmers who are part of cooperatives or professional associations, internal support often replaces the need for external advisory services. Technicians from cooperative wineries or regional agricultural associations provide adequate help in completing the required documentation, enabling farmers to save costs and avoid reliance on external advisors. Another concern raised by respondents was the lack of awareness regarding available advisory services or the trustworthiness of such services. Some farmers were unsure of whom to contact or the costs involved, while others felt that the advisory sector feeds into an 'intermediate market' rather than directly benefiting farmers. A few respondents advocated for a more autonomous approach to farming, suggesting that reliance on consultancy services undermines independent agricultural practices. A small number of respondents noted broader issues within the wine sector, such as an ageing population and limited opportunities for younger farmers, which exacerbate the challenges of managing administrative tasks. While some respondents indicated that they occasionally rely on professional advisors, the general sentiment suggests a preference for more accessible, cost-effective and straightforward administrative processes that reduce or eliminate the need for external assistance.

Respondents spending over 10% of their time on sectoral interventions are more likely to view these tasks as significantly more complex. While wine growers face the general administrative burden of CAP requirements, sectoral interventions targeting the wine sector introduce specific challenges. These include additional compliance and reporting tasks linked to market support, environmental actions and other wine-specific measures. Survey findings attempted to provide an estimate of the time spent by wine growers, specifically on sectoral interventions, as these activities, though narrower in scope, often require substantial time investments relative to overall CAP burdens. When it comes to time spent specifically on tasks linked to sectoral interventions, the analysis of the responses reveals an interesting interplay between the perceived complexity of administrative tasks related to sectoral interventions and the reported time burden associated with them. While respondents indicated that the average annual time spent on all CAP-related administrative tasks is 15.88 days, the time reported for sectoral interventions alone in Question 12 averaged 14.33 days. This nearly equivalent time allocation suggests inconsistencies in how respondents estimated their workload, as sectoral interventions are only one component of CAP-related tasks, which in turn may reflect differences in understanding of what constitutes sectoral interventions as well as inaccuracies in tracking time spent on administrative tasks. When considering the percentage of total CAP workload dedicated to sectoral interventions, the majority of respondents estimated it to be 10% or less, which sharply contrasts with the high average time reported above.

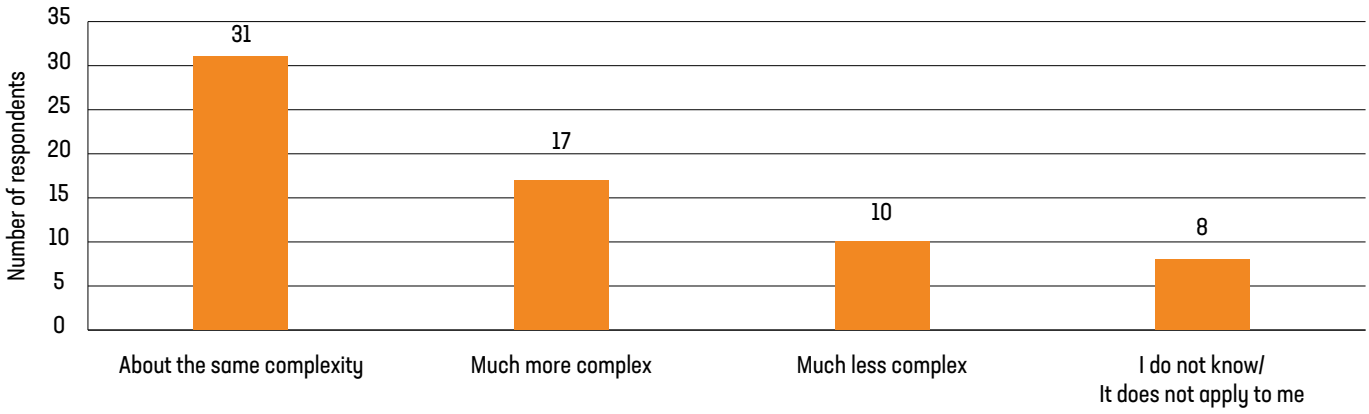
Figure 31. Number of responses per % of time range



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/wine producers survey data (N=65 responses)

This discrepancy could be attributed to the way respondents perceive the complexity of sectoral interventions. 26% of respondents describe sectoral interventions as 'much more complex' than other CAP-related tasks, and 47% perceive them as 'about the same complexity', as shown in the figure below. Tasks perceived as more complex may have been remembered as more time-consuming, potentially inflating the reported burden for sectoral interventions.

Figure 32. Number of responses per category of complexity



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of wine growers/wine producers survey data (N=65 responses)

When plotting information on complexity and time spent together, it appears that respondents who spend **more than 10% of their time** on sectoral interventions are more likely to perceive these tasks as 'much more complex' compared to those spending less time. This suggests that tasks consuming a larger share of time may also be perceived as more complex, potentially reinforcing the burden associated with sectoral interventions. Among respondents estimating sectoral interventions to take **between 5% and 10%** of their time, most consider the complexity 'about the same' as other CAP tasks. This indicates that moderate time commitments may align with a perception of similar complexity. Finally, respondents who spend **less than 5% of their time** on sectoral interventions are more likely to describe these tasks as 'much less complex' or 'about the same complexity'. This aligns with the idea that tasks requiring minimal time are often perceived as less burdensome.

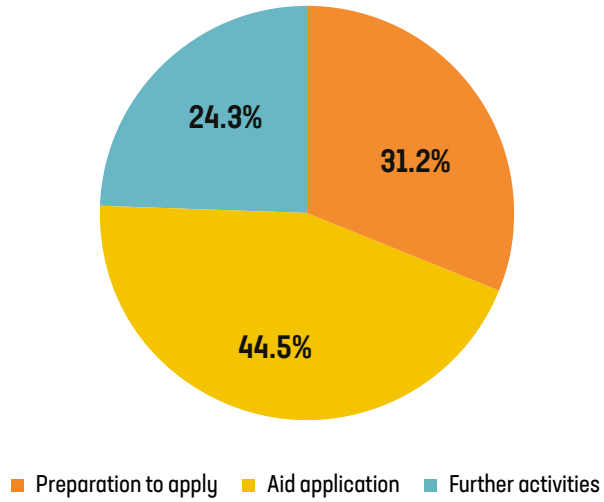
Local Action Groups

Time reported by LAGs spent in administrative activities related to the CAP appears remarkably high compared to other categories surveyed. Survey responses highlight the administrative burden borne by LAGs, categorising the reported time into three main areas: the **application phase**, the **follow-up phase**, and, specific to LAGs, the **management of LAG calls**. The total time spent across all administrative tasks amounts to **225.9 days annually**, although some outliers have been removed from the analysis [169]. Even with the outliers removed, the reported time still appears remarkably high compared to other categories surveyed. LAGs are public-private partnerships that develop and implement **LDS**, with their structures varying across regions and countries, also exhibiting considerable diversity in their composition and size. This diversity means that the time reported for administrative tasks is directly related to the number of individuals involved in each LAG. Consequently, analysing the **share of time** allocated to various administrative activities provides more meaningful insights than absolute time figures. This perspective is particularly important when comparing survey results from LAGs with those of individual farmers or wine producers. This discrepancy could stem from several key factors:

1. **Group size**. The time reported is proportionate to the size of the LAG, which often includes multiple team members contributing to administrative tasks.
2. **Number and size of calls**. The volume and scale of internal project calls managed by LAGs significantly influence their administrative workload.
3. **Core activity of LAGs**. Unlike other CAP beneficiaries, the main purpose of LAGs is intrinsically tied to the **LEADER measures**. As such, a significant portion of their activity focuses on accessing LEADER funding and managing internal calls.

The time spent on aid application, specifically drafting and managing LDS, reflects the central role of LAGs in implementing the LEADER approach. The **application phase** accounts for the largest share of administrative time, representing **49.5**% of the total annual workload. In this category, the most time-intensive activity for respondents appears to be aid application, which involves drafting LDS, collecting evidence, and completing application forms, taking up 44.5% of the application phase. Preparation activities, such as reading the legislation, gathering information, making decisions and other preparatory tasks, account for 31.3% of the application phase. Further activities linked to the application, such as providing additional information and communicating with authorities after submission, account for 24.3% of the application phase.

Figure 33. Time distribution in the application phase among LAGs



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of LAG survey data (N=273 responses)

The **follow-up phase** constitutes **24.3%** of the total administrative time. **Recording and reporting** obligations dominate this phase, accounting for **65.9%** of the follow-up time. This includes preparing evidence of expenditures, drafting payment claims, and fulfilling reporting obligations. **Controls and inspections**, including on-site inspections and follow-up communication with authorities, represent **34.1%** of the total follow-up time.

The survey findings reveal that a significant number of beneficiaries face repeated requests for the same or similar information, which adds to their administrative burden. **40%** of respondents confirmed that they had to resubmit the same type of information multiple times, while **60%** did not encounter this issue. However, the presence of **73 non-responses** suggests that for some participants, the question may not have been applicable, or the processes were not clearly understood. When asked to elaborate on this, respondents affirmed that duplicate information requests are frequent, requiring resubmission of the same documents, such as contracts and financial data, across different stages despite prior submissions. Technical issues with electronic systems, including multiple uploads and manual re-entry, further increase redundancy. The administrative burden is exacerbated by excessive

169 Seven LAGs reported exceptionally high values (>500 days).

documentation requirements and overlapping reporting obligations, forcing beneficiaries to submit the same information in various formats. Paper-based processes add inefficiencies, wasting resources and time through repeated printing and submission. A lack of harmonisation across authorities leads to inconsistent requirements, with information being submitted through multiple channels or in different formats. During audits and controls, beneficiaries face repetitive requests for unchanged documents like financial statements. Approval processes are perceived as cumbersome, requiring repeated clarifications and resubmissions, causing delays and additional effort. Repeated demands for unchanged HR documents, such as work contracts, further divert time from productive activities. Finally, the complexity of reporting requirements adds to the burden, often resulting in confusion, resubmissions and perceptions of excessive bureaucracy.

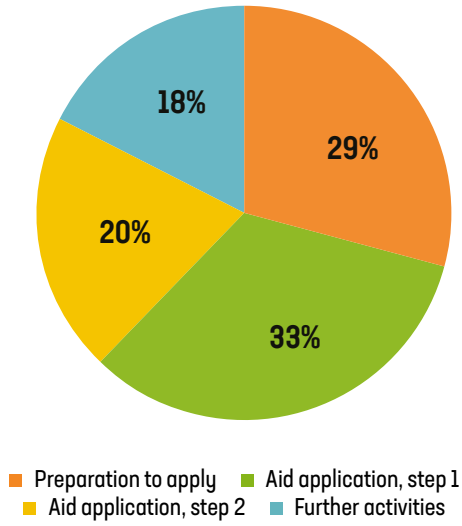
The specificities of the LEADER approach led most LAGs to prefer internal management, with only a small percentage relying on external assistance. Survey data also covered the use of external assistance by LAGs for managing compliance and reporting related to LEADER interventions. Only 26% of respondents (83 out of 381) utilise external assistance [170], such as consultants or advisory services, to manage compliance and reporting tasks related to LEADER interventions. In contrast, a significant majority – 74% (238 respondents) – do not rely on external support, while 60 responses were left unanswered. The survey highlights a range of reasons why a majority of respondents do not rely on external assistance to manage compliance and reporting tasks related to LEADER interventions. This decision is influenced by financial, organisational and programme-related factors, which collectively underscore the preference for internal management of tasks. The decision to avoid external assistance is driven primarily by financial limitations, internal expertise and the perceived inefficiency of outsourcing. Additionally, the complexity of LEADER tasks, coupled with the need for knowledge retention and reliance on collaborative networks, makes internal management the preferred choice for many organisations. While external support can provide value in targeted cases, the findings suggest that most respondents prioritise self-sufficiency, efficiency and cost-effectiveness.

EIP Operational Groups

The diverse structures, team sizes and project scopes of EIP OGs lead to significant variation in the reported time spent on administrative activities. OGs, as key components of EIP-AGRI, bring together diverse stakeholders to collaboratively develop innovative solutions tailored to specific regional needs. However, these groups might encounter significant administrative burdens, particularly when accessing support under the CAP, e.g. under the KNOW intervention. Challenges such as complex reporting requirements and delays in payment processing have already been highlighted in the literature as hindering the efficiency and effectiveness of such bodies [171]. The survey further examined the time spent on administrative tasks by OGs, highlighting the burden during both the application and follow-up phases. It must be noted that interpreting survey results regarding the time allocated to administrative tasks by EIP OGs requires careful consideration of their diverse structures. OGs are collaborative entities comprising various stakeholders, including farmers, researchers and advisors, with significantly varying team sizes based on project scope and regional focus [172]. Given this unevenness, the reported number of days spent on administrative tasks is proportionate to the number of staff involved. Therefore, rather than focusing solely on absolute figures, it is more insightful to examine the proportion of time dedicated to different categories of administrative work.

Survey results show that EIP OGs face similar levels of administrative burden during the application and follow-up phases, with a slight increase in post-approval activities. On average, OGs participating in the survey reported spending an average of **43.4 days annually** on administrative tasks related to accessing CAP support. Of these, 46.1% (about 20 days) is spent on the application phase, while 53.9% (around 23.4 days) is dedicated to follow-up tasks during the **application phase**, OGs face a series of preparatory and submission-related tasks. Preparing for the application, including reading legislation, understanding guidelines and setting up partnerships, accounts for 7.7 days. The preparation of proposals (indicated in the survey as 'Step 1') is the most time-consuming activity, taking 8.7 days and representing 43.5% of the total application phase time. In comparison, drafting project implementation documents (referred to as 'Step 2') requires an average of 5.3 days. Further administrative activities, such as submitting supplementary information and communicating with authorities, add an additional 4.6 days. The breakdown of these activities is visualised in the figure below.

Figure 34. Time distribution in the application phase among OGs



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of OG survey data (N=21 responses)

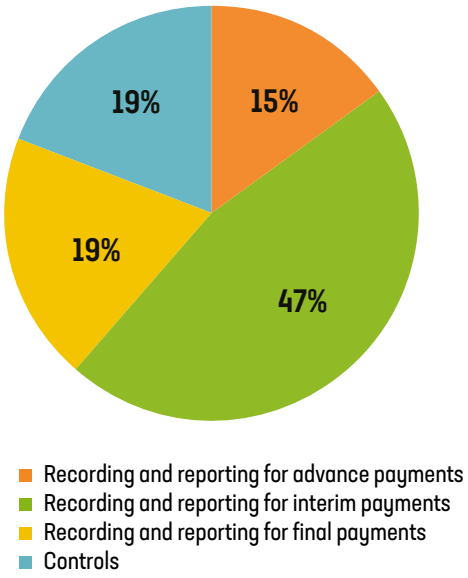
170 The average cost for external assistance is not provided in this case due to the high variability in the data, which is influenced by significant outliers (e.g. values exceeding 100 000). While a cleaned average without outliers reduces the figure, the diverse setup and size of LAGs, as well as the volume and scope of their internal calls, heavily impact the reported costs. This variability makes it challenging to derive a meaningful and representative average cost that would apply across all LAGs.

171 See more at: https://eu-cap-network.ec.europa.eu/publications/cap-evaluation-news-september-2024_en.

172 See more at: https://eu-cap-network.ec.europa.eu/operational-groups_en.

In the **follow-up phase**, the administrative burden of respondents slightly intensifies, with OGs spending more time fulfilling reporting and compliance obligations. The largest proportion of time, 12.5 days (53.4% of the follow-up phase), is spent on interim payment reporting, which involves collecting evidence, drafting payment claims and fulfilling other obligations. In contrast, advance payment reporting takes 4.1 days, while final payment reporting requires 5.2 days. Activities related to controls, such as preparing for inspections and following up on compliance requirements, account for 5.1 days. These tasks highlight the ongoing effort required post-approval, with reporting for interim payments emerging as the single most time-intensive activity across both phases.

Figure 35. Time distribution in the follow-up phase among OGs



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of OG survey data (N=21 responses)

Moreover, approximately 29% of respondents reported having to submit the same type of information multiple times, while 71% did not experience this issue. Examples of repeated reporting include billing documents, status reports, financial spreadsheets in different formats and travel expenses.

OGs report the least frequent use of external advisory services compared to other beneficiaries who also took part in the survey. Only 24% of respondents (eight out of 34) reported using external assistance to fulfil their obligations linked to CAP supports, i.e. through consultants or advisors, to manage administrative and reporting tasks. The majority (47%) do not utilise external support, while 29% left the question unanswered. This may be attributed to their diverse composition, which often includes farmers, researchers, advisors and other innovators who collectively possess substantial expertise in both technical and administrative aspects of project management. Such internal capacity likely reduces their reliance on external advisory services to navigate administrative requirements associated with CAP support [173]. In contrast, individual farmers or wine producers, who may not have immediate access to such a broad range of expertise, might depend more heavily on external advisory services to manage administrative tasks. This is confirmed by OGs' responses in the survey, where the main reasons mentioned by respondents for not using external assistance include:

- sufficient internal expertise and collaboration within networks, which provide the necessary knowledge and support;
- high costs;
- efficiency concerns, as onboarding external consultants can be time-consuming;
- structural independence within groups, which encourages self-sufficiency; and
- lack of funding or limited availability of specialised external resources.

Among those who used external assistance, reported annual costs varied significantly, with individual examples such as EUR 300 and EUR 1 000. However, most respondents were not able to provide cost estimates, partly due to the recent introduction of these services. Most costs were covered as project expenses, although a small portion was privately funded.

Respondents expressed mixed experiences regarding simplified cost options and advanced payment options when it comes to claiming project payments. These simplified cost mechanisms, such as the use of lump sums, flat rates and standard unit costs, are valued for reducing administrative effort and improving efficiency, particularly for personnel expenses and recurring costs like materials or office overheads. Some groups used lump sums for agent and farmer time, which simplified applications and submissions. However, limitations exist, including the inability of standard unit costs to cover actual expenses, particularly for personnel beyond predefined categories. Several respondents also reported that the availability of lump sums was very limited or insufficient to meet project needs. Responses regarding advance payments were evenly split among respondents, with 50% of respondents (12 out of 24) confirming the ability to claim advance payments with the other 50% indicating they did not have this option [174].

Advisory services

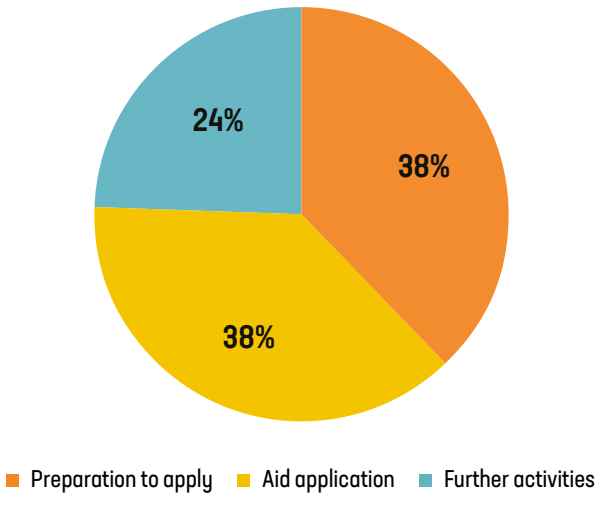
Advisory services face a significant administrative workload under CAP, reflecting their dual role as both beneficiaries of support measures and providers of assistance to farmers. While their primary function is to support farmers and other CAP beneficiaries in navigating administrative and technical requirements, advisory services themselves are often beneficiaries of CAP measures. For example, under the KNOW interventions, advisory services receive support to build their capacities and offer improved guidance to farmers. These interventions ensure that advisors are both equipped to assist farmers and capable of accessing CAP funding independently.

173 See more at: https://eu-cap-network.ec.europa.eu/operational-groups_en.
174 Ten respondents left the question unanswered.

The survey results provide insights into the time spent annually by advisory services on administrative tasks when applying for CAP support, such as through KNOW. Overall, the application phase represents approximately 66% of the total administrative workload (46.9 days out of 70.9 days), reflecting the considerable effort required to ensure applications are complete and compliant. Meanwhile, the follow-up phase, which accounts for 34% of the time, remains essential for maintaining transparency, reporting and compliance. It is important to note that while the results clearly highlight the significant time advisory services spend on administrative tasks related to CAP support, the relatively high values reported – particularly in the application phase – may indicate a potential misinterpretation of the question. It is possible that some respondents included the time they spent assisting **farmers and other beneficiaries** with their CAP applications rather than focusing solely on the time spent on their applications (e.g., KNOW). Given the advisory services' dual role as both **beneficiaries** and **service providers**, this overlap is understandable and suggests the broader administrative workload that advisors manage within the CAP framework.

During the **application phase**, advisory services participating in the survey spent an average of 46.9 days annually preparing, submitting and following up on applications. Looking at individual activities within that broad category, preparation to apply accounts for 17.7 days, covering tasks such as reading legislation, gathering necessary information and making decisions. Aid application requires 17.5 days and includes drafting documents, collecting evidence and submitting application forms. Further activities related to aid applications take up 11.3 days, reflecting additional work after submission, such as providing clarifications, submitting further evidence and communicating with authorities.

Figure 36. Distribution of time spent on activities related to the application phase among advisory services

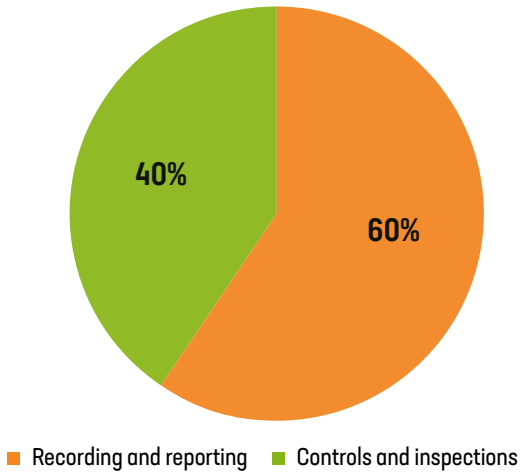


Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N=42 responses)

The **follow-up phase** demands less time overall, averaging 24.0 days annually. This phase focuses on maintaining compliance and ensuring the flow of CAP funds through two main activities. The activity labelled as 'recording and reporting' takes up to 14.3 days and involves obligations to document expenditures, report information and draft payment claims.

On the other hand, controls and inspections account for 9.7 days, covering the preparation of documents for inspections, attending inspections and communicating with inspectors.

Figure 37. Distribution of time spent on activities related to the follow-up phase among advisory services



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of advisory services survey data (N=40 responses)

A significant portion of advisory services beneficiaries face repeated reporting obligations. Almost half (47%) of respondents confirmed they were required to resubmit the same type of information multiple times, while 53% reported no such experience. However, a substantial number of responses (161 out of 212) were left unanswered, which may suggest limited engagement with this issue or varying experiences across participants. The qualitative responses further illustrate the nature of information that beneficiaries are repeatedly required to provide, often accompanied by supporting proofs. Many respondents described instances where electronically submitted documents were later required in physical form for validation, while others noted challenges such as resubmitting data already available in official databases. Technical issues, such as difficulties in interpreting accounting documents or system discrepancies, further compounded the issue. Examples provided by respondents include:

- **Economic and non-economic data**: accounting statements, sales revenue proofs and business plans.
- **Personal data**: account numbers, educational records, personal records, and accompanying documents like diplomas and quotes.
- **Declarations**: employee declarations, ownership documents, affidavits and anti-mafia statements.
- **Procedural data**: surface discrepancies, candidate eligibility forms and accompanying notes for clarification.

Advisory services typically possess the necessary expertise and knowledge to navigate CAP application processes independently. The survey reveals that the majority of respondents (71%, or 36 out of 51) do not rely on external assistance, such as consultants or additional resources when applying for CAP support. Only 29% (15 respondents) reported using such external help. Many responses (161 out of 212 total participants) were left empty, indicating that this question may not have been applicable to all respondents. This result highlights a key characteristic of advisory services, i.e. the fact that they often possess the necessary expertise and knowledge to navigate CAP application processes independently. As professionals who offer this very expertise to farmers and other CAP beneficiaries, advisory services are often well-positioned to manage their applications without the need for external support.

Many respondents emphasised that their organisations are well-structured, with permanent teams and established systems that allow them to handle the work efficiently. Cost concerns also play a role, as external assistance is viewed as expensive and unnecessary, given their internal capabilities. Additionally, while the application process is perceived as **time-consuming and repetitive**, it is not considered overly complex. This finding aligns with data from other surveys, which highlighted that tasks requiring more time are not always viewed as more complex or burdensome. While there is often a correlation between task duration and perceived difficulty, this is not necessarily always the case.

4.2.4. Comparison of estimated administrative costs between programming periods

This section presents the findings of the current study alongside those of the 2019 study on the administrative burden arising from the CAP [175]. However, due to substantial differences in data collection methods, sample composition and analytical approaches, direct comparisons between the two studies are not feasible. These methodological differences limit the scope of drawing definitive conclusions regarding any increase or decrease in the administrative burden for farmers over time, as such comparisons risk leading to biased interpretations. The following provides an overview of the approaches applied in each study, the limitations in comparing their findings and a discussion of the respective results.

Where possible, estimates of administrative costs from the current study were considered in relation to those from the previous study. While the 2019 study focused primarily on administrative costs for managing authorities, it also addressed the costs incurred by farmers. However, the estimates from the previous study were produced at a higher level of aggregation and with a narrower scope than those developed in the current analysis. In particular, the previous study covered five broad categories of administrative tasks [176], whereas the current study provides a more detailed breakdown of activities, as shown in the following table.

Table 19. Comparison with study covering the previous programming period

Previous programming period – administrative burden	Current programming period – administrative burden

› Aid applications
› Record keeping
› Checks of data
› Measurement of land
› Modifications to land areas in IACS
	› Application for CAP support:
	  › Preparatory work
	  › Information collection and recording
	  › Filling in the application
	  › Reliance on external assistance
	› Follow-up activities:
	  › Reporting and documentation

	› Controls

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

175 Analysis of administrative burden arising from the CAP. Available at: https://op.europa.eu/en/publication-detail/-/publication/dabd45ab-9baf-11e9-9d01-01aa75ed71a1.
176 Check data (areas and crops), land areas modification, land measurement, gather and check documents, and fill in aid applications.

While there is some overlap in the types of activities covered, the correspondence between the two studies is only partial. Nonetheless, it can be assumed that the broader categories from the previous study are largely encompassed within the activities assessed in the current analysis.

Both studies apply the **standard cost model** to quantify administrative burden for farmers, using the formula:

Administrative cost = (estimated number of hours spent on administrative tasks × reference hourly wage) + external costs

However, differences in study design, timing and sample characteristics introduce significant limitations to comparability. The previous study was based on 12 in-depth case studies and 122 interviews, whereas the current analysis draws on responses from **21 821 farmers across all 27 Member States** collected through the TC. This variation in data sources, sample sizes and respondent profiles poses challenges for comparing results. Moreover, the absence of longitudinal data tracking the same farmers over time further complicates any direct, like-for-like comparison and makes it difficult to attribute observed differences solely to changes in administrative burden.

Timing is also a factor to consider. The TC was conducted following the start of the new **2023-2027 CAP programming period**, asking farmers to report the time spent on administrative tasks related to their CAP aid applications, including documents for conditionality. Administrative tasks associated with the first year of a new programming period may require more time than in subsequent years, which may have influenced the reported workload.

In addition, differences in cost calculation approaches – such as wage rates, cost assumptions and treatment of outliers – further limit the reliability of direct monetary comparisons between the two studies.

Despite these limitations, some differences in the results can be noted. The previous study reported a **median annual cost of EUR 236 per farmer**, while the current study estimates a **median annual cost of EUR 433**. Reported time spent also increased from a **median of 15 hours** to approximately **28 hours (3.5 working days)**. Preparatory tasks remain the most time-consuming component in both studies, and the share of farmers relying on external support has risen from **43%** to **78%**.

In more detail:

- **Costs** – The previous study found a median annual expenditure of around EUR 236, with most farmers incurring less than EUR 1 000 and an average cost of approximately EUR 220 when excluding outliers. The current study identifies a higher median cost of EUR 433.
- **Time spent** – The median time reported in the previous study was 15 hours, with a range of 0.5 to 350 hours. In the current study, the median is about 28 hours (3.5 working days), and the average time spent is around **56 hours (seven working days)** [177]. This suggests that while many farmers experience moderate administrative demands, some face substantially higher workloads, which influence the average.
- **Distribution of time across tasks** – The previous study found that the five key administrative tasks typically required between five and 11 hours, with application completion accounting for only 13% of the total time. Data checks, land measurements and adjustments to land areas were the most time-intensive activities. The current study reports a similar distribution, with application filling accounting for **14.7%** of the time and preparatory tasks exceeding **75%** of the total workload.
- **Internal costs** – In the previous study, internal costs ranged from EUR 8 to over EUR 7 300, with a median of EUR 178. Around 80% of farmers reported costs below EUR 750, often through outsourcing some administrative tasks. In the current study, the **median internal cost is EUR 313**, with 20% of countries reporting median costs over EUR 700.
- **Use of external support** – Reliance on paid advisory services has increased markedly, from **43%** in the previous study to **78%** in the current one.

Finally, while the findings suggest a higher administrative burden in the current period, methodological differences between the two studies prevent any definitive conclusions regarding trends over time. The results of both studies should therefore be interpreted separately, as they provide complementary insights into the ongoing administrative challenges faced by farmers under the CAP.

177 Taking into account the weighting by farm size, along with the application of different assumptions, the estimated time spent on CAP-related administrative tasks ranges from 5.6 to 8.7 working days per year for farmers.

4.2.5. Research Question 2: conclusions

The TC with farmers and thematic surveys of specific beneficiary categories highlight significant differences in the CAP administrative burden across groups. Farmers incur an estimated **average annual cost of around EUR 1 230**, with **EUR 630** attributed to internal costs and **EUR 600** to external advisory services. They spend an average of **seven working days annually** on administrative tasks, though this varies by farm size and type: smaller farms (<5 hectares) typically spend **one to four days**, while larger farms (>500 hectares) often spend **six days or more**, with field crop and livestock farms reporting higher workloads than horticulture farms. Taking into account the weighting by farm size, along with the application of stricter or more relaxed assumptions, the estimated time spent on CAP-related administrative tasks for farmers ranges from 5.6 to 8.7 working days per year.

Wine growers and producers report spending around 16 days annually on CAP tasks, notably higher than the figure for farmers. This discrepancy may stem from differences in sample composition and methodology, as the survey for wine growers included producers, while the TC focused solely on farmers, including wine farmers. POs in the fruit and vegetable sector report the highest administrative burden among the beneficiaries targeted by this study, reflecting their role as intermediaries managing applications on behalf of multiple members and the wide scope of sectoral interventions. When examining the burden stemming specifically from **sectoral interventions**, POs and wine growers show differences in their time allocation. POs dedicate over 10% of their working time to sectoral intervention, with many finding them significantly more complex than other CAP interventions. At the same time, wine growers participating in the survey reported spending a much higher share of their total CAP-related time on sectoral tasks, which may suggest possible inconsistencies in how respondents estimate their workload or understand sectoral interventions as a component of overall CAP tasks. Moreover, wine growers also show an interesting interplay between time spent and perceived complexity, with sectoral interventions recognised as significantly more complex by respondents dedicating over 10% of their time to these activities. Conversely, those spending less than 5% of their time on sectoral interventions often view them as much less complex, which highlights how sector-specific obligations amplify the administrative burden for wine growers, particularly when tasks demand higher time investments.

LAGs report the highest variation in time spent due to their diverse structures and roles. Their focus on LEADER and LDS demands substantial time commitments, particularly during the application phase, which is their primary focus. EIP OGs show significant variation in administrative burden due to their diverse structures and project scopes while they face similar challenges across application and follow-up phases.

Across all categories, the **application phase** consistently consumes the largest share of time, particularly for POs and LAGs. The preparatory stages, which include gathering information, ensuring compliance and submitting applications, dominate the workload. Although the follow-up phase is less time-intensive, it remains a significant burden for all beneficiaries due to ongoing reporting and compliance obligations.

The **use of advisory services** varies widely among beneficiaries. Advisory services themselves, along with EIP OGs, rely the least on external support due to their in-house expertise. In contrast, farmers, wine growers and POs show greater reliance, with 78% of farmers and a majority of POs utilising external assistance. However, costs for advisory services are notably higher for POs and wine growers, suggesting the complexity of their administrative tasks and the tailored support required for sectoral interventions. For those not using advisory services, common reasons include self-sufficiency, particularly among EIP OGs and advisory services, as well as financial constraints for smaller farms and less resource-intensive LAGs.

Finally, the issue of **reporting the same information multiple times** remains a pervasive inefficiency across all categories. Over 70% of respondents, particularly farmers and POs, reported this problem.

4.3. RQ3: What is the administrative burden stemming from EU-level CAP legislation as compared to the burden generated from different Member States' implementation choices and possible gold-plating?

4.3.1. Description of RQ3

The third research question aims to attribute the administrative burden for farmers and other CAP beneficiaries to its main sources, i.e. whether the burden stems primarily from EU-level CAP legislation or emanates from Member States' implementation choices and practices.

For answering RQ3 the analysis has been developed according to three subordinate questions aimed at covering the different aspects to be examined and, specifically:

RQ3.1: What are the areas of CAP where gold-plating could occur/ occurs and through which mechanisms?

RQ3.2: For the most important areas, how do approaches differ across Member States and what are their implications in terms of burden for beneficiaries? What actions have Member States taken to ease administrative burden for beneficiaries?

RQ.3.3: What other solutions/alternatives could be considered to reduce the administrative burden for beneficiaries?

Sub-question **RQ3.1** refers to 'possible gold-plating' stemming from Member States' implementation choices and practices. Therefore, it aims to identify:

- the main areas of CAP where gold-plating could occur/occurs; and
- the mechanisms through which gold-plating could occur/occurs.

In line with the working definition of gold-plating previously provided (see Section 2.1), the aim is to distinguish the case of the Member State attributed burden between 'necessary' and 'unnecessary' burden (gold-plating). This corresponds, respectively, to burden derived from necessary or essential requirements and conditions and burden from excessive and not strictly necessary requirements and conditions.

Sub-question **RQ3.2** has a two-fold aim to:

- establish the simplification approaches adopted by Member States, taking into account, to the extent possible, strategic choices they made in implementing the new delivery model of CAP;
- identify specific actions taken by Member States to ease administrative burden for beneficiaries.

In both instances (approaches adopted and actions taken), the focus is on the most important areas in which Member States' attributed burden occurs, as identified under RQ3.1. The implications of the adopted approaches and effectiveness of specific actions are considered primarily in terms of their relevance to gold-plating and evidence of positive effects.

Sub-question **RQ3.3** considers solutions that could be introduced by either the EU or Member States with the potential of making a significant contribution towards reducing the administrative burden and related costs for CAP beneficiaries, namely:

- specific solutions targeted to the most important areas where the highest burden occurs;
- or, solutions with potential for burden reduction across different areas (e.g. more digitalisation).

In both instances, the analysis focuses on identifying and highlighting examples of good practices in burden reduction.

As regards possible 'alternatives' that could be considered to reduce the administrative burden for beneficiaries, consideration is given – but not restricted to – to measures with direct burden reduction potential, as well as other complementary measures, such as capacity building, better coordination and cooperation between all actors involved.

4.3.2. Analytical approach

The analytical approach for answering RQ3 is in line with the three research sub-questions presented in the previous section, namely, RQ3.1, RQ3.2 and RQ3.3.

Attribution of administrative burden and gold-plating (RQ3.1)

The analysis follows a **two-step approach** based on the identification of administrative burden under RQ1 (see Sub-section 4.1.3.3): the attribution of burden to source (EU CAP legislation *vs* Member State choices), followed by an assessment of whether a part of the latter (flowing from Member State choices) amounts to gold-plating.

The **first step** of the analysis seeks to attribute the burden to EU legislation or Member States' choices, using the following categories:

i) stemming exclusively / near exclusively from EU legislation;

ii) stemming mainly from EU legislation;

iii) stemming more-or-less equally from EU legislation and Member States' choices;

iv) stemming mainly from Member States' choices;

v) stemming exclusively / near exclusively from Member States' choices.

In addition, the analysis attempts to differentiate between CAP-related legislation and other legislation at both EU and national level, with the aim of identifying more specifically the overall burden directly stemming from CAP legislative framework compared to the burden imposed on CAP beneficiaries by other EU or national regulatory sources.

Scoping interviews with EU level organisations could also contribute towards:

- fine-tuning the above categories (i.e. i to v) to take into account qualitative differences, i.e. not only how much burden comes from EU/Member State sources but also how the responsibility is shared [178];
- selecting for rating the most burdensome areas, from those identified under RQ1, to be rated in terms of origin of burden.

The source of burden is rated by assigning areas of burden to the five categories (i to v) listed above. It is accepted that it may be necessary to reformulate these categories and/or reduce their number in the analysis for a sounder categorisation, e.g. in terms of high/medium/low Member State shares in setting requirements/burden (corresponding to categories iii to v, above). However, it is beyond the scope of this study to attribute quantified shares of administrative costs (assessed under RQ2) to EU level and to Member State level or to CAP and non-CAP legislation.

The analysis is based on an assessment from the point of view of Member States, i.e. through interviews with CSP Managing and Paying Authorities and key stakeholders at Member State level. This evidence is compared with the findings of other data collected from CAP beneficiaries, notably advisory services. It is then triangulated against regulatory provisions and other documentary sources, especially with reference to the new delivery model of the CAP and its implementation.

The **second step** involves an assessment of whether a part of the burden stemming from Member States' choices amounts to unnecessary burden and, hence, it should be regarded as gold-plating, meriting elimination or reduction through simplification.

The assessment focuses on the categories representing a significant share of the burden stemming from Member State choices (iii to v above).

The occurrence of gold-plating is assessed through information collected by:

- interviews with CSP Managing and Paying Agencies and key stakeholders at Member State level on their assessment/justification of the requirements and scope for simplification/reduction;
- interviews with farmers (albeit to a limited extent) [179] and surveys of other CAP beneficiaries and advisory services to obtain their perception of the necessity and reasonableness of requirements;
- documentary reviews for triangulation.

In the case of MAs, PAs and key stakeholders, interviews probe into insufficient simplification in response to the provisions of the CSP regulation [180] and against the factors of success envisaged in CSP evaluation [181]. Questions also reflect the potential sources of gold-plating outlined in Section 3.1.

Simplification approaches, actions taken and potential alternative solutions (RQ3.2 and RQ3.3)

The simplification approach adopted by Member States, together with the main simplification actions (e.g. digitalisation strategies, geospatial/satellite monitoring, standardised cost models, and pre-filled/pre-checked applications etc.), is distilled mainly through an analysis of the CSPs.

An assessment of the overall approach and of specific actions planned or implemented (RQ3.2) is pursued through interviews with CSP Managing and Paying Authorities and key stakeholders with a focus on the most important areas in terms of weight of administrative burden on beneficiaries and incidence of gold-plating. Other inputs, notably documentary reviews are also taken into account [182] for triangulation purposes.

The study seeks to place potential solutions in the context of strategies to alleviate the burden of complying with CAP requirements, such as those identified in farmer interviews, e.g. flexibility tailored to local conditions, stable and clear rules, simplified regulatory frameworks, and enhanced training and advisory services.

Capturing alternative and complementary solutions for burden reduction in addition to simplification measures pursued so far (RQ3.3) is also covered through interviews with CSP Managing and Paying Agencies and key stakeholders, and other inputs, e.g. survey of advisory services.

The main focus of the analyses of simplification and other burden reduction solutions is on identifying and highlighting examples of good practice and exploring issues of transferability.

178 Sometimes EU defines principles or approaches and leaves Member States free to implement; sometimes EU sets a part of the rules and Member States complement with more rules; etc.
179 Farmers' interviews did not cover gold-plating. However, some information on possible gold-plating maybe inferred from farmers' interviews even if it is not an explicit statement of farmers' perceptions.
180 Regulation (EU) 2021/2115, Article 6(3).
181 The costs of the delivery of the CAP Strategic Plan, both for beneficiaries and administrations, that are not strictly necessary to reach policy objectives are minimised. The adoption of simplification measures, including digitalisation, is increasing. https://eu-cap-network.ec.europa.eu/publications/use-factors-success-evaluation_en.
182 Synthesis of *ex ante* evaluations of CAP post 2020, 2023. https://eu-cap-network.ec.europa.eu/publications/synthesis-ex-ante-evaluations-cap-post-2020_en. Simplification measures for farmers, European Commission, SWD(2024) 360 final; Assessing simplification of the CAP for beneficiaries and administrations, EU CAP Network event report, 2025. Assessing simplification of the CAP for beneficiaries and administrations | EU CAP Network.

4.3.3. Analysis of findings

4.3.3.1. Attribution of administrative burden and gold-plating (RQ3.1)

This sub-section considers whether the administrative burden imposed on farmers and other CAP beneficiaries stems from EU level legislation or the implementation choices of Member States. It then proceeds to examine if some of the burdensome requirements or conditions stemming primarily from Member States' choices are excessive and not strictly necessary for the achievement of the CAP objectives and, as such, amount to gold-plating. It builds on the analyses under RQ1 regarding the areas of administrative burden and those assessed as 'most burdensome' [183].

The main sources of data are the interviews conducted at Member State level with MAs, PAs and key stakeholders [184], and the survey of advisory services, backed up by other sources, notably reviews) of literature concerning the new delivery model of CAP and its implementation.

Box 16. Key findings in relation to attribution of administrative burden and gold-plating

Overall, the share of burden stemming from the choices of Member States is significant. The responses of MAs/PAs and advisory services show that 60% or more of the source of burden is attributed to choices for which Member States are regarded as exclusively, mainly or at least equally responsible with the EU level. This applies also to individual areas of burden including those identified as most burdensome, namely 'Direct payments and annual CAP application', 'Rural Development: investment interventions', 'Eco-schemes' and 'Environmental requirements and schemes'.

Regarding the attribution of burden stemming from the EU level to CAP and other legislation, the responses of MAs/PAs and advisory services point to a preponderance of CAP legislation. However, there are several areas of burden where the weight of 'both CAP and non-CAP' together with the smaller 'mainly non-CAP' responses is considerable, especially regarding 'Rural Development: investment interventions', 'Eco-schemes' and 'Environmental requirements and schemes'.

The combination of a large share of burden stemming from Member States' choices and the assessment of MAs/PAs and advisory services that there is a significant scope for burden reduction points to a large part of the conditions and requirements put in place by Member States being excessive or unnecessary for achieving the objectives of CAP and, thus, representing a potentially large amount of gold-plating. This has been amply illustrated by the numerous suggestions for simplification and other burden reduction measures put forward by the contributors to this study.

However, for a number of reasons, the actual scope for burden reduction at CSP level is likely to be more limited in the context of CAP implementation in the current period. A limiting factor is that although some of the simplification suggestions identified represent wide-ranging propositions, most other suggestions have been inspired by specific country experiences and their applicability will need to be considered in the particular context of each CSP.

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

Attribution of the main areas of burden to EU and Member State choices

In the MA/PA interviews, participants were asked to attribute the main areas of burden they had identified (as reported in Sub-section 4.1.3.3) to the main source of burden, namely the choices made at EU or Member State level, or both [185]. The respondents were asked to consider the following categories:

a) burden stemming exclusively/nearly exclusively from EU legislation

b) burden stemming mainly from EU legislation

c) burden stemming more-or-less equally from EU legislation and Member States' choices

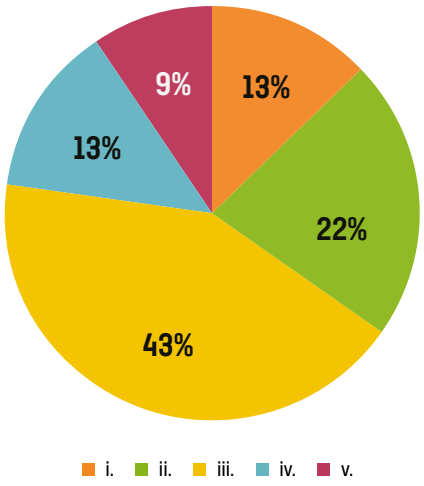
d) burden stemming mainly from Member States' choices

e) burden stemming exclusively/nearly exclusively from Member States' choices

The figure below presents an overall picture which shows that the largest share of responses (43%) consider that the burden stems more-or-less equally from EU legislation and Member States' choices. A further 35% consider that it stems mainly or exclusively from EU legislation and 22% mainly or exclusively from Member States' choices.

183 It is beyond the scope of this study to attribute quantified shares of administrative costs (assessed under RQ2) to EU level and to Member State level or to CAP and non-CAP legislation.
184 Referred also as 'MA/PA interviews' for brevity.
185 Q5: Do you consider that the main areas of burden you have indicated in Q1 stem from the choices made at EU or Member State level, or both?

Figure 38. Origin of burden (EU legislation or Member State choices)



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data
(N=144 responses, including multiple responses and excluding responses left blank)

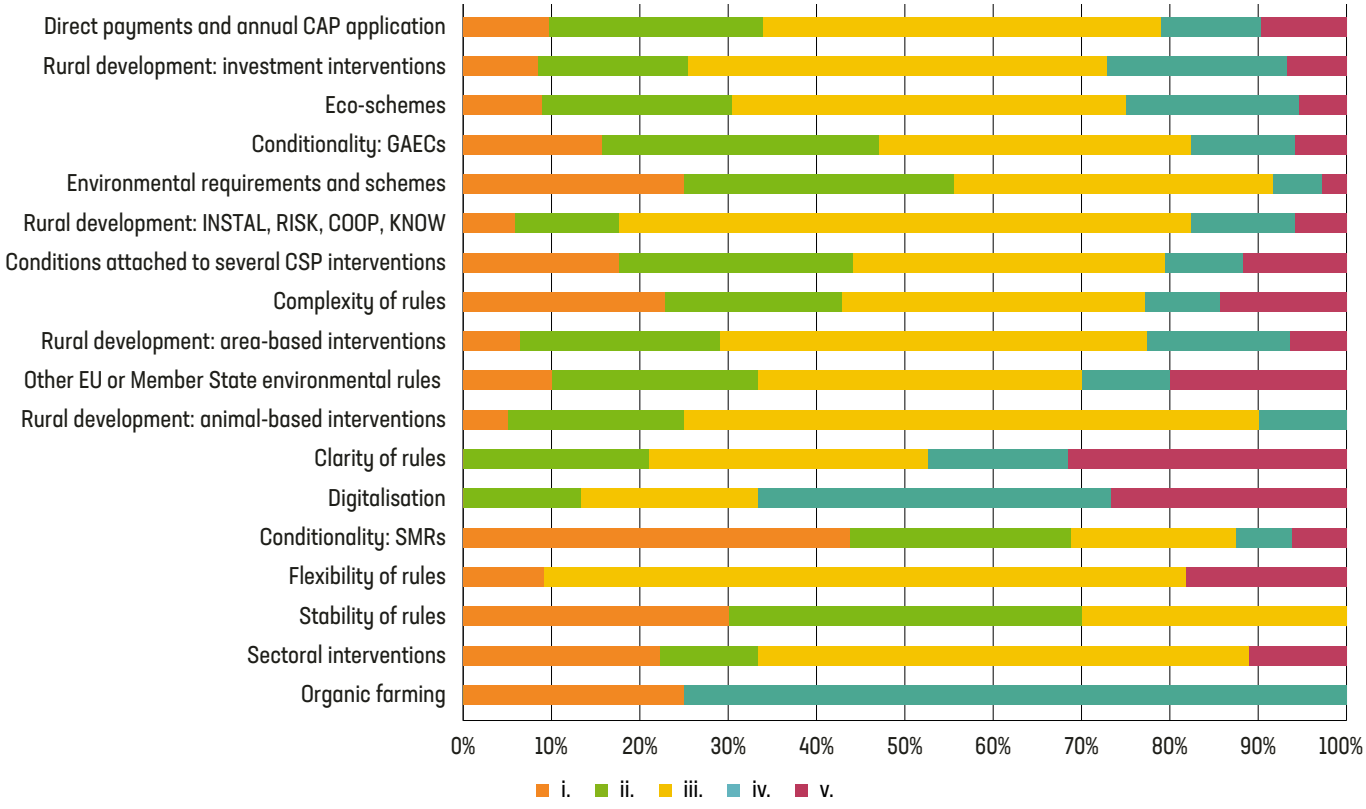
The areas assessed as most burdensome in Section 4.1.3.3 tend to have a high share of burden stemming mainly or exclusively from Member States' choices or more-or-less equally from EU legislation and Member States' choices – see the figure below. For instance, in the case of the top four areas of burden, the total share of responses in these three categories ranges from 53% to 75%, as follows:

- Direct payments and annual CAP application: 66.1%
- Rural development: investment interventions: 74.6%
- Eco-schemes: 69.6%
- Conditionality: GAECs: 52.9%

Among the other categories of burden identified in Section 4.1.3.3, there are several with a major share of burden attributed to Member States' choices, notably:

- Organic farming: 100%
- Rural development: other interventions (e.g. INSTAL, RISK, COOP, KNOW): 82.4%
- Rural development: animal-based interventions: 75%
- Sectoral interventions: 66.7%.

Figure 39. Origin of burden (EU legislation or Member State choices) by area of burden



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data, N=144 (including multiple responses and excluding responses left blank)

The equivalent question in the advisory services survey [186] elicited similar responses [187], as shown in the table below. The 'more-or-less equally' category (iii) predominates and when it comes to the combined 'exclusively/mainly' categories (i/ii and iv/v) the respondents consider a higher share of burden to stem from the EU level (35-39%) than from Member States (19-22%).

186 Q20: Based on your knowledge and experience as an advisory service, how does the burden stemming from EU legislation (both CAP rules and other legislation) compare to the burden stemming from the national level choices related to the implementation of CSPs?
187 Excluding 'don't know/cannot distinguish between the two', which represented a much higher share in the case of the advisory services survey (28%).

The last point might be seen as a perception from the Member States' perspective that underestimates the high degree of discretion allowed to Member States in the new delivery model of the CAP. This has been extensively analysed and documented, albeit not from a quantitative perspective, in the literature covering the new delivery model of the CAP which is regarded as "a completely new model of CAP governance characterised by less detailed rules and more attention to performance, which implies a greater freedom of action or each Member State, but also greater responsibility" [188]. The high degree of discretion afforded to Member States raised concerns at the stage of the adoption of the CAP reform, such as those expressed by the European Parliament regarding a "risk of 'renationalisation' and the ability of the Commission to ensure a good degree of coherence in the CAP as a European policy" [189], while the outcomes of the greater flexibility in the CAP were seen as being dependent "on the capacity and benevolence of national governance systems" [190].

Reviews of the way the Member States implement the new delivery model have noted that "when designing the CSPs, Member States were free, within certain boundaries and limitations as imposed by the common legal framework, to decide which interventions to implement to meet the needs identified. Member States also had considerable flexibility to decide how to implement these interventions, since for several interventions numerous implementation choices of great relevance to the overall implications of the plans had to be made" [191]. It has also been noted that although "regulatory constraints limit the margins of manoeuvre of MSs, ... some of them move to voluntarily go beyond minimum commitments ... [and] these choices are related to the national context in which the CAP operates" [192].

Table 20. Comparison of the assessment of the origin of burden (EU legislation or Member States' choices) by MAs/PAs and advisory services

		MAs/PAs (%)	Advisory services (%)
i.	Burden stemming exclusively/nearly exclusively from EU legislation	13	5
ii.	Burden stemming mainly from EU legislation	22	34
iii.	Burden stemming more-or-less equally from EU legislation and Member States' choices	43	42
iv.	Burden stemming mainly from Member States' choices	13	17
v.	Burden stemming exclusively/nearly exclusively from Member States' choices	9	2

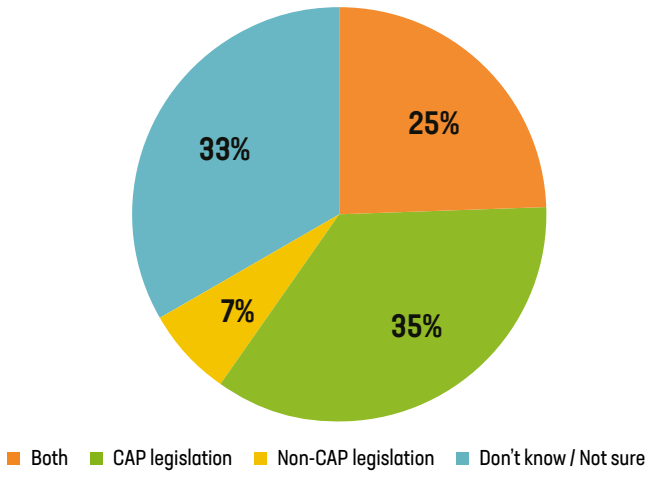
Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data (N=144), and advisory services survey data (N=157, excluding responses left blank and 'Don't know/Cannot distinguish between the two')

Therefore, a key finding, fully supported by the literature review, is that the overall share of burden stemming from the choices of Member States is significant, as reflected in the responses of MAs/PAs and advisory services which show that 60% or more of the source of burden is attributed to choices for which Member States are regarded at least equally responsible with the EU level.

Attribution of burden stemming from the EU level to CAP and other legislation

In the case of burden attributed to EU level legislation, MA/PA respondents were also asked if, in their opinion, 'the burden stems mainly from the CAP legislation or other non-CAP EU legislation' (Q6). Only 7% attributed the burden mainly to non-CAP legislation as against 35% who thought that it was due to CAP legislation, while 25% attributed the burden to both CAP and non-CAP legislation. It is noteworthy that a large share of respondents (33%) were not in a position to judge.

Figure 40. Attribution of burden stemming from EU level to CAP and non-CAP legislation



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data (N=144, including multiple responses)

188 Paolo De Castro et al., *The Common Agricultural Policy 2021-2027: a new history for European agriculture*, REA 2021.
189 Martinos, H. et al., *Governance: the reform process of the CAP post 2020 seen from an inter-institutional angle*, European Parliament 2022.
190 Lovec, M. et al., New CAP Delivery Model, Old Issues, *Intereconomics*, 2020.
191 European Commission, Mapping and Analysis of CAP Strategic Plans: Assessment of joint efforts for 2023-2027, 2023.
192 Cagliero R. et al., *The Common Agricultural Policy 2023-2027. How member states implement the new delivery model?*, REA 2023.

Although the responses clearly point to a preponderance of CAP legislation, there are several areas of burden where the weight of 'both CAP and non-CAP' together with the smaller 'mainly non-CAP' responses is considerable (see figure below). For instance, it exceeds or is similar to the weight of 'mainly CAP' responses in the following areas assessed as most burdensome in Section 4.1.3.3:

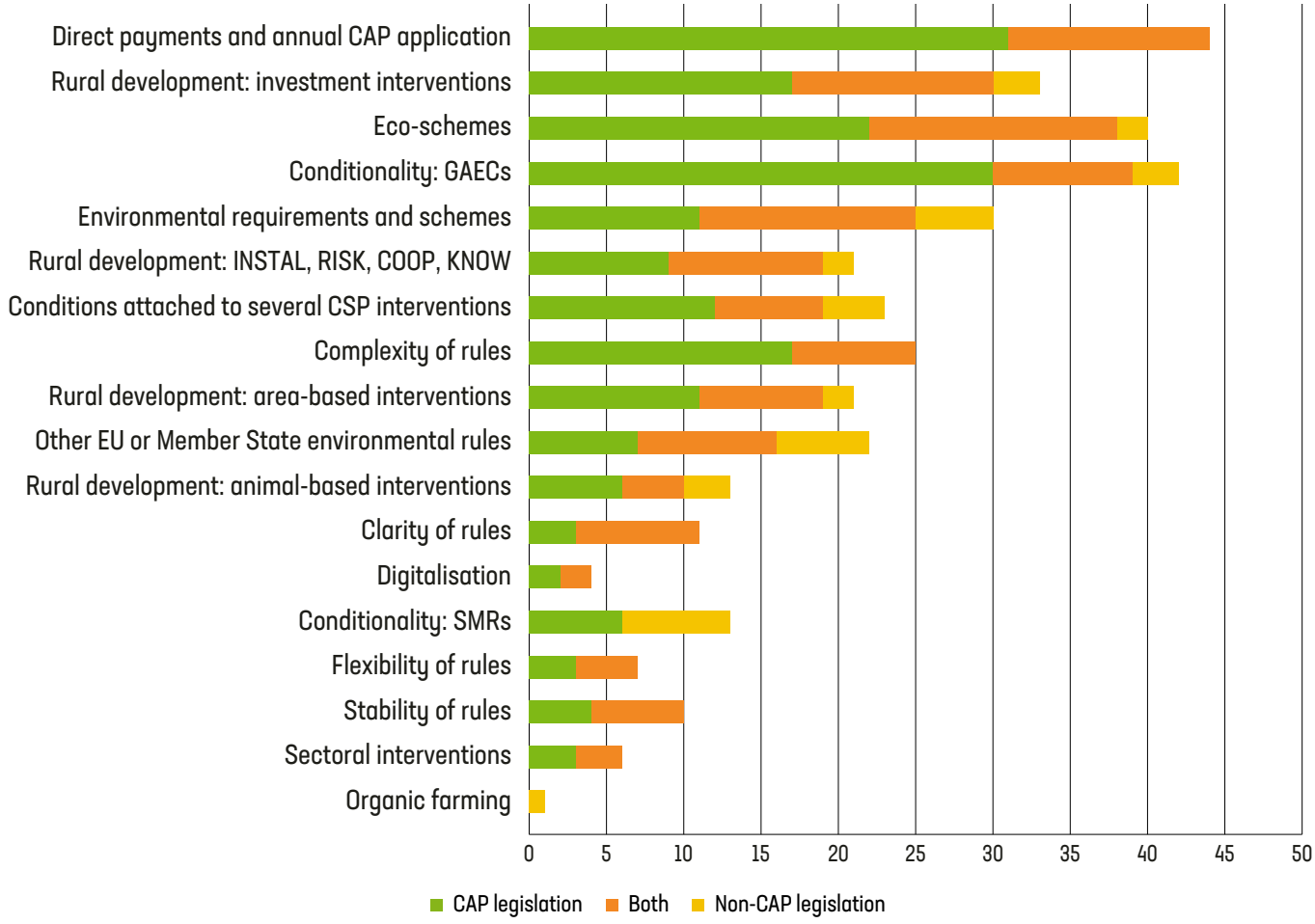
- rural development: investment interventions
- eco-schemes
- environmental requirements and schemes

Likewise, considerable weight is attached to non-CAP legislation in other areas of burden, such as:

- rural development: area-based interventions
- rural development: other interventions (e.g. INSTAL, RISK, COOP, KNOW)
- conditions attached to several CSP interventions
- other environmental rules arising from EU or national legislation

Overall, the respondents' perception of the CAP/non-CAP split in EU legislation as a source of administrative burden may be underestimating the latter. For instance, in the case of SMRs, the respondents have attributed similar amounts of burden to CAP and non-CAP burdens, although these requirements apply to all farmers whether or not they receive support under CAP. Also, the scoping interviews have shown that EU level organisations place considerable weight on the burden of non-CAP legislation [193].

Figure 41. Attribution of burden stemming from EU level to CAP and non-CAP legislation (by area of burden)

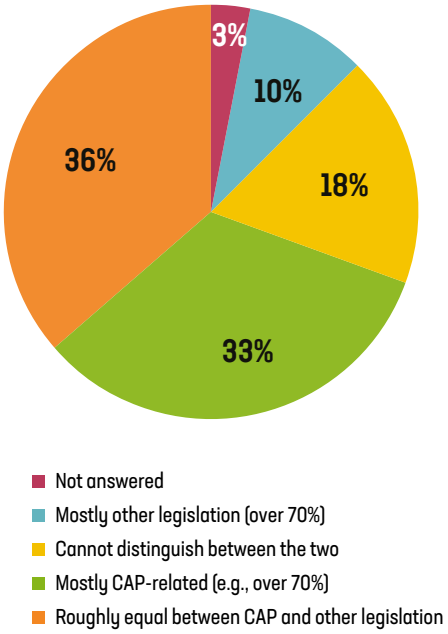


Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data (N=144, including multiple responses and excluding responses left blank and 'Don't know / Not sure')

193 In the 'Copa and Cogeca proposals for the Simplification of the Common Agricultural Policy and related policies' (20 February 2024) the extent of the proposals 'Outside the CAP framework' exceeds those 'Under the CAP framework'.

An equivalent question posed in the advisory services survey [194] provided a similar picture with only 10% attributing the burden mainly to non-CAP legislation and 33% mainly to CAP legislation, while 36% thought that CAP and non-CAP legislation were roughly equal as sources of administrative burden (the remainder 21% mostly stated that they could not distinguish between CAP and other legislation).

Figure 42. Comparison of burden under CAP rules with burden stemming from other obligations to farmers



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

MA/PA participants who attributed the burden mainly to non-CAP legislation or roughly equally to CAP and non-CAP were also asked which legislation was the source of the burden. The main themes identified by the respondents were the following:

1. **Environmental legislation**:
   - water management (e.g. EU Water Framework Directive)
   - pollution control, particularly nitrate pollution (EU Nitrates Directive)
   - protection of habitats and biodiversity (e.g. Natura2000, EU Birds and Habitats Directives)
   - climate and environmental sustainability requirements under Green Deal objectives
2. **Animal welfare and veterinary standards**:
   - directives on the welfare of farm animals (e.g. Council Directive 2008/119/EC and 2008/120/EC)
   - regulation of veterinary products and prohibition of hormones
3. **Food and feed safety**:
   - regulations concerning food hygiene and biocides
   - directives addressing feed safety and plant protection products
4. **Administrative and compliance requirements**:
   - statutory management requirements
   - public procurement laws and state aid rules
   - cost implications for small farms, particularly for infrastructure upgrades and compliance (e.g. manure storage, pesticide application)
   - restrictions due to land designations (e.g. SACs, SPAs under Natura 2000) [195]

The non-CAP legislation, **most commonly identified** as a source of administrative burden for CAP beneficiaries, is as follows:

- **EU Water Framework Directive**: frequently mentioned for its stringent requirements affecting irrigation and water quality management.
- **EU Nitrates Directive**: highlighted as a significant burden due to its strict pollution control measures.
- **EU Habitat and Birds Directives**: referenced as sources of complexity in managing protected areas.
- **Animal welfare regulations**: regularly cited as adding layers of compliance for livestock management.
- **Public procurement legislation**: identified for complicating project funding and execution.

194 Q19: Based on your knowledge and experience as an advisory service, how does the burden under the CAP rules compare to the burden stemming from other obligations farmers are subject to (including environment/sanitary and other)?

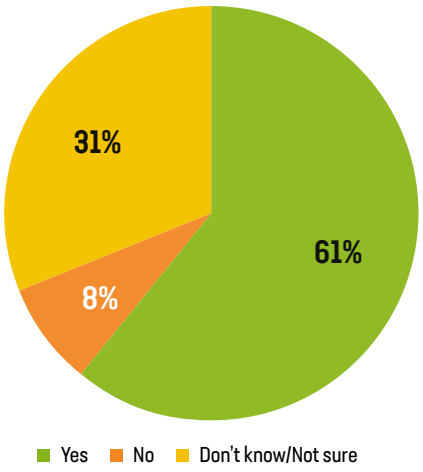
195 Special Protection Areas (SPAs) are designated under the Birds Directive, while Special Areas of Conservation (SACs) protect habitats and species listed under the Habitats Directive.

Gold-plating and potential for reduction

The working definition for gold-plating, as in Section 3.1, defines **gold-plating** as **"Member State imposed obligations that go beyond what is envisaged in the legislation and are not strictly necessary for the achievement of the objectives of the CAP"**. In order to establish the extent to which requirements that have been assessed as burdensome in this study are considered to be 'excessive' or 'unnecessary', and therefore represent potential gold plating, MA/PA interviewees were asked if they think that there is scope for reduction of burden in areas of burden stemming from their country's implementation choices [196].

A majority of respondents (61%) believe that there is scope for reduction of burden and only 8% think otherwise, with a large share not in a position to judge (31%).

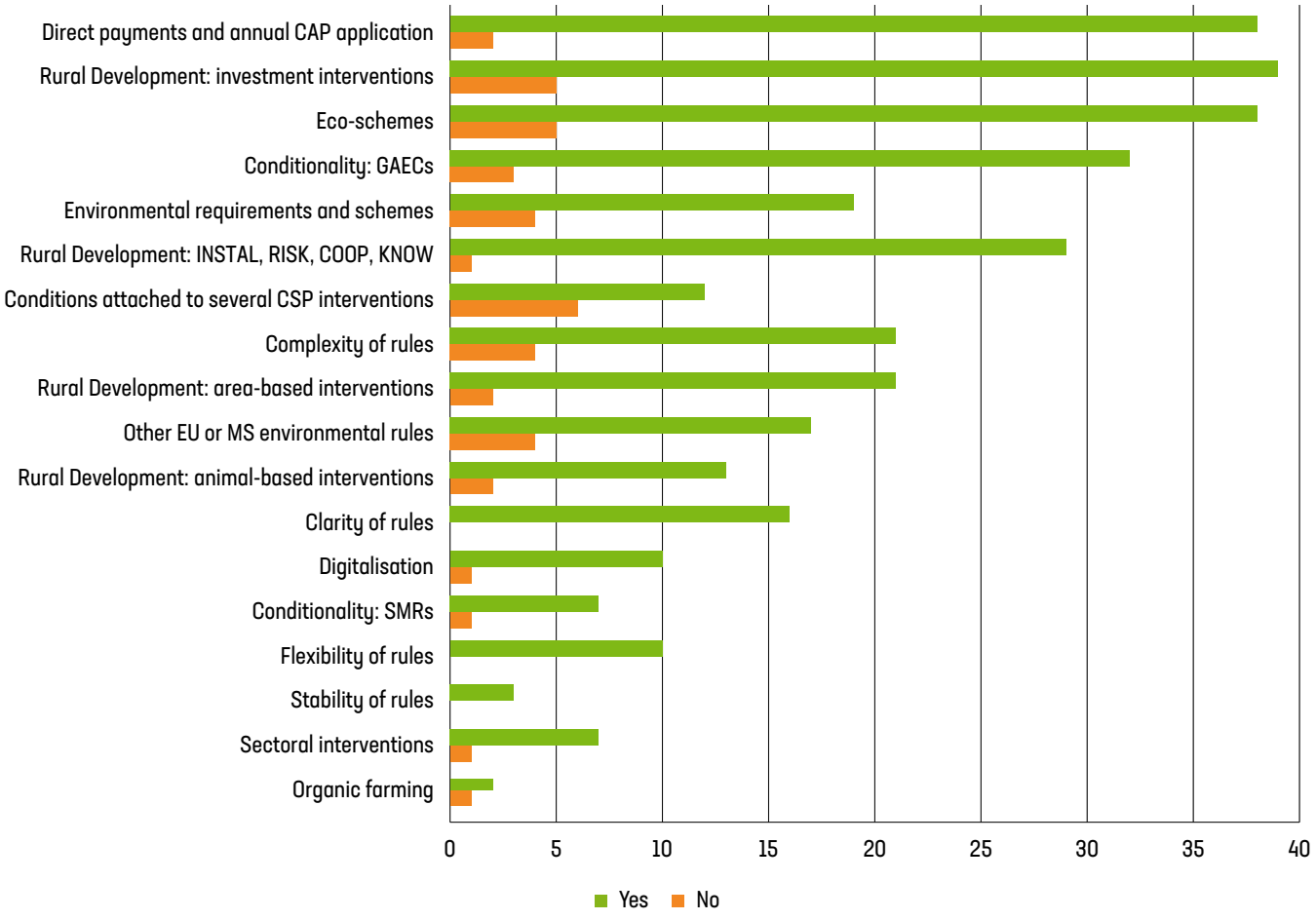
Figure 43. Scope for reduction of burden stemming from Member State choices



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data (N=144 including multiple responses)

The significant scope for burden reduction applies across the areas of burden identified in this study, as illustrated in the figure below.

Figure 44. Scope for reduction of burden stemming from Member State choices by area of burden



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of MA/PA interviews' data (N=144 including multiple responses)

196 Q10: For the CAP areas of burden stemming from your country's implementation choices, do you think there is scope for reduction of burden?

MA/PA participants who identified the scope for burden reduction were further asked to describe possible solutions [197]. The most common themes addressed by the suggestions made by the respondents can be distilled as follows:

- improved digital tools and systems, integration and interoperability;
- clarity, simplicity and flexibility in rules and conditions;
- simplification of procedures and reporting; and
- enhanced advisory and support services.

A large number of broadly ranging qualitative responses were obtained and have been reviewed with reference to the most burdensome areas identified in this study, highlighting the considerable extent of the perceived scope for burden reduction. A number of examples are included in Box 17 below.

An equivalent question [198] posed in the advisory services survey, elicited similar responses to the above regarding the areas of burden that could be simplified. Some of the responses underlined largely procedural improvements as in the responses of MAs/PAs, such as:

- **Documentation simplification**
  - Consolidate records into a single, unified database to avoid repeated submissions.
  - Eliminate requirements for unnecessary paperwork, particularly for small-scale interventions.
- **Modernised digital tools**
  - Develop intuitive, user-friendly platforms for data entry and compliance monitoring.
  - Phase out unreliable technologies like geotagged photos and satellite monitoring, replacing them with better-integrated systems.
- **Improved communication and training**
  - Provide clearer, more accessible guidance for farmers and advisors.
  - Invest in training programmes to help beneficiaries understand and comply with CAP requirements.
- **Streamlined payment systems**
  - Introduce faster payment processing and advance payment options to reduce financial strain on farmers.
  - Simplify investment aid procedures by reducing pre-application documentation.

Other suggestions coming from advisory services respondents delved into substantive aspects, such as:

- **Equity in aid distribution**
  - Revise scoring criteria and eligibility conditions to better support small and niche farms, as well as agroecological practices.
  - Simplify eco-schemes to encourage broader participation.
- **Flexible and proportionate standards**
  - Introduce proportional penalties and compliance requirements based on farm size and risk.
  - Adapt regulations to local conditions, including climate and farming practices.

The evidence obtained from MAs/PAs and other sources, on the one hand, attributes a large part of the identified administrative burden imposed on CAP beneficiaries to Member State implementation choices and, on the other hand, indicates that there is significant scope for reducing this burden through simplification and other complementary measures. Therefore, the evidence suggests that a significant portion of the conditions and requirements imposed by Member States are excessive or unnecessary for achieving the objectives of the CAP. This represents a potentially huge amount of gold-plating and has been amply illustrated by the numerous suggestions for simplification and other burden reduction measures put forward by the MAs/PAs themselves and other contributors to this study.

However, the actual gold-plating and the scope for burden reduction at Member State level would be more limited in the context of CAP implementation during the current period for a number of reasons.

First, some of the suggested simplification actions encroach on CAP objectives and EU level legislation. Examples, at a high level, include the questioning of social conditionalities or the green architecture of the CAP or, at a more specific level, involve suggestions to combine multiple premiums under agri-environmental programmes into a single investment subsidy to reduce the number of small-scale measures or advocate the introduction of mutual funds (e.g. for crop damage) through contributions deducted from subsidies.

Second, some other suggestions, albeit regarding the Member State level, concern the transposition of non-CAP legislation into national legislation, e.g. public procurement, and therefore are beyond the scope of CAP simplification actions or other purely national or local level regulations e.g. streamlining the permissions process for construction and other investments to reduce wait times and paperwork.

Third, the practicality of the suggested solutions has limitations as in many cases they are either vague or simply amount to a reverse statement of the problem encountered by beneficiaries, e.g. 'delays in finalising the control and authorisation of the aid should be overcome' or 'solve IT problems'. In this respect, it is worth noting the significant rates reported above on the inability of respondents to distinguish between CAP and non-CAP legislation [199].

197 Q10.1: If there is scope for burden reduction, could you please briefly describe the possible solutions?
198 Q24: Based on your knowledge and experience as a provider of advisory services, what areas of administrative burden for farmers and other CAP beneficiaries (e.g. burdensome interventions and requirements) could be simplified, and how?
199 Likewise, in the responses to the advisory services survey questions: Q17 (In your experience, to what extent are farmers and other beneficiaries aware of the difference between administrative burden imposed directly by CAP requirements and those arising from other legislation at EU/national level (e.g., SMRs, such as the Nitrates Directive)?) and Q18 (In your experience, to what extent are farmers and other beneficiaries aware of the difference between administrative burden imposed by EU legislation (including both CAP requirements and other EU legislation) and national rules related to the implementation of CAP Strategic Plans (CSPs)?).

Fourth, notwithstanding the general validity of individual solutions, their applicability needs to be examined in the specific institutional and administrative context of each Member State. This is further considered in the following sub-section, within the context of simplification approaches pursued by Member States and good practices.

Lastly, a limiting factor is the number and range of changes that can be introduced during the implementation of the CSPs without intensifying horizontal issues such as stability of rules and beneficiaries' awareness or otherwise compromising the effects of interventions [200].

Nonetheless, the extent of gold-plating and the scope for a reduction in administrative burden at Member State level remains considerable, as illustrated by the potential solutions presented in the box below, as well as the simplification measures which are being implemented and have been recently introduced. It should, however, be stressed that although some of the simplification measures represent wide-ranging propositions, most other suggestions have been inspired by specific country experiences and their applicability will need to be considered in the specific context of each CSP, as highlighted in the fourth point above.

Box 17. Examples of burden reduction suggestions regarding selected areas of burden

Direct payments and annual CAP application:

- The number of required documents for the income support intervention under Bulgarian CSP can be reduced. For example, only info for quantity of sold production could be required and not the description of all invoices/sales records. The invoices could be checked on the on-the-spot-control on the farm. Also, the minimum quantity of sales could be reduced (BG).
- Expanding the 'need-to-know' approach, where only essential information is collected and enabling a more automated data-gathering system would ease the application load on beneficiaries. Additionally, pre-filled or partially completed forms could streamline the process (MT).
- We should re-examine the definition of an 'active farmer' (SI).
- Introduce a tiered or proportional compliance system, where the requirements are scaled based on the size of the farm (SK).

Rural development: investment interventions:

- Rural development: investment interventions – where possible, use simplified cost options, create a common cost list at the level of all interventions, do not focus on justifying invoices and reduce the scope of data collected from farmers. Part of the data can be pulled from available databases (HR).
- Wider application of simplified cost options, more flexibility for the Member States to choose which requirements apply to specific interventions (to reduce burden related to justification of market prices) (LT).
- In the case of investment applications, the number of supporting documents could be reduced in the case of small farmers. For them, a simplified application system should be elaborated (HU).
- One of the simplification measures is the possibility of setting up advance payment systems, which would reduce the financial pressure on beneficiaries while simplifying procedures for them (FR).
- Investments requirements: Streamlining the permissions process for construction and other investments by coordinating with local authorities to reduce wait times and paperwork could make these requirements less burdensome for farmers, encouraging greater participation in investment opportunities (IE).

Eco-schemes:

- For eco-schemes 4 and 5, more flexibility with regard to the committed period and mitigation of sanctions (IT).
- Select key issues and enable farmers to receive premiums more quickly (LU).
- Slovenia defines the percentage of reimbursement of expenditure. These should be higher (SI).
- When it comes to defining eco-schemes, they should be more homogeneous and simpler (e.g. biodiversity areas imply requirements that go beyond reinforced conditionality) (ES).

Conditionality – GAECs:

- Review and improvement of the data basis for the conditionality provisions, in particular for GAEC 4 and GAEC 2. Revision of the period for GAEC 6 (minimum ground cover) taking into account agricultural practices (AT).
- GAEC 6: set rules that are applicable on the field (BE-WA).
- Conditionality requirements (GAECs): providing clearer guidance materials, such as instructional videos or animations, could help farmers understand compliance requirements without needing to rely heavily on advisors. This could reduce the administrative burden related to interpreting complex conditionality rules (IE).
- GAEC 4: solutions would require a change of the water act. If the EU legislation prescribes a buffer strip of three metres as sufficient, why is it stricter in Slovenia? The prohibition on ploughing is a matter of change for the national regulation on conditionalities. It is assumed that such a change would open an issue of controls (SI).

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), selection of examples based on open text responses of interviews with MAs/PAs

200 "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". *Assessing simplification of the CAP for beneficiaries and administrations*, EU CAP Network event report, 2025, https://eu-cap-network.ec.europa.eu/publications/assessing-simplification-cap-beneficiaries-and-administrations_en.

4.3.3.2. Simplification approaches, actions taken and potential alternative solutions (RQ3.2 and RQ3.3)

This sub-section outlines the simplification approaches established in the CSPs. It then proceeds to consider simplification in practice, i.e. the implementation and achievements of simplification measures taken by the EU and Member States since the adoption of the CSPs. It also examines complementary and alternative measures to simplification that can contribute to a reduction of administrative burden on CAP beneficiaries. It concludes by summarising good practices in simplification and burden reduction approaches and measures at EU level.

The main sources of data are the interviews conducted at Member State level with MAs, PAs and key stakeholders [201] and the survey of advisory services, backed up by other findings (notably scoping interviews with EU level organisations and documentary reviews) [202].

Box 18. Key findings in relation to simplification approaches, actions taken and potential alternative solutions

Regarding the simplification approaches in the adopted CSPs, digitalisation and e-governance tend to have a central position across Member States, while other themes are also prominent in the approach of different groups of Member States, notably, simplified cost and evidence submission, harmonisation and streamlining, flexible and transparent monitoring, and enhanced training and support.

The European Commission initiated a package of simplification and other related measures in February 2024. Overall, these measures have been met with a mix of optimism and scepticism from MAs/PAs. While they address specific burdens and offer notable relief in some areas, challenges related to timing, communication, and uneven impact persist. The main positive impacts were seen in connection with GAECs and small farms.

Regarding the implementation and achievements of measures planned in the CSPs, the main insights gained from MAs/PAs and advisory services reveal that simplification efforts are broadly focused on reducing redundancy and streamlining processes by using various tools. The most common answers regarding positive effects concerned solutions based on digital tools and automation, simplified cost options and support for small farms. However, many respondents were unaware of implemented actions or noted minimal impact.

Insights obtained from MAs/PAs and advisory services into complementary measures that could reduce the administrative burden borne by CAP beneficiaries, have stressed the importance of training and capacity building, better coordination and communication, and strengthening of advisory services. They have pointed to the value of a proactive communication strategy, feedback loops, and a cultural shift emphasising support and education over enforcement and penalties.

On good practice, awareness of simplification or complementary measures implemented in other countries is limited to just over half of MAs/PAs and much less among advisory services. Respondents were able to identify good practices in simplifications that are mostly focused on digitalisation and in harmonising and streamlining measures, as well as on effective dialogue between Member States and beneficiaries, and advisory support. They also highlighted the need for better sharing of information on experiences and good practices across EU countries.

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

Simplification approaches

Member States have set out in their CSPs a range of strategies to achieve administrative simplification. An analysis of CSPs [203] has identified commonalities across the approaches adopted, with several prevalent themes highlighted below.

1. Digitalisation and e-Governance
   - **Unified platforms**: many countries, including Austria, Belgium and Bulgaria, are adopting centralised digital platforms for application submission, tracking, and communication. These systems often integrate with public databases to pre-fill forms and reduce repetitive data entry.
   - **Geospatial and satellite monitoring**: utilising satellite imagery (e.g. Sentinel data) and geo-referenced tools to reduce on-site inspections and improve compliance checks, as seen in countries like Finland, Denmark and Croatia.
   - **Mobile apps and portals**: tools like Estonia's e-ARIB and Denmark's 'Tast Selv' aim to provide interactive, user-friendly interfaces for farmers to manage applications and receive updates.
   - **Paperless administration**: countries like Cyprus and Czechia emphasise fully electronic communication, application, and documentation processes, aligning with broader environmental and efficiency goals.

201 Referred also as 'MA/PA interviews' for brevity.

202 Including: *Synthesis of ex ante evaluations of CAP post 2020*, EU CAP Network, 2023; *Simplification measures for farmers*, European Commission, SWD(2024) 360 final; *Assessing simplification of the CAP for beneficiaries and administrations*, EU CAP Network, 2025, https://eu-cap-network.ec.europa.eu/publications/assessing-simplification-cap-beneficiaries-and-administrations_en.

203 Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), analysis of Chapter 3.9 of the CSPs.

2. Simplified cost and evidence submission

   - **Standardised costs**: adopting lump sums or standard rates (e.g. for labour, overheads, and investments) to streamline cost verification.
   - **Automation of proofs**: integration with external databases for automated verification of eligibility and compliance, minimising the need for beneficiaries to submit additional documentation.

3. Harmonisation and streamlining

   - **Unified application processes**: aligning application periods and conditions across multiple interventions to reduce complexity for beneficiaries, as implemented in Austria and Belgium.
   - **Simplified schemes**: abolishing complex systems like payment entitlements (Austria, Denmark) and reducing the variety of intervention measures.

4. Flexible and transparent Monitoring

   - **Early warning systems**: alerts about non-compliance or required actions, as seen in Croatia and Finland, enable timely corrections.
   - **Reduction of physical inspections**: leveraging digital and satellite-based systems to reduce manual oversight, as pursued widely across Member States.

5. Enhanced training and support

   - **Guidance for beneficiaries**: proactive education, such as Estonia's pre-filled forms and Finland's electronic guidance, helps reduce errors and improve application quality.
   - **Stakeholder engagement**: involving beneficiaries and experts during the planning and implementation phases to create practical and user-centric solutions.

Among the different constellations of the themes outlined above, digitalisation and e-governance tend to have a central position, practically across the board, while other themes are also prominent in the approach of different groups of Member States. The importance attached to digitalisation has also been highlighted in the synthesis of the ex ante evaluations of the CSPs, which noted that "all the evaluators [...] confirmed that the CSPs were promoting the simplification and reduction of administrative burden fairly well through digital application systems. The majority of CSPs mentioned the use of digital tools and applications to simplify and reduce administrative burdens at different stages of the applicant-agency interface" [204].

Although the ex ante evaluations assessed the overall simplification efforts of the CSPs positively, they also drew attention that "further development was needed to ensure adequate reductions in administrative burden". Especially, concerns were raised about the extent of simplification achieved through the CSPs' measures as details regarding implementation were yet to be defined in guidelines and instructions [205].

Simplification in practice: EU level

The above outlined approaches need to be seen in light of what has been implemented so far in this CAP period by simplification measures pursued at different levels.

At EU level, the European Commission put forward a package of simplification and other related measures in February 2024. They encompassed simplification to some of the conditionality requirements, especially exemptions on rules on land lying fallow (GAEC 8) and rules changes on GAEC 1 regarding the requirement to keep areas of permanent grassland in the EU stable since the reference year 2018. Other changes concerned the methodology for certain checks, aiming to reduce the number of on-farm visits by national administrations by up to 50%, clarification of the use of the concept of *force majeure*, and exceptional circumstances and measures to ease burdens for smaller farmers. The implementation of this simplification package was at CSP level. In December 2024, the Commission reported on the overall state of its implementation. The conclusions stated that "It is expected that the simplification package should help reduce paperwork, gain time, and increase flexibility in how farms are managed. This should lead to positive **effects not only on farmers' finances** but also on their **well-being** with **fewer stress factors** linked to the complexity of the rules, set against the day-to-day reality of farming" [206].

The study has sought feedback from MAs/PAs [207] and advisory services on the implementation and achievements so far of the above simplification measures.

Overall, these simplifications have been met with a mix of optimism and scepticism. While they address specific burdens and offer notable relief in some areas, challenges related to timing, communication, and uneven impact persists [208]. The main insights gained from these responses are summarised below.

The main **positive impacts** of the EU-level simplifications were in connection with GAECs and small farms:

- **GAEC 8 (set-aside requirements)**: many respondents welcomed the removal of the requirement to leave 4% of arable land non-productive, noting it reduced operational and administrative burdens significantly. This change was perceived as particularly beneficial for smaller farms.
- **GAEC 7 (crop diversification)**: introducing crop diversification as an alternative to crop rotation was highlighted as a flexibility that eased compliance burdens and offered environmental benefits.
- **Exemption for small farms (<10 ha)**: removing some compliance requirements for farms under 10 hectares was widely appreciated. It reduced inspections and administrative loads, benefiting both farmers and controlling agencies.

204 Synthesis of *ex ante* evaluations of CAP post 2020, December 2023, p. 46.
205 *Ibid*, p. 45.
206 Simplification measures for farmers, European Commission, SWD(2024) 360 final, p. 34.
207 Q11: In the course of this year, the European Union has approved several modifications to the current CAP regulations in the context of an ongoing simplification process (e.g. simplification of some conditionality requirements). Do you think that these are already reducing or will eventually reduce the burden for beneficiaries? Which modifications in particular?
208 Scoping interviews with EU-level organisations also suggest that they address only a small part of the spectrum of simplification proposals, such as those put forward by 'Copa and Cogeca proposals for the Simplification of the Common Agricultural Policy and related policies' (20 February 2024).

Some **critical perspectives** were highlighted, concerning:

- **Short-term benefits**: some respondents argued that the changes provided only temporary relief and did not address long-term structural or administrative burdens.
- **Complexity persists**: respondents noted that while certain requirements were simplified, overall complexity remained high. Some felt that new exemptions or alternative options added confusion rather than clarity.
- **Unequal impact**: the benefits of the changes were unevenly distributed. For instance, small farms benefitted more than larger ones, and the changes had limited relevance in regions with specific farming conditions (e.g. Finland and Slovakia).
- **Concerns about environmental impacts**: some stakeholders criticised the changes as reducing environmental commitments, potentially sending the wrong message about sustainability goals, while respondents from environmentally sensitive regions worried that exemptions (e.g. GAEC 8 removal) could lead to negative long-term ecological effects.

Lastly, some key **implementation challenges** were stressed:

- **Timing issues**: many respondents noted that the timing of these changes during key periods, such as application deadlines, created confusion.
- **National adaptations**: variations in how Member States implemented these modifications led to differing levels of burden reduction. Some countries, like Denmark, maintained stricter standards despite EU level relaxations.

Simplification in practice: Member State level

Feedback was also sought from MA/PA participants on **the implementation and achievements of measures planned in the CSPs** [209]. The main insights gained from these responses are summarised below. Overall, the responses reveal that simplification efforts are broadly focused on reducing redundancy and streamlining processes by using various tools. The most common answers regarding **positive effects** concerned the following:

- **Digital tools and automation**: many respondents highlighted the implementation of digital tools, such as pre-filled applications, online submissions and monitoring systems.
- **Simplified cost options**: SCOs were frequently mentioned as a successful method for reducing documentation and administrative effort.
- **Support for small farms**: exemptions for smaller farms (e.g. from crop rotation rules or detailed inspections) were commonly identified as effective.
- **Flexibility in rules**: adjustments to specific GAEC standards and eco-scheme rules were noted as beneficial.
- **Advisory support**: farmers value assistance from advisory services, particularly for navigating complex CAP requirements.

A number of **challenges and opportunities** were highlighted:

- **Challenges**
  - Digital systems, while promising, still face issues such as user-friendliness and connectivity problems in remote areas.
  - Simplifications have sometimes shifted the burden from administrative bodies to farmers, particularly for compliance monitoring.
  - Resistance to change and lack of awareness among farmers about new systems and policies hinder adoption.
- **Opportunities for improvement**
  - Enhance training and awareness programmes for farmers, especially in digital tools.
  - Ensure that simplifications genuinely reduce burdens rather than redistributing them.
  - Expand the use of successful measures like SCOs and flexible rules to more interventions and regions.

A similar question [210] regarding CSP planned actions, which have already been put into effect and potentially represent good practice, was included in the **advisory services survey**. The responses highlight a mixed awareness of simplification actions within the CSPs of different countries. Some respondents identified measures perceived as positive changes, but many either were unaware of implemented actions or noted minimal impact. The effectiveness of simplification measures varied by country, with some participants sceptical about the CSP authorities' actual ability to reduce administrative burdens.

In terms of specific insights, the responses confirmed the positive effects reported above by MAs/PAs but also stressed additional challenges, mainly, from the farmers' perspective, as follows:

- Awareness of implemented measures remains low, highlighting the need for better communication and training.
- The complexity of eco-schemes and GAEC standards continues to challenge both farmers and advisors.
- Digitalisation efforts must balance efficiency with accessibility for all stakeholders, particularly those in rural areas with limited technological resources and older farmers.

209 Q12: Can you briefly describe the main simplification actions planned in your CSP which have already been put into effect and can be considered as representing good practices for reducing administrative burden for CAP beneficiaries?
210 Q26: Can you name any of the simplification actions planned in the CSP of your country which have already been put into effect and can be considered as representing good practice?

Alternative solutions for burden reduction

Insights were also sought from MAs/PAs [211] on complementary measures which could reduce the administrative burden borne by CAP beneficiaries. The main responses from MAs/PAs were focused on three themes:

1. **Training and capacity building**
   - Continuous and targeted training for farmers, advisors and administration staff.
   - Addressing the digital divide among older farmers and those in rural areas.
   - Enhancing training tools like webinars, interactive sessions and practical workshops.
2. **Better coordination and communication**
   - Streamlining processes between EU, Member States and local institutions.
   - Improving communication strategies to provide timely and clear information.
   - Encouraging feedback loops from farmers and advisors to policymakers.
3. **Advisory services**
   - Expanding free advisory services tailored to different farm sizes and needs.
   - Strengthening regional advisory networks for hands-on support.
   - Using trusted, independent advisors for personalised and actionable advice.

The equivalent question posed to advisory services [212] elicited similar responses to the above-mentioned themes. Three **recommendations** can be distilled from these responses:

- Authorities should adopt a proactive communication strategy that includes workshops, plain-language materials and responsive help desks.
- Training programmes should include feedback loops to continuously refine content based on farmer needs and experiences.
- Simplification efforts should be accompanied by a cultural shift within administrative systems, emphasising support and education over enforcement and penalties.

Overall, the potential positive contribution of the advisory services and other complementary solutions is in line with the European Commission's approach to simplification, which includes specific proposals on strengthening the role of the advisory services [213].

Good practices

The positive effects of simplification and other measures implemented so far, signpost to good practices that could inform the search for simplification and other complementary solutions at Member State level. In order to capture the degree of awareness of such simplification efforts across the EU, both MAs/PAs and advisory services were asked if they were "aware of any simplification strategies or specific actions in other Member States which potentially are cases of good practice" [214].

Just over 50% of MA/PA respondents were in a position to mention in a positive light some simplification actions taken in other countries, mainly falling under the following themes:

1. **Digitalisation and technological advancements**
   - Countries like Estonia, Spain and Denmark have been highlighted for their advanced digitalisation practices, including centralised electronic systems, geotagged photos, and pre-filled application forms, which significantly reduce administrative burdens.
   - Estonia's streamlined databases and integration of IT systems stand out as a model for digital transformation.
2. **Simplified cost options and payments**
   - Many Member States have adopted simplified cost options (e.g. flat rates and lump sums) for interventions, particularly in Austria, Poland and Hungary. These reduce administrative workloads and provide consistency in cost evaluations.
   - Hungary's approach to faster project administration and payment disbursement was particularly noted for its efficiency.
   - In Cyprus, administrative processes are significantly simplified by issuing decisions via email. Beneficiaries receive electronic notifications and can immediately access their decisions. This approach eliminates waiting periods for formal documentation, streamlining payments and reducing delays caused by traditional bureaucratic processes.
3. **Flexible measures and other adaptations**
   - The Netherlands exemplifies effective simplification by reducing interventions to fewer, more manageable actions.
   - Use of draft budgets in Austria and Estonia by which a LAG may analyse an application project based on data already gathered for a previous similar application, without requiring a large set of data from the beneficiary.
   - Umbrella projects, as implemented e.g. in Poland, by which an entity, usually a LAG makes itself responsible for a group of very small projects. This allows for the beneficiaries to be exempt of demonstrating compliance with many criteria, focusing instead on proving the effective results of the project.

211 Q13: Do you think there is scope for administrative burden reduction at EU or Member State level through other solutions complementary to simplification actions (e.g. training, capacity building, better coordination, communication of the MA, free advice offered by national and regional competent authorities)?
212 Q28: Do you think there is further scope for burden reduction either at EU or MS level through other solutions complementary to simplification actions (e.g. training, capacity building, better coordination, better communication from authorities, free advice, other)?
213 The Commission sent a note to Member States proposing actions that would encourage them to strengthen the role of advisory services to include and support all impartial advisors, both public and private, and integrate them into their Agricultural Knowledge and Innovation System (AKIS). (Simplification measures for farmers, European Commission, SWD(2024) 360 final, p. 21).
214 Questions 16 and 27, respectively.

Respondents have also stressed the importance of **advisory and support services** as in the case of advisory systems in France and Austria which are seen as making effective use of advisory services managed by non-governmental organisations.

The majority of **advisory services survey** respondents were either unaware of simplification strategies in other Member States or unable to identify specific actions. However, some responses highlighted examples of effective practices in areas like **digitalisation**, **integration of monitoring systems**, **alignment of CAP and national requirements** and **advisory support**. Specific examples recorded by respondents include:

- "France has introduced a centralised digital portal that consolidates applications, compliance checks, and payments for CAP beneficiaries, streamlining access and reducing administrative steps".
- "Denmark has simplified its environmental compliance by aligning CAP requirements with national standards, making it easier for farmers to meet both sets of obligations".
- "In the Netherlands, advisory services leverage precision agriculture tools to automate data collection for compliance, minimising manual reporting".
- "Coordinated dialogue between Member States and beneficiaries, related to olive oil sectoral interventions, in Italy".

The insights gained from the responses of the MAs/PAs and advisory services confirm the earlier observations in this sub-section that **simplification good practices are mostly focused on digitalisation and in harmonisation and streamlining measures, as well as on effective dialogue between Member States and beneficiaries, and advisory support**. They also highlight the need for **better sharing of information on experiences and good practices across EU countries,** which is in line with the emphasis placed on the exchange of best practice by the European Commission as part of its simplification approach [215].

4.3.4. Research Question 3: conclusions

In the 2023-2027 programming period, CAP regulations establish objectives, provide strategic directions and set basic requirements, while the new delivery model allows a high degree of flexibility in how Member States implement the CAP through country-specific CSPs.

This section has focused on the attribution of administrative burden borne by CAP beneficiaries to different sources of burden, i.e. between EU legislation and Member States' choices and, in the case of the former, between CAP legislation and other (non-CAP) legislation. It has then sought to assess the extent to which the administrative burden arises from requirements and conditions that are not strictly necessary for achieving CAP objectives and, hence, can be regarded as gold-plating. As a corollary, it has explored the simplification and other complementary measures which have been pursued since the adoption of the CSPs to address gold-plating.

Administrative burden and gold-plating

Overall, the share of burden stemming from the choices of Member States is significant. The responses of MAs/PAs and advisory services show that 60% or more of the source of burden is attributed to choices for which Member States are regarded exclusively, mainly or at least equally responsible with the EU level. This applies also to individual areas of burden including those identified as most burdensome, namely 'Direct payments and annual CAP application', 'Rural Development: investment interventions', 'Eco-schemes' and 'Environmental requirements and schemes'.

The attribution of burden stemming from EU level to CAP and other legislation by MAs/PAs and advisory services points to a preponderance of CAP legislation. However, there are several areas of burden where the weight of 'both CAP and non-CAP' together with the smaller 'mainly non-CAP' responses is considerable, especially regarding 'Rural Development: investment interventions', 'Eco-schemes' and 'Environmental requirements and schemes'.

The evidence obtained from various sources points to a large part of the conditions and requirements put in place by Member States as being excessive or unnecessary for achieving the objectives of CAP and, thus, representing a potentially large amount of gold-plating. This has been illustrated by the numerous suggestions for simplification and other burden reduction measures put forward by the contributors to this study.

However, for a number of reasons, the actual gold-plating and the scope for burden reduction at CSP level are likely to be more limited in the context of CAP implementation in the current period. A limiting factor is that although some of the simplification suggestions identified represent wide-ranging propositions, most suggestions have been inspired by specific country experiences and their applicability will need to be considered in the particular context of each CSP.

Simplification approaches and complementary measures in practice

Regarding the simplification approaches in the adopted CSPs, digitalisation and e-governance tend to have a central position across Member States. Other prominent themes include simplified cost and evidence submission, harmonisation and streamlining, flexible and transparent monitoring, and enhanced training and support. The most common answers regarding positive effects of measures promoted or taken by Member States concern solutions based on digital tools and automation, simplified cost options and support for small farms. However, many respondents were unaware of implemented actions or noted minimal impact.

The package of simplification and other related measures initiated by the European Commission in February 2024 has been met with a mix of optimism and scepticism from MAs/PAs and other participants in the study. While they address specific burdens and offer notable relief in some areas, challenges related to timing, communication, and uneven impact persist. The primary positive impacts were observed in relation to GAECs and small farms.

215 Simplification measures for farmers, European Commission, SWD(2024) 360 final, p. 20.

Insights obtained from MAs/PAs and advisory services into other measures that could reduce the administrative burden borne by CAP beneficiaries have stressed the importance of training and capacity building, better coordination and communication and strengthening of advisory services. They have pointed to the value of a proactive communication strategy, feedback loops, and a cultural shift emphasising support and education over enforcement and penalties.

Good practices have mostly been identified in connection with simplifications focused on digitalisation and on harmonising and streamlining measures, as well as on effective Member State beneficiaries' dialogue and advisory support. Study participants have also highlighted the need for better sharing of information on experiences and good practices across EU countries.

Addressing simplification challenges: Lessons from recent and current experience

A large amount of burden reduction potential has been identified by this study, as well as numerous suggestions regarding simplification and other burden reduction measures that could be taken, mostly by Member States.

For many Member States, the substantial administrative challenge of the CAP implementation in this period was, to a large extent, anticipated [216]. Both the European Commission and Member State authorities are well aware of the issues and have been responding by pursuing simplification and other measures, and other changes are being explored or are already in the pipeline. It is worth noting that many of the simplification solutions put forward by MAs or PAs as part of this study were prefaced with remarks such as "we are already trying/testing [this or that]".

Nevertheless, simplification of the implementation of the CAP, including a reduction of administrative burden borne by CAP beneficiaries, is an ongoing process [217] and it will not be realistic to expect a 'bonfire of regulations' in the context of CAP implementation in the current period. Widespread and largely ad hoc changes could appear suitable for solving or alleviating specific problems confronting different categories of CAP beneficiaries, but their overall effect could prove of lesser value than expected if they were to intensify horizontal issues such as the stability of rules and beneficiaries' awareness, or otherwise impacted adversely the effects of interventions.

A systematic approach would therefore be essential, distinguishing between horizontal solutions that can be pursued across Member States and customised solutions to fit the NDM and national institutional and legal considerations applicable to individual countries. It will be appropriate for the former to be led by the European Commission and the latter by Member State authorities, and their efforts to involve clearly structured activities and timelines as outlined below.

1. **Horizontal solutions** should:
   - i. Address the underlying main cause of overregulation, which according to all categories of contributors to the study (MAs/PAs, advisory services, EU-level organisations) is the 'fear of audit' and scepticism about concerns regarding the potential 'abuse of funds' at Member Stater level [218]. The greater discretion granted to Member States in the new delivery model has led to an over-cautious approach by programme authorities placing a disproportionate administrative burden on the beneficiaries. A better balance needs to be found that will allow many specific simplification actions to be implemented.
   - ii. Spread the use of digital solutions. Digitalisation and associated e-governance, process streamlining etc. improvements are centre-stage in all Member States and should by supported as a means of accelerating simplification in a way that benefits all groups of beneficiaries.
   - iii. At least in the short-to-medium term, recognise the value of other (complementary to simplification) solutions and boost free advisory support, training and communication.
2. **Customised solutions** should:
   - i. Address the limited awareness of other countries' experiences through better sharing of knowledge and good practices (exchange platforms, documentation of good practices, etc.) [219].
   - ii. Conduct Member State-specific 'audits' and targeted peer reviews to identify and help adapt the most appropriate simplification and other complementary solutions.

216 Lovec, M. *et al*, New CAP Delivery Model, Old Issues, *Intereconomics*, 2020.
217 *Assessing simplification of the CAP for beneficiaries and administrations*, EU CAP Network, 2025, https://eu-cap-network.ec.europa.eu/publications/assessing-simplification-cap-beneficiaries-and-administrations_en.
218 For example, expressed by a PA respondent as "we're nervous about the audit".
219 "There is a lack of information on simplification strategies adopted in other Member States; DG AGRI could help by issuing guidance, working documents, networking, organisation of seminars/workshops and regular publication of good practices" EL respondent to Q16.

5. Overall conclusions

Based on extensive data collection at EU and national level, this study has examined the main sources of administrative burden for the beneficiaries of 2023-2027 CAP and possible options for policy simplification.

The analysis has first explored, in qualitative and quantitative terms, burdensome and time-consuming administrative tasks, challenges related to compliance with requirements and issues arising from the implementation of specific types of interventions. The study has then focused on the legislative sources of burden, shedding light on the part of burden arising from Member States CAP implementation choices, discussing the opportunities and the concrete steps taken to reduce complexity for beneficiaries.

Clarity and consistency of regulatory frameworks

The current CAP programming period has brought many novelties, including enhanced ambition for green agriculture, the merging of the two pillars into one, the national CAP Strategic Plans and a new delivery model focused on performance, with more freedom for policy design (and more responsibility for ensuring compliance) placed on CSP Managing Authorities. A cross-cutting reading of the causes of burden identified by this study suggests that complexity is to some extent related to **the clear understanding and transposition of these novelties into national CSPs** [220]. Examples of this include the perceived complexity of **eco-schemes**, which consistently emerge as a significant area of burden throughout the analysis and the interplay among the elements of the **'green architecture'** (e.g. enhanced conditionality, eco-schemes and environmental commitments under rural development) that has led to some confusion in CSP implementation and fear of making mistakes for both beneficiaries and authorities. Evidence from interviews at Member State level and documentary research also suggests that **the boundaries of the Member States' responsibilities and room for manoeuvre**, one of the main features of the new delivery model, are, to some extent, **still unclear** [221]. The claim for clarity adds to the widespread perception of a complex regulatory framework, with multiple, potentially conflicting, legislative layers that, moreover, change frequently.

Causes of burden for farmers and other CAP beneficiaries

The analysis of the CAP aid procedural steps, based on the triangulation of findings from several sources, has outlined the main causes of burden for CAP beneficiaries and pointed to the relevant legislative sources at the level of EU and Member States. Drawing on the results of the TC, the report has focused on the most burdensome requirements and interventions, shedding light especially on farmers' difficulties in complying with GAECs and administrative burden related to investment interventions for all types of beneficiaries. The table below brings together these findings.

220 As some interviewed stakeholders commented, perceived complexity is, at least to some extent, bound to decrease as the programming period progresses and stakeholders get more familiar with the new rules.

221 Source: interviews with MAs, PAs and other Member State stakeholders; European Commission, Commission Staff Working Document 'Simplification measures for farmers' (2024). In some cases, Member States require EU to take action in matters that are not covered by CAP regulations and fall within the competence of national authorities (e.g. adapting requirements and aid schemes to local conditions, designing streamlined control systems).

Table 21. Main causes of burden for CAP beneficiaries

Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
Clarity and communication	Unclear rules and procedures	Preparation	Cross-cutting	EU: difficulty to go through CAP regulations (e.g. lengthy, technicalities, terminology) EU/Member States: late approval of legislation (CAP regulations, CSPs and implementation acts) with no time to get familiar with novelties (e.g. 'eco-schemes', 'new green architecture' Member States: poor or delayed information and support; unclear calls and implementation documents
	Unclear rules and communication with inspectors	Controls	Cross-cutting	Member States: (both CAP and non-CAP): unclear rules underpinning controls, unclear follow-up, including sanctions, difficulty to communicate with inspectors
	Unclear rules for conditionality and other requirements	Meeting requirements	GAECS Other environmental and sanitary rules	EU/Member States: overlaps with national legislation; unclear definitions (e.g. buffer strips, non-productive areas) Member States: additional requirements; unclear implementation, simplification measures not fully implemented
Complexity and consistency of regulatory frameworks	Frequently changing rules	Preparation Application	Cross-cutting	EU: amendments to CAP regulations EU/Member States: amendments to CSPs Member States: changes in calls and other implementation documents and procedures, sometimes while calls are open
	Multiple layers of legislation	Preparation Recording/reporting Controls	Cross-cutting	EU/Member States: multiple sets of rules, potentially overlapping and conflicting

Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
Excessive information obligations	Collection of evidence and proofs	Application	Investments Sectoral interventions (POs) EIP OGs	Member States: information, proofs and supporting documents required when applying for investments and area/animal-based interventions
	Time consuming follow-up activities	Application	Area-based interventions	EU: rules regarding area monitoring system and geo-tagged photos Member States: implementation of IACS and national IT systems
	Excessive or time-consuming recording and reporting	Recording/reporting	Eco-schemes Area/animal-based interventions Investments Wine sector EIP OGs	EU/ Member States (both CAP and non-CAP): multiple recording and reporting obligations Member States: recording/reporting obligations related to CSP interventions, including rigid deadlines
	Administrative and organisational aspects	Meeting Requirements	GAECs	EU/Member States: administrative tasks (e.g. recording and reporting) related to conditionality
Repetitive tasks	Repeated or continuous submission of the same information	Application Recording/reporting	Wine sector	Member States: CAP application procedures require the provision of the same information repeatedly Member States: (CAP and non-CAP): several authorities ask for the same data (lack of harmonisation of procedures and interoperability of IT systems)
	Frequency and redundancy of controls	Controls		Member States: (CAP and non-CAP): several authorities ask for the same data (lack of harmonisation of procedures and interoperability of IT systems)

Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
Compliance issue	Meeting requirements and eligibility conditions	Application Controls Meeting requirements	Eco-schemes Area/animal-based interventions Investments Sectoral interventions (POs)	EU: CAP regulations: financial thresholds (environment, research) for POs, rules for investments in irrigation Member States: requirements (e.g. gold-plating, restrictions, rigid deadlines) set for nationally designed CSP interventions
	Farm management operations	Controls Meeting requirements	GAECs Other environmental and sanitary rules	EU: challenging objectives of GAECs and other requirements Member States: additional requirements, lack of adaptation to local conditions simplification measures not fully implemented
	Contextual issues	Preparation Application Controls Meeting requirements	GAECs Other environmental and sanitary rules	
	Economic impact	Preparation Meeting requirements	GAECs Other environmental and sanitary rules	
Digitalisation issues	Issues related to digital tools or online platforms	Application	IACS interventions	EU: difficulties and time-consuming activities related to LPIS and geospatial application Member States: issues with IT platforms and tools
	Limited or inefficient use of digital tools for recording and reporting purposes	Recording/reporting	Cross-cutting	Member States: (CAP and non-CAP): manual recording, reporting systems not functioning or not interoperable

Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
Barriers to cooperation	Limited availability of data about the LEADER area	Preparation	LAGs	Member States: (CAP and non-CAP): lack of granular data
	Barriers to cooperation	Preparation Application	EIP OG LAGs	Member States: practical and financial obstacles to cooperation (e.g. farmers not remunerated for their work in OG projects, still limited use of SCOs in EIP OG and LEADER)
	Resource constraints for LAGs	Management of LDS	LAGs	EU (CAP and non-CAP)/ Member States: ambition of LEADER approach *vs* staff and resource constraints
	Drawing up a non-discriminatory and transparent selection procedure and criteria	Application Management of LDS	LAGs	
	Selection of operations	Application Management of LDS	LAGs	
Strict rule enforcement	Strictness, lack of flexibility or proportionality of inspections	Controls	Cross-cutting	Member States: enforcement of rules and penalty systems perceived as rigid

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of RQ1 findings (multiple data sources)

Links between qualitative and quantitative analysis

Across all CAP beneficiary categories, the **aid application phase** consistently emerges as the most time-consuming and burdensome, particularly for tasks like preparation, compliance checks and aid application itself. Conversely, follow-up tasks such as reporting and inspections, while still significant, generally require less time but can still be perceived as burdensome due to pressure or inefficiencies in communication. **A clear relationship exists between the time spent on administrative tasks and their perceived burden**, with more time-intensive activities often rated as 'very burdensome' in the surveys of different CAP beneficiaries.

Qualitative and quantitative analysis dedicated to **administrative burden for farmers** shows higher complexity for large and very large farms (i.e. more than 100 hectares), while small farms, although experiencing less burden (which is likely to further decrease after recent simplification measures exempting farms under 10 hectares from conditionality controls and sanctions), may still have difficulty to access CAP funding due to financial constraints and reduced administrative capacity. Livestock and field crop farms report higher costs than other crop farms and more complexity in relation to environmental commitments such as eco-schemes and AECCs.

Farmers participating in the TC incur an estimated average annual cost of around EUR 1 230, roughly equally distributed across internal costs (i.e. time spent on administrative tasks, then monetised) and external costs (e.g. use of advisory services). With respect to the internal costs, they spend an average of seven working days annually on administrative tasks, though this varies by farm size and type: smaller farms (<5 hectares) typically spend one to four days, while larger farms (>500 hectares) often spend six days or more, with field crop and livestock farms reporting higher workloads than horticulture farms. When weighting by farm size and applying stricter or more relaxed assumptions on the sample, the estimated time spent on CAP-related administrative tasks ranges from 5.6 to 8.7 working days per year. In terms of median values, the previous study on the administrative burden of the CAP reported an annual cost of EUR 236 (15 hours) per farmer, while the current study estimates a median annual cost of EUR 433 (28 hours). Notably, the change in estimates is influenced by differences in methodological assumptions, sampling strategies and the overall analytical approach across the two studies. For **wine growers and producers**, sectoral interventions appear, based on quantitative data, as a major source of administrative burden, particularly tasks linked to compliance and reporting for market support and environmental measures. Respondents dedicating over 10% of their time to these activities perceive them as significantly more complex, while those spending less time view them as less burdensome. However, qualitative responses give a more nuanced picture, with higher burden specifically associated to the most participated interventions (i.e. restructuring and replanting of vineyards and investments) rather than sectoral interventions overall. Tasks like 'Aid application' and 'Recording and reporting' are among the most time-intensive and burdensome, reflecting the challenges tied to sector-specific obligations. **Producer Organisations** also face significant burden linked to sectoral interventions, with 73% of respondents dedicating over 10% of their working time to these activities. Tasks such as 'Aid application' and 'Controls and inspections' are consistently rated as both time-intensive and burdensome, highlighting their role as bottlenecks. For **Operational Groups** under EIP-AGRI, the time spent on administrative tasks aligns closely with perceived burden. Activities like proposal preparation (8.7 days) and reporting for interim payments (12.5 days) are rated as particularly burdensome, reflecting the challenges of managing projects with diverse stakeholders. Although less time-consuming, step two [222] of the application process is deemed more difficult as it involves drafting the details of projects and meeting financial and procedural obligations. Tasks with lower time commitments, such as inspections (5.1 days), are perceived as less burdensome, underscoring a proportional relationship between time and perceived complexity. **LAGs** report the highest variation in administrative burden due to their diverse structures and focus on LEADER measures. Application-phase tasks, particularly preparation to apply and the aid application, are the most time-intensive and burdensome. Follow-up activities, like reporting and inspections, despite requiring less time, are still challenging for many. Finally, for **advisory services**, when they are themselves beneficiaries of CAP support, the application phase remains the most burdensome. Tasks such as 'Preparation to apply' and 'Aid application' are rated as 'very burdensome' by most respondents, despite the lower overall time commitments compared to other beneficiaries. Follow-up tasks, including 'Recording and reporting' and 'Controls and inspections', also contribute to the perceived burden, even when they require less time.

Across all beneficiary categories, a recurring issue is **the need to submit the same information multiple times**, highlighting inefficiencies and poor coordination in administrative processes. Farmers taking part in the TC report the highest levels of duplication, with 72% indicating they must resubmit the same information, often to different authorities (47%) or the same authority (25%). Similar concerns are echoed by Producer Organisations (POs), wine growers, and LAGs, who cite overlapping requirements for documentation such as compliance proofs, land use records, and financial statements. These redundancies are attributed to the lack of coordination between administrative bodies and inconsistencies in data-sharing mechanisms.

Reliance on external advisory services varies significantly across groups. Farmers taking part in the TC demonstrate a high dependence on this service, with 78% utilising paid external support, often from associations or cooperatives, to navigate CAP requirements. POs and wine growers also rely on external advisory services, though at slightly lower rates, as sectoral interventions often demand specialised knowledge. Conversely, EIP-AGRI OGs and advisory services themselves report the least reliance on external support, leveraging their in-house expertise and collaborative networks. LAGs also predominantly manage tasks internally, with only 26% seeking external assistance, reflecting on the specificity of the LEADER measure.

Beneficiaries have to comply with several sets of rules arising from CAP regulation, EU legislation outside the CAP, CSP implementation provisions, national legislation applying to certain interventions and administrative procedures. These regulatory layers multiply requirements and sometimes overlap, generating duplications or conflict, causing ambiguity and errors.

222 For EIP OGs, step one of the application involves setting up the OG and preparing the project idea, while step two requires detailed project drafting (including, supporting documents, budget, timeline).

Regarding the **sources of burden (EU/Member States), potential gold-plating and simplification actions,** CAP regulations are much less prescriptive than in previous programming period, with more rules laid down in CSPs and further implementing documents, still the analysis shows that **a significant share of burden is attributed to both EU and Member State level**. This finding (although it may conceal some biased interpretations or references to past compliance-based delivery models) well reflects the **perception of CSP stakeholders and advisory services that EU and national rules are intertwined and sources of burden are not unequivocal**. For instance, eco-schemes are entirely developed at national level, but the burden associated with them is partly attributed to the overall complexity of green architecture, of which eco-schemes represent a new tool. Similarly, proof of eligibility conditions and reporting obligations linked to non-IACS rural development, although arising from interventions designed in CSPs are frequently traced back to the administrations' need to protect themselves from EU audits and prevent loss of funds.

Furthermore, **a rather large share of burden (43%) is attributed to CAP legislation** even if, again, respondents' perception might have in some cases underestimated rules outside CAP or misattributed some categories (e.g. SMRs). However, several non-CAP requirements were identified as sources of burden, including environmental legislation (e.g. related to water, nitrates, animal welfare) and other legislation (public procurement rules).

However, the analysis highlights that **Member State are, at least in part, responsible for more than 60% of burden identified by respondents.** Notably, this share is higher for most rural development interventions (animal-based and non-IACS). Moreover, 60% of responses provided by CSP authorities and stakeholders specify that there is scope for reducing the burden attributable to Member States, therefore confirming that **a significant share of burden placed on beneficiaries is excessive or unnecessary** and, according to the definition adopted in this study, represents potential gold-plating.

A number of factors (e.g. wide-ranging propositions or, conversely, context-specific issues, vaguely formulated solutions and non-CAP related aspects) limit the concrete possibility of reducing the burden in the context of the current CAP. Nevertheless, the study has gathered many suggestions, concrete options and existing practices for simplification from beneficiaries, advisory services and contributors at EU and CSP level. Taking stock of them, it is possible to see how they address, at least to some extent, the most challenging aspects. The table below links some of the simplification actions that Member States have planned or implemented (RQ3) and some of the suggestions made by beneficiaries (RQ1) with the causes of burden identified by the study.

Table 22. Simplification actions and causes of burden addressed

Simplification action \ Cause of burden addressed	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
Streamlined databases and integration of IT systems (automation of proof)			X	X				
Advanced digitalisation practices: centralised electronic systems, geo-tagged photos, pre-filled application forms (reusing data of the previous year if nothing changes), one-stop-shop platforms for application, tracking and communication, user-friendly apps and portals	X	X	X	X		X	X	
Simplified cost options and draft budgets			X				X	X
Decisions issued via email	X							
Reduction of the total number of interventions		X						
Umbrella projects (reduction of tasks and responsibilities for very small projects)			X		X		X	
Alignment of CAP requirements and national standards		X			X			
Use precision agriculture to automate data collection for reporting tasks			X					

Cause of burden addressed / Simplification action	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
Structured dialogue platforms between authorities and beneficiaries	X						X	
Enhanced paperless administration			X					
Aligned application periods and conditions for aid schemes	X	X						
Tiered or proportional compliance systems based on the size of the farm			X		X		X	X
Expand the need-to-know approach			X					
Reduce supporting documents for small projects			X					X
Simplify procedures (e.g. for building permits) through enhanced dialogue with local authorities		X	X					
GAECs: › Improve databases for GAEC 2 and 4					X			
› Provide guidance to implementation (including video and animations). All GAECs	X				X			
› Change national rules that impose stricter requirements		X			X			
› Allow intercropping as crop rotation/diversification (GAEC 7)					X			

Simplification action \ Cause of burden addressed	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
Tailor requirements to small farms (allow extended deadlines, reduce reporting obligations during busy periods, conduct joint inspections)			X	X	X			
Conduct early information campaigns, clear jargon-free explanation of schemes, requirements and sanctions	X							
Real-world testing of new regulations		X			X			
Foresee derogations for: › Rented land › Organic farms › Adverse weather conditions › Phytosanitary crisis (e.g. controlled stubble burning)					X			X
Introduce self-certification of compliance with requirements			X		X			
Increase transparency: › automated notifications for deadlines and updates › advance notice for inspections › real-time updates on application and payment status › early-warning systems	X							
Allow tolerance for minor errors								X

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), multiple data sources

This exercise suggests that all causes of burden could be addressed by one or more of the simplification actions, allowing for some concluding remarks to be drawn.

1. Although the occurrence of administrative burden is widespread, CAP applications and associated tasks are particularly burdensome (RQ1) and across all categories, the application phase consistently consumes the largest share of time (RQ2). Several actions address administrative burden associated with the application phase, specifically aiming to reduce the number of information obligations for all types of beneficiaries.

2. Linked to this, other actions target preparatory steps that precede the application, with a view to facilitate the gathering of information and the correct understanding of rules.

3. Assessing the impact of the proposed simplification actions on administrative burden is beyond the scope of this study. However, the strong coherence between the perception of complexity (RQ1) and the costs incurred for the preparation and application activities (RQ2) suggests that there is potential to reduce the burden both qualitatively and quantitatively.

4. Common solutions apply to most non-IACS rural development interventions (e.g. SCOs) despite their peculiarities. Similarly, the enhancement of digitalisation promises to further streamline and standardise IACS-based procedures, thereby improving user-friendliness, interoperability and services for farmers (e.g. alerts, information, monitoring).

5. Compliance poses more challenges as standardised simplification actions may conflict with the widespread claim for more flexibility and adaptation to specific contexts. The simplification actions proposed for GAECs, beyond the disruptive changes that would jeopardise their objectives, tend to focus on purely national issues (e.g. clearer definitions, removal of more restrictive requirements, address overlap with national legislation) and may not allow replicability. This is true, to an even greater extent, for nationally designed eco-schemes and AECC.

Most of the simplification actions illustrated above pertain to the responsibility of Member States. This is not surprising as MAs, PAs and Member State stakeholders were invited to reflect on the share of burden arising from CSP implementation and how it could be reduced. However, simplification is a common issue within the EU and it should continue to be pursued **following a methodical and sustainable simplification approach** involving:

- **Horizontal solutions**, led by the European Commission and aimed to govern and boost the cross-cutting processes of digitalisation (taking into account issues linked to digitalisation, e.g. farmers' digital skills) and knowledge sharing (e.g. training, communication, advice and support to stakeholders). 'Fear of audit', one of the causes of overregulation (RQ3), should also be tackled at horizontal level.

- **Customised solutions**, led by Member States and aimed to address the root causes of gold-plating, favour the sharing of experiences and good practices among Member States, as well as peer reviews and coordinated actions targeting simplification.

6. Annexes

Annexes are presented in a separate document.

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