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*Evaluation Study*

**THE EVALUATION OF THE IMPACT OF OVERREGULATION  
ON THE  
IMPLEMENTATION OF NRDP 2014-2020**

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## List of acronyms

Acronyms	
AFRI	Agency for Rural Investment Financing
AIR	Annual Implementation Report
ANC	Areas with natural constraints
APIA	Agency for Payments and Interventions in Agriculture
CAP	Common Agricultural Policy
EC	European Commission
CMEF	Common Monitoring and Evaluation Framework
COFRI	County Office for Financing Rural Investment
EAFRD	European Agricultural Fund for Rural Development
EAGF	The European Agricultural Guarantee Fund
ENRD	European Network for Rural Development
ESIF	European Structural and Investment Funds
EU	European Union
FG	Forest Guards
GVA	Gross Value Added
LAG	Local Action Group
LDS	Local Development Strategy
LEADER	Links Between Actions for the Development of the Rural Economy
LLC	Limited Liability Company
MA	Managing Authority
MA NRDP	Managing Authority for the National Rural Development Program
MARD	Ministry for Agriculture and Rural Development
MC	Monitoring Committee
NAEP	National Agency for Environmental Protection
NGO	Non-governmental Organization
NNRD	National Network for Rural Development
NSVFSA	The National Sanitary Veterinary and Food Safety Authority
OWUI	The Organization of Water Users for Irrigation
RDP	Rural Development Program
PNDR	National Rural Development Program
RCRIF	Regional Center for Rural Investment Financing
SME	Small and Medium Enterprises
TAU	Territorial Administrative Unit



# I. Executive Summary

## 1.1 Summary of the activity carried out

The experience from the previous programming period (2007-2013) has highlighted that the phenomenon of overregulation can generate incoherence in the implementation of the rural development program, may lead to an increase in the administrative burden and costs both among the authorities and among the beneficiaries of the NRDP, may affect the degree of attractiveness of the different sub-measures and, last but not least, may affect progress in achieving the objectives of the program strategy.

In this context, the purpose of this study is to identify the legal requirements and / or legal provisions that represent overregulation in the implementation of the NRDP, as well as to propose measures to simplify and assess the impact of the actions proposed in the 2014-2020 NRDP to reduce administrative burdens for both beneficiaries and authorities. In order to achieve this goal, the team of experts has completed four methodological phases, namely structuring, observation, analysis and evaluation, using the qualitative and quantitative analysis methods and techniques detailed in Chapter IV of this study that substantiated the answers to the evaluation questions allowed to develop conclusions and recommendations. The evaluation study was based on centralized beneficiary status reports submitted by the Contracting Authority (reflecting the situation registered until the end of June 2018), as well as qualitative data generated by interviews and focus groups, as well as quantitative data by applying questionnaires and conducting case studies.

The study methodology included the use of the following methods for collecting relevant data to ensure an analysis of all sub-measures launched by the start date of the project activities:

- **Collection and analysis of secondary data and development of analysis matrices:** based on the collection of secondary data, literature review, and desk research have been developed for the sub-measures that have been analysed, analysis matrices that facilitated the initial identification process of the potential overregulation elements. The purpose of these centralizing tools was to determine the correspondence between the requirements established in the relevant documentation (e.g. Applicant's Guide / Guidance Material, Measure Sheet or Program Document for each sub-measure), relevant European regulations and national legislation.
- **Semi-structured interviews:** interviews with representatives of the Managing Authority, Paying Agencies, representatives of the consultancy sector, respectively, were collected for the purpose of collecting information on the additional requirements compared to the European legislation demarcated on the basis of the analysis matrices beneficiaries and non-beneficiaries. These have been developed with a view to addressing each sub-measure launched.
- **Survey:** custom questionnaires based on the typology of respondents have been developed to collect data on procedural issues that have led to difficulties in completing the submission, selection, contracting, implementation and monitoring phases. Therefore, questionnaires were applied to the representatives of the Managing Authority, the Paying Agencies, as well as the representatives of the consultancy sector, the beneficiaries of the NRDP 2014-2020, the non-beneficiaries and the potential



beneficiaries. A sample was established for each sub-measure, with the Contracting Authority supporting the respondent's approach. Thus, in order to ensure a satisfactory response rate, questionnaires (which could be accessed on a dedicated online platform) were sent to 1660 beneficiaries, namely 57 non-beneficiaries, 32 potential beneficiaries and 33 consultancy firms. At the same time, beneficiaries, non-beneficiaries, potential beneficiaries and consultants were also contacted by telephone to encourage inquiries and provide any necessary explanations. In total, 281 responses were received from the beneficiaries, 6 replies from non-beneficiaries, 6 responses from potential beneficiaries and 5 responses received from representatives of the consultancy sector.

- **Focus groups:** in order to validate the issues raised by the data collection through the above-mentioned methods, two focus groups were organized which brought together representatives of the authorities involved in the implementation of NRDP, as well as representatives of the relevant associations and federations and beneficiaries of the NRDP 2014-2020.
- **Case studies:** in order to detail the difficulties encountered by the beneficiaries in the implementation of the projects supported under the 2014-2020 NRDP, 13 case studies (one case study for each sub-measure with completed projects) were carried out, the beneficiaries being contacted by sending them questionnaires for completion broken down by different procedural steps. For the selection of the beneficiaries, the support of the Contracting Authority which sent a selection sample was obtained, ensuring in this manner the obtaining of responses from the beneficiaries of the sub-measures: 4.1, 4.2, 6.1, 6.2, 6.3, 6.4, 10.1, 11.1, 11.2, 13.1, 13.2, 13.3 and 19.1. Potential elements of overregulation identified on the basis of the analysis matrices discussed and based on interviews could also be explored on the basis of questionnaires applied through case studies.
- **Benchmark analysis:** the purpose of this research method was identifying rural development programs implemented in other EU Member States where simplification measures have been put in place and implemented, addressing implementation solutions that could be replicated or adapted to the NRDP 2014-2020. Consequently, four case studies – Veneto, Tuscany (Italy), Aragon (Spain) and Ireland - were selected in order to gain an overview of the approaches that could be replicated.

## 1.2 Conclusions and recommendations

On the basis of the analysis, the impact of the overregulation on the implementation of the National Rural Development Program 2014-2020 is considered to be relatively low, the examination of the issues resulting from the analysis of the European and national legislative framework as well as the data from the application of the quantitative research methods and qualitative indicators not affecting aspects of the implementation of the program as a whole.

Thus, based on the responses gathered through questionnaires, based on interviews with key stakeholders and also following evaluators' remarks, the need to limit the high number of supporting documents requested by applicants / beneficiaries and issued by different public administration institutions arose. Through the establishment of new inter-institutional collaboration protocols, the authorities involved directly in the implementation of the NRDP could obtain, either by direct querying the databases or by requesting them



from the issuing authority, the information necessary to assess compliance with the requirements / criteria considered. At the same time, extending the possibility of submitting applications for all sub-measures electronically (similar to the model applied in the Veneto region), as well as developing an electronic module for the contracting and implementation phases, would also reduce the administrative effort and make the process of communication between authorities and beneficiaries as well as the process of project monitoring more effective. Despite the fact that it is not a matter requiring simplification per se, it is recommended to carry out inter-institutional consultations before making legislative changes with impact on the beneficiaries of NRDP and the need to carry out impact analyzes before modifying the legislative framework so that they do not affect implementation of the program or generate additional administrative burden or even risks for the beneficiaries of the NRDP. Similarly, the setting and periodic publication of timetables for launching funding sessions could help increase the predictability of the program. However, in addition to the general aspects, the analysis carried out at the level of the NRDP sub-measures 2014-2020 also revealed several specific conditions, the simplification / modification of which could contribute to increasing the efficiency of the program implementation and to reduce the administrative burden.

For support and innovation measures, the evaluators' recommendations are related to the way measures are implemented, encouraging the use of the standard cost option (sM 1.2) and the use of call for proposals despite the procurement procedure (sM2.1). At the same time, it is considered useful to adopt the solutions applied at the level of other rural development programs (as is the case with Veneto where IT platforms dedicated to data collection on participants are used for monitoring) to monitor training courses (sM 1.1).

For investment measures (4.1, 4.2, 4.2a, 4.3, 6.4, 7.2 and 7.6), the procedural simplification recommendations cover the supporting documents requested from the beneficiaries and the removal of requests for negotiations issued by public institutions (sM 7.2), the deviation of the moment of submission of opinions (sM 4.3) and the reduction of supporting documents requested by the beneficiaries and issued by public authorities (sM 4.1). It is also recommended to adopt measures to improve the implementation of sub-measures such as modifying the project selection process in order to ensure better project segregation, simplification of the process of financial support through the possibility of submitting online payment requests (4.3), unitary grant support regardless of the nature of the applicant (sM 7.6), as well as establishing better synergy with Measure 2, by linking it with the launch of sM 6.4 (to support beneficiaries through counseling services in business plans).

For flat-rate support measures (6.1, 6.2, 6.3, 6.5, 9.1), the main recommendations type aim to support accessibility and elimination of potential restrictive conditions, encouraging the disconnection of support from accessing other schemes (sM 6.5, as well as the failure to request the submission of documents such as denials by public authorities (s. 6.3). At the same time, it is advisable to avoid re-checking the eligibility and selection criteria at the time of contracting, this verification being carried out at the stage of submission of the application (sM 6.2).

In the case of standard unit cost measures it is recommended to consider the possibility of carrying out the controls performed by AFIR and APIA (sM 8.1) at the same time, as well as to reduce the number of publicly



required supporting documents to the beneficiaries by concluding inter-institutional protocols and facilitating the direct verification of to the AFIR of the information required to establish eligibility (4.1a).

At the level of compensatory measures (M3, 10, 11, 13 and 15), the evaluators' recommendation mainly focuses on the procedural implementation of measure 15, avoiding double checking by different institutions involved in implementation.

Finally, for LEADER measures, recommendations address similar procedural aspects, such as the delegation of attributions to AFRI the process of endorsing the evaluation sheets, guidelines and methodologies developed by LAGs for atypical measures in SDL (sM 19.2), adopting the option of simplified costs or even lump sums (sM 19.1, 19.3 and 19.4) and facilitating online filing of payment claims (sM 19.1 and 19.4).





## II. Introduction

### 2.1. Purpose of the evaluation study

The National Rural Development Programme 2014-2020 (NRDP) is the programmatic document based on which the amounts allocated to Romania from the European Agricultural Fund for Rural Development for the 2014-2020 programming period are accessed. The document was developed based on Regulation (EU) No. 1305/2013 of the European Parliament and of the Council of 17 December 2013 on support for rural development by the European Agricultural Fund for Rural Development (EAFRD).

NRDP supports the strategic development of rural areas by addressing the following strategic objectives:

- Strategic Objective 1: "Restructuring and increasing the viability of agricultural holdings";
- Strategic Objective 2: "Sustainable Management of Natural Resources and Combating Climate Change";
- Strategic Objective 3: "Diversifying economic activities, creating jobs, improving infrastructure and services to improve the quality of life in rural areas".

The achievement of strategic objectives will be achieved through the six priorities of the European Union set out in the Rural Development Regulation (1305/2013):

- Encourage the transfer of knowledge and innovation in agriculture, forestry and rural areas (P1);
- Increase the viability of farms and the competitiveness of all types of farming in all regions and promote innovative agricultural technologies and sustainable forest management (P2);
- Promote the organization of the food chain, including the processing and marketing of agricultural products, animal welfare and risk management in agriculture (P3);
- Restoration, conservation and consolidation of ecosystems that are related to agriculture and forestry (P4);
- Promoting efficient resource use and supporting the transition to a low carbon and climate resilient economy in the agricultural, food and forestry sectors (P5);
- Promoting social inclusion, poverty reduction and economic development in rural areas (P6).

The experience from the previous programming period and from the first years of implementation of the NRDP 2014-2020 highlighted that the administrative burden at the level of the beneficiaries and of the authorities may have negative consequences in terms of the project selection process, implementation.

In line with the action lines established at the level of the Managing Authority, the necessary documentation and procedures for the implementation of the NRDP 2014-2020 measures must be written in a form that is as easy to understand and accessible to potential beneficiaries of European funds.

The overall purpose of the evaluation study is to identify legal requirements and / or legal provisions that represent overregulation in the implementation of NRDP and to recommend measures to simplify and assess



the impact of proposed actions in the NRDP 2014-2020 to reduce the administrative burden both for the beneficiaries and for the authorities.

According to the tender specification document, overregulation refers to the regulatory excesses achieved by the legal norms / requirements and conditions established at the national level in the NRDP 2014-2020, the procedures and guides of the applicant, which establish, for the beneficiaries and the authorities, obligations additional to the requirements of European law. At the level of this study, the operational definition considered for the concept of over-regulation refers to those rules / requirements / procedures set out in the NRDP implementation instruments (guidelines, models, procedures, etc.) that do not result from the corresponding obligations set out in EU regulations or legislation are not related to the programming choices resulting from the NRDP document and are not justified by the general principles on the regularity and sound financial management of EU funds.

Overregulation can create an incoherence in the regulatory frameworks regarding the implementation of the NRDP 2014-2020 and discrepancies regarding the rules and instructions imposed by the Managing Authority, in addition to the European legislation and the national legislation in force. Also, the process of overregulation may result in increased administrative burdens and costs both among authorities and among beneficiaries. At the same time, by introducing additional administrative tasks, the degree of attractiveness of the sub-measures as regards the submission of projects among beneficiaries is affected, and the process of achieving the objectives of the program is made more difficult.

Consequently, the evaluation study regarding the impact of overregulation of the NRDP 2014-2020 took into consideration the following aspects: identification of the mandatory requirements stipulated by the European and national legislation for each sub-measure NRDP 2014-2020; identifying additional requirements not derived from European and national legislation; assessing the impact of additional requirements; assessing the impact of proposed actions to reduce administrative burdens; formulating answers to evaluation questions and making proposals and recommendations for reducing administrative burdens. More broadly, the objectives of assessing the impact of the over-regulation on the implementation of NRDP 2014-2020 are also reflected in the achievement of the following objectives:

- \* Identification - the legal provisions / norms that represent overregulation and which cause additional difficulties in the implementation of NRDP 2014-2020, with the provision of solutions for their efficient integration, are analyzed.
- \* Planning / efficiency - ensures that there is clear justification for certain actions to reduce the administrative burden and that financial resources will be used efficiently;
- \* Providing knowledge - increasing the level of understanding of the effects of overregulation and providing recommendations and solutions on how administrative burdens are imposed on beneficiaries and authorities.

According to the purpose of the study and the proposed objectives, the expected results of the project are aimed not only at a cataloging of the national provisions generating overregulation in the



implementation of the NRDP, but also recommendations for simplifying procedures, programming and procedural documents (e.g. applicant's guide and AFRI procedures ) for the purpose of reducing administrative burdens targeting both beneficiaries and authorities involved in program management and generating in time positive effects on EAFRD level of absorption and improvements in the implementation framework of the future rural development program.

## 2.2. Presentation of the structure of the evaluation study

This evaluation study includes detailed information on: the context of the implementation of the NRDP 2014-2020, the main elements and methodological tools applied during the evaluation process and the presentation of the measures and their implementation flow by reference to the objectives of the sub-measures, eligible beneficiaries, and the role of the institutions involved in the implementation.

Last but not least, at the level of the evaluation study, the national provisions generating the overregulation in the implementation of the NRDP are identified and analyzed, the extent to which the eligibility criteria and the selection principles as well as the commitments provided in the action sheets favored the submission of projects contributing the simplification measures that have favored the implementation of the program are identified and additional simplification measures are proposed - including the results of the benchmark analysis on the implementation of the Rural Development Programs from Ireland, Veneto, Tuscany (Italy) and Aragon (Spain) respectively.

Among the general recommendations of the study we mention the process of extending the electronic module for contracting and implementation phases up to the end of this programming period, reducing the number of supporting documents requested by the beneficiaries (especially removing the request for denials issued by public authorities) and not lastly the conduct of inter-institutional consultations before making legislative changes with impact on the beneficiaries of NRDP as well as carrying out impact analyzes before modifying the legislative framework so that they do not affect the implementation of the program or generate additional administrative burden or even risks for the beneficiaries NRDP. With these aspects considered, the conclusion of the analysis showed that, starting from the exhaustive definition of the concept of overregulation, no additional requirements/provisions were identified that would affect the implementation of the Programme as a whole. However, aspects of the various procedural steps that may lead to difficulties or administrative burdens have been identified either for the beneficiaries or for the authorities involved in the management of the NRDP 2014-2020, the analysis proposing in this respect targeted recommendations aimed at mitigating the generated effects.



### III. The Evaluation context

In the 2014-2020 programming period and at the next multi-annual financial exercise, a series of cross-cutting objectives will be closely monitored both at European and national level, including closer scrutiny of how European funds are spent, a stronger focus on the results achieved through funding programs and on the development of program implementation models that reduce the burden and administrative costs generated for both beneficiaries and public authorities.<sup>1</sup>

The literature review<sup>2</sup> revealed that the effects of overregulation are visible throughout the programming cycle, generating administrative costs and burdens, as well as the risk of errors in implementation. While management authorities are more often affected by the growing administrative costs generated by this phenomenon, small-scale beneficiaries (such as NGOs, individuals and small businesses) are particularly affected by the administrative burden generated, this category having limited implementation capabilities. Consequently, the increased the administrative burden and the need for greater implementation capacity, the non-reimbursable financing options become more and more unattractive - a situation that translates into a number and a level of lower quality of the projects.

Regarding the elements of overregulation, the literature indicates that, in terms of the implementation of rural development programs at European level, these are generated both at the stage of program development and at the stages of implementation, payment and control . Thus, we have identified:

- Overregulation practices generated at the level of eligibility criteria. These start from the stage of program development, at the time of its implementation, the beneficiaries are confronted with restrictive eligibility conditions (including very restrictive requirements, requests for numerous supporting documents to demonstrate the fulfilment of the conditions, as well as a variation in the interpretation of these conditions between funding sessions).
- Overregulation elements generated at the level of agri-environment commitments that include very ambitious targets that cause difficulties both in their development and their implementation / verification (e.g. rules setting buffers and levels of nitrogen generation ). As a result, these practices generate errors identified during on-the-spot checks (beneficiaries encountering difficulties in reaching the targets) or even cause difficulties in the verification process, causing delays in payments and even penalties.

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<sup>1</sup> European Commission (2017): Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - The Future of Food and Agriculture (Brussels, European Commission) COM (2017) 713final.

<sup>2</sup> European Parliament (2014): Gold-plating in the EAFRD. How do national rules unnecessarily add to complexity and, as a result, increase the risk of errors? (Brussels, European Parliament), IP / D / ALL / FWC / 2009-056.





- Overregulation elements generated at the level of procurement regulations. These intervene in particular at the level of implementation of the programs, but they are particularly affected by the stages of control and payment. These include either the unnecessary extension of procurement obligations to private beneficiaries or the rigidity of the interpretation of the implementing regulations, translating into delays in procedures as well as in a high degree of error.
- Overregulation practices generated by payment procedures that cause difficulties both in advance payments and in final payments.
- Overregulation practices generated at the level of the control and verification procedure that translate into over-checks and the imposition of ex-post administrative conditions.<sup>3</sup>

Analyzing the programme document as well as the recommendations resulting from the implementation of the MARD project „Analyzing the administrative burden of beneficiaries of Structural and Investment European Funds”, a number of priorities assumed by the MA NRDP have been identified during the current programming period, the overall objective being to streamline the implementation of the program, to reduce the timeframe between the submission and selection of funding applications and to simplify procedures in support of beneficiaries. These detailed priorities at the level of the programming document include:

- Avoiding the elaboration of the ad hoc policy and the systematic checking of the legislative proposals towards the NRDP requirements for ensuring legislative coherence,
- Improving the communication on NRDP and the implementation requirements with all institutions involved in correlating with frequent legislative changes,
- Gradual introduction of the possibility of online submission in order to reduce the time period as well as the costs necessary for the submission of projects,
- Reducing the number of documents requested when submitting projects, leaving a series of documents to be submitted for contracting, for streamlining the process of submitting projects,
- The availability of model projects for financing certain types of investments made through NRDP in order to support the potential beneficiaries of the program in the elaboration of the projects,
- Continuous evaluation of the projects submitted in order to shorten the deadlines from the submission to the contracting of the projects,
- Elaboration of the reference price database for specialized machinery, equipment and equipment that can be purchased through the investment measures related to NRDP 2014-2020 in order to reduce the administrative burden at the level of the beneficiaries,
- Development of standard models by AFIR to assist beneficiaries in correctly applying procurement procedures,
- Use of standard costs for the establishment and conversion of fruit plantations under sub-measure 4.1a for table grapes within sub-measure 4.1 and under Sub-Measure 8.1 for crop establishment works. Standard costs will lead to eliminating private purchases and ensuring reasonable cost,
- Use of standard infrastructure costs (GD 363/2010) to ensure cost-consciousness.

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<sup>3</sup> *Idem.*



Considering the detailed progress at the level of the Annual Implementation Reports of the NRDP 2014-2020, a series of measures to simplify and remedy the difficulties encountered by the beneficiaries have been registered so far, including:

- Reducing the number of requested documents to potential beneficiaries including reducing the number of permits / approvals requested during the project submission phase (especially in Measure 4), with a clear separation between the documents requested in the evaluation and selection phase and those requested in the contracting phase;
- Extending the deadlines from notifying the selection of applications to contracting, in cases where the necessary endorsements require longer deadlines;
- Reduction of time periods both in the case of notifications of changes in projects and in the case of the notification of purchase dossiers, in conjunction with the extension of the purchase price database and its regular updating
- Making technical meetings with representatives of the central administration and civil society institutions in order to finalize the applicant's Guides and working procedures;
- Increasing the level of compensation payments as a result of the revaluation of additional costs induced by limiting factors (in the case of Measure 13).
- Accessing databases such as those of the NTRO, NSVFSA, the National Cadastre Office (and in the process of finalizing ANAF) based on protocols, so that applicants / beneficiaries will no longer have to bring these documents;
- Completing the reference price database;
- Online submission of applications for funding for all measures and online submission of payment applications.

The implementation of these measures as well as other initiatives that will be detailed in Chapter V of this analysis has led to the absence of substantial overregulation that severely affects the degree of attractiveness of the measures and the degree of access to them. However, additional possibilities of procedural simplification have been identified in the various sub-measures as well as cross-cutting issues that could have a positive long-term impact and are also applicable at the next programming period.



## IV. Methodology of the Evaluation Study

The proposed methodological approach for the elaboration of the Evaluation Study on the Impact of overregulation on the implementation of the NRDP 2014-2020 includes a mix of methods combining the literature review, collection and analysis of secondary data, questionnaire survey, interviews, case studies, focus groups and benchmark analysis.

The **literature review** presented a cross-cutting method for all evaluation questions, allowing for a clarification of the concept of overregulation (delimited by the actors that generate the additional provisions and depending on the reasoning and purpose pursued at the time the provisions are generated). The **collection and analysis of secondary data** has substantiated the methodological approach attributed to evaluation questions and has allowed concentration on procedural aspects (eg requirements included in the Applicant's Guide that have led to difficulties for beneficiaries in accessing sub-measures, provisions in relevant national legislation that have generated impediments in timely implementation of the program, need for simplification of working procedures in the case of sub-measures to facilitate their access by applicants, etc.) and on preliminary achievements (eg analysis of the correlation between the degree of access and the degree of overregulation at level of sub-measures, analysis of the impact of simplifications carried out in the context of the implementation of the NRDP, etc.). Both the internal resources of the program (eg the program document, guides and technical sheets, progress reports, the NRDP evaluation study, the status of the contracted projects up to the level of June 2018) as well as external resources (eg the European Commission Guidelines) were used for the review of the literature.

Based on the collected information, **analysis matrices** were developed for each sub-measure analyzed in the study to facilitate a comparative approach, mirroring on the one hand the requirements included in the applicant's guides broken down by the procedural phases/sub-phases in which shall comply with the equivalent provisions set out in the relevant European legislation and the applicable provisions established under national law. The procedural analysis matrices also included comparative evaluation sections and considered as possible elements of overregulation the requirements identified in the documents related to the sub-measures that are not found in the European and national normative framework. The findings from the use of this tool for all study sub-measures were a solid starting point for other research tools. Consequently, these first findings could be analyzed (respectively validated) in a clearer context, based on the results of interviews and focus groups, as well as the application and processing of the questionnaires.

In order to collect the opinions of the relevant key actors and data and information that underpin the evaluation process, one of the quantitative data collection methods was the questionnaire based on a survey. In this respect, questionnaires (including both closed and open questions, dichotomous questions and questions with multiple pre-edited answers) were structured according to the typology of the respondents:

- Questionnaire addressed to the authorities involved in the implementation of the NRDP 2014-2020 at sub-measure level (MA NRDP, AFRI, APIA);



- Questionnaire addressed to beneficiaries of projects funded through NRDP 2014-2020;
- Questionnaire addressed to non-beneficiaries, defined as applicants under the 2014-2020 NRDP but which did not receive support from the selection stage;
- Questionnaire addressed to potential beneficiaries (for sub-measures 15.1, 16.1 and 16.1a) identified as applicants under the 2014-2020 NRDP that had not been covered when the questionnaires were applied at the contracting stage;
- Questionnaire addressed to representatives of the consultancy sector.

In the case of the beneficiaries of the NRDP 2014-2020, non-beneficiaries, potential beneficiaries and representatives of the consultancy sector, the questionnaires were electronically disseminated (via email) and could be accessed and filled in on a dedicated electronic platform.

Following the transmission of on-line questionnaires to beneficiaries, non-beneficiaries, potential beneficiaries and consultants, potential respondents were contacted by phone within 4 weeks to ensure an optimal response rate.

The information gathered through the analysis of the existing documents was completed and contextualized based on a total of **15 semi-structured interviews** with representatives of the institutions involved in the implementation and management of NRDP 2014-2020 and with key actors representing beneficiaries, non-beneficiaries and the consultancy sector .

In order to collect more detailed data at the level of sub-measures, **13 case studies** were carried out, one for each of sub-measures 4.1, 4.2, 6.1, 6.2, 6.3, 6.4, 19.1, 10.1, 11.1, 11.2, 13.1, 13.3. As a result of time constraints, case studies were carried out by applying detailed questionnaires that included both open questions and closed questions with multiple responses to collect detailed information on the complexity of the specific requirements of each stage of project implementation.

In order to discuss and validate the preliminary observations, two focus groups that brought together the beneficiaries of the NRDP 2014-2020, representatives of the public authorities involved in the implementation of the program, representatives of the consultancy sector and of the relevant associations and federations were also carried out at the level of the project. The **focus group** is generally a qualitative research method, taking the form of organized and structured discussion with a select group of people to get information on their views and experiences. A total of two events took place on November 27, 2018, in Craiova, and on 11 December 2018 in Bucharest.

The objective of the events was to collect new information, based on plenary discussions, from key actors directly involved in the implementation of the program and relevant stakeholders, as well as validate preliminary observations based on data collected through the survey based on questionnaires and interviews to answer the evaluation questions of the study. Starting from the evaluation questions concerned, the topics of discussion in the focus groups addressed the following issues:

- Requirements that have been set at the program level and which have created a high degree of procedural complexity at the level of program and program management authorities and applicants / beneficiaries;





- Proposals/Suggestions to reduce the administrative burden and the degree of complexity of administrative procedures;
- Simplifications made to streamline program implementation and their effects, both from the perspective of beneficiaries and program authorities.

Last but not least, in order to facilitate the identification of viable solutions in order to reduce the administrative burden in the implementation of NRDP, the expert team used the **benchmark analysis method** (comparative analysis). **The benchmark analysis** of the issues of overregulation under the NRDP carried out in this study was considered relevant, being a useful technique in formulating the conclusions and recommendations of the evaluation study. The purpose of the analysis was to explore how to implement rural development programs at the level of other Member States and regions so as to identify approaches that can be replicated at national level to streamline the implementation of the 2014-2020 NRDP. In this respect, four reference cases have been proposed - namely the Republic of Ireland and the regions of Veneto, Tuscany (Italy) and Aragon (Spain). These examples have been selected from the perspective of the National Rural Development Programs, and the high access rate of available funds is also considered.

## V. Presentation of the NRDP sub-measures and their implementation flow

The purpose of this chapter will be to build the basis to the answers of the 5 evaluation questions, following the synthesis and overall presentation of the NRDP 2014-2020 sub-measures envisaged in the evaluation study. At the same time, the related procedural flow will be analyzed, considering its fluidity as well as any administrative difficulties it generates either for the beneficiaries or for the authorities involved in the implementation of the program.

Based on the data collected for each sub-measure the additional requirements that can be framed within the defining limits of the overregulation are identified, the effects generated, their intensity and the degree of complexity imposed by the requirements (the green color symbolizing a low degree of complexity, the color yellow a medium degree, and red color a high degree of complexity). The measures adopted during this programming period are then identified and analyzed in order to reduce the administrative burdens and the selection criteria are briefly presented, following the variation in time of the scoring mode. The analysis is complemented by proposals for reducing the administrative burden in different procedural stages, while establishing the potential effects generated by their implementation.

### SM 1.1 Support for vocational training and skills acquisition

#### Overview of the sub-measure

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Improve the technical and economic knowledge specific to the practice and management of agricultural and agri-food activities of farmers as well as the general management of the farm;</li> <li>Acquire and improve knowledge and skills on environmental issues, climate change, efficient management of natural resources, and implementation of agri-environmental and climate commitments and organic farming.</li> </ul>
<b>Eligible Beneficiaries</b>	<ul style="list-style-type: none"> <li>Public or private entities active in the field of adult vocational training and fulfilling the eligibility and selection criteria.</li> </ul>
<b>Eligible Activities</b>	<p>Short-term vocational training courses (eg: initiation, retraining) with differentiated training periods, depending on the level of training of the final beneficiaries, as well as on the training program theme.</p> <p>Training programmes seek to:</p> <ul style="list-style-type: none"> <li>Improve the knowledge of farmers to practice agricultural and innovative techniques and technologies, including through the results of research especially young farmers who will benefit from support under sub-measure 6.1, farmers operating in small farms and benefiting from support under -Measure 6.3 -32 hours maximum;</li> </ul>



	<ul style="list-style-type: none"> <li>• Improve knowledge of community standards at farm level, manure management, improvement of production quality - especially young farmers who will receive support through the sub-measure 6.1 - 24 hours maximum;</li> <li>• Diversification of activities on agricultural holdings - especially young farmers who will benefit from support under sub-measure 6.1, farmers operating in small farms and who will receive support through the sub-measure 6.3- 24 hours maximum;</li> <li>• Acquiring and improving knowledge on sustainable land management, acquiring knowledge on the implementation of agri-environmental and climate commitments and organic farming, addressing at least the issues of completing and submitting commitments and payment requests, the management measures applicable at the level necessary to comply with the basic requirements and the specific requirements of the commitments, as well as the acquisition of production methods compatible with the maintenance and improvement of the landscape, namely environmental protection and adaptation to the effects of climate change and reduction of GHG concentrations in the atmosphere - of agri-environment and climate measure - measure 10 - 40 hours maximum;</li> <li>• General management of the farm (accounting, marketing, ICT knowledge, etc.) - especially young farmers who will benefit from support under sub-measure 6.1, farmers operating on small farms that will benefit from support under sub-measure 6.3 - 40 of maximum hours.</li> </ul>
<p><b>Procedural Flow</b></p>	<p>Deposition stage:</p> <ul style="list-style-type: none"> <li>• Enrollment in the on-line training providers' platform in the Eligible Vocational Training Services Register;</li> <li>• Verification of the fulfillment of the eligibility conditions by DGRD MA NRDP/CRDC;</li> <li>• Loading the application for funding and the documents annexed to it by training providers enrolled in the Eligible Register of Eligible Companies;</li> <li>• Verification of the fulfillment of the eligibility conditions for the applications for funding submitted by the training providers by the DGRD MA NRDP / CRDC;</li> <li>• Evaluating the application for funding and awarding the score based on the selection criteria by DGRD MA NRDP / CRDC;</li> </ul> <p>Selection stage:</p> <ul style="list-style-type: none"> <li>• Ranking of projects according to the score obtained through the platform and selection of funding applications (by the Selection Committee within the MA NRDP);</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>• Applicant uploads support documents for participants, suppliers and partners (if applicable);</li> <li>• Verification of submitted documents and verification of compliance with the eligibility and selection criteria (by RCRIF);</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>• Upload by the beneficiary of the technical documents justifying the realising of the activities;</li> </ul>



	<ul style="list-style-type: none"><li>• Verification of technical documents and communication through the platform on their approval / non-approval (by RCRIF);</li><li>• Submission of the payment request to RCRIF (by the beneficiary);</li><li>• Drawing up payment certificates and making payments to eligible beneficiaries (by RCRIF).</li></ul> <p>Monitoring stage:</p> <ul style="list-style-type: none"><li>• Ensuring the live streaming conditions (by the beneficiary);</li><li>• Making field visits via live streaming and completing the "Field Checklist" (by RCRIF).</li></ul>
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### **Analysis of the implementation flow of the sub-measure**

Sub-measure 1.1 is implemented through the Rural Development Directorate General Managing Authority for the National Rural Development Program, the County Rural Development Compartments, the Rural Investment Financing Agency and its territorial structures - Regional Centers.

Implementation of sM 1.1 involved a considerable administrative effort, given that the progress was based on calls for project proposals and subsequently accessing the sub-measure through the use of standard unit costs and the web platform for the selection of financing applications submitted.

In exceptional cases defined in the national implementation documents of the sub-measure, the evaluation and selection of beneficiaries may be carried out on the basis of a procedure developed by the MA NRDP in accordance with the legislation on the award of public procurement contracts, harmonized with the Community legislation on public procurement.

Once the option to use standard unit costs and the possibility to use the web platform managed by AFIR were introduced, the corresponding implementation flow sM 1.1 has been simplified from a procedural point of view, being split into two main administrative steps<sup>4</sup>:

- i. Stage I - vocational training providers are registered in the on-line platform and are checked by DGRD MA NRDP, respectively CDRCs regarding the fulfillment of eligibility conditions in order to be enrolled in the "Register of Eligible Vocational Training Services " and
- ii. Stage II - eligible training providers, which are listed in the "Register of Eligible Vocational Training Providers" can submit applications for funding (vocational training projects) to be assessed by the territorial units of DGRD MA NRDP, respectively CRDCs and Lists of selected / unselected projects are issued.

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<sup>4</sup> Applicant's Guide to access sub-measure 1.1 "Support for Vocational Training and Skills" through the use of standard unit costs, approved by MADR Order no. 584 / 12.29.2017





**Additional identified requirements (not derived from European and national rules) and potential effects**

<b>Additional Requirement</b>	<b>Intensity of the requirement on the Applicant</b>	<b>Intensity of the requirement over authorities in charge of submeasure management and implementation</b>	<b>Degree of complexity of the requirement</b>
Each contract is checked on the ground via live streaming. For this reason, during training, the provider of professional training has the obligation to ensure the existence of an Internet-connected camcorder with platform access so that AFRI experts can at any time be able to carry out checks on the conduct of courses according to the agenda, conditions logistics, the existence of the number of participants in the classroom, etc.	Additional tasks assigned to the beneficiary by the obligation to install video cameras in the training course location. On the other hand, it is noted that the requirement for live streaming verification also has the role of simplifying the course monitoring procedure as the training provider no longer has the obligation to ensure the presence of a person in field visits by AFRI experts.	Additional tasks for the authorities involved to view and verify video recordings.  On the other hand, the possibility of verifying live streaming training reduces the administrative burden at the level of the authorities involved by eliminating or reducing the number of field trips.	
At the stage of signing the financing agreement, the applicant must submit tax attestation certificates demonstrating that he has fulfilled his obligations to pay taxes, taxes and social security contributions to the state budget	Additional administrative burden for applicants, as these documents could be requested directly from the competent institutions	NA	

**Actions to reduce administrative burdens**

In the current programming period, several simplification measures have been undertaken compared to the last programming period or from one project submission to another.

Thus, the main actions taken to reduce the administrative burden at the level of the beneficiaries and the authorities involved in the implementation of the NRDP 2014-2020 are:

- Simplification of the implementation of sM 1.1, going from implementation through public procurement, to project-based implementation and subsequently to the use of the web platform for the selection of financing applications submitted;
- Another simplification measure for both beneficiaries and authorities was to introduce the option to use standard unit costs, which reduced the number of supporting documents submitted by the beneficiaries to the settlement of the expenditure incurred under the project;
- In the case of the first two calls for projects, the submission was made to the CDRC center, closer to the beneficiaries, or the region or county of the implementation of the activities, compared to the last programming period when the documents were physically deposited at MARD headquarters.

### **Actions carried out in other Member States/regions to reduce administrative burdens**

In Ireland, in order to reduce administrative burdens and increase the effectiveness of this sub-measure, the possibility of providing financial compensation to farmers was considered. Thus, each participant farmer is compensated for the unit of time (replaced farmer's cost) and travel costs associated with attending national knowledge transfer / national event meetings accredited by the Department of Agriculture, Food and Marine Space (DAFM).

In Veneto, in order to reduce administrative burdens, it was decided to apply a standard unit cost per hour for collective training initiatives (EUR 155.00) and for individual training initiatives (EUR 70.00).

### **Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the programme)**

Analyzing the state of implementation of sM 1.1 at the end of June 2018, it can be noticed that out of the total of 32 projects contracted, no contract was terminated, which shows that the sub-measure was implemented without significant problems encountered.

No. contracted projects	No. completed projects	No. terminated projects
32	0	0

### **Analysis of selection criteria**

In the first two calls for projects launched in 2016, 5 selection principles were applied, the selection principle 1, regarding the qualitative and technical level of the curriculum of the course, the experience and / or qualification of trainers and the selection principle 5, regarding the efficiency of the use of funds, with the most significant weight - 35 and 30% of the total score.

It is noted that with the selection announcement launched in 2018 and the introduction of standard unit costs, the number of selection criteria has been reduced, focusing only on the prioritization of qualitative projects in terms of course curriculum and the experience of trainers. Compared to the first two calls for



projects, the principles for effective and accelerated implementation of the project, the representativeness of the partnership and the adaptation of the course theme to the needs of the target group in a given territory were eliminated.

*Selection criteria applied in the call for proposals no. 1/2016 Training for farmers holding commitments under Measure 10 - Agri-environment and Climate and Call for Proposals no. 2/2016 Vocational training for farmers, in particular beneficiaries of sub-measures 6.1 and 6.3*

Selection Criteria	Maximum awarded score
SC 1 The principle of the qualitative and technical level regarding the course curriculum, the experience and / or qualification of the trainers	- maximum 35 points
SC 2 The principle of effective and accelerated implementation of the project	- maximum 10 points
SC 3 Partnership principle with representative associations at national level and educational institutions and / or research development institutions	- maximum 15 points
SC 4 The theme and target group principle, which involves adapting and detailing the general theme set to the needs of the target group in a given territory depending on the area of project area	- maximum 10 points
SC 5 The principle of the efficiency of the use of funds	- maximum 30 points

*Selection criteria applied in the notice published on 08.02.2018 on the selection of financing applications submitted using the standard unit cost*

Selection Criteria	Maximum awarded score
SC 1 Qualitative and technical level of course curriculum	- maximum 40 points
SC 2 Trainers experience	- maximum 60 points

No specific problems have been identified regarding the application and observance of the selection criteria applied at sM 1.1, which are considered relevant from the perspective of project hierarchy with an effective contribution to the achievement of the NRDP strategic objectives.

### **Proposals to reduce administrative burdens**

Stage	Proposals to reduce administrative burdens	Expected effects
Application	N.A.	
Selection	N.A.	

Stage	Proposals to reduce administrative burdens	Expected effects
<b>Contracting</b>	Conclude several protocols with qualified institutions to provide information on applicants, such as NAFA (to provide data on fiscal balances and other financial aspects).	Reducing the number of documents requested by applicants.
<b>Implementation</b>	N.A.	
<b>Monitoring</b>	Relaxing the conditions for checking and monitoring via live streaming by considering them as an alternative to other ways to demonstrate the conduct of training activities (e.g. photos, presence lists, IT platforms).	Reducing the beneficiary's tasks to ensure the installation of video cameras in the training venue.

### sM 1.2 Support for demonstrative activities and information actions

#### Overview of the sub-measure

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Raising the awareness of people employed in the agricultural and food sectors in specific areas in which they operate, as well as environmental protection or other areas of general interest. As a result, an understanding of the 2014-2020 NRDP targets is expected.</li> <li>Increasing the awareness of farmers about the possibility of introducing new innovative technologies, developing innovative capacities in the agro-food chain.</li> <li>Information on the possibility of farmers accessing and contributing to mutual funds. As a result, access to mutual funds is expected to restore production potential and compensate for income losses. Farm risk management involves improving the knowledge and information available to minimize risk.</li> </ul>
<b>Eligible Beneficiaries</b>	Public and / or private entities with information / demonstration and / or dissemination activities.
<b>Eligible Activities</b>	<ul style="list-style-type: none"> <li>demonstrative activities: will be achieved through practical sessions aimed at:               <ul style="list-style-type: none"> <li>new crop protection methods or specific production techniques, eg biodiversity conservation or adaptation to climate change. The activity can take place on a farm or other sites, such as: research centers, exhibitions, trade fairs, etc., and the beneficiaries can be especially farmers who will receive support through the ecological agriculture measure (measure 11 ), farmers who foresee investments in equipment and irrigation under sub-measure 4.1, 4.3 (OWUI members implementing irrigation projects,</li> </ul> </li> </ul>



	<p>including production methods and techniques leading to water efficiency and climate change).</p> <ul style="list-style-type: none"> <li>○ information action: dissemination of information on: <ul style="list-style-type: none"> <li>○ Agriculture (e.g. biodiversity conservation on HNV meadows or important meadows for important bird and butterfly species, soil and water protection on arable land, preservation of biodiversity on arable land), climate change (including adaptation of agricultural practices to the effects of climate change) , the agri-food sector, in order to raise the awareness of the target group on the knowledge relevant to the work done at the workplace. Participants may be farmers, producer groups (sub-measure 9.1), farmers in the partnerships set up to implement sub-measure 16.4, potential participants in mutual funds, small processors in the micro-enterprise category and small enterprises in the agro-food industry sub-measure 4.2), farmers operating in small farms that will benefit from sub-measure 6.3.</li> <li>○ Identifying technological solutions and agricultural practices that provide alternatives to drought control through irrigation methods and counteract the effects of drought, climate change, farming practices and methods to enable farmers to manage water resources efficiently at farm level; and consequently, better resistance to the impact of climate change, especially farmers who foresee investments in equipment and irrigation under sub-measure 4.1, OWUI members implementing projects under sub-measure 4.3.</li> </ul> </li> </ul>
<p><b>Procedural Flow</b></p>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>• Filling in the application form and the annexes on paper and filing at the CRDC headquarters;</li> <li>• Administrative check of the CRDC application file;</li> <li>• Verifying the eligibility conditions for the grant application and the eligibility of the project by CRDC;</li> <li>• Sample verification of the administrative compliance and the eligibility conditions of the grant applications, drawing up the Evaluation Report and publishing it by the MA NRDP;</li> <li>• Evaluation on the basis of selection criteria, such as the evaluation of projects Selection of projects by the Evaluation Committee, preparation of the Evaluation Report and publication by the Evaluation Committee MA NRDP;</li> </ul> <p>Selection stage:</p> <ul style="list-style-type: none"> <li>• Report and publishing it by the NRDP;</li> <li>• Recording appeals, setting up the Complaints Dispute Resolution Commission and making Complaints Reports;</li> </ul> <p>Contracting Stage:</p> <ul style="list-style-type: none"> <li>• Demonstration of the financial capacity necessary to carry out the information activities by the applicant (presentation of the financial statements of the applicant, registered with the Financial Administration (balance sheets, forms 10 and 20 for years n, n-1, n-2) tax);</li> <li>• Verification of AFIR certification by AFIR;</li> </ul> <p>Implementation stage:</p>





	<ul style="list-style-type: none"> <li>• Drawing up and filing the payment application file by the beneficiary;</li> <li>• Verification and authorization of the payment request by AFRI;</li> </ul>
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**Analysis of the implementation flow of the sub-measure**

Sub-measure 1.2 is implemented by the Directorate-General for Rural Development - Managing Authority for the National Rural Development Program through the County Rural Development Compartments, the Rural Investment Financing Agency and its territorial structures.

Analyzing the procedural flow of sM 1.2 implementation in view of the possible administrative burdens it generates at the level of the applicants and the authorities responsible for managing the program, it was noted that the stages of submission of the application file (by the requirement to prepare and submit the documentation in the format (by asking for documents demonstrating the lack of fiscal and social debts) are the ones that cause the most difficulties for the beneficiaries, which is also confirmed by the conclusions of the field research methods (questionnaires, focus groups, etc.).

**Additional identified requirements (not derived from European and national rules) and potential effects**

<b>Additional requirement</b>	<b>Intensity of requirement on the Applicant</b>	<b>Intensity of requirement over authorities in charge of sub-measure management and implementation</b>	<b>Degree of complexity of the requirement</b>
Completion of the application form and the annexes in paper form and their submission in physical format.	Difficulties in preparing and submitting the application for funding and other supporting documents at the CRDC headquarters.	Difficulties in registering and checking the funding application file.	
For funding applications that are selected for funding, applicants must file with AFRI, prior to contracting, tax attestations attesting the absence of outstanding tax and social debts.	Additional administrative burden for applicants, as these documents could be requested directly from the competent institutions.	NA	



### **Actions to reduce administrative burdens**

The main simplification measure adopted to reduce the administrative burden at sM 1.2 was the introduction of the possibility of submitting the application file at the CRDC headquarters, or closer to the beneficiaries or the region / county for implementing the project activities compared to the previous period when the documentation was submitted to the MARD headquarters.

### **Actions carried out in other Member States/regions to reduce administrative burdens**

For this sub-measure, the benchmark analysis did not identify specific simplification actions other than those mentioned in sM1.1.

### **Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the programme)**

The state of implementation of sM 1.2 is incipient. Until the end of August 2018, 2 calls for projects were launched - Call for proposals 1/2018 "Information actions for farmers" with ongoing submission and Call for Proposals 2/2018 "Demonstration activities for farmers benefiting from support through the organic farming measure (M11) ", with submission between 09.08.2018 - 09.11.2018. In the Call for Proposals 1/2018, 5 projects were submitted in August, none of which were contracted, while no project was submitted under Call for Proposals 2/2018.

### **Analysis of selection criteria**

From the analysis of the criteria applied for the selection of projects, the two calls launched in 2018 show that the principles related to the qualitative and technical level of the theme of the action, the experience and / or qualification of the proposed staff, the adaptation of the general theme to the needs of the target group in a certain territory and the efficiency of the use of the funds have the highest share of the total score given, having a high level of relevance from the perspective of project hierarchy with an effective contribution to the achievement of the NRDP strategic objectives.

<b>Selection Criteria</b>	<b>Maximum score awarded</b>
SC 1 The principle of the qualitative and technical level regarding the theme of the action, the experience and / or qualification of the personnel	- maximum 30 points (Call for Proposals No. 1/2018) - maximum 30 points (call for proposals No 2/2018)
SC 2 Partnership principle with representative associations at national level and educational institutions and / or research development institutions	- maximum 10 points (call for proposals No. 1/2018) - maximum 10 points (Call for Proposals No. 2/2018)



Selection Criteria	Maximum score awarded
SC 3 The theme and target group principle, which involves adapting and detailing the general theme set to the needs of the target group in a given territory depending on the area of project area	- maximum 30 points (call for proposals No. 1/2018) - maximum 20 points (call for proposals No 2/2018)
SC 4 The principle of effective and accelerated implementation of the project	- maximum 10 points (call for proposals No. 1/2018) - maximum 20 points (call for proposals No 2/2018)
SC 5 The principle of the efficiency of the use of funds	- maximum 20 points (call for proposals No. 1/2018) - maximum 30 points (call for proposals No 2/2018)

### Proposals to reduce administrative burdens

Stage	Proposals to reduce administrative burdens	Expected effects
Application	Introducing the possibility of submitting the application file electronically	Reduce administrative burden on applicants by simplifying documentation preparation and submission
Selection	N.A.	
Implementation	Introducing the possibility of using standard unit costs	Reducing the number of supporting documents submitted in order to reimburse the costs incurred by the beneficiaries
Contracting	Conclude several protocols with qualified institutions to provide information on applicants, such as NAFA (to provide data on fiscal balances and other financial aspects) or the Romanian Police (for obtaining the tax record).	Reducing the number of documents requested by applicants
Monitoring	N.A.	

**SM 2.1 Support for help with the use of counseling services**

**Overview of the sub-measure**

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Facilitating advisory services to young farmers and small farmers to prepare the business plan and manage its implementation in order to develop the farm to orientate towards the market and to improve its management in the context of compliance with Community standards. As a result, in particular, access to sub-measures 6.1 and 6.3 is expected.</li> <li>• Counseling micro-enterprises and small businesses in rural areas to initiate and / or develop business through non-agricultural activities, including by developing business plans and implementing them. As a result, in particular, access to sub-measures 6.2 and 6.4 is expected.</li> <li>• Provision of advisory services for the establishment and development of associative forms of farmers. The result will be the reduction of the degree of fragmentation and the increase of the size of the agricultural holdings, as well as the increase of the competitiveness of the business.</li> <li>• Counseling beneficiaries who have agro-environment commitments, organic farming (M10, M11). This will facilitate the provision of the prerequisites for the implementation of agricultural practices that contribute jointly to ensuring the sustainable management of natural resources (biodiversity, soil, water) as well as reducing GHG and ammonia emissions from agriculture. At the same time, promoting appropriate production methods will provide a better adaptation to the effects of climate change, increasingly manifested by extreme manifestations of phenomena. By providing the necessary skills for implementation and commitment through access to counseling services, the beneficiaries of the measure are expected to provide the premises for achieving the objectives and to maximize the impact of the budgetary effort for agri-environment and climate commitments.</li> <li>• Counseling for qualitative reorientation of production, application of competitive production practices, compliance with community standards, and acquiring the knowledge necessary to manage a holding, especially for beneficiaries of sub-measures 4.1 and 4.2. As a result, agricultural holdings are expected to become economically viable and environmental and climate performance.</li> </ul>
<p><b>Eligible Beneficiaries</b></p>	<ul style="list-style-type: none"> <li>• Providers of counseling services that are public and / or private entities set up in accordance with the legislation in force.</li> </ul>
<p><b>Eligible Activities</b></p>	<ul style="list-style-type: none"> <li>• advisory activities on farm modernization, enhancing competitiveness, sectoral integration, innovation and market orientation, and promoting entrepreneurship;</li> <li>• meeting national and community standards, including workplace safety standards or farm safety standards;</li> </ul>

	<ul style="list-style-type: none"> <li>• preparing and managing the implementation of the business plan, including addressing environmental issues, to:             <ul style="list-style-type: none"> <li>○ a small farm;</li> <li>○ an installation of young farmers.</li> </ul> </li> <li>• initiating and / or developing non-agricultural activities for micro-enterprises and small enterprises in rural areas;</li> <li>• counseling and animation activities for the establishment and development of agricultural cooperatives and producer groups;</li> <li>• advisory activities for beneficiaries of the agri-environment and climate measure, as well as organic farming, including compliance with the cross-compliance standards established under Title VI, Chapter I of Regulation (EU) 1306/2013;</li> <li>• advisory work on farm-level obligations arising from regulatory requirements in management (SMR) and / or from good agricultural and environmental standards under Title VI, Chapter I of Regulation (EU) 1306/2013;</li> <li>• advise on the requirements resulting from the implementation of Art. 55 of Regulation (EC) No 1107/2009, in particular compliance with the general principles of Integrated Pest Management referred to in Art. 14 of Directive 2009/128 / EC;</li> <li>• advice on encouraging investment to improve / save on water consumption, the use of renewable energy in the agri-food sector, waste processing, waste and the reduction of greenhouse gas and ammonia emissions in agriculture;</li> <li>• advice on investments in the processing industry that will aim to reduce the environmental impact by encouraging new ways of storing agri-food production in order to increase food safety, by making products more suited to market requirements, applying waste utilization methods and water treatment for environmental protection as well as the requirements resulting from the implementation of art. 11 (3) of the Water Framework Directive.</li> </ul>
<p><b>Procedural Flow</b></p>	<p>Stage of planning / preparation, including market consultation:</p> <ul style="list-style-type: none"> <li>• Drawing up the Annual Public Procurement Program for Counseling Services (DGRD MA NRDP);</li> <li>• Verifying, evaluating and centralizing the counseling actions / projects, drawing up and approving the Annual Public Procurement Plan;</li> <li>• Carrying out the market consultation process before launching the public procurement procedure;</li> <li>• Elaboration of award documentation;</li> </ul> <p>Stage of organization of procedure and award of contract:</p> <ul style="list-style-type: none"> <li>• Transmission of award documentation in SEAP (DGRD MA NRDP)</li> <li>• Initiation and implementation of the public procurement procedure (DGRD MA NRDP)</li> </ul> <p>Awarding of the contract:</p> <ul style="list-style-type: none"> <li>• Awarding the contract / framework agreement (DGRD MA NRDP);</li> <li>• Verifying the Public Procurement Process (AFRI);</li> <li>• Conclusion of the contract with the winning economic operator;</li> </ul>





	<ul style="list-style-type: none"><li>• Signing of the public procurement contract by the economic operator;</li></ul> Monitoring implementation of the contract: <ul style="list-style-type: none"><li>• Preparation of Activity Reports by the Service Provider;</li><li>• Monitoring the execution of the contract, by checking, approving and approving the activity reports by the DGRD MA NRDP;</li><li>• Monitoring compliance with contractual and technical obligations by CRDC and DGDR MA NRDP</li></ul> Completion of the public procurement contract: <ul style="list-style-type: none"><li>• Issuing of the documentary evidence by DGRD MA NRDP.</li></ul>
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### ***Analysis of the implementation flow of the sub-measure***

The implementation flow of sM 1.2 is managed by the Ministry of Agriculture and Rural Development through the Rural Development Directorate-Managing Authority for the NRDP and the Agency for Rural Investment Financing, and follows the European and national legislative provisions on the conduct of public procurement procedures.

In the first phase, a portfolio of procurement processes is planned, starting with identifying and evaluating the needs of the beneficiaries, continuing with the establishment of approaches to the implementation of public procurement processes and finalizing with the approval of the Annual Public Procurement Strategy. At the planning and preparation stage of the public procurement procedures, the Annual Public Procurement Program shall be drawn up at the level of which is determined the need for projects that the Contracting Authority intends to award from the funds of measure 2 during a budget year.

Prior to the launch of the procurement procedure, the Contracting Authority may, where appropriate, conduct a market consultation process by publishing a specific notice in SEAP (Electronic Public Procurement System). The process of organizing the procedure and awarding the contract / framework agreement begins with the submission of the award documentation in the SEAP and finalizes with the entry into force of the public procurement / framework agreement.

Monitoring of the performance of the contract attributed within the sM 1.2 is achieved both by verifying, approving and approving the Implementation Reports by the DGDR MA NRDP, as well as by field verifications carried out by the CDRC.

From the analysis of the conclusions highlighted during the field research activities (questionnaires, interviews, focus groups, etc.) carried out by the evaluators, it is clear that the specific procedural flow sM 1.2, although not presenting elements of overregulation compared to the national and European legislation, of administrative difficulties at the level of the authorities involved, the selection procedures for providers of counseling services being longer than those of other sub-measures where call for proposals is used.



### ***Additional identified requirements (not derived from the European and national rules) and potential effects***

No additional requirements have been identified that are not derived from European and national standards.

### ***Actions to reduce administrative burdens***

No simplification measures have been envisaged at the level of SM 1.2, this being implemented through the implementation of some public procurement procedures, based on the Law no. 98/2016 and Government Decision no. 365/2016 for the approval of the Methodological Norms for the application of the provisions regarding the award of the public procurement contract / framework agreement of Law no. 98/2016 on public procurement. Implementation of the sub-measure using calls for proposals will only be possible subject to the amendment of the provisions of Regulation (EU) No. 1305/2013.

### ***Actions carried out in other Member States/ regions to reduce administrative burdens***

In Ireland, in order to increase the effectiveness of sub-measure 2.1, the Managing Authority (DAFM) identifies areas where there is a specific knowledge gap and calls for project proposals for interested and qualified providers to provide specific training.

In Veneto, the use of IT applications dedicated to collecting data on participants in these activities is foreseen to facilitate verification during training activities, thus ensuring improvement and speeding up of preliminary investigations, reducing errors and monitoring the progress of funded operations.

In both cases, expenditure shall be reimbursed on the basis of standard unit cost in accordance with Article 67 of Regulation (EU) No. 1303/2013.

### ***Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)***

SM 1.2 is in a relatively early stage of implementation, by the end of June 2018, two contracts have been awarded under the "Farmer-to-Small Farmer Counseling" procedures, Lot 1 - the North East and South East (Counties of Bacău, Botosani, Iasi, Neamt, Suceava, Vaslui, Braila, Galati, Tulcea, Constanta, Vrancea and Buzau), with a total value of 1,339,100 lei without VAT and "Counseling to farmers operating in small farms", Lot 7 - the territory of Romania, with a total value of 894,250.00 lei without VAT.

### ***Analysis of selection criteria***

The selection process of the advisory service providers is carried out by the Ministry of Agriculture and Rural Development through the DGRD MA NRDP and is subject to the provisions of the national legislation on public procurement. In the selection of advisory services providers, the Contracting Authority may apply only qualification and selection criteria relating to:

a) reasons for excluding the candidate / tenderer and

b) the capacity of the candidate / tenderer (e.g. the capacity to exercise professional activity, the economic and financial situation, the technical and professional capacity).

### Proposals to reduce administrative burdens

According to the above, sM 2.1 does not present additional requirements compared to the European and national legislation in force, from which it can be concluded that there are no elements of overregulation at the level of the beneficiaries or authorities responsible for the management of the sub-measure. However, the implementation of the sub-measure using calls for proposals could lead to an increase in the number of beneficiaries and increased access, but also to a better coordination and synchronization with the other NRDP measures.

### sM 3.1 Support for first first-time participation in quality schemes

#### Overview of the sub-measure

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Supporting farmers and groups of farmers applying for the first time to quality schemes in order to increase the number of applicants producing and marketing agricultural and food products based on quality schemes.</li> <li>Better integration of agricultural producers in agri-food chains through quality schemes and by adding value to agricultural products.</li> </ul>
<b>Eligible Beneficiaries</b>	<ul style="list-style-type: none"> <li>Farmers, except for unauthorized individuals;</li> <li>Groups of legally established farmers who carry out their agricultural activity on Romanian territory and participate for the first time in an EU quality scheme.</li> </ul>
<b>Eligible Activities</b>	<ul style="list-style-type: none"> <li>Operations / actions eligible for support are quality schemes and optional quality mentions established based on European legislation:             <ul style="list-style-type: none"> <li>Protected Origin Designation (POD);</li> <li>Protected Geographical Indication (PGI);</li> <li>Traditional Specialty Guaranteed (TSG);</li> <li>Controlled Designation of Origin (CDO), for quality wines;</li> <li>Geographical Indication (GI), for quality wines;</li> <li>The optional "mountain product";</li> <li>Organic products;</li> <li>Spirit drinks with Geographical Indication.</li> </ul> </li> </ul>
<b>Procedural Flow</b>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>To apply for online funding requests, applicants who do not have an account at <a href="http://www.afir.info">www.afir.info</a> will have to create a user account within this portal. Users</li> </ul>

	<p>who already have a created account can use it to upload applications in electronic format</p> <ul style="list-style-type: none"><li>• Online submission of the Financing Application Form and the related annexes;</li></ul> <p>Selection stage:</p> <ul style="list-style-type: none"><li>• Financing application according to prescoring: financing application is admitted to verify eligibility and selection criteria if the applicant's score (score) is greater than or equal to the qualitative threshold of the month in which he submitted the Application financing;</li><li>• Checking the eligibility of the financing application: checking the technical and financial eligibility consists of: checking the eligibility of the applicant; checking the eligibility criteria; verification of the project and all attached documents.</li><li>• Verification of selection criteria: Following these checks, there may be three situations: the project is ineligible; the project is eligible and will score <math>\geq</math> the monthly quality threshold; the project is inconsistent.</li><li>• The selection of eligible projects is done in descending order of the selection score. A Selection Report will be published and applicants may file online complaints to be resolved by AFRI.</li></ul> <p>Contracting Stage:</p> <ul style="list-style-type: none"><li>• Submitting the necessary documents for the conclusion of the Grant Contract;</li><li>• Signing the financing contract.</li></ul> <p>Implementation stage:</p> <ul style="list-style-type: none"><li>• Filing of the payment dossier: the application for the first payment of the annual incentive and the supporting documents can be submitted after the date of signing the AFRI Financing Contract. An incentive will be required annually for a maximum of 5 consecutive years from adhering to a quality scheme.</li></ul> <p>Monitoring stage:</p> <ul style="list-style-type: none"><li>• Verification of fulfillment of the conditions assumed by the beneficiary.</li></ul>
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### ***Analysis of the implementation flow of the sub-measure***

Sub-measure 3.1 is a new sub-measure, at the level of which it was carried out, until the time of the present study (January 2019), only the stage of submission of the projects, not yet contracting, implementation and payment.

The application procedure for quality schemes is carried out by active farmers participating for the first time in: EU quality schemes, notified quality schemes, voluntary quality schemes recognized by Member States. The applicant must comply with all applicable requirements for the scheme for which he applies. The scheme applied by the farmer or group of farmers must be certified in accordance with the specific legislation in force. For payment, a maximum of 90 days are allowed from the date of filing of the Payment Requests File at COFRI.



From the point of view of the implementation flow of the sub-measure, it is transparent and very clear in detail at the level of the Applicant's Guide, but the main aspect for the submission of the grant applications consisted in the adherence of beneficiaries to a certified scheme. As a new sub-measure introduced in the program, it did not go through all stages of the implementation flow. The Call for Proposals on sM 3.1 is open and it was launched at the request of the sector, of the farmers in the working groups.

The institutions responsible for ensuring the procedural flow are the Managing Authority of the NRDP and the Agency for Financing Rural Investment.

**Additional identified requirements (not derived from European and national rules) and potential effects**

<i>Additional requirement</i>	<i>The intensity of the requirement on the applicant</i>	<i>The intensity of the requirement on the authorities responsible for implementing the sub-measure</i>	<i>Degree of complexity of the requirement</i>
National schemes are not notified and it is very difficult for farmers to apply for European schemes, in the absence of a clear framework for notification of national quality schemes.	Additional steps to be taken by farmers for registration under quality schemes, where there is no clear and easy framework for national quality schemes.	N.A.	

**Actions to reduce administrative burdens**

Considering the state of implementation of this sub-measure, no simplification actions have been implemented so far to reduce administrative burdens.

However, based on the relatively low level of access to this measure, steps have been taken to notify and create a new national scheme for interested farmers to apply, but a new session should be launched to allow for the application under the new scheme. The requirement for notification of national schemes is carried out in accordance with the documents submitted to the Rural Development Committee.



### **Actions carried out in other Member States/regions to reduce administrative burdens**

A selection criteria in Aragon region is provided to avoid the possibility of awarding a grant to a beneficiary already registered in the quality scheme, the record being checked and controlled in the official quality schemes registries to identify farmers already registered in these registers.

At the same time, in order to avoid double funding with measure 11 (organic farming), measure 11 does not include the cost of registration in the quality scheme, the annual fee and the costs of controls that organic farmers have to pay.

### **Analiza situației proiectelor contractate la sfârșitul lunii iunie 2018 (în ce măsură simplificările prevăzute în PNDR au favorizat implementarea programului)**

Until the end of June 2018, there were no projects submitted under sub-measure 3.1. Between the 2nd of August and 31st December 2018, the first call for funding applications for Sub-measure 3.1 was launched.

### **Analysis of selection criteria**

At the level of sub-measure 3.1, 3 principles and selection criteria were established, the score given at each sub-criterion being different depending on certain predefined subscriptions. The selection criteria are outlined below.

<b>Selection Criteria</b>	<b>Punctaj maxim acordat</b>
SC 1 Principle of quality scheme type in the sense of prioritizing European quality schemes	- Maximum 45 points
SC 2 The principle of associating farmers and farmer groups within producer groups	- Maximum 20 points
SC 3 The principle of the product category obtained through the quality schemes (meat, milk, vegetables, fruits)	- Maximum 35 points

For the project submission session, open until the end of 2018, 3 selection principles were applied, the highest weight (45% of the total score) being granted to the quality scheme type principle, and the maximum score being met if the product obtained is produced under the organic quality scheme. At the time of drafting this evaluation study, an analysis of the effectiveness and relevance of the selection criteria cannot be carried out as no project sessions have been completed in sub-measure 3.1.

### Proposals to reduce administrative burdens

Stage	Proposals to reduce administrative burdens	Expected effects
<b>Application</b>	Notification and creation of a new national scheme under which interested farmers can apply.	At the level of beneficiaries, implementing such a measure could have an impact on the accessibility of the sub-measure.
<b>Selection</b>	Considering that sub-measure 3.1 has not yet completed the selection, implementation and monitoring phases and that there are no beneficiaries of the sub-measure, no measures can be proposed at this time to reduce the administrative burden for these stages.	
<b>Implementation</b>		
<b>Monitoring</b>		

### sM 4.1 Support for investments in agricultural holdings

#### Overview of the sub-measure

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Improving the general performance of agricultural holdings by increasing the competitiveness of agricultural activity, diversifying agricultural activities and increasing the quality of the products obtained;</li> <li>Restructuring of small and medium sized farms and their transformation into commercial farms;</li> <li>Compliance with Community standards applicable to all types of investment;</li> <li>Increasing the added value of agricultural products by processing products at farm level and direct marketing of them to create and promote integrated food chains.</li> </ul>
<b>Eligible Beneficiaries</b>	<ul style="list-style-type: none"> <li>Farmers, except for unauthorized individuals;</li> <li>Cooperatives (agricultural cooperatives and agricultural cooperative societies), producer groups established under the national legislation in force serving the interests of members.</li> </ul>
<b>Eligible Activities</b>	<ul style="list-style-type: none"> <li>Investments in the establishment, expansion and / or modernization of zootechnical farms;</li> <li>Investments in the establishment, extension and / or modernization of the vegetable farms;</li> <li>Investments in setting up / replacing plantations for table grapes and other perennial crops;</li> <li>Investments to meet community standards for young farmers;</li> <li>Establishment and / or upgrading of farm access ways including utilities and connections;</li> </ul>

	<ul style="list-style-type: none"> <li>• Investments in farm processing at farm level as well as investments for marketing;</li> <li>• Investments in the setting up and / or upgrading of farm irrigation facilities, including farm water storage facilities;</li> <li>• Investments in the production and use of energy from renewable sources, with the exception of biomass;</li> <li>• Investments in installations for the production of electricity and / or heat by using biomass (from waste / by-products resulting from agricultural and / or forestry activity on both the farm and the farm);</li> <li>• Intangible investments: the acquisition or development of software and the acquisition of patents, licenses, copyrights, trademarks in accordance with Article 45 (2) (d) of Reg. 1305/2013.</li> </ul>
<p><b>Procedural Flow</b></p>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>• Online submission of the Application Form and its related technical and administrative annexes (prior registration of applicants on the AFRI website).</li> </ul> <p>Selection stage:</p> <ul style="list-style-type: none"> <li>• Administrative verification of the application file by COFRI / RCRIF;</li> <li>• Applying funding requests according to pre-scoring;</li> <li>• Checking the eligibility of funding applications;</li> <li>• Field verification of funding applications by COFRI / RCRIF;</li> <li>• Check eligibility and selection criteria;</li> <li>• Selection of eligible projects, in descending order of the selection score, and publication of the Selection Report, which allows applicants to file online complaints to be solved by AFRI.</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>• Submission of the necessary documents for the conclusion of the Financing Contract by the selected beneficiaries at the COFRI / RCRIF headquarters;</li> <li>• Preparing and signing the financing contract.</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>• Preparation and submission of the payment application file by the beneficiary;</li> <li>• Checking and authorizing the payment request by AFRI.</li> </ul>

### Analysis of the implementation flow of the sub-measure

sM 4.1 is implemented through the Agency for Rural Investment Financing and its territorial structures - Regional Centers and County Offices. There are also protocols concluded with several institutions such as NSVFS and the Ministry of the Environment, National Cadastre Office, in order to obtain direct information on the applicants' situations. Another feature is the Integrated Administration and Control System of Romania (IACS), which examines, for example, agricultural land owned by beneficiaries and farm registrations.

The procedural flow of the projects financed under this sub-measure is summarized in the table above. An important point to be made is that the application file can only be submitted online at [www.afir.info](http://www.afir.info), with

applicants having to create a user account within this portal. It also encourages the electronic signing of documents.

The verification of the applications for funding and the on-the-spot verification is carried out by the COFRI for non-construction financing applications and by the RCRIF for the applications for construction finance.

**Additional identified requirements (not derived from European and national rules) and potential effects**

<i>Additional requirement</i>	<i>Intensity of the requirement on the Applicant</i>	<i>Intensity of the requirement on authorities responsible for managing and implementing of the sM</i>	<i>Degree of complexity of the requirement</i>
Requesting many supporting documents at the time of application, many of which are public or can be obtained by institutional means (balance sheets, tax returns – in this case APIA declarations were developed).	Additional administrative burden for applicants, as these documents could be requested directly from the competent institutions.	N.A.	

**Other reported issues that generate administrative burdens:**

- Legislative changes that impose new criteria to be respected during the commitment period and were not in force at the date of signing the contract.

**Actions to reduce administrative burdens**

În actuala perioadă de programare au fost întreprinse o serie de măsuri de simplificare comparativ cu perioada trecută de programare sau de la o sesiune de depunere a proiectelor la alta.

Astfel, principalele acțiuni realizate pentru reducerea poverii administrative la nivelul beneficiarilor și al autorităților implicate în implementarea PNDR 2014-2020 sunt:

- Decreasing the moment of submission of a series of supporting documents from the application stage to the contracting stage (environmental opinion, opinions from NSVFSA);
- Extending the 90-day period of submission of the notifications, provided evidence is provided that the steps taken to obtain the opinions. This simplification measure was adopted to avoid declaring projects with high impact on the development of rural areas ineligible;
- Online submission via the SPCDR computer system;



- The possibility of reducing the economic size of the agricultural holding envisaged for the submission of the Financing Application for the duration of the contract execution (as defined in the Financing Agreement), allowing a margin of maximum 15% for the fluctuation of the economic dimension without lowering the size of the holding below the set minimum threshold through the eligibility condition;
- Using the Expanded Reference Pricing Database to assess the reasonableness of costs (the applicant no longer has to bid if the goods are found in the Base);
- Obtaining the land book extract by the Agency instead of the applicant;
- Notification of the beneficiary 6 months before the last payment installment was submitted in order to identify possible problems leading to termination of the contracts and granting the Agency support within the limits of the law in order to solve the problems;
- Steps taken to conclude a protocol with NAFA.

**Actions carried out in other Member States/Regions to reduce administrative burdens**

In Tuscany, in order to reduce the number of documents, the application form only contains the elements needed to prepare the ranking and to determine the contribution to the necessary investments. It also contains elements regarding the fulfillment of the eligibility criteria. In any case, identifying applications with funding potential does not constitute a funding entitlement for the applicant.

Funding applications are selected from a list based on the results of the selection criteria declared by the applicants. It is very important that the document approving the ranking list includes the list of applicants graded according to the scores from the selection criteria and indicates the projects that can be funded on the basis of the allocated resources, those that can not be financed from the lack of resources and the projects which can not be accepted.

The beneficiary acquires the right to be funded only after the outcome of the evaluation of the application for funding by the competent offices is positive.

**Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)**

By the end of June 2018, of the 1443 (including ITI projects) contracted projects, only 16 were terminated (8 in the vegetal sector and 8 in the livestock sector), which highlights the fact that there are no significant problems encountered in the implementation of the projects .

No. contracted projects	No. completed projects	No. terminated projects
1443	712	16



### Analysis of selection criteria

At the level of sub-measure 4.1, 8 selection criteria were established, the score given at each sub-criteria being different depending on the sector concerned - vegetal or zootechnical.

The eight selection criteria are outlined below. It is noted that since the launch of the first call for proposals until now, the score of the selection criteria has been modified from the maximum score that can be obtained by the applicant.

Thus, higher priority is now given to projects targeting investments in priority sectors and greater encouragement is given to associating farmers with small holdings.

Selection criteria – the vegetable sector	Maximum score awarded
SC 1 The farm size principle targeting medium-sized holdings	<ul style="list-style-type: none"> <li>- Maximum 15 points (session 2015)</li> <li>- Maximum 7 points (sesiunea 2018)</li> </ul>
SC 2 The principle of the priority sector according to the socio-economic analysis such as the zootechnical sector (swine, bovine and poultry) and vegetal (cereals, oil and protein crops, potatoes and vegetable growing in protected areas, including the production of propagating material)	<ul style="list-style-type: none"> <li>- Maximum 15 points (session 2015)</li> <li>- Maximum 25 points (session 2018)</li> </ul>
SC 3 The principle of integrated food chains, ie the combination within the same project of the investments in the primary agricultural production with the processing and / or marketing of the obtained production	<ul style="list-style-type: none"> <li>- Maximum 20 points (session 2015)</li> <li>- Maximum 11 points (session 2018)</li> </ul>
SC 4 The principle of associating farmers with small and / or medium-sized holdings within cooperatives or producer groups	<ul style="list-style-type: none"> <li>- Maximum 20 points (session 2015)</li> <li>- Maximum 27 points (session 2018)</li> </ul>
SC 5 The principle of the agricultural potential of the area targeting the areas with potential determined based on the specialty studies	<ul style="list-style-type: none"> <li>- Maximum 10 points (session 2015)</li> <li>- Maximum 10 points (session 2018)</li> </ul>
SC 6 The principle of agricultural farmer qualification level in the agricultural holding manager	<ul style="list-style-type: none"> <li>- Maximum 10 points (session 2015)</li> <li>- Maximum 11 points (session 2018)</li> </ul>
SC 7 Water economy principle for projects that provide investments to modernize farm-level irrigation systems by prioritizing investments leading to the largest water savings	<ul style="list-style-type: none"> <li>- Maximum 5 points (session 2015)</li> <li>- Maximum 5 points (session 2018)</li> </ul>
SC 8 The principle of native varieties	<ul style="list-style-type: none"> <li>- Maximum 5 points (session 2015)</li> <li>- Maximum 4 points (session 2018)</li> </ul>



Selection criteria - livestock sector	Relevance towards achieving the objectives of the strategy
SC 1 Size principle of the holding targeting medium-sized holdings	- Maximum 15 points (session 2015) - Maximum 17 points (session 2018)
SC 2 The principle of the priority sector according to the socio-economic analysis such as the zootechnical sector (swine, bovine and poultry) and vegetal (cereals, oil and protein crops, potatoes and vegetable growing in protected areas, including the production of propagating material)	- Maximum 15 points (session 2015) - Maximum 35 points (session 2018)
SC 3 The principle of integrated food chains, ie the combination within the same project of the investments in the primary agricultural production with the processing and / or marketing of the obtained production	- Maximum 20 points (session 2015) - Maximum 6 points (session 2018)
SC 4 The principle of associating farmers with small and / or medium-sized holdings within cooperatives or producer groups	- Maximum 20 points (session 2015) - Maximum 25 points (session 2018)
SC 5 The principle of the agricultural potential of the area targeting the areas with potential determined based on the specialty studies	- Maximum 10 points (session 2015) - Maximum 9 points (session 2018)
SC 6 The principle of agricultural farmer qualification level in the agricultural holding manager	- Maximum 10 points (session 2015) - Maximum 10 points (session 2018)
SC 7 The water economy principle for projects providing investments to modernize farm-level irrigation systems by prioritizing investments that lead to the largest water savings (0 points)	- 0 points (session 2015) - 0 points (session 2018)
SC 8 The principle of native varieties (maximum 4 points)	- Maximum 10 points (session 2015) - Maximum 4 points (session 2018)

In general, no specific problems have been identified regarding the application and compliance with the selection criteria on this sub-measure, which are considered relevant from the perspective of project hierarchy with an effective contribution to the achievement of the strategy's objectives.

Regarding the eligibility criteria, the most common reason why applications for non-fulfillment of eligibility criteria were rejected was largely related to the forms of ownership of the holding (ownership, superficies, real rights and real rights) accessories, where appropriate), especially in cases where there were problems with registration in the land register (cadaster).

**Proposals to reduce administrative burdens**

Stage	Proposals to reduce administrative burdens	Expected effects
<b>Application</b>	Concluding several protocols with institutions empowered to provide information on applicants, such as the Romanian Police (for obtaining the criminal record), so as to reduce the number of documents filed with the application for funding.	Reducing the number of documents requested to the applicants.
<b>Selection</b>	N.A.	
<b>Implementation</b>	N.A.	
<b>Monitoring</b>	Request a smaller number of documents in the reporting process by eliminating documents that are public.	Reducing the number of documents requested from the beneficiaries

**sM 4.1a Support for investments in fruit growing holdings**

**Overview of the sub-measure**

<b>Objective</b>	<ul style="list-style-type: none"> <li>increasing the competitiveness, diversifying the production, increasing the quality of the products obtained and improving the overall performance of the fruit growing holdings;</li> <li>increasing the added value of the products by on-farm processing of the fruits and direct marketing of the products obtained;</li> <li>development of the short supply chains;</li> <li>streamlining the production costs by promoting the production and use of energy from renewable sources within the farm and by reducing energy consumption.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>Farmers, except non-authorized natural persons;</li> <li>Cooperatives and producer groups operating in the fruit sector, provided that the investments made serve the members' interests.</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>Investments in setting up and modernization of fruit-growing farms, including the setting up and conversion of fruit plantations and the modernization of the agricultural machinery and equipment park;</li> <li>Investments in setting up and upgrading of the fruit nurseries, including the increase of the areas occupied by plating material;</li> <li>Establishment and upgrading of farm processing units and investment for marketing (such as farm gateways or caravans through which only their own</li> </ul>

	<p>agricultural products will be marketed), only as a secondary component of the project;</p> <ul style="list-style-type: none"> <li>• Investments in the production and use of energy from renewable sources except biomass (solar, wind, heat produced by pumps, geothermal energy) within the farm as a secondary component in a grant-supported investment project, and the energy obtained will be exclusively for own consumption;</li> <li>• Investments in installations to produce electricity and / or heat by using biomass (from waste /secondary products from agricultural and / or forestry activities, both from the farm and outside the farm) as a secondary component within a grand-supported investment project, and the energy obtained will be exclusively for own consumption;</li> <li>• Establishment and / or upgrading of farm access ways, including utilities and connections;</li> <li>• Investments to meet Community standards for young farmers in accordance with Article 17 (5) of Reg. 1305/2013 where support can be granted for a maximum period of 24 months from the time of installation;</li> <li>• Intangible investments: the acquisition or development of software and the acquisition of patents, licenses, copyrights, trademarks in accordance with Article 45 (2) (d) of Reg. 1305/2013, with subsequent amendments.</li> </ul>
<p><b>Procedural flow</b></p>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>• Online submission of the Application Form and its related technical and administrative annexes (prior registration of applicants on the AFRI website).</li> </ul> <p>Selection stage:</p> <ul style="list-style-type: none"> <li>• Administrative verification of the application file by COFRI / RCFRI;</li> <li>• The classification of applications for pre-scoring;</li> <li>• Checking the eligibility of funding applications;</li> <li>• On-the-spot verification of funding requests by COFRI/ RCFRI;</li> <li>• Verification of eligibility and selection criteria;</li> <li>• Selection of eligible projects, in descending order of the selection score, and publication of the Selection Report, after which applicants can file online complaints, which will be solved by AFRI.</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>• Filing the necessary documents for the signing of the Financing Contract by the selected beneficiaries at the COFRI / RCFRI headquarters;</li> <li>• Preparing and signing the financing contract.</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>• Preparing and submitting the payment application file by the beneficiary;</li> <li>• Checking and authorizing the payment request by AFRI.</li> </ul>



### ***Analysis of the implementation flow of the sub-measure***

The sub-measure 4.1 was introduced within the National Rural Development Programme during the current programming period. As a new measure, it has gone through several simplification/updating processes, following consultations with beneficiaries, specialized institutes and other stakeholders. Thus, the relationships between the involved bodies and the beneficiaries/potential beneficiaries have facilitated access to support through this sub-measure, by modifying the requirements that have proved more difficult to accomplish, such as country-wide soil varieties certification and proof of cadastre.

Other efforts made to facilitate the implementation of this sub-measure concerned the activities undertaken for beneficiaries to understand the use of standard costs, which in the case of this sub-measure are mainly used for the planting material. Also, based on several analyzes conducted by several research institutes, the value for TAUs favorability score where holdings can be located was reduced. In addition, if the applicant considers that the favorability score he / she obtains is higher than the score obtained by the TAU where he / she is located, he / she has the option of calculating his / her own favorability score on the basis of an individual study, following the same calculation methodology as applied in the annex with the zoning.

The procedural flow for implementing the projects financed under this sub-measure is summarized in the table above. An important aspect is that the application file can only be submitted online at [www.afir.info](http://www.afir.info), where the applicants must create a user account.

The verification of the application forms and the on-the-spot verification is carried out by COFRI for the funding applications without constructions and installation and by the RCRIF, for the applications with constructions and installation and / or establishment of fruit plantations.

### ***Additional requirements (not covered by the European and national legislation) and potential effects***

No additional requirements that are not derived from European and national rules have been identified. Also, no requirements that can cause difficulties for beneficiaries and authorities have been identified.

### ***Actions implemented to reduce administrative burden***

Following the consultation of the beneficiaries and other relevant key stakeholders and parties interested, changes were made in the implementation of sub-measure 4.1.a, the main simplification actions undertaken being:

- Modification of the applicants' obligation to come with certified soil varieties, tested genetically at country level, by allowing varieties to be tested also outside the country, not only at national level. The change occurred as a result of the requests from the beneficiaries and as a result of the analysis of the first submitted projects, when it was found that this requirement greatly restricts the varieties;



- For two of the target species (walnut and hazelnut), it was very difficult to find certified material both at national and international level, which is why for these species an exception was made, allowing the identification of an inferior material type (also because these species have a higher degree of vulnerability to pests);
- As the beneficiaries had difficulties in proving the land registration (problem identified at national level), the MA simplified the procedure asking the beneficiaries to prove the provisional classification of the land (parcel plan) at the time of the submission of the projects and to confirm the classification by providing the land registration until the moment of signing the contract;
- Online submission through the IT system SPCDR;
- The possibility of reducing the economic size of the agricultural holding envisaged at the moment of submitting the Application form for the duration of the contract (as defined in the Financing Contract) allowing a margin of maximum 15% for the fluctuation of the economic dimension without reducing the size of the holding below the minimum threshold established by the eligibility condition;
- Introduction of the standard unitary cost;
- Introduction of two new species: goji and mulberry;
- Using the expanded version of the Reference Pricing Database to assess the reasonableness of costs (the applicant no longer has to provide pricing offers if the goods are found in the database)
- Obtaining the land book by the Agency instead of the applicant;
- Notification of the beneficiary with 6 months before the submission of last payment installment in order to identify possible problems leading to the termination of the contracts and granting the Agency the support within the legislative limits in order to solve the problems;
- Steps taken to finalize a collaboration protocol with NAFA.

#### ***Actions carried out in other member states/regions to reduce administrative burden***

In the case of this submeasure, through the benchmark analysis, no specific simplification actions were identified, different than those of SM 4.1.a.

#### ***Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)***

By the end of June 2018, out of the 196 contracted projects, only 4 were canceled, pointing out that there were no significant problems encountered in the implementation of the projects. On the other hand, the number of finalized projects is also small - only 3.

No. of contracted projects	No. of finalized projects	No. of cancelled projects
196	3	4

### Analysis of selection criteria

At the level of sub-measure 4.1a, 10 selection criteria were set out and are presented below:

Selection criteria	Maximum score
SC 1 The principle of the priority fruit tree species (peach, nectarine, apple, shrubs, apricot, cherry)	- Maximum 10 points
SC 2 Size principle (small farms)	- Maximum 5 points
SC 3 The principle of the priority crop system (intensive, super-intensive, ecological, crops in protected areas)	Maximum 15 points
SC 4 The principle of integrated food chains (investments covering the food chain: production - conditioning - storage - processing - marketing)	- Maximum 15 points
SC 5 The principle of association (investments made by producer groups, their members and cooperatives from the fruit sector)	- Maximum 15 points
SC 6 The principle of ownership (agricultural holdings owning the fruit plantations subject to conversion and / or the land on which the establishment of the fruit plantations is made)	- Maximum 10 points
SC 7 Qualification level principle (higher education in the project area, medium studies in the project area)	- Maximum 10 points
SC 8 Age principle (young people up to and including 40 years)	- Maximum 5 points
SC 9 Reconversion principle (investments requiring reconversion)	- Maximum 10 points
SC 10 The principle of water saving for projects that envisage investments to modernize farm-level irrigation systems by prioritizing investments targeting higher water savings.	- Maximum 5 points

No specific problems have been identified regarding the application and compliance with the selection criteria on this sub-measure, the selection criteria being considered relevant to prioritize the projects with an effective contribution to the achievement of the objectives of the strategy.

**Proposal to reduce the administrative burdens**

Stage	Proposals to reduce the administrative burdens	Expected effects
<b>Application</b>	Concluding several protocols with institutions empowered to provide information regarding the applicants, such as the Romanian Police (for obtaining the criminal record).	Reducing the number of documents requested to the applicants and, implicitly, the time for the preparation of the projects.
<b>Selection</b>	N.A.	
<b>Implementation</b>	N.A.	
<b>Monitoring</b>	N.A.	

**sM 4.2 Support for investments in the processing / marketing of agricultural products**

**Overview of the submeasure**

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• Set-up and/or modernization of processing and marketing units;</li> <li>• Introduction of new technologies for the development of new products and processes;</li> <li>• Application of environmental protection actions, including lower energy consumption and GHG emissions;</li> <li>• Promotion of investments for the production and use of energy from renewable sources;</li> <li>• Increase of number of permanent jobs.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>• Enterprises, cooperatives and producer groups defined according to the national legislation in force</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>• Establishment, extension and / or modernization and endowment of processing units, including investments in product marketing (eg labeling, packaging);</li> <li>• Establishment, extension and / or modernization of local network for collection, reception, storage, conditioning, sorting and packing capacities;</li> <li>• Improvement of internal quality control and compliance with the new standards required by European legislation for the processing and marketing of agro-food products;</li> <li>• Production and use of energy from renewable sources (solar, wind, geothermal), of the energy produced by heat pumps, within the processing units for own consumption and investments to improve energy efficiency (as operations within a larger investment project supported by grant);</li> <li>• Investments in intangible assets for: organization and implementation of quality management and food safety systems, if they are related to the project's</li> </ul>

	tangible investment; the acquisition of know-how, patents and licenses to prepare the project implementation; the purchase of software identified as necessary in the technical and economic documentation of the project.
<b>Procedural flow</b>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>Online submission of the Application Form and its related technical and administrative annexes (prior registration of applicants on the AFRI website).</li> </ul> <p>Selection stage:</p> <ul style="list-style-type: none"> <li>Administrative check of the application dossier by COFRI / RCFRI;</li> <li>Selection of application forms based on pre-scoring;</li> <li>Checking the eligibility of application forms;</li> <li>On field verification of application forms, by COFRI / RCFRI;</li> <li>Checking the eligibility and selection criteria;</li> <li>Selection of eligible projects in descending order of the selection score and publication of the Selection Report, as a result of which applicants can submit the online complaints, which will be solved by AFRI.</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>Submitting the necessary documents for the conclusion of the Financing Contract by the selected beneficiaries, at the COFRI / RCFRI headquarters;</li> <li>Preparation and signing of the financing contract.</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>Preparation and submission of the payment request by the beneficiary;</li> <li>Verification and authorization of the payment request by AFRI.</li> </ul>

### **Analysis of the implementation flow**

The sM 4.2 is implemented through the Agency for Financing Rural Investment and its territorial structures - Regional Centers and County Offices. There are also protocols concluded with a number of institutions such as NSVFSAs and the Ministry of Environment, in order to obtain direct information on the applicants' situations.

The procedural flow for implementing the projects financed under this submeasure is summarized in the table above. An important aspect is that the application dossier can only be submitted online at [www.afir.info](http://www.afir.info), where the applicants have to create a user account. It is also encouraged the electronic signing of the documents.

The verification of the application forms and the on-the-spot verification is carried out by COFRI for the applications without constructions and installation and by the RCFRI, for the applications with constructions and installations.

Sub-measure 4.2 is part of the Programme's high performance measures, which is highly attractive to beneficiaries and whose implementation conditions are easily understood by the beneficiaries. However,



some legislative changes can have a significant impact on the beneficiaries of this submeasure. An example can be the introduction of Order no. 119/2014 of the Ministry of Health for the approval of Hygiene and public health norms on the living environment of the population, which establishes minimum sanitary protection distances between the protected territories and the units that cause discomfort and health risks to the population - compliance with the imposed provisions created difficulties in implementing the projects.

### ***Additional requirements (not derived from the European and national legislation) and potential effects***

No additional requirements that are not derived from European and national rules have been identified. Also, no requirements that can cause particular difficulties for beneficiaries and authorities have been identified.

### ***Actions implemented to reduce administrative burden***

The main simplification actions undertaken with regard to submeasure 4.2 were:

- Simplification of the documentation at the time of submitting the application form, through the protocols concluded with public institutions, so that the applicant did not have to submit some of the documents;
- Reduce the co-financing rate for associative forms, starting with the submission session in 2018, following the amendment of the Regulation;
- Using the expanded version of the Reference Pricing Database to assess the reasonableness of costs (the applicant no longer has to provide pricing offers if the goods are found in the database)
- Obtaining the land book by the Agency instead of the applicant;
- Notification of the beneficiary with 6 months before the submission of last payment installment in order to identify possible problems leading to the termination of the contracts and granting the Agency the support within the legislative limits in order to solve the problems;
- Steps taken to finalize a collaboration protocol with NAFA.

### ***Actions carried out in other member states / regions to reduce administrative burdens***

In Aragona, the reduction of the risks related to measure implementation is mainly done through the control carried out at the start of investments. It is considered a priority to analyze the technical and economic evaluation of the grant application in order to grant only those applications that are considered viable.

To mitigate and eliminate potential risks, the following actions are taken:

- Performing desk (administrative) and field checks;
- Clear and consistent thresholds for prioritization of applications are set with respect to the selection criteria, so that the evaluation committee has weighted criteria for obtaining the appropriate score, establishing their inclusion in the areas of intervention / priority;



- The staff in charge of managing financial support receives instructions for processing the requests received on the helpdesk telephone line, the procedure manual setting out the guidelines to be followed in each of the application phases.

In Tuscany, in order to avoid duplication of payments and to simplify all procedures, the following were introduced:

- a unique IT system for submission of the grant application, managing and monitoring applications for funding and payments for various Union funds;
- a guide that facilitates the identification of eligible costs and links to certified databases for verification and cross-check of access or access, selection and contribution requirements;
- using documents for allocation that summarize the important items of allowed investments, timing of implementation, reporting methods and engagements;
- supervising preliminary phases, performed by subjects other than responsible authorities.

**Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

By the end of June 2018, 154 projects were contracted (including 3 projects on 4.2 ITI and 42 projects on 4.2 GBER), out of which 9 projects were finalized and 4 canceled. The number of cancelled projects is not significant so as to highlight the existence of significant problems in the implementation of the projects.

No. of contracted projects	No. of finalized projects	No. of cancelled projects
154	9	4

**Analysis of eligibility and selection criteria**

At the level of submeasure 4.2, 4 selection criteria were established, the score given for each sub-criterion being presented below.

Selection criteria – vegetal sector	Maximum score
CS 1 The principle of creating integrated food chains, ie the integration of collection, processing and marketing systems	- Maximum 35 points (session 2015) - Maximum 30 points (session 2018)
CS 2 The principle of the product with high added value (eg products participating in quality schemes recognized at national, European level etc.)	- Maximum 30 points (session 2015) - Maximum 25 points (session 2018)
CS 3 The principle of association within cooperatives or producer groups	- Maximum 15 points (session 2015) - Maximum 15 points (session 2018)

Selection criteria – vegetal sector	Maximum score
CS 4 The principle of agricultural potential targeting the areas with potential determined based on the speciality study	<ul style="list-style-type: none"> <li>- Maximum 20 points (session 2015)</li> <li>- Maximum 30 points (session 2018)</li> </ul>

The selection criteria and the way the score was awarded have been modified, revised with each call for proposals, based on the feedback received from potential beneficiaries.

### Proposal to reduce the administrative burdens

Stage	Proposals to reduce the administrative burdens	Expected effects
Application	Concluding several protocols with institutions empowered to provide information regarding the applicants, such as with the Romanian Police (for obtaining the criminal record), so as to reduce the number of documents submitted with the application form	Reducing the number of documents requested to the applicants and, implicitly, the time for the preparation of the projects.
Selection	N.A.	
Implementation	N.A.	
Monitoring	N.A.	

### sM 4.2a Investments in processing/marketing products in the fruit-growing sector

#### Overview of the submeasure

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• modernization and creation of processing and marketing units;</li> <li>• introduction of new technologies for developing new products and technological processes;</li> <li>• increase of the added value of products in the fruit-growing sector;</li> <li>• improvement of internal quality control;</li> <li>• increase in number of permanent jobs;</li> <li>• decrease of energy consumption and GHG emissions.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>• Micro, small, medium and large enterprises defined in accordance with the national legislation in force;</li> <li>• Cooperatives and producer groups carrying out tangible and intangible investments in the processing and marketing of agricultural products listed in</li> </ul>

	Annex I to the Treaty on the Functioning of the European Community (TFEU), with the exception of fishery products.
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>• Investments in tangible assets in the sector of processing the products from the fruit growing sector, for:             <ul style="list-style-type: none"> <li>○ establishment, extension and / or modernization of units processing raw materials from the fruit sector listed in Annex I to the TFEU;</li> <li>○ establishment, extension and / or modernization of local networks for collection, reception, storage, conditioning, sorting and packaging;</li> <li>○ production and use of energy from renewable sources in its own unit;</li> <li>○ marketing actions;</li> </ul> </li> <li>• Investments in intangible assets for:             <ul style="list-style-type: none"> <li>○ organizing and implementing quality management and food safety systems if they are related to the project's tangible investments;</li> <li>○ the acquisition of know-how, patents and licenses to prepare the project implementation;</li> <li>○ the purchase of software identified as necessary in the technical and economic documentation of the project.</li> </ul> </li> </ul>
<b>Procedural flow</b>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>• Online submission of the Application Form and its related technical and administrative annexes (prior registration of applicants on the AFRI website).</li> </ul> <p>Selection stage:</p> <ul style="list-style-type: none"> <li>• Administrative check of the application dossier by COFRI / RCFRI;</li> <li>• Selection of application forms based on pre-scoring;</li> <li>• Checking the eligibility of application forms;</li> <li>• On field verification of application forms, by COFRI / RCFRI;</li> <li>• Checking the eligibility and selection criteria;</li> <li>• Selection of eligible projects in descending order of the selection score and publication of the Selection Report, as a result of which applicants can submit the online complaints, which will be solved by AFRI.</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>• Submitting the necessary documents for the conclusion of the Financing Contract by the selected beneficiaries, at the COFRI / RCFRI headquarters;</li> <li>• Preparation and signing of the financing contract.</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>• Preparation and submission of the payment request by the beneficiary;</li> <li>• Verification and authorization of the payment request by AFRI.</li> </ul>

### Analysis of the implementation flow

The SM 4.2a is implemented through the Agency for Financing Rural Investment and its territorial structures - Regional Centers and County Offices. There are also protocols concluded with a number of institutions such as NSVFSA and the Ministry of Environment, in order to obtain direct information on the applicants' situations.

The procedural flow for implementing the projects financed under this submeasure is summarized in the table above. An important aspect is that the application dossier can only be submitted online at [www.afir.info](http://www.afir.info), where the applicants have to create a user account.

The verification of the application forms and the on-the-spot verification is carried out by COFRI for the applications without constructions and installation and by the RCFRI, for the applications with constructions and installations.

#### **Additional requirements (not covered by the European and national legislation) and potential effects**

No additional requirements that are not derived from European and national rules have been identified. Also, no requirements that can cause particular difficulties for beneficiaries and authorities have been identified.

#### **Actions implemented to reduce administrative burden**

The main simplification action took with regards to submeasure 4.2a was related to the online submission of application forms via the SPCDR IT system.

#### **Actions carried out in other Member States / regions to reduce administrative burdens**

For this sub-measure, the benchmark analysis did not identify specific simplification actions different from those already mentioned for SM. 4.2.

#### **Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

By the end of June 2018, on submeasure 4.2.a were registered 12 contracted projects, none of them being finalized. Out of the 12 contracted projects, 2 were canceled. The causal relationship between the elements of overregulation and the termination of the two contracts cannot be highlighted.

No. of contracted projects	No. of finalized projects	No. of cancelled projects
12	0	2

#### **Analysis of eligibility and selection criteria**

At the level of submeasure 4.2a, 3 selection criteria were established, the score given for each sub-criterion being presented below.

Selection criteria – session 2018	Maximum score
CS 1 The principle of high value added products (coming from HNV areas, national and European quality schemes)	- Maximum 40 points (session 2018)
CS 2 The principle of integrated food chains (investments covering the entire food	- Maximum 40 points (session 2018)

Selection criteria – session 2018	Maximum score
chain: collection, storage, conditioning, processing and marketing)	
CS 3 Association principle (investments made by producer groups and cooperatives from the fruit growing sector).	- Maximum 20 points (session 2018)

No specific problems have been identified regarding the application and compliance with the selection criteria on this sub-measure, the selection criteria being considered relevant to prioritize the projects with an effective contribution to the achievement of the objectives of the strategy.

### Proposal to reduce the administrative burdens

Stage	Proposals to reduce the administrative burdens	Expected effects
Application	Concluding several protocols with institutions empowered to provide information regarding the applicants, such as with the Romanian Police (for obtaining the criminal record), so as to reduce the number of documents submitted with the application form	Reducing the number of documents requested to the applicants and, implicitly, the time for the preparation of the projects.
Selection	N.A.	
Implementation	N.A.	
Monitoring	N.A.	

### sM 4.3 Investments for the development, modernization or adaptation of agricultural and forestry infrastructure

#### Overview of the submeasure

<b>Objectives</b>	<p><b>sM4.3 - IRRIGATIONS:</b></p> <ul style="list-style-type: none"> <li>• Modernization of irrigation infrastructure.</li> </ul> <p><b>sM4.3 - AGRICULTURAL:</b></p> <ul style="list-style-type: none"> <li>• Increase the competitiveness of the agricultural sector by improving the accessibility of agricultural holdings;</li> <li>• Modernizing and adapting the access ways;</li> <li>• Ensure a better supply and easier access to consumers and markets.</li> </ul> <p><b>sM4.3 – FORESTRY:</b></p> <ul style="list-style-type: none"> <li>• Set-up, extension and modernization of accesses to forestry fund.</li> </ul>
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<p><b>Eligible beneficiaries</b></p>	<p><b>sM4.3 - IRRIGATIONS:</b></p> <ul style="list-style-type: none"> <li>Organizations/federations of water users, comprising holders/users of farm lands, according to the legislation in force.</li> </ul> <p><b>sM4.3 - AGRICULTURAL:</b></p> <ul style="list-style-type: none"> <li>Administrative-territorial units and/or their associations, according to the legislation in force.</li> </ul> <p><b>sM4.3 - FORESTRY:</b></p> <ul style="list-style-type: none"> <li>Legal entities of private law / other forms of forest owners organizations and / or their associations, according to the legislation in force;</li> <li>Administrative-territorial units and/or their associations, forest holders.</li> </ul>
<p><b>Eligible activities</b></p>	<p><b>sM4.3 - IRRIGATIONS:</b></p> <ul style="list-style-type: none"> <li>Modernization of secondary irrigation infrastructure, buildings related to pumping / refueling / pressure piping and / or connection to utilities, water metering systems, including the construction / modernization of irrigation water collection and storage basins.</li> </ul> <p><b>sM4.3 - AGRICULTURAL:</b></p> <ul style="list-style-type: none"> <li>Construction, extension and / or modernization of agricultural access roads to farms (access ways outside the agricultural holdings).</li> </ul> <p><b>sM4.3 - FORESTRY:</b></p> <ul style="list-style-type: none"> <li>Construction, extension and / or modernization of forest roads.</li> </ul>
<p><b>Procedural flow</b></p>	<p><b>Application stage:</b></p> <ul style="list-style-type: none"> <li>Online submission of the Application Form and its related technical and administrative annexes (prior registration of applicants on the AFRI website).</li> </ul> <p><b>Selection stage:</b></p> <ul style="list-style-type: none"> <li>Administrative check of the application dossier by COFRI / central AFRI;</li> <li>Selection of application forms based on pre-scoring;</li> <li>Checking the eligibility of application forms;</li> <li>On field verification of application forms, by COFRI / central AFRI;</li> <li>Checking the eligibility and selection criteria;</li> <li>Selection of eligible projects in descending order of the selection score and publication of the Selection Report, as a result of which applicants can submit the online complaints, which will be solved by AFRI.</li> </ul> <p><b>Contracting stage:</b></p> <ul style="list-style-type: none"> <li>Submitting the necessary documents for the conclusion of the Financing Contract by the selected beneficiaries, at the COFRI headquarters;</li> <li>Preparation and signing of the financing contract.</li> </ul> <p><b>Implementation stage:</b></p> <ul style="list-style-type: none"> <li>Verification of the acquisition documents;</li> <li>Preparation and submission of the payment request by the beneficiary;</li> <li>Verification and authorization of the payment request by AFRI.</li> </ul>



### ***Analysis of the implementation flow***

The sM 4.3 is implemented through the Agency for Financing Rural Investment and its territorial structures - Regional Centers for Financing Rural Investment. The submeasure is addressed to public beneficiaries and is divided into three components: irrigation infrastructure, agricultural access infrastructure and forest access infrastructure.

The procedural flow for implementing the projects financed under this submeasure is summarized in the table above. An important aspect is that the application dossier can only be submitted online at [www.afir.info](http://www.afir.info), where the applicants have to create a user account.

The verification of the application forms and the on-the-spot verification is carried out by COFRI and by the central AFRI. Thus, the COFRI verifies the application forms from administrative point of view and conducts on field verifications for all the application forms, while AFRI - central level, makes on field verifications for the projects included in the sample.

The interest in applying under this submeasure is very high. Currently on the agricultural and forestry component there are eligible projects that have not received funding because they have received a lower score. In the case of these projects the areas where projects have been submitted have not allowed a higher score.

The use of the prescoring system is considered useful by AFRI for the qualitative selection of the projects and the classification of the submitted projects. Thus, the submission of projects is done monthly only for the projects with an estimated score (prescoring) higher than or equal to the quality threshold for that month.

However, given the large number of applicants and the provision of the Applicant's Guide according to which the ongoing submission of the projects within a session related to a measure / submeasure, stops before the deadline set in the launch note, when the total public value of the submitted projects with an estimated score higher than or equal to the quality threshold for the respective month reaches 200% of the allocation of the session related to the measure / submeasure (distinct allocation), but not earlier than 5 calendar days in each stage, there were cases where under submeasure 4.3 - agricultural component, the projects were submitted in the amount of 1300% of the allocation, which involved a considerable administrative effort, since all the projects had to be checked in terms of eligibility.

**Additional requirements (not covered by the European and national legislation) and potential effects**

Additional requirement	Intensity of the requirement on the applicant	Intensity of the requirement on the authorities responsible for managing and implementing sM	Degree of complexity of the requirement
An eligibility check of all the application forms submitted during a session, even when the total public value of the submitted projects, which have a score higher than or equal to the quality threshold for that session, exceeds well below the 200% threshold of the allocation / session.	N.A.	Additional administrative effort to check a large number of application forms	
Requesting the notices listed in the urbanism certificate, including the OCPI Topographic Study visa, in the application stage, which requires long times for obtaining, delaying the process of completing the documentation of the application form and involving unduly costs if the investment is not funded.	Additional efforts at the stage of preparing the application form generating delays in the submission process	N.A.	

**Actions implemented to reduce administrative burden**

The main measures taken to reduce the administrative burden for potential beneficiaries were:

- Online submission of the application forms;
- The conclusion of a collaboration protocol with NAPP (National Agency for Public Procurement), starting 2016, through which standardized data sheets have been produced, in order to be used by the beneficiaries in the elaboration of the awarding documentation, so as to avoid the financial corrections caused by the poor performance of the awarding documentations. This model of practice has been recommended by the European Commission also to the other Member States;
- Removing the progress reports from payment procedures;
- Elimination of the intermediate certificates of acceptance prior to the certificates of acceptance for performance, for the machines (in the specific authorization procedure for payments, for the investment measures, were required all the delivering and receiving certificates/ certificates of acceptance).
- Steps undertaken to facilitate on-line submission of payment requests.

**Actions carried out in other member states / regions to reduce administrative burdens**

In Tuscany, for verifying the congruity and reasonableness of the costs of single operations, reference is made to:

- Price lists, which are regularly updated, including in the case of construction works that can be quantified (eg foundation excavations, structures, landscaping, etc.);
- Purchasing quotas from several suppliers in the case of the acquisition of tangible assets (eg plant, machinery, equipment and components / construction works not measured or not included in the elements of the price lists used)

Also, to mitigate and eliminate the risks at the level of payment requests, the following were applied:

- a unique information system for submitting applications for funding / payment based on a guide that facilitates the identification of eligible costs and allows access to certified databases for cross-checking related to accessing, selection and contribution requirements;
- checklists on the audited items, the methods and results of controls performed to ensure operational uniformity;
- unitary procedures for managing variations / changes during project execution;
- operational manuals for the management of the payment request verification phase.

**Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

Until the end of June 2018, out of the 307 (including 10 projects under 4.3 ITI) projects contracted on sM 4.3, only 1 was finalized and 3 were cancelled. All the 3 cancelled projects concerned the irrigation component, which highlights the fact that for this component are encountered more problems in the implementation of the projects compared to the projects aiming the development and modernization of the agricultural or forestry infrastructure. However, it should also be taken into account the fact that on the irrigation component were contracted more projects compared to the other two components of the submeasure.

Regarding the distribution of the 307 projects, on the three components of the sub-measure, the recorded situation is as it follows:

No. of contracted projects			No. of finalized projects			No. of cancelled projects		
Irrigations	Agriculture	Forestry	Irrigations	Agriculture	Forestry	Irrigations	Agriculture	Forestry
166	76	65	0	1	0	3	0	0

**Analysis of eligibility and selection criteria**

The selection criteria set for the three components of submeasure 4.3 are presented below.

<b>Selection criteria – IRRIGATION</b>	<b>Maximum score</b>
SC 1 The principle of water economy	- Maximum 20 points
SC 2 Principle of the surfaces served - Irrigable area through the project	- Maximum 40 points
SC 3 The principle of supplying directly from the source or in gravity system	- Maximum 20 points
SC 4 The principle of complementarity with investments for the modernization of downstream irrigation systems	- Maximum 20 points

<b>Selection criteria – AGRICULTURE</b>	<b>Maximum score</b>
SC 1 The principle of the multiple purpose of the investment objective	- Maximum 30 points
SC 2 Principle of the agricultural land served - Accessibility projects serving a large agricultural area	- Maximum 60 points
SC3 The principle of complementarity with the fruit growing subprogramme	- Maximum 10 points

<b>Selection criteria – FORESTRY</b>	<b>Maximum score</b>
SC 1 The principle of accessing forest areas through new investments	- Maximum 60 points
SC 2 The principle of the forest area served	- Maximum 40 points

No specific problems have been identified regarding the application and compliance with the selection criteria on this sub-measure, the selection criteria being considered relevant to prioritize the projects with an effective contribution to the achievement of the objectives of the strategy. However, in the case of the agricultural component of the submeasure, there were many projects that received the maximum score, so that the rank had to be made according to the length of the agricultural road made through the project, in the sense of prioritizing the longer roads.



**Proposal to reduce the administrative burdens**

Stage	Proposals to reduce the administrative burdens	Expected effects
<b>Application</b>	Improving the prescoring system by setting a minimum monthly threshold high enough to prevent the submission of a large number of projects (including in the first month of continuous submission).	Reducing the workload allocated to verify all the projects that exceed the minimum quality threshold set for the application sessions
	Elimination of the request for the notices listed in the urbanism certificate, including the OCPI Topographic Study visa, at the stage of submitting the application for funding and requesting them in the contracting stage.	Reducing the administrative burden for applicants and facilitate the process of preparing the application forms
<b>Selection</b>	Restructuring of the selection and hierarchization criteria for sub-measure 4.3 agriculture in order to avoid the non-financing of the projects that received the maximum score. In this respect, it is proposed that prior to adopting the selection and hierarchization criteria, a simulation to test the criteria and the identification of potential risks would result in these criteria generating the same score by a large number of projects. If such risks are identified, the selection and hierarchization criteria should be modified to add additional criteria or to restructure the way the points are awarded for each criterion (more strictly conditions for awarding the maximum points).	A better prioritization of the projects
<b>Implementation</b>	Online submission of the payment requests	Facilitating the process of submitting the payment requests by the beneficiaries
	The online approval of the awarding documentations submitted by the public beneficiaries, by AFRI and NAPP	Reducing the time needed for approving the awarding documentations
<b>Monitoring</b>	N.A.	

## sM 6.1 Installation of young farmers

### Overview of the submeasure

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Improving the management, increasing the competitiveness of the agricultural sector and supporting the modernization process, as well as compliance with the requirements of environmental protection, hygiene and animal welfare and safety at work.</li> <li>Increasing the number of young farmers who start for the first time an agricultural activity as holding's heads / managers, promoting short supply chains, increasing competitiveness and increasing focus on partnerships.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>the young farmer in compliance with the definition laid down in Art. 2 in R(EU) no 1305/2013<sup>5</sup>, setting up as sole head of the agricultural holding;</li> <li>legal person with several shareholders where a young farmer in compliance with Art. 2 in R(EU) no 1305/2013 has an effective long term control in terms of decisions regarding the management, benefits and financial risks and holds at least 50%+1 of the total shares.</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>setting up for the first time of young farmers as heads / managers of an agricultural holding</li> </ul>
<b>Procedural flow</b>	<p>Stage I: Registration of the young farmer (to be installed) at the Trade Register Office as a micro-enterprise / small enterprise having for the first time activity in the agricultural field, with a maximum of 24 months before submitting the Application Form (meanwhile, the farmer prepares the Business Plan , organizes the administrative activities, acquires goods for the new enterprise etc.) and the registration at APIA and/or at the Register of the Holding from NASVFS / DSVFS of the holding owned by the economic entity requesting support is done within the same period of maximum 24 months. This stage must be completed before submitting the Application form for this submeasure.</p> <p>Stage II: Submission and registration of the Application Form accompanied by the Business Plan and the binding documents (supporting documents related to the material basis with the assets held at the time of submitting the Application Form), as well as the annexed documents;</p>

<sup>5</sup> Art. 2 (1) n -„young farmer "means a person up to the age of 40 at the time of submitting the application form, who possesses the appropriate professional skills and qualifications and who is established for the first time on an agricultural holding as head of that holding;



	<ul style="list-style-type: none"><li>o the implementation of the Business Plan must begin no later than 9 months from the date of the decision to grant support;</li><li>o before requesting the second payment tranche, the beneficiary shall provide evidence of an increase in the economic performance of the holding by marketing its own production of at least 20% of the value of the first payment tranche.</li></ul> <p>Stage III: The installation of the young farmer is considered completed at the time of the correct implementation of the Business Plan (ie when the second tranche is granted).</p> <ul style="list-style-type: none"><li>o the applicant undertakes to become an active farmer within 18 months from the date of completion of the installation.</li></ul>
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### ***Analysis of the implementation flow***

The access rate for submeasure 6.1 was very high, with a significant success in implementation. The submeasure is implemented through the Agency for Financing Rural Investment and regional bodies and includes the procedural flow described below. The procedural flow starts by submitting the dossier of the application form, which includes the application form and the annexed documents (including the business plan) and is submitted by the applicant via the online platform.

Afterwards, the verification of the eligibility of the applicant is made, the verification of the eligibility criteria and the verification of the business plan, followed by the on site verification by the entity that processes the Application Form, namely COFRI - for all the application forms. The purpose of the on site verification is to check the data and information contained in the technical and administrative annexes with the elements existing on the proposed site. The expert compares the verification of certain eligibility criteria on the basis of the documents (the administrative verification stage) with the reality, in order to ensure the correctness of the information.

The selection of projects is carried out on the basis of the defined selection criteria, stating that the public financial allocation of the submeasure related to the continuous submission session, the selection criteria, the selection scores, the criteria for the prioritization and the minimum threshold are made on the initiative of the MA NRDP with the prior consultation of the Monitoring Committee.

In order to conclude the Financing Contract, AFRI informs all the applicants selected for contracting that they are required to have an electronic signature at the time of contracting, thus facilitating the transfer to the digital infrastructure. Subsequently, is made the verification of the documents, in original, requested for the signing of the contract, which must correspond to the information initially included in the application form.

The valability of the contract represents the duration of the implementation of the Financing Contract plus three years of monitoring since the last payment made by the Contracting Authority. The support for setting up young farmers comes in two payment tranches: the first tranche will be granted on the date of approving



the support request by the AFRI and represents 75% of the amount of installation support; the second tranche is of 25% of the amount of installation support and will be granted when fulfilling the actions set out in the Business Plan.

The main problems encountered in the implementation of the submeasure were recorded at the launch of the submeasure, mainly with regard to the general and additional objectives to be included in the business plan. Additional clarifications have been made along the way to understand the requirements properly..

In addition, through the analysis has been found that the legislative changes (at national level) can have a significant impact on the beneficiaries of the NRDP 2014-2020 measures, some provisions generating major risks for farmers (especially for the livestock sector, but also for the vegetal sector). For example, it was introduced the Order no. 119/2014 of the Ministry of Health for the approval of Hygiene and Public Health Norms on the living environment of the population, based on which minimum sanitary protection distances are established between the protected territories and the units which cause discomfort and health risks to the population. Thus, a number of difficulties have been created at the level of the sM 6.1 beneficiaries with respect to compliance with the new rules, the beneficiaries risking even the closure of farms.

However, a number of measures to simplify the implementation process have been implemented to facilitate access to financing under sub-measure 6.1. However, the eligibility condition, for example, regarding the size of the holding, ranging from 12,000 to 50,000 SO, is not entirely appropriate to attract young rural farmers to financing, as many of the potential applicants do not hold holdings of this size.

The above-mentioned condition is not subject to overregulation as European legislation (EU Regulation 1305/2013 Article 19) is satisfied, according to which "*Member States shall define upper and lower thresholds to allow agricultural holdings to have access to support under paragraph (1) (a) (i) and (iii). The lower threshold established for support under paragraph 1 (a) (i) (young farmers) is higher than the upper threshold established for the support referred to in paragraph 1 (a) (iii) (development of small farms )* ", But the threshold for the economic size of the explorations, in the case of sM 6.3 and sM 6.1, could be reduced.

**Additional requirements (not covered by the European and national legislation) and potential effects**

Additional requirement	Intensity of requirement on the applicant	Intensity of requirement on the authorities responsible for managing and implementing sM	Degree of complexity of the requirement
Within a family, only one of the members (husband/wife) can receive support for installation through submeasure 6.1 - Support for the installation of young farmers.	The condition that only one family member (husband/wife) could benefit from installation support was established under the national law on common heritage.		

	Restrictive condition for applicants, provided that the national law also includes the option of separating the joint patrimony.		
Respecting precisely the business plan originally proposed, in the context of satisfying mandatory and additional objectives, but not <i>ad-literally</i> adhering to all the actions initially proposed to achieve the objectives.	Considering minor changes that may occur during implementation, the requirement is an additional one that restricts the development and capitalization of opportunities by the beneficiary, provided that the mandatory and additional objectives are satisfied.	Verification of all supporting documents for the strict observance of the business plan. Requesting and checking the invoices issued by the beneficiary etc.	

In the case of sM 6.1, a number of additional measures have been identified that hinder the application process and the project implementation. One of the issues raised, both through the questionnaire survey and the interviews and focus groups, is to adhere to the ad-literam business plan. This requirement is imposed for the achievement of the strategic objectives mentioned in the NRDP, but it restricts the development of the beneficiaries as well as the capitalization of the potential opportunities during the implementation period. Thus, it is recommended that in the proposed business plan to be highlighted the general and additional objectives, and that these can be achieved by any means during the implementation period and not necessarily by respecting the business plan ad-literam (Ex. the achievement of the marketing objective by selling 20 cattle. The achievement of the marketing objective can be achieved in monetary terms, not only by selling the 20 cattle but also by selling other animals).

In addition, another restrictive condition refers to the fact that only one of the members of a family (husband/wife) can access support within sM6.1.

### **Actions implemented to reduce administrative burden**

Stage	Measures taken
<b>Submission/ Implementation</b>	The possibility of reducing the economic size of the agricultural holding envisaged for the submission of the Financing form for the duration of the contract (as defined in the Financing Agreement) allowing a margin of maximum 15% for the fluctuation of the economic dimension without reducing the size of the holding below the minimum threshold established by the eligibility condition.
<b>Submission</b>	In the first sessions of call for proposals, the registration of the holding at APIA was required (being necessary to justify the ownership right), but currently is

	enough to submit the proof that the applicant made the request for the transfer of the holding from the transferor to the applicant and subsequently the applicant can prove the effective registration at APIA.
<b>Submission</b>	Using the extended Reference Pricing Database to assess the reasonableness of costs (the applicant does not have to provide price offers if the goods are found in the database).
<b>Submission</b>	Obtaining the land book extract by the Agency instead of the applicant.
<b>Submission</b>	Steps to complete the conclusion of a protocol with NAFA.
<b>Submission</b>	There are protocols in order to receive direct information: they are basically concluded with NSVFSA (the National Sanitary Veterinary and Food Safety Authority), Ministry of the Environment.
<b>Implementation</b>	Notification of the beneficiary 6 months prior to the submission of last payment installment in order to identify possible problems leading to the termination of the contracts and granting the Agency the support within the legislative limits to solve the problems

During the years 2015-2018 a number of changes were made to facilitate the application process within sM 6.1. In this context, the most relevant change is the possibility of reducing the economic size of the agricultural holding by 15%. Consequently, the application process was facilitated at the level of the submeasure, allowing the applicants to vary the size of the economic holding during the implementation period. However, the agricultural holdings must exceed the minimum threshold of 12.000 SO, which still hinders the access for very small farms - in the same regard, the setting-up of young farmers as holding heads is not favored, as in the current context development of Romania, most potential applicants do not have the necessary resources to implement the project under the current conditions.

At the same time, a series of measures were taken at the level of sM 6.1 to facilitate the application process, referring to the reduction of the number of required supporting documents. This type of measure has positive effects considering that a high number of beneficiaries consider that many of the requested documents have a reduced utility for implementing the project.

### ***Actions carried out in other member states / regions to reduce administrative burdens***

In analyzing the various rural development programmes, there is a certain level of inherent overregulation taking into account the lessons learnt during the previous programming period and the need to stimulate an effective reform in agriculture.

In this respect, the Veneto region introduced at the level of sub-measure a number of criteria similar to those used in Romania. The following are thus considered ineligible:

- establishment of new farms by splitting a pre-existing company in the field;
- the transfer of ownership of the company, even under quotas, between spouses;
- providing more than one installment grant per enterprise



Also in the Aragona region, in the case of this sub-measure, it was requested that the applicants:

- have not been owners of a holding whose net margin exceeds 20% of the reference income;
- to undertake to install on a farm that qualifies as a priority at the time of installation;
- to undertake a personal contribution of at least 0.5 ATU to the farm where it is installed

Moreover, at the level of the Aragona region, for the procedural simplification, the business plan is unique, if the young farmer who is installing simultaneously asks for support through sM 4.1. In this case, the investments of the plan corresponding to the modernization will be assessed in accordance with the criteria defined under sub-measure 4.1.

In the Veneto region, the following solutions have been adopted to simplify the procedure

- conducting informative activities for beneficiaries in order to clarify the procedures for drawing up the business plan;
- preparing a standardised business plan that applicants must fill in when submitting their application for support.

#### ***Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)***

No. of contracted projects	No. of finalized projects	No. of cancelled projects
9.967	756	11

By June 2018, there were a total of 9.967 (including 201 projects under ITI) contracted projects, of which 756 completed (7,75%) and only 11 cancelled. Under the current circumstances, no major problems are identified that would cause the termination of contracts.

#### ***Analysis of eligibility and selection criteria***

In the case of sM 6.1 there were no changes in the selection criteria in the 2014-2018 period.

Selection criteria	Maximum score awarded for the selection criterion (most recent session)
SC 1 - <i>The principle of the priority sector targeting the zootechnical sector (cattle, beekeeping, sheep and goats) and the vegetal sector (vegetable growing, including seedlings, fruit growing and seed production)</i>	Maximum 30 points (session 2018)



SC 2 - <i>The principle of combining holdings taking into account the number of holdings wholly taken over</i>	Maximum 15 points (session 2018)
SC 3 - <i>The principle of the level of qualification in the agricultural field</i>	Maximum 25 points (session 2018)
SC 4 - <i>The principle of agricultural potential targeting areas with potential based on specialized studies</i>	Maximum 25 points (session 2018)
SC 5 - <i>The principle of native breeds / varieties</i>	Maximum 5 points (session 2018)

Thus, at the level of sM 6.1 there are 5 selection criteria, on the basis of which the score is allocated and the delimitation of the projects is made. The biggest share is owned by the selection criterion 1 - The principle of the priority sector (zootechnical / vegetal), which identifies the main activity field of the holding, based on the field of activity being also established the total SO. Based on the analysis of the average score obtained by the beneficiaries, the SC1 records the closest values to the maximum (average of 28,66 points).

In addition, a high share is also covered by SC 3 and SC 4 (each representing maximum 25%) - the justification is that it is aimed at capitalizing the areas with high potential, as well as the valorisation of the high level of qualification among the beneficiaries. However, it is noted that the level of qualification of the beneficiaries is low (the average of the score registered by the beneficiaries is 10,50 points).

In case of criterium 2 - The principle of combining holdings, registers the lowest values of the average score (1,76 points out of a maximum of 15 points) emphasizing that the beneficiaries did not choose to merge several farms. One possible explanation is that the usefulness / feasibility of land consolidation is reduced from the point of view of the beneficiaries, given that the maximum score for SC 1 can be obtained without the full takeover of other agricultural holdings.

### Proposals to reduce the administrative burdens

Stage	Proposals to reduce the administrative burdens	Expected effects
<b>Application</b>	N.A.	N.A.
<b>Selection</b>	N.A.	N.A.
<b>Implementation</b>	N.A.	N.A.
<b>Monitoring</b>	Modifying the monitoring plan for the implementation stage of the business plan, offering the possibility of making changes to the business plan according to the specificity of the sales market or the current development situation, while meeting the overall objectives. It is recommended that some minor changes to the business plan can be performed without prior notification of the managing authority.	Facilitates the development of agricultural holdings by capitalizing on the market opportunities that emerged during the implementation of the project. Reduces the administrative burden on the Managing Authority to verify that the business plan is fully respected.



**SM 6.2 Support for the establishment of non-agricultural activities in rural areas**

**Overview of the submeasure**

<b>Objectives</b>	<ul style="list-style-type: none"> <li>• diversifying the rural economy by increasing the number of micro and small enterprises in the non-agricultural sector, developing services and creating jobs in rural areas;</li> <li>• encouraging the maintenance and development of traditional handicraft activities.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>• Farmers or members of an agricultural household that diversify their activity by setting up a non-agricultural activity in rural areas for the first time;</li> <li>• Micro-enterprises and small enterprises existing in the rural area, which offer non-agricultural activities, which they have not carried out until the application for support;</li> <li>• New micro and small enterprises set up in the year of submission of the application form or with a maximum of 3 tax years, which did not carry out activities until the moment of submitting the application form (start-ups).</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>• Production activities (eg manufacture of textiles, clothing, leather goods, paper and paperboard; manufacture of chemicals, pharmaceuticals products; woodworking activities (production of biomass fuel - eg pelleting); metallurgy , manufacture of metal constructions, machinery, machinery and equipment; manufacture of electrical, electronic products) for the marketing, production and use of renewable energy to carry out its own activities as an integral part of the project etc.;</li> <li>• Handicraft activities - eg handicrafts and other non-agricultural traditional activities (eg pottery, embroidery, handmade iron, wool, wood, leather etc.) as defined in Chapter 4.4.;</li> <li>• Tourist activities (eg: agro-tourist accommodation services, accommodation services in trailer parks, camping and holiday camps, recreational tourist services dependent or independent of an agro-tourist reception structure with functions of accommodation and food services, catering services, tourist guide services;</li> <li>• Services (eg. medical, sanitary-veterinary; car repair, tools, household items; consultancy, accounting, legal services, audit; IT services; technical, administrative services, other services for the rural population etc.).</li> </ul>
<b>Procedural flow</b>	<p>Application:</p> <ul style="list-style-type: none"> <li>• The fill in of the application form, including its annexes, will be done according to the standard template.</li> <li>• The dossier of the application form file includes the completed application form and the attached documents (according to the List of Documents - Part E of the application form), which will be scanned and submitted on-line.</li> </ul> <p>Selection:</p>



	<ul style="list-style-type: none"><li>• Checking the eligibility of the application forms;</li><li>• On site verification of the application forms;</li><li>• Checking the selection criteria;</li><li>• Selection of projects;</li><li>• Contracting of non-refundable support</li></ul> <p>Implementation:</p> <ul style="list-style-type: none"><li>• The first payment request will be submitted within 30 days from signing the Grant Contract and represents 70% of the amount of support. The payment will be made within 90 days by the date of declaring the request for payment compliant by AFRI.</li><li>• Respecting the compliance of the activities undertaken, the results and the achievement of the objectives in relation to the proposed business plan.</li><li>• The second payment will be made following the verification of compliance with the business plan.</li></ul> <p>Monitoring/Sustainability</p> <ul style="list-style-type: none"><li>• Monitoring for 3 years after the end of the business plan execution.</li></ul>
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### **Analysis of the implementation flow**

The submeasure 6.2 is implemented through the Agency for Financing Rural Investment and the regional bodies. The dossier of the application form includes the application form and the annexed documents (according to the list and the standard template) and is submitted by the applicant via the online platform. An important aspect is that the related documentation should not be signed and stamped on each page. The applicant assumes the veracity of the documents, and if in the moment of the original submission are discovered inconsistencies that affect the eligibility or selection conditions, the project will be declared ineligible.

After this, is made the verification of the eligibility of the application form by AFRI, followed by the on site verification by the entity that processes the Application Form, namely COFRI - when changing the destination of a building - for agribusinesses and whenever the expert from the Authority, with the approval of the manager, considers it necessary. The purpose of the on site verification is to check the data and information contained in the technical and administrative annexes with the elements existing on the proposed site. The expert compares the verification of certain eligibility criteria on the basis of the documents (the administrative verification stage) with the reality, in order to ensure the correctness of the information. For example, there is a risk of having a project in which the objective is to build a 2-flat pension, but it already exists or there is already a building with started work. In this last example, a distinction has to be made between what exists and what is financed through the project after contracting.

The selection of projects is carried out on the basis of the defined selection criteria, stating that the public financial allocation of the submeasure related to the continuous submission session, the selection criteria,



the selection scores, the criteria for the prioritization and the minimum threshold are made on the initiative of the MA NRDP with the prior consultation of the Monitoring Committee.

The duration of the grant contract is 60 months - the duration of achieving the objectives and the correct implementation of the Business Plan, no more than 57 months from the signing of the contract and represents the deadline for the beneficiary to submit the request for the second tranche payment, plus a maximum of 90 calendar days for performing the second tranche payment - and the monitoring of the activities is of 3 years from the date of the last payment.

Until June 2018, the submeasure was strongly accessed, for the future being needed a larger allocation. It is a reliable measure from the point of view of the provisions, and in the territory the differences are seen through the diversity of small investments supported in rural areas. In order to increase the access to this submeasure, a number of simplification measures have been introduced, as presented below.

**Additional requirements (not covered by the European and national legislation) and potential effects**

<b>Additional requirement</b>	<b>Intensity of requirement on the applicant</b>	<b>Intensity of requirement on the authorities responsible for managing and implementing sM</b>	<b>Degree of complexity of the requirement</b>
Verification of eligibility and selection criteria is doubled, being carried out once at the project evaluation and once again in the pre-contracting stage. The justification is that the check envisaged for the first payment was moved to the pre-contracting phase.	N.A.	Double verification of eligibility and selection criteria over a relatively short period of time (no significant changes regarding the compliance with the criteria are involved)	
Providing the documents in originals (signed / stamped)	Obtaining the supporting documents in original (payment orders, invoices etc.)		

At sM 6.2 level it was identified that the managing authority (AFRI) performs a double check of the eligibility and selection criteria. Thus, a first check is carried out at the project selection / evaluation stage and a second verification in the pre-contracting stage. According to the information obtained, the verification of the criteria in the pre-contracting stage was introduced to remove the check from the first payment, but the time

between the two checks is extremely low - there are no significant changes in compliance with the criteria - thus the process has a low utility.

At the same time, through the mix of methods used to obtain the information, it was determined that most of the supporting documents are required in original (stamped / signed). Given the transition to a digitized system, the requirement is an additional one that prevents the good progress of the verification process - in many cases the beneficiaries can not provide the original supporting documents because of the way they work with different suppliers / economic operators.

**Actions implemented to reduce administrative burden**

Stage	Measures taken
<b>Submission</b>	The documentation required to access this submeasure has been simplified, the application form includes a simple business plan (for which there is a template on the website), and the requested supporting documentation is also reduced. Some of the permits or other supporting documents are requested at the contracting stage or even at the payment stage and not at the submission stage. Under this submeasure, it was possible to submit a grant application under multiple CAEN codes (for multiple types of activities).
<b>Submission</b>	Currently, AFRI has access to RECOM (the database of the National Trade Register Office) for verifying shareholdings, linkages between firms, and being checked the own databases of AFRI in order to avoid double funding. There is also the common interface of APIA for checking the agricultural activity and the database of the Competition Council.
<b>Submission</b>	Obtaining the land book extract by the Agency instead of the applicant.
<b>Submission</b>	In the process of finalizing a collaboration protocol with NAFA.
<b>Selection</b>	There is the possibility of having submitted projects that exceed the 200% threshold, the rule being to maintain the deadline for submitting projects for 5 days (or until the 200% threshold is reached). The project submission session will remain open for a minimum of 5 days, regardless of whether or not the 200% threshold is reached. After the 5-day period, the session remains open until the threshold of 200% of the submeasure is reached.
<b>Implementation</b>	Procedural improvements, adapted to the economic and social practice (eg the possibility to give up the land acquisition, within the submeasure 6.2, the possibility of moving the site in the same TAU / neighboring TAU for the investments that do not involve complex investments with constructions, in duly justified cases).
<b>Implementation</b>	Notification of the beneficiary 6 months prior to the submission of the last payment installment in order to identify possible problems leading to termination of the contracts and granting the Agency the support within the limits of the law in order to solve the problems.
<b>Monitoring</b>	Reducing the project monitoring period.



At the submeasure 6.2 level, the maximum budget ceiling available for funding was reached (funds are available only in the ITI Danube Delta area), due to the high attractiveness of the submeasure, but also to the simplification processes. In this respect, we mention that at the level of SM 6.2 a number of simplifications were made regarding the documents requested from the applicants, significantly reducing their number (a number of supporting documents are provided at the contracting or payment stage). In addition, a number of procedural improvements have been made, for example - the possibility to give up on the land acquisition, the possibility of moving the site within the same TAU.

### **Actions carried out in other member states / regions to reduce administrative burdens**

None of the selected regions or Ireland (benchmark analysis) have implemented this sub-measure.

### **Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

No. of contracted projects	No. of finalized projects	No. of cancelled projects
1883	60	9

On this submeasure there are 1.833 (including 53 projects under ITI) projects contracted during the current implementation period, of which 60 were finalized (3,3%) and only 9 were cancelled.

### **Analysis of eligibility and selection criteria**

Selection criteria	Maximum score awarded for selection criterion
SC 1 The principle of diversification of agricultural activity of farmers / members of agricultural household towards non agricultural activities	Session 2015 – Maximum 25 points Session 2018 – Maximum 20 points
SC 2 Prioritization of sectors with growth potential in accordance with the National Competitiveness Strategy or the Integrated Strategy for Sustainable Development of the Danube Delta	Session 2015 – Maximum 40 points Session 2018 – Maximum 45 points
SC 3 The principle of stimulating the tourist activities in the sense of prioritizing agrotourism activities in areas with high tourist potential / ecotourism destinations / areas with protected natural areas.	Session 2015 – Maximum 20 points Session 2018 – Maximum 10 points
SC 4 The principle of stimulating a high level of quality of the business plan, which will be set according to the marketed	Session 2015 – Maximum 15 points Session 2018 – Maximum 25 points

production or the activities performed, in excess of 30% of the value of the first payment tranche.

La At the level of sM 6.2 a set of principles were selected for selecting the selection criteria as follows:

1. The principle of diversification of agricultural activity of farmers / members of agricultural household towards non agricultural activities.
2. Prioritization of sectors with growth potential in accordance with the National Competitiveness Strategy or the Integrated Strategy for Sustainable Development of the Danube Delta.
3. The principle of stimulating the tourist activities in the sense of prioritizing agrotourism activities in areas with high tourist potential / ecotourism destinations / areas with protected natural areas, which were established in accordance with the Emergency Ordinance no. 142/2008 on the approval of the National Landscape Plan.
4. The principle of stimulating a high level of quality of the business plan, which will be set according to the marketed production or the activities performed, in excess of 30% of the value of the first payment tranche.

Also, in order to comply with the implementation strategy of the sub-measure, a number of changes were made regarding the maximum score awarded at the selection criterion level.

In conclusion, it is noted that there is a score of up to 45 points (initially 40 points) for SC 2, in order to achieve the development of sectors with potential for growth. At the same time, a maximum of 20 points (initially 25 points) is granted for SC 1 - diversification towards non-agricultural activities. On the other hand, it is noticed that during the implementation of the programme, the attractiveness to tourism activities was intended to decrease and an attempt was made to stimulate the increase of the quality level of the business plan - these changes occurred due to the high number of projects and because of the wish to select high impact projects.

### **Proposals to reduce the administrative burdens**

Stage	Proposals to reduce the administrative burdens	Expected effects
<b>Application</b>	N.A.	N.A.
<b>Selection/ Implementation</b>	<p>The eligibility and selection criteria will be checked only once, at the time of the selection of the projects.</p> <p>Documents already requested and submitted by the beneficiaries at the time of submission of the grant application and already verified by the managing authority will no longer be re-verified at the pre-contracting stage.</p>	<p>Reduce the administrative burden on AFIR. Facilitating the submission process for applicants.</p> <p>By doing so, double verification of supporting documents from beneficiaries will be avoided.</p>

Stage	Proposals to reduce the administrative burdens	Expected effects
	For the beneficiary requirement to maintain the eligibility and selection criteria, it is recommended to use the selfdeclaration - thus, the verification process of this condition will only be used at the time of the selection of the grant application and at the end of the project monitoring period.	
Monitoring	N.A.	N.A.

### sM 6.3 Support for the development of small farms

#### Overview of the sub-measure

<b>Objective</b>	<ul style="list-style-type: none"> <li>Improving the management of the agricultural holding;</li> <li>Increasing the market orientation and income of small-scale agricultural holdings.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>Farmers whose holdings meet the small farm definition under the simplified scheme in Pillar 1 and have applied this scheme for at least one year, according to Title V of R (EU) No. 1307/2013.</li> </ul>
<b>Eligible activities</b>	The support is given to the small farm with the aim of facilitating the development of small farms based on the business plan (PA). All the expenditures proposed in the PA, including working capital and activities relevant for the correct implementation of the approved PA, can be eligible, regardless of their nature.
<b>Procedural flow</b>	<p>Submission:</p> <ul style="list-style-type: none"> <li>Filling in the financing request, the Business Plan and preparation of the supporting documents in electronic format, in Romanian</li> </ul> <p>Selection/ Contracting:</p> <ul style="list-style-type: none"> <li>Verifying the eligibility of the financing request</li> <li>Requesting additional information</li> <li>On the field verification;</li> <li>Verification of eligibility and selection criteria;</li> <li>Selection of projects;</li> <li>Submission of documents necessary for contracting;</li> <li>Verifying the compliance at the end of the financing decision</li> </ul> <p>Implementation:</p> <ul style="list-style-type: none"> <li>Submission of the payment dossier (Payment Request 1 and Payment Request 2);</li> </ul> <p>Monitoring/Sustainability:</p>



- |  |  |
|--|--|
|  | <ul style="list-style-type: none"><li>The Beneficiary will have to respect, during the entire contract duration, the conditions for the correct implementation of the Business Plan, ie the eligibility and selection conditions and / or the other objectives set out in the Business Plan.</li></ul> |
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### **Analysis of the implementation flow**

The procedural flow of the sub-measure 6.3 consists in the application, selection, contracting, implementation and monitoring and the sub-measure is implemented through the Agency for Rural Investment Financing and regional bodies. The procedural flow of the projects financed under this sub-measure is summarized in the above table. An important aspect is that the financing request dossier can only be submitted online at [www.afir.info](http://www.afir.info), with the applicants having to create a user account within this portal. This process also encourages the electronic signing of electronic documents submitted by the applicants in order to access the granted funds. In what concerns the submission phase of the projects, the difficulties encountered by the applicants are caused by the lack of access to the internet or the lack of knowledge of how to use the internet. In this respect, the farmers have used the helpdesk service, addressing in particular questions about the installation conditions that young farmers have to meet: workplace, establishment of the headquarters, implementation of the business plan, qualification requirements, types of documents accepted for eligibility (certificates, diplomas), etc.

The sub-measure requires the field verification through on-site visit, carried out only in the presence of the legal representative of the applicant. This is done by the entity that processes the Financing Requests, ie COFRI - for all the Financing Requests, to verify the data and information contained in the technical and administrative annexes with the elements existing on the proposed site. The expert compares the verification of certain eligibility and selection criteria stated by the documents (the administrative verification stage) with the reality, in order to ensure the correctness of the information.

The payment requests are submitted in two installments, the first representing 75% of the amount of non-reimbursable financial support, in maximum 30 days from the moment when the Beneficiary signed the acknowledgment of the Financing Decision signed by the Deputy General Director of RCRIF. The second installment of the payment request representing 25% of the amount of non-reimbursable financial support is submitted after reaching the objectives of the business plan within a maximum of 33 months (57 months for the fruit sector) from the date of signature of the Financing Decision.

Beneficiaries of the sM 6.1 have the obligation to realize the business plan in a period of 3 years, after which they have the possibility to continue the development of the farm set up by investing under the sM 4.1.

The sub-measure had a high level of interest shown by the applicants and although there were changes in the implementation flow, relatively few changes had a significant impact on the implementation process. In addition, some legislative changes (at national level) may have a significant impact on the beneficiaries of the sub-measure 6.3. For example, Order no. 119/2014 of the Ministry of Health for the approval of Hygiene and Public Health Norms on the living environment of the population, based on which minimum sanitary

protection distances are established between the protected territories and the units which cause discomfort and health risks to the population. There is also an example of an extensive obligation for farmers to have manure storage capacities (in an individual and/or communal system). In this regard, the European legislation mentions the obligation for Member States to include in the codes of good practice rules on "capacity and construction of reservoirs for the storage of effluents from zootechnical complexes". However, the Farmer's Guide on Ecoconditionality provides for the obligation for farmers to dispose of manure storage facilities without structural defects whose size exceeds the need for manure storage (but there is also the possibility of temporary storage on the field subject to certain restrictions), taking into account the longest period of prohibition for the application of organic fertilizers to agricultural land. Thus, project beneficiaries have reported major difficulties in complying with the required provisions.

**Additional requirements (not covered by the European and national legislation) and potential effects**

<i>Additional requirement</i>	<i>Intensity of requirement on the applicant</i>	<i>Intensity of requirement on the authorities responsible for managing and implementing SM</i>	<i>Degree of complexity of the requirement</i>
The condition that the applicant has established his residence/ registered office in the Territorial Administrative Unit in which the holding is registered. Applicant's place of work should be in the same TAU or in the neighborhood of the TAU in which the holding is registered	Restriction under the conditions in which the project implementation location remains the one established by the financing request. At the same time, the condition does not provide certainty about the proper management of the holding or the proper implementation of the business plan, which is the responsibility of the beneficiary, assuming it at the time of submission / contracting.	NA	
Within a family (husband/wife), only one of the members can benefit from support, regardless of the organization of the family members for accessing sub-the measure 6.3 (PFA, II, IF, SRL).	The requirement related to the fact that within a family, only one of the members (husband-wife) could be supported for the installation, was established based on the national law on common patrimony. Restrictive condition for applicants, considering that the national law also includes the	N.A.	



<i>Additional requirement</i>	<i>Intensity of requirement on the applicant</i>	<i>Intensity of requirement on the authorities responsible for managing and implementing SM</i>	<i>Degree of complexity of the requirement</i>
	option of separating the common patrimony.		
Requesting irrelevant supporting documents in the context of the implementation of certain projects (negations, classification of the notification, obtaining a document from the Environmental Guard and the Public Health Directorate)	Obtaining these documents involves an additional effort for the beneficiary.	Additional administrative burden for verifying the documents compliance (considering that some supporting documents are not useful - depending on the project's specificity)	
Respecting the business plan as originally proposed.	Additional condition in the context in which the objectives planned in the business plan can be achieved without literally following what was originally presented in the plan		

Sub-measure 6.3 presents a set of conditionalities imposed in addition to European rules. Thus, at the level of the sub-measure, the condition that the applicant has his / her domicile / registered office as well as the workplace in the TAU where the holding is registered is identified as a totally restrictive condition since the objectives imposed by the business plan can be fulfilled without respecting these conditions. At the same time, given the wide scope of activity of the sub-measure, beneficiaries are required the same set of agreements/supporting documents, regardless of the specificity of their activity.

Moreover, the additional requirement for ad-literam compliance with the business plan (a general condition at the level of the sub-measures that foresee the elaboration of a business plan) has been identified, a condition that could be eliminated as long as the overall objectives of the business plan are met. This request is imposed for the achievement of the strategic objectives mentioned in the NRDP, but it restricts the development of the beneficiaries, as well as the capitalization on the potential opportunities during the implementation period. Thus, it is recommended that the proposed business plan should highlight the general and additional objectives and that these can be achieved by any means that have arisen during the implementation period and not necessarily by respecting ad-literam the business plan.



**Actions implemented to reduce the administrative burden**

Stage	Actions implemented
Submission	<ul style="list-style-type: none"> <li>The minimum educational / professional training level of the applicant to be at least 8th grade, in the sense in which initially the threshold was established for a minimum of 10 classes - taking into account the minimum criteria required by law</li> </ul>
Submission	<ul style="list-style-type: none"> <li>Online application of the financing requests through the SPCDR informatic system</li> </ul>
Submission	<ul style="list-style-type: none"> <li>Using the extended Price Reference Database to assess the reasonableness of costs (the applicant no longer has to provide price offers if the goods are found in the database).</li> </ul>
Submission	<ul style="list-style-type: none"> <li>Obtaining the land book extract by the Agency instead of the applicant</li> </ul>
Submission	<ul style="list-style-type: none"> <li>In the process of finalizing a collaboration protocol with NAFA.</li> </ul>
Contracting	N.A.
Implementation	<ul style="list-style-type: none"> <li>The possibility of reducing the economic size of the agricultural holding envisaged for the submission of the Financing Request during the execution of the contract (as defined in the Financing Contract), allowing a margin of maximum 15% for the fluctuation of the economic dimension without lowering the size of the holding below the minimum threshold established through the eligibility condition.</li> </ul>
Implementare	<ul style="list-style-type: none"> <li>Notification of the beneficiary 6 months prior to the submission of the last payment installment in order to identify possible problems leading to termination of the contracts and granting the Agency the support within the legislative limits to solve the problems.</li> </ul>

**Actions carried out in other member states / regions to reduce administrative burdens**

None of the selected regions or Ireland have implemented this sub-measure.

**Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored the programme implementation)**

No. of contracted projects	No. of finalized projects	No. of cancelled projects
7.678	181	6

At the level of sub-measure 6.3, there were 7,678 contracted projects (including 75 ITI area projects), out of which 181 (2,4%) completed and 6 cancelled, by the end of June 2018.

### Analysis of the selection criteria

Selection criteria	Maximum score granted for the selection criteria
SC 1 The principle of the level of qualification in the agricultural field (depending on the level of education and / or qualification in the agricultural field)	<ul style="list-style-type: none"> <li>- Maximum 20 points (session 2015)</li> <li>- Maximum 20 points (session 2018)</li> </ul>
SC 2 The principle of the priority sector targeting the livestock sector (cattle, beekeeping, sheep and goats) and vegetable sector (vegetable growing, including the production of planting material, fruit growing and seed production).	<ul style="list-style-type: none"> <li>- Maximum 15 points (session 2015)</li> <li>- Maximum 15 points (session 2018)</li> </ul>
SC 3 The principle of the agricultural potential of the area targeting the areas with potential determined based on the specialty studies	<ul style="list-style-type: none"> <li>- Maximum 30 points (session 2015)</li> <li>- Maximum 30 points (session 2018)</li> </ul>
SC 4 The principle of family farms	<ul style="list-style-type: none"> <li>- Maximum 30 points (session 2015)</li> <li>- Maximum 30 points (session 2018)</li> </ul>
SC 5 The principle of native breeds / varieties	<ul style="list-style-type: none"> <li>- Maximum 5 points (session 2015)</li> <li>- Maximum 5 points (session 2018)</li> </ul>

In order to pursue the objective of implementing the sub-measure, the following criteria were used to score the projects: 1. The principle of the level of qualification in the agricultural field (depending on the level of education and / or qualification in the agricultural field); 2. The principle of the priority sector targeting the livestock sector (cattle, beekeeping, sheep and goats) and vegetable sector (vegetable growing, including the production of planting material, fruit growing and seed production); 3. The principle of the agricultural potential of the area targeting the areas with potential determined based on the specialty studies; 4. The principle of family farms; 5. The principle of native breeds / varieties.

It can be noticed that the principle of the agricultural potential of the area occupies a share of 30% and records the highest average score at the level of the contracted projects (23,49 points). Practically, it is the main criterion targeted by the applicants for obtaining the score. In the same time, SC 4 - The principle of

family farms - occupies a percentage of 30%, but the average score is 3.90 points, which indicates a low focus on the family farms at the level of the NRDP beneficiaries.

In the case of SC 1 and SC 2, a score of more than half of the maximum is recorded, meaning that, on average, the qualification of the beneficiaries is limited to a minimum level I qualification course in the agricultural, agri-food, veterinary or agrarian economy field. Last but not least, the principle of native breeds / varieties is scarcely scored by the applicants, representing at the same time a criterion at which significant scoring differences (only 5%) can not be achieved.

**Proposals to reduce the administrative burdens**

Phase	Proposals to reduce the administrative burdens	Expected effects
<b>Submission</b>	<p>Elimination of the condition that the applicant has his/ her residence/registered office and workplace established in the Territorial Administrative Unit where the holding is registered.</p> <p>Or, the condition may be rephrased as follows: "the residence/registered office and workplace of the applicant is in the TAU where the investment is to be made or in an bordering area to a maximum distance of 50 km".</p>	<p>The proposed measure would reduce administrative boundaries and increase accessibility within the sub-measure in the sense that it would allow all potential beneficiaries to carry out activities in other ATUs. At the same time, it would facilitate the application process for the beneficiaries (they do not have to change their domicile or workplace). The contracting authority can ensure the proper management of the business plan only through the commitment that the beneficiary assumes when submitting / contracting</p>
<b>Implementation</b>	<p>Identifying the relevant approvals/supporting documents, depending on project specificity and requesting them accordingly. Clearly establishing the necessary supporting documents. (eg, for certain projects, the Environmental Notification or DSP Approval is not needed)</p>	<p>The proposed measure would reduce the administrative boundaries and would eliminate the process of obtaining the requested approvals on behalf of the beneficiary (in the context in which these documents are irrelevant and they make the application / implementation process more difficult). In the same time, the additional burden imposed to AFRI would be avoided by eliminating the verification of the approvals correctness.</p>
<b>Monitoring</b>	<p>Modifying the monitoring plan for the implementation stage of the business plan, offering the possibility of making changes to the business plan according to the specificity of the market or the</p>	<p>This measure facilitates the development of the agricultural holdings by capitalizing on the market opportunities that emerged during the implementation of the project. It reduces the</p>

Phase	Proposals to reduce the administrative burdens	Expected effects
	<p>current development situation, while meeting the general / additional objectives. It is recommended that certain changes to the business plan can be made without the prior notification of the managing authority. The managing authority will be notified only when changes are made to the general/ additional objectives assumed in the business plan and not when changes are made to the actions required to achieve these objectives (if changes do not alter the scores of the selection criteria).</p>	<p>administrative burden on the Managing Authority to verify that the business plan is fully respected (ad-literam).</p>

#### SM 6.4 Investing in the creation and development of non-agricultural activities

##### Overview of the sub-measure

<b>Objective</b>	<ul style="list-style-type: none"> <li>Stimulating the rural business environment, contributing to the increase of the number of non-agricultural activities carried out in rural areas;</li> <li>Development of existing non-agricultural activities; job creation, increasing rural population incomes and diminishing disparities between rural and urban areas;</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>Existing micro-enterprises and small enterprises in rural areas;</li> <li>Micro-enterprises and small-scale start-ups from rural areas that prove the co-financing;</li> <li>Farmers or members of agricultural farms that diversify their agricultural base activity by developing a non-agricultural activity within the enterprise already existing that is a micro and small enterprises;</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>Production activities (eg: manufacture of textiles, clothing, leather goods, paper and cardboard, manufacture of chemicals, pharmaceuticals, woodworking, metallurgy, manufacture of metallic constructions, machinery and equipment, manufacture of electrical and electronic products, etc.);</li> <li>Handicraft activities (eg handicrafts and other non-agricultural traditional activities (eg pottery, embroidery, hand processing of iron, wool, wood, leather, etc.);</li> <li>Touristic activities (eg: agrotouristical accommodation services, accommodation services in vans parks, campsite, touristical leisure services and public food, catering services, tourist guides services);</li> <li>Provision of services such as medical, social, sanitary-veterinary services; repairing machines, tools, household items; consultancy, accounting, legal, audit; information technology and information services; technical, administrative, etc., including</li> </ul>



	<p>construction, reconstruction and / or modernization of the spaces and areas related to the realization of the activities;</p> <ul style="list-style-type: none"> <li>• Manufacture of pellets and briquettes from biomass.</li> </ul>
<p><b>Procedural flow</b></p>	<p>Submission phase</p> <ul style="list-style-type: none"> <li>• Filling in and online submission of the Application Request and of the related annexes (prior registration of applicants on the AFRI website);</li> </ul> <p>Evaluation and selection phase</p> <ul style="list-style-type: none"> <li>• Classifying the Financial Request based on the prescoring: The financing request is checked from the eligibility and selection criteria perspective, if the self assessment of the applicant's score is greater than or equal to the quality threshold of the month in which the Application Form is submitted;</li> <li>• Verification of technical and financial eligibility consists of: checking the eligibility of the applicant; checking the eligibility criteria; verifying the indicative budget of the project; verification of the Feasibility Study and all the attached documents.</li> <li>• On-site verification is realized by the entities that process the Financing Request only for projects targeting modernization works, namely: COFRI - for Non-Construction Financing Requests; RCRIF - for Financing Request with construction-assembly;</li> <li>• Verification of the selection criteria: after the eligibility and selection criteria, the following situations may exist: the project is not eligible, in which case the applicant is notified; the project is inconsistent, in which case the applicant is informed; the project is eligible and will have a score <math>\geq</math> the monthly quality threshold, in which case the project will pass to the selection criteria verification phase;</li> <li>• The selection of eligible projects is in descending order of the selection score within the available allocation. A Selection Report will be published, and applicants may submit online complaints to be resolved by AFRI.</li> </ul> <p>Contracting phase</p> <ul style="list-style-type: none"> <li>• Within 4 months/7 months after receiving the notification on the selection of the Financing Request, the applicant will submit at the COFRI/RCRIF headquarters the necessary documents for the signature of the Financing Contract in its original form;</li> <li>• Signing the financing contract.</li> </ul> <p>Implementation phase</p> <ul style="list-style-type: none"> <li>• The Beneficiary can receive the amount of the advance only after receiving the AFRI favorable approval on at least one procurement procedure and only after signing the financing contract.</li> <li>• Carrying out the procurement procedures for goods, services and execution of works.</li> <li>• Submission of the file for the first payment installment and the supporting documents within 6 months from the date of signing the Financing Contract, in the case of projects for simple procurement investments, respectively within 12 months in the case of investment projects with construction-assembly, from the date of signing the Financing Contract.</li> </ul> <p>Monitoring phase:</p>



- Verification of fulfillment of the conditions assumed by the beneficiary.

### **Analysis of the implementation flow**

Sub-measure 6.4 implied an implementation flow that favored the submission of a large number of projects, with a high level of attractiveness among the potential beneficiaries. Sub-measure 6.4 also presents a territorial feature, with the sM 6.4 related to the ITI Danube Delta, and in general it has enjoyed a real success, with no problems in implementation.

The funds for the sM 6.4 at national level were exhausted in a very short time, following the launch of three project submission sessions, while the funds allocated to ITI were exhausted following two sessions for the submission of projects. In the case of sub-measure 6.4, in 2017, with the lowering of the threshold, projects were submitted with a total value of over 200% of the sub-measure allocation.

There have been some requests from beneficiaries to simplify the documentation requested at the time of submission of the projects. As a result of these requests, simplification actions have been taken during the three sessions: the selection criteria have changed, administrative procedures have been simplified. These changes in procedural flow have also emerged as a result of the flexibility shown by the authorities involved in managing the program in addressing the needs of the beneficiaries in order to facilitate the implementation of their projects.

During the call for proposal, the procedural flow has undergone some changes, such as renouncing to the presentation of some documents in the submission phase (approvals, agreements) and requesting them either at the contracting phase or at the payment phase. There have also been some procedural improvements tailored to economic and social practice, such as the prolongation of the submission period for certain documents. However, it is considered that the period from the application phase to the contracting phase is rather extensive, sometimes affecting the project budget.

Moreover, an eligibility criterion that has raised difficulties for the applicants and has led to a high rejection rate is that of proving the farmer status, but not because of the lack of documentation or the difficulty of obtaining it, but because of errors in the correct submission of the extracts from the Agricultural Register. These differences are found during the field verifications when inconsistencies with the information in the register are found.

The implementation flow of the sub-measure is generally fluidized, involving several public institutions (MA, AFRI) and measures to simplify the administrative procedures in order to facilitate the submission and implementation of projects on the one hand and the control and effective monitoring by the institutions responsible for managing the sub-measure.



**Additional requirements (not covered by the European and national legislation) and potential effects**

<b>Additional requirement</b>	<b>Intensity of requirement on the applicant</b>	<b>Intensity of requirement on the authorities responsible for managing and implementing SM</b>	<b>Degree of complexity of the requirement</b>
The condition regarding the location of the holding in the TAU in which the investment is to be made is a condition established by the NRDP on the basis of the conclusions of the Monitoring Committee and was created especially for agropensions	However, this requirement is more sensitive in cases where the location of the holding is in a TAU adjacent to the investment (the physical distance being reduced), thus creating barriers to accessing the sub-measure for farmers in such conditions.	NA	
The impossibility that an ineligible construction is realized with the own funds of the beneficiary and the obligation that the construction is realized through the procurement procedure.	This provision generates additional (administrative and time) difficulties for beneficiaries who have the possibility to realize the construction with their own funds, but are required to undertake all the procedural steps of a public procurement	NA	

Analyzing the issues that may lead to overregulation concerning submeasure 6.4, two requirements have been identified that are considered to cause difficulties in implementing the sub-measure. Thus, the condition regarding the location of the holding in the TAU in which the investment is to be made is a condition established by the NRDP on the basis of the conclusions of the Monitoring Committee and has been created especially for agropensions, as there is an order issued by the National Tourism Authority that states that in the case of agropensions, customers must be able to get involved in its activities and be served with products produced at its level. In this sense, it is necessary for the agro-pension to be in the same TAU with the holding so that there is no need to move customers to another location. However, this could be improved at the level of the Managing Authority by establishing a proximity area at a predetermined distance, which would allow the objective to be achieved.

Regarding the impossibility of an ineligible construction to be realized by the beneficiaries with their own funds, this is rather a punctual situation and it is proposed to be identified procedural solutions to solve it if the difficulty generalizes at the level of more beneficiaries of this sub-measure.

**Actions implemented to reduce the administrative burden**

Phase	Actions implemented
<b>Submission</b>	<ul style="list-style-type: none"> <li>• There were some requests from beneficiaries to simplify the documentation for the submission of the projects. As a result of these requests, simplified actions were taken during the three sessions launched, such as:               <ul style="list-style-type: none"> <li>➤ the selection criteria have been changed;</li> <li>➤ procedures related to administrative documents have been simplified;</li> <li>➤ the number of documents submitted by the beneficiaries in the project submission phase (approvals, agreements) has been reduced, these being presented either at the contracting phase or at the payment phase.</li> </ul> </li> <li>• For this sub-measure the beneficiaries could apply on several NACE codes (for several types of activities).</li> <li>• Improvements have been made at procedural level, tailored to economic and social practice, such as extending the period for submission of certain documents.</li> <li>• Using the Extended Reference Pricing Database to assess the reasonableness of costs (the applicant no longer has to provide price offers if the goods are found in this database);</li> <li>• Obtaining the land book extract by the Agency instead of the applicant.</li> </ul>
<b>Contracting</b>	<ul style="list-style-type: none"> <li>• Beneficiaries can submit the technical project within 12 months compared to the 6 months period initially set.</li> <li>• Possibility to submit supporting documents at the contracting or even payment phase, providing more time for obtaining specific approvals.</li> </ul>
<b>Implementation</b>	<ul style="list-style-type: none"> <li>• Compared to the previous programming period when in the case of flat-rate measures beneficiaries were requested to submit invoices, payment documents and other supporting documents, in the current programming period, the beneficiaries must submit only the invoices for demonstrating the possession and payment of the purchased goods.</li> <li>• Notification of the beneficiary 6 months prior to the submission of the last payment installment, in order to identify possible problems leading to termination of the contracts and granting the Agency the support within the legislative limits to solve the problems.</li> </ul>

**Actions carried out in other member states / regions to reduce administrative burdens**

In Veneto, similar to Romania, investments must be made and / or held within the land assets owned by the company.

Related to simplification of procedures in the Veneto Region, the following were carried out:

- a) formatting the way of presenting the project, containing all the data and elements necessary for an objective evaluation of the criteria;
- b) eligibility and reimbursement of expenditure on the basis of detailed procedures to guarantee the reasonableness of costs and to reduce the chances of error both of the beneficiary and of the responsible authorities.

As to how the project is presented, the sections that potential beneficiaries have to detail include:

- Presentation of the project idea - including the description of the initiative and its originality support, strengths and vulnerabilities of the initiative; a brief description of how to carry out / finance the extra-agricultural activity granted for support; description of extra-agricultural products (including reference to agricultural and forestry activities and production)
- Presentation of human resources - describing the skills of the persons involved in the activity of the farm, highlighting the most relevant experience (graduated studies, working experience);
- Description of the clients and marketing strategy (detailing the client's typology targeted by the initiative, the average annual number of clients expected to be reached, the means and promotional channels to be used to attract customers);
- Expenditure planning (including breakdown of expenditure by activities and summary of goods as well as their necessity and functionality in the context of the project).

***Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored the programme implementation)***

By the end of June 2018, out of the 838 contracted projects during 2014-2020, only 22 were cancelled, which highlights the fact that there are no significant problems encountered in the implementation of the projects. Moreover, out of the 297 contracted projects coming from the transition over 67% have already been finalized.

No. of contracted projects	No. of finalized projects	No. of cancelled projects
829 9 – ITI Delta Dunării	142	22

***The analysis of selection criteria***

Selection criteria	Maximum score awarded at the level of each selection criteria
SC 1 The principle of diversification of agricultural activity of existing farms towards non-agricultural activities	- Maximum 20 points (session 2017) - Maximum 10 points (session 2016) - Maximum 30 points (session 2015)
SC 2 The principle of prioritisation of sectors with with growth potential in accordance with the National	- Maximum 35 points (session 2017)

Selection criteria	Maximum score awarded at the level of each selection criteria
Competitiveness Strategy for Sustainable Development of the Danube Delta SC 2 The principle of prioritization of sectors with growth potential (textiles and leather, creative and cultural industries - including crafts, information technology services, agro-tourism, services for the rural population)	- Maximum 25 points (session 2016)
SC 2 The principle of prioritization of sectors with growth potential (textiles and leather, creative and cultural industries - including crafts, information technology services, agro-tourism, etc.)	- Maximum 35 points (session 2015)
SC 3 The principle of stimulating tourist activities in the sense of prioritizing agrotourism activities in areas with high tourist potential / ecotourism destinations / areas with protected natural areas.	- Maximum 10 points (session 2017) - Maximum 20 points (session 2016) - Maximum 20 points (session 2015)
SC 4 The principle of carrying out previous activities as a general business management activity, in order to better manage the economic activity;	- Maximum 20 points (session 2017) - Maximum 30 points (session 2016) - Maximum 20 points (session 2015)
SC 5 The principle of locating the entire activity of the applicant in rural areas.	- Maximum 15 points (session 2017) - Maximum 15 points (session 2016) - Maximum 15 points (session 2015)

During the three finalized projects submission sessions, 5 selection principles were applied, the principle having the highest share, ie 35% of the total score awarded (under Calls 1 and 3), being the the principle of prioritization of sectors with growth potential in accordance with the National Competitiveness Strategy or the Integrated Strategy for Sustainable Development of the Danube Delta (call 3) or in the textile and leather sectors, creative and cultural industries - including crafts, information technology services, agro-tourism, etc (call 1).

With regards to the principle of diversification of agricultural activity of the existing farms towards non-agricultural activities, although it existed in all the project sessions, its scoring suffered considerable fluctuations depending on each call for projects, the criterion being scored with 10, 20 and 30 points respectively, depending on its relevance to each specific moment of launching the calls for proposals.

No specific problems have been identified with regards to the application and respect of the selection criteria on this sub-measure, the criteria being considered relevant from the perspective of the prioritization of the projects with an effective contribution to the achievement of the objectives of the strategy.

Compared to the situation in 2017, the possibility of introducing a new selection criterion related to the realization of investments for the production of biomass fuel for marketing was discussed (the modification being found in the VIth version of the NRDP); the selection criterion has been introduced both at national

level and for the ITI Danube Delta area. The analysis of the efficiency of maintaining this criteria is recommended for the next programming period in order to obtain a better understanding of its applicability and relevance in the selection process.

**Proposals for the reduction of the administrative burden**

Phase	Proposals for the reduction of the administrative burden	Expected effects
<p><b>Submission</b></p>	<ul style="list-style-type: none"> <li>It would be useful to create synergies with Measure 2 of the NRDP 2014-2020 so that beneficiaries receive counseling services in order to support them to successfully develop their business ideas.</li> </ul>	<p>At the level of beneficiaries, the implementation of such a measure could have an impact on the accessibility of the sub-measure. For the beneficiaries of this sub-measure it is considered appropriate to receive consultancy and counselling for the successful implementation of their own ideas and projects.</p>
	<ul style="list-style-type: none"> <li>The possibility to discuss, on the basis of protocols with the Ministry of Environment and NSVFSA, to facilitate the process of obtaining opinions.</li> </ul>	<p>This measure would simplify the submission phase of the projects, meaning that a shorter period would be required for the beneficiaries to obtain the approvals/opinions necessary for the submission of projects.</p>
	<ul style="list-style-type: none"> <li>Ar fi utilă o mai clară definiție a activității meșteșugărești dacă se dorește menținerea punctării suplimentare în următoarea perioadă de programare.</li> </ul>	<p>Definiția activității meșteșugărești nu este bine reglementată la nivel național (Legea privind activitățile meșteșugărești), acest aspect fiind demonstrat printr-o simplă adresă de la primărie în baza căreia se menționează că solicitantul este meșteșugar. O mai bună reglementare a acestui concept ar facilita modalitatea de acordare a punctajului în mod transparent pentru toate proiectele care vizează astfel de activități.</p>
	<ul style="list-style-type: none"> <li>The condition regarding the location of the holding in the territorial administrative unit (TAU) where the investment is to be made could be transposed into „the location of the holding in the territorial administrative unit where the investment is to be made or in an adjacent area but not more than 50 km from it”.</li> </ul>	<p>The proposed measure would reduce administrative boundaries in the sense that it would allow beneficiaries located at the boundaries of a TAU to also operate in a neighboring TAU provided that they continue to contribute to achieving the objectives set out in respect of this requirement (for example, customers must have the opportunity to get involved in the activities of the agropension and to be served with products produced at its level).</p>
	<ul style="list-style-type: none"> <li>Requesting certain approvals (eg on electricity, water and</li> </ul>	<p>The proposed measure would simplify, on the one hand, the effort of applicants to obtain those approvals at the</p>

Phase	Proposals for the reduction of the administrative burden	Expected effects
	gas) at the start of the investment rather than at the time of submitting the financing request.	time of projects submission, as well as the effort of the managing authorities to verify the respective approvals only for a smaller number of projects, those selected rather than the ones submitted.

## sM 6.5 The scheme for small farmers

### Overview of submeasure

<b>Objective</b>	<ul style="list-style-type: none"> <li>The transfers of property rights, the voluntary transfer of land from farmers to farmers and the long-term disposal of the right to use (eg. lease), with the purpose of facilitating land / farm joining and, therefore, alongside other measures, to restructuring farms and reducing the fragmentation of agricultural holdings.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>Farmers whose holdings meet the small farm definition under the simplified scheme in Pillar 1 and have applied this scheme for at least one year according to Title V of R (EU) No. 1307/2013.</li> </ul>
<b>Eligible activities</b>	Final transfer of the holding (at least the lands/land and animals covered by the simplified scheme for small farmers in Pillar I).
<b>Procedural flow</b>	<p>Application:</p> <ul style="list-style-type: none"> <li>Filling in the application form in accordance with the standard model;</li> <li>On-line submission of the financing file including the application form and the annexed documents (according to the list foreseen in the Applicant's Guideline).</li> </ul> <p>Selection/Contracting:</p> <ul style="list-style-type: none"> <li>Verification of the eligibility of the application form;</li> <li>Verification of the selection criteria;</li> <li>Selection of projects;</li> <li>Contracting the non-reimbursable support (the object of the financing contract is to grant non-reimbursable financing by AFRI for the implementation of the financing application. AFRI re-evaluates eligibility conditions and selection criteria for contracting).</li> </ul> <p>Implementation:</p> <ul style="list-style-type: none"> <li>The application file is submitted by the applicant to COFRI annually, for a period of maximum 5 years.</li> </ul> <p>Monitoring/Sustainability:</p> <ul style="list-style-type: none"> <li>Monitoring for a period of 5 years starting from the signing of the financing contract.</li> </ul>



### The analysis of the implementation flow

The procedural flow of submeasure 6.5 is in line with the normal implementation process of the NRDP 2014-2020, however, there were 2 calls for proposals, which resulted in 3 contracted projects and a rejection percentage of applications of 80% (due to non-compliance).

In the first phase of the application, the application file is requested, containing the application form and its related annexes, including: 1. documents attesting the applicant's ownership on the land (which was supported by the Simplified Scheme in Pillar I) transferred / to be transferred; 2. Supporting documents justifying that the applicant takes the commitment to permanently transfer the land. The eligibility conditions are the main impediment and generate major difficulties among beneficiaries, mainly because the land for which the applicant under sM 6.5 owns the right of use and for which he received the Pillar I support could not be purchased in all cases from the leaseholder, which is why the applicant could not transfer the entire holding which was supported by Pillar I.

Subsequently, the existence of all the requested documents within the financing application, the eligibility criteria of the applicant and agricultural holding, the eligibility criteria of the financing application and annexed documents are verified, resulting in an ineligible or eligible financing application. Next, the selection criteria are verified in order to check if the minimum monthly quality threshold is met - if the application form has a score lower than the monthly / minimum threshold, then it becomes non-compliant. The selection of eligible projects is made in the descending order of the selection score within the allocation available for the monthly selection representing the difference between the annual allocation and the total public value of projects selected through the previous monthly selection / appeal reports.

In order to sign the financing contract, AFRI notifies the beneficiary about the selection of the application form in order to submit the required documents for contracting (similar to those of the application stage) within maximum 30 days calculated from the date of notification receipt. Thus, AFRI re-examines the eligibility conditions and selection criteria for contracting. The contract is concluded for a period up to 31.12.2020, while the contract monitoring period is of 5 years, calculated from the date of the last payment.

### Additional requirements (not deriving from European or national legislation) and potential effects

<i>Additional requirement</i>	<i>Intensity of the requirement upon the applicant/beneficiary</i>	<i>Intensity of the requirement upon authorities responsible with the implementation of the sM</i>	<i>Degree of complexity of the requirement</i>
The farmer is not allowed to permanently transfer the holding earlier than the date of issuance by APIA of the payment decision for the respective campaign, in the context in which the holding has to have been the object of support	Obligation for the farmer to wait for the payment decision to be issued by APIA in order to be able to transfer the holding in order to become eligible in the sM 6.5.	NA	

<i>Additional requirement</i>	<i>Intensity of the requirement upon the applicant/beneficiary</i>	<i>Intensity of the requirement upon authorities responsible with the implementation of the SM</i>	<i>Degree of complexity of the requirement</i>
through the Scheme for Small Farmers in Pillar I.			
Reverification of the eligibility conditions and selection criteria. Double verification of the documents regarding the transfer of the holding (when submitting the application form and signing the financing contract).	NA	Additional administrative burden	

Overall, no additional requirements to European and national norms have been identified at the level of SM 6.5. However, it is imperative that the farmer is not allowed to permanently transfer the holding earlier than the date when the payment decision for the respective campaign is issued by APIA, which is a condition of restriction if it is not desired to obtain a double financing from the beneficiary.

The verification of eligibility conditions and of the selection criteria, including of supporting documents through which the applicant undertakes to transfer the land permanently, is done twice, both at the time of submitting the application and at the time of signing the financing contract (the context is justified since the applicant may change the recipient of the holding and, implicitly, the score obtained based on the selection criteria, but these aspects can be prevented for example through a purchase contract with a term of execution, thus avoiding double checking).

#### **Actions implemented in order to reduce the administrative burden**

There was no need for further simplification actions, given the low level of complexity of the sub-measure. In the case of submeasure 6.5 no simplifications can be made as it fully complies with the provisions of R1305 / 2013 and of the NRDP 2014-2020 - the conditions are that the beneficiary to have accessed in 2015 the „Simplified Scheme for Small Farmers in Pillar I” and to have received support from APIA for 2015, to own the land for which it received support from APIA and which will be given to another farmer registered within IACS.

#### **Actions made at the level of other EU member states/regions in order to reduce administrative burden**

None of the selected regions nor Ireland have applied this specific submeasure.

**Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

No. of contracted projects	No. of finalised projects	No. of cancelled projects
3	0	0

So far, three financing contracts have been signed under this sub-measure, each with an average value of 400 euro / year, most of the application forms submitted under this sub-measure being declared ineligible (roughly 80% of them were rejected).

Submeasure 6.5 shows a low accessing degree due to the short support period (until 2020) and the low value of the support, namely 120% of the amount collected to APIA on the „Simplified scheme for small farmers in Pillar I”, which makes it unattractive. In addition, the low accessing rate is also due to the ownership obligation of the land covered by the APIA support - in order to benefit from the simplified scheme in Pillar I, the beneficiary must prove the use of the land, regardless if the beneficiary owns the land / is a leaseholder / concessionaire; instead, for the access to submeasure 6.5 it is mandatory for the applicant to own the land in order to be able to make the transfer. At the same time, 2015 is the only year in which applicants could access the „Simplified Scheme for Small Farmers in Pillar I” at APIA, and from 2016 onwards only their heirs could access the Pillar I scheme.

**Analysis of the selection criteria**

Selection criteria	Maximum score awarded at the level of each selection criteria
SC 1 The transferred farm size principle, through the prioritisation of the smallest holdings	- Maximum 30 points (session 2016) - Maximum 30 points (session 2017)
SC 2 The principle of farm merging	- Maximum 60 points (session 2016) - Maximum 60 points (session 2017)
SC 3 The principle of the agricultural potential of the area targeting the areas with potential determined on the basis of specialized studies	- Maximum 5 points (session 2016) - Maximum 5 points (session 2017)
SC 4 The principle of real property right	- Maximum 5 points (session 2016) - Maximum 5 points (session 2017)

Given the specificity of the submeasure, the selection criteria have been proposed so as to achieve the planned objective. Consequently, the selection criterion with the highest weight is represented by the principle of merging the holdings (maximum 60 points). However, out of the three beneficiaries of the submeasure, only one achieved a score of 20 points (the rest obtained 0 points).



**Proposals for reducing administrative burden**

Access by registered IACS farmers that own registered land, increase the period for support, allocation of fixed amounts per hectare which is not conditional on a payment made to APIA and a target year for accessing schemes in the Pillar I, in order to eliminate dependence on another entity.

**sM 7.2. Investments in creating and modernising basic small scale infrastructure**

**Overview of the submeasure**

<b>Objective</b>	<ul style="list-style-type: none"> <li>• Creating road infrastructure of local interest and improved water / wastewater infrastructure that will contribute to diminishing the social and economic decline tendencies and to improving living standards in rural areas.</li> <li>• Improving living conditions for rural population and mitigating the depopulation phenomenon in rural areas by reducing rural-urban disparities.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>➢ Villages and their associations</li> <li>➢ NGOs (for investments in educational and social infrastructure - kindergartens, nurseries and after-school infrastructure)</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>• Construction, extension and / or modernization of public water network in rural localities that are part of human agglomerations between 2.000 – 10.000 equivalent inhabitants (e.i.)</li> <li>• Construction, extension and / or modernization of the public waste water network in rural localities that are part of human agglomerations between 2.000 – 10.000 e.i.</li> <li>• Construction, extension and/or upgrading of roads network of local interest</li> <li>• Establishing and modernisation (including endowment) of kindergartens, except for those not located within rural schools, including demolition, where technical expertise recommends it</li> <li>• Extension and modernization (including endowment) of higher secondary education institutions, of schools in the technological line with a natural resources profile and environment protection and professional schools in agriculture</li> <li>• Establishment and modernisation (including endowment) of nurseries and after-school infrastructure, only those not located in rural schools, including demolition, where technical expertise recommends it.</li> </ul>
<b>Procedural flow</b>	<ul style="list-style-type: none"> <li>• Filling in the application form along with the technical and administrative annexes, scanning the application file and uploading it to the online platform;</li> <li>• Framing the application form depending on the self-assessment score (score higher than or equal to the monthly quality threshold in which the application was submitted)</li> <li>• Checking the eligibility and the project indicative budget (RCFRI for all the investment projects, AFRI for projects included in the sampling) and requesting additional information</li> </ul>

	<ul style="list-style-type: none"> <li>• Checking the application form on the ground in order to ensure the correct fit in the eligibility and selection criteria (RCFRI - for all the financing applications, AFRI - for projects included in the sample)</li> <li>• Verification of the selection criteria, project selection (including breakdown of projects according to the number of inhabitants served by the investment - for the water / waste water infrastructure component, the length of the road made through the project - for the road infrastructure component and the construction capacity - for the infrastructure component), submission and analysis of complaints</li> <li>• Approval and publication of the Selection Report</li> <li>• Submitting the financing application on paper (RCFRE)</li> <li>• Signing the financing contract</li> <li>• Request for advanced payment (up to 50% of the eligible non-reimbursable amount)</li> <li>• Submitting payment requests and making payments</li> <li>• Submitting the procurement programmes related to projects and the procurement files for verification (RCFRE)</li> <li>• Checking the eligibility and selection criteria throughout the duration of the contract.</li> </ul>
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### **Analysis of the implementation flow of the submeasure**

The implementation flow of submeasure 7.2 favored the submission of a large number of projects, the submeasure also presenting a territorial feature, with distinct allocations available for the ITI Danube Delta and the mountain area. Analyzing the distribution of funding applications submitted during the three sessions (24th of September – 18th of December 2015, 25th of May – 31st of October 2016 and 28th of March – 20th of June 2017), there was a high interest for all the promoted operations.

### **Additional requirements (not deriving from European and national legislation) and potential effects**

<b>Additional requirement</b>	<b>Intensity of the requirement upon the applicant</b>	<b>Intensity of the requirement upon the relevant authorities</b>	<b>Degree of complexity of the requirement</b>
In the case of the water / waste water infrastructure component, agglomerations of less than 2,000 equivalent inhabitants are not supported. The funding managed through NRDP focuses on agglomerations between 2,000 and 10,000 equivalent inhabitants, projects funded through the Large Infrastructure Operational Programme aim at	This is not an element of over-regulation per se, but rather restricts the access of localities under 2000 equivalent inhabitants (small localities most exposed to risks and vulnerabilities) to sources of financing and development. Taking into account the specificity of these agglomerations of less than 2000 equivalent inhabitants, which are in essence rural, it is considered that their non-inclusion in the NRDP funding area will lead to		



investing in localities with more than 10,000 equivalent inhabitants and the areas with up to 2,000 equivalent inhabitants are supported only by the state budget which, being limited, leaves in a vulnerable situation a type of administrative unit.	increased economic disparities and to a widening of the development gap between them and the rest of the rural territory.	
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**Actions implemented in order to reduce administrative burden**

Phase	Actions implemented
<b>Application</b>	Eliminating the obligation to submit together with the financing application the document certifying that the applicant has submitted the documentation to the National Environmental Protection Agency (NEPA) / the decision of the initial evaluation / decision of the framing stage / environmental approval. The NEPA opinion was requested in the most recent session at the contracting stage, taking into account the difficulties reported by beneficiaries regarding the time to obtain this document.
<b>Selection</b>	NA
<b>Implementation</b>	NA
<b>Monitoring</b>	NA

**Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

Based on the information available by the end of June 2018, the following were contracted:

- on the water/wastewater infrastructure component - 304 projects out of a total of 511 applications submitted, representing a financing rate of 59%;
- on the road infrastructure component – 491 out of a total of 1003 applications submitted, representing a financing rate of 48%;
- on the educational and social Infrastructure component - 316 out of a total of 452, representing a financing rate of 69%.

With regards to the road infrastructure component, 99% of the contracted projects were still under implementation at the end of June 2018, while for the other components the percentage of projects underway was 100%. None of the funded contracts was reported as cancelled, which leads to an increased success rate of the implementation process for the contracts signed under this sub-measure.

No. of submitted application forms	No. of selected application forms	No. of contracted projects	No. of finalized projects	No. of cancelled projects
Water/wastewater infrastructure – 501	335	301 ITI Danube Delta - 4	0	0



ITI Danube Delta - 10	ITI Danube Delta - 9		ITI Danube Delta - 0	ITI Danube Delta - 0
Road infrastructure – 976	489	475	4	0
ITI Danube Delta - 27	ITI Danube Delta - 26	ITI Danube Delta - 16	ITI Danube Delta - 0	ITI Danube Delta - 0
Educational and Social Infrastructure – 444	325	310	0	0
ITI Danube Delta - 8	ITI Danube Delta - 6	ITI Danube Delta - 6	ITI Danube Delta - 0	ITI Danube Delta - 0

### Analysis of selection criteria

The selection criteria set for the components of submeasure 7.2 are presented below:

Selection Criteria - Water / Wastewater Infrastructure	Maximum score awarded
SC 1 The principle of prioritizing the type of investment in the sense of prioritizing the investments in water/wastewater infrastructure	Maximum 20 points (sessions 2015, 2016, 2017)
SC 2 The principle of covering the population served	Maximum 60 points (sessions 2015, 2016, 2017)
SC 3 The principle of prioritizing investments complementing those financed under the Sectorial Operational Programme Environment and / or the Large Infrastructure Operational Programme	Maximum 20 points (sessions 2015, 2016, 2017)

Selection criteria – Road infrastructure	Maximum score awarded
SC 1 The principle of prioritizing the type of investment in the sense of prioritizing investments in water / waste water infrastructure	10 points (sessions 2015, 2016, 2017)
SC 2 The principle of the degree of covering the population served	Maximum 40 points (sessions 2015, 2016, 2017)
SC 3 The principle of connectivity in order to ensure the connection with main roads and other means of transport	Maximum 20 points (sessions 2015, 2016, 2017)
SC 4 The principle of the multiple role in the sense of increasing accessibility for economic agents, for tourist areas, for social investments, and for other investments financed through European funds	Maximum 30 points (sessions 2015, 2016, 2017)

Selection Criteria - Educational / Social Infrastructure	Maximum score awarded
SC 1 The principle of prioritizing the type of investment in	10 points (sessions 2015, 2016, 2017)

Selection Criteria - Educational / Social Infrastructure	Maximum score awarded
the sense of prioritizing investments in water / waste water infrastructure	
SC 2 The principle of the degree of covering the population served	Maximum 40 points (sessions 2015, 2016, 2017)
SC 3 The principle of prioritizing the type of investment according to the socio-economic development degree of the area, according to the study on establishing the socio-economic development potential of rural areas	Maximum 50 points (sessions 2015, 2016, 2017)

During the three completed submission sessions, 3 selection principles were applied for the water / wastewater infrastructure component, 4 selection principles for the road infrastructure component and 3 selection principles for the educational / social infrastructure component, for the latter two components the maximum score being 90 points. The selection criteria and their score did not change during the three calls for proposals launched under this sub-measure. At the same time, no specific problems have been identified regarding the application and fulfillment of the selection criteria on this sub-measure, which are considered relevant from the perspective of the projects hierarchy with an effective contribution to the achievement of the strategy objectives.

#### Proposals to reduce the administrative burden

Phase	Proposals to reduce the administrative burden	Expected outcomes
<b>Application</b>	According to the Applicant's Guide, the documents necessary to prepare the financing application include a notification regarding the project's compliance with hygiene and public health conditions, namely the notification that the investment is not subject to hygiene and public health assessment. In case of investments not subject to the evaluation of territorial structures of the National Sanitary Veterinary and Food Safety Authority, the request for a denial issued by this Authority could be removed.	Eliminating the need to present the denials issued by the relevant public authorities could ease the administrative effort made by applicants when submitting the financing applications.
<b>Selection</b>	NA	NA
<b>Implementation</b>	NA	NA
<b>Monitoring</b>	NA	NA

**SM 7.6 Investments in creating and developing non-agricultural activities**

**Overview of the submeasure**

<p><b>Objective</b></p>	<ul style="list-style-type: none"> <li>Supporting investments for the restoration, preservation and accessibility of the cultural heritage of local interest, of the monastic settlements, including the cultural settlements;</li> <li>Harnessing local cultural heritage, promoting rural tourism, thus leading to higher living standards in rural areas;</li> <li>Sustainable local development.</li> </ul>
<p><b>Eligible beneficiaries</b></p>	<ul style="list-style-type: none"> <li>NGOs in accordance with the legislation in force;</li> <li>Religious units in accordance with the legislation in force;</li> <li>Authorized natural persons / commercial companies owning Class B public cultural heritage objectives;</li> <li>Villages in accordance with the legislation in force.</li> </ul>
<p><b>Eligible activities</b></p>	<p>Non-reimbursable funds will be granted to eligible beneficiaries for tangible and / or intangible investments according to the following indicative list of eligible expenses:</p> <ul style="list-style-type: none"> <li>restoration, preservation and endowment of buildings / monuments from the cultural heritage of local interest of class (group) B;</li> <li>restoration, preservation and / or endowment of class (group) B monasteries and the construction, extension and / or modernization of access roads to monasteries of class (group) B;</li> <li>modernization, renovation and / or endowment of cultural homes;</li> <li>purchasing or developing software and acquiring patents, licenses, copyrights, trademarks</li> </ul>
<p><b>Procedural flow</b></p>	<p>Application stage:</p> <ul style="list-style-type: none"> <li>Online submission of the Application Form and its related annexes (prior registration of applicants on the AFRI website);</li> </ul> <p>Evaluation and selection stage:</p> <ul style="list-style-type: none"> <li>Framing the application form based on the prescoring: the financing application is admitted for being checked against the eligibility and selection criteria if the applicant's score is higher than or equal to the monthly quality threshold under which the financing application was submitted;</li> <li>Verification of technical and financial eligibility consists of: checking the applicant's eligibility; checking the investment's eligibility; checking the financing application's indicative budget. AFRI may request additional information through the evaluation experts;</li> <li>AFRI / CRFRI performs on-the-spot checks to control the compliance of data and information contained in the technical and administrative annexes of the financing application with the elements existing on the proposed site. The expert compares eligibility criteria based on the documents (administrative check) with the real situation in order to ensure that the financing application was correctly framed within the eligibility criteria.</li> </ul>

	<ul style="list-style-type: none"><li>• Verification of selection criteria: following these checks, there may be three situations: the project is ineligible; the project is eligible and will score <math>\geq</math> the monthly quality threshold; the project is non-compliant.</li><li>• Selection of eligible projects is done in the descending order of selection score, within the allocation available for the monthly selection. A Selection Report will be published and applicants may file online complaints to be resolved by AFRI.</li></ul> <p>Contracting stage:</p> <ul style="list-style-type: none"><li>• Submitting the necessary documents for the signing of the financing contract;</li><li>• Signing the financing contract.</li></ul> <p>Implementation stage:</p> <ul style="list-style-type: none"><li>• The beneficiary will submit to CRFRI the payment requests file in accordance with the reschedule statement of payment requests files submitted when the financing contract was signed.</li></ul> <p>Monitoring stage:</p> <ul style="list-style-type: none"><li>• Verification of the fulfillment of conditions assumed by the beneficiary: the beneficiary will have to respect throughout the contract, the eligibility conditions and selection criteria included in the financing application approved as a result of the evaluation and selection process.</li></ul>
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### **Analysis of the implementation flow of the submeasure**

Sub-measure 7.6 implied an implementation flow that favored the submission of a large number of projects, with a high degree of attractiveness for potential beneficiaries. Submeasure 7.6 also presents a territorial feature, with a distinct allocation for the mountain area and the launch of distinct sessions for ITI Danube Delta, which generally enjoyed real success, with no major implementation problems.

The NRDP supports local development in rural areas and mountain areas by implementing submeasure 7.6, which promotes investments in the creation and upgrading of small-scale cultural infrastructures and heritage.

With regard to submeasure 7.6, it is noted that it is of significant interest to the types of operations promoted by beneficiaries, mainly represented by public institutions willing to improve the attractiveness of their territories. During the programming phase, representatives of territorial administrative units and NGOs were involved in the preparation of measure by organizing the thematic working groups to take into account specific needs. At the same time, potential beneficiaries were informed about funding opportunities through the programme's website, through county meetings and events organized in the territory with the participation of the Ministry of Agriculture's representatives.

In addition to the changes to public procurement legislation that have greatly influenced the implementation of NRDP, other difficulties have been encountered related to the timing between the selection and submission phases, which is considered to be too long.

Among the difficulties encountered in the implementation phase of submeasure 7.6 the following were identified: the time interval between the selection and contracting phase; changes to the legislation on public



procurement, with an increased impact in the contracting phase. Projects carried out on the infrastructure component require a long implementation period, aspect also remarked based on the experience of the previous NRDP.

In case of submeasure 7.6, there is a different support rate depending on the type of beneficiary - the starting point was constituted following the discussions between the European Commission and MA NRDP. However, this provision was included in 2016 (before the second session was opened), but not at the first project submission session. Related to beneficiaries (especially the private ones), they have developed projects on certain budgets, having prepared them before this change. This change has had a particular impact on NGOs, which have been affected more. What needs to be emphasized is that this change occurred before the start of the session, after that time the guide, the verification sheets with procedures and the funding application remained unchanged in order to ensure a coherent climate of access.

Under this submeasure, non-reimbursable support is granted depending on the category of beneficiaries: 100% of the total eligible expenditure for villages and 80% of the total eligible expenditure for other types of beneficiaries, without exceeding the set thresholds. This differentiation was requested by the Commission, but it may have been more appropriate to unitarily grant the support, regardless of the category of beneficiaries. It was considered that mainly heritage assets renovated by city halls generate lower incomes.

The implementation flow of the submeasure is generally fluidized, involving several public institutions (MA, AFRI) and involving recurring measures to simplify administrative procedures in order to facilitate the submission and implementation of projects on the one hand, and their effective control and monitoring by the institutions responsible for managing the submeasure, on the other hand.

**Additional requirements (which do not derive from European and national legislation) and potential effects**

<i>Additional requirement</i>	<i>Intensity of the requirement upon the applicant</i>	<i>Intensity of the requirement upon the relevant authorities</i>	<i>Degree of complexity of the requirement</i>
The classification of tourist areas in Romania has led to a concentration of investments towards regions which show more dynamism and better capacity in terms of tourism development.	The new classification has directly affected the potential beneficiaries interested in accessing the submeasure, which were located in areas that were no longer considered touristical and could no longer be supported. This requirement generates deeper cleavage between economically advanced and less developed regions.	N.A.	

**Actions implemented to reduce administrative burden**

Phase	Actions implemented
Application	N.A.
Contracting	N.A.
Implementation	<ul style="list-style-type: none"> <li>removal of progress reports (these were required within the payment procedures for all measures);</li> <li>eliminating the request for submitting interim delivery minutes prior to the delivery minute for the commissioning of machines (in the specific authorization payment procedure for investment measures all the delivery and receiving documents were requested).</li> </ul>

**Actions implemented by other EU member states/regions in order to reduce administrative burden**

In the Veneto region operations are eligible if:

- they are identified through specific studies and defined through a regional law;
- do not compromise the architectural image and historical structure of buildings and are executed by respecting the construction, architectural, historical and landscape features that represents them as determined by the architect.

**Analysis of the current status of contracted projects by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

On the basis of the available information by the end of June 2018, 565 projects out of the 926 submitted under the submeasure were contracted. More than 97% of the projects contracted under submeasure 7.6 were still under implementation at the end of June 2018 and only 2 of the contracted projects were canceled, leading to an increased success rate for the implementation of contracts signed within this measure.

No. of contracted projects	No. of finalized projects	No. of canceled projects
537 9 – ITI Danube Delta	11	2

**Analysis of the selection criteria**

The selection criteria set for the components of submeasure 7.6 are presented below.





<b>Selection Criteria - For investments to restore and conserve cultural heritage of local interest, class (group) B</b>	<b>Maximum score awarded at the level of each selection criteria</b>
SC 1 The principle of touristic potential in the sense of prioritizing projects in rural localities with touristic development potential	<ul style="list-style-type: none"> <li>- Maximum 70 points (session 2017)</li> <li>- Maximum 70 points (session 2016)</li> <li>- Maximum 70 points (session 2015)</li> </ul>
SC 2 The principle of cultural value according to the number of socio-cultural activities carried out	<ul style="list-style-type: none"> <li>- Maximum 30 points (session 2017)</li> <li>- Maximum 30 points (session 2016)</li> <li>- Maximum 30 points (session 2015)</li> </ul>

<b>Selection Criteria - For modernization and endowment investments in cultural homes</b>	<b>Maximum score awarded at the level of each selection criteria</b>
SC 1 The principle of serving the population, including the touristic potential of the rural locality Projects serving communities with the highest number of inhabitants Projects in areas with high touristic potential	<ul style="list-style-type: none"> <li>- Maximum 80 points (session 2017)</li> <li>- Maximum 80 points (session 2016)</li> <li>- Maximum 80 points (session 2015)</li> </ul>
SC 2 The principle of cultural value according to the number of socio-cultural activities carried out	<ul style="list-style-type: none"> <li>- Maximum 20 points (session 2017)</li> <li>- Maximum 20 points (session 2016)</li> <li>- Maximum 20 points (session 2015)</li> </ul>

During the three call sessions, 2 selection principles were applied, the principle which benefited from the highest share in case of investments for restoration and conservation of cultural heritage of local interest, class (group B), respectively 70% of the total score awarded, being the principle of touristic potential, in the sense of prioritizing the projects in the rural localities with touristic development potential. The selection criteria and their score did not change during the three call sessions launched under this submeasure.

As for the principle which benefited from the highest weight in the case of investments in modernization and endowment of cultural homes, namely 80% of the total score, this was the principle related to the degree of service offered to the population, including the touristic potential of rural locality. The selection criteria and their score did not change during the three call sessions launched under this submeasure.

No specific problems have been identified regarding the application and observance of the selection criteria on this submeasure, the criteria being considered relevant from the perspective of project hierarchy with an effective contribution to the achievement of the strategy objectives.

**Proposals to reduce administrative burden**

Phase	Proposals to reduce the administrative burden	Expected effects
Defining the submeasure	Consider the possibility to periodically update the analyses of the touristic potential of areas in Romania, including from the perspective of local activities and the participation of key local actors in the tourism sector.	The proposal envisages the periodic updating of needs and analyses carried out on the touristic potential, which would allow certain areas with important touristic features to have access to the support provided through NRDP.
	Creating distinct allocations for rural touristic areas and mountain touristic areas	Based on a differentiated allocation between rural areas and mountainous areas with tourism potential, the principle of equal opportunities and fair distribution of funds allocated to this submeasure for the two categories of areas is ensured.
	A unitary approach to granting of support, regardless of the category of beneficiaries.	The existence of a single support intensity for all categories of eligible beneficiaries would avoid distorting competition between different types of stakeholders, which would lead to the selection of those projects with the greatest impact at local level, regardless of the beneficiary organization (TAU, NGOs, religious units, etc.).

**sM 8.1 Afforestation and creation of woodland**

**Overview of the submeasure**

<b>Objective</b>	Establishment of forest plantations, respectively: <ul style="list-style-type: none"> <li>• Forest bodies on agricultural and non-agricultural land,</li> <li>• Forest protection curtains on agricultural and non-agricultural land.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>• Public and private owners of agricultural and non-agricultural land and their associative forms. <ul style="list-style-type: none"> <li>➢ Public holders: LAU 2 territorial administrative units (villages, cities, municipalities) and other public legal entities governed by law, as well as their associative forms.</li> <li>➢ Private owners: natural persons, authorized natural persons, individual enterprises, family enterprises, commercial companies, associations and foundations, other private legal entities defined by law, as well as their associative forms.</li> </ul> </li> </ul>

<p><b>Eligible activities</b></p>	<ul style="list-style-type: none"> <li>Planting works for the three types of landform (plain, hill, mountain) and the two categories of land (agricultural, non-agricultural);</li> <li>Enclosure of the forest plantation;</li> <li>Maintenance of the planting for the three types of landform;</li> <li>Tree care works;</li> <li>Compensation to cover agricultural income losses as a result of afforestation of agricultural land;</li> <li>Restoration of the plantation in the event of an occurrence of biotic or abiotic factors (until the second maintenance work of the plantation during the first year of afforestation);</li> <li>Plantation maintenance work for the 1st or 2nd year for the planted area not affected by an event generated by biotic or abiotic factors, in case of plantation restoration following the occurrence of such an event until the second plantation maintenance work.</li> </ul>
<p><b>Procedural Flow</b></p>	<p>Pre-application stage:</p> <ul style="list-style-type: none"> <li>Submitting the Request for the issuing of Ascertainment Notice (at CC APIA);</li> <li>Identification of surfaces in the IPA Online system (digitization of parcels through the GIS application);</li> <li>Performing field measurements (carried out by CC APIA);</li> <li>Issuing the Ascertainment Notice (by CC APIA);</li> <li>Request for the Forest Guards Notice to verify the inclusion / non-inclusion of the land in the improvement area and in the National program for the establishment of forest curtains for the protection of motorways and national roads;</li> <li>Drafting the technical project and its submission (and accompanying documents) in order for the opinion and the summary fiche of the afforestation technical project to be issued (issued by the Forest Guard).</li> </ul> <p>Application stage:</p> <ul style="list-style-type: none"> <li>Filling in and submitting the financing application file (online and personal to CC APIA);</li> <li>Checking the compliance of the financing application (carried out by CC APIA in the applicant's presence) and issuing the delivery-receiving document for the visual control of the financing request.</li> </ul> <p>Evaluation stage:</p> <ul style="list-style-type: none"> <li>Verifying the compliance and correctness of data submitted and drafting the Preliminary Selection Report (carried out by CC APIA);</li> <li>Submission of complaints regarding the eligibility and the amount of support within a maximum of 10 working days from the publication of the Preliminary Selection Report (at CC APIA).</li> </ul> <p><i>Modification of support requests</i> (in cases of legislative changes regarding conditions of accessing the state aid scheme):</p> <ul style="list-style-type: none"> <li>Issuing of the Notification regarding the preliminary selection results and modification of the financing application (APIA) and the submission of Statement regarding the modification of the financing application (drafting the technical</li> </ul>

afforestation project and / or the request for care works) within 2 days from the notification receipt;

- Completing the afforestation technical project, submit the completions and request of the Supplementary Notice (submitted to the Forest Guard);
- Submitting the Supplementary Notice, the new Summary Form and Request for Modifying the financing application (CC APIA).

Selection stage:

- Awarding of scores according to par. (7) Art. 6 of the Regulation for Organization and Operation of the Selection Process and of the Appealing Verification Process approved through OMADR no. 840 / 07.05.2018 (APIA - within maximum 25 working days after the end of the session) – in cases where the total public value of the support requests submitted is higher than the value of the allocation for the session;
- Publication of the Revised Preliminary Selection Report and notification of eligible / non-eligible beneficiaries (APIA);
- Submission of appeals (to CC APIA), undergoing their resolution and the publication of the partial (after its verification by the methodology department with the support of the specialised service responsible for the submeasure within AM NRDP) and of final selection report (APIA);
- Submitting the Environmental Agreement and Natura 2000 Notice - within 3 months from the applicant's notification regarding the selection of the request for support, if it is not necessary to go through the environmental impact assessment procedures, respectively within 6 months if these procedures are required (APIA).

Signing of the commitment:

- Presenting the identity card, land use documents (beneficiaries who are not owners of the land for afforestation), self-declaration regarding the waiver of any other form of support during the commitment period and the document issued by the environmental protection authorities (CC APIA);
- Signing of the commitment (CC APIA).

Implementing the commitment

- Performing on-the-spot verifications of the planting, fencing, maintenance and care of the plantation (FG) and verification of the plantation maintenance and compliance with eco-conditionalities (APIA, respectively AFRI – overcontrol);
- Submitting payment files related to Premium 1 (technical project, planting and works for fencing of the plantation), respectively the annual submission of payment files related to Premium 2 (maintenance work - up to 6 years, care - for maximum 2 years and compensations for the loss of agricultural income - for maximum of 12 years) in two copies on paper (CC APIA) and online through IPA;
- Carrying out administrative and on-site inspections for the works carried out and for the verification of compliance with the conditions stipulated in the commitment (Forest Guard / APIA);
- Payment to the beneficiary.



### Analysis of the implementation flow

Submeasure 8.1 has required a different implementation flow for the Payment and Agricultural Intervention Agency, implying - unlike the procedures specific to the voluntary payment commitments for agricultural lands – the submission of projects and technical files that go through the selection, evaluation and scoring stages (identical to those applied to the sub-measures managed by the Agency for Financing Rural Investments). For this reason, it took some time to develop the applicant's guide, the implementation manual and IT system for the management of the submitted projects (at FG) and of the requests for support. This state of affairs has had an impact on the time during which potential beneficiaries could consult the implementation documents prior to the application submission session and where they could begin the process of preparing the documents needed to submit the request for support<sup>6</sup>.

With regards to the procedural flow<sup>7</sup>, it involves several institutions, including the Ministry of Waters and Forests through the Forest Guard, a joint agreement on the delegation of responsibilities between AFRI, APIA and the Ministry of Waters and Forests - General Directorate of Forests (MAP-DGP) being made. In this respect, applicants must undertake a series of preliminary steps to submitting a request for support including the identification / registration of the agricultural / non-agricultural land to be forested within the IPA online system of APIA, obtaining the Ascertainment Note from APIA, as well as submitting for approval the technical afforestation project to the Forest Guard. This process has the role of ensuring the correct location of the project, representing a control key for both beneficiaries and APIA.

However, the submission of technical documentation to different institutions leads to an additional administrative effort for potential beneficiaries, all the more so since the effective submission period at the first session was initially set at 2 months (21st of November 2016 – 20th of January 2017), then prolonged for another 2 months. Moreover, in the preliminary stage, difficulties were encountered in the identification of the afforestation areas in the IPA online system, in the establishment of the agricultural and non-agricultural land category within the meaning of the technical file (the definition of non-agricultural land being different at the level of the measure from the definition in the EU Regulation No 1307/2013)<sup>8</sup>, as well as in the setting up of the planning units (at the level of the technical project the applicants must respect the correlation

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<sup>6</sup> Ministry of Agriculture and Rural Development (2018): Annual NRDP 2014-2020 Implementation Report, Version 2017.0, p. 51.

<sup>7</sup> As mentioned in the Applicant's Guide for Session 2 which has ended and is available at: [http://www.apia.org.ro/files/pages\\_files/18-11-08-06-26-44Ghidul\\_solicitantului\\_Masura\\_8\\_Sesiunea\\_2\\_Ed\\_II\\_rev\\_1.pdf](http://www.apia.org.ro/files/pages_files/18-11-08-06-26-44Ghidul_solicitantului_Masura_8_Sesiunea_2_Ed_II_rev_1.pdf). The third session has been launched after the structuring and observation phases, being on-going (11th of December 2018 – 28th of June 2019) and the documentation being available here: <http://www.apia.org.ro/ro/schema-de-ajutor-de-stat-sprijin-pentru-primar-impadurire-si-crearea-de-suprafete-impadurite-aferenta-masurii-8-investitii-in-dezvoltarea-zonelor-impadurite-si-imbunatatirea-viabilitatii-padirilor-submasura-8-1-impaduriri-si-crearea-de-suprafete-impadurite-din-cadrul-pnдр-2014-2020-sesiunea-3>.

<sup>8</sup> Technical Fiche for Measure 8 – Investments in the development of forested areas and in the improvement of forest viability (articles 21-26), p. 20.



between APIA plots and landscaping units created by the afforestation technical project)<sup>9</sup>, these stages being important because payment is granted differently according to land classification category. To correct and mitigate the impact of the difficulties encountered, changes were made to the IPA online system in the second session. In this respect, additional verification conditions have been introduced to ensure correct correspondence between SAPS plots and project planning units. Considering, however, that APIA uses the IACS computer system at the level of agricultural parcels, and the planning units are a separate layer (difficulties being encountered in some cases in making a correspondence between the two) and the applicants - on the basis of technical projects - declare forest management units to the Forest Guard, a future potential simplification in the implementation could include the development of a common or interconnected computer system between APIA and the Forest Guard, which would facilitate the verification of the fitting of the areas into the planning units.

Difficulties were encountered during the first session and after the assessment and selection stages were completed, APIA county centers signaling the impossibility to sign the financing contracts, aspect generated by the inconsistencies between the national legislation and the procedural provisions (the measure sheet initially foresaw the establishment of a plantation after signing a *financing contract*). In this respect, according to APIA procedural provisions, although it was a delegated body for the implementation of the submeasure, it did not have the necessary financial competencies to be able to conclude financing contracts with the beneficiaries<sup>10</sup>. In order to correct these problems, modifications were made in the measure fiche - by amending the NRDP 2014-2020 document (version VI of the programming document being approved in the second semester of 2018), the form of support being changed from financing contract to commitment.

The implementation flow of the submeasure is generally complex, involving several public institutions (APIA, FG, AFRI), a pre-application stage involving a number of costs for potential beneficiaries (costs incurred before accessing the submeasure), a long implementation period of the commitment (12 years) and a relatively short time for submitting the application files.

#### **Additional requirements (not deriving from European and national legislation) and potential effects**

<b>Additional requirement</b>	<b>Intensity of the requirement upon the applicant</b>	<b>Intensity of the requirement upon the relevant authorities</b>	<b>Degree of complexity of the requirement</b>
With regards to the field checks carried out by AFRI, at present when all the payment requests are submitted, control samples are taken, APIA performs the	This procedural flow generates a longer period of time required for control.	NA	

<sup>9</sup> Aspects indicated during the interview at the Payment and Agricultural intervention Agency (31st of October 2018).

<sup>10</sup> Ministry of Agriculture and Rural Development (2018): Annual NRDP 2014-2020 Implementation Report, Version 2017.0, p. 52.



controls, it communicates to AFRI the results of the controls, and AFRI extracts the super control sample from the sample control, this flow causing a doubling of the control period.			
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At the level of submeasure 8.1, initially two requirements were identified which could be modified in order to support the submeasure's access rate as well as to make more efficient its implementation. On the one hand, the exclusion from the category of eligible applicants of entities against which decisions to recover state aid managed by APIA and AFRI (if the decisions were not executed) has been considered as being likely to restrict access to the submeasure of a category of potential beneficiaries which, given the compensatory nature of the submeasure, could extinguish the debit to a payment agency under a compensatory mechanism – and thus facilitate access to new opportunities of funding. However, modifying this requirement would entail modifying the legislative framework on state aid. Moreover, this requirement is established based on the so-called Deggendorf principle<sup>11</sup> that involves the exclusion of beneficiaries subject to a recovery order from the category of eligible applicants for state aid/de minimis (until the recovery/ reimbursement of the aid for which a decision has been issued). With this aspect in mind, the requirement can not be considered as an element of overregulation. At the level of the effective implementation of the submeasure. AFRI's over-control at the level of the payment requests could be carried out simultaneously with the controls carried out by APIA regarding the location and measurement of the surfaces and the verification of compliance with eco-conditionalities, respectively simultaneously with the controls carried out by the Forrest Guard with regards to the compliance of beneficiaries with the technical projects. A concurrent approach to over-control with the on-the-spot checks could have the effect of reducing the time required for the controls to take place. At the same time, considering that the procedural deadlines, in particular those related to the evaluation and selection phases, were not respected, in conjunction with a potential change in the procedure for carrying out the controls (in the sense of AFRI undertaking simultaneous controls) , a measure that would have a more significant impact would be to better coordinate and to monitor the way delegated functions are fulfilled by the institutions involved in the procedural flow of the submeasure.

### Actions implemented to reduce administrative burden

Phase	Implemented actions
Application	Modification during session 2/2017 of the IPA online system by introducing additional verification conditions (performed prior to the technical design) to ensure correspondence between the SAPS plots and the design units targeted by the projects. Based on this modification, the architects contracted by the

<sup>11</sup> Principle established on the basis of settling the joint cases TWD Deggendorf vs. T-244/93 and T-486/93. The European Commission (1995), establishing that the beneficiary of unlawful aid or abusively used lawfully granted aid, can no longer receive any other State / De minimis aid until the actual recovery of the aid (with interest related).



	potential beneficiaries received the approval regarding the method of constituting the planning units prior to the technical project, which facilitated the approval procedure by the Forest Guard.
Signing of the commitment	Changing the form of grant support from the finance contract into commitment, correlating the technical datasheet of the measure with national legislation and eliminating the blockage generated at the first session.

### **Actions implemented by other EU member states/regions in order to reduce administrative burden**

In the case of Veneto region no specific actions were introduced at the level of this submeasure in order to reduce administrative burden, however some elements of over-regulation have been defined to better complement the strategy.

Permanent afforestations are excluded:

- On land located in mountain areas;
- On permanently cultivated lands or permanent pastures;
- On land located in environments where afforestation could lead to a decrease in biodiversity (eg.: marshes, wetlands etc.).

In the case of the Aragon region, a specific element of simplification is the fact that this measure is accessible only by the Autonomous Community of Aragón, which, in the exercise of its powers, carries out actions in the forestry area of Aragon according to the purposes and competences attributed to the corresponding regulations.

In the Tuscany region, on the contrary, the submeasure is eligible for a wide variety of beneficiaries: owners, public and private land administrators or individuals have the right to apply for support as managers who manage land plots for civil use and their consortia. In the case of land owned by the State, support may only be granted if the management body of such land is a single individual or a municipality, single or associated.

### **Analysis of the current status of commitments by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored programme implementation)**

The two sessions were organized between November 2016 - March 2017, and August - November 2017, with delays in the selection process (changes were made to the measure fiche which required the modification of the electronic application, its testing, the notification of applicants and the processing of the new documents requested for resuming the selection process), as well as in the stage of signing the commitments (generated by inconsistencies between the provisions of the measure fiche and the rules on the activity, attributions and functioning of APIA). These aspects have led to the extension of the period allocated for signing the commitments and, implicitly, setting up the planting.

Nr. Submitted requests	Nr. Eligible requests	Nr. Signed commitments
37 (Session I) 17 (Session II)	34 (Session I)	34 (the signing of commitments is on-going at the time of the analysis)

### Analysis of selection criteria

Selection criteria	Maximum score awarded at the level of the selection criteria (Session I and II)	
SC 1 Principle of protection function (giving priority to the set up of forest protection curtains)	Maximum 30 points (Session 1/2017)	Maximum 30 points (Session 2/2018)
SC 2 The principle of land location (giving priority to lands proposed for afforestation located in deficient areas in forests)	Maximum 20 points (Session 1/2017)	Maximum 20 points (Session 2/2018)
SC 3 The planting size principle (giving priority to the proposed afforestation lands of a larger surface)	Maximum 20 points (Session 1/2017)	Maximum 20 points (Session 2/2018)
SC 4 Principle of land rehabilitation function (giving priority to afforestation of land located in TAUs affected by aridation, erosion or salinisation phenomena, depending on aridity index, erosion degree or salinisation degree)	Maximum 20 points (Session 1/2017)	Maximum 20 points (Session 2/2018)
SC 5 Principle of species diversity (giving priority to afforestation projects proposing at least 2 basic species in composition)	Maximum 10 points (Session 1/2017)	Maximum 10 points (Session 2/2018)

During the two completed sessions, 5 selection principles were applied, the principle of the protection function benefiting from the highest weight, ie 30% of the total score awarded. A look at the Final Selection Report published for the first submission session indicates that only one project scored on this criterion. Moreover, in spite of the stability of selection principles and their weightings in the total, the relatively low number of applicants and the non-use of the financial allocation led to the non-exclusion of projects submitted on the basis of the accumulated score, but only on the basis of the eligibility analysis. From this point of view, it is not possible to analyze the relevance of the selection criteria from the perspective of project hierarchy with an effective contribution to the achievement of the strategic objectives.

### Proposals to reduce administrative burden

Phase	Proposals to reduce the administrative burden	Expected effects
Application	N.A.	



Implementation	Improving the procedural flow at the level of site inspections. Thus, it is recommended that AFRI carries out the checks independently and concurrently with the verifications made by the other entities involved (APIA and FG) so that the control period is reduced, and the results will be reconciled at the moment when all checks are completed. However, considering that the procedural deadlines for the evaluation and selection phases have been exceeded, an additional recommendation to streamline procedural flow would be to improve inter-institutional coordination and to supervise the way delegated functions are being carried out.	It is estimated that the verification period will be shortened and, implicitly that the process will be streamlined.
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**sM 9.1 Establishment of producer groups in the agricultural sector**

**sM 9.1a Establishment of producer groups in the fruit sector**

**Overview of the submeasure**

<b>Objective</b>	<ul style="list-style-type: none"> <li>➤ Improving overall performance and increasing farm / fruit growing yields;</li> <li>➤ Better market integration of primary producers by adapting their production to market requirements and sharing their production;</li> <li>➤ Creating and promoting short chains;</li> <li>➤ Compliance with EU environmental and climate standards, food safety, etc.</li> </ul>
<b>Eligible beneficiaries</b>	<p>9.1</p> <ul style="list-style-type: none"> <li>• Agricultural producer groups that are officially recognized by MARD before requesting the support, but after January the 1st 2014, in accordance with the national legislation in force;</li> <li>• Recognized producer groups are also eligible for products and / or product groups supported through submeasure 9.1a, but have also been recognized for products and / or product groups supported by submeasure 9.1.</li> </ul> <p>9.1a</p> <ul style="list-style-type: none"> <li>• Fruit growing producer groups officially recognized by MARD before requesting the support, but after January the 1<sup>st</sup> 2014, in accordance with the national legislation in force;</li> <li>• Producer groups that have also been recognized for products and / or product groups supported by submeasure 9.1 but also recognized for products and / or product groups supported by submeasure 9.1a.</li> </ul>

<p><b>Context for support provision</b></p>	<ul style="list-style-type: none"> <li>Eligible expenditures are those resulting from the establishment and operation of the agricultural / fruit growing groups set out in the Business Plan, necessary to achieve the proposed objectives.</li> </ul>
<p><b>Procedural flow</b></p>	<p>Application:</p> <ul style="list-style-type: none"> <li>Filling in the application form, according to the standard model;</li> <li>Submitting the electronic format of the application form and the annexed documents (according to the list foreseen in the AG);</li> <li>Framing the application form according to the prescoring.</li> </ul> <p>Selection/Contracting:</p> <ul style="list-style-type: none"> <li>Checking the application form's eligibility;</li> <li>Checking the selection criteria;</li> <li>Selecting the projects;</li> <li>The object of the financing contract is represented by the grant of non-reimbursable financing by AFRI for the implementation of the application form submitted by the applicant.</li> </ul> <p>Implementation:</p> <ul style="list-style-type: none"> <li>The payment application file is submitted by the beneficiary to the County Office for Financing Rural Investments in the required format and with the necessary supporting documents.</li> </ul> <p>Monitoring:</p> <ul style="list-style-type: none"> <li>Verification of compliance with the business plan.</li> </ul>

### **Analysis of the implementation flow of the submeasure**

A first stage for the potential applicants is the recognition as a producer group based on the Order no. 37/2005 regarding the recognition and functioning of producer groups for the marketing of agricultural and forestry products, but after the 1st of January 2014. Thus, producer groups become officially recognized by MARD as being eligible for application.

Subsequently, the eligible producer groups complete the application file (which includes the application form with the adjacent annexes, including the business plan envisaged). The application file is verified by COFRI. Thus, the application is framed depending on the prescoring (the application is admitted for the verification of eligibility and selection criteria, if the applicant's score is greater than or equal to the minimum threshold), the technical and financial eligibility is next checked (verification of the applicant's eligibility, verification of eligibility criteria, verification of business plan and attached documents).

As a result, projects become ineligible, eligible to be placed below the minimum threshold or eligible to be placed above the minimum threshold. The main impediment to the creation of new producer groups was represented by the national legislation in force, by its continuous modification or the taxation of trade between the members and the producer group - this latter element adversely affects the interest of the economic operators to set up new groups of producers, considering the impact of specific legislation on the profitability of the investments. Also, although the submeasures have a certain degree of attractiveness,





some degree of reticence was observed on the part of the applicants about co-operative forms of organization or group of producers - most probably due to the political system prior to 1989 (ie the organization of cooperatives). At the same time, large groups of producers (either categorised based on the number of members or on the economic potential) avoid applying for funding through Measure 9 because of the relatively small amount of financial support provided in relation to the existing administrative burden for potential beneficiaries in preparing the application for funding and implementing the plan Business.

The main impediment to the creation of new producer groups was represented by the national legislation in force, by its continuous modification or the taxation of trade between the members and the producer group - this latter element adversely affects the interest of the economic operators to set up new groups of producers, considering the impact of specific legislation on the profitability of the investments made. Also, although the sub-measures have a certain degree of attractiveness, some degree of reticence was observed the applicants in what concerns the co-operative forms of organization or group of producers - most probably due to the political system prior to 1989 (ie organization as cooperative). At the same time, large groups of producers (due to the number of members or due to the economic potential) avoid applying under Measure 9 because of the relatively small amount of financial support provided in relation to the existing administrative burden for potential beneficiaries in preparing the application form and implementing the business plan.

The selection of projects consists in their evaluation by independent evaluators from AFRI, based on the evaluation procedures contained in the manuals of procedures approved by the order of ministry of agriculture and rural development. After finalizing the evaluation of projects submitted in a project submission session, AFRI draws up the Project Evaluation Report. Based on the published evaluation report, AFRI notifies applicants about the outcome of the project evaluation within a maximum of 3 working days.

After approving the selection report / appeal report, the RCFRI will notify the beneficiary about the decision to select the financing application and request the submission of the necessary documents for the conclusion of the financing contract. In order to conclude the financing contract, the applicant will submit to COFRI, within 30 days from the receipt of the notification regarding the selection of the application form, a series of original documents, in accordance with the documentation uploaded on-line. In the event of approval, the financing contract shall enter into force on the date of signature by both parties.

Payment is made in accordance with AFRI procedure, based on the payment application file submitted by the beneficiary to COFRI, the support being provided based on a flat-rate, degressive system, paid in annual installments for a maximum of 5 years. The last payment is made after checking the compliance with the business plan.

In general, the implementation procedural flow of the submeasure does not pose major difficulties, as producer groups have a better organization and generally have all the necessary documents for a good project implementation. Thus, no difficulties have been encountered to make payments so far.



**Additional requirements (not deriving from European and national legislation) and potential effects**

<i>Additional requirement</i>	<i>Intensity of the requirement upon the applicant/beneficiary</i>	<i>Intensity of the requirement upon authorities responsible with the implementation of the SM</i>	<i>Degree of complexity of the requirement</i>
Exact compliance with the initial business plan.	Additional condition in the context of having the possibility to achieve the goals set out and assumed without following exactly the aspects mentioned in the initial business plan.	NA	

**Actions implemented to reduce administrative burden**

The sub-measure has a low degree of difficulty, so no changes have been made to reduce the administrative burden.

**Actions implemented by other EU member states/regions in order to reduce administrative burden**

None of the selected regions nor Ireland have applied these submeasures.

**Analysis of the projects contracted at the end of June 2018 (to what extent have the simplifications provided in the NRDP favored the programme implementation)**

Submeasure	No. of contracted projects	No. of finalised projects	No. of cancelled projects
9.1	8	0	0
9.1a	0	0	0

There is an extremely low number of projects contracted under the submeasures 9.1 and 9.1a, the main reason being represented by the reluctance of economic operators to form co-operative organizations.

**Analysis of the selection criteria**

Selection criteria	Maximum score awarded for the selection criteria
SC 1 The principle of cooperation (producer groups that are part of an EIP Operational Group)	Maximum 10 points

SC 2 The principle of group representativeness (number of members)	Maximum 30 points
SC 3 The product quality principle (groups that are producing, storing and marketing HNV products or products participating in national and European quality schemes, etc.)	Maximum 25 points
SC 4 Principle of the priority sector (bovine milk, swine, vegetable, technical, medicinal and aromatic plants)	Maximum 15 points
SC 5 The principle of the association of small holdings	Maximum 20 points

**Score awarded at the selection criteria level for SM 9.1**

Selection criteria	Maximum score awarded for the selection criteria
SC 1 The principle of cooperation (producer groups that are part of an EIP Operational Group)	Maximum 10 points
SC 2 The principle of group representativeness (number of members)	Maximum 30 points
SC 3 The product quality principle (groups that are producing, storing and marketing HNV products or products participating in national and European quality schemes, etc.)	Maximum 35 points
SC 4 The principle of the association of small holdings	Maximum 25 points

The collection of selection criteria corresponds to the intervention logic of the submeasures. Thus, a high weight is given to the principle of group representativeness as well as to the quality of products.

**Proposals to reduce administrative burden**

Stage	Proposals to reduce the administrative burden	Expected effects
Monitorizare	Simplification of the monitoring/supervision of the projects and related business plans. Modifying the monitoring plan for the implementation stage of the business plan, in the sense of offering the possibility to beneficiaries to make changes to the business plan according to the specificity of the sales market or the current development situation, while meeting the binding / additional targets.	Developing producer groups without any constraints generated by the initial business plan. It reduces the administrative burden on the managing authority regarding the verification of exact compliance with the business plan.



**sM 10.1 Payments for agri-environment and climate commitments**

**Overview of the submeasure**

<b>Objective</b>	Encouraging farmers to introduce or continue to apply agricultural methods that are compatible with protecting and improving the environment, landscape and its features, natural resources and soil while contributing to maintaining genetic diversity.
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>➤ Farmers using agricultural land (packages 1-7, 9, 11);</li> <li>➤ Farmers raising pure-bred adult breeds of local breeds in danger of abandonment (package 8);</li> </ul>
<b>Context of the support provision</b>	<ul style="list-style-type: none"> <li>• Additional costs and income losses resulting from extensive management measures on agricultural land, aimed at achieving environmental objectives (biodiversity conservation, water and soil protection). For this purpose, compensatory payments paid annually (as a result of voluntary commitments) are granted as a fixed amount per unit area (ha) or LSU<sup>12</sup> (in case of Package 8, calculated for adult breeding females of pure breed).</li> </ul>
<b>Procedural flow</b>	<ul style="list-style-type: none"> <li>• Identification and digitization of agricultural land through the online IPA application;</li> <li>• Filling in the surface declaration (with alphanumeric data of the parcels measured through digitization);</li> <li>• Online filling in and paper submission of the unique payment application (signed) together with the necessary documents during the time allocated to the submission campaign (APIA local / county centers);</li> <li>• Preliminary administrative and administrative controls, (including over-declaration at the level of physical blocks), IACS database checks, cross checks with other databases (such as the Animal Register – from NSVFSA, NAZ, LPIS) (APIA local / county centers);</li> <li>• Evaluating and setting risk factors and establishing the control sample (Central APIA);</li> <li>• Performing field or teledetection inspections, summer / winter / spring checks (APIA local / county centres);</li> <li>• Carrying out the administrative controls on the data included in the single payment requests and resulting from the on-site inspections (APIA local/ county centres);</li> <li>• Error management and decision-making regarding the file (local/county APIA);</li> <li>• Calculating sanctions (APIA local/county centers) and payment authorization (central APIA);</li> <li>• Providing the proof of skills/knowledge and information required to implement the commitments;</li> <li>• Disbursement of payments (Central APIA);</li> </ul>

<sup>12</sup> Livestock Unit (LSU) at hectare represents the amount of livestock or number of animals per hectare of pasture.



- Filling in the agri-environmental booklet for each year of commitment and checking it to verify compliance with the specific requirements and the basic requirements.

### **Analysis of the implementation flow of the submeasure**

In general, the procedural flow of sub-measure 10.1 is not a very complex one, aspect that has been validated even at the level of data obtained from the survey applied to beneficiaries, which have generally considered as low to medium the complexity level of the information required to be entered in the single payment application, of the procedure of application, and of the process of verifying compliance with the commitment requirements. However, compared to the previous programming period (Measure 214 Agri-environment payments), the complexity degree of the sub-measure has increased through the introduction of new conditions, which are more difficult to meet by the beneficiaries of compensatory payments (eg. Targeting the eligibility of the agricultural land, demonstration of minimum agricultural activity etc.).

In this respect, the extensive transposition into the national legislation of Council Directive no. 91/676 / EEC of 12 December 1991 concerning the protection of waters against pollution caused by nitrates generated from agricultural sources (implemented through Government Decision No 964/2000 on the implementation of the Action Plan for the protection of waters against pollution caused by nitrates from agricultural sources and through the Code of Agricultural Practice for the Protection of Waters Against Pollution with Nitrates from Agricultural Sources adopted through MEWM/MARD Order No. 1182/1270/2005) has generated a number of strict conditions which may have an impact on the degree of access of environmental measures, especially by small farmers. In support of this argument, we mention the example of an extensive obligation for farmers to have manure storage capacities (in an individual and / or communal system).

In this sense, the European legislation mentions the obligation for Member States to include in the codes of good practice rules on "capacity and construction of reservoirs for the storage of effluents from zootechnical complexes"<sup>13</sup>. However, the Farmer's Guide on Ecoconditionality<sup>14</sup> foresees the obligation applied to farmers to secure manure storage facilities without structural defects whose size exceeds the need for manure storage (existing also the possibility of temporary storage on the field - subject to certain restrictions), taking into account the longest period of prohibition for the application of organic fertilizers to the agricultural land. This provision has caused particular difficulties among small farmers with land not inscribed in the Land Registry, which have encountered high costs and difficulties in obtaining all the necessary documents for the issuance of permits for the construction of individual manure storage platforms.

<sup>13</sup> Council of the European Union (1991): Council Directive no. 91/676 / EEC of 12 December 1991 concerning the protection of waters against pollution caused by nitrates from agricultural sources, JOUE no. 15, Vol. 2, Annex IV.

<sup>14</sup> Ministry of Agriculture and Rural Development (2018): Farmer's Guide on Ecoconditionality, Fourth Edition (Bucharest), pag. 14.

Concerning the difficulty degree of the conditions set under the various packages of the submeasure, it was observed that in the case of package 5 - Adaptation to the effects of climate change, conditions such as use (and demonstration of use) in equal proportions of two hybrids / varieties with different precocity (as well as the crop rotation done so that for at least two consecutive years at least three different cultures among the 4 eligible ones are used - corn, sorghum, sunflower and soybean) and that regarding the use of minimal tillage methods have affected the degree of attractiveness of package, within the 2018 campaign the package not registering any beneficiaries.

A potential justification could arise from the fact that only farmers holding arable farm areas of less than 10 hectares are eligible for this package<sup>15</sup>. In the case of beneficiaries with such limited areas, the obligation to use, for example, a system involving the use of tools that do not turn the furrow (eg chisel, plug paraplaw, scarifier) may exceed the compensatory amounts allocated per area committed. The supporting documents required for the submission of the payment application (including the official seed quality certificate, seed purchase invoice - which must include information on the hybrid used, the variety, its precocity and the official quality and compliance certificate of the supplier / producer) can contribute to the unattractiveness of the package to which to the complexity of requirements one also needs to consider the complexity of calculations involved in crop rotation. In the context of a low accessing degree in the case of this package, a recommendation would be for the Managing Authority to reconsider the effectiveness of its re-inclusion in the next programming period.

Last but not least, the requirement to demonstrate relevant knowledge and expertise prior to making payments has been identified as one of the causes that has fueled the decrease in the number of beneficiaries in the current programming period, the difficulties experienced by applicants being connected on the one hand to the absence of functional systems to provide adequate training / acquisition of knowledge and, in some cases, the typology of potential beneficiaries (elderly farmers at significant distances from urban areas). However, grace periods for compliance were established, with sanctions in some cases being applied, but the amount being a rather low one. However, being a condition also found in the European regulations underpinning the 2014-2020 NRDP, the possibility of simplifying this requirement could in the future only imply the prioritization of setting up an easily accessible and functional training system before starting the next programme.

#### ***Additional requirements (not deriving from European and national legislation) and potential effects***

No additional requirements have been identified in the case of submeasure 10.1 and at the level of the associated packages.

#### ***Actions implemented in order to reduce administrative burden***

Sub-measure 10.1 has benefited from changes designed to simplify access and its implementation, most of which come in support of beneficiaries. This included the possibility of diversifying tools used for mowing (in

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<sup>15</sup> The eligibility condition aims at avoiding double funding or overcompensation by overlapping with the requirements of greening practices (crop diversification), as set out in the measure fiche.

contrast to the previous programming period) for the relevant packages, while for basic requirements (including cross-compliance standards, minimum requirements for fertilizers and pesticides and minimum agricultural activity) the obligation for beneficiaries to comply with these requirements has been restricted only to the committed areas and not for all the parcels on the farm.

Phase	Actions implemented
<b>Application</b>	NA
<b>Implementation of the commitment</b>	In cases involving the transfer of ownership on the land subject to commitments and the refusal of the new owners to take over and maintain the terms of the commitments, the sanction applied to recover all the amounts paid were removed in the current programming period.
	Compliance with the basic requirements is no longer mandatory for all farm plots on the farm, but only for the plots engaged.
	In the case of packets targeting mowing (eg 1, 2, 3, 6, 9, 10, 11) the possibility of using light mechanized machinery was introduced (compared to the previous programming period), during the previous programming period the only accepted procedure being that of manual mowing.
	Payments for the packages applied to grassland have also been increased.
<b>Monitoring</b>	NA

#### **Actions implemented by other EU member states/regions in order to reduce administrative burden**

In Ireland, in order to reduce the administrative burden, applicants have the possibility to submit a simplified application form for the payment scheme in each year of the program when land plots are declared. Together with the simplified application form, each applicant will sign a six-year contract to cover the lifetime of the commitment, which is of six years in Ireland.

In the case of the Tuscany region, in order to mitigate the overall risk associated with this submeasure, mitigation actions are proposed in accordance with the following table:

Risks	Mitigation actions
Differences with regards to the surfaces which form the objective of the commitment	Using teledetection and on-site controls
Compliance with commitments provided by the transaction	In order to comply with the commitments, it has been established that documentation from the applicant's dossier should include elements such as the availability of certain machines and / or contractor invoices, seed purchase invoices, communications on the use of effluents, etc. and on-the-spot checks to be undertaken.
Gradual reduction of support	Particular attention is needed for the correct determination of reductions and exclusions by granting weightings for non-fulfillment of obligations according





Risks	Mitigation actions
	to the severity, magnitude and persistence of their breach.
Compliance with eco-conditionality requirements and minimum requirements for fertilizer use and plant protection.	For the cross-check of product compliance, controls are carried out by eco-conditionality operational organizations.
Supervising the activities carried out by the designated persons.	Consider the results of the control work on compliance with the eligibility criteria and commitments from the 2007-2013 programming period.

### Proposals for the reduction of administrative burden

Phase	Proposals to reduce the administrative burden	Expected effects
Submission of the single payment request	NA	NA
Implementing the commitment	Simplifying the conditions imposed in the case of Package 5 or opening it to larger farms (namely, consideration for the next programming period the possibility of extending the eligibility condition for farmers holding arable land smaller than 10 hectares) and developing a system of avoidance of double funding or overlapping with the requirements of greening practices (diversification of cultures), or better adaptation to potential beneficiaries. Better adaptation to the profile of the potential beneficiary (in case of maintaining the eligibility of farmers mentioned above) could also involve the development of an informative guide for the beneficiaries of this package in order to clarify the conditions attached to the commitments (including the details of the arrangements for ensuring the rotation of crops using at least 3 different cultures of the 4 eligible crops). At the same time, considering the rather limited interest in this package, an alternative recommendation would be to reconsider the opportunity / effectiveness of reintroducing the package in the next programming period.	By becoming available to a category of farmers with larger farms or alternatively supporting beneficiaries as they are currently defined (farmers holding arable land smaller than 10ha on farms) by developing a specific guide, the degree of access to this package could increase. However, considering the risk of double funding with the extension of the eligibility of areas and the low interest for this package, its non-activation at the next programming period could translate into a diminished administrative effort for the institutions involved in program management.
Monitoring	NA	NA



**Measure 11 Organic farming**

**Overview of the submeasure**

<b>Objective</b>	Encouraging farmers to shift from conventional farming to organic farming, and to maintain these methods after the initial conversion period. These practices are targeted as they contribute to protecting biodiversity, to maintaining fertility and soil functionality, to reducing pollution of water resources, to reducing carbon dioxide emissions and to ensuring animal welfare.
<b>Eligible Beneficiaries</b>	➤ Active farmers using farmland
<b>Context of support provision</b>	<ul style="list-style-type: none"> <li>• Additional costs and loss of income resulting from the application of organic farming practices. For this purpose, compensatory payments, paid annually, as a fixed amount per unit of area (ha) granted following the assumption of voluntary commitments for a period of:             <ul style="list-style-type: none"> <li>- 5 years to maintain organic farming (sM 11.2);</li> <li>- Maximum 2 years (for annual crops) and maximum 3 years (for perennial crops) for conveying to organic farming (sM 11.1), maintaining the certification of the areas covered by the commitment for a period of at least 5 years from signing the contract.</li> </ul> </li> </ul>
<b>Procedural Flow</b>	<ul style="list-style-type: none"> <li>• Identification and digitization of agricultural land through the online IPA application;</li> <li>• Completion of the surface declaration (with alphanumeric data of plots measured through digitization);</li> <li>• Submission of the online and paper version of the single payment request along with the necessary documents during the time allocated to the submission campaign (APIA local / county centers);</li> <li>• Preliminary administrative and administrative controls (including over-declarations at the level of physical blocks), IACS database cross-checks, cross-checks with other databases (ex.: Animal Register – NSVFS, NAZ, LPIS (APIA local / county centers));</li> <li>• Evaluating and establishing the risk factors and establishing the control sample (Central APIA);</li> <li>• Performing field inspections or remote control (teledetection), summer / winter / spring checks (APIA local / county centers);</li> <li>• Carrying out administrative controls of the data included in the single payment requests and resulting from the on-the-spot checks (APIA local / county centers);</li> <li>• Error management and decision-making on the file (local / county APIA);</li> <li>• Calculation of sanctions (APIA local / county centers) and payment authorization (Central APIA);</li> <li>• Provision of proof of the skills / knowledge and information required to implement the commitments;</li> <li>• Disbursement of payments (Central APIA);</li> </ul>

- Completing the organic farming notebook for each year of commitment and verifying it to check compliance with the specific requirements and the basic requirements.

### **Analysis of the implementation flux of the submeasure**

The implementation flow of Measure 11 is similar to that applied to submeasure 10.1, a common difficulty for the beneficiaries of submeasures 11.1 and 11.2 being that of proving the expertise and relevant knowledge before payments are made. At the same time, the requirement for annual renewal of the single payment request is maintained at the level of Measure 11, the supporting documents as well as the request itself having to be submitted even in cases where no changes are made to the initial situation. As it is the case of case two sub-measures aiming at supporting conversion to organic farming practices and methods, ie supporting the maintenance of ecological farming practices and methods, some of the related requirements derive from national legislation. Thus, obligations such as the annual registration of the beneficiary as an operator in organic farming (registration of activity at MARD) or the obligation to conclude a contract with an independent control body throughout the duration of the engagement stems from the MARD Order no. 1253/2016 on the registration of operators in organic farming. However, at least in the case of the first (annual registration), taking into account that annual inspection and certification bodies verify and certify operators registered in the organic farming system, a simplification of this registration process could reduce the administrative effort made by the beneficiaries. In this respect, in the absence of changes in environmental activity from year to year, the annual registration requirement could be abolished.

### **Additional requirements (not deriving from European and national legislation) and potential effects**

No additional requirements were identified at the level of submeasures 11.1 and 11.2.

### **Actions implemented to reduce administrative burden**

Phase	Actions implemented
Application	NA
Implementation	Compliance with the basic requirements is no longer mandatory for all farm plots on the farm, but only for the plots engaged/committed.
Monitoring	NA

### **Actions implemented by other EU member states/regions in order to reduce administrative burden**

In the case of the Veneto region, for the reduction of the number of applications and of administrative costs, the limit of 1 ha was set for surfaces. In Ireland there is a requirement for the minimum area of the holding is set at 3ha, except for horticulture producers (including the fruit sector) for which the minimum area of the holding is 1 ha.

### Proposals to reduce administrative burden

No additional requirements were identified at the level of Measure 11, but a recommendation that could have a positive impact on how commitments are implemented would be to develop a counseling system to assist beneficiaries.

### Measure 13 Payments for areas experiencing natural constraints or other specific constraints

#### Overview of the submeasure

<b>Objective</b>	Economic compensation for farmers' disadvantages in agricultural activities linked to the low production capacity of agricultural land and the additional costs of maintaining agricultural activities in constrained areas, aiming at reducing the risk of abandoning these activities and maintaining minimum land maintenance actions that have a beneficial impact on soil protection.
<b>Eligible Beneficiaries</b>	➤ Active farmers using farmland
<b>Context of support provision</b>	<ul style="list-style-type: none"> <li>• Additional costs and income losses that farmers bear because of the natural and specific constraints that occur in areas with an impact on agro-production;</li> <li>• Compensation payments paid annually as a fixed amount per unit area (ha) for the continuation of agricultural activities in designated areas with natural constraints or other specific constraints.</li> </ul>
<b>Procedural Flow</b>	<ul style="list-style-type: none"> <li>• Identification and digitization of agricultural land through the online IPA application;</li> <li>• Completion of the surface declaration (with alphanumeric data of plots measured through digitization);</li> <li>• Submission of online and paper version of the single payment request along with the necessary documents during the time allocated to the submission campaign (APIA local / county centers);</li> <li>• Preliminary administrative and administrative controls (including overdeclarations of physical blocks), IACS database cross-checks, cross-checks with other databases (eg.: Animal Register – NSVFSA, NAZ, LPIS) (APIA local / county centers);</li> <li>• Evaluating and establishing the risk factors and establishing the control sample (Central APIA);</li> <li>• Performing field inspections or remote sensing (teledetection), summer / winter / spring checks (APIA local / county centers);</li> <li>• Carrying out the administrative controls of the data included in the single payment requests and resulted from the on-the-spot checks (APIA local / county centers);</li> <li>• Error management and decision-making on the file (local / county APIA);</li> <li>• Calculation of sanctions (APIA local / county centers) and payment authorization (Central APIA);</li> <li>• Disbursement of payments (Central APIA).</li> </ul>

### **Analysis of the implementation flow of the submeasure**

Measure 13 is based on the most efficient implementation flow from environmental and climate measures, being a measure where no difficulties are encountered or reported by beneficiaries. Similar to the issues mentioned in submeasure 10.1, the beneficiaries of Measure 13 have the same obligation to comply with eco-conditionality standards, which in the case of farmers with very small and small farms can cause difficulties.

For submeasure 13.2 – Compensatory payments for areas facing significant natural constraints - there is a lack of correlation within the European regulatory framework with regard to the conditions imposed and the declared objectives in terms of how to designate the eligible areas. Thus, at the level of Regulation no. 1305/2013 a series of biophysical criteria is defined according to which the eligible areas are delimited (fulfilling in the case of at least 60% of the TAU agricultural area of at least one biophysical criterion provided in Annex III of the Rural Development Regulation). These areas are then further analyzed based on a fine tuning methodology based on criteria for the use of irrigation (for example, checking whether at the level of an area more than 50% of the agricultural area is irrigated), the share of permanent crops (live and orchards - checking for example whether there are crops suitable for arid areas on more than 20% of the agricultural area) and average yield for the main two crops on arable land (wheat and corn) to determine the degree of overcoming of constraints. In the case of the irrigation criterion, in certain situations, it was observed that large farms had the capacity to overcome the handicap generated by an arid climate by investing in irrigation systems, but this handicap could not be overcome by small farmers who do not have the resources to use water from irrigation systems. Thus, the application at the level of a TAU (village) of this criteria exclude from the beginning all potential beneficiaries. In this sense, there is need for a recalibration at the level of the next programming period of the manner in which eligible areas are determined (correlation of the methodology with the rural development objectives) so that a more efficient and balanced redirection among users of land affected by natural constraints could be secured.

### **Additional requirements (not deriving from European and national legislation) and potential effects**

No additional requirements were identified for submeasures 13.1, 13.2 and 13.3.

### **Actions implemented to reduce administrative burden**

In the case of Measure 13, simplification actions were carried out, such as:

Phase	Actions implemented
Submission of the single payment request	In order to facilitate the identification by potential beneficiaries of the eligible areas under submeasures 13.1, 13.2 and 13.3, the notification option regarding the placement of a plot in an eligible Territorial Administrative Unit under this Measure was introduced into the IPA online system.
Implementation	The additional costs induced by the limiting factors have been reassessed, which has led to an increase in the level of compensation payments.
Monitoring	NA



**Proposals to reduce administrative burden**

Not applicable.

**sM 15.1 Payments for forestry commitments**

**Overview of the submeasure**

<b>Objective</b>	<ul style="list-style-type: none"> <li>Reducing the number of silvicultural interventions in the forest and promoting timber exploitation technologies with a low-impact on soil by promoting voluntary commitments that go beyond the relevant mandatory requirements foreseen in the national forest management legislation.</li> <li>Through Package 1 - Ensuring quiet areas the main aim is that of ensuring optimum conditions for nesting, shelter and feeding for the development of forest ecosystems specific fauna.</li> <li>Through Package 2 - The use of slopes to collect wood from sharpening is aimed at protecting forestry resources by promoting extensive wood exploitation technologies with low soil impact.</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>Administrative-territorial units with public or private ownership of forestry land;</li> <li>Natural and legal persons who own forest land;</li> <li>Associations of the aforementioned beneficiaries subsequently established after obtaining forest land ownership (in accordance with Article 92 of Law No. 46/2008).</li> </ul>
<b>Eligible activities</b>	<ul style="list-style-type: none"> <li>Package 1: The loss of income due to the volume of wood associated with hygiene products that are not harvested over a period of 5 years in the quiet area and 4 years in the rest of the area covered by the planning units on which thinning works, regeneration cuts and hygiene cuts are planned. It also compensates for the loss of revenue from conservation cuts for a period of 5 years over the total area planted with such works.</li> <li>Package 2: The additional costs generated by the use of the lifts at the expense of mechanized means for performing thinning works are compensated.</li> </ul>
<b>Procedural Flow</b>	<p>Preliminary stage:</p> <ul style="list-style-type: none"> <li>Registration in the Unique Identification Register managed by APIA;</li> <li>Identification of forest lands and preparation of the technical dossier;</li> <li>The Forest Guard's approval of the technical dossier.</li> </ul> <p>Submission stage:</p> <ul style="list-style-type: none"> <li>Submission of the application for support online and / or on paper (CC APIA), verification of debts in the Debtors' Register and visual verification of the request for support (CC APIA, Central APIA and AFRI).</li> </ul> <p>Evaluation stage:</p> <ul style="list-style-type: none"> <li>Verifying compliance with eligibility conditions and specific conditions;</li> </ul>



- Granting scores;
- Ensuring over-control of eligible and ineligible APIA applications;
- Issuance and approval of the Preliminary Selection Report;
- Notifying applicants of the results of the preliminary selection;
- Submitting complaints about the results of the preliminary selection;
- Issuance and approval of the partial selection report;
- Notification of applicants regarding partial selection results;
- Solving complaints about preliminary selection results;
- Issuance and approval of the Final Selection Report;
- Notifying applicants of the results of the final selection;

**Implementation stage:**

- Establishing control samples (APIA for surface determination and administrative control) and over-control (AFRI) and carrying out on-site inspections (Forest Guard to verify eligibility conditions and specific conditions).
- Opening commitments by signing them;
- Online and on paper submission to CC APIA of payment requests (in the years 2-5 of commitment);
- Authorization and payment (APIA Central);
- Identification of forest lands and preparation of the technical dossier for the new forestry commitment (if it expires during the commitment period) and the approval of the new technical dossier (GF);
- Administrative controls, error management (CC APIA) and field controls (GF and APIA).

**Analysis of the implementation flow of the submeasure**

Similar to Submeasure 8.1, the implementation flow of Submeasure 15.1 also involves undergoing the preliminary stage of developing the technical dossier to be submitted for approval to the Forest Guard registry. The technical dossier, drawn up by the forest authorities, must include elements that will detail the relevant information regarding the forestry unit as clearly as possible (including a general outline of the surface for which support is requested and distinctly the outline of the area of silence – both presented on an optical / CD support) . However, at the time of uploading the information included on optical support into the IPA online system, APIA encountered difficulties generated by inaccuracies at the level of the layout units, making it impossible to correctly calculate the areas covered by the commitments on the two packages of submeasure 15.1. In order to correct these inaccuracies, all the procedures applied by the institutions involved in the implementation of the measure were discussed and detailed, and the remediation solutions will be proposed to the Forest Guard. However, the absence of a common approach (based on standardized information) generates in case of inconsistencies the need to re-establish technical dossiers, leading to a prolongation of the deadline for signing the commitments.

The novelty of the sub-measure was reflected both in the way of drafting the implementation documents and in the large number of institutions involved in its technical implementation<sup>16</sup>. The incomplete correlation of the procedures of APIA and FG has led to delays in the evaluation and selection process, while the procedural flow that involves going through the preliminary phase of the application, involving some initial costs from applicants, influenced the access rate of the submeasure.

#### **Additional requirements (not deriving from European and national legislation) and potential effects**

No additional requirements have been identified in the case of submeasure 15.1.

#### **Actions implemented to reduce administrative burden**

Phase	Actions implemented
Application	NA
Selection	By modifying the Regulation for the organization and operation of the selection process and the process of verifying the complaints for the applications for support for Measure 8 and Measure 15 in 2018, the determination of determination based on the selection criteria was eliminated for the sessions in which the total public value of requests for support was equal to or lower than the value allocated to the session.
Implementation	The elimination of the specific requirement regarding the maintenance of a volume of wood for regeneration cuts has reduced the administrative burden for both the beneficiaries (eliminating the obligation to present documents certifying the retention of this volume) and for the authorities (by removing the related controls).
Monitoring	NA

#### **Actions implemented by other EU member states/regions in order to reduce administrative burden**

None of the selected regions nor Ireland have applied this submeasure.

#### **Analysis of the situation of the commitments at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)**

The first submission session in the case of submeasure 15.1 was carried out between April and June 2017, during which 16 applications for support have been declared eligible at the level of the Selection Report, of

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<sup>16</sup> Ministry of Agriculture and Rural Development (2018): Annual NDRP 2014-2020 Implementation Report, Version 2017.0, p. 54.

which in the case of 5 requests support was given for committing eligible surfaces under Package 2. No commitments were signed at the time of the study.

No. of submitted requests	Nro. Of eligible requests	No. of signed commitments
28 (Sesiunea I)	16	0

### Analysis of the selection criteria

At the level of sub-measure 15.1, 3 selection principles, detailed below, were established, the highest share of the total awarded points being recorded for the first two selection principles. However, given the low rate of support requests (totaling around 2.7 million Euros) and the non-use of the session allocation, the selection was made at the level of eligibility criteria. In this respect, the relevance of selection principles in terms of hierarchy of requests for support can not be analyzed.

Selection criteria	Maximum score awarded for the selection criteria
SC 1 The Principle of prevailing protection functions (giving priority to requests for support for which the indicator „the share of forests situated in the functional TII type in the total committed area" is higher)	Maximum 40 points
SC 2 Priority area principle (priority being given to forests located in areas of high natural value)	Maximum 40 points
SC 3 The principle of ownership (giving priority to forest owners or their associations)	Maximum 20 points

### Proposals to reduce administrative burden

Phase	Proposals to reduce administrative burden	Expected effects
Application	More efficient assignment of tasks between elements verified by APIA and GF. At the eligibility criteria, applicants have to demonstrate that they have a forest management or forestry services contract with a forest authority for the surfaces for which the support is requested under the scheme (as a guarantee of compliance by the applicant with the minimum conditions established by the forestry regulations).	Considering that the verification of the signing of a forest management or forestry services contract with a forest authority is carried out by the Forest Guard, the evaluators do not consider necessary the reverification of this aspect by APIA. The expected effect would be the elimination of a document that the beneficiaries must submit together with the support request dossier.

Phase	Proposals to reduce administrative burden	Expected effects
	This is on the one hand verified by the GF, asking for the attachment to the technical file of the certificate from the forest authority to prove the fulfillment of the requirement. At the same time, APIA requests for the submission of the support request, in order to verify the presentation of the same type of certificate, which shows that the applicant has concluded a contract with a forest authority.	
Selection	NA	
Implementation	Develop a standardized IT solution that can be used both by the beneficiaries for the introduction of information as well as by APIA and GF to facilitate the verification process.	This shared managed application would standardize the format of the information used in the evaluation, reduce the time needed to reconcile the uncertainties in the evaluation stage, and last but not least, ensure the accuracy of the information. In this respect, the proposal would have a significant impact in particular at the assessment stage.
Monitoring	NA	

***sM 16.1 Support for the establishment and functioning of Operational Groups (OG), for the development of pilot projects, and new products in the agricultural sector***

***16.1a Support for the establishment and functioning of Operational Groups (OG), for the development of pilot projects, and new products in the fruit-growing sector***

### Overview of the submeasure

<b>Objective</b>	The objectives of submeasures 16.1 and 16.1a are to contribute to promoting innovation and cooperation in the agri-food sector, including the fruit-growing sector, through the development of pilot projects and new products, practices and technologies. The establishment of the Operational Groups under submeasures 16.1 and 16.1a will facilitate cooperation between farmers, research centers, universities, consultants and other relevant stakeholders in the agri-food sector, in order to increase the innovation level of these sectors and adapt the research results to sectoral needs.
<b>Eligible beneficiaries</b>	Beneficiaries of these sub-measures are operational groups, without a legal status, consisting of at least one partner from the categories below and at least one farmer / producer group / cooperative / other form of association in the fruit-growing sector: <ul style="list-style-type: none"> <li>Partner in the field of research (ex. production / processing / fruit packing), corresponding to the project theme;</li> </ul>



	<ul style="list-style-type: none"> <li>A partner who has as main activity the processing / marketing of fruit from the fruit sector or the production of packaging and other products destined for the sector as a main field of activity, in accordance with the project theme.</li> </ul>
<b>Eligible activities</b>	<p>Activities for the establishment and functioning of the EPI operational groups for the productivity and sustainability of agriculture and fruit growing sectors:</p> <ul style="list-style-type: none"> <li>Preparatory activities for the elaboration of the OG proposed project, respectively the elaboration of preparatory studies, feasibility studies and plans, the project plan and other documents necessary for the submission of the project;</li> <li>Activities for the functioning of the OG;</li> <li>Activities included in the submitted OG project plan.</li> </ul>
<b>Procedural flow</b>	<p>Stage of submission and selection of the expression of interest applications:</p> <ul style="list-style-type: none"> <li>Submission of expression of interest applications in order to select new or existing partnerships;</li> <li>Verification by AFRI of the eligibility criteria in the case of the submitted expression of interest applications;</li> <li>Evaluation and selection of expression of interest applications (AFRI and GDRD MA NRDP);</li> </ul> <p>Stage of submission, evaluation and selection of applications for funding and of the detailed projects of the Operational Groups:</p> <ul style="list-style-type: none"> <li>Submission of projects related to the expression of interest applications, following the selection report publication of the Stage I;</li> <li>Checking the eligibility of funding applications submitted by OG in stage I (AFRI / external evaluator);</li> <li>Evaluating the funding applications by external evaluators;</li> <li>On-the-spot verification of funding applications by RCFRI and external evaluators;</li> <li>Selection of the funding applications submitted by OG, accepted under stage I.</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>After the evaluation phase of the project, the second stage will follow the procedure for concluding the legal and financial commitments between the Contracting Authority and the beneficiaries</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>The beneficiary submits the application for payment to the Regional Center for Rural Investment Financing;</li> </ul> <p>Monitoring stage:</p> <ul style="list-style-type: none"> <li>Checking the fulfillment of the conditions assumed by the beneficiary.</li> </ul>

### Analysis of the implementation flow

SM 16.1 and 16.2 are two newly launched sub-measures in the current programming period, which have gained a high reputation among applicants due to the research and innovation activities financed through them.



The procedural flow of the two sub-measures includes two main phases - selection of the applications for expressing the interest and submission, evaluation and selection of funding applications and projects submitted by the selected operational groups in stage I.

The state of implementation is not very advanced, thus, at the moment of elaborating the present study, applications for expressing the interest for the establishment of operational groups were selected, while the procedural aspects related to the second stage have started.

#### ***Additional requirements (not deriving from European and National legislation) and potential effects***

At the level of the implementation flow of sM 16.1 and 16.1a no additional requirements that exceed the provisions of European and national legislation have been identified.

Until the moment of elaborating the study, the two sub-measures are in an early stage of implementation. The delays were mainly caused by the novelties the submeasure introduce, and significant administrative efforts are needed to define the implementation rules and procedures. An example of this is the interpretation and application of the rules on State aid and the identification of the incidence of State aid in relation to the final product of the projects.

#### ***Actions implemented to reduce the administrative burden***

Compared to other NRDP sub-measures, which impose to the applicants the preparation of physical documentation and holographic signature, sM 16.1 and 16.1a encourage the electronic signing of documents and their upload to the AFRI platform.

#### ***Actions carried out in other Member States / regions to reduce the administrative burdens***

In the Tuscany region, in order to reduce the administrative burdens, there is the possibility of submitting a preliminary draft of the financing request containing:

- the entity proposing the problem to be solved;
- the description of the problem to be solved by innovative solutions or specific promotional opportunities;
- a brief description of the planned activities;
- a list of subjects expecting to be involved;
- an estimation of the project budget.

#### ***Analysis of the current status of contracted projects, by the end of June 2018 (to what extent have the simplifications foreseen in the NRDP favored the programme implementation)***

sM 16.1 and 16.2 have shown a high degree of attractiveness and accessing among beneficiaries. Until the end of June 2018, a total of 190 applications for expressing the interest (117 under sM 16.1 and 73 under sM 16.1a) were submitted.



### Analysis of selection criteria

In stage II related to the selection of applications under sM 16.1 and 16.1a, there have been established 5, respectively 4 selection principles and criteria, the score given for each sub-criterion being different depending on certain preestablished sub criteria.

It is to be noted that with regards to sM 16.1, the highest weight (70% of the total score awarded) is covered by the principles related to the priority sector, in accordance with the National Competitiveness Strategy 2014-2020 and the NRDP 2014-2020 Strategy, compliance with priority directions based on national research, development and innovation strategies and quality products principles or the development of high added value products / technologies. Regarding sM 16.1a, a quasi-similar score is distinguished, with the difference in assigning a higher weight to the association principle.

Considering that the two sub-measures are still in the evaluation phase of applications for expressing the interest, an analysis of the effectiveness and relevance of the selection criteria can not be realized.

Selection criteria under sM 16.1	Maximum allocated score
SC 1 Priority sector principle in accordance with the National Competitiveness Strategy 2014-2020 and the NRDP 2014-2020 Strategy	Maximum 25 points
SC 2 The principle of complying with priority themes and directions according to the National Strategy for Development, Research and Innovation 2014-2020 and/ or Research Development - Medium- and long-term innovation Strategy in the agri-food sector 2014-2020-2030	Maximum 25 points
SC 3 The principle of quality products, the development of products or technologies with high added value	Maximum 25 points
SC 4 The principle of the adequate partnership structure based on the project objectives	Maximum 15 points
SC 5 The principle of association (Operational Groups which include producer groups or cooperatives in the agricultural sector)	Maximum 10 points

Selection criteria under sM 16.1a	Maximum allocated score
SC 1 The principle of complying with priority themes and directions according to the National Strategy for Development, Research and Innovation 2014-2020 and/ or Research Development - Medium- and long-term innovation Strategy in the agri-food sector 2014-2020-2030	Maximum 30 points
SC 2 The principle of quality products, the development of products or technologies with high added value	Maximum 35 points
SC 3 The principle of the adequate partnership structure based on the project objectives	Maximum 15 points
SC 4 The principle of association (Operational Groups which include producer groups or cooperatives in the fruit-growing sector)	Maximum 20 points



**Proposals to reduce the administrative burden**

Not applicable

**16.4 Support for horizontal and vertical cooperation between stakeholders of the supply chain in the agricultural sector**

**16.4a Support for horizontal and vertical cooperation between stakeholders of the supply chain in the fruit-growing sector**

**Prezentarea de ansamblu a submăsurii Overview of the submeasure**

<p><b>Objectives</b></p>	<p>The objective of sM 16.4 is to promote the cooperation among local stakeholders, for the purpose of selling food products through short supply chains. The sub-measure does not only involve cooperation between farmers, processors, retailers, restaurants, hotels and other forms of accommodation in rural areas, but also partnerships with non-governmental organizations and public authorities.</p> <p>The objective of sM 16.4a is to promote cooperation among local stakeholders for the marketing of fruit and fruit products through a short supply chain. This sub-measure will support the creation of short supply chains by facilitating cooperation in the fruit-growing sector, including the development of local markets for the marketing of products through the short supply chain.</p>
<p><b>Eligible beneficiaries</b></p>	<p>Partnerships composed of at least one partner in the categories below and at least one farmer or a producer / cooperative group operating in the agricultural sector:</p> <ul style="list-style-type: none"> <li>• Farmers;</li> <li>• Small and medium enterprises;</li> <li>• Non-governmental organizations;</li> <li>• Local councils;</li> <li>• Scholar, sanitary, recreational and public alimentation units.</li> </ul>
<p><b>Eligible activities</b></p>	<p>The support is granted for tangible and / or intangible cooperation and investment costs for the promotion of joint projects involving at least two entities that cooperate for:</p> <ul style="list-style-type: none"> <li>• Creating / developing a short supply chain / local markets (with food or fruit products), and / or</li> <li>• Promotion activities related to the creation / development of a short supply chain (with food or fruit products) and the local market served by the supply chain / chains.</li> </ul>
<p><b>Procedural flow</b></p>	<p>Stage of submitting the application form:</p> <ul style="list-style-type: none"> <li>• Finalizing the application and annexes;</li> <li>• On-line submission of the application form and its attachments</li> </ul> <p>Stage of verifying the application form:</p> <ul style="list-style-type: none"> <li>• Verifying the funding applications of projects without C+I, by COFRI;</li> <li>• Verifying the funding applications of projects with C+I, by RCFRI;</li> </ul>

<ul style="list-style-type: none"> <li>On-the-spot verification of applications form by COFRI (for Non-Construction Financing Applications) / RCFRI - for Construction Funding Applications;</li> </ul> <p>Stage of selection of projects:</p> <ul style="list-style-type: none"> <li>Checking the fulfillment of selection criteria and selection of projects;</li> </ul> <p>Contracting stage:</p> <ul style="list-style-type: none"> <li>Submission of support documents for contracting;</li> <li>Signing the financing contract;</li> </ul> <p>Implementation stage:</p> <ul style="list-style-type: none"> <li>Submission of the payment request in order to refund the expenses incurred;</li> <li>Verifying the payment request by COFRI/RCFRI;</li> </ul> <p>Monitoring stage</p> <ul style="list-style-type: none"> <li>Verifying the fulfillment of the conditions assumed by the beneficiary through the project / financing contract.</li> </ul>
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### Analysis of the procedural flow

SM 16.4 and 16.4a are implemented by the Agency for Financing Rural Investments and its territorial structures - Regional Centers and County Offices.

The procedural flow for implementing the projects funded under these sub-measures is summarized in the table above. An important aspect is that the application form can only be submitted online at [www.afir.info](http://www.afir.info), with applicants having to create a user account on the portal website. Also, the two sub-measures encourage the electronic signing of documents, submitted by applicants to access the non-reimbursable funds. This type of practice is used not only in the application phase, but also in the contracting and implementation stages (submission of the reimbursement application) with the advantage that the beneficiaries do not have to list and then scan the required documents.

The verification of the application forms and the on-spot verification is carried out by the COFRI for non-construction financing applications and by the RCFRI for construction applications.

### Additional requirements (not covered by European and national legislation) and potential effects

Additional requirement	Intensity over the applicant	Intensity over responsible bodies for management and implementation of the sub-measure	Degree of complexity of the requirement
The legal representative of the partner leader in relation to AFRI must be hired, with working contract, by the partner leader for an indefinite period or for a	Additional administrative burden for the applicant, which have to ensure the employment with a working contact of the legal representative of the partner leader.	Additional administrative burden for the authorities involved in verifying the additional documents.	

Additional requirement	Intensity over the applicant	Intensity over responsible bodies for management and implementation of the sub-measure	Degree of complexity of the requirement
period at least equal to the duration of the project.			
For grant applications that are selected for funding, applicants must submit to AFRI, prior to contracting, the tax attestation, which guarantees the absence of outstanding tax and social debts.	Additional administrative burden for applicants, since these documents could be requested directly from the competent institutions.	NA	

#### **Actions undertaken to reduce the administrative burden**

The main simplification measures adopted under sM 16.4 and 16.4a intervened as a result of encountering some difficulties with the internal payment procedures between the partners (AFRI was paying the amount to the leading partner, but if the latter was a public authority, it could not carry out the redistribution of the funds to the other partners; the solution adopted to avoid such difficulties was that public entities could no longer be partnership leaders, unless they were the only partner to make purchases and to make eligible expenditure).

At the sM 16.4 and 16.4a level, three call for proposals were launched and the fourth one was in the process of preparation.

#### **Analysis of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)**

At the end of June 2018, there were 30 projects contracted and one finalized project under sM 16.4 and 13 projects contracted under sM 16.4a, showing that the two sub-measures were implemented without encountering significant problems.

sM	No. of contracted projects	No. of finalized projects	No. of cancelled projects
sM16.4	30	0	1
sM 16.4a	13	0	0

#### **Analysis of the selection criteria**

Scorul acordat proiectelor depuse în cadrul sM 16.4 și 16.4a se calculează în baza următoarelor principii de selecție:

The score for projects submitted under sM 16.4 and 16.4a shall be calculated on the basis of the following selection criteria:

Selection Criteria	Maximum allocated points
SC 1 The principle of representativeness of cooperation, respectively the number of partners involved	Maximum 10 points
SC 2 The principle of the appropriate partnership structure based on the project objective	Maximum 35 points
SC 3 Added value principle (partnerships that produce and market high-value products, participating in national and European quality schemes produced by HNV farming systems, etc.)	Maximum 30 points
SC 4 The principle of 'local markets' (ie. less geographical distance between the point of production and the point of sale)	Maximum 25 points

Analyzing the distribution of the score on the selection criteria, it can be noted that the highest level of support lies in the principle of adequate partnership structure and added value principle, which together account for 65% of the total points that can be awarded to a project.

In general, no specific problems have been identified regarding the application and compliance with the selection criteria at the level of the two sub-measures, which are considered relevant from the perspective of project hierarchy with an effective contribution to the achievement of the NRDP strategic objectives.

#### **Proposals to reduce administrative burden**

Stage	Proposals to reduce administrative burden	Effects
Application	N.A.	
Selection	N.A.	
Implementation	N.A.	
Contracting	Signing a number of protocols/ contracts with qualified institutions to provide information on applicants, such as the Romanian Police Romanian Police (for obtaining the tax record).	Reducing the number of documents requested to the applicants and diminishing the number of procedural steps that they are required to undertake.
Monitoring	N.A.	

**sM 19.1 Preparatory support**

**Overview of the submeasure**

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>Increasing the collaboration capacity needed to develop integrated strategies that will enable local actors and representatives from different fields of activity to work together and interact in favor of communities in LEADER territories;</li> <li>Developing a local development strategy is an ideal opportunity for the LAG to actively involve local actors and new organizations. In this way, the LAG can analyze not only the development needs and opportunities, but also the mechanism of active involvement of the population;</li> <li>Institutional construction and networking actions to prepare and implement an integrated local development strategy for a certain area.</li> </ul>
<p><b>Eligible beneficiaries</b></p>	<ul style="list-style-type: none"> <li>Private-public partnerships established under a Partnership Agreement, regardless of whether they are territories covered by LAGs selected under the NRDP 2007-2013, or potential/ existing partnerships formed of partners that were members of the authorized LAGs and/ or partners who have not previously been members of the LAGs;</li> <li>Private business partners, as well as other civil society representatives will represent at least 51% at the decision-making level. City representatives will represent a maximum of 25% at the decision-making level (LAG governing bodies and selection committee) reported to the population covered in a LAG territory;</li> </ul>
<p><b>Eligible activities</b></p>	<p>The preparatory support for the development of the local development strategy aims at:</p> <ul style="list-style-type: none"> <li>Carrying out a local consultation and animation process with active involvement of local actors and local organizations. In this way, the LAG's potential will analyse both the development needs and opportunities, as well as the mechanism of active involvement of the population in the development of the area.</li> <li>Designing community-led local development strategy (through consultancy activities, conducting studies on the targeted area and actions related to stakeholders consultation to prepare the strategy).</li> </ul>
<p><b>Procedural Flow</b></p>	<p><b>Application phase:</b></p> <ul style="list-style-type: none"> <li>Submission of the Financing Request and its annexes to OJFIR;</li> </ul> <p><b>Evaluation and selection phase:</b></p> <ul style="list-style-type: none"> <li>Registering and administrative verification of the Application documentation - OJFIR carries out the administrative check based on the form "Administrative and Eligibility Criteria Check Sheet";</li> <li>If the administrative check reveals non-conformities between the submitted documents, the legal representative of the applicant/ its authorized representative is required to clarify the inconsistencies;</li> <li>Verifying the eligibility criteria for the Financing Request and the indicative budget;</li> <li>Additional information (once) may be requested during the phase of verifying the eligibility criteria;</li> </ul>



- Scoring: The score will be set for the grant applications declared eligible following the OJFIR check;
- Sample verification of Financing Requests will be done by AFRI. Financing Requests with the highest total risk (5% of the number of projects verified by OJFIR) will be checked;
- Completion of the verifications: The Evaluation Report will be elaborated and approved and it will include: eligible projects, non-eligible projects and withdrawn projects, as appropriate. For each eligible financing request, the score for the submitted project should also be mentioned;
- Solving complaints and elaborating the Selection Report: AFRI notifies the applicants of the results of the selection process, and the MA of RNDP sends to AFRI the Final Selection Report for publication on the AFRI website and for the notification of the applicants selected for signing the financing decisions.

**Contracting stage:**

- Closing and signing the Financing Decisions with the selected applicants.

**Implementation stage:**

- Carrying out activities as described in the Financing Request;
- During the implementation, the OJFIR experts will perform at least one field check on the activities mentioned in the Financing Request.
- Payment request: Submission of the Intermediate or Final Activity Report to request payments. The deadline for reimbursement of eligible expenses for a Payment Application File is maximum 90 days from the date when the payment request is complete.

**Monitoring stage:**

- Verification of fulfilment of the conditions assumed by the beneficiary at the project / financing contract level.

### ***Analysis of the implementation flow of the submeasure***

Sub-measure 19.1 implied an implementation flow that favored the submission of a considerable number of projects, with a high degree of attractiveness from potential beneficiaries. The number of LAGs selected is almost double than the one originally planned, with inevitable effects on the budget allocated to sub-measure 19.1. The allocation of funds addressed to LAGs was based on the number of inhabitants in the eligible territory. However, the allocated budget proved to be insufficient to cover the expenditure for preparatory support under sub-measure 19.1, being selected projects with a lower value than the available allocation at that time. With regard to the submitted projects, their value exceeded the initial allocation by only 35,000 Euro. Therefore, the implementation flow had to be better adapted to the needs of beneficiaries and territories, taking into account the internal coherence of the program's general budget.

At the stage of submission of projects and before the official launch of the call for projects, the selection manual and the applicant's guide as well as all the published documents were considered very useful.



Also, a meeting with representatives of the Managing Authority of NRDP and LAGs was organized to clarify the difficulties encountered and additional regional meetings were organized by the National Federation of LAGs where the representatives of the Managing Authority of the NRDP were also invited.

However, more than half of the sub-measure beneficiaries contracted external consultants to develop their strategies and to fill in the submission form, which is why the project documentation is considered to be beyond the competence of LAG employees to prepare the applications by their own, the application being considered to have a high level of complexity.

Regarding the implementation and payment phase, it is considered that many supporting documents to prove the implementation and effective deployment of the activities are requested. For example, a payment documentation for sM 19.1 can contain many documents that need to be submitted in physical form (pictures and attendance lists for the organized animation events, questionnaires to identify the needs in the territory applied among individuals, local authorities).

**Additional identified requirements (not derived from European and national rules) and potential effects**

<i>Additional requirement</i>	<i>Intensity of the requirement on Applicant / Beneficiary</i>	<i>Intensity of the requirement on the Relevant Authority</i>	<i>Degree of complexity of the requirement</i>
Partners within a LAG have equal votes (1 member = 1 vote). The impossibility to modulate decision-making mechanisms based on the different institutional weight / interest of the members.	This requirement has the effect of multiplying, in some cases artificially, the number of LAG members to comply with the 49% threshold set by the regulation for each category of partners. Multiplication of members creates problems in the decision-making process and weakens the capacity of the LAG to develop and to gain the representativeness of the territory and of the main stakeholders. The different weight of votes could be determined by the sector in which the entities originate, taking into account their overall representativeness and international status (for example: the public sector could have a maximum of 49% of the votes, regardless of whether it is represented by 1, 2 or more public entities).	NA	
Implementing the reimbursement mechanism of project	The requirement generates additional effort for beneficiaries in the preparation of payment files and the	Authorities checking expenditures need a longer period of time	



<b>Additional requirement</b>	<b>Intensity of the requirement on Applicant / Beneficiary</b>	<b>Intensity of the requirement on the Relevant Authority</b>	<b>Degree of complexity of the requirement</b>
expenditures (to the detriment of a standard cost mechanism)	transmission of all supporting documents that demonstrate each expense incurred in the project.	and additional human resources to verify the expenditures and all supporting documents submitted by the beneficiaries.	

### **Actions to reduce administrative burdens**

The main measures taken to reduce the administrative burden for potential beneficiaries were:

- Elaboration of manuals for selection and their effective dissemination.
- Involvement of NRDP and NFLAG at all stages of information and promotion of project calls by organizing meetings, events and working groups to clarify the technical aspects and to answer the questions of the potential beneficiaries

### **Actions carried out in other Member States / regions to reduce the administrative burdens**

In Ireland, the bottom-up approach of the LEADER methodology requires robust and manageable systems for financial control and regulatory compliance. The implementation of LEADER operations during the 2007-2013 programming period identified a number of risk areas and provided a substantial learning process with regard to the types of systems needed to reduce this risk. The main identified risks relate to issues such as:

- the financial capacity of LAGs that were independent legal entities and the need to ensure the sustainability of RDP-funded operations by ensuring compliance with the regulations;
- a particular implementation framework for sound financial management;
- audit findings in areas such as administrative procedures, financial controls and reporting and public procurement issues.

In Ireland, considering the cost reduction in purchasing second-hand equipment, even if it is usually considered not to be eligible (Article 13 of EU Regulation 807/2014), the ministry suggests taking into account the eligibility of procurement second-hand equipment only in sub-measure 19.2.

Procurement of second hand equipment may also be considered as eligible expenditure if the following conditions are met:

- The provider of the second-hand equipment provides a written statement indicating the origin of the equipment and confirms in writing that it has not been purchased in the last 7 years with national or Community financial support;



- The price of the equipment does not exceed its normal market value and is lower than the cost of similar new equipment;
- The equipment has the technical features necessary for its operation and complies with applicable standards and norms.

In Veneto region, the preventive / corrective actions implemented for potential risks concern:

- a) eligibility and reimbursement of expenses based on the calculation of the simplified cost. If this reimbursement methodology is not foreseen, detailed procedures will be established to guarantee the fairness of costs and reduce the chances of error both by the beneficiary and by the paying agency.
- b) special committees are being set up to assess the quality of the projects submitted.
- c) continuous updating of the specific procedural manual for contract verification based on the evolution of legislation. The region's and the paying agency's staff are trained at different levels of detail.

The LEADER approach in the Tuscany region program is characterized by a great focus on cost-effectiveness, representation and institutional status of the LAG.

Prior to launching the LAG selection call, the MA preselects the eligible territories and sets criteria for aggregation so as to stimulate the application of important territories.

A maximum number of eligible LAGs (7) is set in the call, requiring territories to be grouped in uniform areas.

Public bodies are required to play a key role in setting up a LAG: a local authority may enter a single LAG and each LAG must include public bodies covering at least 60% of the area concerned.

The LAG Association Agreement must comply with the quota set by the Regulation (no subject category should exceed 49% of the voting rights). Each member may join with any weight in respect of voting rights, the distribution of voting rights among members being negotiated and established in the statute and / or in the founding agreement. This allows public bodies to access a LAG with considerable decisional weight, corresponding to their status. On the other hand, the number of private representatives may also be limited if they have voting rights that create difficulties for the individual process (eg in the case of business associations). The participation of individuals and individual companies in LAGs is rare and, anyway, is not useful (if not problematic) with the criteria set out in the appeal.

Finally, the resulting LAGs are limited, composed of a limited number of highly representative subjects and strongly supported by local and private public forces.

***Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)***

By the end of June 2018, out of 180 submitted projects, 164 were contracted during 2014-2020. Over 93% of the contracted projects have been completed, which highlights the fact that there are no significant problems encountered in the implementation of the projects



No. of contracted projects	No. of completed projects	No. of cancelled projects
164	153	9

**Analysis of the selection criteria**

Selection criteria	Maximum score awarded at the selection criteria
SC 1 Expertise of the applicant's employees	- Maximum 25 points (session 2016)
SC 2 Representation of the private sector and civil society within the partnership	- Maximum 20 points (session 2016)
SC 3 Partnerships that include at least one minority organization relevant to the territory	- Maximum 5 points (session 2016)
SC 4 Partnerships that include at least one of any of the associative forms relevant to the territory (eg: producer group, agricultural or craft cooperatives, water user organizations, animal breeders associations, etc.)	- Maximum 10 points (session 2016)
SC 5 Partnerships covering territories that have not benefited from LEADER funding (not part of a LAG financed under LEADER-NRDP 2007-2013)	- Maximum 20 points (session 2016)
SC 6 The average population density in the territory targeted by the partnership	- Maximum 20 points (session 2016)

Six selection criteria were applied during the project submission session, and the criterion that benefited from the highest share, ie 25% of the total score, was the criterion for the applicant's staff expertise.

No specific problems have been identified regarding the application and compliance of the selection criteria on this sub-measure, which are considered relevant from the perspective of project hierarchy with an effective contribution to the achievement of the objectives of the strategy.

For this sub-measure no minimum score threshold was applied.

**Proposals to reduce administrative burden**

Stage	Proposals to reduce administrative burden	Expected effects
Submission	For the next programming period, if the legislation permits, there can be considered the allocation of a disproportionate proportion of votes to LAG partners, depending on their involvement and interest.	This simplification measure has the role of giving LAG partners the right to vote according to their actual involvement in the LAG's activities by renouncing the procedure providing for equal voting rights for all partners, regardless of their contribution to the development of the LAG and LDS. Such a mechanism would imply a more appropriate representation of the LAG compared to the actual share and interest of the stakeholders at local level and a better motivation of the members to actively involve themselves, as well as the implementation of an efficient and effective decision-making procedure within the LAG.
Implementation	Among the issues that can be simplified in the future programming period (if preparatory support is still available), there is the possibility of giving up to the reimbursement mechanism and replacing it with the simplified cost option.	Making payments based on simplified costs would greatly facilitate the effort and resources used by both beneficiaries in the preparation of payment files and the resources of the management authorities involved in the actual analysis of the documentation.
	Including LAGs in the category of beneficiaries who can submit online payment requests.	By offering the LAGs the possibility to submit their online payment requests, their administrative effort will be reduced and there will be the possibility to renounce at the very complex documentation (sometimes containing even three dossiers in the case of a one payment requests). In conjunction with the previous proposal to use simplified costs, the measure effectively supports the procedure for submitting payment requests, relieving the administrative burden on both the beneficiaries and the authorities involved in managing the program.

Separately to the preparatory support provided under sub-measure 19.1, the program authorities organized the **selection stage of local development strategies** elaborated under Measure 19, developing and following a different procedure regulated by manuals and instructions published on the website of the Managing Authority for NRDP.





At these stages of the procedural flow, a great advantage for the applicants was the possibility to get in touch with SLIN or others responsible for the implementation of the submeasure, in order to clarify all the aspects necessary for the preparation of the projects. As in the case of other measures, in order to inform potential beneficiaries, clarification documents and specific guidelines have been published on the official website of MARD and AFRI.

The selection of LDSs was realised in one call (while two calls were launched during the previous programming period) and was based on an analysis of the selection criteria aimed at choosing the most appropriate strategies to meet the needs of the territories.

The selection phase culminated in the selection of 175 partnerships, a much larger number compared to the initial planning. Some of the legally constituted LAGs have gained experience in the previous programming period and are members of the National Federation of LAGs (NFLAG), which cooperates with the MA, especially in information / communication activities addressed to the local actors. The selection of LDSs was realized in a single call and was based on an analysis of selection criteria aimed at choosing the most appropriate strategies to meet the needs of the territories.

**Additional requirements identified in the LDSs selection stage:**

<i>Additional requirement</i>	<i>Intensity of requirement on Applicant / Beneficiary</i>	<i>Intensity of requirement on Relevant Authority</i>	<i>Degree of complexity of the requirement</i>
Modifying the implementation and monitoring conditions after the actual implementation of the projects and their retroactive application (eg at the time of submitting the projects, the "number of jobs" were considered as monitoring indicators, without specifying that they refer only to the private sector; afterwards, through an address issued by the Ministry at the end of the implementation of the measures, the beneficiaries were informed that these jobs will not be taken into account).	This provision causes difficulties for the beneficiaries who started the implementation of the projects based on the commitments assumed by the contract and who, after the issuing of the ministerial orders, are in the situation of not reaching the monitoring indicators. There is a selection criterion based on which scores were awarded for LDSs that had a specific number of newly created jobs, but these jobs can be relocated to other measures that can ensure the fulfillment of the criterion (especially as these indicators have been established before the bonus is granted - which is supposed to be an additional amount intended to exceed the initially assumed targets).	NA	

**sM 19.2 Support for the implementation of actions within the local development strategy**

**Overview of the sub-measure**

<p><b>Objectives</b></p>	<ul style="list-style-type: none"> <li>• Stimulating innovation;</li> <li>• Strengthening local identity and local profile;</li> <li>• Improving the quality of life and attractiveness of the local area;</li> <li>• Solving demographic problems;</li> <li>• Creating and retaining jobs in the LEADER areas;</li> <li>• Improving equal opportunities for young people, women, elderly people, people with disabilities and members of minorities;</li> <li>• Increasing competitiveness at the local level;</li> <li>• Conservation of resources and protection of the natural environment;</li> <li>• Applying an integrated and multisectoral approach.</li> </ul>
<p><b>Eligible beneficiaries</b></p>	<ul style="list-style-type: none"> <li>• Private/ public legal entities, established by the measure fiche of the Local Development Strategy, complying with the provisions of the European Union Regulation 1305/2013;</li> <li>• If the Local Development Strategy identifies the opportunity to develop operations of public interest for the community and the targeted territory, for which no other applicant expresses its interest, the LAG may be beneficiary subject to the application of the measures to avoid the conflict of interest.</li> </ul>
<p><b>Eligible activities</b></p>	<p>Projects submitted under sub-measure 19.2 may be included into one of the following categories:</p> <ul style="list-style-type: none"> <li>• investment projects, namely investments in infrastructure, investments in the agricultural and forestry sectors, non-agricultural investments;</li> <li>• flat-rate projects (agricultural and non-agricultural), where support is provided in installments with a predetermined value (nominal or percentage), depending on the specificity of each measure;</li> <li>• service projects, ie projects targeting intangible operations such as organizing events, training, professional training, information, etc .;</li> <li>• Mixed projects (investments and services) that will be managed as investment projects, as the existence of an investment component leads to the obligation to maintain the investment objectives for a minimum period set in the national implementation framework (eg co-operation projects).</li> </ul>
<p><b>Procedural flow</b></p>	<p>Application stage</p> <ul style="list-style-type: none"> <li>• Submission of the Financing Request and its annexes;</li> </ul> <p>Selection stage</p> <ul style="list-style-type: none"> <li>• Establishing a non-discriminatory and transparent selection procedure for projects is set out in LDS;</li> <li>• Launch of selection calls and submission of projects to the LAG: In order to open the project reception sessions, the LAG launches project selection calls according to the priorities outlined in the strategy.</li> </ul>

- Submission of the Financing Request and the related annexes (available on the LAG website) and their registration by the LAG.
- Evaluating project eligibility and awarding scores. The LAGs will evaluate the documents and select the projects, based on the LDS approved selection criteria, in a transparent selection process. Evaluators, established in compliance with LDS, will check the eligibility of projects and award the scores for each grant application. All verifications are based on the verification checklists developed at the LAG level.
- Elaboration of the selection report: it will be signed by all the present members of the Selection Committee (legal representatives or other persons mandated by the respective legal entities in accordance with the statutory provisions), specifying their belonging to the private sector; or public - with the observance of the provisions of the NRDP, that the public side represents less than 50% and that the urban organizations represent less than 25%.
- Selection of projects after the last selection call launched by the LAG. The LAG will issue an additional Selection Report related to the same session, which will mention the funding source available / measure, resulting from the cancelling of the financing contracts, the savings made on finalizing the financing contracts, the amounts not committed as a result of the non-conclusion of the contracts, amounts resulting from declaring non-compliant/misdirected / ineligible / eligible and unselected (following a Caution Note) at AFRI level of projects declared eligible and selected by the LAG).

#### Eligibility at AFIR level

- Submission of projects at AFRI level: LAG representatives or applicants may submit projects to AFRI no later than 15 working days after the LAG Selection Report indicating the selected project status. Projects will be verified as they are submitted by LAG representatives or applicants, being a permanent open session until the funds allocated to sub-measure 19.2 have been exhausted within each Local Development Strategy.

#### Contracting Stage

- Signing the financing contract: The RCRIF Experts will send to the applicant the Notification Form of the Applicant regarding the signing of the Contract/ Financing Decision, which will contain specific conditions according to the measure whose objectives are achieved by the project and according to the financing application used.

#### Implementation stage

- Carrying out activities as described in the Financing Request;
- During the implementation, the COFRI experts will carry out at least one on-site verification of the activities mentioned in the Financing Request;
- Verification of the activity report (intermediate or final): a single payment installment can be submitted based on each Activity Report;
- Public procurement;
- Submission of payment requests.



### ***Analysis of the implementation flow of the sub-measure***

Sub-measure 19.2, through its way of defining and determining the scope, presents passive overregulation aspects. The evaluation mechanism at AFRI level has also been replicated at the LAG level, so the project verification stage is doubled. In principle, the idea was for AFRI to verify compliance with the requirements of the regulation and national legislation, and the LAG to verify the impact the project has on the rural environment. In practice, the criteria checked by the two entities are not different, since, given the limited experience the LAGs have in the evaluation, it was recommended that they use the same verification elements that AFRI uses, adding, where appropriate, specific eligibility criteria at local level. Thus, the LAG verification sheet should be much more complex than the AFRI verification sheet, with the LAG being responsible for funding projects that meet the requirements of LDS. In fact, AFRI checks absolutely everything and does not have the flexibility to interpret a project in terms of strategy because of the national rigors.

Sub-measure 19.2 is characterized by the existence of atypical measures, which do not necessarily answer an article of the Regulation defining a measure. The Regulation stipulates that the LAG may introduce measures that meet an objective of the Regulation, not an article defining a measure. Thus, there are situations with totally atypical measures compared to the ones in the NRDP, for which AFRI faces a high burden in the project verification because these projects do not match the AFRI verification grid.

The Leader measure has assimilated the measures in the regulation, using a similar coding. On the other hand, the Leader measure as an approach is not limited to the measures in the regulation, even if the Guide of the Managing Authority for the elaboration of the LAG strategies has imposed a correspondence with the regulation articles. Not being active in Romania, the articles used for the correspondence were not well known. In time, the European Commission's template sheets appeared on those articles, and a misidentification of activities on those articles was identified. So, in the case of articles that are not activated in Romania and are used for the LAG's activities, it is still a matter of understanding correspondence and adequacy, and there are no established procedures covering these articles.

From a procedural point of view, in the case of sub-measure 19.2, the LAG has the responsibility of selecting beneficiaries, thus elaborating a guide for the applicant for its territory, which is approved by CRDC - the regional structure of the MA, and the LAG is also responsible to verify project eligibility and added value (providing the appropriate score). Subsequently, the LAG elaborates the selection report which is accepted by the CRDC, and the beneficiaries are finally notified of the results. The beneficiaries have two options - either submitting projects to COFRI (taking the project from the LAG together with the assessment sheet and the report) or empowering the LAG person to submit the project to COFRI. Once the project is submitted to COFRI, the entire verification process (on eligibility and selection) is again realized.

Consequently, issues related to the eligibility of projects and their selection are analyzed twice (at LAG level and at AFRI level). There have been situations where contracts have been rejected during AFRI verification, as measurement sheets have been inadequately realized in strategies.

At the selection stage, the LAGs have correctly applied the verification methodology (the awarded scores have been adequately provided). There have been cases where the LAGs awarded maximum scores, but when verifying the projects AFRI found inconsistencies between the scores awarded and the aspects declared in



the grant application. In such cases, AFRI only notifies the LAG of the possibility of a missed assessment, with the LAG issuing an errata in the selection report and giving a new score. If the LAG does not agree with the scores awarded by AFRI, it may request to the GDRD of the MA NRDP to reassess the score, thus starting the mediation process.

The verification made by the CRDC on the fiche, guide, documents should include the correct correspondence with the articles, but the CRDCs do not have this competence. This aspect is not done directly by AFRI because the delegation agreement from the NRDP did not include the direct approval from AFRI. The measure sheet provides a higher gradual delegation of tasks to LAGs

In what concerns the possibility that LAGs would be beneficiaries of sM 19.2, they could benefit from funding if the Local Development Strategy identified the opportunity to develop operations of public interest for the community and the territory concerned, for which no other applicant show interest, provided that measures to avoid conflicts of interest are applied at LAG level.

The difficulty is related to the fact that LAG members can not access sub-measure 19.2, as the LAG is responsible for the evaluation process of the submitted projects, and in this case there is a conflict of interest. Thus, attracting many and different actors into Local Action Groups also led to their inability to access the LAG's funding (being in conflict of interests).

**Additional identified requirements (not derived from European and national rules) and potential effects**

<b>Additional requirement</b>	<b>Intensity of requirement on the Applicant / Beneficiary</b>	<b>Intensity of requirement on Relevant Authority</b>	<b>Degree of complexity of the requirement</b>
Double verification of aspects related to eligibility and selection of projects (at LAG and AFRI level)	This aspect affects the duration of the evaluation process.	Duplication of workload for LAG and AFRI employees in terms of evaluating the same projects	
Absence of a clear submission and selection procedure for projects that refer to some atypical measures that do not necessarily answer an article in the Regulation defining a measure	The possibility of occurrence of errors in making the correspondence of the planned activities with the related articles and the possibility of non-approval of the project	The difficulty of realizing the correspondence of the projects with the related articles of the Regulation and the difficulty in establishing additional procedures for their implementation There are situations with totally atypical measures compared to the ones in NRDP, for which there are difficulties in the project verification by AFRI as these projects do not match the AFRI verification grid.	



<i>Additional requirement</i>	<i>Intensity of requirement on the Applicant / Beneficiary</i>	<i>Intensity of requirement on Relevant Authority</i>	<i>Degree of complexity of the requirement</i>
Guidelines and documents elaborated by LAGs for the preparation of calls for proposals should be checked and approved by the MA staff at the level of the County Rural Development Compartments	NA	Regional staff is not sufficient they do not have the same knowledge as an AFRI assessor. For these reasons, the AFRI staff effort is being enhanced to identify inappropriate inconsistencies and inadequacies in the project verification and selection phase.	

### **Actions to reduce the administrative burdens**

The main measures taken to reduce the administrative burden for potential beneficiaries or for project management authorities were:

- In the guideline for elaborating Local Development Strategies e there was initially foreseen the requirement to realize the correspondence of the actions with the articles from the Regulation that aims measures. It was then issued a clarification stating that in cases where actions can not be classified in any of the articles of the regulation, there should be realized a correspondence on objectives, with the condition to meet local needs. At this time, some LAGs have set such measures fiches.

### **Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)**

Until the end of June 2018, 3.244 projects were submitted under sM 19.2, after which 1.865 projects were contracted. Out of these, only 13 were completed and 3 were cancelled.

<b>No. of contracted projects</b>	<b>No. of completed projects</b>	<b>No. of cancelled projects</b>
<b>1.865</b>	<b>20</b>	<b>3</b>

### **Analysis of selection criteria**

The eligibility and selection criteria are taken from the LDS measure technical fiche approved by the GDRD MA NRDP. LAGs have respected the selection principles in the SDL measure sheet.

The eligibility checklist, the selection criteria checklist and the field verification sheet (if applicable) are developed by the LAG and can be made both as separate forms (two or three forms, depending on the LAG option) as well as a single form, covering all the points for the three verification steps.



Eligibility criteria are also checked twice, but in the same way. AFRI has in the manual (for what is applicable at national level) general eligibility criteria, LAGs being able to add their own local eligibility criteria. Local eligibility criteria are taken over by AFRI along with their methodology.

An analysis of the projects submitted under the sub-measure indicates that stimulating innovation is one of the most common objectives of LDS.

### Proposals to reduce the administrative burdens

Stage	Proposals to reduce administrative burdens	Expected effects
<b>Selection</b>	In what concerns the atypical measures, the verification realized by CRDC on the fiche, guideline, documents and the correct correspondence with the articles, but there have been identified differences between the understanding of CRDCs and the one of AFRI. This is not done directly by the AFRI because the delegation agreement from the MA NRDP did not include the direct approval by AFRI.	Such a transfer could have prevented the blockage when the projects arrive at AFRI. The 19.2 procedure could also be simplified in this case (where the approval would have been given directly by AFRI), the LAG making its evaluation sheets, guidelines and methodologies, AFRI approving and using them for the payment of the projects funded under this sub-measure.
	At LAG level, only the impact assessment of projects on LDS should be carried out - prioritization of the projects, while the whole eligibility verification to be checked by AFRI.	Simplify the evaluation process for AFRI representatives.
	Establishing a special structure at the county level, which should be responsible only for LEADER and not for other measures.	Simplify the evaluation process for AFRI representatives.
	Each measure fiche of each LAG should be separately treated, and AFIR should consider them for the LAG projects.	In this case, the CRDCs would still check whether the procedure was transparent, if the animation was carried out, if the selection committee met, and AFRI would check the correct classification, if the minimum compulsory eligibility criteria are included - generally technical issues that AFRI covers when projects arrive at the agency.

**SM 19.3 reparation and implementation of LAG cooperation activities**

**Overview of the submeasure**

<b>Objectives</b>	<ul style="list-style-type: none"> <li>Financing the transnational cooperation projects (between Romania and other European countries) and inter-territorial cooperation (within Romanian territory) between LAGs in Romania and CLLD partnerships (Community Led Local Development) or other partnerships, for example a group of local and public private partners on a rural / urban territory that implements a local development strategy.</li> </ul>
<b>Eligible Beneficiaries</b>	<ul style="list-style-type: none"> <li>Local Action Groups authorized by the MA NRDP for the 2014-2020 programming period.</li> </ul>
<b>Eligible Activities</b>	<p>The non-reimbursable public support is granted for the preparation and implementation of the cooperation projects of the Local Action Groups (LAGs) selected and approved by the GDRD - MS NRDP, within two components:</p> <ul style="list-style-type: none"> <li>Component A - Preparatory technical assistance for selected LAG cooperation projects;</li> <li>Component B - Implementation of cooperative activities of the selected LAGs.</li> </ul>
<b>Procedural Flow</b>	<p><b>Submission stage</b></p> <ul style="list-style-type: none"> <li>Submission of the Financing Request and its annexes</li> </ul> <p><b>Evaluation and selection stage</b></p> <ul style="list-style-type: none"> <li>Checking the eligibility of projects by the MA;</li> <li>Selection of projects by the MA;</li> <li>The selection of the financing request related to the Preparatory Technical Assistance will be carried out by the MA NRDP within a periodic selection system, within a maximum period of 4 months from the date of submission of the project application.</li> </ul> <p><b>Contracting stage</b></p> <ul style="list-style-type: none"> <li>The signature of the contract between AFRI and LAG.</li> </ul> <p><b>Implementation stage</b></p> <ul style="list-style-type: none"> <li>The LAG implements the actions proposed in the Action Plan in maximum 3 months;</li> <li>Elaboration of the activity report;</li> <li>Submission of the payment documentation.</li> </ul>

**Analysis of the implementation flow of the sub-measure**

Sub-measure 19.3, component A, is a new sub-measure, at the level of which only the project submission stage has been carried out until the elaboration of this study, and the contracting, implementation and



payment phases have not yet started. Component B has not yet been launched, being scheduled for the fourth quarter of 2018.

The condition provided in the Applicant's Guide that preparatory support could be accessed by each LAG at a maximum of 2 times a year was introduced following the calculations made by the MA, given that a preparatory support project can not have an implementation period longer than 3 months plus an extension period of up to one month and the necessary time for payment. It is also foreseen that the experts involved in the project of Preparatory Technical Assistance will be part of the LAG staff as it is considered that those already working in the LAG are best suited to realize the preparatory work. This condition refers to the costs of project management that are granted only for the project to be realized by LAG staff, but it does not impose restrictions on participation in actual actions to meet potential partners (in this case the expenses can be also reimbursed to other members of the LAG).

From the perspective of the implementation flow of the sub-measure, it is transparent and very clearly detailed at the level of the Applicant's Guide. As a new submeasure introduced in the program, it did not go through all stages of the implementation flow. The call for proposals on sM 19.3, component A, is open, the first evaluation report being already elaborated.

The institutions responsible for ensuring the procedural flow are the Managing Authority of the NRDP and the Agency for Financing Rural Investment.

**Additional identified requirements (not derived from European and national rules) and potential effects**

Taking into account the state of implementation of this sub-measure at the moment of elaborating this study, no further requirements or issues that could lead to overregulation in sub-measure implementation have been identified.

**Actions to reduce the administrative burdens**

Considering the state of implementation of this sub-measure, no simplification actions have been implemented so far to reduce administrative burdens.

**Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)**

Until the end of June 2018, there were 12 projects submitted under sub-measure 19.3, component A, only the selection stage being completed (no projects under this sub-measure have been contracted yet).

**Analysis of the selection criteria**

At the level of sub-measure 19.3, component A, 2 principles and selection criteria were established, the score given at each sub-criterion being different depending on certain predefined subcriteria. The selection criteria are presented below.

Selection Criteria	Maximum score awarded
SC 1 Principle of complexity of proposed actions	- Maximum 60 points

SC 2 The principle of selecting projects involving more potential partners	- Maximum 40 points
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For the project submission session, open until the end of 2018, 2 selection principles were applied, with the highest weight (60% of the total score awarded) being given to the complexity of the proposed actions, and the maximum score being achieved by the projects which are targeting at least 3 areas of action. At the time of elaborating this evaluation study, an analysis of the effectiveness and relevance of the selection criteria can not be realized as no project sessions have yet been completed under sub-measure 19.3, component A.

### Proposals to reduce the administrative burdens

Considering the fact that sub-measure 19.3 has not yet completed the selection, implementation and monitoring phases, and that there are no beneficiaries of this sub-measure, no actions can be proposed to reduce the administrative burden for these phases. However, it is considered that for this sub-measure it might be useful to use simplified standard costs or even flat rates to simplify the payment procedure for both the beneficiaries and the authorities involved in managing the program.

### sM 19.4 Support for operating and animation costs

#### Overview of the submeasure

<b>Objective</b>	<ul style="list-style-type: none"> <li>Ensuring the operating and animation costs of Local Action Groups (LAGs)</li> </ul>
<b>Eligible beneficiaries</b>	<ul style="list-style-type: none"> <li>Local Action Groups (LAGs) selected and authorized by the Ministry of Agriculture and Rural Development (MARD) through the Rural Development General Directorate (GDRD) - Managing Authority for the National Rural Development Programme (MA NRDP) for the programming period 2014 - 2020.</li> </ul>
<b>Eligible activities</b>	<p>The eligible activities are those related to the operation and animation of LAGs. The categories of expenditure covered by the support are:</p> <ul style="list-style-type: none"> <li>Staff costs;</li> <li>Expenditure on technical and financial consulting services, expertise in LDS implementation and audit;</li> <li>Logistic, administrative and travel expenses for LAG operation;</li> <li>Expenditure on training and development of skills related to LDS implementation;</li> <li>Costs for animation;</li> <li>Expenditure for local holidays, thematic festivals, traditional product fairs and other events promoting the LAG's territory.</li> </ul>
<b>Procedural flow</b>	<p>Selection stage</p> <ul style="list-style-type: none"> <li>The Selection of Local Development Strategies is the responsibility of the GDRD – MA NRDP and finalizes through the publication of the Final Selection Report;</li> </ul>



- Elaboration of operating authorizations: Each selected LAG will sign, at the level of the RCRIF to which it belongs, a Framework Financing Agreement and three subsequent Subsidy Financing Agreements.

#### Contracting stage

- Signing of the Financing Framework Agreement: The LAG has the obligation to submit a set of documents to RCR, at least 10 days before the deadline for signing the Financing Framework Agreement and the first Financing Agreement. After submitting the documents and the final annexes, AFRI and LAG will sign the Framework Financing Agreement.
- Modification of the Financing Framework Agreement: The Beneficiary will submit to COFRI an Explanatory Note, detailing the beneficiary's requests, together with their justification. Documentary evidence for each requested modification shall be provided.
- Three grant agreements will be signed based on the Financing Framework Agreement.

#### Implementation stage

- The first Financing Agreement will be signed in parallel with the signature of the Financing Framework Agreement and will cover an implementation period between the date of signature and until 31.12.2019, plus a maximum of 30 days for the submission of the last payment dossier and, in addition, 90 days for the payment;
- The second Financing Agreement will cover an implementation period from the beginning of 2020 to 31.12.2021, plus a maximum of 30 days for the submission of the last payment file and, in addition, 90 days for the payment;
- The last Financing Agreement will cover the period from the beginning of 2022 to 31.12.2023 (including the maximum 90 days required for the last payment) and will have a minimum allocation of 10% of the total amount of the Financing Framework Agreement.
- Public procurement implementation according to the legislation in force.
- Submission of the payment request: The beneficiary may request payment of an advance (no more than 50% of operating and animation costs), and the following payments will be made based on the approved activity reports.

#### Monitoring and verification stage:

- Verification of the implementation of activities: the beneficiary has the obligation to communicate, through an address, to the COFRI the exact dates of organizing the events. Field checks by COFRI will be made prior to submission of the Activity Reports by the beneficiary.
- LDS Monitoring: As regards the monitoring of sub-measure 19.2 implementation at the LDS level, the LAG has the obligation to elaborate a cumulative centralized situation on a monthly basis.

### **Analysis of the implementation flow of the submeasure**

Sub-measure 19.4 has an atypical implementation flow, as it provides support for the LAG's operating and animation costs.

A Procedural Manual for the implementation of sub-measure 19.4 "Support for operational and animation expenses" has been elaborated for the adequate implementation of the submeasure. The purpose of the Procedural Manual is to provide to AFRI staff specific responsibilities in the implementation of sub-measure 19.4, at national, regional and county level, the necessary methods for the effective implementation of this sub-measure. The manual describes the AFRI working procedure on the division of tasks and responsibilities between the structures and bodies involved, the forms and documents used, and the deadlines to be respected. The procedure defines the activities of the services involved at COFRI, RCRIF and AFRI level in order to successfully implement the sub-measure 19.4. The procedure establishes the procedural steps related to the contracting and implementation phases of the legal commitments related to this sub-measure.

The implementation of the sub-measure is based on the conclusion of a framework agreement and three subsequent agreements between the AFRI and the LAGs, targeting the activities carried out at the LAG level in certain predetermined time periods. The financing contracts cover the operating and animation costs of LAGs, such as: staff costs; expenditure on technical and financial consulting services, expertise in LDS implementation and audit; logistical, administrative and travel expenses for the functioning of the LAG; expenditure on training and developing skills on LDS implementation; animation expenditures; expenditures on local festivals, thematic festivals, traditional product fairs, and other events promoting the LAG's territory.

The contract concluded by AFRI with the LAGs for operating expenses (and also at the level of authorization issued by the MA NRDP) does not clearly stipulate a penalty system if they do not comply with / maintain the eligibility criteria.

In what concerns the conditions for cost reimbursement, it is worth mentioning that there is a threshold of 3.5 % (this ceiling being later modified) for expenditure on accountancy and accounting expertise as well as for auditor's expenses that has been established based on the contracts of the last programming period.

### **Additional identified requirements (not derived from European and national rules) and potential effects**

No additional issues that may constitute overregulation have been identified.

### **Actions to reduce the administrative burdens**

The main measures taken to reduce the administrative burden for potential beneficiaries were:

- Integration of costs of 3% of the eligible project cost to cover audit service expenditure: Initially, the auditor provided a 3.5% threshold regardless of the results of the AFRI verifications on project expenditure; subsequently, because these costs were attributable only to the beneficiary, it was recommended that the audit spending be leveled at 3% of the amount of declared eligible expenditure.



**Analysis of the situation of the projects contracted at the end of June 2018 (to what extent the simplifications provided in the NRDP favored the implementation of the program)**

Până la finalul lunii iunie 2018, au fost încheiate 239 de contracte, care se află încă în implementare, și care au o valoare totală contractată de 69.932.383,73 lei.

By the end of June 2018, 239 contracts have been signed, which are still under implementation, and have a total contracted value of 69.932.383,73 lei.

No. of contracted projects	No. of completed projects	No. of cancelled projects
239	0	0

**Analysis of selection criteria**

Under Submeasure 19.4 no selection criteria are provided.

The support under this Sub-Measure is granted for the operating costs and animation activities of the Local Action Groups (LAGs) selected and authorized by the Ministry of Agriculture and Rural Development through the Rural Development General Directorate - Managing Authority for the National Rural Development Program (GDRD MA NRDP) for the programming period 2014-2020.

**Proposals to reduce the administrative burdens**

Stage	Proposals to reduce the administrative burdens	Expected effects
<b>Selection</b>	N.A.	
<b>Implementation</b>	For this sub-measure, simplified standard costs could be useful	This would reduce the administrative burden on beneficiaries at the stage of preparing the payment files, but also on the AFRI staff responsible for checking the documents and expenses required for payment.
<b>Monitoring</b>	N.A.	



## VI. Answers to the evaluation questions

### 1. What are the national provisions that generate overregulation in the implementation of NRDP at the general level and for each sub-measure for the beneficiaries, on the one hand, and for the authorities, on the other?

The answer to this evaluation question is largely based on the interpretation of the term "overregulation", which was adopted during the implementation of this study, in accordance with the requirements foreseen in the terms of reference. The "overregulation" refers to those rules/ requirements/ procedures established in the NRDP implementing instruments (guides, forms, procedures, etc.) that do not result from the corresponding obligations established in the European regulations or in the general national legislation, which are not related to the programming options derived from the NRDP document, and which are not justified under the general principles of regularity and sound financial management of EU funds.

In other words, overregulation refers to those rules/ requirements/ procedures that are under the direct control of the NRDP management system and whose existence is not sufficiently justified.

Starting from the above detailed definition, the impact of the overregulation on the implementation of the National Rural Development Program 2014-2020 has been assessed as relatively small, the examination of the issues arising from the analysis of the European and national legislative framework as well as of the data resulting from the application of the quantitative and qualitative research methods, without indicating elements affecting the implementation of the program as a whole. The NRDP procedures applicable to several sub-measures are generally based on EU or national legislation or are in any case justified by the principles of transparency, regularity and sound financial management. In addition, several innovations - described in more details in the answer to the evaluation question 4 of this section - have been introduced at the level of procedures compared to the previous programming period in the direction of simplifying the implementation.

The only aspect with a cross-cutting impact on the overall implementation of the program is related to the large number of documents (e.g. certifications, opinions issued by experts needed to analyze the projects) from various public administration bodies that the applicants/beneficiaries must obtain and provide in the application/pre-contracting or implementation phases. There is a general level of dissatisfaction amongst stakeholders regarding the number and frequency with which these documents should be presented. In some cases, the documents were not considered necessary or relevant to certain project categories (such as denial requests from certain public institutions). Applicants/ beneficiaries generally request the further development of inter-institutional protocols to enable the program management system to obtain the necessary information directly from the relevant public issuing bodies, thus generating significant time and resource savings for both them and for the staff of the authorities involved in the program management system. Although significant improvements have been made in this direction, protocols already signed with



relevant administrations (eg the National Sanitary Veterinary and Food Safety Authority, the Ministry of the Environment) have still required a more general approach at program level to increase efforts in this direction and to generate further improvements.

At a more specific level, the analysis highlighted a number of point-specific overregulation elements, either characteristic of a single sub-measure or, in some cases, applicable to several sub-measures.

In the following paragraphs, these situations will be briefly presented which, in the opinion of the evaluators, are of the utmost importance both in terms of the impact of the requirements on the implementation of the sub-measure(s) and the possibility of their simplification. Corresponding recommendations to improve these situations are then presented in the answer to the evaluation question 3.

- Sub-measure 1.1. "Support for vocational training and skills acquisition": the analysis (based on issues that emerged through the use of data collection and validation tools) revealed that during the monitoring the training courses, providers have the obligation to ensure the installation of the video cameras at the location of the courses to ensure the possibility of verifying (by live streaming) the way of deployment, as well as the degree of attendance. This type of monitoring was considered by the providers to be difficult, and also, in the opinion of the evaluators, an original but potentially invasive approach. It is recommended to consider, in particular for the next programming period, alternative ways of monitoring the courses (eg photos accompanying attendance lists, IT applications dedicated to data collection on the participants in the activities - as used in case of the Veneto region). In this respect, we mention the implementation of the sub-measure 1.1. at the level of the Republic of Ireland where the provider has organized three separate training sessions at the regional level by contacting the final beneficiaries by post or telephone to confirm the participation. At the end of the training sessions, the final beneficiaries were financially compensated for their participation (an element that encouraged participation). The participants have also compulsorily completed feedback forms based on which the provider has made an assessment of the effectiveness of the courses. At the level of control, the Managing Authority pursued an on-site inspection approach (through random selection of suppliers) and verification of the Farm Improvement Plans for participants (plans developed by farmers on the basis of activities supported through Measure 1). At the level of 2016, more than 24.000 people were trained (target established to be achieved by the year 2023 being 35.000 people) and the graduation rate was 97.5%<sup>17</sup>.
- In the case of sub-measures 4.1 "Support for investments in agricultural holdings" and 4.1a "Support for investments in fruit holdings" certain documents requested to be submitted at the submission stage (documents of a public nature) could be obtained directly by AFRI on the basis of inter-institutional protocols. This option could reduce the administrative burden experienced by applicants. However, the simplifications already made and the structure of the funding schemes have led to a high rate of access (and a reduced number of cancelled contracts). In comparison, at the level

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<sup>17</sup> Department of Agriculture, Food and the Marine (2017): The 2017 Evaluation on the Implementation of Ireland's Rural Development Programme 2014-2020, pp. 17-24.



of NRDP of the Republic of Ireland, the number of applications for sub-measure 4.1 was strongly influenced by the nature of the approval and payment system, between these two phases existing a long period of time. For this reason, the number of completed investments for which payments were made was well below the targets.

- In the case of sub-measure 4.3 "Investments for the development, modernization or adaptation of agricultural and forestry infrastructure", the complexity of the process of assessing the financing requests could be reduced by setting a minimum monthly threshold sufficiently high to prevent the submission of a large number of projects (including in the first month of continuous submission), which can generate an administrative burden on institutions involved in the evaluation process. The verification of all financing requests submitted during a session launched even when the total public value of the submitted projects, which have an estimated score higher than or equal to the quality threshold for that session, exceeds the 200% threshold of the allocation/ session, generates an inefficient effort for the management system. At the same time, the request for the submission of certain permits requiring longer production terms (e.g. those listed in the urbanism certificate) may require additional efforts for applicants.
- At the level of sub-measure 6.1 „Young farmers installation” the analysis indicated the opportunity to modify the monitoring plan regarding the stage of implementation of the business plan, allowing for the possibility to make changes to the business plan depending on the specifics of the market or the current situation development, while respecting the overall objectives.
- In the case of sub-measure 6.2 "Support for the establishment of non-agricultural activities in rural areas", the verification of compliance with the eligibility and selection criteria both at the project evaluation stage and in the pre-contract stage (carried out in previous sessions prior to the first payment) represent an overregulation element, given that the time interval between the two stages is relatively low and the probability of significant changes is reduced. For this sub-measure, but also as a general principle (also applicable to sub-measure 6.5), repeated verification of documents that do not undergo substantial changes over time and can be analyzed in a single step can generate an additional inefficient administrative effort.
- At the level of sub-measure 6.3 "Support for small-scale farms development", requesting supporting documents (particularly negatives), without taking into account project specificities, can be considered as an additional administrative burden for applicants.
- In the case of sub-measure 6.4 "Investing in the creation and development of non-agricultural activities", the condition for realizing procurement procedure, including for ineligible works within a project, can be considered as a restriction affecting the financing of more complex projects whose added value in the environment rural can be bigger.
- At the level of sub-measure 7.2 „Investiții în crearea și modernizarea infrastructurii de bază la scară mică” , the request for the submission of denials by the relevant public authorities was considered as an element of overregulation, while under sub-measure 7.6 "Investing in the creation and development of activities non-agricultural "classification of tourism areas and the concentration of funding towards them is an approach that can help deepen the gap between economically advanced and less developed regions.



- Sub-measure 19.2 "Support for the implementation of actions under the local development strategy": the analysis highlighted an important phenomenon of duplication of procedures related to the eligibility assessment and the selection of project proposals submitted by beneficiaries to Local Development Strategies under the LEADER approach. The proposals are first evaluated by the LAGs and then by AFRI, without a clear division of competences between the two levels, repeating the same type of evaluation and making the first-level assessment useless. This is a situation of overregulation because it generates an unnecessary evaluation of project proposals, on two levels, which affects the speed of implementation and ends with an additional administrative burden for beneficiaries and for the program management system. In comparison, the Irish Rural Development Program foresees that LAGs develop monitoring and evaluation plans for their own local development strategies, with annual reporting to the managing authority of the assessment reports showing the targets achieved in the reporting period, priorities for the next period, and case studies on projects implemented on different funding themes. In order to support the LAGs in financing management, the Managing Authority also carried out a series of training courses on the operational rules of the Rural Development Program.

**2. To what extent the eligibility criteria, the other commitments set out in the measure sheets and the selection principles and criteria favored the submission of projects that contribute to the objectives of the strategy while maintaining an acceptable level of administrative burden at the level of beneficiaries on the one hand, and authorities, on the other? Can a reduction of these requirements be achieved while maintaining the same effect in achieving the objectives of the strategy?**

In general, the eligibility and selection criteria (where applicable) applied in the implementation of the NRDP were considered to be in line with the achievement of the objectives of the strategy, while maintaining an acceptable level of administrative burden for beneficiaries and for the bodies involved in the management system. Both the eligibility criteria and the selection criteria are set out in a participatory way, involving in concrete terms the participation of the Monitoring Committee and its working groups. Changes during the programming period demonstrate constant attention from the management system in ensuring the attractiveness of the sub-measures and an appropriate level of absorption of allocated resources.

All the criteria were considered to be in line with the strategic and operational objectives of the interventions. An important role is played by the innovative selection procedure adopted with the new programming period, based on the "first come, first served" principle with a qualitative threshold for ongoing calls for proposals and monthly evaluation sessions. The approach is based on a prior assessment of the applicant, against a minimum quality threshold set by the MA on a monthly basis. This system seems to be unanimously appreciated for its ability to select the best applications, while guaranteeing a remarkable speed of the selection phase. With some limited exceptions linked to cases where the threshold in the first monthly sessions has been set too low, the system does not appear to overburden, from the evaluators perspective, the bodies responsible for the enforcement of the procedure. On the contrary, the distribution of the





selection task over the year corresponds to the organizational needs of the intermediary bodies, and the possibility to flexibly limit the closing time of the selection process, if necessary, works and is appreciated.

The analysis has revealed some specific issues at the level of certain measures / sub-measures, which need to be addressed in the future:

- The eligibility criteria related the population covered by local authorities that may have access to the basic infrastructure sub-measure (SM7.2 - for the water/ waste water infrastructure component) requiring a minimum threshold of 2000 equivalent inhabitants. Although this threshold has been agreed with the European Commission services in the context of the ex-ante conditionalities for the Partnership Agreement, it generates the risk of an unbalanced development of rural areas which does not correspond to the overall strategic objectives of the NRDP;
- Difficult accessing criteria in the case of certain packages under Measure 10 (especially Package 5) that are inconsistent with the capacity of the potential applicants (generally small farms) lead to a low attractiveness of the support offered. Required in some cases by the European Commission, these requirements need a reassessment in order to achieve a satisfactory impact of the packages at the target group level.

### **3. To what extent and by what means can the administrative burden generated by overregulation be reduced without any negative consequences on the implementation of the NRDP?**

Addressing the issues outlined in the answer to the first evaluation question as being more important in terms of impact and simplification, the evaluators considered that the associated administrative burden could be reduced by applying the following recommendations:

- Organizing a participatory process - involving relevant stakeholders and representatives of beneficiaries / applicants - to assess the usefulness and relevance of each government supporting document in the implementation, contracting and implementation phases currently required by the procedures in place. As far as possible, the analysis should be done taking into account the different types of projects and sectors of activity applicable within the same sub-measure, and documents finally identified as unnecessary or irrelevant should not be required.
- Continue and intensify efforts to establish collaboration protocols with different public administration bodies, in order to minimize the administrative burden on beneficiaries in procuring and filing these documents. Efforts in this direction should be taken at program level in order to achieve protocols covering the full range of sub-measures of the NRDP. As far as possible, the protocols should provide the possibility that MA, AFRI and APIA directly access and interrogate relevant databases of public bodies involved instead of generating a direct document transmission channel on paper between these bodies and the NRDP management system.
- Depending on the relevance of the certifications concerned, the frequency of their requests by the intermediary bodies - or the verification of the related database when established - should be reduced to a minimum; verifying public information only by sampling can also be taken into account for specific cases characterized by a low risk of irregularities or errors.





- The role and functions of LAGs in the submission and selection phases of sub-measure 19.2 should be reviewed for the next programming period so as to be complementary and integrated into the overall implementation flow. This can be done in two ways:
  - Either by fully delegating to the LAG the responsibility for assessing eligibility and selection of applications, based on the procedures and models previously approved by the program's central management system, in line with the practice adopted in other Member States, which is indeed characterized by several structures and institutionalized LAGs;
  - Either by limiting the role of LAGs clearly by nominating them as a prioritization factor for applications according to their degree of relevance to the local development strategy. In this way, eligibility assessment and selection (taking into account the prioritization of LAGs) should be under the responsibility of the central management system of the program. This solution, different from the first one, would not be fully in line with the spirit of progressive empowerment of the localities typical of the Leader approach; however, this seems more feasible in the short term, taking into account the characteristics of the LAGs in Romania in terms of size, experience and institutionalization.

#### 4. To what extent have the simplifications provided in the NRDP favored the implementation of the program?

Both compared to the previous programming period and to the start of the current period, several simplification measures have been adopted to facilitate the effective implementation of the NRDP. Their impact has largely depended both on the timing of the measures and on their nature. Thus, the introduction of measures earlier during the programming period, which mainly focused on the submission stage, facilitated the recording of a high degree of access to funding, while the simplifications that facilitated the implementation of the projects reduced the difficulties formerly encountered by the beneficiaries.

In this respect, two main categories of simplification measures can be identified:

- Procedural simplifications aimed at reducing the number of supporting documents or phase-out at which the documents must be presented - generally focusing on the simplification of the filing stage:
  - This type of simplification targeted in particular sub-measures 1.1 4.1, 4.2, 6.1, 6.2, 6.4, 7.2, 13 (facilitating in this case the identification of eligible areas through IPA online announcements) and 19.1 (by making meetings and events through the involvement of the NRNR and NFLAG in order to clarify the technical aspects among the potential beneficiaries);
- Procedural simplifications that focused on the process of implementing projects and reducing the administrative burden faced by beneficiaries:
  - This type of simplification included the introduction of a standard unit cost option (sM 1.1, 4.1a for certified material), the possibility of reducing the economic size of funded holdings with a margin of maximum 15% (sM 4.1, 6.1, 6.3), the introduction of standardized procurement procedure sheets (in the case of sM 4.3 - the observed effect being the reduction of the cases



where financial corrections were applied), the adaptation of the calls according to the reality on the field (4.1a being allowed to test the varieties outside the borders as well acceptance of inferior varieties for which difficulties in identifying certified material have been encountered, with sM 6.2 accepting the possibility of renouncing land acquisition) and simplifying monitoring (by removing progress reports from payment procedures in the case of sM 4.3 as well and by reducing the obligation to comply with the basic requirements for non-farmed areas in the case of sM 10.1).

**5. To what extent have the simplifications provided in the NRDP reduced the administrative burden at the level of the beneficiaries, on the one hand, and the authorities, on the other?**

The implementation of the NRDP 2014-2020 was characterized by several simplification measures both at the beginning of the current implementation period compared to the previous period and those adopted during the current implementation period as part of a continuous simplification effort.

The analysis of each sub-measure, in Chapter V, highlights the most relevant simplification measures adopted, their impact on implementation and their effects in reducing the administrative burden on beneficiaries and authorities.

Among the most relevant measures adopted, which have led to important consequences for the program implementation, the following should be mentioned:

- Adopting the standard unit cost option when the feature of the targeted initiative allows. The impact of such a solution is obvious and is not limited to reducing the administrative burden: the adoption of the standard unit cost tends to increase the attractiveness of the sub-measures and has an impact on the rate of absorption and the speed of implementation;
- Adopting the new selection approach based on pre-scoring and continuous submission call for proposal that may have monthly / quarterly quality thresholds, which, in addition to simplifying the application and selection phase, have made program implementation more regular, constant and easier to monitor;
- Adopting the on-line submission procedure is another simplification measure for which the impact is not limited to a simple reduction in the administrative burden but extends to the ability of the program to be implemented quickly and efficiently by considerably increasing the attractiveness of the tools created for the applicants.

The impact of these measures regarding the fast, reliable and effective implementation of the NRDP can be further improved by extending their application in the future and to other measures/sub-measures not yet covered by their scope.

For example, there are still sub-measures for which the electronic submission of documents is not foreseen (e.g. sub-measures related to measure 19), and the option to use standard unit costs is appropriate to be extended to sub-measures not currently foreseen (such as example sM 1.2, 19.1, 19.3, 19.4).



The positive impact of other simplification measures on the implementation of the NRDP is disputed in some cases. One such example is to simplify the process of submitting the financing requests. Thus, in order to ease the administrative burden at the submission stage, AFRI postponed the mandatory submission of certain documents annexed to the grant application for the contracting or even the project implementation stage. This may, in the view of the evaluators, generate the risk of postponing specific problems for a later stage, where the consequences for the implementation of the program may be even stronger, causing the need for revocation of funding and the recovery of undue amounts.



## VII. Conclusions and Recommendations

Starting from the definition for the concept of "overregulation", referring to the rules/requirements/procedures that are under the direct control of the NRDP management system and whose existence is not sufficiently justified, this analysis did not identify important aspects of overregulation which will affect the implementation of the NRDP 2014-2020 as a whole. The NRDP procedures applicable to several sub-measures are generally grounded in EU or national legislation (or reflect aspects decided at the programming stage), or are in any case justified by the principles of transparency, regularity and sound financial management. However, a cross-cutting aspect that is required at the level of beneficiaries is the large number of documents (e.g. certifications, opinions, expert opinions) from different public administration institutions that applicants/ beneficiaries need to obtain and to provide them in the submission / pre-contracting or implementation phases.

According to the details provides for the evaluation question no. 1, it is however necessary to develop additional inter-institutional protocols to allow the program management system to obtain from the relevant issuing institutions the information necessary for the assessment of eligibility or compliance with selection criteria. Reducing the number of supporting documents requested from potential beneficiaries can save time both for them and for the staff of the authorities involved in the program management system. At the same time, extending the possibility for electronic submission of applications for all sub-measures (similar to the model applied in the Veneto region and the Tuscany region), as well as developing an electronic module for contracting and implementation phases, would also reduce the administrative effort and an efficacy both at the level of the communication process between authorities and beneficiaries and at the level of the monitoring of projects. At the moment of elaborating this study, AFRI has started to implement the online submission of payment requests. Completing the process of developing this module by the end of the current programming period as well as establishing from the beginning of the next multiannual financial year a series of events aimed at familiarizing potential beneficiaries with the functionalities of the available electronic tools could significantly contribute to the smooth implementation of the next program of rural development.

Another cross-cutting aspect that emerged from the analysis was the legislative changes that had a major impact on program beneficiaries. In this respect, the need for inter-institutional consultations prior to the implementation of legislative changes with impact on the beneficiaries of NRDP, as well as the need to carry out impact analyzes before amending the legislative framework so as not to affect the implementation of the program or to generate additional administrative burden or even risks for the beneficiaries of the NRDP. In this respect, a relevant example was represented by Order no. 119/2014 for the approval of Hygiene and Public Health Standards in the living environment of the population, which has led to the risk of losing funding for small scale breeders. Continuing the Managing Authority's involvement in discussing future changes to this Order as well as other national regulations that impact on ongoing projects (as well as future ones) is essential to avoid generating such risk situations that may affect the confidence of potential beneficiaries in



the program. Also, in order to increase the predictability of the program, it is recommended for the next programming period to establish and publish, in the last quarter of a year for the entire period of the following year, an estimated timetable for the launch of the funding sessions.

Continuing the general recommendations, based on the observations made at the level of the chapter V, a brief description of specific procedural simplification suggestions for the NRDP 2014-2020 sub-measures is presented below:

### Recommendations:

#### Submeasure 1.1

- Considering the additional burden for the beneficiaries to install video equipment at the training location, in order to verify the actual implementation, it is advisable to consider alternative monitoring options (eg, random contact and interviewing the participants). At the level of other rural development programs, for instance, as demonstrated by the benchmark analysis, IT tools dedicated to collecting data on participants in training (implemented, for example, in the sub-measure 2.1 at the level of the Veneto region).

#### Submeasure 1.2

- Introducing the possibility of using standard unit costs in order to mainly reduce the effort in analyzing and verifying supporting documents for the costs per participant/ information day. The solution for reimbursement of costs based on standard unit costs under Regulation (EU) 1303/2013 as amended and supplemented subsequently (Article 67) is applicable to both Ireland and the Veneto region.

#### Submeasure 2.1

- Implementing the submeasure by using calls for project proposals to encourage access to it, as well as better coordination and synchronization with other NRDP measures.

#### Submeasure 4.1

- Reducing the administrative burdens in the reporting process, through the elimination of the obligation of beneficiaries to submit supporting documents of a public character (e.g. balance sheets, tax returns, land books, APIA declarations etc.). At the same time, for the next programming period, it is recommended to consider at the stage of filing the solution applied at the level of the Toscana region, which aimed to simplify this phase by creating stages. Thus, the grant application form contains only elements necessary to determine the eligibility and contribution to the investment, facilitating the achievement of a hierarchy of projects (in projects that can be financed under the allocated funds, projects that can not be funded by lack of resources and unsupported projects).

#### Submeasure 4.3

- Given the very high interest in this sub-measure, it is recommended to improve the prescoring system (by setting a higher minimum monthly quality threshold to reduce the high workload imposed by the

application verification), and the restructuring of the selection criteria in order to ensure a better division of projects (especially for the agricultural component of the sub-measure). Also for the the sub-measure 4.3. it is recommended to consider the simplification option for the application phase, similar to the option applied in the Tuscany region in case of sub-measure 4.1 as revealed by the benchmark analysis.

- Requesting the submission of the approvals included in the urbanism certificate at the contracting stage (and not at the submission stage) in order to facilitate the process of preparing the application file.
- Online submission of payment requests and online execution of the approval process of award documents submitted by the public beneficiaries to reduce the time of the proceedings. With regard to this recommendation, AFRI has started the implementation of such a dedicated electronic module.

#### Submeasure 6.1

- The possibility for the beneficiaries to operate minor changes (depending on the specificity of the market or the current state of development) regarding the implementation of the business plan in compliance with the objectives and targets assumed (also applicable in the case of sM 6.3).

#### Submeasure 6.2

- Avoid re-checking at the pre-contracting stage of documents submitted by the beneficiaries at the stage of submission of the application, checking that the eligibility and selection criteria are maintained could be realized by providing a self-declaration.

#### Submeasure 6.3

- In order to avoid limiting the access of potential beneficiaries to this type of funding, it is recommended to reformulate the condition to demonstrate the residence / registered office and work place at the level of the same administrative-territorial unit where the holding is registered so as to allow the placement in adjacent areas as well (eg up to 50 km). This recommendation is currently being addressed by AFRI.
- Identification of relevant endorsements and supporting documents according to the specificity of the projects and their request accordingly, avoiding the request for the submission of denials from the public authorities.

#### Submeasure 6.4

- Realizing a synergy with Measure 2 of the NRDP 2014-2020 to support beneficiaries through counseling services in the development of business plans.
- If it is decided to implement a similar measure in the next programming period and to maintain the additional scoring of developed projects involving craft activities, it is advisable to have a clearer definition of craft activities in the national legislation in order to ensure a more transparent scoring.

#### Submeasure 6.5

- If it is decided to implement a similar measure in the next programming period, it is recommended to increase the period of support, as well as the granting of a fixed amount per hectare which is not





conditional upon a payment made to APIA and a target year of access to the Pillar I schemes to increase the interest in this sub-measure and even its accessibility.

#### Submeasure 7.2

- In order to reduce the administrative burden for applicants, it is recommended to eliminate the requirement for the submission of denials by public institutions for projects where notices such as hygiene and public health, for example, do not apply. In this regard, an exhaustive list of opinions to be submitted according to the conditions specified in the relevant national legislation could be elaborated on the basis of inter-ministerial consultations. **This recommendation has a cross-cutting application.**

#### Submeasure 7.6

- Regular updating of the analyzes regarding the tourism potential of the regions of Romania as well as considering the possibility of a distinct financial allocation for rural and mountainous rural areas in order to ensure a balanced access to financing.
- Granting a unitary support regardless of the applicant category, increasing the chances of selecting those projects that have the greatest impact at local level, regardless of the beneficiary organization (ATUs, NGOs, cult units, etc.) .

#### Agroenvironment and climate measures

- Developing an information and counseling system on which beneficiaries can better understand their commitment obligations (applicable to M10 and 11).

#### Submeasure 8.1

- Modification of the procedural flow through independent over-control and concomitant with the verifications carried out by the other involved institutions (eg APIA that performs the cross-compliance observation, ie FG that performs on-the-spot verifications of the setting up, fencing, maintenance and care of the plantation) in order to reduce the control period.

#### Submeasure 15.1

- Clarify the separation of the responsibilities of APIA and FG in order to avoid duplication of the process of verifying that the eligibility criteria are met by the applicants (eg verification of the holding of a forest management contract or services with a forest detour for the forest areas for which it is requested the support) and compliance with the procedural deadlines for the evaluation and selection phases.
- Developing a common inter-institutional approach to how to identify and demarcate the layout units it is useful to develop a common IT platform accessible to both the institutions involved in the implementation of the sub-measure and the beneficiaries to facilitate the declaration, updating and verifying the information related to the commitment.



## Leader Measure

- Allowing the allocation of a percentage of votes among the partners in proportion to LAG involvement and contributing to LDS development (in sM 19.1). As it has emerged from the benchmark analysis carried out at the level of the Tuscany rural development program, each LAG member can join in any share of voting rights, the distribution of voting rights among members being negotiated and established in the statute, and or in the founding agreement.
- Replacing the redemption mechanism with the simplified unit cost option (or even lump sums in sM 19.3), in order to simplify the payment procedure - similar to the option applied to the Veneto region, and to develop IT solutions that allow for the online submission of payment requests (sM 19.1 and 19.4).
- Delegating to AFRI the approval of the evaluation sheets, guidelines and methodologies developed by LAGs for atypical measures, in order to eliminate the blockage encountered in the payment stage (in sM 19.2).



## VIII. Annexes

- **Annex 1.** Benchmarking analysis
- **Annex 2.** Interpretation of the data collected from the application of the questionnaires among the beneficiaries of the NRDP 2014-2020
- **Annex 3.** European and national regulations