

Synthesis of *ex ante* evaluations of CAP post 2020

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Table of contents

| | |
|---|----|
| List of acronyms | ix |
| Acknowledgements | x |
| Executive summary | xi |
| Introduction | 1 |
| Performance, Evaluation and Monitoring Framework of the CAP 2023-2027 | 1 |
| Overview of the <i>ex ante</i> evaluation process | 2 |
| 1. Methodological approach | 4 |
| 1.1 Methodological approach for the synthesis | 4 |
| 1.1.1 Scope of the synthesis | 4 |
| 1.1.2 Information sources | 6 |
| 1.1.3 Type of data: qualitative and quantitative | 6 |
| 1.1.4 Analytical framework of the synthesis | 7 |
| 1.1.5 Indicators | 10 |
| 1.1.6 Collection of data and quality checks | 13 |
| 1.1.7 Dealing with data gaps and missing data | 15 |
| 1.2 Methodological approach for the appraisal | 16 |
| 1.2.1 Scope of the appraisal | 16 |
| 1.2.2 AQ1: To what extent are the <i>ex ante</i> evaluation reports complete, comprehensive and coherent? | 16 |
| 1.2.3 AQ2: To what extent was the <i>ex ante</i> evaluation carried out following an effective process? | 17 |
| 1.2.4 AQ3: To what extent did the lesson learned influence and shape the CSP? | 17 |
| 1.2.5 AQ4: What good (<i>ex ante</i>) evaluation practices can be identified across Member States? | 17 |
| 1.3 Additional activities undertaken | 18 |
| 1.3.1 Focus group with evaluators | 18 |
| 1.3.2 Targeted survey with MAs | 19 |
| 1.3.3 Other activities | 19 |
| 2. Analysis and synthesis of the evaluation themes | 20 |
| 2.1 Assessment of the context and needs | 20 |
| 2.1.1 SQ1: To what extent is the context and SWOT analysis based on recent evidence and does it take into account experiences gained from implementing the CAP in previous programmes? | 20 |
| 2.1.2 SQ2: To what extent are the needs well defined, prioritised and based on evidence from the context and SWOT analysis? ... | 24 |
| 2.1.3 SQ3: To what extent is the use of financial instruments financed by the EAFRD justified? | 27 |
| 2.2 Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) and consistency of the allocated resources as well as the suitability of the selected targets and milestones | 30 |
| 2.2.1 SQ4: To what extent do the designed interventions respond to the identified national and regional needs? | 30 |
| 2.2.2 SQ5: To what extent are the CSP interventions, their eligibility conditions, definition and conditionality requirements consistent with each other and work in synergy to achieve the objectives coherently? | 32 |



| | | |
|------------|---|-----------|
| 2.2.3 | SQ6: To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs? | 35 |
| 2.2.4 | SQ7: To what extent are the CSPs coherent with other policies, including but not limited to EU policies, national and regional policies? | 38 |
| 2.3 | Assessment of the expected outputs, results and impacts of CSPs | 41 |
| 2.3.1 | SQ8: To what extent will the expected outputs contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD? | 41 |
| 2.4 | Assessment of the measures planned to reduce administrative burden | 45 |
| 2.4.1 | SQ9: To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries? | 45 |
| 2.5 | Assessment of horizontal themes | 48 |
| 2.5.1 | SQ10: To what extent do the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy? | 48 |
| 2.5.2 | SQ11: To what extent does the CSPs' environmental and climate architecture contribute to achieving environmental and climate ambition? | 50 |
| 2.6 | Identification of common trends at the European level | 54 |
| 2.6.1 | Assessment of the context and needs | 54 |
| 2.6.2 | Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) and the consistency of the allocated resources as well as the suitability of the selected targets and milestones. | 54 |
| 2.6.3 | Assessment of the expected outputs, results and impacts of programmes/plans | 54 |
| 2.6.4 | Assessment of the measures planned to reduce administrative burden | 55 |
| 2.6.5 | Assessment of horizontal themes (such as contribution to Green Deal and Farm to Fork Strategy objectives) | 55 |
| 3. | Appraisal of the <i>ex ante</i> evaluation reports | 55 |
| 3.1 | AQ1: To what extent are the <i>ex ante</i> evaluation reports complete, comprehensive and coherent? | 55 |
| 3.1.1 | To what extent are the <i>ex ante</i> reports complete? | 55 |
| 3.1.2 | To what extent are the <i>ex ante</i> reports comprehensive and coherent? | 62 |
| 3.1.3 | To what extent is the <i>ex ante</i> evaluation specific and considers the specific requirements for certain objectives? | 64 |
| 3.1.4 | To what extent were the <i>ex ante</i> evaluations able to evaluate the contributions of the CSPs in achieving the SOs? | 65 |
| 3.2 | AQ2: To what extent was the <i>ex ante</i> evaluation carried out following an effective process? | 67 |
| 3.2.1 | What was the process followed in conducting the <i>ex ante</i> evaluation? | 68 |
| 3.2.2 | How did the <i>ex ante</i> evaluator interact with the MA? | 70 |
| 3.2.3 | How were key stakeholders involved in the process of the <i>ex ante</i> evaluation? | 71 |
| 3.3 | AQ3: To what extent did the lessons learned influence and shape the CSP? | 72 |
| 3.3.1 | To what extent did the <i>ex ante</i> evaluation have a positive and constructive role in identifying contradictions, deficiencies, gaps, missing obligations, etc.? | 73 |
| 3.3.2 | To what extent were the conclusions and recommendations provided in the <i>ex ante</i> evaluation considered in the finalisation of the CSPs? | 76 |
| 3.4 | AQ4: What good (<i>ex ante</i>) evaluation practices can be identified across Member States? | 78 |
| 3.4.1 | Good Practices in performing <i>ex ante</i> evaluations | 79 |
| 3.4.2 | Good practices identified in terms of the evaluation process | 80 |



| | |
|---|------------|
| 4. Conclusions and recommendations | 81 |
| 4.1 Conclusion of the synthesis assessment, including contribution of the CSPs to the CAP objectives | 81 |
| 4.1.1 Assessment of the context and needs | 81 |
| 4.1.2 Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) and consistency of the allocated resources as well as the suitability of the selected targets and milestones. | 82 |
| 4.1.3 Assessment of the expected outputs, results and impacts of programmes/plans | 83 |
| 4.1.4 Assessment of the measures planned to reduce administrative burden | 83 |
| 4.1.5 Assessment of horizontal themes | 83 |
| 4.2 Conclusion of the appraisal and limitations | 84 |
| 4.2.1 Completeness, comprehensiveness and coherence of <i>ex ante</i> evaluation reports | 84 |
| 4.2.2 The process followed to conduct the <i>ex ante</i> evaluations | 84 |
| 4.2.3 To what extent were conclusions taken into account in the CSPs | 85 |
| 4.3 Recommendations | 85 |
| 4.3.1 Recommendations addressed to <i>ex ante</i> evaluators and MAs | 85 |
| 4.3.2 Recommendations addressed to the European Commission | 86 |
| 5. Annexes | 87 |
| 5.1 Annex 1 – Publication dates of the <i>ex ante</i> evaluation and SEA reports | 87 |
| 5.2 Annex 2 – Analytical framework and outcomes of data collection mapped and structured | 88 |
| 5.2.1 SQ1: To what extent are the context and SWOT analysis based on recent evidence, and does it take into account experiences gained from implementing the CAP in previous programmes? | 88 |
| 5.2.2 SQ2: To what extent are the needs well defined, prioritised and based on evidence from the context and SWOT analysis? | 90 |
| 5.2.3 SQ3: To what extent is the use of financial instruments financed by the EAFRD justified? | 92 |
| 5.2.4 SQ4: To what extent do the designed interventions respond to the identified national and regional needs? | 93 |
| 5.2.5 SQ5: To what extent are the CSP interventions, their eligibility conditions, definition and conditionality requirements consistent with each other and work in synergy to achieve the objectives coherently? | 94 |
| 5.2.6 SQ6: To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs? | 95 |
| 5.2.7 SQ7: To what extent are the CSPs coherent with other policies, including but not limited to EU, national and regional policies? | 96 |
| 5.2.8 SQ8: To what extent will the expected outputs contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD? | 98 |
| 5.2.9 SQ9: To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries? | 100 |
| 5.2.10 SQ10: To what extent do the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy? | 101 |
| 5.2.11 SQ11: To what extent do the CSPs' environmental and climate architecture contribute to achieving environmental and climate ambition? | 103 |
| 5.3 Annex 3 – Example of screening tool for SQ1 | 105 |
| 5.3.1 SQ1: To what extent is the context and SWOT analysis based on recent evidence, and does it take into account experiences gained from implementing the CAP in previous programmes? | 105 |
| 5.4 Annex 4 – Analytical framework of the appraisal | 108 |
| 5.4.1 Analytical framework for AQ1 | 108 |
| 5.4.2 Analytical framework for AQ2 | 109 |
| 5.4.3 Analytical framework for AQ3 | 110 |
| 5.4.4 Analytical framework for AQ4 | 111 |



| | |
|---|------------|
| 5.5 Annex 5 – Main conclusions from the focus group with the evaluators of the <i>ex ante</i> evaluations of CAP post 2020 | 112 |
| 5.5.1 AQ1: To what extent are the <i>ex ante</i> evaluation reports complete, comprehensive and coherent? | 112 |
| 5.5.2 AQ2: To what extent was the <i>ex ante</i> evaluation conducted following an effective process? | 113 |
| 5.5.3 AQ3: To what extent have lessons learned from carrying out the <i>ex ante</i> evaluation and conclusions and recommendations from the <i>ex ante</i> report influenced the CSP? | 113 |
| 5.5.4 AQ4: What good practices from the <i>ex ante</i> evaluation reports can be identified across Member States? | 113 |
| 5.6 Annex 6 – Targeted survey with the MAs | 114 |
| 5.6.1 Identification | 114 |
| 5.6.2 <i>Ex ante</i> evaluation process | 115 |
| 5.6.3 Contribution of the <i>ex ante</i> evaluation process to the design of the CSPs | 124 |



Figures

| | |
|---|----|
| Figure 1. Time of the main milestones in CSP design | 3 |
| Figure 2. Overall methodological approach for the synthesis | 4 |
| Figure 3. Indicators derived from Annex I of the CSP | 6 |
| Figure 4. Induced changes based on recommendations on the SWOT and needs assessment | 26 |
| Figure 5. Recommendations on SWOT and needs assessment by types of objectives | 27 |
| Figure 6. Induced changes based on recommendations on financial instruments | 29 |
| Figure 7. Financial instruments recommendations by types of objectives | 30 |
| Figure 8. Induced changes based on recommendations on the intervention logic | 34 |
| Figure 9. Intervention logic recommendations by types of objectives | 35 |
| Figure 10. Induced changes of recommendations on the allocation of budgetary resources | 37 |
| Figure 11. Allocation of budgetary resources recommendations by types of objectives | 38 |
| Figure 12. Induced changes of recommendations on external and internal coherence | 40 |
| Figure 13. External and internal coherence recommendations by types of objectives | 41 |
| Figure 14. Induced changes of recommendations on output and results targets and milestones | 44 |
| Figure 15. Output and results targets recommendations by types of objectives | 44 |
| Figure 16. Induced changes of recommendations on the administrative burden | 47 |
| Figure 17. Administrative burden recommendations by types of objectives | 47 |
| Figure 18. Induced changes of recommendations made from the SEA | 53 |
| Figure 19. Structure used by the <i>ex ante</i> evaluation reports | 56 |
| Figure 20. Addressing requirements not linked to Article 139 of Regulation (EU) 2021/2115, by evaluation theme | 63 |
| Figure 21. Availability of information for specific requirements | 65 |
| Figure 22. Availability of information regarding contributions of the CSP to the Green Deal objectives and to achieving higher environmental and climate ambition | 67 |
| Figure 23. The difference in days between the <i>ex ante</i> report and approval of the CSP | 69 |
| Figure 24. Number of revisions to <i>ex ante</i> evaluation reports | 70 |
| Figure 25. MA interaction with evaluators | 70 |
| Figure 26. Interaction with evaluators across different sections of the <i>ex ante</i> | 71 |
| Figure 27. Involvement of stakeholders | 72 |
| Figure 28. MA survey responses on the extent to which recommendations from the <i>ex ante</i> were useful for the design of the CSP | 73 |
| Figure 29. Recommendations categorised by sections of the <i>ex ante</i> /SEA | 74 |
| Figure 30. The elements from the <i>ex ante</i> evaluation or the SEA helped the most to improve the CSPs | 75 |
| Figure 31. Recommendations by type of objective | 76 |
| Figure 32. Addressing recommendations by type of objectives | 77 |

Maps

| | |
|--|----|
| Map 1. To what extent do the <i>ex ante</i> evaluation reports conclude that the context and SWOT analyses are based on recent evidence and take into account experiences gained from implementing the CAP in previous programmes? | 21 |
| Map 2. To what extent do the <i>ex ante</i> evaluation reports conclude that the needs are well defined, prioritised and based on evidence from the context and SWOT analysis? | 24 |
| Map 3. To what extent do the <i>ex ante</i> evaluation reports conclude that the use of financial instruments financed by EAFRD is justified? | 28 |
| Map 4. To what extent do the <i>ex ante</i> evaluation reports conclude that the designed interventions respond to the identified national and regional needs? | 31 |



| | |
|--|----|
| Map 5. To what extent do the <i>ex ante</i> evaluation reports conclude that the CSP interventions, their eligibility conditions, definition and conditionality requirements are consistent and work in synergy to achieve the objectives coherently? | 33 |
| Map 6. To what extent do the <i>ex ante</i> evaluation reports conclude that the allocated budgetary resources are consistent with the CSPs' SOs and GCOs? | 36 |
| Map 7. To what extent do the <i>ex ante</i> evaluation reports conclude that the CSPs are coherent with other policies, including but not limited to EU policies, national and regional policies? | 39 |
| Map 8. To what extent do the <i>ex ante</i> evaluation reports conclude that the expected outputs will contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD? | 42 |
| Map 9. To what extent do the <i>ex ante</i> evaluation reports conclude that the CSP has foreseen measures to reduce the administrative burden on farmers and other beneficiaries? | 45 |
| Map 10. To what extent do the <i>ex ante</i> evaluation reports conclude that the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy? | 48 |
| Map 11. To what extent do the <i>ex ante</i> evaluation reports conclude that the CSPs' environmental and climate architecture contributes to achieving environmental and climate ambition? | 51 |
| Map 12. The extent to which <i>ex ante</i> evaluations fulfil JC for requirements of Article 139 (a) relating to the context and SWOT analysis (SQ1) | 58 |
| Map 13. The extent to which <i>ex ante</i> evaluations fulfil JC for requirements of Article 139 (a) relating to the needs assessment (SQ2) | 58 |
| Map 14. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (a) relating to designed interventions (SQ4) | 58 |
| Map 15. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (g) relating to the use of financial instruments (SQ3) | 58 |
| Map 16. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (b) relating to the CSP interventions (SQ5) | 59 |
| Map 17. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (b) relating to CSP coherence (SQ7) | 59 |
| Map 18. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (c) concerning the allocated budgetary resources (SQ6) | 60 |
| Map 19. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (d) and (e) with regards to expected outputs and realistic quantified targets and milestones (SQ8) | 61 |
| Map 20. The extent to which <i>ex ante</i> evaluations fulfil the JC for requirements of Article 139 (f) concerning measures for reducing administrative burden (SQ9) | 62 |

Tables

| | |
|---|----|
| Table 1. Complementarities between the study evaluation themes, the SQs and the requirements of the CSPs Regulation | 4 |
| Table 2. Matrix of indicators built on Annex I recommendations | 11 |
| Table 3. Number of recommendations and their impacts on the CSPs' drafting | 12 |
| Table 4. General questions on the <i>ex ante</i> evaluation reports | 13 |
| Table 5. Steps to check the completeness of the sources and ensuring quality control of the responses provided by the GEs | 14 |
| Table 6. Process for evaluating validity of input and checking quality of responses | 14 |
| Table 7. Participating Member States per focus group | 18 |
| Table 8. Description of good practices by category in performing <i>ex ante</i> evaluations | 79 |
| Table 9. Good practices identified by category in terms of the evaluation process | 80 |



List of acronyms

| | |
|--------------|--|
| AECM | Agri-Environment Climate Measure |
| AKIS | Agricultural Knowledge and Information System |
| AMS | Area Monitoring System |
| ANCs | Areas facing natural or specific constraints |
| AQ | Appraisal Question |
| Sub-AQs | Sub-Appraisal Questions |
| CAP | Common Agricultural Policy |
| CCO | Cross-Cutting Objective |
| CMEF | Common monitoring and evaluation framework |
| CSPs | CAP Strategic Plans |
| EEA | European Environment Agency |
| EAFRD | European Agricultural Fund for Rural Development |
| EAGF | European Agricultural Guarantee Fund |
| EH | European Evaluation Helpdesk for the CAP |
| EIP | European Innovation Partnership |
| ESI | Emergency Support Instrument |
| EU | European Union |
| FADN | Farm Accountancy Data Network |
| GAEC | Good Agricultural and Environmental Condition |
| GEs | Geographical Experts |
| GHG | Greenhouse Gas |
| GO | General Objective |
| IACS | Integrated Administration and Control System |
| IT | Information Technology |
| JC | Judgement Criteria |
| JRC | Joint Research Centre |
| LEADER | Liaison Entre Actions de Développement de l'Économie Rurale (Links between activities for the development of rural economy) |
| LPIS | Land Parcel Identification System |
| LR | Legal Requirement |
| LULUCF | Land Use, Land-Use Change and Forestry |
| MA | Managing Authority |
| NAP | National Adaptation Plan |
| NECP | National Energy and Climate Plan |
| PMEF | Performance Monitoring and Evaluation Framework |
| RDPs | Rural Development Programmes |
| SEA | Strategic Environmental Assessment |
| SFC platform | System for Fund Management in the European Union |
| SMR | Statutory Management Requirement |
| SO | Specific Objective |
| SP | Strategic Plan |
| Sub-SQs | Sub-Synthesis Questions |
| SQs | Synthesis Questions |
| SWOT | Strengths, Weaknesses, Opportunities and Threats |
| ToC | Theory of Change |
| UAA | Utilised Agricultural Area |



European Union (EU) [Country codes](#) sorted by official protocol order.

| | | | | | | | |
|----------|------|---------|------|-------------|------|----------|------|
| Belgium | (BE) | Greece | (EL) | Lithuania | (LT) | Portugal | (PT) |
| Bulgaria | (BG) | Spain | (ES) | Luxembourg | (LU) | Romania | (RO) |
| Czechia | (CZ) | France | (FR) | Hungary | (HU) | Slovenia | (SI) |
| Denmark | (DK) | Croatia | (HR) | Malta | (MT) | Slovakia | (SK) |
| Germany | (DE) | Italy | (IT) | Netherlands | (NL) | Finland | (FI) |
| Estonia | (EE) | Cyprus | (CY) | Austria | (AT) | Sweden | (SE) |
| Ireland | (IE) | Latvia | (LV) | Poland | (PL) | | |

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Representatives from the Managing Authorities have participated to a survey and *ex ante* evaluators to two focus groups in April 2023.



Executive summary

Introduction

The Common Agricultural Policy (CAP) for the 2023-2027 programming period introduced a significant change of governance with the introduction of the CAP Strategic Plans (CSPs), supporting a shift from a compliance-oriented approach to a more performance-based approach. As part of the performance framework, Article 139 of the Regulation (EU) No 2021/2115 (CAP Strategic Plan regulation) now requires Member States to carry out an *ex ante* evaluation of their CSPs. The purpose of the *ex ante* evaluations is to improve the quality of the design of the CSP and to establish the starting point of the evaluation during the 2023-2027 implementation period.

Compared to previous programming periods, the scope of the *ex ante* evaluation for the 2023-2027 programming period has significantly expanded. Indeed, until now, the *ex ante* evaluation covered interventions financed under the European Agricultural Fund for Rural Development (EAFRD). However, it now encompasses all interventions financed by both the European Agricultural Guarantee Fund (EAGF) and EAFRD. As defined by Article 107, each CSP must include an annex (Annex I) on the *ex ante* evaluation and the Strategic Environmental Assessment (SEA) referred to in Directive 2001/42/EC. This annex should comprise of: (i) a summary of the main results of the *ex ante* evaluation and the SEA, hereby referred to as 'Recommendations'; (ii) an explanation of how these recommendations have been addressed or a justification for disregarding them, referred to as 'Information'; and (iii) a link to the complete *ex ante* evaluation report and SEA report (Article 115).

This study provides a synthesis as well as an appraisal of the quality of the *ex ante* evaluation reports of the 28 CSPs, identifying good practices and potential areas for improvement. It was carried out between December 2022 and June 2023 by the European Evaluation Helpdesk for the CAP (EH).

Methodology

For the synthesis of the *ex ante* evaluation reports, seven evaluation themes and eleven Synthesis Questions (SQs) were used. For the appraisal of the quality of the *ex ante* evaluation reports, four main topics were covered: (i) the completeness, comprehensiveness and coherence of the evaluation reports; (ii) the process followed in conducting the evaluation; (iii) the extent to which conclusions and recommendations have been taken into account in the CSPs; and (iv) the identification of good practices and areas for improvement. Two analytical frameworks, defining judgement and appraisal criteria have been used to summarise information from three main sources, using the submitted versions on the System for Fund Management in the European Union (SFC platform): (i) the *ex ante* evaluation reports; (ii) Annex I to the CSPs on the *ex ante* evaluation, including a summary of the main results of the *ex ante* evaluation; and (iii) the SEA referred to in Directive 2001/42/EC. Three tools were used to extract and collect information: (i) a screening tool used by Geographical Experts (GEs); (ii) two focus groups with evaluators; and (iii) a targeted survey with the Managing Authorities (MAs). The study 'Mapping and analysis of the implementation of the CAP' was used as an additional data source to contextualise the findings and address potential data gaps.

Synthesis of the *ex ante* evaluations

The context and Strengths, Weaknesses, Opportunities and Threats (SWOT) analyses were essential tools in the conception of the CSPs. The importance attached by all Member States to the context and SWOT analyses is underlined by the effort made to collect and assimilate detailed data, information and studies. The vast majority of CSPs presented a comprehensive and coherent dataset, utilising the extensive amount of collected data, information and analysis. Any existing data gaps in the CSPs were acknowledged by the national MA and filled-in whenever possible. While evaluators acknowledged that conducting the context and SWOT analyses for each CAP Specific (SO) proved beneficial, some evaluators highlighted the importance of ensuring that the analysis provides a comprehensive and narrative-driven understanding of the economic, social and environmental aspects alongside the presentation of the data. Additionally, they highlighted that efforts should be made to avoid a siloed approach that focuses on SOs in isolation but instead promote an integrated perspective throughout the CSP.

The needs assessment and prioritisation process builds upon the successful context and SWOT analyses. With the support of the *ex ante* evaluations, all the CSPs established a list of needs based on the context and SWOT analyses, demonstrating a logical input-output relationship and maintaining a consistent approach. Some CSPs had needs that were partially or entirely disconnected from the context and SWOT analyses. Nevertheless, these instances were addressed and revised based on the recommendations provided in the *ex ante* evaluation reports. The most common issue identified was a lack of clarity in the formulation of needs. All CSPs presented a needs prioritisation for each SO. The *ex ante* evaluations confirmed that needs prioritisation in the CSPs followed well-described methodologies with clear criteria and classification processes. The prioritisation methodologies allowed the CSPs to produce tailor-made rankings, which in many cases took into account national and regional specificities and stakeholder and society's opinions. One difficulty encountered was that relevant data was not always readily accessible or of sufficient quality, requiring further processing and analysis. Finally, according to the *ex ante* evaluations, the needs assessment did not sufficiently address gender-specific issues and needs in relation to a fairer distribution of direct payments.

The *ex ante* evaluations played a crucial role in ensuring the relevance of the CSPs. Overall, the evaluators found that the interventions addressed the national, regional and local needs identified for each SO, indicating good alignment between the proposed interventions and the identified needs. The evaluators recommended the inclusion of more precise intervention logics, accompanied by detailed eligibility conditions. This would enhance the clarity and transparency of the interventions. They also emphasised the importance of justifying any regional disparities in the offerings of interventions and providing a clear rationale for any differences. Additionally, incorporating lessons learned from past programming periods was highlighted as a valuable step in enhancing the effectiveness of the CSPs.

The review of the *ex ante* evaluations indicated at least a fair degree of internal coherence of the CSPs. In some cases, evaluators noted partial coherence and inconsistency in interventions, particularly when the CSPs were not yet fully developed. To address these concerns, recommendations were provided to address internal and



regional needs more effectively and to specify the interactions between interventions, eligibility criteria and conditionalities. Regarding the consistency of interventions' eligibility conditions with Good Agricultural and Environmental Condition (GAEC) standards and definitions, most evaluators found that they were consistent to a fair degree, ensuring the achievement of objectives. However, some cases of internal inconsistencies were identified, and concerns were raised about the interaction between GAEC standards and other environment and climate interventions. Lessons learned from past programming periods were considered, although some CSPs lacked clear references or sufficient information in this regard.

Regarding external coherence, evaluators' reports indicated that there are varying levels of coherence between the CSPs and other relevant policies. While most Member States demonstrated some level of coherence between their CSPs and relevant European Union (EU), national and regional policies, there were inconsistencies in terms of detail and justification. Some CSPs showed a lack of coherence with the EU Green Deal, while others exhibited varying degrees of alignment. The evaluators identified potential trade-offs, overlaps and funding gaps between the CSPs and other policies. It is crucial to establish transparent and explicit connections to ensure coherence. In addition, references to previous experiences and lessons learned are absent from the majority of CSPs, which highlights the importance of incorporating these aspects to strengthen external coherence.

The allocated budgetary resources for most CSPs were confirmed by evaluators to be justified by the needs assessment and aligned with the specific and Cross-Cutting Objectives (CCOs) of the CSPs. A large majority of *ex ante* evaluations confirmed that the allocation of budgetary resources to most interventions was at least fairly justified by the assessment of needs and that the assigned unit costs to most interventions were at least fairly consistent with the targets set in the CSP. However, only eight evaluators confirmed that the proposed transfers of allocated budgetary resources or the absence of it between direct payments, sectoral types of interventions and rural development interventions were sufficiently justified.

A large majority of *ex ante* evaluations confirmed that the target values for result indicators in the CSPs were reasonably traceable and justified in terms of inputs, outputs and their values. The evaluations found that the methodological basis for calculating the target values was provided or referenced, and the quantified outcome cited. Target values were generally considered realistic, appropriate, justified and comprehensive, taking into account the financial planning of the CSPs. These values were determined based on identified needs and the planned intervention budgets. Furthermore, the *ex ante* evaluation reports documented that many CSPs considered several factors before setting up target values. Factors that were taken into account included absorption capacity, beneficiary experience, target-setting procedures, implementation capabilities, environmental and climate considerations, design of related interventions, specific information on natural resources and availability of reliable data sources, particularly at regional or local levels. However, less than half of the evaluation reports confirmed that the annual milestones were at least fairly suitable for each relevant result indicator.

The *ex ante* evaluations reported that the design of policies and interventions supported simplification, although further improvements were necessary. Efforts were also made by the CSPs to reduce administrative burdens through the implementation of digital application systems. However, it is crucial to ensure that these systems are user-friendly and accessible to all beneficiaries. Some Member States allowed digital amendments without penalties, demonstrating

a commitment to simplification. Simplification measures were observed in the Integrated Administration and Control System (IACS) application and control procedures, including the use of remote sensing and Area Monitoring System (AMS) technologies. In non-IACS procedures, simplified cost options and technologies, such as geotagged media, will be utilised. However, concerns were raised regarding the extent of simplification achieved, as certain details regarding implementation were yet to be defined.

The *ex ante* evaluations, in most cases, did not comprehensively consider the Green Deal targets in their assessments. However, all CSPs provided explanations on how they intended to achieve relevant national targets, where these existed. According to the evaluators, the CSPs predominantly focused on addressing environmental dimensions, such as excess nutrients and fertiliser use, pesticide use, organic farming and high-diversity landscape features. There was relatively less attention given to antimicrobial resistance, and the rollout of fast broadband internet was hardly considered. To address the Green Deal targets, the CSPs frequently employed a combination of conditionality, eco-schemes and investments interventions. However, the evaluators identified certain limitations concerning the potential effectiveness of interventions and farmers' voluntary participation. For example, concerns were raised about low unit amounts, which could impact the attractiveness of certain interventions and their ability to achieve environmental outcomes.

The *ex ante* and SEA reports demonstrated that CSPs expressed a higher environmental ambition compared to the previous period through a range of actions and commitments aimed at addressing environmental challenges more effectively and efficiently. The CSPs' environmental ambitions are reflected in their investments in sustainable technologies, innovation, environmental infrastructure, and green solutions. They demonstrated higher environmental ambition by implementing or reinforcing interventions that promote new or revised sustainable practices to ensure environmental protection and emissions mitigation. The main recommendations pointed to considering environmental aspects in eligibility conditions for interventions not addressing environmental objectives. However, *ex ante* evaluators raised concerns regarding the guidelines and methodology used to substantiate a credible claim of a 'higher' environmental and climate contribution.

Appraisal of the *ex ante* evaluations

Overall, the *ex ante* evaluation reports demonstrate a high degree of clarity and focus, although certain issues were identified, such as scattered information, missing sections, and lack of consistency in a few reports. While most reports went beyond the Legal Requirements (LRs) by considering external shifts and trends in the agricultural sector, assessing the potential impact of the CSPs remained challenging. Some reports lacked specificity in addressing specific requirements, such as agricultural income issues and national/regional specificities. When evaluating contributions to SOs, only a small number of reports included a dedicated section on the CSPs' contribution, while others were unclear or lacking information. Nevertheless, many reports provided insights into unit amounts per intervention, external factors influencing the objectives, and potential contributions to Green Deal objectives and environmental/climate ambition.

One major limitation of the *ex ante* evaluation exercise was that the assessments were performed on an early draft of the CSPs. Indeed, for 18 CSPs, the final *ex ante* evaluation reports were submitted to the MA 200 days before the approval of the CSP. Therefore, these



ex ante evaluation reports did not reflect the final approved version of the CSP and any potential changes or gaps filled after the submission of the *ex ante* report.

In general, the *ex ante* evaluation process was implemented in a similar manner across Member States and conducted in parallel with the development of the CSPs. A multi-phase approach was followed, although the structure and depth of analysis varied. The evaluations were carried out by independent experts (external evaluators) based on the sections of the CSPs provided by the MA responsible for drafting the CSP. Each *ex ante* evaluation provided an independent view of the CSP's preparation. The complete *ex ante* evaluation report was submitted by the independent evaluator to the MA. However, the extent to which *ex ante* evaluation findings reflected the approved CSP depends on the feedback process put in place by the MA.

In total, 1 868 recommendations were submitted by *ex ante* evaluators to MAs. The majority of recommendations were related to the intervention logic (22%), followed closely by SEA-specific recommendations (21%). Recommendations linked to the SWOT analysis and needs assessment accounted for 18% of the total. Conversely, the fewest recommendations were made for budgetary resource allocation (2%), administrative burden reduction measures (2%), and financial instruments (1%). Approximately 42% of the recommendations led to updates in the CSPs, while for 36% of the recommendations, no changes were made to the CSPs, although information was provided. For the remaining recommendations (22%), it is unclear whether the justification presented in the Annex resulted in updates to the CSPs.

Overall, the recommendations made a positive impact on the design of the CSPs. The highest number of recommendations (28%) were related to the environmental objectives, although they resulted in the fewest changes to the CSP. On the other hand, recommendations concerning multiple objectives accounted for 18% of the total, and most of these recommendations were incorporated, leading to updates in the CSP. Similarly, recommendations related to societal objectives (16%) and economic objectives (15%) also led to changes in the CSP. Recommendations emphasising the need for improved data utilisation, strengthened synergies between interventions, addressing gaps between needs and interventions, and enhancing the links between interventions and indicators contributed to an overall improvement in the quality of the CSPs.

The appraisal of the *ex ante* evaluation reports highlighted several weaknesses and potential areas for improvement. Evaluators rarely provided comments on potential impact and the conclusions regarding impact often lacked evidence. To assess potential impacts, evaluators suggested the use of quantitative analysis and Theory of Change (ToC) methodologies. However, concerns were raised about the availability of required data for such assessments and the lack of connections with impact indicators. The evaluation of the unit amount per intervention received less attention in many *ex ante* reports. Lessons learned gained from the preceding programming period were presented to support specific decisions, though lacking a clear explanation of how these experiences had been factored into the decision-making process. Only a limited number of *ex ante* reports identified specific risks or factors that could affect the achievement of targets and SOs. The extent of well-defined causal links between needs, interventions and result indicators varied and was often dependent on the amount of information provided to evaluators.

Recommendations

Based on the analysis, the following recommendations aim to enhance the effectiveness and comprehensiveness of the *ex ante*

evaluation process and support the successful design and implementation of the CSPs.

Recommendations addressed to *ex ante* evaluators and MAs

- 1. Promoting early evaluation:** the introduction of new interventions, such as eco-schemes, emphasises the need to implement the evaluation early in the process. Carrying out evaluations at an early stage would strengthen the robustness of *ex ante* evaluations in the next programming period.
- 2. Evaluate the final approved CSP:** around two-thirds of *ex ante* evaluations were based on early draft CSPs. The EH recommend revising the final *ex ante* evaluation report in light of the approved CSP and in its entirety. This, in turn, will allow the *ex ante* evaluation process to fulfil two objectives: to improve the quality of the design of the CSP and also to establish a clear starting point of the evaluation process for the programming period.
- 3. Leverage lessons learned from past programming periods:** while lessons learned were mentioned in the *ex ante* reports, their significance lies in how they contribute to the design of CSPs, including intervention uptake, necessary improvements and efficient implementation.
- 4. Enable effective feedback mechanisms:** thorough monitoring is essential to track changes made to draft CSPs and the uptake of *ex ante* evaluation recommendations. Evaluators should prioritise their recommendations and MAs should establish strong feedback mechanisms.
- 5. Targeted strategic stakeholder engagement:** stakeholder involvement should be used strategically to ensure meaningful engagement and prevent stakeholder fatigue. A targeted consultative process should effectively capture diverse perspectives and expertise during the *ex ante* evaluation process.
- 6. Promote the use of visual tools:** visual tools have proven very helpful throughout the *ex ante* evaluations, improving the communication of findings and recommendations. Further guidance on the use of visual aids would be beneficial.

Recommendation addressed to the EC

- 1. Broaden the *ex ante* evaluation scope:** most *ex ante* evaluations focused on requirements outlined in Article 139 but overlooked other legal obligations, such as the assessment of needs in relation to a fairer distribution and more effective and efficient targeting of direct payments. To address this, the EH recommends expanding the scope of *ex ante* evaluations to comprehensively assess all elements of the regulation.
- 2. Foster structural coherence and synergies by standardising the reporting structure:** conducting the SWOT analysis and needs assessment by strategic objective improved the comprehensiveness of the analysis, but hindered a holistic view. To overcome this, the EH recommends establishing a standardised structure for *ex ante* evaluation reports to facilitate the evaluation of CSPs' contributions to EU ambitions which could include an assessment across all SOs to provide a comprehensive overview.
- 3. Establish better links with impact indicators:** the current intervention strategies lack established links with impact indicators. To allow an *ex ante* impact assessment, impact indicators could be included in the intervention logic of each SO. Additionally, a budget breakdown per SO would facilitate assessing the contribution of CSPs and enable better comparison between programming periods.



Introduction

The study 'Synthesis of *ex ante* evaluations of CAP post-2020' was conducted by the European Evaluation Helpdesk (EH) for the CAP between December 2022 and June 2023. The objective of this study was to provide a synthesis and analysis of the *ex ante* evaluations carried out and submitted by the MAs regarding their CSPs. The study provided a synthesis report and an assessment of the overall quality of the *ex ante* evaluation reports, identifying good practices and potential areas for improvement.

The content of this report is organised as follows:

- The first section introduces the new Performance Monitoring and Evaluation Framework (PMEF) of the CAP 2023-2027, and the purpose and significance of these *ex ante* evaluations in the context of the new PMEF. It also describes the different processes undertaken by Member States in conducting the *ex ante* evaluations.
- The second section outlines the methodological approaches followed by the EH for synthesising and analysing the *ex ante* evaluation reports and activities undertaken to support this exercise.
- The third section presents the findings of the synthesis exercise for each of the eleven SQs. It examines the outcomes of the *ex ante* evaluations and identifies trends, patterns, and commonalities among Member States.
- The fourth section presents the findings of the appraisal exercise for each of the four Appraisal Questions (AQs).
- The final section concludes the synthesis and the appraisal. It summarises the main insights gained from the *ex ante* evaluations and, where feasible, presents the evaluators' conclusions regarding the overall performance of the CSPs towards the CAP SOs. Finally, it highlights the key recommendations for the *ex ante* evaluations of the CAP 2023-2027 and post 2027.

Performance, Evaluation and Monitoring Framework of the CAP 2023-2027

The CAP for the 2023-2027 programming period introduced a significant change of governance with the introduction of the CAP SPs (CSPs) and a new PMEF supporting a shift from a compliance-oriented approach to a more performance-based approach. In this new model, performance will be measured concerning the nine SOs and the CCO of the CAP, as described below:

- SO1: to ensure a fair income for farmers;
- SO2: to increase competitiveness;
- SO3: to improve the position of farmers in the food chain;
- SO4: climate change action;
- SO5: environmental care;
- SO6: to preserve landscapes and biodiversity;
- SO7: to support generational renewal;
- SO8: vibrant rural areas;
- SO9: to protect food and health quality;
- CCO: fostering knowledge and innovation.

Measurement of performance will be achieved through a set of common indicators (see Annex I, Regulation (EU) 2021/2115¹ (CSP regulation)). The Regulation (EU) 2021/2115 defines 29 impact indicators, 44 result indicators, 37 output indicators and 49 context indicators.

- Impact indicators - serve to assess the overall policy performance multi-annually at the level of the overall objectives (mid-term and *ex post* evaluations). The data needed for the impact indicators will primarily come from established data sources, such as the Farm Accountancy Data Network (FADN), European Environment Agency (EEA) and Eurostat.

- Result indicators - for regular policy performance follow-up, conclude policy efficiency and effectiveness, assess the performance of the CSPs, for target setting in CSPs and to monitor progress towards those targets (Annual Performance Review).
- Output indicators - annual indicators linking the expenditure with the performance of policy implementation, used for annual performance clearance.
- Context indicators - reflect the relevant aspects of the general contextual trends in the economy, environment and society, which are likely to have an influence on performance.

In the 2023-2027 programming period, the *ex ante* evaluation is part of the performance framework and covers the entire CSP of a Member State. Thus, the scope of the *ex ante* undertaken for the 2023-2027 programming period was broadened significantly compared to previous programming periods, when it only encompassed the EAFRD and was a more complex task. In addition, the EAGF represents the larger part of the CAP budget, whereby its inclusion in the *ex ante* broadens the requirements for Member States to undertake robust evaluations.

Furthermore, the CAP has increased its ambition related to environmental and climate aspects. The analysis should therefore make explicit how the CSPs are meant to contribute to the achievement of and to be consistent with the long-term national targets set out in or derived from the legislative acts listed in Annex XIII of Regulation (EU) 2021/2115. Moreover, the analysis should also assess the situation of each Member State in light of its contribution to the Green Deal targets and ambitions: the targets related to the use and risk of pesticides, sales of antimicrobials, nutrient losses (reduction of excessive use of fertilisers), the area under organic farming, high-diversity landscape features on agricultural land and access to fast broadband internet in rural areas. However, it is worth noting that the attainment of the Green Deal targets does not solely depend on the agricultural sector.

1 Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for SPs to be drawn up by Member States under the CSPs and financed by the EAGF and by the EAFRD.



As in the previous programming period, Member States are responsible for carrying on the *ex ante* evaluation of their CSPs, while the Commission should be responsible for the syntheses at EU level of the Member States' *ex ante* evaluations (see Recital 120 of Regulation (EU) 2021/2115).

According to Article 128 of Regulation (EU) 2021/2115, Member States and the Commission should establish a performance framework to allow, among other things, for the *ex ante*, interim and *ex post* evaluations and all other evaluation activities linked to the planned arrangements for the implementation of the CSP. As part of the performance framework, Article 139 of Regulation (EU) 2021/2115 requires Member States to carry out an *ex ante* evaluation of their CSP. This evaluation constitutes the first evaluation activity of the CSP during the implementation period of 2023-2027, having the purpose of improving the quality of its design. It is a key element of the performance framework as it provides the basis for effective monitoring and evaluation during the implementation of the CSP.

As defined by Article 107 of Regulation (EU) 2021/2115, each CSP must include an annex (Annex I) on the *ex ante* evaluation and the SEA referred to in Directive 2001/42/EC of the European Parliament and of the Council. It shall include according to Article 115 of Regulation (EU) 2021/2115:

- › A summary of the main results of the *ex ante* evaluation and the SEA, hereby referred to as 'Recommendations';
- › How these have been addressed or a justification as to why they have not been taken into account, hereby referred to as 'Information'; and
- › A link to the complete *ex ante* evaluation report and SEA report.

The *ex ante* evaluation should provide an independent and informed view of the preparation of CSPs. In this respect, the *ex ante* evaluations shall appraise the following according to Article 139 of Regulation (EU) 2021/2115:

- › The contribution of the CSP to the achievement of the nine SOs, taking into account the national and regional needs and the potential for development as well as the lessons learned from the implementation of the CAP in previous programming periods;
- › The internal coherence of the proposed CSP and its relationship with other relevant instruments;
- › The consistency of the allocation of budgetary resources with the nine SOs that are addressed by the CSP;
- › How the expected outputs will contribute to the results;
- › Whether the quantified target values for results and milestones are appropriate and realistic, taking into account the support envisaged from the EAGF and the EAFRD;
- › The measures envisaged to reduce the administrative burden for farmers and other beneficiaries; and
- › Where relevant, the rationale for the use of financial instruments financed by the EAFRD.

Furthermore, Member States may decide to include in their *ex ante* evaluation the requirements of the SEA taking into account climate change mitigation needs.

Overview of the *ex ante* evaluation process

In general, the process of developing the *ex ante* evaluation reports has been similar between Member States, meaning that it was carried out in parallel with the preparation of the CSPs. The *ex ante* evaluations were carried out by independent experts (external evaluators) together with the national competent authority in charge of drafting the CSP (MA). In each case, the *ex ante* evaluation provided an independent view of the preparation of the CSP.

The completed *ex ante* evaluation report was submitted by the independent evaluator to the MA for feedback. As a follow-up a summary of the main results of the *ex ante* evaluation, together with a link to the completed *ex ante* evaluation and the SEA was submitted by the responsible MA to the Commission together with the entire CSP (i.e. as Annex I of the CSP).

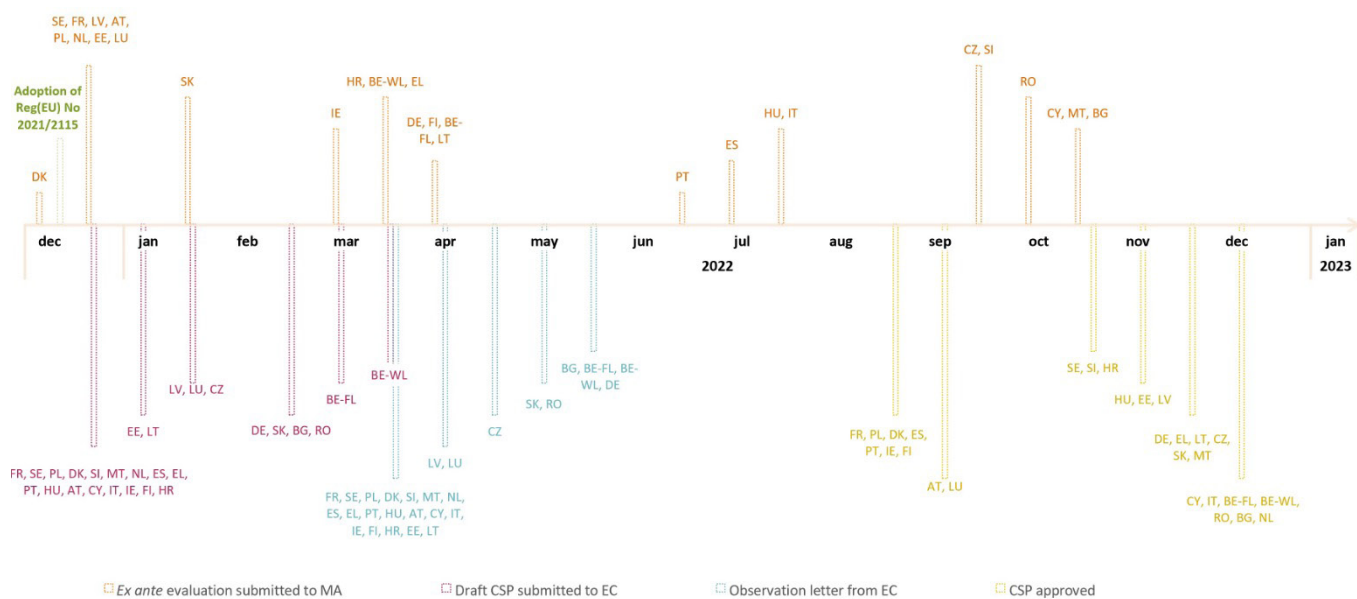
What was the process followed in conducting the *ex ante* evaluation?

The *ex ante* evaluation is strongly linked to timeframe for the adoption of the Regulation (EU) 2021/2115, negotiations and discussions, as well as the drafting of the CSPs as outlined in the toolkit for the *ex ante* evaluation report prepared by the EH *ex ante*.

The MAs have adopted several strategies. As [Figure 1](#) shows, some MAs completed their *ex ante* evaluation prior to the submission of their first draft CSP while others after the approval of their final CSP. In the case where the *ex ante* reports were submitted before the submission of the CSP, it is likely that the *ex ante* evaluation reports did not consider the CSP in its entirety nor was the final version of the CSP considered by the *ex ante*. Consequently, while this report provides a synthesis of the *ex ante* evaluation reports, these reports do not capture the contents of the final submitted versions of the CSPs.



Figure 1. Time of the main milestones in CSP design



Source: European Evaluation Helpdesk for the CAP (2023)

In the survey conducted with MAs², 27 authorities indicated that a multiphase approach was used, with evaluators assessing the individual chapters of the CSP and providing recommendations before moving on to the next chapter of the CSP³. This was also confirmed during the focus group discussions, as explained in [Section 2](#) of the appraisal of the *ex ante* evaluation reports.

The adoption of a multiphase approach was considered practical given the tight timeframe for the adoption of the Regulation, negotiations and discussions, as well as the drafting of the CSPs. However, it also presented challenges. First, the time taken for the adoption of the Regulation and negotiations in effect led to a reduced amount of time available for conducting the evaluation. In the survey conducted with the MAs, 11 authorities only partially agreed that sufficient time was available for each phase.

In general, the evaluators provided feedback at each stage of the

ex ante evaluation, in line with Article 139 (a to g) of Regulation (EU) 2021/2115, i.e.:

- strengths, weaknesses, opportunities and threats (SWOT) analyses and assessment of needs and their prioritisation;
- internal coherence;
- consistency of the allocation of budgetary resources with SOs;
- expected outputs and contribution to results;
- assessment of quantified target values for results and milestones;
- measures planned to reduce the administrative burden; and
- the rationale for the use of financial instruments.

During each phase, the evaluators provided a series of recommendations to the MA, culminating in the submission of a set of recommendations as presented in Annex I of the submitted CSPs.

2 As explained further in this report, 27 MAs provided answers to the survey reflecting 27 CSPs. Only one MA did not participate in the survey.

3 The MA survey provides sufficient representation (English) with only one Member State not participating in the survey.



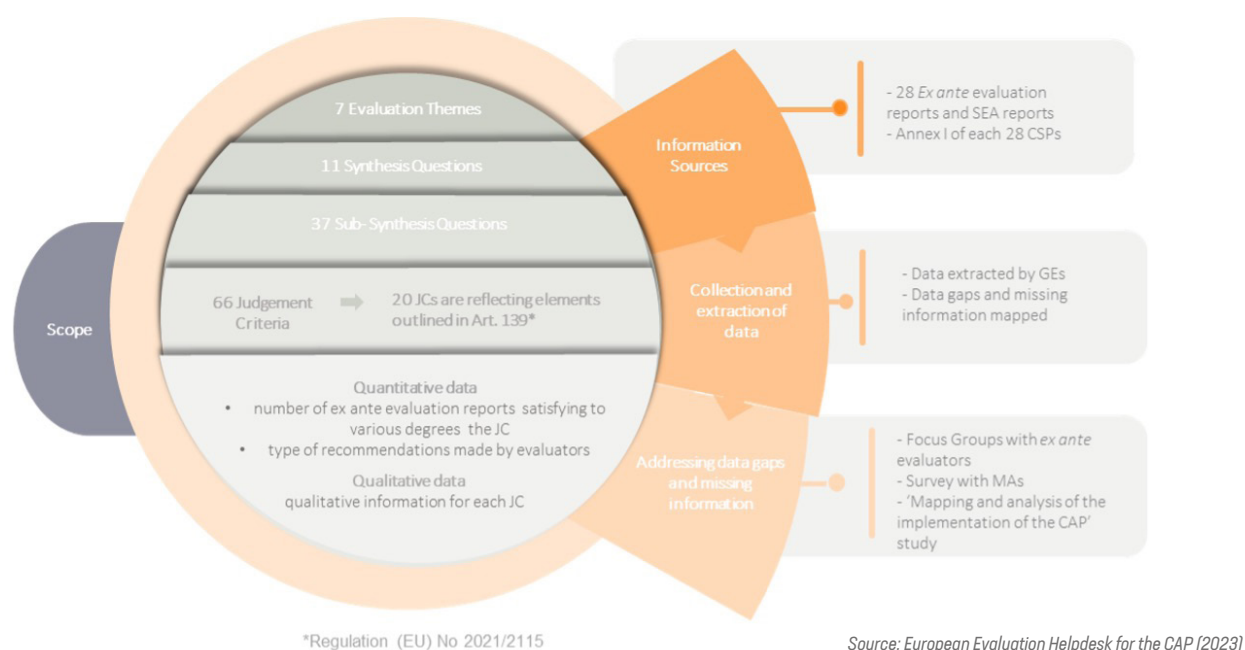
1. Methodological approach

The methodological approach described in this report aims to contribute towards achieving the two main objectives of this study. The first objective was to synthesise and analyse the existing information gathered from these evaluations, while the second was to appraise the *ex ante* evaluation reports to identify good practices and areas for improvement. Both parts of this study were considered as two parallel exercises, with the synthesis process informing the appraisal. To achieve this the EH has proposed two distinct methodological approaches.

1.1 Methodological approach for the synthesis

Figure 2 summarises the overall methodological approach for the synthesis. It is centred around seven evaluation themes, which are then elaborated into 11 SQs, Sub-Synthesis Questions (Sub-SQs), and Judgement Criteria (JCs). The specifics of each step are further discussed in the following sub-sections.

Figure 2. Overall methodological approach for the synthesis



1.1.1 Scope of the synthesis

The scope of the synthesis exercise was to analyse and synthesise the *ex ante* evaluations submitted by Member States for their CSPs for the 2023-27 programming period of the CAP. To accomplish this task the EH formulated 11 SQs related to six out of the seven themes evaluated in the study. These SQs formed the foundation for the analysis and synthesis of the *ex ante* evaluation reports. The interconnections and complementarities between the evaluation themes, SQs and the requirements that are outlined in the CSP Regulation are detailed in Table 1.

Table 1. Complementarities between the study evaluation themes, the SQs and the requirements of the CSPs Regulation

| Evaluation themes | SQs | Regulation (EU) No 2021/2115 |
|--|---|---|
| I. Assessment of the context and needs | SQ1: To what extent are the context and SWOT analysis based on recent evidence, and does it take into account experiences gained from implementing the CAP in previous programmes? | Art. 139(a) The contribution of the CSP to achieving the SOs set out in Article 6(1) and (2), taking into account national and regional needs and potential for development as well as lessons drawn from the implementation of the CAP in previous programming periods. |
| | SQ2: To what extent are the needs well defined, prioritised and based on evidence from the context and SWOT analysis? | |
| | SQ3: To what extent is the use of financial instruments financed by the EAFRD justified? | Art. 139(g) Where relevant, the rationale for the use of financial instruments financed by the EAFRD. |



| Evaluation themes | SQs | Regulation (EU) No 2021/2115 |
|---|--|---|
| Two themes: II. Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) III. The consistency of the allocated resources as well as the suitability of the selected targets and milestones | SQ4: To what extent do the designed interventions respond to the identified national and regional needs? | Art. 139(a) The contribution of the CSP to achieving the SOs set out in Article 6(1) and (2), taking into account national and regional needs and potential for development as well as lessons drawn from the implementation of the CAP in previous programming periods. |
| | SQ5: To what extent are the CSP interventions, their eligibility conditions, definition and conditionality requirements consistent with each other and work in synergy to achieve the objectives coherently? | Art. 139(b) The internal coherence of the proposed CSP and its relationship with other relevant instruments. |
| | SQ6: To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs? | Art. 139(c) The consistency of the allocation of budgetary resources with those SOs set out in Article 6(1) and (2) that are addressed by the CSP. |
| | SQ7: To what extent are the CSPs coherent with other policies, including but not limited to EU policies, national and regional policies? | Art. 139(b) The internal coherence of the proposed CSP and its relationship with other relevant instruments. |
| IV. Assessment of the expected outputs, results and impacts of programmes/plans | SQ8: To what extent will the expected outputs contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD? | Art. 139 (d) How the expected outputs will contribute to results; (e) Whether the quantified target values for results and milestones are appropriate and realistic, having regard to the support envisaged from the EAGF and EAFRD. |
| V. Assessment of the measures planned to reduce the administrative burden | SQ9: To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries? | Art. 139(f) Measures planned to reduce the administrative burden on farmers and other beneficiaries. |
| VI. Assessment of horizontal themes (such as contribution to Green Deal and Farm to Fork objectives) | SQ10: To what extent do the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy? | N/A |
| | SQ11: To what extent does the CSPs' environmental and climate architecture contribute to achieving environmental and climate ambition? | Art. 105 |

The seventh evaluation theme, which focuses on the 'Identification of common trends at the European level', was examined across all SQs and assessment themes. The findings in this area served as a foundation for the 'Conclusion of the synthesis and limitations' along with the subsequent recommendations. Furthermore, the work on the study entitled 'Mapping and analysis of the implementation of the CAP' enriched the analysis of this particular evaluation theme. This additional study provided useful information on the final decisions made by Member States that were not necessarily reflected in the *ex ante* evaluation reports, such as identified needs in relation to a fairer distribution and more effective and efficient

targeting of direct payments and in relation to risk management, possible budget transfer between the EAGF and the EAFRD and also valuable insights into the overall environmental and climate ambitions of the CSPs.

Two of the evaluation themes were explored simultaneously due to their close relationship, namely the 'Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set)' and 'The consistency of the allocated resources as well as the suitability of the selected targets and milestones'.



The sixth theme, 'Assessment of horizontal themes (such as contribution to Green Deal and Farm to Fork objectives)', focused on the assessment carried out through the *ex ante* evaluation of the CSPs towards EU targets under the Farm to Fork Strategy and Biodiversity Strategy. The *ex ante* reports, along with the SEA, were expected to assess, based on the situation of each Member State, the potential contribution of each respective national CSP to the achievement of the following EU indicators:

- > reduction of the use and risk of chemical pesticides;
- > reduction of nutrient losses;
- > reduction of fertiliser use (linked to the nutrient loss target, not a separate target);
- > increase of farmland under organic practices;
- > increase of high-diversity landscape features;
- > increase of broadband coverage in rural areas.

Additionally, in a context where the EU has set more ambitious greenhouse gas (GHG) reduction targets for the future and where there is an expectation that the 2023-2027 programming period will contribute to these targets, the *ex ante* evaluation or the SEA may have assessed the potential contribution to the reduction of GHG emissions and the increase of carbon sequestration.

1.1.2 Information sources

The EH used the following data sources to answer the SQs and complete the synthesis:

- > the *ex ante* evaluation reports (submitted on the SFC platform) that detail the methodological approach and data sources;
- > Annex I to the CSPs on the *ex ante* evaluation, including a summary of the main results of the *ex ante* evaluation;
- > the SEA referred to in Directive 2001/42/EC of the European Parliament and of the Council (submitted version on the SFC platform).

The EH developed tools to support the extraction of information from these data sources. These tools include a screening tool for extracting information by GEs, two focus groups (see Methodological approach, [Section 1.2.1](#)) with *ex ante* evaluators and a targeted survey with the MAs (see Methodological approach, [Section 1.2.2](#))

However, in the context of the synthesis exercise, the information collected was also used to:

- > source information which was outside the content of the *ex ante* evaluations and could fill potential data gaps; and
- > capture the engagement process of relevant stakeholders.

The study 'Synthesis of *ex ante* evaluations of CAP post-2020' was implemented in parallel to the study 'Mapping and analysis of the implementation of the CAP'. The results of the latter were used as a data source to contextualise the EH findings and address potential data gaps identified in the *ex ante* synthesis (see Methodological approach, [Section 1.2.3](#))

1.1.3 Type of data: qualitative and quantitative

During the screening exercise, three types of data were collected. The GEs extracted qualitative information on each SQ and Sub-SQs, which was subsequently used by the EH team to assess these questions.

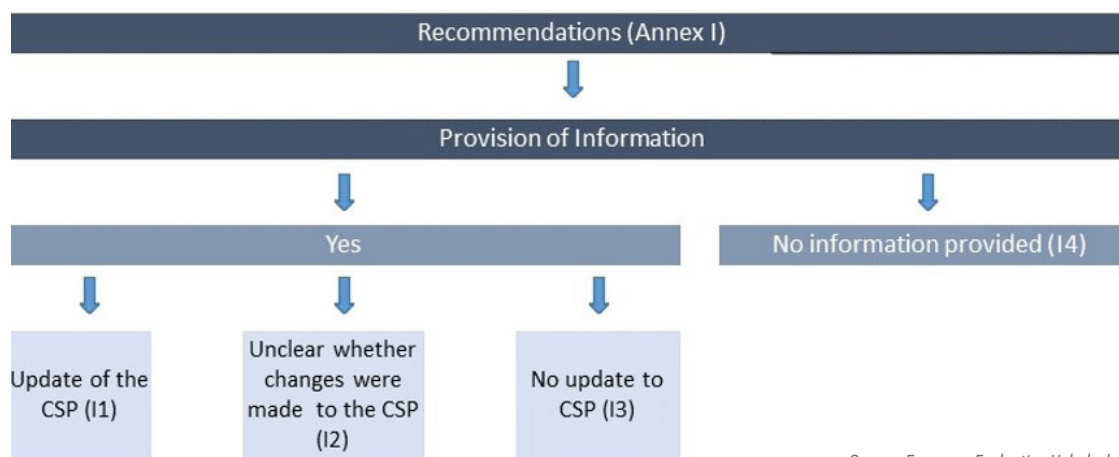
We established JC for each Sub-SQ to facilitate our assessment. These criteria serve as standardised measures against which the quality and sufficiency of the available information can be evaluated. These JCs were developed based on the requirements of Article 139, *ex ante* toolkit and best practices, which are detailed in [Annex 2](#). In addition, two types of quantitative information were generated. First, a systematic extraction of quantitative information took place for each judgment criterion, as shown in [Annex 2](#). This involved determining the number of *ex ante* evaluation reports where sufficient information was available to answer each criterion. The collected indicators are based on the following variables:

- > For each JC, the number of *ex ante* evaluation reports where there is sufficient information to answer the JC.
- > For each JC, the number of *ex ante* evaluation reports where the JC is not satisfied or satisfied to varying degrees.

Second, the EH team compiled a comprehensive set of indicators in accordance with the recommendations outlined in Annex I of the CSP, as outlined in [Figure 3](#).

Further information on the data collected from Annex I is presented in Methodological approach, [Section 1.1.5](#) of this report.

Figure 3. Indicators derived from Annex I of the CSP



Source: European Evaluation Helpdesk for the CAP (2023)



1.1.4 Analytical framework of the synthesis

In this section, the EH discusses briefly the understanding of the SQs. [Annex 2](#) provides a detailed breakdown of the SQs into several Sub-SQs and their accompanying JC that served as guidelines for the GE for extracting information see [Annex 3](#). Furthermore, the JC are classified into two categories:

- › JC that reflect the LRs of Article 139 of Regulation (EU) 2021/2115, set out in the analytical framework tables in [Annex 2](#).
- › JC that reflect *ex ante* evaluation practices not directly linked to Article 139 of Regulation (EU) 2021/2115

It is important to note that this classification is subjective and can be interpreted in more than one way. However, the EH team has strived to reflect the true intention behind Article 139 of Regulation (EU) 2021/2115 in its classification.

1.1.4.1 Analytical framework for SQ1. To what extent are the context and SWOT analysis based on recent evidence, and does it take into account experiences gained from implementing the CAP in previous programmes?

The purpose of this SQ was to determine whether the *ex ante* evaluation confirmed that the context and SWOT analyses used in the design of the CSPs were evidence-based.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- › the SWOT analysis was comprehensive, complete, coherent and specific;
- › the SWOT analysis was based on the most recent, relevant and reliable evidence;
- › the SWOT analysis considered lessons learned from previous experience; and
- › the SWOT analysis identified and attempted to fill data gaps.

1.1.4.2 Analytical framework for SQ2. To what extent are the needs well defined, prioritised and based on evidence from the context and SWOT analysis?

SQ2 examined whether the *ex ante* evaluation reports confirmed that the needs identified were based on the SWOT analysis and were prioritised overall and by SO. It also examined whether, based on the *ex ante* evaluation reports, Member States' need assessments reflected a fairer, more effective, and more efficient targeting of direct payments to comply with the requirements of Article 108(c) of Regulation (EU) 2021/2115.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- › the link between the SWOT and the identification and assessment of needs;
- › the process of prioritising the identified needs;

- › whether the assessment of needs is comprehensive, specific and complete;
- › whether the assessment of needs took account of the lessons learned in past programming periods;
- › whether the assessment of needs examined the need for a fairer, more effective and more efficient targeting of direct payments.

1.1.4.3 Analytical framework for SQ3. To what extent is the use of financial instruments financed by the EAFRD justified?

SQ3 examined whether the *ex ante* evaluation reports confirmed the justification for the use of financial instruments financed by the EAFRD. Based on the *ex ante* evaluation reports, the EH examined whether the justification for the provision of financial instruments was supported by evidence. The evidence should be provided in the SWOT analysis, primarily under SO1, SO2 and SO7, but also in other SOs. For example, the SWOT analysis may identify a market failure situation where farmers are unable to implement grant projects due to lack of own resources, and this fact has been prioritised in the needs assessment. Evidence may also include very high-interest rates charged by commercial banks or market gaps⁴. In addition, based on the *ex ante* evaluation reports, an examination was carried out on whether the planned financial instruments were complete and coherent. Finally, this SQ examined if the Member State intends to use funds from the EAFRD to contribute to other available funds, such as InvestEU.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- › the use of financial instruments is evidence-based;
- › the provided rationale, type and main conditions of the planned financial instruments are complete and coherent;
- › where relevant, the CSPs justify the provision of EAFRD resources to InvestEU.

1.1.4.4 Analytical framework for SQ4. To what extent do the designed interventions respond to the identified national and regional needs?

SQ4 examined the consistency between the proposed intervention strategy, including the interventions, their eligibility conditions, definitions and conditionality, and the identified national and regional needs. In other words, it examined how the CSPs design the interventions to address the identified and prioritised needs and therefore contribute positively to the SOs. The relationship between identified needs and intervention strategies should be evidence-based and take into account the experience of past programming periods.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- › the proposed interventions meet the identified needs and thus contribute to the SO(s);
- › there is the existence of a causal link between the identified needs and the proposed interventions;

4 Much of the evidence identified in the SWOT analysis may have been identified in the Member States' individual reports on the 'Study on financial needs in the agriculture and agri-food sectors in 24 EU Member States', which excludes Malta, Cyprus and Luxembourg.



- there is a sound and well-documented intervention logic for each SO showing how conditionality, the designed interventions and the way they operate in combination addressing the identified needs and thus contributing positively to the SOs;
- lessons learned from past programming periods have been considered when designing interventions.

1.1.4.5 Analytical framework for SQ5. To what extent are the CSP interventions, their eligibility conditions, definition and conditionality, consistent with each other and work in synergy to achieve the objectives coherently?

SQ5 explored the internal coherence of the CSPs, i.e. the extent to which there is consistency between the main building blocks of the CSP architecture, such as interventions, GAEC standards, definitions (as referred to in Article 4 of Regulation (EU) 2021/2115), as well as the characteristics of the interventions, such as beneficiaries and eligibility criteria.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- there is consistency, synergy and balance between interventions in reaching the programme SOs set out in Article 6(1) and the general and CCOs set out in Article 5 (i.e. there are interventions which contribute to several objectives and support each other working in synergy, or there are interventions that compensate or mitigate the negative trade-off between other interventions and avoid incompatibilities in the achievement of objectives);
- there is consistency, synergy and balance between interventions and their eligibility conditions with the GAEC standards and definitions;
- Lessons learned from past implementation periods regarding the internal coherence of Rural Development Programmes (RDPs) and Pillar I interventions have been taken into account when designing the intervention strategy of the CSP.

1.1.4.6 Analytical framework for SQ6. To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs?

SQ6 explored whether there was a clear justification of how the budgetary resources in the CSPs had been allocated to the designed interventions and whether the allocation was consistent with the CSPs' specific and CCOs and the assessment of needs.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- the allocation of budgetary resources for each intervention is consistent with the assessment and prioritisation of needs, and the intervention logic;
- the allocation of budgetary resources and the assigned unit costs to each intervention are consistent with the targets set in the CSP;
- the proposed transfers of allocated budgetary resources between direct payments, sectoral types of interventions and types of interventions for rural development in the CSP are justified;
- the lessons learned in past programming periods have been taken into account when designing the budget of the CSPs.

1.1.4.7 Analytical framework for SQ7. To what extent are the CSPs coherent with other policies, including but not limited to EU policies, and national and regional policies?

SQ7 established whether the CSPs were externally coherent with relevant policy objectives and targets of national, EU and international policies and if lessons learned from past programming periods had been taken into account to achieve complementarity.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- there is consistency and synergy between the CSP and the policies expressed in the legislative acts of Annex XIII of the Regulation;
- there is consistency, synergy and balance between the CSP and other relevant policies; and
- lessons learned regarding external coherence from past implementation periods have been taken into account when designing the intervention strategy of the CSP.

This entails an assessment of the CSPs' external coherence with:

- biodiversity, natural resource management and climate policies explicitly referred to in Annex XIII of Regulation (EU) 2021/2115 and other related policies that can support or constrain the CSPs' SOs;
- other relevant policies or non-Annex XIII policies such as strategic policy objectives, other EU/Emergency Support Instrument (ESI) programmes and national/regional policies.

1.1.4.8 Analytical framework for SQ8. To what extent will the expected outputs contribute to results, expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from EAGF and EAFRD?

SQ8 examined how the expected outputs of the interventions contribute to the result indicators, their targets and the milestones identified in the CSPs. This assessment helped to check whether the target values of the result indicators and the annual milestones have been realistically established and appropriately calculated, based on the amount of allocated inputs, i.e. the foreseen support from EAGF and EAFRD and planned outputs.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- the target values for each result indicator are realistic;
- the suitability of annual milestones for each relevant indicator;
- lessons learned in past programming periods have been taken into account when establishing milestones and targets.

1.1.4.9 Analytical framework for SQ9. To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries?

SQ9 examined the extent to which the CSPs had taken steps to ensure that the administrative burden was reduced, mainly by simplifying policy implementation at the level of the final beneficiary. Administrative burden refers to inefficiencies in time or financial resources at the various stages of policy design and implementation. For SQ9, the reduction of administrative burden depends on how successful the interventions and the processes are in conveying the



essence of the procedures without unnecessary complications and making use of technologies that save time, such as the automatic retrieval of the necessary data from existing sources.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- › simplification in the design of the policy and interventions and throughout the different steps of the policy cycle: from the application process (e.g. best practices of Member States with the use of technologies during the application process) to the control, payment, monitoring and reporting processes;
- › the promotion of simplification and reduction of administrative burden via increased use of digital tools and applications, online or offline, in all stages of the applicant-agency interface, including the information collection, application, audit and control stages;
- › the reduction of transaction costs which may be required by various intervention requirements.

1.1.4.10 Analytical framework for SQ10. To what extent do the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy?

SQ10 aimed to examine the extent to which the CSPs contributed to the Green Deal objectives. More specifically this SQ examined if the CSPs contributed to the following targets set in the Farm to Fork Strategy and Biodiversity Strategy:

- › the reduction in the use and risk of pesticides;
- › the reduction of excess nutrients and the use of nutrients;
- › the increase share of organic agriculture;
- › the reduction in the use of antimicrobials;
- › the restoration of agricultural areas under high-diversity landscape features to provide space for wild animals, plants, pollinators and natural pest regulators;
- › access to fast broadband internet.

In addition, the *ex ante* reports may identify shortcomings e.g. in relation to the Green Deal targets, which are not addressed in the CSPs or which receive very little attention in qualitative or quantitative terms.

Finally, several Member States may have included indicative national targets at the impact level for pesticides, nutrient losses, organic farming and agricultural landscape features, in line with the Commission's recommendations of December 2020. These indicative national targets are related to selected EU-level Green Deal targets and set certain non-legally binding national targets ('national values') in the CSPs to reflect the aspirational EU-level targets set out in the Farm to Fork Strategy and Biodiversity Strategy.

To this aim, the Sub-SQs focused on whether the *ex ante* evaluation reports confirmed the following:

- › whether there is an intended contribution of the CSPs towards the selected EU-level targets arising from the Farm to Fork Strategy and Biodiversity Strategy;
- › whether there are shortcomings in the CSP design to contribute to the Green Deal objectives;

- › whether the CSPs have set non-legally binding 'national values' to reflect selective targets set out in the Farm to Fork Strategy and Biodiversity Strategy.

1.1.4.11 Analytical framework for SQ11. To what extent does the CSPs' environmental and climate architecture contribute to achieving environmental and climate ambition?

SQ11 examined whether the architecture of the CSPs contributes to the long-term national targets that are set in the national plans and strategies related to the Annex XIII legislation and whether the CSPs demonstrate environmental and climate ambition achieved through the environmental and climate architecture of the CSP.

Ambition is defined in relation to the previous programming period. Ambition can be understood in various ways (e.g. extent, spending, content, location, etc.). The *ex ante* evaluation reports should confirm if the following are identified in the CSP as an indication of higher ambition:

1. For area-based practices funded through interventions or required through conditionality, the following are indicative of higher ambition:
 - › the extent (area) targeted by the CSP and, for funded interventions, the targets for the future compared to results achieved in the current period, where such a comparison is possible;
 - › the spending relevant to the funded practices. However, this should be interpreted with caution, particularly in periods of high inflation and also in instances where other policies not funded by the CAP also contribute towards the environmental and climate ambition;
 - › the content or environmental value of the practice, which may have a higher impact;
 - › the adoption of more stringent environmental requirements for GAECs or eligibility compared to the previous GAECs or corresponding eligibility conditions;
 - › the location and extension of the territorial coverage of interventions to include previously excluded regions or territories or to target problem hotspots, especially those highlighted by relevant national plans, such as the River Basin Management Plans, the Nitrate Vulnerable Zone action plans, the National Adaptation Plan (NAP), the Flood Risk Management Action Plans, the Prioritised Action Frameworks for Natura 2000, etc.;
 - › the introduction of interventions addressing a 'known' issue with a completely new approach/procedure (for new interventions).
2. For non-area-based funded interventions (i.e. support for relevant investments, knowledge transfer, innovation, cooperation etc.), the issues revealing higher ambition are the same as for area-based funded interventions (extent, spending, content, location, stringent environmental requirements), but to the extent that area is substituted by beneficiaries or other relevant units of measurement (e.g. number of operations or territorial coverage).
3. Expected improvements concerning climate change, natural resources and environmental/biodiversity impact indicators.
4. If CSPs refer directly to long-term national targets or action plans, management plans, or related documents to legislation in Annex XIII.



1.1.5 Indicators

This section of the report presents the information collected from Annex I of the CSP. Article 115(1) of Regulation (EU) 2021/2115 indicates that Annex I of the CSP shall include “a summary of the main results of the *ex ante* evaluation referred to in Article 139 and the SEA referred to in Directive 2001/42/EC and how they have been addressed, or a justification as to why they have not been taken into account”. On this basis the EH has grouped the recommendations across four categories with an indicator allocated for each category allowing for the derivation of quantifiable data as follows:

- Indicator 1 (I1): the number of recommendations in Annex I that led to an update of the CSP.
- Indicator 2 (I2): the number of recommendations in Annex I with the information provided, but where it is unclear whether the CSP has been updated accordingly.
- Indicator 3 (I3): the number of recommendations in Annex I with the information provided, but with no resulting changes in the CSP.
- Indicator 4 (I4): the number of recommendations in Annex I, with no information provided on how the recommendations are addressed.

This provides for a systematic approach to measuring in a quantifiable manner and tracking the implementation of the *ex ante* (being referred to as recommendations), thus allowing for a comprehensive evaluation of the CSPs.

Regulation (EU) 2021/2289 lays down the rules for the application of Regulation (EU) 2021/2115 of the European Parliament and of the Council on the presentation of the content of the CSPs and the electronic system for the secure exchange of information. On this basis, it indicates that according to the elements of the CSP to be assessed in the *ex ante* evaluation, the recommendations shall be categorised as follow:

- SWOT analysis and needs assessment (SQ1 and SQ2);
- Financial instruments (SQ3);
- Intervention logic/contribution to objectives (SQ5);

- Allocation of budgetary resources (SQ6);
- External/internal coherence (SQ7);
- Output/result indicators and milestones (SQ8);
- Measures to reduce administrative burden (SQ9);
- SEA specific recommendations (SQ10 and SQ11);
- Other.

It also indicates that the Annex should clearly mention how the recommendations have been addressed or provide a justification for why they have not been taken into account.

Furthermore, given that some of the recommendations have been linked to SOs, a further categorisation has been applied as follows:

- Economic (SO1, SO2 and SO3);
- Environmental (SO4, SO5 and SO6);
- Societal (SO7, SO8 and SO9);
- Multiple Objectives (two or more SOs);
- CCOs;
- No classification provided.

[Table 2](#) lists the complete matrix of indicators that were collected from the analysis conducted in Annex I. The EH aggregated the indicators based on the types of recommendations and SO categories where necessary. Additionally, the recommendations varied in the level of detail and comprehensiveness across Member States. While a particular observation in one Member State was highly detailed and comprehensive, the same observation in another Member State might have been broken down into multiple ones. After thoroughly examining Annex I, the EH decided to express these indicators in relative terms, such as percentages, to accommodate this occurrence. These indicators provided valuable insights into the most emphasised aspects of the *ex ante* evaluation recommendations.



Table 2. Matrix of indicators built on Annex I recommendations

| | CSPs' SOs | Economic | Environmental | Societal | Cross-Cutting | Multiple Objectives | No Classification | TOTAL |
|-----------------------------------|--|-------------|---------------|-------------|---------------|---------------------|-------------------|-------------|
| Categorisation of recommendations | SWOT analysis, needs assessment | I1,I2,I3,I4 | I1,I2,I3,I4 | | | | | I1,I2,I3,I4 |
| | Intervention logic/contribution to objectives | I1,I2,I3,I4 | | | | | | I1,I2,I3,I4 |
| | External/internal coherence | | | | | | | I1,I2,I3,I4 |
| | Allocation of budgetary resources | | | | | | | I1,I2,I3,I4 |
| | Outputs, results and establishment of milestones and targets | | | | | | | I1,I2,I3,I4 |
| | Measures to reduce the administrative burden | | | | | | | I1,I2,I3,I4 |
| | Financial instruments | | | | | | | I1,I2,I3,I4 |
| | SEA specific recommendations | | | | | | | I1,I2,I3,I4 |
| | Other | | | | | | | I1,I2,I3,I4 |
| | TOTAL | I1,I2,I3,I4 | I1,I2,I3,I4 | I1,I2,I3,I4 | I1,I2,I3,I4 | I1,I2,I3,I4 | I1,I2,I3,I4 | I1,I2,I3,I4 |

Furthermore, it should be noted that there are instances, such as the case in Germany, where the recommendations have been presented in the *ex ante* evaluation report but a breakdown was not provided in Annex I. Also, the *ex ante* evaluation report for the BE-Flanders presented conclusions and recommendations which were not included in Annex I of the CSP, although reference is made to the *ex ante* evaluation report in Annex I. Therefore, the analysis which ensues from these indicators takes account of this data caveat and supplements analysis by delving further into the recommendations of the aforementioned *ex ante* evaluation reports.

In total, 1 868 recommendations were submitted as part of Annex I from a total of 28 CSPs (Table 3). The number of recommendations varies between Member States, with 199 recommendations for the Slovak CSP and 11 for the Lithuanian CSP.

The overall breakdown was as follows:

- Intervention Logic/contribution to objectives (SQ5): This category has the highest percentage of recommendations at 22%.
- SEA specific recommendations (SQ10 and SQ11): Closely following the first category, these recommendations comprise 21% of the total.
- SWOT analysis and needs assessment (SQ1 and SQ2): Representing 18%, this section focuses on the strengths, weaknesses, opportunities and threats identified in the CSPs, as well as the associated needs.
- Outputs, results and establishment of milestones and targets (SQ8): These recommendations comprise 13%.



- Other: Miscellaneous recommendations that fall outside the specific categories mentioned constitute 10%.
- External/internal coherence (SQ7): Ensuring the CSPs' alignment and consistency, both internally and externally, this category takes up 10% of the recommendations.
- Allocation of budgetary resources (SQ6): Recommendations specific to the budget allocation are relatively low, representing only 3%.
- Measures to reduce the administrative burden (SQ9): Suggestions on simplifying administrative tasks account for another 2%.
- Financial instruments (SQ3): Taking the minor portion, recommendations related to financial instruments comprise a mere 1% of the total.

Table 3. Number of recommendations and their impacts on the CSPs' drafting

| | Total number of recommendations | The number of recommendations in Annex1 that led to an update of the CSP. | The number of recommendations in Annex 1 with information on how the recommendation has been addressed, but with no resulting changes within the CSP. | The number of recommendations in Annex 1 with no information provided. | The number of recommendations in Annex 1 with information on how the recommendation has been addressed, but uncertainty on whether it has led to a change in the CSP |
|-------|---------------------------------|---|---|--|--|
| AT | 114 | 43% | 44% | 0% | 13% |
| BE-FL | 26 | 50% | 12% | 27% | 12% |
| BE-WL | 13 | 23% | 46% | 0% | 31% |
| BG | 146 | 46% | 40% | 0% | 14% |
| CY | 14 | 57% | 7% | 14% | 21% |
| CZ | 66 | 56% | 23% | 0% | 21% |
| DE | 71 | 32% | 45% | 15% | 7% |
| DK | 24 | 46% | 0% | 0% | 54% |
| EE | 132 | 53% | 37% | 0% | 10% |
| EL | 143 | 24% | 14% | 55% | 7% |
| ES | 138 | 63% | 18% | 0% | 19% |
| FI | 13 | 31% | 31% | 8% | 31% |
| FR | 27 | 44% | 22% | 33% | 0% |
| HR | 81 | 53% | 41% | 0% | 6% |
| HU | 108 | 11% | 84% | 0% | 5% |
| IE | 76 | 46% | 45% | 0% | 9% |
| IT | 29 | 62% | 14% | 0% | 24% |
| LT | 11 | 91% | 9% | 0% | 0% |
| LU | 19 | 37% | 26% | 0% | 37% |
| LV | 178 | 30% | 52% | 0% | 18% |
| MT | 21 | 57% | 24% | 0% | 19% |



| | Total number of recommendations | The number of recommendations in Annex 1 that led to an update of the CSP. | The number of recommendations in Annex 1 with information on how the recommendation has been addressed, but with no resulting changes within the CSP. | The number of recommendations in Annex 1 with no information provided. | The number of recommendations in Annex 1 with information on how the recommendation has been addressed, but uncertainty on whether it has led to a change in the CSP |
|-------|---------------------------------|--|---|--|--|
| NL | 37 | 54% | 24% | 0% | 22% |
| PL | 19 | 37% | 53% | 0% | 11% |
| PT | 14 | 79% | 0% | 0% | 21% |
| RO | 51 | 55% | 37% | 0% | 8% |
| SE | 31 | 6% | 74% | 0% | 19% |
| SI | 67 | 34% | 37% | 0% | 28% |
| SK | 199 | 42% | 26% | 2% | 30% |
| Total | 1868 | 42% | 36% | 6% | 16% |

1.1.6 Collection of data and quality checks

The EH also developed tools to support the synthesis and analysis activities implemented in the context of the study. These tools included a specific screening tool to enable GEs to extract information from the *ex ante* evaluation reports, a set of focus groups with *ex ante* evaluators and a targeted survey with the MAs.

1.1.6.1 Screening tool for GEs

The EH used a screening tool for the GEs⁵ to collect information from the *ex ante* evaluation reports (see [Annex 3](#) for an example) thus providing the EH with all the information required for answering the SQs and some information needed for the AQs. The structure was

based directly on the analytical framework presented in [Annex 2](#). The subsequent data analysis supported the synthesis of the *ex ante* evaluation reports, inferring the reports' effectiveness in terms of the elements cited in Article 139 of Regulation (EU) 2021/2115. It also supported the quantitative analysis of the contribution of the *ex ante* evaluations to the design process of the CSP.

Additionally, given the heterogeneity in the length and structure of the *ex ante* evaluation reports, the GEs were also asked to answer the following general closed questions, enabling the EH to draw some conclusions for the appraisal exercise (see [Table 4](#)).

Table 4. General questions on the *ex ante* evaluation reports

| Questions | Guidance |
|---|--|
| Does the <i>ex ante</i> evaluation have a clear structure? | Yes/No |
| Does each section of the evaluation report have a clear focus, and is finding the relevant information straightforward? | Yes/Some sections not all/No |
| How is the <i>ex ante</i> evaluation report structured? | By SOs/By interventions/Both by SOs and interventions/ By evaluation steps/If other, please specify |
| Does the <i>ex ante</i> evaluation report include all relevant requirements as set out in Article 139 of Regulation (EU) 2021/2115? | (Multiple choice question) Please select the relevant sub-paragraph of Art 139 |

5 This consisted of one Excel document with 13 spreadsheets (one readme guidance spreadsheet, 11 SQ spreadsheets – one for each SQ and one general questions spreadsheet). The EH team guided and supported the GEs also providing a guidance document. An introductory online meeting was held to present the objectives and the timeline of the study and a mandatory training session was held to ensure a shared understanding of the requirements of the exercise. The GEs were given three weeks to complete the screening exercise.



| Questions | Guidance |
|---|--------------------------|
| Was the <i>ex ante</i> evaluation report a living document, and has it been updated in light of the final submitted CSP? | Yes/No/Unclear |
| Was the <i>ex ante</i> evaluation framework developed in line with the <i>ex ante</i> ToolKit (Tools 2.1, 2.2, 3.1 etc.)? | Yes/Partially/No/Unclear |

1.1.6.2 Completeness and validity of inputs assessed

The synthesis was framed around 11 SQs, their associated sub-questions and JC. The responses to all synthesis sub-questions represented the primary input to the synthesis. The GEs assessed the JC by directly summarising the data sources and references from the *ex ante* evaluation, the SEA, and Annex I. This section describes the measures taken to ensure the 'completeness and validity of the inputs assessed'.

Completeness is the degree to which the synthesis includes all the necessary components to effectively assess each JC. In other words, the inputs used for the synthesis were considered complete if they thoroughly accounted for the *ex ante* exercises conducted and if the results of the *ex ante* and the SEA reports included all the essential components required.

Validity is the degree to which the data extraction processes and results accurately and reliably represented the *ex ante* and SEA

reports being studied. In other words, the input was considered valid if it depicted what it was intended to capture and if the outcome (input) obtained was trustworthy and could be used to synthesise all *ex ante* reports.

Assessing the completeness and validity of inputs was essential to ensure the accuracy and reliability of the synthesis. The steps to evaluate the completeness and validity of inputs are discussed in the following sections.

1.1.6.2.1 Check the completeness of the sources by setting up a team assigned to ensure quality control of the responses provided by the GEs

[Table 5](#) outlines the steps involved in checking the completeness of sources and ensuring quality control of the responses provided by the GEs.

Table 5. Steps to check the completeness of the sources and ensuring quality control of the responses provided by the GEs

| Step | Description |
|---------------|---|
| Step 1 | The GEs indicate whether, for each sub-question, the data sources for the synthesis provide information on the JCs and contain any references to the JCs, irrespective of whether these references were positive, negative or inconclusive. |
| | <ul style="list-style-type: none"> ➤ This filtering process results in a Yes/No response for each sub-question, indicating whether there is information available to answer the JC. ➤ If there is no information in any data source, the response is marked as 'No'. ➤ Multiple JCs may apply to a sub-question, so the filtering is done at a detailed level. |
| Step 2 | If the data source addresses the JC (answered 'Yes' in Step 1), the team records the level of satisfaction with the JC. |
| | <ul style="list-style-type: none"> ➤ The options are 'Satisfied,' 'Partially Satisfied' or 'Not Satisfied'. ➤ Determined based on explicit mention, comments, or need for revisions/disagreement. |
| Step 3 | The GEs are responsible for summarising the findings of the <i>ex ante</i> evaluation without introducing personal interpretation. |
| | <ul style="list-style-type: none"> ➤ To support their response in Step 2, the GEs provided a brief and neutral summary of the data source regarding the specific JC. ➤ This summary should avoid personal interpretation and present the information objectively. |
| Step 4 | In addition to the summary, the GEs provide a copy-paste of the data source discussing the JC. |
| | <ul style="list-style-type: none"> ➤ Precise referencing includes paragraph numbers, page numbers, or document references. ➤ Helps cross-check the degree of satisfaction and identify personal bias. |



1.1.6.2.2 Evaluate the validity of the input by checking the quality of the responses

Table 6 outlines the steps involved in evaluating the validity of the input by checking the quality of the responses. It focuses on ensuring the relevance of the summary, identifying potential biases, and addressing inconsistencies in the responses provided by the GEs.

Table 6. Process for evaluating validity of input and checking quality of responses

| Step | Description |
|---------------|---|
| Step 1 | Relevance and Bias Check |
| | <ul style="list-style-type: none">› Experts compare the GEs' summary to the data source extract.› Ensure the summary accurately reflects the data source without personal interpretation.› Cross-check the original language to identify misinterpretations between English and the original language. |
| Step 2 | Inconsistency Identification |
| | <ul style="list-style-type: none">› Experts search for inconsistencies in the responses.› Examples of inconsistencies.› JCs recorded as not addressed, but the information found in other answers.› Mismatch between the GEs' summary and the data source extract.› Promptly bring issues to the attention of the GEs for resolution.› GEs provide justifications for any discrepancies. |

It is important to note that the GEs were not asked to provide judgements on the SQs during the screening and interviews. Instead, the EH analysed their observations and collected data for assessment and analysis. These activities ensured a comprehensive and reliable appraisal process while maintaining impartiality and objectivity in the evaluation.

1.1.7 Dealing with data gaps and missing data

The EH understood data gaps as information that was available from the information sources (see Methodological approach, [Section 1.1.2](#)), but that the GE could not extract for various reasons. The section above explains how the EH has minimised such occurrences. Therefore, to the best of the EH's knowledge, the EH considers that it did not observe any data gaps.

There are various reasons for missing data and the results of the appraisal activities conducted in this study offer valuable insights into these reasons. In summary, the *ex ante* evaluation process varied significantly among Member States. Despite this, all Member States followed a multiphase approach for the *ex ante* evaluation, structured around the CSP chapters, and conducted in parallel with

the political decision-making process. As a result, only a few *ex ante* evaluations accurately reflected the final adopted CSP. Often more time was devoted to the context and needs assessment, with less emphasis on the intervention strategy, budget allocation and targets, as political decisions and changes were still being made in the second half of 2022. Additionally, evaluating the contribution of the CSPs to each SO can be carried out using several approaches, such as qualitative assessment, cost-benefit analysis, ToC or impact assessment, among others. All *ex ante* evaluation reports used a qualitative assessment approach and, in rare instances, assessed the potential impact of CSPs.

Most *ex ante* evaluators and/or the MAs have defined the scope of the *ex ante* evaluation in reference to Article 139 of Regulation (EU) 2021/2115. Therefore, the EH has developed tools and approaches to reveal the reasons behind the observed missing data. This is particularly important to ensure that the conclusions of this study are accurate and not misleading. Different tools and approaches, such as the screening tool, the two focus groups, the 27 targeted surveys for the MAs and additional ad-hoc activities, were used as complementary sources of information to assess the reasons for the observed missing data (see Methodological approach, [Section 1.3.3](#)).



1.2 Methodological approach for the appraisal

In addition to the 11 SQs, the EH developed four AQs covering four main topics (see Methodological approach, [Section 1.1.1](#)). Supplementary sub-questions and assessment criteria have been developed for each of the AQs (see [Annex 4](#)). Assessment criteria were used to guide the appraisal of the *ex ante* evaluations and to develop conclusions for each sub-question. The following sections present the scope of the appraisal exercise and discuss the understanding of each AQ and its analytical framework.

1.2.1 Scope of the appraisal

The EH also sought to assess the overall quality of the *ex ante* evaluations and identify good practices as well as areas for improvement. The AQs have been developed around four main topics:

- the completeness, comprehensiveness and coherence of *ex ante* evaluation reports;
- the process followed to conduct the *ex ante* evaluations;
- to what extent conclusions and recommendations provided have been taken into account in the CSPs; and
- identification of good practices and areas for improvement.

In summary, the AQs are as follows:

The first AQ, 'AQ1 To what extent are the *ex ante* evaluation reports complete, comprehensive and coherent?' aims to assess whether the *ex ante* evaluations include all mandatory elements specified in Article 139 of Regulation (EU) 2021/2115, whether they have followed a solid methodology and provided robust and comprehensive results based on quantitative and qualitative methods and up-to-date data. The question also explores the extent to which the *ex ante* evaluations were able to evaluate the contributions of the CSP to achieving the CAP SOs.

The second AQ, 'AQ2 To what extent was the *ex ante* evaluation conducted following an effective process?' aims to capture the framework of the *ex ante* process, such as the timing of the evaluation, the engagement of evaluators and other relevant stakeholders, regional and local authorities etc., in the evaluation process, and the level of cooperation between *ex ante* evaluators and the MA.

The third AQ, 'AQ3 To what extent have lessons learned from carrying out the *ex ante* evaluation and conclusions and recommendations from the *ex ante* report influenced the CSP?' focuses on assessing whether the *ex ante* evaluations were able to identify gaps and issues in the CSPs, the level of uptake of *ex ante* results into the CSPs and whether recommendations were taken into account in the preparation of the CSPs.

The fourth AQ, 'AQ4 What good practices from the *ex ante* evaluation reports can be identified across Member States?' uses the observations from the SQs and AQs to identify good practices across Member States.

1.2.1.1 Data sources

The following data sources were used to complete the appraisal:

- information derived from the screening of the *ex ante* evaluations (as for the synthesis);

- focus groups with evaluators to collect information which is outside the content of the *ex ante* evaluations and could fill potential data gaps;
- a targeted survey with MAs focusing on question AQ2 to capture the engagement process of relevant stakeholders; and
- CSPs where necessary to address missing data using machine search tools.

It is important to mention that the GEs and evaluators were not asked to provide any judgement relating to the AQs during the screening and interviews. Rather, the EH used the responses from the screening tool as well as additional data sources, as explained above, to address the AQs.

1.2.2 AQ1: To what extent are the *ex ante* evaluation reports complete, comprehensive and coherent?

Understanding and definition of AQ1 and breakdown into Sub-AQ1

This first AQ (AQ1) focuses on the completeness, comprehensiveness and coherence of the *ex ante* evaluations of the CSPs. Through several Sub-Appraisal Questions (Sub-AQs), the EH sought to understand the extent to which the *ex ante* evaluations influenced the design of the CSPs, the practices followed by the Member States in carrying out the *ex ante* evaluations and whether this process was conclusive in assessing the contribution towards the SOs.

Therefore, AQ1 is broken down into four sub-questions:

- To what extent were the *ex ante* evaluations complete?
- To what extent were the *ex ante* evaluations comprehensive and coherent?
- To what extent were the *ex ante* evaluations specific and considered the specific requirements for certain objectives?
- To what extent were the *ex ante* evaluations able to evaluate the contributions of the CSPs in achieving the SOs?

For the first sub-question, to analyse the completeness of the *ex ante* evaluations, the EH used a screening tool to extract the information required, as well as complementary data sources, including the MA survey and the focus group discussions. The goal was to determine whether the *ex ante* evaluations met the requirements of Article 139 of Regulation (EU) 2021/2115.

The second sub-question focused on the methodologies used for the *ex ante* evaluation and whether some evaluators went beyond what was required under Article 139 of Regulation (EU) 2021/2115.

The third sub-question sought to determine the extent to which *ex ante* evaluations were specific and considered national, regional and sectoral issues. EH used the screening tool to extract this information. In particular, this subset of the AQ used the analysis drawn from the screening tool to determine whether the *ex ante* evaluation reports considered national and regional specificities. Specifically, this section also sought to determine whether the *ex ante* evaluations appropriately evaluated the CSPs' intended contribution to the achievement of, and consistency with, the long-term national targets set out in, or derived from, the legislative acts listed in Annex XIII of Regulation (EU) 2021/2115.



Finally, the last sub-question investigated the extent to which the *ex ante* evaluations have fulfilled their aim in evaluating the CSPs' potential impacts and risks of failing to achieve the SO.

1.2.3 AQ2: To what extent was the *ex ante* evaluation carried out following an effective process?

Understanding and definition of AQ2 and breakdown into Sub-AQ2

This second AQ (AQ2) focuses on the process of carrying out the *ex ante* evaluation of the CSPs. Through several Sub-AQs, the EH sought to understand the extent to which conducting an *ex ante* evaluation influenced the design of the CSPs, what the practices of Member States were in conducting the *ex ante* evaluation and whether this process was inclusive.

AQ2 is broken down into three sub-questions:

- What was the process followed in conducting the *ex ante* evaluation?
- How did the *ex ante* evaluator interact with the MA?
- How were key stakeholders involved in the process of the *ex ante* evaluation?

Some of this information was extracted from the screening tool as submitted by the GE. However, most information was derived from the MA survey and the focus group discussions, with the analysis relying on both data sources to avoid any bias in the judgements made.

1.2.4 AQ3: To what extent did the lesson learned influence and shape the CSP?

Understanding and definition of AQ3 and breakdown into Sub-AQ3

This third AQ (AQ3) focuses on the shortcomings of the CSP identified in the *ex ante* evaluation report, the *ex ante* recommendations and the extent to which these recommendations shaped the overall quality of the CSP.

AQ3 is broken down into two sub-questions:

- To what extent did the *ex ante* evaluations have a positive and constructive role in identifying contradictions, deficiencies, gaps, missing obligations, etc.?
- To what extent were the conclusions and recommendations provided in the *ex ante* evaluation considered in the finalisation of the CSPs?

EH extracted the information required to answer the first sub-question via the screening tool. The EH considered recommendations which were provided in Annex I, but also possible recommendations which may have been made throughout the *ex ante* evaluation report and identified by GE during the screening process as relevant.

The second sub-question mainly drew on an analysis of the recommendations in Annex I, and this part of the analysis was undertaken by the EH. Recommendations were categorised according to the main headings of the *ex ante* evaluation requirements and grouped also by types of objectives as explained in Methodological approach, [Section 1.1.5](#). The analysis also delved

into the extent to which the information provided by the MAs on the recommendations led to changes or otherwise in the CSP. This sub-question was also answered through substantiated information collected through the MA survey and focus group discussions.

1.2.5 AQ4: What good (*ex ante*) evaluation practices can be identified across Member States?

Understanding and definition of AQ4 and breakdown into Sub-AQ4

The fourth AQ seeks to identify good *ex ante* evaluation practices. This AQ drew on an assessment of the abovementioned AQs, whereby best practices were considered in terms of:

- the structure and completeness of *ex ante* evaluation reports;
- the comprehensiveness and coherence of *ex ante* evaluation reports;
- how national (and regional) specificities and specific requirements for the SOs were taken into account.

Specific to the structure and completeness of the *ex ante* evaluation reports, an assessment was undertaken to isolate good practices going beyond the mandatory elements set out in Regulation (EU) 2021/2115.

Good practices were also sought in the methodology adopted for carrying out *ex ante* evaluation reports, such as the use of quantitative and qualitative approaches and the use of recent shifts and trends affecting the CSP. Also, best practices in how the *ex ante* evaluation reports have addressed national and regional specificities and sectoral approaches were identified.

The source for deriving these best practices is based on the analysis which was undertaken for AQ1 outlined above.

Best practices were also identified in terms of the following:

- processes for carrying out the *ex ante* evaluation report;
- interaction between evaluators and MAs;
- involvement of stakeholders.

These best practices were derived through the analysis of AQ2, whereby the sources of information are the focus groups with evaluators and the targeted survey with MAs. Key issues to be considered regarding the process for carrying out the *ex ante* evaluation report included the timing and the identification of dedicated structures set up for input and feedback. Furthermore, the type of stakeholder involvement in carrying out the *ex ante* evaluation was also considered.

Finally, best practices were also identified for:

- the identification of issues related to completeness, coherence and relevance, targets and milestones, budget allocations, and other relevant elements identified in the process of analysis;
- any recommendations which positively shaped the quality of the CSPs.

The best practices for these sub-questions were derived through the examination conducted for AQ3.



1.3 Additional activities undertaken

1.3.1 Focus group with evaluators

Focus groups were an additional tool used to collect information for the *ex ante* evaluations. The focus groups provided an opportunity for direct discussions with experts who were involved in the *ex ante* evaluations, providing the direct *ex ante* 'on the ground' experience that complemented the analysis and the quality assessment carried out by the EH. To conduct the focus group discussions, a structured discussion guide was set up with a series of open-ended questions to address the objective of the study.

1.3.1.1 Participants

Table 7. Participating Member States per focus group

| Focus Group 1 | 4 April 2023 (10.00-12.00) |
|---------------|----------------------------|
| Member State | |
| Poland | |
| Germany | |
| Malta | |
| Sweden | |

The focus groups sought to collect information that was not included in the *ex ante* evaluations and to allow for the provision of information to address the AQs. In total, 17 participants took part in the focus group discussions, covering evaluators from 16 Member States (Table 7). Two focus group discussions were held in April 2023. Both focus group discussions were held online. After the focus groups were held, the information was transcribed to analyse the information.

| Focus Group 2 | 6 April 2023 (14.00-16.00) |
|---------------|----------------------------|
| Member State | |
| Austria | |
| Estonia | |
| Poland | |
| Netherlands | |
| Hungary | |
| Germany | |
| Cyprus | |
| Belgium | |
| Slovakia | |
| France | |
| Lithuania | |
| Luxembourg | |
| Latvia | |

The two focus groups were structured around the analytical framework presented in the Methodological approach, Section 1.1.4. The main conclusions of the focus groups are presented in Annex 5. The focus groups addressed all questions in a direct conversational style. The evaluation experts were asked to share their practical experience and illustrate it with concrete examples. The results have been used in the analytical assessment of this report.



1.3.2 Targeted survey with MAs

The targeted survey with the MAs provided a counterpoint to balance the evaluators' views and aimed to explore the experiences of the MAs and obtain their feedback on preparing the *ex ante* evaluation reports and how this process was coordinated with the overall design process of the CSPs for the 2023-2027 programming period.

The design of the questionnaire was discussed internally to ensure accurate data collection so that results were suitable to be interpreted and generalised. Question types varied between open and closed questions with the use of the Likert Scale. Furthermore, questions were drafted in a clear, concise and easy to understand manner, with an emphasis on avoiding leading or biased questions. The survey was sent to all MAs, with the questionnaire available online for a month.

Each MA received an individual invitation to complete the survey with the access link. In summary, the survey gathered the MA's point of view regarding the extent to which they considered the *ex ante* evaluation reports to be complete, comprehensive and coherent. Also, it explored the *ex ante* preparation process and to what extent the *ex ante* recommendations shaped the CSP. The estimated time for completing the survey was between 30-40 minutes. The MAs were requested to provide their answers in English. The survey was sent to MAs representing each of the CSPs. In total 27 responses were received such that only one MA did not answer the survey. The details of the targeted survey for the MA are set out in [Annex 6](#).

1.3.3 Other activities

1.3.3.1 Mapping comprehensiveness of answers to the SQs and the completeness of the *ex ante* evaluation report

Methodological approach, [Section 1.1.7](#) presents the rationale for distinguishing JCs that are linked to Article 139 of Regulation (EU) 2021/2115 or those that are not. Based on these two categories, the EH generated EU maps to assess the comprehensiveness of answers provided to each SQ and the completeness of the *ex ante* evaluation reports.

The analysis and synthesis of the evaluation theme section presents an EU map for each SQ, indicating whether, according to evaluators, the CSPs provided a comprehensive answer to the SQ. The CSPs could belong to one of the following categories: 'Good', 'Fair', 'Poor', and 'Missing'. If all JCs linked to Article 139 were satisfied, plus at least one other JC, the CSPs are classified as 'Good'. If only two-thirds of the JCs linked to Article 139 were satisfied, the CSPs are classified as 'Fair'. If more than two-thirds of the JCs linked to Article 139 were not satisfied, the CSPs are classified as 'Poor'. For the SQs where none of the JCs reflected the requirements outlined in Article 139 (SQ10 and SQ11), the CSP is classified as 'Good' when at least 50% of the JCs are satisfied, 'Fair' when at least 25% of the JCs are satisfied, and 'Poor' when below 25%. When information was missing and did not allow the EH to derive any conclusions, the CSPs are classified as 'Missing', and additional information is provided in the corresponding section.

The [appraisal of the *ex ante* evaluation reports](#) Section presents an EU map for the relevant SQs, indicating whether the *ex ante* evaluation was comprehensive enough to respond to the SQ. To do so, only JCs reflecting the requirements outlined in Article 139 were used and the *ex ante* evaluation reports could belong to one of the following categories: 'Fully', 'Partially', or 'Missing'. If all the JCs linked to Article 139 were assessed by the *ex ante* evaluation reports (and whether or not the corresponding CSPs satisfied them), the reports are classified as 'Fully'. If at least one JC was missing, the report is classified as 'Partially'. If none of the JCs were assessed, the report is classified as 'Missing'.

The maps were produced using the ArcMap 10.8 software and the administrative boundaries of the Geographic Information System of the Commission.

1.3.3.2 Ad-hoc activities to understand the reasons behind missing information

- Performing systematic keyword searches on the final approved CSPs and related annexes.

For instance, references to lessons learned from the past programming period were weak for certain assessment themes. Therefore, the EH defined a list of keywords in the original language of the CSPs, such as 'lessons learned,' 'best practices,' and 'experience' to identify the paragraphs and page numbers containing these keywords. Then, the EH was able to verify the nature of the information found in the CSPs and conclude whether the missing information stemmed from the *ex ante* evaluation report or the CSPs.

- Email exchanges on specific issues with evaluators.

In some cases, it was important to provide additional opportunities for the evaluators to explain the reasons why the information was missing, specifically when it was related to requirements linked to Article 139 of Regulation (EU) 2021/2115.

- Verification of whether missing information was due to missing information in the information source or the CSPs themselves, using the results from the 'Mapping and Analysis of CSPs for 2023-2027' study.

In some instances, the mapping study was used to contextualise some of the results. For example, the use of financial instruments was optional for Member States and the final decision to use them or not was not always taken at the time when the *ex ante* evaluation was carried out. Therefore, the mapping study helped the EH to understand which Member States used financial instruments in their final CSPs. In other instances, the study helped the EH to better understand how the final CSPs responded to obligations linked to Article 108 of Regulation (EU) 2021/2115, or to determine the presence or absence of national value targets related to the Green Deal targets.



2. Analysis and synthesis of the evaluation themes

The analysis follows a consistent structure for each SQ and it is presented by the EH as follows:

- › A EU map showing the extent to which the SQs have been answered comprehensively by the *ex ante* evaluation reports and illustrating the extent to which the evaluators addressed the JC for each CSP.
- › The synthesis of the main findings answering the SQ and a description of the completeness and nature of missing information. On the latter, complementary activities have been undertaken to address missing information only for the JC that reflected the mandatory requirements set out in Article 139 of Regulation (EU) 2021/2115. Reasons for missing or incomplete information for the JC that do not directly reflect elements in Article 139 of Regulation (EU) 2021/2115 are provided when available in the information sources.
- › The most common recommendations drawn by evaluators: Where available, the indicators derived from the recommenda-

tions set out in Annex I of the CSP (see Methodological approach, [Section 1.1.5](#)) are described for the corresponding SQs. In other words, quantitative results are provided for SQ2, SQ3, SQ5, SQ6, SQ7, SQ8 and SQ11. For SQ11, recommendations derived from the SEA are used. It should be noted that for SQ1, SQ4, SQ9 and SQ10, which Annex I does not specifically cover, the analysis of the recommendations is based on the derivation of information from the screening tool, as carried out by the GEs.

An overview of the outcomes of the data collection can be found in [Annex 2](#). The section maps the information collected from the 11 SQs, their corresponding Sub-SQs and the accompanying JC. The EH distinguishes between three clusters of countries: 1) countries with no information available to answer the JC; 2) countries where the JC is satisfied; and 3) countries where the JC is satisfied to various extent.

2.1 Assessment of the context and needs

2.1.1 SQ1: To what extent is the context and SWOT analysis based on recent evidence and does it take into account experiences gained from implementing the CAP in previous programmes?

2.1.1.1 Key findings from *ex ante* reports

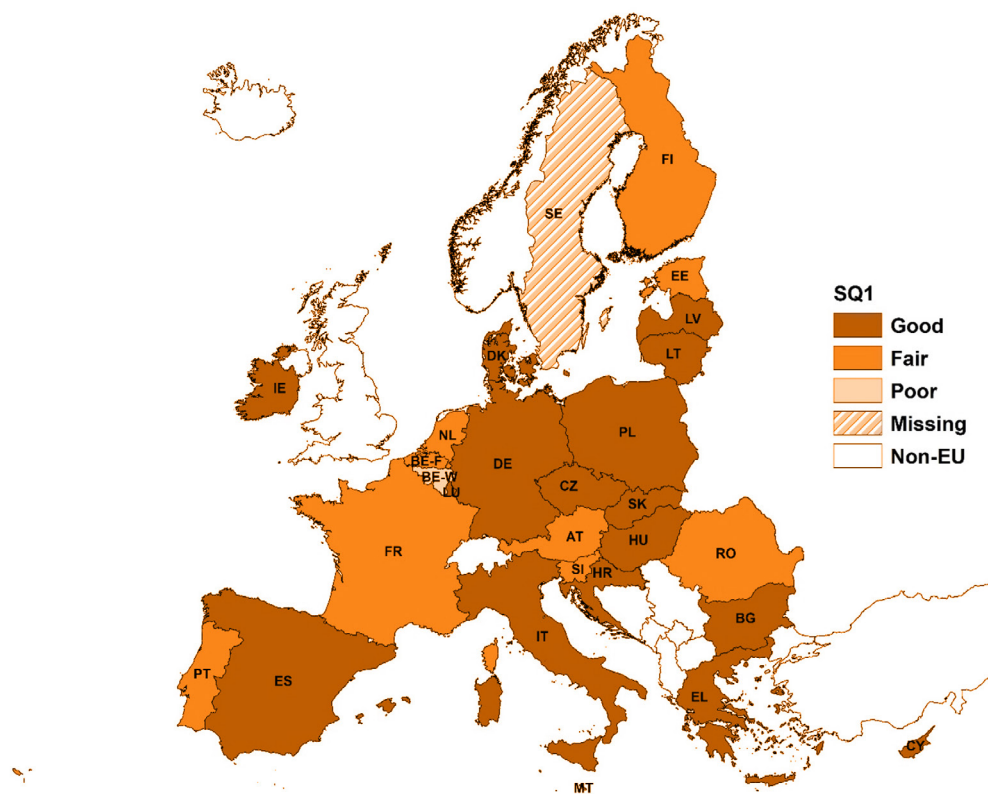
- › The context and SWOT analyses proved to be essential tools involving a significant effort made to collect and assimilate a huge amount of detailed data, information and studies.
- › 26 *ex ante* evaluation reports concluded that context and SWOT analyses are fairly based on recent evidence and take into account experiences from the past programming period.
- › Despite the efforts made, the context and SWOT analyses, were often perceived as inconsequential and overly technical, making it challenging for their key elements to effectively inform policymaking.
- › 18 *ex ante* evaluation reports identify data gaps which could hinder and restrict the completeness and comprehensiveness of particular issues in the context and SWOT analyses.
- › Recommendations were made as regards the use of more recent or more specific data, misplaced SWOT elements and the rationale behind deriving certain SWOT items.
- › The siloed approach across SOs highlighted by evaluators has hindered the achievement of an integrated and holistic perspective throughout the CSP.

2.1.1.2 Analysis

[Map 1](#) shows that 26 *ex ante* evaluation reports confirmed that the context and SWOT analyses are assessed at least as 'Fair' in terms of the extent to which they are based on recent evidence and take into account experiences from the past programming period.



Map 1. To what extent do the *ex ante* evaluation reports conclude that the context and SWOT analyses are based on recent evidence and take into account experiences gained from implementing the CAP in previous programmes?



Source: European Evaluation Helpdesk for the CAP (2023)

All evaluation reports except the one for Sweden confirmed that the context and SWOT analyses of the CSPs provided a comprehensive picture of the current situation in agriculture and rural areas. The Swedish *ex ante* evaluation report contained no substantial reference to the SWOT analysis because the *ex ante* evaluators assessed the SWOT analysis in an initial evaluation stage, separate from the main *ex ante* exercise. All SWOT analyses were carried out for each SO, covering all the relevant data and information required to derive the Member States' current economic, social and environmental situation, progress and outlook in territorial and sectoral domains. The context and SWOT analyses also focused on external conditions, shifts and trends that could impact the situation described. Taking into account the volume of work for the context and SWOT analyses, there were some areas of incoherence and uncertainty identified by *ex ante* evaluators. These addressed mainly two issues. First, there were SWOT elements (strengths, weaknesses, opportunities or threats) that were weak or not linked to the context analysis (e.g. DE, HU, IT, SI). Second, there were a few cases where a factor was misplaced between the concepts of strength and opportunity or between weakness and threat (e.g. EL, FI). The majority of these remarks in the above-mentioned CSPs were identified in relation to the environmental and social dimensions. [Figure 5](#) in the analysis of SQ2, below shows that environmental and societal recommendations account for 42% of the combined SWOT and needs assessment recommendations.

In all but two of the SWOT analyses (BE-WL and EE), detailed broken-down data is presented to at least fairly satisfying degrees to highlight specific territorial or sectoral circumstances. The *ex ante* evaluation reports emphasised that the CSPs employed

specific consultation plans and processes to extract and further refine sectoral and territorial characteristics, drawing on the knowledge and experience of individuals in the regions and sectors. For instance, the Flemish *ex ante* evaluation report made explicit and extensive reference to the public participation processes during the SWOT analysis. To harvest sector-specific knowledge and perceptions, they hosted five separate events that actively involved stakeholders from the vegetable and fruit, ornamental plants, arable, beef and veal, poultry and eggs sectors.

The *ex ante* evaluation reports confirmed that SWOT analyses were evidence-based in all but four CSPs (BE-WL, FI, RO, SE - for more information, see Analysis and synthesis of the evaluation themes, [Section 2.1.2](#)). For these 24 CSPs, they provided the most recent and relevant evidence from reliable and credible organisations, including all context indicators, the data and information in the analytical factsheets and relevant indicators emanating from the Commission. The Bulgarian *ex ante* report highlighted the fact that the CSP's SWOT collected and utilised data going beyond standard context indicators or Eurostat statistics to include, for example, data from Streamlined European Biodiversity Indicators or the UN Sustainable Development Goals. A frequently encountered recommendation concerned how up-to-date some context indicators were and whether the context analysis could have attempted to update them and other Common monitoring and evaluation framework (CMEF) indicators also by utilising data from IACS or recent evaluations (DK, DE, EE, LV, PL, PT, SI) and more specifically those carried out within the framework of the AIR 2019. For example, the Danish *ex ante* report pointed out that several context indicators were missing or outdated, which were subsequently updated by the Danish Agency



for Agriculture. In Germany, the *ex ante* evaluator highlighted that some context indicators were missing or outdated, but most importantly, pointed out that variables for the presentation of the socio-economic and political framework were absent.

Ten *ex ante* evaluation reports (AT, BE-FL, BE-WL, FI, FR, MT, NL, RO, SE, SI) did not make any reference to the use of lessons learned from previous implementation periods of the CAP in the context or SWOT analysis of the CSPs, while one *ex ante* report (PT) found that the existing reference to lessons learned was not satisfactory. The remaining 17 *ex ante* evaluation reports (BG, CY, CZ, DE, DK, EE, EL, ES, HR, HU, IE, IT, LT, LU, LV, PL, SK) confirmed that lessons learned were taken into account by the context or SWOT analyses of the CSPs (see [Annex 2](#)). These lessons learned referred to any kind of experience gained across all CAP instruments in the previous programming period that was recorded and analysed and could be used in the context analysis to point out or highlight a strength or threat. This could be, for example, the rates of adoption of various measures by farmers and the reasons for observed low adoption.

Where lessons learned were present, evaluators verified that they were documented and referenced and usually taken from the most recent evaluation studies such as those carried out in the framework of the enhanced AIR 2019. For example, the Danish Agricultural Agency did not limit its knowledge to its own experience but extended lessons learned to the experience gained by other agencies, such as the Danish Environmental Protection Agency, the Danish Transport or the Housing and Planning Agency, in implementing measures and actions in the previous programming period. In Slovakia, the *ex ante* evaluation report concluded that some of the lessons learned referenced in the SWOT analysis came directly from specialised and narrow evaluation studies of measures, e.g. the evaluation of Areas facing natural or specific constraints (ANCs), as well as broader studies, such as the national evaluation of Pillar I measures. The German *ex ante* report presented and assessed the use of lessons learned in the context and SWOT analyses by SO and used a matrix to depict that this was fulfilled for SO1, SO2, SO3, SO5, SO6, SO7 and partly fulfilled for SO4, SO8 and SO9. In Bulgaria, the *ex ante* evaluation verified that lessons learned mainly referred to evaluation studies carried out for the CMEF. The Polish CSP extensively presented past experiences, for example, the lessons learned from the first application of financial instruments.

All SOs except SO1 and SO9 were well addressed in terms of lessons learned, as witnessed by the Estonian *ex ante* evaluation report. Evaluators provided many and varied reasons for not using the lessons learned systematically and exhaustively. One reason is the lack of analysed, documented and referenced reports from lessons learned. This is why *ex ante* reports, such as the Slovak, Bulgarian, Polish and German ones above, refer to CSPs tapping into their own experience gained through evaluating the previous programming periods. The lack of lessons learned was mainly related to SO9, SO8 and to a lesser degree to SO4. This may also be related to the greater lack of data for issues dealt with by SO9 and SO8 as discussed below.

In 18 CSPs (see [Annex 2](#)), the *ex ante* evaluation reports identify data gaps which could hinder and restrict the completeness and comprehensiveness of particular issues in the context and SWOT analyses. In most cases, Member States developed a strategy to fill these gaps, especially when they pertained to context indicators. The prevailing approach to filling data gaps was to use additional

indicators or data from alternative sources, where available. However, some CSPs, such as the Italian CSP, did not encounter any data gaps and therefore did not consider this aspect. Similarly, certain CSPs acknowledged that specific gaps did not hinder the analysis or recognised that it would not be feasible to address data scarcity in the short-term. For example, in Hungary, the *ex ante* evaluation report established that the sparseness of environmental monitoring data prevented the SWOT from relying on quantitative data other than emissions. As observed in Estonia, data gaps were more frequent in policy areas that have gained attention in the reform such as social issues, digital transition, biosecurity and animal welfare. Additionally, the evaluators of the French CSP mentioned that there was a lack of data on issues related to transformations in rural society, regulatory measures, fiscal and social aspects, fair trade and other similar subjects, meaning that the SWOT could not be considered as evidence-based in these areas.

Ex ante evaluators noted that conducting in-depth context and SWOT analyses for each SO helped identify and analyse the key factors influencing the agricultural sector. However, in some CSPs, this approach, i.e. concentrating efforts on the technical side of data collection and analysis and conducting the analysis per SO, had two potential drawbacks. First, the emphasis on gathering the best possible data and information for each one of the issues under each one of the SOs, sometimes diverted attention from the primary purpose of the context analysis, which was to provide an evaluative judgement based on the data. The German *ex ante* evaluation report noted that although the context analysis was very 'fact-rich' overall, there was occasionally a lack of evaluative statements on the information presented. Evaluative statements are necessary to support the justification of selected needs. Consequently, in some cases, the context analysis resulted in an inconsequential and overly 'technical' presentation of trends and situations, lacking discussion, explanation, or a narrative that would illustrate the economic, social, or environmental aspects behind the data, and help the key evidence and facts stand out from the analysis. Second, the focus of the context and SWOT analyses on each SO encouraged a siloed approach in the design of the CSPs, lacking a holistic view (BE-WL). This fragmentation was an obstacle to achieving an integrated, cross-SO perspective for the entire CSP, or for a General Objective (GO), a sector or a territory.

2.1.1.3 Completeness and information missing

The completeness of *ex ante* evaluation reports and an assessment of missing information related to SQ1 can be examined based on Article 139 of Regulation (EU) 2021/2115 and the provisions of Article 115(2) of Regulation (EU) 2021/2115 on the SWOT analysis.

- > The context and SWOT analyses are based on the current situation of the area covered by the CSPs and are comprehensive, complete and coherent.

Only the *ex ante* evaluation report of Sweden did not provide detailed information on the context and SWOT analyses. In Sweden, the context and SWOT analyses were performed by the MA and reviewed by the evaluators of the *ex ante* evaluation team, but in a separate study outside the *ex ante* exercise. In total, the Swedish evaluators made 149 recommendations for changes and further development of the SWOT and needs assessment, to which the MA provided answers and revised their SWOT and needs assessment accordingly.



- The SWOT and context analyses provide a comprehensive picture, covering all the relevant information available in the Member States, including an analysis of territorial aspects, regional specificities and sectoral aspects.

In addition to the Swedish *ex ante* evaluation report, whose case is explained above, the *ex ante* evaluation reports for Wallonia (Belgium) and Estonia did not contain any reference to specific regional or sectoral treatment in the CSPs. Since the CSP for Wallonia is regional, it is clear why the *ex ante* report did not cover this aspect to the same extent as other CSPs. However, there is no reference in the *ex ante* report of sectoral specificities or territorial aspects, if they exist. The Estonian *ex ante* evaluation report made no reference to territorial or sectoral specificities. Nevertheless, the approved CSP discusses and justifies, in several SOs, the absence of both territorial and sectoral specificities. For example, in the SWOT for SO1, the CSP states that 'Basic income support is paid to ensure stable incomes for farmers. The implemented income support scheme is not regionally differentiated, as there are no distinct and clear regional socioeconomic differences'.

- Take into account lessons learned from previous implementation of the CAP.

Regarding lessons learned from past experiences, these have been taken into account to the extent possible in SWOT and needs analyses. However, the evaluators identified shortcomings in how the impact of previous programmes has been monitored and evaluated, both at EU and national levels.

Missing information concerning the use of lessons learned in CSPs was encountered in 10 *ex ante* evaluation reports (AT, BE-FL, BE-WL, FI, FR, MT, NL, RO, SE, SI). An inquiry was launched to ascertain whether the missing information was because the CSP did not utilise lessons learned or because the information sources of this study, especially the *ex ante* evaluation report, overlooked the issue and did not address it. The CSP and related annexes to the SWOT were also consulted, and a number of keywords were used to find the relevant information (see Methodological approach, [Section 1.2.3](#)). For the 10 *ex ante* evaluation reports with missing information, evidence shows that they did not contain any information indicating whether lessons learned had been examined, documented and referenced.

For example, neither the Dutch *ex ante* evaluation nor the SEA report referred to using lessons learned in the Dutch CSP. The Dutch CSP itself makes several undocumented references to the utilisation of lessons learned e.g. the effect of direct income support in the starch sector on farm incomes (Dutch approved CSP, p. 263) or the lessons learned from agri-environmental schemes applied by collectives (p. 618). Still, these references are neither complete, quantified nor linked to a study or research outcome. In the case of the Finnish CSP, the *ex ante* evaluation was carried out on a programme document

that did not include a context analysis. The SWOT analysis was only a list of factors without a comprehensive background document with specific references and data sources.

In the case of Romania, the *ex ante* evaluation report did not provide any information on lessons learned. When consulting the CSP of Romania, the SWOT analysis for SO8 briefly mentioned the experience gained by public authorities, farmers and companies in implementing projects and by LAGs in managing local development strategies. However, these references were not further detailed or documented and, thus, cannot be considered as 'documented' and 'referenced' lessons learned. In Slovenia, the SWOT analysis for each SO was presented in separate annexes. For SO7, for example, the *ex ante* evaluation report noted that references were made to experiences gained from the implementation of the RDPs in 2007-2013 and 2014-2020 and that lessons learned were correctly presented. Similarly, for Austria, the separate annex on the SWOT analysis provided additional clarification. It stated that experiences were used as a basis for the data, particularly highlighting the significant experience already gained with climate-relevant support measures during the 2014-2020 RDP period. In both cases, the claim whereby lessons learned were considered is not substantiated by evidence, nor was it explained how lessons learned were taken into account.

For the remaining four cases (BE-FL, BE-WL, FR, MT), neither the *ex ante* evaluation nor the SEA reports or the CSPs explicitly referenced lessons learned from previous programming periods.

2.1.1.4 *Ex ante* evaluation recommendations

The majority of the recommendations provided by evaluators on the SWOT assessment focused on three key issues, as derived from the synthesis exercise conducted by GE⁶. First, evaluators often found an inaccurate identification of whether a particular aspect should be considered as strength, weakness, opportunity or threat. This confusion was especially prominent when distinguishing between these three aspects in Bulgaria, Estonia and Slovenia. For example, Estonia's evaluator recommended that the opportunities and risks in the SWOT table should be reviewed. Second, evaluators frequently suggested that certain driving forces identified under one SO should also be attributed to other SOs. This recommendation was relevant for SO4, SO5 and SO6. For example, in the case of Portugal, for SO6, the evaluator suggested that the agricultural intensity indicator⁷ should rather be a context indicator in SO2. Lastly, evaluators emphasised the need for more robust evidence and especially more updated context indicators, as well as more explicit connections between the SWOT elements and the context analysis (ES and NL). In the case of Spain, the evaluator supported the usefulness of investigating the causes of different aspects set out in the context analysis so that the conclusions obtained are useful for decision-making in the design of the strategy and interventions.

6 The category of recommendations presented in Annex I classifies the SWOT and needs assessment as one category. Consequently, the analysis from Annex I is presented in SQ2.

7 In Portugal, the intensity indicator is calculated as follows: expenditure on inputs (fertilisers, phytopharmaceuticals and feed purchase) per hectare divided by the price index of inputs.



2.1.2 SQ2: To what extent are the needs well defined, prioritised and based on evidence from the context and SWOT analysis?

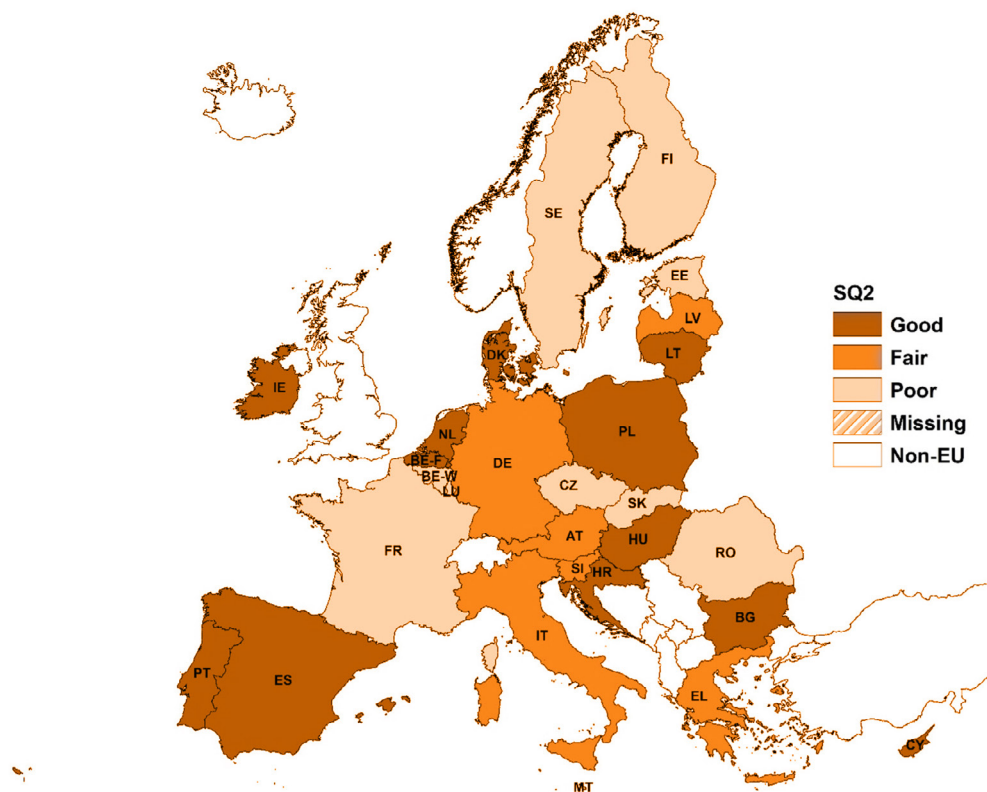
2.1.2.1 Key findings from *ex ante* reports

- Overall, the identified needs were found to be generally well rooted in the context and SWOT analyses, showing a robust input-output logic with only a few cases of evident misalignment with the analyses and the identified needs.
- However, only about half of the CSPs linked the identified needs with the environmental and climatic plans outlined in Annex XIII of Regulation (EU) 2021/2115, such as the National Climate Action Plan, the Nitrates Action Programme and the National Biodiversity Action Plan.
- The *ex ante* evaluation reports confirmed that needs prioritisation followed a well-described methodology in most cases, with clear and transparent criteria and classification processes. Yet, few evaluations concluded that the employed methodologies did not meet expectations.
- Inaccuracies were found in several CSPs in relation to ambiguously named needs and indirect connections between the identified needs and the context and SWOT analyses.
- The needs assessment process fell short in adequately addressing three areas: (a) gender-specific issues; (b) fair distribution of direct payments, and (c) the integration of lessons learned from previous programming periods.

2.1.2.2 Analysis

Map 2 shows that 18 *ex ante* evaluation reports confirmed that the needs are assessed at least as 'Fair' in terms of the extent to which they are well defined, prioritised and addressed regional and local specific needs (for the detailed methodology to generate maps, see Methodological approach, [Section 1.2.3](#)).

Map 2. To what extent do the *ex ante* evaluation reports conclude that the needs are well defined, prioritised and based on evidence from the context and SWOT analysis?



Source: European Evaluation Helpdesk for the CAP (2023)

The *ex ante* evaluation reports revealed that 27 CSPs effectively connected the needs assessment to evidence from the context and SWOT analyses. The *ex ante* evaluator for the Belgium-Wallonia CSP concluded that the link between the needs assessment, the SWOT and the context analysis was not initially established. This was subsequently partially revised. Regarding the 27 other evaluations,

the evaluators noted that particularly successful approaches used clear methods and visual tools to establish the links between needs, SWOT elements and contextual evidence. For instance, the Irish, Spanish and Greek CSPs used tables and matrices to visually represent and demonstrate these connections at both the SO and Sub-SO levels.



However, considering the wide range of needs covered by the CSPs and the thorough scrutiny of the needs and SWOT analyses during the *ex ante* evaluation, several CSPs were found to contain inaccuracies. These inaccuracies arose from ambiguously named needs and less obvious or indirect connections between the identified needs and the context and SWOT analyses (AT, DE, FI, FR, HR, IT, LU, LV, SK, SL). In specific instances, the *ex ante* evaluation reports highlighted that the justification for individual needs and the SWOT analysis varied depending on the SO they applied to (SI). In some instances, the *ex ante* evaluators claimed that a restricted number of needs appeared to be linked to SWOT elements without clear justification (IT, LU, HU, PL, SI, SK, SE).

The *ex ante* evaluation reports confirmed that in almost all CSPs, the formulated needs were comprehensive, complete and specific (for a detailed breakdown of CSPs, see JCs of SQ2.3 in [Annex 2](#)). In many CSPs, the needs were also addressed geographically (BE-FL, BE-WL, BG, DK, EL, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, SI, SK). For example, in Spain and France, the evaluators reported that the CSPs considered specific and detailed conditions that were described and justified very well in the SWOT analysis, addressing different geographical areas and also well indicated in the SWOT matrix. For the Italian CSP, the evaluator assessed that 62% of the needs were explained in a detailed way, including a geographic dimension for some of them. The rest is described in less detail. In Poland, the *ex ante* report verified that the CSP addressed specific national, regional and local needs and highlighted the particular needs of certain territories.

Only 15 *ex ante* evaluation reports indicated that the CSPs linked the identified needs with the environmental and climatic plans outlined in Annex XIII of Regulation (EU) 2021/2115 (BE-FL, BG, CY, DK, EL, ES, FR, HR, HU, IE, LT, MT, NL, PL, PT, see also [Annex 2](#)). For instance, the *ex ante* evaluator in Flanders (Belgium) reported that the CSP linked the identified needs to the Biodiversity strategy. Similarly, the Irish CSP considered policies associated with broader climate action, environmental initiatives, and the sustainability agenda, such as the National Climate Action Plan, the Nitrates Action Programme and the National Biodiversity Action Plan. Likewise, evaluators confirmed that the CSPs in Bulgaria, Cyprus and Lithuania identified the national environmental and climate legislation, strategic documents and plans that were in line with the identified needs. Only two *ex ante* evaluation reports also specified that the CSPs included a gender-specific needs assessment. Hungary's CSP incorporated gender-specific elements in SO8, focusing on generational renewal and the establishment of young farmers. The CSP for Malta made a connection to relevant sectoral strategies, including one explicitly addressing 'Gender Equality and Mainstreaming'.

All approved CSPs include a table titled '2.1 Assessments of Needs and Intervention Strategy', where they present the prioritised needs for each SO. The *ex ante* evaluations found differences in the prioritisation process, which varied in complexity, ranging from elaborate and complex methodologies to simpler approaches. For example, the *ex ante* evaluator in Bulgaria discussed how the CSP categorised needs into four primary categories, ranging from low to very high priority, based on four main criteria: 'urgency', 'political importance', 'efficiency', and 'applicability'. The evaluator suggested that involving relevant stakeholders in confirming or adjusting the initial ranking, as done in the Spanish CSP, could have further enhanced this process. The *ex ante* evaluation report for the Spanish CSP also demonstrated how needs were categorised according to four general prioritisation criteria and one territorial criterion across

the 17 Autonomous Regions. The Finnish CSP used three criteria – 'need', 'the role of the CAP' and 'political importance' – with several sub-categories under each criterion. Both the Spanish and Finnish CSPs grouped together the needs of the SOs at the GO level and prioritised them at this level to derive an additional perspective.

Five *ex ante* evaluators indicated that the prioritisation process and the methodology chosen in some CSPs did not fully meet expectations (BE-FL, CY, DE, NL, RO). For the CSPs in Flanders (Belgium), Germany, Romania and the Netherlands, *ex ante* evaluators noted that further elaboration or explanation of the chosen method was desirable. In Cyprus, a satisfactory result was achieved after rearranging the prioritisation and adding a revised table for needs. Three *ex ante* reports commented on the prioritisation methodology and found it to be unacceptable (BE-WL, FR, SK). The French *ex ante* evaluators argued that the CSP's choice to propose only two prioritisation categories was not justified, while the decision-making processes for classification into one of the two categories were not explicitly described, making the whole process unacceptable. Finally, in three *ex ante* evaluation reports, there was no information about the methodology followed to prioritise the needs (EE, MT, SE).

The *ex ante* evaluation reports confirmed that all but five CSPs had included all needs, irrespective of whether they were addressed by the CSP or not. Four CSPs did not include all the identified needs in their prioritisation process (BE-WL, BG, FI, RO). In the CSP for Luxembourg, the *ex ante* evaluation, while acknowledging that many needs that are not addressed by the CSP are well described (especially in relation to the Agricultural Knowledge and Information System (AKIS)), noted that the widespread lack of needs particularly for environmental and climate issues, leads to the failure of this criterion in the CSP.

Through direct references, the evaluators confirmed for nine CSPs (BG, CZ, DK, ES, HU, IE, IT, LT, LU) that lessons learned were considered for the needs assessment. The Bulgarian *ex ante* evaluator provided evidence from the CSP that lessons learned had been taken into account when defining needs regarding SO8, and a table was provided on the experiences from earlier programmes listing all the documents reviewed, and relevant overall conclusions and recommendations were also included. The *ex ante* report noted that the Danish CSP occasionally referenced calculations and investigations from former programming periods, while the evaluator of the Spanish CSP mentioned specifically how the lessons learned regarding the environmental aspects were incorporated.

In other CSPs, e.g. in Cyprus and Poland, lessons learned referenced in the SWOT analysis were not repeated in the needs assessment exercise. By contrast, in the Romanian CSP, previous experience is documented throughout the design and intervention logic sections and not specifically in the needs assessment or the SWOT analysis section.

For SO1, an assessment of needs in relation to a fairer distribution and more effective and efficient targeting of direct payments and in relation to risk management (Article 108 of Regulation (EU) 2021/2115) should have been undertaken by the CSPs. From the *ex ante* evaluation reports, only 13 confirmed that this specific element had been addressed in the corresponding CSPs (AT, BE-FL, BG, CY, DE, DK, EL, HR, IE, LV, NL, PL, SI). Only the Estonian *ex ante* evaluation concluded that there was no specific analysis of the need for coupled direct support and redistribution of payments and that the analysis of the role of risk management was insufficient. In the



case of redistributive payments, potential impacts on the winners and losers, compared to the previous programming, should have been researched and justified. The 13 *ex ante* evaluation reports which examined this issue highlighted the different approaches adopted by the CSPs. For example, the evaluation of the CSP in Flanders (Belgium) presented internal calculations based on a regression analysis showing that smaller farmers lost substantial income regarding payment entitlements. Therefore, a focused need and commitment were put forward for a more even and targeted distribution of direct income support to these target groups. In Bulgaria, the *ex ante* evaluation showed how the CSP considered the need for a fairer distribution and more effective and efficient targeting of direct payments in its context and SWOT analyses and the assessment of identified needs. The evaluator of the German CSP showed how the plan focused on risk exposure and the need for risk management in agriculture, similar to the Greek CSP, which contained an extensive report on risk management issues.

There were 14 *ex ante* evaluation reports which did not provide any information about a fairer distribution of direct payments or risk management (BE-WL, CZ, ES, FI, FR, HU, IT, LT, LU, MT, PT, RO, SE, SK). In order to determine whether no reference to the issue implies that this is not considered in the CSP or overlooked by the *ex ante* evaluators, early and indicative results were used from the 'Mapping and Analysis of CAP Strategic Plans for 2023-2027' study.

The need to 'Reduce income disparity with the rest of economy and between sectors, farm sizes, different areas' in SO1 is present in 23 CSPs and is closely linked to the need in SO2 referred to as 'Need for support specific sectors or farm sizes'. Indeed, 15 CSPs have identified the need to support specific sectors or farm sizes under SO2 (BE-WL, BG, CZ, EE, EL, ES, FI, FR, LT, LU, LV, PT, RO, SE, SK). Out of these 15 CSPs, nine (BE-WL, CZ, ES, FI, LT, PT, RO, SE, SK) are among those for which the *ex ante* evaluation reports did not provide any information. A tentative explanation is that *ex ante* evaluators searched for this issue in SO1, but when they came across it in SO2, they overlooked it. In addition, the same study reveals that the needs related to 'risk management' are addressed to a lesser extent in the CSPs in comparison to 'income support' (fully covered in 71% of cases and fully or partially covered in 89% of cases). In essence, only four CSPs did not adopt a risk management tool out of the six that did not identify the need to adopt one (AT, BE-WL, CY, DE, LU, RO), as the German and Romanian CSPs actually programmed a risk intervention tool.

2.1.2.3 Completeness and information missing

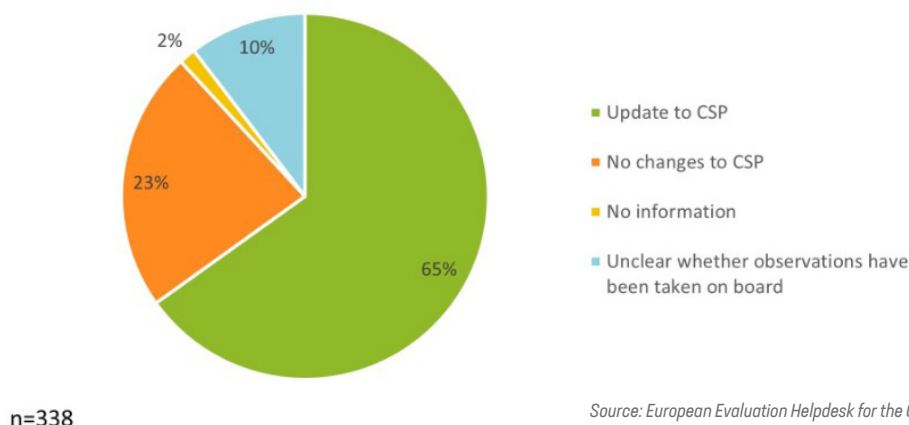
All the *ex ante* evaluation reports confirmed that the CSPs identified needs related to each SO and, in general, that these needs were clearly shown to be derived from the SWOT analysis, with the exception of the CSP in Wallonia (Belgium). Also, taking account of the *ex ante* recommendations, in all CSPs, the overwhelming majority of needs followed logically from the SWOT analysis, with valid and plausible arguments justifying this relationship. Only three *ex ante* evaluation reports did not address the prioritisation of needs in terms of developing a ranking methodology and linking the ranked needs to SOs (EE, MT, SE). The only issue with extensive missing information concerned lessons learned, where the *ex ante* evaluation reports of 18 out of the 28 CSPs did not provide any information (AT, BE-FL, BE-WL, CY, DE, EE, EL, FI, FR, LV, MT, NL, PL, PT, RO, SE, SI, SK). Of these 18 *ex ante* evaluation reports, ten are the same as those that did not report on lessons learned for the context and SWOT analyses in SQ1 (AT, BE-FL, BE-WL, FI, FR, MT, NL, RO, SE, SI). However, the remaining eight (CY, DE, EE, EL, LV, PL, PT, SK) *ex ante* evaluation reports provided an account of lessons learned in the context and SWOT analysis sections and did not repeat or enrich them for the needs assessment.

Finally, with regards to the 14 *ex ante* evaluation reports that did not provide any information on a fairer distribution of direct payments or risk management (BE-WL, CZ, ES, FI, FR, HU, IT, LT, LU, MT, PT, RO, SE, SK), the study 'Mapping and Analysis of CAP Strategic Plans for 2023-2027' showed that the respective CSPs responded to such needs under SO2. Given the multiple meanings of fairer distribution and targeting support by farm size, sector or even territory, all CSPs have adopted this need. Only four CSPs did not adopt a risk management tool.

2.1.2.4 Ex ante evaluation recommendations

Annex I of the CSPs, which provides a list of recommendations from the *ex ante* evaluation reports, considers the SWOT analyses together with the needs assessment. In this regard, a total of 338 recommendations were made in the Annex on both the SWOT analyses and needs assessments reflecting 18% of the total recommendations. Of these, 65% led to an update of the CSP, the highest proportion across the different sections of the *ex ante* evaluation recommendations (Figure 4).

Figure 4. Induced changes based on recommendations on the SWOT and needs assessment



Source: European Evaluation Helpdesk for the CAP (2023)

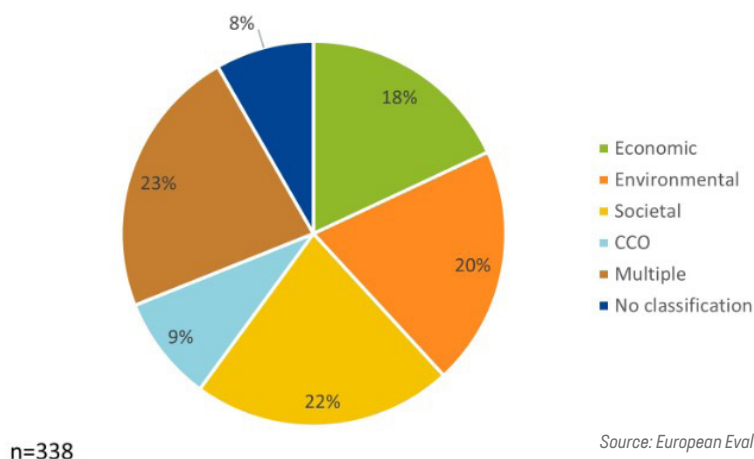


In addition, information on the respective recommendations was provided in the Annex for 33% of the recommendations. However, it is unclear whether the recommendations led to effective changes in the CSP. For 2% of the recommendations, the MA did not provide any information on how or whether the recommendation was taken into consideration in the CSP.

A further breakdown of the recommendations by type of objective, as presented in Figure 5, indicates that the highest number of recommendations were made for the environmental and societal objectives, followed by recommendations for multiple objectives.

Some of the recommendations focused on improving the use of context indicators across the SOs to strengthen the justification of the needs. A number of recommendations focused more intently on the clarity between individual elements in the SWOT analysis and the needs assessment serving as the basis for developing the intervention logic. This also led to recommendations on the prioritisation of needs, including, in some instances, the requirement for prioritisation of the needs to facilitate their traceability throughout the CSP. In certain instances, recommendations were also made on lessons learned for them to be considered when defining the needs.

Figure 5. Recommendations on SWOT and needs assessment by types of objectives



2.1.3 SQ3: To what extent is the use of financial instruments financed by the EAFRD justified?

2.1.3.1 Key findings from *ex ante* reports

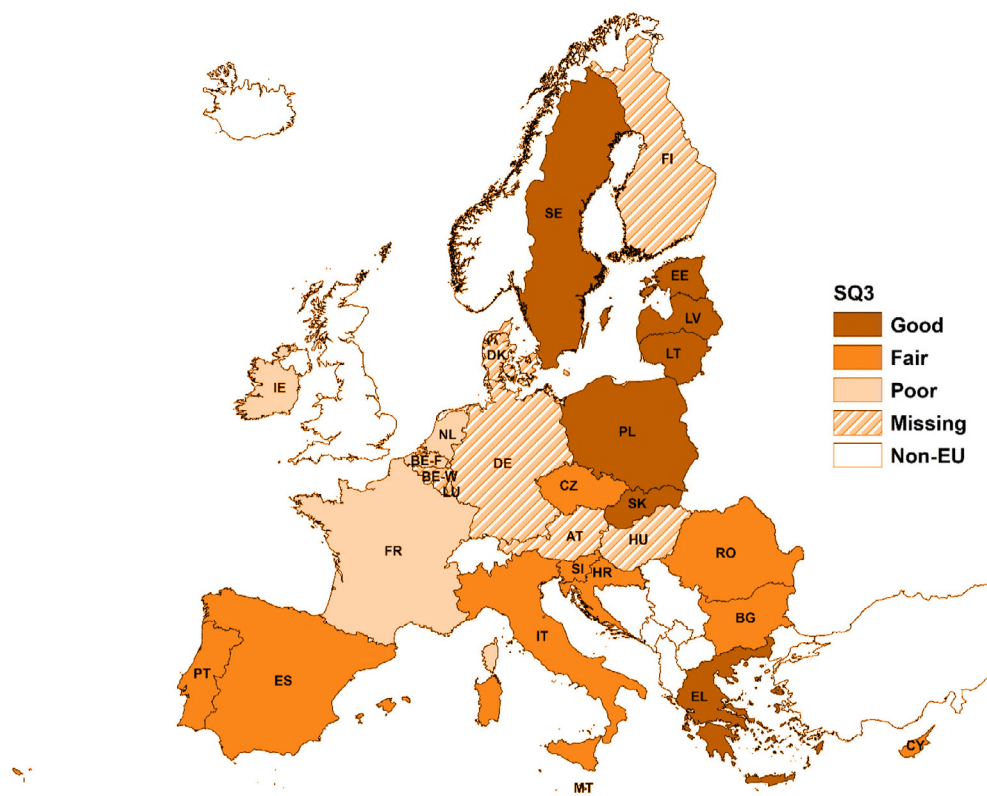
- > The use of financial instruments is limited to 13 CSPs, with almost all of them providing evidence-based justifications for their choice.
- > Out of the 15 CSPs that did not adopt financial instruments, seven *ex ante* evaluation reports concluded that CSPs did not justify this decision.
- > The complementarity of financial instruments with grant schemes supported by the CSP was rarely examined in the CSPs. No CSP makes use of the InvestEU Programme, and very few evaluators even refer to InvestEU.
- > Very few recommendations (about 1%) were directly related to financial instruments; out of these, only about one-third led to an update of the CSP, with the most common recommendation being about providing more information on the allocation of financial instruments.

2.1.3.2 Analysis

Map 3 shows that out of the 13 CSPs using financial instruments (BG, EE, EL, ES, FR, HR, IT, LT, LV, MT, PL, PT, SK), 12 are assessed at least as 'Fair' in terms of the extent to which they justified and provided relevant evidence for their use. Additionally, some CSPs provided justification for the non-use of financial instruments.



Map 3. To what extent do the *ex ante* evaluation reports conclude that the use of financial instruments financed by EAFRD is justified?



Source: European Evaluation Helpdesk for the CAP (2023)

The potential use of financial instruments in many CSPs was a point of discussion for a long period, and decisions were taken very late, sometimes after the submission of the final *ex ante* evaluation. Each approved CSP contains part 4.6 of chapter 4 on 'Financial Instruments' with Sub-section 4.6.1 'Description of the Financial Instrument'. A comparison of the evidence provided in the *ex ante* evaluations revealed a slight discrepancy from what is recorded in the approved plans. For example, the *ex ante* evaluation report noted that "Sweden will introduce financial instruments" but that "the CSP lacks details on how exactly the proposed loan guarantee system will work". In the end, Sweden did not adopt any financial instrument (Swedish-approved CSP, p. 164). Malta's *ex ante* evaluation report makes no reference to the use of financial instruments, but the approved CSP contemplates the use of financial instruments in the future after extensive research and collaboration with development banks and institutions. In the case of Czechia, the *ex ante* evaluation was based on a separate *ex ante* assessment of the use of financial instruments in Czechia. This study identified areas where the financial instruments would be suitable and fully justified, but the approved CSP did not adopt financial instruments.

Thus, according to the approved CSPs, 13 have used or intend to use financial instruments (BG, EE, EL, ES, FR, HR, IT, LV, LT, MT, PL, PT, SK), and 15 have chosen not to use financial instruments (AT, BE-FL, BE-WL, CY, CZ, DE, DK, FI, HU, IE, LU, NL, RO, SE, SI). In this section, for reasons of coherence and completeness, the CSPs using financial instruments are those that declare their use or intention to use

them in their approved CSP. The discussion on the SQ and the JCs is based on the information provided in the *ex ante* evaluation reports.

Of the 13 CSPs using financial instruments, all *ex ante* evaluation reports confirmed that the evidence justifying the use of financial instruments was provided. Twelve *ex ante* evaluation reports confirmed that the proposed use of financial instruments is justified based on the analysis of market gaps, funding needs, and SWOT elements (BG, EE, EL, ES, FR, HR, IT, LV, LT, MT, PL, SK). It is sufficient for a CSP to use or to declare its intention to use financial instruments and to document the reasons and needs without implementing a full *ex ante* analysis on the topic. Specifically for the use of financial instruments, Article 58(3) of Regulation (EU) 2021/1060⁸ states that "Appropriate support from the Funds through financial instruments shall be based on an *ex ante* assessment drawn up under the responsibility of the MA. The *ex ante* assessment shall be completed before MAs make programme contributions to financial instruments". Even though *ex ante* evaluation of financial instrument reports can be drawn at a later stage, some *ex ante* evaluation reports revealed that the justifications provided for the use of financial instruments were evidence-based. For instance, in Latvia, the evaluation report showed that the CSP contains general provisions for the use of financial instruments, with more detailed information provided in the description of each financial instrument. The descriptions of interventions also provide information on the indicators planned to be achieved with the use of soft loans. For Latvia, it was also confirmed that the types and

8 Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 Laying Down Common Provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy.



main conditions of financial instruments were detailed in the descriptions of interventions, with a clear link indicated between the financial instrument and its contribution to the planned outputs and outcomes. In the case of Estonia and Greece, the general characteristics and the targeted groups of the financial instruments were well specified. However, as most evaluators pointed out (except for Latvia), the complementarity of financial instruments with grant schemes supported by the CSP was rarely or only superficially examined. From this remark, one should also exclude Slovakia's CSP, which had already implemented a dedicated *ex ante* assessment for financial instruments.

In some cases, the use of financial instruments for specific interventions left gaps and unanswered questions highlighted by the evaluators. For example, in France, the *ex ante* evaluation report noted that only "a few brief explanations are provided describing why some interventions are offered financial instruments". The cases of Portugal and Malta are more specific. In Portugal, financial instruments will be used only in the Autonomous Region of Madeira and only associated with specific interventions. In Malta, the *ex ante* evaluation did not assess the use of financial instruments as they were not foreseen at the time.

Regarding the 15 CSPs that did not adopt financial instruments, eight *ex ante* evaluation reports (BE-FL, CY, CZ, IE, NL, RO, SE, SI) commented on their non-use. For the CSPs in Flanders (Belgium), Ireland, Romania and the Netherlands, evaluators pointed to the presence of identified needs for financial instruments and therefore recommended that the CSPs should justify how these needs are addressed and from which specific instruments outside the CSP. As noted above, Czechia carried out an *ex ante* assessment specifically for financial instruments but did not adopt any. The *ex ante* evaluations of Cyprus and Slovenia called for the provision of information on financial instruments outside the CSP to justify their non-use despite the identified needs. In Slovenia, the *ex ante*

evaluation stated that financial instruments were expected to be set up in 2023 with national funds in the form of a guarantee or loan, including subsidising the interest rate. For Sweden, the *ex ante* evaluators seem to have performed their evaluation on a draft CSP where financial instruments were planned. Therefore, their conclusions are not taken into account. For Finland, the *ex ante* evaluation did not provide any information on the justification for not using financial instruments, but the approved CSP contains very extensive explanations.

The CSPs do not foresee the use or the transfer of funds to the InvestEU Programme. Although the CSPs do not offer specific justifications, sporadic references are made indicating that in the event of a need for financial instruments, a preference would be given to the use of financial tools available under the CAP.

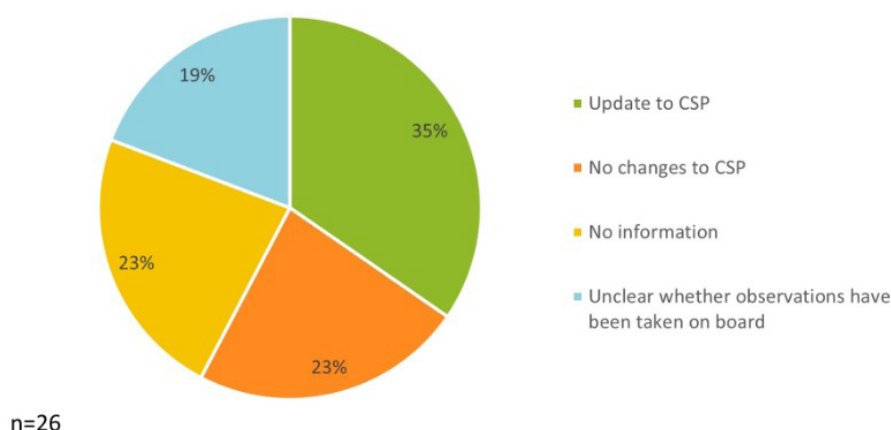
2.1.3.3 Completeness and information missing

An interpretation of Article 139 of Regulation (EU) 2021/2115 indicates that the *ex ante* evaluation shall assess "where relevant, the rationale for the use of financial instruments financed by the EAFRD". This limited the scope of *ex ante* evaluations only to those CSPs which planned to introduce a financial instrument. Thus, of the 15 CSPs that did not use financial instruments, seven *ex ante* evaluations do not discuss any arguments justifying non-use. The driving factor for the eight CSPs that did not use financial instruments, but provided justification for non-use, is the existence of needs calling for the adoption of financial instruments.

2.1.3.4 Ex ante evaluation recommendations

On the basis of the information collected through Annex I of the CSPs, it can be seen that very few of the recommendations (about 1%, or just 26) were directly related to financial instruments. Of these, 35% led to an update of the CSP, while for 23% of the recommendations, no changes were made to the CSP (Figure 6).

Figure 6. Induced changes based on recommendations on financial instruments



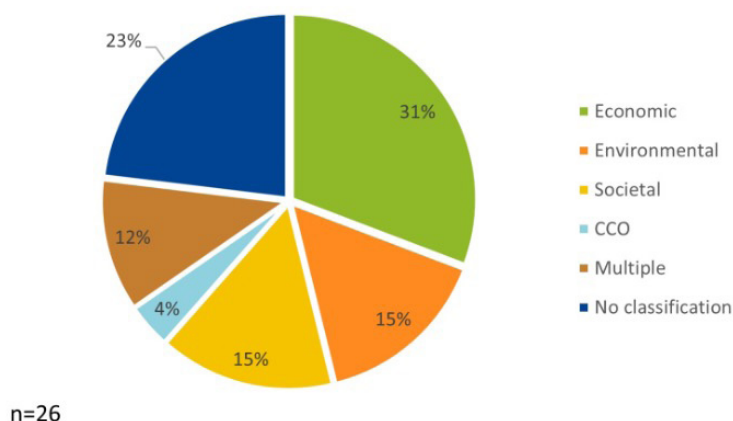
Source: European Evaluation Helpdesk for the CAP (2023)

The recommendations are distributed across different SOs depending on the SO to which the financial instruments would be linked (Figure 7). In general, the recommendations that were addressed in the CSP called for more information on the allocation of financial instruments, particularly on the planned unit values and the number of units planned, as well as for more focused implementation, such as on categories of young farmers.

On the other hand, the one recommendation which was noted, but not addressed in the CSP was on the provision of financial instruments to address the *Liaison Entre Actions de Développement de l'Économie Rurale* (LEADER) in Latvia.



Figure 7. Financial instruments recommendations by types of objectives



Source: European Evaluation Helpdesk for the CAP (2023)

2.2 Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) and consistency of the allocated resources as well as the suitability of the selected targets and milestones

2.2.1 SQ4: To what extent do the designed interventions respond to the identified national and regional needs?

2.2.1.1 Key findings from *ex ante* reports

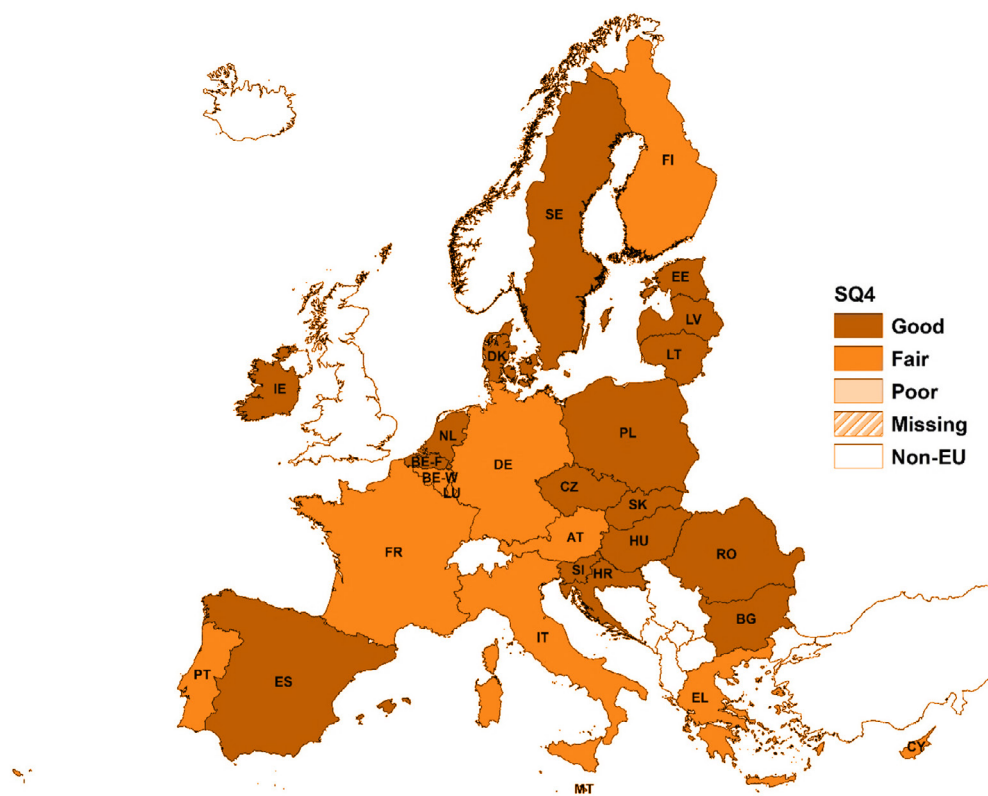
- All *ex ante* evaluations, except for Luxembourg, generally confirmed the overall consistency of the proposed intervention strategies, the identified needs and the expected contribution of the assigned SO.
- The vast majority of evaluators considered the designed interventions to be at least fairly aligned with the identified needs.
- There is room for improvement in terms of providing more precise intervention logic, more detailed eligibility conditions and justification of regional disparities.
- While the majority of CSPs appear to rely on lessons learned, ten *ex ante* evaluations did not provide information on whether past experiences were accounted for.
- Interventions related to SO4, SO5 and SO6 should take into account lessons learned from past programming periods, notably interventions from Pillar II.

2.2.1.2 Analysis

Map 4 shows that all *ex ante* evaluation reports confirm that the designed interventions are assessed at least as 'Fair' in terms of the extent to which they are responding to the identified national and regional needs.



Map 4. To what extent do the *ex ante* evaluation reports conclude that the designed interventions respond to the identified national and regional needs?



Source: European Evaluation Helpdesk for the CAP (2023)

For 27 out of the 28 CSPs, the *ex ante* evaluators confirmed to a fairly satisfying degree that the overall consistency between the proposed intervention strategy, including interventions' eligibility conditions, definitions, and conditionality, delivered a significant positive impact to the identified national and regional needs, as well as the intended contribution to the different SOs. Only in the case of Luxembourg did the evaluators note that, given the draft CSP of Luxembourg (the *ex ante* evaluation of Luxembourg was based on an early draft of their CSP, see Introduction, [Overview of the ex ante evaluation process](#)), the overview of the intervention strategy under each SO was not always sufficient to fully understand the subsequent intervention logics, as well as the causal chain linking the interventions to the expected effects.

Regarding the soundness of the intervention logic, according to the evaluators, all CSPs, excluding Luxembourg, at least fairly satisfy the JC. In some instances, the evaluators emphasised the need for further analysis. For example, eligibility conditions were not considered or discussed in the CSPs of France, Croatia, Slovakia and Sweden. In Germany, evaluators requested a revision of the intervention logic under SO7. Additionally, in most cases, the *ex ante* evaluators, without questioning the intervention strategy, expressed doubts, or pointed out incomplete or inadequate representation of certain SOs. Evaluators often confirmed the presence of a causal link between the intervention logic and SOs, but noted that this could be further strengthened by incorporating more robust technical knowledge, clearly stating the potential impacts, or defining eligibility conditions more precisely. For Luxembourg - the only *ex ante* where the requirements outlined in Article 139 of Regulation (EU) 2021/2115 were not fully satisfied - the evaluator mentioned that the intervention logic did not always give a clear and precise

vision of the main expected effects under each SO, as well as the chain of causalities linking the interventions to the expected effects. In addition, the evaluator stated that it was not explicit how the interventions responded to each of the needs, as the list of needs was finalised at a late stage.

In addition to providing a thorough description of the intervention logic, the vast majority of evaluators (the same 27 CSPs mentioned above) considered the designed interventions to be at least fairly aligned with the identified needs. Some evaluators requested further explanation as to why certain interventions were offered to a greater extent in some regions and not in others. For instance, in Germany and Latvia, evaluators asked for additional justifications linking interventions to identified regional needs. In cases where the need was national, but the CSP offers varying levels of regional support, evaluators suggested referencing other existing policy instruments outside the CSP which address this need, notably regional policy. In Flanders (Belgium), evaluators noted that the list of interventions was quite extensive, which in some cases could lead to under-budgeted interventions or weak contributions to the achievement of the strategic objectives. The novelty of certain interventions, such as certain eco-schemes (for example, the buffer strips or crop rotation eco-schemes) in Flanders (Belgium), made it challenging to estimate the required budget and, consequently, the expected outputs. In Greece and Bulgaria, evaluators asked for further clarification on how the designed interventions, particularly those related to the environment and climate, interacted with conditionality.

In 18 CSPs (BE-FL, BG, CZ, DK, EE, ES, HR, HU, IE, LT, LU, LV, NL, PL, RO, SE, SI, SK), evaluators believed that lessons learned from past programming periods had been satisfactorily considered,



although there was room for improvement. For example, a dedicated section in the CSP could have ensured that lessons learned were comprehensively taken into account (BG), or there may be a lack of sufficient information for some SOs (RO and SI).

2.2.1.3 Completeness and information missing

The *ex ante* evaluations of 10 CSPs (AT, BE-WL, CY, DE, EL, FI, FR, IT, MT, PT) did not report whether the lessons learned from addressing national or regional needs with past interventions, their eligibility conditions and definitions had been considered when designing the intervention strategy, and whether these are documented or referenced in the CSP. For instance, some evaluators commented (CY) that this might be due to missing information that may become available later. In Finland, evaluators noted that most interventions were very similar to past ones. However, the lack of details regarding their eligibility conditions, which were due to be defined at the national level at a later stage, might significantly impact intervention adoption compared to past programming periods.

To determine whether the missing information was indeed due to the CSP not using lessons learned or because the *ex ante* evaluation did not have the necessary information in time or overlooked the topic and did not address it, the final CSP was consulted, and a number of keywords were used to find the relevant information (see Methodological approach, [Section 1.2.3](#)). In 10 CSPs, lessons learned from past interventions could be found for addressing national and regional needs.

In this regard, lessons learned were used to build on the success of past interventions and to improve on them, if necessary. An example can be found in the Austrian CSP, which leveraged the positive experiences gained from the voluntary agri-environmental programme implemented in the previous period. Besides allocating a larger budget, it will also build on the experience of the existing agri-environmental programme to ensure planning security for farmers (Austrian-approved CSP, p. 347). A similar finding can also be found in the Italian CSP, where the importance of continuity with past interventions was cited in the different regions. In addition, the French CSP takes into account the experience of past programming periods in terms of redistributing payments for a fair distribution and strengthened targeting of income support. Considering the significant redistributions that have already been implemented in recent years, the French CSP has chosen to continue its internal

convergence of basic income support in the continuity of the previous programming (French-approved CSP, p. 238).

In Greece, lessons were learned from previous programming periods on how the LEADER programme should be improved to strengthen the dimension of innovation, multifunctionality and circular economy in the agri-food sector (Greek approved CSP, p. 1036) and address regional needs. For Portugal, the support for extensive production systems has been recast on the basis of past experience to also better meet the needs and objectives of the intervention (Portuguese approved CSP, p.391).

Additionally, lessons learned from previous periods were also considered to determine the relevance of certain interventions to be included in the CSP. This was the case for Germany, where experience from previous funding periods has shown that bureaucratic burden and the high risks of incurring costs make support for forest-related measures in the CAP unattractive. Therefore, measures in the forestry sector are largely supported outside the CAP (German-approved CSP, p. 81).

Nevertheless, the vast majority of identified lessons learned in the CSPs involved maintaining similar planned unit amounts and eligibility conditions as for previous interventions (e.g. BE-WL, CY, FI, MT).

2.2.1.4 *Ex ante* evaluation recommendations

As no categories are defined in Annex I of the CSPs reflecting SQ4, it is not feasible to provide quantitative insights. Nevertheless, evaluators often recommended that interventions related to SO4, SO5 and SO6 should take into account lessons learned from past programming periods, notably past interventions from Pillar II (PT, SK). For example, Slovakia's evaluator recommended that they should be provided with records of the discussions carried out between the partners of the AKIS Working Group in order to be able to use past experience and lessons learned to achieve AKIS objectives. Another recurrent recommendation from evaluators was to better address regional needs in the design of interventions (DE, ES). For example, Germany's evaluator suggested addressing regional disparities through targeted interventions that consider the specific needs and potential of different regions. Finally, another recurrent recommendation is to better specify the interactions of interventions and their eligibility criteria with the conditionality requirements.

2.2.2 SQ5: To what extent are the CSP interventions, their eligibility conditions, definition and conditionality requirements consistent with each other and work in synergy to achieve the objectives coherently?

2.2.2.1 Key findings from *ex ante* reports

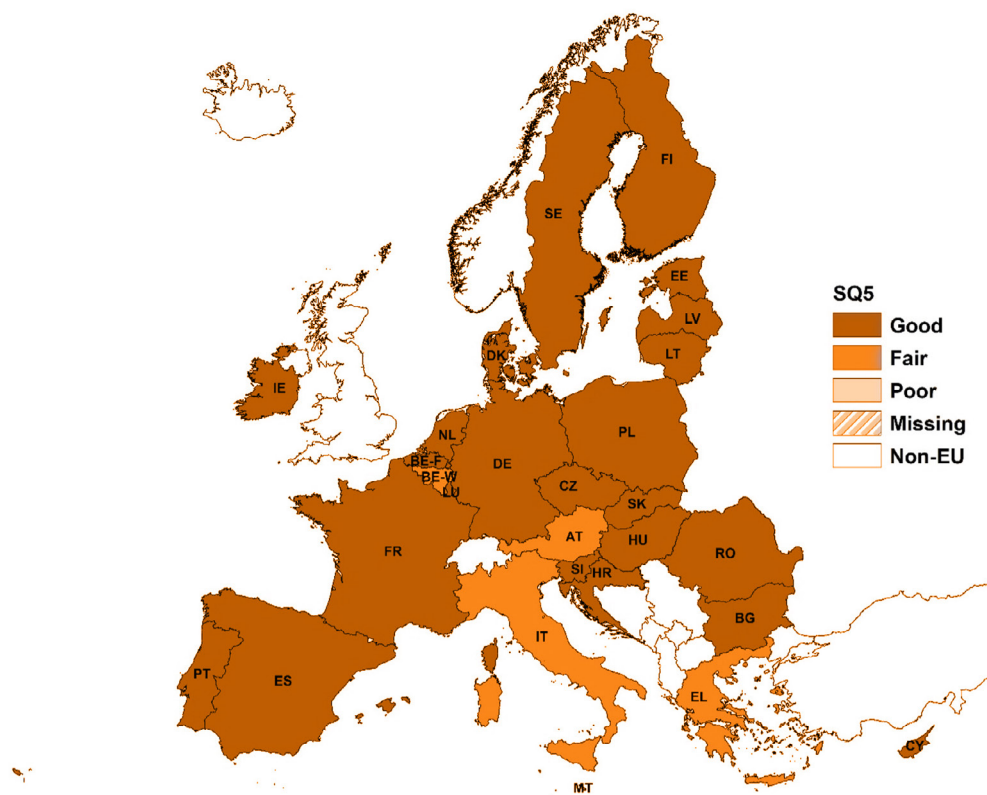
- For all CSPs, the evaluators confirmed that there is at least a fair degree of coherence between the CSP interventions and that overall there is consistency, synergy and balance between them.
- Only 18 *ex ante* evaluation reports confirmed that the interventions and their eligibility conditions are at least fairly consistent with the GAEC standards and definitions, whereas ten reports did not make reference to this aspect.
- Concerns were raised about the interaction of GAEC standards with eco-schemes and other environment and climate interventions.
- Only 16 CSPs took (partial) account of lessons learned from past programming periods in designing the interventions.
- Most of the recommendations called for clarity and coherence between objectives, interventions and needs, and highlighted inconsistencies in the link between the needs and the interventions which, as found in the previous SQ4, could be improved with more precise intervention logic.



2.2.2.2 Analysis

Map 5 shows that all *ex ante* evaluation reports confirm that interventions are assessed at least as 'Fair' in terms of the extent to which they are internally coherent and that there is consistency, synergy and balance between them.

Map 5. To what extent do the *ex ante* evaluation reports conclude that the CSP interventions, their eligibility conditions, definition and conditionality requirements are consistent and work in synergy to achieve the objectives coherently?



Source: European Evaluation Helpdesk for the CAP (2023)

For all CSPs, the evaluators confirmed that there is at least fairly satisfying coherence between the CSP interventions. Moreover, there is consistency, synergy and balance between them. Furthermore, in all except 10 CSPs where evaluators did not make any reference to this issue (AT, BE-WL, CZ, FI, HR, LU, MT, PT, SE, SI), evaluators confirmed that the interventions and their eligibility conditions were consistent with the GAEC standards and definitions for the achievement of spatial targets or specific conservation targets for agricultural physical resources. In addition, 16 evaluators (BE-FL, CZ, DK, EE, ES, HR, HU, IE, LT, LU, LV, MT, PL, RO, SI, SK) confirmed that lessons learned on coherence in designing the interventions from past programming periods were taken into account, while 12 evaluators (AT, BE-WL, BG, CY, DE, EL, FI, FR, IT, NL, PT, SE) did not make any reference to this.

In general, regarding the coherence of CSP interventions, out of all 28 *ex ante* evaluation reports where this element was fulfilled, two evaluators noted the evaluation was only partially carried out. In Czechia and Cyprus, the CSP was not fully developed at the time of the *ex ante* evaluation, which made the *ex ante* analysis more difficult, particularly in terms of assessing coherence. Such comments by the evaluators might hold true for several *ex ante* evaluations finalised ahead of the submission of the final CSP, although some evaluators might not have explicitly mentioned it. For instance, at the time of the evaluation, the French evaluators were unable to assess the CSP's internal coherence due to a

lack of information. Yet for the instruments assessed, evaluators concluded that most of them seemed coherent with the SO considered. Some suggestions for greater precision in terms of coherence were highlighted for each SO (internal coherence per SO), e.g. redistributive payments could be granted to smaller farms. In Slovenia and Slovakia, the evaluators indicated that there was coherence between all interventions except for SO8 and SO9 for Slovenia only. In the case of the Netherlands, Poland and Portugal, evaluators emphasised coherence regarding environmental and climate issues. For instance, the Polish SEA had five environmental goals that were assessed individually in relation to each of the nine SOs and AKIS (50 assessments in total). In only three assessments out of 50, it was recognised that there might be a slight weakening of environmental objectives as a result of implementing interventions under a given objective.

Concerning the consistency of an intervention's eligibility conditions with GAEC standards and definitions, 18 of the evaluators mentioned in their *ex ante* evaluations that this issue was present at least to a fair degree in the CSPs (BE-FL, BG, CY, DE, DK, EE, FI, FR, HR, IE, LU, NL, PL, PT, RO, SE, SI, SK). For example, in the Dutch CSP, the focus is on the transition to more sustainable circular agriculture, and an area approach has been taken to achieve synergies by integrating soil, water and biodiversity measures. In terms of impact, the results shown in the *ex ante* evaluation were positive. However, there were some concerns about how the GAEC standards



interacted with eco-schemes and other environment and climate interventions in three *ex ante* evaluations. Estonia had only one potential point of inconsistency and conflict between interventions and GAEC standards, while for Lithuania, several cases of internal inconsistency were identified between GAEC requirements and results, which was identified as potentially having a negative impact on the GHG balance, biodiversity and other environmental factors. However, the final corrections of the Lithuanian CSP took into account the recommendations from stakeholders and the evaluators. Luxembourg's evaluator was the only one to flag that this JC was not satisfied, specifying that there is no mention of the link between the interventions and the GAEC. On the other hand, nine evaluators did not provide any reference regarding the consistency of interventions with GAEC standards in their *ex ante* reports (AT, BE-WL, CZ, EL, ES, IT, LT LV, MT).

When it comes to assessing whether lessons learned on coherence in designing the interventions from past programming periods were taken into account, 16 evaluators mentioned that this was fulfilled to at least fairly satisfying degrees (BE-FL, CZ, DK, EE, ES, HR, HU, IE, LT, LU, LV, MT, PL, RO, SI, SK). In the case of Greece, Hungary, Latvia and Slovenia, the assessment of coherence was carried out at the level of SO. For Greece, in SO1 and SO9, the experience gained in previous periods was taken into account in the preparation of the CSP, but there are no further references to this for other SOs. While for Hungary and Latvia, lessons learned were only missing for SO2 and SO6, in addition to SO5 and SO8 for Latvia. On the other hand, the Slovenian CSP indicated when lessons learned could not be used for certain interventions or could have been used in a certain way for specific interventions. Lessons learned on coherence were not mentioned in 12 *ex ante* evaluation reports (AT, BE-WL, BG, CY, DE, EL, FI, FR, IT, NL, PT, SE).

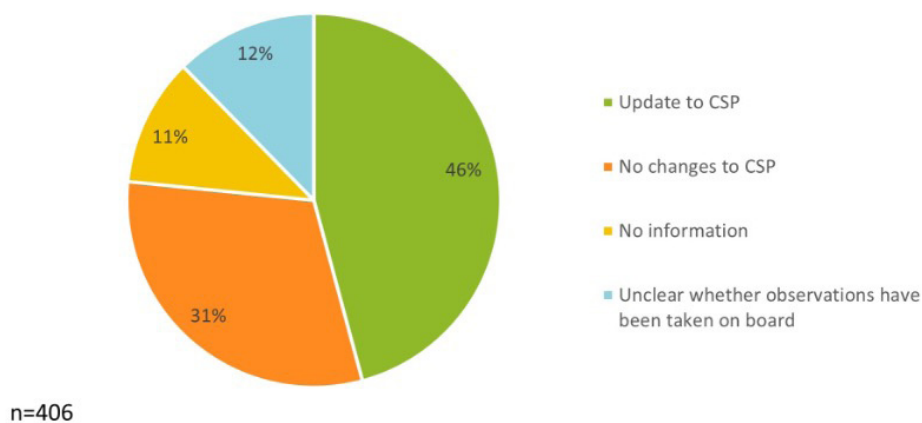
2.2.2.3 Completeness and information missing

No information was found to be missing for any CSP concerning the coherence between CSP interventions. However, when it comes to the consistency of interventions' eligibility conditions with GAEC standards and definitions, nine *ex ante* evaluation reports (AT, BE-WL, CZ, FI, HR, MT, PT, SE, SI) did not provide any information regarding this criterion. It must be noted that this element does not directly correspond to the elements outlined in Article 139 of Regulation (EU) 2021/2115. However, some of the reasons why this information was missing, highlighted by evaluators, shed light on the difficulty they faced in assessing the CSPs' internal coherence. The Finnish evaluators explained that the SEA was finalised one year prior to the CSP's completion, and therefore, the reviewed version did not include any details on GAEC. Swedish evaluators mentioned that the GAECs were missing due to ongoing negotiations regarding their design. In relation to the inclusion of lessons learned from previous programming periods in assessing coherence, 12 *ex ante* evaluation reports (AT, BE-WL, BG, CY, DE, EL, FI, FR, IT, NL, PT, SE) did not provide any information on this criterion in their CSP. No explanation was provided for this omission.

2.2.2.4 Ex ante evaluation recommendations

Annex I of the CSPs provides recommendations emanating from the *ex ante* evaluation, whereby recommendations could be classified under different categories, including intervention logic and contribution to objectives. In this regard, approximately 406 recommendations were provided in Annex I of the CSPs on the *ex ante* evaluation reports accounting for 22% of all recommendations. Out of these recommendations, 46% led to an update of the CSP. For 43% of the recommendations, while information was presented in Annex I, no changes were made to the CSP or it is unclear whether changes led to modifications of the CSP.

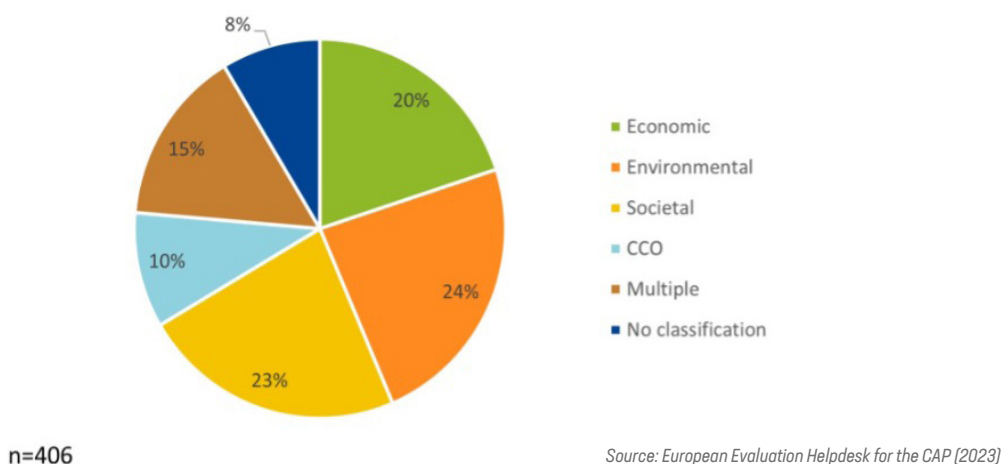
Figure 8. Induced changes based on recommendations on the intervention logic



Source: European Evaluation Helpdesk for the CAP (2023)



Figure 9. Intervention logic recommendations by types of objectives



Broken down by the types of objectives, it is apparent that most of the recommendations on the intervention logic concerned the environment (24%) followed by societal objectives (23%).

In general, most of the recommendations called for clarity and coherence between objectives, interventions and needs. Indeed, in a number of instances, the evaluators recommended the correction of inconsistencies and the clarification of the link between the needs and the interventions. For instance, for Lithuania, evaluators observed that not all the measures provided in the evaluated version of the CSP were linked to the CAP objectives.

Specific recommendations on certain interventions were also made, as in the case of eco-schemes, calling for the inclusion of specific needs in the description of eco-schemes and to clarify the extent of the contribution of eco-schemes. Recommendations were also made to highlight the synergies and complementarities between interventions, especially between EAGF and EAFRD, and to make them more explicit.

2.2.3 SQ6: To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs?

2.2.3.1 Key findings from *ex ante* reports

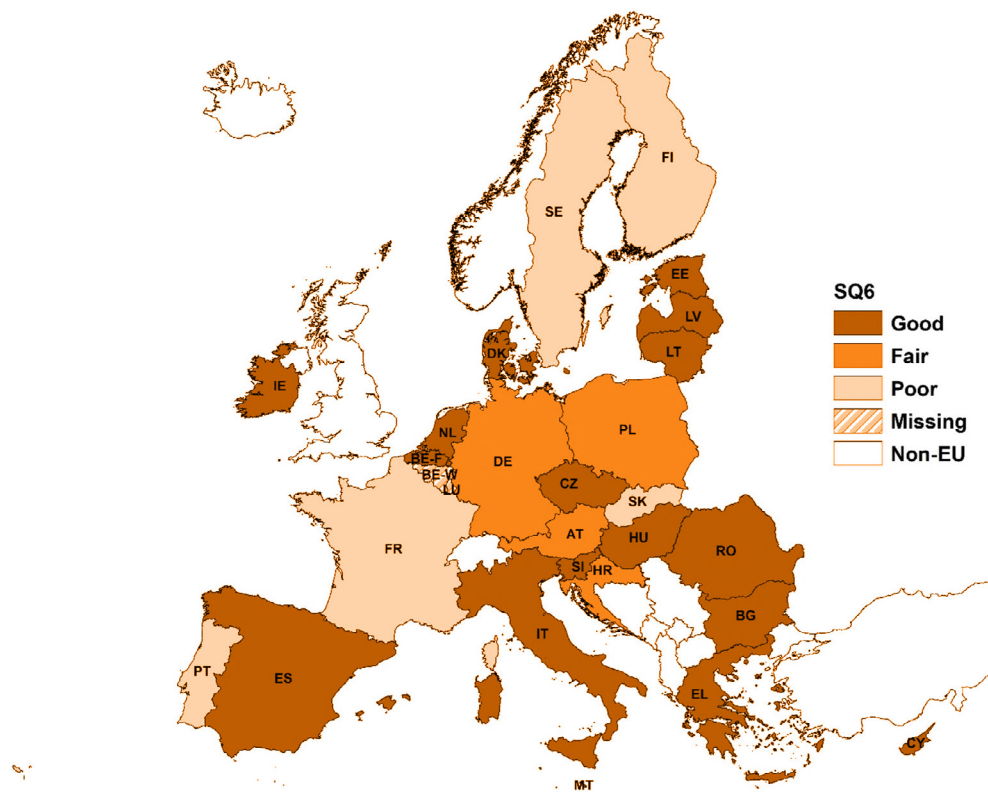
- 23 *ex ante* evaluations confirmed that the allocation of budgetary resources to each intervention was at least fairly justified by the assessment of needs, whereas 24 evaluations confirmed that the allocation of budgetary resources and the assigned unit costs to each intervention were at least fairly consistent with the results indicators and targets set in the CSP.
- However, out of 17 CSPs that chose to transfer funds between EAGF and EAFRD, only seven evaluators confirmed that the proposed transfers of allocated budget were fairly justified in the financial plan. Yet, further improvements were needed. For the remaining ten CSPs, evaluators did not provide any information in that regards.
- In general, the recommendations pointed to the need for more justifications for the allocation of the budget. While a breakdown of the budget by objective was not required (e.g. due to the multifunctional impact of interventions), it was noted that such allocation would have improved clarity.
- Limitations of the evaluations were mentioned and attributed to the use of an early draft of the CSPs for the assessment or to the assessment of budget transfers that were not directly reflected in the requirements outlined in Article 139 of Regulation (EU) 2021/2115.

2.2.3.2 Analysis

Map 6 shows that 21 *ex ante* evaluations confirmed that the allocations of budgetary resources to each intervention are assessed at least as 'Fair' in terms of the extent to which they are justified by the assessment of needs and that the assigned unit costs to each intervention were at least fairly consistent with the targets set in the CSP.



Map 6. To what extent do the *ex ante* evaluation reports conclude that the allocated budgetary resources are consistent with the CSPs' SOs and CCOs?



Source: European Evaluation Helpdesk for the CAP (2023)

A total of 23 *ex ante* evaluation reports (AT, BE-FL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IE, IT, LT, LV, MT, NL, PL, RO, SE, SI) confirmed that the allocated budgetary resources for each intervention were at least fairly well justified by the assessment of needs. For Estonia, however, while the budget planned for the interventions relating from SO4 to SO9 was considered to be sufficiently justified, and in line with the identified needs of the respective objective, the budget for the remaining interventions contributing to the other SOs was considered to be insufficiently justified, and questions were raised about the compliance with the needs and the priorities set of each SO. On the other hand, Slovakia's and Portugal's *ex ante* evaluations are the only cases where the evaluator confirmed that the allocation of budgetary resources did not reflect the prioritisation of needs and the intervention logic. Slovakia's evaluator identified discrepancies between the allocated resources and the prioritisation of the needs related to individual proposed interventions and suggested that the allocation of budgetary resources to each intervention be justified and aligned with the prioritisation of needs. The remaining three *ex ante* evaluations did not provide information regarding this element (see Analysis and synthesis of the evaluation themes, [Section 2.2.4](#)).

In total, 24 *ex ante* evaluation reports (AT, BE-FL, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SI, SK) confirmed that the allocation of budgetary resources and the assigned unit costs to each intervention are at least fairly consistent with the targets set in the CSP. Many of the evaluators have carried out this assessment by SO (AT, CY, DE, EE, FR, LV, SI) and then provided specific recommendations for improvement at SO level. For example, in the case of France, the evaluation stated that for some interventions, the link was not clear because the information provided in the intervention sheet was not sufficiently detailed to verify/understand

the calculations made in terms of budget allocation. It is important to note that for France, at the time of the evaluation, the financial architecture was not completed. It had been finalised for the EAGF but not for all EAFRD interventions. Similarly, for Spain, the evaluators raised concerns regarding the difficulty of extracting and evaluating the required information to undertake a more precise assessment. The evaluators also mentioned that the evaluation process took place in parallel with the comments from the Commission, resulting in updates to the values and indicators that were not captured in the evaluated documents. Finland is one of the few cases (along with BE-WL, FI, LU and SE) where the *ex ante* evaluation report concluded not to have enough information to assess this criterion.

Seventeen CSPs have chosen to transfer funds between EAGF and EAFRD (BE-FL, CZ, DE, DK, EL, FR, HR, HU, IT, LU, LV, MT, NL, PL, PT, RO, SK). Eight evaluators (DK, EL, HU, IT, LT, LV, NL, PT) confirmed that the proposed transfers of allocated budgetary resources between direct payments, sectoral types of interventions and types of interventions for rural development were at least fairly well stated and justified in the financial plan but further improvements were needed. For example, in the case of the Netherlands, according to the evaluator, the reduction of basic income support funds was not sufficiently addressed. In addition, there was a lack of reasoning in the fund allocation regarding interventions serving the same SO. Similarly, for Latvia, the evaluators stated that not all reallocations had been sufficiently justified, for example, for the reallocation of funds from EAGF and EAFRD concerning interventions for investments in agricultural holdings, for investments in processing and support for the setting up of young farmers. On the other hand, Poland is the only case where the evaluator confirmed that the proposed transfers of budget were not sufficiently justified. Poland's evaluator



noted that in the last version of the evaluated CSP, there was no mention of the transfers that had been made, which was highlighted in the context of the ring-fencing analyses. For the case of Lithuania, while evaluators acknowledge that funds transfers are not foreseen, they recommend considering transfers from EAGF to EAFRD, given the overall decrease of EAFRD funds compared to the previous programming period.

In addition to that, 18 evaluators (BE-FL, BG, CY, CZ, DK, EE, EL, ES, FR, HU, IE, LT, LV, MT, NL, RO, SE, SI) mentioned that lessons learned concerning the financial allocations from past programmes (size of budget and adoption rates of specific interventions) had been used to justify decisions for the budget of the CSPs. For example, for Flanders (Belgium), the evaluator added that calculations for direct payments were made based on the farmers who are currently beneficiaries. While for Spain, the *ex ante* evaluation report confirmed that lessons from the previous programming period had been considered for the budgetary allocation by type of intervention, in addition to regional interventions.

2.2.3.3 Completeness and information missing

Starting with the justification of the budgetary resources in relation to the assessment of needs, three *ex ante* evaluations (BE-WL, FR, LU) did not provide information related to this element. Regarding the consistency of the allocation of budgetary resources and the assigned unit costs to each intervention, four *ex ante* evaluations (BE-WL, FI, LU, SE) did not report on this element. In order to better understand the reasons behind this missing information, the EH individually contacted the evaluators of the *ex ante* reports mentioned above. In Wallonia (Belgium), ahead of the *ex ante* evaluation, the MA authority commissioned the University of Liege to prepare a separate study to assess various budget scenarios and indicate on which scenario the final CSP budget was based. This study also reflected the consistency between the unit cost and the targets. Therefore, Walloon evaluators considered that this assessment was out of the scope of the *ex ante* evaluation.

In France, the evaluators mentioned that the financial architecture was not fully complete at the time of writing the second phase of the evaluation report. For example, the financial table at that time did not include data for several EAFRD interventions, which made it difficult to make an informed judgement. In addition, several intervention sheets were not received at the time of writing, which resulted in a lack of information on which to base an informed judgement.

Regarding lessons learned from past programming periods, in the case of Finland, the evaluator mentions that the CSP did not include a clear argumentation for the allocation of budgetary resources and assigned unit costs and used past experiences in a too simplistic way.

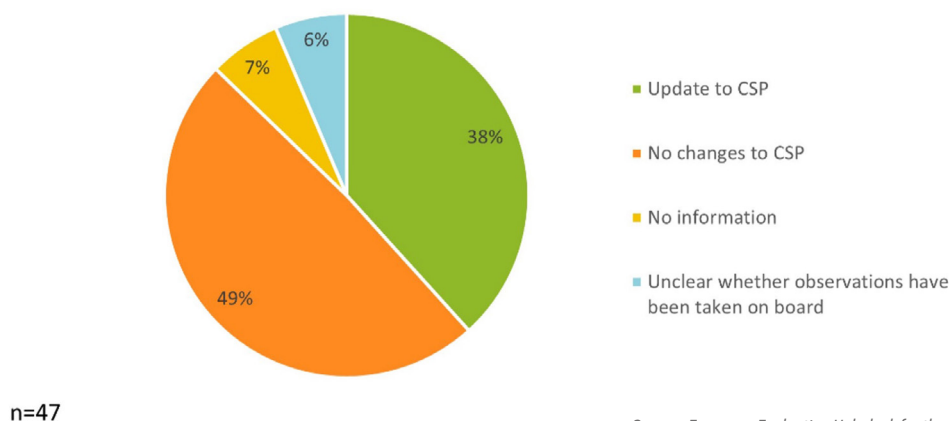
In Luxembourg, the *ex ante* evaluation of the budget was based on partial working documents. The evaluators mentioned that it was difficult to provide a comprehensive assessment of the distribution of the budget by SO on the basis of the documents made available to the evaluators. Evaluators, however, displayed the graph of the distribution of the budget according to the SOs and interventions. This is confirmed by the findings from the focus group, where the Luxembourgish evaluators mentioned that the *ex ante* evaluation was conducted on the first draft of the CSP, and the contract did not cover subsequent revisions. In addition, there was a year's time difference between the first draft of the CSP and the final version submitted to the Commission. Moreover, according to the focus group, the key challenge was around the changes to the CAP regulations and the draft CSPs, making it difficult for evaluators to adapt to the CSP's changes.

Regarding the transfers of allocated budgetary resources between direct payments, sectoral types of interventions and types of interventions for rural development, nine CSPs utilised these options (BE-FL, CZ, DE, FR, HR, LU, MT, RO, SK), but their respective *ex ante* evaluations did not contain any information regarding this matter. In addition, 10 *ex ante* evaluations (see [Annex 2](#)) did not mention lessons learned concerning the financial allocations from past programmes (size of budget and adoption rates of specific interventions) and whether these were used to justify decisions for the budget of the CSPs.

2.2.3.4 Ex ante evaluation recommendations

Recommendations were also made as part of Annex I of the CSP in terms of the allocation of budgetary resources. Towards this end, a total of 47 recommendations were made, accounting for 3% of all the recommendations presented in Annex I. Of these recommendations, information on how these were subsequently addressed, was not available for about 7% of the recommendations. For the rest, while information was available, no effective changes were made to the CSPs. On the other hand, for 38% of the recommendations, changes were made to the CSP ([Figure 10](#)).

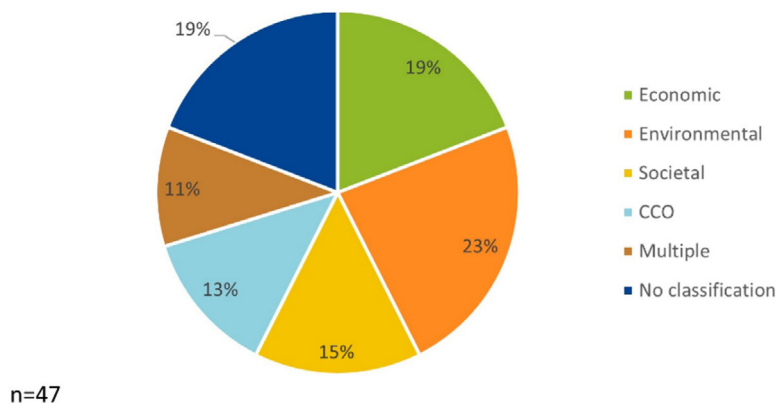
Figure 10. Induced changes of recommendations on the allocation of budgetary resources



Source: European Evaluation Helpdesk for the CAP (2023)



Figure 11. Allocation of budgetary resources recommendations by types of objectives



Source: European Evaluation Helpdesk for the CAP (2023)

A further breakdown of the recommendations on budgetary resources indicates that, in general, there was a fairly even distribution across most objectives, with slightly more recommendations relating to environmental objectives (Figure 11).

In general, the recommendations centred around the provision of justifications for the allocation of the budget. In some instances, it

was noted that the budget should also be allocated by SO to allow for clarity (AT). While this was noted, it was also indicated that “the Basic Act did not require budgets per SO to be established in the Strategic Plan”. This is because many interventions are assigned to several SOs due to their multifunctional impact.

2.2.4 SQ7: To what extent are the CSPs coherent with other policies, including but not limited to EU policies, national and regional policies?

2.2.4.1 Key findings from *ex ante* reports

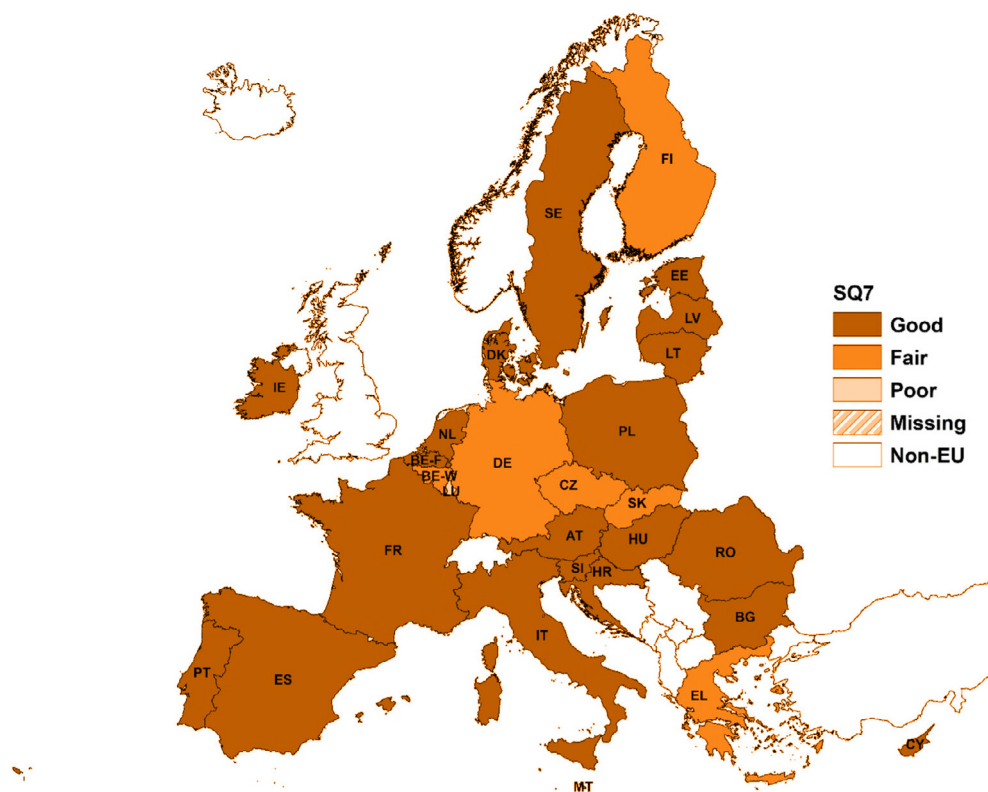
- 22 *ex ante* evaluation reports confirmed that their national CSPs complemented the policies listed in Annex XIII of Regulation (EU) 2021/2115.
- 26 *ex ante* evaluations confirmed that the CSPs are at least fairly externally coherent with other policies. However, the degree of detail the CSPs or evaluators provide varies greatly among Member States.
- CSPs often provide overly general descriptions or demonstrate only partial coherence, especially for the climate and environmental, LEADER and societal SOs. Evaluators often recommended the need to clarify and to systematically address external coherence by highlighting how environmental interventions contribute to EU environmental and climate related objectives.
- Most of the CSPs do not make reference to the use of lessons learned from past experience, which might suggest a shortcoming.
- Several recommendations were made, especially linked to environmental objectives, but most of them did not lead to an update of the CSP. A number of recommendations noted the importance of coherence with other funding instruments and awareness of potential overlaps.

2.2.4.2 Analysis

Map 7 shows that 27 *ex ante* evaluations confirm that the CSPs are assessed at least as ‘Fair’ in terms of the extent to which they are coherent with other policies. Therefore, the CSPs are assessed at least as ‘Fair’ in terms of the extent to which they are complementary to the policies expressed through the legislative acts of Annex XIII of Regulation (EU) 2021/2115. Furthermore, some identified needs are assessed at least as ‘Fair’ in terms of the extent to which they are addressed by policies outside the CSPs.



Map 7. To what extent do the *ex ante* evaluation reports conclude that the CSPs are coherent with other policies, including but not limited to EU policies, national and regional policies?



Source: European Evaluation Helpdesk for the CAP (2023)

The evaluators of 22 *ex ante* evaluations (AT, BE-FL, BG, CY, DK, EE, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, SK) confirmed that their national CSPs complemented the policies expressed through the legislative acts listed in Annex XIII of Regulation (EU) 2021/2115. However, evaluators of some *ex ante* reports suggested that there should be a better alignment of interventions under SO4, SO5 and SO6 with environmental and climate policies. For example, in the case of Flanders (Belgium), Lithuania, Latvia, Ireland, Romania, Slovenia and Slovakia, the evaluators verified that certain interventions outlined in their CSPs are directly linked to the policies mentioned in Annex XIII of Regulation (EU) 2021/2115. These interventions focus on areas like water management, Natura 2000 areas and climate change mitigation measures. In some cases, concerns were raised about the completeness of coverage and potential inconsistencies with national strategic documents. In the *ex ante* report of Bulgaria, Cyprus, Croatia and Portugal, evaluators acknowledged the establishment of links between some interventions and policies listed in Annex XIII of Regulation (EU) 2021/2115. However, the lack of detail in the strategies made it difficult to assess the presence of synergies or trade-offs. For France and Italy, evaluators recommended a more systematic approach to climate actions outlined in Annex XIII of Regulation (EU) 2021/2115. In the case of Greece, the evaluators underlined a lack of coherence and highlighted that significant improvements were needed to ensure the contribution to and consistency between the CSP and the corresponding national targets derived from or set out in the legislative acts listed in Annex XIII of Regulation (EU) 2021/2115. Furthermore, five evaluators indicate that there is no information in the CSP concerning this JC (BE-WL, CZ, DE, FI, LU).

In all the *ex ante* evaluation reports, except for Luxembourg and Slovakia, evaluators confirmed that the CSPs are at least fairly externally coherent with other policies. However, the degree of detail the CSPs or evaluators provide varies greatly among Member States. Additionally, in several instances, such as in Greece, Cyprus, the Netherlands, Portugal and Luxembourg, evaluators noted that assessment of external coherence of the CSP was not always feasible due to the draft nature of the CSPs at the time when the evaluation took place.

Luxembourg and Slovakia were the only two *ex ante* reports where evaluators concluded that there was a lack of coherence of the CSP with the Green Deal. For Luxembourg, evaluators pointed out that the number of farmers eligible for climate-related subsidies was too limited. For the other 26 CSPs (AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI), evaluators concluded that the interventions in the CSPs were at least fairly coherent with other relevant policies. In Cyprus, Czechia, Malta, the Netherlands, France and Poland, evaluators recommended making more explicit links between specific interventions and their potential to raise overall climate and environmental ambition.

A total of 26 evaluators from the same CSPs mentioned before confirmed that the potential negative trade-offs with other relevant policies have been at least fairly well identified and considered in the CSPs (see [Annex 2](#)). However, the CSPs do not always implement mitigation measures to offset potential negative trade-offs. As an example, in Hungary, evaluators noted that coupled income support might harm the carbon footprint of the agricultural sector and that mitigation options should be discussed. The Austrian evaluators



pointed out that potential trade-offs between intervention under SO1 and environmental objectives might exist. Furthermore, evaluators from Luxembourg and Slovakia indicated that their respective CSPs did not satisfy the above element. In the case of Luxembourg, the evaluator mentioned that when it comes to external coherence, the CSP does not yet specify the complementarities and demarcation lines with other EU funds and that coordination mechanisms are not yet clearly defined.

A similar conclusion can be drawn regarding potential overlaps or funding gaps between relevant policy instruments. Evaluators for the same previously mentioned 26 *ex ante* reports (AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI) emphasised that while external coherence is formally met, the CSPs often provide overly general descriptions (e.g. HR, PL) or demonstrate only partial coherence, particularly in relation to SO4, SO5, SO6, SO8 and SO9 (DE, EL, LT, LV). In Denmark, Spain and Romania, evaluators noted that their CSPs outlined measures to avoid double funding. In Sweden, evaluators concluded that integrating interventions funded by the EAGF and EAFRD into a single CSP had led to better coordination within both funds and with other EU funds, including Horizon Europe and LIFE. Furthermore, Luxembourg and Slovakia do not fulfil this JC. For example, Slovakia's evaluator indicated that the current situation of the operational programme 'Europe closer to citizens' (which develops the administrative capacities of local and regional authorities) is relatively unclear and ineffective since regions have several bodies ensuring administrative capacities (e.g. counselling centres). However, these organizations are not collectively coordinated, while political changes regularly alter their structure and senior staff. From the point of view of building AKIS, but also from the paying agency perspective, the evaluator recommended analysing and coordinating the relevant existing regional interventions to seek synergies and prevent double funding or overlapping competencies.

Finally, in terms of references to previous experiences used to justify choices and reinforce external coherence, evaluators of 18 CSPs (AT, BE-FL, BE-WL, BG, CY, DE, EL, FI, FR, HR, IE, IT, LU, LV, MT, NL, SE, SK) did not make such references. In the remaining 10 CSPs (CZ, ES, HU, LT, PL, PT, DK, EE, RO, SI), evaluators confirmed that the CSPs referred to previous experiences to justify their choices and ensure external coherence. However, in some CSPs, such as Czechia, Estonia and Portugal, these previous experiences were not described in detail. Evaluators recommended providing a detailed account of lessons learned from previous periods, ensuring complementarity, synergies, coordination and differentiation from other EU funded interventions, as well as national experiences.

In Denmark, evaluators referred to previous experiences, including various studies, but noted that lessons learned had been extensively incorporated in the SEA.

2.2.4.3 Completeness and information missing

Evaluators from all *ex ante* evaluation reports have conducted assessments on the external coherence of the CSPs. However, the evaluation process remained significantly incomplete for the following five CSPs: Wallonia (Belgium), Czechia, Finland, Luxembourg and Germany. According to some evaluators' reports, one of the reasons for this incompleteness is that the CSPs were still in the early drafting stages during the evaluation. In Czechia, for example, the evaluator noted that due to missing justifications for the intervention logic during the *ex ante* evaluation, it was not possible to thoroughly assess the details of the intervention logic. This assessment could shed light on positive external coherence and complementarities of the interventions with other policies. In Wallonia (Belgium), the evaluator stated that the CSP's interventions did not contribute to Annex XIII of Regulation (EU) 2021/2115 policies (as asked in the SQ), but did so for interventions contributing to the Green Deal, Farm to Fork Strategy and Biodiversity Strategy.

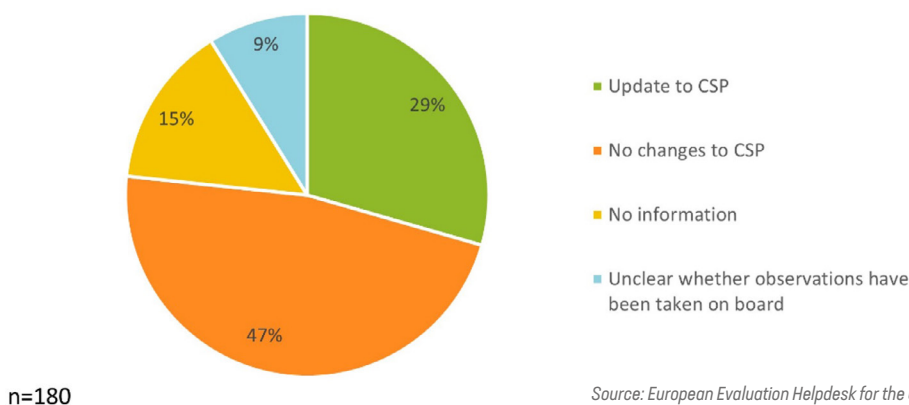
An additional keyword check was performed to assess the extent to which Annex XIII of Regulation (EU) 2021/2115 policies were considered in the design of the GAEC standards (see Methodological approach, [Section 1.2.3](#)). This was done to close the gap of missing information in Wallonia (Belgium), Czechia, Finland, Germany and Luxembourg. However, no information was found in this way.

Nevertheless, the most crucial missing information pertains to lessons learned from previous programming periods regarding the external coherence of the CSPs. However, this element is not reflected in Article 139 of Regulation (EU) 2021/2115 per se. The *ex ante* evaluation reports or SEA reports of 18 CSPs (AT, BE-FL, BE-WL, BG, CY, DE, EL, FI, FR, HR, IE, IT, LU, LV, MT, NL, SE, SK) did not provide any references to this aspect. These evaluators have provided no further explanations explaining the reason behind this.

2.2.4.4 Ex ante evaluation recommendations

Annex I of the CSPs, derived from the *ex ante* evaluations, also presented recommendations on internal and external coherence. A total of 180 recommendations were made on this topic, representing 10% of the total recommendations. Unlike most of the recommendations under other SQs, the majority in this case (47%) did not lead to changes in the CSPs ([Figure 12](#)).

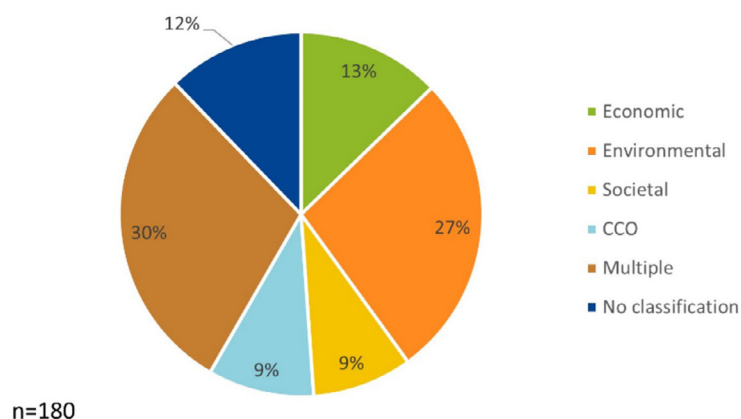
Figure 12. Induced changes of recommendations on external and internal coherence



Source: European Evaluation Helpdesk for the CAP (2023)



Figure 13. External and internal coherence recommendations by types of objectives



Source: European Evaluation Helpdesk for the CAP (2023)

As can be seen from [Figure 13](#), most of the recommendations derived from the *ex ante* evaluations focused on the environmental objective, followed by multiple objectives.

In connection to external coherence specifically, some of the recommendations focused on the importance of highlighting how interventions contribute to the Climate Change Adaptation Strategy, the Integrated National and Energy Plan and the Low Carbon Development Strategy, as in the case of Croatia. In Hungary, evaluators refer to the importance of external coherence and synergies between the CCOs and Horizon Europe. In addition, synergies with the Green Deal, Farm to Fork Strategy and Biodiversity Strategy were also noted, leading to updates in the CSPs.

A number of recommendations noted the importance of coherence with other funding instruments and awareness of potential overlaps. For instance, in Romania and Latvia, evaluators referred to complementarity with other funds.

At the level of internal coherence, the recommendations varied, albeit focusing on specific interventions to ensure no overlap between interventions. For instance, a recommendation for Ireland called for clarifying statements on the boundaries between key features of the green architecture with respect to definitions, conditionality and the avoidance of duplication.

2.3 Assessment of the expected outputs, results and impacts of CSPs

2.3.1 SQ8: To what extent will the expected outputs contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD?

2.3.1.1 Key findings from *ex ante* reports

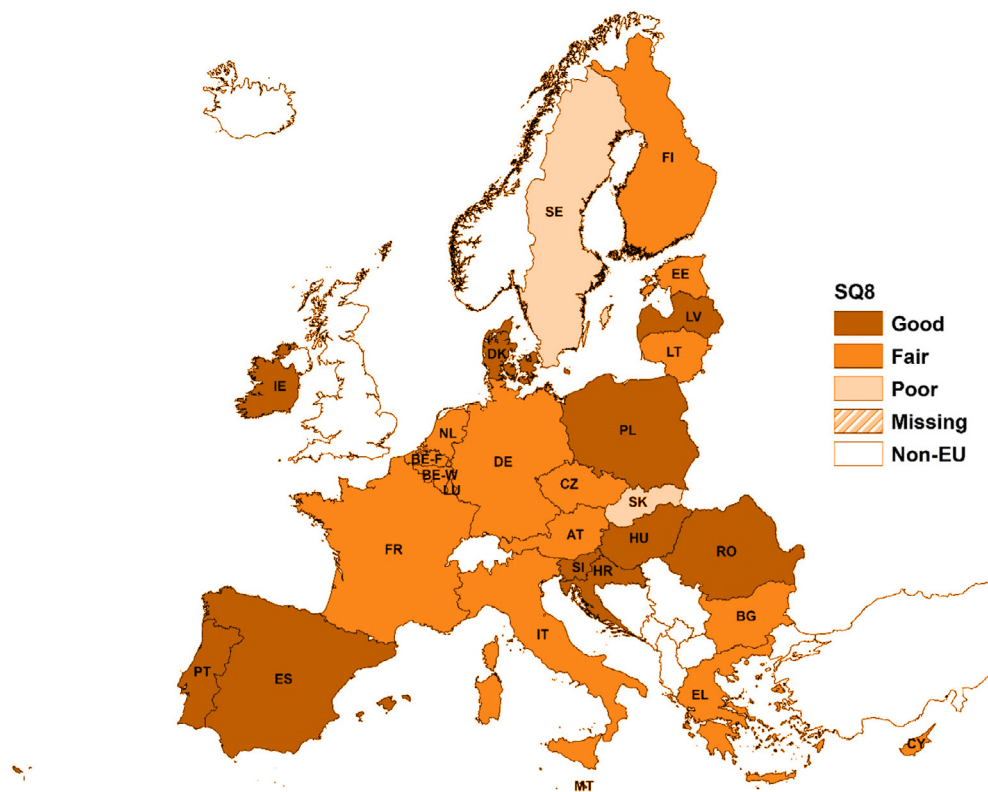
- 26 *ex ante* evaluations indicated that interventions have a 'Fair' or better linkage to result indicators, with target values for results being traceable and justified in terms of inputs, outputs and their values. However, some CSPs showed unclear links or missing milestones and a few required more detailed methodological explanations.
- Likewise, 26 evaluations concluded that the target values were realistic and appropriate, justified and comprehensive, and considered the financial planning of the CSP.
- However, only 12 *ex ante* evaluation reports confirmed that the annual milestones were at least fairly suitable for each relevant result indicator.
- Besides, only 13 *ex ante* evaluation reports concluded that lessons learned from past experiences underpinned the design of interventions, target values and milestones, while references to past experiences were often undocumented.
- Recommendations were made in relation to missing or inconsistent information on the timing of the milestones and on assumptions in the setting of targets.
- Only nine *ex ante* evaluation reports assessed the CSPs' potential contribution to impact indicators, with varying approaches. Most reports lacked a quantitative assessment due to unclear linkages of impact indicators with SOs or interventions. Recommendations were made to establish a clear connection between result and impact indicators for evaluating the CSPs' ambitions and quantitative contribution to EU 2030 objectives.



2.3.1.2 Analysis

Map 8 shows that 26 *ex ante* evaluations confirmed that each intervention is assessed at least as 'Fair' in terms of the extent to which they are linked to one or more result indicators and that assumptions to estimate the output values and result targets are at least fairly outlined and validated.

Map 8. To what extent do the *ex ante* evaluation reports conclude that the expected outputs will contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD?



Source: European Evaluation Helpdesk for the CAP (2023)

As a general conclusion, expected outputs from interventions contribute to results that allow for realistic quantified result targets. *Ex ante* evaluations for all CSPs examined whether the quantified target values for results were appropriate and realistic through a series of evaluation questions. The interventions were generally linked to at least one or more result indicators in all CSPs. Considering the number of intervention-result indicator pairs and consequent links, sometimes the interaction was unclear, incomplete, or incorrectly indicated. Such cases were, for example, flagged in the CSPs of Flanders (Belgium) and Wallonia (Belgium), Bulgaria, Lithuania and Sweden. However, the EH observed significant missing information regarding the assessment of milestones where 12 *ex ante* evaluations did not report any assessment made in that regard.

The target values for result indicators are largely traceable and justified in terms of inputs and quantification since the evaluators of 26 *ex ante* reports mention that this JC was satisfied (all CSPs except SE and SK). The methodological basis for calculating the target values of the result indicators was either provided or implied, and its quantified outcome was cited. For very few interventions in less than seven CSPs, a more detailed methodological description was needed to better understand how the respective planned values had been derived. *Ex ante* evaluations observed a lack of justification or inconsistencies in the justifications for some interventions in only five CSPs. The same 26 *ex ante* reports confirmed that the indicated

targets were realistic and reasonable and took into account the financial planning, as indicated in the Danish, Estonian and Greek *ex ante* evaluations. The targets also considered past experience and relevant historical data, as shown in the Croatian CSP or more recent monitoring data in the Greek CSP.

One way to understand and evaluate whether target values are appropriate and realistic is to analyse the key factors related to their definition. The main key factors of the target values include the link to identified needs and the planned intervention budgets to support the target. Unfortunately, this information was not always available on time and sometimes not until the CSP was in its final draft form. In addition to these factors, which are related to the needs and the allocated budget, the *ex ante* evaluations showed that many CSPs extended the list of factors to include an assessment of previous experience, absorption capacity, the experience of the beneficiaries, the procedures for setting targets, expertise and ability of beneficiaries to apply and implement planned actions, environmental and climate issues, design of related interventions, specific information on natural resources, or the existence of reliable data sources, especially at regional or local levels. *Ex ante* evaluations concluded that, in most CSPs, the planned result indicator targets were considered adequate and appropriate after accounting for a combination of the above key factors. Of course, a few inconsistencies were identified, mainly related to a possible



under- or overestimation of planned target values. For example, according to evaluators, in Flanders (Belgium), target values for LEADER were underestimated, while in Italy, the output values for infrastructure investment operations were underestimated. Other *ex ante* evaluations pointed to incorrect or incomplete associations between interventions and indicators, mainly in SO1 and SO3.

The evaluators of 12 *ex ante* evaluation reports confirmed that the annual milestones were at least fairly suitable for each of the relevant results indicators (DK, ES, HR, HU, IE, IT, LV, MT, PL, PT, RO, SI). In such instances, evaluators confirmed that the milestones were based on the designed interventions and the differences in milestones were clearly explained, as underlined in the Spanish, Hungarian and Latvian *ex ante* evaluation reports. This was especially the case for differences/increases in annual milestones in comparison to the previous programming periods, which were tracked and clearly explained in these CSPs. This yields realistic annual milestones in the majority of CSPs, as shown in the Spanish, Croatian and Irish *ex ante* evaluation reports. In Spain, the CSP explained the differences in milestones, especially those that have increased their values compared to previous periods. The latter indicated that the reliability of milestones also depended on other features of the CSP, such as the stable level of available funding and participation in the interventions. These 12 evaluators confirmed as well that the set milestones were suitable for annual reporting and consistent with each other and the final objectives. For example, in the Romanian CSP, the *ex ante* evaluator stated that the milestones set in the target planning were appropriate for the annual reporting of the performance framework, covered the entire period 2023-2027, and were consistent with each other in relation to the final objectives. Nevertheless, for the 16 remaining *ex ante* evaluations (see detailed breakdown in [Annex 2](#)), the *ex ante* evaluators did not assess the suitability of milestones (12), or they concluded that the justifications provided in the CSPs were insufficient (4).

Only nine *ex ante* evaluations confirmed that CSPs identify specific risks which may influence the milestones' attainment or internal and external factors that may determine the pace of fund absorption (DK, ES, HR, HU, LV, PL, PT, RO, SI). For example, in Spain, the experience of the previous programming period and the differences between regions were considered when planning the milestones and assigning the indicators. The same CSP aimed to achieve planned milestones and targets by introducing financial solidarity among the regions. In Hungary, the envisaged difficulties and the absorption risk are identified as being very low due to experience in implementing Pillar 1 payments and schemes and Pillar 2 measures. However, in Hungary, one source of uncertainty remains with the eco-schemes, specifically their adoption rates and penetration among farmers. The Slovenian *ex ante* evaluation assessed external factors affecting the absorption rate of funds, including the socio-economic context of potential beneficiaries, the legal framework, and natural and climate conditions, as well as internal factors such as the quality of the information provided during the call for tenders, any bottlenecks experienced in the management of projects, and the ability of beneficiaries to register and carry out planned interventions.

One potential threat to achieving milestones and result targets is the administrative and financial burden of continuing financial commitments from the 2014-2020 programming period. Only seven *ex ante* evaluations examined whether the CSPs had considered this when setting milestones (DK, HU, IE, LT, PL, PT, RO). The Irish CSP contained a specific table which introduced the background

and overview of each of the interventions proposed in the draft CSP, comparing the CSP interventions to those under the 2014-2020 programming period. For some interventions, the table indicated a different level of ambition compared to the previous programme (e.g. Agri-Environment Climate Measures (AECMs)); for others, it suggests a continuation (e.g. European Innovation Partnership (EIP)). However, there is no specific reference to the setting of milestones.

Thirteen CSPs (AT, BE-FL, BE-WL, BG, CY, DE, EL, FR, HR, IT, LU, NL, SE) do not cite, document or reference lessons learned from applying the same or similar designs in the past (interventions, target values, milestones), whereas, in Czechia and Slovakia, the *ex ante* evaluation report attested that the lessons learned are not reflected in the design of interventions, targets and milestones. Moreover, even when the CSPs confirmed that lessons learned underpinned the design of interventions, targets and milestones (DK, EE, ES, FI, HU, IE, LT, LV, MT, PL, PT, RO, SI), references to past experience were often undocumented. Thus, lessons learned from analysis or evaluation were not reflected in estimating the result targets, the distribution of the milestones set or the potential absorption of funds by potential beneficiaries. Lessons learned from the previous programming period were considered when planning the key outputs/results indicators, as in Estonia and Spain, or the milestones/targets, as in Spain, Poland, Portugal, Romania and Slovenia.

Finally, only nine *ex ante* evaluation reports indicated the potential contribution (or absence) of the CSP towards the impact indicators (CY, DK, HR, HU, LT, LV, PT, RO, SK). Some *ex ante* reports conducted an expert assessment based on impact indicators (HU, LT, RO), others based on context indicators (CY), or based on budget allocation (HR). However, in most of the cases, *ex ante* evaluators mentioned that a quantitative assessment was not conducted for several reasons. In France, the value of output indicators and most of the results indicators were not available at the time when the *ex ante* report was prepared. In Slovenia, Belgium (Wallonia), Spain and Ireland, *ex ante* evaluators concluded that the link between results indicators or SOs was not clearly stated, rendering the endeavour of an impact assessment difficult. Similarly, the Lithuanian and Romanian *ex ante* evaluators recommended linking result indicators with impact indicators in order to assess the ambitions of the CSP and the quantitative contribution of the CSP to the EU 2030 objectives.

2.3.1.3 Completeness and information missing

As the *ex ante* evaluations report, all but one CSP set, with varying degrees of disagreement from *ex ante* evaluators, realistic target values for each relevant result indicator (see [Annex 2](#)). In particular, the Swedish *ex ante* evaluation did not confirm that each intervention was clearly linked to one or more result indicators, as there was no connection between 19 of the result indicators and any measure in the intervention logic. Moreover, result indicators were identified for all interventions, except for the apiculture sector interventions, which were not legally binding.

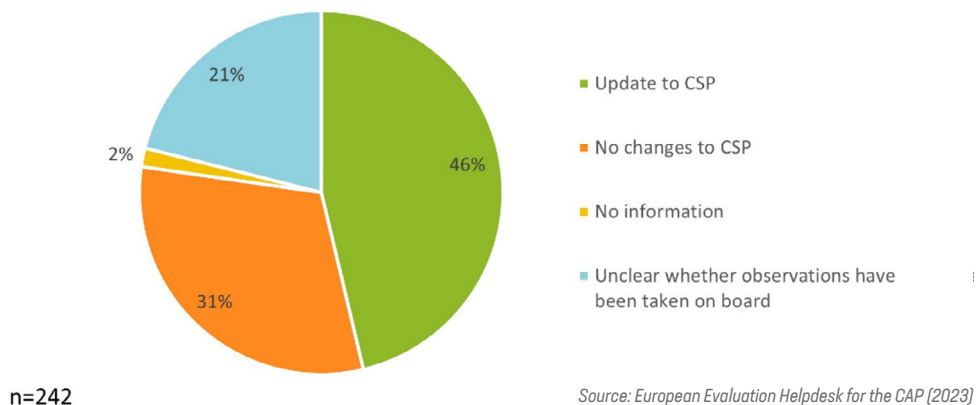
The only case where missing information becomes rather extensive concerns the appropriateness and realistic setting of the target values for milestones. Twelve *ex ante* reports did not contain any information on this, although they provided information on the corresponding target values for results indicators (see detail breakdown [Annex 2](#)). Some evaluators argued that such assessments were not feasible at the time, given that the draft CSPs did not set values for milestones (e.g. BG and FR). Such comments, even if not directly found in the *ex ante* reports, might hold true for others.



2.3.1.4 Ex ante evaluation recommendations

A total of 242 recommendations were presented as part of Annex I of the CSPs on the *ex ante* evaluations in relation to outputs, results and the establishment of milestones and targets. Out of these recommendations, 46% led to an update of the CSP, as seen in [Figure 14](#). For 31% of the recommendations, information was provided although no changes were undertaken to the CSP.

Figure 14. Induced changes of recommendations on output and results targets and milestones



A further breakdown of the recommendations in Annex I by the type of objective can be observed in [Figure 15](#) whereby most of the recommendations focused on environmental issues. This was followed by 17% of the recommendations on economic and societal objectives, respectively.

The majority of the recommendations addressed by the CSPs were associated with missing or inconsistent information.

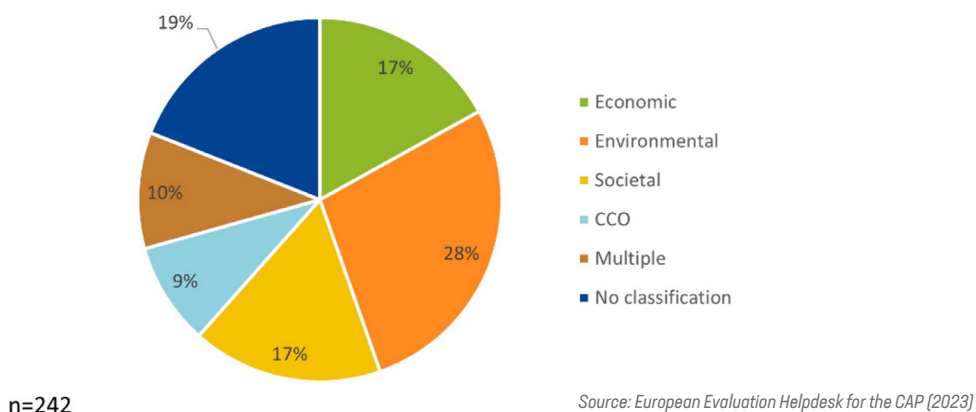
In other instances, the recommendations called for:

- > More information on the timing of the milestones (AT);
- > The provision of information on assumptions in the setting of targets (ES);

- > Re-visiting the intervention logic to ensure complementarity between the strategy, interventions and setting of target values (ES);
- > Recommendations not addressed by the CSP concerned improvements to assess the immediate impact of interventions (AT, IE, LV).

An interesting recommendation made in the *ex ante* evaluation for the Irish CSP is the need to include statements regarding planned flexibility and changes which can happen during implementation in light of the requirements to achieve stringent sectoral climate targets. This was addressed in Section 7.2 of the CSP on monitoring and reporting systems.

Figure 15. Output and results targets recommendations by types of objectives



2.4 Assessment of the measures planned to reduce administrative burden

2.4.1 SQ9: To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries?

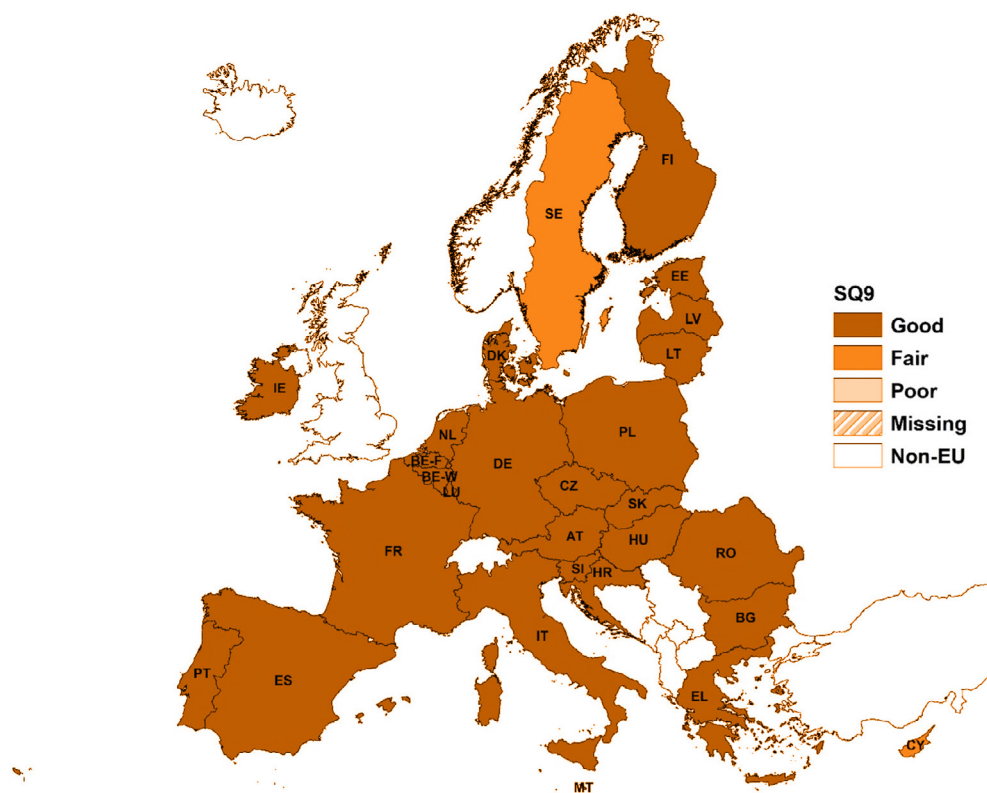
2.4.1.1 Key findings from *ex ante* reports

- > All 28 *ex ante* evaluation reports confirmed that the design of the policy and interventions, including throughout the different steps of the policy cycle, support, at least fairly well, simplification within the CSPs, although further improvements were needed.
- > Most CSPs had an appropriate number of interventions without being extremely fragmented or consolidated to avoid unnecessary complexities in implementation and monitoring. Yet, concerns were raised about the number of interventions related to the new Green Architecture, which could make implementation more difficult.
- > Overall, the evaluators reported that the CSPs were making efforts to simplify procedures for applicants and paying agencies, but further development was needed to ensure adequate reductions in administrative burden.
- > Concerns were raised about the extent of simplification achieved since, in some cases, this was difficult to ascertain as details regarding implementation were yet to be defined in guidelines and instructions.
- > Common recommendations were to further simplify the policy in the national CSP and implementation documents, promote the use of digital application systems and enhance interoperability between public information systems.

2.4.1.2 Analysis

Map 9 shows that the design of the policy and interventions of all *ex ante* evaluations, including throughout the different steps of the policy cycle, are assessed at least as 'Fair' in terms of the extent to which they are supporting the simplification of the CSPs.

Map 9. To what extent do the *ex ante* evaluation reports conclude that the CSP has foreseen measures to reduce the administrative burden on farmers and other beneficiaries?



Source: European Evaluation Helpdesk for the CAP (2023)



In all 28 *ex ante* evaluation reports, evaluators confirmed that the design of the policy and interventions, including throughout the different steps of the policy cycle, support, at least fairly well, simplification within the CSPs. It is important to note that this JC is the only JC under this SQ reflecting elements outlined in Article 139 of Regulation (EU) 2021/2115. While the CSPs have taken steps to reduce administrative burdens for farmers and beneficiaries, there is still room for improvement. The evaluators also noted that the authorities had put considerable effort into the digitalisation and automation of the application and handling process, which was intended to further contribute to the simplification of the policy.

In terms of the number of interventions, evaluators indicated that most CSPs have an adequate number of interventions without being extremely fragmented or consolidated to avoid unnecessary complexities in implementation and monitoring. The interventions were well described, consistent and non-contradictory, and were analysed at national and regional levels to ensure consistency. However, for some CSPs, some evaluators highlighted the number of interventions related to the new Green Architecture. For instance, evaluators commented that the significant number of interventions was likely to make implementation more difficult in Wallonia (Belgium). In Germany, evaluators stated that the design of interventions needed to ensure good coordination between the various building blocks (e.g., conditionality, eco schemes etc...) to ensure farmers could select the right combinations of interventions without errors.

Overall, the *ex ante* evaluators reported that the CSPs were making efforts to simplify procedures for applicants and paying agencies, but further development was needed to ensure adequate reductions in administrative burden. Additionally, the evaluators emphasised that clear and consistent information, application methods and coordination between different interventions were essential for reducing complexities in implementation and monitoring.

All the evaluators (except SE) confirmed that the CSPs were promoting the simplification and reduction of administrative burden fairly well through digital application systems. The majority of CSPs mentioned the use of digital tools and applications to simplify and reduce administrative burdens at different stages of the applicant-agency interface. For example, in Flanders (Belgium), evaluators noted that e-counters are expanding. Denmark is also using electronic application templates and satellite-based control systems. However, evaluators recommended further work on developing the data management system and enhancing Information Technology (IT) support. In Greece, evaluators stated that the paying agency was developing a range of contemporary means, such as geospatial and animal-based application systems, to improve efficiency and reduce the administrative burden. Evaluators in Cyprus acknowledged that although digitalisation can simplify processes, barriers may exist in other sections of public services that create bottlenecks in issues related to funding requirements. Most of the recommendations highlighted that further improvement might be needed to ensure that the digital application systems are user-friendly and accessible to all beneficiaries, including the smallest farmers.

For Member States with prior experience in the digitalisation of their system, such as Germany, the Netherlands or Ireland, a similar approach was taken to allow beneficiaries to amend or correct their application digitally after submission, without facing financial penalties.

A total of 24 *ex ante* reports confirmed at least to a fair extent the simplification of IACS application and control procedures (AT, BE-FL,

BE-WL, BG, CZ, DE, DK, EL, ES, FI, FR, HR, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI, SK). However, they recommended the need for more details in the CSPs and effective communication with farmers to ensure compliance. Most CSPs recognised the potential benefits of remote sensing and the AMS for controlling eligibility conditions and conditionality. Some Member States had already implemented online systems for the submission of area aid applications, while others had developed tools such as AMS and automatic analysis algorithms to improve control management. For example, in Italy, the CSP provides simplification tools and procedures, including the use of AMS, geotagged photos, and automation tools. It also implements the full digitisation of application and administrative check procedures, along with enhancing interoperability between public information systems. According to the evaluators, many CSPs described the use of Land Parcel Identification System (LPIS) and coordinating bodies to ensure coherence and functionality, as seen in Spain. German evaluators considered the elimination of payment entitlements in Germany as a simplification in the IACS area. However, in some cases, like Czechia, evaluators recommended providing further details in the CSP to promote synergy by sharing data among different relevant actors. For the remaining four CSPs, the *ex ante* evaluations made no reference to this issue (CY, EE, HU, SE).

A total of 20 *ex ante* evaluators confirmed, at least to a fair extent, that the CSPs reflected simplification in non-IACS application and control procedures, as well as the introduction of other solutions to achieve simplification and a reduction of administrative burden on farmers and other beneficiaries (AT, BG, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, MT, NL, PL, RO, SI, SK). For the eight remaining CSPs (BE-FL, BE-WL, CY, CZ, LU, LV, PT, SE), the *ex ante* evaluations did not make any reference to either JC. Several CSPs mentioned the use of simplified cost options, such as unit costs, lump sum financing and flat rates, as well as the use of technologies, such as geotagged photos and videos, to verify the eligibility and completion of operations and investments. However, some evaluators also expressed concerns regarding the full assessment of the extent to which the CSPs led to simplification for beneficiaries. This concern arose because the details of simplification measures were only to be defined at a later stage in guidelines and instructions.

For instance, evaluators for the Austrian and Bulgarian CSPs both mentioned the use of flat rates, lump sum financing and unit costs as simplification measures. The evaluators of the German CSP suggested enhancing information policy and providing sound support for beneficiaries in submitting applications and proceeding to payments. In Hungary, evaluators highlighted the potential sources of information and support for farmers, such as the Green Support Network via the Village Farmer's Network. In Ireland, evaluators confirmed that the Irish CSP explained several online measures to facilitate the process for applicants and that relying on external support for unit costs and income forgone claimed for eco-schemes could help reduce administrative burden. In Denmark, evaluators emphasised the role of 'user journeys' in simplifying application processes and introduced a new concept called 'customer involvement'. In Lithuania, evaluators noted that the CSP had taken action to address simplification and reduction of the administrative burden by updating software capable of monitoring farm fields, creating a platform for training topics, and including activities of the National Rural Network contributing to simplification and administrative burden reduction. In the Netherlands, evaluators mentioned that the introduction of a 'steering house' to improve efficiency and harmonisation was considered.



2.4.1.3 Completeness and information missing

In general, all evaluators assessed the measures proposed in the CSPs to reduce administrative burdens for farmers and other beneficiaries, although not all evaluations provided the same level of detail when tackling this criterion. More specifically, the *ex ante* evaluations of the following four CSPs – Cyprus, Estonia, Hungary and Sweden – did not specifically mention the simplification of IACS control, and no further explanations were given as to why this was missing. Similarly, the *ex ante* evaluations of the following eight CSPs – Flanders (Belgium), Wallonia (Belgium), Cyprus, Czechia, Luxembourg, Latvia, Portugal and Sweden – did not make any specific reference to the simplification of non-IACS application and control or the introduction of other solutions to achieve simplification and a reduction of administrative burden for farmers and other beneficiaries. Additionally, for Sweden, the CSP had no information concerning measures taken to reduce administrative burden using various digital application systems.

2.4.1.4 Ex ante evaluation recommendations

Regarding administrative burden, a set of 44 recommendations were outlined in Annex I, constituting 2% of the overall recommendations. The MA did not provide any details on whether or not they have addressed these recommendations in 5% of the cases (Figure 16). However, for the remaining cases, information was provided indicating that 34% of the recommendations resulted in modifications to the CSP. As for the remaining recommendations, it was explicitly

stated that in most instances the points raised would be considered during the implementation phase, although no alterations were made to the CSP.

The most common recommendations included further simplifying the policy in the national CSP and implementation documents but also promoting the use of digital application systems and enhancing interoperability between public information systems. For example, the German evaluator suggested further investments in technology to improve the accuracy and standardisation of systems, such as enabling the uploading of geo-referenced information via digital interfaces and its download for farmers' purposes. Greek evaluators emphasised the importance of effective communication with farmers throughout all steps of the IACS procedures to prevent errors. Similarly, the Irish evaluator proposed the introduction of automated and continuous checks using satellite data and other sources and recommended improving communication with farmers to ensure compliance with control procedures. Additionally, some evaluators recommended better planning of the programme cycle, more targeted use of technical assistance to lower the administrative burden, and further specification of the role of various stakeholders. Several evaluators recommended making more use of the national CAP network to provide interested applicants with necessary information about the CSP.

The majority of the recommendations (34%), were made across multiple objectives (Figure 17).

Figure 16. Induced changes of recommendations on the administrative burden

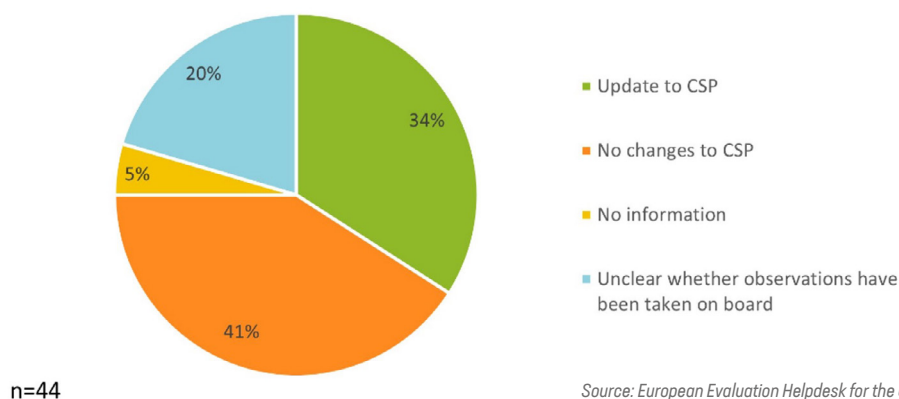
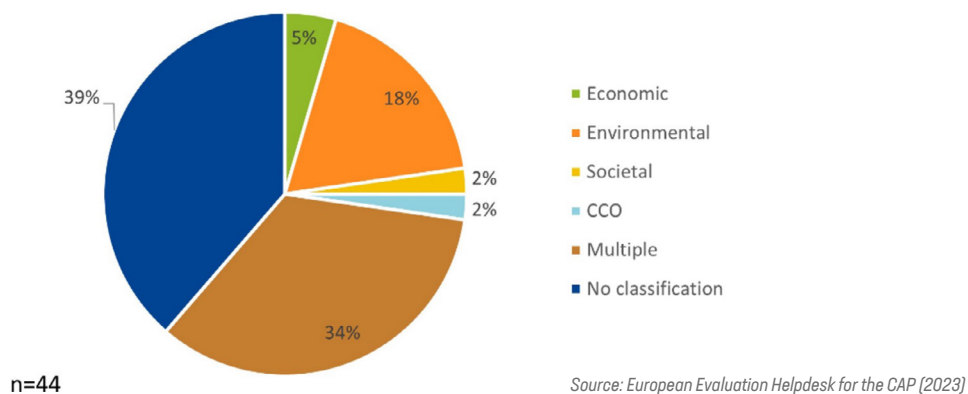


Figure 17. Administrative burden recommendations by types of objectives



2.5 Assessment of horizontal themes

2.5.1 SQ10: To what extent do the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy?

As mentioned before, the EH considered that the JC associated with SQ10 and SQ11 do not reflect provisions outlined in Article 139 of Regulation (EU) 2021/2115 (see Methodological approach, [Section 1.2.3](#)). Therefore, the map figures produced under SQ10 and SQ11 were developed using a different methodology than the ones applied for the previous SQs (for more information, see Methodological approach, [Section 1.1.7](#)).

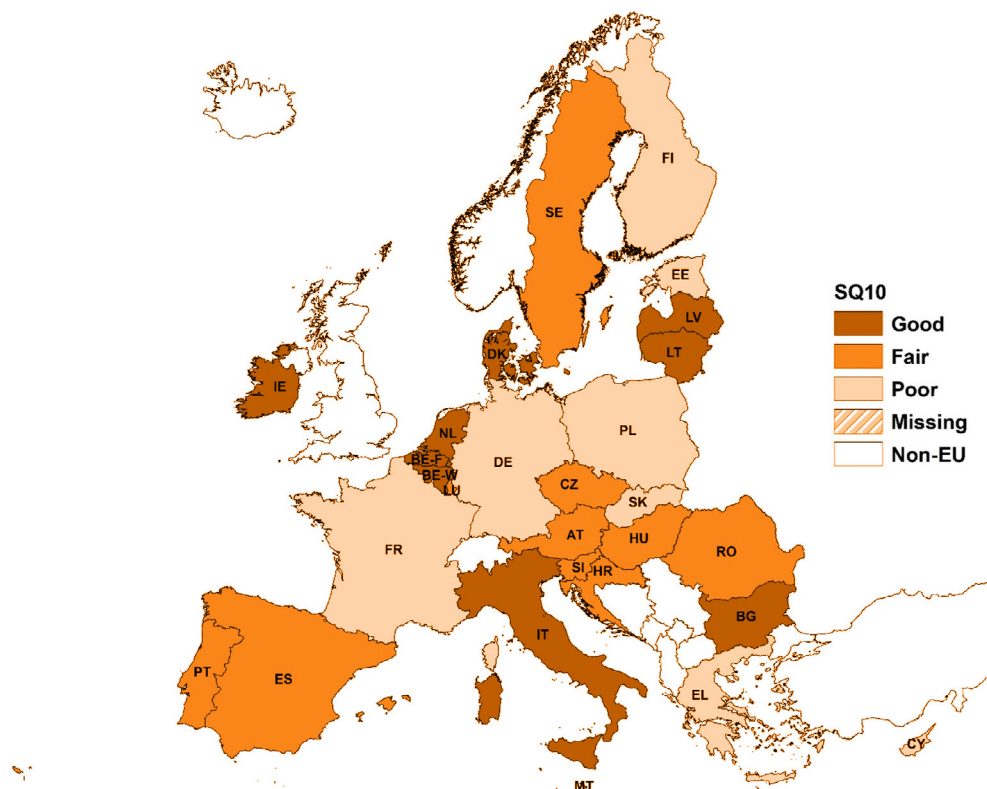
2.5.1.1 Key findings from *ex ante* reports

- All CSPs provided explanations about how they intended to contribute to achieving national Green Deal targets, although in most cases, the *ex ante* evaluations did not comprehensively consider the Green Deal targets in their evaluations (as this was not foreseen by the Regulation).
- Twenty *ex ante* evaluations confirm that the CSPs fairly reflect their intended contributions towards some of the selected EU-level targets arising from the Farm to Fork Strategy and Biodiversity Strategy. The most frequently addressed Green Deal targets were those related to organic agriculture, excess nutrients and agricultural area under high-diversity landscape features. The targets related to the decrease in the use and risk of pesticides and antimicrobial resistance are less discussed. Fast broadband internet rollout was hardly considered by the CSPs.
- Eight-teen *ex ante* and SEA reports found that the CSPs explicitly provided a sound explanation of how the GAECs and Statutory Management Requirements (SMRs) support the achievement of national Green Deal targets.
- Main recommendations point to the effectiveness of interventions, the ability to attract farmers to voluntary schemes, such as eco-schemes, and the potential negative impacts on the environment due to other interventions.

2.5.1.2 Analysis

[Map 10](#) shows that 20 *ex ante* evaluations confirm that the CSPs (AT, BE-FL, BE-WL, BG, CZ, DK, ES, HR, HU, IE, IT, LT, LU, LV, NL, PT, RO, SE, SI, SK) are assessed at least as 'Fair' in terms of the extent to which they reflect their intended contributions towards some of the selected EU-level targets (e.g. the increased share of organic agriculture, the reduction in the use and risk of pesticides, the decrease in the use of antimicrobials, excess nutrients and nutrient utilisation) arising from the Farm to Fork Strategy and Biodiversity Strategy, and/or the CSP sets non-legally binding national values to reflect some of the targets set out in the Farm to Fork Strategy and Biodiversity Strategy.

Map 10. To what extent do the *ex ante* evaluation reports conclude that the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy?



Source: European Evaluation Helpdesk for the CAP (2023)



The extent to which CSPs reflect their intended contributions towards the selected EU-level targets arising from the Farm to Fork Strategy and Biodiversity Strategy is crucial for assessing Member States' responsiveness to Green Deal targets. It should be noted that the *ex ante* evaluations, as defined in Article 139 of Regulation (EU) 2021/2115, did not include an assessment of alignment with the Green Deal targets. However, part 2.3.3 of all approved CSPs is entitled 'Consistency with and contribution to the Union targets for 2030 set out in the Farm to Fork Strategy and the EU Biodiversity for 2030', and it contains relevant justifications or quantitative targets. Therefore, all CSPs were required to provide explanations and a rationale for how the green architecture aimed to contribute to the national Green Deal targets, regardless of whether they were quantified. Most Green Deal targets are related to the natural resource and environmental dimensions of the CSP. Consequently, the assessment of intervention impacts and the consistency among the building blocks of the green architecture to support the Green Deal targets were primarily addressed in the SEA rather than the *ex ante* evaluation. The SEA evaluated the potential environmental impact of the CSP in the context of the Green Deal in 17 CSPs (AT, BE-FL, BE-WL, BG, CZ, DK, ES, HR, HU, IE, IT, LT, LV, MT, NL, RO, SI).

The *ex ante* evaluations and the SEA reports confirmed that the most frequently addressed Green Deal targets were those related to organic agriculture, excess nutrients and agricultural area under high-diversity landscape features. The targets related to the decrease in the use and risk of pesticides and antimicrobial resistance are discussed less. Fast broadband internet was treated as if it was not part of the Green Deal and not the subject of CSPs, and only a few *ex ante* evaluations (LV, LT, SE) made reference to the target and two SEA reports (IT, PT) explained how the CSP would contribute towards the target of 100% accessibility to broadband internet.

Eighteen *ex ante* and SEA reports found that the CSPs explicitly provided a sound explanation of how the GAECs and SMRs support the achievement of national Green Deal targets (AT, BE-FL, BE-WL, BG, DE, DK, EE, ES, HU, IE, IT, LT, LV, MT, NL, PT, RO, SK) while ten *ex ante* and SEA reports did not make any reference to this issue (CY, CZ, EL, FI, FR, HR, LU, PL, SE, SI). The picture is the same as concerns how the eco-schemes and environmental, climate-related and other management commitments support the achievement of Green Deal national targets, but it changes when other interventions such as investments or training are considered. Only 13 *ex ante* and SEA reports noted that the CSPs contained a rationale of how to utilise investments, training and other interventions to address the Green Deal (AT, BE-FL, BE-WL, BG, CZ, DK, IE, IT, LT, LV, MT, RO, SI).

Regarding whether interventions implemented through eco-schemes and environmental, climate-related and other management commitments directly address all Green Deal targets, this is sometimes done innovatively with a new application design or by reinforcing existing trends and policies. For instance, in Austria, the adoption of 'Results-based management' measures aims to lead to an increase in nature conservation areas to over 80 000 ha. This measure was specifically designed to prioritise areas of significant value to nature conservation, as determined by the Member State's nature conservation authority. Conversely, the evaluation of the Dutch CSP highlighted the Member State's commitment to using 25% of agricultural land for organic farming by 2030. Other evaluators stated how the CSPs promote specific sustainable production systems, including integrated management, such as

in Malta, Romania, Italy, Luxembourg, Austria, the Netherlands and Germany, which target a decrease in the use of pesticides.

As concerns the extent to which CSPs set non-legally binding 'national values' to reflect selective targets set out in the Farm to Fork Strategy and Biodiversity Strategy, the numbers are extremely low. Few SEA reports record numerical estimates and when they do, these refer to forecasted result indicators and not to actual impacts. One example highlights this point. The Green Deal targets for 2030 to (a) reduce fertiliser use by at least 20%, and (b) reduce nutrient losses by at least 50%, is related to the result indicator R.22 'Sustainable nutrient management: Share of Utilised Agricultural Area (UAA) under-supported commitments related to improved nutrient management'. However, this result indicator does not reflect a direct decrease in fertiliser use and sales and says even less about potential nutrient leakage. Thus, unless the MA specifically requested an impact assessment to be carried out, any conclusions from evaluators on the potential impact of interventions linked to these results indicators are considered to be lacking in evidence. For this reason, evaluators did not comment on potential impact, and the CSPs rarely provide 'national values'. Nevertheless, a few evaluators attempted to provide some potential impacts. The SEA for Flanders (Belgium) estimated that if all the pre-set targets for the eco-schemes and agri-environment climate commitments were met, the total use of nitrogen would decrease by 4% of the total nitrogen use from livestock manure and fertilisers in 2020. In Ireland, the CSP, referenced by the *ex ante* evaluation, records national targets set in specific policy documents such as the food vision 2030, which refers to a 50% reduction in nutrient losses from agriculture to water without any other justification. The same 50% reduction is recorded in the Italian *ex ante* evaluation. In the case of Denmark, the SEA made extensive reference to the likely impacts of GAEC 2 for the protection of wetlands and peatlands or of interventions like the coupled payments for suckler cow, and concluded that "However, calculating the concrete environmental impact depends on the nature of the activity restrictions (the level of a quota reduction), as well as the alternative land use that farmers choose if they do not keep the land in rotation as before".

In the case of the contribution of the CSPs to organic agriculture, 11 *ex ante* evaluations (BE-FL, BE-WL, BG, DK, FR, IE, IT, LT, LU, LV, SE) record a numerical estimate for the simple reason that this contribution is measured directly by result indicator R.29 on 'Development of organic agriculture: Share of UAA supported by the CAP for organic farming, with a split between maintenance and conversion' for which there are estimated future values. For example, the SEA for Flanders (Belgium) recorded the CSP's forecast for organic agriculture at 9 500 ha, corresponding to 3% of UAA, characterised by the SEA as a very modest contribution. Similarly, the Irish *ex ante* records a figure of 7.5%, the Italian SEA of 25%, the Lithuanian of 13%, the Latvian of 20%, and the SEA in Malta for 0.77%. In Sweden, the *ex ante* records a target for 30% of UAA and 60% of consumed food to be organic, but the *ex ante* evaluators were very critical and stressed potential negative trade-offs between reducing GHG emissions and increasing organic production and consumption. More specifically they highlighted the risk of potential carbon leakage if domestic organic production were to increase. There are also CSPs which set targets as a percentage of the CSP's current situation. For example, the French SEA records the CSP's intention to double the area under organic farming and to increase organic farms to 22% of total farms.



2.5.1.3 Completeness and information missing

There are two issues related to completeness and missing information. First, describing and assessing how a CSP serves the Farm to Fork Strategy and Biodiversity Strategy is not one of the *ex ante* reporting areas laid down in Article 139 of Regulation (EU) 2021/2115. Therefore, it is possible that these aspects were overlooked in the *ex ante* or SEA reports. It may have been challenging during the *ex ante* or SEA process to accurately forecast the impact of various interventions on nutrient leakage or pesticide reductions. Therefore, it would have been risky for the *ex ante* and SEA assessments to evaluate anything beyond the underlying logic of how the CSPs aimed to contribute to the Green Deal targets.

To examine whether the absence of data on Green Deal quantitative targets was a result of evaluators from the *ex ante* and/or SEA not including them in their reports, or due to the CSPs not establishing these targets, the EH consulted the study 'Mapping and Analysis of CAP Strategic Plans for 2023-2027'. This study has provided a preliminary but exhaustive list of CSPs and their Green Deal targets. For nutrient loss, which was analysed from the *ex ante* and/or SEA perspective, the 'Mapping and Analysis of CAP Strategic Plans for 2023-2027' study concludes that 19 CSPs do not report a national Green Deal target, eight CSPs refer to a national target to reduce nitrogen surplus, ranging from 6.5% to 50%, and one CSP mentions a national target, but does not provide it in the CSP. Concerning organic agriculture, a Green Deal target that is more easily quantified, the 'Mapping and Analysis of CAP Strategic Plans for 2023-2027' found that 10 CSPs have set intermediate targets between 5% and 15%, 11 have set higher targets above 15% of UAA, and seven have set lower targets of below 5%. From the discussion above, it is evident that missing data on the Green

Deal targets by *ex ante* and SEA evaluations is largely due to the fact that these figures were not provided by the CSPs, rather than omitted by the evaluations.

2.5.1.4 *Ex ante* evaluation recommendations

However, at least three evaluations identified several limitations and provided recommendations based on the SEA reports (e.g. HU, LT, LV). These recommendations revolved around three distinct concerns: the effectiveness of interventions; the ability to attract farmers to voluntary schemes; and, the potential negative impacts on the environment due to other interventions. Firstly, there were doubts regarding the effectiveness of the proposed interventions. For instance, questions were raised about the extent to which the use of pesticides would be reduced or nutrient leakage to watercourses would decrease. In a typical example, the Lithuanian SEA report acknowledged that the measures proposed by the CSP would have a positive impact, but their effectiveness and scope were deemed insufficient to halt biodiversity loss. There were doubts about the efficiency of the CSP in attracting farmers to sign up for voluntary schemes, particularly considering the low unit amount proposed. Given this low unit amount, SEA evaluators expressed concerns about whether the intended environmental and climate-related outcomes would be realised, such as in Hungary. The third concern related to the potential negative trade-offs on the environment, including Green Deal-related targets, resulting from other interventions such as direct payments and investment interventions (LV). For example, Latvia's *ex ante* evaluator recommended that the CAP network should review investment measures to identify those that may have adverse impacts on biodiversity and how best to avoid such impacts through case studies of good and less good practices.

2.5.2 SQ11: To what extent does the CSPs' environmental and climate architecture contribute to achieving environmental and climate ambition?

2.5.2.1 Key findings from *ex ante* reports

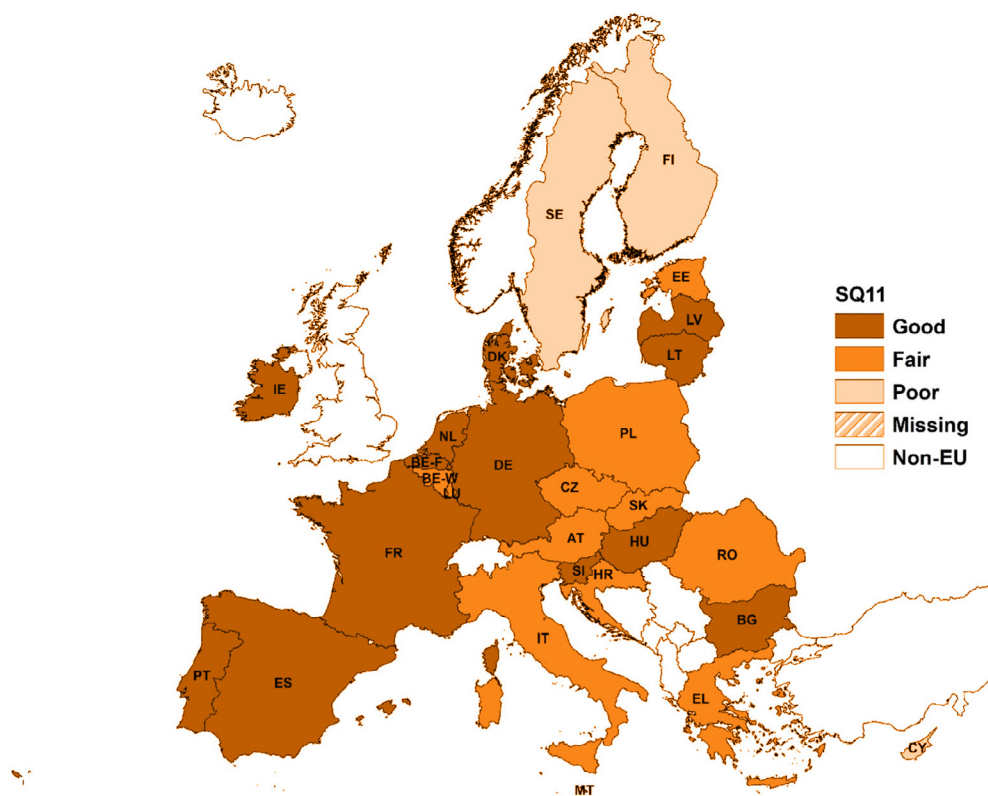
- The vast majority of *ex ante* evaluation reports conclude that the CSPs demonstrate a contribution to environmental and climate ambitions.
- 26 CSPs have at least shown a fair degree of ambition for at least two environmental and climate objectives (SO4, SO5, SO6), or have set and demonstrated ambitious environmental and climate goals.
- 21 CSPs provide evidence of increased climate ambition through their overall contribution to climate mitigation and adaptation.
- Main recommendations point to considering environmental aspects in the selection criteria and promoting environmentally friendly designs, preventing interventions that affect, for example, water regimes and intensifying the use of fertilisers and plant protection products.
- The establishment of monitoring mechanisms was suggested to assess the environmental impact and progress towards environmental objectives.
- The stated CSPs' contributions that were based on impacts may be questioned and disputed. Impacts might be contested based on poorly implemented effectiveness analysis, failure to consider carbon leakages and other possible adverse effects.
- Evaluators expressed concerns regarding the actual simplification resulting from measures, as specific guidelines and instructions for implementation are yet to be defined.
- Recommendations primarily emphasise the need for policy simplification in the national CSP, the advancement of digital application systems, and enhanced interoperability among public information systems.

2.5.2.2 Analysis

[Map 11](#) shows that 25 *ex ante* evaluations confirmed that the CSP's environmental and climate architectures are assessed at least as 'Fair' in terms of the extent to which they contribute to achieving environmental and climate ambition.



Map 11. To what extent do the *ex ante* evaluation reports conclude that the CSPs' environmental and climate architecture contributes to achieving environmental and climate ambition?



Source: European Evaluation Helpdesk for the CAP (2023)

Article 105(1) of Regulation (EU) 2021/2115 states that “Member States shall aim to make, through their CSP sand in particular through the elements of the intervention strategy referred to in Article 109(2), point (a), a greater overall contribution to the achievement of SO4, SO5 and SO6”, in comparison to the overall contribution made to the achievement of the objective on “sustainable management of natural resources and climate action, with a focus on GHG emissions, biodiversity, soil and water” that was laid down in Regulation (EU) 1306/2013⁹ and concerned with support under the EAGF and the EAFRD in the period 2014-2020. Therefore, the 2014-2020 programming period is considered the baseline against which Member States must demonstrate that elements of the intervention strategy addressing SO4, SO5 and SO6 will achieve a more significant contribution to environmental and climate outcomes.

However, there are two issues related to this endeavour. First, Article 139 of Regulation (EU) 2021/2115 does not require *ex ante* evaluations to carry out this assessment. Nevertheless, every single CSP contained an explanation of how it intended to achieve a greater overall contribution, as specified in Article 105 of Regulation (EU) 2021/2115 and provides the relevant justification. Therefore, all CSPs included explanations and rationale for higher environmental and climate ambition, although the *ex ante* evaluation might not have conducted an assessment on this aspect. Second, it was not possible to provide clear guidance on a methodological approach to substantiate a credible claim for a ‘higher’ contribution, given the range of variables concerned.

The CSPs can employ qualitative and quantitative approaches to establish arguments demonstrating higher ambition. One approach is to compare budget allocations. When everything else is the same, a higher budget allocation can imply more beneficiaries, more land covered under a certain intervention, increased investments, or all the above. Another approach is to compare the expected output and result indicators with previously offered comparable interventions. This helps determine if the CSP is aiming for higher ambitions. Additionally, higher ambition can be justified by introducing new measures to address new challenges, proposing innovative solutions to existing problems, or implementing more extensive and stricter conditionalities. Together these provide signs to indicate a higher level of ambition.

In addition, reference in the CSPs to significant climate change and energy commitments or action plans, resource conservation and protection strategies, and management frameworks, or the Biodiversity Strategy, provides reassurance of awareness, which also addresses expectations that the CSP is in sync with its intervention strategy.

The assessment of whether the CSPs' green architecture provides evidence of increased climate ambition through their overall contribution to climate mitigation and adaptation was documented in 21 CSPs, through at least one of the following criteria related to climate mitigation and adaptation, i.e. (a) increase in area-funded and conditionality as well as non-area funded interventions (AT, BE-FL, BE-WL, BG, CZ, DE, DK, EE, ES, FR, LT, LU, MT, NL, RO, SI, SK);

⁹ Regulation (EU) 1306/2013 of the European Parliament and of the Council of 17 December 2013 on the Financing, Management and Monitoring of the CAP and Repealing Council Regulations.



(b) reference to targets set by interventions recommended by the National Energy and Climate Plans (NECPs) and the NAPs (AT, BE-FL, BG, CZ, DE, DK, EE, ES, HU, IE, IT, LT, MT, NL, PL, SI); and (c) quantified forecasts for decreased GHG emissions from agriculture or increased removals from Land Use, Land-Use Change and Forestry (LULUCF), increased energy production from renewables and increased energy efficiency (BE-FL, BG, CZ, DE, DK, ES, HU, IE, LT, NL, PT, SI, SK). Based on the assessment, evaluators found that four CSPs (CY, LV, PT, SE) did not demonstrate higher climate ambitions. For example, in Latvia, evaluators concluded that GHG emissions were expected to increase, but at a slower rate than in the previous programming period. For the remaining CSPs, evaluators were cautious about the potential impact of the CSPs on GHG reductions or mitigation. In Denmark, for instance, the SEA evaluators noted that it remained to be seen to what extent the interventions addressing GHG emissions or mitigation would be adopted and what their actual impact would be. For the Greek CSP, evaluators concluded that overall, it was more ambitious for the environment and the climate compared to the previous programming period. Additionally, several evaluators identified potential promising interventions, although they did not explicitly focus on higher climate ambitions compared to the baseline. This was observed in the CSPs of Ireland, Germany, Denmark, France and the Netherlands.

Furthermore, several evaluators confirmed that certain CSPs did not fully meet the ambitions outlined in the NECPs (EL, LV, PT, RO, SK). In most cases, while evaluators mentioned the link between the NECPs and the CSPs, the reference was often weak, except in a few instances. For example, regarding the Flemish (Belgium) CSP, evaluators noted a positive contribution to several priorities in the Flemish Climate Policy Plan (2021-2030), particularly in the area of energy emissions (CO₂ emissions). Evaluators of the Italian CSPs thoroughly analysed the different interventions that contributed to the NECP. As far as it was possible to ascertain, the evaluators of the Dutch CSPs were the only ones to confirm that the agricultural sector would achieve the established targets, notably through the CSPs, by 2030.

In general, according to evaluators, few CSPs quantified forecasts for decreased GHG emissions or increased removals from LULUCF. While some interventions were identified as positively or negatively contributing to it (e.g. CY, EL, FR, HU, LT, LV), evaluators noted that the CSPs relied on conditionality to avoid further GHG emissions from land use changes (e.g. ES, DE). In the case of the Irish CSP, evaluators estimated that it would help deliver abatement of 1.3 MT CO₂-eq in 2030 and would make a significant contribution to the LULUCF chapter under their Climate Action Plan, but they also note that to reach the set target, other actions beyond the CSP should be foreseen.

In total, 24 SEA or *ex ante* evaluation reports confirmed that for at least one of the five environmental aspects, the CSPs' green architecture provided at least fair evidence of environmental ambition through their overall contributions to water, soil and air protection, conservation and sustainable management (all except CY, CZ, FI, HR). However, the evaluators did not necessarily demonstrate an increased ambition compared to the previous programming period in terms of spending or area of land targeted, as such assessments were made only for two of the five environmental elements. The other three elements dealt with (a) actions recommended by management and action plans, (b) setting national targets and (c) protecting areas specifically at

risk of soil erosion. Only the evaluators of France's CSPs concluded that the CSPs did not exhibit higher environmental ambitions. They regretted that only a few measures directly targeted the problem at its source. For the other CSPs, in most cases, evaluators identified the different measures and noted their positive contributions towards environmental objectives. However, in a few reports, evaluators confirmed greater environmental ambitions in Flanders (Belgium), Denmark, Greece, Malta, Lithuania and the Netherlands. For instance, in Flanders (Belgium), evaluators noted that the CSP had the potential to contribute twice as much as the previous programming period in terms of reducing pesticide use. It is interesting to note that in terms of funding allocation, evaluators concluded that interventions under environmental objectives competed against each other. Specifically, evaluators mentioned that allocating more funds to one environmental objective could limit the resources available for another, creating a scenario where prioritising one goal might adversely impact another due to finite budgetary constraints. In Lithuania, evaluators compared eligible areas under targeted interventions and concluded, for instance, that the CSP showed higher soil protection ambition compared to the previous programming period.

Generally, evaluators state that the CSPs have made efforts, though not always successful, to emphasise the use of conditionality as a strategy to achieve higher environmental goals. The Spanish *ex ante* evaluation report indicated that the CSP implements two GAECs and one SMR to reduce ammonia emissions and particulate matter. In Portugal, the introduction of the obligation to control protection zones for groundwater for public supply was considered to reflect a stronger environmental commitment. Poland's approach involved conditionality in safeguarding significant carbon sinks in wetlands and peatlands. In Luxembourg, the protection of peatlands and wetlands was combined with biodiversity preservation by simultaneously including all relevant areas under the management of the Habitats Directive and increased obligations under GAEC 2.

Regarding whether the CSPs' green architecture provide evidence for increased ambition in providing biodiversity and ecosystem services through its overall contribution to environmental conservation, this was divided into three criteria: (a) higher ambition for the protection of biodiversity resources, preserving habitats and species, increasing the area with landscape features and the supply of ecosystem services more extensively and ambitiously than in the previous programming period due to area-funded and conditionalities and due to non-area funded interventions; (b) the CSPs increase the spatial targeting or introduce specific measures, and make direct reference to targets and measures included in the Biodiversity strategy or the Prioritised Action Frameworks of Natura 2000 areas, the NAPs, etc.; and (c) the CSPs contain an integrated approach to agricultural and forest land within Natura 2000 areas that target more beneficiaries and covers a more significant extent of the Natura 2000 area. For each of the first two criteria, there were 12 *ex ante* reports where both were simultaneously fulfilled (BE-FL, BG, DE, ES, FR, HR, HU, LT, LV, LU, NL, SI). For example, in the case of Bulgaria, the GE mentioned that the SEA non-technical summary indicated a number of needs and interventions under SO6, which specifically addressed the aspects of biodiversity resource protection, preserving habitats and species, increasing the area with landscape features and the supply of ecosystem services. Whereas in the case of other CSPs like Flanders (Belgium) and the Netherlands, quantitative data was given to emphasise the higher ambition. For instance, in the case of Flanders (Belgium), the conditionality GAEC-8a imposes a minimum



share of 3% or 4% of the non-productive area on participating farms, which was 1.3% in 2021 and is thus expected to more than double in the new CSP. Similarly, for the Netherlands, ambition was quantified by saying that the Agricultural Nature and Landscape Management measures will be covering up to 130 000 ha instead of the 104 000 ha previously. The SEA reports confirmed that the third criterion was fulfilled by 11 CSPs (BE-FL, BE-WL, BG, DK, FR, IE, LT, NL, PL, PT, SI). For example, the SEA in Slovenia referred to specificities which were taken into account, and the CSP focused appropriately on biodiversity in the agricultural and forest landscape. The financial tables showed that the envisaged payments for comparable AECMs from the previous period have increased. The link between the use of funds and effects was clear, unit rates were provided and the calculations for determining the amount of support were produced by the independent institution. In Flanders (Belgium), the SEA showed that the Natura 2000 intervention aimed at strengthening the ecological landscape value and biodiversity (field and meadow birds and insects). In addition, substantial budgets (EUR 28 million Natura 2000, EUR 24 million for ecological connections; EUR 43 million for flora and fauna), were expected to make a very important contribution to SO6.

2.5.2.3 Completeness and information missing

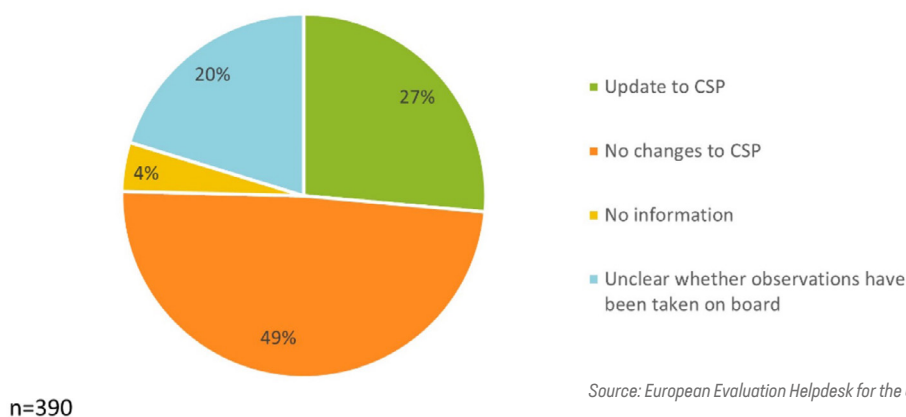
There are two issues related to completeness and missing information. Firstly, although the justification for higher environmental

ambition is inherently an *ex ante* activity, Article 139 of Regulation (EU) 2021/2115 does not outline the pursuit of it. Thus, it could have been overlooked by *ex ante* and SEA reports. At the same time, part 3.1.3 of any approved CSP offers an “Explanation on how to achieve the greater overall contribution set out in Article 105 of Regulation (EU) No 2021/2115”. As such, even if not present in the *ex ante* and SEA reports, all approved CSPs provide explanations and rationales for how they intend to achieve higher environmental ambition. Second, it was not possible to provide clear guidance concerning a methodology for showing how to justify, on serious methodological grounds, ‘higher’ environmental ambition, given the number of variables involved. Therefore, making such assertions could have been potentially a rather uncomfortable issue for the *ex ante* and SEA exercises.

2.5.2.4 Ex ante evaluation recommendations

Based on information collected through Annex I of the CSPs on the submitted *ex ante* evaluation reports, there were a total of 390 recommendations derived from the SEA which can be linked to SQ10 and SQ11. This implies that 21% of the recommendations were SEA specific ones. Out of these, 27% led to changes in the CSP, 49% led to no changes in the CSP and for the remaining balance, it is unclear from the information provided whether or not changes were made to the CSP (Figure 18).

Figure 18. Induced changes of recommendations made from the SEA



Some of the comments which led to an update of the CSP include efforts aimed at mitigating the environmental impact of certain interventions by considering environmental aspects in selection criteria and promoting environmentally friendly design (MT, RO, SI, SK). Other comments address the protection of wetlands and peatlands, emphasising the need to prevent interventions that affect water regimes and intensify the use of fertilisers and plant protection products. Buffer zones, mitigation measures, and the avoidance of negative effects on habitats and species in wetland and peatland areas are also emphasised.

Several comments suggested the establishment of monitoring mechanisms to assess the environmental impact and progress towards environmental objectives. This included evaluating annual environmental performance, identifying areas for improvement and implementing corrective actions when necessary.

Other recommendations highlighted the importance of providing training and technical support to promote best practices, low-impact technologies and ecological criteria. They also emphasised the need to increase awareness and education among the population regarding healthy lifestyles, ecological farming and the efficient use of agricultural ecosystems. For instance, in Greece, specialised advisory services in environmentally degraded areas due to agricultural activities will be taken into account in the calls for interventions.

Although the majority of recommendations emanating from the SEA were not directly addressed in the CSP, information was provided on these comments mainly by indicating that various topics for evaluation studies related to pesticide use, water, soil and other environmental topics will be taken into account in the evaluation of the CSPs.



2.6 Identification of common trends at the European level

2.6.1 Assessment of the context and needs

The *ex ante* evaluation reports generally confirmed that the context and SWOT analyses provided a comprehensive understanding of the current situation in agriculture and rural areas across Member States, covering economic, social and environmental aspects in a balanced manner. In fact, significant effort was made to collect and assimilate detailed data, information and studies for the SWOT analyses. Recommendations were provided, as regards to the use of more recent or more specific data, misplaced SWOT elements, and a more holistic approach ensuring an integrated view across SOs.

Exception made for a very few specific instances, the identification of needs appeared to be well rooted in the context and SWOT analyses. The majority of recommendations made by evaluators were related to the environmental and social dimensions, indicating the need to address them more effectively. While many CSPs referred to external policies in the identification of needs, their prioritisation was weaker. In general, gender-specific needs were not raised in the context of SWOT analyses or needs assessments, despite the CAP's commitment to promoting gender equality in rural areas through the CSPs. This commitment should have been translated under SO8, which aims to promote employment, growth and representation in decision-making processes, participation in farming businesses, social inclusion and local development. Furthermore, needs relevant to the CCO are, in general, underrepresented in the context analyses.

Regarding the use of financial instruments, needs were identified and discussed when the MA made a choice to use them, but this was often not the case when they decided not to use financial instruments. Therefore, it remains unclear whether the need exists and is addressed by external policies, the need exists and is not addressed by a policy, or simply the need does not exist.

Finally, reference to lessons learned varies for many reasons, the most important one being whether there are ready-to-use evaluations and conclusions from implementing similar interventions in previous programmes.

2.6.2 Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) and the consistency of the allocated resources as well as the suitability of the selected targets and milestones.

Evaluators confirmed the overall consistency between the proposed intervention strategy and the identified national and regional needs in most cases (27 out of 28 CSPs). However, this could be further improved by specifying the eligibility conditions of the different interventions more precisely.

Lessons learned from past programming periods were considered in the design of intervention strategies in many CSPs, aiming to build on successes, improve interventions and ensure continuity. This reflects a focus on incorporating previous experiences and knowledge, but it also carries the risk of maintaining the status quo. Nonetheless, a relevant number of *ex ante* evaluation reports did not report information on the actual use of past experiences for the design of the intervention strategy (10 CSPs, SQ4.3), or for its internal consistency (12 CSPs, SQ5.3). The evaluators generally confirmed that there is coherence between the interventions, although the

assessment of coherence was dependent on the level of detail provided by the draft CSPs, which formed the basis of the evaluation.

The majority of *ex ante* evaluation reports confirmed that the allocated budgetary resources for each intervention were justified by the assessment of needs and were coherent with the targets for result indicators. However, interventions under the general environmental objective tended to compete in terms of budget due to the wide variety of identified needs. Therefore, a common recommendation was to explore and strengthen the synergies between interventions that primarily focus on other SOs and their potential synergies or trade-offs with SO4, SO5 and SO6, but also with SO8.

Only eight evaluators confirmed that the proposed transfers of allocated budgetary resources between direct payments, sectoral types of interventions and rural development interventions were at least fairly stated and justified in the financial plan, although they highlighted the need for further improvements. This general lack of justification in 19 of the CSPs (excluding the case of Poland, where the justification was provided but was not accepted by the evaluator), accompanied by the lack of assessment regarding the justification of transfers, constitutes a significant weakness.

This is also reflected in the assessment of the external coherence of the CSPs, as *ex ante* and SEA evaluators across all Member States confirmed external coherence with other policies. However, the degree of detail and assessment of external coherence varied significantly between CSPs.

2.6.3 Assessment of the expected outputs, results and impacts of programmes/plans

Target values for result indicators are primarily derived from the prioritisation of needs, and the methodological basis for calculating these values is either provided or implied, with quantified outputs set out in most *ex ante* evaluation reports (26 CSPs). In 12 of the *ex ante* evaluations conducted, the milestones were considered appropriate and consistent. However, the identification of factors that influence target values, such as identified needs, planned intervention budgets, previous experience, absorption capacity and other external factors, exhibited significant variation among CSPs.

However, only 12 *ex ante* evaluation reports confirmed that the annual milestones were, at least, fairly suitable for each relevant result indicator. In such instances, the differences in milestones were clearly explained, especially annual milestones compared to previous programming periods, whereas only 13 *ex ante* evaluation reports concluded that lessons learned from past experiences underpinned the design of interventions, target values and milestones, although references to past experiences were often undocumented.

Several recommendations were provided by the evaluators, of which almost half led to an update of the CSPs. The majority of the recommendations addressed by the CSPs were associated with missing or inconsistent information, but other issues were touched upon, such as the need for more information on the timing of the milestones, information on assumptions in the setting of targets, re-visiting the intervention logic to ensure complementarity between the strategy, interventions and setting of target values. Interestingly, a recommendation was made to include information on the flexibility and adaptability of plans during implementation.



2.6.4 Assessment of the measures planned to reduce administrative burden

Overall, the common trend indicates a commitment to simplification and reduction of administrative burden, with a focus on digitalisation and coordination between the different bodies involved.

Evaluators mentioned that most CSPs had an adequate number of interventions to avoid unnecessary complexities in implementation and monitoring. Among the proposed measures, clear and consistent information, streamlined procedures and coordination between interventions stand out. However, some evaluators commented on the significant number of interventions related to the new Green Architecture, making implementation more challenging for farmers and the authorities.

Evaluators confirmed the simplification of IACS procedures in most CSPs but recommended that more details should be provided in the CSPs and that there should be a focus on effective communication with farmers to ensure compliance. Some Member States have already implemented online systems and tools like the AMS for eligibility control.

The most common recommendations pointed to further simplifying the policy in the national CSP and implementation documents, promoting the use of digital application systems and enhancing interoperability between public information systems. Additionally, evaluators raised concerns regarding the full assessment of the extent to which the measures would lead to simplification in practice, as details were yet to be defined in guidelines and instructions regarding implementation.

2.6.5 Assessment of horizontal themes (such as contribution to Green Deal and Farm to Fork Strategy objectives)

The SEA reports addressed primarily the contribution of CSP interventions to some of the Green Deal targets linked to organic agriculture, excess nutrients and agricultural areas with high-diversity landscape features. Contributions were often linked to the implementation of conditionality requirements via GAECs and SMRs.

The *ex ante* evaluations generally did not refer to the contribution of the CSPs to the target of 100% accessibility to broadband internet, with only a few evaluations mentioning this target.

Some evaluations raised concerns about the effectiveness of proposed interventions, the ability to attract voluntary participation from farmers, and potential negative trade-offs on the environment resulting from other interventions like direct payments and investments.

Most CSPs did not provide national values to reflect selective targets set out in the Farm to Fork Strategy and Biodiversity Strategy. Only a few CSPs included such values or estimates, mainly for organic farming and landscape features for which there were relevant indicators in the PMEF.

Regarding 'Higher Environmental and Climate Ambition', *ex ante* evaluations employed both qualitative and quantitative approaches to demonstrate higher ambition. This included comparing budget allocations as well as expected output and result indicators. While all CSPs show awareness of expectations and the need for synergy with environmental and climate policies in designing the intervention strategy, evaluators were cautious in estimating the potential overall impacts of the CSPs.

3. Appraisal of the *ex ante* evaluation reports

3.1 AQ1: To what extent are the *ex ante* evaluation reports complete, comprehensive and coherent?

3.1.1 To what extent are the *ex ante* reports complete?

3.1.1.1 Key findings

- All *ex ante* reports exhibit a clear structure. However, only slightly more than half present a clear focus, and findings on the same specific theme or topics are scattered across the reports and/or lack depth that hinder the extraction of meaningful insights.
- 20 *ex ante* evaluations are structured either by SOs and interventions or by evaluation steps.
- Nearly all *ex ante* evaluations fulfil the requirements linked to Article 139 of Regulation (EU) 2021/2115. Only Sweden is missing information regarding Article 139(a) of Regulation (EU) 2021/2115 on the SWOT, as this assessment was not part of the evaluation. Wallonia (Belgium) and Luxembourg are missing information regarding Article 139(c) of Regulation (EU) 2021/2115 on budgetary allocation.
- Only 13 *ex ante* evaluations fulfilled the assessment requirements for financial instruments linked to Article 139(g) of Regulation (EU) 2021/2115, while the remaining evaluations did not include financial instruments in their respective CSPs.



3.1.1.2 Analysis

The EH has assessed the completeness of the *ex ante* evaluation reports based on several criteria as outlined below:

- a. The *ex ante* evaluation reports have a clear structure;
- b. Each section of the *ex ante* evaluation reports has a clear focus, and it is straightforward to find the relevant information;
- c. The *ex ante* evaluation report is structured around SOs and/or evaluation steps;
- d. The *ex ante* evaluation report includes all relevant elements required under Article 139 of Regulation (EU) 2021/2115.

Regarding point d), as mentioned before, [Annex 2](#) provides a detailed breakdown of the SQs into several Sub-SQs and their accompanying JC, which are classified into two categories:

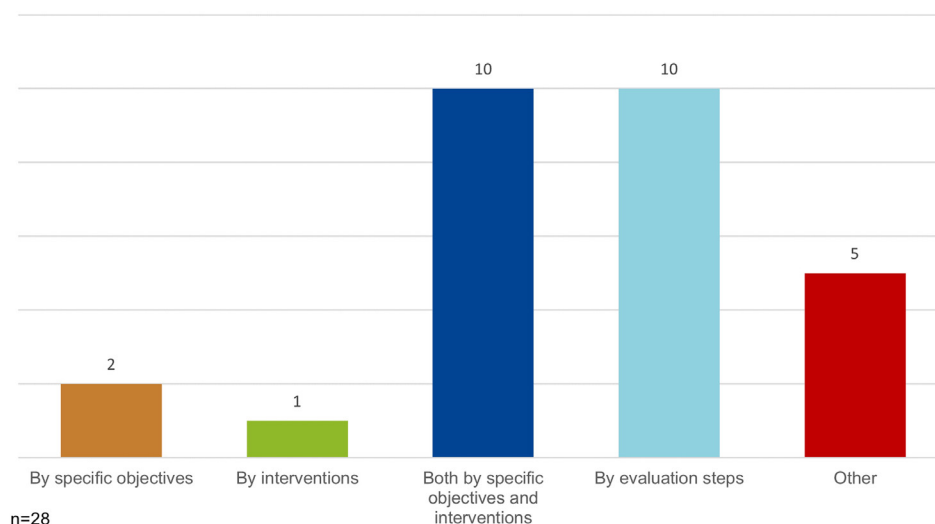
- > JC that reflect the requirements linked to Article 139 of Regulation (EU) 2021/2115 and set out in the analytical framework tables in [Annex 2](#).
- > JC that reflect *ex ante* evaluation practices not directly linked to Article 139 of Regulation (EU) 2021/2115.

To assess point d), the EH used information from the screening tool to appraise the completeness of the *ex ante* evaluation report.

Structure and focus of the *ex ante* evaluation reports

Overall, all *ex ante* evaluation reports had a clear structure, meaning that the content of the reports follow a logical flow and sequence of ideas. However, a few reports repeated issues in multiple sections or scattered information across sections (LT, RO), did not include overarching conclusions for several chapters (SK), had missing sections (MT), or lacked homogeneity (PT). As many *ex ante* evaluations were based on draft versions of the CSPs, in some instances, such as the Greek *ex ante* report, resulted in some confusion in the SWOT and needs assessment sections of the report. Despite the clear structure in all 28 *ex ante* evaluation reports, only 17 of them had a clear focus overall (AT, BE-FL, BE-WL, BG, CY, DE, EE, FI, FR, HR, HU, IE, IT, LU, LV, SE, SI). Specific topics or themes are addressed in several places, and/or are lacking depth or specificity. The remaining eight reports (DK, ES, LT, MT, PL, PT, RO) contained some sections with a clear focus and others that were less clear, and two reports (EL, SK) were assessed as having a lack of focus, which hampered the extraction of information for the synthesis exercise.

Figure 19. Structure used by the *ex ante* evaluation reports



Source: European Evaluation Helpdesk for the CAP (2023)

The preferred report structure among most *ex ante* evaluation reports was either based on SOs and interventions or based on evaluation steps such as the SWOT and need assessment, followed by the intervention logic, etc. Only a few *ex ante* evaluation reports chose to follow a structure based solely on SOs (DE and

SI) or interventions (SE). Among the 'other' category, five types of structures were identified, including reports that combined evaluation steps or themes with SOs (AT, CZ, PL, SK) or evaluation steps with interventions (IE).



Assessment of the requirements outlined in Article 139 of Regulation (EU) 2021/2115

The following four maps show the extent to which the *ex ante* evaluations of each Member State and region addressed requirements linked to Article 139(a) of Regulation (EU) 2021/2115 and Article 139(g) of Regulation (EU) 2021/2115. [Map 12](#) shows the extent to which the *ex ante* evaluation reports attempted to assess the JC for SQ1¹⁰. For the context and SWOT analyses, the *ex ante* evaluation was required to assess whether these: i) are comprehensive, complete and coherent; ii) are specific and indicate the extent to which they consider specific requirements for certain objectives; and iii) take into account lessons learned from previous CAP implementation periods. Seventeen *ex ante* evaluation reports addressed all three elements (shown in green). Ten *ex ante* evaluation reports addressed only two of the three elements (shown in orange). Only the Swedish *ex ante* evaluation does not provide information on any of these elements (see Analysis and synthesis of the evaluation themes, [Section 2.1.1](#)).

[Map 13](#) shows the extent to which *ex ante* evaluations attempted to assess the JC of SQ2¹¹. For the needs assessment and prioritisation of needs, the *ex ante* evaluation was required to assess whether these: i) followed a consistent and sound methodology; and ii) addressed national, regional and local specific needs, and also took into account the specific needs of specific geographic areas. Only eight *ex ante* evaluations assessed both JC (shown in green). The remainder of the *ex ante* reports assessed either one or the other criteria.

[Map 14](#) shows the extent to which *ex ante* evaluations attempted to assess the JC of SQ4¹². For the designed interventions, the *ex ante* evaluation was required to assess the following aspects:

- › the intervention logic shows or describes how the different types of interventions and conditionality, including their eligibility criteria and definitions, contribute to the SO to ensure significant positive impacts;
- › the designed interventions under each SO present a well-documented and evidence-based causal link with identified needs;
- › lessons learned from addressing national/regional needs with past interventions under Pillar I and Pillar II, their eligibility conditions and definitions have been considered when designing the intervention strategy, and whether these are documented or referenced in the CSP.

Seventeen *ex ante* evaluations assessed all the aforementioned JC (in green). The remaining 11 *ex ante* evaluations have assessed these partially, focusing only on the first two elements of the JC (in orange).

[Map 15](#) shows the extent to which the *ex ante* evaluations sought to assess the JC of SQ3¹³, examining the use of financial instruments and reflecting the requirements of Article 139(g) of Regulation (EU) 2021/2115. It should be noted that not all CSPs are using financial instruments and therefore this is only relevant for 13 CSPs (see Analysis and synthesis of the evaluation themes, [Section 2.1.3](#)). Nevertheless, for all the CSPs using financial instruments, the *ex ante* evaluation reports attempted to assess the evidence justifying the use of financial instruments provided in the SWOT, the assessment of needs and the context indicators related to the socio-economic status of potential beneficiaries.

10 SQ1: To what extent is the context and SWOT analysis based on recent evidence and does it take into account experiences gained from implementing the CAP in previous programmes?

11 SQ2: To what extent are the needs well defined, prioritized and based on evidence from the context and SWOT analysis?

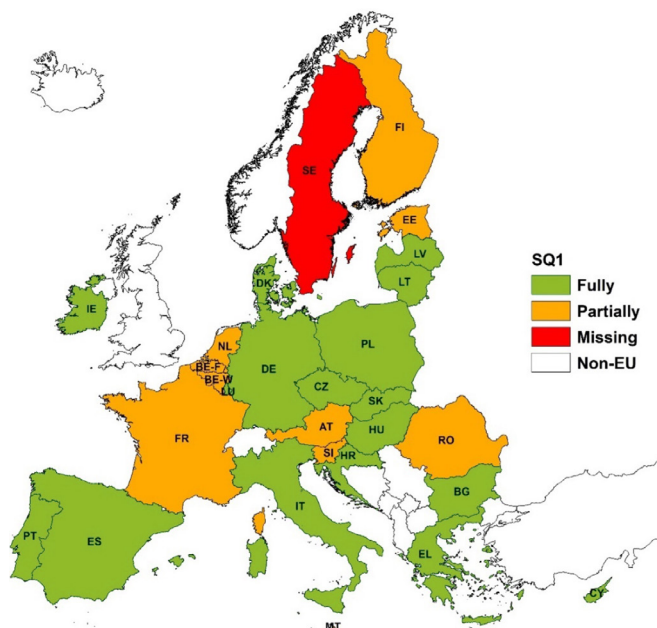
12 SQ4: To what extent do the designed interventions respond to the identified national and regional needs?

13 SQ3: To what extent is the use of financial instruments financed by the EAFRD justified?



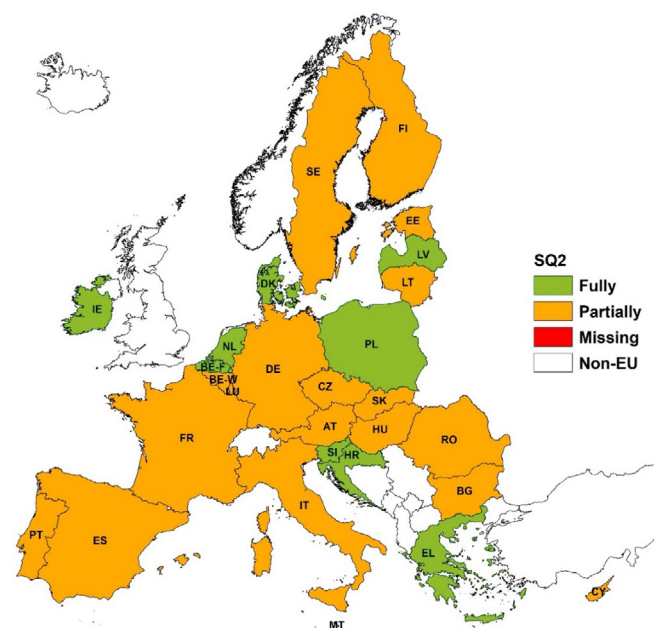
Article 139 (a) The contribution of the CAP Strategic Plan to achieving the SOs set out in Article 6(1) and (2), taking into account national and regional needs and potential for development as well as lessons drawn from the implementation of the CAP in previous programming periods; **Article 139 (g)** Where relevant, the rationale for the use of financial instruments financed by the EAFRD

Map 12. The extent to which *ex ante* evaluations fulfil JC for requirements of Article 139 (a) relating to the context and SWOT analysis (SQ1)



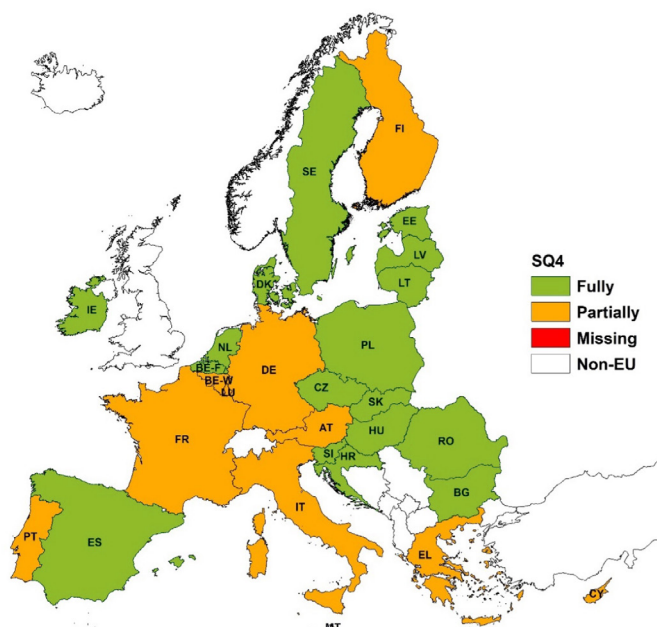
Source: European Evaluation Helpdesk for the CAP (2023)

Map 13. The extent to which *ex ante* evaluations fulfil JC for requirements of Article 139 (a) relating to the needs assessment (SQ2)



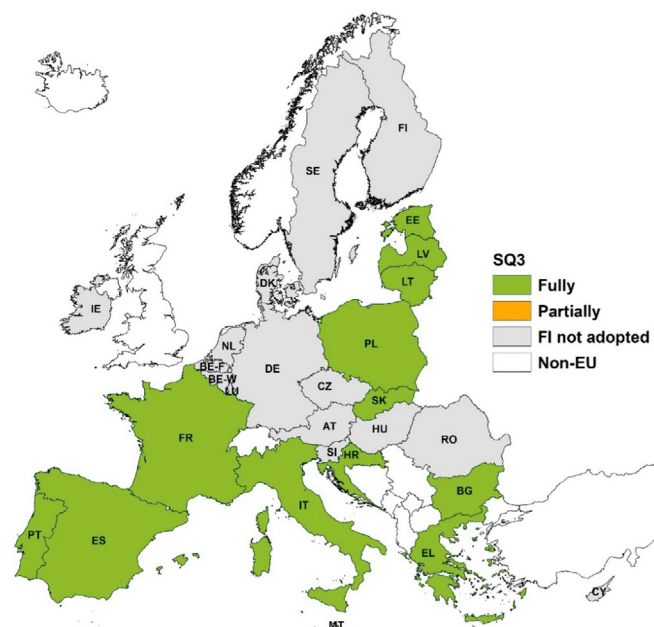
Source: European Evaluation Helpdesk for the CAP (2023)

Map 14. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (a) relating to designed interventions (SQ4)



Source: European Evaluation Helpdesk for the CAP (2023)

Map 15. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (g) relating to the use of financial instruments (SQ3)



Source: European Evaluation Helpdesk for the CAP (2023)



The following two maps show the extent to which the *ex ante* evaluations of each Member State and region addressed the requirements outlined in Article 139(b) of Regulation (EU) 2021/2115. [Map 16](#) shows that all *ex ante* evaluations attempted to assess the JC of SQ5¹⁴, and therefore evaluated the consistency, synergy and balance between interventions.

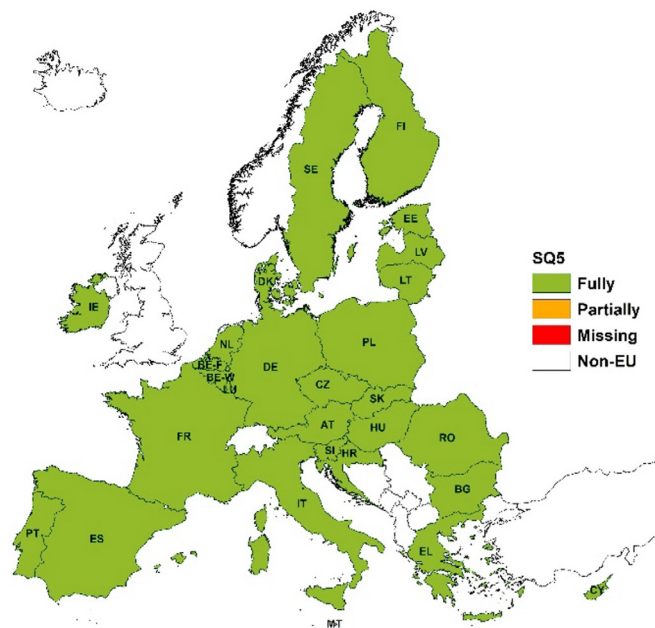
[Map 17](#) shows the extent to which *ex ante* evaluations attempted to assess the JC for SQ7¹⁵. Regarding external coherence, the *ex ante* evaluation was required to assess the following aspects:

- > the CSPs are complementary to the policies expressed through the legislative acts of Annex XIII of Regulation (EU) 2021/2115;
- > the CSPs' interventions are coherent with other relevant policies.

The majority of *ex ante* evaluations evaluated all JC, except for seven *ex ante* evaluations that assessed only one JC. This is the case for the *ex ante* evaluations of Wallonia (Belgium), Cyprus, Czechia, Greece, Finland, Luxembourg and Slovakia. These *ex ante* evaluations only evaluated the second JC.

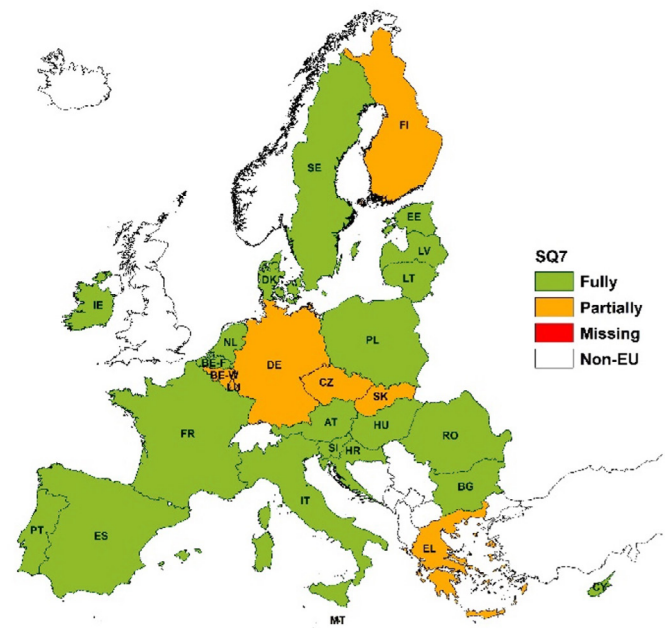
Article 139 (b) The internal coherence of the proposed CAP Strategic Plan and its relationship with other relevant instruments

Map 16. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (b) relating to the CSP interventions (SQ5)



Source: European Evaluation Helpdesk for the CAP (2023)

Map 17. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (b) relating to CSP coherence (SQ7)



Source: European Evaluation Helpdesk for the CAP (2023)

14 SQ5: To what extent are the CSP interventions, their eligibility conditions, definition and conditionality requirements consistent with each other and work in synergy to achieve the objectives coherently?

15 SQ7: To what extent are the CSPs coherent with other policies, including but not limited to EU policies, national and regional policies?



Map 18 shows the extent to which the *ex ante* evaluations assessed the JC of SQ6¹⁶ on requirements linked to Article 139(c) of Regulation (EU) 2021/2115, namely:

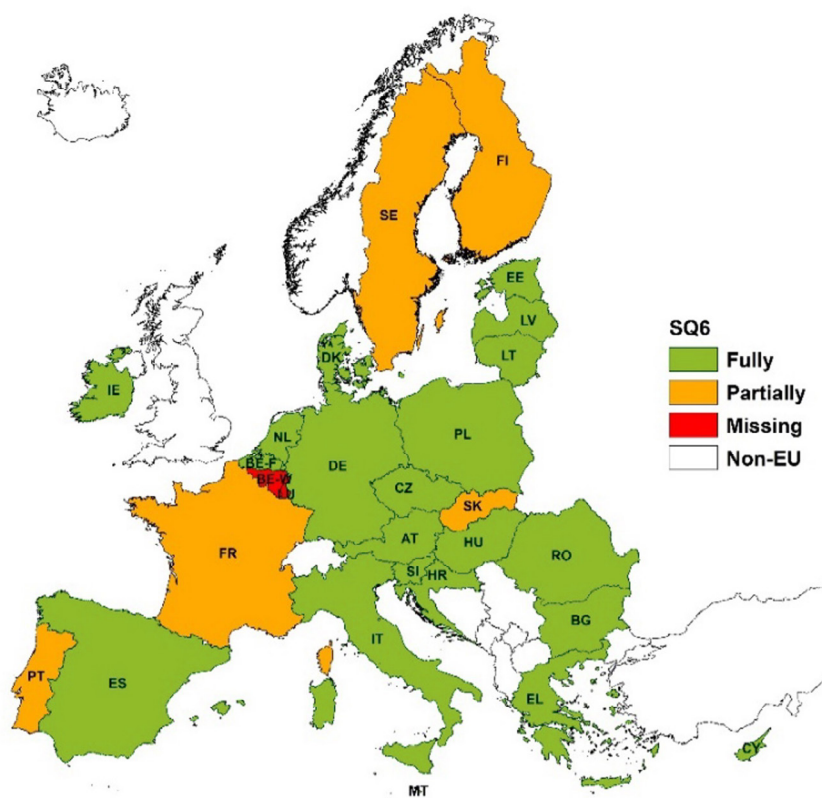
- > whether the allocation of budgetary resources for each intervention is justified by the assessment of needs;
- > whether the allocation of budgetary resources and the unit costs assigned to each intervention is consistent with the targets set in the CSP.

Nineteen *ex ante* evaluations assessed all JC. Five of the *ex ante* evaluations fulfil the JC partially. Finland and Sweden only addressed the first JC, justifying the allocation of budgetary resources for each intervention, whereas France, Portugal and Slovakia addressed

the second JC, providing information on the consistency between the targets set and the allocated budgetary resources and unit costs per intervention. In Luxembourg, the *ex ante* evaluation of the budget was based on partial working documents. Luxembourgish evaluators mentioned that the *ex ante* evaluation was conducted on the first draft of the CSP, and the contract did not cover subsequent revisions. In addition, there was a year's time difference between the first draft of the CSP and the final version submitted to the EC. In Wallonia (Belgium), ahead of the *ex ante* evaluation, the MA authority commissioned the University of Liege to assess various budget scenarios on which the final CSP budget was based. This study also reflected the consistency between the unit cost and the targets.

Article 139 (c) The consistency of the allocation of budgetary resources with those SOs set out in Article 6(1) and (2) that are addressed by the CAP Strategic Plan

Map 18. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (c) concerning the allocated budgetary resources (SQ6)



Source: European Evaluation Helpdesk for the CAP (2023)

16 SQ6: To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs?



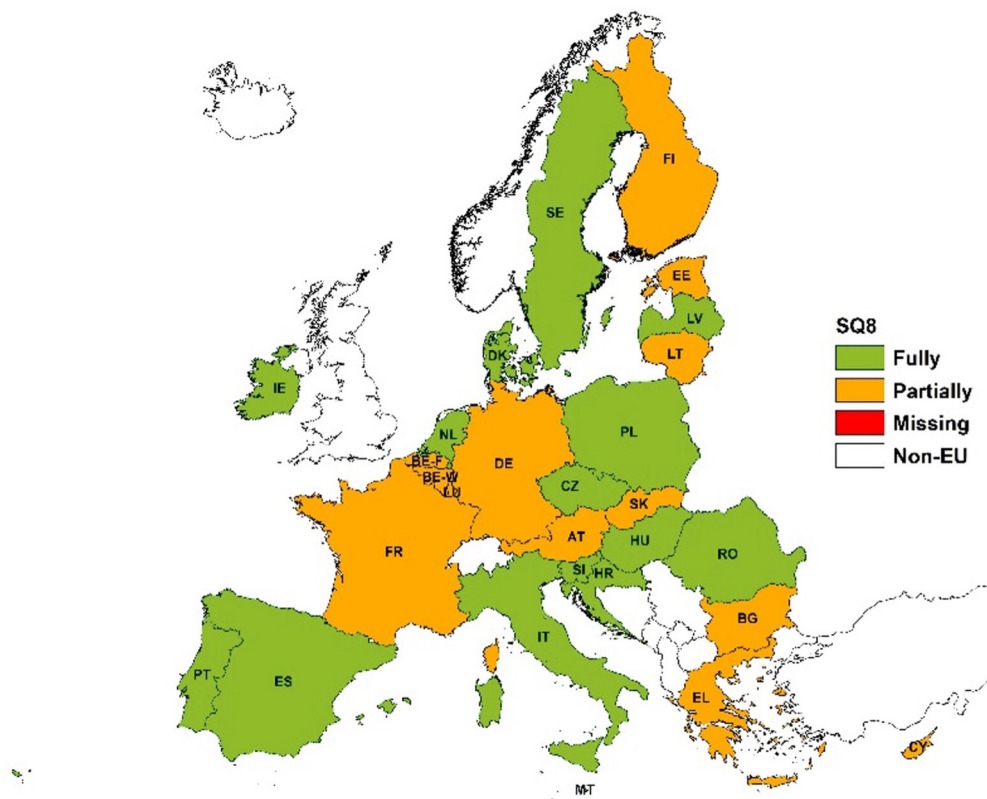
Map 19 below, shows the extent to which the *ex ante* evaluations sought to assess the JC of SQ8¹⁷ on requirements linked to Article 139 (d) and (e) of Regulation (EU) 2021/2115, namely:

- > whether each intervention is clearly linked to one or more result indicators;
- > whether the assumptions to estimate the output values and the result targets are clearly outlined and validated;
- > whether the milestones are based on the designed interventions, linked to the corresponding result indicators and differences in annual milestone values are clearly explained.

Only 15 *ex ante* evaluations fully evaluated all JC linked to the requirements set out in Article 139(d) and (e) of Regulation (EU) 2021/2115 (d) and (e) of Regulation (EU) 2021/2115. Thirteen *ex ante* evaluations partially assessed the JC. For instance, all *ex ante* evaluations except in Slovakia fulfil the first two JC, where no information on this topic was found. The third element was not evaluated in 12 *ex ante* evaluations (AT, BE-FL, BE-WL, BG, CY, DE, EE, EL, FR, FI, LT, LU).

Article 139 (d) How the expected outputs will contribute to results; **Article 139 (e)** Whether the quantified target values for results and milestones are appropriate and realistic, having regard to the support envisaged from the EAGF and EAFRD

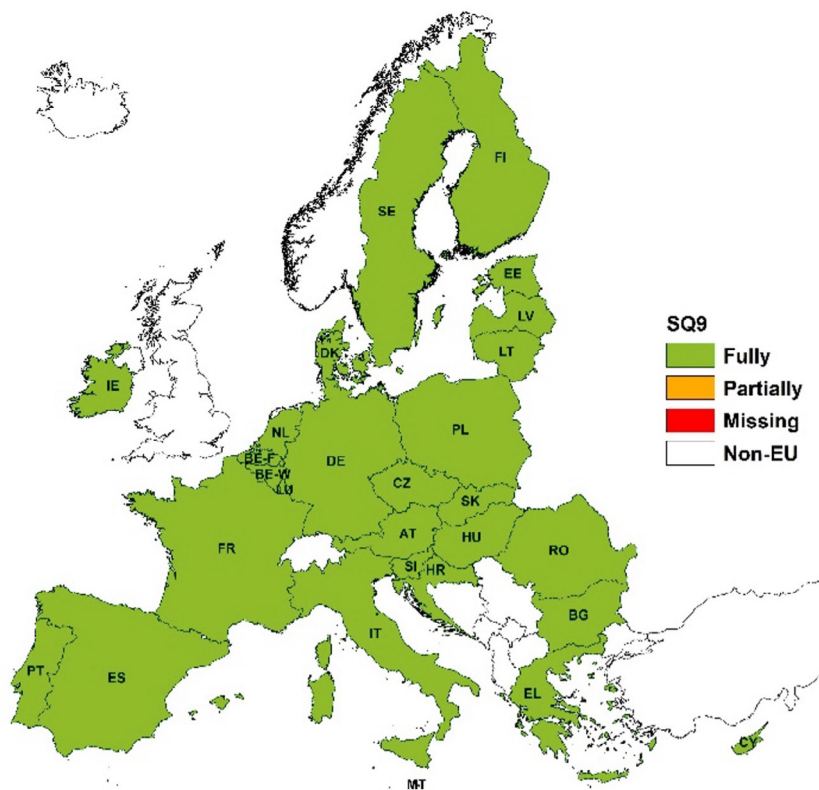
Map 19. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (d) and (e) with regards to expected outputs and realistic quantified targets and milestones (SQ8)



Map 20 below, shows that all *ex ante* evaluations evaluated the JC of SQ9¹⁸ regarding the requirements of Article 139(f) of Regulation (EU) 2021/2115 on supporting the simplification of the CSPs through the design of the CSP and the interventions included within it.

Article 139 (f) Measures planned to reduce the administrative burden on farmers and other beneficiaries

Map 20. The extent to which *ex ante* evaluations fulfil the JC for requirements of Article 139 (f) concerning measures for reducing administrative burden (SQ9)



Source: European Evaluation Helpdesk for the CAP (2023)

3.1.2 To what extent are the *ex ante* reports comprehensive and coherent?

3.1.2.1 Key findings

- › The majority of *ex ante* evaluations (21) followed the evaluation toolkit even though this was not a mandatory requirement.
- › All 28 *ex ante* evaluations used varied methodologies, with most including an overview of the evaluation framework and process while a few outlined methodologies for each specific evaluation phase.
- › Nearly all *ex ante* evaluations addressed requirements not linked to Article 139 of Regulation (EU) 2021/2115 to at least some extent.
- › For the assessment of context and needs, the majority of *ex ante* evaluations (excluding BE-WL, FI, RO, SE) provided information on whether the SWOT analyses were grounded in up-to-date evidence, incorporating statistical sources, previous studies, etc.
- › Internal coherence was assessed in all *ex ante* evaluations but two (AT, BE-WL). Evaluating external coherence was challenging due to early draft versions of the CSPs in some cases, including Wallonia (Belgium), Czechia, Finland, Germany and Luxembourg.

18 SQ9: To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries?



3.1.2.2 Analysis

To be able to assess the extent to which the *ex ante* evaluation reports are comprehensive and coherent, the EH looked at several assessment criteria, namely:

- > The evaluation framework was developed in line with the EH *ex ante* toolkit¹⁹ (Tools 2.1, 2.2, 3.1, etc.) or referred to robust evaluation methodologies.
- > The methodology used for the *ex ante* evaluation (admin burden, prioritisation of needs, etc.) is well detailed.
- > The *ex ante* evaluation goes further than the CSP's LRs. For example, it takes the opportunity to incorporate all the recent external shifts and trends that have affected the agricultural sector (e.g. market disruptions due to the war in Ukraine).

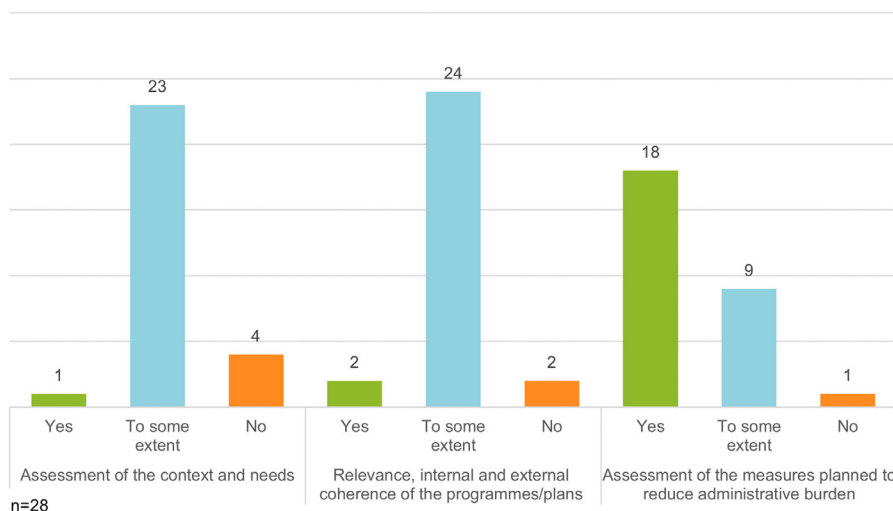
Although the use of the EH toolkit for *ex ante* evaluations was not a requirement, 21 *ex ante* evaluation reports mentioned that they followed the toolkit or considered it during the exercise. The remaining seven reports did not specifically mention it (AT, DK, EE, EL, IE, LV, RO). Ten evaluators who participated in the focus group discussions indicated that they used the toolkit at different stages. For instance, Italian evaluators found the toolkit to be comprehensive and flexible. Evaluators from Cyprus mentioned that the toolkit was very useful for the SWOT and needs assessment, yet for other elements, it did not prove as useful. This was because the toolkit was prepared before the approval of the CSP regulation.

Similarly, the Polish evaluator stated that the toolkit was useful for the environmental assessment but less so for the economic aspects.

In terms of the extent to which the methodology used for the *ex ante* evaluation was well detailed, it was found that all 28 *ex ante* evaluations included sufficient information to make an assessment. When analysing the methodologies, a variety of structures and methods were presented. In most cases, the methodology section in the *ex ante* evaluation provided an overview of the evaluation framework and the process and steps taken. In a few cases, the methodology was set out for each phase of the evaluation, namely SWOT and needs assessment, intervention logic, coherence and monitoring. This was the case for five *ex ante* evaluations, namely Estonia, Greece, Lithuania, Portugal and Romania.

Over half of the *ex ante* evaluations went beyond the requirements set out in Article 139 of Regulation (EU) 2021/2115 to some extent, with four of them (DK, HU, LT, PL) assessing further aspects to a significant extent. For instance, in Hungary evaluators were asked to assess 19 evaluations themes relevant to the Hungarian context. Yet, for instance, Wallonia (Belgium), focused mostly on fulfilling the requirements linked to Article 139 of Regulation (EU) 2021/2115. During the focus group, evaluators were asked whether any of the evaluations looked into the potential impact of the CSP. Most of them indicated that this was not part of their mandate (see [Annex 5](#)).

Figure 20. Addressing requirements not linked to Article 139 of Regulation (EU) 2021/2115, by evaluation theme



Source: European Evaluation Helpdesk for the CAP (2023)

Figure 20 shows that nearly all *ex ante* evaluations included information on requirements not linked to Article 139 of Regulation (EU) 2021/2115, at least to some extent. When it comes to the assessment of the context and needs, all *ex ante* evaluations but four (BE-WL, FI, RO, SE,) included information on whether the SWOT analyses were based on solid and recent evidence taking into account statistical sources, previous studies and whether it identified data gaps, etc.

In terms of relevance, internal and external coherence was assessed beyond what was required under Article 139 of Regulation (EU) 2021/2115, in all *ex ante* evaluations except for two (AT, BE-WL). Concerning this topic, *ex ante* evaluations looked at the extent to which CSP interventions were consistent with GAEC standards and definitions, proposed budget transfers and how the potential negative trade-offs between the CSP and other relevant policies were addressed, where applicable, as well as referring to lessons learned. Assessing the external coherence of the CSPs proved to

19 https://ec.europa.eu/enrd/preparing-ex-ante-evaluation-nutshell_en.html



be a difficult process since the versions of the CSPs that evaluators received were early drafts. This was the case for Wallonia (Belgium), Czechia, Finland, Luxembourg and Germany (see Analysis and Synthesis of evaluation themes, [Section 2.2.4](#)).

Through the assessment of measures planned to reduce the administrative burden, all *ex ante* evaluation reports (except SE) included information that went beyond the requirements linked to Article 139 of Regulation (EU) 2021/2115. For example, these reports presented to some extent, information on the simplification and reduction of administrative burden through digital application systems, simplification of IACs and non-IACs control procedures,

and other solutions to reduce burdens on beneficiaries. For instance, 24 *ex ante* evaluations presented information on the simplification of IACS application and control procedures. The remaining four *ex ante* evaluations did not refer to this issue (CY, EE, HU, SE). Similarly, 20 *ex ante* reports evaluated simplification in non-IACS application processes as well as other solutions to reduce administrative burden. The remaining eight *ex ante* evaluations did not refer to these issues (BE-FL, BE-WL, CY, CZ, LU, LV, PT, SE). No further explanations were given as to why the information was missing (see Analysis and Synthesis of the evaluation themes, [Section 2.4.1](#)).

3.1.3 To what extent is the *ex ante* evaluation specific and considers the specific requirements for certain objectives?

3.1.3.1 Key findings

- › National and regional specificities were considered and reflected in the analysis of *ex ante* evaluation reports in all but three (BE-WL, EE, SE).
- › *Ex ante* evaluations showed differences in terms of the level of detail provided in addressing specific environmental and climate requirements related to Annex XIII of Regulation (EU) 2021/2115.
- › Only 15 *ex ante* evaluations assessed the needs addressed in national environmental and climate plans listed in Annex XIII of Regulation (EU) 2021/2115, while the remaining reports focused less on this aspect.
- › The majority of *ex ante* evaluations presented key sectoral aspects in their SWOT analyses, except for Wallonia (Belgium) and Estonia.
- › Half of the reports lacked information on the analysis of issues related to agricultural income, specifically the fairer distribution of direct payments and risk management. However, although the *ex ante* evaluations lacked explicit mention of a fairer distribution of direct payments or risk management, these aspects were covered in the CSPs.

3.1.3.2 Analysis

To be able to assess the extent to which the *ex ante* evaluation reports are specific and consider the specific requirements for certain objectives, the EH relied on several assessment criteria as follows:

- › National and regional specificities have been considered and reflected in the analysis;
- › The specific requirements related to Annex XIII of Regulation (EU) 2021/2115 have been addressed;
- › Key sectoral aspects have been analysed where relevant;
- › The *ex ante* evaluation contained an analysis of issues related to agricultural income.

In all but three *ex ante* evaluations (BE-WL, EE, SE) information on national and regional specificities was considered and reflected in the analysis. For instance, the *ex ante* evaluation for Wallonia (Belgium) did not cover this aspect since the CSP is already designed at the regional level. The Estonian *ex ante* evaluation did not contain any reference to specific regional or sectoral aspects in the CSP. The Swedish *ex ante* evaluation, as already mentioned under the first Sub-AQ, did not provide detailed information on the context and SWOT analyses, as these were performed by the MA in a separate study that was not publicly available. Therefore, the evaluator could not identify details on national and regional specificities. Among the other *ex ante* evaluations, evaluators considered specific and detailed conditions, addressing geographical areas and territories. For example, evaluators of the Spanish CSP mentioned that a

territorial criterion was used across the 17 Autonomous Regions for the prioritisation of needs. Furthermore, the discussions in the focus group indicated that, for example, the Italian ministry carried out discussions with regional entities and the evaluators checked whether the SWOT and needs assessment reflected the regional needs. Furthermore, Italian evaluators also verified that the regional elements were adequately reported and explained within the interventions.

When it comes to specific requirements related to Annex XIII of Regulation (EU) 2021/2115, *ex ante* evaluations exhibit differences between those that covered only those requirements linked to Article 139 and those that looked also at additional elements. For instance, nearly all *ex ante* evaluations (23) presented information on the extent to which CSPs were complementary to the policies expressed through the environmental and climate legislative acts of Annex XIII of Regulation (EU) 2021/2115. Only five *ex ante* reports did not include information on this aspect. This is the case for Wallonia (Belgium), Czechia, Germany, Finland and Luxembourg where evaluators indicated that there was no information in the CSP regarding this aspect. According to evaluators, one of the reasons for this was linked to the fact that the CSPs were still in the early drafting stages during the evaluation. Yet, for instance, in Wallonia (Belgium) the evaluator indicated that the CSP's interventions did not contribute to Annex XIII of Regulation (EU) 2021/2115 policies but did demonstrate the contribution made by interventions to the Green Deal, Farm to Fork Strategy and the Biodiversity Strategy.



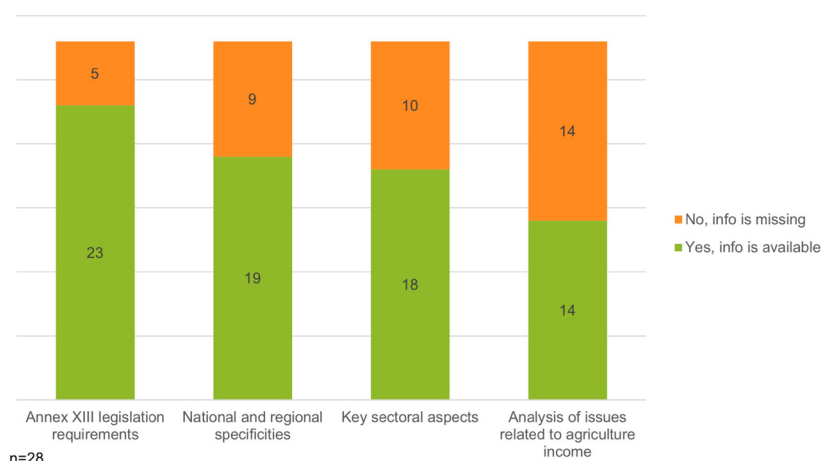
On the other hand, only 15 *ex ante* evaluations (BE-FL, BG, CY, DK, EL, ES, FR, HR, HU, IE, LT, MT, NL, PL, PT) indicated that the assessment of needs addressed the national environmental and climate plans emanating from the legislative acts listed in Annex XIII of Regulation (EU) 2021/2115. This element is not a requirement linked to Article 139 of Regulation (EU) 2021/2115, and as such fewer *ex ante* evaluations assessed this aspect. Nonetheless, discussions during the focus group revealed that in some instances evaluators were specifically asked to verify Annex XIII of Regulation (EU) 2021/2115 (SE) or to carry out an assessment of the environmental obligations of Annex XIII (DE).

In all but three *ex ante* evaluations (BE-WL, EE, SE) the SWOT analyses presented key sectoral aspects (see Analysis and Synthesis of evaluation themes, [Section 2.1.1](#)). For Wallonia (Belgium) and Estonia, the *ex ante* evaluations did not refer to key sectoral aspects in the same way as they did not mention national or regional specificities. In the case of Sweden, the SWOT analysis and evaluation were conducted by the MA and therefore this aspect was not part of the *ex ante* evaluation exercise. Ten *ex ante* evaluations (AT, BE-WL, CY, DE, EL, FI, FR, IT, MT, PT) did not report whether the lessons learned from addressing national/regional needs through previous interventions under Pillar I and Pillar II, their eligibility conditions and definitions, had been considered when designing the intervention strategy

and whether these were documented or referenced in the CSP (see Analysis and synthesis of the evaluation themes, [Section 2.2.1](#)). Some evaluators mentioned that the missing information might become available at a later stage. Nonetheless, the EH consulted the CSPs to determine the extent to which information was not available for the *ex ante* evaluations. In several instances (AT, FR, IT, EL, PT) information on lessons learned was found in the CSPs showing how it had contributed to the improvement or strengthening of interventions in specific sectors (e.g. the agri-food sector in Greece, the forestry sector in Germany, etc.) – see Analysis and synthesis of the evaluation themes, [Section 2.2.1](#).

Half of the reports are missing information regarding the analysis of issues related to agricultural income. These 14 *ex ante* evaluations (BE-WL, CZ, ES, FI, FR, HU, IT, LT, LU, MT, PT, RO, SE, SK) did not include information regarding the fairer distribution of direct payments or risk management. The EH used the 'Mapping and Analysis of CAP Strategic Plans 2023-2027' to determine whether this omission was due to the issue not being considered in the CSP or being overlooked by the evaluators. The study revealed that the respective CSPs did address the issue under SO2. This indicates that although the evaluations lacked explicit mention of a fairer distribution of direct payments or risk management, these aspects were already covered in the CSPs.

Figure 21. Availability of information for specific requirements



Source: European Evaluation Helpdesk for the CAP (2023)

3.1.4 To what extent were the *ex ante* evaluations able to evaluate the contributions of the CSPs in achieving the SOs?

3.1.4.1 Key findings

- When a specific section was dedicated to assessing the CSP's contribution in achieving the SOs, the analysis was more comprehensive than when information on the contribution was scattered across various sections.
- Unless specifically requested, evaluators rarely commented on the CSPs contribution in terms of potential impact, as the CSPs did not include target values for the impact indicators. As such, the result indicators could not be used to determine potential impact. Conclusions regarding the CSPs contribution in terms of potential impact were considered difficult to substantiate due to a lack of evidence.
- Evaluators suggested potential methodologies, such as quantitative analysis and the ToC, to assess possible impacts. However, there were concerns about the availability of required data for such assessments and the lack of links with impact indicators.
- Evaluation of the unit amount per intervention was overlooked in many *ex ante* reports. The evaluation mainly relied on lessons learned from the previous programming period without a clear explanation of how this experience was used.
- Only a limited number of *ex ante* reports identified specific risks or factors that could influence the achievement of the targets and SOs. The extent to which well-defined causal links were identified between needs, interventions and result indicators was often proportional to the amount of information provided to evaluators.



3.1.4.2 Analysis

To assess the extent to which the *ex ante* evaluation reports were able to evaluate the contributions of the CSP in achieving the SOs, a two-step approach was taken. First, the *ex ante* evaluations were screened for the specific section dedicated to CSP contributions to SOs. Second, a mapping of the relevant SQs was carried out to understand whether the *ex ante* reports provide information in this regard or not.

Fourteen *ex ante* reports (AT, CY, CZ, DE, ES, FI, FR, HR, LV, PT, RO, SE, SI, SK) included a specific section on the contribution of the CSP to achieving SOs. Four of them did not include any information on this aspect, and the remaining nine were unclear. One conclusion is that, from a practical point of view, when a specific section was dedicated to assessing the contribution, the analysis of it was more comprehensive.

There was no specific structure imposed on the evaluation reports, however, all *ex ante* evaluation reports had to assess the contribution of the CSPs to the SOs, as required by Article 139 (a) of Regulation (EU) 2021/2115. Assessing contributions can be done in various ways and largely depends on the intervention logic and the new PMEF. As mentioned by the evaluators during the focus group discussions, the current intervention logic links the needs to interventions, output and result indicators. However, the result indicators do not directly reflect any change or potential impact. Therefore, unless the MA specifically requested an impact assessment to be carried out, any conclusions made by evaluators regarding the potential impact of interventions linked to these result indicators were difficult to substantiate and therefore considered to be lacking in evidence. For this reason, evaluators rarely commented on potential impact (see Analysis and synthesis of the evaluation themes, [Section 2.5.1](#)). Only nine *ex ante* evaluation reports indicated the potential contribution (or absence) of the CSP towards the impact indicators (CY, DK, HR, HU, LT, LV, PT, RO, SK). Some *ex ante* reports conducted an expert assessment based on impact indicators (HU, LT, RO), others based on context indicators (CY), or based on budget allocation (HR).

Several suggestions were mentioned regarding potential methodologies to assess possible impacts, such as quantitative analysis. However, the evaluators also highlighted the potential lack of data available for such an exercise. Others mentioned the use of the ToC (LT, SE), which involves outlining the causal pathway from needs to impact indicators. In the summary of the *ex ante* evaluation report in Annex I of the CSP, the Swedish evaluators state: "Therefore, it is important to have a clear ToC that describes the links enabling the agricultural sector and rural areas to achieve the overall objective through CAP support. In this context, there may also be reasons to emphasise the importance of further developing the risk analysis in the interventions." In this sense, the answers provided in SQ4²⁰ and SQ8²¹ constitute a first step in that direction. Evaluators often confirmed the presence of a causal link between the intervention logic and the SOs but noted that this could be further strengthened by incorporating more robust technical knowledge, clearly stating the potential impacts and defining eligibility conditions more precisely.

Another important aspect is the potential uptake of different interventions, where two factors play a significant role; the unit amount per intervention and the eligibility conditions that reflect the potential scope of the intervention (which, in turn, is reflected in the planned target for result indicators). Information on whether the *ex ante* report reflected the unit amount per intervention, in parallel with the overall financial envelope for the CAP intervention to achieve SOs, was found in 24 *ex ante* reports. Only four *ex ante* reports did not include any information on this (BE-WL, FI, LU, SE). However, while result indicators were comprehensively assessed by evaluators and commented on, the EH found that the evaluation of the unit amount was somewhat overlooked and mainly relied on lessons learned from the previous programming period without a clear explanation of how this previous experience was used. The new delivery mechanism and the accompanying introduction of new interventions, such as the eco-scheme, should have meant that further emphasis was placed on the potential uptake of farmers. One reason for this oversight could be, as mentioned by evaluators (FI, FR, ES, LU, NL), that information regarding financial allocations arrived late in the *ex ante* evaluation process and followed multiple updates not reflected in the documents provided to evaluators, thus hindering the thoroughness of the analysis.

Information on whether the *ex ante* reports identified the extent to which external factors/context indicators could influence the achievement of the targets and potentially influence the achievement of the SOs was found in 27 reports. However, these results need to be nuanced, as only nine *ex ante* evaluations confirmed that CSPs identified specific risks that may influence the attainment of milestones or internal and external factors that may determine the pace of fund absorption (DK, ES, HR, HU, LV, PL, PT, RO, SI). These findings show that the extent to which the causal links were well defined between needs, interventions and result indicators is often proportional to the amount of information made available to evaluators.

Additionally, most evaluators assessed the appropriateness of the budget at the intervention level and, based on their expert judgment, summarised the potential underestimation or overestimation of budgetary allocations at the SO level (AT, CY, DE, EE, FR, LV, SI). In this regard, evaluators pointed out potential mismatches between needs, planned targets for the result indicators and budget allocation. However, the conclusions regarding the contribution to the different SOs are rather weak. As mentioned by several evaluators (BG, HU), the current budget allocation is structured by funds (EAGF and EAFRD) and then by interventions rather than aligning with the needs and intervention strategies according to SO. Therefore, the lack of information on budget allocation per SO makes it difficult to fully interpret how the financial allocation will contribute to them. However, the evaluation for Wallonia (Belgium) estimated the budget breakdown at the GO-level, but did not provide a judgment on its appropriateness.

20 SQ4: To what extent do the designed interventions respond to the identified national and regional needs?

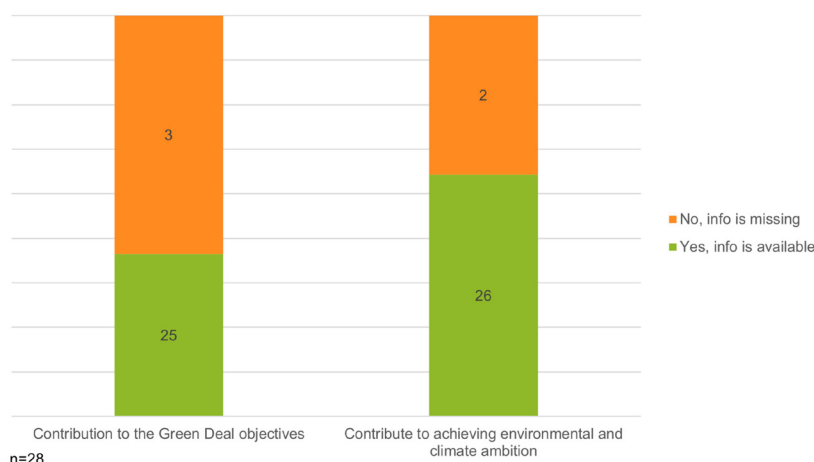
21 SQ8: To what extent will the expected outputs contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD?



Finally, all CSPs were required to provide an explanation and rationale for how the green architecture aimed to contribute to national Green Deal targets and how the CSPs contributed to achieving higher environmental and climate ambition compared to the previous programming period. In general, similar conclusions can be drawn for the assessment of the contribution to SOs. First, evaluators rarely assessed the potential impact on the related Farm to Fork targets unless they reflected agricultural management practices such as organic farming (see Analysis and synthesis of the evaluation themes, [Section 2.5.1](#)). Second, national values related to Farm to Fork targets were rarely set, and the choice of the national value seems to have been strongly determined by the pre-existing related national target set by other relevant national initiatives.

Finally, the contribution was often assessed in terms of relevant result indicators and/or through the use of conditionalities. In that regard, the SEA reports often make several recommendations. SEA recommendations are the ones that have led to the fewest changes in the CSPs. Nevertheless, as shown by [Figure 22](#), 25 *ex ante* reports included some information on how the CSPs were contributing to the Green Deal objectives, albeit in a qualitative manner. Only three of them did not provide any information on this aspect (CY, FI, PL). Twenty-six *ex ante* reports included some information on how the CSPs' architecture contributed to achieving greater environmental and climate ambition. Only two of them did not provide any information (CY, FI).

Figure 22. Availability of information regarding contributions of the CSP to the Green Deal objectives and to achieving higher environmental and climate ambition



Source: European Evaluation Helpdesk for the CAP (2023)

3.2 AQ2: To what extent was the *ex ante* evaluation carried out following an effective process?

In general, the process of carrying out the *ex ante* evaluation was undertaken in parallel to the development of the CSPs. Therefore, 27 *ex ante* evaluations adopted a multiphase approach although the structure and extent of analysis varied between Member States. This implies that the evaluators were provided with chapters of the CSP such as the SWOT and needs analysis for evaluation followed by the intervention logic, targets and milestones for an additional evaluation round. In some Member States, such as Austria and Finland, the *ex ante* evaluation was conducted over three phases. The *ex ante* evaluations were carried out by independent experts

(external evaluators) on sections of the CSPs provided by the national competent authority in charge of drafting the CSP (MA). In each case, the *ex ante* evaluation provided an independent view to inform the preparation of the CSP.

The complete *ex ante* evaluation report was submitted by the independent evaluator to the MA. A summary of the main results of the *ex ante* evaluation, together with a link to the complete *ex ante* evaluation and the SEA, was submitted to the Commission by the responsible MA together with the entire CSP (i.e. as Annex I of the CSP).



3.2.1 What was the process followed in conducting the *ex ante* evaluation?

3.2.1.1 Key findings

- Many Member States adopted a multiphase approach for the *ex ante* evaluation of the CSP, with evaluators assessing individual chapters of the CSP and providing recommendations on these before moving on to the next chapter. This approach led to the submission of several reports covering different phases of the CSP.
- In some Member States, the MA outsourced part of the *ex ante* evaluation tasks to different entities. Therefore, the *ex ante* evaluation reports do not reflect fully all *ex ante* evaluation activities that have been carried out on the demand of the MA.
- Evaluators noted that evaluating specific sections of the CSP in isolation could hinder the overall consistency and synergies between different sections. The evaluators emphasised the importance of considering the CSP in its entirety for a comprehensive assessment.
- There was a timing mismatch between the submission of *ex ante* evaluation reports and the approval of the CSPs. In many cases, the reports were submitted well before the final version of the CSP was approved, which meant that the *ex ante* evaluation did not consider the final submitted versions of the CSPs.
- Evaluators faced time constraints when evaluating the intervention strategy, financial plan and indicators, as these elements were often submitted at a later point in the process. In turn, this affected the level of detail in the *ex ante* evaluation reports.

3.2.1.2 Analysis

As outlined in the toolkit²² prepared for the *ex ante* evaluation report by the EH, the *ex ante* evaluation is strongly linked to the programming of the CSP and the SEA. This interlinkage could be organised in several possible ways e.g. by providing a joint *ex ante* and SEA feedback in an iterative exchange with the programming authority or by providing input to the draft CSP documents at pre-defined stages.

In the survey conducted with MAs, 27 authorities indicated that a multiphase approach was conducted (except DE), with evaluators assessing individual chapters of the CSP and providing recommendations before moving on to the next chapter of the CSP²³. This was also corroborated during focus group discussions. For some Member States, this multiphase process led to the submission of several reports covering the different phases of the CSP.

For instance, in Austria, the *ex ante* was conducted over three phases with the first one focusing on the 'Assessment of the SWOT analysis and the needs assessment' (phase 1, two evaluation rounds), the second on the 'Assessment of the intervention logic, targets and milestones of the CAP Strategic Plan' (phase 2, two evaluation rounds) and the final phase on the 'Assessment of the planned implementation modalities of the CAP Strategic Plan'. This led to the development of 20 papers and 20 workshops which were conducted as part of the *ex ante* evaluation. However, the submitted *ex ante* evaluation report accompanying the CSP only summarises these papers.

In Sweden, the adoption of a multiphase approach led to the submission of 10 reports covering the different phases of the CSP. It is interesting to note that during focus group discussions it was highlighted that in Sweden, Hungary and Lithuania, the SWOT and needs assessment of the CSP was outsourced by the relevant ministry with the *ex ante* evaluators providing feedback on the outsourced reports. In Wallonia (Belgium), the MA outsourced the assessment of the budget allocation to other experts.

The adoption of a multiphase approach was considered practical, given the tight timeframe for the adoption of the regulation, negotiations and discussions on the CSPs, despite being challenging. During focus group discussions, evaluators noted that

although the situation meant that specific sections of the CSP were provided for evaluation, it would have been beneficial for the CSP also to have been considered in its totality to assess the consistency and synergies between the different sections and to determine the extent to which recommendations were being addressed. On multiple occasions, the final version of the CSP was not submitted to the evaluators, as explained further below.

In several instances, the evaluation process was divided into three stages. However as pointed out in the summary of the *ex ante* evaluation report for Slovakia, "these stages were revised throughout the process due to the multiple fundamental changes to the SP's intervention strategy during the programming process and the missing parts of the SP".

Furthermore, in the absence of dedicated feedback structures, it was also difficult for evaluators to monitor the changes made to CSP. The reasons for these changes were: i) stemming from the *ex ante* evaluation recommendations, or ii) stemming from the changes made to Regulation (EU) 2021/2115 and from discussions carried out with the Commission on the draft CSPs. During the focus group discussions, most evaluators confirmed that an iterative process with the drafters of the CSP was required to ensure an adequate and timely submission of the *ex ante* evaluation report.

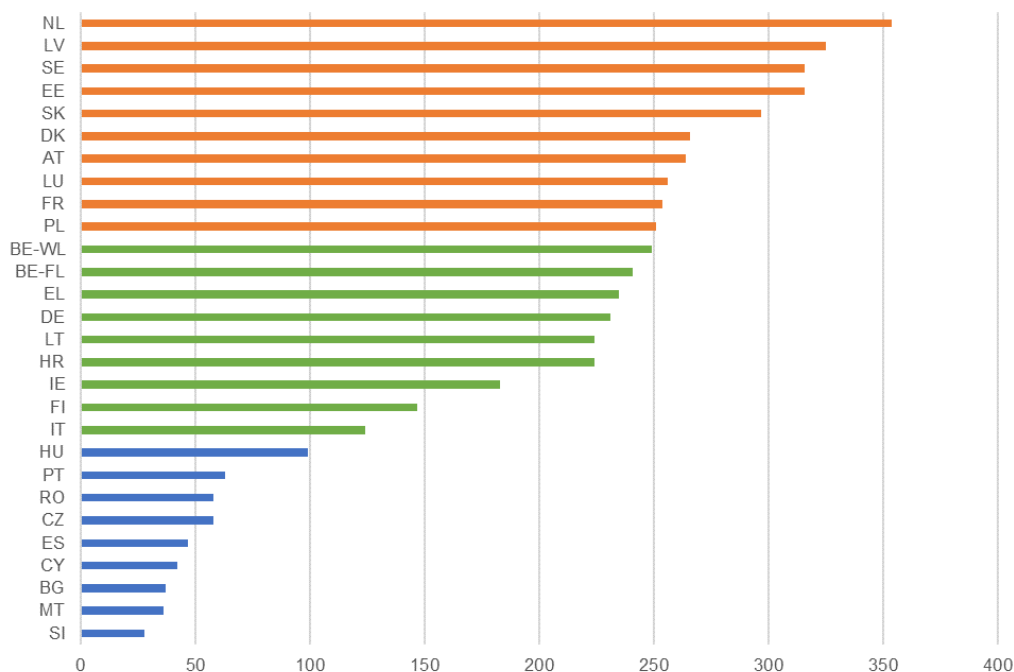
The mismatch in the timing between the submission of the *ex ante* and the date of approval of the CSPs is evident in [Annex 1](#) whereby for 10 CSPs (AT, BE-FL, DK, EE, FR, LU, LV, NL, SE, PL) the *ex ante* evaluation reports were submitted in 2021, with work on the CSP continuing through 2022 and with the programmes approved in the second half of 2022. For 65% of the CSPs (see [Figure 23](#)), the *ex ante* evaluation reports were submitted at least 200 days before the approval of the CSPs, clearly implying that the *ex ante* evaluation reports did not consider the final version of the CSP. Work also continued on the CSPs following the submission of the *ex ante* reports. Consequently, while this synthesis report provided a synthesis of the *ex ante* evaluation reports, these reports do not capture the content of the final submitted versions of the CSPs.

²² https://ec.europa.eu/enrd/sites/default/files/tool_1_2_tor_Ex_ante.pdf

²³ The MA survey provides sufficient representation with only one Member State not participating in the survey.



Figure 23. The difference in days between the *ex ante* report and approval of the CSP²⁴



Source: European Evaluation Helpdesk for the CAP (2023)

In general, evaluators provided feedback during each stage of the *ex ante* evaluation, in line with Article 139 of Regulation (EU) 2021/2115:

- SWOT analyses and needs assessment;
- internal coherence;
- consistency of the allocation of budgetary resources with SOs;
- expected outputs and contribution to results;
- assessment of quantified target values for results and milestones;
- measures planned to reduce the administrative burden; and
- the rationale for the use of financial instruments.

The evaluators participating in the focus group discussions indicated that, in general, sufficient time was spent on evaluating the SWOT and needs assessment but less time was spent on the interventions, financial plan and indicators, given that the latter elements were submitted at a later point in time. In certain instances, the evaluation of the financial plan and indicators had to be undertaken in a matter of weeks thus limiting the detail of the examination that it was feasible to carry out through the *ex ante* evaluation reports. This is consistent with the results from the targeted survey undertaken with MAs²⁵ whereby some MAs indicated that while the time for the SWOT analysis was optimal, the evaluation of the intervention strategy, financial distribution and indicator plan was limited by the

complexity of simultaneous circumstances, such as uncertainty over the EU legal framework, legal deadlines and discussions with the Commission on the SP content and design. In the summary of the Swedish *ex ante* evaluation report, it was noted that: “Work on the SP has been dependent on negotiations within and between the EU institutions and also dependent on the availability of required policy documents. At the same time, national budgetary conditions were not ready until September 2021, which has had an impact on the ability to calculate target values. The *ex ante* evaluators have worked in parallel and had access to the available evidence, but the uncertainties regarding the fundamentals have had an overall impact on the process as a whole.”

The time taken for the adoption of the regulation and negotiations in effect led to a reduced amount of time available for conducting the evaluation. 40% of the participants in the MA survey only partially agreed that sufficient time was available for each step.

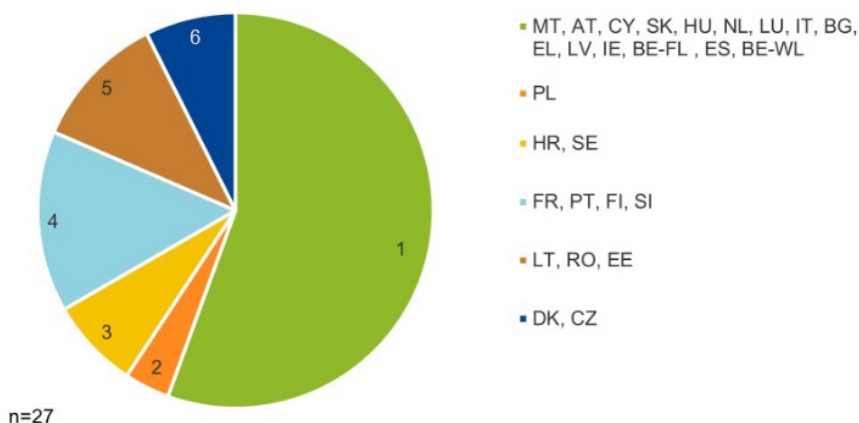
In most instances, the MAs were provided with only one version of the *ex ante* evaluation report, as can be seen from [Figure 24](#), while in about 33% of cases, more than four versions of the *ex ante* evaluation reports were provided implying that various discussions had to be undertaken to conduct the final *ex ante* evaluation report. It is also to be noted that in the latter cases, the *ex ante* evaluation reports were submitted well before the final version of the CSP was approved (EE, FI, FR, SI).

²⁴ Dates for the *ex ante* evaluation reports have been obtained directly from the *ex ante* evaluation reports submitted in SFC with the exception of ES whereby the date for the *ex ante* has been provided by the MA. In instance when the full date of the *ex ante* evaluation report was not provided but only the month was available, the first day of the month was considered to estimate the difference in the days between the *ex ante* evaluation report and CSP approval.

²⁵ 27 MAs responded to the survey.



Figure 24. Number of revisions to *ex ante* evaluation reports



Source: European Evaluation Helpdesk for the CAP (2023)

3.2.2 How did the *ex ante* evaluator interact with the MA?

3.2.2.1 Key findings

- > Dedicated communication structures were established between evaluators and MAs in about 80% of cases.
- > Regular meetings between evaluators and MAs intensified, with some conducted online due to COVID-19, and proved beneficial for collaboration.
- > Nearly 90% of MAs reported a positive relationship with *ex ante* evaluators.
- > The interaction between MAs and evaluators was particularly positive during the SWOT analysis and needs assessment phases.
- > Evaluators provided numerous recommendations throughout the process, with only a few featured in Annex I of the CSP.

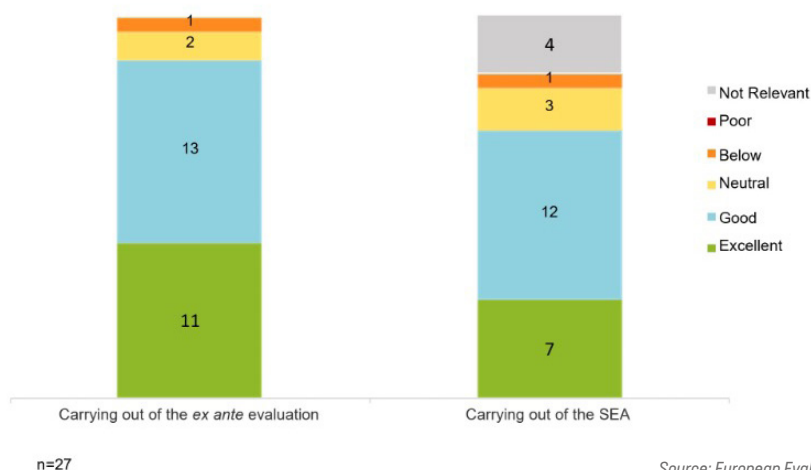
3.2.2.2 Analysis

Based on the survey conducted with MAs, almost 90% of the respondents referred to a positive relationship with the *ex ante* evaluators, and over 80% referred to a positive interaction with the team conducting the SEA (Figure 25). A positive interaction has been noted by the MAs with the evaluators across most phases of the *ex ante* evaluation, albeit more prominently in the SWOT and needs assessment. This may be because this was one of the phases in which sufficient time was available to evaluate the CSP, as outlined in both the survey and focus group discussions. Some

MA respondents referred to a neutral interaction with evaluators for the allocation of budgetary resources, internal and external coherence, as well as measures to reduce the administrative burden, see Figure 26.

Overall, the interaction between the MA and the evaluators contributed to a common understanding of the objectives of the *ex ante* evaluation, which also led to the development of recommendations and solutions for improving the design of the CSP.

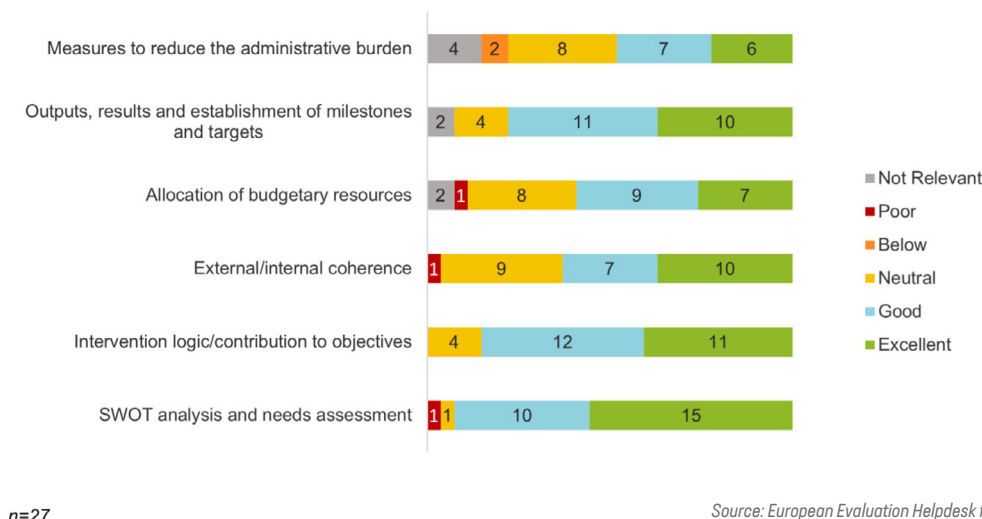
Figure 25. MA interaction with evaluators



Source: European Evaluation Helpdesk for the CAP (2023)



Figure 26. Interaction with evaluators across different sections of the *ex ante*



During the focus group discussions, evaluators also noted a positive interaction with the MAs. This was in part due to the establishment of regular meetings with the MA, the frequency of which intensified with the closure of the CSPs. Given the effect of COVID-19, several meetings were held online which was beneficial to some extent given that the availability of an online platform was useful when online workshops were conducted with stakeholders, such as the case in Austria.

During the focus group discussions, it was reiterated that evaluators provided numerous recommendations throughout the process with only a few featured in Annex I of the CSP. On the

other hand, the establishment of dedicated feedback structures proved beneficial and strengthened relationships. Cases in point are the establishment of a RAG (Red, Amber and Green) system in Germany for the prioritisation of evaluators' recommendations sent to the relevant ministry, with the MA providing feedback on each recommendation. This facilitated the process as the MA was able to prioritise the recommendations to be addressed.

Overall, the interaction between the MA and the evaluators contributed towards a common understanding of the objectives of the *ex ante* evaluation, which also led to the development of recommendations and solutions for improving the design of the CSP.

3.2.3 How were key stakeholders involved in the process of the *ex ante* evaluation?

3.2.3.1 Key findings

- > 62% of the *ex ante* evaluations have conducted consultations with stakeholders.
- > Consultations activities included workshops, survey and focus groups.
- > Most of the consultations' activities undertaken focused on the SWOT and needs assessment. In a few Member States, stakeholders were involved in all stages of the CSP design.

3.2.3.2 Analysis

As indicated in the MA survey, stakeholders²⁶ were involved in the *ex ante* process of 17 CSPs, ranging from discussions and workshops, as well as the development of surveys (see Figure 27). While the comprehensive involvement of stakeholders strengthened the partnership around the design of the CSP itself, the evaluators noted that the extensive stakeholder consultation undertaken at the level of the CSP, SEA and *ex ante* evaluation led to stakeholder fatigue.

While for some Member States, there was no formal stakeholder consultation, at the level of the *ex ante*, the evaluators participated in stakeholder discussions organised by relevant ministries.

The programming of the CSP, and the preparation of the *ex ante* evaluation and SEA, in particular, required the involvement of stakeholders, who provided important inputs and contributed towards the governance of the process.

For instance, in Malta, a stakeholder consultation was a requirement of the contract with evaluators conducting stakeholder consultation to ensure that the needs identified in the CSP remained valid, particularly since they were mainly drawn from the report 'Agricultural Policy for the Maltese Islands (2018-2028)'. This also led to an update on some of the needs, particularly given the challenges

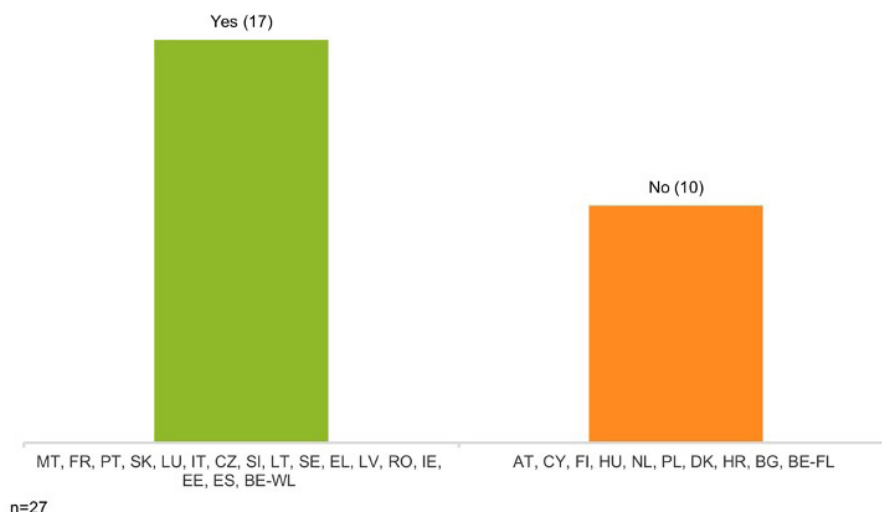
26 Stakeholders belong to one of the following five categories: farmers representatives, private sector, other competent authority, scientific community or other.



brought by COVID-19. In Italy, the consultation took the form of discussions with relevant ministries and authorities. In France, a survey was carried out by the *ex ante* evaluators among the actors involved in the preparation and future management of the CSP. It gathered the views of nearly 20 partners and contributors with the majority of respondents expressing their satisfaction with their involvement and the extent to which their opinions or proposals

were taken into account. Also, in Estonia, the *ex ante* evaluators conducted two online surveys, seven focus group discussions and one workshop as input for the evaluation. Some evaluators participating in the focus group discussion indicated that they did participate in a consultation exercise organised by the relevant ministry (DE, NL).

Figure 27. Involvement of stakeholders



As explained above, a stakeholder consultation was undertaken at different levels, as part of the drafting of the CSP, particularly the SWOT and needs assessment, as well as to contribute to the *ex ante* evaluation. During the focus group discussions, evaluators indicated that the extent of stakeholder consultation varied. In Luxembourg, stakeholder consultations were mainly undertaken for the SWOT, in Estonia, consultation was undertaken for all aspects of the CSP.

During the focus group discussions, it was noted that in some cases, stakeholders exhibited consultation fatigue as they were consulted during the design of the CSP, the *ex ante* evaluation and the SEA. It was also noted that, at times, stakeholder consultation, particularly during the drafting of the CSP led to conflicting interests between some of the stakeholders, making it difficult for those drafting the document to balance these interests.

In some of the *ex ante* evaluation reports, such as in Denmark, the evaluators explicitly noted that there was comprehensive involvement of stakeholders through the partnership around the design of the CSP itself. In Flanders (Belgium), it was noted that the SWOT and needs assessment process was designed very extensively with both a large-scale public consultation and targeted consultations with different stakeholders, stating: “More than before, both policy and sectoral actors were proactively involved to feed into the preparation of the new programme strategy.” Also, in the *ex ante* evaluation for the Italian CSP, it was noted that the involvement of all relevant stakeholders in the consultation activities that accompanied the different phases of preparation of the CSP was considered to be well documented, but suggested that the plan should indicate, at least in principle, how the CSP was to be communicated and visible to beneficiaries and the entities responsible for implementing it.

3.3 AQ3: To what extent did the lessons learned influence and shape the CSP?

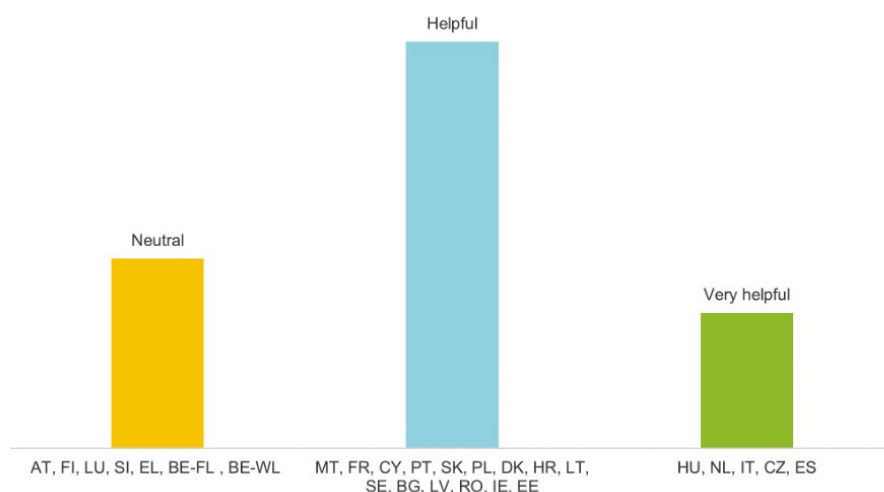
The *ex ante* evaluation reports and the SEA were useful in shaping the design of the CSPs. This is confirmed from the results of the survey conducted with MAs as well as through the analysis undertaken on the recommendations submitted in Annex I of the CSPs.

Based on the survey conducted with the MAs, the *ex ante* evaluation reports and the recommendations emanating from the reports

were useful in shaping the CSPs with 75% of the MAs (20 out of 27 respondents) indicating that the process ranged from ‘helpful’ to ‘very helpful’. None of the respondents indicated that the recommendations were not helpful in contributing to the design of the CSP (Figure 28).



Figure 28. MA survey responses on the extent to which recommendations from the *ex ante* were useful for the design of the CSP



Source: European Evaluation Helpdesk for the CAP (2023)

Annex I of the CSPs provides a good basis to determine the extent to which the recommendations made by the *ex ante* evaluators led to modifications of the CSP and, consequently, contributed towards the design of the CSPs. However, a word of caution is warranted as the recommendations presented in Annex I of the CSP refer to the final set of recommendations of the *ex ante* evaluations and may not take into account the numerous recommendations provided by the *ex ante* evaluators at each step of drafting the CSP. For instance, during the focus group discussions, the Swedish evaluators indicated that between 600 and 700 recommendations were provided throughout the evaluation process. Therefore, the final set of recommendations provided in Annex I only reflects a small proportion of the entire set of recommendations.

Furthermore, while most CSPs provided a detailed overview of these recommendations in Annex I, there are instances, such as

in Germany, where the recommendations were presented in the *ex ante* evaluation report itself (and often scattered across the report), but a full list of recommendations was not provided in Annex I. Also, the *ex ante* evaluation report for Flanders (Belgium) presented conclusions and recommendations which were not included in Annex I of the CSP.

As indicated in the [methodological approach](#) section of the report, several indicators have been derived from Annex I to provide a systematic approach to measure and track the implementation and impact of recommendations, particularly in shaping the CSPs. These indicators distinguish between recommendations that led to an update of the CSP and those that have not. The recommendations were also broken down by the different sections of the *ex ante* evaluation and SEA reports as well as by groups of SOs²⁷.

3.3.1 To what extent did the *ex ante* evaluation have a positive and constructive role in identifying contradictions, deficiencies, gaps, missing obligations, etc.?

3.3.1.1 Key findings

- The *ex ante* evaluation reports and the SEA were useful in shaping the design of the CSPs. In total, 18 of the *ex ante* evaluators referred to data gaps that restricted the completeness and comprehensiveness of the SWOT analyses.
- Inconsistencies were also noted mainly in terms of needs not linked to SWOT elements or the absence of a clear justification provided for the needs. This was also reflected in the recommendations from Annex I, where the recommendations focused on the misclassification of individual elements of the SWOT (e.g. strength misclassified as opportunity) and the lack of clarity of specific needs, which eventually served as the basis for developing the intervention logic.
- In some instances, a clear methodology of the prioritisation process was also not identified.
- The target values presented in the CSP are linked to output and result indicators with no established connection to the impact indicators.
- The absence of identification and linkage to impact indicators creates a gap in the intervention logic. This makes assessing contribution in terms of potential impact challenging, especially given the constraints in time and resources. The MAs addressed most of these recommendations, resulting in the positive correction of contradictions or deficiencies of the CSPs and hence contributed towards a better design of the CSP.

27 S01-S03 (economic), S04-S06 (environmental), S07-S09 (societal), multiple (two or more of the latter categories).



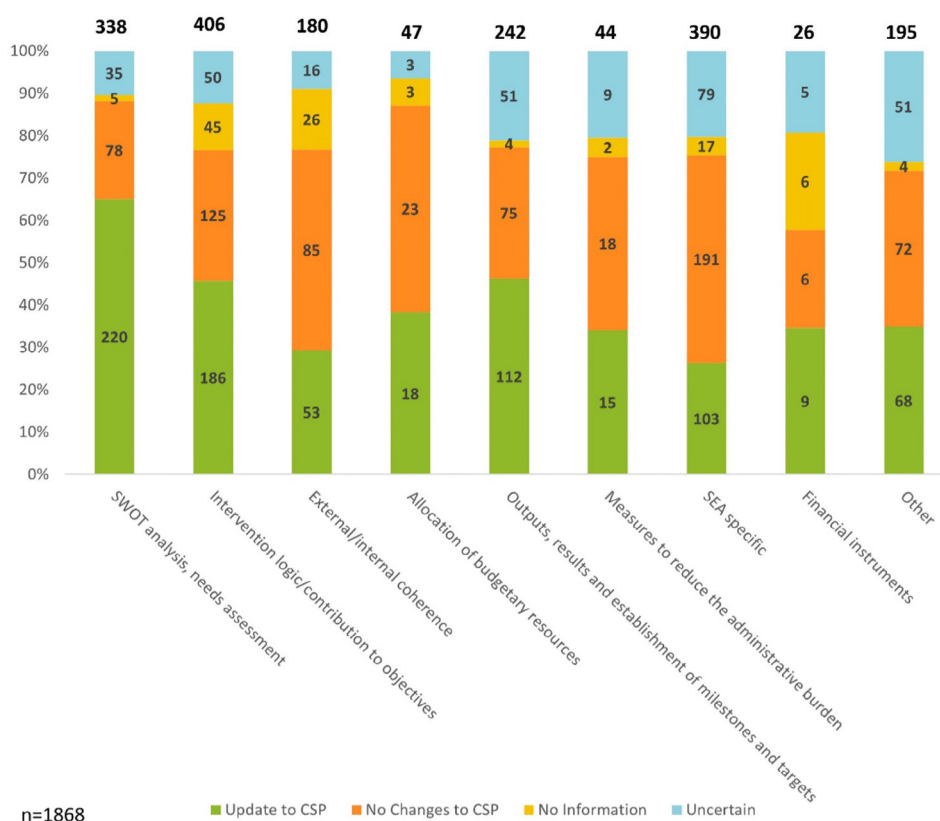
3.3.1.2 Analysis

This section draws on the analysis undertaken at the level of the SQs and Annex I recommendations to determine the extent to which the *ex ante* evaluation reports identified contradictions, deficiencies, gaps and missing obligations leading to an overall better design of the CSP.

Overall, most of the recommendations presented in Annex I focused on the intervention logic and SEA followed by the SWOT

and needs analysis (Figure 29). Recommendations addressing the SWOT and needs assessment accounted for 18% of the total recommendations, of which almost 65% led to an update of the CSP. This was mainly because the recommendations focused on identifying contradictions and deficiencies between the SWOT and needs analysis, which were taken on board by the MAs and addressed in the CSP.

Figure 29. Recommendations categorised by sections of the *ex ante*/SEA



Source: European Evaluation Helpdesk for the CAP (2023)

As outlined in the [analysis and synthesis of the evaluation themes](#) section of this report, in 18 CSPs, *ex ante* evaluators referred to data gaps that restricted the completeness and comprehensiveness of particular issues within the context and SWOT analyses. The *ex ante* evaluators also claimed that a limited number of needs appeared to be linked to SWOT elements without a clear justification (HU, IT, LU, PL, SE, SI, SK). Also, in five *ex ante* evaluations, the prioritisation process and the methodology were not clearly defined (BE-FL, CY, DE, NL, RO), leading to revisions in some cases.

This is also reflected in the recommendations presented in Annex I, where the recommendations focused on the misclassification of SWOT individual elements (e.g. strength misclassified as opportunity) and the lack of clarity of specific needs, which eventually served as the basis for developing the intervention logic. The recommendations also included clarity on the methodology adopted to prioritise needs as well as the traceability of needs throughout the CSP. A frequently encountered recommendation concerned the use of missing or outdated values for context

indicators and the need to utilise updated data from IACS or recent evaluations to address such gaps (DK, DE, EE, LV, PL, PT, SI). The MAs addressed most of these recommendations, resulting in corrections made to the contradictions or deficiencies in the CSPs.

Further analysis of the recommendations indicated that 22% of the recommendations related to the intervention logic, and about half of these recommendations led to an update of the CSP. In general, most of the recommendations called for clarity and coherence between objectives, interventions and needs. In fact, in several instances, the evaluators recommended correcting inconsistencies and clarifying the link between the needs and interventions. In the *ex ante* evaluation for the German CSP, a recommendation was made to include the secondary effects of interventions in the intervention strategy (presented in the *ex ante* but not in Annex I). Furthermore, it highlighted that while connecting each intervention to one result indicator reduces the burden of collecting result indicators for performance reporting, it underestimates the CSP's potential performance by overlooking potential synergies.



Several gaps were also identified concerning the output and result indicators and the establishment of milestones. 13% of the recommendations in Annex I focused on this element of the CSP and 46% of these recommendations led to an update of the CSP. As explained in the [analysis and synthesis of the evaluation themes, Section 2.3.1](#), the majority of recommendations focused on missing or inconsistent information which was addressed in the CSPs. This entailed the need to correct inconsistencies in the intervention description tables, align them with the target values and update intervention text to avoid conflicting statements regarding the contributions of interventions to result indicators. Furthermore, several recommendations emphasised the importance of providing the assumptions underlying the assigned value to the target, particularly on result indicators.

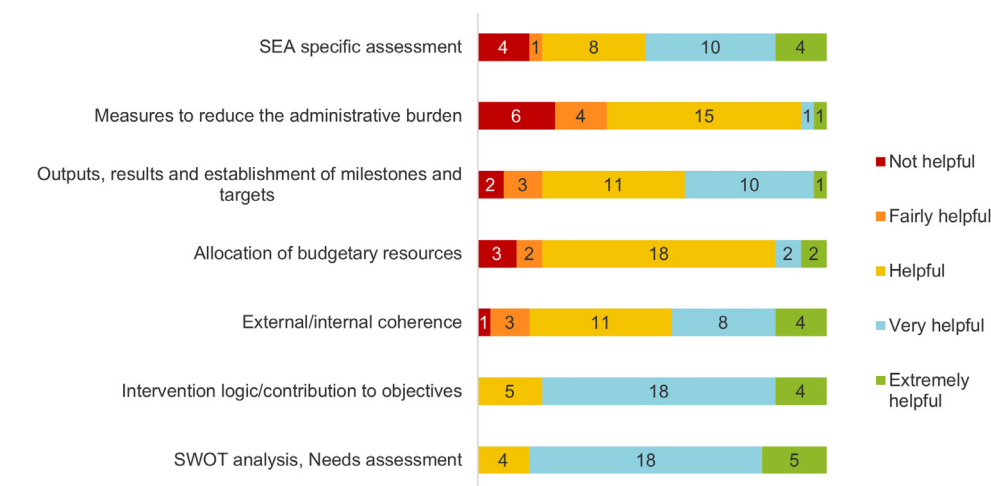
In total, 22% of the recommendations focused on the intervention logic of which 46% led to an update of the CSP. Some recommendations addressed specific deficiencies in terms of a lack of complementarity between interventions, especially between the EAGF and EAFRD. For instance, recommendations called for a need to demonstrate synergies between sectoral interventions and the support instruments under SO1, SO2 and SO3 to highlight the contribution towards the SOs. As outlined in the synthesis analysis, some *ex ante* evaluators expressed doubts or pointed to an incomplete or inadequate representation of certain SOs. However, while some evaluators often confirmed the presence of a causal link between the intervention logic and the SOs, they also indicated that this could be further strengthened by clearly stating the potential impacts or defining eligibility conditions more precisely.

The highest percentage of recommendations that were not addressed in the CSP were linked to those emanating from the SEA, as well as those related to the allocation of budgetary resources

(49%). In this respect, it should be noted that evaluators, during the focus group discussion, referred to gaps in assessing the potential impact of the CSP towards the Green Deal ambitions. This was due to various factors such as the fact that the *ex ante* evaluation was conducted prior to the establishment of Green Deal targets (CY) as well as the fact that the attainment of the Green Deal targets does not solely depend on the agricultural sector. Furthermore, the target values presented in the CSP are linked to output and result indicators with no established connection to the impact indicators. Without a connection to the impact indicators, it was not possible to determine the contribution of the CSP to any quantifiable impacts including the Green Deal targets. While it is acknowledged that the CSPs focus more intently on output and result indicators, the lack of identification and link to impact indicators created a gap in the intervention logic making it difficult to assess the contribution in terms of potential impact. This issue is further magnified by limitations in time and resources to assess the potential impact. In Sweden, although the mandate of the *ex ante* evaluation did not require an assessment of impact, the evaluators did consider the impact of the programme on climate, biodiversity and certain elements of rural development. However, there were challenges encountered in doing this such as the availability of data to assess whether certain interventions would be beneficial from a climate perspective or not.

The analysis presented above using the information from Annex I is also consistent with the analysis from the MA survey, where it was observed that most of the useful recommendations from the *ex ante* analysis were linked to the SWOT and needs assessment as well as the intervention logic (Figure 30). While recommendations on the allocation of budgetary resources, outputs and results, as well as those from the SEA, were also helpful, some responses indicated that the recommendations were less helpful.

Figure 30. The elements from the *ex ante* evaluation or the SEA helped the most to improve the CSPs



n=27

Source: European Evaluation Helpdesk for the CAP (2023)



3.3.2 To what extent were the conclusions and recommendations provided in the *ex ante* evaluation considered in the finalisation of the CSPs?

3.3.2.1 Key findings

- The final set of recommendations provided in Annex I only reflects a small proportion of the entire set of recommendations.
- Overall, about 42% of the recommendations led to an update of the CSPs, while for 36% of the recommendations, there were no resulting changes to the CSPs, although information was provided accordingly.
- At 28%, the highest level of recommendations was associated with environmental objectives, although the majority did not lead to a change in the CSP. Conversely, while 18% of the recommendations related to multiple objectives, the majority of these recommendations were taken on board and led to an update of the CSP. Likewise, recommendations on societal objectives which accounted for 16% of the recommendations and economic objectives, which accounted for 15%, led to changes in the CSP.
- Overall, these recommendations contributed to positively shaping the CSPs. Recommendations calling for better use of data, strengthening of synergies between interventions, addressing gaps between needs and interventions, and improvements in the links between interventions and indicators led to an overall better quality in terms of the design of the CSPs.

3.3.2.2 Analysis

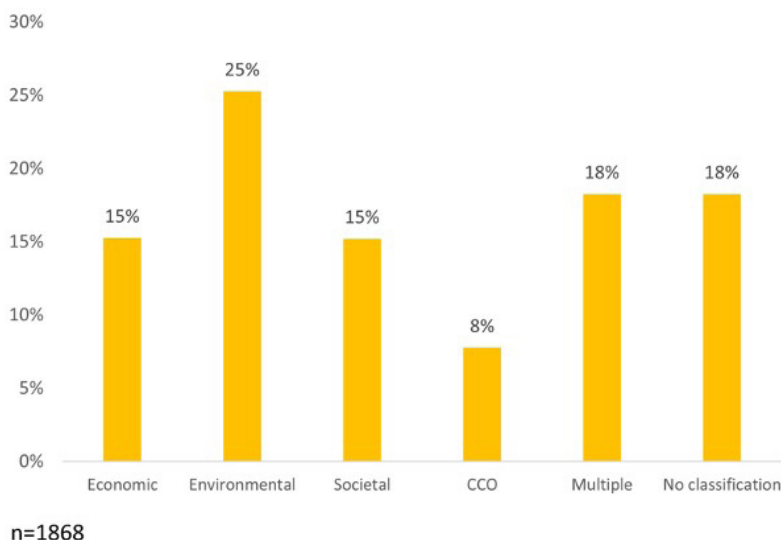
As previously explained, a total of 1 868 recommendations were submitted as part of Annex I, from 28 CSPs. Overall, about 42% of the recommendations led to an update of the CSPs, while for 36% of the recommendations, there were no resulting changes to the CSPs, although information was provided accordingly. For 6% (112) of the recommendations, no information²⁸ was provided by the MAs on how the recommendations were addressed, while for the remaining (16%), it is unclear whether the justification provided by the MAs in Annex I led to an update of the CSP.

A breakdown of the recommendations by type of objectives indicates that 25% were linked to the environmental objectives,

followed by 18% related to multiple objectives, 15% for societal objectives and 15% for economic ones. Furthermore, for 18% of the recommendations, no SOs were identified in the Annex. For instance, the recommendations presented in Annex I of the Irish and Italian CSPs were not categorised by SOs²⁹ (Figure 31).

While in the case of multiple and societal objectives, most of the recommendations led to a change in the CSP, the recommendations on the environmental and economic objectives did not lead to a change in the CSPs (Figure 32).

Figure 31. Recommendations by type of objective



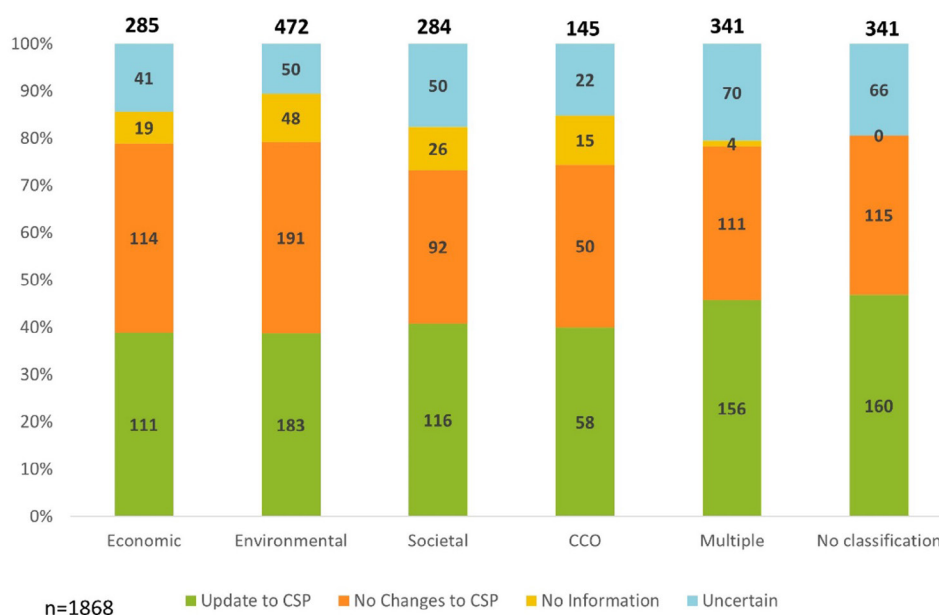
Source: European Evaluation Helpdesk for the CAP (2023)

28 While Annex I had to be submitted with the CSP, Member States were not legally bound to provide information on how or whether the recommendations were addressed. Furthermore, some Member States opted not to classify some or all of the recommendations by SOs.

29 For Croatia, the Netherlands, Lithuania and Austria, a number of recommendations were also not categorised by SOs.



Figure 32. Addressing recommendations by type of objectives



Source: European Evaluation Helpdesk for the CAP (2023)

Cross-tabulation of the SOs and the categories of recommendations show some interesting results, for instance:

- Almost 30% of the recommendations linked to economic objectives centred on the intervention strategy. Of these, 36% led to an update of the CSP.
- 27% of the recommendations linked to the environmental objectives were derived from the SEA-specific recommendations, of which only 22% led to an update of the CSP.
- 33% of the recommendations linked to the societal objectives were derived from the assessment of the interventional logic, of which 37% led to an update of the CSP.
- Almost 23% of the recommendations linked to multiple objectives were linked to the SWOT and need assessment and the intervention logic, of which 64% led to an update of the CSP.

A disaggregation of the recommendations at Member State level indicates that for 12 CSPs (CY, CZ, DE, EE, ES, HR, IT, LT, MT, NL, PT, RO), more than half of the recommendations submitted as part of Annex I, led to an update of the CSP. Conversely, for four CSPs (HU, LV, PL, SE), more than half of the recommendations did not lead to any changes in the CSP.

Some interesting observations on the recommendations that have led to changes in the CSP, and have thus shaped the design of the programmes, include:

Economic Objectives:

- The need to establish synergies between sectoral interventions and support instruments under SO1, SO2 and SO3 to develop smart, resilient and diversified sectors (BG).
- The need to highlight experiences gained in previous programming periods.
- Use of data on farm structure and the characterisation of national livestock numbers to set the context and basis for the SWOT and needs analysis (PT).

- Improvement in the intervention logic for SO1 (LU).
- Strengthen the link between interventions and output indicators and clarify the use of certain result indicators (EL).

Social Objectives:

- Recommendation to reconsider and adjust the need to include rural business activities (SK).
- Outlining further the need to facilitate access to finance for young farmers (BG) and to use additional data to highlight the needs of young farmers (PL).
- Recommendations to address gaps between the selection of interventions and the needs identified under SO8 (ES), as well as the need to use relevant data to confirm whether the challenges facing rural women are ongoing.

Environmental Objectives:

- Importance of providing training and technical support to promote best practices, low-impact technologies and ecological criteria. For instance, in Greece, the availability of specialised advisory services in environmentally degraded areas due to agricultural activities will be taken into account in the calls for interventions.
- Enhance efforts aimed at mitigating the environmental impact of interventions by considering environmental aspects in selection criteria and promoting environmentally friendly designs (MT, RO, SI, SK).
- Strengthening the intervention logic by highlighting the environmental and climate needs in the description of relevant interventions (CZ).



- › Addressing challenges for specific indicators such as Result Indicator 15³⁰ whereby it is recommended that the complexity of the indicator and the experiences from previous periods create a situation in which the evaluation team recommended that the MA draws up the necessary measures to support the actors that need to be involved in collecting the information to quantify the result (ES).
- › Clarifications on the assumptions used to determine specific result indicator target values (ES).

CCO:

- › Recommendations to clarify the concept of AKIS and the information flows (LU).
- › Highlight the lack of a strategy for digitalisation in the area of agriculture, which would significantly assist in the preparation and implementation of the CSP. Among other things, digitalisation is also linked to the obligation to use the Farm Sustainability Tool (FaST) as a digital application from 2025 onwards (SK).

While a number of recommendations in Annex I did not lead to changes in the CSP, there are instances where the MA took note of the recommendations to address them during the implementation of the plan. A case in point is a number of recommendations on the environmental objectives which focused on the impact of the CSPs. In this regard, the information provided by MAs was that the impact of the CSPs would be considered at a later point in time in light of subsequent evaluations and not at the level of programming. For instance, for the Swedish CSP, it was noted that it is particularly important that new interventions, such as eco-schemes, are followed up with an ongoing evaluation of their impact.

Specific to economic objectives, a recommendation from the Croatian *ex ante* report made reference to a need in the CSP

(provision of agricultural insurance for small farmers) which was not addressed by any specific interventions of the CSP. While this did not lead to an update of the CSP, the MA noted that there are measures under the CSP to increase the level of knowledge in the field of risk management with a focus on small farmers. In terms of societal objectives, recommendations were also made through the *ex ante* evaluation reports which did not lead to a change in the CSP including the adoption of interventions to address sustainable food consumption (AT) While this recommendation was not taken on board, the MA did note that there were accompanying measures which address this need but are outside the CSP.

Overall, it can be concluded that the recommendations as presented in Annex I contributed towards shaping, in a positive manner, the design of the CSPs³¹. This is further attested through the MA survey. It was particularly the case for recommendations linked to multiple objectives, societal objectives as well as economic objectives. Recommendations calling for better use of data, strengthening of synergies between interventions, addressing gaps between needs and interventions, and improvements in the links between interventions and indicators led to an overall better quality in the design of the CSPs.

It is however important also to stress that while there were recommendations that did not lead to changes in the CSP, particularly those linked to environmental objectives, such recommendations should be monitored throughout the implementation of the programmes. This is particularly the case in terms of monitoring the impact of the programmes and determining their contribution towards SOs. Also, needs that have been identified in the programmes but are not addressed through the funding available in the CSP should be monitored to ensure that the wider objectives of the sector are met.

3.4 AQ4: What good (*ex ante*) evaluation practices can be identified across Member States?

This section of the appraisal focuses on the identification of good practices and lessons which can be taken forward in the evaluation of future programming periods.

This appraisal draws on:

- › The identification of issues related to completeness, coherence and relevance, targets and milestones, budget allocations and other relevant elements identified during the analysis;
- › Any recommendations which positively shaped the quality of the CSPs.

It also draws on the abovementioned AQs, whereby best practices are considered in terms of:

- › Processes for carrying out the *ex ante* evaluation report;
- › Interaction between evaluators and MAs;
- › Involvement of stakeholders.

30 Renewable energy from agriculture, forestry and from other renewable sources: Supported investments in renewable energy production capacity, including bio-based (in MW).

31 It is to be noted that the recommendations in the Annex I represent only a small and final subset of recommendations as numerous other recommendations were made throughout the evaluation process which also contributed positively towards shaping the design and quality of the CSPs.



3.4.1 Good Practices in performing *ex ante* evaluations

Table 8. Description of good practices by category in performing *ex ante* evaluations

| Category | Good Practices |
|---|---|
| SWOT and needs analysis | To collect feedback on the SWOT and needs analysis, participative workshops were organised in collaboration with sectoral stakeholders. The MA for Flanders (Belgium) conducted five workshops involving all major sectors of Flemish agriculture, extending invitations to anyone who could provide valuable input. |
| Prioritisation of needs | Prioritising needs through the adoption of a multi-criteria methodology. The Spanish MA adopted four general prioritisation criteria, applicable at the national level and a territorial criterion, divided into levels that determined the prioritisation of the scope and importance in each of the 17 Autonomous Communities. For each of the initial assessments of the criteria, a justification was provided. Once the prioritisation of the specific needs for each SO was carried out, a second prioritisation was undertaken of the total needs included in each of the three blocks defined by the GOs of the strategy. |
| Identification of lessons learned | The Danish Agricultural Agency enhanced its knowledge by incorporating insights and lessons learned from previous experiences. They also drew from similar measures and activities outside of the CSP and implemented by other agencies, such as the Danish Environmental Protection Agency, the Danish Transport Agency and the Housing and Planning Agency. This allowed the agency to leverage valuable knowledge and expertise from multiple sources. |
| Financial instruments | The evaluators of the Slovak CSP noted that the early implementation of a separate <i>ex ante</i> for financial instruments in Slovakia was essential to enable the timely and correct introduction and adoption of this measure. In terms of the non-use of financial instruments, the Finnish CSP provided an extensive analysis of why financial instruments would not be in a position to serve the aims and objectives of farms and rural businesses. |
| Specific interventions | At the level of interventions, internal calculations were presented for the CSP in Flanders (Belgium) showing that medium and smaller-sized farms would lose substantial income regarding payment entitlements. This conclusion led to the adoption of a need to focus on a more even and targeted distribution of direct income to specific target groups. The evaluators also calculated how the level of income support was positively correlated with age to the extent that EUR 28 is provided per additional year of the age of the farm manager. |
| Budget allocation | When it comes to the distribution of budgetary resources, the <i>ex ante</i> evaluation report for the Austrian CSP sought to assess the consistency of the budget allocation by linking it to the SOs although this was not a requirement of the CSP. The exercise provided a comprehensive overview of the CSP by mapping also the allocation of funds to the prioritised needs and subsequently to the SOs indicating the financial commitment to each objective. |
| Milestones setting | <i>Ex ante</i> evaluations also considered the examination of possible threats, internal and external, to attain milestones and the preparation of a contingency plan to be a very good practice. |
| Environmental and climate change impact | Specific to the Green Deal targets, the Spanish CSP provided a table that connected prioritised needs per SO and conditionalities and then explained how conditionalities address Green Deal targets. Also interesting is the case that in the Danish <i>ex ante</i> evaluation report, the climate and environmental impacts were presented in two respective tables for selected schemes' climate effects (CO ₂ -eq) and nitrogen leaching, calculated by the Danish Agricultural Agency. |
| | In Sweden, although the mandate of the <i>ex ante</i> evaluation did not specify an assessment of impact, the evaluators did consider the impact of the programme on climate, biodiversity and certain elements of rural development. In doing this, however, they did encounter several challenges, such as the availability of data to assess whether certain initiatives would be beneficial from a climate perspective or not. |
| | In Germany, the evaluators assessed the environmental obligations of Annex XIII of Regulation (EU) 2021/2115. |



| Category | Good Practices |
|---------------------|---|
| Use of visual tools | The Bulgarian CSP considered lessons learned and presented them in a table listing all documents reviewed, relevant overall conclusions as well as recommendations. |
| | A transparent methodological approach to link the SWOT to the needs. In the <i>ex ante</i> evaluation for Greece, a table was presented for each of the interventions to show the link to the identified needs, the result indicators and subsequently to the SOs. |
| | In the case of Flanders (Belgium), a table was included in the <i>ex ante</i> report to identify the links between the different interventions and the GAECs or SMRs. |
| | Specific to the intervention logic, the use of visuals such as tables and matrices presents a logical flow between the SWOT and needs assessment and the selection of the measures. Such an approach was adopted in Slovakia and Italy whereby the coherence of the intervention logic was mapped to each intervention and to one or several SOs. |
| | Through the support of the <i>ex ante</i> evaluation team, a database was also developed for the Austrian CSP which mapped all 96 interventions against 45 needs. This proved useful to understand the architecture of the CSP. |
| | The Latvian CSP presented a table showing all interventions, their expected result indicators and their annual values, which the <i>ex ante</i> evaluation found to be a good practice. |
| | In the case of the Netherlands, the <i>ex ante</i> evaluators included a web chart to visualise the environmental impact assessment of two alternatives; one that was characterised by a focus on a relatively high-level of income support combined with general environmental and biodiversity improvements by funding interventions, which farmers choose voluntarily. The second alternative was characterised by a relatively high standard for the basic premium and a contribution from the CAP to two area-based national policies: level increase in peat meadows and buffer zones around Natura 2000 sites. Towards this end, the <i>ex ante</i> evaluation report presented visually the effect of these alternatives on specific elements such as climate, biodiversity, landscape quality, soil and water quality, water quantity, animal welfare and other relevant elements. |

3.4.2 Good practices identified in terms of the evaluation process

Table 9. Good practices identified by category in terms of the evaluation process

| Category | Good Practices |
|--|--|
| Evaluation process | While the setup of workshops was challenging to conduct, particularly during and post-COVID period, the outcome of the workshops provided substantial input for the <i>ex ante</i> evaluation and enhanced the quality of the reports. |
| | In Austria, a total of about 20-25 workshops were conducted with technical departments which allowed for a detailed assessment of the <i>ex ante</i> evaluation. |
| | The conduct of the <i>ex ante</i> evaluations in parallel to the development of CSPs can be considered to be a good practice, particularly within the context of tight timeframes to design and effectively evaluate the CSPs. However, the effectiveness of this multiphase approach depends on an open, frequent and structured dialogue between the MAs and evaluators. |
| Structure for addressing recommendations | The robustness of the <i>ex ante</i> evaluation process depends on the extent to which the recommendations feed into the CSP and enhance its quality. This very much depends on the set up of a formal process for the recommendations which clearly identifies whether such recommendations are taken into consideration or not. |
| | A good practice has been identified in Germany whereby the framework of recommendations is based on a RAG (Red, Amber and Green) system allowing for the prioritisation of recommendations and providing a mechanism for feedback to be taken into consideration. |



| Category | Good Practices |
|--------------------------|---|
| Stakeholder consultation | <p>In some instances, the <i>ex ante</i> evaluators conducted extensive stakeholder consultations. In France, a survey was carried out by the <i>ex ante</i> evaluator among the actors involved in the preparation and future management of the CSP. It gathered the views of nearly 20 partners and contributors with the majority of respondents expressing their satisfaction with their involvement and the extent to which their opinions or proposals were taken into account. The consultation was considered very useful. Likewise, an extensive stakeholder consultation exercise was undertaken in Estonia where the <i>ex ante</i> evaluators conducted two online surveys, seven focus group discussions and one workshop, as an input for the evaluation. For the stakeholder workshop, the emphasis was on the validation of the <i>ex ante</i> assessment with a focus on the financial plan and metrics (<i>ex ante</i> evaluation report)</p> |
| | <p>In order to avoid stakeholder fatigue, common consultation elements could be identified. For instance, the involvement of evaluators in consultation sessions organised by the relevant ministry for the SWOT and needs assessment is considered a good practice. This avoids a situation where both the ministry and the evaluators engage in separate consultation sessions. This however requires effective planning so that evaluators are brought on board at the onset of the process.</p> |

4. Conclusions and recommendations

This section provides the conclusions drawn from the synthesis and the appraisal of the *ex ante* evaluation of the 28 CSPs.

Conclusions from the synthesis exercise are articulated around five themes:

- › Assessment of the context and needs;
- › Relevance, internal and external coherence of the programmes/ plans (including the adequacy of budgetary resources for the achievement of the targets set) and consistency of the allocated resources as well as the suitability of the selected targets and milestones;
- › Assessment of the expected outputs, results and impacts of CSPs;
- › Assessment of the measures planned to reduce administrative burden;
- › Assessment of horizontal themes (such as the contribution to the Green Deal and Farm to Fork Strategy).

Furthermore, conclusions are drawn on the extent to which the *ex ante* evaluation reports establish that the CSPs contribute to the SOs of the CAP.

Conclusions on the appraisal of the *ex ante* evaluation cover:

- › The completeness, comprehensiveness and coherence of *ex ante* evaluation reports;
- › The process followed to conduct the evaluations;
- › The extent to which their conclusions were taken into account in the CSPs.

Finally, this section provides eight areas for improvements which aim to enhance the effectiveness and comprehensiveness of the *ex ante* evaluation process and support the successful design and implementation of the CSPs.

4.1 Conclusion of the synthesis assessment, including contribution of the CSPs to the CAP objectives

4.1.1 Assessment of the context and needs

The context, SWOT analyses and needs assessment have proven to be essential tools in the process of developing a solid basis for designing the CSPs. The *ex ante* evaluation reports indicated that most Member States dedicated considerable effort to collecting and assimilating an extensive range of data, information and studies, as well as mobilising and engaging stakeholders to synthesise knowledge for each SO. This extensive process facilitated a thorough and cohesive understanding of how the CSP could potentially contribute to each SO, focusing on the identification of needs and determining the most effective approach to address them.

However, in some instances, the context and SWOT analyses were difficult to exploit and overly technical, with the key elements useful for policymaking becoming hard to distinguish. Evaluators observed that most CSPs had made efforts to present complete and coherent data. By leveraging the vast amount of collected information, the 28 SWOT analyses offered specific and actionable insights to policy makers. Recommendations were provided to address issues such as the use of more recent or specific data, misplaced SWOT elements (i.e. elements classified as strengths instead of opportunities) and the rationale behind certain SWOT items.



The needs assessment and prioritisation phase followed the context and SWOT analyses, as observed in the *ex ante* evaluations. The CSPs effectively identified needs that were well rooted in the context and SWOT analyses, indicating a logical relationship between the processes. However, only about half of the CSPs linked the identified needs with the environmental and climate plans outlined in Annex XIII of Regulation (EU) 2021/2115. In all CSPs, the needs were prioritised based on the SOs. The *ex ante* evaluations confirmed that the prioritisation process followed a well-described methodology with clear and transparent criteria and classification procedures. Yet, a few evaluations concluded that the methodologies employed were not sufficiently detailed. Nevertheless, this approach allowed Member States to create customised rankings that considered national specificities, regional factors, stakeholder perspectives and societal opinions. Consequently, the needs and rankings were adapted accordingly, resulting in each CSP having its own informed priority list of needs that could be used to inform potential contributions of interventions towards the CAP objectives.

The examination and presentation of experiences and lessons learned from previous programming periods, and the implementation of similar interventions in the past, was neglected to some extent. This is not to say that it was completely overlooked, but rather that the relevant data may not have been readily available, accessible, or of reliable quality, thus requiring further processing and analysis. Furthermore, the needs assessment did not address gender-specific issues adequately and fell short in addressing matters concerning the effectiveness, efficiency and fairness of direct payments. Generally, there was a lack of research and evaluation on social, organisational and institutional aspects, resulting in their limited representation and discussion in the context analyses. Finally, evaluations indicate that only a few CSPs took account of farm structures or risk management in relation to achieving a fairer distribution of direct payments.

Some evaluators criticised the excessive focus on data analysis, which occasionally resulted in a dry and technical presentation of trends and situations, lacking discussion, explanation or the narrative of the economic, social and environmental factors behind the data. These evaluators emphasised the need for a better balance between the academic, scientific approach and the evaluative approach, aiming to provide an 'informed' assessment to a less technically-oriented audience. Additionally, the implementation of separate analyses for the overall context, SWOT and needs assessment for each SO may have led to a compartmentalised approach to the design of the CSPs. Because of this fragmentation, obtaining a comprehensive and unified perspective for the entire CSP, a particular GO, a sector, or a territory could sometimes pose a challenge.

4.1.2 Relevance, internal and external coherence of the programmes/plans (including the adequacy of budgetary resources for the achievement of the targets set) and consistency of the allocated resources as well as the suitability of the selected targets and milestones.

Almost all *ex ante* evaluations confirmed the overall consistency of the proposed intervention strategies, the identified needs and the expected contribution of the assigned SO. The vast majority of evaluators considered the designed interventions to be at least fairly aligned with the identified needs. For all CSPs, the *ex ante* evaluators confirmed that there is at least a fair degree of coherence, consistency, synergy and balance between the CSP interventions.

However, there are areas for improvement. The evaluators suggested that a more precise intervention logic should be provided, along with detailed eligibility conditions. They also highlighted the need to justify regional disparities in intervention offers and to incorporate lessons learned from past programming periods. In some cases, evaluators noted only partial coherence and inconsistency in interventions, particularly when the CSPs were not yet fully developed. Recommendations were made to enhance internal coherence per SO, address regional needs more effectively and specify the interactions between interventions, eligibility criteria and conditionalities. Furthermore, in several instances, *ex ante* evaluators flagged the need to take account of lessons learned from past programming periods, notably past interventions financed by EAFRD, for interventions related to SO4, SO5 and SO6.

Regarding the consistency of interventions' eligibility conditions with GAEC standards and definitions, only 18 *ex ante* evaluation reports confirmed that the interventions and their eligibility conditions were at least fairly consistent with GAEC standards and definitions, while ten reports did not make reference to this. Recommendations focused on providing further details about the interaction between GAEC standards and other environment and climate interventions. Lessons learned from past programming periods were taken into account, although some CSPs lacked clear references or sufficient information in this regard.

In total, 23 *ex ante* evaluations confirmed that the allocation of budgetary resources to each intervention was at least fairly justified by the assessment of needs, while 24 evaluations confirmed that the allocation of budgetary resources and the assigned unit costs to each intervention were at least fairly consistent with the targets set in the CSP. However, some evaluators suggested that there was a need for more thorough justifications and clarification of the link between needs, interventions to address them and their respective budget. Synergies and complementarities between interventions could also be better explained. While a breakdown of the budget by objective was not required (e.g. due to the multifunctional impact of interventions), it was noted that such an allocation would have improved clarity.

Limitations of the evaluations were mentioned and attributed to the use of an early draft of the CSPs for the assessment. Assessment of budget transfers were rarely made due to a lack of information at the time the *ex ante* evaluation was carried out.

Evaluators' reports highlight the varying levels of coherence between the CSPs and other relevant policies. Here, 22 *ex ante* evaluation reports confirmed that their national CSPs complemented the policies listed in Annex XIII of Regulation (EU) 2021/2115, and 26 *ex ante* evaluations confirmed that the CSPs were at least externally coherent with other policies. However, the degree of detail the CSPs or evaluators provided varied greatly among Member States and between SOs. CSPs often provided overly general descriptions or demonstrated only partial coherence, especially for objectives SO4, SO5, SO6, SO8 and SO9. Finally, most of the CSPs did not make reference to the use of lessons learned from past experience in addressing external coherence, which may indicate a potential shortcoming.

The evaluators identified potential trade-offs, overlaps and funding gaps between the CSPs and other policies, underscoring the necessity for clearer descriptions and explicit links to ensure coherence. Several recommendations were made, especially linked to environmental objectives, but most of them did not lead to an update of the CSP.



In conclusion, while the CSPs generally demonstrate overall consistency between the proposed intervention strategies, identified needs and expected contributions to the SOs, there is room for improvement. Enhancing intervention logics, providing more detailed eligibility conditions, justifying regional disparities and incorporating lessons learned from past programming periods can further enhance the effectiveness and impact of the intervention strategies across all CSPs. Finally, regarding external coherence, evaluators noted trade-offs, overlaps and funding gaps between the CSPs and other policies, emphasising the need for clearer descriptions and explicit links to ensure coherence, although most recommendations, particularly regarding environmental objectives, did not result in CSP updates.

4.1.3 Assessment of the expected outputs, results and impacts of programmes/plans

In total, 26 *ex ante* evaluations confirmed that the target values for the result indicators were at least fairly traceable and justified in terms of inputs, outputs and their values, and 26 evaluations confirmed that the target values were realistic and appropriate, justified and comprehensive and also considered the financial allocation per intervention to generate the expected results. However, only 12 *ex ante* evaluation reports confirmed that the annual milestones were at least fairly suitable for each relevant result indicator. *Ex ante* evaluators emphasised that the methodological basis for calculating target values is provided or referenced, and the quantified outcomes are cited. When setting target values, the CSPs considered several factors such as identified needs, planned intervention budgets, previous experience, absorption capacity, beneficiary expertise, environmental and climate issues, and availability of reliable data sources. Most CSPs accounted for a combination of these factors to ensure the adequacy and appropriateness of the planned targets.

Some CSPs identified specific risks and internal or external factors that could influence the attainment of milestones. These factors included socio-economic context, legal frameworks, climate conditions, information quality and beneficiaries' ability to implement interventions. *Ex ante* evaluators identified areas for improvement, including the need for more complete and consistent information, further explanation of assumptions in target setting, revisiting intervention logics for complementarity and better assessment of the immediate impact of interventions.

While 13 CSPs referenced lessons learned from past implementation periods, approximately half of the CSPs did not document or reference lessons learned from similar interventions. Furthermore, only nine *ex ante* evaluation reports assessed the CSP's potential contribution to impact indicators, with varying approaches taken. Most reports lacked a quantitative assessment due to a lack of clarity about the linkages between impact indicators and SOs. Recommendations (LT, RO) were made to establish a clear connection between result and impact indicators for evaluating the CSP's ambitions and quantitative contribution to EU targets.

4.1.4 Assessment of the measures planned to reduce administrative burden

In all Member States, *ex ante* evaluators confirmed that the design of the policy and interventions, including throughout the different steps of the policy cycle, adequately supports simplification within the CSPs, albeit with room for further improvements. Indeed, concerns were raised about the extent of simplification achieved since,

in some cases, this was difficult to ascertain as details regarding implementation were yet to be defined in guidelines and instructions.

The evaluators also noted that the authorities had made considerable effort to digitalise and automate the application and handling process, which will further contribute to the simplification of the policy. From the evaluators' point of view, the CSPs are also promoting simplification and reduction of administrative burden through the use of digital application systems, emphasising the use of digital tools and applications to simplify and reduce administrative tasks at different stages of the applicant-agency interface. Most recommendations note that further improvement might be needed to ensure the digital application systems are user-friendly and accessible to all beneficiaries, including the smallest farms. Additionally, the evaluators emphasised that clear and consistent instructions to beneficiaries on how to complete their payment claims and applications for support, where relevant, are essential for reducing administrative burden.

The interventions in the CSPs are usually well described, consistent, non-contradictory and have been analysed at national and regional levels to ensure consistency. However, in some CSPs, evaluators commented on the number of interventions related to the new environmental and climate architecture. They highlighted cases where a significant number of interventions makes implementation more challenging or where the design of interventions needs to ensure good coordination between the various elements of the green architecture to guarantee that farms can select the right combinations of interventions without errors. The most common recommendations include further simplification of the policy by specifying certain aspects and the possible combination and interaction between conditionalities, eco-scheme and other agro-environmental and climate interventions.

4.1.5 Assessment of horizontal themes

All CSPs provided explanations about how they intended to contribute to national Green Deal targets, although in most cases the *ex ante* evaluations did not comprehensively consider the targets in their evaluations (as this was not foreseen by Article 139 of Regulation (EU) 2021/2115). Twenty *ex ante* evaluations confirmed that the CSPs fairly reflected their intended contributions towards some of the selected EU-level targets arising from the Farm to Fork Strategy and Biodiversity Strategy. Evaluators noted that the CSPs primarily focused on resource and environmental dimensions, addressing pesticide use, organic agriculture and high-diversity landscapes. However, targets related to nutrient loss, antimicrobial resistance and fast broadband internet rollout received hardly any attention.

In total, 18 *ex ante* evaluation and SEA reports found that the CSPs explicitly provided a sound explanation of how the GAECs and SMRs support the achievement of national Green Deal targets. However, evaluators identified limitations and made recommendations based on the SEA reports. Concerns were raised about the effectiveness of interventions, the ability to attract farmers to voluntary schemes and the potential negative impacts on the environment due to other interventions.

The low unit amounts proposed raised doubts about the attractiveness of certain interventions and their potential to achieve environmental outcomes. Trade-offs between Green Deal targets and other interventions, such as direct payments and investment measures, were also highlighted.



In terms of the CSPs' environmental and climate architecture, the vast majority of *ex ante* evaluation reports confirmed that the CSPs provided evidence of their contribution to increasing environmental and climate ambitions. Here, 26 CSPs showed at least a fair degree of ambition for at least two environmental and climate objectives (SO4, SO5, SO6), or set and demonstrated ambitious environmental and climate goals. 21 CSPs provided evidence of increased climate ambition through their overall contribution to climate mitigation and adaptation. The main recommendations emphasised the need to incorporate environmental considerations into eligibility conditions for interventions that do not specifically address environmental objectives. Additionally, promoting environmentally friendly design was recommended in order to prevent the inclusion of interventions that may have adverse effects on, for example, water regimes and contribute to increased use of fertilisers and plant protection products.

4.2 Conclusion of the appraisal and limitations

4.2.1 Completeness, comprehensiveness and coherence of *ex ante* evaluation reports

In terms of completeness, the majority of *ex ante* reports exhibit a clear structure. However, slightly more than half of the reports lack a clear focus with findings scattered across the reports or not effectively communicated, which hindered the assessment process. While most *ex ante* evaluations fulfilled the requirements linked to Article 139 of Regulation (EU) 2021/2115, there were a few exceptions. For instance, not all CSPs included financial instruments and thus only 13 *ex ante* evaluations assessed the requirements linked to Article 139 (g).

Regarding comprehensiveness and coherence, most *ex ante* evaluations (21) followed the evaluation toolkit, even though it was not mandatory. All *ex ante* evaluations used varied methodologies, with most reports providing an overview of the evaluation framework and process, and a few others outlining it for each evaluation phase. Nearly all *ex ante* evaluations went beyond the requirements outlined in Article 139 to some extent. For the assessment of context and needs, the majority of reports (excluding BE-WL, FI, RO, SE) provided information on whether the SWOT analyses were based on up-to-date evidence, incorporated statistical sources and took note of previous studies. Internal coherence was assessed in all evaluations except for two (AT, BE-WL). However, evaluating the external coherence of the CSPs proved to be challenging due to the fact that evaluators received early draft versions of the CSPs and often only specific chapters. This was the case for Wallonia (Belgium), Czechia, Finland, Luxembourg and Germany.

Furthermore, the *ex ante* evaluations varied in their specificity and consideration of specific requirements for certain objectives. National and regional specificities were considered and reflected in the analysis of 25 *ex ante* evaluation reports. There were differences in the level of detail provided for addressing specific requirements related to Annex XIII of Regulation (EU) 2021/2115. Only 15 *ex ante* evaluations assessed the needs addressed in national environmental and climate plans listed in Annex XIII, while the remaining reports focused less on this aspect. Most *ex ante* evaluations presented key sectoral aspects in their SWOT analyses, except for Wallonia (Belgium) and Estonia. However, half of the reports lacked information on the analysis of issues related

to agricultural income, specifically the fairer distribution of direct payments and risk management.

However, *ex ante* evaluators raised some concerns related to guidance and methodology for substantiating a credible claim for a 'higher' environmental and climate contribution. Therefore, the establishment of monitoring mechanisms to assess the environmental impact and progress towards environmental objectives was suggested. Additionally, the stated CSPs' contribution that were based on impacts may be questioned and disputed. Potential estimated impacts might be contested based on poorly implemented effectiveness analysis, failure to consider carbon leakages, and other possible adverse effects. Nevertheless, the CSPs' reference to significant climate change and energy commitments, resource conservation and protection strategies reassured awareness and synergy in the design of the intervention strategy with climate and environmental policies.

to agricultural income, specifically the fairer distribution of direct payments and risk management.

Regarding the evaluation of the contributions of the CSPs in achieving SOs, the analysis varied based on the presence of a dedicated section. When such a section was provided, the analysis was more comprehensive compared to cases where information was scattered. Evaluators rarely commented on potential impact, as the result indicators did not directly reflect any direct change on impact indicators. The evaluators suggested potential methodologies, such as quantitative analysis and the ToC, to assess the causal links between the interventions or the result indicators and impact indicators, but concerns were raised about data availability and the lack of established links with impact indicators. The evaluation of the unit amount per intervention was overlooked in many *ex ante* reports, relying mainly on lessons learned from the previous programming period without a clear explanation of how this experience was utilised. Additionally, only a limited number of *ex ante* reports identified specific risks or factors that could influence the achievement of targets and SOs. The identification of well-defined causal links between needs, interventions and result indicators often corresponded to the amount of information provided to evaluators.

Overall, the completeness, comprehensiveness and coherence of the *ex ante* evaluation reports vary across different aspects, with specific strengths and weaknesses identified in each evaluation.

4.2.2 The process followed to conduct the *ex ante* evaluations

A multiphase approach was adopted for all the *ex ante* evaluation reports whereby evaluators were provided with specific chapters of the CSP for evaluation, such as the SWOT and needs analysis, followed by subsequent chapters of the CSP. While this approach was considered practical given the tight timeframe for the adoption of the Regulation (EU) 2021/2115 and ongoing negotiations and discussions on the CSP, the process was challenging. The effectiveness of the process depended on establishing structured feedback mechanisms between the evaluators and the MA to allow recommendations from the *ex ante* evaluations to be taken into account.



Interaction between the evaluators and the MA was considered to be positive, with almost 90% of the respondents to the MA survey referring to a positive relationship with the *ex ante* evaluators and over 80% referring to a positive interaction with the team conducting the SEA.

Positive interactions were noted across most phases of the *ex ante* evaluation, albeit more prominently in the SWOT and needs assessment. This may be due to the fact that this was one of the phases for which sufficient time was available to evaluate the CSP as outlined in both the survey and focus group discussions. Overall, the interaction between the MA and the evaluators contributed towards a common understanding of the objectives of the *ex ante* evaluation, which also led to the development of recommendations and solutions towards improving the design of the CSP.

Wide stakeholder consultation was undertaken at the level of the *ex ante* evaluations through discussions with stakeholders, workshops and the development of surveys. While the comprehensive involvement of stakeholders strengthened partnership around the design of the CAP plan itself, the evaluators noted that the extensive stakeholder consultation undertaken at the level of the CSP, SEA and *ex ante* led to stakeholder fatigue.

One significant challenge encountered during the *ex ante* evaluation process pertains to the timing and versions of the CSP under evaluation. The essence of this challenge lies in the fact that the assessments were conducted on a preliminary draft of the CSPs. As a matter of procedure, *ex ante* evaluations were meant to be conducted in parallel with the preparation of the CSPs. However, in practice, there was a noticeable lag between the completion of these evaluations and the final approval of the respective CSPs. This temporal discrepancy had a notable consequence that the *ex ante* evaluation reports did not accurately depict the eventual approved versions of the CSPs.

4.3 Recommendations

Based on the analysis, the following recommendations aim to enhance the effectiveness and comprehensiveness of the *ex ante* evaluation process and support the successful design and implementation of the CSPs.

4.3.1 Recommendations addressed to *ex ante* evaluators and MAs

1. Promoting early evaluation

The introduction of new interventions, such as eco-schemes, alongside a lack of concrete quantitative evidence to assess the potential contribution of the CSPs, highlights the need to define monitoring systems and evaluation plans early on in the process. Doing so will significantly contribute to a more robust *ex ante* evaluation. This would be particularly relevant for the next programming period.

4.2.3 To what extent were conclusions taken into account in the CSPs

The basis for considering the extent to which conclusions and recommendations were taken into account is mainly based on the submission of Annex I of the CSPs based on Article 115 of Regulation (EU) 2021/2115, which was filled in by the majority of CSPs.

In total, 1 868 recommendations were submitted as part of Annex I, from a total of 28 CSPs, though the extent of detail varies significantly between programmes. The majority of recommendations were made for the intervention logic (22%), closely followed by SEA specific recommendations (21%), and the SWOT and needs assessment (18%). Overall, about 42% of the recommendations led to an update of the CSPs, while for 36% of the recommendations, there were no resulting changes to the CSPs.

Overall, it can be concluded that the recommendations as presented in Annex I contributed towards positively shaping the design of the CSPs³². This is further confirmed through the MA survey. Indeed, this was particularly the case for recommendations linked to multiple objectives, as well as societal and economic objectives. Recommendations calling for the better use of data, strengthening of synergies between interventions, addressing gaps between needs and interventions, and improvement of links between interventions and indicators led to better overall quality in the design of the CSPs.

It is however important to stress that recommendations which did not lead to changes in the CSP, particularly those linked to environmental objectives, should be monitored throughout the implementation of the CSPs. This is particularly the case in terms of monitoring the impact of the CSPs and determining their contributions towards SOs. Needs that were identified in the programmes, but not addressed through the funding available in the CSP, should also be monitored to ensure that the wider objectives of the sector are met.

The promotion of early evaluation is also considered effective when a multiphase approach to evaluation is adopted. While this allows evaluators to provide feedback during each stage of the CSP drafting it must also be considered in relation to the fact that it may hinder a wider holistic view of the CSP.

2. Evaluate the final approved CSP

Approximately two-thirds of the *ex ante* evaluations were carried out based on a draft CSP. *Ex ante* evaluators did not always have access to the full CSP, but rather specific chapters. As a result, the evaluation of coherence, notably external coherence, proved to be challenging for the evaluators.

Without minimising the first recommendation to promote early evaluation, the EH recommends that the final *ex ante* evaluation report should be revised in light of the approved CSP and in its

³² Recommendations in the Annex represent only a small and final subset of recommendations as numerous others were made throughout the evaluation process which also contributed positively towards shaping the design and quality of the CSPs.



entirety. This, in turn, will allow the *ex ante* evaluation process to fulfil two objectives: to improve the quality of the design of the CSP and also to establish clearly the starting point of the evaluation process for the programming period and the potential contribution of the CSPs at the national and EU levels to the CAP SOs.

3. Leverage lessons learned from past programming periods

While lessons learned were acknowledged, their importance lies not in recognising them but in understanding how they contribute to the design of the CSPs. This is especially important for ensuring better adoption by farmers, pinpointing necessary improvements and achieving more efficient implementation. Additionally, the EH has identified several good practices, such as the use of visual tools to link identified needs to interventions, result indicators, etc. Such good practices could be considered for the next programming period.

4. Enable effective feedback mechanisms

As shown in the appraisal exercise, all *ex ante* evaluations have adopted a multi-phase approach in the context where CAP regulation was still under negotiation and the drafting of the CSPs under a multi-governance process. To effectively conduct such an approach, the *ex ante* evaluation requires a thorough tracking of changes made to the draft CSPs and the uptake of *ex ante* evaluation recommendations. In that respect, the EH recommend that *ex ante* evaluators prioritise their recommendations and that the MAs set up strong feedback mechanisms.

5. Targeted strategic stakeholder engagement

Stakeholder involvement should be used strategically to ensure meaningful engagement and prevent potential stakeholder fatigue between the various consultation processes carried out during the drafting of the CSPs. Under the scope of the *ex ante* evaluation, the EH recommends a targeted consultative process that effectively captures diverse perspectives and expertise.

6. Promote the use of visual tools

The use of visual tools has proven to be very helpful throughout the various stages of the *ex ante* evaluations. In several instances, visual tools were used to gain a better understanding of how interventions respond to the identified needs, how they are possibly linked to each other and/or to result indicators, and how they potentially contribute to the CAP SOs. These tools can enhance the clarity and accessibility of complex information, improving the communication of findings and recommendations. Further guidance on the use of visual aids would be beneficial.

4.3.2 Recommendations addressed to the European Commission

1. Broaden the *ex ante* evaluation scope

It was observed that most *ex ante* evaluations addressed requirements specifically outlined in Article 139 of Regulation (EU) 2021/2115, but were deficient in addressing legal obligations not specifically mentioned under this article, such as Article 108(c) of Regulation (EU) 2021/2115, which relates to an assessment of needs in relation to a fairer distribution and more effective and efficient targeting of direct payments. The EH therefore recommends leveraging and maximising the use of the *ex ante* evaluation to comprehensively assess all elements of the regulation. In the future, this could be translated in a change of Article 139 to cover all the legal obligations related to *ex ante* assessment.

2. Foster structural coherence and synergies across SOs by standardising the reporting structure

The EH observed that conducting the SWOT analysis and needs assessment by SO has enhanced the comprehensiveness of the analysis. However, it has also created a structural drawback by impeding a holistic analysis. Therefore, the EH recommend the establishment of a standardised structure for *ex ante* evaluation reports at the EU level. This will ensure homogeneity and facilitate the evaluation of CSPs' contributions to EU ambitions.

The *ex ante* evaluation report could be structured based on evaluation steps, which can be further broken down by SO. Additionally, it could include an assessment across all SOs to provide a comprehensive overview. Such a structure will promote an integrated and holistic approach throughout the design of CSPs, prevent fragmentation and foster coherence among the SO. By doing so, the potential synergies between different interventions and SOs can be maximised.

3. Establish better links with impact indicators

Regarding the assessment of the contribution of the CSPs towards the SOs or EU ambitions, the current intervention strategies developed by MAs lack established links with impact indicators. To enhance the *ex ante* evaluation process, it would be beneficial if impact indicators could be included in the intervention logic, to better capture potential impact. Additionally, the current budget allocations at the level of interventions and funds do not mirror the current intervention logic driven by SOs. A budget breakdown per SO would facilitate the assessment of this contribution and allow for better comparison between programming periods.



5. Annexes

5.1 Annex 1 - Publication dates of the *ex ante* evaluation and SEA reports

| Country code | <i>Ex ante</i> evaluation | | SEA [Directive 2001/42/EC] | |
|--------------|---------------------------|--|----------------------------|--|
| | Publication date | SFC version (if available) | Publication date | SFC version (if available) |
| AT | 23 Dec 2021 | Final version | Dec 2021 | Final version / ANr. 801305 |
| BE-FL | 08 Apr 2022 | Final report | Jun 2022 | Final version |
| BE-WL | Mar 2022 | Final report | 17 May 2022 | Reference number (C1263) |
| BG | Oct 2022 | N/A | Only year (2022) | Non-technical summary |
| CY | Oct 2022 | N/A | Aug 2022 | Version A |
| CZ | 27 Sep 2022 | Phase 3: Final report | Jul 2022 | N/A |
| DE | 04 Apr 2022 | N/A | 17 May 2021 | Revision 14 Dec 2021 |
| DK | 08 Dec 2021 | Report, 6th version | Dec 2021 | N/A |
| EE | 30 Dec 2021 | Final report | 06 Apr 2022 | Final version |
| EL | Mar 2022 | N/A | 20 Mar 2022 | N/A |
| ES | 15 Jul 2022 | N/A | 07 Jul 2022 | Modified version after public information (Versión modificada después de la información pública) |
| FI | 06 Apr 2022 | Final report | 18 Jun 2020 | N/A |
| FR | 20 Dec 2021 | Final report | 23 Mar 2020 | N/A |
| HR | 18 Mar 2022 | First version of the final <i>ex ante</i> evaluation report | Sep 2022 | N/A |
| HU | Jul 2022 | N/A | 12 Oct 2022 | N/A |
| IE | Mar 2022 | Final version | Sep 2022 | Final report |
| IT | Jul 2022 | Third draft report/third version | N/A | N/A |
| LT | 11 Apr 2022 | Final report | 22 Jun 2022 | Final report (Corrected version based on comments) |
| LU | Dec 2021 | Final report | Oct 2022 | Draft final report |
| LV | 21 Dec 2021 | Version 2/The following 16 pages of accounts were submitted on 18 October 2022 | Oct 2022 | N/A |
| MT | 25 Oct 2022 | Final report | Oct 2022 | Second/Final version |
| NL | 24 Dec 2021 | Final report | 14 Mar 2022 | Final report |
| PL | 23 Dec 2021 | Final report | N/A | N/A |



| Country code | Ex ante evaluation | | SEA [Directive 2001/42/EC] | |
|--------------|--------------------|--|--|--|
| | Publication date | SFC version (if available) | Publication date | SFC version (if available) |
| PT | Jun 2022 | Phase 1 Phase 2 Phase 3 Summary results and recommendations | Jul 2021 (First report Jun 2022 (Public consultation report) Jun 2022 (Final report) | First report Public consultation report Final report |
| RO | 10 Oct 2022 | Fifth (final) version | 16 Oct 2022 | Final report |
| SE | 16 Dec 2021 | Final report | 17 Dec 2021 | Final report |
| SI | Sep 2022 | Draft final report | Jul 2022 (amendments Sep 2022) | Final version |
| SK | Jan 2022 | Final report | May 2022 | N/A |

5.2 Annex 2 – Analytical framework and outcomes of data collection mapped and structured

This section maps the information collected from the eleven SQs, their corresponding Sub-SQs and the accompanying JC. For each JC, countries have been clustered into three groups:

- > Countries where there is **no information** to answer the JC.
- > Countries with information to answer the JC, but the **JC is not satisfied**.
- > Countries with information to answer the JC and the **JC is satisfied to various extent**.

5.2.1 SQ1: To what extent are the context and SWOT analysis based on recent evidence, and does it take into account experiences gained from implementing the CAP in previous programmes?

| Judgement Criteria (JQ) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|--|
| SQ1.1: To what extent are the context and SWOT analyses based on the current situation of the area covered by the CSP and give a comprehensive picture covering all the relevant information available in the Member States? | | | | |
| The <i>ex ante</i> evaluation reports confirm that the context and SWOT analyses are comprehensive, complete and coherent. Notably, the <i>ex ante</i> evaluation reports confirm that the SWOT is structured around each SO. (Art. 139) | (1) SE | | (27) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| The <i>ex ante</i> evaluation reports confirm that the context and SWOT analyses are specific, as indicated by the extent to which it considers specific requirements for certain objectives. (Art. 139) | (3) BE-WL, EE, SE | | (25) AT, BE-FL, BG, CY, CZ, DE, DK, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI, SK | |



| Judgement Criteria (JQ) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|---|--|
| SQL.2: To what extent is the context and SWOT analysis evidence-based and takes into account the lessons learned from previous implementations of the CAP? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the SWOT:</p> <ul style="list-style-type: none"> > is based on the most recent, relevant and reliable evidence, including but not limited to context indicators, analytical factsheets and relevant indicators coming from other European or national statistical sources. > Uses statistical sources on other relevant indicators such as the national statistical service, the FADN, the EEA databases, the Joint Research Centre (JRC) etc., and if these sources are referenced. > is based on solid evidence and conclusions from published studies, evaluations and sectoral analyses. | (4) BE-WL, FI, RO, SE | | (24) AT, BE-FL, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| <p>The <i>ex ante</i> evaluation reports confirm that the SWOT analyses consider lessons learned from previous experience across all CAP instruments covered by the CSP (experiences at EU, national and regional levels) and if these considerations are documented or referenced. (Art. 139)</p> | (10) AT, BE-FL, BE-WL, FI, FR, MT, NL, RO, SE, SI | (1) PT | (17) BG, CY, CZ, DE, DK, EE, EL, ES, HR, HU, IE, IT, LT, LU, LV, PL, SK | |
| SQL.3: To what extent are data gaps identified by the SWOT? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that:</p> <ul style="list-style-type: none"> > the SWOT clearly identified data gaps. > when quantitative data gaps were identified, the SWOT analyses were based on qualitative information or proxy data. | (10) BE-FL, BE-WL, CZ, FI, IE, LU, NL, PT, RO, SE | | (18) AT, BG, CY, DE, DK, EE, EL, ES, FR, HR, HU, IT, LT, LV, MT, PL, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |



5.2.2 SQ2: To what extent are the needs well defined, prioritised and based on evidence from the context and SWOT analysis?

| Judgement Criteria (JQ) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|--|---|---|---|
| SQ2.1: To what extent the assessment of needs is based on evidence and linked to the SWOT analyses? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that:</p> <ul style="list-style-type: none"> > the needs identified for each SO are clearly shown to be derived from the SWOT (e.g. through a matrix, or cross-reference). > the transition from SWOT to needs assessment is logical > the arguments justifying that the assessment of needs is based on the SWOT are valid and plausible. | | (1) BE-WL | (27) AT, BE-FL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK | MS <i>ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ2.2: To what extent are the needs prioritised by SOs following a consistent and sound methodology? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that:</p> <ul style="list-style-type: none"> > the methodology resulting to the prioritisation of needs is clear and sound, e.g. the use of evaluation criteria, scoring weights, etc. > how prioritised needs were linked to SOs. (Art. 139) | (3) EE, MT, SE | (3) BE-WL, FR, SK | (22) AT, BE-FL, BG, CY, CZ, DE, DK, EL, ES, FI, HR, HU, IE, IT, LT, LU, LV, NL, PL, PT, RO, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ2.3: To what extent are the identified needs comprehensive, specific and complete and take into account lessons learned from past programming periods? | | | | |
| The <i>ex ante</i> evaluation reports confirm that all needs, irrespective of whether they are addressed by the CSP or not, are included. (Art. 139) | (4) BE-WL, BG, FI, RO | (1) LU | (23) AT, BE-FL, CY, CZ, DE, DK, EE, EL, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, SE, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| The <i>ex ante</i> evaluation reports confirm that clear explanations of why an identified need is not addressed by the CSP are provided. | (9) BE-WL, BG, DE, EE, EL, FI, LU, RO, SE | (2) FR, IT | (17) AT, BE-FL, CY, CZ, DK, ES, HR, HU, IE, LT, LV, MT, NL, PL, PT, SI, SK | |
| The <i>ex ante</i> evaluation reports confirm that the national, regional and local specific needs were addressed and also took into account the specific needs of specific geographic areas. (Art. 139) | (8) AT, CY, CZ, DE, EE, FI, LU, SE | (1) RO | (19) BE-FL, BE-WL, BG, DK, EL, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, SI, SK | |



| Judgement Criteria (JQ) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|---|--|
| SQ2.3: To what extent are the identified needs comprehensive, specific and complete and take into account lessons learned from past programming periods? | | | | |
| The <i>ex ante</i> evaluation reports confirm that the assessment of needs addressed the national environmental and climate plans emanating from the legislative acts listed in Annex XIII. | (12) AT, BE-WL, DE, EE, FI, IT, LU, LV, RO, SE, SI, SK | (1) CZ | (15) BE-FL, BG, CY, DK, EL, ES, FR, HR, HU, IE, LT, MT, NL, PL, PT | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| The <i>ex ante</i> evaluation reports confirm that, where available, the assessment of data needs was disaggregated by gender. | (24) AT, BE-FL, BE-WL, BG, CY, CZ, DK, EE, EL, ES, FI, FR, HR, IE, IT, LU, LV, NL, PL, PT, RO, SE, SI, SK | | (4) DE, HU, LT, MT | |
| The <i>ex ante</i> evaluation reports confirm that lessons learned from previous programming periods in needs prioritisation are documented and referenced. | (18) AT, BE-FL, BE-WL, CY, DE, EE, EL, FI, FR, LV, MT, NL, PL, PT, RO, SE, SI, SK | (1) HR | (9) BG, CZ, DK, ES, HU, IE, IT, LT, LU | |
| SQ2.4: To what extent do the needs assessments refer to “an assessment of needs in relation to a fairer distribution and more effective and efficient targeting of direct payments, where relevant taking into account their farm structure, and in relation to risk management” as cited in Article 108(c) of Regulation (EU) 2021/2115? | | | | |
| The <i>ex ante</i> evaluation reports confirm that the needs assessment: <ul style="list-style-type: none"> > recognises the need for a fairer distribution of direct payments > considers the distribution mechanisms of direct payments in terms of effectiveness, efficiency and fairness. > takes into account farm structures, where and when relevant. > takes into account risk management when assessing the need for a fairer distribution of direct payments. (Art. 139) | (14) BE-WL, CZ, ES, FI, FR, HU, IT, LT, LU, MT, PT, RO, SE, SK | (1) EE | (13) AT, BE-FL, BG, CY, DE, DK, EL, HR, IE, LV, NL, PL, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |



5.2.3 SQ3: To what extent is the use of financial instruments financed by the EAFRD justified?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|--|---|--|--|
| SQ3.1: To what extent is the use of financial instruments to implement the CSP interventions justified and supported by relevant evidence? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the evidence justifying the use or non-use of financial instruments provided in the CSP is included in:</p> <ul style="list-style-type: none"> > the SWOT. > the assessment of needs. > the context indicators related to the socio-economic status of potential beneficiaries, the Member State's 'Study on financial needs in the agriculture and agri-food sectors in 24 EU Member States', and their national data or studies. (Art. 139) | (7) AT, BE-WL, DE, DK, FI, HU, LU | (4) BE-FL, FR, IE, NL | (17) BG, CY, CZ, EE, EL, ES, HR, IT, LT, LV, MT, PL, PT, RO, SE, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ3.2: To what extent are the planned financial instruments' definitions, type and main conditions, complete and consistent? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the CSP:</p> <ul style="list-style-type: none"> > describes the proposed instrument, including the type of implementation (loans, guarantees and/or equity), financial products' main characteristics and common elements to all interventions with financial instruments such as general cumulation rules, no double funding rules etc. > defines the applicable support rates, target groups (recipients) and the prioritisation of certain groups if applicable, for example, small farmers, young farmers, etc., > defines the eligibility conditions and eligible expenditure set, > lays down the combination permitted with interest rate or guarantee fee subsidy, describes any use of technical support and any restrictions on support for certain businesses or activities. > uses financial instruments that are consistent with, or complementary to, the grant scheme(s) supported by the CSP. | (19) AT, BE-FL, BE-WL, CY, CZ, DE, DK, ES, FI, HR, HU, IE, IT, LU, MT, NL, PT, RO, SI | (1) BG | (8) EE, EL, FR, LT, LV, PL, SE, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|--|---|---|---|
| SQ3.3: To what extent do the CSP contributions to InvestEU, as detailed in Article 81 of Regulation (EU) 2021/2115, justified and supported by relevant evidence? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that:</p> <ul style="list-style-type: none"> > the justification provided is based on evidence and is in line with the national and/or regional needs. > the expected contribution of InvestEU to the achievement of the policy objectives under the CSPs. | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LU, LV, MT, NL, PT, RO, SE, SI, SK | (1) PL | (1) LT | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |

5.2.4 SQ4: To what extent do the designed interventions respond to the identified national and regional needs?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|---|
| SQ4.1: To what extent do the CSPs include, for each SO, a sound and documented intervention logic? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the intervention logic shows or describes how the different types of interventions (Art.16, Chap III, Art.69), and conditionality, including their eligibility criteria and definitions, contribute to the SO to ensure significant positive impacts. (Art. 139)</p> | | (1) LU | (27) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, SK | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |
| SQ4.2: To what extent do the designed interventions under each SO address the national, regional and local needs, and potentials for development that were identified in the SWOT analysis and the assessment of needs? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the designed interventions under each SO present a well-documented and evidence-based causal link with identified needs. (Art. 139)</p> | | (1) LU | (27) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, SK | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|---|---|---|--|
| SQ4.3: To what extent have the lessons learned from past implementation periods been taken into account when designing the CSP intervention strategy? | | | | |
| The <i>ex ante</i> reports confirm whether the lessons learned from addressing national/regional needs with past interventions under Pillar I and Pillar II, their eligibility conditions and definitions have been considered when designing the intervention strategy and whether these are documented or referenced in the CSP. (Art. 139) | (10) AT, BE-WL, CY, DE, EL, FI, FR, IT, MT, PT | | (18) BE-FL, BG, CZ, DK, EE, ES, HR, HU, IE, LT, LU, LV, NL, PL, RO, SE, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |

5.2.5 SQ5: To what extent are the CSP interventions, their eligibility conditions, definition and conditionality requirements consistent with each other and work in synergy to achieve the objectives coherently?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|---|
| SQ5.1: To what extent are the CSP interventions coherent? | | | | |
| The <i>ex ante</i> evaluation reports confirm that there is consistency, synergy and balance between interventions: <ul style="list-style-type: none"> > supporting the same objective (e.g. GHG emission reductions with complementary action from eco-schemes, agri-environment climate commitments, investments, knowledge exchange and others). > addressing multiple SOs, e.g. an intervention addressing soil erosion under SO5 also serves the objective of increased SOC under SO4. > addressing the CCO. (Art. 139) | | | (28) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC MS SEA Report |
| SQ5.2: To what extent are the CSP's interventions and their eligibility conditions consistent with the GAEC standards and definitions to achieve objectives? | | | | |
| The <i>ex ante</i> evaluation reports confirm that: <ul style="list-style-type: none"> > the relevant interventions are consistent with the relevant GAEC standards. > the consistency of interventions to the GAEC standards contributes to the achievement of spatial targets or specific conservation targets for agricultural physical resources, i.e. soil and water. | (9) AT, BE-WL, CZ, EL, ES, IT, LT LV, MT | (1) HU | (18) BE-FL, BG, CY, DE, DK, EE, FI, FR, HR, IE, LU, NL, PL, PT, RO, SE, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC MS SEA Report |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|---|---|---|--|
| SQ5.3: To what extent are the lessons learned on coherence taken into account in designing the interventions from past programming periods? | | | | |
| The <i>ex ante</i> evaluation reports confirm that the CSPs make explicit reference to previous experiences to justify choices in the design of the interventions which support internal coherence. | (12) AT, BE-WL, BG, CY, DE, EL, FI, FR, IT, NL, PT, SE | | (16) BE-FL, CZ, DK, EE, ES, HR, HU, IE, LT, LU, LV, MT, PL, RO, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |

5.2.6 SQ6: To what extent are the allocated budgetary resources consistent with the CSPs' SOs and CCOs?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|--|---|---|--|
| SQ6.1: To what extent are the allocation of budgetary resources for each intervention justified by the assessment of needs? | | | | |
| The <i>ex ante</i> evaluation reports confirm that: <ul style="list-style-type: none"> > the criteria used for allocating budgetary resources to the interventions in the CSP were clear and robust; > the allocation of budgetary resources reflected the prioritisation of needs and the intervention logic (Art. 139). | (3) BE-WL, FR, LU | (2) SK, PT | (23) AT, BE-FL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IE, IT, LT, LV, MT, NL, PL, RO, SE, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ6.2: To what extent are the allocation of budgetary resources and the assigned unit costs to each intervention consistent with the targets set in the CSP? | | | | |
| The <i>ex ante</i> evaluation reports confirm that: <ul style="list-style-type: none"> > there is a clear link between the financial allocations (inputs) and expected outputs, results and calculated target values/milestones for the result indicators; > the unit amount per intervention is adequate to ensure the level of uptake which would support the attainment of the set target; > for voluntary interventions based on income foregone, the estimation of the unit amount is based on a clear methodology (Art. 139). | (4) BE-WL, FI, LU, SE | | (24) AT, BE-FL, BG, CY, CZ, DE, DK, EE, EL, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|---|--|
| SQ6.3: If applicable, to what extent do the <i>ex ante</i> reports examine if the proposed transfers of allocated budgetary resources between direct payments, sectoral types of interventions and types of interventions for rural development clearly stated and justified in the financial plan? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that:</p> <ul style="list-style-type: none"> > any transfer of allocated budgetary resources between direct payments, sectoral types of interventions and types of interventions for rural development is justified. | (19) AT, BE-FL, BE-WL, BG, CY, CZ, DE, EE, ES, FI, FR, HR, IE, LU, MT, RO, SE, SI, SK | (1) PL | (8) DK, EL, HU, IT, LT, LV, NL, PT | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ6.4: To what extent are lessons learned concerning the financial allocations from past programmes mentioned (size of budget and adoption rates of specific interventions) and used to justify decisions for the budget of the CSPs? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that previous experiences were recognised and referenced to justify choices for budget allocation (making direct reference to forecasted adoption rates, and incurred cost or income forgone and enforcement).</p> | (10) AT, BE-WL, DE, FI, HR, IT, LU, PL, PT, SK | | (18) BE-FL, BG, CY, CZ, DK, EE, EL, ES, FR, HU, IE, LT, LV, MT, NL, RO, SE, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |

5.2.7 SQ7: To what extent are the CSPs coherent with other policies, including but not limited to EU, national and regional policies?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|---|---|
| SQ7.1: To what extent are the CSPs complementary to the policies expressed through the legislative acts of Annex XIII of the Regulation? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that:</p> <ul style="list-style-type: none"> > the CSPs contain interventions that contribute to the Annex XIII policies (e.g. NAPs, Prioritised Action Framework, River Basin Management plans etc.); > specific conditions are considered in the design of GAEC standards and interventions to account for identified threats from agricultural activities as included in the plans of Annex XIII policies (e.g. River Basins, Natura 2000 sites, etc.) (Art. 139). | (5) BE-WL, CZ, DE, FI, LU | (1) EL | (22) AT, BE-FL, BG, CY, DK, EE, ES, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC MS SEA Report |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|--|
| SQ7.2: To what extent are the CSPs' interventions coherent with other relevant policies? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm the coherence of the CSPs with:</p> <ul style="list-style-type: none"> > all relevant strategic policy objectives (e.g. EU treaties, international treaties, EU strategies); > other relevant EU/ESI funds supported programmes/interventions (e.g. regional development programmes, environmental programmes); > all relevant national and regional policies and instruments. <p>The <i>ex ante</i> evaluation reports confirm that some of the identified needs are addressed by policies outside the CSPs and that these policies serve them (Art. 139).</p> | | (2) LU, SK | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> <p>MS SEA Report</p> |
| <p>The <i>ex ante</i> evaluation reports confirm that if there are negative trade-offs between the CSP and other relevant policies, they are compensated for or mitigated.</p> | | (2) LU, SK | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI | |
| <p>The <i>ex ante</i> evaluation confirms potential overlaps or funding gaps between relevant policy instruments and interventions and confirm that the CSPs provide a clear overview of the demarcation between the CSP, and other interventions funded by other EU funds.</p> | | (2) LU, SK | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI | |
| SQ7.3: To what extent are the lessons learned concerning the external coherence of interventions financed by EAGF and EAFRD from the past programming period taken into consideration by the CSPs? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the CSPs mention and refer to previous experiences to justify choices enforcing external coherence.</p> | (18) AT, BE-FL, BE-WL, BG, CY, DE, EL, FI, FR, HR, IE, IT, LU, LV, MT, NL, SE, SK | | (10) CZ, DK, EE, ES, HU, LT, PL, PT, RO, SI | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |



5.2.8 SQ8: To what extent will the expected outputs contribute to results expressed in appropriate and realistic quantified targets and milestones, taking into account the foreseen support from the EAGF and EAFRD?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|--|
| SQ8.1: To what extent are targets realistically set for each relevant result indicator? | | | | |
| The <i>ex ante</i> evaluation reports confirm that each intervention is clearly linked to one or more result indicators (Art. 139). | (1) SK | (1) SE | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| The <i>ex ante</i> evaluation reports confirm that: <ul style="list-style-type: none"> > assumptions to estimate the output values are clearly outlined and validated. > assumptions to estimate the result targets are clearly outlined and validated (Art. 139). | (1) SK | (1) SE | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI | |
| The <i>ex ante</i> evaluation reports confirm that target values are justified by: <ul style="list-style-type: none"> > taking into account critical factors; > are in line with the assessment of needs; > the financial allocation is consistent with expected target values; > the utilisation of reliable data sources; > external factors which may have positive or negative effects on results and impacts. | (1) SK | (1) SE | (26) AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI | |
| SQ8.2: To what extent are the annual milestones suitable for each relevant result indicator? | | | | |
| The <i>ex ante</i> evaluation reports confirm that: <ul style="list-style-type: none"> > milestones are based on the designed interventions linked to the corresponding result indicator; > Differences in annual milestone values are clearly explained (Art. 139). | (12) AT, BE-FL, BE-WL, BG, CY, DE, EE, EL, FI, FR, LT, LU | (4) CZ, NL, SE, SK | (12) DK, ES, HR, HU, IE, IT, LV, MT, PL, PT, RO, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| The <i>ex ante</i> evaluation reports confirm that: <ul style="list-style-type: none"> > specific risks that may influence the attainment of the milestones are identified; > internal and external factors which determine the absorption of funds are considered in the creation of the milestones. | (17) AT, BE-FL, BE-WL, BG, CY, CZ, DE, EE, EL, FI, FR, IE, IT, LT, LU, MT, SE | (2) NL, SK | (9) DK, ES, HR, HU, LV, PL, PT, RO, SI | |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|--|
| SQ8.2: To what extent are the annual milestones suitable for each relevant result indicator? | | | | |
| The <i>ex ante</i> evaluation reports confirm that financial commitments continuing from the 2014-2022 programming period are taken into account. | (20) AT, BE-FL, BE-WL, BG, CY, CZ, DE, EE, EL, ES, FI, FR, HR, IT, LU, LV, MT, SE, SI, SK | (1) NL | (7) DK, HU, IE, LT, PL, PT, RO | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ8.3: To what extent are the lessons learned from the past implementation periods of similar interventions and their implementation profile considered when setting up milestones? | | | | |
| The <i>ex ante</i> evaluation reports confirm that lessons learned from the past programming period are reflected in: <ul style="list-style-type: none"> > the estimation of the result targets; > the distribution value of the set milestones (for instance the values of the milestones show that MAs expect an adoption curve of the intervention in 'S' shape); > the volume of absorption of funds by potential beneficiaries across the implementation period for specific interventions. | (13) AT, BE-FL, BE-WL, BG, CY, DE, EL, FR, HR, IT, LU, NL, SE | (2) CZ, SK | (13) DK, EE, ES, FI, HU, IE, LT, LV, MT, PL, PT, RO, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |
| SQ8.4: To what extent do the <i>ex ante</i> reports refer to the potential impact of the CSPs? | | | | |
| The <i>ex ante</i> reports indicate the potential contribution (or absence) of the CSP towards the impact indicators: <ul style="list-style-type: none"> > quantitative assessment towards the impact indicators; > contribution of CSP towards set national targets (voluntary or national legally binding targets). | (15) AT, BE-WL, BG, CZ, DE, EE, EL, FI, FR, IT, MT, NL, PL, SE, SI | (4) BE-FL, ES, IE, LU | (9) CY, DK, HR, HU, LT, LV, PT, RO, SK | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC |



5.2.9 SQ9: To what extent has the CSP foreseen measures to reduce the administrative burden on farmers and other beneficiaries?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|---|---|
| SQ9.1: To what extent does the design of the policy and interventions, including throughout the different steps of the policy cycle, support the simplification of the CSPs? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the interventions and elements common to several interventions contribute to the simplification for farmers and other beneficiaries by looking, amongst others, at the following elements:</p> <ul style="list-style-type: none"> > the design of policy and interventions, and throughout the different steps of the policy cycle, are well described, consistent and non-contradictory; > the number of interventions in total and with a specific focus on the Green Architecture (GAEC standards, eco-schemes, environment and climate intervention) is adequate, not extremely fragmented nor consolidated, and does not trigger unnecessary complexities for implementation and monitoring; > eligibility conditions are adequate, well justified, non-contradictory and easy to implement in view of achieving the objectives of the interventions; > definitions provided in the CSPs consider simplification and reduction of administrative burden (Art. 139). | | | <p>[28] AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU LV, MT, NL, PL, PT, RO, SE, SI, SK</p> | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |
| SQ9.2: To what extent are the CSPs promoting simplification and reduction of administrative burden through digital application systems? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that measures were taken to reduce administrative burden using various digital application systems.</p> | <p>(1) SE</p> | | <p>[27] AT, BE-FL, BE-WL, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, SE, SI, SK</p> | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |
| SQ9.3: To what extent are simplifications in IACS controls reflected in the CSPs? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm whether simplification in IACS application and controls procedures are reflected in:</p> <ul style="list-style-type: none"> > whether remote sensing and/or AMS are used for controls of eligibility conditions and conditionality; > other technologies than remote sensing/Copernicus Sentinel data are used for control (e.g. geotagged photos). | <p>(4) CY, EE, HU, SE</p> | | <p>[24] AT, BE-FL, BE-WL, BG, CZ, DE, DK, EL, ES, FI, FR, HR, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SI, SK</p> | |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|--|---|--|---|
| SQ9.4: To what extent are simplifications in non-IACS applications and control procedures reflected in the CSPs? | | | | |
| <p>The <i>ex ante</i> evaluation reports examine if simplification in non-IACS application and control procedures are reflected in:</p> <ul style="list-style-type: none"> > the use of simplified cost options to an adequate extent; > the use of other technologies (e.g. geo-tagged photos and videos) to verify the selection, eligibility and completion of an operation/investment | (8) BE-FL, BE-WL, CY, CZ, LU, LV, PT, SE | | (20) AT, BG, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, MT, NL, PL, RO, SI, SK | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |
| SQ9.5: To what extent do the CSPs envisage the introduction of other solutions to achieve simplification and a reduction of administrative burden on farmers and other beneficiaries? | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm actions, other than those referred to above, which are taken to address simplification and reduction of administrative burden for final beneficiaries. These may refer to alert systems notifying farmers of deadlines, non-compliances, etc. Other solutions may be innovative or unique to the Member State.</p> | (8) BE-FL, BE-WL, CY, CZ, LU, LV, PT, SE | | (20) AT, BG, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, MT, NL, PL, RO, SI, SK | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |

5.2.10 SQ10: To what extent do the CSPs show their commitment towards contributing to the Green Deal objectives, including the Farm to Fork Strategy and Biodiversity Strategy?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|---|
| SQ10.1: To what extent do the CSPs reflect on intended contributions towards the selected EU-level targets arising from the Farm to Fork Strategy and Biodiversity Strategy? | | | | |
| <p>For some or all the Green Deal targets, the <i>ex ante</i> evaluation reports confirm that the CSPs explicitly provide a sound explanation of how the GAECs and SMRs support the achievement of national Green Deal values.</p> | (10) CY, CZ, EL, FI, FR, HR, LU, PL, SE, SI | (1) SK | (17) AT, BE-FL, BE-WL, BG, DE, DK, EE, ES, HU, IE, IT, LT, LV, MT, NL, PT, RO | <p><i>Ex ante</i> evaluation report</p> <p>Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC</p> |
| <p>For some or all the Green Deal targets, the <i>ex ante</i> evaluation reports confirm that the CSPs explicitly provide a sound explanation of how the eco-schemes and environmental, climate-related, and other management commitments support the achievement of Green Deal national values.</p> | (11) CY, DE, EE, EL, FI, FR, LU, PL, PT, SE, SK | | (17) AT, BE-FL, BE-WL, BG, CZ, DK, ES, HR, HU, IE, IT, LT, LV, MT, NL, RO, SI | <p>MS SEA Report</p> |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|--|---|
| SQ10.1: To what extent do the CSPs reflect on intended contributions towards the selected EU-level targets arising from the Farm to Fork Strategy and Biodiversity Strategy? | | | | |
| For some or all the Green Deal targets, the <i>ex ante</i> evaluation reports confirm that the CSPs explicitly provide a sound explanation of how other interventions (investments, training, etc.) support the national Green Deal values. | (15) CY, DE, EE, EL, ES, FI, FR, HR, HU, LU, NL, PL, PT, SE, SK | | (13) AT, BE-FL, BE-WL, BG, CZ, DK, IE, IT, LT, LV, MT, RO, SI | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC MS SEA Report |
| For some or all the Green Deal targets, the <i>ex ante</i> evaluation reports confirm that the CSPs explicitly provide a sound explanation of how the <i>ex ante</i> evaluation reports identified shortcomings in support of the CSP to the national Green Deal values. | (13) BE-WL, CY, CZ, DE, EE, FI, FR, HR, LU, NL, PL, PT, SE | (3) EL, MT, SK | (12) AT, BE-FL, BG, DK, ES, HU, IE, IT, LT, LV, RO, SI | |
| SQ10.2: To what extent do the CSPs set non-legally binding national values to reflect selective targets set out in the Farm to Fork Strategy and Biodiversity Strategy? | | | | |
| The CSP contains national values for the % reduction by 2030 in the use and risk of pesticides. | (16) AT, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HU, PL, RO, SE, SI, SK | (4) IE, IT, MT, PT | (8) BE-FL, BE-WL, BG, HR, LT, LU, LV, NL | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC MS SEA Report |
| The CSP contains national values for the % reduction in nutrient loss by 2030. | (19) AT, BE-WL, CY, CZ, DE, EE, EL, ES, FI, FR, HR, HU, LU, MT, PL, RO, SE, SI, SK | (2) IT, PT | (7) BE-FL, BG, DK, IE, LT, LV, NL | |
| The CSP contains national values for the % of UAA under organic rules by 2030. | (14) AT, CY, CZ, DE, EE, EL, ES, FI, HR, HU, PL, RO, SI, SK | (3) MT, NL, PT | (11) BE-FL, BE-WL, BG, DK, FR, IE, IT, LT, LU, LV, SE | |
| The CSP contains national values for the % of UAA under high diversity agricultural features by 2030. | (20) AT, BE-WL, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, LU, MT, PL, RO, SE, SI, SK | (3) IE, IT, PT | (5) BE-FL, BG, LT, LV, NL | |
| The CSP contains national values for the % reduction in the use of anti-microbials by 2030. | (21) AT, BE-FL, BE-WL, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, LU, NL, PL, RO, SE, SI, SK | (4) IE, IT, MT, PT | (3) BG, LT, LV | |
| | | | | |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|--|--|---|---|---|
| SQ10.2: To what extent do the CSPs set non-legally binding national values to reflect selective targets set out in the Farm to Fork Strategy and Biodiversity Strategy? | | | | |
| The CSP contains national values for the % coverage by fast broadband internet by 2025. | (20) AT, BE-FL, BE-WL, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HU, LU, MT, NL, PL, RO, SI, SK | (2) IE, IT | (6) BG, HR, LT, LV, PT, SE | <i>Ex ante</i> evaluation report Annex I to the CSPs on the <i>ex ante</i> evaluation and the SEA referred to in Directive 2001/42/EC MS SEA Report |

5.2.11 SQ11: To what extent do the CSPs' environmental and climate architecture contribute to achieving environmental and climate ambition?

| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|---|---|--|--|
| SQ11.1: To what extent do the CSPs' green architecture provide evidence of increased climate ambition through their overall contribution to climate mitigation and adaptation? | | | | |
| The <i>ex ante</i> evaluation reports confirm that the CSPs set out a higher ambition for GHG emission reduction, carbon removals and the adoption of interventions for the short- and long-term adaptation of the sector resulting from area-funded and conditionality as well as non-area funded interventions. | (7) EL, FI, HR, HU, IE, IT, PL | (4) CY, LV, PT, SE | (17) AT, BE-FL, BE-WL, BG, CZ, DE, DK, EE, ES, FR, LT, LU, MT, NL, RO, SI, SK | MS <i>ex ante</i> evaluation report MS SEA Report |
| The <i>ex ante</i> evaluation reports confirm that the CSPs make direct reference to targets set by and interventions recommended by the NECPs and the NAPs. | (1) BE-WL, CY, FI, FR, HR, LU, SE | (5) EL, LV, PT, RO, SK | (16) AT, BE-FL, BG, CZ, DE, DK, EE, ES, HU, IE, IT, LT, MT, NL, PL, SI | |
| The <i>ex ante</i> evaluation reports confirm that the CSPs quantify forecasts for decreased GHG emissions from agriculture or increased removals from LULUCF, increased energy production from renewables and increased energy efficiency. | (11) AT, BE-WL, CY, EE, FR, HR, IT, LU, MT, PL, SE | (4) EL, FI, LV, RO | (13) BE-FL, BG, CZ, DE, DK, ES, HU, IE, LT, NL, PT, SI, SK | |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|---|---|---|--|
| SQ11.2: To what extent do the CSPs' green architecture provide evidence for increased environmental ambition through their overall contribution to water, soil and air protection, conservation and sustainable management? | | | | |
| The <i>ex ante</i> reports confirm that the CSPs set out a higher ambition for ammonia reductions, nutrient management, water quality, reduced pesticides and increased soil organic carbon due to area-funded and conditionalities and due to non-area-funded interventions. | (10) BE-WL, CY, CZ, FI, HU, IE, IT, PL, PT, SE | (5) EL, FR, HR, LV, SK | (13) AT, BE-FL, BG, DE, DK, EE, ES, LT, LU, MT, NL, RO, SI | MS <i>ex ante</i> evaluation report MS SEA Report |
| The <i>ex ante</i> reports confirm that the CSPs are committed to a higher protection of soils at risk of erosion. | (9) CY, CZ, EE, FI, IE, IT, PL, SE, SI | (6) EL, FR, HR, NL, PT, SK | (13) AT, BE-FL, BE-WL, BG, DE, DK, ES, HU, LT, LU, LV, MT, RO | |
| The <i>ex ante</i> reports confirm that the CSPs, in order to justify increased spatial targeting or the introduction of specific measures, make direct reference to the action and management plans for river basins, nitrate vulnerable zones, desertification strategy, flood risk management, etc. | (13) AT, BE-WL, CY, CZ, DE, EE, FI, LU, PT, RO, SE, SI, SK | (2) EL, HR | (13) BE-FL, BG, DK, ES, FR, HU, IE, IT, LT, LV, MT, NL, PL | |
| The <i>ex ante</i> reports confirm that the CSPs quantify targets and forecasts for ammonia reductions, nutrient management, water quality, reduced pesticides and increased soil carbon. | (13) AT, BE-WL, CY, CZ, DE, EE, FI, LU, PT, RO, SE, SI, SK | (2) EL, HR | (13) BE-FL, BG, DK, ES, FR, HU, IE, IT, LT, LV, MT, NL, PL | |
| The <i>ex ante</i> reports confirm that the CSPs channel increased spending to irrigation water savings. | (16) AT, BE-WL, CY, EE, EL, FI, FR, HR, HU, IT, LU, LV, NL, PL, RO, SE | (1) SK | (11) BE-FL, BG, CZ, DE, DK, ES, IE, LT MT, PT, SI | |
| SQ11.3: To what extent do the CSPs' green architecture provide evidence for increased ambition in providing biodiversity and ecosystem services through its overall contribution to environmental conservation? | | | | |
| The <i>ex ante</i> reports confirm that the CSPs set out a higher ambition for the protection of biodiversity resources, preserving habitats and species, increasing area with landscape features and the supply of ecosystem services more extensively and ambitiously than in the previous programming period due to area-funded and conditionalities and due to non-area funded interventions. | (10) BE-WL, CY, CZ, DK, EL, FI, IE, IT, PL, SK | (2) RO, SE | (16) AT, DE, EE, ES, HR, HU, LU, MT, BE-FL, BG, FR, LT, LV, NL, PT, SI | MS <i>ex ante</i> evaluation report MS SEA Report |



| Judgement Criteria (JC) | Countries with no information to answer the JC | Countries where the JC is not satisfied | Countries where the JC is satisfied to various extent | Data source |
|---|--|---|--|--|
| SQL1.3: To what extent do the CSPs' green architecture provide evidence for increased ambition in providing biodiversity and ecosystem services through its overall contribution to environmental conservation? | | | | |
| The <i>ex ante</i> reports confirm that the CSPs increase the spatial targeting or introduce specific measures, and make direct reference to targets and measures included in the Biodiversity strategy or the Prioritised Action Frameworks of Natura 2000 areas, the NAPs, etc. | (9) AT, BE-WL, CY, CZ, EE, EL, FI, RO, SE | (3) MT, PT, SK | (16) WL, BG, DE, DK, ES, FR, HR, HU, IE, IT, LT, LU, LV, NL, PL, SI | MS <i>ex ante</i> evaluation report MS SEA Report |
| The <i>ex ante</i> reports confirm that the CSPs contain an integrated approach to agricultural and forest land within Natura 2000 areas that target more beneficiaries and covers a more significant extent of the Natura 2000 area. | (16) AT, CY, CZ, DE, EE, EL, ES, FI, HR, HU, IT, LU, LV, MT, RO, SE | (1) SK | (11) BE-FL, BE-WL, BG, DK, FR, IE, LT, NL, PL, PT, SI | |

5.3 Annex 3 – Example of screening tool for SQ1

5.3.1 SQ1: To what extent is the context and SWOT analysis based on recent evidence, and does it take into account experiences gained from implementing the CAP in previous programmes?

Understanding of the question

The purpose of this SQ is to determine whether the *ex ante* evaluation confirms that the context and SWOT analyses used in the design of the CSPs are evidence-based. Therefore, the *ex ante* evaluation would need to conclude the following:

- > The SWOT was **comprehensive, complete, coherent, and specific**;
- > The SWOT was based on the most recent, relevant, and **reliable evidence**;
- > The SWOT considered **lessons learned** from previous experience; and
- > The SWOT identified and attempted to fill **data gaps**.



| Judgement Criteria | Indicative guidelines to the Judgement Criteria | <i>ex ante</i> Toolkit Number | Is there information in the <i>ex ante</i> evaluation report to answer the Judgement Criteria (JC)? (Yes/No) If «No», please move to the next row | According to the <i>ex ante</i> evaluation report, is the Judgement Criteria satisfied? (Yes/Partially/No) | Please provide direct summary from the relevant information sources | If the way the information is provided in the information sources allows it (information is not scattered across the sources), please copy and paste the relevant information in English using the automate Excel translation features, and indicate the reference of this information (e.g., paragraph X, page Y on Annex I Recommendations; or paragraph X, page Y in section Z of <i>ex ante</i> report) | If information is provided in a very indirect way and scattered across information sources, please provide reference to the information source (e.g., paragraph X, page Y on Annex I Recommendations; or paragraph X, page Y in section Z of <i>ex ante</i> report) | Additional comments from GEs |
|--|--|--|--|--|---|--|--|------------------------------|
| SQL1.1: To what extent are the context and SWOT analyses based on the current situation of the area covered by the CSP and give a comprehensive picture covering all the relevant information available in the Member States? | | | | | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the context and SWOT analyses are comprehensive, complete, and coherent. Notably, the <i>ex ante</i> evaluation reports confirm that the SWOT is structured around each specific objective.</p> | <p>The SWOT is considered to be comprehensive if:</p> <ul style="list-style-type: none"> › It is structured around each specific objective; and › It is based on the current situation of the area covered by the CSP. It gives a comprehensive picture covering all the relevant information available in the country (regional, national, European, and international). <p>The SWOT is considered to be complete if:</p> <ul style="list-style-type: none"> › It includes all relevant territorial, sectoral, economic, social, structural, and environmental information and trends; and › It takes into account the external shifts and trends that affect the CAP and the Member State (e.g., international commodity prices, primary input prices). <p>The SWOT is considered to be coherent if it makes a clear distinction between:</p> <ul style="list-style-type: none"> › Internal factors: strengths and weaknesses intrinsic to the agricultural sector and rural areas are identified and can be addressed directly via policy interventions; › External factors: opportunities and threats exogenous to the agricultural sector and rural areas are identified, and policy interventions are designed to reap the benefit from identified opportunities and mitigate risks associated with threats; › Strengths, weaknesses, opportunities, and threats are correctly and clearly formulated, with no contradictions; | Tool 2.1_GQ_1.1 | | | | | | |
| <p>The <i>ex ante</i> evaluation reports confirm that the context and SWOT analyses are specific, as indicated by the extent to which it considers specific requirements for certain objectives.</p> | <p>The SWOT is considered to be specific to the extent it considers specific requirements for certain objectives as follows:</p> <ul style="list-style-type: none"> › National and regional specificities have been reflected and analysed under the specific objectives for which they are relevant; and › Sectoral aspects have been analysed where relevant. | Tool 2.1_GQ_1.2 Tool 2.1_GQ_1.3 | | | | | | |



| Judgement Criteria | Indicative guidelines to the Judgement Criteria | ex ante Toolkit Number | Is there information in the ex ante evaluation report to answer the Judgement Criteria (JC)? (Yes/No) If «No», please move to the next row | According to the ex ante evaluation report, is the Judgement Criteria satisfied? (Yes/Partially/No) | Please provide direct summary from the relevant information sources | If the way the information is provided in the information sources allows it (information is not scattered across the sources), please copy and paste the relevant information in English using the automate Excel translation features, and indicate the reference of this information (e.g., paragraph X, page Y on Annex I Recommendations; or paragraph X, page Y in section Z of ex ante report) | If information is provided in a very indirect way and scattered across information sources, please provide reference to the information source (e.g., paragraph X, page Y on Annex I Recommendations; or paragraph X, page Y in section Z of ex ante report) | Additional comments from GEs |
|--|--|---------------------------------|---|---|---|---|---|------------------------------|
| SQL.2: To what extent is the context and SWOT analysis evidence-based and takes into account of lesson learned from previous implementations of the CAP? | | | | | | | | |
| The ex ante evaluation reports confirm that the SWOT: <ul style="list-style-type: none"> is based on the most recent, relevant, and reliable evidence, including but not limited to Context Indicators, analytical factsheets and relevant indicators coming from other European or national statistical sources. Uses statistical sources on other relevant indicators such as the national statistical service, the Farm Accountancy Data Network (FADN), the European Environment Agency databases, JRC, etc., and if these sources are referenced. is based on solid evidence and conclusions from published studies, evaluations, and sectoral analyses. | Reliable evidence is: <ul style="list-style-type: none"> Based on the most recent, relevant and evidence, especially all the Context Indicators (CIs) and indicators from the Performance Monitoring and Evaluation Framework (PMEF) the data used in the analytical factsheets and the Commission Policy Briefs and relevant indicators coming from Eurostat; Valid statistical sources based on other relevant indicators coming from other statistical data sources such as the national statistical service, the Farm Accountancy Data Network (FADN), the European Environment Agency databases, JRC, etc.; and Based on solid evidence and conclusions from published studies, evaluations, sectoral analysis and quality academic literature. | Tool 2.1.G.Q1.4 | | | | | | |
| The ex ante evaluation reports confirm that the SWOT analyses consider lessons learned from previous experience across all CAP instruments covered by the CSP (experiences at EU, national and regional level) and if these considerations are documented or referenced. | Lessons learned refer to recorded and analysed previous experience across all CAP instruments covered by the CSP (experiences at EU, national and regional levels) with relevant documentation and appropriate reference. | Tool 2.1.G.Q1.4 | | | | | | |
| SQL.3: To what extent are data gaps identified by the SWOT? | | | | | | | | |
| The ex ante evaluation reports confirm that: <ul style="list-style-type: none"> the SWOT clearly identified data gaps. when quantitative data gaps were identified, the SWOT analyses were based on qualitative information or proxy data. | Data gaps refer mainly, but not exclusively, to gaps in Context Indicators. These gaps may emerge because a Member State does not provide data for the specific indicator, because data are outdated, for example, due to planned programmed surveys, inventories, or late regular reporting. Data gaps may also emerge when the regional or sectoral dimensions of certain Context Indicators are considered. Data gap filling is the process by which the SWOT attempts to provide evidence for the gap by, for instance by using other qualitative sources of information (national data, survey, market information etc.), or using proxy data to provide an alternative indication in place of the missing observational data, etc. | Tool 2.1.G.Q1.4 | | | | | | |



5.4 Annex 4 – Analytical framework of the appraisal

5.4.1 Analytical framework for AQ1

| Assessment Criteria | Document source | Extraction tool |
|--|----------------------------------|---|
| AQ1.1: To what extent is the <i>ex ante</i> complete? | | |
| The <i>ex ante</i> evaluations have a clear structure ³³ . | <i>Ex ante</i> evaluation report | Screening tool – General question |
| Each section of the evaluation report has a clear focus ³⁴ , and the information finding is straightforward. | <i>Ex ante</i> evaluation report | Screening tool – General question |
| The <i>ex ante</i> evaluation is structured around SOs and/or evaluation steps. | <i>Ex ante</i> evaluation report | Screening tool – General question |
| The <i>ex ante</i> evaluation includes all relevant elements in Article 139 of Regulation (EU) 2021/2115. | <i>Ex ante</i> evaluation report | Screening tool – General questions and all SQs |
| AQ1.2: To what extent is the <i>ex ante</i> comprehensive and coherent? | | |
| The evaluation framework was developed in line with <i>ex ante</i> toolkit 7 (Tools 2.1, 2.2, 3.1 etc.) or referred to robust evaluation methodologies. | <i>Ex ante</i> evaluation report | Screening tool – All SQs except SQ10 |
| The methodology used for the <i>ex ante</i> evaluation (admin burden, prioritisation of needs, etc.) is well-detailed. | <i>Ex ante</i> evaluation report | Screening tool (SQ2.1, SQ2.3, SQ2.4, SQ9) |
| The <i>ex ante</i> evaluation goes further than CSP's LRs. For example, it takes the opportunity to incorporate all the recent external shifts and trends that have affected the agricultural sector (e.g. market disruptions due to the Ukrainian war). | <i>Ex ante</i> evaluation report | Focus groups with evaluators |
| AQ1.3: To what extent is the <i>ex ante</i> evaluation specific and considers the specific requirements for certain objectives? | | |
| National and regional specificities have been considered and reflected in the analysis. | <i>Ex ante</i> evaluation report | Screening tool (SQ1.1, SQ2.3, SQ3.3, SQ4, SQ7.2) Focus groups with evaluators (in case of data gaps) |
| The specific requirements related to Annex XIII legislation have been addressed. | <i>Ex ante</i> evaluation report | Screening tool (SQ 2.3 and 7.1) Focus groups with evaluators (in case of data gaps) |
| Key sectoral aspects have been analysed where relevant. | <i>Ex ante</i> evaluation report | Screening tool (SQ1.1, SQ1.2, SQ4.1, SQ6.3) Focus groups with evaluators (in case of data gaps) |
| The <i>ex ante</i> evaluation contains an analysis of issues related to agricultural income. | <i>Ex ante</i> evaluation report | Screening tool (SQ2.4) Focus groups with evaluators (in case of data gaps) |

³³ The structure of a report refers to the overall organisation, arrangement and presentation of the content in a report. It involves how the information is divided into sections, subsections and paragraphs, as well as the logical flow and sequence of ideas.

³⁴ The focus of a report refers to the subjects, themes or topics that the report addresses in the different sections. It is the central point around which a section revolves. A clear focus implies that the section is clear and specific, addressing a particular aspect or dimension of the broader topic. It leaves no room for ambiguity or misinterpretation. It should be easy to grasp and understand. The reader should be able to draw easily the main take away message.



| Assessment Criteria | Document source | Extraction tool |
|---|----------------------------------|--|
| AQ1.4: To what extent were the <i>ex ante</i> evaluations able to evaluate the contributions of the CSPs in achieving the SOs? | | |
| The <i>ex ante</i> report reflects on the unit amount per intervention in parallel to the overall financial envelope for the CAP intervention to achieve the SOs. | <i>Ex ante</i> evaluation report | Screening tool (SQ6.2) |
| The <i>ex ante</i> report identifies the extent to which external factors/ context indicators could influence the achievement of the target and potentially influence the achievement of the SOs. | <i>Ex ante</i> evaluation report | Screening tool (SQ1) |
| The <i>ex ante</i> report quantifies the potential impact of the CSP, especially in view of the achievement of the SOs. | <i>Ex ante</i> evaluation report | Screening tool (SQ8, SQ10, SQ11) Focus groups with evaluators |

5.4.2 Analytical framework for AQ2

| Assessment Criteria (AC) | Document source | Extraction tool |
|---|----------------------------------|---|
| AQ2.1: What was the process followed in conducting the <i>ex ante</i> evaluation? | | |
| Date of publication of the <i>ex ante</i> and date of revisions. | <i>Ex ante</i> evaluation report | Screening tool - General questions Focus groups with evaluators |
| Date of publication of the CSP. | CSPs | https://agriculture.ec.europa.eu/ |
| The <i>ex ante</i> evaluation was conducted following a multiple-phase approach. Starting with an evaluation of the SWOT and needs assessment, followed by an evaluation of the contribution to CAP strategic objectives, internal and external coherence, etc. | NA | Focus groups with evaluators MA Survey |
| An adequate amount of time was dedicated to each step of the process for conducting an <i>ex ante</i> evaluation. | NA | |
| Date of publication of the <i>ex ante</i> and date of revisions. | <i>Ex ante</i> evaluation report | Screening tool - General questions Focus groups with evaluators |
| AQ2.2: How did the <i>ex ante</i> evaluator interact with the MA? | | |
| The evaluators worked closely with the MA from the start of the design of the CSP. | NA | Focus groups with evaluators MA Survey |
| A dedicated and structured process for dialogue and feedback between MAs, stakeholders and evaluators was set up. | NA | |
| The evaluators' involvement was active and interactive in all the process stages (SWOT analysis, needs assessment, etc.). | NA | |
| The SEA experts (if different from evaluators) were engaged from the start of the CSP design phase. | NA | |



| Assessment Criteria (AC) | Document source | Extraction tool |
|---|-----------------|---|
| AQ2.3: How were key stakeholders involved in the process of the <i>ex ante</i> evaluation? | | |
| All relevant stakeholders were included in the process of the <i>ex ante</i> evaluation, which was inclusive and well-organised. | NA | Focus groups with evaluators MA Survey |
| When a structured feedback process was set up, it was operated smoothly and efficiently, and inputs and feedback were appropriately considered. | NA | |
| When no structured feedback process was set up, it did not hinder it, and inputs and feedback were appropriately considered. | NA | |

5.4.3 Analytical framework for AQ3

| Assessment Criteria | Document source | Extraction tool |
|--|---|--|
| AQ3.1: To what extent did the <i>ex ante</i> evaluation play a positive and constructive role in identifying contradictions, deficiencies, gaps, missing obligations, etc.? | | |
| <p>Recommendations have addressed the following issues:</p> <ul style="list-style-type: none"> ➢ completeness by highlighting gaps; ➢ coherence and relevance by pointing to possible contradictions and failures to address obligations; ➢ effectiveness by raising issues related to the feasibility of targets and milestones; ➢ efficiency by discussing issues pertinent to budget allocations. | Annex I Recommendations <i>Ex ante</i> evaluation report | Screening tool – General questions Focus groups with evaluators |
| AQ3.2: Which elements of the <i>ex ante</i> evaluation reports were the most useful in improving the CSPs? | | |
| Issues raised throughout the process of carrying out the <i>ex ante</i> evaluation were considered in consecutive revisions of the CSPs. | Annex I Recommendations <i>Ex ante</i> evaluation report | Focus groups with evaluators MA Survey |
| Recommendations, that have led to an update of the CSP, have addressed all SOs and recommendation category (proportionally to the number of recommendations provided). | Annex I Recommendations <i>Ex ante</i> evaluation report | |
| The engagement of the <i>ex ante</i> evaluation team was considered constructive and positive. | NA | |
| The CSPs were updated following the finalisation of the <i>ex ante</i> evaluation report. | NA | |



5.4.4 Analytical framework for AQ4

| Assessment Criteria | Document source | Extraction tool |
|--|-----------------|-----------------|
| AQ4.1: What are the good practices in terms of comprehensiveness and coherence of <i>ex ante</i> evaluation reports? | | |
| <i>Ex ante</i> evaluations have been a living process (<i>ex ante</i> reports have been updated in light of the changes made in the CSP). | Replies to AQ1 | EH assessment |
| Member States that developed and followed a strong evaluation framework for conducting the <i>ex ante</i> exercise. | | |
| Member State <i>ex ante</i> evaluation reports that clearly detail the methodological approach and the data sources. | | |
| Member State <i>ex ante</i> evaluation reports are based on qualitative and quantitative methodologies. | | |
| AQ4.2: What are the good practices in terms of considering national (and regional) specificities and specific requirements for the SOs? | | |
| Member States that considered the following aspects in the <i>ex ante</i> evaluation: <ul style="list-style-type: none"> > national (and regional) specificities; > key sectoral aspects; > issues related to agricultural income. | Replies to AQ2 | EH assessment |
| AQ4.3: What are good practices in terms of the process for carrying out the <i>ex ante</i> evaluation? | | |
| Member States that followed a multiphase approach to perform the <i>ex ante</i> evaluation. | Replies to AQ2 | EH assessment |
| Member States that performed the <i>ex ante</i> evaluation with an appropriate timing which was aligned with the drafting of the CSP. | | |
| AQ4.4: What are the good practices in terms of interaction between evaluators and MAs? | | |
| Member States in which evaluators and experts for the SEA (where different) cooperated closely with the MA from the start of the CSP design. | Replies to AQ2 | EH assessment |
| Member States that set up a dedicated structure for feedback and discussion involving evaluators, the MA and stakeholders (i.e. steering committee). | | |
| AQ4.5: What are the good practices in terms of stakeholder involvement? | | |
| Member States that involved relevant stakeholders in all processes of the <i>ex ante</i> evaluation. | Replies to AQ2 | EH assessment |
| Member States that created a dedicated structure for input and feedback (i.e. steering committee) and stakeholders' input and feedback were taken into account. | | |
| AQ4.6: What are the good practices in identifying constraints, gaps, etc., and how were those reflected in the CSPs? | | |
| Member States that clearly identified issues related to completeness, coherence and relevance, targets and milestones, and budget allocations and reflect them in the design of their CSP. | Replies to AQ3 | EH assessment |



| Assessment Criteria | Document source | Extraction tool |
|--|-----------------|-----------------|
| AQ4.7: In which Member States did the recommendations included in the <i>ex ante</i> evaluation contribute to shaping the CSP positively? | | |
| Member States where recommendations went beyond the minimum requirements, and reflected in the final versions of the CSPs. | Replies to AQ3 | EH assessment |

5.5 Annex 5 - Main conclusions from the focus group with the evaluators of the *ex ante* evaluations of CAP post 2020

5.5.1 AQ1: To what extent are the *ex ante* evaluation reports complete, comprehensive and coherent?

One of the main challenges faced by evaluators, highlighted during the focus group discussions, was that the EU legal framework was not yet finalised while the CSP was being drafted, and consequently, the *ex ante* evaluations were being conducted. As a result, some evaluators could not adapt to changes in the framework and were required to wait until its approval before undertaking intensive work. This challenge was experienced by several Member States, with most evaluators adopting a multiphase approach to the *ex ante* evaluation by focusing primarily on the SWOT and needs assessment and subsequently working on different chapters of the CSP as time progressed. However, some evaluators did not have the opportunity to review the final version of the CSP as submitted to the Commission, given that they worked on earlier versions of the CSP.

Several evaluators noted that the *ex ante* reports could be considered complete, comprehensive and coherent (CY, DE, IT, MT and SE). However, this would not have been possible if a parallel approach between the drafting of the CSP and its *ex ante* evaluation was not adopted, as the timeframe between the final version of the CSP and its submission was too short and would not have allowed for a comprehensive *ex ante*.

Did the *ex ante* evaluation incorporate recent external shifts and trends that have affected the agricultural sector?

In certain instances, the impact of COVID-19 required a revision to the priorities due to the increase in prices and disruption in the supply chain (MT).

Did the *ex ante* evaluation go beyond the LRs of CSPs?

While some evaluators adhered strictly to their respective terms of reference (ToR), often based on the LRs, which defined their mandate, and limited their analysis, others conducted the additional analysis. In most instances, an assessment of the potential impact of the CSP was not required (CY, DE, MT, NL, PL). However, in some instances (SE), the impact of the CSP on climate, biodiversity and various aspects of rural development was considered even though Green Deal targets were not referred to in the CSP regulation. Nevertheless, some challenges were faced, particularly with the lack of data to assess the benefits of specific initiatives from a climate perspective.

The use of the EH toolkit varied among evaluators. While their ToR required some to follow it (MT), others used it as a point of reference

and initial guidance and then adapted it as necessary. The toolkit was followed to the extent possible, but not all experts engaged in the *ex ante* evaluation used it to the same degree. The tool proved helpful for the SWOT and needs assessment but not for other aspects, mainly because it was developed before the approval of the regulation.

How were national and regional specificities considered and reflected in the analysis?

Regarding regional specificities, the SWOT analysis and the needs assessment were done at a national level but in consultation with regions (IT). The evaluators also verified that the regional aspects were sufficiently documented and explained within the interventions.

Were Annex XIII obligations considered and reflected in the *ex ante* evaluation?

In some instances, Annex XIII's obligations were part of the *ex ante* evaluation contract requirement (DE, SE).

How does the *ex ante* evaluation address issues relate to agricultural income?

Agricultural income was mainly considered as part of the SWOT analysis (DE, SE) with evaluations exploring how well income support is provided to address the SOs within the Common Strategic Framework.

Did the *ex ante* attempt to quantify the potential impact of the CSP, particularly with respect to the Green Deal?

Most participants in the focus groups did not analyse the contributions of the CSPs to the Green Deal ambitions (CY, DE, EE, LT, LU, MT, NL, PL, SE). This was due to multiple factors, such as the lack of reference to the Green Deal targets in the CSP, their ToR and the lack of LRs which did not require such an assessment. Additionally, evaluators highlighted the difficulties in linking the expected output and result indicator to impact indicators within the required time frame.

It was argued that the contribution of the CSP to the Green Deal ambitions should be based on quantitative evidence or ToC. While the CSP outlines specific output and result indicators related to its objectives, the absence of impact indicators makes it difficult to evaluate the CSP's contribution to the Green Deal goals. The evaluators also noted that achieving the Green Deal goals is not solely dependent on the agricultural sector. The CSP's goals are broader in scope and encompass environmental, economic and social objectives.



5.5.2 AQ2: To what extent was the *ex ante* evaluation conducted following an effective process?

What type of approach was used to conduct the *ex ante* evaluation?

Participants confirmed that a multiphase approach was adopted in most instances (AT, CY, LU, LV, MT, NL, SE), but eventually the CSP had to be considered in its total form to ensure consistency and synergies between the different sections (MT). The evaluators provided feedback during each stage, i.e. SWOT and needs, interventions and recommendations were provided on the methodology to help improve the quality of the CSP. For some countries, this process led to the submission of several reports covering the different phases. For instance, in Austria, 20 papers and 20 workshops were conducted. The submitted *ex ante* evaluation report is a summary of all these papers. In Austria, the *ex ante* evaluation was largely determined by the target group, which was the MA and the technical departments composed of about 60 or 70 individuals. This meant that the assessment was not undertaken at the level of the SO, but for specific themes within each SO reflecting Austria's organisation, thus leading to a significant amount of micro-assessments.

Was adequate time allocated to each step of the process?

One of the main challenges in this regard was the time taken for negotiations, discussions and changes to the regulation, which led to reduced timing for conducting the evaluation. In general, there was a significant time to conduct the SWOT analysis and the needs assessment, but not much time to evaluate the interventions, the budget and the indicators, including targets. Most evaluators confirmed that an interactive and iterative process with the relevant ministry and drafters of the CSP was required to ensure adequate submission of the *ex ante*.

When was the *ex ante* evaluation published and when was it revised?

Some evaluators were contracted in 2019 (AT, CY, EE), whilst others were in 2020 (MT). The earliest versions of the *ex ante* were submitted in 2021 (AT, IT, LU). Other countries submitted their *ex ante* evaluation in 2022 (CY, IT, MT). Since the EU political process took place in parallel, some evaluators could review earlier versions of the CAP SP and provide feedback on different sections, but not the final version of the CSP (IT). In other instances, the *ex ante* was submitted just a few months before the final submission of the CSP (MT).

How was the level of collaboration between the evaluators and the MA during the design of the CSP?

Most of the evaluators confirmed a close relationship with the MA. Regular meetings were held with a frequency intensifying from a monthly (DE, MT, SE) to a weekly basis as the deadline for submission became closer (CY, IT). There were intense and structured interactions with the representatives from the relevant ministry. For some Member States, the mainstreaming of online meetings due to the pandemic proved to be very effective since the evaluator team was made up of several experts from different institutes and universities.

Was a dedicated and structured process for dialogue and feedback set up between the MA, stakeholders and evaluators?

In some instances, a structured process was developed for the recommendations made by the evaluators whereby the relevant ministry provided feedback on how the recommendations were taken into account (LT, LV, SE).

Were stakeholders engaged in the *ex ante* evaluation?

Stakeholder consultations were a requirement for some *ex ante*

evaluations (CY, MT, SE). There were also instances where the MA was responsible for organising the stakeholder consultation exercise, with evaluators participating as attendees (DE, IT, LU, NL). These consultations were not necessarily explicitly organised for the *ex ante* evaluation. As a result, some countries did not have dedicated consultation sessions for the *ex ante* evaluation, but rather held meetings with national agencies for specific interventions, such as risk management.

Furthermore, some countries conducted stakeholder consultations after COVID-19 to determine whether the needs identified in the CSP remained valid (MT). This, however, was restricted to a limited number of participants. In certain instances, a revision to priorities was suggested, such as to account for the impact of COVID-19 on the supply chain and its resulting increase in costs (MT).

5.5.3 AQ3: To what extent have lessons learned from carrying out the *ex ante* evaluation and conclusions and recommendations from the *ex ante* report influenced the CSP?

To what extent have the conclusions and recommendations provided in the *ex ante* evaluation been considered during the finalisation of the CSPs?

Some evaluators confirmed that the relevant ministry established a structured process to handle the recommendations, which involved providing feedback on how they were addressed. This process was implemented for each phase of the *ex ante*, except for the final recommendations, as they were submitted at the same time as the CSP. As a result, although the evaluators had access to some chapters of the CSP for evaluation purposes, they did not have access to the complete version. While some MAs were well-structured, others did not indicate the changes made, which caused issues for the evaluators, who had to review the entire *ex ante* from scratch to understand the changes made. This lack of transparency was seen as an issue for some evaluators. However, other MAs had set up a formal process for the recommendations, with the relevant ministry highlighting which recommendations were adopted and which were not. For instance, the evaluators in Germany set up a RAG (Red, Amber and Green) system to prioritise the recommendations for the ministry. This facilitated the process as the ministry was aware of the crucial recommendations.

Was the engagement of the *ex ante* evaluation team considered constructive and positive?

Participants agreed that the engagement of the *ex ante* evaluation team with the MA was constructive and positive (CY, IT, LT, MT, SE)

5.5.4 AQ4: What good practices from the *ex ante* evaluation reports can be identified across Member States?

Good practices

- Going Beyond the LR: An assessment of impact for selected areas (namely climate change and biodiversity) (SE).
- The set up of a clear and transparent communication channel on the recommendations made by the evaluators (SE).
- RAG system to prioritise recommendations (DE).
- Stakeholder consultations (MT).



5.6 Annex 6 - Targeted survey with the MAs

5.6.1 Identification

| Country code | Answer |
|---|---|
| Q1: For which national <i>ex ante</i> evaluation report are you answering? | |
| MT | Malta |
| AT | Austria |
| FR | France |
| CY | Cyprus |
| PT | Portugal |
| SK | Slovak Republic |
| FI | Finland |
| HU | Hungary |
| NL | Netherlands |
| PL | Poland |
| DK | Denmark |
| LU | Luxembourg |
| IT | Italy |
| HR | Croatia |
| CZ | Czechia |
| SI | Slovenia |
| LT | Lithuania |
| SE | Sweden |
| BG | Bulgaria |
| EL | Greece |
| LV | Latvia |
| RO | Romania |
| IE | Ireland |
| EE | Estonia |
| BE-FL | Belgium (Flanders) |
| ES | Spain |
| BE-WL | Belgium (Wallonia) |
| Q2: From which organisation and department are you? | |
| MT | MA |
| AT | Austrian Ministry of Agriculture, Forestry, Regions and Water Management in Austria |
| FR | Ministry of Agriculture and Food Safety /Directorate for Ecological and Environmental Performance |
| CY | MA |



| Country code | Answer |
|--|---|
| Q2: From which organisation and department are you? | |
| PT | Cabinet for Policy Planning and General Administration (GPP), Ministry of Agriculture and Food |
| SK | MA |
| FI | Ministry of Agriculture and Forestry / Food Department |
| HU | Ministry of Agriculture |
| NL | NSP programme team |
| PL | Ministry of Agriculture and Rural Development Department of CAP |
| DK | Danish Agricultural Agency |
| LU | Ministry of Agriculture |
| IT | CREA - supporting the MA of the CAP SP for Italy |
| HR | Ministry of Agriculture |
| CZ | Ministry of Agriculture of the Czech Republic, MA Department for RD |
| SI | Ministry of Agriculture, Forestry and Food - Agriculture directorate |
| LT | Ministry of Agriculture, Department of EU Affairs and Support Policy |
| SE | Swedish Board of Agriculture, Rural Analysis Unit |
| BG | MA, Ministry of Agriculture |
| EL | MA of Greek RDP Evaluation Unit |
| LV | MA |
| RO | MA for NRDP |
| IE | Department of Agriculture, Food and the Marine, Ireland |
| EE | Ministry of Rural Affairs; Rural Affairs Policy and Analysis Department |
| BE-FL | Flemish Government - Department of Agriculture and Fisheries |
| ES | General Secretariat for Agriculture and Food of the Ministry of Agriculture, Fisheries and Food |
| BE-WL | Walloon Public Service - Agriculture, Natural Resources and Environment |

5.6.2 Ex ante evaluation process

| Country code | Answer |
|---|------------|
| Q3: When was the date of publication of the final ex ante evaluation report? | |
| LU | 18/10/2021 |
| FR | 20/12/2021 |
| SE | 21/12/2021 |
| PL | 23/12/2021 |
| IT | 30/12/2021 |
| EE | 30/12/2021 |
| SK | 10/02/2022 |
| IE | 01/03/2022 |



| Country code | Answer |
|--|------------|
| Q3: When was the date of publication of the final <i>ex ante</i> evaluation report? | |
| NL | 22/03/2022 |
| EL | 31/03/2022 |
| FI | 06/04/2022 |
| BE-FL | 08/04/2022 |
| BE-WL | 20/05/2022 |
| PT | 29/06/2022 |
| LT | 07/07/2022 |
| ES | 15/07/2022 |
| HU | 31/07/2022 |
| DK | 31/08/2022 |
| AT | 30/09/2022 |
| CY | 21/10/2022 |
| MT | 25/10/2022 |
| SI | 15/11/2022 |
| CZ | 25/11/2022 |
| BG | 07/12/2022 |
| LV | 21/12/2022 |
| RO | 11/01/2023 |
| HR | 13/01/2023 |

Q4: How many revisions did the *ex ante* evaluation report undergo? Please indicate the exact number of revisions and respective dates:

| | Number of revisions | Date 1 st revision | Date 2 nd revision | Date 3 rd revision | Date 4 th revision | Date 5 th revision | Date 6 th revision |
|----|---------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| MT | 1 | 05/10/2022 | | | | | |
| AT | 1 | 31/12/2021 | | | | | |
| FR | 4 | 25/03/2020 | 07/09/2021 | 16/12/2021 | 20/12/2021 | | |
| CY | 1 | | | | 21/10/2022 | | |
| PT | 4 | 09/11/2021 | 31/03/2022 | 27/06/2022 | 29/06/2022 | | |
| SK | 1 | | 18/01/2022 | | | | |
| FI | 4 | 17/01/2020 | 31/05/2021 | 11/02/2022 | 04/03/2022 | | |
| HU | 1 | | | 31/05/2022 | | | |
| NL | 1 | | 09/12/2021 | | | | |
| PL | 2 | 14/12/2021 | 22/12/2021 | | | | |
| DK | 6 | 22/06/2021 | 24/07/2021 | 17/09/2021 | 17/11/2021 | 24/11/2021 | 08/12/2021 |
| LU | 1 | 23/12/2022 | | | | | |
| IT | 1 | | | 01/07/2022 | | | |

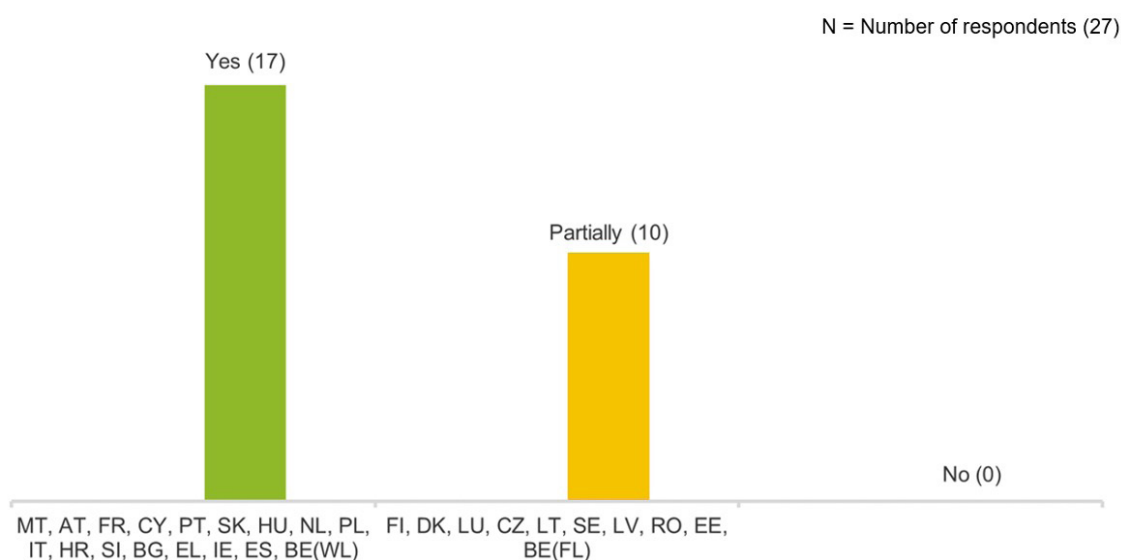


| Country code | Answer | | | | | | |
|---|---------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|-------------------------------|
| Q4: How many revisions did the <i>ex ante</i> evaluation report undergo? Please indicate the exact number of revisions and respective dates: | | | | | | | |
| | Number of revisions | Date 1 st revision | Date 2 nd revision | Date 3 rd revision | Date 4 th revision | Date 5 th revision | Date 6 th revision |
| HR | 3 | 20/09/2022 | 24/10/2022 | 01/12/2022 | | | |
| CZ | 6 | 05/09/2019 | 06/10/2019 | 30/04/2020 | 13/12/2021 | 29/07/2022 | 15/08/2022 |
| SI | 4 | 07/01/2021 | 23/12/2021 | 01/02/2022 | 28/10/2022 | | |
| LT | 5 | 16/07/2021 | 15/10/2021 | 11/04/2022 | 27/05/2022 | 01/07/2022 | |
| SE | 3 | 01/06/2020 | 06/04/2021 | 02/12/2021 | | | |
| BG | 1 | | | | 22/12/2021 | | |
| EL | 1 | | | 31/10/2022 | | | |
| LV | 1 | | | 18/10/2022 | | | |
| RO | 5 | 03/05/2022 | 15/06/2022 | 27/09/2022 | 04/10/2022 | 11/10/2022 | |
| IE | 1 | | | | 17/12/2021 | | |
| EE | 5 | 28/02/2020 | 26/02/2021 | 18/10/2021 | 01/12/2021 | 30/12/2021 | |
| BE-FL | 1 | 04/03/2022 | | | | | |
| ES | 1 | | 29/06/2022 | | | | |
| BE-WL | 1 | 16/09/2022 | | | | | |
| Q5: Did the <i>ex ante</i> evaluation follow a multiple-phase approach? [A 'multiple-phase approach' means starting with an evaluation of the SWOT and needs assessment, followed by an evaluation of the contribution to CAP strategic objectives, internal and external coherence, etc.]. If 'No', please specify further. | | | | | | | |
| MT | Yes | | | | | | |
| AT | Yes | | | | | | |
| FR | Yes | | | | | | |
| CY | Yes | | | | | | |
| PT | Yes | | | | | | |
| SK | Yes | | | | | | |
| FI | Yes | | | | | | |
| HU | Yes | | | | | | |
| NL | Yes | | | | | | |
| PL | Yes | | | | | | |
| DK | Yes | | | | | | |
| LU | Yes | | | | | | |
| IT | Yes | | | | | | |
| HR | Yes | | | | | | |
| CZ | Yes | | | | | | |
| SI | Yes | | | | | | |
| LT | Yes | | | | | | |



| Country code | Answer |
|---|--------|
| Q5: Did the <i>ex ante</i> evaluation follow a multiple-phase approach? [A 'multiple-phase approach' means starting with an evaluation of the SWOT and needs assessment, followed by an evaluation of the contribution to CAP strategic objectives, internal and external coherence, etc.]. If 'No', please specify further. | |
| SE | Yes |
| BG | Yes |
| EL | Yes |
| LV | Yes |
| RO | Yes |
| IE | Yes |
| EE | Yes |
| BE-FL | Yes |
| ES | Yes |
| BE-WL | Yes |

Q6.1: Do you consider that an adequate amount of time was dedicated to each step of the process for conducting the *ex ante* evaluation?



Q6.2: If 'Partially' or 'No', please explain in a few words the reasons why.

| | |
|----|--|
| FI | We have time to evaluate, but CSP preparation and interpretation by the Commission of CSP preparation take time, which did not take into account <i>ex ante</i> evaluation process. |
| DK | The national political approval of the CAP Strategic Plan came at a late stage which limited the time for the process of completing the evaluation. |
| LU | More time was needed to explain the complexity of the CAP Plan. This was not possible because a clear view of the CAP plan was only available very late in the process. |
| CZ | It was difficult to estimate deadlines for each step of the process due to a delay in the approval of the multiannual financial framework (MFF) at the EU level, which is essential for the full completion of the SP CAP. |



| Country code | Answer | |
|---|---|----------------------|
| Q6.2: If 'Partially' or 'No', please explain in a few words the reasons why. | | |
| LT | Time for SWOT assessment was optimal, meanwhile, evaluation of the intervention strategy, financial distribution, and indicator plan was limited by complex simultaneous circumstances: uncertainty of EU legal framework, legal deadlines and discussions with the Commission on the SP content and design. | |
| SE | There was sufficient time for the first steps (SWOT, needs assessment), and less time for the final steps (assessment of the intervention details, etc). Important to note that this was due to the way the process for developing the CSP was set up, including political and other decision-making processes. | |
| LV | Not an adequate amount of time was dedicated as CAP SP approval procedures and <i>ex ante</i> evaluation had to be done simultaneously. No specific time slot for evaluation is foreseen in the designing process of CAP SP. | |
| RO | In the beginning, the process of <i>ex ante</i> evaluation was a little bit slower, taking into account that the European framework for CAP 2023-2027 has not been finalised. When the European regulations were approved and the guiding elements were provided, in the context of negotiations with the EC, the process of evaluation was accelerated and sometimes, the amount of time was not adequate. | |
| EE | As the legal framework of the CAP plan and therefore the timeframe for drafting the CAP plan changed then for some parts of the evaluation had more time and some did not. | |
| BE-FL | Most parts of the <i>ex ante</i> evaluation were given proper time. However, several analyses were dependent on the finalization of the interventions. Because of the late finalization of the intervention, and the tight deadlines at the end of the planning period, not all these analyses were given the needed time or attention. | |
| Q7.1: How did the <i>ex ante</i> evaluator/s interact with the MA during the: [rate the level of interaction with 0 referring to 'not relevant', 1 referring to 'poor interaction' and 5 referring to 'excellent interaction'] | | |
| | Carrying out of the <i>ex ante</i> evaluation | Carrying out the SEA |
| MT | 4 | 4 |
| AT | 4 | 4 |
| FR | 5 | 5 |
| CY | 4 | 4 |
| PT | 4 | 3 |
| SK | 4 | 3 |
| FI | 5 | 4 |
| HU | 5 | 5 |
| NL | 5 | 0 |
| PL | 4 | 0 |
| DK | 4 | 4 |
| LU | 4 | 2 |
| IT | 5 | 5 |
| HR | 5 | 0 |
| CZ | 5 | 0 |
| SI | 4 | 4 |
| LT | 4 | 4 |
| SE | 4 | 4 |



| Country code | Answer | |
|---|---|----------------------|
| Q7.1: How did the <i>ex ante</i> evaluator/s interact with the MA during the: [rate the level of interaction with 0 referring to 'not relevant', 1 referring to 'poor interaction' and 5 referring to 'excellent interaction'] | | |
| | Carrying out of the <i>ex ante</i> evaluation | Carrying out the SEA |
| BG | 3 | 4 |
| EL | 3 | 4 |
| LV | 4 | 4 |
| RO | 5 | 5 |
| IE | 5 | 5 |
| EE | 5 | 5 |
| BE-FL | 2 | 3 |
| ES | 5 | 5 |
| BE-WL | 4 | 4 |

Q7.2: To what extent was the evaluator interactive in the evaluation of the following elements

| | SWOT analysis & needs assessment | Intervention logic/ contribution to objectives | External/ internal coherence | Allocation of budgetary resources | Outputs, results and establishment of milestones and targets | Measures to reduce the administrative burden | SEA specific assessment |
|----|----------------------------------|--|------------------------------|-----------------------------------|--|--|-------------------------|
| MT | 4 | 3 | 3 | 4 | 4 | 3 | 4 |
| AT | 4 | 4 | 3 | 3 | 4 | 3 | 4 |
| FR | 5 | 5 | 5 | 4 | 4 | 4 | 4 |
| CY | 4 | 5 | 5 | 3 | 3 | 3 | 3 |
| PT | 4 | 3 | 1 | 1 | 0 | 0 | 2 |
| SK | 4 | 4 | 4 | 4 | 4 | 4 | 3 |
| FI | 5 | 5 | 3 | 4 | 5 | 3 | 5 |
| HU | 4 | 5 | 5 | 4 | 5 | 4 | 4 |
| NL | 5 | 5 | 4 | 4 | 5 | 0 | 0 |
| PL | 5 | 4 | 3 | 3 | 4 | 4 | 0 |
| DK | 5 | 4 | 4 | 3 | 3 | 3 | 3 |
| LU | 1 | 3 | 5 | 0 | 0 | 0 | 4 |
| IT | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| HR | 5 | 5 | 5 | 5 | 5 | 4 | 0 |
| CZ | 5 | 5 | 5 | 5 | 5 | 5 | 0 |
| SI | 5 | 4 | 4 | 4 | 4 | 3 | 5 |
| LT | 4 | 4 | 3 | 3 | 4 | 3 | 4 |
| SE | 5 | 4 | 3 | 3 | 4 | 3 | 4 |
| BG | 3 | 4 | 3 | 3 | 4 | 2 | 4 |



| Country code | Answer | | | | | | |
|--|--|--|------------------------------|-----------------------------------|--|--|-------------------------|
| Q7.2: To what extent was the evaluator interactive in the evaluation of the following elements | | | | | | | |
| | SWOT analysis & needs assessment | Intervention logic/ contribution to objectives | External/ internal coherence | Allocation of budgetary resources | Outputs, results and establishment of milestones and targets | Measures to reduce the administrative burden | SEA specific assessment |
| EL | 4 | 3 | 3 | 3 | 3 | 2 | 4 |
| LV | 5 | 4 | 4 | 4 | 3 | 5 | 4 |
| RO | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| IE | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| EE | 5 | 4 | 4 | 5 | 5 | 4 | 5 |
| BE-FL | 4 | 4 | 3 | 0 | 4 | 0 | 4 |
| ES | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| BE-WL | 4 | 4 | 4 | 4 | 4 | 4 | 4 |
| Q8: Do you have any additional comments regarding the interactions between the <i>ex ante</i> evaluator and the MA? | | | | | | | |
| AT | There was extensive consultation throughout the whole <i>ex ante</i> period, lasting over a year. | | | | | | |
| FR | Exchanges with the evaluators took place on a regular and ongoing basis, which allowed the evaluator to begin his work even though the NSP had not been finalised, and which gave the MAs time to take on board the evaluator's recommendations. | | | | | | |
| SK | It would be more time effective if the <i>ex ante</i> evaluator provided suggestions, advice and notes to the authors of the SP, not after the first drafts were written. | | | | | | |
| FI | Interaction from the evaluator side was good, but MA capability was very limited to into take account this feedback. | | | | | | |
| HU | No, the cooperation was perfect. | | | | | | |
| NL | The exchange of information between the programme team and the evaluators went very well. During the evaluation period, various building blocks of the programme were looked at, such as the SWOT, several steering committee pieces and the concept NSP. By providing critical, objective and periodic comments, the programme team could deliver a strong program in which there was an eye for logic and coherence in the approach. | | | | | | |
| IT | A steering group was set up (informally) by including experts on CAP SP and on evaluation and to interact with the <i>ex ante</i> evaluator on a weekly basis. This enabled a continuous dialogue on policy decisions and the evaluation process and results. | | | | | | |
| CZ | The evaluator was very patient and he was willing to cooperate. The process of <i>ex ante</i> evaluation was affected by the extension of contract terms, and the slowdown of work on the SP over the expected project schedule. The SEA assessment was developed outside of the <i>ex ante</i> evaluation by another evaluator. | | | | | | |
| SI | The cooperation was correct, but a lot of time was spent both by the evaluator and the MA. The evaluators' comments should be more specific so that the GSP can be improved based on these comments. | | | | | | |
| LT | Interaction with evaluators was limited by circumstances mentioned under Q6. | | | | | | |
| SE | The level of interactivity largely reflects the amount of time available for the evaluators, due to the policy-making process (see also comment on Q6 above). | | | | | | |

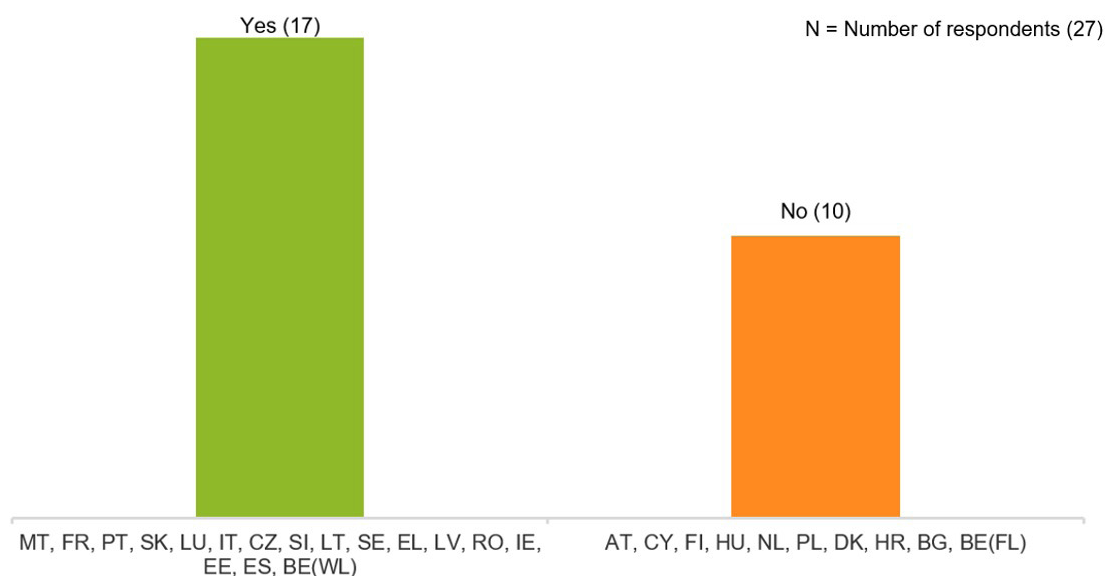


| Country code | Answer |
|---|--|
| Q8: Do you have any additional comments regarding the interactions between the <i>ex ante</i> evaluator and the MA? | |
| RO | The interactions between the <i>ex ante</i> evaluator and the MA were based on bilateral meetings, discussions and permanent dialogue. |
| IE | We had a positive experience of working on the <i>ex ante</i> evaluation including SEA/AA. As part of our tendering process, we sought consultants to deliver the <i>ex ante</i> , SEA, and AA. The evaluators who won that tender and worked on the <i>ex ante</i> formed part of a consortium which also examined the SEA and AA implications of the CSP. The stakeholder CAP Consultative Committee was kept updated on progress with presentations from the evaluators on many elements. |
| BE-FL | While the interaction with the <i>ex ante</i> evaluator was good during most parts of the <i>ex ante</i> evaluation. At times there was inadequate feedback from the evaluator about the steps that were being taken. This at times made it hard to follow the process of the <i>ex ante</i> evaluation and made adjusting the program based on the <i>ex ante</i> evaluation less relevant. |
| ES | Collaboration has been constant throughout the process of drawing up the CSP. The evaluation team made a great effort in the final stages of preparing the CSP, due to the constant dialogue and recommendations given by the Commission and the CSP's drafting team. We believe that the work carried out by the team evaluated <i>ex ante</i> has been very useful and constructive. |
| Q9: Was a dedicated and structured process for dialogue and feedback set up between the MA, stakeholders and evaluators? | |
| MT | Yes |
| AT | Yes |
| FR | Yes |
| CY | Yes |
| PT | Yes |
| SK | Yes |
| FI | No |
| HU | Yes |
| NL | Yes |
| PL | Yes |
| DK | Yes |
| LU | Yes |
| IT | No |
| HR | No |
| CZ | Yes |
| SI | Yes |
| LT | No |
| SE | Yes |
| BG | Yes |
| EL | No |
| LV | Yes |
| RO | Yes |
| IE | Yes |



| Country code | Answer |
|---|--------|
| Q9: Was a dedicated and structured process for dialogue and feedback set up between the MA, stakeholders and evaluators? | |
| EE | Yes |
| BE-FL | No |
| ES | Yes |
| BE-WL | Yes |

Q10.1: Were stakeholders involved in the process of the *ex ante* evaluation report?



Q10.2: If 'Yes', which stakeholders' groups were involved, please rate from 1 to 5 the extent to which their feedback was appropriate and reflected in the *ex ante* evaluation report. [multiple choice allowed, 1 refers to 'poorly', 3 refers to 'neutral' and 5 refers to 'excellent']

| | Civil society organisations | Farmers' representatives | Private sector representatives | Other competent authority | Scientific community | Other [if 'Other', please specify the groups] (*) |
|----|-----------------------------|--------------------------|--------------------------------|---------------------------|----------------------|---|
| MT | 4 | 4 | 4 | 4 | 0 | 0 |
| FR | 0 | 0 | 0 | 3 | 0 | 0 |
| PT | 2 | 4 | 2 | 4 | 0 | 0 |
| SK | 5 | 5 | 4 | 4 | 5 | 0 |
| LU | 1 | 2 | 1 | 3 | 0 | 0 |
| IT | 3 | 3 | 0 | 5 | 5 | 0 |
| CZ | 0 | 4 | 0 | 4 | 4 | 0 |
| SI | 3 | 4 | 3 | 0 | 0 | 0 |
| LT | 2 | 3 | 0 | 3 | 0 | 0 |
| SE | 0 | 0 | 0 | 4 | 0 | 0 |
| EL | 2 | 0 | 0 | 3 | 3 | 3 |



| Country code | Answer | | | | | |
|---|-----------------------------|--------------------------|--------------------------------|---------------------------|----------------------|---|
| Q10.2: If 'Yes', which stakeholders' groups were involved, please rate from 1 to 5 the extent to which their feedback was appropriate and reflected in the <i>ex ante</i> evaluation report. [multiple choice allowed, 1 refers to 'poorly', 3 refers to 'neutral' and 5 refers to 'excellent'] | | | | | | |
| | Civil society organisations | Farmers' representatives | Private sector representatives | Other competent authority | Scientific community | Other [if 'Other', please specify the groups] (*) |
| LV | 4 | 4 | 0 | 4 | 4 | 0 |
| RO | 0 | 0 | 0 | 5 | 0 | 0 |
| IE | 5 | 5 | 0 | 5 | 5 | 0 |
| EE | 4 | 4 | 0 | 0 | 0 | 0 |
| ES | 0 | 0 | 0 | 5 | 0 | 0 |
| BE-WL | 3 | 3 | 0 | 0 | 0 | 0 |
| (*) if 'Other' was not specified by France, Romania, Spain and Sweden | | | | | | |

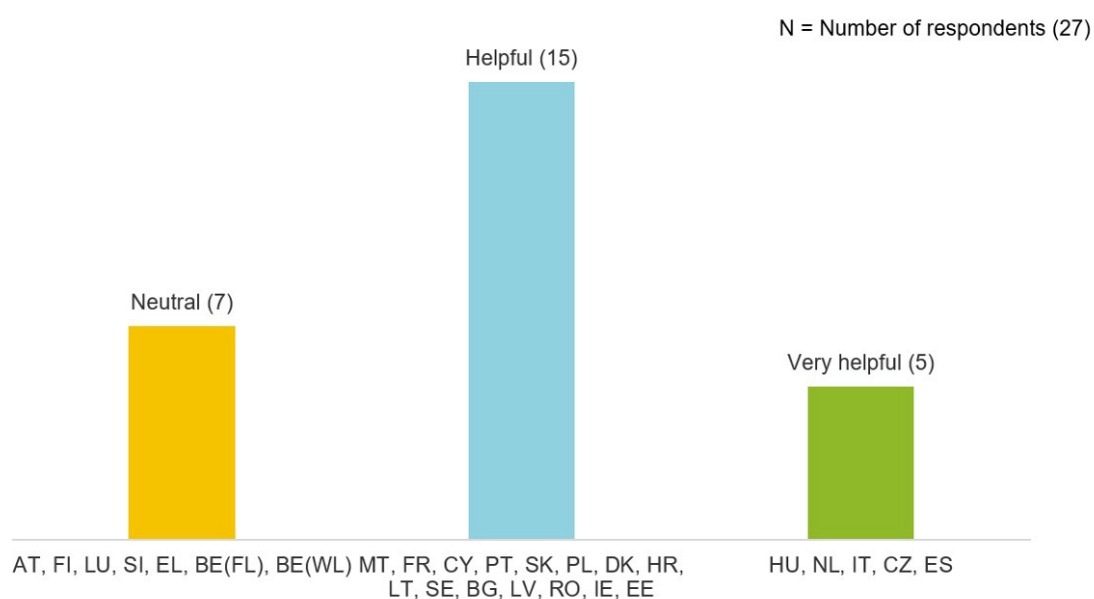
5.6.3 Contribution of the *ex ante* evaluation process to the design of the CSPs

| Country code | Answer | | | | | | |
|--|------------------------------------|---|-----------------------------|-----------------------------------|--|--|-------------------------|
| Q11: Which of the following elements from the <i>ex ante</i> evaluation or the SEA helped the most to improve the CAP Strategic Plan? [Rate the level of improvement with 1 referring to 'not helpful' and 5 referring to 'extremely helpful'] | | | | | | | |
| | SWOT analysis and needs assessment | Intervention logic/contribution to objectives | External/internal coherence | Allocation of budgetary resources | Outputs, results and establishment of milestones and targets | Measures to reduce the administrative burden | SEA specific assessment |
| MT | 4 | 4 | 4 | 4 | 4 | 3 | 4 |
| AT | 4 | 4 | 3 | 3 | 4 | 3 | 4 |
| FR | 4 | 4 | 4 | 3 | 3 | 3 | 4 |
| CY | 4 | 5 | 3 | 3 | 4 | 2 | 3 |
| PT | 4 | 3 | 1 | 1 | 1 | 1 | 3 |
| SK | 3 | 4 | 3 | 5 | 4 | 4 | 3 |
| FI | 4 | 4 | 2 | 2 | 2 | 1 | 2 |
| HU | 4 | 4 | 5 | 3 | 3 | 3 | 5 |
| NL | 4 | 4 | 4 | 4 | 4 | 1 | 1 |
| PL | 5 | 3 | 3 | 3 | 4 | 3 | 1 |
| DK | 4 | 4 | 4 | 2 | 2 | 2 | 3 |
| LU | 4 | 4 | 3 | 1 | 1 | 1 | 1 |
| IT | 3 | 4 | 3 | 3 | 4 | 3 | 5 |
| HR | 4 | 5 | 4 | 3 | 4 | 1 | 4 |
| CZ | 5 | 5 | 5 | 3 | 3 | 3 | 1 |



| Country code | Answer | | | | | | |
|---|------------------------------------|---|-----------------------------|-----------------------------------|--|--|-------------------------|
| Q11: Which of the following elements from the <i>ex ante</i> evaluation or the SEA helped the most to improve the CAP Strategic Plan? [Rate the level of improvement with 1 referring to 'not helpful' and 5 referring to 'extremely helpful'] | | | | | | | |
| | SWOT analysis and needs assessment | Intervention logic/contribution to objectives | External/internal coherence | Allocation of budgetary resources | Outputs, results and establishment of milestones and targets | Measures to reduce the administrative burden | SEA specific assessment |
| SI | 4 | 4 | 3 | 3 | 3 | 3 | 4 |
| LT | 4 | 3 | 3 | 3 | 3 | 3 | 4 |
| SE | 5 | 4 | 3 | 3 | 3 | 3 | 3 |
| BG | 4 | 4 | 2 | 3 | 3 | 2 | 4 |
| EL | 4 | 3 | 4 | 3 | 4 | 2 | 3 |
| LV | 4 | 4 | 3 | 3 | 3 | 3 | 4 |
| RO | 4 | 4 | 4 | 3 | 3 | 3 | 4 |
| IE | 4 | 4 | 4 | 3 | 4 | 3 | 5 |
| EE | 5 | 4 | 5 | 3 | 3 | 3 | 4 |
| BE-FL | 3 | 4 | 2 | 1 | 2 | 1 | 3 |
| ES | 5 | 5 | 5 | 5 | 5 | 5 | 5 |
| BE-WL | 3 | 3 | 3 | 3 | 3 | 3 | 3 |

Q12: Were issues raised throughout the *ex ante* evaluation process, such as preliminary recommendations, considered to be helpful in improving the CAP Strategic Plan? [1 representing 'not helpful', 3 representing 'neutral', and 5 representing 'very helpful']



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