



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

**EXECUTIVE  
SUMMARY**  
May 2025



Funded by  
the European Union

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## Recommended citation:

EUROPEAN COMMISSION – Directorate-General for Agriculture and Rural Development – Unit A.3 (2025): Study on simplification and administrative burden for farmers and other beneficiaries under the CAP.

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# 1. Objectives and scope

The overall aim of this study is to support DG AGRI in **understanding and assessing the burden on beneficiaries arising from the 2023-2027 CAP and drawing conclusions for policy simplification**.

Specifically, the objectives of this study, which **covers all 27 Member States of the EU** and the respective 28 CAP Strategic Plans, are the following:

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

## 2. Policy framework

The 2017 public consultation on 'Modernising and simplifying the CAP' identified the excess of bureaucracy as an obstacle to the success of the CAP. In answering the questionnaire, farmers and other respondents had expressed agreement with the majority of the proposed solutions for a simpler and more flexible policy, from "reducing overlaps between rural development and other CAP measures" to "giving more choice to farmers in terms of environmental measures" and "making better use of technology to reduce the incidence of inspections"<sup>1</sup>.

The amount of documentation and paperwork required by the CAP, the frequency of inspections and the lack of transparency surrounding them, and the complex and sometimes inconsistent rules to be respected were, among other factors, generally perceived as burdensome and "understood as putting a barrier to innovation & investments in the agricultural sector"<sup>2</sup>.

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

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

According to the 'Synthesis of ex ante evaluations of CAP post-2020' (European Evaluation Helpdesk for the CAP, 2023)<sup>3</sup>, all 28 CAP Strategic Plans (CSPs) "support, at least fairly well" simplification. **The majority of the Member States have targeted the reduction of administrative burden** in each of the five aspects covered by the ex ante evaluation (i.e. the design of the policy and interventions, digital application systems, integrated administration and control system - IACS, non-IACS interventions and other simplification solutions).

**Simplification of the CAP is an ongoing process.** In May 2024, the European Parliament and the Council approved Regulation (EU) 2024/1468<sup>4</sup> amending Regulations 2021/2115 and 2021/2116. As regards simplification measures and reduction of burden for farmers, the amendments allow for a higher degree of flexibility (for example, good agricultural and environmental condition of land (GAEC) 6 and 7) and foresee certain exemptions or the cancellation of the application of targeted CAP requirements (4% landscape features and/or land fallow foreseen by GAEC 8 is removed and replaced by an eco-scheme<sup>5</sup> and, for the establishment of new landscape features on arable land, farms under 10 hectares are exempted from conditionality controls and penalties).

Lastly, the implementing regulation of 4 September 2024<sup>6</sup> allows for more flexibility in the use of geo-tagged photos by Member States for the area monitoring system within the context of IACS.

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

2 Ibid.

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

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

5 Eco-scheme rewarding practices for the maintenance of non-productive areas, such as land lying fallow.

6 Commission Implementing Regulation (EU) 2024/2202 of 4.9.2024 amending Implementing Regulation (EU) 2022/1173 laying down rules for the application of Regulation (EU) 2021/2116 of the European Parliament and of the Council with regard to the integrated administration and control system in the common agricultural policy.



# 3. Methodological approach

## 3.1. Key terms

### Administrative burden.

The study refers to the definition of administrative burden provided in the Better Regulation 'Toolbox'<sup>7</sup>. **Administrative burden corresponds to the cost of collecting and processing information "which is done solely because of a legal obligation"**<sup>8</sup>.

### Simplification.

The EU CAP Network's guidelines 'Use of factors of success in evaluation'<sup>9</sup> defines simplification as **the minimisation of costs that are not strictly necessary for the achievement of the objectives of the CAP and the adoption of measures that reduce administrative burden for the administration and beneficiaries.**

### Gold-plating.

Consistent with the Better Regulation Guidelines<sup>10</sup>, the working definition of gold-plating adopted in this study is **"Member State imposed obligations that go beyond what is envisaged in the legislation and are not strictly necessary for the achievement of the objectives of the CAP"**.

## 3.2. Data collection methods and tools

The study is based on data collected through several tools.

- The European Commission **targeted consultation on simplification (TC)** was open from 7 March to 8 April 2024 and allowed to collect information from about 27 000 farmers. Analysis of TC data includes the elaborations provided by the European Commission as well as data from open-ended questions, processed with AI support.
- **In-depth interviews with 298 farmers** selected among the participants in the TC, based on a 23-question questionnaire structured in three parts to cover administrative burden, compliance with requirements and ideas for simplification respectively.
- **Documentary research**, including the analysis of policy and programme documents and a review of relevant literature on administrative burden and gold-plating.
- **Scoping interviews** with EU-level organisations of farmers and other beneficiaries and networks. **Eight interviews** were carried out.
- **Questionnaire-based surveys** to selected groups of CAP beneficiaries (i.e. LAGs, EIP Operational Groups, POs of the fruit and vegetable sector, wine growers and producers) and advisory services at EU level. **715 beneficiaries and 215 advisory services participated** in the surveys.
- **In-depth interviews** in all 27 Member States with Managing Authorities, Paying Agencies and other key CSP stakeholders. **144 interviews were carried out in total** involving 161 stakeholders.

7 European Commission, *Better Regulation Toolbox*, 2023, [https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox\\_en](https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en).

8 Ibid., p. 523.

9 European Commission: Directorate-General for Agriculture and Rural Development – Unit A.3, *Use of Factors of Success in Evaluation*, 2023, [Use of factors of success in evaluation | EU CAP Network \(europa.eu\)](https://ec.europa.eu/europa.eu).

10 European Commission, *Better Regulation Guidelines*, SWD(2021) 305 final, 3/11/2021.



## 4. Main results

### Answers to research questions

The analysis is developed according to **three research questions** aiming at fulfilling the objectives of the study.

Under the first study question, the analysis focuses on the main causes of burden for beneficiaries related to CAP and the proposed simplification actions. The second research question aims at quantifying the administrative burden for 2023-2027 CAP beneficiaries. The third research question seeks to identify the sources of burden at the level of EU legislation (further distinguishing between CAP and non-CAP rules) or Member State implementation choices, including gold-plating. It then focuses on suggestions and good practices for simplification at Member State level.

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

The analysis sought to capture the main causes of burden for farmers and other CAP beneficiaries<sup>11</sup>. Drawing on the results of the targeted consultation and triangulating them with other sources of information, this research question:

- Explored the administrative tasks beneficiaries perform in order to apply for and receive CAP aid. Preparation, application and follow-up, recording and reporting, controls and inspections are the procedural steps they normally follow to receive CAP support.
- Focused on conditionality, other environmental requirements and CSP interventions to identify the most challenging ones ('main areas of burden').

The analysis by procedural step allowed a consistent identification of several recurrent challenges throughout all sources of information:

- For the **preparation** step, unclear rules, frequently changing rules and multiple legislative layers represented obstacles to a full understanding of EU regulations, aid schemes and national implementation rules for farmers and other beneficiaries. Beneficiaries struggled to capture the novelties introduced in the 2023-2027 programming period (e.g. a new 'green architecture' and eco-schemes) also due to poor or delayed information from authorities. LAGs faced additional issues in the preparation of Local Development Strategies (LDS) (e.g. the lack of official data related to LEADER areas).
- **Aid application** was the most burdensome step for all types of beneficiaries, specifically due to excessive collection of evidence, difficult requirements (compliance challenges), issues with digital tools (mostly related to the identification of eligible areas for area-based interventions)

and burdensome follow-up (often linked to the area monitoring system and the request for geotagged photos). Consistent with the targeted consultation<sup>12</sup>, investment application is considered very challenging in relation to the amount of supporting documents, including cost justification, by farmers and EIP Operational Groups (OGs) (step two of the two-step application process where detailed projects are required). Producer Organisations (POs) also mentioned the minimum financial thresholds for environment and research<sup>13</sup> as a difficult requirement to comply with.

- **Recording and reporting** entails burdensome information obligations, repeated submission of the same information and digitalisation-related issues (e.g. manual recording or misalignment between recording and reporting systems). As already illustrated by the targeted consultation, farmers record and report information in relation to both CAP aid and legislation outside the CAP, mainly national. Repeated reporting of the same information to the same or different authorities is a major issue. A share of them (25% of the interviewed farmers) record information voluntarily for farm management purposes and would even in the absence of obligations ('business as usual').

Recording and reporting were considered very burdensome by wine growers and producers, burdened by numerous declarations and redundant obligations.

- **Controls and inspections** were again linked to different purposes, including CAP aid, non-CAP and national legislation. Repeated submission of the same information is one of the issues, together with time-consuming activities to prepare for and attend inspections, unclear rules underpinning controls, lack of flexibility in enforcing rules (e.g. sanctions applied for minor violations) and communication with inspectors, whose behaviour and perceived competence is highly valued by farmers and can positively or negatively influence their experience with controls.

Most POs also rated this procedural step as 'very burdensome' in relation to sectoral interventions.

In relation to **compliance with conditionality and other environmental requirements**<sup>14</sup>, challenges can be attributed to fundamental misalignment in time horizons and territorial scales between CAP requirements and farming activities. Whilst farmers generally operate within short-term profit frameworks, conditionality targets long-term and EU-level environmental improvements. This misalignment fosters distrust and a perception of compliance as burdensome rather than beneficial. Confirming the results of the targeted consultation<sup>15</sup>, interviewed farmers consistently identified **GAECs as the most challenging CAP requirement**, particularly GAEC 8 on the minimum share standard, and GAECs 6, 7 and 4, which focus on soil management and non-productive area requirements. The recent revisions to GAECs 8, 6 and 7 in the targeted CAP review indicate responsiveness to farmers' concerns.

11 LAGs, EIP OGs, POs of the fruit and vegetable sector, wine growers and producers.

12 'Applying for investments' was rated highly complex by 81% of farmers who provided a response.

13 Regulation (EU) 2021/2115.

14 Other environmental requirements covered by the study are those included in Annex XIII of Regulation (EU) 2021/2115.

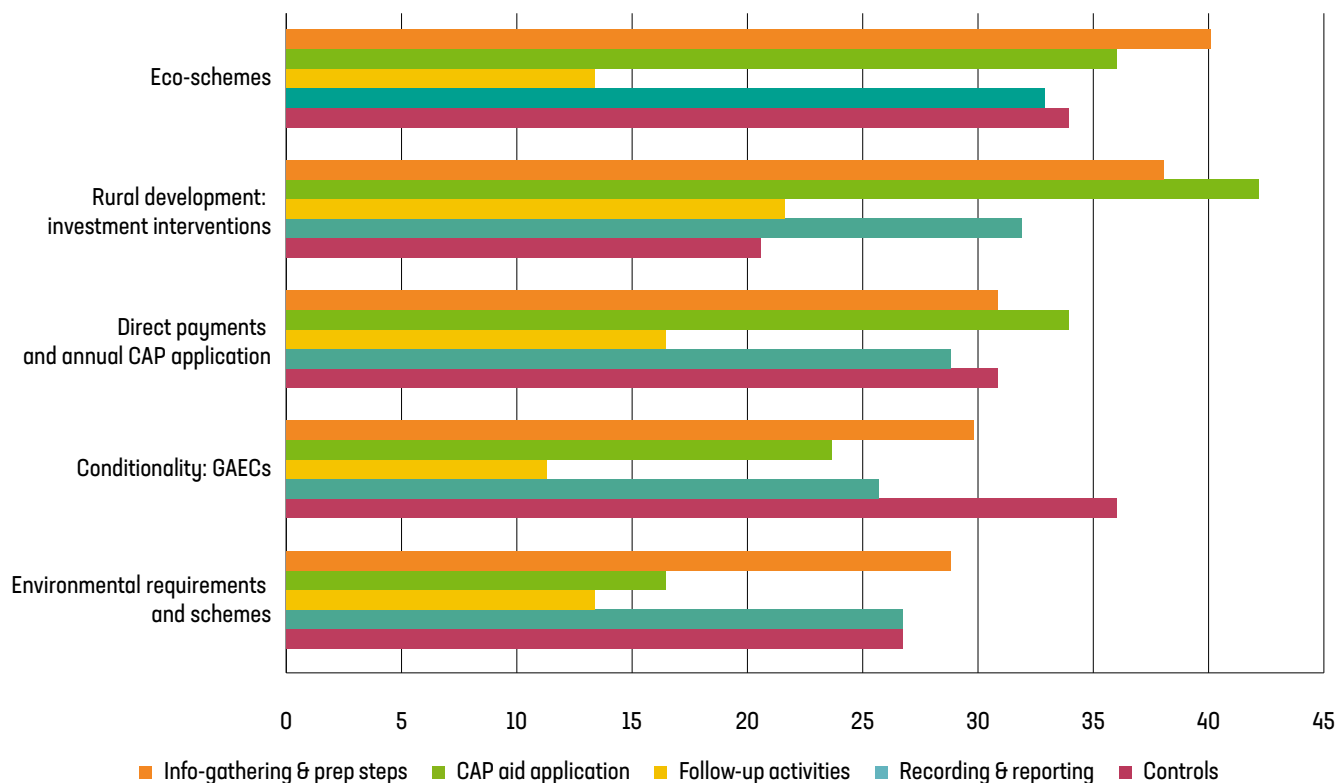
15 73% of 'high complexity'. European Commission's elaboration of TC results.





Interviews with MAs, PAs and Member State stakeholders confirmed that GAECs are among the CAP's main areas of burden, particularly in relation to controls (to be noted that the control sample must cover at least 1% of the CAP beneficiaries) along with investments. These are found as more burdensome in the application phase and eco-schemes in the preparation phase. Among the 'main areas of burden', respondents also cited direct payments (however, mainly referring to the process of annual CAP application rather than specific complexity of aid schemes). Furthermore, several interviewees pointed to the challenging interplay between environmental requirements (i.e. conditionality and other environmental rules outside the CAP) and voluntary schemes<sup>16</sup>.

**Figure 1. Distribution of procedural steps indicated as most burdensome, for the top five areas of burden**



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

The following table presents a summary of the findings under the first research question (RQ1), including the main causes of burden for CAP beneficiaries in relation to the relevant procedural step, the main requirements and interventions (i.e. 'areas of burden'), the challenge they refer to and references to the legislative sources mentioned by beneficiaries.

<sup>16</sup> This area of burden aggregates a number of general responses mentioning 'conditionality' with no specific reference to any GAEC or SMR, 'green architecture' or other general reference to 'environmental rules'.



**Table 1. Main causes of burden for CAP beneficiaries**

Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
<b>Clarity and communication</b>	Unclear rules and procedures	Preparation	Cross-cutting	EU: difficulty to go through CAP regulations (e.g. lengthy, technicalities, terminology)  EU/Member States: late approval of legislation (CAP regulations, CSPs and implementation acts) with no time to get familiar with novelties (e.g. 'eco-schemes', 'new green architecture')  Member States: poor or delayed information and support; unclear calls and implementation documents
	Unclear rules and communication with inspectors	Controls	Cross-cutting	Member States: (both CAP and non-CAP): unclear rules underpinning controls, unclear follow-up, including sanctions, difficulty to communicate with inspectors
	Unclear rules for conditionality and other requirements	Meeting requirements	GAECs  Other environmental and sanitary rules	EU/Member States: overlaps with national legislation; unclear definitions (e.g. buffer strips, non-productive areas)  Member States: additional requirements; unclear implementation, simplification measures not fully implemented
<b>Complexity and consistency of regulatory frameworks</b>	Frequently changing rules	Preparation  Application	Cross-cutting	EU: amendments to CAP regulations  EU/Member States: amendments to CSPs  Member States: changes in calls and other implementation documents and procedures, sometimes while calls are open
	Multiple layers of legislation	Preparation  Recording/reporting  Controls	Cross-cutting	EU/Member States: multiple sets of rules, potentially overlapping and conflicting





Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
<b>Excessive information obligations</b>	Collection of evidence and proofs	Application	Investments Sectoral interventions (POs) EIP OGs	Member States: information, proofs and supporting documents required when applying for investments and area/animal-based interventions
	Time consuming follow-up activities	Application	Area-based interventions	EU: rules regarding area monitoring system and geo-tagged photos Member States: implementation of IACS and national IT systems
	Excessive or time-consuming recording and reporting	Recording/reporting	Eco-schemes Area/animal-based interventions Investments Wine sector EIP OGs	EU/ Member States (both CAP and non-CAP): multiple recording and reporting obligations Member States: recording/reporting obligations related to CSP interventions, including rigid deadlines
	Administrative and organisational aspects	Meeting Requirements	GAECs	EU/Member States: administrative tasks (e.g. recording and reporting) related to conditionality
<b>Repetitive tasks</b>	Repeated or continuous submission of the same information	Application Recording/reporting	Wine sector	Member States: CAP application procedures require the provision of the same information repeatedly Member States: (CAP and non-CAP): several authorities ask for the same data (lack of harmonisation of procedures and interoperability of IT systems)
	Frequency and redundancy of controls	Controls		Member States: (CAP and non-CAP): several authorities ask for the same data (lack of harmonisation of procedures and interoperability of IT systems)



Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
<b>Compliance issue</b>	Meeting requirements and eligibility conditions	Application Controls Meeting requirements	Eco-schemes Area/animal-based interventions Investments Sectoral interventions (POs)	EU: CAP regulations: financial thresholds (environment, research) for POs, rules for investments in irrigation  Member States: requirements (e.g. gold-plating, restrictions, rigid deadlines) set for nationally designed CSP interventions
	Farm management operations	Controls Meeting requirements	GAECs Other environmental and sanitary rules	EU: challenging objectives of GAECs and other requirements  Member States: additional requirements, lack of adaptation to local conditions simplification measures not fully implemented
	Contextual issues	Preparation Application Controls Meeting requirements	GAECs Other environmental and sanitary rules	
	Economic impact	Preparation Meeting requirements	GAECs Other environmental and sanitary rules	
<b>Digitalisation issues</b>	Issues related to digital tools or online platforms	Application	IACS interventions	EU: difficulties and time-consuming activities related to LPIS <sup>17</sup> and geospatial application  Member States: issues with IT platforms and tools
	Limited or inefficient use of digital tools for recording and reporting purposes	Recording/reporting	Cross-cutting	Member States: (CAP and non-CAP): manual recording, reporting systems not functioning or not interoperable

<sup>17</sup> Land parcel identification system.



Cause of burden and relevant procedural step		Procedural step	CAP areas of burden most affected	Main legislative sources (mentioned by respondents to interviews and surveys)
<b>Barriers to cooperation</b>	Limited availability of data about the LEADER area	Preparation	LAGs	Member States: (CAP and non-CAP): lack of granular data
	Barriers to cooperation	Preparation Application	EIP OG LAGs	Member States: practical and financial obstacles to cooperation (e.g. farmers not remunerated for their work in OG projects, still limited use of SCOs in EIP OG and LEADER)
	Resource constraints for LAGs	Management of LDS	LAGs	EU (CAP and non-CAP)/ Member States: ambition of LEADER approach vs staff and resource constraints
	Drawing up a non-discriminatory and transparent selection procedure and criteria	Application Management of LDS	LAGs	
	Selection of operations	Application Management of LDS	LAGs	
<b>Strict rule enforcement</b>	Strictness, lack of flexibility or proportionality of inspections	Controls	Cross-cutting	Member States: enforcement of rules and penalty systems perceived as rigid

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), elaboration of RQ1 findings (multiple data sources)

Drawing from their experience, farmers and other CAP beneficiaries made several suggestions for policy simplification. Some solutions appear to already be in place, as **15% of interviewed farmers did not identify any burdensome tasks** and others indicated applying for area-based and animal-based schemes as areas of low or reasonable complexity (which is confirmed by interviews with CSP stakeholders). Also, they deemed requirements that they understand, are familiar with and feel close to ordinary farming practices as less complex.

The proposed solutions pertain in part to the general design of legislation, claiming for **clearer, simpler, more stable rules and flexibility to climate or local conditions**. Other suggestions concern the simplification of aid applications (e.g. reducing documentation and unifying application systems and portals), recording and reporting (e.g. streamlining procedures and databases, eliminating duplications) and inspections (e.g. focusing on support rather than rule enforcement).

Finally, beneficiaries think that simplification should be further pursued through **enhanced communication and training and improved use of digital tools** (e.g. remote sensing to reduce inspections, centralised platforms and interoperability between IT systems).

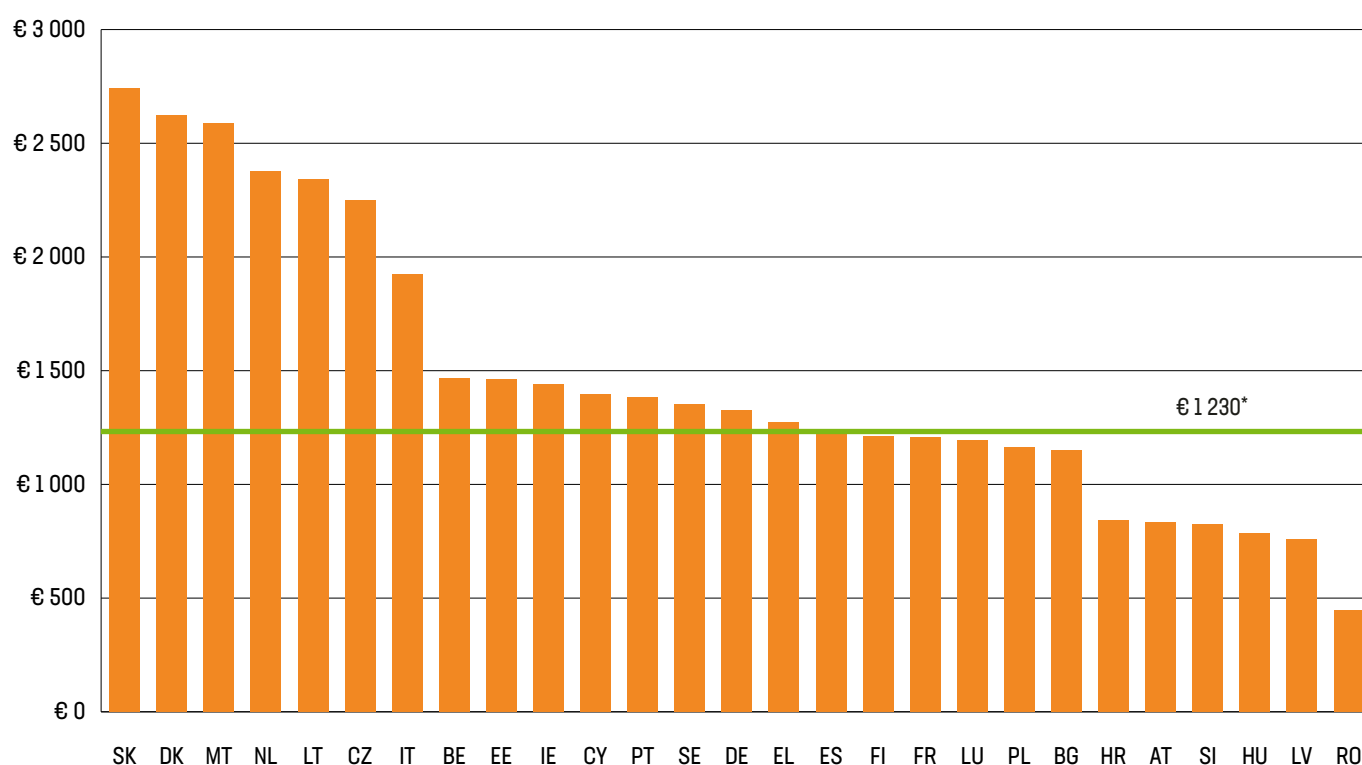


## What is the administrative burden arising from 2023-2027 CAP for farmers and other CAP beneficiaries?

The TC with farmers and thematic surveys of specific beneficiary categories highlight significant differences in the CAP administrative burden across groups. **Farmers incur an estimated average annual cost of EUR 1 230**, with **EUR 630** attributed to internal costs (e.g. working days spent on administrative tasks) and **EUR 600** to external advisory services. This average estimate takes into account the whole EU, with estimations of the average annual costs ranging from EUR 450 in Romania to EUR 2 740 in Slovakia per year. For one-third of the sample, the estimated total administrative burden is less than EUR 1 000. Farmers taking part in the TC declared

to spend an average of **seven working days annually** on administrative tasks, though this varies by farm size and type: smaller farms (<5 hectares) typically spend **one to four days**, while larger farms (>500 hectares) often spend **six days or more**, with field crop and livestock farms reporting higher workloads than horticulture farms. By applying weighting based on the distribution of farm sizes at EU level, along with the application of stricter or more relaxed assumptions, the estimated time spent on CAP-related administrative tasks ranges from 5.6 to 8.7 working days per year for farmers.

**Figure 2. Average total costs spent by farmers on administrative tasks by country**



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

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

In terms of median values, the previous study on the administrative burden of the CAP reported an annual cost of EUR 236 (15 hours) per farmer, while the current study estimates a median annual cost of EUR 433 (28 hours). Notably, the change in estimates is influenced by differences in methodological assumptions, sampling strategies, and the overall analytical approach across the two studies.

Wine growers and producers report spending around 16 days annually on CAP tasks, notably higher than the figure for farmers. This discrepancy may stem from differences in sample composition and methodology, as the survey for wine growers included producers, while the TC focused solely on farmers, including wine farmers. POs in the fruit and vegetable sector report the highest administrative burden among the beneficiaries targeted by this study, reflecting their role as intermediaries managing applications on behalf of multiple members and the wide scope of sectoral

interventions. When examining the burden stemming specifically from **sectoral interventions**, POs and wine growers show differences in their time allocation. **POs dedicate over 10% of their working time to sectoral intervention, with many finding them significantly more complex than other CAP measures.** Wine growers participating in the survey reported spending a much higher share of their total CAP-related time on sectoral tasks. Sectoral interventions are perceived as significantly more complex by wine growers dedicating over 10% of their time to these activities. Conversely, those spending less than 5% of their time on sectoral interventions often view them as much less complex. This highlights how, according to the findings of the dedicated survey, **sector-specific obligations amplify the administrative burden for wine growers, particularly when tasks demand more time.**



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

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

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

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

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

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

The attribution of burden stemming from EU level to CAP and other legislation by MAs/PAs and advisory services points to **dominance of CAP legislation. However, there are several areas of burden where the weight of 'both CAP and non-CAP' together with 'mainly non-CAP' responses is considerable,** especially regarding 'Rural development: investment interventions', 'Eco-schemes' and 'Environmental requirements and schemes'. It should be noted, however, that attribution of burden to the relevant legislation was made by respondents and interviews focused predominantly on CAP-related issues. In some cases, the report has highlighted a possible overestimation of the share of burden attributed to CAP legislation.

The evidence obtained from various sources suggests that a significant portion of the conditions and requirements put in place by Member States is excessive or unnecessary for achieving the objectives of the CAP, and thus represents a potentially substantial amount of gold-plating. However, for a number of reasons, **the actual gold-plating and the scope for burden reduction at CSP level are likely to be more limited in the context of CAP implementation in the current period.** A limiting factor is that, although some of the simplification suggestions identified represent wide-ranging propositions, most other suggestions have been inspired by specific country experiences and their applicability will need to be considered in the particular context of each CSP.

In relation to simplification approaches implemented, the most common answers regarding the positive effects of measures promoted or taken by Member States concern **solutions based on digital tools and automation, simplified cost options and support for small farms.** Insights obtained from MAs/PAs and advisory services into other measures that could reduce the administrative burden borne by CAP beneficiaries have stressed the **importance of training and capacity building, better coordination and communication and strengthening of advisory services.**

The package of simplification and other related measures initiated by the European Commission in February 2024 has been met with a mix of optimism and scepticism from MAs/PAs and other participants in the study. **While the adopted measures address specific burdens and are very likely to offer notable relief in some areas, challenges related to timing, communication and uneven impact persist.** The main positive impacts were seen in connection with GAECs and small farms.

### **Addressing simplification challenges: lessons from recent and current experience**

This study has identified several areas of administrative burden related to CAP or other legislation, seeking to explore the root causes of complexity and assess them. The 2023-27 CAP brought many novelties, which took some time to adapt to, such as enhanced ambition for green agriculture, new aid schemes and a delivery model focused on performance (giving more freedom to Member States for policy design but also more responsibility to ensure compliance).

Both the European Commission and Member State authorities are well aware of the issues and have been responding by pursuing simplification and other measures, with other changes being explored or already in the pipeline.

Taking stock of them, it is possible to see how they address, at least potentially or to some extent, the most challenging aspects.

The table below links some of the simplification actions that Member States have planned or implemented (RQ3) with the causes of burden identified by the study, as well as some of the suggestions made by beneficiaries (RQ1).



**Table 2. Simplification actions and causes of burden addressed**

Action	Cause of burden addressed							
	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
Streamlined databases and integration of IT systems (automation of proof)			X	X				
Advanced digitalisation practices: > Centralised electronic systems > Geo-tagged photos > Pre-filled application forms (reusing data of the previous year if nothing changes) > One-stop-shop platforms for application, tracking and communication > User-friendly apps and portals	X	X	X	X		X	X	
Simplified cost options and draft budgets			X				X	X
Decisions issued via email	X							
Reduction of the total number of interventions		X						
Umbrella projects (reduction of tasks and responsibilities for very small projects)			X		X		X	



Action	Cause of burden addressed							
	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
Alignment of CAP requirements and national standards		X			X			
Use precision agriculture to automate data collection for reporting tasks			X					
Structured dialogue platforms between authorities and beneficiaries	X						X	
Enhanced paperless administration			X					
Aligned application periods and conditions for aid schemes	X	X						
Tiered or proportional compliance systems based on the size of the farm			X		X		X	X
Expand the need-to-know approach			X					
Reduce supporting documents for small projects			X					X
Simplify procedures (e.g. for building permits) through enhanced dialogue with local authorities		X	X					
GAECs: <ul style="list-style-type: none"> <li>› Improve databases for GAEC 2 and 4</li> </ul>					X			





Action	Cause of burden addressed							
	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
<ul style="list-style-type: none"> <li>Provide guidance to implementation (including video and animations). All GAECs</li> </ul>	X				X			
<ul style="list-style-type: none"> <li>Change national rules that impose stricter requirements</li> </ul>		X			X			
<ul style="list-style-type: none"> <li>Allow intercropping as crop rotation/diversification (GAEC 7)</li> </ul>					X			
Tailor requirements to small farms (allow extended deadlines, reduce reporting obligations during busy periods, conduct joint inspections)			X	X	X			
Conduct early information campaigns, clear jargon-free explanation of schemes, requirements and sanctions	X							
Real-world testing of new regulations		X			X			
Foresee derogations for: <ul style="list-style-type: none"> <li>Rented land</li> <li>Organic farms</li> <li>Adverse weather conditions</li> <li>Phytosanitary crisis (e.g. controlled stubble burning)</li> </ul>					X			X
Introduce self-certification of compliance with requirements			X		X			



Action	Cause of burden addressed							
	Clarity and communication	Complexity and consistency of regulatory frameworks	Excessive information obligations	Repetitive tasks	Compliance issues	Digitalisation issues	Barriers to cooperation	Strict rule enforcement
Increase transparency: <ul style="list-style-type: none"> <li>› Automated notifications for deadlines and updates</li> <li>› Advance notice for inspections</li> <li>› Real-time updates on application and payment status</li> <li>› Early-warning systems</li> </ul>	X							
Allow tolerance for minor errors								X

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), multiple data sources



This exercise suggests that all causes of burden could be addressed by one or more of the simplification actions and allows for some concluding remarks.

1. Although the occurrence of administrative burden is widespread, CAP aid applications and associated tasks are particularly burdensome (RQ1) across all categories. The application phase consistently consumes the largest share of time (RQ2). Several actions address administrative burden associated with the application phase, specifically aiming to reduce the number of information obligations for all types of beneficiaries.
2. Linked to this, other actions target preparatory steps that precede the application, with a view to facilitate the gathering of information and the correct understanding of rules.
3. Assessing the impact of the proposed simplification actions on administrative burden is beyond the scope of this study. However, the strong coherence between the perception of complexity (RQ1) and the costs incurred for preparation and application activities (RQ2) suggests that there is a potential to reduce the burden both qualitatively and quantitatively.
4. Common solutions apply to most non-IACS rural development interventions (e.g. SCOs) despite the peculiarities of each. Similarly, the enhancement of digitalisation promises to further streamline and standardise IACS-based procedures, improving user-friendliness, interoperability and services to farmers (e.g. alert, information, monitoring).
5. Compliance with requirements poses more challenges as standardised simplification actions may conflict with the widespread claim for more flexibility and adaptation to specific contexts. The simplification actions proposed for GAECs, beyond disruptive changes that would jeopardise their objectives, tend to focus on purely national issues (e.g. clearer definitions, removal of more restrictive requirements, address overlap with national legislation) and may not allow replication. This is true, to an even greater extent, for nationally designed eco-schemes and AECC.

Most of the simplification actions illustrated above pertain to the responsibility of Member States. This is not surprising as MAs, PAs and Member State stakeholders were invited to reflect on the share of burden arising from CSP implementation and how it could be reduced. However, simplification is a common issue within the EU, and it should continue to be pursued **following a methodical and sustainable simplification approach** involving:

- › **Horizontal solutions**, led by the European Commission and aimed to govern and boost the cross-cutting processes of digitalisation (considering issues linked to digitalisation, e.g. farmers' digital skills) and knowledge sharing (e.g. training, communication, advice, support to stakeholders). 'Fear of audit', one of the causes of overregulation (RQ3), should also be addressed at a horizontal level.
- › **Customised solutions** led by Member States and aimed to address the root causes of gold-plating, favour the sharing of experiences and good practices among Member States, as well as peer reviews and coordinated actions targeting simplification.



