



Brussels, 22 March 2019

## STUDY “ANALYSIS OF ADMINISTRATIVE BURDEN ARISING FROM THE CAP”

### Evaluation Sheet

Concerning these criteria, the study report is:	Poor	Satisfac- tory	Good	Very Good	Excel- lent
<b>1. Relevance:</b> Does the study respond to information needs, in particular as expressed in the terms of references?			X		
<b>2. Appropriate design:</b> Is the design of the study adequate for obtaining the results needed to answer the study questions?			X		
<b>3. Reliable data:</b> Are data collected adequate for their intended use and have their reliability been ascertained?		X			
<b>4. Sound analysis:</b> Are data systematically analysed to answer study questions and cover other information needs in a valid manner?				X	
<b>5. Credible findings:</b> Do findings follow logically from and are justified by, the data/information analysis and interpretations based on pre-established criteria and rational?			X		
<b>6. Valid conclusions:</b> Are conclusions non-biased and fully based on findings?			X		
<b>7. Clarity:</b> Is the report well structured, balanced and written in an understandable manner?			X		
<b>Taking into account the contextual constraints of the study, the overall quality rating of the report is:</b>			X		

## JUSTIFICATION FOR THE EVALUATION

**1. Relevance:** The study report deals well, within its constraints, with the analysis of the administrative burden arising from the CAP. The contractor has met, to the extent possible due to availability of data, to the information needs identified in the tender specifications. This study collects evidence and measures the costs related to the IACS implementation after the CAP 2013 reform for both National administrations and farmers. It analyses the different forms of IACS, LPIS and related control mechanisms, as well as the costs associated to cross-compliance. In addition, it addresses the recommendations made by the European Court of Auditors in 2015 and 2016 to DG AGRI on LPIS and Cross-compliance<sup>1</sup>.

**2. Appropriate design:** The study method chosen is coherent with study needs and requests. The method is adequately described. The information sources and analysis tools chosen by the contractor are adequate for analysing, within available limits, administrative burdens arising from the CAP.

**3. Reliable data:** Available information and sources are well identified in the study. The quantification of the administrative burden arising from the CAP was carried out initially through a combination of desk research and literature reviews, interviews with farmers, as well as 12 cases studies. However, the situation was challenging as there are limited availability and inconsistency of data on administrative costs related to CAP implementation. The contractor therefore carried out an additional activity to complete and validate draft findings through a questionnaire sent to all MS. Key findings of the farmers' interviews were also discussed with COPA-COGECA for validation. The quality of existing or collected data was assessed as satisfactory, although a level of uncertainty and gaps of information remain.

**4. Sound analysis:** There is a clear, solid and coherent analysis of the administrative burden arising from the CAP. The analysis was partly challenging given the initial lack of availability and consistency of data. The analysis uses appropriate quantitative or qualitative techniques, suitable to the study context. The context is well taken into account in the analysis. The report reflects a range of stakeholders consulted. The limitations of the analysis are presented.

**5. Credible findings:** In general, the findings are based on clearly defined evaluation criteria and supported by the evidence provided through the analysis. In some cases, the findings are broader and do not completely tackle the specific issue requested, due to the lack of data. Stakeholder opinions were considered and reflected.

**6. Valid conclusions:** The conclusions properly addressed the study themes. They are based on the evaluation findings, drawn from the analysis. The recommendations, based on the study findings and conclusions, are fair and balanced. They are orderly presented and related.

**7. Clarity:** The report includes all elements required by the tender specifications. Due to the initial lack of data and the need to carry out an additional validation activity to complement and validate draft findings, the contractor proposed to modify the structure of the final report at a late stage. Although the new structure of the final report is clear and readable, some parts contain redundant information and could have been better structured and more concise to further facilitate the clarity and readability of the report.

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<sup>1</sup> 2015 ECA report: "Develop a framework for assessing the cost of running and up-dating the LPIS"

2016 ECA report: "Measuring the cost-effectiveness of implementing the LPIS" and "Developing a methodology to measure the costs of cross-compliance"