



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

The Director-General

Brussels,

Subject: Observations on the proposal by Greece for a CAP Strategic Plan 2023-2027 - CCI: 2023EL06AFSP001

Your Excellency,

I hereby acknowledge receipt of the proposal for the 2023-2027 CAP Strategic Plan of Greece, submitted via SFC2021 on 30 December 2021.

An assessment by the Commission services of the proposed CAP strategic plan has identified a number of issues that require further clarification and adaptation. The enclosed annex sets out the relevant observations, which are communicated pursuant to Article 118(3) of Regulation (EU) 2021/2115.

I invite Greece to submit a revised proposal of the CAP strategic plan for approval, taking into account these observations.

In accordance with Article 121 of Regulation (EU) 2021/2115, the time limit of 6 months for the Commission decision to approve your CAP Strategic Plan does not include the period starting on the day following the sending of these observations and ending on the date on which Greece responds to the Commission and provides a revised proposal.

The Commission is committed to a continued structured dialogue with national authorities in the further approval process of your CAP Strategic Plan. The Commission is open to receiving your written reaction on the key elements of the observations within 3 weeks and intends to publish them subsequently alongside our observations on all the CAP Strategic Plans received in time, unless you would object to publication of your reaction. I invite your services in charge to engage in bilateral exchanges as soon as possible in order to discuss the observations set out in the Annex.

Yours faithfully,

Wolfgang BURTSCHER

Enclosure: List of observations pursuant to Article 118(3) of Regulation (EU) 2021/2115

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ANNEX

Observations on the CAP Strategic Plan submitted by Greece

The Russian invasion of Ukraine and the ongoing generalised commodity price surge bring to the forefront in the strongest possible way the integral link between climate action and food security. This link is recognised in the Paris Agreement and has been incorporated in the new legislation for a Common Agricultural Policy (Regulation (EU) 2021/2115) and the Farm to Fork Strategy (COM/2020/381 final) with a view to ensuring sufficient supply of affordable food for citizens under all circumstances while transitioning towards sustainable food systems.

In this context, and in the context of the climate and biodiversity crises, Member States should review their CAP Strategic Plans to exploit all opportunities:

- to strengthen the EU’s agricultural sector resilience;
- to reduce their dependence on synthetic fertilisers and scale up the production of renewable energy without undermining food production; and
- to transform their production capacity in line with more sustainable production methods.

This entails, among other actions, support for carbon farming, support for agro-ecological practices, boosting sustainable biogas production¹ and its use, improving energy efficiency, extending the use of precision agriculture, fostering protein crop production, and spreading through the transfer of knowledge the widest possible application of best practices. The Commission assessed the Strategic Plans of Member States with these considerations of the sector’s economic, environmental and social viability in mind.

The following observations are made pursuant to Article 118(3) of Regulation (EU) 2021/2115. Greece is asked to provide the Commission with any necessary additional information and to revise the content of the CAP Strategic Plan taking into account the observations provided below.

Key issues

Observations with regard to the strategic focus of the CAP strategic plan

1. The Commission welcomes the efforts Greece had made in its preparation of its CAP Strategic Plan (the Plan), the exchanges ahead of its submission and consideration given to its recommendations of 18 December 2020². The Commission takes note of

¹ Sustainable biogas production means the production of biogas that respects the sustainability and greenhouse gas emissions saving criteria laid down in Article 29 of Directive (EU) 2018/2001 (Renewable Energy Directive).

² COM(2020) 846 final and SWD(2020) 372 final.

the public consultations conducted in the preparatory stage and invites Greece to strengthen the partnership principle during the implementation phase.

2. The Commission recognises the efforts of Greece in preparing an approach attempting to consolidate and provide a consistent strategy across Direct Payments, Sectoral Programmes and Rural Development interventions and notes in this context the decision to transfer 8% of the first pillar allocation to the second pillar.
3. Notwithstanding, further efforts are needed to reinforce the intervention logic, especially since observations and conclusions of the SWOT analysis and needs assessment are not fully integrated in the Plan's intervention logic. The Commission observes that several key elements such as inconsistencies in the intervention logic, incomplete targets and financial plan, insufficient information as regards the environmental-climate ambition, missing essential annexes and non-respect of some of ring-fencing elements require completion and revision as detailed in the following sections.
4. The Commission recalls the importance of the targets set for result indicators as a key tool to assess the ambition of the Plan and monitor its progress. The Commission requests Greece to revise the proposed target values, by improving their accuracy and taking into account all the relevant interventions, and by defining an adequate ambition level in line with the identified needs.

Observations with regard to the fostering of a smart, competitive, resilient and diversified agricultural sector that ensures long term food security

5. On the basis of the information provided in the Plan, the Commission considers that it contributes only partially to the general objective of fostering a smart, competitive, resilient and diversified agricultural sector that ensures long-term food security.
6. The Commission considers that the level of ambition as regards the redistribution from larger to small and medium-sized farms of Direct Payments should be further increased. Greece is therefore invited to reassess its redistribution strategy and to complement the explanations provided so far, in particular by a quantitative analysis showing the combined effects of all proposed income support tools on redistribution. This will allow to fully assess whether the aim of redistribution from larger to small and medium-sized farms and better targeting of Direct Payments is addressed sufficiently.
7. Regarding competitiveness, the intervention logic is comprehensive except for interventions under Article 47(1)(a) of Regulation (EU) 2021/2115 (CAP Strategic Plan Regulation – SPR) where it is not consistent with the description of the sectoral intervention. In addition, Greece insufficiently described the intervention logic to improve farmers' position and it is not clear what its intentions are in the wine sector.
8. Greece is invited to review and reconsider its overall approach to Coupled Income Support (CIS) in view of the weaknesses identified in the SWOT including in terms of the coverage and grouping of interventions across different sectors and products.
9. Greece is invited to better explain how needs in relation to agricultural production and income risks will be addressed. In the light of the Russian war in Ukraine, the increasing market exposure of the agricultural sector and the challenges of climate

change, the Commission asks Greece to use the CAP to expand and strengthen its national risk management system and to consider interventions reducing dependence on fossil fuels and other externally sourced inputs to preserve the long-term production capacity and economic viability of farms. In this context, the Commission welcomes the efforts to address the import dependency in some sectors, such as protein crops.

Observations with regard to the support for and strengthening of environmental protection, including biodiversity, and climate action and to contribute to achieving the environmental and climate-related objectives of the Union, including its commitments under the Paris Agreement

10. The Commission considers that the proposed Plan shows limited potential to contribute effectively to this general objective, although there is a noteworthy effort of setting up eco-schemes.
11. As detailed in the subsequent sections, the Commission considers the Plan is not sufficient regarding its capacity to deliver an enhanced level of environmental and climate ambition, as required by Article 105 of the SPR. Taking account of the changes requested in this letter, Greece is requested to better demonstrate the increased ambition of the planned green architecture as regards environmental and climate related objectives using qualitative and quantitative elements such as financial allocation and indicators.
12. The Commission has identified incoherencies and insufficiencies of the Plan's contribution to the objectives and targets of the EU environmental and climate legislation mentioned in Annex XIII to the SPR.
13. Furthermore, the Commission has doubts on the effective contribution of the Plan to the reduction of nutrient losses, water use efficiency, enhancing organic farming and biodiversity. The Commission notes in particular the lack of sufficient ambition regarding greenhouse gas emissions, carbon sequestration, and climate change adaptation (besides others with regard to forest fires prevention, enhancing water retention of the landscape, floods, drought and erosion prevention) as compared to the baseline situation, the needs identified, which thus require the modification of the Plan.
14. Greece is strongly encouraged to take into account the national targets that will be laid down in the revised Regulation (EU) 2018/842 (the Effort Sharing Regulation) and Regulation (EU) 2018/841 (the Regulation for the Land Use, Land Use Change and Forestry (LULUCF)) (revisions which are currently discussed by the EU co-legislators) in view of the legal requirement in Article 120 of the SPR to review the Plan after their application.
15. Greece is requested to take better account of the Prioritised Action Framework (PAF) and further align the proposed interventions with it.
16. Furthermore, the Commission calls on Greece to reinforce the interventions related to integrated sustainable nutrient management to reduce losses into the environment (nitrates, ammonia) and increase the efficiency of its use, and to promote circular approaches to nutrient use, including organic fertilising.
17. The Commission also strongly encourages Greece to fully benefit from possibilities of interventions under the SPR to increase sustainable domestic generation and use of

renewable energy, as well as to take further steps to reduce energy consumption, including biogas in addition to solar and wind thereby strengthening what has already been programmed in the National Energy and Climate Plan.

18. The Plan should be reinforced as regards the interventions dedicated to the conservation of habitats and species of EU importance and addressing soil needs (including desertification and erosion).
19. Considering the identified pressures on water resources, Greece should give a higher priority to tackling abstraction pressures, and protecting water resources from agricultural pressures by reinforcing the Plan's interventions.
20. Greece should provide support for more forest-related measures, sustainable forest management and forest monitoring investments enhancing their resilience against nature- and climate – related risks such as wildfires, drought, floods, soil erosion, pest diseases and protecting, preserving and enhancing their ecosystem services, functions and biodiversity. In light of climate change and biodiversity loss identified in Greece, there is an urgent need for interventions strengthening the resilience of forests. In addition, forests and the forest-based sector provide multiple socio-economic functions and benefits, including additional jobs and growth opportunities in rural areas and recreational functions contributing to citizens' physical and mental health.
21. The Commission requests Greece to clarify or amend certain Good agricultural and environmental condition (GAEC) so they fully comply with the regulatory framework (see more explanation in the detailed observations).

Observations with regard to the strengthening of the socio-economic fabric of rural areas

22. The Commission considers that the Plan contributes only partially to this general objective.
23. Despite the significant needs identified in the socio-economy of rural areas and as compared to urban areas, the Plan seems to rely only on LEADER/CLLD intervention to cover broader rural development needs. Greece should either consider introducing other non-LEADER interventions (such as investments diversification or basic village infrastructure) for strengthening the rural society so as to allow LEADER to be deployed according to its own principles and to optimise its added value or increasing LEADER financial allocations to a level appropriate to the broader needs, taking into account the complementarities with other Funds dedicated to rural areas.
24. The Commission is concerned about the low level of commitment in the Plan to promoting gender equality and improving the participation of women in farming, in line with the specific objective of Article 6(1)(h) of the SPR. The Commission encourages the Greek authorities to consider addressing this objective by justified and proportionate measures. Furthermore, Greece should review its strategy for young farmers and ensure that the interventions correspond to the identified needs.

Observations with regard to fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas

25. The transition to more resilient and sustainable agriculture and rural areas requires considerable effort into advice, training and innovation. The Commission welcomes the many good ideas and initiatives summarised in the Plan to improve the Greek Agricultural Knowledge and Innovation Systems (AKIS), and invites Greece to turn these ideas into concrete interventions in the Plan.
26. The Commission invites Greece to further elaborate its digitalisation strategy for agriculture and rural areas and reflect on how it will be addressed comprehensively across the Plan and in synergy with other policy instruments.

Other issues

27. Greece is invited to describe the coordination, synergies and complementarities with other funds, including funds regulated by the Common Provisions Regulation (CPR), the Recovery and Resilience Facility (RRF) and national funds, in addressing certain identified needs, especially those related to the development of rural areas, social inclusion and water sources. The Plan should describe the concrete contribution of each of these funds.

Information with regard to the contribution to and consistency with Green Deal targets

28. The Commission regrets that Greece did not make use of the possibility to provide national values for any of the Green Deal targets contained in the Farm to Fork Strategy and the Biodiversity Strategy and requests Greece to quantify ambitious national values for each of the respective EU Green Deal targets. Moreover, the Commission calls on Greece to adjust the design of its Plan and its interventions to provide a more ambitious contribution to these Green Deal targets.
29. Pending further qualitative explanation and the introduction of such quantified values, the Commission has the following observations on the consistency with and contribution of the Plan to the following Green Deal targets:
 - **Organic farming:** The Commission welcomes the proposed increase of the area under organic farming to be supported under the CAP. However, in the light of environmental benefits of organic farming, its current share of UAA (Utilised Agricultural Area) and its potential for growth, the Commission invites Greece to increase its effort in this respect, thus further contributing to reaching the EU target;
 - **High-diversity landscape features:** The Commission notes that the Plan has the potential to contribute to preserving high – diversity landscape features. Greece is strongly encouraged to increase the ambition of relevant interventions and dedicated financial allocation to increase further the currently low share of land under high diversity landscape features;
 - **Pesticides:** The Commission notes a relatively low contribution to the decrease in the use and risk of pesticides (including the risk and use for more hazardous pesticides) that require enhanced action;
 - **Nutrient losses:** The Commission is concerned about the low level of commitment in the Plan to reduce nutrient losses, and calls on Greece to reinforce relevant interventions;

- **Antimicrobial use:** The Commission notes that interventions aimed at reducing the use of antimicrobials are very generic in the different animal production sectors/species. Given that the antimicrobial consumption in Greece is currently higher than the EU target for 2030, the Commission encourages Greece to reinforce its Plan accordingly.
- **Broadband:** Since the Plan does not support broadband-related actions in rural areas, Greece is invited to explain how and through which EU or national instruments it intends to fulfil the 2025 target of 100% access to fast broadband internet in rural areas.

Detailed observations

MISSING ELEMENTS OR INCOMPLETE PARTS OF THE PLAN:

30. The presented Plan does not allow a thorough assessment of the consistency between identified needs and strategy or of its potential and contribution. Greece is invited to appropriately fill in all sections which are empty or incomplete (as indicated in different parts of this letter, below) but necessary for the assessment of the Plan.
31. Greece is invited to provide the essential missing elements of the Plan: the ex-ante evaluation and the Strategic Environmental Assessment (SEA) referred to in Directive 2001/42/EC (SEA Directive) should be annexed to the Plan as required by Article 107(2)(a) of the SPR.
32. Greece is asked to provide the additional information that is currently missing from the Plan, as identified in the sections below. The lack of a complete targets plan, financial plan, descriptive elements of the operations, the regional dimension, and above all any substantial information as regards environmental-climate ambition and consistency with current and future targets, did not allow to carry out an assessment with regard to the potential and contribution of this plan to relevant targets.
33. Section 3.6 Risk management: Greece is asked to include a description giving an overview of the national situation as regards risks in agriculture, such as the increasing market exposure of the agricultural sector, climate change and associated frequency and severity of extreme weather events, as well as sanitary and phytosanitary crises, and explain the national approach to addressing these risks, including how different interventions (including sectoral programmes) and any national instruments or arrangements will contribute to helping farmers face those risks. In view of these increasing risks, Greece is invited to consider introducing risk management tools funded by the EAFRD in order to better help farmers to manage those production and income risks.
34. Agricultural risk management tools may address the growing risks that the changing climate represents in agriculture. Greece is invited to consider incentives for farmers to take proactive measures reducing their vulnerability and increasing their adaptive capacity to climate change.
35. Target values for result indicators are provided, but without comparative values or an indication of what is their expected impact. Therefore, result indicators do not allow to quantify the expected improvement. Overall, it is difficult to make a

straightforward judgement on whether climate ambition is higher based on the eco-schemes and the Rural Development interventions information. The Greek Plan should elaborate clear and explicit explanations on its contribution to climate mitigation or adaptation.

1. STRATEGIC ASSESSMENT

36. For each specific objective (hereafter SO), Greece should provide an overview of the intervention logic and a brief justification of the financial allocation in order to explain how the interventions will achieve the targets, consistent to the financial plan.
37. The needs assessment should be significantly improved. Greece should expand more on how the needs that were not addressed or partially addressed by the Plan are addressed by other relevant measures/instruments outside of the Plan.
38. The Commission has identified errors and inconsistencies in several targets of result indicators and unit amounts. Greece is requested to carefully review these.

1.1. To foster a smart, competitive, resilient and diversified agricultural sector ensuring long term food security

1.1.1. Strategic assessment of Specific Objective 1

39. As regards coupled income support (hereafter CIS), Greece is invited to explain and justify which sectors would be targeted and why, ensuring consistency between the SWOT, needs assessment and intervention logic. In particular, Greece should support by statistical evidence the justification of difficulties of the sectors concerned and provide information on how the interventions are to improve the difficult situation of those sectors.
40. Regarding the redistributive strategy, further to the observations made in ‘Key Issues’ part of this letter, the overview under Section 3.4 of the Plan should not only indicate that the redistributive needs have been addressed, but also that they have been addressed sufficiently. To justify the sufficiency of the strategy and the consistency of income support tools, a quantitative analysis showing the combined effects, by physical farm size, of all relevant income support tools on direct payments per hectare, direct payments per work unit and income per work unit is requested at national level (e.g. using the Farm Accountancy Data Network). Moreover the current overview does not provide enough explanations on the strategy for small farms (e.g. minimum requirements, payments for small farmers, etc.).
41. More evidence (e.g. based on the quantitative analysis mentioned in the point above) is needed to justify the strategy to apply the Complementary Redistributive Income Support for Sustainability (hereafter CRISS) by group of territories, given the overall objective of a national redistribution of support from bigger to smaller and medium-sized farms.
42. In section 3.5, Greece provided an overview of the sector-related interventions (i.e. sectoral, CIS and the Rural Development interventions, as applicable), including their complementarity in relation to the needs identified for the sectors concerned. As such, the information provided is either incomplete (e.g. CIS interventions were not

included in the overview for the fruit and vegetables sector, only sectoral interventions are included for the olive oil and table olives sector) or missing for several sectors (i.e. beef and veal, sheep and goat, cereals, oilseeds, protein crops, rice, dried fodder, sugar beet, nuts, seeds and silkworms). In particular, the description of how the mix of different interventions will help addressing the identified needs is to be further strengthened or included.

1.1.2. Strategic assessment of Specific Objective 2

43. The SWOT is comprehensive. Concerning Rural Development, two different distinguished interventions for ordinary investments are proposed (on and off farm) with substantial financial allocation.
44. The intervention logic for SO2 does not include the type of interventions under Article 47(1)(a) of the SPR for the olive oil and table olives sector. This is not consistent with the description in the sectoral intervention for this sector.

1.1.3. Strategic assessment of Specific Objective 3

45. In the Plan, Greece described the strategic assessment to improve farmers' position in the value chain but only in general terms. However, it is not clear what Greece intends to do in the wine sector. The Commission invites Greece to explain the farmers' position in the value chain also in the wine sector.
46. In the light of the identified priority in terms of promoting cooperation/networking/collective organisation of producers and agri-food sectors and of the weakness in terms of low competitiveness, Greece should explain its decision not to support producer organisations (hereafter POs) via interventions for certain sectors beyond Fruit & Vegetables, apiculture, wine and olives sectors.
47. Given the high degree of concentration in the retail sector as identified under the SWOT, Greece could explain why it does not consider to support the creation of short supply chains.
48. As required by Article 109(2)(e) of the SPR, Greece is invited to provide in Section 3.5.3 of the Plan, on the intervention strategy, justification for targeting the sectors selected, the list of interventions per sector, and their complementarity.
49. Taking into account that several interventions are relevant to protein crops, Greece is invited to complete the section 3.5.9 on the overview of interventions related to the protein crops sector.
50. For olive oil and table olives on section 3.5.5: the information on trade refers to the EU, no information specific for Greece is provided. The information on prices does not specify the period it is referring to. Greece is asked to provide information on trade and specify the period the price information refers to.
51. In Section 3.5.6, the Overview of the sector-related intervention (coupled support + sectoral interventions + rural development) is missing for all types of animal products.

1.2. To support and strengthen environmental protection, including biodiversity, and climate action and to contribute to achieving the environmental and climate-related objectives of the Union including its commitments under the Paris Agreement

1.2.1. Strategic assessment of Specific Objective 4

52. Despite the fact that climate change mitigation appears to have a high priority in the ‘identification of needs’, the SWOT is neither complete nor clear as regards climate change mitigation. Greece should explain the main challenges it faces to mitigate agricultural emissions. The Plan does not explicitly clarify how its intervention strategy will contribute to the national emission reduction targets and it makes no reference to the Effort Sharing or LULUCF Regulations and the current or revised targets for Greece. Greece is strongly encouraged to take into account the enhanced objectives of the revision future national targets of the Effort Sharing Regulation and the LULUCF Regulation (which are currently under consideration by the co-legislators) in view of the future legal requirement to review the Plan after their adoption.
53. Water scarcity is a critical aspect for Greece and the estimated reduction of water resources is likely to have a negative impact on Greek agriculture in the Mediterranean biogeographical regions. While noting some measures addressing water scarcity (such as the replacement of crops by others more resistant to water stress situations), further measures to address water availability and water consumption are needed as they are not sufficiently addressed in the Plan.
54. The RD intervention P3-70-4.1 Afforestation and creation of woodland covers only expenditure of actions brought forward from the RDP 2014-2022. Greece should explain how the weaknesses mentioned in SO4, related to climate action, will be addressed given that there are no new afforestation or agroforestry investments planned or other climate and environmentally friendly forest management practices.
55. From 2000 to 2010, there were over 100,000 fire occurrences in Greece, consuming an average of 62,000 ha of arable and forest land each year. Greece should reinforce the intervention on forests in the light of the recently adopted Forest Strategy. Additionally, Greece is invited to specify how it addresses the prevention of wildfires and soil erosion. Greece is therefore invited to introduce the forest cadastre and to review the legal framework for prevention and suppression of wildfires and/or forest fires.
56. Greece is encouraged to consider additional needs under this objective (relating to knowledge, research and innovation on climate change). For example, Greece is at severe risk of soil erosion and this issue is not sufficiently addressed in the Plan. Greece should reconsider its intervention logic to expand sustainable management practices related to forest ecosystems (possibly via eco-schemes).
57. The need to reduce vulnerability to climate change effects (N04.03) is not addressed in a satisfactory manner. The level of priority is not stated and the actions are not well identified. Increasing resilience and adaptation seems to be mainly covered indirectly, through GAEC and actions towards carbon sequestration. A more systematic approach to adaptation of forests to climate change is also missing, where a decline in climate action (mitigation and adaptation) related to forests, afforestation and agroforestry have been observed despite this has been identified in the needs analysis.

Greece is invited to provide more information concerning adaptation measures and how the identified need will be covered.

58. Greece is invited to provide an estimate of the mitigation potential under the concerned interventions.

1.2.2. Strategic assessment of Specific Objective 5

59. The actual contribution of the main interventions designed to address the water use (quality and quantity) is not clearly explained.
60. The description of the CIS for crops and livestock should be more specific indicating that the sectors covered are compliant with the obligations under the Water Framework Directive (WFD), the action programmes of the river basin management plans or national legislation, as appropriate.
61. Greece is therefore invited to better explain how, and ensure that the Plan will address the needs identified with respect to protection of water resources and how it will be coherent with the latest River Basin Management Plans (hereafter, RBMP) and contribute to WFD objectives of reaching good status by 2027, taking into account climate change projections for water scarcity.
62. Greece should clarify the focus of the investments in irrigation (whether it concerns improvement of existing installations or expansion) and explain which other interventions under the Plan are planned to address water quantity issues, including natural water retention, measures to reduce demand, training and advice etc. Greece is strongly encouraged to design interventions so that reclaimed water be used to substitute freshwater abstraction.
63. Regarding air quality, the result indicator R.13 is well quantified, but the proposed set of measures to reduce ammonia and methane emissions are insufficient. The reduction of ammonia emissions could also be supported with green productive investments for covered slurry storages to avoid ammonia volatilisation. An agri-environmental or eco-scheme measure to pay farmers for reduction measures addressing the nitrogen cycle, from animal feeding and housing to manure storage and management to application of fertilisers and manure to the fields, notably the direct injection of slurry in the soil should be envisaged. Indicator R.20 should be activated with a sufficiently high target value. Practices to reduce air pollution (like ammonia emissions from manure e.g.: rapid incorporation and precision fertilisation) could be more promoted in order to raise ambition in addressing a highly ranked need.
64. Greece is therefore requested to review its intervention logic, so as to consider specific actions to effectively tackle abstraction pressures, increase the potential of water savings and improve water and air quality, as well as reviewing the target set for the relevant result indicators.

65. Greece is requested to explain how the Plan contributes to the achievement of the objectives of the Nitrates Directive³ as required by the SPR and the EU 2030 target of reducing nutrient losses by at least 50%. The Commission considers that the effort in that direction represented by indicator R22 remains insufficient.
66. Although measures on soil are included in the interventions, the needs assessment addresses erosion but no other soil-related needs: desertification, salinization, alkalization linked loss of carbon matter, soil diffuse and point pollution, and promoting conservation agriculture to reduce tillage, increase cover crops and agroforestry. Greece is asked to indicate how the other soil-related needs may be addressed.
67. Considering the needs identified on nutrients, the interventions of the Plan should be reinforced to support decisive action towards integrated sustainable nutrient management to reflect the higher contribution to the national objectives of the instruments in the Annex XIII to the SPR.
68. The Commission invites Greece to explain the links with the Best Available Techniques (BAT) conclusions including BAT-associated emission level (BAT-AEL) notably in the context of reducing emissions of pollutants from installations (e.g. ammonia) but also to spreading of manure on agricultural land, on-farm processing of manure, slurry storage and water and energy efficiency.

1.2.3. Strategic assessment of Specific Objective 6

69. Greece should review its intervention logic so as to take into consideration the threats identified in the PAF and National Species Action plans but also the objectives of the EU Biodiversity Strategy⁴. Greece should also clarify whether the possibility to coordinate the Plan with LIFE Strategic Nature Projects was taken into consideration.
70. Greece is invited to explain the link of the interventions of the Plan to the EU Biodiversity Strategy target of reversing the decline in pollinators, including how the key drivers of pollinator decline that result from agricultural activities (e.g., loss of habitats, chemical pesticides).

1.2.4. Green architecture

71. To make the green architecture clearer, the challenges relating to water, soil and air need to be addressed and further clarified in the Plan, as indicated above.
72. Some outputs in term of hectares planned need to be better justified or explained in relation with the context and the need for area coverage (organic farming maintenance, application of ecological focus areas for trees, grassland management & improvement, outputs for green cover in orchard, precision farming, protection of agroforestry ecosystems and terraces/landscape elements).

³ Council Directive 91/676/EEC concerning the protection of waters against pollution caused by nitrates from agricultural sources.

⁴ COM(2020) 380 final, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, EU Biodiversity Strategy for 2030 Bringing nature back into our lives.

73. As there are no NATURA 2000/WFD compensation interventions or any management commitments for forestry, Greece should include such interventions which can address biodiversity and nature challenges or indicate how the related needs are otherwise adequately covered (as per Article 108(e) of the SPR).
74. Greece should clarify the precise agro-environmental-climate (hereafter, AEC) management commitments and ensure that these go beyond the well-defined baselines. Greece should use uniform unit amounts (hereafter, UAs) rather than average.
75. The contribution to and consistency with national targets set out in other relevant legislative instruments (those listed in Annex XIII) should be explained specifically for each instrument. Regarding renewable energies, Greece should present at least the links and complementarity of the Plan interventions with the existing initiatives concerning energy efficiency, renewable energy and the National energy and climate plan.
76. Regarding WFD and Nitrates directive⁵, the Plan contributes to the long-term objectives but Greece is invited to describe this contribution in the relevant sections of the Plan (e.g. section 3.1.4).
77. In section 2.3.3, Greece identified the elements of the Plan that should contribute to the 2030 targets of the Farm to Fork⁶ (hereafter, F2F) and Biodiversity & new EU Forest strategies; the Greek authorities are encouraged to quantify the size of such contribution, i.e. specify how much closer to the targets shall the Plan bring Greece/national targets or ambitions.
78. Whilst the proposed eco-schemes will support wider biodiversity in farming areas, there is no eco-scheme targeting species or habitats of EU importance (e.g. grazing of grasslands in NATURA 2000) and Natura forest areas. There is also only one AEC measure targeted to species of EU importance (70-1.1 Protection of wild birds within Special Protection Areas – hereafter, SPAs) with a limited budget. The Commission invites Greece to include a specific eco-scheme on nature and biodiversity (for example, to retain other existing High Nature Value farming and agro forest landscapes or to encourage the adoption of specific practices that would help restore to favourable conservation status priority species and habitats). An eco-scheme on nature or Natura 2000, for rewarding basic commitments, would be useful in order to demonstrate increased environmental ambition of the CAP especially towards achieving the conservation of protected area targets of the EU biodiversity strategy for 2030. Greece is invited to explain the Plan contribution to the objectives of the Birds Directive⁷, in particular the conservation and restoration of habitats of EU importance, conservation and recovery of protected species associated to agrosystems, grasslands and forests and other than birds, control of invasive species, and ecological connectivity.

⁵ Council Directive 91/676/EEC of 12 December 1991 concerning the protection of waters against pollution caused by nitrates from agricultural sources.

⁶ COM(2020) 381 final, Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system.

⁷ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.

79. As regards soil, the Commission notes favourably the efforts put into addressing soil erosion, although they need to be reinforced, and other soil-related needs be explicitly addressed in the interventions. Greek authorities are invited to reinforce the soil interventions in the light of the recently presented Soil Strategy.

1.2.5. Greater overall contribution

80. Greek authorities should present clearly what they expect to achieve in environmental and climate terms through their Plan in comparison with the current situation, with reference to specific data and targets, focusing on interventions beyond conditionality.

81. Contribution and consistency with the long-term national targets set out or deriving from the legislative instruments referred to in Annex XIII: The Greek authorities should revise this section (3.1.4) so as to explicitly refer to the legislative instruments of the EU environmental legislation mentioned in Annex XIII and align the result indicators to target better the current situation in Greece.

1.3. To strengthen the socio-economic fabric of rural areas

1.3.1. Strategic assessment of Specific Objective 7

82. Greece is invited to:

83. reconsider and improve the intervention strategy by explaining more concretely its intervention logic and the link between the selected interventions and the identified needs, including access to land and capital;

84. justify the target and the financial allocation and make it consistent throughout the Plan (for example under section 3.2. the financial allocation is set at 73 million EUR whereas under section 5 CISYF – at 56 749 801 EUR).

1.3.2. Strategic assessment of Specific Objective 8

85. As tackling poverty, unemployment, employment gender gap, ageing population and contributing to improving access to healthcare in rural areas through investments in economic and social infrastructures and services are key to improve the situation in rural areas, the Commission encourages the Greek authorities to identify more social related needs, with high relevance, under 2.1.SO8.2.

86. Greece could complement its SWOT analysis on the bio-economy by assessing the biomass potential from both agriculture and forest sectors. The need "IF 041.08.01 - Promotion and financing of bio economy/circular economy and RES investments" is given a high priority. Greece should check whether this is coherent with the low priority given under SO4 to intervention "IF 092.04.05 - Support for RES production in agriculture and forestry".

87. Despite very significant needs identified in SO8 and rural areas lagging behind urban areas, few interventions are planned in broader rural development (except for agri-food sector/forestry) – in fact it is only the LEADER intervention.

88. Greece should consider non-LEADER interventions (e.g. investments diversification or basic village infrastructure; not linked directly to agriculture) in broader rural development so that LEADER itself can be focused/designed fully in compliance with the LEADER principles so as to deliver its added value.
89. Considering its importance along all pillars of sustainability and contributing to relieving pressures of biological resources while helping promote green growth and create jobs in rural areas, Greece is invited to outline the links and complementarity of the CAP with national/regional bio economy initiatives, if any.

1.3.3. Strategic assessment of Specific Objective 9

90. Greece is invited to explain whether and to what extent the planned interventions will promote the shift to healthier, more plant-based and sustainable diets, explaining the expected impact and synergies of the different proposed interventions. The Commission notes that food waste received low priority and is not addressed in the Greek Plan. Food waste is one of the areas to be covered by Technical Assistance measures proposed in the Plan and some interventions may refer partly to food waste prevention. The Commission invites Greece to clarify if there are any measures intended to address food waste prevention and food waste reduction outside the Plan.
91. The Commission notes that the Greek Plan includes several measures that should enhance the implementation of integrated pest management, alternatives to pesticides and contribute to reducing the use and risks of chemical pesticides and more hazardous pesticides. In addition, targets have been set for the result indicators R24 (on pesticides) and R29 (on organic farming). The interventions proposed will make some contribution reducing the overall use and risk of pesticides. The Commission invites Greece to specify clearly the expected impact of the measures proposed in achieving reductions in the use and risk of chemical pesticides and the use of more hazardous pesticides.
92. Regarding antimicrobial resistance (hereafter, AMR) the Commission notes that the proposed interventions are very generic and do not reflect or tackle the specific reasons/drivers for the inappropriate use of antimicrobials in the different animal production sectors/species. Given that the antimicrobial consumption in Greece is currently quite high, the Commission considers that Greece should reinforce its Plan in the area of AMR, in particular by better justifying how the proposed interventions will help tackling the main drivers behind the current level of antimicrobial consumption. Therefore, the Commission invites Greece to consider reinforcing its Plan in the area of antimicrobials.
93. The Commission notes that the Greek Plan describes interventions and measures that should improve farm biosecurity, disease prevention and control and encourage Greece to implement those intervention and measures.
94. The Commission welcomes the intervention to, among others, address the welfare of laying hens. However, the Commission considers that Greece should integrate further interventions in its Plan to improve the animal welfare of pigs (to address tail docking practices which are forbidden by EU rules⁸, apart from in exceptional circumstances)

⁸ Council Directive 2008/120/EC of 18 December 2008 laying down minimum standards for the protection of pigs.

and to encourage the keeping of animals in non-confined housing system for laying hens, calves and sows.

1.4. Modernising the sector by fostering and sharing of knowledge, innovation and digitalisation in agriculture and rural areas and encouraging their uptake by farmers, through improved access to research, innovation knowledge exchange and training

1.4.1. Strategic assessment of the Cross-cutting Objective

95. Rural areas: Greece needs to elaborate the section of the digitalisation strategy so as to cover also digitalisation in rural areas and reflect on connectivity. While cross-referencing to SO8 would be possible, even there, the way digitalisation in rural areas is boosted is outlined to a limited extent. Furthermore, Greece should clarify the expected concrete role of the agricultural European Innovation Partnership (EIP-AGRI) in boosting digitalisation.
96. Digital divides: Greece should clarify it will address the digital divide between farms on the island and farms on the mainland, between technically advanced and less advanced farms and between different population groups and types of businesses.
97. Complementarity with other programmes: listing relevant other initiatives, which may contribute to the digital transformation in agriculture and rural areas & forest areas, would be welcomed, including under the RRF, Digital Innovation Hubs or Advanced Digital Skills funded under the Digital Europe Programme or synergies with the Horizon Europe actions, with specific attention to EIP Operational Groups and Horizon Thematic Networks and Multi-actor projects.
98. Digital skills: Support to the development of digital skills for farmers and advisors is foreseen under the Plan: the design of related measures could be more ambitious (e.g. a training in digital skills might be a prerequisite to apply for certain support schemes). However, it is not obvious how stakeholder groups in rural areas (which do not only include farmers) will benefit from support to gain digital skills. If such support is planned to be achieved through other instruments than the Plan, this is to be described. Generally, synergies with other instruments, such as support to advanced digital skills under the Digital Europe Programme might be considered.
99. Target for R.3 under the cross-cutting objective appears to be with 0.31% very low, considering the needs assessed. Greece should re-assess the level of this target.
100. We invite the Greek authorities to provide further details on: (a) the intervention strategy “P3-77-4.1 — Support for local development through LEADER” (milestones, targets, objectives, planned investments) of the identified need IF 052.08.05; (b) how the different mentioned funds (ERDF, ESF+, EAFRD) will ensure reaching the EU connectivity objectives in 2025 and in 2030 in rural areas; (c) the quality of rural 4G mobile coverage, and explain how they will reach the target of 5G coverage in all populated areas in 2030, in particular in rural populated areas.
101. Forests are a good ally in the fight against desertification and thus should be nurtured. Greece should consider making reference to the forest sector in terms of sharing knowledge, innovation and digitalisation in forestry and rural areas. Forests must

continue to deliver their socio-economic and environmental functions and to ensure vibrant rural areas with thriving population.

102. Section 8 sums up plenty of ideas and good initiatives to improve the Greek Agricultural Knowledge and Innovation Systems (hereafter, AKIS). We encourage the Greek Authorities to make them a reality. The Greek authorities are requested to explain the absence of interventions addressing AKIS. Furthermore, Greece is encouraged to reflect on the simplification of AKIS and explore cooperation opportunities with other ministries and policies.
103. The text mentions innovation support (an obligatory field in Article 15(4)(e) of the SPR to capture grassroots innovative ideas for Operational Groups (OGs) but does not refer to an intervention to do so. Greece is requested to clarify.
104. We advise the Greek Authorities to reflect about simplification and to concentrate the up-to-date knowledge and innovation for practice in one knowledge hub/back-office, which can serve both training and support.
105. Greece should clarify who will fund the set up and maintenance of the knowledge repository (part 8.2): the CAP network or another source. There is a potential to use funding from Article 78 of the SPR for such purposes under “setting up of advisory services”. It would be positive if indeed investments from the Ministry of Digital Politics could support the knowledge reservoir for practice. When investing in “producing data”, the focus should be on collecting easy understandable practical information useful for farmers, forest managers/owners and advisors, not with the single aim to support research. EIP OGs, with their co-creation thanks to the interactive innovation model (Article 127(3)), are the ideal means for researchers to have a positive collaboration on farmers’ needs and get real impact of the budget spent.
106. We encourage Greece to sign AKIS Cooperation protocols with other Ministries as soon as possible to jointly design and prepare projects or coordinate for specific actions, not just leaving this as a possibility to be pursued. It will help fighting AKIS fragmentation.

1.5. Simplification for final beneficiaries

107. Greece is invited to provide information: on the applicable communication channels with applicants, if and how technologies will be used for non-IACs controls and clarify if Area Monitoring (AMS) is used for force majeure cases as referred to in Article 3 of the SPR.
108. While, the Plan describes a digitalisation strategy, the Farm Advisory System, however, which is also supposed to cover digitalisation, is not explicitly mentioned. Greece is invited to supply information how applicants are informed about the Farm Advisory System and how they are encouraged to participate.
109. The bio-economy ensures that biological resources are used for the benefit of society along all pillars of sustainability. Greece has no Bio-economy Strategy. It is therefore invited to consider developing such a Strategy in association with the Plan to

reinforce the synergies between both policies, and to scale up the deployment of the circular and sustainable bio-economy.

1.6. Target plan

110. Regarding the target plan and indicators, Greece should consider the following points relating to the intervention logic:
111. The result indicator "R39 developing the rural economy: number of rural businesses, including bio-economy businesses, developed with CAP support" should be included and quantified as promoting the bio-economy has been given a high priority.
112. The targets of the results indicators R.21, R.22 and R.23 are not commensurate to the scale of the needs identified for the SO5. Greece is requested to assess the actual contribution of the different interventions and evaluate the inclusion of additional requirements to increase their contribution to these needs.
113. R.2 (Integrating advisors in AKIS) is missing. This is a serious issue if no intervention is designed for advisors.
114. R20 (Ammonia): Greece has not provided this indicator and should do so.
115. R24 (Pesticides) [6.8 to 10.9%]: Greece should fix a higher target, as the proposed one falls short of addressing the needs identified for SO 5 and 6. The new target should also allow Greece to achieve the 2030 targets of the Green Deal.
116. R26 (Investment support related to care for natural resources) [0% to 0.15 %]: the value proposed for this target is not numerically significant. Greece should propose a substantially higher target value.
117. R29 (Organic farming) [5.8% to 10.2%]: The Commission notes that the current share of UAA under Organic farming is 9.8 %. Greece should therefore propose a higher target for R29 to realise the full contribution of organic farming to addressing the pressing needs identified under SO 5 and 6 and to contribute achieving the EU target of the Green Deal in 2030.
118. R33 (Share of total Natura 2000 area under supported commitments): Greece has not provided this indicator and should do so.
119. R19 (Soil): The proposed increase [8.4 % to 13.5%] is not commensurate to the threats identified in the SWOT analysis (which should be also further completed, beyond erosion). Greece should propose a higher value; when doing so, it is invited to take account of the Soil Strategy recently presented by the Commission.
120. Greece should also note the following and amend subsequently the table:
 - The target plan is in financial year, therefore the Direct Payments Result Indicators (hereafter RI) R4, R6, R7, R8 are expected to start from financial year 2024 (corresponding to calendar year 2023 for Direct Payments) up to 2028 (corresponding to financial year 2028).

- The calculation of R6 and R7 should be reviewed in line with the methodology defined in the Implementing Regulation (EU) 2021/2290 and in the indicator fiches.
121. Cumulative values: The milestones of cumulative result indicators are presented as annual values rather than cumulated. The target is the sum of milestones, rather than being equal to 2029 value. It relates to R.1, R.3, R.9, R.15, R.16, R.26, R.27, R.28, R.37 and R.41.
 122. For R.36, there is no correspondence between milestones and the target.
 123. For R.10 and R.38, although the first payment occurs only once in the programming period, values are to be repeated each year.
 124. R.3 (Digitalisation) is only linked to O.21 (On-farm non-productive investments), while investing in digital devices is a productive investment (e.g. MK3-73-2.2).
 125. R.4 (Linking income support to standards and good practices): the sum of linked O.4 output values (3.876.376 ha) is strangely slightly higher than the value of R.4 numerator (3.876.360 ha). Greece is invited to check.
 126. R.12 (Climate adaptation) and R.14 (Carbon sequestration): these area-based indicators cannot be linked to an intervention paid per LU.
 127. R.19 (Soil): the value seems strange (very close to the sum of linked planned outputs), while one of the intervention has LU as unit of measurement. Moreover, this area-based indicator cannot be linked to an intervention paid per LU.
 128. R.22 (Nutrient management) and R.24 (Pesticides): the value of the numerator cannot be higher than the sum of the planned outputs.
 129. R.28 (Environmental or climate-related performance through knowledge and innovation): this cannot be linked to Eco-schemes (O.8), only to training or innovation interventions (O.1 and O.33).
 130. R.29 (Organic farming): the target value seems too high in view of the linked outputs. It might be linked to missing links between eco-schemes for organic and R.29.
 131. R.35 (Preserving beehives): the value is above 100%, it seems that the numerator is much higher than the contributing planned outputs.
 132. R.37 (Jobs created) should be larger than R.36, as R.36 is part of R.37, Greece should update the target value and take into account all young farmers setting-up with CAP support.

2. OPERATIONAL ASSESSMENT

2.1. Minimum ring-fencing

133. The amounts planned annually for eco-schemes in section 5 are below the minimum 25% of the adjusted allocation for Direct Payments (as required by Annex IX to the SPR). Greece need to revise this point and ensure compliance to the SPR).

134. Regarding the wine sector, Greece is invited to provide an explanation on how it plans to achieve the compulsory environmental contribution (5% of expenditure earmarked for environmental objectives, Article 60(4) of the SPR).
135. The amount planned for the CRISS in section 5 for calendar year 2027 is below the minimum 10% of the adjusted allocation for Direct Payments (Annex IX to the SPR).

2.2. Common elements to several interventions (section 4 of the Plan)

2.2.1. Definitions and minimum requirements

136. Greece should clarify, complete and where relevant correct the definitions, which, in certain cases, do not seem to comply with regulatory requirements (in particular on active farmer).
137. Regarding the definition of agricultural activity, Greece is invited to clarify or complete the relevant sections of the Plan according to the following:
 138. 4.1.1.1 Definition of production. The reference to production for arable land under 4.1.1.2.1 (harvest or crop residues) and for permanent grassland (pasture in production (minimum stocking density) under 4.1.1.2.3 should be included here.
 139. Greece should remove the sentence referring to maintenance, which should be under 4.1.1.2.1.
 140. 4.1.1.2.1 Maintenance of arable land. Ploughing land lying fallow seems in contrast with GAEC 5 objectives, it should be justified.
 141. Regarding the definition of agricultural area, Greece should complete the information with the following:
 142. 4.1.2.1.1(2)(3) Agroforestry. Information on the elements of agroforestry based e.g. on type of trees, their size, number, distribution and management practices (whether or not differentiated per type of agricultural area) should be provided.
 143. 4.1.2.3.2 Short Rotation Coppice. The actual harvest cycle and the planting density, as well as the list of eligible species should be indicated for legal security of the farmers.
 144. 4.1.2.4.4 Reseeding with different types of grasses. The description should include the criteria to consider a grass of “a different type” e.g. at the level of family/genus/species.
 145. 4.1.2.4.7 Other comments relating to the definition of permanent grassland. Information under 4.1.2.1.3 should be included here.
146. Concerning the definition of eligible hectare, the following elements should be adapted:
 147. 4.1.3.1 Predominance of agricultural activity. The information presented is not relevant for this section and is rather pertinent for other elements of eligible hectare. Greece should explain how it is intended to assess whether the agricultural activity

remains predominant in case also non-agricultural activity is performed on the agricultural area.

148. 4.1.3.2 Land at disposal. It should be clarified whether the national law provides for other types of contracts that regulate the question of land holding and whether these other contracts would be accepted (e.g. land concession, oral lease or other form of oral agreement, or other national legal forms, legal tradition and /or legal custom). The section should also provide information on the implementation, i.e. how it will be verified that the land is actually and lawfully used by the farmer.
149. Regarding the definition of ‘active farmer’, the following should be completed:
 150. 4.1.4.1 Active farmer. It should be clarified whether the inclusion in the register is related to the engagement in at least a minimum level of agricultural activity and whether it implies an obligation to produce. Greece should confirm that the criteria do not penalise the farmers who do not produce.
 151. 4.1.4.3 Exemption threshold. Greece should provide a justification for the threshold by including qualitative and quantitative information, e.g. the number of excluded farms.
152. Regarding the definition of ‘young farmer’, the following sub-sections should be completed:
 153. 4.1.5.2 and 4.1.6.1 – Greece should describe the conditions for being head of holding in case of a legal entity and group of farmers;
 154. 4.1.5.4. – It should be clarified if the other elements relating to Young Farmer definition belong to the requirement of having appropriate skills; in such case they should be integrated under section 4.1.5.3.
155. Concerning minimum requirements, (section 4.1.7.1.), on the basis of quantitative and qualitative information, Greece should provide a justification as to how the thresholds set ensure the reduction of administrative burden and contribute to the objective of supporting ‘viable farm income’.
156. The Greek authorities should include an explanation of the demarcation between Direct Payments, rural development and sectoral interventions and the support provided by the programme for the smaller Aegean islands.

2.2.2. Elements related to Direct Payments

157. Greece should provide in section 4.2, not in the BISS intervention, the elements relating to the territorialisation of the Basic Income Support for Sustainability (hereafter BISS) and the management of the payment entitlements (internal convergence, the reserve and transfers). Repetitions should be avoided. In addition, several elements require further justification and/or clarification.
158. As regards the reserve, Greece is requested to clarify the following:
 159. whether all entitlements with a value below EUR 250 will automatically expire at the start of calendar year 2023;

160. whether it foresees to serve other categories of farmers than the obligatory categories of young and new farmers (and following court rulings or final administrative act of the competent authority);
161. under which conditions payment entitlements that have not been activated will return to the reserve (e.g. “especially for 2022-2023, if the entitlements are not activated, they shall be returned to the reserve”).
162. why reference is made to a windfall profit clause as this seems irrelevant since there is no new “first allocation” of entitlements in the context of BISS.
163. Regarding transfers of payment entitlements, Greece is invited to clarify the following:
164. 25% reduction on the transfer of payment entitlements without land:
165. Greece is invited to explain the objective of this rule and to indicate how the conditions set will help to reach this objective. It must be kept in mind that all conditions set must be objective and non-discriminatory.
166. Greece should clarify whether it intends to apply this reduction on the value or on the number of the payment entitlements. A change in the value of payment entitlements, other than what is explicitly foreseen in the regulation, goes against the objective of internal convergence. Therefore, Greece should apply the reduction on the number of payment entitlements.
167. Greece is requested to clarify the rule that entitlements can only be transferred to active farmers holding land.

2.2.3. CAP network

168. Greece is requested to review the description of the activities of the national CAP network and ensure correct referencing to AKIS and other networks. Additional clarifications are necessary concerning the CAP network’s funding activities.

2.2.4. Overview of the coordination, demarcation and complementarities between the EAFRD and other Union funds active in rural areas

169. Since the Plan 2021-2027 does not support broadband actions, Greece should explain how the 2025 target of 100% broadband access will be fulfilled – if relevant, mention participation of other EU funds. Greece should explain how any potentially identified gaps related to broadband will be covered by other EU Funds.
170. Greece is requested to consider referencing the Long-term Vision for the EU’s rural areas (COM(2021) 345 final) in Section 4.5, adding relevant detail in the description of interventions.
171. Given the importance of Horizon Europe in tackling soil health, climate change, biodiversity, food systems and competitiveness, Greece is invited to consider actions creating synergies between the Plan and Horizon Europe actions with specific attention to EIP Operational Groups and Horizon Thematic Networks and Multi-actor projects and Horizon Europe Partnerships. Greece is also invited to describe how the CAP will support implementation of Horizon Europe Missions, the Missions “A soil deal for Europe”, “Adaptation to Climate Change” and “Restore our Ocean and

Waters by 2030". Greece should also consider the possibility to coordinate the Plan with the Programme for the Environment and Climate Action (LIFE).

2.2.5. Common elements for Rural Development types of interventions

172. In section 4.7.3, for activities falling outside the scope of Article 42 of the TFEU, there must be an exclusion of companies in difficulty or companies still having a pending recovery order following a Commission decision declaring an aid illegal and incompatible with the internal market, except in the cases mentioned in the applicable State aid rules.
173. Greece is requested to consider introducing in section 4.7.3 a general eligibility requirement for an assessment of the expected environmental impact in accordance with the applicable legislation for the type of investment concerned, where an investment is likely to have negative effects on the environment.

2.3. Interventions and baseline

174. Greece is invited to clarify choices as regards the World Trade Organisation (WTO) requirements. The Commission would like to recall that for interventions listed in Annex II to the SPR, the intervention description needs to include the appropriate WTO correspondence along with an explanation on how WTO compliance is assured.

2.3.1. Conditionality

175. The implementation of several standards depends on the update of the LPIS. Greece is requested to clarify the planning of this update in order to be able to implement the proposed measures as of 2023 concerning GAEC 1, 2, 4, 5, 6, 7, 8 and 9 (2025 for parts of GAEC 2). In particular, Greece is requested to clearly define the territorial scope for the said GAEC standards.

GAEC 2

176. Greece is invited to clarify the measures applicable in order to ensure protection of all relevant wetland and peatland located in Natura 2000 areas as well as those located outside Natura 2000.
177. Greece is invited to provide information on the planning for the area designation and identification in order to ensure the application of GAEC 2 in 2025.
178. The Commission considers that protection inside Natura 2000 (agricultural and forest areas) should be applicable from 2023.

GAEC 5

179. The GAEC rules focus on slope areas (6, 12 and 15%). Given that the protection of soils is a key objective in Greece, and as 52% of the soils encounter serious erosion threat according to the SWOT analysis, some requirement can be reinforced or better specified: for example the period of ban of ploughing should be extended from 01/11 to 15/03.
180. Greece is invited to envisage measures during periods of heavy rainfall as 20% of surface of the country is in zones with high flooding risk according to the SWOT.

The standard should be defined in a precise and not ambiguous manner, so farmers can understand what is requested.

GAEC 6

181. All arable land and permanent crops should be considered and minimum soil cover requirements need to be addressed at least for all arable land whatever the slope gradient.
182. The standard is applicable as of slope gradient 12%. Greece needs to protect all land types including arable land and permanent crops without considering only the slope gradient. Greece is therefore requested to adapt this GAEC accordingly, in order to plan a more comprehensive scope in particular to require a coverage for all arable land and avoid regression compared with current rules (10%).

GAEC 7

183. GAEC 7 provides that Member States should define requirements for crop rotation.
184. As regards crop rotation, the Commission considers that keeping the main crop for three years is not in line with the purpose of this GAEC. Also, exceptions to conditionality must be interpreted narrowly.
185. Footnote 4 cannot be understood as providing for crop diversification as an alternative to crop rotation for the whole Member State territory. In the case where Greece would make use of the option to define, by exemption, requirements for crop diversification in specific regions shall be defined on the basis of diversity of farming methods and agro-climatic regions, the Greek authorities are requested to provide an explanation of the contribution of the practices to the GAEC's goal of preserving the soil potential and a justification of the choice made.
186. Greece should therefore modify the national standard of GAEC 7 against the respective EU definition in particular on crop diversification that is to be used as an exception and only in limited specific regions.

GAEC 8

187. This GAEC aims at protecting and creating non-productive elements key for biodiversity. Greece is therefore invited to extend its protection to all the elements included in the list of features. Greece is also invited to provide an indication of the characteristics of the landscape features selected, including the minimum/maximum size, where relevant, and the conversion and weighting factors. In particular, weighting factors should capture the contribution of eligible elements to GAEC' objective.
188. Due to the exemption applied, in particular the minimum size of arable land of 10 ha, this standard would not be applicable to a significant share of areas as farms with less than 10 ha represent approximately 40 % of agricultural areas. We invite Greece to reconsider the scope of the GAEC and to exempt only farms below 5 ha from the GAEC 8 requirement. This would exempt the smallest farms and provide an acceptable contribution to environmental objectives.

189. The ban on cutting hedges and trees during the nesting period is brought back from four to two months compared with the existing GAEC. Greece is requested to reverse this decision in order to avoid regression, which is the goal of the GAEC.

GAEC 9

190. Considering the importance of this GAEC (currently under greening) to protect the pastures of high natural value, Greece is invited to consider a large definition of these areas taking into account the current grassland status and trends in the recent Article 17 report from the Nature Directives on the conservation of grasslands protected habitats, and the objective to achieve a good conservation status of these valuable grassland.

2.3.2. For direct income support

2.3.2.1. Basic Income Support for Sustainability (BISS) (Article 21-28 of the SPR, section 5 of the Plan)

191. As regards the territorialisation of the BISS, Greece is requested to confirm that the criteria are based on historic land use like it was the case for the period 2014-2022 and to clarify the difference in income support needs between these groups of territories.

192. The unit amounts should be justified primarily based on the analysis and needs assessment in terms of income support. The difference in unit amounts between the different groups of territories should be justified based on data indicating different income support needs.

193. Similarly the minimum and maximum unit amounts should be justified on the same basis, complemented if relevant by elements of uncertainty leading to the risk of unspent funds. The variation set is considered very high and not adequately justified.

194. As regards the reserve, Greece is requested to clarify the modalities of replenishment and reversion to the reserve and the categories of farmers to be served from it.

195. Regarding transfers of payment entitlements, Greece is invited to explain the 25% reduction on the transfer of payment entitlements without land (objective, conditions, and modalities of implementation). The rule that entitlements can only be transferred to active farmers holding land should also be clarified.

196. The Commission invites Greece:

- to avoid repeating under this section elements regarding the definitions, the minimum requirements as these are described in section 4.1 of the Plan;
- to provide all information on the management of payment entitlements under heading 4.2 of the Plan (internal convergence, territorialisation, reserve and transfers).

2.3.2.2. *Complementary Redistributive Income Support for Sustainability (CRISS) (Article 29 of the SPR, section 5 of the Plan)*

197. The amount planned for CRISS in section 5 for calendar year 2027 is below the minimum 10% of the adjusted allocation for Direct Payments (Annex IX to the SPR).
198. The minimum and maximum unit amounts should be reconsidered. The variation set is considered very high and not adequately justified. They should be justified based on analysis and the needs assessment, complemented if relevant by elements of uncertainty leading to the risk of unspent funds.
199. The thresholds of farm size defined by groups of territories and in particular the minimum threshold for arable land should be further justified.
200. Greece should clarify if farms above a certain farm size will be excluded from CRISS or not (and if yes, justify).
201. As regards the application of the CRISS at the level of members of legal persons or groups/ at the level of group of affiliated legal entities, Greece should fill in the relevant section under 4.2.3 of the Plan. Greece should clarify whether it intends to apply both options of Article 29(6) of the SPR (first and second sub-paragraphs). If yes Greece should justify why and how these two options are complementary.
202. Greece is invited to clarify how the support will be provided to farms with areas in several groups of territories.
203. The Commission invites Greece to avoid repeating the text under section 3.49 of the Plan in the description of the CRISS intervention and to focus on the complementary information relevant for this description.

2.3.2.3. *Complementary Income Support for Young Farmers (CISYF) (Article 30 of the SPR, section 5 of the Plan)*

204. Greece is invited to:
 205. Review the Specific Objective linked to the CISYF and adjust the needs to what is relevant for Specific Objective 7;
 206. Link the intervention to result indicator R37 as it contributes to safeguard and create jobs;
 207. Clarify the condition of newly set-up in regards to the first application to BISS;
 208. Explain the choice of 25 hectares as a threshold, as well as the variations of minimum and maximum unit amounts;
 209. Integrate the elements of definition of head of the holding of a legal entity and the required skills into the definition of young farmers and remove them from the intervention specific conditions; it is reminded that the definition is common for all interventions.

⁹ Section 3.4 of the Plan: Overview as regards the aim of fairer distribution and more effective and efficient targeting of income support.

2.3.2.4. *Eco-schemes (ES) (Article 31 of the SPR, section 5 of the Plan)*

210. A brief description of the method for calculating the amount of support and its certification according to Article 82 of the SPR are to be provided in section 7 of each intervention concerned. A breakdown of uniform amount should be made in Eco-schemes (i.e. 31.5 and 31.6).
211. The full certified method of calculation (when carried out by an independent body) and in case it has been carried out by the managing authority, the certification by an independent body is to be provided in an annex to the Plan.
212. Specific explanation needs to be provided in relation to the context and the need of the planned unit amount (total hectares) of all interventions. The level of ambition of the Plan in this area is not clear.
213. The choice of some result indicators (ES 31.1, 31.4, 31.5, 31.6, 31.7) needs to be carefully re-assessed for all eco-scheme interventions (some are not direct or relevant and some may be more appropriate and should be linked).
214. Given the severe problems of desertification and land degradation, the Commission also regrets that there is no intervention, either under eco-schemes or rural development, specifically targeted on soil and encourages Greece to consider such an introduction.
215. Also, the Plan should highlight that farmers should have access to several eco-schemes.
216. The Commission welcomes the inclusion of an eco-scheme to support the shift to less water-intensive crops.

Specifically for:

217. **ES 31.2: extension of the application of ecological focus areas.** In the description of the commitments, the width of the buffer strip (3 metres) is the same as in GAEC 4; it therefore does not go beyond the standard. Also, while welcoming the provision of substantial financial support for this eco-scheme, the text should clarify that compensation is offered only for extensions or effort beyond the baseline. There is a need to clarify the articulation with GAEC 8 (selection of relevant options 1 and/or 3).
218. **ES 31.3 Application of ecological focus areas for trees:** In line with its objective, the eco-scheme should explicitly state its non-productive character.
219. **ES 31.5. Precision farming and ES 31.6 Permanent grassland management** are insufficient to support ammonia and methane emissions reduction, and Greece should consider adding support for ammonia reduction measures in the list of practices supported (e.g. for animal housing and feeding, and, beyond the requirements of the Nitrates Action Programme, for manure storage and management, fertiliser use and application of fertilisers/manure to fields), either in this or other interventions. As regards nutrients, the ES 31.5 does not contain any commitment to reduce nutrient

pollution; it should also clarify that support for the two included practices will be possible only when they go beyond the baseline.

220. **ES 31.8. Conservation of organic farming and livestock farming.** The Commission notes that the number of hectares supported remains the same all through the years, while in principle some sort of increase should be expected as a result of an increase in the % of UAA under Organic Farming. Greek authorities are requested to revise their calculations and provide any necessary budgetary reinforcement.

2.3.2.5. *Coupled Income Support (CIS) (Article 32-35 of the SPR, section 5 of the Plan)*

221. In addition to the relevant observations reported in ‘Key Issues’ and the strategic assessment of SO1 of this Annex, Greece should reconsider the targeting of the sectors and/or strengthen the justifications of the difficulty and the importance and systematically underpin the supporting arguments by statistical evidence. While Greece underpins the necessity to grant coupled payments to certain sectors (e.g. citrus, nuts, beef and veal, silkworms) by the need to increase the degree of self-sufficiency and/or mitigate imports, it must be objected that these arguments are not in line with the regulatory framework, given that coupled payments are designed to address the difficulty of the eligible sector/production by improving its competitiveness, quality or sustainability.
222. Greece should also provide information on how the interventions are to improve the situation of the sector to overcome such difficulties. In line with Article 32(2) of the SPR, the CIS interventions should help the sector addressing its difficulty by improving its competitiveness, sustainability or quality. In addition, for CIS interventions proposed to efficiently address difficulties and improve the competitiveness and sustainability of the sector, in order not to lead to a deterioration of the environmental climate situation (e.g. resulting from intensification of livestock farming, or increased water-use in water scarce regions), the Greek authorities are requested to clarify the interplay between CIS and other support decisions under the Plan and to improve, if relevant, the CIS interventions’ targeting (e.g. eligibility conditions to specific types of farming within a sector and better tailor-made CIS according to different local context).
223. Greece should also ensure the coherence and synergies between CIS and other interventions across all the SOs. In particular, Greece is invited to clarify and reconsider its decision as regards the choice not to establish eligibility limits in terms of the maximum number of hectares/animals or maximum livestock density, in particular for interventions targeting intensive animal production or crops typically linked to an intensive use of water and/or plant protection products.
224. As for the consistency between the proposed CIS interventions and the Water Framework Directive¹⁰, Greece is invited to provide an explanation in the dedicated section of the Plan how river-basin management challenges have been taken into account in the design and implementation of the CIS interventions, in particular for interventions targeting sectors operating in regions where a good ecological status has

¹⁰ Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy.

not yet been achieved and for interventions that are more likely to have a significant impact on water quality and quantity.

225. The justification of unit amounts should be reinforced for certain products. It should be primarily based on the analysis and needs assessment, and could be underpinned by the estimation of the operational margin as presented for a number of products. Similarly the minimum and maximum unit amounts should be justified on the same basis, complemented if relevant by elements of uncertainty leading to the risk of unspent funds.

226. Greece is also invited to:

- ensure that all CIS interventions are correctly filled in under their respective sub-sections in the Plan;
- link them to the appropriate SOs 1 and 2, needs and result indicators R.4 (Linking income support to standards and good practices), R.6 (Redistribution to smaller farms), R.7 (Enhancing support to farms in areas with specific needs) and R8 (Farms in specific sectors).

227. The Commission should inform Member States about reduction coefficients, if any, related to the EU WTO schedule on oilseed (Blair House) in the observation letter. The Commission has not received all the information needed yet. Once all Member States have submitted their Plans, the Commission will inform Member States, if such coefficient is needed.

2.3.3. For sectoral interventions

228. Greece is invited to clarify the applicability of increased conditionality as a baseline for the implementation of sectoral type of interventions, for example for fruit and vegetable and olive oil and table olives interventions to producer organisations and its members. The Commission has strong concerns about the linkage between GAEC and sectoral interventions and the possible double funding.

2.3.3.1. Fruit and vegetables

229. The Commission has noted that the content of the future operational programmes is limited only to a few types of interventions in Article 47(1)(a) of the SPR and recommends not to limit or concentrate only on this context. The Commission considers that the proposed approach does not comply with all requirements and obligations and, in particular, with the requirements of Article 50(7) of the SPR as this limited approach (no support for organic production, no actions improving resilience against pests, reducing impact of pesticide use or prevention of climatic events etc.) would put in question the achievement of the ring-fencing obligations.

230. Greece is invited to add result indicators R.1 (advice and training) and potentially R.28 (environmental or climate related performance through investments), R.10 (Supply chain) and R.5 (risk management). It needs to be emphasised that the reference to R.10 and R.11 is mandatory based on Article 160 (concentration of supply) of Regulation (EU) No 1308/2013 and Article 11 (main activity-concentration of supply) of Regulation (EU) 2017/891. In addition, Investments - 47.1-1a should be linked at minimum with R.9 (modernisation) too.

231. Greece is invited to verify and properly describe in the Plan how all additional requirements set out in Delegated Regulation (EU) 2022/126 for instance, the percentage for minimum water savings (Article 11(4)(a) of Delegated Regulation (EU) 2022/126), are to be addressed.
232. Greece is invited to review the indicative category of eligibility costs because they may be problematic and not in line with point 13 of Annex II of Delegated Regulation (EU) 2022/126 (re: study visits). Also, Greece should review and harmonise the level of details of in the content of sectoral interventions and exclude the information that could form part of national legislation. This way, the flexibility of the new delivery mechanism is ensured and possible delays in implementation (when changes are required) may be avoided.

2.3.3.2. *Apiculture*

233. Greece is invited to:

234. improve the description in section 3.5.2 with a more detailed analysis of the sector, leading to the identified needs and justification of the interventions chosen and include a description of a reliable method for determining the no. of beehives as per Article 37 of Regulation (EU) 2022/126;
235. improve the description in sections 5 & 6 of all interventions, outlining how the interventions contribute to the relevant specific & sectoral objectives while providing a more comprehensive explanation of the intervention and each of the supported actions including eligible expenditure with clear examples of these;
236. ensure that support is provided for eligible expenditure in compliance with the provisions of the relevant regulations in particular Regulation (EU) 2022/126;
237. determine as far as possible, planned unit amounts and outputs for the different interventions/actions considered within a type of intervention and explain and justify how these were calculated in consistency with section 6;
238. ensure that the indicative financial allocation for 2023 takes into account any planned expenditure for the implementation of measures under the National Apiculture Programme 2020-2022 from 1/08 – 31/12/2022;
239. revise the information in Tables 5.2.10 and 6.2.2, to include the Total Public expenditure in the updated tables.

2.3.3.3. *Wine*

240. The Commission invites Greece to take into the account the ambitions of the Green Deal and objectives of the Farm to Fork strategy and biodiversity and to apply the specific national values for these objectives also in the wine sector.
241. Although Greece describes well the measures, it did not sufficiently consider the specific provisions laid down in in Delegated Regulation (EU) 2022/126. In fact, as Greece plans to implement the promotion type of intervention, the Commission

draws attention to the specific eligibility conditions laid down in Article 40(3), letter b), of Delegated Regulation (EU) 2022/126 and invites Greece to ensure compliance with this provision.

242. Greece should link P-58.2 — Investment in tangible and intangible assets in wine-growing holdings, to R.39 (Developing the rural economy).
243. Greece is encouraged to include also organic products in the objectives of intervention P2-58.4: Specific measure to support information and encouragement for responsible consumption of wine or the promotion of quality schemes covering designations of origin and geographical indications.

2.3.3.4. *Olive oil and table olives*

244. The Commission invites Greece to add result indicators R10 for all interventions, and R.1 for interventions 47.2.1b (advise) and 47.2.1c (training). In addition, the support to investments (47.2.1a) should be linked at minimum with R.9 (modernisation) and R.16 (investments for climate) too.
245. Greece is invited to improve the overall presentation of the interventions, including the references to EU legislation, cross-references used and consistency (e.g. between the content of sections 2 and 5, or in section 5 for intervention Trans 47 (1) (e)). Greece is also invited to further develop how the described types of intervention are linked to and are relevant to the objectives claimed in order to justify the percentages of the Union financial assistance to the eligible costs pursuant to Article 65(1) of the SPR and to verify that the content of section 6 is fully aligned with the provisions of this article.
246. Greece is also invited to verify and demonstrate that all EU additional requirements set out in Delegated Regulation (EU) 2022/126 are properly described in its Plan.
247. Greece is invited to review the indicative category of eligibility costs because they may be problematic and not in line with points 11 (re: training programmes with joint participants) and 13 (re: study visits abroad) of Annex II of Delegated Regulation (EU) 2022/126. Also, Greece should review and harmonise the level of detail in the content of sectoral interventions.
248. Regarding the requirement for a minimum and maximum amounts of Union financing per programme, the Commission invites Greece to further elaborate on the justification for this requirement, and its ceilings, in light of the objectives pursued. The Commission also invites Greece to clarify whether the minimum turnover requirements for the producer organizations and its associations, are part of the national conditions for recognition of producer organisations and of its associations.
249. Greece is invited to indicate in its Plan how the value of marketed production is calculated for this sector, as per Article 31(2) of Delegated Regulation (EU) 2022/126.
250. Any planned expenditure for the implementation of measures for the olive oil sector under Regulation (EU) No 1308/2013 which is paid from 2023 shall be deducted

from the financial allocations for certain types of interventions in Article 88(4) of the SPR in 2023 or in the following financial years.

2.3.4. For rural development

2.3.4.1. Management commitments (Article 70 of the SPR, section 5 of the Plan)

Animal welfare

251. **P3-70-3.1 Welfare of productive animals:** Greece needs to provide clarifications and additional information on the content of this intervention (i.e. duration of commitment, information on beneficiaries' obligations, correctness of the calculation of the support rate/amount) as well as the unit amounts and result indicators selected.

Agro-environmental-climate interventions

252. **General comment:** Greece should ensure that all mandatory sections are completed (i.e. obligations/possibilities of beneficiaries) and also provide more information on the specific management commitments, how these clearly go beyond baseline, the basis of calculations for the support rate/amount and the verification of their correctness.
253. **P3-70-1.1 Protection of wildlife within protected areas:** The Commission would welcome that, despite the management plans not being in place throughout the territory, Greece takes action to protect birds and explore the possibility (as prioritised by the PAF or in line with European or national species action plans) to focus the action to address the specific conservation needs of clearly identified (groups of) protected bird species or preventive measures/ compensation for limiting the attacks and damage caused by large carnivores (i.e. electric fencing). However, Greece needs to provide clarification on the description of the action, revise the applicability of the result indicators and re-check the correctness of the applicable contribution rates. Greece could also consider including forest areas in this intervention to strengthen the protection of forest wildlife and habitats.
254. **P3-70-1.2 Aid for the protection of the rural landscape:** Greece needs to provide clarifications regarding the distinction between the commitments and the eligibility requirements and consider providing a link between the relevant baselines and national standards.
255. **P3-70-1.3 Application of alternative plant protection methods to reduce pesticides:** Greece needs to review the following: the description of the action is incomplete, the link to the result indicator is unclear and the needs do not seem to cover all the SOs. Also, the different uniform UAs that respond to the potential different commitments that can be selected by the beneficiary should be listed.

Organic Farming

256. **P3-70-2.1 Aid for the conversion to organic practices and methods:** Greece needs to provide more information on the calculation of the support rate/amount, and explain the obligations/possibilities for beneficiaries. Some clarifications are also

necessary on the definitions used and links to additional result indicators as mentioned below.

257. Based on the recognised contribution of organic farming, Greece should link this intervention also to R.14 (carbon sequestration), R.19 (soil), R.21 (water quality), R.22 (nutrient management), R.24 (pesticides,) and R.31 (habitat and species). In the case of support for organic livestock farming, also indicators R.43 and R.44 are relevant.
258. In the light of the environmental benefits of organic farming and its contribution to the objectives of several pieces of environmental legislation mentioned in Annex XIII, the Commission would like to request Greece to increase its effort on Organic Farming.
259. The articulation with the eco-scheme P1-31.8: Maintenance of organic farming and livestock farming methods needs to be clarified as well as the duration of support for conversion, as it appears longer than the conversion periods established in the SPR.

Forestry commitments

260. **P3-70.4.1 Afforestation and creation of woodland:** Greece needs to provide clarifications on the duration of maintenance costs and the link to the result indicators. Also, Greece should clarify how the challenges related to forest management are addressed since there are no new actions planned. The level of ambition is difficult to judge, especially the link to carbon farming and water retention capacity.
261. Greece is invited to reinforce the financial allocation to forestry interventions as well as introduce both management commitment and investment measures, which could help to develop multifunctional and resilient forestry sector through sustainable forest management.

Genetic resources

262. **P3-70-1.4 Protection and conservation of genetic resources:** Greece needs to fill some parts of the description of this intervention and provide clarifications (obligations/ possibilities for beneficiaries, ensure referencing of the tables of eligibility, and the elaboration on the baseline conditions and basis and correctness of the calculations for the support rate/amount). Greece also needs to review the link to the result indicators and consider further linking of additional relevant indicators. Greece could also consider including forest genetic resources and conservation since these are very important for ecosystem restoration. The intervention should comply with the provisions of Article 45 of Commission Delegated Regulation (EU) 2022/126.

2.3.4.2. Areas with Natural Constraints (Article 71 of the SPR, section 5 of the Plan)

263. **P3-71 Payments in areas characterised by natural or other specific constraints:** Greece needs to provide clarifications in the description of the actions (the annual amount of support) and the basis of calculations (potential beneficiaries and support amount).

2.3.4.3. *NATURA 2000/WFD payments (Article 72 of the SPR, section 5 of the Plan)*

264. There is no intervention planned for Article 72 of the SPR. However, there are relevant interventions in the nature of the actions of P3-70-1.1 (protection of wildlife within protected areas and eco-schemes relating to the ecological focus areas). In the absence of management plans for areas of special protection and agricultural areas within the European network of NATURA 2000 areas, intervention P3-70-1.1 should contribute as much as possible to the EU biodiversity strategy and targets.
265. Nevertheless, the Greek authorities are invited to consider introducing an intervention under Article 72 of the SPR for payments for agricultural and forest areas Natura 2000 and Water Framework Directives payments given that agriculture remains the main pressure and there is a need to ensure non-deterioration of habitats and to prevent disturbance of species in the site.

2.3.4.4. *Investments, including investments in irrigation (Article 73-74 of the SPR, section 5 of the Plan)*

Productive Investments, including investments in irrigation

266. **P3-73-2.1 Projects for the improvement of agricultural holdings contributing to competitiveness:** Greece needs to clarify the type of potential beneficiaries and the eligible sectors (including explanation on synergies with sectoral markets of the Greek Plan). Also, Greece should explain why the planning of unit amounts is missing (planned output, unit amount and financial envelope). Greece is reminded that only products covered by Article 42 of the TFEU are concerned in this intervention.
267. **P3-73-2.2 Digital and green investments in agricultural holdings:** Greece needs to explain the relevance of selecting the output indicators and the result indicators. Also, Greece should provide the missing unit amounts and ensure/review compliance to relevant Regulations (e.g. renewables Directive 2018/2001). This intervention contains mainly productive elements and therefore, may not qualify for a non-productive investment intervention but for a green productive investment intervention (investments as referred to in Article 73(4)(a)(i) of the SPR. Moreover, due to the specific set of eligibility conditions, investments in irrigation should be singled out in a separate intervention. With respect to investments in irrigation there is a need to further clarify the eligibility conditions, in particular as regards water saving requirements, and to reflect all the relevant requirements of Article 74 of the SPR. As regards in particular the climate change investments (e.g. fires, floods), a close coordination is necessary in order to avoid overlapping with the similar ERDF actions foreseen under the 2021 – 2027 “Civil Protection” programme, as well as all thirteen (13) Regional Programmes.
268. **P3-73-2.3 Support for investments in processing/ marketing and/or development of agricultural products:** Greece needs to provide more information on the eligible sectors and explain the consistency and synergies with relevant sectoral complementarity measures in the Plan. Also, Greece should consider linking the result indicator R.39 (developing the rural economy).
269. **P3-73-2.4 Investments to prevent and protect livestock from communicable diseases and improve living conditions:** Greece is invited to explain how it ensures

there is no overlap with the action P3-70-3.1 on animal welfare. Greece should also consider result indicators linked to welfare and modernisation and ensure that all actions of this intervention are conditioned with due consideration to reducing ammonia and methane emissions. Moreover, this intervention does not qualify for a non-productive investment intervention but for a productive investment intervention linked to animal welfare and therefore benefitting from a higher support rate.

270. **P3-73-2.5: Investments in farms to protect against natural disasters:** The Commission notes that non-productive green investments should be linked to the delivery of purely environmental and climate benefits. This intervention does not seem to qualify in this category and neither for the environmental ring-fencing.

Green, NPI, irrigation

271. **P3-73-1.1: Land improvement infrastructure projects:** Greece needs to clarify the type of investments to be financed under this intervention – if investments are linked to competitiveness rather than environment/climate objectives, the investment cannot be counted towards the environmental ring-fencing. Also, Greece should clarify the selection criteria and – with respect to irrigation - streamline the eligibility conditions to reflect all relevant requirements of Article 74 of the SPR in line with the needs identified. Greece is invited to clearly distinguish between investments in the improvement of existing irrigation installations, and investments leading to a net increase of irrigated area since this has implications for the link to specific objectives and result indicators (SO5 and R26 or R27 for the former, and SO2 and R9 or R39 for the latter). Furthermore, Greece needs to correct the co-financing rate, and justify the maximum unit amount.
272. **P3-73-1.3 Prevention and restoration of damage to forests:** it seems the proposed budget is significantly less than 2014-2022 period thus Greece needs to explain how the increased essential prevention actions of the country will be covered, including consistency with environmental and climate objectives. The Commission notes that the intervention falls outside the scope of Article 42 of the TFEU and a State Aid clearance instrument must be indicated. Also, Greece should add a link to R.17 (restoration).
273. **P3-73-1.2 improvement of access to agricultural land and farms/livestock holdings:** Greece is requested to review the intervention logic because the link between the action proposed and the need does not seem appropriate. Also, Greece is requested to provide information on territorial targeting and clarify the principles of selection and eligible expenditure.

2.3.4.5. Installation aid (Article 75 of the SPR, section 5 of the Plan)

274. **P3-75.1 Setting up of Young Farmers:** Greece is invited to put more focus on gender gaps, clarify the condition of “ownership” for the beneficiary and link it also to R.37.

2.3.4.6. Cooperation (Article 77 of the SPR, section 5 of the Plan)

275. **P3-77-4.1 Support for local development through LEADER/CLLD:** Greece is invited to consider other non-LEADER interventions and additional funding to tackle the basic needs of rural areas identified (e.g. investments diversification or basic village infrastructure; not linked directly to agriculture). Greece is invited to target

LEADER interventions to areas with clear added value and explain how it will ensure all LAGs will fully apply the LEADER method and perform their core tasks as required in the SPR Regulation. On this basis Greece is requested to explain the added value of the LEADER intervention in terms of social capital building, local governance and better project results as compared with non-LEADER delivery. Furthermore, Greece should ensure complementarity, close and active coordination with other EU funds.

276. **P3-77-2.1 Quality schemes of agricultural products and food:** Greece is invited to align the list of eligible Geographical Indications (GIs) with the associated legislation mentioned in the eligibility criteria (i.e., the intervention description does not match the support amount table – the description mentions support to the wine sector whereas the support amount table also includes a reference to Regulation (EU) No 1151/2012 on food GIs) and to provide additional information regarding the contribution of the intervention to SO9. Also, Greece should ensure the consistency of eligible quality schemes in all parts of the intervention and explain the choice of using uniform amount (instead of average).
277. The Commission draws the attention of the Greek authorities to the fact that, according to Article 77(1) of the SPR, quality schemes should be open to all producers and it is not clear whether such conditions are met by the AGRO schemes. Greece is requested to clarify that the national quality schemes are in compliance with Regulation (EU) 2022/126 and also, clarify whether this intervention concerns only Annex I products (for State Aid purposes). In the former case, State aid rules will not apply. In the latter case, the box “Mixed” will have to be ticked in point 8.
278. **P3-77-3.1 Developing partnerships to link research to production through EIP Operational Groups for productivity and sustainability in EIP-Agriculture:** Greece needs to clarify the role of “Innovation Facilitator” and explain why expenditure is planned only in years 2025-2027. Greece is encouraged to avoid strictly determining in advance the subjects to be covered, as this could mean that certain grassroots innovative ideas coming in through innovation support (Article 15(4)(e)) cannot be covered. Further adaptations and clarifications are necessary regarding the role of the Operational Group (OG) project coordinator and eligibility conditions relevant to EIP OGs, including transnational OGs. Greece is also advised to include forest OGs in the EIP Agriculture network.

2.3.4.7. Knowledge exchange and advice (Article 78 of the SPR, section 5 of the Plan)

279. **P3-78.1 Education – training of farmers and other stakeholders:** Greece is requested to confirm that advisors are included as potential beneficiaries and link it to the R.2 result indicator. Also, since the intervention may concern other stakeholders (not only farmers), the state aid instrument must be indicated (it is necessary to tick the box “mixed”).
280. **P3-78.2: Advisory services for farmers and other interested groups (stakeholders):** Greece needs to provide a description of the eligible beneficiaries and clarify if this intervention includes training of advisors, including the calculation of the unit amount and adding the R.2 result indicator. Greece is also invited to elaborate on the organisation and coordination of this intervention by the AKIS Coordination Body according to Article 15(2), (3) and (4) of the SPR and start the intervention as from 2023. A more flexible approach is needed for this intervention,

so that it can also cover more frequent and short advice at the time when it is needed. The Commission would like to emphasise that the transition to sustainable agriculture shall require considerable effort in terms of advice and training to farmers.

2.3.4.8. Financial instruments (FIs) (Article 80 of the SPR, section 4.6 of the Plan)

281. Greece is requested to provide clarifications on the schedule of resources and details on the transition and cut-off from the 2014-2022 programming period. Also, Greece should define the average unit amounts and annual indicative financial allocation; complete details regarding to the single operation combinations (the sum of all grant support cannot exceed the total loan guaranteed or provided by the FI); and correct the text regarding non-production investment (FIs are selected probably by mistake).

3. FINANCIAL OVERVIEW TABLE

282. Greece should ensure the consistency between the financial information in sections 5 and 6 of the Plan (e.g. differences are noted for eco-schemes, CRISS, apiculture, investments).

283. It should be noted that in accordance with Article 156 of the SPR, the sum of all payments made during a given financial year for a sector - irrespective for which programme and under which legal base those took place - cannot exceed the financial allocations referred to in Article 88 of the SPR for that given financial year for that sector.

284. As regards the type of interventions in certain sectors defined in Article 42 of the SPR, expenditure that will be paid in 2023 or in the subsequent financial years relating to measures implemented under Regulation (EU) No 1308/2013 for these same sectors shall NOT be entered in the Annual indicative financial allocations under Section 5 or in the Financial Overview table under Section 6 of the Plan.

285. Direct Payments: For calendar years 2024-2027 the total amount of direct payment interventions planned according to section 5 exceeds the adjusted annual Direct Payments allocation (Annex V of the SPR excluding cotton).

4. CAP PLAN GOVERNANCE, EXCLUDING CONTROLS AND PENALTIES

286. Greece needs to provide additional information regarding the set-up of its governance systems (clarify the role of the participating authorities and implementing, intermediary bodies, including the AKIS coordination body) and fill-in the information in the missing parts, including the missing documents. In particular, Greece is requested to provide a description of the set-up of the Competent Authority as well as a description of how it will carry out its ongoing supervision of the work of the Paying Agency and its compliance with the accreditation criteria.

287. Also, Greece should provide additional information on the future membership of the Monitoring Committee with a focus to Article 124 and 106(3) of the SPR, including clarification of the composition of the Monitoring Committee, along with how it will

ensure its independence from the Managing Authority, and it would be expected that they are designated as separate bodies.

288. The Greek authorities are reminded to ensure a balanced representation of the relevant bodies in the monitoring committee concerning women, youth and the interests of people in disadvantaged situations.
289. Greece should reinforce and/or adapt the administrative structure of the competent authorities in order to safeguard good delivery of the CAP and good coordination with the other Union Funds and also ensure consistency, maximise synergies and eliminate the risk of double-funding.
290. With regard to sections 7.3, 7.4 and 7.5, comments will be delivered by the Commission services in a separate communication.

5. ANNEXES

291. Greece needs to provide the missing annexes and fill in the relevant descriptions, including additional national aid for all activities falling outside the scope of Article 42 of the TFEU. Greece should indicate where non-applicable.
292. Annex V should contain data for EAFRD participation, matching funds and additional national aids for all activities falling outside the scope of Article 42 of the TFEU.