

EN

ANNEX

Observations on the CAP Strategic Plan submitted by Slovakia

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. Slovakia 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.

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 - RED).

Key issues

Observations with regard to the strategic focus of the Plan

1. The Commission welcomes Slovakia's efforts in the preparation of the CAP Strategic Plan (the Plan) and consideration given to its recommendations of 18 December 2020 (SWD(2020) 392). The Commission takes note of the participation of stakeholders in the process of drafting of the Plan and invites Slovakia to strengthen the partnership principle during the implementation phase.
2. The Plan includes a broad identification of the challenges to be dealt with and an intervention logic that addresses a number of the needs. However, the Commission considers that certain elements of the Plan require further improvements and additional clarifications as to the strategic approach and level of ambition.
3. Slovakia is invited to verify and complete the links between the SWOT analysis and the identified needs, which are not always consistent. For several specific objectives (SO), the intervention logic and the coherence between result indicators, interventions and other elements of the Plan needs to be strengthened and further clarified.
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 Slovakia 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. The Commission considers that the Plan shows potential to contribute effectively to this general objective. The Commission welcomes Slovakia's effort to improve the fairness and targeting of the support through capping and reduction of the basic income support for sustainability (BISS) as well as the introduction of an insurance premium support scheme and financial instruments.
6. As regards the fairer distribution of direct payments, Slovakia is invited to complement the explanations provided by a quantitative analysis showing the combined effects of all proposed income support tools on the income level of farms. This will allow the Commission to fully assess whether the Plan addresses the aim of fairer distribution and better targeting of direct payments in a sufficient manner.
7. The Commission has noted the diverse types of support for investments in the Plan and welcomes the increased support for small farms and for investments linked to organic production and quality scheme products.
8. The Commission invites Slovakia to explain how it intends to address the low level of organisation among producers and their reluctance to do it, in particular as regards developing producer organisations (POs) and cooperatives in the sectors where the concentration of supply is still limited, in particular given the weakness of

an uneven bargaining power of the primary sector, as identified in the SWOT analysis.

9. The Commission recognises the importance given to income support in the Plan as well as interventions supporting competitiveness and economic sustainability. In light of the Russian invasion of Ukraine, the Commission urges Slovakia to also consider interventions that will help reduce dependence on fossil fuels and other externally sourced inputs to preserve the long-term sustainable production capacity and viability of farms. In this context, the Commission welcomes the Plan's efforts to support 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 Plan has some potential to deliver a greater overall contribution to this general objective.
11. The Commission acknowledges that the needs identified are largely coherent with the SWOT analysis and reflected in the intervention strategy, notes that the Plan covers the relevant aspects related to climate change and protection of natural resources and the justifications developed for the target values set for result indicators.
12. The Commission welcomes strengthened agri-environment-climate interventions comparing to the current period such as the establishment of agroforestry systems and linear vegetation features and the inclusion of several targeted measures in line with some needs stated in the Prioritised Action Framework (PAF).
13. However, some improvements are still needed for the Plan to contribute effectively to this general objective.
14. The links with the legislative instruments listed in Annex XIII to Regulation (EU) 2021/2115 (the CAP Strategic Plan Regulation - SPR) and the ensuing planning documents should in some cases be improved and, notably, the contribution of the Plan to the national targets set in those instruments enhanced. In particular, Slovakia is requested to take better account of the PAF and further align the proposed interventions with it.
15. In this context, Slovakia 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 - ESR) 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.
16. The Commission also welcomes the efforts proposed concerning renewable energy production and strongly encourages Slovakia to fully benefit from possibilities for interventions under the SPR by using them to increase sustainable domestic

generation and use of renewable energy, including biogas, thereby strengthening what has already been programmed in their National Energy and Climate Plan (NECP). Moreover, the Commission calls on Slovakia to support interventions that improve nutrient use efficiency, circular approaches to nutrient use, including organic fertilising as well as take further steps to reduce energy consumption.

17. The response of the Plan to the identified problems and needs could be improved by revising upwards some of the targets set for result indicators for the already planned interventions and by adjusting the intervention strategy to better address livestock Greenhouse Gas (GHG) emissions and protection of wetlands.
18. The Commission requests Slovakia to clarify and, if necessary, amend certain good agricultural and environmental conditions (GAEC) so they fully comply with the regulatory framework (see detailed comments below).
19. While the whole farm eco-scheme, combining requirements in many areas, seems to overall provide added value, it is not clear whether its requirements on preserving soil quality go in all cases above conditionality requirements. In addition, the whole farm eco-scheme requirements on non-productive landscape features also add only very modest environmental value in comparison to conditionality requirements and Slovakia is invited to further enhance the practice under the eco-scheme. While requirements limiting parcel size are very much welcomed, the proposed derogation for irrigated areas might exempt from those requirements the most intensely managed areas that actually need parcel size limits the most. Slovakia is requested to clarify these issues, provide missing information requested, and revise the whole farm eco-scheme requirements as necessary.
20. Slovakia 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.

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

21. The Commission considers that the Plan has limited potential to contribute effectively to strengthening the socio-economic fabric of rural areas. Slovakia is invited to consider additional interventions for needs of rural areas, incl. basic services and to provide further information on efforts outside the Plan to tackle the needs of the rural population so as to ensure that they are adequately addressed, with particular attention to territories, beneficiaries and sectors that are most in need, based on the SWOT analysis and specific territorial needs.
22. The Commission is concerned about the low level of commitment promoting gender equality and improving the participation of women in farming. Slovakia is encouraged to consider addressing this objective with justified and proportionate interventions.
23. The Commission welcomes interventions on animal welfare that cover sheep, goats, dairy cows and create grazing opportunities for cattle. However, the Commission

considers that the Plan has room for improvement regarding the proposed measures to enhance welfare of pigs and poultry, which seem to be not ambitious enough.

24. Within the context of the African swine fever prevention, control, and eradication, Slovakia is invited to include specific interventions and detailed actions to address the need to increase biosecurity in the entire pig sector, in particular in small commercial farms.

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

25. The Commission considers that the proposed Plan lacks a strategic approach towards knowledge sharing and innovation, as well as the appropriate level of support to related interventions to ensure improvements in coherence with the analysis of the national Agricultural Knowledge and Innovation System (AKIS). This is contrary to identified needs of Slovakia to increase the level of knowledge sharing and innovation, to support training, guidance, coordination, networking and to introduce new AKIS connections and interventions into the system.
26. The Commission encourages Slovakia to further elaborate on its digitalisation strategy and reflect on how support to digitalisation in farming and rural areas will be addressed comprehensively across the Plan and in synergy with other instruments, as the lack of detail does not allow for a proper assessment of the ambition in this regard.

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

27. The Commission notes the various explanations on the content of the Plan in relation to the various challenges outlined in the Green Deal and certain additional actions outside of the Plan. However, the Commission regrets that Slovakia did not make use of the possibility to provide information regarding national values for the selected Green Deal targets contained in the Farm to Fork Strategy and the Biodiversity Strategy. The Commission requests Slovakia to quantify these national contributions to the said Green Deal targets and to supplement the text and further explain how the Plan contributes to and is consistent with these Green Deal targets and to provide additional information on efforts pursued inside and outside of the Plan. Based on the information provided in the draft Plan, the Commission makes the following observations concerning its contribution and consistency with these targets:

- **Anti-microbial resistance (AMR):** The Commission notes the interventions proposed in the plan with the aim of reducing reliance on the use of antimicrobials as reflected in the relevant result indicator. However, further explanation is required on the main drivers behind antimicrobial consumption and the intervention logic that aims to reduce said consumption.
- **Pesticides (risk and use and the use of more hazardous pesticides):** The Commission welcomes the interventions foreseen in the Plan and considers

that they may contribute to achieving the aims of the Green Deal subject to certain adjustments of interventions and provided their take-up as defined by the Plan's targets is ensured.

- **Nutrient losses:** The Commission notes an array of actions under the Plan that Slovakia envisages to this end. For the Plan to contribute to the common EU target, it would be essential to ensure a high adoption rate for nutrient-related interventions especially in Nitrates Vulnerable Zones designated under Directive 91/676/EEC (Nitrates Directive).
- **High-diversity landscape features:** The Commission considers the Plan's level of ambition as insufficient and encourages Slovakia to reinforce the Plan to increase the area given that the current share of high-diversity features in Slovakia (1.9%) is below the EU average (4.6%) and to clarify better the potential contribution of the interventions entailing landscape elements mentioned in the Plan.
- **Organic farming:** The Commission notes the intention of Slovakia to support, with intervention foreseen in the Plan, organic farming on 14.09% of its agricultural area. The Commission observes, however, that the Plan will need to clarify the support for conversion versus maintenance as well as market development measures. The Commission also invites Slovakia to explore the scope for increasing further this level of ambition, in particular for year 2030, to strengthen its contribution to the Green Deal target of 25% of agricultural area under organic farming at EU level.
- **Rural broadband:** The Commission notes that the Plan makes no contribution to achieving the EU 2025 target to the roll-out of very high capacity broadband internet expansion in rural areas and invites Slovakia to provide further information on efforts outside the Plan to reach the 100% coverage target.

Detailed observations

1. STRATEGIC ASSESSMENT

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

28. In addition to the respective comments made in the first part of this letter, Slovakia is invited to elaborate the corresponding overview demonstrating that the redistributive needs have been addressed sufficiently. To justify the sufficiency of the strategy and the consistency of all income support tools, a quantitative analysis showing the combined effects of all relevant income support tools on income per work unit by physical size is requested (e.g. using Farm Accountancy Data Network).

29. Slovakia is invited to assess whether the Plan addresses sufficiently the support aiming at compensating beneficiaries for additional costs and income foregone related to and resulting from the implementation of Directive 2009/147/EC (Birds Directive) and Directive 92/43/EEC (Habitats Directive) since the planned outputs of the interventions under Article 72 of the SPR do not seem to be ambitious.

1.1.2. Strategic assessment of Specific Objective 2

30. The SWOT summary and/or the following narrative under SO2 clarifies the different support needs in terms of the various agricultural sectors and why, accordingly, some of them (livestock in general, sugar beet, hops, fruit and vegetables) get additional targeted aid, e.g. Coupled Income Support (CIS). However, it does not fully explain some support decisions under the intervention strategy (e.g. why only dairy, sheep and goat are targeted if the needs are identified for the livestock sector in general). Slovakia should provide further explanation.
31. In order to address the difficulties and to improve the competitiveness and sustainability of the sector efficiently, and to avoid that the proposed CIS interventions lead to a deterioration of the environmental and climate situation (e.g. resulting from intensification of livestock farming, or increased water use in water scarce regions), Slovakia is 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 for specific types of farming within a sector and CIS adapted to different local context).
32. Slovakia should clarify how the intervention 73.17 Land consolidation projects is expected to address identified need 2.1 (Increase the competitiveness of agricultural holdings by investment into modernisation).

1.1.3. Strategic assessment of Specific Objective 3

33. Slovakia intends to implement sectoral interventions for fruit and vegetables, apiculture, wine, milk, pig meat, sheep and goat and potatoes sector. Slovakia is invited to provide information whether a small "pilot" for sectoral support in other sectors have been considered.
34. Whereas the Plan indicates an uneven bargaining power of the primary sector as a weakness, Slovakia plans investment interventions targeting vertical and horizontal cooperation but no specific intervention to support setting-up of POs despite the lack of POs in most sectors which could possibly hamper the implementation of sectoral support. Slovakia is invited to explain this.
35. Regarding Geographical Indications (GI), the Plan includes only a sectoral intervention in the wine sector. Slovakia is invited to further expand the eligible products including GI scheme (Protected Designation of Origin, Protected Geographical Indication) in order to strengthen farmers' position in the value chain through the quality scheme intervention.

1.1.4. Specific strategic focus

36. The complementarity between interventions related to a certain sector should be assessed not only in a “technical” sense (i.e. list of interventions targeting the same sector and potential accumulation of support), but also in a broader, “strategic” perspective. Accordingly, Slovakia should reinforce the explanation how the combination of the relevant interventions will achieve the intended objective and thus fulfil the need identified for the sector concerned.
37. In relation to the Directive 2000/60/EC (Water Framework Directive - WFD), Slovakia is invited to clarify, in accordance with Article 109(2) (c) of the SPR, how the different situations of various river basins were taken into account in the assessment and, if needed, in their coupled support decisions in terms of access to support in vulnerable areas, if any. Given that all interventions foresee stable outputs until 2027 (i.e. no production increase), the focus should rather be on those river basins where ‘good status’ is still to be reached based upon the respective river basin management plan. The most sensitive interventions in terms of pollution are apparently those that target the dairy sector and in terms of water use those that potentially use irrigation (fruit and vegetables, hops, sugar beet and possibly certain protein crops).
38. As regards section 3.6 on the approach to risk management, whilst certain details of the elaborated description of the different schemes might not be necessary in this section, Slovakia is invited to better explain the complementarity and demarcation between the different EU and national tools, notably in view of the need to avoid double funding pursuant to Article 36 of Regulation (EU) 2021/2116. Slovakia is also invited to address in the description risks linked to market risks (price volatility).

1.2. To support and strengthen environmental protection, including biodiversity, and climatic 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

39. The Plan provides for a variety of interventions to support climate change mitigation and adaptation of the Slovak agri-food sector and forests, yet certain aspects require adjustments.
40. The Plan could be improved to better address the emissions per livestock unit (LU) from enteric fermentation, which are above EU average, such as by providing support to take up of sound feeding strategy to reduce methane emissions, in line with the Slovak 2030 low-carbon development strategy.
41. The Commission also invites Slovakia to accelerate and strengthen protection of wetlands, given their role as a major store of carbon, thus also contributing to biodiversity objectives as identified in the PAF of Slovakia.

42. More could be done to strengthen adaptive capacity of the Slovak agriculture by greater reliance on nature-based solutions to increase water retention capacity of soils beyond technical measures proposed in the Plan, as referred to in its Adaptation Strategy mentioned in the Plan.
43. The Commission invites Slovakia to strengthen the alignment of the Plan with its NECP to capture GHG emissions through afforestation, conversion of arable land to grassland and by better protecting against forest fires.
44. The Plan does not always recognise the contribution of some interventions to this objective. In particular, Slovakia is invited to consider including the intervention Grassing of arable land (70.8) under this SO's intervention logic. Although the intervention was established with the aim to protect nesting bird species, it also represents a relevant climate adaptation measure.
45. Slovakia states in the Plan that it does not currently have at its disposal the definitions of the wetland management procedures and that an analysis of the existing national wetland map documents is under preparation. The specific requirements of the GAEC 2 standard will be defined at a later stage through the modification of the Plan. Therefore, Slovakia should consider to include two new weaknesses into its SWOT analysis related to wetlands:
 - lack of input data for modelling emissions and capture projections from wetlands;
 - absence of a nationwide approach to best practices related to wetland management on agricultural land.
46. Slovakia sets a very low target for investment support contributing to climate change mitigation and adaptation, and to the production of renewable energy or biomaterials (R.16 (investments related to climate): 1.17%). Slovakia is encouraged to strengthen the Plan in this respect.
47. Promoting the establishment and maintenance of agroforestry systems, linear vegetation features and afforestation may increase greenhouse gas sinks and thereby improve both climate change mitigation and adaptation. Nevertheless, the proposed interventions are of a very small scale (target for R.17 (afforested land): 4 981 ha). Slovakia is invited to review whether the Plan addresses sufficiently the related needs in forestry and where relevant to improve its Plan.
48. Slovakia is invited to provide an estimate of the mitigation potential under the concerned interventions.

1.2.2. Strategic assessment of Specific Objective 5

49. Although the Plan describes a number of actions which may have a positive impact on achieving the reduction of the use and risk of pesticides, including the use of more hazardous ones, the target value set for the result indicator R.24 (reduced use of pesticides): 17.24% seems to be not sufficiently ambitious. Slovakia should assess whether the Plan addresses sufficiently the related need and consider

implementing further specific interventions contributing to a decrease in the use of pesticides. Moreover, the Plan could be strengthened with actions to promote the implementation of integrated pest management practices.

50. Slovakia is invited to assess whether the need linked to ammonia emission reductions is sufficiently addressed in the Plan. The target for result indicator R.20 (improving air quality): 0.81% seems very low considering that Slovakia will need to implement the measures in order to comply with its targets laid down in Directive (EU) 2016/2284 (National Emissions reduction Commitments (NEC) Directive). Slovakia is also encouraged to better target investment support for Nitrates Vulnerable Zones designated under Nitrates Directive beyond the baseline.
51. Since the share of arable land left without soil cover during the winter in Slovakia is much higher (43%) than the EU average (23%), Slovakia should better address soil protection. The proposed target for result indicator R.19 (improving and protecting soils), 19.97%, appears not sufficiently ambitious.
52. In view of the low ambition level of the target for result indicator R.23 (sustainable water use), 0.90%, Slovakia is invited to assess whether the Plan addresses sufficiently improving the water balance and reducing water demand, where relevant, to improve its Plan.

1.2.3. Strategic assessment of Specific Objective 6

53. While a number of the measures proposed in the PAF are well covered in the Plan, this is not the case for threats, weaknesses and opportunities identified in the needs analysis. Slovakia is invited to better integrate those elements identified in the PAF in the Plan and elaborate more on the measures related to forest and nature-friendly forest management proposed in the PAF and their coherence with those proposed in the Plan.
54. The intervention logic does not seem to properly address the need 6.4 (Promoting the protection of biodiversity of forest ecosystems) since the Plan provides for no intervention linked to the conservation of forest tree genetic resources. Slovakia is invited to clarify how it intends to address this need.
55. Although the Plan mentions several actions aimed at promoting organic products (training, promotion, specific rural development intervention), Slovakia is encouraged; to provide for a comprehensive description of development of this sector.
56. In view of the apparently low ambition level of the targets for result indicators, R. 25 (environmental performance in the livestock sector): 0.88%, R.30 (supporting sustainable forest management): 1.52%, R.33 (improving Natura 2000 management): 7.68% and R.34 (preserving landscape features): 1.01%, Slovakia is invited to assess whether the Plan addresses sufficiently the related needs and, where relevant, to improve its Plan.

1.2.4. Green architecture (Article 109(2) of the SPR)

57. The Commission acknowledges that the green architecture of the Plan includes a number of elements with the potential to make a positive contribution to SO4, SO5 and SO6. The needs identified are to a large extent coherent with the SWOT and reflected in the intervention strategy. However, Slovakia should improve certain parts of the intervention strategy, especially the link to the legislation listed in Annex XIII to the SPR and the needs emanating from these legislative instruments.
58. For agri-environment-climate (AEC) commitments, a better definition of the baseline for certain areas (e.g. fertilisers and pesticides, GAEC 2) is necessary as well as more precision on the management commitments for certain interventions. With regard to support of organic farming, apart from support for conversion and maintenance, information about possible support for marketing and food value chains should be provided.
59. Moreover, Slovakia should explain, in specific terms, the combinations and complementarities between eco-schemes, organic farming intervention and AEC commitments, and to justify possible geographical overlaps of this with a view to the benefit for the environment, including climate considerations.
60. Finally, Slovakia is invited to include information on how sectoral interventions are expected to contribute to the environment and climate objectives within the green architecture.

1.2.5. Greater overall contribution (Article 105 of the SPR)

61. Slovakia explains the various new elements and interventions in the Plan, which will contribute to achieving a greater overall contribution. This points among other aspects, to certain eco-schemes and to more ambitious rural development interventions.
62. The Commission very much welcomes the increase by more than 15 percentage points (without Areas with Natural Constraints (ANC)) of the European Agricultural Fund for Rural Development (EAFRD) budget dedicated for interventions relevant for climate and the environment and the inclusion of several targeted measures in line with needs stated in the PAF.
63. The Commission acknowledges the efforts Slovakia is making, especially regarding the introduction of new interventions targeting environmental and climate objectives under rural development (establishment of agroforestry systems and linear vegetation features).
64. However, the Commission is of the opinion that an increase of the overall ambition of the Plan is still required in light of Article 105 of the SPR. To realise its potential, several issues identified in relevant observations will need to be addressed, by revising the content, financial allocations, indicative outputs, and associated result indicator targets of respective interventions accordingly, to further increase the environmental ambition of the Plan, including:

- For some GAECs, more information and justifications on the choices made are necessary and some lack ambition, especially with regard to GAEC 6, as explained in greater detail in the section 2.6.1 of this letter.
- Regarding the whole farm eco-scheme, the ambition could be further improved, e.g. in the field of improving the soil structure.
- For rural development interventions contributing to the EAFRD environmental and climate ring-fencing, some further improvements are necessary, especially for the definition of the baseline. Moreover, some improvements for investments in irrigation and green investments are necessary to allow a clear green targeting of the interventions.
- Interventions targeting the creation of new non-productive landscape features, nature-friendly forest management, as well as the reduction of pesticide use beneficial for pollinators (especially in intensively managed areas) could be further improved.

1.2.6. Contribution and consistency with the long-term national targets set out in or deriving from the legislative instruments referred to in Annex XIII (Article 109(2) of the SPR)

65. Slovakia is invited to describe the contribution of the Plan to the national targets derived from the relevant legislation, including for all policies relevant to objectives SO4, SO5, SO6, including inter alia, Union legislation related to: biodiversity (Habitats Directive, Birds Directive), water (WFD and Nitrates Directive), energy (notably the RED), and climate change mitigation (LULUCF, ESR), etc. as also listed in Annex XIII to the SPR. Moreover, it should be described how and to which extent the Plan will contribute to the needs stemming from these legislations.

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

1.3.1. Strategic assessment of Specific Objective 7

66. Slovakia is requested to strengthen the intervention logic concerning the need related to access to land, in particular by better explaining the national measure to lease land to young farmers, as well as the benefits for young farmers arising from the Plan's intervention Land consolidation projects (73.17). In addition, the interplay between the three relevant instruments, namely the national land lease measure, intervention 73.17 and financial instruments to purchase agricultural land should be further detailed. Slovakia is also encouraged to address the weakness identified in relation to the lower percentage of female young farmers.

67. Result indicator R.37 (jobs in rural areas) should also be linked to SO7.

1.3.2. Strategic assessment of Specific Objective 8

68. The SWOT analysis is thorough as regards rural areas but the outcome is structured under one complex need 8.1 (Strengthening rural business, employment, services and infrastructure). The intervention strategy would benefit from restructuring by dividing the concerned need.

69. The LEADER intervention is the main intervention used to address a whole array of rural needs, at the same time it plans to cover 41% of rural population. Slovakia is invited to consider complementary non-LEADER interventions for rural areas, e.g. in basic technical infrastructure and in smart rural development, including the preparation and implementation of smart villages which are currently absent from the Plan. The LEADER intervention needs to be better targeted to ensure that the selected local strategies specifically address the needs and objectives linked to the development of rural areas in terms of basic services, infrastructures, quality of life, poverty and development of non-agricultural businesses, whilst at the same time ensuring the added value of the LEADER approach.
70. Rural tourism/ecotourism is identified as one of the major opportunities in the SWOT analysis, and the Plan could do more to capitalize on this potential. In particular the potential of income diversification through rural tourism, ecotourism and payment for ecosystem services (particularly in forests in areas of higher ecological and recreational value where public demand is shifting from their timber production function of the forest and where the threat of low wages in the extractive forestry sector is identified) remains largely unexploited, and should receive more attention.

1.3.3. Strategic assessment of Specific Objective 9

71. The Commission notes that the proposed interventions foreseen to achieve the objective of reducing AMR stem from an incomplete SWOT analysis that does not reflect the reasons behind the consumption of antimicrobials in the different animal production sectors. In addition, no need in relation to AMR has been identified, and the proposed interventions focus exclusively on generic animal welfare measures and need to be clarified to secure their effectiveness as reflected in the value of the relevant result indicator.
72. The Commission considers the proposed intervention on the welfare of pigs and poultry not ambitious enough. The additional space for fattening pigs is limited to 10% and there is no other intervention to support keeping pigs with intact tails, improving flooring, diet, thermal comfort, lowering competition for food, etc. In addition, Slovakia is invited to encourage the keeping of animals in non-confined housing system for laying hens, sows and calves.
73. The Commission notes that the Plan does not contain specific actions on biosecurity for small-scale commercial pig farms. Enhanced biosecurity in pig farming is needed to ensure sustainability in the long-term. The Commission invites Slovakia to consider specific improvements in this regard, in particular, by including in its Plan interventions to improve biosecurity practices, facilities and equipment.
74. The Commission notes that the Plan includes actions to support the shift towards healthy sustainable diets, such as promotional activities for fruit and vegetables. However, the interventions proposed seem to be limited. Slovakia is therefore invited to better explain how the shift towards healthy, more plant-based and sustainable diets will be achieved.

75. The Commission notes that the only area where food waste is partly addressed is under SO5 (referring to sustainable development and management of natural resources) rather than SO9 (which includes specifically actions on food waste reduction). While there are interventions which may refer to food waste reduction, they are not related to SO9. For example, the intervention Investments in the bio-economy (73.19) is linked to SO8 but neither to SO9 nor to SO5. Therefore, the Commission requests Slovakia to clarify the intervention logic in the area of food waste.
76. The Commission notes the reference to the National Waste Prevention Programme 2019-2025, but seeks clarification of the links between actions in the abovementioned programme with the interventions proposed in the Plan.

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 Cross-cutting Objective

77. Slovakia faces a major challenge in terms of developing a well-functioning AKIS. This requires substantial efforts in interventions which are strategic and interlinked. The proposed re-structuring to build a new AKIS structure is positive but some flaws are apparent and need to be amended. Innovation support requires the right understanding and sufficient engagement. A back-office with specialist advisors in close connection with research and the CAP Network, which can support all field advisors is missing. The organisation of advisors lacks inclusiveness while at the same time it seems to create unnecessary administrative burden. The European Innovation Partnership Operational Groups' (EIP OGs) innovative projects should include them as intensively as possible. Social innovation dimensions (SO7, SO8 and SO9) do not seem to be covered.
78. Slovakia is invited to provide more detail on the interventions related to digitalisation including on their nature and the targeted outcomes, as well as to explain the contribution of the different interventions to the target for result indicator R.3 (digitalising agriculture). At the same time, Slovakia is invited to reconsider the ambition in the number of farms benefitting from support for digital farming technology through the CAP, since the proposed target for the result indicator R.3 (digitalising agriculture) appears too low (3.04%).
79. The Commission encourages Slovakia to explore synergies with the Digital Europe Programme and to consider the potential of data and data technologies to increase the effectiveness of digital technologies in its digitalisation strategy.
80. Slovakia is invited to provide information on the quality of service of rural 4G mobile, and how when the target of 5G in all populated areas in 2030, in particular rural populated areas, will be reached outside of the CAP.

1.5. Simplification for final beneficiaries

81. Slovakia is requested to provide more information on the sharing of the data sets collected through the integrated system, as required by Article 67(3), (5) and (6) of Regulation (EU) 2021/2116.
82. Slovakia is invited to provide more information on how beneficiaries will be able to modify or withdraw declarations of agricultural parcels/animals previously applied for and about the possibility of using the area monitoring system to deal with the cases of force majeure.

1.6. Target plan

83. Slovakia is requested to provide values for result indicator R.11 (concentration of supply) for the fruit and vegetables and the potatoes sectors and to include it also for the relevant SO.
84. The numerator of the result indicator R.4 (linking income support to standards and good practices) is slightly lower than output indicator O.4 (number of hectares benefitting from BISS). Slovakia is requested to correct this inconsistency.
85. Slovakia is requested to align the inconsistency as regards the presenting result indicator R.38 (LEADER coverage). While the SO8 intervention strategy makes reference to 41%, the targets plan to 98.21%.

2. OPERATIONAL ASSESSMENT

86. For activities falling outside the scope of Article 42 of the Treaty on the Functioning of the European Union, there needs to 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. Slovakia should consider adding this element to section 4.7.3 of the Plan.

2.1. Minimum ring-fencing

87. Slovakia is invited to ensure that each intervention ring-fenced under section 5 of the Plan, be it for environment, generational renewal or LEADER, fully contributes to meeting one of those ring-fencing requirements (i.e. it must not contribute only partially) (Point 5(a)(iv) of Annex I to Commission Delegated Regulation (EU) 2021/2289).
88. In line with the provisions of Article 50(7)(a) and (c) of the SPR, Slovakia should specify in the Plan that:
 - at least 15% of the expenditure of each operational programme covers the interventions linked to environmental (Article 46(e) of the SPR) and climate (Article 46(f) of the SPR) objectives;

- at least 2% of the expenditure of each operational programme covers the intervention linked to the objective referred to research, development and innovation (Article 46(d) of the SPR).

This information should be encoded, where relevant, under sub-section “Specific design, requirements and eligibility conditions of the intervention” of the Plan.

89. As regards compliance with Article 60(4) of the SPR, Slovakia is invited to provide a breakdown of the financial data to demonstrate that 5% of expenditure is ring-fenced for environmental expenditure in the wine sector.

2.2. Definitions and minimum requirements

90. As for definitions and minimum requirements, Slovakia is requested to:

Section 4.1.1.1: confirm the application of the same definition of production as set in Article 4(1)(c)(i) of Regulation (EU) No 1307/2013 or further expand on the definition set out in Article 4(2)(a) of the SPR, which is only a framework definition.

Section 4.1.1.2.1: review the criteria of harvesting in case an agricultural activity has been already done in the year concerned and placing productive activities “sowing or planting of crops, the care of crops and the harvesting of crops within deadlines according to agro-technical practice” under section 4.1.1.1.

Section 4.1.1.2.2: indicate the criteria for maintenance of the crop and the land.

Section 4.1.2.1.2: provide elements of agroforestry applicable to permanent crop, such as tree density, size, distribution in relation to pedo-climatic conditions or management practices (whether or not differentiated per type of agricultural area).

Section 4.1.2.3.2: review the harvest cycles longer than 8 years, which do not seem to justify the qualification as coppice of short rotation.

Section 4.1.3.1: set objective and non-discriminative criteria to define the predominance of the non-agricultural activity.

Section 4.1.3.2: set objective and non-discriminative criteria to indicate that the land is actually and lawfully used by the farmer.

Section 4.1.3.5: ensure that only those landscape features, which are attached to the parcel, i.e. within the parcel (without any separation), can be included into the eligible area.

Section 4.1.4.1: set objective and non-discriminative criteria to identify an active farmer. Slovakia should ensure that active farmers performing a non-productive activity are not penalised.

Section 4.1.5: in case of legal person specify the conditions for exercising effective control in terms of capital share, voting rights or similar in accordance with the national company law;

Section 4.1.7.2: based on quantitative and qualitative data, provide a justification for the thresholds set in terms of decreasing administrative burden and contributing to the objective to support “viable farm income”.

2.3. Elements related to direct payments

2.4. CAP Network

91. Slovakia is invited to provide more information on network activities stemming from Article 126 of the SPR, in particular on work with LEADER and other territorial initiatives, monitoring and evaluation and contribution to the EU CAP network, as well as on activities of the network related to involvement of new participants (Pillar 1).

2.5. Coordination, demarcation and complementarities between the EAFRD and other Union funds active in rural areas

92. The description in section 4.5 on coordination, demarcation and complementarities should be updated after the approval of the Slovak Partnership Agreement, and/or relevant financing programmes to give the overview required in Article 110(d)(v) of the SPR.

93. Slovakia is also invited to provide a comprehensive description of how EU funds and initiatives active in rural areas work together with and concretely contribute to the Plan, in addressing certain identified needs not covered or partially covered by the Plan such as digitalisation in agriculture, social inclusion challenges, including the situation of women in farming and in rural areas. In particular, Slovakia should consider actions creating synergies between the Plan and Horizon Europe actions with specific attention to EIP OGs and Horizon Thematic Networks and multi-actor projects.

94. Slovakia is invited to clarify how synergies and complementarities with the Programme for the Environment and Climate Action (LIFE), Digital Europe Programme and Connecting Europe Facility 2 Digital will be ensured.

95. Slovakia is invited to include a description of how the Partnership on sustainable food systems for people, planet and climate is supported through the Plan’s interventions.

2.6. Interventions and baseline

2.6.1. Conditionality

GAEC 1

96. The Commission asks Slovakia to verify whether the reference ratio of 5% is the correct value for the permanent grassland ratio in 2018 as there is a large deviation from the current permanent grassland ratio in 2018 (23.88%).

97. Slovakia is requested to include the calculation method of the reference ratio as provided by Annex I point 3.1(e)(i) of Implementing Regulation (EU) 2021/2289.

GAEC 2

98. The justification provided for the application of the GAEC only from 2025 is not complete. Footnote 1 to GAEC 2 in Annex III to the SPR sets out that the delay in the GAEC application must be justified based on the needs for the establishment of the management system in accordance with a detailed planning. In light of the importance of protecting wetlands and peatlands for the protection of carbon-rich soils, the Commission invites Slovakia to envisage not to delay the application of this GAEC to 2025.
99. With respect to the mapping of wetlands and peatlands, Slovakia is invited to ensure that it is done in cooperation with environmental authorities, and that criteria applied focus on both climate considerations and conservation trends and as well as an improvement of conservation status of habitats and species of importance linked to wetlands.

GAEC 3

100. Slovakia is requested to define the specific conditions where stubble burning is authorised for plant health reasons. National procedures should be in place to ensure that the authorisation of burning of arable stubble is appropriately implemented, such as an official decision from plant health authorities.

GAEC 4

101. Slovakia should clarify whether the GAEC covers all watercourses and coastline indicated in the Land Parcel Identification System (LPIS), including smaller watercourses and water bodies. Slovakia should also clarify that for watercourses in demarcated areas (Nitrates Vulnerable Zones designated under the Nitrates Directive) pursuant to Slovak legislation (Act No 136/2000 Coll. on fertilisers) the stricter requirements of the Nitrates Action Plan under Nitrates Directive apply.

GAEC 5

102. The Commission requests Slovakia to clarify in the Plan how heavily endangered and moderately endangered areas at risk of erosion are defined (including slope gradient).
103. Slovakia is invited to provide the details of the methodology used to determine which areas are considered as heavily threatened or slightly threatened by erosion, and is invited to provide an estimate of areas and shares of agricultural area covered by requirements under GAEC 5.
104. Slovakia is also requested to provide details of the methodology used to determine the anti-erosion capacity of crops, as well as details on anti-erosion measures to be required along with an analysis of their effectiveness.
105. Slovakia is also invited to take into account wind erosion for the purpose of this GAEC and propose targeted requirements aimed at reducing associated risks.

GAEC 6

106. GAEC 6 concerns area where bare soils occurs (permanent crops and arable land excluding temporary pastures); in particular all arable land is expected to be covered. Therefore, Slovakia is requested to clarify that GAEC 6 covers permanent crops as well as all arable land of a farm.
107. Slovakia is requested to provide the details of the methodology/definition used to determine which areas are considered at risk, and is invited to provide an estimate of areas and shares of agricultural area covered by requirements under GAEC 6.

GAEC 7

108. Slovakia should increase the minimum length for which the catch crop has to remain on the land (beyond 8 weeks). The secondary crop has to be cultivated between two main crops and they should cover the full time period between the main crops resulting in a significant break between these.

GAEC 8

109. Slovakia is invited to include in the Plan the different conversion and weighing factors for the different landscape features.

GAEC 9

110. Slovakia is invited to ensure that the environmentally-sensitive permanent grassland (ESPG) layer will be regularly updated, as new areas are still being declared (for example to protect the “6510-grassland” habitat). Slovakia is invited to include those areas into the LPIS layer of ESPG grasslands.
111. Considering the importance of this GAEC (currently under ‘greening’) to protect the pastures of high natural value (HNV), Slovakia should consider a large definition of these areas taking into account the current grassland status and trends in the recent report of ‘The state of nature in the European Union - Report on the status and trends 2013-2018 of species and habitat types by the Birds and Habitats Directives (European Commission Report, October 2020)’ on the conservation of grasslands protected habitats, and the objective to achieve a good conservation status of these valuable grasslands.
112. Slovakia is invited to clarify and, if necessary, address the potential overlap between ESPG grasslands and HNV1 grasslands supported under AEC Operation Conservation of semi-natural and natural grasslands, as it would be important to also prevent the conversion ploughing of the latter.

2.6.2. For direct income support

2.6.2.1. BISS

113. Slovakia is invited to justify the unit amount better. The unit amount for BISS cannot be justified as being the result from the division of the BISS envelope by the number of estimated eligible hectares. The planned unit amount should primarily be justified on the basis of the analysis of the income needs. Taking into account the

number of estimated eligible hectares, the indicative financial allocation for BISS is the result of this exercise, not the starting point.

2.6.2.2. Complementary Income Support for Sustainability (CRISS)

114. The Commission invites Slovakia to provide further justification for the maximum CRISS hectare thresholds selected.
115. Slovakia is requested to reconsider the variation of the unit amount provided for CRISS. The variation percentage is considered to be very high and is not adequately justified. The justification of the unit amount on the one hand, and of minimum and maximum unit amounts on the other hand should be linked and these justifications should primarily be based on data related to the needs which the relevant interventions want to address. Elements of uncertainty leading to a risk of unspent funds can be added to justify the variation. However, these elements must also be explained and where possible based on data, e.g. related to under-execution in the past.

2.6.2.3. Complementary Income Support for Young Farmers

116. Slovakia is invited to specify the conditions for being “newly set up” and to explain the unit amount in view of contributing to attract and sustain young farmers.
117. The chosen 100 hectare threshold needs further justification in the light of the information that the average size of a farm held by young farmers is 38 ha.
118. Slovakia is requested to justify the high variation between the minimum and maximum unit amounts.

2.6.2.4. Eco-schemes

Whole farm eco-scheme (31.1)

119. The intervention should be linked also to result indicator R.7 (enhancing support for farms in areas with specific needs). In addition, the rationale behind the direct and significant link between the whole-farm eco-scheme and R.20 (improving air quality), R.21 (protecting water quality) and R.23 (sustainable water use) is not clear from the description of the intervention.
120. The Commission invites Slovakia to provide an indication of expected benefits in terms of maintenance and change of practice under the eco-scheme. This would allow for a better assessment of its ambition.
121. For the farm practices on arable land, the Commission encourages Slovakia to consider a more ambitious threshold as regards the area coverage to improve soil structure, and as regards the maximum parcel area. With respect to requirements for preserving soil quality, it appears that they do not all go above baseline requirements set by conditionality or other relevant environmental legislation. The Commission reminds Slovakia that eco-schemes cannot pay for practices that do not go above the baseline. Slovakia is thus required to clarify and revise as necessary a number of points with respect to this issue.

122. Article 6(2) and point 4(a)(iv) of Part 2.A of Annex III to the NEC Directive provide as an optional measure to Member States injecting slurry or incorporating manure in the soil within 4 hours to reduce ammonia emissions from livestock manure. Slovakia is thus invited to reconsider the application of livestock manure as farm fertilizer to incorporate into the soil within 24 hours.
123. Slovakia is requested to clarify, and revise as necessary, how the requirement on catch crops goes beyond, as required for eco-scheme, baseline requirements of GAECs 6 and 7 and additional requirements already in place in Nitrate Vulnerable Zones and resulting from the application of the Nitrates Directive.
124. While the eco-scheme aims to increase the percentage of non-productive areas required by GAEC 8, it appears that this increase is very limited (only 1% beyond GAEC 8). The Commission invites Slovakia to revise that percentage upwards (the additional increase could be introduced gradually over the years).
125. Slovakia is invited to clarify the scope of the proposed exemption for irrigated land and the types of irrigation practices to which it applies. Slovakia is also invited to exclude Special Protection Areas from this exemption.
126. Slovakia is invited to clarify in the Plan whether ploughing of permanent grassland is authorised.
127. To implement the intervention effectively, farm-specific advisory and farm plans should be established to help support the farmer, as currently it is up to the farmer to decide where and in what form to set aside non-productive areas and features.

Pastoral breeding (31.2)

128. Slovakia is requested to explain the link to need 1.4 (risk management).
129. The intervention mainly aims at maintaining the level of pastoralism, therefore, it is unclear how this would lead to a significant reduction of emissions (R.13) or use of antimicrobials (R.43). Slovakia is invited to reconsider the selection of associated indicators or include additional requirements supporting ammonia reduction such as low-protein feeding strategies or to remove the links to these indicators.

2.6.2.5. CIS

130. As far as the sheep meat and goat meat sector is concerned, the justification of the difficulty with regard to sheep is clear, but a similar justification for goats remains still to be elaborated.
131. Though the arguments are well presented, implementation data shows that the hop sector shrank substantially over the last couple of years. In fact, only a single beneficiary with less than 40 ha received coupled support in claim year 2020 and the CIS output indicator foresees a similarly low level (i.e. 50 ha) until 2027. Accordingly, the socioeconomic and/or environmental importance of the sector should be further clarified.

132. Several interventions only aim at giving compensation for difficulty of the sector for the duration of the Plan with no apparent intention to address it in the longer run. The aim should thus be further elaborated and, if needed, certain elements of the support decision (e.g. targeting/eligibility conditions, unit rate modulation) might also have to be re-considered in order to contribute to longer term improvements in competitiveness, quality, and/or sustainability.
133. Other interventions have elements that could address challenges of the sector in the longer run (e.g. continuous renewal of aging orchards; increase market orientation with incentive to grow more competitive varieties; encouraging higher added value production). However, the explanation should be further clarified/reinforced to enhance the focus on these requirements and their expected longer term benefits for the targeted sector. It should also be clarified how these aims are supposed to be achieved (e.g. which eligibility condition ensures a shift to high-producing orchards focused on modern varieties?).
134. Slovakia is invited to explain, in light of the support needs (difficulty and/or the aim of the support) why targeting, where relevant, focuses on certain crops/plants within the sector concerned (e.g. eligible fruits do not include table grapes).
135. Certain targeting related decisions should be further explained in light of the specific support need based upon the difficulty and the aim of the support (e.g. minimum plant density in the case of vegetables).
136. The explanation of the mechanics of how the planned unit rate and its variation was determined in light of the targeted actual support need of the sector, also taking into account the potential impact on the internal market where relevant, should be reinforced. Besides, given the various uncertainties about support need of the sector, it is actually more realistic to determine the required aid as a (limited) range of values, which in turn would also allow fixing and justifying the planned unit rate and its variation.
137. Slovakia should consider including its CIS interventions also under result indicator R.7 (enhancing support for farms in areas with specific needs).
138. The Commission should inform Member States about reduction coefficients, if any, related to the EU World Trade Organisation (WTO) schedule on oilseed (Blair House) in the observation letter. However, the Commission has not received all the final information needed yet. Once all Member States have submitted this final information, the Commission will inform Member States, if such a coefficient is needed.

2.6.3. For sectorial interventions

2.6.3.1. Fruit and vegetables

139. Slovakia is invited to verify and properly describe in the Plan how all additional requirements set out in Regulation (EU) 2022/126, for instance, the percentage for minimum water savings (Article 11(4)(a)), are to be addressed.

140. Slovakia is requested to improve and revise the presentation of the interventions, clearly distinguishing between the types of interventions chosen among those in Article 47 of the SPR. The description of each type of intervention needs to be specific and related to the objective of the intervention.
141. Slovakia is invited to verify and correct, if necessary, the link between type of interventions described and result indicators linked to the specific objectives.
142. It should be noted that the purchase of protective equipment and clothing for staff proposed under the intervention ‘Improving employment conditions’ (49.3) could be considered eligible if covered by the provisions of Directives 89/391/EEC, 2009/104/EC and (EU) 2019/1152 and transposed into the national legislation.
143. Slovakia is invited to ensure that operational programmes include three or more actions (80% of member of producer organisation rule) linked to the objectives referred to in points (e) and (f) of Article 46 of the SPR (Article 50(7)(b) of the SPR).
144. Slovakia is requested to ensure that the interventions within the types of interventions referred to in Article 47(2), points (f), (g) and (h) of the SPR, do not exceed one third of the total expenditure under operational programmes (Article 50(7)(d) of the SPR).
145. It is not sufficient to indicate the compliance with the relevant paragraph 12 of WTO Annex 2. Slovakia is invited to add a short paragraph explaining that payments cover only costs incurred/income forgone.
146. The national financial assistance, if provided, needs to be described in Annex V. In addition, the Commission would like to remind Slovakia of reporting requirements (Article 52(3) of the SPR).

Protecting and enhancing biodiversity (49.13)

147. This intervention should also be linked to result indicator R.10 (better supply chain organisation) and result indicator R.11 (concentration of supply).

Improving product quality (49.2)

148. The link to result indicator R.9 (farm modernisation) does not seem justified because the beneficiaries are not farmers but POs. A link to result indicator R.39 (developing the rural economy) could be instead established.

Improving employment conditions (49.3)

149. A link to result indicator R.11 (concentration of supply) should be added.

Improvement of water use and proper water management, including water saving, water protection and drainage (49.5)

150. The link to result indicator R.16 (investments related to climate) and result indicator R.26 (investments related to natural resources) does not seem justified because

beneficiaries are not farmers but POs. A link to result indicator R.27 (environmental or climate-related investments) could be instead established.

Increasing pest resilience and reducing the risks of pesticide use, including the introduction of integrated pest management techniques (49.8)

151. The intervention should not be put together with the Article 47(b) of the SPR Advisory services and technical assistance (actions). It needs to be encoded separately.

152. A link to result indicator R.11 (concentration of supply) should be added. When the activities relating to this intervention are carried out on farms, then the link to result indicator R.26 (investments related to natural resources) could be added, while when these are carried out on PO premises, then result indicator R.27 (environmental or climate-related investments) would be more appropriate.

Training, including coaching and exchange of best practices (49.9)

153. This intervention should also be linked to result indicator R.28 (environmental or climate-related performance through knowledge and innovation), result indicator R.10 (better supply chain organisation) and result indicator R.11 (concentration of supply).

Promotion, communication and marketing of products (49.10)

154. Slovakia is invited to remove the link to result indicator R.9 (farm modernisation) as support to promotion activities by a PO are not investments for farm modernisation.

Implementation of Union and national quality schemes (49.11)

155. The link to result indicator R.11 (concentration of supply) should be established.

Soil protection (49.4)

156. The link to result indicator R.16 (investments related to climate) climate action does not seem justified as all actions target directly soil management.

Contributing to climate change mitigation and adaptation (49.6), Intensifying energy savings, energy efficiency and the use of energy from renewable sources (49.7)

157. From the design of the intervention, it seems that both POs and their members could benefit from the intervention, thus adding a link to result indicator R.27 (environmental or climate-related investment) could be justified.

2.6.3.2. Apiculture

158. Section 3.5.2 needs to include an overview of the sector which leads to the needs identified and justification of the chosen interventions, outlining how these also address the specific and sectoral objectives as well as a description of a reliable method for determining the number of beehives in accordance with the provisions of Article 37 of Delegated Regulation (EU) 2022/126.

159. The description of interventions in section 5 needs to be improved, outlining how the interventions contribute to the relevant specific and sectoral objectives while providing a comprehensive explanation of the intervention and the supported actions, including clear examples of eligible expenditure in the areas outlined, description of eligibility requirements and a clearer definition of eligible beneficiaries. The description of supported actions needs to be fleshed out to clearly indicate and explain what is intended and what constitutes eligible expenditure under each action outlined. Furthermore, Slovakia should reconsider the placement of certain actions under a relevant type of intervention.
160. The description of supported actions is too limited to allow a proper assessment, therefore Slovakia is requested to verify and confirm that support is provided for eligible expenditure in compliance with the provisions of the relevant regulations in particular Delegated Regulation (EU) 2022/126.
161. Slovakia is invited to explain how the interventions will be implemented and why only beekeeper organisations appear as beneficiaries when the limited information on supported actions seems to indicate otherwise.
162. Repetition should be avoided, such as information in section 6 which should be specific to the intervention and clearly linked to the information provided in sections 9 and 10. Forms and rate of support should be described in the interventions although more detailed provisions can be defined in the national legislation.
163. Slovakia is invited to clarify the calculation of the result indicator R.35 (preserving beehives).
164. Slovakia is requested to properly explain in section 8 how the intervention respects the relevant provisions of Annex II to WTO Agreement on Agriculture.
165. The calculations of planned unit amounts and outputs have to be explained and justified as well as the reason why in most interventions the planned unit amounts and outputs are defined as amount per beekeeper whilst the only beneficiaries are beekeeper organisations.
166. The demarcation with EAFRD interventions should be clearly described.

Investments and other actions (55.1.2)

167. The contribution to funds set up by beekeeping organisations does not constitute an eligible expenditure as support should be provided for tangible actions carried out by the beneficiary and not for setting up such funds.

Cooperation in the field of research (55.1.4)

168. Slovakia is invited to outline the main themes and priority areas for the applied research projects supported.
169. The planned unit amount is described as “Average amount per beneficiary”, whilst the unit of output is “actions” without any explanation of the link between the two.

2.6.3.3. Wine

170. It is not clear how Slovakia intends to improve the market and increase competitiveness of farms in both the short and long term, including an increased focus on research, technology and digitalisation. Slovakia is invited to provide more information in this regard.
171. Slovakia is invited to ensure compliance with the specific eligibility conditions laid down in Article 40(2) of Delegated Regulation (EU) 2022/126.
172. The Commission notes that there is no amount foreseen for wine for 2023 in the financing plan. The possibility to include an amount for wine for 2023 will be available in SFC in the subsequent submissions.

Restructuring and conversion of vineyards (58.1)

173. Slovakia is invited to ensure compliance with the requirements of Article 41 of Delegated Regulation (EU) 2022/126 in so far as replanting of vineyards following mandatory grubbing-up is envisaged.
174. Result indicator R.27 (environmental or climate-related investments) is for beneficiaries other than farmers, and should be replaced by a link to result indicator R.26 (investments related to natural resources), which is better suited for farmers. However, the current description of the intervention suggests that a link to a result indicator related to the care for natural resources or the environment may not be entirely justified, and Slovakia is invited to provide more details on this intervention.

Information actions on wine from the European Union promoting responsible drinking of wine or promoting EU quality schemes (58.4), Actions to improve the reputation of Union vineyards by promoting wine tourism in producer regions (58.5)

175. These interventions should not be linked to any result indicators (Article 111 of the SPR). Slovakia is invited to remove the link to result indicator R.10 (better supply chain organisation).

2.6.3.4. Other sectors

176. Slovakia is invited to clarify in relation to Article 67(1) of the SPR, whether only recognised POs and their associations are considered as eligible beneficiaries or, for a transitional period, also producer groups in accordance with Article 67 of the SPR.
177. Slovakia is invited to improve and revise the presentation of the interventions and clearly distinguish between the types of interventions chosen among those in Article 47 of the SPR and the objectives pursued among those in Article 46 of the SPR. For each type of intervention, the sectoral objectives should be identified and explained in the intervention, followed by the subsequent typology of eligible expenditures.
178. The indicative list of “Subject of support” is sometimes very generic (e.g. “procurement of tangible and intangible assets” etc.), or includes items without a

clear link to the intervention (e.g. cost of market analysis, or consultancy services under type of intervention 47(1)(a) Investments). Slovakia is requested to provide the appropriate clarifications.

179. It should be noted that the purchase of protective equipment and clothing for staff proposed under the intervention Improving employment conditions (49.3) could be considered eligible if covered by the provisions of Directives 89/391/EEC, 2009/104/EC and (EU) 2019/1152 and transposed into the national legislation.
180. Slovakia is invited to verify and properly describe in the Plan how all additional requirements set out in Regulation (EU) 2022/126 are to be addressed, for instance, Slovakia is invited to indicate in the Plan how the value of marketed production is calculated for each sector, pursuant to Article 31(2) of Regulation (EU) 2022/126.
181. Slovakia is also invited to describe the demarcation with EAFRD interventions.
182. In section 6 “Form and rate of support”, Slovakia is requested to provide a precise and complete definition of Union financial assistance pursuant to Article 68 of the SPR.
183. Slovakia is invited to clarify why section 8 on WTO is referring to “domestic support” and “government programme financed by the state”.
184. As regards the potatoes sector, the detailed financial plan shall provide the breakdown of the allocation at sector level, not at intervention level. Slovakia is requested to correct the financial table accordingly.

Milk and milk products sector

Improving production planning and adapting to demand (67.4.1)

185. The link to result indicator R.9 (farm modernisation) does not seem justified because the direct beneficiaries of the support are POs and not their members.

Energy saving, energy efficiency, investment in alternative energy (67.4.10)

186. If the investments are made in the PO premises, a link to result indicators R.39 (developing the rural economy) and R.27 (environmental or climate-related investments) should be added. If the investments are only meant for PO members, then a link to result indicator R.9 (farm modernisation) should be added to the link to result indicator R.16 (investments related to climate). From the description, it is not clear if this intervention also involves production of renewable energy. If this is the case, Slovakia is invited to add a link to result indicator R.15 (renewable energy).

Concentration of supply and new marketing channels (67.4.2), Improving product quality (67.4.4), Research and Development (67.4.7), Promotion and marketing (67.4.11)

187. The link to result indicator R.9 (farm modernisation) does not seem justified because direct beneficiaries are not PO members, but POs. A link to result indicator R.39 (developing the rural economy) should instead be established.

Improving waste management (67.4.8)

188. The link to result indicator R.26 (investments related to natural resources) does not seem justified because direct beneficiaries are not PO members but POs for investments on their premises. A link to result indicator R.27 (environmental or climate-related investments) could instead be established.

Enhancing the sustainability and efficiency of transport and storage (67.4.9)

189. The link to result indicator R.16 (investments related to climate) does not seem justified as investments relate to PO premises. A link to result indicator R.27 (environmental or climate-related investment) could instead be established and the link to result indicator R.39 (developing the rural economy) added.

Crisis communication (67.4.5)

190. Slovakia is requested to remove the link to result indicator R.5 (risk management) as communication is not a risk management tool.

Pig meat sector

Improving production planning and adapting to demand (67.5.1), Concentration of supply and new marketing channels (67.5.2)

191. The link to result indicator R.9 (farm modernisation) does not seem justified because direct beneficiaries are not PO members, but POs. Therefore, a link to result indicator R.39 (developing the rural economy) should instead be established.

Energy saving, energy efficiency, investment in alternative energy (67.5.5)

192. The link to result indicator R.16 (investments related to climate) does not seem justified because the beneficiaries are POs. From the description, it is not clear if this intervention also involves production of renewable energy. If this is the case, a link to result indicator R.15 (renewable energy) could be established.

Sheep and goat meat sector

Improving production planning and adapting to demand (67.6.1), Concentration of supply and new marketing channels (67.6.2), Promotion and marketing (67.6.3)

193. The link to result indicator R.9 (farm modernisation) does not seem justified because direct beneficiaries are not PO members, but POs. Therefore, a link to the result indicator R.39 (developing the rural economy) should instead be established.

Potatoes sector

Investments in tangible and intangible assets enabling efficiency gains in volume management and quality improvements (67.1)

194. Slovakia is invited to check the established links to result indicators, knowing that for investments made on PO premises the relevant indicators are result indicator R.39 (developing the rural economy) in most cases, and result indicator R.27 (environmental or climate-related investments) when there is a contribution to the

environment and climate action. If beneficiaries of the investments are PO members, then the selected indicators are appropriate. Slovakia is also requested to clarify a link to result indicator R.22 (sustainable nutrient management).

2.6.4. For rural development

2.6.4.1. Management commitments

195. Slovakia is invited to provide a brief description of the method for calculating the amount of support in the section 7 of each intervention concerned.

196. It is recalled that uniform amounts are the default option to be used for interventions under Article 70 of the SPR. For interventions 70.4, 70.6 and 70.7, Slovakia is invited to revise tables 12 and 13, since a single average unit amount for a considerable number of different commitments with different premia does not seem justifiable.

197. The reasons for only partial compensation of the cost incurred and income forgone is missing in a number of interventions (70.4, 70.6 and 70.7). The Commission invites Slovakia to consider full compensation to deliver on targets.

198. Slovakia is requested to strengthen explanations on how the proposed interventions go beyond GAECs, the Statutory Management Requirements (SMRs) and eco-scheme requirements.

*Protection and maintenance of the established agroforestry system (70.1),
Protection and maintenance of the established linear vegetation features (70.2),
Protection and maintenance of the afforested agricultural land (70.3)*

199. These interventions should be linked to result indicator R.17 (afforested land) because this support follows the investment in the establishment of agroforestry systems, in linear vegetation features and in afforestation and there are no requirements beyond mandatory ones to justify the other links established by Slovakia. A link to result indicator R.34 (landscape features) could be established for 70.2.

Organic farming (70.4)

200. Based on the recognised contribution of organic farming, Slovakia should, in case the support is for farming systems including livestock husbandry, also consider whether result indicators R.43 (limiting antimicrobial use) and R.44 (improving animal welfare) could be relevant.

201. There is no differentiation of support between conversion to and maintenance of organic farming. Slovakia is requested to explain why no differentiation is deemed necessary in view of the specific circumstances during the conversion period and to provide the details on expected organic area under conversion and under maintenance.

202. Slovakia is requested to provide clarification as to the consistency with the sectoral interventions, which includes the support for organic potato production (100 ha),

vegetables (300 ha) and fruit (1 800 ha). Whereas it is positive to support organic farming under potatoes and wine schemes, Slovakia is invited to elaborate more on the target area and whether this sufficiently reflects the identified needs and the potential in these sectors.

203. Slovakia is invited to link the intervention to the need 5.1 Protection of groundwater from negative impacts of agriculture- over-application of nutrients.

AEC Interventions

204. Eligibility criteria should be elaborated rather than selection criteria as the hectares covered by AEC should respond to the needs. Furthermore, Slovakia intends to define detailed criteria in the national legislation. These criteria need to be specified/summarised in the description of the management commitments (and if necessary supplemented via eligibility criteria).
205. The section “Link between GAEC, SMR and national standards with the intervention” needs to be filled in where missing.

AEC - Precise fertilisation of arable soils - protection of water resources (70.5)

206. Slovakia is invited to clarify what will actually be monitored annually by the relevant institutions and whether the target area covers all drinking water protected areas or only certain ones.
207. Eligibility conditions and the exception with regard to areas under GAEC 4 need to be clarified.
208. The calculation is not based on management commitments but rather relates to investment/planning costs. The savings that more precise fertilisation can deliver are not proposed to be reduced from the premia.
209. Slovakia is requested to clarify how the proposed requirements go beyond minimum requirements already in place in Nitrate Vulnerable zones. Slovakia is also invited to take into account the risk of ammonia emissions when drawing up the fertilisation plan.
210. Slovakia is invited to clarify if the intervention can also be used by farmers opting for partial or full fertilisation by manure, so that the benefits of precision farming can be combined with improvements in soil structure and long-term soil fertility.

AEC - Environment-friendly management practices on arable land, orchards and vineyards (70.6)

211. The baseline for this intervention needs to be clarified as regards the mandatory components of the Directive 2009/128/EC (Sustainable Use Directive - SUD), included as SMR. Only for practises going beyond this can the AEC compensate.
212. Slovakia should explain how the “preferential use of biological plant protection products” will be monitored and clarify what need is addressed by the focus on heavy metal sampling, whether it is leaching to water or a health risk.

213. There are many sampling/monitoring actions, which could perhaps allow for a results-based part of the premia to be considered in addition to the management prescriptions.

214. The rationale behind the direct and significant link between this intervention and result indicators R.14 (carbon storage), R.19 (improving and protecting the soils) and R.21 (protecting water quality) should be justified.

AEC - Protection and conservation of biodiversity (70.7)

215. Slovakia is encouraged to explore possibilities of further ambitious commitments. In this respect, the PAF could guide Slovakia to enhance its proposals on biodiversity.

216. The rationale behind the direct and significant link between this intervention and result indicators R.14 (carbon storage) and R.21 (protecting water quality) should be justified.

AEC - Grassing of arable land (70.8)

217. The conditions of the operation do not translate all the specifications described in the general text of the intervention (with regard to water level, and priority bird habitat). It appears as though the intervention could be applied to any arable land.

218. With regard to financing, it is stated that “a reduced payment may be granted - combined - or a higher rate of the interventions will be granted in order to avoid double financing”. However, the descriptions of all green architecture interventions – their baselines and their commitments/management practises must be sufficiently clearly described to understand what will be paid for under each to prevent double funding. A general clause is not sufficient.

219. Slovakia should include GAEC 2 on wetlands and peatlands as a baseline which is relevant for this intervention.

220. The link to result indicators R.21 (protecting water quality), R.22 (sustainable nutrient management) and R.24 (sustainable and reduced use of pesticides) should be considered too, as well as a link to R.33 (improving Natura 2000 management) if the eligible area is in Natura 2000.

Breeding and maintaining endangered livestock breeds (70.9)

221. The intervention should comply with the relevant provisions of Article 45 of Delegated Regulation (EU) 2022/126. The minimum herd size per breed should be reconsidered to ensure it is adequate to achieve the aims of the intervention, and to avoid excessive administrative costs; one LU is not adequate. Slovakia is also invited to reconsider the duration of one year as this is very short to achieve the aims of the intervention.

222. In terms of the baseline, Slovakia is invited to explain how the intervention builds on experiences from 2014-2020, and how the support will improve upon the current situation. The SMRs listed, while commendable, do not address genetic resources.

223. The possibility to change livestock species and breeds year-on-year, should be clarified.
224. The intervention should be marked as an Integrated Administration and Control System (IACS) intervention as it is based on LU and type of payment as unit cost as the unit amount per breed is specified.

Forest-environmental and climate services and forest protection (70.10)

225. To provide better protection of the capercaillie, species requirements in the Special Protection Areas' management plans should be reflected in the forest management plans with occurrence of species.

Promoting animal welfare (70.11)

226. The overview of SO9 intervention logic makes reference to two animal welfare operations - Improving conditions in the wintering ground for suckler cows and Alternative rearing system for laying hens, however these operations are not included in the intervention. Slovakia is requested to align the inconsistency.

2.6.4.2. ANC

227. Slovakia is invited to specify if the compensation and the range of support are limited to all or only to part of the additional costs and income foregone related to the areas facing natural or other area-specific constraints.
228. It should be noted that the eligibility conditions should clearly specify that ANC payments can only be granted to active farmers for designated ANC areas.
229. Slovakia is invited to provide further clarification as regards the proposed degressivity thresholds and explain why additional costs or lost income could not be offset by economies of scale at lower thresholds.

2.6.4.3. Natura 2000 payments/WFD payments

230. Slovakia is invited to consider introducing an intervention on WFD payments since mandatory instruments could usefully complement voluntary interventions to help reach good status of water bodies by 2027 as required under the WFD.

Natura 2000 payment on forest land (72.2)

231. Slovakia is invited to provide more detail on the restrictions stemming from the implementation of the Birds and Habitats Directive in forests and to explain how the reduced support level (compared to the current Rural Development Programme) will ensure the right compensation level.

2.6.4.4. Investments, including investments in irrigation

232. For the concerned interventions, Slovakia should explain why the implementation is foreseen to start only in 2025/2026.

233. For most of interventions, the proper explanation and justification related to the value of the unit amount is missing. The general clause that the “average unit amount depends on type of investment” is not acceptable.
234. The information on eligibility of the second-hand equipment and leasing purchase could be included in section 4.7.
235. Slovakia is invited to consider, where relevant, the guidelines of the EU Forest Strategy on closer to nature forestry and biodiversity friendly afforestation, protecting old growth forests once they will be adopted and published.
236. Slovakia is requested to ensure that the CAP support is not provided to logging activities that do not comply with Article 6(3) of the Habitats Directive; in this respect, Slovak authorities’ attention is drawn to the standing infringement procedure before the Court of Justice.

Establishment of agroforestry systems (73.1)

237. A link to result indicator R.16 (investments related to climate) could be considered.

Establishment of linear vegetation features (73.2)

238. Slovakia is invited to further elaborate on the non-productive character of this intervention, demonstrating that the main purpose of the planted trees is purely environmental and climate related. Information on eligible trees and shrubs should be provided as well.
239. A link to SO5 may be also considered as well as a link to result indicator R.16 (investments related to climate).
240. In the section “Type of payment”, the type of simplified cost option should be clarified, since it seems that the payment is established as a unit cost (EUR/ha) and not a lump sum. Moreover, Slovakia should clarify if the payment should only cover additional costs as stated in section 12, since the support for investments can cover all eligible costs incurred by the beneficiary and not only additional costs.
241. Section 13 should be verified regarding the unit used (hectares instead of operations) and the financial planning (it should represent the expected payments per financial year).

Afforestation of agricultural land (73.3)

242. Slovakia is invited to indicate the type of state aid clearance and to consider linking the intervention to result indicator R.16 (investments related to climate).
243. It would be very beneficial if this intervention could target (or give higher compensation to) afforestation in areas that would lead to less fragmented forests by connecting already forested land.
244. Slovakia is asked to provide relevant information justifying how it ensures consistency with environmental and climate-related objectives, if the intervention is subject to a forest management plan or equivalent, and if it is in line with

sustainable forest management principles, as developed in the Pan-European Guidelines for Afforestation and Reforestation. For the selection of species, varieties, ecotypes and provenances of trees, Slovakia is invited to take account of the need for resilience to climate change and to natural disasters and the biotic, pedologic and hydrologic condition, as well as of the potential invasive character of the species.

245. Slovakia is invited to consider reporting planted trees under action 1 of MapMyTree portal in the context of the 3 billion trees Planting Pledge of the Commission.

Productive investments in agricultural holdings (73.4), Productive investments in agricultural holdings – young farmer (73.5)

246. The current description of the interventions does not allow for a proper assessment. Information on “Selection criteria” and “Range of support” make reference to different type of investments, however those are not described under “Eligible investments”. Slovakia is invited to provide more details.

247. Slovakia is invited to confirm whether all proposed eligible investments exclusively concern on-farm investments, including investments in processing and installation of outlets.

248. Slovakia is invited to define the size of the farms and in particular of small farms eligible for support.

249. For energy efficiency, it should be noted that the actions should go beyond the baseline when complying with relevant EU legislation.

250. The description mentions support for installations for energy production from renewable sources without any specification. Slovakia is requested to confirm that eligibility conditions comply with the RED and its sustainability criteria and to specify the type of renewable sources.

251. Information about the eligible sectors is missing. Slovakia should develop and explain the consistency and synergies with the relevant sectoral interventions.

Vertical cooperation of primary producers and processors (73.6), Investments in capacity expansion in processing plants (73.7)

252. Slovakia should clarify the description of the interventions and define demarcations with the interventions 73.4 and 73.5.

253. Information about the eligible sectors is missing. Slovakia should develop and explain the consistency and synergies with the relevant sectoral interventions.

254. In the intervention 73.7, it is indicated that an energy efficiency will be targeted too, however, no detail is provided about what activities will be supported.

Investments on farms to reduce greenhouse gas and ammonia emissions (73.8)

255. In order to qualify for a higher support rate and count towards the environmental ring-fencing, it has to be assured that the entire investment goes beyond normal

standards and mandatory requirements. From the description of the intervention, this is not fully clear and Slovakia is therefore requested to clarify that all eligible investments under this intervention go beyond the respective legal requirements and are beneficial for the environment. For example, support for normal tractors cannot qualify for a green investment as referred to in Article 73(4)(a)(i) of the SPR.

256. Result indicators R.9 (farm modernisation) and R.26 (investments related to natural resources) should also be considered for this intervention.

Productive investment in expanding and building new irrigation on farms (73.9), Productive investment in expansion and construction of new infrastructure irrigation outside farms (73.10), Productive investments in the reconstruction and modernisation of existing infrastructure irrigation (73.11)

257. Slovakia is invited to clearly distinguish between investments in the improvement of existing installations and investments leading to a net increase of irrigated area. This has implications for linking to relevant specific objectives and result indicators (SO2: R.9 (farm modernisation) or R.39 (developing the rural economy) for expansion, and SO5: R.26 (investments related to natural resources) or R.27 (environmental or climate-related investments) for improvements. Also, different unit amounts (with planned outputs at the level of the unit amounts) will be needed for improvements and expansion.

258. Slovakia is asked to consider that the potential water savings of a minimum of 5% which are proposed for investments in the modernisation of existing installations would only be adequate for installations which are already very efficient and is requested to increase the percentage for less efficient installations. The eligibility conditions need to reflect all relevant requirements of Article 74 of the SPR, including a percentage for an effective reduction in water use for areas where water bodies have less than good status in quantitative terms, which should contribute to the achievement of good status of those water bodies.

259. Regarding interventions 73.10 and 73.11, the scope needs to be clarified and overlaps need to be avoided. Both interventions seem to include both improvements of existing equipment as well as expansions (investments leading to a net increase of irrigated area). The latter cannot be counted towards the environmental ring-fencing.

260. It should be noted that where investments in the creation or expansion of a reservoir for the purpose of irrigation are supported, the provisions of Article 74(7) of the SPR apply. Where such investments are linked to an increase in irrigated area the provisions of Article 74(6) of the SPR apply.

Investments in water retention measures outside farms (73.12)

261. The intervention concerns investments in the reconstruction of hydromelioration/drainage channels. Slovakia is invited to elaborate on the adequacy of classifying this intervention as a non-productive investment and of linking it to SO4 and R.27 (environmental or climate-related investments). Slovakia is therefore asked to provide relevant information justifying how the design of the intervention ensures

consistency with environmental and climate-related objectives and prevents negative impacts on the environment.

262. Moreover, the output indicator O.22 (number of supported infrastructure investment operations or units) seems to be more adequate for this intervention.

263. A link to R.39 (developing the rural economy) could be established when the intervention implies the creation of infrastructure.

264. Investments in water retention measures outside farms are linked to the need 4.1 Adaptation of land to climate change and mitigation. Slovakia is invited to explain how the water retention capacity of the landscape will be increased.

Investments in increasing the water retention function of the forest (73.13)

265. Slovakia is requested to better describe the climate adaptation aspects, particularly on watershed management, water retention aspects of the intervention.

Forest restoration projects (73.16)

266. Eligible investments aiming to increase forest resilience and adaptive capacity to future climate conditions, include mainly support for the acquisition of the necessary technical equipment and activities such as protection of young forest stands against the weeds and wildlife, installation, monitoring and removal of pheromone traps and installation, monitoring and sanitation of trap logs but limited detail on further measures to build forests' resilience against climate change. Slovakia is invited to clarify this.

Land consolidation projects (73.17)

267. Slovakia is asked to further explain the stage of consolidation projects to be supported, describe in detail the relevant activities and the territorial targeting, and define principles of selection of the land consolidation projects as well as further clarify the link with the Intervention Building of joint facilities and measures - elements of green and blue infrastructure (73.18).

268. Slovakia is requested to describe the complementarities with other national funds as it is stated in section 2.1.

269. The number of projects and financial allocation given in section 2.1 and in the financial table of the intervention are not coherent.

270. Slovakia is invited to define large-scale infrastructure and to include a definition either in the description of the intervention or in section 4.

271. A link to result indicator R.39 (developing the rural economy) could be established.

Building common facilities and measures - Green and blue infrastructure elements (73.18)

272. This intervention is classified as a non-productive investment counting towards the environmental ring-fencing. Green non-productive investments (as referred to in

Article 73(4)(c)(i) of the SPR) should be limited to non-remunerative investments linked to the delivery of purely environmental and climate benefits. Slovakia is requested to provide more detailed information on the eligible investments and improve the targeting of the intervention towards climate and environmental objectives. Among others it should be clarified which concrete water management measures are planned to be supported under this intervention.

273. Output indicator O.22 (number of supported infrastructure investment operations or units) is more appropriate for this intervention.

Investments in the bio-economy (73.19)

274. Slovakia should explain why no support is foreseen for this intervention until 2026 and is encouraged to start with the implementation of the intervention earlier.

2.6.4.5. Installation aid

Attracting and retaining young farmers (75.1)

275. Slovakia is reminded that the definition of young farmer is common to both pillars and is requested to put the elements pertinent to the definition, namely the head of the holding and the appropriate training and skills, in section 4 of the Plan in order to ensure consistency.

276. A link to result indicator R.37 (jobs in rural areas) should be added for this intervention.

2.6.4.6. Risk management

Financial contributions to commercial insurance premiums for insurance schemes in agriculture (76.1)

277. Agricultural risk management tools may address the growing risks that the changing climate represents in agriculture. Slovakia is invited to consider incentives for farmers to take proactive measures reducing their vulnerability and increasing their adaptive capacity to climate change.

278. Slovakia is requested to indicate if insurances cover single or multi-peril losses and to provide more information regarding the methodology for the calculation of losses, including the use of indexes and under which conditions this is foreseen.

279. More information regarding the arrangements to ensure that overcompensation is avoided in order to justify that this risk is properly addressed, notably in view of the other (national) risk management schemes and sectoral interventions needs to be included.

2.6.4.7. Cooperation

LEADER (77.1)

280. In addition to the relevant observations reported in the sections above, Slovakia is invited to streamline the description of the intervention and to improve the

coherence of the text (certain parts of the elaborated description are too detailed or duplicated).

281. Slovakia is asked to clarify how it will ensure that all Local Action Groups (LAGs) will implement all the LEADER features as provided in Regulation (EU) 2021/1060.
282. Slovakia is invited to explain the proposed reduction of the number of LAGs from currently 110 to 65.
283. Slovakia is also requested to clarify/streamline the delivery mechanisms (especially functions of LAGs and their links with Managing Authority/Paying Agency).
284. Further clarifications are needed for the calculation of the result indicator R.38 (LEADER coverage), outputs tables, aid intensity and simplified cost options.

EIP OGs (77.2)

285. Slovakia is invited to clarify why the first outputs are expected in 2026 not earlier. The intervention should be activated as from 2023 with annual calls or possibly constantly open calls, specifically for the development of grassroots ideas which were captured and developed through the innovation support.
286. The way of supporting the preparation of the OG project should be explained, i.e. whether it is part of the budget of the project, or it is supported through the intervention 78.2.
287. The dissemination of OGs' plan and innovative results to the national and EU CAP networks needs to be added to the eligibility conditions, pursuant to Article 127 of the SPR.
288. A reference to the interactive innovation model in the eligibility conditions of the EIP OGs (Article 127(3) of the SPR) needs to be added. Slovakia should note that projects with the seal of excellence not necessarily fulfil these conditions, and may not be eligible for that reason, unless they are adapted to this effect.
289. It should be clarified how advisors will be encouraged or obliged to join EIP OGs since they can give input on practical issues, they can be a perfect intermediary between research and practice, they know the needs of their client-farmers, can broaden dissemination and communication on the project, and the project may even change the mind-set of the advisors themselves (e.g. in the case of environmental/climate projects).
290. The Commission strongly encourages Slovakia to implement AGRI EIP OGs projects at interregional, transnational and cross-border level. It should also be indicated concretely how this will be organised and incentivised.
291. Since the targeted areas of EIP OGs are too widely defined and at the same time the intervention is linked to result indicator R.28 (environmental or climate-performance through knowledge and innovation), Slovakia is invited to clarify

whether the concept of carbon farming and other environment and climate topics are also included.

2.6.4.8. Knowledge exchange and advice

Transfer of innovation and knowledge through education (78.1)

292. Slovakia is invited to clarify whether the outcomes of the EIP OGs' projects will be used for education purposes.

293. The inclusion of advisors to lead the training/on-farm demo activities should be considered since they understand the needs and language of the farmers very well.

294. Slovakia is invited to explain why the first outputs are expected in 2025 not earlier.

Transfer of innovation and knowledge through advice (78.2)

295. Slovakia is invited to clarify how the implementation of this intervention will be organised and coordinated by the AKIS Coordination Body, taking into account all obligations listed in Article 15(2),(3) and (4) of the SPR, including the implementation modes and the obligatory training of advisors.

296. Slovakia should explain how the provision of advice will be aligned with the specific demands for knowledge and innovation of agricultural holdings.

297. Slovakia is invited to reconsider the certification system which hinders flexibility and openness to all advisors. It also appears to bring along extra costs.

298. The eligibility condition that each advice/training of advisor must cover at least one of the requirements of Article 15(4) of the SPR is very limiting for many other subjects where advice is needed. Slovakia is invited to reconsider more topics and budget allocated.

299. Slovakia is invited to clarify whether visits or exchanges abroad will also be part of the training of advisors.

2.6.4.9. Financial instruments

300. Slovakia is invited to clarify the conditions of the provision of grant in a single operation with financial instrument support, such as the type of the grant (e.g. interest rate subsidy, performance based grant, convertible grant, capital grant), the triggering mechanisms for accessing the grant and the maximum ratio within the loan finance.

301. The eligibility of working capital finance, if envisaged, and its aid ceilings, should be clarified.

3. FINANCIAL OVERVIEW TABLE

302. In the PAF, Slovakia estimated financing needs from EAFRD of EUR 425 000 000 EUR for biodiversity and EUR 223 000 000 for Natura 2000. Slovakia is invited to explain how the needs in the PAF are reflected in the Plan.

303. It is recalled 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 basis those took place - cannot exceed the financial allocations referred to in Article 88 of the SPR for that given financial year for that sector.
304. 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.
305. A typing error needs to be corrected in line 4, CIS amount for financial year 2024.
306. Slovakia is requested to ensure that the total of rows 35 to 38a corresponds to the amounts indicated in row 34.
307. The total of the rural development interventions together with the amount corresponding to 3.03% technical assistance, exceeds the total EAFRD allocation.
308. The coherence between the financial data encoded in section 5.3 of the Plan (rural development interventions) and in the overview table in section 6.1 needs to be ensured (only totals should match for rural development).
309. Concerning Article 91(3) of the SPR (transfers from the first pillar), applicable rates need to be introduced for rural development interventions in section 4.7.4.

4. CAP PLAN GOVERNANCE, EXCLUDING CONTROLS AND PENALTIES

310. Slovakia is 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.
311. Slovakia is invited to provide a description of how the Competent Authority will carry out its ongoing supervision of the accreditation of the Paying Agency and its compliance with the accreditation criteria.
312. Slovakia is invited to describe the IT systems and databases developed for the extraction, compilation and reporting of data to be used for performance reporting, reconciliation and verification purposes, along with the controls in place to ensure the reliability of the underlying data.
313. The observations regarding sections 7.3 to 7.5 of the Plan will be delivered in a separate communication.

5. ANNEXES

314. In Annex I to the Plan, Slovakia is invited to include the main recommendations of the strategic environmental assessment (SEA) taking into account the results of the public consultation and to provide the finalised SEA report. Moreover, for all recommendations the proper information on how they have been addressed or a justification of why they have not been taken into account shall be included.

315. Annex VI to the Plan on Transitional National Aid (TNA): Slovakia is invited to consider providing an overview indicating clearly per TNA intervention the existing eligibility condition related to the reference period that is changed and the new corresponding eligibility condition.

Slovakia should also provide additional information regarding the complementarity of the TNA with the interventions supported under the Plan.