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**REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND
THE COUNCIL**

**on the operation of the new delivery model by the Member States and contribution of
Member States' CAP Strategic Plans to achieving environmental and climate-related
commitments of the Union**

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INTRODUCTION

Since its introduction, the common agricultural policy (CAP) has evolved significantly, addressing emerging needs and adjusting its modalities. **The new delivery model for the CAP 2023-2027 shifted emphasis from compliance with detailed EU rules to a performance-based policy driven by objectives. The aim is to achieve tangible results and deliver on the common objectives, while giving Member States more flexibility in deciding on the details of the policy.**

Central to this model is (i) a single planning tool – a CAP strategic plan for each Member State¹ – integrating for the first time instruments of both CAP funds into common intervention strategies; (ii) greater stakeholder participation; and (iii) a focus on performance, with the establishment of a common performance framework and the performance review process. This approach was introduced to improve the coherence and increase the effectiveness of CAP interventions, while better addressing specific and diverse national needs in contributing to the achievement of the common EU CAP objectives. The new delivery model also entails a new approach to assurance where audits focus on the design and functioning of the Member States' governance systems instead of auditing individual beneficiaries.

This delivery model has already been subject to several adjustments and simplifications based on stakeholders' feedback and Member States' requests after two years of implementation. The insights from its implementation have also guided the proposal for the future period 2028-2034.

This report responds to the co-legislators' request (Article 141(3) of Regulation (EU) 2021/2115 of the European Parliament and of the Council²) to present information on the operation of the new delivery model and a first assessment of the contribution of interventions planned in the 28 CAP strategic plans to the achievement of the EU's environmental and climate objectives.

I. OPERATION OF THE NEW DELIVERY MODEL BY THE MEMBER STATES

A. Strategic and more evidence-based design of CAP plans

The Commission made a proposal for a reformed CAP in 2018 in line with the 2021-2027 Multiannual Financial Framework. Following negotiations between the EU co-legislators, the CAP regulations were only adopted in 2021, to be operational from 1 January 2023.

To help Member States prepare and design their CAP plans, the Commission launched a structured dialogue in 2020, with exchanges on the status of agriculture and rural areas in each Member State, and published specific recommendations in December 2020³.

¹ Except for Belgium.

² Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013 (OJ L 435, 6.12.2021, ELI: <http://data.europa.eu/eli/reg/2021/2115/oj>).

³ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Recommendations to the Member States as regards their strategic plan for the Common Agricultural Policy, COM/2020/846 final.

To design their interventions, Member States were required to produce a thorough assessment of needs, based on an analysis of the strengths, weaknesses, opportunities and threats (SWOT) of their territory and agri-food sector, and to develop a precise intervention logic. The assessment was required to be exhaustive, by assessing whether needs would be addressed through the CAP plans or other EU or national tools considered a better fit for the purpose.

The plans were approved by the Commission in the second half of 2022 following the formal replies to the observation letters from the Commission in response to each plan submitted.

1- New governance

Strategic planning has led to reorganisations and new working methods in Member States' administrations. A single plan covering all interventions required greater collaboration between departments in charge of direct payments, rural development and sectoral support, but also greater coordination between regional and national ministries/departments. Member States with strong collaborative working practices between administrations, with clearly established responsibilities and efficient channels of exchange were able to adapt more quickly to this new delivery model. However, some Member States with a specific division of national and regional competences encountered some difficulties.

Dynamics vary widely across Member States, but the new delivery model has brought about better governance of the CAP with explicit legal provisions on the role of partnership. The required involvement of stakeholders in designing and implementing the plans has led to a better alignment to Member States' needs. However, while regional/territorial input was possible in the plans, some regions felt they had less say in the design of the plans and experienced some input delays due to national coordination. The length of the plans (often several thousand pages) was also identified as an issue by several managing authorities and stakeholders.

2- Design based on a needs assessment and different planning choices

To design their plans, Member States used SWOT analysis, partnership consultations, the Commission's recommendations and observation letters. They highlighted that while the analysis and identification of needs took place under good conditions, the late adoption of EU legislation reduced the time dedicated to finetuning the design and planning of interventions and to innovate. Anticipation at national level was crucial at this stage.

The plans were largely used to address socio-economic, environmental and climate-related needs. For the period 2023-2027, 8% of the CAP allocation was planned for rural development besides agriculture. For renewable energy, innovation, digitalisation, risk management knowledge sharing and, to a certain extent, rural policy measures, some Member States planned to achieve their objectives as well with other EU or national funding, requiring closer coordination and revealed potential for more synergies.

Good planning is the corner stone of a performance-based model, but it proved difficult. Planning annual outputs, unit amounts and result indicators (targets) for financial years 2023 to 2027 required relevant data, good evidence from stakeholders and experienced staff. Member States have adopted different strategies, with some programming on a high granular level (e.g., numerous unit amounts and outputs set at the

level of each sub-intervention), while others opted for less granularity (e.g., at the level of each intervention). For example, 1 913 interventions and 10 754 sub-interventions are planned in the 28 CAP plans. The most diversified types of intervention are environmental and climate interventions (5 282 sub-interventions) under rural development and investments (2 172).

3- Assessing the plans required a comprehensive approach

The Commission's assessment considered whether the plans submitted were consistent with the requirements of EU legislation and contributed to the achievement of 10 specific CAP objectives. Attention was paid to the contribution of the planned intervention strategy to achieving environmental and climate-related objectives, including certain EU Green Deal targets, and their coherence with, and contribution to, the EU environmental and climate legislation⁴, with no backsliding compared to the 2014-2022 period⁵.

The CAP's ambition is reflected in the targets set at result indicator level which are to be reached through the supported interventions. It is also reflected in the detailed requirements and eligibility conditions of those interventions. To support the objective assessment of the plans, from an environmental and climate-related perspective, a matrix developed by the Joint Research Centre provided evidence on the link between farming practices and objectives⁶.

The objective assessment of the adequacy of the intervention strategy and target levels of each plan in view of the national needs and objectives identified by the Member State was a complex process, notably due to (i) different situations and priorities in Member States; (ii) different levels of planning; (iii) complex links between interventions and targets; (iv) targets expressed in a different unit to objectives (e.g., share of area versus change in CO₂eq.); and (v) national legislation or tools other than the CAP contributing to the achievement of the same objectives.

B. Implementation of plans is on track

After the Union secondary legislation was adopted at the end of 2022, Member States completed their national CAP implementation framework (legislation, application processes, IT systems). Administrations had a considerable workload, especially as implementation of the 2014-2022 rural development programmes is continuing in parallel for three more years (until the end of 2025). In practice, this has led to capacity issues and high time pressure on the development of IT tools, the preparation of calls for projects and, sometimes, delays and late communication with beneficiaries, affecting uptake and perception by farmers.

Annual performance reports, the main reporting tool of the new delivery model, have two parts: one, qualitative, presents the progress made in implementing plans, while the other, quantitative, provides performance indicators and justifications for deviations from the milestone values of results indicators.

Due to the timeline of the implementation of the interventions, the performance report for financial year 2024 submitted in February 2025 was the first report containing data on all

⁴ Listed in Annex XIII to Regulation (EU) 2021/2115.

⁵ Article 105 of Regulation (EU) 2021/2155.

⁶ See references 1, 2 and 9 in the accompanying Staff Working Document. References, as well as additional data, can be found in the Staff Working Document accompanying this report.

result indicators and most interventions planned. Under the new delivery model, Member States planned annual outputs and results related to income support, rural development and sectoral interventions for the first time.

1- Good planning of area-based interventions

The comparison of planning and realisation makes it possible to assess progress in implementing the plans and the difficulties faced.

- Basic income support is the intervention with farmers' uptake closest to planning at EU level (100%) but also in each plan.
- The uptake of redistributive income support corresponds to 98% of the planned EU value, with some variations among plans.
- However, coupled income support and the top-up for young farmers have been more difficult to plan.
- As a newly introduced instrument, the uptake of eco-schemes has generally been underestimated, as they cover 10% more area than planned at EU level, with significant variations among plans.

At EU level, the uptake of rural development area-based support has reached between 87% and 91% of the planned area. Investment, installation support, and training or cooperation projects are usually slow to start in the early years of the programming period, especially if new interventions overlap with similar measures from the previous programming period. Overall, expenditure in these areas was lower than anticipated, except for non-productive on-farm investments.

2- Difficulties of planning intervention unit amounts

Member States can adjust the payment to the beneficiary based on the uptake of an intervention (within a range), given the difficulty of anticipating the uptake and the need to better manage financial envelopes. Only half of eco-schemes were paid at the unit reference amount ($\pm 10\%$). Coupled support was generally more rewarded than planned, with a lower uptake than anticipated. Fine-tuning investment aid was difficult as only 23% of the sub-interventions were paid at the average reference amount ($\pm 10\%$). The observed discrepancies were mostly due to changes in the economic and geopolitical context since the preparation of plans or low accuracy of uptake estimations.

3- Discontinuation of performance clearance

The objective of the annual performance clearance exercise was to check that all declared expenditure had a corresponding output. This was verified by comparing for each intervention the realised unit amount calculated based on the annual performance report with the (maximum) planned unit amount in the plan. After two years of implementation, it became evident that the administrative burden of the annual performance clearance exercise, particularly the need to justify each unit amount deviation, was not proportionate to the additional assurance on CAP expenditure provided. Its discontinuation was therefore

proposed in the 2025 CAP simplification package⁷, without affecting the Union's ability to ensure effective budgetary supervision and assurance.

4- Some deviations from milestones due to the start of the implementation but no corrective actions required yet

Based on the 2024 performance report, in 2025 the Commission carried out the first biennial performance review⁸, taking into consideration a selection of 22 result indicators. **All performance reports showed deviations above 35% for one or more result indicators.** These were mostly linked to rural development interventions: knowledge and innovation, investments in farm modernisation, better supply chain organisation and afforested land. Member States' justifications mainly related to delays in setting up the new framework and to the use of the remaining financial envelopes of the 2014-2022 rural development programmes financing similar measures. According to Member States, most of these difficulties will be addressed in the medium term and should not have an impact on the final targets.

The deviations were discussed with each Member State during their individual annual review meeting. As the justifications presented and the remedial actions envisaged seemed sufficient to address them, no action plan was requested by the Commission. It can be expected that the delays, and the resulting gaps between the actual and the planned values, can be recovered in the coming years. The situation will be reviewed again in the 2025 performance reports.

5- Adaptation of the planned financial envelopes to actual uptake

Member States have the possibility to reallocate unspent amounts from one intervention to another intervention under certain conditions. In financial year 2024, they used this possibility particularly for direct payments. The eco-scheme was a novelty, and some Member States had difficulties spending their planned amounts. On top of this, the eco-scheme is a ring-fenced budgeted intervention and the margin for offsetting amounts against those for other interventions remained limited. Eco-schemes that had underperformed were reviewed or better advertised to potential beneficiaries. The current state of expenditure for 2025 shows a much-improved situation with marked over-execution for eco-schemes. The redistributive payment and the complement for young farmers became the destination for some of the unspent amounts. Basic income support was well executed compared to the previous programming period.

6- CAP plans are living documents

Amendments of plans are a necessary feature of any programming process, as they provide the flexibility needed to address difficulties encountered on the ground and emerging needs.

⁷ Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2021/2115 as regards the conditionality system, types of intervention in the form of direct payment, types of intervention in certain sectors and rural development and annual performance reports and Regulation (EU) 2021/2116 as regards data and interoperability governance, suspensions of payments annual performance clearance and controls and penalties, COM/2025/236 final.

⁸ Every two years the Commission verifies that the planned targets values (milestones) are going in the direction of the planned values of result indicators. A deviation of more than 35% in the first year, and of 25% later on, should be justified. Corrective actions might be requested by the Commission if the justifications provided are not convincing enough.

Up to September 2025, 93 amendments had been requested by Member States. All plans were amended between 2 and 5 times from their approval to September 2025. Changes reflect changing economic circumstances, the need to make interventions more attractive, or to simplify. Through amendments, 34% of the targets were changed, with significant variations among plans. The targets most often increased concern social objectives because of the need to align them with the LEADER⁹ strategies in question after the approval of plans. Overall, the modifications were balanced between target increases and target decreases, including for green architecture targets. In its assessment of the amendments, the Commission ensured consistency, as well as maintenance of a level playing field, while considering specific national challenges.

In 2025, the Commission proposed to further simplify the process of amending the plans by limiting formal amendment requests to strategic changes only, which would make it possible for the plans to be amended more quickly. The proposal referred to as Omnibus 3¹⁰ has been adopted and will apply in 2026.

7- A new assurance model and single audit principle

Under the new delivery model, assurance is based on the proper functioning of Member States' governance systems. The eligibility of expenditure is ensured by the paying agencies and verified annually by the certification bodies. Certification bodies provide opinions on the annual accounts, on the effectiveness of the governance systems, and on the reliability of performance reporting. The Commission conducts risk-based audits primarily of their work and, only when it is not satisfactory, of the paying agencies themselves.

The reinforcement of the single audit principle is a key feature of the reform. While it increases efficiency, strengthens accountability at national level and avoids overlapping controls, it also makes the assurance more dependent on timely and reliable work of certification bodies. The Commission maintains regular contacts with paying agencies and certification bodies to ensure a common understanding and the consistent fulfilment of assurance requirements. If the Commission detects serious deficiencies in the governance systems, conformity procedures are launched and, if the deficiencies are confirmed, lead to financial corrections.

Between 1 January 2024 and 30 September 2025, the Commission carried out 78 audits of governance systems as a whole or of selected CAP interventions. In some cases, potential serious deficiencies were identified, and conformity procedures were launched to assess possible risks to the EU budget. As these take time, no conformity procedure had been finalised by the end of September 2025.

8- A new preventive approach with the area monitoring system

Under the new delivery model, the responsibility for designing and implementing controls in the integrated administration and control system was largely shifted to Member States.

⁹ LEADER: Links between activities or actions for the development of the rural economy

¹⁰ Regulation (EU) 2025/2649 of the European Parliament and of the Council of 19 December 2025 amending Regulation (EU) 2021/2115 as regards the conditionality system, types of intervention in the form of direct payment, types of intervention in certain sectors and rural development and annual performance reports and Regulation (EU) 2021/2116 as regards suspensions of payments, annual performance clearance and controls and penalties (OJ L, 2025/2649, 31.12.2025, ELI: <http://data.europa.eu/eli/reg/2025/2649/oj>).

The introduction of the area monitoring system obliges them to monitor by satellite imagery the fulfilment of eligibility conditions by farmers, when technically possible. Such monitoring replaces on-the-spot controls, thereby greatly alleviating the administrative burden. The preventive approach of the area monitoring system also makes it possible for farmers to correct their CAP applications without being penalised. In claim year 2023, this resulted in corrections for 3.3 million of hectares (2% of EU utilised agricultural area, UAA), helping to reduce penalties and alleviate the administrative burden for farmers and administrations.

However, the Member States and farmers could reap even more benefits from the use of the area monitoring system by making more interventions and eligibility conditions monitorable in the plans in order to support this preventive approach.

C. Better and comprehensive performance monitoring

The performance framework makes it possible to monitor progress in implementation and paves the way for a process of continuous improvement.

The framework integrates reporting on direct payments, rural development, and sectoral interventions into the same set of result indicators, according to their purpose. It establishes an exhaustive list of performance indicators. Each intervention is linked to one output indicator and to all relevant result indicators¹¹, to ensure a comprehensive depiction of CAP contributions.

The integration of reporting for both policy monitoring and assurance in the annual performance report has streamlined processes and increased consistency. However, it has also led to more complex calculation rules (partial outputs) and difficult aggregations (the proliferation of units of measurement). Managing authorities had trouble meeting the 15 February deadline for the annual performance report and providing all the certified data and necessary justifications, while for the purpose of monitoring, data availability was delayed.

The current result indicators are based mostly on action coverage because it is difficult to measure direct policy outcomes. However, the Commission has developed rough estimates for climate mitigation and soil organic content to be able to propose result indicators measuring outcomes for 2028-2034.

Member States need to evaluate the contribution of their plans to the achievement of all objectives during the programming period and have more freedom to design their evaluation plans. Supported by the Commission and the EU CAP Network, most of them have drawn up ambitious evaluation plans.

D. A major simplification effort

Experience with the implementation of the plans has highlighted the need for targeted adjustments of certain aspects of the CAP framework to alleviate the administrative burden for farmers and administrations. To this end, two packages of legislative and non-legislative actions were produced in 2024 and 2025 to increase the flexibility, proportionality, and clarity of CAP-related rules (such as those on *force majeure*).

¹¹ Interventions must be linked to all result indicators to which they contribute directly and significantly.

On the one hand, several changes increase flexibility in the way farmers manage land under CAP support instruments and to better align with on-farm realities (adjustments to conditionality rules). On the other hand, some changes streamline the implementation of the CAP plans for national authorities (amendments, the discontinuation of performance clearance).

The Commission also published a roadmap of further simplification actions to be taken throughout 2025, outlining planned actions, tools, and an indicative timeline for further improvements of CAP secondary legislation.

II. CONTRIBUTION OF THE CAP STRATEGIC PLANS TO ACHIEVING THE EU'S ENVIRONMENTAL AND CLIMATE-RELATED COMMITMENTS

The environmental and climate-related objectives of the CAP are tackling climate change, protecting natural resources, and enhancing biodiversity. The 2023-2027 CAP introduced a policy mix of interventions, conditionality, and a ring-fenced budget (the CAP's green architecture) to achieve these objectives. Member States drew up environmental strategies to contribute to EU legislative acts on the environment and climate, and help reach the EU's Green Deal targets, and to fulfil the obligation¹² to make a greater overall contribution to the achievement of those specific objectives compared to the period 2014-2022.

Each Member State chose its own policy mix to design its green architecture. The area-based interventions are supplemented by support for green investments, cooperation, or training projects. The current CAP continues to support management commitments and investment, well known by farmers and adapted to their needs. On good agricultural and environmental conditions (GAEC), some adjustments were introduced in 2024 to make implementation more adapted to the realities of farming: targeted exemptions, temporary derogations, and the obligation to reward the maintenance and creation of non-productive areas.

New in 2023, eco-schemes make it possible to scale up agro-environmental actions with a dedicated large budget and annual commitments. Some Member States focused on getting many farmers involved in a small and incremental, but widespread, change in farming practices, while others designed more targeted interventions. All Member States had to strike the right balance between the level of the premium and ambition to ensure the attractiveness of the scheme. In most plans, the eco-scheme was more subscribed to than anticipated, while in a few other changes were necessary to adapt interventions and support their uptake by farmers. **At EU level, 47% of farmers received eco-scheme support in financial year 2024, for 58% of UAA.**

After two years of implementation, it is too early to measure the real impacts of the interventions on the achievement of the environmental and climate-related objectives in the CAP plans. In many cases, impacts can be measured only after several years (e.g., biodiversity regeneration, air and water pollution, soil health, etc.) However, three recent studies help estimate and quantify the potential contributions of the planned interventions to the achievement of these objectives. The studies assessed each CAP intervention based on (i) the farming practices (or requirements) supported, (ii) the planned coverage, and (iii) the impact of each farming practice on climate, biodiversity, clean air and soil health.

¹² Article 105 of Regulation (EU) 2021/2115.

The study on ‘Budget tracking of the CAP contribution to climate change, biodiversity and clean air action’¹³ shows that **33% of the CAP budget makes a positive contribution to climate, 39% to biodiversity and 20% to clean air.** In addition, the study shows that several interventions contribute and not only those belonging to the green architecture interventions. This approach considers the definitions of interventions and the targeting of support¹⁴, and results in a slightly lower, yet comparable, contribution to climate than when using Rio markers¹⁵. This proves the relevance of the Rio markers, a simplified approach which is needed at planning phase. These budget tracking methodologies only assess positive impacts, this should be kept in mind when interpreting the results, which should be complemented by ex-post evaluations.

The CAP plans represent a significant potential contribution to reaching the 2030 climate mitigation targets. The study on ‘Rough estimate of the climate change mitigation potential of the plans’¹⁶ indicates a potential positive contribution of the 28 plans to greenhouse gas emission reductions and enhanced removals of 35 million tonnes of CO₂ equivalent per year on average over the period 2023-2027, distributed between 5 million tonnes of non-CO₂ emission reduction and 30 million tonnes of carbon removals per year. This estimation comes with uncertainties, in particular, the extent to which the annual positive contribution can be cumulated until 2027 strongly depends on the additionality of the actual uptake of practices by farmers throughout the period.

Member States have developed **a wide range of interventions to improve soil health that contribute to the achievement of all three specific objectives.** The study ‘Rough estimate of the soil protection potential of the CAP’¹⁷ examines the implementation choices of 13 plans representing EU pedoclimatic diversity where soil protection is identified as a priority. It assesses six soil characteristics. For example, the potential increase in agricultural soil organic carbon content is estimated at 0.92% per year for CAP interventions and at 0.14% per year for GAEC requirements. Crop rotation and diversification account for most of the estimated potential increase in soil organic content. This is a preliminary outcome, still ‘rough’ due to some limitations, mainly the difficulty of accounting for the local context, and it doesn’t cover all aspects of soil health (e.g. salinization, subsoil compaction...).

The studies mentioned above estimate CAP contributions based on the planned actions, so they cannot prejudge the final outcomes. However, the implementation of the plans shows that **on EU average most environmental and climate-related annual milestones were surpassed in 2024**¹⁸. In particular, interventions to improve and protect soil cover 51% of EU UAA and actions to enhance carbon storage in soil and biomass cover 35% of UAA, which augurs well for the future.

On the EU Green Deal targets, some positive trends can be observed even if it is too early to assess the contribution of the CAP.

¹³ See reference 3 and table 4 in accompanying Staff Working Document.

¹⁴ The tracking methodology applied in the study is significantly more scientific-based and more granular than the current climate tracking methodology and therefore is expected to yield more precise results.

¹⁵ Rio Markers are qualitative indicators developed by the OECD to help donor countries and development agencies track how much development aid supports environmental goals under the objectives of the Rio Conventions, such as biodiversity, desertification, and climate change (mitigation & adaptation).

¹⁶ See reference 4 in accompanying Staff Working Document.

¹⁷ See reference 5 in accompanying Staff Working Document.

¹⁸ See reference 8 in accompanying Staff Working Document.

In 2023, **11% of UAA was farmed organically**, 6% of UAA was supported with specific area-based organic support. However, some Member States said they had difficulties reaching their target for organically farmed land due to lower demand than expected for organic products and rising costs. They planned remedial actions, but the target of 25% of farmland's being organic can only be reached with a strong increase also on the demand side for organic products.

The EU Green Deal target of a 50% reduction in **nutrient losses**, while ensuring no deterioration in soil fertility, is linked to a reduction in the use of fertilisers by at least 20% by 2030 compared to the 2012-2014 average. Almost all plans support more balanced fertilisation and better practices, for example by banning synthetic fertilisers or their substitution with organic fertilisers, precision farming, and other practices to limit air and water nutrient losses. Sustainable nutrient management practices were implemented on 14% of EU UAA in financial year 2024. On average between 2021 and 2023, farmers across the EU used 8.9 million tonnes of nitrogen fertilisers, 9% less than between 2012 and 2014 (reference period). Since the recent decline is partly due to the high cost of synthetic nitrogen fertilisers, subsequent to the ongoing war in Ukraine, it is too early to assess its impact in terms of reaching this ambitious target.

The EU Green Deal target for **antimicrobials** is to achieve a 50% reduction in sales for farmed animals and aquaculture by 2030, compared to 2018 levels. The European Medicines Agency (EMA) announced a drop of 25% in overall sales of antimicrobials for use in food-producing animals in the EU between 2018 and 2023¹⁹, bringing the EU closer to reaching the 2030 reduction target.

A lot has been done to make the use of **pesticides** more sustainable and to reduce their use, with relevant practices covering 29% of EU UAA in financial year 2024, mainly through agri-environment-climate commitments and support for organic farming. Crop rotation and buffer strips play an important role in the reduction of the use of pesticides. However, it is too early to judge the extent to which CAP interventions contribute to reaching the EU Green Deal targets (50% reduction in the overall use and risk of chemical pesticides, and in the use of most hazardous pesticides compared to 2015-2017).

At EU level, **landscape features** covered 5.6% of agricultural land in 2022²⁰ and fallow land 3.6 % in 2020, so both will contribute to reaching the target of 10% of agricultural area as high diversity landscape features. The interventions supporting landscape features in the CAP plans are generally broader and aim to enhance biodiversity, habitats and species through greater structural diversity. The relevant annual milestone has been reached in most plans, with 1.5% of EU UAA covered by support for managing landscape features in financial year 2024. From 2025, due to the costs for farmers of fulfilling it, the obligation to keep a minimum share of arable area for landscape features and fallow under GAEC 8 has been replaced by the obligation for Member States to propose an equivalent eco-scheme supporting the maintenance and establishment of new landscape features.

¹⁹ See reference 6 in accompanying Staff Working Document

²⁰ See reference 7 in accompanying Staff Working Document

CONCLUSION

The novelty of the new delivery model lies in its integrating instruments more strategically, the greater flexibility it affords Member States to adapt the design of interventions to their needs. Strategic programming based on needs assessment was welcomed by Member States and beneficiaries and the new delivery model has had a positive impact on the governance of the CAP (partnership, use of evidence). The introduction of the area monitoring system also provides opportunities to alleviate the administrative burden for farmers and administrations.

However, the late adoption of the Union legal framework did complicate matters for Member States, and they have pointed out the importance of receiving information in time to enable an integrated and coordinated approach of the CAP toolbox and avoid gold plating. Not all flexibilities were used, including for Member States to simplify rules, to avoid the risk of financial corrections.

Unnecessary complexities were also addressed by two simplification proposals tabled by the Commission in March 2024 and May 2025, making notably provision for (i) the replacement of the obligation to keep a minimum share of arable area for landscape features and fallow by an equivalent and voluntary eco-scheme for farmers and (ii) the discontinuation of the annual performance clearance exercise.

Experience has shown that Member States managed to correct or adapt the plans by means of amendments. To facilitate further amendments, a notification procedure for non-strategic amendments has been introduced. An appropriate balance needs to be struck between simplifying planning and reporting and the level of information needed to assess compliance with EU law and the contribution of the plans to the CAP's specific objectives, and between the adaptability of plans and both a focus on performance throughout the programming period and providing certainty to farmers.

Following the first biannual performance review, the Commission concluded that the implementation of the plans was on track, with deviations remaining within the boundaries set by Article 135 of Regulation (EU) 2021/2115. None of the plans require corrective actions.

The analysis confirms that the plans have the potential to contribute to the achievement of the environmental and climate-related objectives of the CAP. CAP plans' implementation shows that on EU average most environmental and climate-related annual result indicator milestones were surpassed in 2024. However, the quantification of the CAP plans' contribution to reaching environmental and climate objectives requires a longer period of assessment and consideration of the impact of other relevant factors.

All of the above was taken into consideration, when preparing the proposals for the multiannual financial framework and the CAP 2028-2034.