

Informal comments of the European Commission to CAP strategic plan - Czechia (version 14/10/2021)

No	U	CH	SEC	COMMENT
1	B2	5	5.3.38	• A link between the outcomes of CZ or other OGs is missing as input for the advisors. Similarly, there is no trace of the use of outcomes of multi-actor Horizon projects as input for the knowledge and innovation of advisors. • Can non-certified advisory bodies profit from CAP support under this measure? • How many certified advisory bodies do you expect? How will they be selected? Should they all have their separate websites? Why not centralise this in one publicly managed website where farmers can find all advisors and their competence, expertise and specialisation? • A central publicly funded back-office (= specialist advisors who can help their colleagues working in the field with specialist knowledge and connections to the researchers and CAP networks, Art 102) seems not to be foreseen, although it is the basis for connecting AKIS actors and sharing knowledge publicly. Such a back-office is going beyond what the innovation strand of the CAP network is planning (database of the CAP supported innovative project), which is already good. However, a back-office with specialist advisors goes much further in interconnecting and publishing and should be systematically covering all themes and knowledge to be shared
2	B2	5	5.3.38	• More sharing of expertise and knowledge and more transparency on advisors and would be needed and quantified. • It is unclear why innovation support for EIP OGs is called a “project” (point 3). Please clarify. Please also explain if this “project” will mean that a person with an individual innovative idea will be accompanied to a potential EIP OG, and how this will be done. Indicate which actions exactly this will include • In the introduction, “taking part in traineeships abroad” is mentioned. I could not find to which specific point 1-6 this relates, nor how it will be organised (which topics, who can benefit from these visits, etc) • A number of potential AKIS activities related to integrating advisors in the AKIS have not been taken up. For instance, in a well-functioning AKIS, we would expect advisors to take up further roles, for instance in multi-actor thematic networks including different AKIS actors which are collecting the latest knowledge and innovation and producing ready to use materials (for farmers, for foresters, for advisors, for education etc). Another typical event advisors could manage are on-farm demonstrations of novel types of practices (e.g. more environmental/climate friendly practices, ecoschemes etc). Please check also the other potential activities to integrate farmers in the AKIS tool (see also dedicated annex) and explain the choices made or add what is missing.
3	B2	5	5.3.38	• It seems as if the certified advisory bodies take over the role of the AKIS coordination body to organise advice in the

				country, while excluding some (or many?) advisors. Overall when reading details on the “certification”, it seems counterproductive • In a well-functioning AKIS ALL advisors are included. In the 5.3.38 fiche this is not clarified, on the contrary: why only “managed” advisory “bodies” can be certified (see info sent in August), could that also be a one-man company giving advice? See Art 5 of the info sent, which is not fully clear, e.g. on measuring process performance, determine sequences and interlinkages, identify inputs and outputs, and “necessary resources”. Art 8 is even very far going. Please be aware that good advice is quite difficult in terms of predicting the time to be spent, the amount of services to be delivered per year. We do not want to push advice for which no demand exists or which is not asked for. How should such “management” look like, what does it include as a minimum? Note that it is not necessary that each and every advisor covers all the fields. There are no EU level conditions on education and experience, nor on minimum capacity or permanent premises, so why demand it, when it probably will have as effect that a number of smaller organisations or one-man trusted advisors will be excluded? It seems as if the old system as under RDP 2014-2020 is just taken over, without thorough reflection and with the effect to be expected that not ALL advisors will be integrated within the AKIS, in particularly not the most trusted ones with most effect on farmers’ behaviour. • Would e.g. short supply chain or social innovation advice be given? Impartial advice on digitalisation? This is not clear from the description in 5.3.38 • Please specify how much training hours per advisor per year are foreseen and on which subjects? Will interactive skills development be covered? • How will it be ensured that the advice given stays confidential given the foreseen document management system? • It would be useful to exchange with other MS on how they organise their advisory measure and advisory measure in a more flexible way. For instance “examining the customer’s request before processing an offer” seems rather administrative burdensome. Also doing a risk analysis may be burdensome. A tendering system is to be avoided, as the 2014-2020 period illustrated.
4	B2	5	5.3.38	Aid intensity: 1) personalized advice: max 2000 euro per service? Please clarify what is a service: is it several visits of a farmer, or is it per visit, per year? Please clarify also for the other types of advice what exactly is paid and how the maximums are calculated, to which precise services do they relate • Please also clarify section ‘planned amount’ for : 60% alternatively 35%. How is this calculated? • Overall the ranges between minimum and max rates seem very broad (e.g. from 150 to 1500 euro). Could you – for each type of activity 1-6 clarify what are the reasons behind please? • Please provide the total amount (as done under 5.3.39)and expected number of farmers which will benefit from each of

				the 6 actions.
5	B2	5	5.3.39	- Why is this intervention only the classical training? What about on-farm demonstrations, e-learning, farm exchanges, etc (see AKIS tool) - It is unclear how the training bodies/trainers (??) will be selected, please clarify if any minimum conditions will apply
6	B2	5	5.3.40	- Please clarify if advisors are only innovation brokers or if they will also help implementing the project? How is the dissemination and communication of projects done? Our experience from a study shows that for many OGs the communication is insufficient, not professional, not including enough farmers, not regular enough. How will all advisors benefit from the outcomes? Who will organise this? Will it be an obligation to have advisors involved in each project? They are perfect multipliers and have further assets very useful for OGs: knowing practice needs and practical context, facilitation skills, high potential for communication to their other clients etc Will OGs be used as a testbed for future CAP measures? How will OGs be informed on similar OGs in other countries, covering the same theme/challenge/opportunity? Why should OGs be linked to (technology) investments? Most innovative subjects do not require investments Please clarify more in detail how brokering and innovation support will be handled (who , how, which funding etc). - Will there be 1st step funding for preparation of OGs? OGs without researchers should be made possible. For a number of innovations this is necessary (e.g. social innovation, rural areas, generational renewal, short supply chains etc)
7	B2	5	5.3.40	Aid for farmers' investment during the OG period should be paid pro-rata, the rest of the cost of the investment should be carried by the farmer himself (e.g. machinery works 20 years, OG project only 5 years => 75% of the investment must be financed outside the project budget). Also, innovation support should follow the rules and support rates of the investment intervention, so not 100% Will farmers and advisors be paid for their work within the OG project? Please specify this in the fiche Financial data seem to be underestimating the number of potential projects according to the 9 specific objectives, including the effect of individual innovation support and integration in the AKIS (only 10 OGs per year) Will there be a continuously open call for OGs? See Sweden example with 3 cut-off dates per year Will there be smaller and bigger type of OGs to cover for the variety of demand? This seems not yet to be the case. Eg generational renewal 5000 euro could be enough to help reshape a farm for the future, e.g. farmers' clusters exchanging knowledge helped by a facilitator could be funded with less than 50.000 euro The total number of OGs seems quite low. Compare: 300 OGs in small countries like NL

				• Missing interlinkage with Horizon Europe projects: how will this be encouraged? • The intervention misses the obligation to report to the EU level EIP network
8	B2	8	8.1.1	• Please make the interventions more coherent with section 8, e.g. take over parts from section 8.1 into 8.3.38 to 40. • A number of contradictions or missing elements in this part 8 when comparing 5.3.38, e.g. on certification and coverage of ALL advisors. See remarks above under 5.3.38. Also on demonstration, there is no trace in 5.3.39. The training on soft skills for advisors is not mentioned under 5.3.38. Simplified reporting on training is not explained in 5.3.39. Coaching to improve cooperation between research and practice: where is this mentioned under the interventions? “supporting EIP projects that build on the results of Horizon Europe international research projects (e.g. by granting preferential criteria to such projects).” is not mentioned in 5.3.40. Nor do I see in any intervention “The newly established AKIS Coordinating Body of the MoA will also play a key role, including by promoting links between the AKIS actors. The activities of the AKIS Coordinating Body will complement the activities of the CAP Network. Cooperation between research-advisors-farmers will be deepened through various thematic events, round tables, workshops, discussion fora that will help, inter alia, to define areas of research needs.” • Why should innovation brokers always be linked to research? The text mentions social innovation, organisational innovation: are researchers needed to develop such innovations? • Why is a “selection” of innovation brokers needed? • The role of researchers in the AKIS is missing: they should be sharing their practical information to farmers and advisors and listening to farmers/foresters’ needs for innovative research. This knowledge sharing should not only be unilateral (“training”) • Which structured and regular exchanges between the main AKIS actors are foreseen? How will they be supported? (last bullet) Transparency on public website of UZEI’s register of certified advisors? Is it foreseen? Specify the content please
9	B2	8	8.1.2	• Why is the following helping AKIS integration: “<i>Participation in the supported advisory projects will create new or strengthened links between the administration and advisory bodies (also one of the objectives of the certification of advisory bodies), as well as between advisory bodies and accredited and non-accredited consultants</i>”? • Who will take care of “Strengthening the flows between research, advisory system and AKIS links will also be supported through the creation of a repository for outputs of scientific and research and other projects and initiatives (reports, methodologies, articles, videos, photo, link to useful links) for better access to information. The repository will thus also support cooperation between AKIS actors, to which the activities of the CAP Network will also contribute”. It is not mentioned in the interventions. • Role of CAP networks for sharing information should not mainly be the website (last paragraph). Face-to-face events

				where people meet are key and important part of the CAP network tasks. • “Overview of expected innovation support activities”: those activities are not mentioned in the intervention 5.8.40
10	B2	8	8.1.3	• Why is the 2nd pool of independent consultants not accredited? How to better integrate these in the whole AKIS? Note that all advisors must be trained, not only the accredited ones. Experience and expertise should not be a precondition for support • Please rethink the admin burden caused by the certification. What extra does it bring that the market would not rule? Efforts could be better targeted than this. Each farm and farmer are different and there is no one size fits all, so why all this work to certify and mainstream advice? Intensifying training for each impartial advisor and ensuring his/her access to public knowledge is key and much more important to put efforts on according to the new CAP support rules How will the AKIS coordinating body ensure advice on all advisory fields is available?
11	B2	8	8.1.4	• We agree that <i>“Another important aspect of innovation support will be to create a space for brokers (platforms, working groups, workshops) to help them share experiences and learn from each other.”</i> However, where in the intervention 5.3.38 do we see this? Indeed other MS organise 2 times per year a meeting with all innovation brokers, including an interesting visit and discussions on their work. This works very well and is funded by the CAP network in that case. • You could describe the above as a task under 4.5 Again, we agree that <i>“Brokers should help farmers, food workers or foresters in particular to find partners and start projects. They can, however, continue to act as facilitators in the operational group. This will thus pave the way for brokers to form networks, possibly thematic groups, and to develop work on topics that may have an innovative potential.”</i> However, where in the intervention 5.3.38 do we see this?
12	B2	4	4.5	• The description of the tasks of the CAP network for innovation is limited. As a minimum, <u>all</u> elements mentioned in section 8 should be summarised here • Furthermore, please look into the AKIS tool for more initiatives to be taken All info from the EIP-AGRI (Back-office, see above) is a perfect input for the thematic working groups, as set out in 4.5.2,
13	B2	5	5.3.38-5.3.40	Please count the budget for interventions related to the AKIS strategic approach, in Euro and as a % of the RD planned budget, as you do in this RD period under section 11.1 (the budget should be counted as impact indicator later on, so need to know if sufficient funding is foreseen overall for K&I)
14	B2	2	2.1.10	SWOT analysis and needs assessment and intervention strategy does not cover digitalisation in agriculture and rural areas
15	B2	8	8.1.5	It is good that reference to non-CAP instruments is made; please, note that more EU level instruments are likely to be relevant in this context (e.g. RRF and CEF and DEP). However, the strategy is to expected to elaborated how CAP measures

				contribute to boost digitalisation in agriculture and rural areas, and how digitalisation contributes to achieve objectives of the CCO and other SOs. The Strategy is to build upon the results of the SWOT analysis and needs assessment for the CCO and the SOs. It is proposed to have a look at the toolkit supporting the elaboration of the digitalisation strategy
16	B2	8	8.1.6	Still to be elaborated; please note, that Section 8.1.5 and 8.1.6 will be merged
17	B4	5	5.3.19	The perspective taken in the CAP NSP is that the further expansion of organic production can contribute to the achievement of a number of specific objectives. However, though reference is made to a national organic action plan, the CAP NSP itself does not provide any information on the strengths, weaknesses, opportunities, threats and needs specifically of the organic sector. With the exception of some data in some of the annexes, there is no consolidated comprehensive value chain analysis covering not only the current state of organic farming but also (expected developments in) processing capabilities, wholesale and retail capabilities, final consumer demand, etc. and their interrelations. Disregarding these issues and investing only in organic farming may risk creating value chain imbalances/bottlenecks down the line.
18	B4	5	5.3.19	The CAP NSP mentions a target of 21% of the agricultural area under organic farming by 2027. However, it is not clear how this target has been defined, how it relates to recent trends in the area under organic farming, recent developments in the organic sector, the SWOT and needs analysis, etc.
19	B4	5	5.3.19 5.3.22	Reference is made to organic farming under schemes 5.3.19 and 5.3.22. However, there is no analysis of whether these two tools will suffice to achieve the 21% target. In addition, there is a lack of clarity on eligibility conditions (e.g. 5.3.19 “possible to combine with conventional farming”?) and the basis for the calculation of rates.
20	B4	5	5.3.19	It seems that there is no plans to provide technical support to the organic farmers (lack of expertise has been identified as a weakness), or take the advantage of the higher priced organic products to support low farm incomes (the CZ farm income is only half of the EU average) or boost the quality of the agricultural products (the poor quality of the agricultural produce is mentioned in the report).
21	B4	5	5.2.10	In its overview of sectorial interventions, there is no mention of organic production except for potatoes (ecological packaging and organic production). However, the CZ report states the following; “The growth in the added value of agricultural production needs to be based on quality products and innovation. This can ensure a focus on unique production, targeting a specific group of consumers.” Surprisingly, nothing is said about measures to increase the demand on organic products, which could fulfil all these needs. When talking to increase the commercial value the plan does not mention organic products, but it refers to the products of the Protected geographical Indication and Protected Designation of Origin.
22	C1	2	2.1.4.2	Increase agriculture’s resilience to climate change – there is no mention about the resilience to and risks of new/ more pests/ diseases/ weeds. This should be added, especially according to recommendations - that within the last 3 years substantial bark beetle calamity has caused increased logging which causes increased emissions in LULUCF sector especially after 2017 when forest land category switched from net removal to net emitter.

23	C1	2	2.1.4.2	Reduction of GHG and ammonia emissions from agriculture (and increasing removals) – The need to increase removals should be included. According to recommendations - there was a dramatic decrease in CO2 removals from forests in the land use, land use change and forestry (LULUCF) sector (in 2018, forests even emitted more CO2 than they absorbed).
24	C1	2	2.1.4.2	Within intervention strategy lack of reduction of CH4 emissions from livestock or manure management has been detected as well as lack of information about N2O reductions from fertilisers. Note that SWOT of SO4 identified under weakness W3 – enteric fermentation, W4 manure management and W5 agricultural soil as source of CH4 emissions. But there is no intervention in livestock/manure management.
25	C2	2	2.1.1.1	SWOT analysis is missing some important elements for future competitiveness – adoption and use of new technologies for an increased competitiveness, both for the monitoring of production conditions (e.g. satellites, could be mentioned in cross-cutting SO) as well as for a further automatization of the production (this one could be mentioned SO1 or SO2). In SO1, these could be linked to new labour market conditions, referred briefly (but not clearly) under Opportunities (last bullet point). There, it is not clear what changes in labour market are supposed to stimulate an interest in agricultural science and future career paths. An emphasis on new skills and the need for a more qualified labour would need a better explanation.
26	C2	2	2.1.2.1	In SWOT analysis, strengths on wine could be better grouped and in some cases, some repetition is observed (an increasing interest in wine is supposedly explained by an increasing consumption and the wine tourism). The increasing wine consumption should be better elaborated, not giving an impression of any future rising concerns about the wine consumption. Also the production of quality wine is related to an increasing consumption of that category of wine. So some bullets could be reduced there. In addition, alternative food networks could be highlighted as a strength of Czech food market I believe. You have something mentioned as a weakness there (not enough utilizing the potential of local networks) but this could be more a regional problem than national so some explanation might be useful. How do you define low capacity? (e.g. measured by the share on total sales in a given region?) It seems that last 4 bullet points in Weaknesses refer to wine (e.g. low self-sufficiency), however, this is not clear without reading the full list. This would deserve some clarification. Opportunities concerning wine are not well-elaborated, and not targeted. This would deserve some further attention (e.g. higher support for R&D targets wine I suppose, as well as a high interest of consumers in national production; however, this should be specified). “Lower share of effectively innovating businesses compared to abroad” – how do you compare this? The size could be an issue as in some other EU countries; the higher potential is linked to a bigger and more diversified market, with some centralized R&D. “Pressure of local networks on wine price” – shouldn’t it be rather turned in a low level of sectorial concentration and the low bargaining power in relation to supermarkets/etc?

27	C2	2	2.1.3.1	Weakness – how do you mean “missing quality regime in vertical chain”? It is mentioned elsewhere that the quality label is well recognized, and in Strength even mentioned that there is an experience with that label. Last bullet on Weaknesses – what common projects are you referring to? It would be better to mention common innovations (both products’ and processes). Threat – it is not clear why a dense retail network should be considered a threat, doesn’t it imply availability of shops?
28	C2	2	2.1.3.2	It’s not clear why quality production is not supported in the Strategic Plan, given an emphasis on it also in other parts. With all uncertainties linked to weather, climate and price fluctuations, the value (and income) generated through that could be of a benefit to the sector. Is there any national programme instead?
29	C2	2	2.1.3.4	Result indicators should be better targeted to the most supported sector – laying hens, for which the allocation of the envelope is around 90%, and there is no mentioning in the indicators’ description.
30	C2	2	2.1.3.5	Will laying hens, potatoes and flower be the only sectors supported? Will the existing POs remain without the support? If it’s the case that you’re assuming their economic viability without the support, this could be justified somewhere, mentioning that the challenge/threat remains in the ones identified for the support.
31	C2	2	2.3	Targeted values of indicators refer to chapter 2.3. is missing in the document.
32	C2	2	2.1.7.2	How the issue of access to land (in addition to providing resources to buy the land) will be dealt with in relation to young farmers?
33	C2	2	2.1.9.1	As SO9 concerns sustainable food consumption, how would possibly food waste and losses be treated in the Czech Strategies Plan?
34	C2	5	5.1.6-15	How the payments for coupled income support will be modulated to account for different production conditions, in particular targeting production in marginal areas of higher costs? (especially in animal sectors)
35	C4	2	2.1	<u>Intervention strategy</u> There is no result indicator on digitalisation (R.3), does it mean that none of the interventions will address this need? There is no result indicator on renewable energy (R.15), does it mean that investments will not be used to increase the capacity of production of renewable energy? There is no result indicator on risk management (R.5), while several interventions under sectoral programmes address risk management and crisis prevention. Social inclusion: there is no result indicator on social inclusion (R.42), does it mean that none of the interventions will address this need? The indicator R.19 as described in the document (covering soil, air and water) does not exist. The link of the environmental interventions to soil (R.19), water quality (R.21), water use (R.23), nutrient management (R.22), air (R.20) The objective of reduced pesticides use is now under SO5, not anymore under SO9.
36	C4	5	5.1.4	<u>Eco-scheme:</u>

			5.1.5	Note that all the links between grazing/permanent grassland and objectives noted in the list published factsheet-agri-practices-under-ecoscheme_en.pdf (europa.eu) . For the eco-scheme covering different land types, the links to relevant result indicators could be established by land type (as they might differ according to the land type/practise), that would ease the reporting afterwards.
37	C4	5	5.2	<u>Sectoral interventions managed via operational programme</u> Only the links to R.10 and R.11 are established while the other relevant links are missing.
38	C4	5	5.2.2	Vineyards are grown by farmers and are primary agriculture (thus R.9 OK), thus the link to R.27 (rural areas) is not relevant. Do we have a common understanding that the link to R.16 (CLIMA) would depend on the operation supported as not all reconversion will be linked to climate adaptation? Is there a specific element in the design of the intervention that would encourage the conversion/re-planting of more adapted varieties? Have you foreseen an either way to spot the relevant interventions to report accurately R.16?
39	C4	5	5.2.5	The training to beekeepers should not be linked to R.28, it belongs to the exceptions for which no link is to be established. In general, best to double check that interventions in the Apiculture sector designed under Article 55(1), points (a) and (c) to (g) (new numbering) are not linked to any RI. The others Apiculture interventions are linked to R.35 – Preserving Beehives.
40	C4	5	5.3.5	In view of the intervention description under cooperation, it seems more directly linked to knowledge exchange (R.1), while the link to R.9 is not established (missing element of investment).
41	C4	5	5.3.9	The investments supported seem designed for farmers and might also contribute to farm modernisation (R.9) In which case would you establish the link to R.27?
42	C4	5	5.3.10	Why linking afforestation to natural resources (R.26) only Climate action (R.16) is also addressed by afforestation
43	C4	5	5.3.12	Why linking agroforestry to natural resources (R.26) only? Agroforestry contributes to biodiversity (R.32) also.
44	C4	5	5.3.13	If this intervention relates to maintenance, without additional commitment, it should be linked to R.17 (as it corresponds to the maintenance support following the establishment).
45	C4	5	5.3.14	Restoration is to be reported under R.17 and the expenditure under R.18
46	C4	5	5.3.15	If this relates to investments in forest, the link to R.18 should be added.
47	C4	5	5.3.16	Add the expenditure in the forest sector in R.18
48	C4	5	5.3.17	The relevant RIs are missing
49	C4	5	5.3.18	The indicator R.19 mentioned here does not exist, see general comment above.
50	C4	5	5.3.19	The proper links of organic farming with all relevant RIs are to be established (soil, water, pesticides..) see “Cover note for output and result indicator fiches”, page 12 (<i>In addition, as demonstrated by the JRC, the intervention supporting organic farming should be linked to the following RIs: R.14 (carbon sequestration), R.19 (soil), R.21 (water quality), R.24 (pesticides), R.29 (organic farming); R.31 (habitat and species), R.32 (biodiversity), R.43 (AMR), R.44 (animal welfare). MS may also attribute organic farming to other RI when specific requirements or conditions of the intervention can justify it. On the</i>

				<i>contrary, some farming practices reducing ammonia emissions e.g. 'irrigation after fertilisation', 'specific amendments with sorbents' and 'no-urea fertilizers' should be linked only to one RI, that is R.20 (air quality))"</i>
51	C4	5	5.3.21	There is no link to R.14 while the very similar eco-scheme is linked to R.14, what is the rationale in both cases?
52	C4	5	5.3.22	Do you confirm that it is a commitment on top of organic farming, this is why it is not linked to R.29 (organic)?
53	D1	2	2.1.1.3	- The latest trilogue decisions introduced in article 96 an obligation to specifically address the needs in terms of fairer redistribution and more efficient targeting of the income support. This has to be added in chapter 2 (in the same text box as for the risk management). - Please also be more specific on the needs in terms of redistribution: For the time being the need P1.03 should be more specific on which size/territory/sector would need higher income support. - The SWOT summary for the Specific Objective 1 (SO1) does mention under "Weaknesses" difficulties undergone by the 'beef and veal' and 'sheep and goat' sectors (i.e. factors that would provide the rationale for granting CIS, for instance, below-the-average income). However, other sectors that are to benefit from CIS interventions are not mentioned at all. <i>W.4 - "Despite the high reliance to date on operating aid, undertakings specialising in ruminant farming, but also the pig and poultry sectors, are below average income."</i> We would suggest adding those elements under "Weakness", for example: - W.1. Particularly low farm income in several agricultural sectors <i>[particularly effected sectors are X, Y, Z]</i> - W.2. Significant decline in area size, economic size and standard (size) production for small and medium-sized farms <i>[particularly effected sectors are X, Y, Z]</i> - W.3. High and persistent dependency of agricultural income on direct payments <i>[particularly effected sectors are X, Y, Z]</i> - To note, the needs assessment, correctly, already specify those sectors that are in need of additional coupled support (see P1.02). Though this should also be exhaustive (i.e. beef&veal and dairy should be specifically covered instead of being merged under 'cattle').
54	D1	3	General	An overview of how the aim of fairer distribution and more effective and efficient targeting of income support is addressed ("redistributive strategy") as introduced in final stage of trilogue is missing. A simulation showing the combined effects of all relevant income support tools on income and direct payments is encouraged (e.g. using FADN), simulating all the relevant tools and all other things (structures and prices) considered equal. The analysis of effects by physical size should be included, as well as an analysis by group of territories if relevant. It would help to justify notably the choices made for the CRISS ranges.
55	D1	4	4.1	Agricultural activity:

				• Mushrooms are not part of Annex I to the TFEU – so it could not be regarded as agricultural activity. • No definition of maintenance criteria under the definition of ‘agricultural activity’ (MS have to further define it). • Not clear whether growing hemp varieties which meet requirements of the SPR (0,3 THC limit) is part of agricultural activity.
56	D1	4	4.1	Agricultural area: • Rules regarding landscape features, including trees, should be under the ‘eligible hectare’ part, not under ‘agricultural area’ definitions. • Information missing on the ‘agroforestry systems’. To clarify, MS should define elements of ‘agroforestry systems’ on ‘agricultural area’. To clarify, these systems form part of agricultural area under the SPR rules, as agreed by legislators. Thus MS cannot disregard them. • The definition of permanent crops, which should include the definitions of nurseries and short rotation coppice are missing.
57	D1	4	4.1	Eligible hectare: • Not clear how the predominance of agricultural activity is established. • No criteria defined how CZ will ensure that the land is at the disposal of the farmer. • At the same time it should be noted that CZ do not have to repeat the derogations of eligible hectare, like the inclusion of GAEC 9 protected features or areas used to attain minimum share under GAEC9. To recall, these derogations, as well as other derogations under the provision, such as areas afforested, set-aside under the Pillar II commitments, etc. – are by definition eligible (not a choice for MS). • Also, to note that differently from EFA under the current rules, under the SPR rules there is no possibility to have ‘adjacent’ LF.
58	D1	4	4.1	Active farmer: • Difficult to understand what is the definition of ‘active farmer’. A requirement to have 1 hectare of land or 1 livestock unit seems to rather reflect minimum requirements to receive direct payments. Thus, one may say that there is principally no definition of active farmer. • If registers are to be used to define the minimum level of agricultural activity, CZ should further explain it.
59	D1	4	4.1	Young farmer: • What are exactly those minimum agricultural qualifications laid down in the national implementing provision that the young farmer have to meet? Are those the same for all the farmers who want to be registered as farmers?
60	D1	4	4.1	Minimum requirements for receiving direct payments:

				- There must be some confusion here, since the threshold should relate to all direct payments, coupled payments could not be separated. E.g. it could be that CZ sets 1 ha as minimum area threshold and for those farmers, receiving animal-related support, who has not enough area, the threshold is 100 EUR. For CZ to confirm if this is the intention. - It should be explained how 1 ha threshold contributes to the objectives set out in Article 6(1) of the SPR. Further definitions: not clear why under this section conditions for interventions for Article 65 and Article 28 are included.
61	D1	5	5.1.1	BISS Eligibility: 'properly farmed', please adapt, this concept does not exist in SPR, did you mean agricultural activity/maintenance? Please provide justification of the unit amount (+ the justification of the min./max. which can be done together (meaning that 1 justification can cover the range of values: the unit amount and the min./max.)). Explaining the amount as the envelope divided by the number of hectares is not sufficient. The amount of aid per hectare should be explained based on the needs assessment (e.g. based on the difference between average farm income and average income for the rest of the economy), possibly in combination with budgetary constraints in relation to the available envelope. For that purpose, elements described in the introduction of the BISS intervention can be useful. Elements related to the controls 'pre-pricing and non-declared area should not be part of the description of this intervention;
62	D1	5	5.1.2	CRIS - Based on FADN income per AWU (average 2016-2018), it is not obvious why it is proposed to grant the payment for farms with an area between 100 to 150 ha (the income per AWU for farms in that category is close to the national average). Further justifications from the swot should be proposed (swot seems to give elements but it is not clear why the cut is made at 150ha. The analysis to be include in chapter 3 (overview on redistribution) should show that the effects expected are relevant. - Please refer to active and not genuine farmer in the introduction - Please provide justification of the unit amount (including min & max unit amounts) for each of the ranges of hectares in relation with the needs assessment (and not by a total envelop divided by the number of ha declared). The justification of the unit amounts can cover the range of values: the unit amount and the min./max.). The justification can e.g. be based on the difference in income per AWU for the different categories of farm sizes. - The definition of min./max in the CAP plan is not technically OK. It is not obligatory to define min/max unit amounts for each range/each planned unit amount. However, there cannot be one maximum amount covering all the three ranges of hectares.(idem for minimum amounts). Elements related to the controls 'pre-pricing and non declared are should not be part of the description of the intervention;
63	D1	5	5.1.3	CIS – YF

				• Result indicator for CISYF is R4, R6 and R7 but no need to establish the link to these RI and to SO1. • R30 is now R36 (generational renewal) and R37 (new jobs supported in CAP projects) • Output indicators should include O.6 which is the main output indicator for CISYF (number of ha CISYF). • Not clear how the moment of the farmer commencing agricultural activities is established; • No need to include the basic requirements in the definition of an intervention which applies to CISYF applicants by definition, e.g. conditionality, BISS requirements.. No clear how the payment is calculated: what is 382,36 eur/ha and what is 67,92 eur/ha? Does the rate of the payment corresponds to the needs? Is the payment granted for all hectares the young farmer has at his disposal?
64	D1	5	5.1.6-5.1.14	CIS general General comments: • Budgetary allocations under VCS and CIS are very similar. Of course, continuity between VCS and CIS is not problematic per se, in fact stability and predictability could even be useful for the sectors concerned. Still, it is important to point out that the support decisions must be made on somewhat different basis under the post-2023 rules: based upon the needs assessment (i.e. the needs identified for each sector concerned) on the basis of the detailed SWOT analysis. It is thus vitally important that CZ underpins its support decisions with relevant statistical data in the SWOT analysis. • However, it is not possible to fully assess the nature and degree of difficulty experienced by the various sectors, or types of farming within these sectors and thus the design of CIS interventions (e.g. eligibility criteria, unit amounts, financial allocations) are not always clearly explained/justified¹. ➤ The SWOT analysis is expected to provide more sector-specific information, including quantitative elements, so as to demonstrate difficulty experienced by sectors that are to benefit from CIS and gauge their income needs (e.g. FNVA/AWU for all sectors)². ➤ The current version of the SWOT provides a rather general description of difficulty undergone by the sectors that are to benefit from coupled payments. It also does not clarify why other potentially eligible sectors for CIS are not considered as experiencing difficulty. Qualitative statements (e.g. referring to negative or low productivity in a given sector) are typically not underpinned by quantitative data. • Given the similarities between the VCS measures and the CIS interventions, the changes in planned outputs with respect to fixed amounts under the previous framework appear to be quite substantial for a number of sectors. The

¹ Information provided in the context of the VCS notifications on 'Description of the Type/Sector', 'Description of the difficulties encountered' and 'The related economic, social or environmental importance' could serve as a basis for justification of how the planned CIS interventions meet their respective pre-conditions.

² Chart 3 in the SWOT analysis presents FNVA/AWU but it does so for arable crop farms and mixed farms only.

driving factors behind these changes should be clear from the detailed SWOT, but it is not always so. For example, why the number of heads, under CIS intervention for beef and veal, is more than 50% larger than the fixed number of heads under VCS? Does this increase mean that beef and veal sector is experiencing lower difficulties compared to the VCS reference period (i.e. productivity has improved, number of animals has increased, etc.)? Similar questions could also be raised for other sectors concerned (starch potato, fruits, vegetables).

To note, given that strictly speaking there is no continuity between VCS and CIS, it is not necessary to explain this in the CAP Plan as long as the reason is the change of targeting. However, should there have been substantial increase of the number of hectares/heads (since the VCS reference period based upon which the VCS fixed number of ha/heads was determined), that may be relevant from the point of view of the justification of the difficulty (if it is justified from economic point of view). It would thus simplify the approval process, if in such cases the production trend could be explained in light of the justification of the difficulty. The natural place of such explanation would be the detailed SWOT, but mentioning of the main conclusions under the intervention's description may also be useful.

Table 1: Comparison of budgetary allocations - VCS 2022 vs CIS 2023 (in euros, unless specified otherwise)

Crop		VCS 2022	CIS 2023	Difference	VCS (% of total VCS)	CIS (% of total CIS)	
1	Starch potato	3,098,494	3,008,368	-90,126	2.4%	2.4%	
2	Hops	3,098,494	3,008,368	-90,126	2.4%	2.4%	
3	Fruit species with very high labour intensity	2,605,797	2,526,601	-79,196	2.0%	2.0%	
4	Fruit species with high labour intensity	1,039,490	1,006,358	-33,132	0.8%	0.8%	
5	Ware potato	1,822,643	-	-	1.4%	-	
6	Vegetable species with very high labour intensity	3,144,424	4,572,179	1,427,755	2.5%	3.7%	
7	Vegetable species with high labour intensity	500,862	737,966	237,104	0.4%	0.6%	1,664,859
8	Sugar beet	16,403,789	15,930,434	-473,355	12.9%	12.9%	
9	Protein crops	16,962,140	16,470,672	-491,468	13.3%	13.3%	
10	Beef and veal	24,638,495	23,927,769	-710,726	19.4%	19.4%	
11	Milk and milk products	51,023,027	49,547,077	-1,475,950	40.1%	40.1%	
12	Sheepmeat and Goatmeat	2,878,345	2,794,250	-84,095	2.3%	2.3%	
Total		127,216,000	123,530,042	-3,685,958	100.0%	100.0%	1.3%

Source: DG AGRI based on ISAMM notification (CZ form 632) and draft CZ CAP Strategic Plan.

Table 2: Comparison of VCS 2022 vs CIS 2023 (fixed amounts/planned outputs and unit amounts)

Crop	VCS 2022	CIS 2023			VCS 2022	CIS 2023	Difference
	Fixed amount	Planned output	Difference	%	Unit amount	Unit amount	

					(area or head)	(area or head)			(EUR per ha or head)	(EUR per ha or head)			
					1	Starch potato	4,378	5,589	1,211	27.7%	707.7	538.3	-169.5
					2	Hops	5,307	5,106	-201	-3.8%	583.9	589.2	5.3
					3	Fruit species with very high labour intensity	5,957	2,915	-3,042	-51.1%	437.4	866.8	429.3
					4	Fruit species with high labour intensity	4,460	4,701	241	5.4%	233.1	214.1	-19.0
					5	Ware potato	20,481				89.0		
					6	Vegetable species with very high labour intensity	8,569	7,358	-1,211	-14.1%	367.0	621.4	254.4
					7	Vegetable species with high labour intensity	2,303	3,466	1,163	50.5%	217.5	212.9	-4.6
					8	Sugar beet	62,400	61,471	-929	-1.5%	262.9	259.2	-3.7
					9	Protein crops	134,000	267,000	133,000	99.3%	126.6	61.7	-64.9
					10	Beef and veal	120,000	186,148	66,148	55.1%	205.3	128.5	-76.8
					11	Milk and milk products	399,518	362,543	-36,975	-9.3%	127.7	136.7	9.0
					12	Sheepmeat and Goatmeat	132,827	134,147	1,320	1.0%	21.7	20.8	-0.8
					Source: DG AGRI based on ISAMM notification (CZ form 632) and draft CZ CAP Strategic Plan.								
65	D1	5	5.1.6 – 5.1.14	- As to consistency of CIS interventions with the Water Framework Directive (WFD): ➤ In accordance with the provisions included in the Basic act, Member States are to assess each CIS intervention's expected impact on water in light of the over-arching EU objective of reaching good status and the programme of measures established under the WFD so as to ensure that CIS support is compliant with the objectives of this directive. Should a specific CIS intervention be considered by the relevant authorities to represent no specific risk in this regard, this could be simply indicated in the respective part of the CAP Plan. ➤ However, should a CIS intervention bear the risk of exacerbating the situation in a region that is already under pressure, the Member State concerned should reconsider the measure and establish eligibility conditions to ensure that the beneficiaries receiving CIS are compliant with the measures defined in the relevant river basin management plan designed to reach the overall objective of good status by the set deadline. As to the aim of CIS interventions (specific box in the SFC template which Member States will use to submit their CAP Strategic Plans), could you please explain how these interventions are expected to address the difficulty(ies) experienced by the sectors concerned by way of improving their competitiveness, quality, or sustainability? - The targeting of an intervention should be based upon the justification of the difficulty (i.e. assessment of the sector's situation in the detailed SWOT analysis) and/or intervention's aim (to address the difficulty by improving									

				competitiveness, quality, and/or sustainability). Therefore, elements of the targeting (e.g. minimum number of animals, minimum yields, etc) should always be justified accordingly. Regarding the WTO aspects, we understand that all the CIS interventions are designed as “Amber box”. For each CIS intervention, the text also provides that <i>“Coupled income support interventions shall not have any trade-distorting effects or production-distorting effects.”</i> This would need to be justified, also underpinned by evidence in the SWOT analysis, in particular for sectors that typically produce for exports, or whose output indicator is substantial compared to local consumption and is foreseen to further increase during the support period.
66	D1	5	5.1.7	CIS – vegetables The eligibility conditions include, among others, a reference to the minimum quantities for sowing/planting. Please specify these minimum quantities. What factors are driving changes observed in planned outputs (ha) with respect to the fixed amount of ha under the current VCS framework)? (to note, it is not necessary to explain this in the CAP Plan, as there is no continuity between VCS and CIS. see under the general questions above)
67	D1	5	5.1.8	CIS – Fruits The eligibility conditions include, among others, references to the minimum number of ‘viable specimens’ as well as a minimum yield of a given fruit species per hectare. Could you specify these minimum criteria? Furthermore, what is the rationale behind including both the minimum number of species and a minimum yield per hectare? To what extent these two conditions taken together are relevant for addressing the difficulty experienced by the fruit sector? Note that you do not seem to follow such an approach for vegetables. But more importantly, would the farmer still remain eligible for this support if the yields were to be negatively affected by adverse weather conditions (drought, flooding) to such an extent that the minimum yield condition could not be met?
68	D1	5	5.1.9	Milk and milk products : Description of the intervention states, among others, that: <i>“It is intended to help Czech breeders to be competitive vis-à-vis breeders from other EU countries.”</i> This seems to be inconsistent with the claim made later under a different section that this intervention <i>“shall not have any trade-distorting effects or production-distorting effects.”</i> One possibility would be to only refer to improvement in competitiveness of the Czech breeders in general.
69	D1	5	5.1.11	Sugar beet: Please specify the minimum quantity of seeds per hectare under the eligibility conditions.
70	D1	5	5.1.12	Beef and veal:

				• This intervention is granted irrespective of the farm size/number of animals and type of production. Are the difficulties experienced by this sector identical across farm sizes or type of production (breeders, breeders and fatteners, fatteners) or intensity of production process (extensive vs intensive farming)? • In the context of a planned increase in the number of supported animals, would the setting up of a maximum threshold under the eligibility conditions be warranted (e.g X euros between 1 to 50 heads, Y euros between 51 and 100; Y being lower than X). • What factors could explain the change observed in the planned output (number of animals) with respect to the fixed number of animals under the current VCS framework)? (see respective general comment) Finally, according to the FADN data, beef and veal farms benefitting from the Voluntary Coupled Support in the Czech Republic seem to be, on average, extensive farms. Could you confirm this? If this were to be the case, the extensive character of beef and veal production could also be used as one of the elements in the context of justification of the overall sustainability of CIS for this sector, and in particular consistency between CIS and the Water Framework Directive.
71	D1	5	5.1.14	Starch potato • The eligibility conditions include references to both the minimum seed quantity (2 tonnes/ha) and the minimum yield (6 tonnes/ha). Similarly to comments made for the fruit sector, to what extent these two conditions taken together are relevant for addressing the difficulty experienced by the starch potato sector? Would the farmer still remain eligible for this support if the yields were to be negatively affected by adverse weather conditions (drought, flooding) to such an extent that the minimum yield condition could not be met?
72	D1	5	5.1.15	• Eligibility : <i>'The area declared in the aid application must be farmed'</i>. What is meant by <u>farmed</u>? Same rules as in BISS should apply, maintenance of land should also be eligible. No explanation why stricter approach. • Why is it decided to target the support to farmers up to 6ha? This decision should be justified based on statistical data. • 226 EUR * 6ha is above max. of 1250 EUR. Min/max should be justified, it is crucial because they are very broad (282 to 170) and so far nothing seems to be able to justify it. • Why is the amount per hectare set at EUR 226? Will each farmer receive the same lump sum per hectare or will the system correspond to the "payment due" method with a different payment per hectare for each farmer as under the current system. The explanation provided is not clear. In the cap plan it says : <i>'The amount of the payment will be calculated on the basis of the budget allocated to decoupled direct payments. The payment will be set in such a way that the rate is the sum of the BISS payments + top-up redistributive payment + CAP-wide eco-payment'</i>. The unit amount should be justified based on relevant statistical data. The small farmer payment is intended to provide an advantage for small farmers and we would therefore expect it to contain an element of redistribution. In other words, we

				would expect the amount of support received by these farmers to be higher than under the 'normal' system. Is this the case? Please elaborate this aspect based on data. If this payment corresponds to the 'payment due' system under the current regulation, why is the system set up? Simpler administration?
73	D2	2	2.1.5.1	The needs assessment for SO5 does not address the promotion and efficient management related to air (e.g. pollutions from ammonia emission). It is suggested to create a link to assessment SO4 (identified need: reduce GHG and ammonia emission).
74	D2	3	3.5.1.1	GAEC 1: The part on environmentally sensitive areas is relevant to GAEC 9, to be moved there.
75	D2	3	3.5.1.3	GAEC 3: What are the cases/exemptions for authorisation of the burning of arable stubble?
76	D2	3	3.5.1.3	- GAEC 6: what is the scope of the area concerned in hectares? - Furthermore, GAEC 6 needs to address tillage management (not soil processing) (on top of the approaches already indicated that are relevant by Czechia). - It would be relevant to provide some examples of crops per category as indicated under the summary of farm practices. Can CZ provide more detail on the slope gradient for GAEC 6?
77	D2	3	3.5.3.2	- GAEC 7: Does it only cover areas with a slope in excess of 4 degrees? What is the area coverage of the GAEC when implemented? - The text provides: <i>"The options for meeting this standard are defined in such a way as to ensure soil cover, to prepare the soil for other crops, while at the same time meeting IPM conditions"</i>. However, what are the conditions that will apply, e.g. for soil cover. - In addition: the text provides: <i>"Another option is to carry out autumn tillage in any farmer's chosen depth, including deep tillage, and to keep it until the spring period"</i>. This is out of the scope of the GAEC and a priori not acceptable. What is the rationale of adding organic matter at a minimum rate of 25 per hectare. No agronomic background is provided.
78	D2	3	3.5.3.3	GAEC 8a: What is the definition of "same crop" (e.g. are winter/spring varieties different crops)? Catch crops or intermediate crops can be allowed, but this coverage should stay a sufficient time to get a break between two main crops. 8 weeks is not in line with this sense. At least 4-5 months.
79	D2	3	3.5.3.3	GAEC 8: We understand the authorities propose 2 options for GAEC 8, how do these options relate to/interact with each other.
80	D2	3	3.5.4.1	GAEC 9: are hedges not covered under landscape features?
81	D2	5	5.1.4	Eco-schemes What is meant by minimum maintenance? Please specify the requirements.
82	D2	5	5.1.5	There are obligations for the activities under an eco-scheme to go beyond the baseline (i.e. conditionality) but information

				for some sub-measures is missing. For example, for interventions 1 and 4 (related to permanent grassland (T and G), no detail is presented on the requirement or eligibility conditions. Czechia is requested to further clarify the conditions of all sub-measures.
83	D2	5	5.1.5	It is unclear how the whole-farm eco-scheme, point 11 non-productive features (R+U+G) goes beyond the baseline of GAEC 9? Is there an increased percentage required of landscape features compared to the baseline?
84	D4	SO5	SWOT Table 3	SP Annex SO5: Table 3 Land-cover change for agricultural and forestry land: There is a big difference in forest cover between 2019: 33.9% and 2020: 40.0% and also in the Strategic Plan it is written that forest land covers around 34 % of the territory of the Czech Republic: it should be checked/explained.
85	D4	SO5	SWOT 3.1.III	III. Soil acidification, forest soils are not mentioned. However, at the end of 80s this was also an issue. But it is mentioned in SO6. Therefore, consistency is needed.
86	D4	SO6	SWOT 2.2	<i>"The management of Natura 2000 is costly; The financial resources required for the restoration and maintenance of grassland and the species linked to it are estimated at around CZK 813 million per year (Source: Update of the Priority Framework for Action for Natura 2000 in the Czech Republic)".</i> This figure should be carefully checked. From the PAF it would be important to know what are the most important habitats and species needing management practices from agriculture and forestry. The CAP has not the objective to include all what is mentioned in the PAF for Natura 2000.
87	D4	SO6	3.9.2	High negative impacts of historical pollution <i>"Combined with climatic fluctuations, the stability of forest ecosystems is disruptive, often large in size. This is linked to the issue of locally non-native replacement species planted under time pressure, for a limited period of time to maintain the forest environment and to preserve the other functions of the forest. Nowadays, these crops are gradually becoming degraded, with inadequacies, the risk of which they have been planted."</i> It would be good having more concrete information on the mentioned species and problem occurred.
88	D4	4	4.1	Do you have a definition of the Forest?
89	D4	5	5.3.7	Description of the interventions 5.3.7. Technological investments in forestry Question to Project D , basic processing of wood. How the plan will ensure that the support will not go beyond the industrial level of processing, since the forest-based industries are covered by the industrial policy? It is particularly sensible for sawing of the wood, which could be done at industrial scale. Q: Whether to keep the existing (under 2007-2013, and 2014-2020 programming periods) capacity limit to +/- 10.000 m3 roundwood input per year as indication that the processing is prior to industrial level.
90	D4	5	5.3.8	5.3.8 Investments in forestry infrastructure: with regard to (Eligibility conditions) "Project A) Investments in forest roads the implementation of the project will not increase the density of the forest transport network on the applicant's forest assets above its optimum level", it is not clear how the optimum level is set for each applicant.
91	D4	5	5.3.14	5.3.14 Investments in rehabilitating calamity areas <i>"The payment <u>compensates the damaged forest potential</u>, which was lost to applicants due to a disaster."</i>

				Question: The legal base of the compensation payments for the damaged forest potential is questionable, since it is not in the CAP SP Regulation and it was not eligible under the previous periods neither. The formulation should be clear that the support can cover up to 100% of the cost occurred during the restoration.
92	D4	2	2.1.8	SWOT SO8 The bioeconomy seems to be out of the scope of the SWOT carried out. For instance, although an analysis is done under SO4 to assess the biomass availability and potential from agriculture and forestry for energy production, there is no such assessment to see to which extent both agriculture and forestry could contribute to the development of the bioeconomy in general. In addition, there may be other aspects (such as skills or investment costs) that could be supported in order to see the bioeconomy developed in CZ rural areas.
93	D4	2	2.1.4	SWOT SO4 It is not clear to which extent forests can (or not) contribute to provide biomass for energy purposes.
94	D4	SO4	SWOT	Data on GHG emission seems different from what reported under the UNFCCC (https://www.eea.europa.eu/data-and-maps/data/data-viewers/greenhouse-gases-viewer). Explain the differences. Map of Soil organic carbon are missing, only overall National average is presented. Map would help to better define carbon farming strategies. Analysis of short term and long term vulnerabilities related to climate change, for example for water availability, flooding or yield projections, in order to define best adaptation strategies, are also missing.
95	D4	SO4	SWOT	Switch from perennial crops to annual crops in order to face with rising temperature and declining crop yields, as adaptation measure, should be done in a way that soil organic carbon is protected and enhanced.
96	D4	2	2.1.4.4	Not clear how Schemes for the climate and the environment – CAP-wide eco-payment, and Schemes for the climate and the environment – extensive management on TTP, will contribute to carbon sequestration and protection (carbon farming). It seems eco-schemes will only refer to grasslands. Other relevant ecoschemes are placed in other objectives. All relevant for soil organic carbon, increase of removals in soil and biomass could be labelled as carbon farming
97	D4	2	2.1.4.4	Advisory, knowledge transfer and innovation are also very relevant for emissions reduction and carbon removals, but not indicated in the table.
98	D4	6	6.1	Why for indicators R13 and R20 nothing is foreseen? (Indicators Ammonia reduction)
99	D4	8	8.1.3	The description of the Farm Advisory Services should include the means envisaged for the implementation of the FaST
100	E4	2	2.1.8.1-5	General comments: The SWOT analysis and the identification of SC8 needs is well interlinked with the analysis of the situation of agriculture and rural areas provided in Annex 'SO 8'. The identification of the main strengths, weaknesses, opportunities and threats is comprehensible and flows logically from the analysis of the situation of agriculture and rural areas provided in SO 8. The below comments result from the consistency check based on the <u>Annex SO 8 analysis</u> as well as on <u>the CAP Strategic Plans Recommendations for Czechia</u> . As a conclusion, the following elements shall be highlighted to higher extent in the

				current draft CAP Strategic Plan: • Provide more information on how CZ CAP Plan aims at strengthening the role of women in farming and rural communities; • Provide more information on the involvement of the partners representing civil society or bodies responsible for promoting social inclusion, fundamental rights, gender equality and non-discrimination in the preparation and monitoring of the implementation of CZ CAP Plan; • Provide more information on how CZ CAP Plans aims at enhancing socio-economic inclusion of Roma community; • Provide more information on how CZ CAP Plans aims at speeding up the development of bio-economy sector.
101	E4	2	2.1.8.1-5	Specific comments: • In relation to the '<u>Weaknesses</u>' on p. 76 of the CAP proposal and for the sake of the consistency with the Annex 'SO 8' as well as the CAP Strategic Plans Recommendations, the following references shall be highlighted: ○ an employment rate gap between rural women and rural men; ○ low proportion of female farm managers in CZ compared to EU average; ○ the poor employment outcomes of disadvantaged groups (people with low educational attainment, people belonging to ethnical minorities including Roma people); ○ underdeveloped potential of bioeconomy sector. • In relation to '<u>Opportunities</u>' on p. 76 a reference shall be added to: ○ Enhanced participation of women in employment including their access to farming jobs/farming management jobs. ○ Measures that would increase the participation of women in decision making; ○ The potential of underrepresented groups (for example Roma minority, people with lower educational attainment) for the development of rural communities; ○ The opportunity of further development of bioeconomy sector. In relation to '<u>Identification of needs</u>' on p. 77 and as regards P8.01, a reference to a dedicated support for women and Roma shall be added to ensure the consistency with Annex 'SO.8' that underlines lower employment outcomes and their higher (than men) at risk of poverty or social exclusion rate.
102	E4	2	2.1	P1.04 – statement on low impact of risks of animal diseases – contradiction with SWOT SO1, page 22. Even identified as threat under T1 – page 45 of SWOT. Provide data about low impact of risks from animal diseases to justify the statement.
103	E4	2	2.1	P3.01 – SSC – “partial” contribution. To be explained (as well in other “partial” cases e.g. 4.03, 4.04....) where other contribution to such a need can be find to be sure that a need is fully satisfied?
104	E4	2	2.1	P3.03 – no contribution of CAP plan to the need of quality of agricultural products is quite surprising. How this need will be satisfied?
105	E4	2	2.1	P4.03 – use of biomass is “partial”. Which intervention is contributing then? See part 2.1.4.3 – seems to be outside CAP

				plan.
106	E4	2	2.1.4.2	R.9 – text on duplicity is not clear, what is number 26 350?
107	E4	2	2.1.7.6	R.37 – contribution of YF as new jobs creation – do you take into account possibility of replacement of “old” farmers?
108	E4	2	2.1.8.2	P8.03 – broadband in rural areas – please provide detail how target 3.1 will contribute to internet coverage in rural areas via TAK (detail could be in chapter 4.6).
109	E4	2	2.1.9.5	AW allocation of 152 Mio EUR – is it total public allocation? It would represent only 70% of present RDP.
110	E4	2	2.1.10.4	R2 – 1650 advisors. What is number of advisors at present under national scheme?
111	E4	3	3.5.2	DZES 4 – why the term “pesticides” is there in brackets?
112	E4	3	3.5.3.4	Limit of 30 hectares – we understand that this limit has already been applied now. What is its practical impact on the sizes of blocks? (analyse of the situation before and after its introduction).
113	E4	4	4.1.2	Definition of arable land, there is also “standard arable land” category – what is it? Typo (2x para on grassland).
114	E4	4	4.8.2	Definition of rural areas – seems to be the same as in current RDP. Please provide data justifying exclusion of only 6 large towns. Missing definition for LAGs coverage (RDP now as cities below 25.000 inhabitants)
115	E4	4	4.6	Complementarity with other programmes - missing RRP – link to water retention interventions, land consolidation etc. Confirmation: Bark beetle calamity will not be targeted via CAP plan (remain in RRP and state aids).
116	E4	5	5.1.5	7. Hops yards – what is “sustainable management of organic matter”?
117	E4	5	5.3.12	How was set minimum density 100 trees/ha?
118	E4	5	5.3.19	Support for ecological areas is acknowledged. However, entirely is missing intervention supporting marketing of ecological products, stimulating demand for ecological production. Great majority of areas is grassland and share of income spent on ecological production in Czechia is very low (20 EUR/year).
119	E4	5	5.3.20	Land consolidation is attributed to SC5. Therefore, we understand that 100% of investment will fully have environmental character (erosion, water retention etc.) and no roads etc. will be supported. This would also justify the use of R27 and not R29. Note that current RDP has very poor contribution in this respect.
120	E4	5	5.3.22	Is this title as additional support to aid under the title 5.3.19 – Ecological farming on grassland?
121	E4	5	5.3.33	You refer to 4 water reservoirs but described is only Svihov. To which area correspond estimated 70.000 ha? How was the level of POR established in comparison of baseline in such areas?
122	E4	5	5.3.35	Recommendation is not to support chemical preparations (is it against insect??), biological preparations should be preferred.
123	F1	3	3.1	Chapter 3.1. ‘Overview of interventions contributing to ensuring risk management’ The SWOT analysis identified the “need to strengthen long-term sustainable risk management taking into account the potential scale and impact of market and climate risks (need P1.04)”. Please check in the SWOT analysis if there are elements about the availability, the coverage and use (by sector, by size) of risk management tools. These elements should

				be in consistency with Chapter 3.1. The Chapter focuses more on national schemes supporting plant & animal diseases, without any information about how important disturbances in agricultural production system caused by adverse climatic events or price volatility in the markets are addressed. For CAP plan, there is a very short reference to the strategic choice of implementing preventive measures including advice, without additional information. In general, the Chapter should be further developed, by presenting how risks related to agricultural production, including market and climate risks, are addressed either at national or at CAP Plan level (sectoral & rural development interventions).
124	F1	5	5.3.1	Intervention 5.3.1 Areas facing natural and other constraints (ANC) Description of the intervention: what does ,increased intensity of land processing and limited land use options’ mean? The corresponding needs (codes) addressed by the intervention are not yet included. There are some points to be clarified as to the language used, e.g. the word ‘commitment’ is used. However, it should be emphasised that ANC payments are not commitments. This might also be due to translation . Degressivity of payments: There are still doubts whether additional costs or loss of income could be compensated with economies of scale already at a threshold below 300 ha and whether a reduction by only 30% is justified above the threshold of 2500 ha. Eligibility conditions – it has to be clarified that this payment can only be granted for designated ANC areas. A respective link to the national list of the relevant local administrative units designated and to the ANC Maps should therefore be provided (see tool 5.3.2). The fine-tuning is mentioned but it is not clear whether an updated fine-tuning compared to the current period has been applied. The text on the designation is rather a repetition of the legal provisions than a description of the CZ circumstances. The codes used for differentiation of payments should be better explained – is H1-H5/O1-O3 a differentiation according to severity of constraints? What are cultures B, O, L and M (not eligible for payment)
125	F1	5	5.3.2	Intervention 5.3.2 Natura 2000 areas on agricultural land Output indicator O. 3 Number of CAP support beneficiaries should also be included (this indicator is not used for clearance and only for the monitoring and evaluation purposes). In the description of the measure/restriction it should be clear that the measure is already in place by a relevant nature law – is this the case ? Does the measure restrict manure application or just chemical fertilisers ? The intervention is not detailed enough especially with regard to the GAECs to know what exactly is being compensated for. Do the stepping stones areas require more measures – is this the reason for the higher premia ?
126	F1	5	5.3.9	Intervention 5.3.9 GHG and NH3 emission reduction technologies On indicators: Intervention is linked to R.16 (Climate-related investments) and R27. Note that R27 covers investment

				support in rural areas (and not on farms) and thus does not seem to be the right indicator for this intervention which is about on-farm investments (linked to O.20). R.9 (Farm modernisation: Share of farms receiving investment support to restructure and modernise, including to improve resource efficiency) could be relevant for this intervention. Along with these investments in precision agriculture will the CAP Plan also include relevant management commitments to address the needs identified for emission reduction?
127	F1	5	5.3.10	Intervention 5.3.10 Afforestation of agricultural land: establishment Intervention is linked to O.20 (Number of non-productive investment operations or units supported per holding). Afforestation cannot be considered a non-productive investment, but it can benefit from a 100% support rate (see art 68(c)(i)).
128	F1	5	5.3.12	Intervention 5.3.12 Establishment of an agroforestry system Same comment as above: Intervention is linked to O.20 (Number of non-productive investment operations or units supported per holding). Establishment of agroforestry cannot be considered a non-productive investment, but it can benefit from a 100% support rate (see art 68(c)(i)).
129	F1	5	5.3.16	5.3.16 Water management measures in forests The objective of this measure and the link to identified needs is not entirely clear. How does this link to the Flood Risk Management Plans and WFD objectives? It seems to be based on the current M8.3 (support for prevention of damage to forests from forest fires and natural disasters and catastrophic events) and M8.4 (support for restoration of damage to forests from forest fires and natural disasters and catastrophic events), but very much with a “water dimension”. O.23 (Number of supported off-farm non-productive investments operations or units) has been chosen for this intervention – this would only be adequate for nature based preventive measures, but not for restoration. Separate interventions may thus need to be envisaged. The measure seems to combine investments in the restoration of flood damage (done to forests and water courses) with preventive measures. For the preventive measure, do they include both natural flood mgt measures and investments in infrastructure?
130	F1	5	5.3.19	Intervention 5.3.19 Organic Farming The starting level in share of OF in total UAA and the contribution of this intervention to the GD target of 25% at EU level should be mentioned (including the final targeted share of OF for CZ, in 2027 749 885 ha are envisaged). There is no reference to the OF Regulation 2018/848, instead, all different obligations for the different crop groups (‘titles’ are listed under eligibility conditions. If these commitments are in line with the OF Regulation, they do not have to be listed

				(and in any case they are not classified as ‘eligibility condition’) There is no indication on the duration of the commitments (for both, conversion and maintenance). Please note that the length of the conversion period might differ between types of crop. Some terminology needs revision – e.g. conditionality instead of cross-compliance (might be due to translation) LB: eligibility condition of minimum 0.5 ha seems very low to achieve significant benefits in terms of improved groundwater, etc. It would be best to ensure training at an early stage of the commitment.
131	F1	5	5.3.20	Intervention 5.3.20 land consolidation Usually, non-productive investments (NPI) are investments that do not lead to any significant increase in value or profitability. Typically, they aim at purely environmental improvements and are linked to the achievement of agri-environment-climate objectives. Examples would be the creation and/or restoration of landscape features, such as wetlands, hedges, dry-stone walls and traditional boundaries, or the creation and/or restoration of habitat or landscape elements. Land consolidation is not a typical NPI investment; therefore, more detailed information on the proposed intervention is needed. It is not sufficiently clear what this intervention is aiming to do and what need it is addressing and how it will be addressed. Is it about natural flood management that would be in line with the water framework directive good status objective or is it about restoring and increasing artificial drainage and other ‘hard’ flood infrastructure ? Does the need stem from the WFD RBMPs ? What is the remit of the State land office with regard to land/water /soil ? It is not clear what these are (Act No 139/2002 Coll and a draft joint facility plan).
132	F1	5	5.3.21	5.3.21 AEKO – Treatment of valuable grassland There is a reference to the biodiversity strategy but is the measure also fully in line with the prioritised action framework? The results based component - means this is a hybrid AECC and this option should be selected in SFC .
133	F1	5	5.3.22	Intervention 5.3.22 Organic farming contributing to biodiversity in TTP The title is misleading (obviously due to translation) as the description is not linked to organic farming but to HNV grassland in N2000 areas, please confirm. The differences between this intervention and intervention 5.3.21 AEKO Treatment of valuable grassland is to be clarified. LB: the wording “apply fertilisers to all grassland...” is concerning; perhaps there is incorrect translation of the text.
134	F1	5	5.3.23	Intervention 5.3.23 AEKO – Landscape forming orchards It states that the intervention <i>follows</i> the basic conditions of GAEC 9/SMR 3 and SMR 4 and min reqs for pesticides and fertilisers. How does it go beyond the GAEC requirements. Only the specific practises that go beyond this are those that can be the basis of the payment.

135	F1	5	5.3.24	Intervention 5.3.24 AEKO – Promotion of biodiversity on arable land There is very good level of detail on this measure that should be replicated for other measures – it is clear what is being paid for (what’s beyond the baseline).
136	F1	5	5.3.25	Intervention. 5.3.25 Forest-environmental payments — Biodiversity It could be made clearer how this relates to the needs identified. Eligibility conditions for “Conservation of the stock type of the farm population” are not sufficiently clear. Where is this intervention targeted to (within the “Natura 2000 area and the SPA”)? Eligibility conditions for “Conservation of habitat trees” are more clear. What does the actual mgt commitments consist in? Is this, in both cases, limited to a commitment to postpone harvesting to allow for natural regeneration? (The text states that <i>“the payment is based on compensation for damage resulting from the postponement of intentional harvesting for the duration of the commitment, so that the existing plant type/habitat tree with less economic use is maintained”</i>). Will this be sufficient to address the needs identified? The text refers to SMR 12 - Do you mean SMR 3 and 4 on the Birds and Habitats Directive? The baseline is not identified. Payments can cover only commitments which go beyond the relevant mandatory requirements established by the national forestry act or other relevant national legislation. These requirements need to be identified in the CAP Plan.
137	F1	5	5.3.26	Intervention. 5.3.26 Forest-environmental payments – Genofund (This is a management commitment about environmentally friendly seed collection (collecting seeds from certified sources of selected reproductive material)). Description and purpose of the intervention are clear. Why is there a reference to SMR12? However, it could be highlighted that the objective is to preserve plant genetic resources naturally adapted to the local and regional conditions (the aspect of threat of genetic erosion is covered). We understand that the activities supported include both, targeted actions promoting in situ and ex situ conservation, characterisation, collection and utilisation of genetic resources in forestry. Please confirm (see also draft DA to be adopted, as discussed in the expert group meeting on 13 October.)
138	F1	5	5.3.23	AEKO – integrated production Given that the SUD is included in conditionality– it is important to define what is beyond conditionality and can be paid for via this measure. The SUD is not mentioned in the baseline.
139	F1	5	5.3.33	5.3.33 AECM — Restrictions on pesticide use in OPE on arable land Given the problem identified with regard to pesticides in drinking water why are voluntary measures (under AEC) only considered – could legal restrictions not be established for drinking water protected areas (high risk areas) in the 3rd water

				RBMPs - and these can then be (partially) compensated via the WFD compensation payment intervention?
140	F1	5	5.3.34	Intervention 5.3.34 Increasing the capacity to defend pigs by vaccination The design of this intervention focusing only on vaccination in order to reduce antimicrobial use is too limited. In particular, it should be recalled that where animal welfare commitments are made to provide for upgraded standards of production methods, the areas should be defined. In doing so it should be avoided that those animal welfare commitments overlap with standard farming practices and in particular vaccination to prevent pathologies. (see recital 35 of the draft DA to be adopted, as discussed in the expert group meeting on 13 October.) The intervention could rather consist of measures of biosecurity and sanitary preventive measures against non-transmissible diseases that do not require the use of medical substances such as vaccines, insecticides or anti-parasitic drugs.
141	F1	5	5.3.35	Intervention 5.3.35 Animal welfare The intervention needs to be further developed to show greater ambition regarding animal welfare. For example, it is not clear how the lying space proposed for dairy cattle will significantly enhance their welfare. It is unclear how allowing outdoor access to dairy cows improves animal welfare during periods of drought; provision of, for example, improved water supply and shade, would be necessary. Furthermore, it is unclear how the health improvements proposed increase animal welfare; this needs to be clarified. 230-day rule for gilts seems to be baseline rather than improved animal welfare.
142	F1	5	5.3.36	Intervention 5.3.36 Exclusion of sows from individual cages This intervention, whilst potentially beneficial for sows, is very vague e.g. inadequate eligibility conditions, and no definition of the size of farrowing pens. How would compliance be monitored?
143	F1	5	5.3.37	Intervention 5.3.37 Change of housing technology for laying hens This intervention, whilst potentially beneficial for laying hens, is very vague e.g. inadequate eligibility conditions. How would compliance be monitored?
144	F1	5	5.3.31	Leader Overall this intervention seems to be at the very early state of development. Many crucial sections are missing, for example, indicators, description (how all 7 features of LEADER will be taken up by all LAGs), scope of operations under Local Development Strategies, expected added value of LEADER, institutional set up etc. • The definition of rural areas as the whole country except 6 cities is problematic (justification) • LEADER is part of Cooperation intervention – the condition that at least two actors are involved is deemed fulfilled by definition as LEADER is based on a partnership;
145	F1	5	5.3.19	Eligibility condition of minimum 0.5 ha seems very low to achieve significant benefits in terms of improved groundwater,

				etc. If the aim is for very wide eligibility/uptake, would this be better suited as an eco-scheme? It would be best to ensure training at an early stage of the commitment (length isn't specified). Minimum intensity of livestock, minimum maintenance of grassland, etc., are mentioned but what about maximum? Why are strawberries and potatoes specifically mentioned, and what is the added value in terms of organic farming?
146	F1	5	5.1.4 5.3.21 5.3.22	The wording "apply fertilisers to all grassland..." is concerning; perhaps there is incorrect translation of the text. Minimum livestock density is mentioned; what about maximum?
147	F1	5	5.3.35 5.3.37	General AW: The intervention needs to be further developed to show greater ambition regarding animal welfare. For example, it is not clear how the lying space proposed for dairy cattle will significantly enhance their welfare. It is unclear how allowing outdoor access to dairy cows improves animal welfare during periods of drought; provision of, for example, improved water supply and shade, would be necessary. Furthermore, it is unclear how the health improvements proposed increase animal welfare; this needs to be clarified. 230-day rule for gilts seems to be baseline rather than improved animal welfare.
148	F1	5	5.3.36	This intervention, whilst potentially beneficial for sows, is very vague e.g. inadequate eligibility conditions, and no definition of the size of farrowing pens. How would compliance be monitored?
149	F1	5	5.3.37	This intervention, whilst potentially beneficial for laying hens, is very vague e.g. inadequate eligibility conditions. How would compliance be monitored?
150	G1	5	5.2	General comment: Outputs, unit amounts, milestones and targets missing from all interventions (just a taking of note, no problems if these would be added later).
151	G1	2	2.1.2.1	Summary of SWOT for SO2 – one of the weaknesses is "the predominance of the production of products with lower added value is reflected in the value-added indicator, which is half of the EU average." Value added in percentage terms gives a twisted picture as in many cases low value added by producer in percentage is actually high in absolute terms and vice versa. This is because in basic products (like cereals) producers share is high and in processed products this share is low. In absolute terms however, it is much more profitable for the producer to produce processed products (GIs etc.) than basic products. This indicator shall be clarified before making use of it.
152	G1	2	2.1.2.2	Not clear if needs are prioritised. Needs should be prioritised across all SOs, not within one SO.
153	G1	2	2.1.2.3.	Intervention strategy for SO2 – sectoral interventions are applied only in wine and apiculture sectors where it is obligatory but other sectors are addressed by RD and direct payments (CIS). Similar type of interventions (investments for example) also available under sectoral interventions, why not planned (as it is done in SO3)?
154	G1	5	5.2.1.1 - 5.2.1.10	Transnational territorial scope – does it mean the support would be channelled through transnational producer organisations. If not, clarification needed.
155	G1	5	5.2.1 et al	WTO classification of sectoral interventions in F&V and "other" sectors seems to be missing.

156	G1	5	5.2.6	Wrong code for output indicator (pre-scrubbing code used). Typo.
157	G1	5	5.2.10	CZ seem to want to create a sort of a jumbo-intervention in the potato sector, covering large number of “types of interventions” and eligible expenditures with one intervention. That means just one intervention in a potatoes sector under which POs can get support for whatever they do, which in one way or another belong under the CAP or sectoral objectives. That is not the idea of an intervention, according to SPR Art 3(3) and 111, each intervention must be based on just <u>one</u> type of intervention (as set in Art. 47). Same issue also with other sectors but to a lesser extent.
158	G2	5	5.2.1	It is not advisable MS to be strict in selection of possible interventions. This is important that producer organisations are granted a wide margin of manoeuvre to ensure that operational programmes comply with 1) 15% (ENV/CLIMA), 2) 2% (RT&D) and 3) three or more actions requirement (see below). MS by not offering a wide diversity of interventions within the types of Art 47 of SP Regulation would hamper the effectiveness and performance of producer groups and limit producer organisations to respect these requirements.
159	G2	5	5.2.1	MS should specify in their plans that <u>15 %</u> of the costs of the operational programme of the PO must be earmarked for environmental and climate measures (Article 50(7)(a) of the SP Regulation). The draft CAP plan does not provides any figure proving that 15 % are actually foreseen for environmental and climate measures. Point 5.2.1.4. could be extended regarding the environment and on climate as well as point 5.2.1.5.
160	G2	5	5.2.1	MS should ensure that at least <u>2%</u> of expenditure under operational programmes covers the intervention linked to the objective referred to in point (d) (research, development and innovation) of Article 46; Even though point 5.2.1.1. relates to research, it does not provide figures on the share of this intervention.
161	G2	5	5.2.1	MS should be reminded that operational programmes should include <u>three</u> or more actions (80% of member of PO rule) linked to the objectives referred to in points (e) (<i>env, pest diseases, animal health, reduction of waste, biodiversity and natural resources</i>) and (f) (<i>climate change mitigation and adaptation</i>) of Article 46 of the SP Regulation;
162	G2	5	5.2.1	MS should make sure that the interventions within the types of interventions referred to in Article 47(2), points (f), (g) and (h), do not exceed one third of the total expenditure under operational programmes.
163	G2	5	5.2.1	MS should be reminded about the objective on improvement of the conditions of employment, occupational health and safety (Article 46 (k) of the SP Regulation);
164	G2	5	5.2.1	MS should be reminded about the possibility of granting national financial assistance (NFA) Article 53 of the CAP SP.
165	G2	5	5.2.1.6	There is one aspect in relation to promotion of consumption of fresh fruits and vegetables, which is captured in point 5.2.1.6. but it is still weak; therefore, CZ could attach great social importance to promoting the consumption of fruit and vegetables. This could be done through various national/EU initiatives, promotion programmes, including school Fruit and vegetable programme and aiming at changing people’s eating habits, increasing consumption among young people, informative campaigns about the health benefits of fruit and vegetable (for example, new varieties with higher level of

				Vitamin C).
166	G2	5	5.2.1.6	Moreover, it needs to be reminded that according to Article 52(2) the limits of the Unions financial assistance to the fruit and vegetable sector can be increased by 0.5% provided that the amount in excess is used solely for interventions supporting increasing competitions of the products of the fruit and vegetable sector (fresh or processed).
167	G2	5	5.2.1	It is advisable to verify whether under investment intervention MS would also like to make eligible 'investments' with the time span less than 1 year. This should be avoided as this is could regarded as operational/running costs. Transportation costs are not eligible within the premises of producer groups.
168	G2	5	5.2.1	For information only: MS should be reminded about the transitional rules (Article 10 of Regulation (EU) 2020/2220). <i>Article 10 (2): 'Operational programmes for which an extension in line with the maximum duration of five years referred to in the first paragraph is to be approved after 29 December 2020 may only be extended until 31 December 2022.</i> <i>Article 10 (3): By way of derogation from the first paragraph, new operational programmes that are approved after 29 December 2020 shall have a maximum duration of three years.'</i>
169	G4	3	3.3.8	Sugar beet is included in the SWOT analysis but not included in the Sectoral interventions of the CAP Strategic Plan. This may be explained by the fact that there is no Producer Organisation existing for sugar beet and the representatives of the federation do not foresee a significant interest in the PO. Could CZ explain why sugar beet is not included in the sectoral interventions?
170	G4	5	5.2.11 5.2.12	The description of interventions in hen sector and ornamental plants through operational programmes seems to respect Article 111 SPR, except the following elements: an explanation of how the amounts referred to in point (h) of this paragraph were set; Article 111(i) SPR requests to provide explanation as regards how the unit amounts were set. This information is not provided by CZ. CZ provided the output indicators and the total amount. However providing the output indicator and the total amount is not enough to explain the unit amount since output indicator should in any case be provided under Article 111(g) SPR and total amount is the result of a simple calculation based on unit amount and output indicator. (j) where applicable: (i) the form and rate of support; => see Article 44 SPR. Article 111(j)(i) SPR requests to provide information as regards the form and rate of support of the described intervention. This information is not provided by CZ.
171	R1	5	5.3	In the Rural Development section, the contribution rates are missing for nearly half of the interventions, which is a crucial information for our financial assessment. Under interventions 5.3.14 and 5.3.28, you refer to a contribution rate of 60% but apply a contribution rate of 35%. If the requirement to allocate the amount allocated for young farmers set out in Annex 12 under the Direct payments should be partly/fully met under the Rural development section a breakdown per FY is needed in that section.

172	R1	6	6.2	Financial tables: Overview table missing. There seems to be a confusion from CZ on the financial tables referred to in Article 112. The <u>overview table</u> (Article 112(2)) <u>has to be filled in by the MS</u> indicating e.a. their intention to make use of the flexibility transfers up to FY2027 (CY 2026 for DP), how they allocate their funds, how they meet the ring-fencing requirements... all these data being binding for MS. Only the <u>detailed financial table</u> (Article 112(3)) is filled in with data retrieved automatically from Chapter 5. CZ therefore has to provide the requested information in the overview table. As information on your intention to use the flexibility provisions to transfer funds between the first and the second pillar is missing, it is not possible to assess the respect of the various ring-fencing requirements as those are calculated on allocations after possible transfers. Related comments are therefore not included at this stage.
173	R1	4	4.4.3	EAFRD technical assistance: the Czech authorities are asked to indicate a fixed percentage of the EAFRD allocation that they plan to reserve for technical assistance. This is not specified in section 4.4.3 (nor in other parts of the draft CAP strategic plan).
174	R1	4	4.5.2	CAP network: section 4.5.2 refers to a total amount of public expenditure of EUR 6 million for the period for the CAP network. From the explanations provided, it appears that this amount will be covered from EAFRD technical assistance. Please confirm or explain.
175	R1	5	5.2.2 5.2.3	Wine: reference is made to 5-year period. This is not correct. Under the CAP Strategic Plan, the allocation for wine covers 4 years (2024-2027). Please correct.
176	R1	5	5.2.4-9	Beekeeping: total planned amount exceeds beekeeping allocation.
177	R1	5	5.2.10	Potato sector (financed under “other sectors”): no allocation can be provided for FY 2023 and the allocation should be filled in for FY 2028.
178	R1	5	5.2.11	Laying hens: from which allocation is this financed? If under “other sectors” (to confirm), no allocation can be provided for FY 2023 and the allocation should be filled in for FY 2028.
179	R1	5	5.2.12	Ornamental sector: Under “other sectors”, no allocation can be provided for FY 2023 and the allocation should be filled in for FY 2028.
180	R1	5	5.3.1	ANC: no payments foreseen for FY2028-2029 (same comment for some other EAFRD sections)
181	R1	5	5.3.3	No breakdown of yearly payments is given, only total for the period. (same comment for some subsequent sections)
182	CL		General I.	• We appreciate that the draft CSP addresses numerous issues related to both climate change mitigation and adaptation. • Some strategic documents (both at the EU and at the national level) and their objectives are not fully taken into account in this CSP (e.g. EU Adaptation Strategy, EU Forest Strategy, EU Biodiversity Strategy, and Farm to Fork Strategy; the national Climate Change Adaptation Strategy and its Action Plan, etc.). Please consider making use of

				priorities, measures and implementation tools envisaged by these strategic documents to inspire your final touches on this draft CAP Strategic Plan (CSP)³ – in particular with regard to enhancing water retention capacity of soils by using nature-based solutions, contributing to resilient (mixed⁴, multigenerational, partly naturally recovered) forests, supporting farming and forestry practices, which contribute to climate change mitigation and adaptation, to a better quality of soils and to the protection of biodiversity, etc. • Carbon farming is not sufficiently targeted in the draft CSP. Given the potential of the Czech agricultural and forestry sectors to use carbon farming practices and their prospective contribution to both climate change mitigation and adaptation, please consider strengthening the carbon-farming elements of your intervention strategy. • Even if the need for the agricultural sector to adapt to the changing climate is recognized in the draft CSP, the climate change adaptation is under-represented throughout the draft document. Please consider adding further adaptation measures and in particular, increasing significantly the area on which climate change adaptation measures would be implemented. • Enhancing water retention potential of the soil should be in our view one of the principal objectives of this CSP, not only because of its importance for financial profitability of farms (reduction of costs for irrigation and fertilizers, conservation of the soil's value, etc.) but also as a climate change adaptation measure (besides others, to prevent floods and drought). As far as implementation is concerned, please consider giving a priority to nature-based solutions, specify which ones would be used and ensure an adequate financial allocation corresponding to the utmost importance of this priority. Please ensure that the measures proposed in this CSP do contribute to slowing down the water run-off or at least do not accelerate it. • The CSP has identified various climate-related weaknesses and threats, however, some of them have not been translated in needs, nor in intervention measures. Please consider translating the identified problems of both farming and forestry sectors to the needs and intervention measures (please see the detailed comments below). • Supporting forest owners/managers in maintaining aged trees in the forest (so-called proforestation) is a measure used by various EU Member States for both climate change mitigation (larger trees absorb more CO₂) and climate change adaptation (large trees retain substantial amounts of water, they are a source of seeds providing for natural regeneration (these trees are then more resilient), they provide for shadow for seedlings that cannot grow in areas fully exposed to sun, they contribute to the protection of biodiversity, etc.). Please consider motivating forest owners to let the trees grow old by adding proforestation among intervention measures envisaged. • The enhanced conditionality, intended to mainstream besides others climate change mitigation and adaptation in
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³ Including the strategic documents, which are about to be adopted: Communication on Carbon Farming and the EU Soil Strategy

⁴ Areas of a single species not exceeding 0.2ha.

				Member States' Strategic Plans, seems to be underused in this CSP. Please consider making more of a use of the enhanced conditionality for climate-related purposes (please see the section 3.5. of our comments for detailed recommendations) • Eco-schemes are in our view the key tool, which may help land managers find the balance between their incomes and farming/forestry, which are climate friendly and adapted to climate change. Based on our preliminary analysis, however, it seems that the proposed design of eco-schemes would not change much for eco-farmers as compared to the current CAP period nor it has a potential to motivate significant numbers of conventional farmers to turn to eco-farming and other climate-friendly practices. The eco-schemes, as defined in the draft CSP, are not very ambitious. Please consider making the eco-schemes more ambitious and at the same time an attractive tool for land managers to make their farming/forestry more climate-friendly and better adapted to climate change (please see the section 5 of our comments for detailed recommendations). • Numerous climate-related actions, which may at the same time improve economic and social situation of farmers, have not been envisaged in the draft CSP (please see the separate Table). Please consider adding some of these measures. • The draft CSP does not cover the issue of insurance of climate-related risks in agriculture / forestry (drought, floods, frost, heat waves, etc.), which are now difficult / impossible to be insured by insurance companies. Please add adequate intervention measure(s), which would enable farmers / foresters to access affordable insurance against climate-related risks. The EU Adaptation Strategy provides various sources of inspiration for such support measures. • Since the current version of the CSP does not provide budget for all interventions, it is impossible to calculate the budget allocated to the specific objectives 4, 5 and 6 as compared to the overall budget for the CSP. Please inform us about the ratio of funds devoted to climate-related specific objectives and if needed, please consider increasing the allocation accordingly (in addition to the ring-fencing envisaged in the draft CAP legislation). • When comparing future and current pillar 1 'green' investments, it seems that the budget envisaged for eco-schemes in the future programming period (2023-2027) is slightly inferior to the comparable expenditure in greening in the period 2014-2020 (please see the Table 2 for details). Given the 'green' ambition of the new CAP, please consider increasing the allocation devoted to future eco-schemes so that it is significantly higher than the one for greening in the current programming period (besides others to comply with no backsliding principle). • Czechia is the second Member State with regard to the share of the EU funds being used by big agricultural holdings in the current CAP period. At the same time, the studies show that these holdings apply mostly conventional farming and forestry methods while small and medium farmers and foresters tend to use more climate and environment friendly practices. Please consider strengthening the support to small and medium land managers (both farmers and foresters) as compared to big holdings.
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183	CL		General II.	• The SWOT and needs assessment sections in the CSP are not sufficiently detailed and should include more information from the background analysis, which has been carried out by the Ministry. The SWOT does not (sufficiently) address some key issues, including energy efficiency, forestry emissions, vulnerability of the crop sector to frost and heavy precipitation, etc. • While we believe that the ranking of needs was carried out by the Ministry, it has not been included in this draft of the CSP. • In contrast to EC Recommendations for Member States on their CAP Strategic Plans issued in December 2020, this draft CSP does not support, for instance, the following actions: low emission feeding strategy in livestock management, support of varieties and species more resilient to pests; some operations are described in a general way (for example support of investments helping to “reduce depth of tillage” could mean several different measures with diverse impacts), which in turn makes the assessment of their potential climate benefits problematic. • Several interventions are highly climate-relevant and promising, but their potential is unfortunately reduced by a small targeted area or by an insignificant budget envisaged; concrete examples include afforestation, introduction of agro-forestry, Art. 68: Investment support to technologies reducing GHG and NH₃, Art. 65: Agri-environment-climate commitments: intercropping support, conversion of arable land to grassland, organic farming, etc. • The current version of CAP SP does not contain finalized financial tables on intervention, objective and program level.
184	CL	2	2.1.4.1	<u>General comments:</u> • Overall, the SWOT is rather general on various issues, e.g. on GHG emissions and on climate change adaptation needs. At the same time, it should be noted, that background analysis document (which went through public consultation) contains in most cases exact arguments supported by time series of amounts of emissions, sequestration, etc. SWOT was apparently meant to summarise that, nevertheless, please add at least key data supporting the SWOT. • The following issues seem to be missing or not sufficiently addressed in the SWOT: • low water retention capacity of soils • low energy consumption efficiency in the agriculture sector, • sharp increase in GHG emissions from the forestry sector, • risk of negative impacts of climate change on water quality, and • vulnerability of agriculture to frost and to heavy rains (mentioned in EC Recommendations). Please, consider addressing these issues.

				<u>Specific comments:</u> • We welcome that the following issues have been identified among the weaknesses of the farming sector: - 'a high percentage of degraded soils (stiffening, erosion, etc.), - an absence of measures to restore water retention potential of soils, to restore optimal conditions on extremely solid soils (up to 55 % ZPF), and - large land under cultivation with a single crop increases the risk of soil erosion' • Furthermore, we welcome that the following issues have been identified among the weaknesses of the forestry sector: - 'inappropriate structure of the current tree composition of forest stands in relation to climate change and habitat conditions, - the use of inadequate mechanisation leads to a densification of forest soils, and - modern forestry practices reflecting adaptation to climate change are not fixed or often not known in operational practice' • Finally, we welcome that the following issues have been identified among the opportunities for the forestry sector: - 'in relation to climate change mitigation and adaptation, restoring forests (and in particular the salvage shavings produced in recent years) using natural rejuvenation and maintaining close-to-nature species and age compositions, the possibility of planting broadleaved trees and firs in spruce stands which are still alive and where they represent an inappropriate species composition.'
185	CL	2	2.1.4.2 2.1.4.3	Needs Key comments: • The above-mentioned weaknesses and opportunities are not fully reflected further in the document. Please consider translating them further (more in-depth and/or at a larger scale) in concrete needs and intervention measures. • Some of the needs are only vaguely defined, please consider formulating them more precisely so that the intervention measures could be then accurately defined. With regard to the need P4.04 'Ensure appropriate regeneration of forest stands taking into account climate change' - we welcome that it is envisaged to 'support the enhancement of the diversity of the species, age and spatial structure of forests to ensure the species stability of the forest' and that 'the measure also includes creating conditions for natural regeneration' (section 2.1.4.3.). Please make sure that the diversity of the species, age and spatial structure, and the natural regeneration are mentioned also in the description of the need in the section 2.1.4.2. Such forests are likely to be resilient to the impacts of climate change.

186	CL	2	2.1.4.4	Intervention Strategy Key comments: • Interventions envisaged respond mainly to climate change mitigation and less to adaptation. Please consider refining the intervention measures by adding new adaptation measures and enhancing the scale of already proposed adaptation measures. • Carbon farming is largely missing in the draft CSP. Given its potential in the Czech agriculture and its combined climate change mitigation and adaptation potential, please consider incorporating it in your intervention strategy. • Consider possible intervention in maintaining aged trees in the forest (so-called proforestation) as a measure used by various EU Member States for both climate change mitigation (larger trees absorb more CO₂) and climate change adaptation (larger trees retain substantial amounts of water, they are a source of seeds providing for natural regeneration, they provide for shadow for seedlings that cannot grow in areas fully exposed to sun, they contribute to the protection of biodiversity, etc.). Comments specific to the gaps, i.e. where identified needs are not (sufficiently) addressed by the proposed interventions (linked to the interventions specified in the draft CAP legislation): P4.01 Increase agriculture's resilience to climate change • The intervention is related only to a very small proportion of agricultural land (see below) – please consider enlarging the area significantly. P4.02 Reduction of GHG and ammonia emissions from agriculture • Art. 68 Non-productive investments to technologies decreasing emissions of GHG and NH₃ - the investments are targeted to climate-related issues but the description is not specific enough, hence the efficiency of the envisaged support cannot be assessed. Please specify the intervention measure considered. • Art. 68 Afforestation of agricultural land – planting of new forest – investment. + Art. 65: Afforestation of agricultural land - new forest management: the measures envisaged seem to be adequate to address the need, however, the envisaged acreage is very low – could the measure be improved? • Art 68: Establishing agroforestry systems - investment + Art. 65: New agroforestry systems -management. The measures envisaged have a significant potential to be efficient, however, the target envisaged is very low. Could the measure be improved? P4.04 Ensure appropriate regeneration of forest stands taking into account climate change
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				- Art. 68: Investments to renewal of damaged forests + Investments to protection of tree species which support forest resilience - ameliorating and stabilising species. Please ensure climate resilient forest stands, diverse in species, age, and leave sufficient space for natural regeneration. P4.05 Improve water protection functions of forest stands - Art. 68: Water management actions in forests - the measures envisaged seem to be adequate to address the need, however, the envisaged target is very low. Please consider increasing it significantly. P4.06 Secure and improve carbon sinks and soil storage - Art. 68 Afforestation of agricultural land – planting of new forest + Art. 65 Afforestation of agricultural land - new forest management - the measures envisaged seem to be adequate to address the need, however, the envisaged acreage is very low. Please consider enlarging the supported area. - Art 68: Investments to protection tree species, which support forest resilience - ameliorating, and stabilising species – please consider enhancing it (see above for details). - Art 28: The schemes for the climate and the environment, targeted to grasslands (permanent and on arable land). According to the draft CSP, permanent grassland areas may be ploughed, which would decrease carbon sinks. Please reconsider this provision. - Art. 28: The schemes for the climate and the environment - targeted to grassland, arable land, orchards, vineyards, hop fields, seedlings plots – whole farm approach. The scheme is not really ambitious – please consider making it more ambitious in terms of carbon sequestration and storage in the soil.
187	CL	2	2.1.4.6	Selection of the result indicator(s) - R.12 Adaptation to climate change: Share of agricultural land under commitments to improve climate adaptation – target value is only 0.02% - please consider increasing this target significantly. - R.16 Climate-related investments: Share of farms supported by CAP investments contributing to climate change and production of RES or biomaterials – target value is only 10% - please consider increasing this target. - R.26 Investments related to the environment: Share of farmers benefiting from support for productive and non-productive CAP investments related to the management of natural resources - target value is only 2.45% - please consider increasing this target. R.30 Protection of forest ecosystems: Share of forest land under management commitments to support landscape, biodiversity and ecosystem services - target value is only 0.85% - please consider enhancing this target.
188	CL	2	2.1.5	Key comment:

				• We welcome in particular the identified need P5.02 to ‘Increase water retention in the landscape and improve groundwater and surface water quality’. It is rightly mentioned that ‘there is a need to promote farming methods on agricultural land that enhance the retention capacity of the countryside and thus prevent water scarcity in periods with lower rainfall, as well as reduce the damage caused by floods.’ Please specify the kinds of farming methods, which will be used for this purpose, while focusing on nature-based solutions.⁵ • We believe that enhancing water retention capacity of the agricultural soil is a key pre-condition for: - enhancing farmers’ yields and income (e.g. enhanced organic matter results in a more fertile soil) - reducing the costs (for irrigation, fertilizers, pesticides, etc.) - prevention of droughts, floods, etc. Given the importance of water retention and the fact that it has been to a large extent neglected so far, please consider increasing the financial allocation envisaged for this priority.
189	CL	3	3.2	We are not sure how the priorities of some of the key documents have been taken into account. Please ensure that the CSP is fully in line with the national Climate Change Adaptation Strategy and its action plan as well as with the key EU Strategic documents (besides others the EU Adaptation Strategy, the EU Biodiversity Strategy, the EU Forest Strategy and the Farm to Fork Strategy), in particular with regard to: - enhancing water retention capacity of the landscape by using nature-based solutions, - contributing to resilient (mixed, multigenerational, partly naturally regenerated) forests and their capacity to provide ecosystem services, and - supporting agricultural practices, which contribute to climate change mitigation and adaptation, better quality of soils and to the protection of biodiversity.
190	CL	3	3.5.1 3.5.2 3.5.3 3.5.4	Conditionality GAEC1: : Maintenance of permanent grassland Please ensure that this GAEC is efficiently used to the extent possible not only for carbon sequestration but also for climate change adaptation and other non-productive uses (e.g. slowing down the water run-off, protection of biodiversity (including in soils), etc.) GAEC2: Protection of wetlands and peatlands The methodology for delimitation of wetlands and peatlands seems not yet available according to the draft CSP. Please ensure that it would be finalized at your earliest convenience.

⁵ For example, enhancing landscape features (balks, hedges, bushes, lines of trees, etc.), enhancing organic content in the soils, revitalisation of water streams, creation of small ponds, organic farming, discarding drainage infrastructure, reduction/no tillage, agroforestry, etc.

				GAEC4: Establishment of buffer strips along water courses The buffer strips are of an utmost importance, not only because of the protection of water streams against pollution but also for slowing down the water run-off, protection of biodiversity, protection against floods, etc. Please consider widening these buffer strips as compared to the width proposed in the draft CSP. GAEC6: Tillage management, reducing the risk of soil degradation and erosion, including consideration of the slope gradient. A significant share of agricultural land in Czechia is endangered by water and/or wind erosion. Please consider using this GAEC to motivate farmers to reduce tillage, to carry out all the heavy mechanics travels along contour lines, and to use all the anti-erosion measures (both against water and wind erosion), going beyond the requirements of the national anti-erosion legislation. GAEC7: Minimum soil cover to avoid bare soil in periods that are most sensitive Please ensure that this GAEC is efficiently used to protect the soils against water and wind erosion but also to maintain organic content, carbon and biodiversity in the soils. GAEC8: Crop rotation in arable land, except for crops growing under water This GAEC (both 8a and 8b) is of an utmost importance for climate change adaptation, since it helps enhance organic content and minerals in the soils and slow down the water run-off. As a result, it helps prevent erosion, floods, droughts, etc. Please ensure that this GAEC is efficiently used, i.e. please consider taking out / minimizing the exceptions (envisaged for crop rotation...), and consider conditioning the support by limiting the single-crop area to significantly less than what is envisaged by the national law (currently 30ha), depending on inclination and other factors. GAEC 9: Minimum share of agricultural area devoted to non-productive areas or features This GAEC may be efficiently used to enhance the water retention potential of the landscape by creating landscape features such as baulks, hedges, bushes, lines of trees, etc., revitalisation of water streams, creation of small ponds, discarding field drainage infrastructure (meliorace), etc. Please ensure that the land managers are encouraged to set up permanent landscape features and consider making this draft CSP more ambitious so that it can significantly contribute to achieving the overall target of 10% of land used for non-productive purposes by 2030.
191	CL	4	4.8.1	List of ineligible expenditure

				Please consider making second-hand movable property an eligible expenditure. We believe it would encourage both farmers and foresters to contribute to the circular economy (a priority on the EU level).
192	CL	5	5.1.3	Complementary income support for young farmers Young farmers are expected to bring in fresh thinking in terms of agricultural practices that, while being profitable, help mitigate and adapt to climate change. Therefore, supporting young farmers is also important from climate point of view. In this context, we are not sure about the proposed transfer of 2,5 % to Pillar II. as young farmers may not be willing to request more demanding investment funding.
193	CL	5	5.1.5	Schemes for the climate and the environment – CAP-wide eco-payment We welcome the concept of a farm-wide eco-payment. Nevertheless, from the information available and the way it is designed, we are not sure whether it would help enhance environment/climate friendliness of farming. Please ensure that the scheme is really motivational for land managers to turn their conventional farming to a farming, which is both climate friendly and adapted to climate change. You may like to get inspired by other EU Member States that use this opportunity to significantly reduce the share of conventional farming. Permanent grassland crop (T) The requirements and conditions for this culture are not clear in this draft CSP. Please consider refining it. Standard arable land culture (R) Please consider making the requirements more ambitious, besides others in terms of crop diversification (the conditions of this eco-payment should take into account, besides others, whether crops concerned improve or deteriorate the soils)
194	CL	5	5.1.15	Payment for small farmers Czechia ranks the second among the EU Member States when it comes to the share of the EU funds that have been granted to big agricultural holdings in the current CAP period. At the same time, the studies show that these holdings apply mostly conventional farming and forestry practices while small and medium farmers and foresters tend to use more climate and environment friendly practices. Please ensure that the share of the support to small and medium land managers (both farmers and foresters) is significantly enhanced as compared to the previous period.
195	CL	5	5.3.3	Investment in agricultural holdings Soil compacted by heavy machinery is one of the causes for a fast water run-off, resulting besides others in floods and subsequent draughts. Most of the agricultural practices, which are both climate friendly and adapted to climate change (e.g. agroforestry, regeneration farming, etc.), require smaller and lighter machinery. Please consider encouraging the farmers to purchase the equipment suitable for a farming, which is both environment/climate friendly and adapted to climate change.

196	CL	5	5.3.4	Investments in the processing of agricultural products The draft CSP mentions that ‘...this aid intensity may be increased by 10 % for young farmers and 10 % for small enterprises’. Please consider granting the same bonus of 10% also to organic farmers since this may help significantly increase the organic production.
197	CL	5	5.3.8	Investments in forestry infrastructure Please make sure that the roads should also contribute to reducing soil erosion and do not accelerate water run-off from forests.
198	CL	5	5.3.10 5.3.11	Afforestation of agricultural land: establishment Afforestation of agricultural land – management of established cover This intervention has a great potential in terms of both climate change mitigation and adaptation. Nevertheless, its impact would depend on its location and on the size of the area concerned. Please ensure that locations for this intervention are carefully selected and consider enlarging significantly the overall area envisaged for this intervention (which is negligible in the current draft).
199	CL	5	5.3.12 5.3.13	Establishment of an agroforestry system Management of an established agroforestry system This intervention has a great potential in terms of climate change mitigation and adaptation. Studies from various EU regions show that the yields from a given plot of land increase, even if a part of the land is occupied by trees, since trees help enhance edaphon and organic content in the soil, enhance water retention capacity, provide shadow. As a result, less/no pesticides nor fertilizers have to be used, less/no water is needed for irrigation, etc. Nevertheless, the impact of this intervention would depend on how it is going to be realized, and on the size of the area on which it is going to be implemented. Please ensure that the tree lines are planted along the contour lines and consider enlarging the overall area envisaged for this intervention (which is currently negligible).
200	CL	5	5.3.14	Investments in rehabilitating calamity areas Dead wood does not have to be removed from calamity areas (advantages of retaining the dead wood in the forest clearly prevail from both environmental (biodiversity and soil protection, water retention, etc.) and climate (both mitigation and adaptation) point of view. If the dead wood is being removed, it must be ensured that the soil is not damaged by heavy mechanics. Please consider supporting also forest owners, who leave the dead wood behind and/or allow full natural regeneration of the calamity area (such trees are then more resilient to both weather extremes and pests). If artificial rehabilitation is to be carried out, then we suggest to follow the recent recommendation of the European Forest Institute for bark-beetle calamity areas in Central Europe – that is to carry out artificial rehabilitation on max. 50% of the calamity area while leaving the rest of the area for natural regeneration or artificial regeneration at a later stage. The

				objective is to ensure that the forests are mixed, multigenerational and partly naturally regenerated, i.e. resilient. Please consider using principles similar to those described above for rehabilitating calamity areas.
201	CL	5	5.3.15	5.3.15. Investments in the protection of amelioration and stabilisation species Please consider supporting planting the amelioration and stabilisation species also in areas with unstable forestry stands (e.g. spruce monocultures).
202	CL	5	5.3.16	Water management measures in forests It is important that all the proposed measures contribute to slowing down the water run-off. However, some of the measures proposed may on contrary speed up the water run-off (like increasing the run-off capacity of water streams). Please ensure that all the measures proposed indeed contribute to slowing down the water run-off.
203	CL	5	5.3.19	Organic Farming This is clearly one of the key interventions in the farming sector in terms of both climate change mitigation and adaptation. The objective of the EU, set up in the Farm to Fork strategy, is to reach at least 25% of the EU's agricultural land under organic farming by 2030. The draft CSP sets a goal for organic farming in Czechia on 21% by 2027, which is broadly in-line with this objective. We see organic farming as an opportunity to produce healthy food in a climate/environment-friendly manner, while ensuring an adequate income for farmers. It is of utmost importance that the conditions of the support available to organic farmers are more favourable as compared to conventional farmers. Please ensure that the conditions set up by this CSP motivate farmers to remain / become organic. Please consider enhancing the allocation for this intervention.
204	CL	5	5.3.20	Land consolidation We appreciate that the 'Priority will be given to land consolidation in areas at risk of climate change, in particular towards areas at risk of water erosion and non-forested areas with a high risk of accelerated run-off.' Please ensure that slowing down / not accelerating the water run-off is among the key selection criteria for the support under this intervention and that preference is given to nature-based solutions.
205	CL	5	5.3.38	Support for advice Farmers and foresters have to face climate conditions, which are different from those known by their ancestors. Traditional farming practices may therefore cease to function. Please consider providing farmers and foresters with rapid and precise information (e.g. weather forecasts for their particular land) as well as with models on the likely climatic conditions in their regions in several decades (including, for instance, tree species that would be suitable for climatic conditions in a given location in 50 years), so that they can take informed decisions today. Please consider enabling the use of farming plans for the protection of biodiversity also outside of protected areas.

206	EN	2	2.1	General comment, possible to mention/add in the document CZ and its CA (competent authorities): can apply BAT Conclusions including BAT-AELs in an ambitious manner not only in terms of preventing, and where not feasible reducing, pollutants from installations (e.g. ammonia) but also in terms of manure landspreading, on farm processing manure, slurry storage or water and energy efficiency.
207	EN	2	2.1	On Need P4.02, “reduce GHG and ammonia emissions” – full support for the inclusion, propose to note that this would also contribute to SO5. If SO5 not added here, then please add a pollution-relevant entry also for SO5 in this table (currently missing). On Need P4.03 “Use the available biomass potential”: please note that any promotion of biomass combustion must be accompanied by sufficient safeguards to avoid any negative air quality impact (notably particulate matter emissions).
208	EN	2	2.1	P5.02 formulates the need to increase water retention in the landscape and improve groundwater and surface water quality. However, the description of the need fails to acknowledge the significant scale of nutrient pollution, regional hotspots (increasing NO₃ concentrations in the Elbe and Ohře river valleys, and in the South Moravian region) and the treats posed to the environmental status of the Baltic Sea
209	EN	2	2.1	P5.01 focuses on soil erosion and loss of SOM but fails to address other significant soil threats such as compaction (a threat to 49% of agricultural land) other than in an AECM measure on Intercropping and an increasing trend of acidification.
210	EN	2	2.1.4.1	On p.47, Strengths: please note that the strength “processing and energy use of biomass” can also be a <i>weakness/threat</i> for SO5 if referring to biomass combustion (wood burning etc). Any promotion of biomass combustion must be accompanied by sufficient safeguards to avoid any negative air quality impact (notably particulate matter emissions). (N.b. it looks like the main intention is to use biomass combustion for district heating which generally gives much better opportunities for reducing emissions, but would be good to clarify / reassure about this)
211	EN	2	2.1.4.1	In relation to biomass, under the RRP there is a need to prepare <i>an assessment of the trajectories of sustainable use of bioenergy and supply of biomass in Czechia and its impacts on the Land Use, Land-Use Change and Forestry sinks and biodiversity as well as impact on air quality for period 2020-2030</i>. This should be used to inform any plans or investments relating to biomass under CAP. In addition, the RRP contains a specific condition for investments in biomass “<i>In case biomass is utilised as a fuel source, the investment shall be in line with the sustainability and the greenhouse gas saving criteria as set out in Article 29 of Directive 2018/2001 on the promotion of the use of energy from renewable sources (‘the Renewable Energy Directive’, ‘RED II’). Only biomass waste and residues that can be extracted in a sustainable manner shall be used and the investment shall be accompanied by emission-reducing measures.</i>” For consistency, this should be carried over to the CSP.
212	EN	2	2.1.4.1	Organic farming is listed as a strength within the SWOT for SO4 and SO6 however, OF is listed as an intervention under SO 5. The link between both is unclear.

213	EN	2	2.1.4.6	R.14 Carbon storage in soil and biomass: Share of agricultural land under commitments to reducing emissions, maintaining and/or enhancing carbon storage (permanent grassland, agricultural land in peatland, forest, etc.). The proposed target is 29.47%. The authorities should consider increasing the target value given the scale of the problem with low carbon content and erosion in the country (Mean SOM in arable land is 20.6 g per kg (2015), compared to 43.1 g per kg for EU-28).
214	EN	2	2.1.4.6	The target values under R17 and R.30 should be reconsidered bearing in mind the growing threats to forestry in Czechia.
215	EN	2	2.1.4.6	Should also refer to R.13, R.19/R.20 on ammonia emission reductions to match the description of P4.02.
216	EN	2	2.1.4.6	Bearing in mind the growing threats to forestry in Czechia, further support and promotion of sustainable forestry should be considered by authorities which would contribute to an increase in the proposed target values under R17 and R.30. This could be done through AECM for landscape features to promote planting of small wooded areas or implementation of agroforestry.
217	EN	2	2.1.5	The whole SO5 discussion seems to lack air pollution references and the need to tackle nitrogen pollution (in an integrated approach air-water-soil). This specific objective should be better addressed with a broader field of action.
218	EN	2	2.1.5	Diffuse agricultural pollution which leads to eutrophication in surface waters should be included as a weakness.
219	EN	2	2.1.5.1	It mentions existence of legislation for protection of waters but does not include the Water Framework Directive in this list
220	EN	2	2.1.5.1	In threats it should include the threat of not achieving the objectives of the Water Framework Directive
221	EN	2	2.1.5.2	On the need P5.02 please also add the need to implement agricultural measures to improve water status under the WFD as agriculture is the 3 rd top pressure affecting surface waters and is the top pressure on groundwater
222	EN	2	2.1.5.2	Based on threats and weaknesses highlighted in the SWOT, the authorities should consider splitting P5.02 into two separate needs. One dealing with water quantity and availability through nature-based solutions and a second dealing with water quality.
223	EN	2	2.1.5.2	Possibly a result of translation but can authorities confirm that P5.01 is protection and improvement of the <u>soil</u> quality of agricultural land.
224	EN	2	2.1.5.6	The results indicators for reduced ammonia emissions would be relevant to apply within the selection
225	EN	2	2.1.5.6	R.21 proposes that 23.49% of agricultural land should be under commitments for water quality. Give the high percentage of surface and groundwater bodies in less than good chemical status with significant diffuse pollution from agriculture (55%, and 84% respectively), the targeted area seems to be insufficient to ensure that the Green Deal targets is met. Nitrogen fertilizer consumption and phosphorus fertiliser consumption are very high compared to the EU average. This means that a reduction in this area should probably target a higher share of the UAA.
226	EN	2	2.1.6	Identification of needs: Need not only to maintain (protect) but also to restore the favourable conservation status of the relevant habitat types and of habitats of relevant species could be highlighted.
227	EN	2	2.1.6.1	SWOT analysis – weaknesses: Attention should be paid also to the conservation status of relevant habitat types, which are protected under EU legislation (as listed in the Priority Action Framework for Natura 2000 in the Czech Republic 2021 –

				2027). Many of these habitat types present in the Czech Republic are in an unfavourable conservation status, some of them further deteriorating. The issue of invasive alien species is not mentioned. 12 out of 37 IAS on the EU list have been detected at the CZ territory. In relation to agriculture, <i>Heracleum mantegazzianum</i> is a plant species posing a big threat to grassland plots locally, making them unusable for pasture.
228	EN	2	2.1.6.1	Can the authorities provide further information on what is envisaged from the Opportunity “The potential of farms in pharmacies and therapeutic activities”
229	EN	2	2.1.6.6	The CAP SP includes indicator R.34: Share of agriculture land under commitments for managing landscape features, including hedgerows but no explicit reference is made to “high biodiversity” Currently, high diversity landscape features cover only 0.8% of the UAA. The target value proposed for indicator R.29 is 211037 ha for 2023-2025 (approx. 6% of the UAA) and 224460 ha for 2026 + 2027: (approx. 7% UAA). If these values represent individual targets per period, the MS will achieve in meeting the Green Deal target. If, however, the 7% planned to be under commitments by 2026 represent the total area targeted, the MS may fall short of the Green Deal target. To be verified what exactly covers area of 224 ths. ha.
230	EN	3	3.2.1	GAEC 4: In NVZ, the NAP establishes “for agricultural parcels with a slope exceeding 7 degrees, a buffer of at least 25 m width from the bank line shall be maintained...” instead of “12 m to 25 m depending on the boundary of the part of the land block from the bank line...”. The reason is explained in page 119: “<i>In contrast to the strips of the Nitrates Directive, where strips are fixed in conjunction with the bank line, in order to simplify the procedure for agricultural practice, the attachment of the buffer strip to the boundary of a part of the land parcel has been introduced if that boundary is situated at a defined distance from the watercourse</i>”. We are unclear (possibly as a result of machine translation) how the authorities plan to implement a deviation from 25 m as required within NVZ under the NAP here. Clarification on the implementation of GAEC 4 (b) for land on slope >7° is required.
231	EN	3	3.2.1, 3.2.2	In relation to SMR3 and SMR4, please specify, how they contribute to the target and that they ensure a link to the compliance with the conditions for protection of habitats and species under the Directives.
232	EN	3	3.2.2	Objective 4; GAEC 10 may also be considered here
233	EN	3	3.2.3	This section only provides explanation per SOs not individual measures, and it is thus often unclear how the increased level of ambition is to be achieved per measure and although it is clearly stated next to each measure that meeting baseline requirements is mandatory for obtaining support under Pillar II, it is often unclear how is this to be achieved. The authorities must elaborate on the measures to clearly show how the measures deliver beyond the baseline and express how the measures increase ambition compared to the current programming period.
234	EN	3	3.2.4	It mentions measures under the river basin management plan but can it please clarify if they mean the 2 nd or 3 rd plan here as the 3 rd plan is being developed and due for submission at the end of 2021 and this it is the 3 rd plan that should be

				included here
235	EN	3	3.2.4	Please explain how grassing along a watercourse goes beyond requirements of GAEC 4 – more detail needed
236	EN	3	3.5.1.1	No more than 0.1ha per part of land parcel can be converted from permanent pasture without authorisation. Is this per year or over the programming period?
237	EN	3	3.5.1.1	The authorisation criteria for conversion are provided but does the beneficiary have to formally apply to the relevant authority for approval of conversion?
238	EN	3	3.5.1.1	The reference date is 2018. Is there more recent data available for the reference %?
239	EN	3	3.5.1.2	GAEC 2: The authorities propose a deferral to 2025. Is there a possibility to implement this GAEC, at least in part, earlier? Datasets such as Wetlands database compiled by the Nature Conservation Agency of the Czech Republic could be used to inform this. Also, more information should be provided on the territorial scope.
240	EN	3	3.5.2.1	Under option (b) exclusion of pesticides is held in brackets. Can the authorities confirm whether pesticide use will also be excluded under this option.
241	EN	3	3.5.3.2	Can the authorities confirm if it is intended to only apply GAEC 7 on areas where slope is 4° or greater?
242	EN	3	3.5.3.3	GAEC 8; We understand the authorities propose 2 options for GAEC 8, it is unclear how a and b options integrate.
243	EN	3	3.5.4.2	GAEC 10: An ambitious implementation of this condition banning conversion of grassland in all Natura 2000 sites is desirable and welcome. Please, specify if the 0,1 ha limit of change in culture or ploughing applies per year or over the programming period. Please, also note that any change in culture or ploughing needs to be in line with Article 6(2) of the Habitats Directive.
244	EN	5	General	The Commission wants to highlight that the EU Forest Strategy is calling for the promotion of payment of ecosystem services through the CAP and this should be highlighted to Czechia. Also as a possible option for state-aid.
245	EN	5	General	Interventions: A comprehensive list of relevant interventions is contained in the Prioritised Action Framework for Natura 2000 in the Czech Republic 2021 – 2027 (PAF). The PAF indicates that many of these measures may be co-funded from the CAP. However, the Strategic plan does not seem to directly follow the PAF – how is the coherence with the PAF going to be ensured? The Czech Republic might also reconsider the possibility to fund some of the measures related to Natura 2000 through a special ecoscheme, which would be compatible with the relevant intervention under II. Pillar (chapter 5.3.2).
246	EN	5	5.1.4	Could you specify what is meant by “minimum maintenance of permanent grassland”?
247	EN	5	5.1.4	Can the authorities please provide explanation for the eligibility criteria relating to fertilisation. It is a mandatory requirement for beneficiaries to fertilise in compliance with the Nitrates Directive (as specified in SMR 2). The ecoscheme should go beyond the baseline requirements.
248	EN	5	5.1.5	It seems that this ecoscheme will have close to zero added value, as it is unclear whether it will bring any change in practices on the ground. Its ambition needs to be increased considerably.

				- For arable land, the requirements of this ecoscheme do not seem to have a high value added. There are crop diversification requirements that are basically the same as those currently in place for greening. There are also requirements with respect to sustainable management of organic matter in 35% of the area. Does this mean that organic matter can be managed in an unsustainable way in the remaining 65%? - The requirements for orchards and vineyards (green cover in each third line) and a max of four herbicide applications per year also do seem very weak. - For hop the requirement is a sustainable management of organic matter in 30% of the area. Does this mean that organic matter can be managed in an unsustainable way in the remaining 70%? - For skolky (tree nurseries?) the requirement max of four herbicide applications per year also do seem very weak.
249	EN	5	5.1.5	In relation to biodiversity, the conditions of this ecoscheme don't seem to go much over the baseline of conditionality. More ambitious conditions could be introduced at the level of an ecoscheme. In relation to non-productive areas, it is not clear, how is this intervention goes beyond GAEC 9. Can you specify the share of non-productive areas to be achieved under this ecoscheme? Can you specify what is meant by the "requirements for such areas"? (There seems to be something missing in the text of chapter 5.1.5 in relation to non-productive areas – on other places of the Strategic plan it is mentioned that the non-productive areas are to be increased - probably under this ecoscheme (?) - to 8 % (2023-2025) and then to 9 % (2026-2027).) Fast growing tree species –“Certain minimum surface area” and “specified crops” should be specified.
250	EN	5	5.1.5	There are obligations for the activities that go beyond conditionality but information for some sub-measures is missing. In these cases it is unclear whether the sub-measures deliver beyond the GAEC standards. The authorities should clarify the conditions of all sub-measures. For example, for interventions 1 and 4, no detail is presented on the requirement or eligibility conditions.
251	EN	5	5.1.5	On the whole farm eco-scheme– this could include more specific measures for water and then include the result indicator on water – diffuse ag is the biggest pressure on groundwater and 3rd biggest pressure on surface water and even the CAP recommendations include ‘improving groundwater and surface water quality’ . Same comment for All-fare eco-payment. Under permanent culture Sad, Vinice, hop plant crop and other culture, it says it addresses water retention in the landscape – please specify what this water retention in the landscape means – also if this measure is addressing water quantity then should there be a water quantity result indicator associated?

252	EN	5	5.1.5	Within the whole farm ecoscheme, we acknowledge the support for non-productive features. However, no target % cover is set at farm or national level. Therefore, we cannot assess the ambition of this measure in relation to the 10 % target included in the EU Biodiversity Strategy. The importance of having a higher share of non-productive areas and especially landscape features in the Czech Republic is clearly identified in chapter 2.1.6 of the Strategic plan (SWOT analysis, identification of needs - SO6). Please, reconsider the level of ambition.
253	EN	5	5.2.5.5	Waste water treatment facilities are mentioned –does this include reuse of treated waste water for irrigation? And if so it must be in line with the Water Reuse Regulation
254	EN	5	5.2.10	Improving water use and management, including water saving and drainage is mentioned but gives no further detail – could further detail on this please be provided.
255	EN	5	5.3	Several of the measures supported through EAFRD are described in a similar way to the current programming period, have similar eligibility conditions, design and target beneficiaries. The structure, funding and design of measures are very similar to the current period and are lacking elements showing how the interventions will make it possible to reach targets. Therefore, the requirement to show increased ambition is not evident and the authorities are required to expand on the scope or revise the design of the interventions.
256	EN	5	5.3.2	This intervention serves as a compensation for the limitations of farming on grasslands in Natura 2000 sites and as a protection against abandonment of the agricultural land. It only requires the applicant to “properly farm” the area. Would it be possible to further clarify, what is meant by “proper farming”? Farming in the sites should correspond to their management plans (- souhrny doporučených opatření).
257	EN	5	5.3.2.1	Please make sure that there is consistency between the individual titles under this intervention and the interventions anticipated by the PAF. Could you also explain, what is meant by “designated valuable habitats in the open air” (or how is this valuable habitat going to be designated)?
258	EN	5	5.3.7	Under project C for investments in forestry it states ‘need to increase the surface area of forest nurseries under irrigation and ensure a sufficient source of high-quality irrigation water’ – is this measure providing investment for irrigation? increasing the irrigated area can not be done in areas of less than good status and any investments in irrigation must comply with the requirements under Article 68(a) on investments in irrigation
259	EN	5	5.3.7	As a result of negotiations under RRP, the following conditions has been included for forest investments which should also be considered for CAP: an Amendment to the ministerial decree on forest management planning, which shall specifically pave the way for multigenerational, multispecies and resilient forests, shall be adopted by Q2023 <i>The reforestation shall aim to ensure multigenerational, multispecies forest with regard to spatial composition which are managed according to a continuous cover forestry approach. Even-aged monospecific forests shall be replaced by more biodiverse ecosystems, restricting the use of clear-cutting to cases where it is needed to ensure forest health and effective</i>

				<i>regeneration, and limiting the size of the clear cut area as much as possible.</i> <i>Native tree species shall be used, unless it can be demonstrated that they are no longer adapted to projected climatic and pedo-hydrological conditions. Also, admixtures of not more than 25% of Douglas fir in mixed stands shall be accepted</i> <i>• where allowed by national legislation</i> <i>• excluding Natura 2000 and other protected areas</i> <i>• and if the suitability of Douglas fir for the projected climatic conditions of the site of reforestation can be demonstrated</i>
260	EN	5	5.3.9	Corresponding SOs should also include SO5 (ammonia/clean air relevance). Results indicators for ammonia reduction should be added. In the “Description of the proposed intervention”, it would be relevant to mention that this action should also contribute to the objectives of Directive (EU) 2016/2284 on national emission reduction commitments; aiming to go <i>beyond</i> the mandatory ammonia reduction levels under this directive.
261	EN	5	5.3.11	For afforestation national legislation decides which species can be planted. Could Czechia confirm how they deal with non-native species and especially what is the procedure for introducing non-native species and if this includes a risk-assessment on the impact on biodiversity
262	EN	5	5.3.16	Please specify what is meant by water retention measures in the landscape – is this natural soil water retention measures or water storage? This is a measure on water management but there is no result indicator for water.
263	EN	5	5.3.17	Please specify what is meant by water retention measures here and please explain ‘grassing along a watercourse’ and explain how this goes beyond GAEC 4.
264	EN	5	5.3.19	We welcome the proposed target of 21% UAA managed through Organic farming. This will be a marked increase from the current cover of 15% (approx.) Do the authorities propose other measures, nationally or otherwise, to incentivise increased support for OF beyond the financial proposals presented in the draft which would help to reach the proposed target, for example increasing consumer awareness or procurement criteria?
265	EN	5	5.3.20	The description of this measure on land consolidation includes a lot on water, water erosion, loss of soils to water causing pollution and the water management function of reservoirs and beds of water course – not sure what is meant by beds of watercourse or if it is just referring to watercourses – should there be a result indicator for water for this measure? And this measure also mentions water retention in the landscape but doesn’t provide detail so same comments as above.
266	EN	5	5.3.33	Description says effective, direct or indirect regulation of the use of the most problematic PPPs..... – what is meant by indirect regulation?
267	EN	5	5.3.33	Can the authorities consider expanding this intervention to incorporate the promotion and use of non-chemical integrated pest management techniques?
268	EN	5	5.3.40	The draft text provides context of what type of interventions are of particular interest for forest within EIPs however the same information is not presented for farming practices. The authorities are reminded that the EIP intervention can provide opportunities to explore the application of farming activities beneficial for climate and environment particularly for target

				habitat and species or abiotic elements of concern.
269	EN	5	5.1.5	Based on our calculations, the allocations indicated for the eco-schemes amounts to approximately 1.215 billion for the 2023-27 period. Greening under Pillar I during the 2015-2019 period amounted to approx. 1.254 billion. Whilst a direct comparison cannot be made due to the structure of the new Green Architecture, we find this problematic as it does not display increased ambition as required for the post-2020 period. The eco-scheme financing as currently proposed represents 16% of the Pillar 1 funding which does not meet the ring-fencing requirements under pillar I. The authorities are requested to clarify their financial planning including the provision of financial tables which are omitted at present.
270	EN	5	Irrigation General 5.1.6	Irrigation investments are proposed for some investments in the draft CSP. It should be noted that CZ water bodies are not in all cases compliant with WFD objective of achieving good ecological status. CZ is vulnerable to water stress, with a water exploitation index close to the critical level of 20% with some river basins reporting significant pressures from abstraction. Further to this, CZ has a number of groundwater bodies failing to achieve good chemical status in respect to pollution. Any increases in irrigation may cause significant negative impacts on already stressed water resources. Any expansion of existing irrigation system including through increased use i.e. not only physical expansion and even through more efficient methods, is not supported where concerned waterbodies (surface or ground waters) are, or projected in the context of intensifying climate change to be in less than good status or potential. CZ should confirm that irrigation is not part of CAP plan.
271	EN	6	6.1	The individual targets should be consistent with the targets in the PAF, e.g. for recurring measures (agri-environmental / ecoschemes) in Natura 2000, there is a target of about 55 949 ha in the PAF.
272	EN	6	6.1	This shows that result indicator 21 on water quality is only in 3 measures and that R.22 on sustainable nutrient management is not used in any measure and this really should be – CAP recommendation provided as follows and shows this should be included: ‘Promoting the development of agricultural practices that limit substantially NH3 emissions from agriculture and that improve the management of nitrogen fertilizers and organic manures, including in view of improving groundwater and surface water quality and thereby contributing to the EU Green Deal target on nutrient losses.’ Also R.23 on sustainable water use not used at all even though several measures talk about ‘water retention in the landscape’ and abstraction is an issue in Czechia in some RBDs (e.g. Danube, Elbe)
273	EN	6	6.1	p. 466-467: why not apply R13 or R20? They would be highly relevant indicators to notably P4.02 under SO4 and SO5.
274	EN	6	6.2	As financial tables are missing, please consider how are the targets in PAF going to be covered, e.g. estimated EU co-funding of up to 58 989 616 € (28 211 264 € in Natura 2000 and 30 778 352 € outside Natura 2000) for which funding from the CAP

				is being proposed in the PAF.
275	EN	6	6.2	The draft CSP does not provide an overview of the financial plan, an overall budget per fund or annual allocations for all interventions. Notably, annual allocations are not available for all rural development interventions making it impossible to assess the overall EAFRD budget and its ring-fencing for environmental objectives. It is not sufficient to refer the reader to sub-tables in Section 5 to infer the financial planning for the coming CAP programming period. The authorities must provide clear information on the financial programming for the 2023 to 2029 period.
276	SA	5	General	<u>Pesticides:</u> <u>The SWD on CAP recommendations to Czechia:</u> • <i>Contributing to the EU Green Deal targets on pesticides</i> by strengthening the efforts to decrease the quantities and risks of most hazardous used pesticides and promoting the sustainable use of pesticides, in particular by ensuring the uptake of integrated pest management practices. In addition, the following recommendations are considered as contributing to the achievement of our overall objective of reducing pesticides: • <i>Strengthening the competitive position of the agri-food sector by improving the access to land and support processing and marketing of agricultural products with high added value (for example organic products or under EU and national quality schemes) and encouraging producer groups and co-operatives to seek recognition in sectors where there are currently no recognized producer groups established. In doing so it will be important to ensure synergies with other EU and national funds.</i> • <i>Contributing to the EU Green Deal target on organic farming</i> by accelerating the conversion of conventional farming to organic through adequate conversion and maintenance schemes. • <i>Contributing to resilient farming systems, in particular by using varieties and species more resilient to pests, by using risk management tools such as crop insurance and by increasing the organic matter in soils (retaining crop residues on fields, mulching, ridge and furrow, an appropriate timing of field operations to avoid soil compaction, etc.) to protect the soil from erosion and to retain water in soils.</i>
277	SA	5	General	<u>SANTE assessment on pesticides:</u>

				• There are no references to trends from the Harmonised Risk Indicator 1. • There are no references to reducing use of PPPs containing “candidates for substitution” or the “more hazardous substances”. • We acknowledge one of the schemes proposed highlights 8 active substances for elimination or reduction. • There is no mention of the general principles of IPM or crop specific guidelines/standards. • There are multiple references to AEKO-integrated production, however, uptake remains quite limited. • We acknowledge organic production is increasing annually and further expansion is targeted. • New schemes and agri-environmental measures are proposed and summarised, but it is not evident how they will contribute to meeting the F2F pesticide targets. • There is a target value for result indicator R.24 (sustainable use of pesticides) of 23.87% UAA inclusion in AEKO schemes which will contribute to development of a more sustainable use of pesticides and will have an impact on PPP use and risk reduction. However, the narrative around the target figure does not include what PPP use and risk reductions are actually expected or foreseen. There is no specific target of impacts of such measures and there is no specific PPP reduction target (either in use terms or risk terms). Consequently, if a large portion of the target area referenced (23.87%) is achieved in one year, there is no commensurate figure of expected pesticide use or risk reduction, with which to assess the level of success of the measure. Therefore, surface area percentage in a particular scheme may not a suitable metric on which to gauge success or failure.
278	SA	5	General	The Commission requests that the NSP should: • Analyse and discuss the trends in F2F 1 and F2F 2 since 2011. This is needed for context for F2F 2 as Czechia is progressing better than the EU average for F2F 1 (-24% compared to -13% for the EU) and F2F 2 (-17% compared to -12% for the EU) from the 2015-2017 baseline period • Elaborate the percentage contribution expected from actions undertaken under each measure in the CAP, towards achieving the F2F targets. • Elaborate how IPM will be implemented, assessed and controlled across the territory. • Elaborate how implementation of the general principles of IPM may contribute to the achievement of the F2F targets.
279	SA	5	General	In addition, Czechia should consider:

				• Conceiving and adopting national targets for reducing the use and risk of chemical pesticides from the 2015-2017 baseline period, to be expressed as a % reduction (F2F 1) • Conceiving and adopting national targets for reducing the use of more hazardous pesticides from the 2015-2017 baseline period, to be expressed as a kg reduction (F2F 2). The NSP contains considerable information on various schemes envisaged, detailing rates of aid and total budgets, as well as describing what is expected from scheme participants. However, there is no overall narrative around all the measures proposed and what can be achieved in relation to pesticide use and risk reduction.
280	SA	5	General	<u>Antimicrobial resistance (AMR):</u> <u>The SWD on CAP recommendations to Czechia:</u> <i>There is no specific CAP recommendation on AMR included in the recommendations to Czechia.</i> (section 2.9) Sales of antimicrobial veterinary products have steadily decreased and are below the EU average. However, <i>Czechia should continue to implement measures to maintain its downward trend for the overall sales of antimicrobials to contribute to the overall Farm to Fork target and ensure that all the necessary measures are in place for a smooth implementation of the new provisions of Regulation (EU) No 2019/6 on veterinary medicinal products applicable as from 2022.</i> <u>SANTE assessment on AMR:</u> The Czech authorities have superbly illustrated the situation in relation to AMR and antimicrobials consumption in the country. The SWOT analysis is comprehensive, complete and coherent. The evidence underpinning the identified need can be found in the analytical/descriptive part and in the SWOT analysis. The justification for this need and the related intervention is given (the highest use of antimicrobials occurs in the pig sector). However, Czechia should explain how the proposed interventions will contribute to the achievement of the F2F target (50 % reduction of antimicrobial consumption/use in the EU by 2030). In addition, Czechia should consider establishing national values for this F2F target.
281	SA	5	5.3.35	<u>Animal welfare</u> <u>The SWD on CAP recommendations to Czechia:</u> <i>Promoting best livestock management practices in animal welfare, especially for pigs, as well as better farm biosecurity measures.</i>

				<u>SANTE assessment on animal welfare:</u> The SWOT analysis dedicated to animal welfare (document in Annex for SO9) is very well detailed by species like dairy cows (mastitis, lameness, housing conditions to lie down), calves (dehorning), fattening cattle (drinking water, parasites, shades), pigs (castration, tail docking, absence of manipulable materials, poor housing conditions, farrowing crates), poultry (respiratory disorders, contact dermatitis, parasitism for outdoors). The SWOT analysis also provides quantitative data regarding the magnitude of the main problems identified in the different species. It in particular confirms that tail docking in piglets is a generalised practice (see Annex B2 – page 141 of the English translation: 90% of the pig farms). Overall, the interventions proposed under the heading “animal welfare” are consistent with the SWOT analysis and they focus on certain aspects, with prioritisation to dairy cows and calves, pigs and laying hens. However, there is no set of measures to address the problem of routine tail docking in pigs, which is part of the Commission recommendation and recognised by the SWOT analysis as a widespread problem. The increased space allowances of piglets may contribute to it but, up to now, the technical data and science suggest that most of the actions have to be done on the level of the fattening pigs.
282	SA	5	5.3.35	The measure proposing outdoor access (not grazing) to dry cows requires a minimum of 30 days which seems limited (dry period is usually 60 days) to provide substantial benefit for the welfare of cows. In other member states, they grant subsidies rather for grazing (not only outdoor access) for at least a 120 days period.
283	SA	5	5.3.35	As regards gilts, the welfare improvement of starting the service from 230 days is questionable since it is current practice in some Member States because it provides benefits to farmers (better fertility and longevity). It is therefore doubtful that subsidising this practice is necessary. In that case, advice and training would be more adequate.
284	SA	5	5.3.36	The intervention “exclusion of sows from individual cages” is relevant with the societal demand (including at EU level with the European Citizen Initiative “end of cage age”) but the document does not allow a real assessment due to lack of technical details.
285	SA	5	5.3.37	The intervention “change of housing technology for laying hens” is similarly a response to the societal demand for phasing out cages but the measure would also need more technical details to be assessed.
286	SA	5	5.3.37	With regard to the result indicator R.44, it is difficult to express an opinion on animal welfare because the indicator in LU mixes different species with an overestimation of big animals (cattle over poultry). Especially as Czechia has proposed a range of measures on animal welfare among species (cows, pigs and laying hens). Czechia has proposed three interventions relevant for animal welfare: one under the heading “animal welfare” but also under the heading “exclusion of sows from individual cages” and another one called “change of housing technology for laying hens”. It would be good to have the target value for the two other interventions too.

287	SA	5	General	<u>Biosecurity</u> <u>The SWD on CAP recommendations to Czechia:</u> <i>Promoting best livestock management practices in animal welfare, especially for pigs, as well as better farm biosecurity measures.</i> <i>(section 2.9) In terms of farm biosecurity, African swine fever is not present in Czechia but there is an increased risk, hence the need for the prevention of further spread of ASF. Czechia is also among the countries that need to revise/upgrade biosecurity, registration of certain farms, animal ID and animal movements.</i> <u>SANTE assessment on biosecurity:</u> In the SWOT for SO9, the reference to reinforced biosecurity measures, strategic fencing, improvement of animal registrations and databases to upgrade animal and farms identification and movements, is missing. The only reference to biosecurity measures is in “Output indicators: O.16 Number of livestock units covered by animal welfare and animal health aid or increased biosecurity measures”. Therefore biosecurity measures are considered important for protecting the health of livestock. Czechia was affected by African swine fever, and managed to eradicate it. Therefore, the Czech Republic is aware of the tremendous effort required if the disease arrives and spread, and is aware of the consequences if the disease spread to the domestic pig population. Czechia is a country at risk and should identify i) <u>Opportunities</u>: increase biosecurity to prevent introduction of African swine fever in farms with poor biosecurity; ii) <u>Threats</u>: spread of African swine fever in the farms with poor biosecurity with disruption of pig and pork production, with consequences on the pig and pork market for large and small farms. Actions should also be indicated by Czechia to implement the above mentioned improvements in the pig sector.
288	SA	5	General	<u>Sustainable diet:</u> <u>The SWD on CAP recommendations to Czechia:</u> <i>There is no specific CAP recommendation on nutrition/diet included in the CAP recommendations to Czechia.</i> <i>(section 1.3) Czechia has a very high rate of non-communicable diseases due to dietary risk factors and efforts are needed to support the shift a more healthy sustainable diet in line with national recommendations.</i> <i>(section 2.9) Czechia has a very high burden from non-communicable diseases due to dietary risk factors expressed as Disability Adjusted Life Year (DALYs) per 100 000 population attributable to diet and a comparatively medium high incidence and estimated mortality rate of colorectal cancer , both influenced by a number of dietary factors.</i>

				<i>Czech diets are, for example characterised by high levels of sodium, sugared drinks, red and processed meat, and very low consumption of fruit and vegetables. Some 46% of the population in Czechia indicates not to include fruit and vegetable in their daily diet, higher than the EU average (36%). The proportion of obese persons in the population (21% in 2017) increased since 2008 (15% in the EU). The overweight rates reported in Czechia (62%) have also been on the increase and belong to the highest in the EU (52% in the EU).</i> <i>Efforts should focus on shifting towards healthy sustainable diets, in line with national recommendations, in order to contribute to reducing the incidence of non-communicable diseases while simultaneously improving the overall environmental impact of the food system. This would include moving to a more plant based diet with less red meat and more fruits and vegetables, whole grains, legumes, nuts and seeds.</i>
289	SA	5	General	SANTE assessment on sustainable diet: Czechia refers to consumer shifts to healthy lifestyles and the importance of healthy diets. Nonetheless, in their analysis for Specific Objective 2 this mention is limited to the current changes in consumer preferences towards healthy lifestyles and higher quality food, and the need to meet such demands. Similarly, in the context of Specific Objective 3, reference to healthy diets is short, mainly highlighting the importance of raising consumer's awareness of healthy diets and EU quality schemes to guide their demand towards healthier and high-quality food products. In the background analysis for the Specific Objective 9, Czechia acknowledges the overall need to "improve the response of EU agriculture to societal demands on food and health, including safe nutritious and sustainable food as well as animal welfare". Nonetheless, the document mainly focuses on issues of food safety related to the use of pesticides, the impact of antibiotics use on antimicrobial resistance rates, as well as on promotion of animal welfare. It does not address the current dietary intakes of the population, nor the need to shift to healthier and more sustainable diets. Czechia has a very high burden of non-communicable diseases due to dietary risk factors expressed as DALYs per 100,000 population attributable to diet. Furthermore, a big portion of the Czech population is overweight (≥60%) or obese (≥20%). Moreover, the country has a high estimated consumption of red meat (beef, lamb and pork, g/per capita/d, net of waste in the EU 2010) and a very low consumption of fruit and vegetables. These consumption patterns are not addressed in the background analysis. Thus, in the National Strategic Plan, Czechia should provide an assessment of the dietary intake of meat, fruits and vegetables in the population and how it compares to national recommendations. This should also be accompanied by an overview of concrete actions envisaged to promote healthy eating habits, as well an analysis of their expected positive, neutral or negative impacts on healthy and sustainable diets. Beneficial measures to reduce red meat consumption and promote the adoption of healthier plant-based diets should also be integrated in the National Strategic Plan.

290	SA	5	General	<u>Food waste:</u> <u>The SWD on CAP recommendations to Czechia:</u> <i>There is no specific CAP recommendation on food waste included in the CAP recommendations to Czechia.</i> <i>(section 2.9) No data is yet available on food loss and waste in primary production and processing of food. Czechia's Waste Prevention Programme (2014-2020) gives little attention to food loss and waste occurring at the primary production level and the early stages of the supply chain. This could be tackled in the upcoming national food waste prevention programme, as required by Article 29(2a) of the Waste Framework Directive 2008/98/EC.</i>
291	SA	5	General	<u>SANTE assessment on food waste:</u> The NSP (SO.4) refers to a forthcoming strategic framework of circular economy – bioeconomy and food. Under the proposed action 8 [Ensure sustainable production of biomass for the production of materials, energy and fuels], they state that “Using more environmentally friendly techniques, including precision farming, and good practice” will meet the objective of the circular economy and decrease the amount of food waste. No further details are provided. Mention is made to R.10 on better supply chain organisations to improve planning of production and adjust production to demand, thus reducing waste generation, but no details are provided. Czechia should demonstrate how they tackle the issue of food waste at the level of primary production by assessing if the measures proposed in the NSP are complementary and compatible with a national waste prevention programme and other policies (especially environmental policy) to avoid potential conflicts or overlaps.
292	CO		General	Competition: Financing of interventions/activities falling outside the scope of Article 42 TFEU must be State aid cleared through a notification, an exemption request or the use of the applicable de minimis Regulation.
293	CO	5	5.3.2	Natura 2000: where the beneficiaries are not farmers but other land managers, a State aid clearance will be needed.
294	CO	5	5.3.4	If the product resulting from the processing is not an Annex I product, a State aid clearance will be needed.
295	CO	5	5.3.6	If the product resulting from the processing is not an Annex I product, a State aid clearance will be needed.
296	CO	5	5.3.7 5.3.8 5.3.10 - 5.3.16,	For all forestry-related interventions: Since forestry falls outside the scope of Article 42 TFEU, the interventions must be State aid cleared.

297	CO	5	5.3.30	Activities outside the scope of Article 42 TFEU – State aid clearance will be needed.
298	CO	5	5.3.31	If the LAGs carry out economic activities that do not fall within the scope of Article 42 TFEU, State aid clearance will be needed.
299	CO	5	5.3.38	Financing of advice related to activities falling outside the scope of Article 42 TFEU must be State aid cleared. [N.B. Also setting up consultancy services itself falls outside the scope of Article 42 TFEU].
300	CO	5	5.3.39	Training for foresters, food workers and other rural actors falls outside the scope of Article 42 TFEU.
301	CO	5	5.3.40	If financed activities fall outside the scope of Article 42 TFEU, State aid clearance will be needed.
302	ECH	2	2.1	In the description of the Need P4.05 ‘Improve water protection functions of forest stands’, the protection of forest stands against forest fires as a result of climate change and prolonged droughts could be added. In the description of the Need P6.03 ‘Enhance biodiversity and genetic diversity of the forest ecosystem’, the preservation of forest biodiversity against forest fires and other forest –related risks (e.g. pest diseases) could be added. In the description of the Need P6.04 ‘Non –productive investments in forests’, Nature based solutions, green infrastructure and/or ecosystem based approached in the forests could be introduced generating economic, ecological, cultural and social benefits.
303	ECH	3	3.2.1	In the section 3.2.1 ‘A description of the overall contribution of conditionality to the environmental and climate-specific objectives set out in points (d), (e) and (f), Article 6 (1)’, Forest –related measures such as sustainable forest management; enhancement the biodiversity and gene diversity of the forest ecosystems; regeneration of forest with climate-resilient reproductive materials; and the protection of forest against forest fires, could be added under this section as contributors to climate change mitigation and adaptation.
304	ECH	5	5.3.7	Support to environmentally friendly technologies and the establishment of early warning systems or other forest monitoring tools to improve forest risk prevention and management (e.g. forest fires, droughts, bark beetle), could be added under this 5.3.7 intervention.
305	ECH	5	5.3.7	As for the development of forest nurseries, their reproductive materials should meet appropriate genetic, morphological and physiological quality and sanitary standards and protocols contributing to preserving biodiversity.
306	ECH	5	5.3.8	The forest infrastructure could also contribute to an effective forest fires prevention and response in the case of fire event or other forest –related risk (e.g. pest outbreak).
307	ECH	5	5.3.15	This intervention intends to respond to the need to protect amelioration and stabilisation trees that protect forest soils/plants from gradual degradation, poor weather resistance or susceptibility to pest-induced disasters and forest fires risk to be included . The trees for regeneration could be climate or/and fire resilient ones.

308	ECH	5	5.3.27	Nature-based solutions or/and ecosystem-based risk reduction measures, could be added under this intervention to prevent and control natural disasters in the forests such as wildfires, floods & pest diseases and delivering other social, economic and ecological benefits as well (e.g. promoting eco-tourism).
309	REG	4	4.6	Please, elaborate on the complementarities with IROP as you did for OP TAK or OP ZP. For some interventions, there might be still overlaps – support of nature trails or libraries. For instance, in SC 5.1 CLLD priority axis, IROP envisages to support also tourist routes – what will be the demarcation line precisely? As regards libraries, in IROP, they will be supported in municipalities above 10.000 inhabitants - does it mean OP RV will support municipalities under 10.000 inhabitants
310	REG	4	4.6	Demarcation for OP TAK in SC 4.4, SC 4.2, SC 2.1 – what is the demarcation line? For other SCs the demarcation is very well described whereas for these is missing or is not very clear.
311	REG	4	4.6	Strategy should also elaborate on the involvement of the Ministry of Environment in the different agricultural policies in the countryside to address current weaknesses described in the strategy.
312	CON		General	We were please to notice that synergies with Horizon are mentioned. Nevertheless, in our opinion synergies should be extended also to CEF2 Digital and Digital Europe Programme, DEP, which for the time being are completely missing from this programme. For what concerns data, DG CNECT encourages seeking complementarities in particular with the forthcoming deployment of European Data Spaces, as planned in the EU Data Strategy communication. Data Spaces aim to offer a secure and trusted mean to make available data, for both the private and public sector, based upon voluntary agreements or legal obligations where such obligations are in force. In particular we wish to mention the Green Deal and the Agriculture data space. The Data Spaces will be deployed with the support of the Digital Europe programme from 2021 onwards. DG CNECT recommends to include in the requirements for actions to be supported by EU programmes the obligation that, where relevant, datasets resulting from the action should be made available as open data under the conditions defined in the Open Data Directive (Directive (EU)2019/1024 of 20/6/2019) as “high value datasets”, i.e.: a) available free of charge; b) machine readable; c) provided via APIs; d) provided as a bulk download, where relevant. The Czech Republic should note that the European Commission has recently granted all European SMEs access to its own automatic translation service, eTranslation (https://ec.europa.eu/cefdigital/wiki/display/CEFDIGITAL/eTranslation), covering not only all EU official languages but also Russian, Turkish, Chinese, Japanese and Arabic. eTranslation, as well as a few more basic language tools, are available at https://language-tools.ec.europa.eu/ both to SMEs and public administrations at the local, regional or national level.
313	RTD	8	General	The European Commission recalls that, through the CAP strategic planning, EU-funded R&I outcomes (i.e. research results, tools, instruments) should be increasingly taken up by Member States to address the transformative change necessary in agriculture to tackle notably the interlinked climate and biodiversity crises. Furthermore, three Horizon Europe Missions

				("Adaptation to Climate Change", "A soil deal for Europe" and "Restore our Ocean and Waters by 2030") offer opportunities for accelerating the testing and deployment of cutting edge solutions through place-based activities in rural areas. As such, please describe how you are making use of the CAP to support the implementation of the European Green Deal Missions.
314	RTD	8	General	The Partnership on "Safe and sustainable food systems for people, planet and climate" will contribute to develop solutions for providing co-benefits for nutrition, quality of food, climate, circularity and communities, which is also very relevant to achieve the objectives of the CAP. As such, please describe how you are making use of the CAP to support the implementation of Partnerships, especially the Partnership on "Safe and sustainable food systems for people, planet and climate".
315	RTD	2	2.1.4	The bioeconomy ensures that biological resources are used for the benefit of society along all pillars of sustainability (economic, environment, social - including plant, animal and human health). It helps managing trade-offs between different pressures on biological resources, while helping to create green growth and jobs in rural areas. Agriculture, in the framework of the bioeconomy, contributes to (i) the restoration and management of land through careful balancing of sustainable extensification without increasing overall land demand, (ii) providing healthy food that is contributing to the reduction of non-communicable diseases, overweight and obesity, (iii) providing feedstock for biobased industries that contribute to de-carbonize Europe and substitute greenhouse gas intensive products, and (iv) generating job opportunities. Czechia has no Bioeconomy Strategy. As such, Czechia should develop a Bioeconomy Strategy in association with the CAP Strategic Plan. Please also describe how you are planning to scale up the deployment of the circular and sustainable bioeconomy through the support of the CAP. You might use the recommendations formulated in the Final Report of the Bioeconomy Policy Support Facility.
316	EMP	5	General 5.3.31	We would like to underline the importance of specific objective 8 "Support to employment, growth, social inclusion and local development". In this context, we would like to point out the trend of growing number of socially excluded localities and persons at risks of poverty in the peripheral areas. Therefore, we would like to stress the need for concerted approach across different EU funding programmes to this area especially through close cooperation with Employment + programme. We would also like to stress the importance of coordinated approach to CLLD through different EU programmes including those funded by ESF+ in the Czech Republic, i.e. Programme Employment+ and Johannes Amos Comenius.
END				