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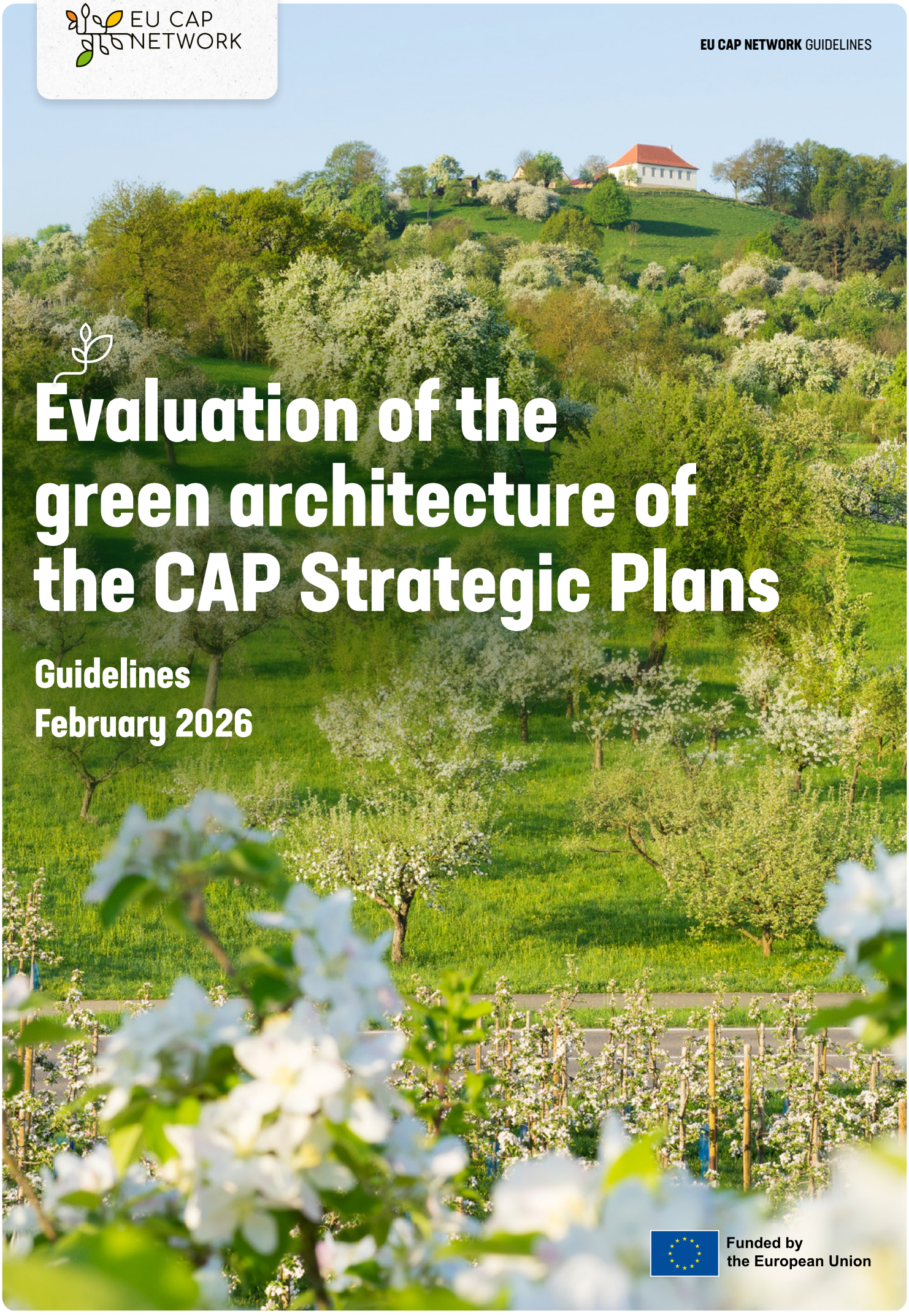

Evaluation of the green architecture of the CAP Strategic Plans

Guidelines
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List of acronyms

AECM	Agri-environment-climate measures
AKIS	Agricultural knowledge and innovation system
AL	Arable land
AMR	Antimicrobial resistance
ANC	Areas of natural constraints
APR	Annual performance report
ASD	Areas facing specific disadvantages
ATT	Average treatment effect on the treated
CAP	Common Agricultural Policy
CCA	Cumulative cost assessment
CD	Crop diversification
CIS	Coupled income support
CLRTAP	Convention on long-range transboundary air pollution
CMEF	Common monitoring and evaluation framework
COOP	Cooperation
CSP	CAP Strategic Plan
CST	Cost structuring tables
DEM	Digital elevation model
DiD	Difference in differences
EAFRD	European Agricultural Fund for Rural Development
EBCC	European Bird Census Council
EEA	European Environment Agency
EIP-AGRI	European Innovation Partnership for agricultural productivity and sustainability
ENVCLIM	Environmental, climate-related and other management commitments
EQ	Evaluation question
ESDAC	European Soil Data Centre
FADN	Farm Accountancy Data Network
FoS	Factors of success
FSDN	Farm Sustainability Data Network
FTE	Full-time equivalents
GA	Green architecture
GAEC	Good agricultural and environmental conditions
GHG	Greenhouse gas
GIS	Geographic information system
GO	General objective
GPA	Gold-plating analysis
IACS	Integrated administrative control system
IC	Implementation cost
INSPIRE	Infrastructure for Spatial Information in the European Community
INVEST	Investment support
IPCC	Intergovernmental Panel on Climate Change
IPM	Integrated pest management
JRC	Joint Research Centre
KNOW	Support for training and knowledge
LAG	Local Action Groups
LPIS	Land Parcel Information System
LU	Livestock units
LUCAS	Land Use/Cover Area frame Survey
LULUCF	Land use, land use change and forestry
MA	Managing Authority
MS	Member State
NAPCP	National Air Pollution Control Programmes
NECP	National Energy and Climate Plan
NGO	Non-governmental organisations
NVZ	Nitrate vulnerable zones
OECD	Organisation for Economic Co-operation and Development
PA	Paying agency
PAF	Prioritised action framework
PECBMS	Pan-European Common Bird Monitoring Scheme
PMEF	Performance monitoring and evaluation framework
PSM	Propensity score matching
RBMP	River basin management plan
RDP	Rural Development Programme
SA	Sensitivity analysis
SAIO	Statistics of agricultural input and output
SCM	Standard cost model
SEA	Strategic environmental assessment
SMR	Statutory management requirement
SO	Specific objective(s)
SOC	Soil organic carbon
SPA	Special protection areas
SWOT	Strengths, weaknesses, opportunities and threats analysis
TC	Targeted consultation
UNFCCC	United Nations Framework Convention on Climate Change
WFD	Water Framework Directive

Terminology

This section provides definitions of key terms used in these guidelines. It aims to ensure clarity and consistency throughout the report by explaining concepts and key terms used across the guidelines. Furthermore, on the European Evaluation Helpdesk for the CAP website, there is a comprehensive glossary that compiles essential terms for evaluating CAP Strategic Plans.

'Green architecture (GA)' refers to the combination of interventions and other instruments that, according to the national CAP Strategic Plans (CSPs), address environmental and climate objectives, e.g. specific objective (SO) 4 (climate action), SO5 (natural resources), and SO6 (biodiversity). Another term frequently used to refer to this combination of interventions and other instruments is 'environment and climate architecture', as used in Regulation (EU) 2021/2115.

'CSP instruments' indicate all aspects of the CSPs which have been designed by Member States (MS), and which will affect the CSPs' contribution towards the attainment of the objectives. Instruments within the CSPs include good agricultural and environmental conditions (GAECs) (also commonly referred to as conditionality, together with statutory management requirements (SMRs)), requirements (including baselines), definitions and interventions.

'Evaluation phase' refers to the three key phases of the GA evaluation process: 1) defining the evaluation framework; 2) selecting indicators, data sources and methods; and 3) analysis and reporting.

'Evaluation steps' refer to the intermediate steps of each evaluation phase.

'Key evaluation elements' refer to the environmental and climate topics to be evaluated under each SO. Note that when combining the various elements that relate to one SO, one gets a complete 'SO evaluation'.

'Interplay' is the term used to refer to the links between: 1) the instruments forming part of the GA; 2) the GA instruments with the rest of the CSP; and 3) the GA instruments with instruments external to the CSP, and the extent to which this interplay enabled progress to be made towards achieving the environmental and climate objectives, by assessing if there are synergies, trade-offs or overlaps in CSP design.

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Questions and suggestions regarding the content of the publication can be addressed to the European Evaluation Helpdesk for the CAP at evaluation@eucapnetwork.eu.

1. Introduction

1.1. Definition of green architecture, objectives of the guidelines and their rationale

In their CAP Strategic Plans (CSPs), Member States (MS) have opted for a wide range of designs for interventions and other instruments to address the environmental and climate objectives, e.g. specific objective (SO) 4 (climate action), SO5 (natural resources) and SO6 (biodiversity). This combination of interventions and other instruments is hereafter referred to as the **green architecture (GA)**. Another term frequently used to refer to this combination of interventions and other instruments is 'environment and climate architecture', which is also the term used in Regulation (EU) 2021/2115.

The objective of these guidelines is to support Managing Authorities (MAs) and evaluators in assessing **CSPs' GA, focusing on how GA instruments work together.** In other words, how to assess the combined use of multiple instruments to address the three CAP environmental and climate objectives.

During the 2023-2027 Common Agricultural Policy (CAP) programming period, MS are required to evaluate the impacts of their CSPs in relation to all SOs that are addressed in their plan, either by objective or by comprehensive evaluations covering several SOs [1]. Where relevant, MS are also required to assess specific topics covered by the CSPs, including the environmental and climate architecture [2]. Hence, according to the legal requirements, MS may choose to evaluate the impacts of the instruments designed to address SO4, SO5 and SO6 in various ways.

The GA is the 'glue' for the entire environment and climate perspective of the CSPs, as it is the combination of the instruments used that provides the means to advance towards the three environmental and climate objectives. Because the three environmental and climate SOs and the instruments contributing to these objectives are frequently interlinked, it is important to assess the impact resulting from the GA design as a whole rather than just evaluating individual topics, interventions or indicators. In this way, it is possible to assess the GA's performance overall and consider how to make it more effective, coherent and efficient with regard to advancing towards environmental and climate objectives.

Thus, these guidelines are meant to provide inspiration for assessing how the bundle of instruments, used in combination, addresses the CAP environmental and climate objectives. The simultaneous examination of progress across various criteria and indicators also recognises that improvements in one area often generate co-benefits (or possible trade-offs) in another. This allows for a holistic approach to a GA assessment.

Evaluations by MS of the environmental and climate impact of the Rural Development Programmes (RDPs) from the 2014-2022 programming period also often included an assessment of all 'green' RDP instruments. Compared to the past programming period, the only new elements of what is now called the GA are that the good agricultural and environmental conditions (GAECs) are now programmed as part of the CSPs and that eco-schemes have been introduced. In relation to evaluations, green direct payments were (in general) not part of the RDP evaluations. Hence, the assessment of a combination of instruments designed to address environmental and climate objectives is not new to MAs and evaluators. However, the EU CAP Network has not provided specific guidance on aspects to consider in the assessment of the combination of instruments. Given the prominence of the GA during the 2023-2027 programming period, the assessment of a bundle of green instruments was considered a priority and was also requested by numerous MS.

1 Commission Regulation (EU) 2022/1475 Article 2(a) states that "Member States shall plan the evaluations of the Specific Objectives referred to in Article 6(1) and (2) of Regulation (EU) 2021/2115 which are addressed in their CAP Strategic Plans, in accordance with the CAP Strategic Plan's intervention logic, by objective or by comprehensive evaluations covering several objectives, …", Article 2(b) "Member States shall assess their CAP Strategic Plans using the relevant evaluation criteria and assess the impacts of their CAP Strategic Plans taking into account the scope, the type and the uptake of the CAP Strategic Plan's interventions".

2 Commission Regulation (EU) 2022/1475 Article 2(d) states that "… Member States shall assess also specific interventions or topics of the CAP Strategic Plans, such as the environmental and climate architecture as referred to in Article 109(2), point (a), of Regulation (EU) 2021/2115".

1.2. Scope of the guidelines and timing of the evaluation

Three aspects have shaped the development of these guidelines:

1. **There is no uniform design of GA across MS.** The GA is not defined as a fixed concept in the regulations, nor is it designed uniformly across all CSPs; rather, it depends on the intervention logics designed by the MS in their CSPs. Generally, however, it is understood as the combination of instruments which contribute to advancing towards SO4, SO5 and SO6. Note that the same instruments can also be used to address other SOs, in particular SO9 and aspects related to animal welfare. However, when the same instruments are used to address other SOs, they are not considered part of the GA and, therefore, outside the scope of these guidelines.

2. **There is no uniform way of designing an evaluation to assess the performance of the GA**. MS are required to undertake evaluations of the impacts of their CSPs on SO4, SO5 and SO6, and, where relevant, to assess the environmental and climate architecture. These evaluations could be carried out separately or in one comprehensive evaluation.

3. **The GA should contribute to policy objectives beyond the CAP,** as the GA is expected not only to contribute to the SOs of the CAP but also to other EU environmental and climate policy objectives and legislative commitments [3].

Hence, these guidelines are intended to provide ideas and inspiration for undertaking an evaluation of the GA, regardless of the instruments included in the GA of the MS, and to take into account the different ways evaluations can be designed and approached. It also contains ideas for assessing the GA's performance against objectives and targets derived from EU and national environmental legislative instruments external to the CAP.

These guidelines cover in detail the **evaluation criteria of effectiveness, coherence and efficiency** [4] for which evaluation questions (EQs) and accompanying judgement criteria, factors of success (FoS) have been proposed. Although comprehensive guidance for assessing the GA is proposed and recommended, when designing a GA evaluation, one may choose to address only one or two of these evaluation criteria, and/or to include only some of the proposed EQs/FoS for the criteria assessed. The intention is that the guidelines serve as inspiration for defining the scope and evaluation framework of a GA evaluation, but the proposed approach outlined in these guidelines should be adapted to the circumstances of the evaluation at hand.

Limitations of the guidelines: These guidelines provide inspiration for assessing the GA in relation to SO4, SO5, and SO6. It is not a guide on how to assess the impacts of the CSPs in relation to SO4, SO5 and SO6, although many parts of the guidance may be useful for this purpose, as the GA is a fundamental part of this broader assessment. Nor do these guidelines contain guidance on how to assess the instruments forming part of the GA and their impacts on other SOs (e.g. economic or social objectives), including how to assess the use of the same GA instruments when they have been designed to address objectives related to animal welfare and antimicrobial resistance (AMR) under SO9 [5].

Difference between a GA evaluation and an SO evaluation: A GA evaluation is different from an evaluation of a single SO as it considers the effects across multiple SOs simultaneously and recognises the co-benefits or possible trade-offs that exist between the various SOs and instruments involved. A GA evaluation may be undertaken in addition to SO evaluations, or replace more focused SO evaluations (as long as the impacts of the GA in relation to each SO are identified), depending on MS choices and priorities.

The difference between the two types of evaluations is the aim, or the outcome. While a SO evaluation aims to assess the CSP effects on a particular SO from the use of a combination of instruments, a GA evaluation goes beyond that by also considering the trade-offs and co-benefits among several SOs. As such, it may also inform the evaluation of General Objective (GO) 2 of the CSP ex post evaluation.

The approaches to the effectiveness and efficiency assessment for a SO evaluation and GA evaluation are the same, as the starting point of the assessment is the intervention logic in the CSP (see Section 2.1). For example, all instruments programmed in relation to the SO in question will be part of the SO evaluation scope, or, for a GA evaluation, all instruments programmed in relation to SO4, SO5 and SO6 are considered part of the GA and, as such, they are part of the GA evaluation scope. Also, for a GA evaluation, it is necessary to first assess the effectiveness of each of the three SOs in scope (e.g., SO4, SO5, and SO6), either as part of the GA evaluation or separately.

The difference lies in the scope of the coherence assessment, which is considered the fundamental cornerstone of a GA evaluation. A standard coherence analysis of a single SO evaluation would look at the inter-relations, co-benefits and trade-offs between instruments but only within the context of a single SO. Whereas for a GA evaluation, the scope of the coherence analysis is expanded to capture inter-relations, co-benefits and trade-offs between instruments across the three SOs. If the starting point of the assessment is the effects in relation to only one SO, then one will not necessarily capture the various inter-relations that may result from using a combination of instruments to address the three different environmental and climate objectives in parallel.

With this said, the first part of the proposed approach to assessing effectiveness is identical to that proposed for a SO evaluation and builds on the EU CAP Network's guidelines 'Use of factors of success in evaluation' [6]. This first step is included in the GA guidelines as it is a necessary building block for the rest of the proposed GA assessment. Hence, where an MS has already undertaken an effectiveness analysis of SO4, SO5 and/or SO6 in line with the FoS guidance, then the GA guidance does not suggest doing an additional effectiveness assessment of the GA instruments. Rather, the already undertaken effectiveness analysis can be used as the first building block for the GA assessment.

3 See Article 109(2) and recitals 30 and 42 as referred to above. Further discussed in Chapter 2.2 below.

4 The five evaluation criteria are effectiveness, coherence, efficiency, relevance and EU added value. Note that guidelines are provided for the first three evaluation criteria.

5 Note that single interventions designed to address animal welfare and AMR might not be attributed to SO4, SO5, and SO6 in the CSPs, but only to SO 9. However, complexity and confusion are sometimes related to the fact that interventions designed to address animal welfare and AMR count towards the ring-fencing requirements under both direct payments and rural development; however, these instruments are not considered part of the GA as they are not designed to address SO4, SO5 and SO6.

6 European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, Use of factor of success in evaluation, Brussels, 2023. https://eu-cap-network.ec.europa.eu/publications/use-factors-success-evaluation_en.

The table below outlines the main differences between an SO and a GA evaluation, as described above.

Table 1. Differences between a SO and GA evaluation

Dimension	SO evaluation (SO4/SO5/SO6)	GA evaluation (green architecture)
1. Aim	Assesses the CSP effects on one specific SO, based on the instruments programmed for that SO.	Assesses the whole set of green elements of the CAP (conditionality, eco-schemes, agri-environmental climate measures (AECM), sectoral interventions, etc.) and their combined effects and interplay across environmental and climate objectives. Can also feed into the ex post evaluation of GO2.
2. Scope of instruments	Includes only the instruments programmed for the SO in question.	Includes all instruments programmed for all three CAP environmental and climate SOs.
3. Evaluation focus	Focus on effects related to one SO; limited visibility of cross-SO interactions.	Focus on co-benefits, trade-offs, and interactions between GA instruments and across SO4-SO6; system-level analysis.
4. Evaluation criteria (effectiveness, efficiency, coherence)	For SO-focused evaluations, at least effectiveness and efficiency should be covered in-depth. Effectiveness and efficiency assessment to be based on CSP intervention logic and FoS guidance; coherence assessed within one SO.	Same approach for assessing effectiveness and efficiency as for a SO evaluation; existing SO analyses can serve as input. In-depth coherence analysis must be undertaken for a GA evaluation, and is the differentiating element, explaining why combined effects occur.
5. Timing and relationship to other evaluations	Conducted during implementation, and≈implemented according to national evaluation plans; typically SO-specific.	Conducted during implementation and may contribute to the ex post assessment of GO2. May complement or replace SO evaluations if impacts on each SO remain identifiable.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Should a GA evaluation be implemented in addition to, or instead of, a SO evaluation?

1. **When a GA evaluation is carried out in addition to, and after, SO evaluations.** If a GA evaluation is conducted after SO evaluations, it could be interesting to focus on the interaction and effects of the interventions examined separately in relation to SO4, SO5 and SO6. The coherence between what was planned and subsequently implemented to achieve a single SO could be examined to determine whether considering the other SOs might have led to a different design or to interventions targeted to achieve greater impacts/outcomes and/or achieve the desired outcomes in a more efficient way. It could also examine whether there have been unexpected interactions between the different interventions programmed under the GA, either positive or negative. This broader approach might also highlight areas worthy of further attention that could be explored in more detail through a future, more focused evaluation.
   Furthermore, a GA evaluation focuses on multiple SOs and examines how the whole system of instruments works together across objectives. A GA evaluation can also address whether the distribution of funds among SOs is balanced and proportionate relative to the MS environmental needs. The GA evaluation also captures the wider effects of the GA instruments, which cut across the three environmental and climate SOs. At a higher policy level, a GA evaluation carried out in addition to single SO evaluations can inform (a) strategic perspectives, and especially whether the GA is it for purpose as a whole; (b) policy learning and improving the design of policy mixes (crucial for the post-2027 CAP); (c) take good account of farmers' perspectives and experience because farmers view focus on what needs to happen on their farm for environmental and climate purposes rather than on which instrument funds the action implemented, or which SO this is being used to fund. These three aspects are all further developed in the three technical annexes (A-C).

2. **When a GA evaluation replaces the SO evaluations or is carried out in parallel to SO evaluations.** All the aspects described for situation I (e.g. when a GA evaluation complements SO evaluations) could also apply when a GA evaluation replaces SO evaluations; it all depends on the scope of the GA evaluation, the integration with SO evaluations, and the sequencing of a potential GA evaluation versus SO evaluations. This approach may save some efforts by implementing one large evaluation instead of four evaluations, which might have a narrower approach (although to deliver findings in relation to all three SOs, the MA needs to budget for the availability of expertise and data relevant to all three SOs). It also provides the possibility to focus on the interplay between environmental components, e.g. to assess how effective or efficient a bundle of instruments is in relation to a group of related environmental benefits, rather than singling out the effects of individual instruments in relation to individual SOs. The SO evaluations could also be programmed after the GA evaluation, in which case the GA evaluation might provide insight into aspects to be further investigated in the SO evaluations.

In terms of **timing**, the second part of the programming period is likely to be the most suitable time to carry out a GA evaluation, as more implementation data will be available and many of the effects to be assessed will take time to materialise. It is also important to consider the timing in relation to other evaluations planned, as the GA evaluation may want to build on the findings of other evaluations, for example, evaluations considering economic aspects or evaluations of individual environmental and climate SOs.

However, an evaluation planned earlier during the implementation period offers the advantage that it would possibly allow for the modification of the GA already during this programming period, or at least get early results to be taken into account for the coming period (2028-2034). It may also serve to initiate stakeholder/farmer discussions on the virtues and shortcomings of the designed GA, where they are involved in the evaluation process, thus potentially allowing for further improvement in the GA's performance during the implementation period, as well as for the upcoming period.

1.3. Target group and structure of the guidelines

These guidelines are intended for both MAs and evaluators, two stakeholder groups with distinct needs. To reflect these needs, the guidelines consist of a shorter main report, followed by three annexes with more comprehensive technical guidance (Annex A-C) and Annex D containing the list of references, links to relevant EU legislation and an overview of relevant literature.

The **main report** (e.g. page 1-22) is primarily targeted at the MAs. It contains more general information relevant to deciding on the scope of a GA evaluation, including drafting the terms of reference for a tender. Hence, this part is less of a guidance document for evaluators and rather serves as a planning document for MAs before procurement of a third party to support with the evaluation. It also contains an overview of the information provided within the three technical annexes, allowing the reader to obtain a quick overview of their content and identify the parts relevant to explore in more depth for the evaluation at hand. With that said, the information in the main report is not repeated in the annexes; hence, in order to understand the annexes, the main report needs to be read first.

The more comprehensive and technical **annexes** (Annex A-C, pages 23-80) are targeted at both MAs and evaluators, designed to allow for a 'pick-and-mix' approach, and for a more in-depth investigation on specific topics of relevance. They also serve to finetune the definition of the scope, helpful for MAs before a procurement exercise or for evaluators when invited to elaborate a fully-fledged evaluation methodology. The annexes are organised by evaluation criteria covered in these guidelines, e.g. effectiveness, coherence and efficiency. More information on the content of the annexes can be found in Chapter 3. The annexes should be read in combination with the main report.

2. Determining the scope of a GA evaluation

The first step in the evaluation process is to determine the scope of the evaluation. In order to do this, it is essential to build an understanding of what is considered to be part of the GA, including revisiting (and potentially revising) the relevant intervention logic in the CSP. It is also crucial to understand the scope of the SO4, SO5 and SO6, and the links between these and related policy objectives external to the CAP. These aspects are discussed in detail below, further complemented in Annex B - Coherence which contains guidance for a coherence assessment.

2.1. Understanding the GA and its intervention logic

Requirements related to the design of the GA in the CSPs which influence the design of an evaluation study, and a discussion on the relevance of the CSP intervention logic, are outlined below.

2.1.1. Design of GA in the CSPs

In their CSPs, all MS must implement a set of basic requirements, most of which contribute to the advancement towards SO4, SO5 and SO6. These basic requirements include the nine GAEC standards defined in the CSP Regulation. Common rules regarding these GAECs are established in the EU legislative act, but MS have flexibility in their implementation. Also, the use of definitions in the CSPs - where MS also have some flexibility in the implementation (see below) - will impact the implementation of the GAECs. In addition, all MS must programme eco-schemes as well as agri-environment-climate schemes under environmental, climate-related and other management commitments (ENVCLIM) [7]. But MS have a lot of flexibility with how to design these instruments to address the environmental and climate objectives. MS are also mostly free to allocate funding to interventions as they deem appropriate, based on their strengths, weaknesses, opportunities and threats analysis (SWOT) and needs assessment. However, they have to respect several ring-fencing

7 Environmental, climate and other management commitments, Article 70 of CSP Regulation (EU) 2021/2115.

requirements, i.e. the obligation to dedicate a specified share of their financial allocations to certain intervention types. This is the case for the share of the direct payment allocation for eco-schemes (25%), as well as the share of the European Agricultural Fund for Rural Development (EAFRD) envelope allocated to environmental, climate and animal welfare (including AMR) actions (35%). The latter ring-fencing requirement is not solely linked to ENVCLIM, but also takes into account the financial allocations to area-specific disadvantages (ASD), areas of natural constraints (ANC) (50%) and investment support (INVEST) allocated for the purposes above [8]. Also to note is that 5% of sectoral support for the wine sector and 15% of sectoral support for the fruit and vegetable sector must be ring-fenced for environmental and climate objectives. These types of interventions therefore form the core of the GA, and, together with conditionality, should be part of any GA evaluation.

In addition, other instruments should be included in the scope of the GA if designed to address SO4, SO5 and SO6, such as cooperation support (COOP) [9], support for knowledge and training (KNOW) [10] and coupled income support (CIS) [11].

Also, MS have made use of the definitions and requirements defined in the CSPs related to, for example, agricultural activity (e.g. permanent grassland, permanent crops, agroforestry), agricultural area and eligible hectares to contribute to SO4, SO5 and SO6. Where this is the case, these definitions and requirements should also be considered as part of the GA scope.

2.1.2. Revisiting and revising the GA intervention logic for the purpose of an evaluation

The overview above is intended to provide ideas for the types of instruments of relevance to consider as part of the GA. However, the intervention logic developed in the CSP should be the starting point to decide on the most appropriate suite of instruments that is in scope for the MS concerned.

An intervention logic is a structured narrative or diagram where inputs, activities, outputs, results, and impacts are connected to policy objectives (see Figure 1 below). In the context of the GA, this entails setting out how every instrument is expected to contribute to environmental and climate objectives of the CAP and how these instruments are linked to EU environmental and climate policy objectives and legislative obligations external to the CAP.

To identify the relevant intervention logic for the evaluation at hand, Section 3.1 of the CSPs is likely to contain most of the information required. The section is titled "Overview of the environmental and climate architecture," and outlines how conditionality, eco-schemes, ENVCLIM, ASD, INVEST, COOP, and KNOW (and potentially other instruments, depending on the MS) are expected to contribute to SO4, 5, and 6. However, relevant information is often fragmented across multiple sections of the CSP, hence a systematic search and mapping of information found in other sections may be required to get the full picture and to develop a comprehensive intervention logic. Additional important sections of the CSP to consider include:

- Section 2 (needs assessment): Identifies and ranks the environmental and climate challenges (e.g. soil erosion, biodiversity loss) that GA interventions address. This section links the needs identified to SO4, SO5 and SO6.
- Section 3.10 (conditionality): Details mandatory practices that set the baseline standards of the GA, such as soil cover requirements or buffer strips.
- Section 5 (interventions): Describes the design of all types of interventions, including their objectives, activities, expected outputs, and financial allocations.
- Section 6 (performance framework): Provides output and result indicators (e.g. 'Hectares under eco-schemes', or 'Share of farmers trained') to measure progress toward SO4, SO5 and SO6.
- Section 3.1.4: Provides an explanation of how the environmental and climate architecture of the CAP Strategic Plan is intended to contribute to long-term national targets established under, or derived from, the environmental and climate legislative acts listed in Annex XIII, with which the CSP design must be consistent.

There may be situations in which the intervention logic outlined in Section 3.1 of the CSP is not considered sufficient/appropriate for the evaluation to be undertaken. If this is the case, there may be a need to reconstruct an intervention logic for the purposes of the evaluation. For example, mapping interventions to objectives will require an assessment of the links established in Section 5 (interventions) of the CSPs between interventions and SO. The same section also contains information regarding the expected results or impact indicators to which the intervention should contribute. This analysis is part of the coherence assessment because it shows how instruments are intended to interact internally, i.e. the interplay between different instruments and the likely effects of this. A helpful device is a diagram showing the basic causal chain, with arrows linking inputs and activities to impacts and their interplay, capturing how the arrows from different conditionalities and/or interventions are intended to lead to the same result or effect. See Figure 1 below as an example.

Furthermore, the instruments relevant to consider as part of the GA scope may change over time, as revisions have taken place to the CSPs during the implementation period. Particularly, the rules regarding GAECs have been revised [12] during the course of the programming period, which often led to revisions of the CSPs. In this case, there may be a need to revise the intervention logic defined for the CSP at the time of approval to be suitable for the evaluation to be undertaken.

8 Articles 71, 72, 73 and 74 of Regulation (EU) 2021/2115.
9 Articles 77 of Regulation (EU) 2021/2115.
10 Articles 78 of Regulation (EU) 2021/2115.
11 Articles 32 of Regulation (EU) 2021/2115.
12 Regulation (EU) 2024/1468 of the European Parliament and of the Council of 14 May 2024, which amends Regulations (EU) 2021/2115 and (EU) 2021/2116 regarding: GAEC standards, schemes for climate, environment, and animal welfare; amendments and review of CAP Strategic Plans; and exemptions from controls and penalties.

When deciding on the intervention logic for the study at hand, consider including the following elements, in whole or in part (see the visual below).

1. **The definition of needs**. Highlight the environmental and climate challenges in agriculture, such as major sources of greenhouse gas (GHG) emissions, soil degradation, water pollution and biodiversity loss. Environmental and climate-related needs are clearly recorded and ranked in Section 2.1 of the CSPs and for each SO separately. However, one may want to revisit the SWOT summary in Section 2.1 of the CSPs or the CSP-annexed versions of the SWOT analysis and the strategic environmental assessment (SEA).

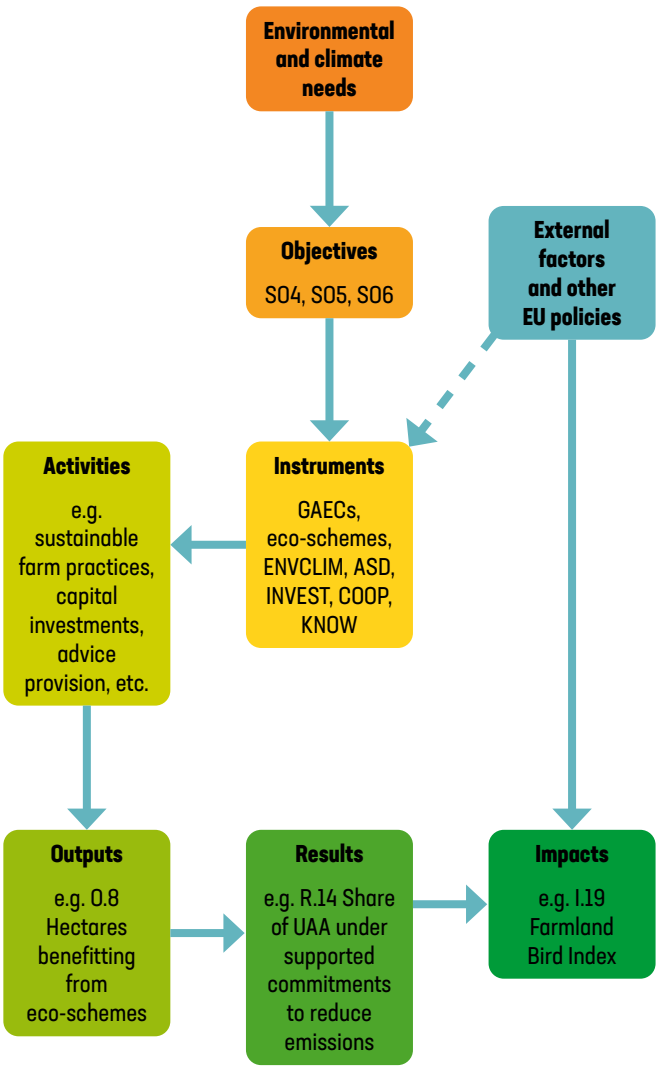
2. **The objectives specified**. In the case of a GA evaluation, this step outlines how the needs link to SO4, SO5 and SO6, and, in the next step, how the GA instruments link to each of the SOs. For example, eco-schemes may target SO6 by providing 'space for nature', and SO5 by 'limiting chemical nitrogen usage'.

3. **A map of inputs (e.g. instruments), activities and outputs**:
   - Inputs – The design of instruments in relation to SO4, SO5 and SO6, including for example financial resources (CAP financial allocations). It is worth noting that other EU environmental policies may directly influence the design of CSP instruments (e.g. through priority criteria for support).
   - Activities – The types of environmental and climate farm practices required through the implementation of conditionality (mandatory practices) and mandatory definitions, and supported through the voluntary uptake of interventions, such as eco-schemes, ENVCLIM, ASD, INVEST, COOP and KNOW (and/or other instruments designed to target SO4, SO5 and SO6).
   - Outputs – Measurable deliverables, possibly using output-indicators, such as the number of hectares under each eco-scheme, number of investments managing manure, number of farmers trained (KNOW), etc.

4. **A description of the expected results and impacts**:
   - Results – Short-term changes, such as share of livestock units (LU) under supported commitments to reduce GHG emissions (R.13) or share of utilised agricultural area (UAA) under supported commitments beneficial for soil (R.19), etc.
   - Impacts – Long-term outcomes, such as lower GHG emissions (impact indicator I.10), improved water quality (I.15) or enhanced biodiversity protection (I.20).

5. **A description of the contributions from external factors and other relevant EU policies** (e.g. Annex XIII of the CSP Regulation). Present an overview of the complementarity between baseline conditions, conditionality requirements and interventions, how they work together to achieve results and how they align with external instruments (e.g. nitrate vulnerable zones (NVZ) action plans) and national planning instruments derived from EU legislation (such as prioritised action frameworks (PAFs) under the Habitats Directive) [13].

Figure 1. GA intervention logic template



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), based on the Better Regulation Toolbox [14]

The elements listed above comprise the main elements of an intervention logic, often used for effectiveness and coherence assessments, which can then be complemented or further elaborated, depending on the evaluation criteria being assessed. For example, when assessing coherence, the emphasis may be on the complementarity part of the intervention logic, and the external dimension may be significantly expanded if external coherence is considered (see Chapter 3.1 below, and Chapter B3 of Annex B – Phase 1: Defining the evaluation framework for assessing the coherence of GA). On the other hand, if efficiency is considered, then one may consider whether the intervention logic explicitly identifies and clearly illustrates the relationship between resources invested and the anticipated outputs, results, and ultimately impacts of the interventions (currently not visualised in the figure above). See Chapter 3.1 below, and Chapter C3 of Annex C – Phase 1: Defining the evaluation framework for assessing the efficiency of GA for more information.

13 Directive 92/43/EEC.

14 European Commission, 'Better regulation guidelines and toolbox', 2023. Available at: https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en.

2.2. Understanding the environmental and climate objectives under and outside the CAP

2.2.1. Understanding the CAP's specific objectives: SO4, SO5 and SO6

The environmental and climate objectives of the CAP are defined in SO4, SO5 and SO6. For evaluation purposes, several key evaluation elements have been defined for each SO in Annex I of Regulation (EU) 2022/1475. These are the environmental and climate 'topics' that make up the elements needed to get a complete and comprehensive view in relation to one SO. The three SOs and their corresponding key elements are outlined in the table below.

Table 2. CAP environmental and climate SOs and key elements

Specific objective	Key evaluation elements to assess	
SO4: To contribute to climate change mitigation and adaptation, including by reducing greenhouse gas emissions and enhancing carbon sequestration, as well as promote sustainable energy.	4.1	Climate change mitigation: Based on GHG and carbon sequestration.
	4.2	Climate change adaptation: Based on the resilience of agriculture to climate change.
SO5: To foster sustainable development and efficient management of natural resources such as water, soil and air, including by reducing chemical dependency.	5.1	Efficient management of natural resources: Based on preserving or enhancing the quality and quantity of natural resources by reducing pollutants and exploitation.
SO6: To contribute to halting and reversing biodiversity loss, enhancing ecosystem services and preserving habitats and landscapes.	6.1	Reversing biodiversity loss: Based on increasing farmland bird populations and improving the conservation status of other species and habitats of community interest in agricultural land or other areas affected by agricultural or forestry practices.
	6.2	Ecosystem services: Based on landscape features that contribute to ecosystem services by hosting relevant species (e.g. through pollination, pest control), biophysical processes (e.g. through erosion control, water quality maintenance) or cultural values (e.g. aesthetic value).

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025), based on Annex I of Regulation (EU) 2022/1475

In line with the needs identified in the SWOT analysis, all CSPs had to be designed to address the three environmental and climate SOs. However, the three SOs do not operate independently but are closely interconnected – healthy soils and clean water support biodiversity, biodiversity-rich landscapes enhance ecosystem resilience and climate mitigation interventions, such as carbon sequestration, contribute to both soil health and habitat preservation. Similarly, the support and uptake of a specific farm practice (see Box 1. Usefulness of the farm practice classification) may well result in multiple co-benefits, depending on the farm practice. For example, carbon farming techniques, such as agroforestry and regenerative agriculture, not only enhance soil carbon sequestration (SO4) but also improve soil fertility (SO5) and provide critical habitats for pollinators and wildlife (SO6). Another example is investments in precision nutrient management and sustainable irrigation, which contribute to water quality and efficiency (SO5) while reducing pollution impacts on aquatic ecosystems, thereby supporting biodiversity (SO6). However, it must be noted that, in some circumstances, very specific management practices may be required to address a particular environmental and climate challenge, which may not lead to benefits across the board or may lead to trade-offs.

Box 1. Usefulness of the farm practice classification

The Joint Research Centre (JRC) has developed a classification of farm practices [15] that are commonly used to achieve environmental and climate objectives. The EU CAP Network supported by the Evaluation Helpdesk, has used this classification to label many of the CSP interventions with environmental and climate objectives [16], which can be consulted through the Catalogue of CAP interventions [17]. In addition, the JRC has developed an online tool showing the evidence of the impact of specific farm practices on environmental and climate outcomes [18] and has made available a series of farm practice fiches [19]. These illustrate the co-benefits from the implementation of various farm practices and provide an overview of their expected impact on environmental and climate objectives. These farm practice resources provide useful information to gain a better understanding both of how the GA designed for the MS in question is expected to contribute to addressing environmental and climate objectives, as well as the interlinkages between different instruments and potential impacts in relation to the different environmental and climate objectives.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

A well-defined CSP intervention logic would ensure that the instruments designed to contribute to the objectives of climate action (SO4), sustainable resource management (SO5), and biodiversity conservation (SO6) work in synergy to enhance the overall contribution from the CAP's GA. Ideally, CSP instruments would be designed to maximise synergies across environmental and climate objectives while avoiding trade-offs or contradictions that could undermine long-term environmental and climate goals. Furthermore, instruments designed to address non-environmental and climate SOs should avoid perverse effects for the environment and climate.

If the intention is to evaluate the performance of the GA, the assessment should examine contributions to the key evaluation elements of SO4, SO5 and SO6 and the interplay among them, recognising that improvements in one area often generate co-benefits (or possible trade-offs) in another.

Because of the interlinkages between the environmental and climate objectives and the instruments designed to address them, as well as potential adverse effects from instruments designed to address non-environmental SOs, **the assessment of coherence is considered a fundamental part of the GA evaluation**. The aspects described in Section 2 are further elaborated on in Annex B – Coherence, including how an evaluation can tackle the various interconnections and trade-offs.

2.2.2. Links to other EU environmental and climate legislation

While contributing to SO4, SO5 and SO6, all CSPs also had to be designed to contribute to and be consistent with the objectives of EU environmental and climate legislation [20]. In particular, a subset of 12 legislative acts listed in Annex XIII of the CSP Regulation. In their design, the CSPs had to consider how the interventions could help achieve the targets set by these legislative acts in the assessment of environmental needs and demonstrate a coherent strategy to meet the ambitions of the various national plans deriving from these EU legislative acts, such as the PAFs, River Basin Management Plans (RBMP), the nitrate action programmes, the National Energy and Climate Plans (NECP), and the National Air Pollution Control Programmes (NAPCPs).

In addition to the legislation listed in Annex XIII of the CSP Regulation, a broader set of European and national legislative instruments and policies with environmental and climate objectives is relevant to the CSPs. When assessing the contribution of the CSPs and the GA to achieving the goals of these broader initiatives, it may also be relevant to consider other initiatives of a non-legislative nature, such as, for example, the coherence between the GA and certification schemes.

The table below contains the full list of the 12 legislative acts in Annex XIII of the CSP Regulation and a non-exhaustive list of additional relevant regulations and instruments. Annex B – Coherence further clarifies where these environmental and climate policies interact with the GA, and thus provides ideas for what aspects are most relevant to consider for the GA evaluation. Note that non-legislative acts and national legislation of individual MS are not listed in the table below, as these would have to be considered on a case-by-case basis depending on the initiatives operating in the specific MS.

15 European Commission Joint Research Centre, *A classification scheme based on farming practices, Publications Office of the European Union*, 2024. https://data.europa.eu/doi/10.2760/33560.
16 European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Labelling of interventions in CAP Strategic Plans by farming practices – Purpose and approach,* Brussels, 2024, https://eu-cap-network.ec.europa.eu/publications/labelling-interventions-cap-strategic-plans-farm-practices_en.
17 European Commission, Directorate-General for Agriculture and Rural Development, 'Catalogue of CAP interventions'. Available at: https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html.
18 European Commission's Joint Research Centre, *The JRC farming practices evidence library – This library synthesizes a large amount of scientific evidence to assess the effects of farming practices on sustainability outcomes, mainly regarding the environment, the climate, and agricultural productivity*, Publications Office of the European Union, 2025. https://data.europa.eu/doi/10.2760/9473570.
19 Ibid.
20 Article 109 (2) (v) Regulation (EU) 2021/2115 states that: "The intervention strategy shall demonstrate the consistency of the strategy and the complementarity of interventions across the Specific Objectives set out in Article 6(1) and (2) by providing: … (v) - how the environmental and climate architecture of the CAP Strategic Plan is meant to contribute to the achievement of, and be consistent with, the long-term national targets set out in or deriving from the legislative acts listed in Annex XIII".

Table 3. EU environmental and climate policies and relevance to the GA

Regulations and instruments	Relevant targets	National environmental planning tool
Regulations listed in Annex XIII of Regulation (EU) 2021/2115		
Habitats Directive 92/43/EEC. Birds Directive 2009/147/EC.	Maintains and restores all EU species and habitats of community interest protected under the two Directives to a favourable conservation status across their natural range within the EU.	PAF, Natura 2000 management plans, EU species and habitats action plans.
Land use, land use change and forestry (LULUCF) Regulation 2018/841 (last amended in 2023 by Regulation 2023/839).	Ensues that greenhouse gas emissions from land use, land use change or forestry are offset by at least an equivalent removal of CO_2 from the atmosphere in the period 2021 to 2030.	NECP
Effort Sharing Regulation 2018/842 (amended in 2023 by Regulation 2023/857).	Sets obligations for MS on binding GHG reduction.	NECP
Directive 2018/2001 on renewable sources (amended by Directive 2023/2413).	Establishes an overall policy for the production and promotion of energy from renewable sources in the EU.	NECP
Directive 2012/27/EU on energy efficiency (last amendment by Directive 2018/2002 and recast by Directive 2023/1791).	Sets the energy efficiency target and the needed reduction in consumption levels by 2030.	NECP
Regulation 2018/1999 on governance of energy and climate action (last amendment by Directive 2023/2413).	Requires MS to draft NECPs for 2021–2030 and regularly report on progress towards goals and targets through the NECP Reports (NECPRs).	NECP
EU Water Framework Directive 2000/60/EC.	Achieves good ecological and chemical status of surface waterbodies and good chemical and quantitative status of groundwater bodies.	RBMP
Nitrates Directive 91/676/EEC.	Reduces and further prevents water pollution by nitrates from agricultural sources.	Nitrate action plans.
Ambient Air Quality Directive 2008/50/EC.	Sets standards for air quality and targets in line with impacts on human health.	Air quality plans and action plans.
National Emissions reduction Commitment Directive 2016/2284/EU.	Sets national emission reduction commitments for MS and the EU for five important air pollutants.	NAPCP
Directive 2009/128/EC on the sustainable use of pesticides.	Reduces the risks and impacts of pesticide use on human health and the environment. Promotes the use of integrated pest management and non-chemical alternatives to pesticides.	Pesticide action plans.
Other relevant EU regulations and instruments		
Climate Adaptation Strategy COM(2021) 82.	Contribute to a more climate-resilient Europe by enhancing the preparedness and capacity to respond to the impacts of climate change at local, regional, national and EU levels.	National adaptation plans.

Nature Restoration Regulation (EU) 2024/1991.	Aims to restore degraded ecosystems, habitats and species on at least 20% of Europe's land and sea areas by 2030, and in all ecosystems in need of restoration by 2050. Legally binding targets of relevance to agriculture include: › Improve/re-establish areas of habitat types of community importance or habitats of species of community importance which are dependent on, or affected by, agriculture (30% by 2030, 60% by 2040, 90–100% by 2050); › Improve pollinator diversity and reverse the decline of pollinator populations by 2030, and thereafter achieve an increasing trend in pollinator populations under satisfactory levels are achieved; › Put in place measures to achieve an increasing trend at national level in at least two of the three indicators (grassland butterfly index, stock of organic carbon in cropland mineral soils, share of agricultural land with high-diversity landscape features); › Put in place measures to achieve a measured increase in common farmland bird index at national level; › Put in place measures to restore organic soils in agricultural use constituting drained peatlands; › Enhancing biodiversity in agriculture.	National restoration plans.
Farm to Fork strategy COM/2020/381.	Aims to make food systems fair, healthy and environmentally-friendly. Several targets of relevance to agriculture, such as: reducing 1) nutrient losses by at least 50%, reduce use of fertilisers by at least 20%; 2) the overall use of and risk from chemical pesticides by 50% and the use of more hazardous pesticides by 50%; 3) the sales of antimicrobials for farmed animals and aquaculture by 50%; and 4) increase organic farming to at least 25% of agricultural land.	-
Carbon Removals and Carbon Farming Regulation EU/2024/3012.	Facilitate the uptake of high-quality carbon removals to support the achievement of EU climate commitments.	-
EU Methane Strategy COM(2020) 663.	Reduce methane emissions in the energy, agriculture and waste sectors as identified in the EU's Efforts-Sharing Regulation (ESR).	NECP
Directive (EU) 2025/260 on Soil Monitoring and Resilience and EU Soil Strategy for 2030 COM/2021/699.	Aims to achieve healthy soils by 2050 by ensuring comparable data, coordinated assessment and improved protection.	-
Directive (EU) 2018/848 on organic production and Organic Action Plan COM/2021/141.	Sets out the principles of organic production and sets an action plan for the development of organic production.	National organic action plans.
Flood Directive 2007/60/EC.	Reduces the adverse consequences for human health, the environment, cultural heritage and economic activity associated with flood.	Flood risk management plans.
Regulation (EU) 2020/741 on minimum requirements for water reuse.	Sets minimum requirements for water quality and monitoring and provisions on risk management, for the safe use of reclaimed water.	-
EU Forest Strategy 2021 COM/2021/572.	Improves the quantity and quality of EU forests.	-
EU Pollinator Initiative COM/2023/35.	Sets out a framework for coordinated action to tackle the major causes of pollinator decline, improve knowledge and mobilise all actors across society.	Pollinator action plans.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

3. GA evaluation model and structure of guidelines

The consideration of the evaluation criteria and the type of outcomes that an evaluation will provide, depending on the angle chosen to approach the assessment, is also a crucial aspect in determining the scope of the evaluation. This aspect is discussed in Chapter 3.1. Chapter 3.2 presents the logic model of the approach proposed for these guidelines, Chapter 3.3 describes the structure of Annexes A-C, and Chapter 3.4 contains information on how the guidelines may be used, as well as overview tables for the content further elaborated in Annex A-C.

3.1. The proposed approach for assessing effectiveness, coherence and efficiency of GA

The EU Better Regulation Guidelines [21] define five main evaluation criteria: effectiveness, efficiency, coherence, relevance and EU-added value. The use of evaluation criteria provides a structured framework to analyse and assess the GA's design and functioning in a systematic way. This structured approach supports evaluations that deliver critical, evidence-based insights that inform policymaking and operational improvements. The criteria will guide the formulation of EQs, which help clarify which aspects of GA should be investigated.

These guidelines look deeper into how evaluations of the GA in relation to the effectiveness, coherence and efficiency criteria could be developed, with a particular emphasis on the coherence criteria. Relevance and EU added value might also be of relevance; however, guidance in relation to these criteria is not further developed in these guidelines. Effectiveness, coherence and efficiency are of core interest to analyse the impacts of the instruments chosen and the interaction among them, to understand how to maximise synergies and minimise trade-offs in a cost-effective way in the future to achieve maximum impact.

Although these guidelines propose to assess the effectiveness, coherence and efficiency of the GA, MS may choose to address only one or two of these evaluation criteria, and/or to use only some of the proposed EQs/FoS for the GA evaluation. The intention is that the guidelines serve as inspiration for defining the scope and evaluation framework for a GA evaluation, but the proposed approach should be adapted to the circumstances of the evaluation at hand. Thus, the guidelines may be used in a 'pick-and-mix' way.

Table 4. Topics addressed by the guidelines and corresponding evaluation criteria [22]

Topics addressed by the annexes to the guidelines	Corresponding evaluation criteria
The overall contribution of the GA towards SO4, SO5 and SO6, and the comparison of this contribution to that achieved through the 2014-2022 implementation of the CAP.	Effectiveness (Annex A – Effectiveness).
The interplay between: a) the instruments forming part of the GA; b) the GA instruments with the rest of the CSP; and c) the GA instruments with instruments external to the CSP.	Coherence (Annex B – Coherence).
The cost-effectiveness of the GA and the assessment of the administrative costs and the potential for simplification for stakeholders affected by the GA, e.g. administrations and beneficiaries.	Efficiency (Annex C – Efficiency).

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

21 European Commission, 'Better regulation guidelines and toolbox', 2023. Available at: https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en.

22 Note that these are the questions to be addressed through the work of the thematic working group, not the actual EQs proposed for the guidelines itself.

3.1.1. Effectiveness

Evaluating the effectiveness of the GA is about forming an evidence-based judgement on observed changes and delineating the role of the GA in driving these aggregate changes. Effectiveness analysis considers to what extent the GA has been successful in achieving the defined FoS [23] and contributing to SO4, SO5 and SO6.

An effectiveness assessment can examine how successful an individual instrument is in ensuring progress towards an objective. For example, it can assess the success of ENVCLIM in attracting farmers and land to organic agriculture, low fertilisation or no-till farming practices and estimate the effect of these practices on decreasing GHG emissions or increasing carbon sequestration, decreasing nitrogen surpluses on land, protecting soils from erosion or improving the status of farmland birds. However, to assess the effectiveness of the GA as a whole requires all instruments to be assessed as a bundle (but building on data from the individual instruments), against each of the three SOs (SO4, SO5 and SO6).

As explained under Section 1.2, in these guidelines, the starting point for the GA effectiveness assessment is identical to that proposed in the previous guidance [24] developed by the EU CAP Network [25]. Within the context of evaluating the CAP during the 2023-2027 programming period, the indicators defined in the performance and monitoring evaluation framework (PMEF) [26] are used for the assessment of effectiveness, although they may also be complemented by the use of other data sources and indicators as considered relevant by the MS and/or evaluators [27]. Most PMEF result and impact indicators are affected by the design of more than one instrument, and as such are useful for an assessment of joint effectiveness. As an example, contributions towards GHG emissions reductions could stem from:

- an ENVCLIM on organic agriculture;
- an eco-scheme promoting non-cultivated strips near watercourses;
- an investment intervention to manage manure;
- GAEC4 establishing buffer strips along water courses; and
- SMR2 in certain NVZ.

Consequently, the impacts from all these instruments may be reflected in PMEF I.10 [28]. Thus, the effectiveness of the interaction of various instruments is reflected in one composite indicator fed by more than one instrument, and in this particular example is an indicator of 'GHG emissions reduction'.

In addition, an effectiveness assessment could examine the changes to effectiveness over time, for example, whether the CSP's GA for the 2023-2027 programming period is more successful in advancing towards environmental and climate targets compared to the previous programming period, 2014-2022 [29]. Assessing ambition involves a comparison of effects, results, outputs or other, specifically expressed, ambitions in the CSP. Evaluating ambition is meaningful even if the two programming periods use different instruments. The assessment compares overall effects or results independent of the various instruments used to achieve them. This is the second part of the effectiveness assessment proposed in these guidelines.

Thus, the outcome of an assessment of a CSP's GA will reflect the overall progress made toward the environmental and climate objectives. If the assessment is designed to compare to the past, then it will also deliver conclusions with regard to the effectiveness of the current design compared to that of the past. However, the effectiveness assessment alone will not provide answers as to why and how certain impacts have been observed, e.g. what is the role of and contribution from the various GA and non-GA instruments. For this, an assessment of coherence is needed to complement the findings of the effectiveness analysis.

3.1.2. Coherence

Coherence (elaborated on in Annex B - Coherence) is a criterion of central importance for evaluating the GA because it allows for an examination of:

i. how well (or not) the different instruments forming part of the GA work together;
ii. how well (or not) they interact with other CSP interventions; and
iii. how well (or not) they interact with EU legislative instruments outside the CSP, as well as relevant national policies outside the CAP.

The first two aspects concern internal coherence, while the third concerns external coherence. While it is recommended to assess all three of these criteria, one may choose to focus on only one or two of them, depending on the outcome one is looking for. However, if a partial approach is chosen, then the design of the evaluation should recognise the aspects not considered and thus the limitations to be expected from the findings that will be observed.

23 As defined in Regulation (EU) 1475/2022, Annex I.
24 See footnote 6 for full FoS guidelines reference.
25 Note that where a MS has already undertaken an effectiveness analysis of SO4, SO5 and/or SO6 in line with what is proposed in the FoS guidance, then the GA guidance does not suggest to do an additional effectiveness assessment of only GA instruments, but rather to use the already undertaken effectiveness analysis of SO4/SO5/SO6 as the first building block for the GA assessment.
26 The PMEF was established by Regulation (EU) 2021/2115 and defines a common set of indicators (output, result, context and impact) against which MS report on their CSPs.
27 According to Annex I, Regulation (EU) 2021/2115, the impact Indicators related to SO4 are: I.9 "Improving the resilience of agriculture to climate change: Agricultural sector resilience progress indicator"; I.10 "Contributing to climate change mitigation: Greenhouse gas emissions from agriculture"; I.11 "Enhancing carbon sequestration: Soil organic carbon in agricultural land"; I.12 "Increasing sustainable energy in agriculture: Sustainable production of renewable energy from agriculture and forestry". The impact indicators related to SO5 are: I.13 "Reducing soil erosion: Percentage of agricultural land in moderate and severe soil erosion"; I.14 "Improving air quality: Ammonia emissions from agriculture"; I.15 "Improving water quality: Gross nutrient balance on agricultural land"; I.16 "Reducing nutrient leakage: Nitrates in ground water – percentage of ground water stations with nitrates concentration over 50 mg/l under Directive 91/676/EEC"; I.17 "Reducing pressure on water resource: Water Exploitation Index Plus (WEI+)"; I.18 "Sustainable and reduced use of pesticides: Risks, use and impacts of pesticides". The impact indicators related to SO6 are: I.19 "Increasing farmland bird populations: Farmland Bird Index"; I.20 "Enhancing biodiversity protection: Percentage of species and habitats of Community interest related to agriculture with stable or increasing trends, with a breakdown of the percentage for wild pollinators species"; I.21 "Enhancing provision of ecosystem services: Share of agricultural land covered with landscape features"; I.22 "Increasing agro-biodiversity in farming system: Crop diversity".
28 PMEF Impact Indicator I.10 "Greenhouse gas emissions from agriculture".
29 Corresponding to the requirement in CSP Regulation Article 105 (no backsliding).

To delimit the scope of the coherence analysis, the intervention logic of the CSP should be relied on, or if needed, revised and/or reconstructed. For the assessment of internal GA coherence (option i above), all instruments considered part of the GA according to the intervention logic of the CSP should be considered (see Section 2.1.2). In addition, to assess the interaction with other CAP interventions (ii), all CSP interventions influencing SO4, SO5 and SO6, regardless of whether these have positive or negative impacts, should be in the scope to assess the interaction with other CAP interventions.

As pointed out above, effectiveness assessments for SO4, SO5 and SO6 are essential input to carry out step (i). Similarly, to assess the coherence with non-GA instruments (ii) requires insights into the effects of non-GA instruments on GA implementation and the achievement of environmental and climate goals. For this, input from other CSP evaluations may be a useful source of information, such as CAP evaluations relating to SO1, SO2 and SO3.

Furthermore, an intervention logic detailing all the legislative instruments external to the CSP to which the CSP is intended to contribute should be created to assess external coherence (iii). In particular, the assessment should comprise the extent to which the impacts of the GA contribute to the achievement of the long-term targets of EU environmental and climate policy targets (e.g. for example those listed in Table 2. CAP environmental and climate SOs and key elements.), as required under Article 109 of the CAP SP Regulation (EU) 2022/1475 [30]. This is about assessing the extent to which the GA, and more broadly, CAP instruments, contribute to the effective implementation of EU environmental legislation in practice [31]. Regarding external coherence, evaluations of the implementation of environmental planning tools and listing of infringement cases can shed light on the level of coherence of CSP implementation with EU environmental regulations (e.g. implementation of measures in environmental sensitive areas such as NVZs).

The outcome of the coherence assessment as proposed will deliver results with regard to what instruments work in synergy, complement, overlap or even contradict each other in achieving progress towards the environmental and climate objectives. It should explain why certain design aspects yield synergistic or contradictory results, enabling conclusions about design changes that may improve the effectiveness of the overall GA toolkit. As such, a coherence analysis is a fundamental complement to an effectiveness analysis of the GA, as it tells you why and how the changes identified are being observed. To draw on the example from effectiveness above, whereas an assessment of impact indicators provides results on the overall impacts, the coherence analysis enables one to determine the reasons why the results observed were obtained, and how this can be traced back to the GA design, to the design of the entire CSP, as well as to the relationship to legislation external to the CAP. This allows the findings in relation to the effectiveness and efficiency of the GA to be explained and provides the reasons behind them. It also allows for recommendations on how to improve the effectiveness of the individual GA instruments, as the individual contributions from each instrument will be understood.

3.1.3. Efficiency

An assessment of efficiency is recommended to consider two aspects: first, how the GA's resources were used to generate changes, which points to a cost-effectiveness or cost-benefit assessment; second, what is the simplification and cost-reduction potential of the GA.

In efforts to optimise the joint effects of various instruments, the GA may have imposed a rather complex design and implementation process for multiple stakeholders, including the central and regional administrations and beneficiaries. Considering how the GA could be simplified and made more cost-effective, without compromising its contribution to environmental and climate objectives, may therefore be a desired outcome of an evaluation. If so, the efficiency criteria should be included in the evaluation's scope.

Due to its structure, an efficiency analysis of the GA differs from an efficiency analysis of individual environmental or climate interventions, as it focuses on how the GA's goals and components are intended to interact. The cost-effectiveness of the bundle of GA interventions is defined as the achieved effectiveness of the GA measured in physical outputs (e.g. tonnes of GHG reduced) compared to the cost of implementing it (where the costs include both the actual cost of providing support payments to beneficiaries and the administrative costs and burden for beneficiaries and the administration, e.g. MAs, paying agencies (PAs) etc.). If the cost-effectiveness of GA interventions has been evaluated in previous evaluations (e.g. for 2014–2022), the present results can be compared with previous findings. In specific cases, as for mitigation costs of GHG emissions, the cost-effectiveness of GA interventions can be assessed in relation to other funds, or when it exists, in relation to market prices (e.g. GHG emissions). In essence, and as further explained in Annex C – Efficiency on the assessment of efficiency, a GA cost-effectiveness assessment has to follow the timeline and baseline of the GA effectiveness analysis.

Thus, under these conditions, an effectiveness analysis is a prerequisite for undertaking the efficiency analysis, as it provides essential input. In addition, if a coherence analysis is undertaken in parallel, then this would, as for effectiveness, provide answers to the questions of why something is found to be more or less cost-effective, or why a certain burden is imposed from the design of the GA, and thus makes for a very useful complement to the efficiency analysis.

30 Commission Implementing Regulation (EU) 2022/1475 of 6 September 2022 laying down detailed rules for implementation of Regulation (EU) 2021/2115 of the European Parliament and of the Council as regards the evaluation of the CAP Strategic Plans and the provision of information for monitoring and evaluation: https://eur-lex.europa.eu/eli/reg_impl/2022/1475/oj/eng.

31 Note that these targets relating to EU environmental and climate policies would not be part of the effectiveness assessment. The effectiveness analysis does not necessarily include the use of target indicators from the environmental planning tools (e.g. good status under WFD) as these represent the combined impact of multiple pressures, not only agriculture/CAP. So this is a separate assessment that aims at identifying the effects on the targets of the environmental planning tools, which, according to the methodology presented in the coherence annex (Annex B), looks at coherence in terms of targeting and supported farm practices (overlap of CSP support with the ones identified by the environmental planning tools).

3.2. GA evaluation logic model

Figure 2 visualises the proposed approach to the three evaluation criteria developed in these guidelines, e.g. the GA evaluation logic model. The links between the three evaluation criteria for which guidelines have been developed are illustrated through red arrows. They show that:

a) the findings from the coherence analysis may provide answers to why and how the findings from the effectiveness and efficiency analysis are being observed; and

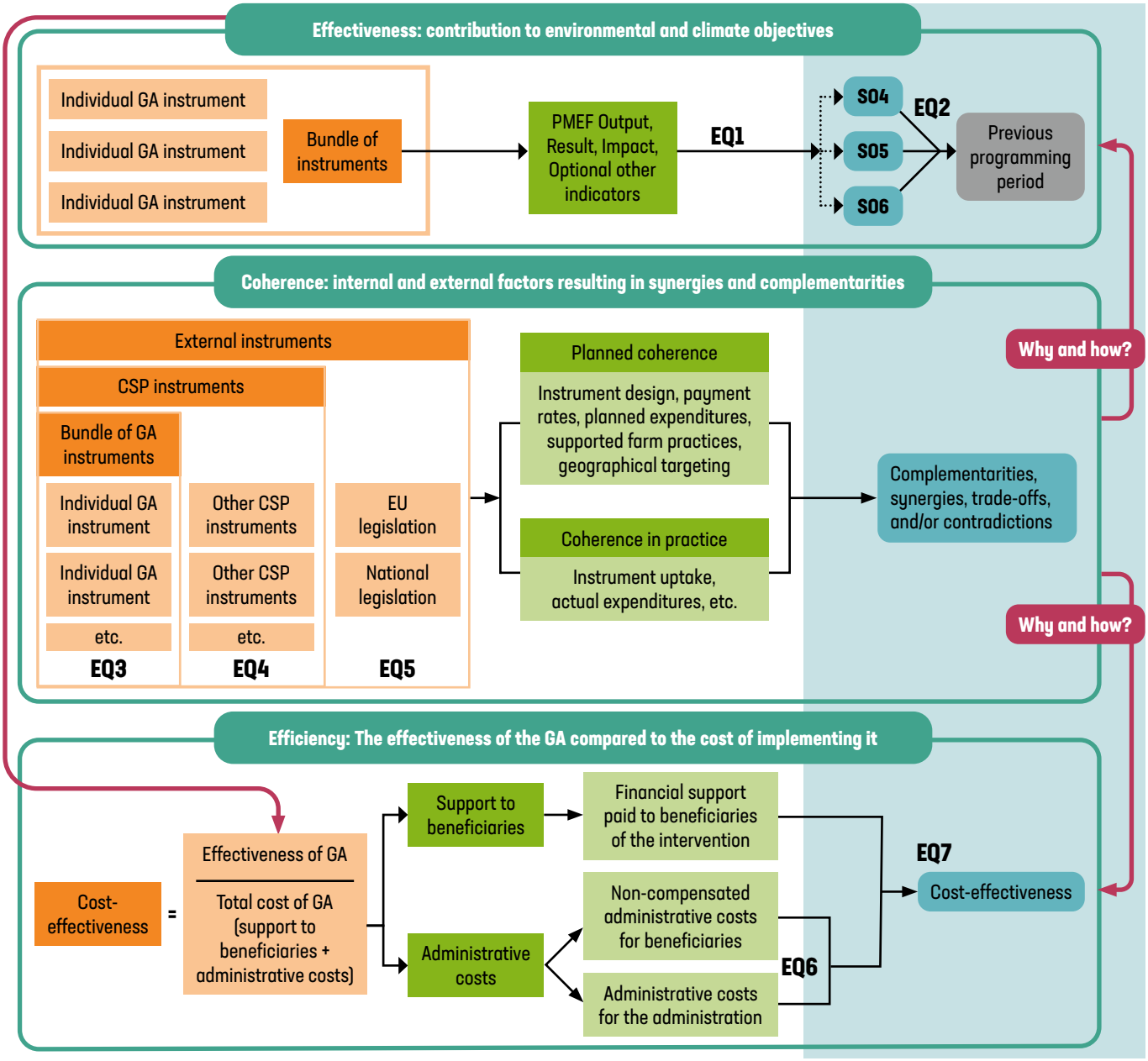
b) the findings from the effectiveness analysis are used as the starting point for the efficiency analysis.

The GA evaluation logic model also shows the main aspects to consider for each criterion by reflecting:

1. the 'inputs' to the assessment to the left (in orange), e.g. the types of instruments covered by the assessment for effectiveness and coherence, as well as the inputs needed to carry out the efficiency analysis;
2. the groups of indicators or type of data proposed for use in the assessment in the middle (in light green); and
3. the outcome that would be obtained from the assessment to the right (in green/blue).

Finally, it visualises which aspects of the three evaluation criteria the proposed EQs reflect, as explained in more detail below. For a full overview of the EQs, see Table 5, Table 6 and Table 7 below.

Figure 2. GA evaluation logic model: effectiveness, coherence, efficiency



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Figure 2 shows that, for **effectiveness**, the key for these guidelines is that all instruments forming part of the GA toolkit are assessed as a bundle (orange column), they are assessed in relation to PMEF indicators (output, results and impact indicators) but may also be assessed in relation to other/additional indicators (green column), which will provide outcomes – contributions to environmental and climate objectives (blue column) – in relation to each of the three SO (e.g. EQ1). Following this, the findings from the effectiveness analysis of the current programming period could be compared with those of the previous programming period (e.g. EQ2).

For **coherence**, three dimensions are proposed to be assessed: (i) the coherence amongst the various GA instruments (EQ3), the coherence between GA instruments and the rest of the CSP (EQ4), and the coherence with external EU environmental and climate legislative instruments (EQ5). Two steps for the analysis are required for all three dimensions. First, the planned coherence is analysed (e.g. the way in which the CSP has been designed to be coherent, which may already be available from the ex ante and SEA accompanying the CSP); and second – and the most important part of the analysis – 'coherence in practice' is assessed and compared to the planned coherence, e.g. what has actually happened in terms of uptake and farm practices supported is analysed. This will generate outcomes that allow conclusions to be drawn on the complementarities, synergies, and potential trade-offs and contradictions between the different instruments assessed (e.g. across all three dimensions).

For **efficiency**, the outcome from the effectiveness analysis serves as the starting point (e.g. a quantifiable indicator) to be compared with the total cost of implementing the GA. The costs consist of two parts: the actual financial support to beneficiaries, i.e. the direct costs, and the administrative costs, i.e. the indirect costs. The administrative costs are accrued and should be measured for both the administration and the beneficiaries. As such, an assessment of the administrative burden (EQ6) informs the overall outcome of the efficiency analysis, which delivers results on the cost-effectiveness of the GA (EQ7). To obtain results for the efficiency of the GA as a whole, the individual efficiency of the various instruments of the GA is combined.

3.3. Structure of the GA evaluation guidelines

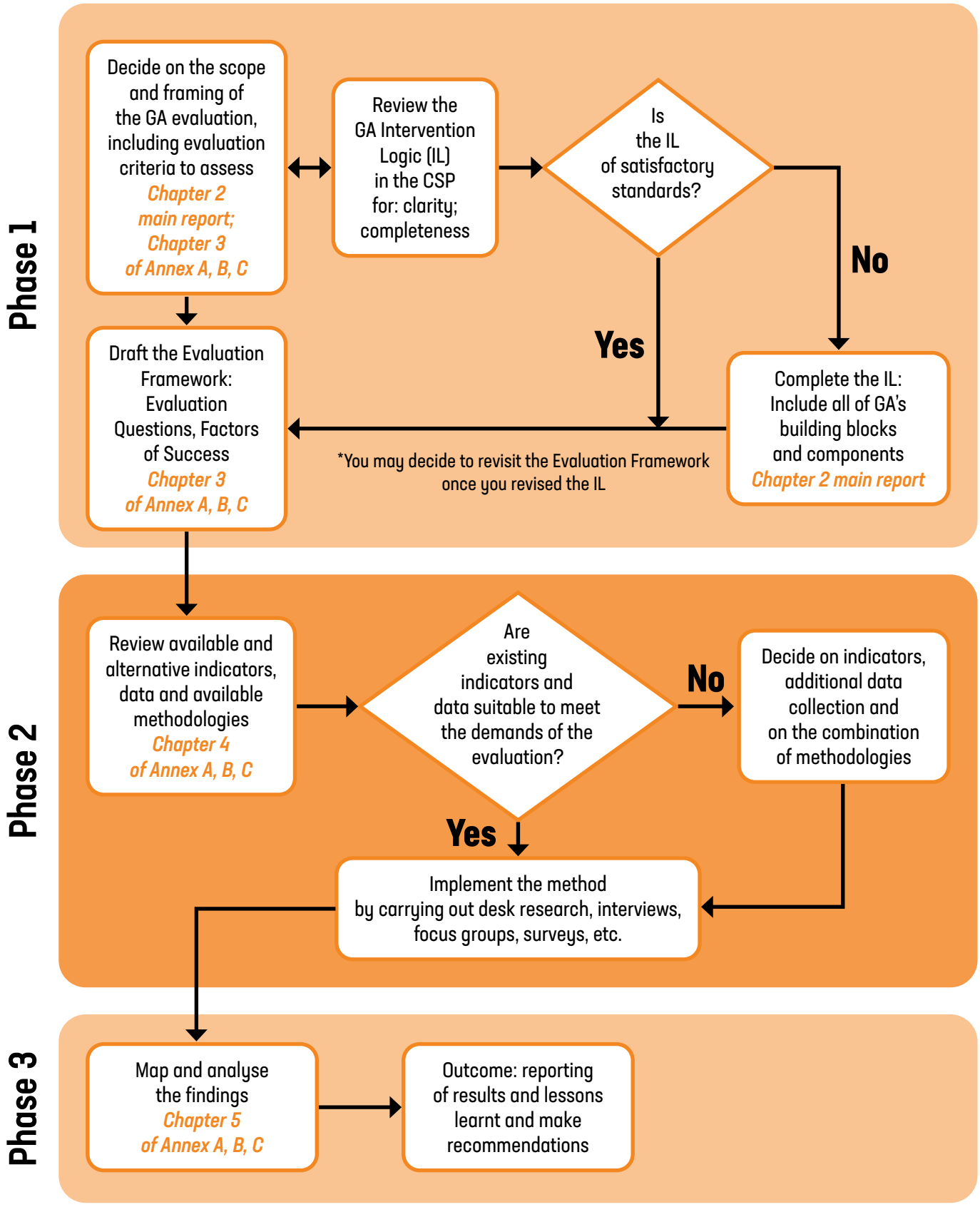
The process for evaluating the GA follows the same logic as any other evaluation. The evaluation flowchart below outlines the different phases of the evaluation, along with the steps that must be completed within each phase to undertake a full evaluation. The guidelines outlined in the three technical annexes (effectiveness, coherence, efficiency) have been designed to follow these phases. They also include a checklist under the second chapter of each annex explaining the various steps that would have to be undertaken in relation to these phases to complete the entire assessment as proposed in these guidelines. The flowchart in Figure 3 below provides information on where in the annexes you can find the relevant detailed information for the different steps.

The information contained in the annexes provides guidance on how to:

1. frame and narrow down the evaluation scope, e.g. how to go from the GA's building blocks to the drafting of EQs and FoS, including reflections on the important decisions that need to be made when drafting the evaluation framework (Phase 1);
2. decide on relevant indicators, data sources, and methodologies to use, and gain insights as to how to implement the selected method, including through practical examples (Phase 2); and
3. carry out the analysis, as well as understand what outcomes an evaluation structured according to these proposals could deliver, including the types of recommendations that could come from it (Phase 3).

For drafting these guidelines, certain vocabulary is repeated frequently and the way the terms are used is of importance for overall understanding. The Terminology section at the outset of the report contains the main terminology frequently used in the main report and annexes, to allow the reader to clearly follow the line of thought of the author.

Figure 3. GA evaluation flowchart



Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

3.4. Use of GA guidelines and overview of the content of Annex A-C

The work already carried out by the EU CAP Network for assessing RDP achievements and impacts [32] and the FoS guidelines [33] has been used as a basis for the development of these guidelines. This has been further elaborated to be more specific and precise in relation to the GA.

In relation to the **EQs and FoS,** as explained in Table 1, EQ1 [34] is an identical reflection of the EQ proposed for assessing effectiveness in relation to SO4, SO5 and SO6 in the FoS guidelines, and the FoS are those defined in Regulation (EU) 1475/2022, Annex I. For this reason, the full methodological framework for developing a judgement in relation to these FoS is not repeated in these guidelines. However, this EQ is an essential building block for carrying out the rest of the analysis, which is why it is included in this guidance, to give the reader the full picture. EQ2 [35] is a new EQ, proposed to allow for a comparison in relation to the past, as required by CSP Regulation Article 105 during the design phase of the CSPs.

The EQs proposed in relation to coherence (EQ3 to EQ5) [36] and efficiency (EQ6 and EQ7) [37] build upon those defined in the FoS guidance for the respective evaluation criteria, but have been adapted to be more specific in relation to the GA. The FoS proposed for those EQs have been developed by the EU CAP Network supported by the Evaluation Helpdesk and are not defined in any legal act.

Although a comprehensive approach for assessing the GA from the points of view of effectiveness, coherence and efficiency is recommended and proposed, when designing a GA evaluation, one may choose to address only one or two of these evaluation criteria, and/or to include only some of the proposed EQs/FoS for the criteria assessed. The intention is that the guidelines serve as inspiration for defining the scope and evaluation framework of a GA evaluation, but the proposed approach should be adapted to the circumstances of the evaluation at hand. Thus, the guidelines may be used in a 'pick-and-mix' way.

Similarly, numerous **indicators** and **data sources** are proposed for each of the three evaluation criteria. This is not to say that all these indicators/data need to be included in the scope of the evaluation framework, nor that additional indicators or other relevant data cannot be included. The proposals for indicators/data in this guidance are intended to spark ideas for relevant indicators and their use, which should be adapted to the availability of data and the resources for undertaking the evaluation. Nonetheless, several data sources are identified in each of the three annexes as relevant for informing the indicators. Many data sources can be used to construct indicators relevant to more than one evaluation criterion, thereby limiting the need for additional data gathering. For further information on how to overcome data gaps, it is recommended to consult the EU CAP Network publication on the CAP's evaluation framework [38].

The discussion of useful **methods** for assessment is non-exhaustive, but it aims to provide an introduction to how one could approach answering the EQs chosen, including the pros and cons of the different approaches. If one of the methods is chosen, additional research on this method may be needed to further inform the reader. The choice of method is always the outcome of a process of balancing evaluation resources to evaluation objectives and the availability of data and skills. As such, there is no single 'golden rule' guiding the choice of methods and the appropriateness of the chosen methodology. However, some recommendations for 'good practice' include the use of a mix of quantitative and qualitative methodologies, the triangulation of data sources to ensure robustness and the involvement of stakeholders and experts in the interpretation and validation of the derived results, conclusions and recommendations.

Finally, the annexes end with ideas for the types of **outcomes and recommendations** that could be expected if one follows the evaluation approach outlined. This is meant as illustrative examples to facilitate decisions on the scope of the evaluation at the outset, to avoid surprises at the end of the process. The examples of recommendations are also intended as inspiration for evaluators on the types of recommendations they may seek to deliver. This is further accompanied by the type of follow-up actions that these recommendations may result in, both for the MA and the PA. Again, this serves to exemplify what the evaluation may yield, enabling the right decisions about its scope from the outset. Note that our recommendation is to always combine the effectiveness assessment with an assessment of coherence to obtain more complete findings and allow for more comprehensive conclusions. As such, the recommendations stemming from the effectiveness assessment are, in this case, to use the findings to determine the scope and focus of the coherence and efficiency assessments, rather than recommending practical actions for the MA and/or PA, which will instead follow from the coherence and/or efficiency assessments.

All information is summarised by the evaluation criterion in Table 5, Table 6 and Table 7 below. This serves as an overview of the more detailed information in the annexes to allow the reader to decide which parts of the guidelines are most relevant for a deeper dive.

32 European Commission, Directorate-General for Agriculture and Rural Development – Unit C.4, Guidelines: Assessing RDP achievements and impacts in 2019 (Part I–IV), Brussels, 2018, https://eu-cap-network.ec.europa.eu/publications/assessing-rdp-achievements-and-impacts-2019_en.

33 See footnote 6 for full FoS guidelines reference.

34 EQ1: To what extent has the bundle of instruments used under the GA contributed to the effectiveness of the CSP in relation to each of the specific environmental and climate objectives?

35 EQ2: To what extent has the bundle of instruments used under the GA contributed to enhancing the environmental and climate effectiveness of the CSP compared to that of the previous programming period?

36 EQ3: To what extent and how have instruments forming part of the GA complemented each other and worked in synergy to deliver on the CAP environment and climate objectives? Were there trade-offs and/or overlaps?; EQ4: To what extent and how have non-GA instruments supported or hampered the GA in advancing the CAP environment and climate objectives?; EQ5: To what extent and how has the implementation of the GA contributed to achieving the long-term targets that derive from environmental and climate instruments?

37 EQ6: To what extent is the implementation of the GA simple in terms of administrative costs for beneficiaries and the administration?; EQ7: To what extent are the costs of GA implementation justified, given the effects it has achieved?

38 EU CAP Network, EU level CAP evaluation framework. Available at: https://eu-cap-network.ec.europa.eu/support/evaluation/evaluation-framework_en.

Table 5. Overview of proposed EQs, FoS, indicators, methods and potential outcomes from an assessment of effectiveness of the GA

Phase 1		Phase 2		Phase 3	
Evaluation questions	**Factors of success**	**Indicators**	**Examples of methods**	**Expected outcome**	**Potential use of outcome**
EQ1: To what extent has the bundle of instruments used under the GA contributed to the effectiveness of the CSP in relation to each of the specific environmental and climate objectives?	FoS 4.1.1-6.2.2 adapted to assess the success of the mix of GA instruments deployed (instead of CAP support in general) [39].	PMEF output, result and impact indicators for SO4, SO5 and SO6, and, where identified as relevant, possible additional indicators.	› Environmental-economic and econometric modelling approaches. › Propensity score matching (PSM). › Difference in differences (DiD) estimation. › Farming practice approaches.	› Net effects of bundle of GA instruments on environmental and climate indicators. › Contribution of GA towards achieving environmental and climate targets.	Input for coherence and efficiency analysis: › Coherence: Contributes to determining the scope and focus of the analysis of synergies and trade-offs and how these can be traced back to the GA design. › Efficiency: Determines the scope and focus of the efficiency analysis providing the nominator for the cost-effectiveness assessment.
EQ2: To what extent has the bundle of instruments used under the GA contributed to enhancing the environmental and climate effectiveness of the CSP compared to that of the previous programming period?	Environmental impacts increased compared to 2014-22.	Relevant PMEF and CMEF indicators, financial allocation.	Comparative assessment of impacts (2014-22 and 2023-27).	Changes in targets (results) and impacts compared to the previous programming period.	Lessons learnt on setting ambitious and realistic targets for the GA in the future.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

39 See footnote 6 for FoS guidelines reference. The numbering in the table (e.g. 4.1.1 for the FoS) has been maintained from the FoS guidance, and reflects the fact that the sub-questions correspond to SO4, SO5 and SO6.

Table 6. Overview of proposed EQs, FoS, indicators, methods, and potential outcomes and recommendations for assessment of coherence of the GA

Phase 1		Phase 2		Phase 3	
Evaluation questions	**Factors of success**	**Data**	**Examples of methods**	**Expected outcome**	**Expected recommendations (examples)**
EQ3: To what extent and how have instruments forming part of the GA complemented each other and worked in synergy to deliver on the CAP environment and climate objectives? Were there trade-offs and/or overlaps?	GA instruments complemented each other to deliver on the CAP environmental and climate objectives.	› Objective and scope of GA interventions. › Interventions supporting the same farm practices. › Overlay of implemented GA instruments. › Financial allocation and expenditures per type of intervention. › Enabling factors and barriers for uptake of (combination of) GA instruments. › Synergy in knowledge transfer and cooperation.	› Bibliographic analysis › Uptake and financial analysis › Spatial overlay analysis › Stakeholder consultations and qualitative analysis › Workshops/focus groups › Case study analysis	› Description and analysis of synergies and contradictions of the interplay between GA instruments. › Screening matrix mapping the strength and nature of interactions of GA instruments. › Diagnostic narrative on key design choices of the GA architecture.	› Improve articulation between GA instruments. › Enhance targeting and prioritisation. › Recalibrate payments. › Introduce or strengthen result-based schemes. › Strengthen performance framework.

Phase 1		Phase 2		Phase 3	
Evaluation questions	**Factors of success**	**Data**	**Examples of methods**	**Expected outcome**	**Expected recommendations (examples)**
EQ4: To what extent and how have GA and non-GA instruments worked in synergy in advancing the CAP environment and climate objectives?	The GA and non-GA instruments in CSP worked in synergy on advancing the CAP environmental and climate objectives.	› Objective and scope of non-GA interventions. › Overlay of implemented GA and non-GA instruments. › Financial allocation and expenditure per instrument type. › Enabling factors and barriers for uptake of (combination of) GA instruments arising from non-GA instruments.	› Same as EQ3.	› Description and analysis of synergies and contradictions of the interplay between GA and non-GA CAP instruments. › Screening matrix mapping the strength and nature of interactions of GA and non-GA instruments. › Diagnostic narrative on key design choices of the CAP architecture and design of non-GA instruments.	› Improve articulation between GA and non-GA instruments. › Enhance the role of specific interventions for systemic transitions (e.g. sectoral support). › Improve leverage of knowledge, innovation and cooperation.
EQ5: To what extent and how has the implementation of the GA contributed to achieving the targets and objectives of environmental and climate legislation and planning tools?	The implementation of the GA contributed to achieve specific targets and objectives of environmental and climate instruments.	› Overlay of implemented instruments and farm practices with areas prioritised under environmental planning tools. › CSP financial allocation and expenditures vs funding needs from environmental planning tools. › Stakeholder perception of CSP alignment with other policies.	› Same as EQ3.	› Description and analysis of synergies and contradictions between GA instruments and environmental planning tools. › Screening matrix on the strength and nature of interactions of GA and environmental planning tools. › Diagnostic narrative on key design choices (financial allocation, governance, etc.).	› Better targeting of the implementation of GA instruments to areas prioritised by environmental planning tools. › Greater alignment of CSP financial allocations with environmental needs. › Develop common or harmonised indicators across CAP and environmental planning instruments.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Table 7. Overview of proposed EQs, FoS, indicators, methods, and potential outcomes and recommendations for assessment of efficiency of the GA

Phase 1		Phase 2		Phase 3	
Evaluation questions	**Factors of success**	**Indicators**	**Examples of methods**	**Expected outcome**	**Expected recommendations**
eQ6: To what extent is the implementation of the GA simple in terms of administrative costs for beneficiaries and the administration?	The administrative costs of delivering the GA, both for beneficiaries and the administration, are minimised.	› Financial support paid to beneficiaries of the GA. › Adjustment and administrative costs for the administration. › Beneficiaries' administrative costs to submit support applications, implement GA operations and claim GA support. › Enforcement costs for the administration. › Number of proposed/ introduced simplification measures, e.g. number and type of measures that were or can be delivered with reduced costs for either the administration and/or the beneficiaries due to digitalisation, as well as the number and type of audits and controls that were or can be simplified or automated.	› Process mapping. › Survey-based and interview methods. › Case study analysis. › Administrative data and cost structuring tables (CSTs). › Standard cost model (SCM). › Cumulative cost assessment (CCA). › Expert validation and triangulation. › Scenario analysis.	› A map of primary administrative requirements. › A database of cost estimates. › Adjustment, administrative and enforcement costs for administration and beneficiaries. › Reduction in administrative costs. › Increased adoption of simplification measures. › Minimised delivery costs. › Stakeholder feedback on burden reduction. › Lower error and non-compliance rates. › Benefits in terms of reduced costs and enhanced acceptability.	› Further simplification of processes extended to eligibility, application and monitoring. › Harmonise data requirements, negotiate inter-agency data sharing, and develop joint data reporting portal. › Expand digitalisation. › Monitor participation change. › Implement simplified cost options. › Enhance coordination between authorities. › Tailor measures for small farms. › Communicate changes to farmers. › Measure cost changes.

EQ7: To what extent are the costs of GA implementation justified, given the effects it has achieved?	Implementation of the GA is cost-effective.	› Proportionality of costs and non-monetary benefits. › Degree of cost alignment with environmental and climate benefits (effectiveness analysis). › Expected permanence of supported interventions and long-term behavioural changes.	› Calculate and interpret various Cost-effectiveness ratios.	› Cost-effectiveness ratios. › Benchmarking results. › Payment calibration analysis. › Targeting efficiency.	› Simplification recommendations for increasing participation. › Improve targeting of measures. › Remove/merge underperforming measures. › Reallocate funds and adjust payment rates. › Enhance monitoring and data collection. › Adopt best practices from benchmarking.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Annex A – Effectiveness

This annex provides guidelines in relation to the assessment of the GA's effectiveness. It allows for an assessment of the overall contribution from the GA to SO4, SO5, and SO6, and for comparing this contribution with that achieved through the 2014-2022 implementation of the CAP.

A1 Rationale and scope of effectiveness guidance

A1.1 Rationale for assessing the effectiveness of the GA

The assessment of effectiveness is an essential, first building block for a GA evaluation, and the rationale for this is outlined in Chapter 3.1.1. As explained, it allows for obtaining results on the effectiveness of a bundle of instruments designed to contribute to SO4, SO5 and SO6, in relation to each of these objectives. The effectiveness assessment can be part of the GA evaluation, or the GA evaluation can build on effectiveness findings from evaluations undertaken separately for each of these SOs (see Chapter 1.2 for further explanations). When the effectiveness assessment is part of a GA evaluation, the proposed approach is identical to that proposed for an SO evaluation and builds on the EU CAP Network guidelines, such as the FoS guidance.

As explained in Chapter 1.2 and 3.1, for a GA evaluation, it is essential that the results of the effectiveness assessment are complemented by an internal and external coherence analysis of the interplay between the GA instruments to understand why and how the findings from the effectiveness assessment were obtained (Annex B – Coherence). Furthermore, understanding the effectiveness of the GA will allow its efficiency to be assessed by comparing the effectiveness with the cost of its implementation (see Annex C – Efficiency).

In addition, the guidelines recognise that the GA is a new concept, although compared to the past programming period, the only new elements of what is now called the GA are that the GAECs are now programmed as part of the CSPs and that eco-schemes have been introduced. With this said, by introducing the concept of GA, the intention was to increase the environmental/climate ambition of the CSPs and to ensure that they contribute directly to the achievement of EU environmental and climate objectives, also included as a requirement in the CSP Regulation [40]. Therefore, these guidelines also show how to compare current effectiveness to that of the previous programming period.

A1.2 Scope of the guidelines

In light of the overall evaluation of the GA, the guidelines on effectiveness provide input for an assessment of the extent to which the GA has contributed to achieving the environmental and climate objectives. Two aspects of effectiveness are covered:

- How to assess the joint impact from the GA in relation to the CAP environmental and climate objectives (focusing on bundles of GA instruments, but building on the individual interventions).
- How to compare the environmental ambition of the CSP 2023-2027 to the previous programming period.

As a starting point for these guidelines, it is important to highlight that MS are expected to assess the impacts of the CSPs in relation to all SOs [41]. The FoS guidelines [42] that have been previously developed by the EU CAP Network contain substantial guidance on how this can be done, by proposing evaluation frameworks, useful data and methods for calculating the indicators and netting out the impacts from the CAP. Previous RDP evaluation guidelines [43] also contain substantial guidance in this regard, which remains relevant.

Hence, the effectiveness guidelines here show how the existing guidance on assessing the environmental and climate impacts of CSP can be used and complemented by new methodological developments. The effectiveness guidelines in this annex outline how to approach the proposed evaluation questions (EQ1 to EQ2). As explained in Chapter 1.2, the effectiveness assessment is a necessary building block for the rest of the proposed GA assessment, including the coherence and efficiency analyses.

40 Regulation (EU) 2021/2115 Article 105.

41 Article 2 of the Commission implementing regulation for monitoring and evaluation, Regulation (EU) 2022/1475, outlines the evaluation requirements for MS during the implementation period of the CAP Strategic Plans. It states that MS must evaluate the impacts from their CSPs in relation to all SOs which are addressed in their plan, either by objective or by comprehensive evaluations covering several objectives.

42 See footnote 6 for FoS guidelines reference.

43 See footnote 32 for RDP achievements and impacts (2018).

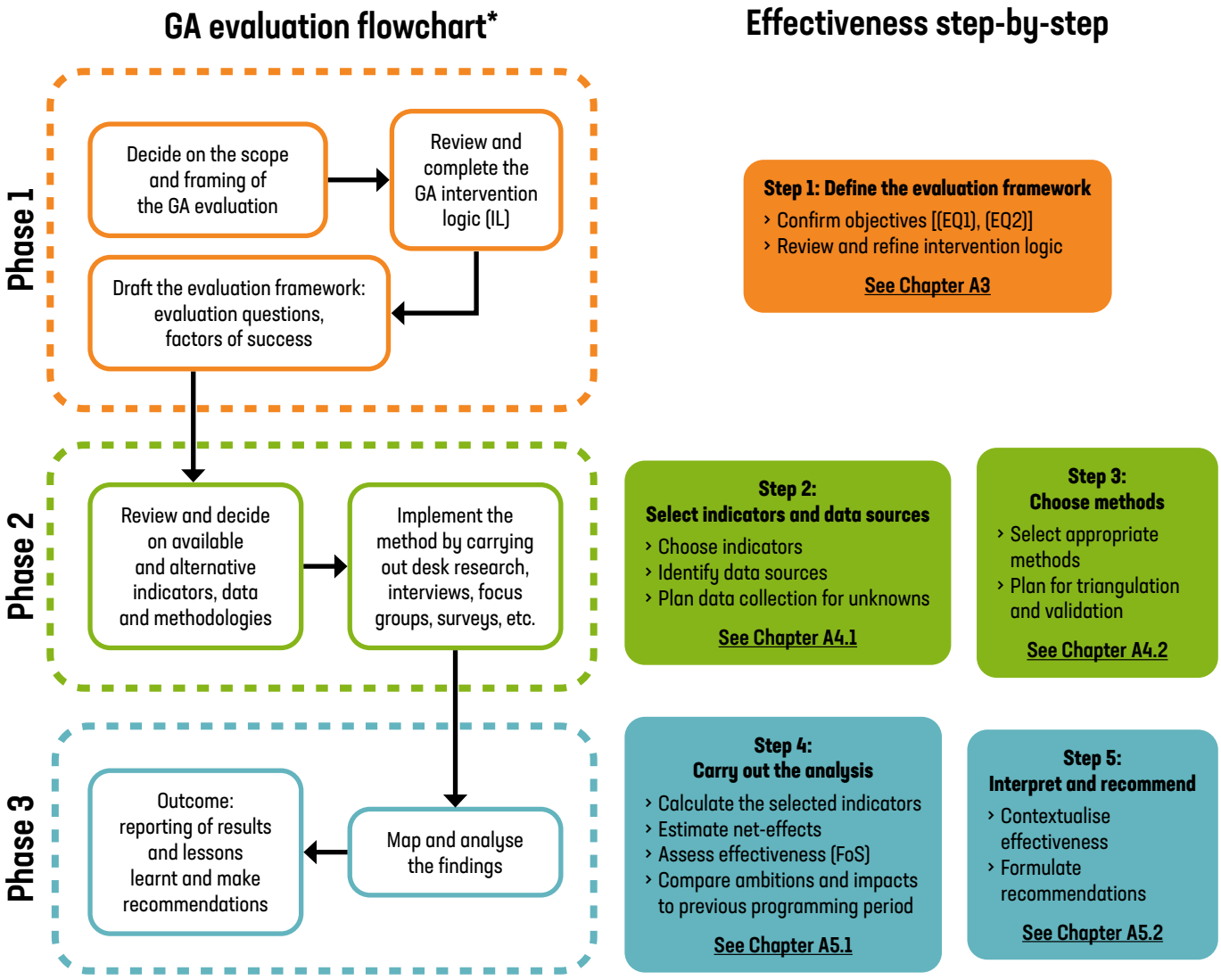
A2 Key aspects of the effectiveness guidelines

A key aspect of these guidelines is the focus on assessing the extent to which the GA (i.e. a bundle of instruments) contributed to the effectiveness of the CSP interventions in relation to each of the environmental and climate objectives of the CAP (SO4, SO5 and SO6).

There is evidence that synergies or unintended trade-offs between different GA instruments can affect, positively or negatively, the GA's overall effectiveness in relation to climate and environmental objectives. For example, a modelling study [44] evaluating the effects of selected GA instruments, including conditionality, eco-schemes and ENVCLIM, found that combining these instruments can significantly boost soil conservation and prevent land abandonment far more than any single measure, demonstrating that integrated policy mixes produced by the GA achieved outcomes that would not be possible with any individual instrument acting alone. Another aspect to consider is that behavioural evidence suggests that overly strict mandatory requirements can crowd out voluntary engagement [45]. Consequently, the interplay and interdependence between different GA instruments call for an effectiveness assessment that accounts for the cumulative impact of the bundle of GA instruments.

The guidance on the assessment of the GA effectiveness follows the three phases of the evaluation flowchart, also applied for the coherence and efficiency assessments, as shown in Chapter 3.3. In the visual below, these three phases are translated into more practical steps – a checklist – for the effectiveness analysis, which will be further described in the following chapters.

Figure 4. Step-by-step process for the assessment of the effectiveness of the GA



*See the full GA evaluation flowchart in Chapter 3.3

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

44 Vergamini, D. et al., *Simulating policy mixes to reduce soil erosion and land abandonment in marginal areas: A case study from the Liguria Region (Italy),* Land Use Policy, 143, 2024, 107188. https://doi.org/10.1016/j.landusepol.2024.107188.

45 Barreiro-Hurle, J. et al., *Willing or complying? The delicate interplay between voluntary and mandatory interventions to promote farmers' environmental behavior*, Food Policy, 120, 2023. https://doi.org/10.1016/j.foodpol.2023.102481.

A3 Phase 1: Defining the evaluation framework for assessing the effectiveness of GA

A3.1 Deciding on the framing of the effectiveness evaluation

Determining the scope and framing the effectiveness evaluation helps provide clarity and completeness in capturing the relevant aspects of effectiveness (see Figure 3. GA evaluation flowchart). For the GA, this includes **identifying key evaluation elements of SO4, SO5 and SO6**, prioritised in the CSP through the intervention logic in response to the environmental and climate needs identified.

Once the scope is decided upon, the appropriate key **EQs and FoS** can be defined and selected. A decision should be made about whether the analysis should focus on the current programming period only, and which of the environmental and climate objectives it should cover (proposed EQ1) or if the effectiveness assessment should also analyse the extent to which the GA has led to an increased ambition of advancing towards environmental and climate targets compared to the previous programming period (proposed EQ2). In addition to the two main EQs, FoS need to be defined for the selected key elements to enable judgments to be made in relation to the proposed EQ.

As part of the framing process, a detailed review of the **intervention logic** should be carried out, both to inform the framing and in case it needs to be revised to fit the purposes of the evaluation at hand. This review involves the identification of the GA instruments in the CSPs which are to be assessed. Particular attention needs to be paid to the links between these instruments and their expected impacts. This is to ensure that the effectiveness of the bundle of GA instruments is evaluated jointly, rather than focusing on one particular instrument. This phase should ensure that the intervention logic transparently represents for SO4, SO5 and SO6, the mandatory practices implemented as part of conditionality, the expected uptake of voluntary interventions, as well as the rules and definitions in place which impact the concerned objectives. The intervention logic should also consider assumptions related to effectiveness, such as expected results and impacts, the timescale over which environmental and climate benefits are expected (e.g. long-term impacts in relation to improved water quality (I.15) or enhanced biodiversity protection (I.20)), and the cumulation of effects achieved in implementing bundles of instruments under the GA. See Chapter 2.1.2 for further guidance.

A3.2 Proposed evaluation questions and FoS

Two main EQs are proposed for assessing the effectiveness of the GA. These are broken down into sub-questions and accompanying FoS reflecting the various evaluation elements. The EQs and related FoS are set out in Table 8 and strongly build on previous guidelines for evaluating the effectiveness criteria [46] and the recommended FoS included in Annex I of Regulation (EU) 2022/1475 [47].

46 See footnote 6 for full FoS guidelines reference.

47 Commission Implementing Regulation (EU) 2022/1475 of 6 September 2022 laying down detailed rules for implementation of Regulation (EU) 2021/2115 of the European Parliament and of the Council as regards the evaluation of the CAP Strategic Plans and the provision of information for monitoring and evaluation, http://data.europa.eu/eli/reg_impl/2022/1475/2024-07-26.

Table 8. EQs and FoS for GA effectiveness* [48]

Evaluation questions	FoS
EQ1: To what extent has the bundle of instruments used under the GA contributed to the effectiveness of the CSP in relation to each of the specific environmental and climate objectives? EQ1 sub-question depending on key elements identified in the intervention logic of the CSP: (4.1) To what extent has the GA enhanced the contribution of the CSP interventions to achieving the 2050 objective of climate neutrality in the EU, primarily by reducing GHG emissions, increasing carbon sequestration and promoting production and use of sustainable energy? (4.2) To what extent has the GA enhanced the support of the CSP interventions for the EU's agriculture, forestry and rural areas to reduce vulnerability, strengthen resilience and enhance adaptive capacity to climate change? (5.1.1) To what extent has the GA enhanced the contribution of the CSP interventions to improving air quality, including a reduction in chemical substances? (5.1.2) To what extent has the GA enhanced the contribution of the CSP interventions in fostering sustainable development and effective management of water resources, including a reduction in the dependency on chemical pesticides? (5.1.3) To what extent has the GA enhanced the support of the CSP interventions for sustainable development and effective management of soil resources? (6.1) To what extent has the GA enhanced the contribution of the CSP interventions to halting and reversing biodiversity loss on agricultural and forest land? (6.2) To what extent has the GA enhanced the contribution of the CSP interventions to enhancing ecosystem services?	4.1.1 GHG emissions in agriculture are decreasing, due to the mix of GA instruments deployed. 4.1.2 Soil organic carbon (SOC) sequestration is increasing or maintained due to the mix of GA instruments deployed. 4.1.3 Renewable energy production capacity is increasing due to the mix of GA instruments deployed. 4.2.1 The resilience of agriculture to climate change is increasing due to the mix of GA instruments deployed. 5.1.1.1 Ammonia emissions in agriculture are decreasing due to the mix of GA instruments deployed. 5.1.2.1 Nutrient balance on agricultural land is improving due to the mix of GA instruments deployed. 5.1.2.2 Nutrient leakage is decreasing due to the mix of GA instruments deployed. 5.1.2.3 Pressure on natural water reservoirs is decreasing due to the mix of GA instruments deployed. 5.1.2.4 The use and risk of chemical pesticides and the use of more hazardous pesticides are decreasing due to the mix of GA instruments deployed. 5.1.3.1 Soil erosion is decreasing due to the mix of GA instruments deployed. 6.1. Biodiversity related to agricultural land is improving or, at least, biodiversity loss is halted due to the mix of GA instruments deployed. 6.1.2 Biodiversity in Natura 2000 areas affected by agriculture or forestry is improving or, at least, biodiversity loss is halted due to the mix of GA instruments deployed. 6.1.3 Agro-biodiversity is increasing due to the mix of GA instruments deployed. 6.2.1 Trends of pollinators are improving or, at least, stable due to the mix of GA instruments deployed. 6.2.2 The area covered by landscape features in agricultural land is increasing or maintained due to the mix of GA instruments deployed.
EQ2: To what extent has the bundle of instruments used under the GA contributed to enhancing the environmental and climate effectiveness of the CSP compared to that of the previous programming period?	Environmental impacts increased compared to 2014-22.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

NB. Note that the numbering in Table 8 (e.g. 4.1 for the first sub-question and 4.1.1 for the accompanying FoS) has been maintained from the FoS guidelines and reflects the fact that the sub-questions correspond to SO4, SO5 and SO6.

48 The numbering in Table 7 (e.g. 4.1 for the first sub-question, and 4.1.1 for the accompanying FoS) has been maintained from the FoS guidance (see footnote 6 for FoS guidelines reference) and reflects the fact that the sub-questions correspond to SO4, SO5 and SO6.

EQ1: To what extent has the bundle of instruments used under the GA contributed to the effectiveness of the CSP in relation to each of the specific environmental and climate objectives?

EQ1 reflects an analysis of the extent to which the GA has been effective in relation to each of the different environmental SO. It relates to the key elements of SO4, SO5 and SO6 that have been identified and prioritised in the intervention logic of the CSP. The FoS are identical to those described in the FoS guidelines [49] and recommended in Annex I of Regulation (EU) 2022/1475, but adapted to focus on the GA instead of on CAP support more generally. Depending on the framing of the assessment chosen, in line with the intervention logic, evaluators might want to define additional, more specific FoS (e.g. for biodiversity-related key element 6.1, additional specific FoS could directly relate to farmland birds, species and habitats of community interest, high diversity landscape features or pollinators). And again, depending on the framing of the assessment and consistent with the intervention logic, one, several or all key elements could be assessed.

EQ2: To what extent has the bundle of instruments used under the GA contributed to enhancing the environmental and climate effectiveness of the CSP compared to that of the previous programming period?

EQ2 assesses whether the GA has increased the effectiveness of the CSP interventions compared to the previous programming period. Assessing changes in environmental and climate ambition may involve comparing impacts, e.g. through the use of a result matrix summarising impact and additional indicators, their contribution to SO4, SO5 and SO6, as well as the policy targets set or the inputs or outputs related to the ambition level (see Chapter A5 Phase 3: Analysis, outcome and recommendations for more details). Evaluating the environmental ambition of instruments is meaningful even if the two programming periods use different bundles of instruments. The assessment compares overall effects or results independent of the various instruments used to achieve them.

Overall, the EQ and FoS relating to effectiveness benefit from being applied and interpreted together with the EQs and FoS for the coherence analysis.

A4 Phase 2: Selecting indicators, data sources and methods

Chapter 4 provides guidance on Phase 2 of the evaluation process – the identification and selection of relevant indicators and methods for assessing the effectiveness of the GA.

A4.1 Proposed indicators and data sources

Generally, the selection of indicators and methods for an effectiveness assessment of the GA needs to consider what is feasible (i.e. what combinations of data, indicators and methods are available and suitable to answer the EQs), the requirements (i.e. what data/indicators/methods/approaches are required to assess the impacts and to answer the EQs), and the consequences of the choices (i.e. what implications do the decisions at different stages have for the cost and quality of the evaluation).

A4.1.1 Assessment of effectiveness of GA instruments in relation to SO4, SO5 and/or SO6

The PMEF indicators provide a comprehensive picture of indicators to include in the assessment at the outset, as for any SO evaluation. Thus, these indicators form the backbone of what should be assessed in a GA effectiveness evaluation. Table 6 provides an overview of the impact indicators and result indicators, along with the relevant main data sources. The use of additional indicators (based on other sources of relevant data) alongside the PMEF indicators can set the context, emphasise particular aspects of the FoS, where relevant, or address gaps.

Because the same approach is proposed for the GA evaluation as for SO evaluations (see Section 1.2), the guidelines on the FoS are useful also in this case, and provide – for each SO and impact indicator – a summary of indicators, data sources and support material for evaluation methods to assess net-effects. Several guidance documents and tools (e.g. indicator fiches [50]) exist on impact indicators (and related result indicators) to assess the effectiveness of CSP interventions in relation to SO4, SO5, and SO6, and can be consulted for detailed descriptions of the indicators, data sources and evaluation methods. Some of these documents and tools were also developed in the context of the CMEF for the previous CAP period but remain valid for the PMEF [51] [52].

Impact indicators and complementary result indicators capture the effects of multiple GA instruments and, as such, the principle of evaluating the effects of multiple CSP interventions programmed in relation to one SO remains the same when considering a GA evaluation. Therefore, the approach developed in previous guidance is also valid in this situation. And if a MS has already undertaken an effectiveness analysis of SO4, SO5 and/or SO6 in line with what is proposed in the FoS guidance, then the already undertaken effectiveness analysis of SO4, SO5 and SO6 can be used as the first building block for the GA assessment.

49 See footnote 6 for FoS guidelines reference.

50 Context and Impact indicators 25/10/2024 – Version 10.0, page 90: https://agriculture.ec.europa.eu/document/download/b7b8a856-e6d5-48fc-abc2-acdbda887e34_en?filename=pmef-context-impact-indicators_en.pdf.

51 Fiche CRI 19 of the European Commission, Directorate-General for Agriculture and Rural Development – Unit C.4, 'Updated fiches for Complementary Result Indicators No 13, 14, 15, 18 and 19 – Working Package 2', Brussels, 2020. Available at: https://eu-cap-network.ec.europa.eu/publications/working-package-2-working-document-updated-fiches-complementary-result-indicators-no_en.

52 Context and Impact indicators 25/10/2024 – Version 10.0, page 68: https://agriculture.ec.europa.eu/document/download/b7b8a856-e6d5-48fc-abc2-acdbda887e34_en?filename=pmef-context-impact-indicators_en.pdf.

Table 9. Indicators and data sources for assessing GA effectiveness

Indicator name	Data source(s)	Observations/comments
I.10 Greenhouse gas emissions from agriculture (FoS 4.1.1).	Geospatial data sources for meeting IPCC approach 3 for LULUCF, such as services from the Copernicus programme, Land Parcel Information System (LPIS)/ Integrated Administrative Control System (IACS), Land Use/Cover Area frame Survey (LUCAS) and others compliant with the INSPIRE directive [53].	Corresponds to indicator I.07 of the CMEF, for which Evaluation Helpdesk guidelines on how to assess the indicator are available [54] including the calculation of the complementary result indicator CRI18 Reduced emissions of methane and nitrous oxide of the CMEF [55].
I.11 Soil organic carbon in agricultural land (FoS 4.1.2).	LUCAS soil survey observations for 2018 and 2009; Estimated SOC measurements produced by JRC; National soil surveys [56].	Corresponds to indicator I.12 of the CMEF.
I.14 Improving air quality: Ammonia emissions from agriculture (FoS 5.1.1).	National scale emission data available through the European Environment Agency (EEA) website; Eurostat crop statistics and Farm Structure Surveys.	Detailed information available in indicator fiches [57]. Corresponds to the result indicator CRI19 of the CMEF [58].
I.15 Improving water quality: gross nutrient balance on agricultural land (FoS 5.2.1).	Statistics of Agricultural Input and Output (SAIO) fertilisers, crop and livestock statistics (Eurostat and FAO database); National inventory submissions to the United Nations Framework Convention on Climate Change (UNFCCC) and Convention on Long-Range Transboundary Air Pollution (CLRTAP).	Detailed information available in Indicator fiche [59 60].
I.16 Reducing nutrient leakage: Nitrates in groundwater (FoS 5.2.2).	Data from the Nitrates Directive reporting system at national and river basin level; Nutrients in freshwater: data via the WISE/SOE data flow annually.	
I.17 Reducing pressure on water resource: Water Exploitation Index Plus (WEI+) (FoS 5.2.3).	WISE SoE 3; Eurostat and the Organisation for Economic Co-operation and Development (OECD) joint Questionnaire on Inland Waters; National Statistical Offices; E-OBS gridded dataset (on hydro-climatic variables).	Good practice, but not obligatory to quantify the net contribution of the CAP support.

53 Directive 2007/2/EC of the European Parliament and of the Council of 14 March 2007 establishing an Infrastructure for Spatial Information in the European Community (INSPIRE): https://eur-lex.europa.eu/eli/dir/2007/2/oj/eng.
54 See footnote 6 for FoS guidelines reference., and See footnote 32 for RDP achievements and impacts (2018).
55 See footnote 51 for Updated fiches for Complementary Result Indicators No 13, 14, 15, 18 and 19.
56 https://esdac.jrc.ec.europa.eu/resource-type/datasets.
57 European Commission, Context and Impact indicators 25/10/2024 – Version 10.0: https://agriculture.ec.europa.eu/system/files/2023-02/pmef-context-impact-indicators_en.pdf.
58 See footnote 51 for Updated fiches for Complementary Result Indicators No 13, 14, 15, 18 and 19.
59 European Commission, Context and Impact indicators 25/10/2024 – Version 10.0: https://agriculture.ec.europa.eu/system/files/2023-02/pmef-context-impact-indicators_en.pdf.
60 Ibid.

I.18 Sustainable and reduced use of pesticides: Risks, use and impacts of pesticides (FoS 5.2.4).	Trends in Harmonised Risk Indicators (EC); Eurostat – Pesticides sales; Databases on interventions for decreasing pests and diseases.	Good practice, but not obligatory to quantify the net contribution of the CAP support.
I.13 Reducing soil erosion: Percentage of agricultural land in moderate and severe soil erosion (FoS 5.3.1).	JRC; European Soil Data Centre (ESDAC); LUCAS Topsoil 2009; European Soil Database; Corine Land Cover 2006/2012; Rainfall Erosivity Database in Europe; Copernicus Remote Sensing; Eurostat Statistics; Digital Elevation Model (DEM); Good Agricultural Environmental Conditions (GAEC); LUCAS Earth Observations 2009/2012/2015; Farm Structural Surveys; LPIS/IACS.	Good practice, but not obligatory to quantify the net contribution of the CAP support. JRC estimates the rate of soil loss from water erosion and the Percentage of agricultural land at risk of moderate and severe soil erosion, according to the availability of LUCAS Soil survey data.
I.19 Increasing farmland bird populations: Farmland Bird Index (FoS 6.1.1).	European Bird Census Council (EBCC) and Pan-European Common Bird Monitoring Scheme (PECBMS); National bird/biodiversity monitoring schemes; Farm Structural Surveys and other national agricultural databases; LPIS/IACS.	Corresponds to I.08 of the CMEF.
I.20 Enhancing biodiversity protection: Percentage of species and habitats of Community interest related to agriculture with stable or increasing trends (FoS 6.1.2 and 6.2.1).	Reporting in accordance with Article 17 of the Habitats Directive on the status and trends of habitats and species of Community interest related to agricultural areas; Farm Structural Surveys and other national agricultural databases; LPIS/IACS.	New indicator added in this programming period. Focus on establishing attribution pathways, how the adoption of certain farm practices promoted by agricultural policy measures affects species and habitats of Community interest.
I.22 Increasing agro-biodiversity in farming system: Crop diversity (FoS 6.1.3).	Farm Structure Surveys; FADN; LPIS/IACS.	The indicator is a continuation of the result indicator R.11_PI of the CMEF.
I.21 Enhancing provision of ecosystem services: Share of agricultural land covered with landscape features (FoS 6.2.2).	LUCAS-landscape features module; Copernicus Land Monitoring Service fed with LPIS/IACS.	

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

The guidelines on FoS [61] and the guidelines on addressing data gaps [62] also identify additional indicators that can complement the result and impact indicators. These include different context indicators of the PMEF as well as non-PMEF indicators that can add value to the effectiveness assessment. For example, in relation to pollinators and other biodiversity-related issues (SO6), the grassland butterfly index and pesticide residues in soils are suggested as additional indicators. The use of additional indicators should be carefully considered, taking into account the costs, data availability, and suitability and added value for the effectiveness assessment. Additional indicators can be helpful to quantify net results and impacts if the data for PMEF indicators are not sufficient or if gaps need to be filled. Additional indicators may also be qualitative in nature (e.g. degree of perceived change by stakeholders based on a Likert scale) to complement the quantitative evidence or in the absence of any alternative quantifiable evidence.

In addition to the data sources listed in Table 6, a future source of data for evaluations will be the disaggregated data on interventions and beneficiaries, DIB (Articles 9 and 10, and Annex IV Regulation (EU) 2022/1475). The DIB module became available in 2024 in the System for Fund Management in the European Union (SFC2021) production environment, under the menu 'MONITORING > Data on Monitoring and Evaluation > Interventions/Beneficiaries (EAGF, EAFRD)'. The disaggregated data have been set up to cover all interventions in the form of direct payments and all RDP interventions that are of relevance for the GA. It also provides information on farmers and other beneficiaries receiving support under interventions covered by the integrated administration and control system. The disaggregated data will be reported by MS per agricultural financial year.

A4.1.2 Assessment of the effectiveness of GA instruments compared to the previous programming period

To assess the effectiveness of GA instruments relative to the previous period, PMEF indicators from 2023–2027 can be compared with the corresponding CMEF indicators from 2014–2022. Such a comparison is possible for PMEF impact indicators for which corresponding impact and result indicators existed under the CMEF. Table 10 provides an overview of those PMEF impact indicators for which corresponding impact and result indicators existed under the CMEF.

Table 10. PMEF indicators (2023–27) and corresponding CMEF impact and complementary result indicators (2014–22)

PMEF impact indicator	CMEF impact and result indicators
I.10 Greenhouse gas emissions from agriculture (FoS 4.1.1).	I.07 Emissions from agriculture. CRI18 Reduced emissions of methane and nitrous oxide.
I.11 Soil organic carbon in agricultural land (FoS 4.1.2).	I.12 Soil organic carbon in arable land.
I.14 Improving air quality: Ammonia emissions from agriculture (FoS 5.1.1).	CRI 19 Reduced ammonia emissions.
I.15 Improving water quality: Gross nutrient balance on agricultural land (FoS 5.2.1).	I.11 Water quality (Indicator 1 Gross Nutrient Balance).
I.16 Reducing nutrient leakage: Nitrates in groundwater (FoS 5.2.2).	I.11 Water quality (Indicator 2 Nitrates in Freshwater).
I.17 Reducing pressure on water resource: Water Exploitation Index Plus (WEI+) (FoS 5.2.3).	CRI 13 Increase in efficiency of water use in agriculture.
I.13 Reducing soil erosion: Percentage of agricultural land in moderate and severe soil erosion (FoS 5.3.1).	I.13 Soil erosion by water.
I.19 Increasing farmland bird populations: Farmland Bird Index (FoS 6.1.1).	I.08 Farmland bird index.
I.22 Increasing agro-biodiversity in farming system: Crop diversity (FoS 6.1.3).	R.11 Crop diversity.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025) [63]

61 See footnote 6 for FoS guidelines reference.
62 European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Addressing data gaps to evaluate CAP Strategic Plans. Report of the Good Practice Workshop, 8-9 June 2023, Malmö, Sweden*, Brussels, 2023. Available at: https://eu-cap-network.ec.europa.eu/publications/addressing-data-gaps-evaluate-cap-strategic-plans_en.
63 Article 1(3) of Commission Implementing Regulation (EU) 2022/1475.

Such a comparison is not possible for all impact indicators, as the PMEF also introduced new indicators (e.g. on biodiversity and pesticides). In those cases, the use of result indicators can be explored. The PMEF and CMEF result indicators can be screened and mapped for suitable comparisons, identifying indicators with matching characteristics such as objective, type of intervention and unit of measurement. This provides a basis for comparing (more specific) PMEF result indicators with the more generic result indicators of the CMEF. For example, the PMEF result indicators regarding key element 6 (biodiversity) such as R.31 (share of utilised agricultural area (UAA) under supported commitments supporting biodiversity conservation or restoration including high-nature-value farming practices) and R.34 (share of utilised agriculture area (UAA) under supported commitments for managing landscape features, including hedgerows and trees) are more specific than the related result indicator in the CMEF R.7 (percentage of agricultural land under management contracts supporting biodiversity and/or landscapes). Comparing PMEF and CMEF result indicators needs to account for overlaps among indicators that may count the same parcel of land multiple times.

For mapping ambition in comparison to the previous period, output indicators and indicators of financial allocation across instruments in the current and previous period can support a comparative assessment of result indicators. These indicators provide the outputs and inputs for the interventions concerned with the result indicator, and can provide insights, if more ambitious targets regarding the potential applicants and eligible areas were achieved from the previous to the current period.

A4.2 Recommended methods

A4.2.1 Assessment of effectiveness of GA instruments in relation to SO4, SO5 and/or SO6 (EQ1)

The recommendations for the methods used focus on quantitative and qualitative methods able to assess the impact of the GA in relation to the specific environmental and climate objectives (SO4, SO5 and SO6). Combinations of methods are required to quantify values for the result and impact indicators and to complement these with relevant qualitative findings for answering the evaluation questions.

Ideally, as for any SO evaluation, methods selected for the effectiveness assessment enable the quantification of the net effects of the GA on the appropriate PMEF result and impact indicators (or additional indicators selected). The netting-out of effects can be done at micro (e.g. farm or parcel) and macro (MS or region) levels. At the micro level, netting out relates to the adoption of certain farm practices linked to the GA instruments that affect key elements of environmental and climate objectives. The counterfactual for assessing net effects at the micro-level is based on comparisons between control groups of programme beneficiaries and non-beneficiaries. Multiple control groups can be created to reflect the uptake of different combinations of GA instruments. These control groups can be created through matching methods, ensuring that the groups are sufficiently statistically similar (with similar characteristics), so that any difference in outcomes can be assumed to be an effect due to the GA instruments. However, in certain circumstances (e.g. non-beneficiaries are rare), it is not possible to determine a counterfactual and therefore modelling methods can be applied to simulate a baseline. If the use of specific (simulation) models is not possible, evaluators may use information from research projects, literature reviews and focus groups or interviews with key stakeholders. At the macro level, netting out effects is a policy-on/policy-off comparison, and the counterfactual can be constructed at the start of the programming period or another year without the influence of the GA.

Netting out the effects is complex and depends on the quality and quantity of existing data. It is also important to keep in mind that quantitatively netting out the indicators is just one means of evaluating effectiveness. For example, effectiveness can also be assessed by analysing the coverage and scale of GA activities (farming practices), e.g. for the key element halting and reversing biodiversity loss on agricultural land in relation to well-known, important bird sites in and around special protection areas (SPAs) or in relation to habitat connectivity and networks. Such an assessment would utilise PMEF output indicators (e.g. such as the number of hectares under specific practices or the number of farms participating in relevant eco-schemes or AECMs), require georeferenced data, and be closely linked to the coherence analysis (see also Chapter 4, Annex B4 Phase 2: Selecting indicators, data sources and methods).

Data availability is a key driver for the choice of methods to assess the effectiveness of the GA. Previous guidelines provide detailed recommendations for methods to evaluate the impact of CAP instruments on environmental and climate objectives (e.g. FoS guidance [64], assessing RDP achievements and impacts [65]). Short summaries of the selected types of methods, which are also relevant for a GA evaluation and therefore should be considered in this situation, are provided below and Table 11 sets out their advantages and limitations and provides suggestions on when these might be best used.

Environmental-economic and econometric modelling approaches, e.g. partial equilibrium and spatial econometric models, estimate corresponding model parameters (e.g. to assess impacts of the GA on carbon sequestration) econometrically, accounting for robust causal links, possible selection bias, endogeneity and spatial dependencies. These modelling approaches can be applied at national and regional level to assess the impacts of the GA as a whole or the net effects of different combinations of GA instruments. Limitations of these approaches relate to the resources, time, data and modelling experience required to develop and apply the modelling approaches. Care is also required in the assumptions applied to the GA instruments included in the modelling framework to

64 See footnote 6 for FoS guidelines reference.
65 See footnote 32 for RDP achievements and impacts (2018).

ensure that the causal relationships of such instruments and related land-management changes are theoretically sound. Examples include the CAPRI model [66] and MAGNET model [67]. The approach of these models is based on the effects of policies on land use and livestock changes, for example, simulating the consequent GHG emissions. A recent study models, among others, the environmental and climate impacts of various CAP scenarios, including a scenario without a CAP [68].

The use of advanced statistics-based evaluation approaches, such as PSM and DiD estimation, is recommended to be used in the assessment of the effectiveness of the GA on environmental and climate objectives if there are sufficient data from participating and non-participating parcels/farms, information on the factors explaining participation in the relevant measures, and annual data sets covering the period before and during implementation. Box 2 provides an illustrative example for an assessment of the effectiveness of a bundle of GA instruments combining difference-in-difference analysis with matching techniques [69].

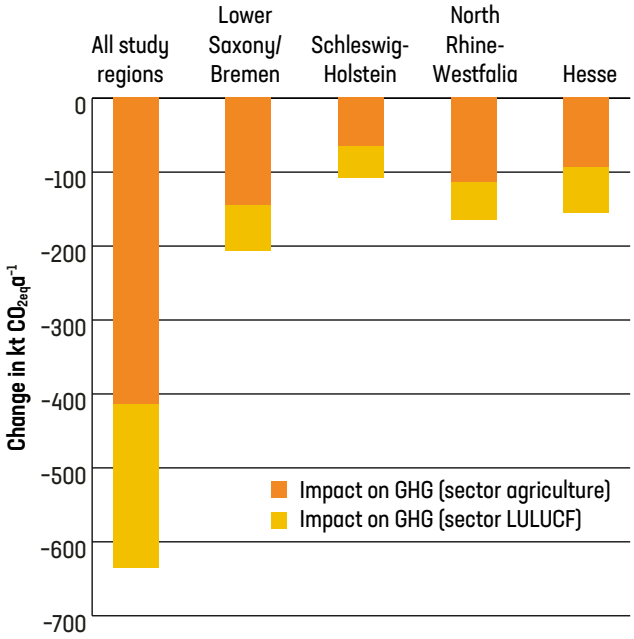
Box 2. Impacts of RD support on the reduction of GHG emissions

The illustrative example presents results of the mid-term evaluation of RD programs 2014–2022 for four regions, Lower Saxony, Hesse, North-Rhine Westphalia and Schleswig-Holstein, in Germany.

Methods and data: The impact of RD support on GHG is estimated according to the CMEF impact indicators 'GHG emissions agricultural sector' (I.07.1a) and 'GHG emissions LULUCF sector' (I.07.1b). The CMEF indicators and methods are compatible with those used in the national GHG inventory. Impacts are estimated for those RD measures and projects for which payments were made between 2015 and 2018. The extent, type and location of supported measures and projects are analysed using various data sources. These include output and result indicators reported in the annual implementation reports, project level data (for investment projects) and IACS data (for area-based support). Nutrient records reporting the nitrogen balance of farms with and without participation in organic farming (M 11) and other agri-environmental and climate measures (AECM, M 10) were used for a counterfactual analysis. Additionally, mitigation costs per tonne of carbon dioxide equivalent are estimated according to the method of Fährmann and Grajewski [69].

Results: Emission reduction has been of little importance in the RD programmes studied: One third of RD expenditure had climate relevant (side) effects, but only 3% of RD expenditure were targeted to climate mitigation. The figure below illustrates that a total of 636 kt carbon dioxide equivalents (CO_2eq) were reduced through RD support. 64% of these emissions (411 kt CO_2eq) stem from the agricultural sector, the remaining part from the LULUCF sector. Compared to set reduction targets, the impact of RD support on GHG is rather small. As shown in Figure 2, the impact equals a reduction of 0.1% of total GHG (all sectors) and of 1.4% of GHG from the sector agriculture. Due to different RD measures adopted, the impact on agricultural GHG varies between -1.0% in Lower Saxony and -3.6% in Hesse.

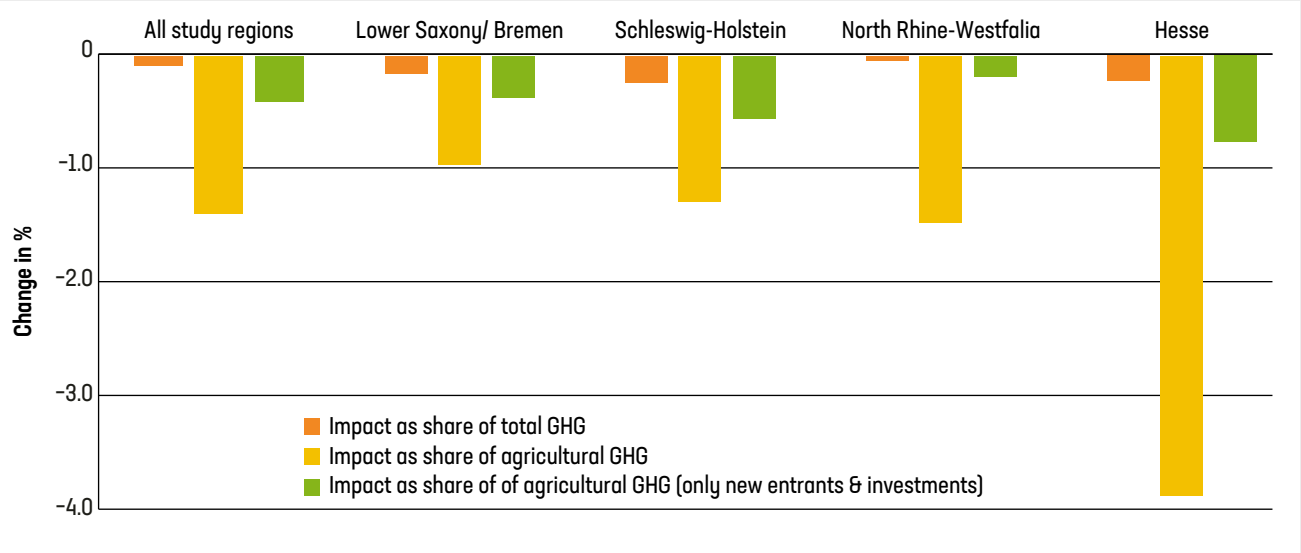
Impact of RD support on the reduction of GHG emissions (2015–2018)



Source: Pufahl A, Roggendorf W (2022) Impacts of rural development programmes in Germany on the reduction of greenhouse gas and ammonia emissions and associated mitigation costs. Conference Paper/ Presentation. European Association of Agricultural Economists (EAAE), 181st EAAE Seminar, October 5-7, 2022, Berlin, Germany https://doi.org/10.22004/ag.econ.327309

66 CAPRI model - Comparative static partial equilibrium model for the agricultural sector developed for policy and market impact assessment.
67 MAGNET model - Neoclassical computable general equilibrium model based on GTAP (Global Trade Analysis Project).
68 Fellmann, T., Tassinari, G., Lasarte Lopez, J., Rey Vicario, D., Beber, C. et al., *Scenar 2040 – A scenario study on the Common Agricultural Policy*, Publications Office of the European Union, Luxembourg, 2025. https://doi.org/10.2760/7381366.
69 Pufahl, A., Schwarze, S., Roggendorf, W., Sander, A., Bathke, M., Bergschmidt, A., *Wirksamkeit und Effizienz der ELER Förderung für Ressourcenschutz*, Klimaschutz und Tierwohl, 2022, https://doi.org/10.12767/buel.v100i1.395.
70 Fahrmann, B., Grajewski, R., *How expensive is the implementation of rural development programmes?*, European Review of Agricultural Economics, 40(4), 2013, pp. 541–572, https://doi.org/10.1093/erae/jbs045.

Effectiveness of RD support with respect to the reduction of GHG emissions (2015-2018)

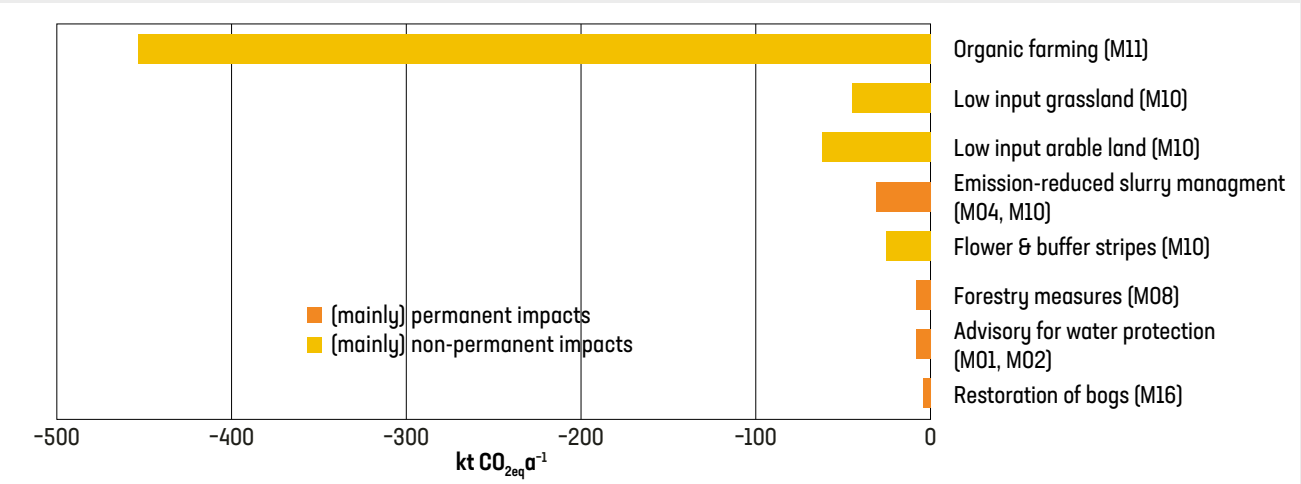


NB. The RD impact on GHG emissions sector LULUCF is not included, since LULUCF emissions per study regions are not available.

Source: Pufahl A., Roggendorf W (2022), Impacts of rural development programmes in Germany on the reduction of greenhouse gas and ammonia emissions and associated mitigation costs, Conference Paper/Presentation; European Association of Agricultural Economists (EAAE), 181st EAAE Seminar, October 5-7, 2022, Berlin, Germany. https://doi.org/10.22004/ag.econ.327309.

The following visual depicts the impact of individual RD measures (averaged over study regions). About 90% of reduced GHG emissions stem from input-reducing measures as organic farming and other AECMs. Relevant impact paths are the renunciation of mineral nitrogen fertilisers, the improvement of nitrogen efficiency, reduced livestock densities and the humus build-up in agricultural soils. These impacts are likely to be offset by displacement effects elsewhere. A further drawback is that the input-reduction is not ensured permanently, but for the five-year commitment period only. Hence, achieved emission reductions could be reversed if support is discontinued. About 8% of all RD impacts on GHG result in a mainly permanent reduction of GHG. These include impacts induced by emission-reduced storage and spreading of manure supported through investments (M04) and AECM (M10), advisory support targeted to water protection (M01, M02), investments into forests (M08) and peatland restoration (M04) measures.

Impact of RD support on GHG emissions (2015-2018) by measure, compared to the situation without RD support



Source: Pufahl A, Roggendorf W (2022) Impacts of rural development programmes in Germany on the reduction of greenhouse gas and ammonia emissions and associated mitigation costs, Conference Paper/Presentation; European Association of Agricultural Economists (EAAE), 181st EAAE Seminar, October 5-7, 2022, Berlin, Germany https://doi.org/10.22004/ag.econ.327309.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Other advanced regression and matching techniques (e.g. regression techniques for average treatment effect on the treated (ATT), instrumental variables matching algorithm) can be used for counterfactual based assessments of beneficiaries and non-beneficiaries of GA instruments. These approaches can also be used to compare different intensities or different combinations of GA support (instruments). Examples of applications of regression-based methods and matching techniques include a study assessing the effects of the crop diversity criterion from CAP green payments (2014-2022 period) on the economic and environmental performances of farms in France using Farm Accountancy Data Network (FADN) data [71] and a study analysing the effects of and a study evaluating the environmental and economic effects of Organic Farming subsidies under the Rural Development Policy 2007-2013 programming period in an Italian region [72]. Box 3 provides an example of the application of the DID method combined with propensity score matching for an ex post evaluation of the crop diversification requirement (related to impact indicator I.22), extracted from the JRC's Evidence Library [73].

Box 3. Example of application of advanced statistics-based evaluation approach: The impact of crop diversification using EU FADN

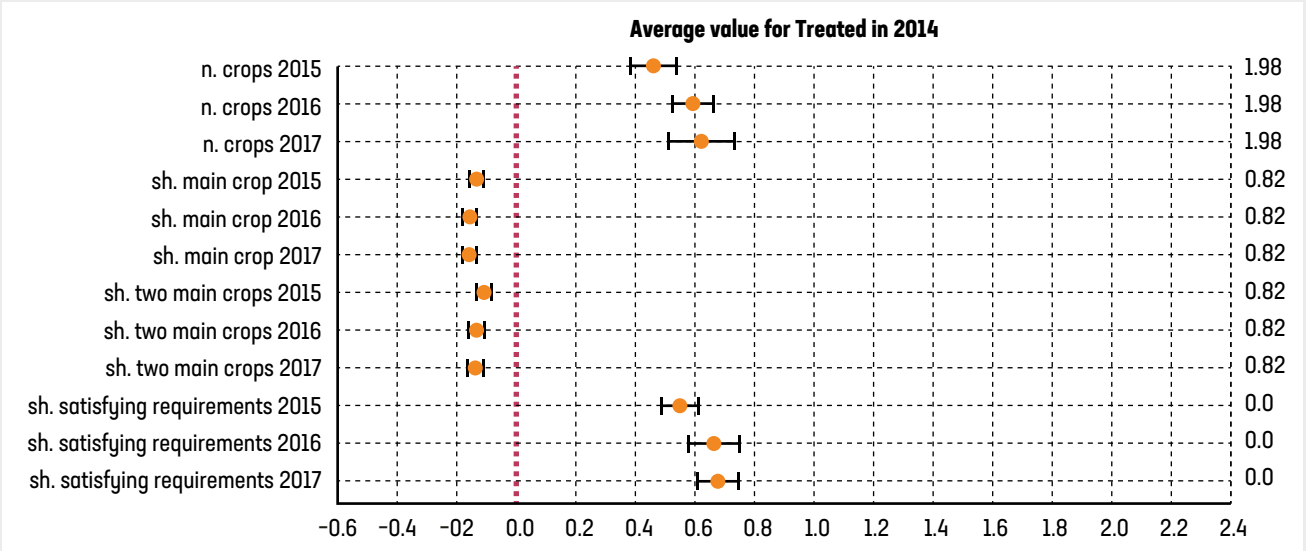
Policy intervention - The greening crop diversification (CD) requirement *

The causal impact of the CD requirement across the EU was evaluated using the difference-in-differences method combined with propensity score matching. This integrated method allowed for an estimation of the policy impact on farms under the scope of the policy intervention by comparing over-time changes in outcomes for treated farms (i.e. those holdings 'pushed' to compliance by the new policy) with a no-policy scenario. This counterfactual scenario was mimicked by a control group of untreated farms that already complied with diversification in 2014. Treated farms differ from untreated ones in several observable aspects, notably being smaller in terms of arable land (AL) and output. Propensity score matching selects a control group of untreated farms that closely resemble treated farms, based on observable characteristics.

The visual shows the quantified average changes in the outcome of treated farms attributable to, i.e. caused by, the introduction of the CD obligation, after 'netting out' other external influences. Estimates suggest a statistically significant impact of the CD requirement on the previously non-adherent farming population. On average, the number of AL crops in non-already-compliant farms grew by 0.62 after three years (in 2017), compared to what would have happened in the absence of the CD regulation. Further, the share of AL dedicated to both the first and the first two main crops significantly decreased by 16.3% and 14.0% respectively, by 2017. Overall, 68% of the farms that were not satisfying CD requirements became compliant within three years after their introduction.

*The greening CD intervention (Art. 44 of Regulation (EU) No 1307/2013) required CAP beneficiaries cultivating above 10 and 30 hectares of AL to grow a minimum number of crops, and to limit the proportion of AL covered by main crops.

Average effect of the CD regulation on selected variables - years 2015, 2016, 2017



NB. Estimates (golden markers) and 95% confidence intervals (blue lines); n=number; sh=share.

Source: European Commission, Joint Research Centre [74]

71 Diop, T. B., Védrine, L., *Did crop diversity criterion from CAP green payments affect both economic and environmental farm performances?*, Ecological Economics, 227, 2025. https://doi.org/10.1016/j.ecolecon.2024.108405.

72 Cisilino, F., Bodini, A., Zanoli, A., *Rural development programs' impact on environment: an ex-post evaluation of organic farming*, Land Use Policy, 85, 2019, pp. 454-462. https://doi.org/10.1016/j.landusepol.2019.04.016.

73 See footnote 18 for the JRC's Evidence Library.

74 Brutti, Z., Freo, M., *Evaluating the CAP Greening crop diversification measure with counterfactual methods*, Publications Office of the European Union, Luxembourg, 2025. https://dx.doi.org/10.2760/6585881.

Recent methodological developments of relevance for the effectiveness assessment of the GA include ways to use the **JRC – Farming Practices Evidence Library**. The JRC farm practices data collection is a comprehensive library on the effects on the environment and the climate of an extensive range of farm practices [75] based on the scientific evidence available in meta-analyses published worldwide [76]. The quantified information on the impact of farm practices synthesised by the JRC aims to provide robust scientific evidence to support the implementation, monitoring and evaluation of the CAP, including GA instruments. This science-based evidence library is an online public database [77]. The library displays a comprehensive collection of quantified information on the impacts of farming practices, for example, on GHG emissions, carbon sequestration and nutrient losses drawn from the academic literature. In particular, in circumstances where there is limited monitoring data available for the impact indicators, these data can be used to assess the potential effects of the GA instruments, e.g. for calculating the potential effects on GHG emissions and carbon sequestration from the farm practices included within conditionality or supported through eco-schemes and ENVCLIM (e.g. conversion to organic farming, cover and catch crops, the use of compost), addressing impact indicators I.10 (greenhouse gas emissions from agriculture), I.11 (soil organic carbon in agricultural land), and I.13 (soil erosion by water).

The impact coefficients can be applied in combination with the farm practice classification and the Catalogue of CAP interventions (see Box 1 and Chapter 2.2.1), which provides labels for many of the CSP interventions with environmental and climate objectives. To date, the approach has been applied in an ex ante context to calculate the potential effects or contributions of the CSPs to particular objectives, such as soil health and climate change mitigation. For that purpose, farm practices are assigned coefficient values representing their estimated potential contribution in terms of environmental effects, such as reducing GHG emissions, enhancing carbon removals, mitigating soil erosion, reducing Nitrogen leaching and runoff, etc., in comparison to a reference conventional farm practice. These coefficients are mainly derived from the evidence library. Then for each intervention and GAEC, the estimated area of (supported) farming practice can be multiplied by the impact coefficient. The results can provide a rough order of magnitude and highlight certain questions in relation to the implementation and effects of bundles of GA instruments for further examination.

The analysis should be viewed as an initial step toward more refined and comprehensive assessments. Future improvements are necessary. In order to move from an assessment of a potential (ex ante) to the actual contribution (ex post) of the CSP, case studies on shifts in practices could be conducted, matching LPIS data with impact coefficients of (supported) farm practices. In addition, it needs to be considered that the impact coefficients are usually generic and not adapted to local contexts. Research is on-going by JRC on how the coefficients could be made more localised. Finally, further challenges arise from the lack of counterfactuals for the assessment of GA interventions due to gaps in data availability.

Box 4. Approach developed for the rough estimate of the potential of CSPs to contribute to climate change mitigation and soil health

The rough estimate studies implemented from 2023 to 2025, establish for the first time a link between CSP instruments (GAECs and CAP interventions) and their mitigation or protection potential, at MS level. The methodology applied in both studies relies on programming data extracted from the CSPs of the 2023-2027 CAP programming period, on rough estimates of expected uptake levels, and on average impact coefficients for farming practices.

For this purpose, farm practices were assigned coefficient values representing their estimated contribution compared to reference conventional practices, with respect to:

- Climate change mitigation: reduction of GHG emissions, enhancement of carbon removals or protection of carbon stocks.
- Soil protection: increase in organic carbon stock, nitrogen stock, and water stock at field capacity, reduction in soil packing density, in nitrogen losses from leaching and runoff and in erosion caused by runoff.

Most of the original coefficients, sourced primarily from the JRC Evidence Library, had to be adapted to fit the metrics chosen for the study. This required applying additional assumptions, using conversion coefficients or baselines. The next step was to associate each intervention and GAEC with the relevant farm practices i.e. 'mapping'. This mapping developed jointly by the Evaluation Helpdesk and the JRC is publicly available via the European Commission's online Catalogue of CAP interventions [77]. Manual adjustments were made to select only those practices relevant for estimating the areas with an expected environmental effect.

75 Angileri, V., Guerrero, I., Weiss, F., A classification scheme based on farming practices, Publications Office of the European Union, Luxembourg, 2024. https://dx.doi.org/10.2760/33560.

76 European Commission, Joint Research Centre, Dataset - JRC collection ID-00399, Publications Office of the European Union, Luxembourg. Available at: https://data.jrc.ec.europa.eu/collection/id-00399.

77 See footnote 18 for the JRC's Evidence Library.

78 European Commission, Directorate-General for Agriculture and Rural Development, 'Catalogue of CAP interventions'. Available at: https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html.

79 European Commission, Directorate-General for Agriculture and Rural Development, 'How to roughly estimate the climate change mitigation potential of a CAP Strategic Plan (CSP)', 2025. Available at: https://eu-cap-network.ec.europa.eu/training/evaluation-learning-portal/how-roughly-estimate-climate-change-mitigation-potential-cap-strategic-plan-csp_en.

The following step required estimating the areas covered by those practices. The estimation of areas covered by each farm practice depends on the design of the intervention or GAEC, and on the information available in the CSPs available at the time of the studies: planned output, planned result indicators and details of the contribution of each intervention to the result indicators within the PMEF. Numerous assumptions were necessary to distribute planned areas across different practices, particularly when farmers can choose among several options, or where the intervention description allows compliance through multiple practices. In future assessments, the use of actual uptake data should improve accuracy.

The methodology is designed to be straightforward to use. It provides a structured framework for estimating the potential contribution of the CAP, both at the level of individual MS and across the EU. MAs and evaluators are encouraged to use the approach as an 'entry point' into more quantitative analyses, which can then be adapted and expanded as needed. To support this process, specific deliverables and learning materials have been developed to facilitate capacity-building and knowledge transfer among MAs. See the learning portal of the Evaluation Helpdesk [78].

Source: European Commission (2024) [80]

In addition, **qualitative approaches** are not only an alternative to quantitative methods when data are missing but can also complement the quantitative counterfactual evaluation. Qualitative assessments can also help to complement the quantitative assessments by assessing the representativeness of the available data, cross-validating findings and capturing different dimensions of the same phenomenon. For example, qualitative theory-based evaluation (TBE) can be used to analyse the intervention logic of the GA identifying causal links and mechanisms of change due to the bundle of GA instruments, leading to results and impacts. The various links in the intervention logic can be analysed using a variety of methods of stakeholder engagement including focus groups and stakeholder/expert interviews. TBE can also be used to show how and why the GA was effective or not. These how and why questions are part of the coherence assessment which is explained in detail in Annex B.

If quantitative results are available for the main indicators (e.g. I.10 (greenhouse gas emissions from agriculture) or I.14 (ammonia emissions from agriculture)), **impact scores** can be developed to compare the change in the values of the main indicators to the targets set to provide an overview of the magnitude of the effectiveness of the GA instruments. These approaches build on multi-attribute theory and can deliver conceptually simple and easy to communicate results about the effectiveness of the GA across the different key elements (environmental attributes). For example, impact scores could be given on a 0–5 scale, or a negative-to-positive scale (either positive, non-significant, negative as done for the farm practices [81], or differentiating between strong and weak positive and negative). In addition, given the likely variability of methods and approaches used to assess the effectiveness of the GA for each key element, a level of confidence could be used to weight impact scores for single key elements to reflect the rigour credibility, robustness and validity of the different methods applied. The definition of the different levels of confidence can build upon methodological assessments and recommendations provided in previous guidance for assessing environmental achievements and impacts. The use of scores requires the definition of thresholds for each of the main indicators used in the effectiveness assessment. **Literature reviews of relevant studies and participatory expert workshops** can be used to define and/or validate the use of scores and their thresholds.

80 European Commission: Directorate-General for Agriculture and Rural Development – Unit A.3, Rough estimates of the climate change mitigation potential of the CAP Strategic Plans (EU-18) over the 2023-2027 period – Summary report for 19 CAP Strategic Plans, Brussels, 2024. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cmef/sustainability/climate-change-mitigation-potential-csp-eu-18-2023-27_en.

81 Ibid.

Table 11. Overview of advantages and disadvantages of selected types of methods for EQ1

Method	Advantages	Disadvantages	When to use
Environmental-economic and econometric modelling approaches	Modelling approaches can include multiple indicators across different key elements; Theoretically sound modelling framework.	Dependence on modelling assumptions; Data, time and resource intensive; Simulation models reflect ex ante perspective.	National and regional level impact simulations; When setting up control groups is not feasible.
Advanced statistics-based evaluation approaches	Well established approaches; Attribution of observed effects to GA instruments; Possible to compare different combinations of GA support.	Data intensive; Larger sample sizes and intermediate econometric skills are required.	Net-impact assessments, if sufficient data for control groups before and during implementation.
Farm practice approach with impact coefficients	Coefficients based on well-documented theoretically-sound linkages between farming practices and environmental outcomes; Wide range of farming practices supported by different GA instruments.	Generalisation of varying impacts of practices, e.g. in relation to farm size, geographic location, spatial variability and specific species.	Enables generic impact assessments of GA instruments, if limited monitoring data are available.
Qualitative approaches	Complementary insights on how and why the impacts have been generated; Participatory stakeholder engagement.	Cannot quantify net-effects and replace robust quantitative methods; Requires specific skills and experience in qualitative environmental assessments.	Alternative to quantitative methods when data gaps persist; Triangulation for validating the findings of quantitative methods.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025) [82]

A4.2.2 Assessment of the effectiveness of GA instruments compared to the previous programming period (EQ2)

Assessing the effectiveness of the GA compared to the previous programming period is meaningful even if the two programming periods use different instruments. The assessment compares overall effects or impacts independent of the various instruments used to achieve them. But the difference in the instruments needs to be considered in the interpretation and contextualisation of the results. For instance, it should be explained whether the impacts compared include those of all CAP instruments or only of instruments targeted to environmental and climate objectives.

If the effectiveness assessment of the GA instruments plans to analyse the extent to which the GA has increased ambition of advancing towards environmental and climate targets compared to the previous programming period (EQ2), methods and approaches are needed to match and compare indicators across the two programming periods. The approach of **matching indicators** refers to linking or relating different indicators (measurements or variables) to one another for analysis, comparison or reporting. The matching of indicators across the two periods is required where indicators have been revised or new indicators have been added in the current programming period (e.g. new result or impact indicators). The matching aims to enable comparison by ensuring that indicators have similar objectives, contexts and units of measurement (see Annex A5.1.2 Assessment of the effectiveness of GA instruments compared to the previous programming period).

82 Article 1(3) of Commission Implementing Regulation (EU) 2022/1475.

A5 Phase 3: Analysis, outcome and recommendations

A5.1 Carrying out the analysis

A5.1.1 Assessment of effectiveness of GA instruments in relation to SO4, SO5 and/or SO6

Once the data and methods have been identified, the following steps are recommended for the assessment of the effectiveness of the GA instruments in relation to each specific environmental and climate objective programmed in the CSP.

Evaluation step 1 – Calculation of the value of the selected indicator(s)

The analysis under a certain FoS might be based on more than one type of evidence, combining an analysis of uptake based on output indicators and data on the financial allocation across GA instruments, followed by an analysis of immediate results based on result indicators, and an assessment of the impacts and (if possible) the net effect of the GA support. Output, result and impact indicators selected in phase 2 need to be calculated for the different GA instruments and key elements of the environmental and climate objectives SO4, SO5, and SO6 identified in phase 1 of the evaluation framework.

Before calculating indicators, assessments of the quantity and quality of data are needed to determine whether their characteristics are appropriate for indicator calculation and the implementation of available impact evaluation methods. Limitations on data quality can often affect the applicability of methods for use in environmental impact assessments, leading to a lack of consistent, robust and representative results. Therefore, it is important to identify potential constraints on the calculation of indicators due to poor data quality (e.g. lack of spatial and thematic representativeness of external environmental monitoring data). This leads to tests on: (i) the scope for increasing the quantity of data (e.g. number of observations) to assure a better representativeness of the results; and (ii) whether data pre-processing may be required. A test is also made of the availability of spatially explicit data, which may be appropriate for assessments of environmental impacts of GA instruments and be a requirement for some indicators.

Data will be collected from available databases at EU, national and regional levels and additional data can be collected through surveys and interviews.

Evaluation step 2 – Estimation of the net effect

This step estimates the net effect of GA instruments on the selected main indicators and the calculations. Ideally, net effects are estimated using the PMEF impact indicators. Even though the quantification of a few of the impact indicators (e.g. I.13, I.17 and I.18, see also Annex A4.1 Proposed indicators and data sources) is not obligatory, it is good practice to try to estimate the net effect of the GA instruments, as this will enhance the credibility of the evaluation and will also be important for the other evaluation criteria, such as efficiency. If the estimation of net effects on the value of impact indicators is not possible, then also the result and output indicators can be used.

A key aspect of the estimation of net effects is the design of counterfactuals. As outlined in Annex A4.2 Recommended methods, matching techniques can be used to construct suitable control groups. Statistical tests on covariates included in the analysis can be used to assess the similarity between the groups prior to implementing the GA. The selection of the method for the estimation of net effects depends on the availability of data and the main types of indicators selected. Noticeable differences exist in experiences of data availability in netting out effects between the different key elements. Detailed guidance on estimating net effects is provided for each of the key elements in the FoS guidance [83].

Evaluation step 3 – Analysis of other indicators that may help set the context or highlight specific aspects

The analysis of additional indicators can improve understanding of the context of the results of the effectiveness assessment and facilitate interpretation of the impacts of GA instruments. For example, farming intensity and the area under organic farming are useful context indicators that can complement the estimation of net effects on crop diversity at the farm or regional level (impact indicator I.22) and support the interpretation of the impact of GA instruments on agrobiodiversity. Additional indicators can also address data gaps for PMEF indicators and enable in-depth analysis of specific sub-elements or themes of a FoS (e.g. butterfly index or bumblebee communities).

Evaluation step 4 – Assessment of the FoS

The assessment of the FoS is presented in a narrative that brings together the quantitative and qualitative evidence and explains the direction of the effect of the GA (positive, negative, mixed or no effect). If national targets (or, where relevant, regional targets) exist for the key elements (e.g. expected contributions of the GA to national targets outlined in Section 3.1.4 of the CSPs), then these can be used to estimate the magnitude of the effect of the GA. Such comparisons require appropriate points of reference, either based on measurements made at or close to the beginning of the programming period or on other relevant starting points. As not all environmental and climate key elements can be linked to EU or national targets, it might not be possible to complete a quantitative assessment of the FoS. But in any case, the assessment can report the progress made towards the targets set in the CSPs for financial allocations, output and result indicators.

83 See footnote 6 for FoS guidelines reference.

The application of these steps in relation to the key elements and GA instruments programmed under each of the objectives SO4, SO5 and SO6 provides insights into the extent to which the GA has contributed to the effectiveness of the CSP in relation to the specific environmental or climate objectives (EQ1, Table 8). A result matrix, in combination with impact scores, can be developed to compare changes in the main indicators against the identified targets and provide an overview of the magnitude of the effectiveness of the GA instruments across the three environmental and climate objectives. Such a matrix can be structured in a similar way to the overall matrix of impacts used in the JRC Evidence Library that links farming practices and PMEF impact indicators, and indicates the effect of each farming practice on each specific issue of SO4, SO5 and SO6. Possible dimensions of such a matrix are shown in Table 12 and can include for each key element the indicators and methods used, the targets defined, the effects of the GA analysed, and the resulting impact score and level of confidence. The impact scores and levels of confidence could theoretically be used to calculate a weighted overall impact score. Participatory expert workshops can be used to define and/or validate the scores and their thresholds.

The result matrix can be used to visualise the impacts across key elements of the environmental and climate SOs and the direction of impacts (positive/negative) across the different key element, which can then be further analysed in the coherence assessment. This matrix can also be expanded to compare the impacts across two programming periods (EQ2, Table 8).

Table 12. Illustrative example of the possible structure of a result matrix

Key element	Main indicator	Method	FoS	Impact	Effectiveness	Impact score (illustrative purpose only)	Level of confidence (illustrative purpose only)
4.1 Greenhouse gas (GHG) emissions	I.10 greenhouse gas emissions from agriculture.	Advanced modelling approach.	GHG emissions in agriculture are decreasing due to the GA instruments deployed.		Effective.	Strong positive (+2).	High.
5.1 Air quality	I.14 improving air quality: ammonia emissions from agriculture.	Qualitative assessment.			Neutral.	No effect (0).	Low.
5.2 Water quality	I.15 Improving water quality: gross nutrient balance on agricultural land.	Farm practice approach.			Ineffective.	Weak negative (-1).	Middle.
6.1 Farmland biodiversity	Increasing farmland bird populations: Farmland Bird Index.	Advanced statistics-based evaluation approach.			Partially effective.	Weak positive (+1).	High.
6.2 Ecosystem services	I.21 Enhancing provision of ecosystem services: share of agri-cultural land covered with landscape features.	Farm practice approach.			Partially effective.	Weak positive (+1).	Middle.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

A5.1.2 Assessment of the effectiveness of GA instruments compared to the previous programming period

The comparison of the effectiveness of GA instruments in relation to the previous period builds on the assessment of the effectiveness carried out to answer EQ1 and utilises the results of the effectiveness assessments carried out for the previous period. This includes an assessment of differences in financial allocations and targets and a comparison of output and result indicators and impacts. The comparison of results and impact indicators will not be directly possible for all indicators, as new indicators were introduced in the PMEF. An important preparatory step for the comparative analysis of the effectiveness is thus in phase 2 (Annex A4.1 Proposed indicators and data sources) the screening and selection of matching indicators suitable for comparison. Subsequent steps include assessing the causal relationships between inputs, outputs and target values; comparing target-setting ambitions with the previous period and the key factors that influenced the targets; and comparing outputs, results and impacts with the previous period.

Evaluation step 1 – Comparison of the causal relationship from inputs and outputs to target values for results

This step builds on the consistency check of inputs, outputs and target values outlined in the guidelines on appraising the quantified target values and milestones [84]. The aim of this step is to compare and assess whether the introduction of the GA has improved the links between outputs and inputs with the target values of the result indicators that can be compared to the previous period. For each selected result indicator (targets), the output indicators, the links to the financial inputs and the assumptions and justifications used are reviewed for both periods.

This step also includes considering GAEC in the setting of targets. Conditionality is not an intervention in the sense of Article 3(c) of the CSP Regulation proposal as specific support is not granted, but areas covered by GAEC have to be reported following the same principles as interventions, and can thus be included in the links between outputs and targets (outputs for the interventions and conditionality concerned with the targets of the result indicator) [85].

The assessment of the linkages between targets and interventions and conditionality requirements can be visualised in overview tables [86]. Such an assessment indicates whether each intervention is clearly linked to one or more result indicators and whether targets set for each relevant result indicator are based on the designed interventions linked to that result indicator and take into account enhanced conditionality requirements, reflecting a pathway to achieve an increased ambition.

Evaluation step 2 – Mapping ambitions in setting the targets for the previous period

Building on the understanding of whether and how the GA has enhanced the causal relationships between inputs, outputs and the defined targets, the aim of this step is to identify whether the ambitions of the MS in advancing the targets towards the environmental and climate objectives were greater than in the previous period.

Identified outputs and inputs can be analysed for the selected GA instruments and compared across the two periods, which provides insights into whether ambitious targets for potential applicants and eligible areas were achieved from the previous to the current period. Such an analysis involves mapping expenditures per hectare and year in relation to the ambition level of the GA instrument (e.g. low, medium, high) as a basis for comparison across the two periods. Due to the different lengths of the programming periods, comparisons need to be made based on annual figures. This can relate to extended spatial coverage or changes in definitions of past instruments, to changes and modifications through more stringent environmental requirements for modified previous instruments, or to introducing an intervention addressing a 'known' issue with a completely innovative procedure.

The advantages of such a mapping approach are that interventions with smaller budget allocations and lower uptake can also be considered and that it enables a comparison across the two periods, in case robust impact assessments do not exist for particular key elements of the SO in the two programming periods. The approach is generally applicable to all interventions implemented in both periods. However, it only enables a qualitative interpretation and changes in the impacts achieved are not captured.

Evaluation step 3 – Comparison of impacts

By utilising impact assessments carried out for the current and previous programming periods, results on impacts and effectiveness can be compared. Different options for expanding the result matrix used for EQ1 can be explored to include columns with the results of the impact and effectiveness assessments from the previous period. An illustrative structure of a modified result matrix is shown in Table 13. Step 3 expands the qualitative comparisons of ambitions and enables an exploration of the extent to which the bundle of instruments used under the GA enhanced the environmental and climate effectiveness of the CSP compared to the previous programming period. Percentages of targets achieved can be calculated in relation to the national targets defined for environmental key elements and related impact indicators (e.g. reduction targets for ammonia emissions, (I.14)). In the case of national targets that go beyond the agricultural sector these targets need to be adapted to account for the share of agriculture (e.g. share of agriculture of ammonia emissions) using data available from statistics and literature. Using the quantified changes in impact indicators, the percentages of the GA's contribution towards achieving these targets can then be calculated [87].

84 European Commission, *Tool 3.3 – Appraisal of quantified target values and milestones*, Brussels, 2019. Available at: https://eu-cap-network.ec.europa.eu/publications/tool-33-appraisal-quantified-target-values-and-milestones_en.

85 Ibid.

86 See Table 1 on page 6 of *Tool 3.3 – Appraisal of quantified target values and milestones*.

87 See footnote 69 for Pufahl et al. (2022).

However, attribution gaps (uncertainties about contributions of specific instruments to the impacts) need to be considered. In addition, differences in the instruments (comparison of impacts of the bundle of GA instruments to a potentially broader bundle of CSP instruments in the previous programming period) need to be considered in the interpretation and contextualisation of the results. This also applies to cases where, in both periods, an effectiveness analysis of SO4, SO5 and/or SO6 was carried out with all CSP instruments since any differences in instruments still need to be considered. Further analysis of the GA's coherence can provide insights into complementarities and synergies between instruments that can address these gaps. In addition, time gaps between the implementation of instruments and the occurrence of effects and impacts need to be considered in the comparative assessment.

Table 13. Result matrix for impact comparison

Key evaluation element	Indicator (2014-22, 2023-27)	Expenditure		Impact		Target	Effectiveness (percentage achieved)	
		2014-22	2023-27	2014-22	2023-27		2014-22	2023-27
4.1 Greenhouse gas (GHG) emissions	I.10 Greenhouse gas emissions from agriculture.							
5.1 Air quality	I.14 Improving air quality: ammonia emissions from agriculture.							
5.2 Water quality	I.15 Improving water quality: gross nutrient balance on agricultural land.							
6.1 Farmland biodiversity	Increasing farmland bird populations: Farmland Bird Index.							
6.2 Ecosystem services	I.21 Enhancing provision of ecosystem services: share of agricultural land covered with landscape features.							

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

A5.2 Examples of types of outcomes and recommendations

The effectiveness assessment helps provide several types of conclusions and recommendations regarding the GA's alignment with the CAP environmental and climate objectives and targets defined in the CSP. Effects and impacts on different key elements can be identified, which, together with the coherence assessment, inform recommendations on the targeting, prioritisation and design of a more effective GA for the future. Insights from the comparative assessment of effectiveness across the two programming periods can inform lessons learnt to further enhance ambitious and realistic targets of the GA in the future.

Typical findings from an evaluation of effectiveness will show the extent to which the bundle of GA instruments has affected environmental and climate elements (as measured by PMEF indicators). However, such an effectiveness analysis of the bundle of GA instruments will not show the individual effect of the different instruments, nor is it possible to (only from the effectiveness evaluation), draw conclusions as to what instruments have had a higher or lower effect, or how the different instruments possibly complement (or compete) with one another in relation to one environmental/climate element. For this, a coherence analysis is needed. When the effectiveness analysis is complemented with an assessment of coherence (and efficiency), then together these assessments may provide findings that enable recommendations to be made on:

- Improved targeting of the financial allocations across the different instruments to enhance the cumulative impacts of the GA.
- Adaptation of the design of GA instruments supporting farming practices that are effective in delivering environmental and climate benefits.
- Identification of contradictory effects across the environmental and climate objectives, allowing the design of GA instruments with potentially negative environmental and climate impacts to be minimised.
- Lessons learned for setting targets can be derived from the comparative assessment over the two programming periods for future revisions to the GA.
- Enhance targeting and prioritisation, and improve the tailoring of interventions to environmental needs and farming systems.
- The composition and requirements of the GA are to be adapted to reflect the environmental and climate ambitions of the CSP.
- Monitoring programmes to be enhanced and made more robust and data collection adapted to enable causal links between interventions and environmental outcomes to be better attributed in the future.

Hence, an effectiveness assessment sets the basis for the GA evaluation, but in order to gain an increased understanding of the reasons lying behind the actual impacts from the different instruments involved, it benefits from being complemented with a coherence and efficiency analysis, as on its own, the recommendations that can be made solely from an effectiveness analysis lack important contextual information. The table below outlines examples of outcomes that may be obtained from an effectiveness analysis, and visualises how this may feed into the coherence and efficiency assessments.

Table 14. Indicative examples moving from effectiveness analysis findings to input for a coherence and efficiency evaluation

Evaluation question	Types of outcomes from the effectiveness assessment	Implications for coherence and efficiency assessments
EQ1: To what extent has the bundle of instruments used under the GA contributed to the effectiveness of the CSP in relation to each of the specific environmental and climate objectives?	Net effects of bundle of GA instruments on main environmental and climate indicators. Contribution of GA towards achieving environmental and climate targets.	Coherence: Contributes to determining the scope and focus of the analysis of synergies and trade-offs, and how these can be traced back to the GA design. Efficiency: Determines the scope and focus of the efficiency analysis, providing the nominator for the cost-effectiveness assessment.
EQ2: To what extent has the bundle of instruments used under the GA contributed to enhancing the environmental and climate effectiveness of the CSP compared to that of the previous programming period?	Mapping of inputs and outputs in relation to ambition levels and comparison of impacts across programming periods.	An ambitious evaluation could also attempt to evaluate coherence and efficiency in comparison to the past. In such a case, the outcome from the effectiveness assessment under EQ2 would inform the scope and focus of the coherence and efficiency analyses, which in turn would then provide context and reasoning for the changes in ambition levels and impacts identified under EQ2.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Annex B – Coherence

This annex provides guidelines in relation to the internal and external coherence of the GA. It allows for an assessment of the interplay between the GA instruments and the rest of the CSP, and between the GA instruments and instruments external to the CSP. The annex presents how to assess these interplays, in particular, to what extent, how and why they enabled progress towards achieving the environmental and climate objectives.

B1 Rationale and scope of coherence guidance

B1.1 Rationale for assessing the coherence of the GA

In the EU Better Regulation Guidelines [88], coherence examines how well different actions or policies complement each other. It includes an assessment of **internal coherence**, how various components of the same policy or programme (e.g. within the CAP) interact and whether they are mutually supportive or contradictory, and **external coherence** – how the policy fits with and contributes to other EU and national policies.

An assessment of the **internal coherence of the GA** in the CSPs aims to understand the extent to which the GA instruments work in combination to achieve the CAP environmental and climate SOs. Internal coherence is also relevant to assess the interplay between the GA instruments and other CSP instruments.

An assessment of the **external coherence of the GA** aims to understand the extent to which the GA instruments contribute to meeting EU, national and sub-national environmental and climate goals, beyond the CAP's own goals. The assessment should help enhance integration with EU environmental and climate legislative instruments and their related planning tools (see Table 2. EU Environmental and climate policies and relevance to the GA and Chapter 2.2.2) and other relevant national or sub-national environmental and climate legislation, policies, strategies, plans or instruments.

The coherence of the 2023-2027 CAP with the EU's overall environmental and climate ambition has been questioned, based on the design of the MS's CSPs [89] [90]. Evidence exists of several implementation issues with the GA [91]. For example, the existence of two separate area-based schemes for environmental and climate purposes (i.e. eco-schemes and ENVCLIM) was challenging for MAs, led to administrative complexities, and has not always led to a clear delineation of the scope and eligibility criteria. Ex ante evaluators [92] also pointed out the lack of coherence of design between those CSP instruments that primarily aimed at targeting SO4, SO5 and SO6 and those primarily aimed at advancing towards other SO, in particular, economic objectives. This may impact the overall contributions from the CSPs in relation to the CAP's environmental and climate objectives. They also questioned the coherence of the design between GA instruments and external instruments.

The coherence guidelines provide a structured approach to analysing the coherence of the design of the GA. The assessment allows lessons to be drawn on future CSP design to improve the overall level of coherence of future implementation in view of achieving greater effectiveness and efficiency in relation to the contribution to the achievement of EU and national environmental and climate objectives.

B1.2 Scope of the guidelines

In light of the overall assessment of the GA, these guidelines on coherence provide input for an integrated assessment on the extent to which the GA instruments are coherent, and therefore to better understand **how and why** the GA has driven or hindered progress towards achieving environmental and climate objectives. Guidelines related to three aspects of coherence are provided on:

- how to assess the interplay between instruments forming the GA in view of progress made towards achieving the environmental and climate objectives;
- how to assess the interplay between instruments forming the GA and the other instruments of the CSP; and
- how to assess how the GA has contributed to achieving the long-term targets and objectives of the EU environmental and climate legislation listed in Annex XIII of Regulation (EU) 2021/2115, as well as other EU, national and sub-national initiatives of interest, such as other EU instruments with environmental and climate objectives under the Green Deal.

88 European Commission, *Better regulation guidelines and toolbox*, 2023. Available at: https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en.

89 European Court of Auditors, *Special report 20/2024: Common Agricultural Policy Plans – Greener, but not matching the EU's ambitions for the climate and the environment*, Luxembourg, 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202405766.

90 Röder, N., Krämer, C., Grajewski, R., Lakner, S., Matthews, A., *What is the environmental potential of the post-2022 Common Agricultural Policy?*, Land Use Policy, 144, 2024, 107219. https://doi.org/10.1016/j.landusepol.2024.107219.

91 EU CAP Network, Thematic Group on the Green Architecture: Designing Green Strategies. Available at: https://eu-cap-network.ec.europa.eu/thematic-group-green-architecture-designing-green-strategies_en.

92 European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Synthesis of ex ante evaluations of CAP post 2020*, Brussels, 2023, https://eu-cap-network.ec.europa.eu/publications/synthesis-ex-ante-evaluations-cap-post-2020_en.

B2 Key aspects of the coherence guidelines

During the assessment of coherence, it is recommended to clearly differentiate between **planned coherence**, i.e. how the CSP should work in theory based on its design and intervention logic; and **coherence in practice**, i.e. how the GA has in fact been implemented with insights from the uptake of the relevant instruments and stakeholder experience.

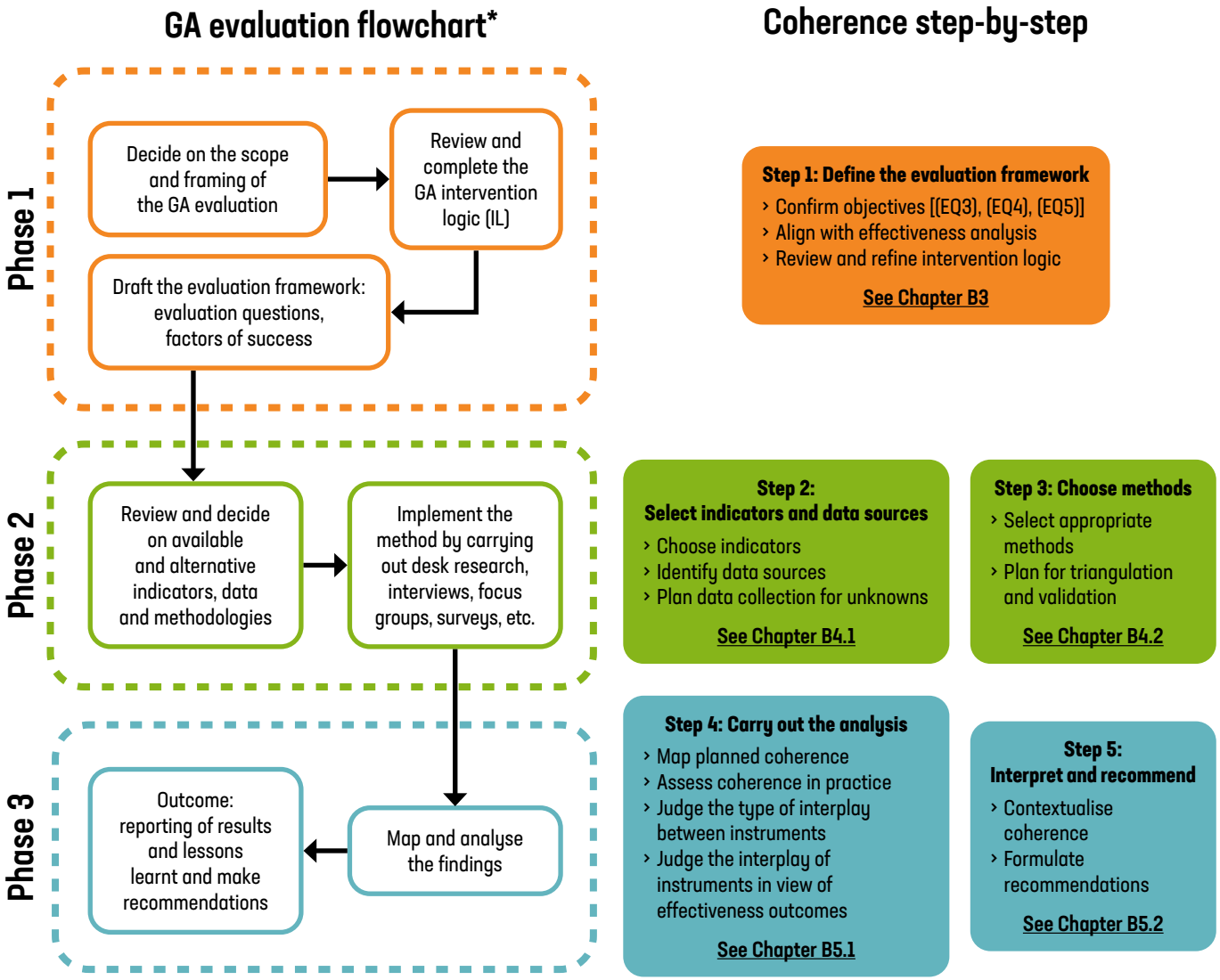
The CSP Regulation allows MS considerable flexibility to combine and design instruments for their CSPs under the CAP's various objectives, resulting in diverse national approaches. Screening the **planned coherence** of the GA can clarify how the design and combination of GA instruments are intended to contribute to the CAP's environmental and climate objectives and interact with other EU, national and sub-national environmental and climate policy goals. It highlights which instruments were designed to work in concert, where potential overlaps, gaps, or contradictions may arise from the design. The screening can be based on an analysis of the CSP documents, including the intervention logic, and insights from the MA on the intentions behind instrument design. Overall, an assessment of planned coherence also helps identify whether interventions are strategically designed to be synergistic with environmental and climate goals. However, it does not reveal whether these synergies materialise on the ground, and its usefulness is limited without supporting evidence from implementation.

Hence, the core of the assessment of coherence should focus on the **GA's coherence in practice, examining how it has functioned**. Such an assessment focuses on the uptake of GA instruments and whether they have worked in synergy or contradiction with other CSP instruments and with environmental and climate legislation and planning tools outside the CSPs. The assessment of coherence in practice is based on empirical insights on synergies and contradictions between different instruments at the farm or landscape level. It relies on an in-depth analysis of quantitative uptake data to capture real-world patterns, such as the number of farms participating in multiple GA interventions or the spatial overlay of interventions, combined with qualitative research into the experience of administrations, farmers, policymakers, environmental non-governmental organisations (NGOs), agricultural advisors, and local authorities in implementing the CSPs. In addition, exchanges with authorities and actors involved in the implementation of environmental planning tools, such as the RBMPs and PAFs, are crucial to understand the strengths and weaknesses of the GA in view of its external coherence with environmental and climate ambitions.

The examination of both planned coherence and coherence in practice enables evaluators to move beyond a narrow focus on intentions or outputs alone and towards a fuller understanding of the coherence of the GA. For instance, theoretical claims about complementarity between interventions must be validated by actual patterns of uptake or geospatial alignment, and payment levels must be interpreted in light of both environmental ambition and stakeholder perceptions. Only through this integrated approach can evaluators meaningfully judge whether the GA operates as a coherent, mutually reinforcing policy framework within and beyond the CSP. The analysis of planned coherence and coherence in practice is embedded in each phase of the coherence assessment, as described in the next chapters.

The guidance on the assessment of the GA coherence follows the three phases of the evaluation flowchart, also applied for the effectiveness and efficiency assessments, as shown in Chapter 3.3. In the visual below, these three phases are translated into more practical steps (a checklist) for the coherence analysis, which will be further described in the following chapters.

Figure 5. Step-by-step process for the assessment of the coherence of the GA



*See the full GA evaluation flowchart in Chapter 3.3

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

B3 Phase 1: Defining the evaluation framework for assessing the coherence of GA

B3.1 Deciding on the framing of the evaluation

The first step is to clearly define the framing of the coherence analysis for the GA (see Figure 3, Chapter 3.3). Crucially, this is about **selecting the environmental and climate elements** (e.g. GHG emissions, nutrient balance, soil erosion, etc.) for which the impact of internal and external coherence will be assessed in view of their impact on achieving related environmental and climate goals.

The individual elements of SO4, SO5 and SO6 that will be covered should ideally match all elements that the effectiveness analysis has assessed (e.g. those assessed in line with EQ1, see Annex A – Effectiveness). The elements selected may be related to all environmental and climate elements set out to be addressed in the CSP or a subset of these elements. For instance, the coherence analysis could focus on at least two elements in the effectiveness analysis to have progressed positively and potentially synergistically (e.g. soil organic carbon is increasing and soil erosion is decreasing). Or it could focus on those that have progressed in contradictory ways (e.g. use and risk of chemical pesticides are decreasing while trends of pollinators are declining). In that way, if one wishes to narrow the scope of the coherence analysis and not assess the coherence in relation to all environmental and climate elements, then the outcome of the effectiveness analysis would provide input for deciding on the scope of the coherence analysis.

Once the elements have been decided upon, the **EQ and FoS** should be defined. A decision should be made on **whether the evaluation will analyse all three dimensions of GA coherence** or focus on the internal coherence of the GA (e.g. proposed EQ4), the coherence of the GA with other instruments of the CSPs (proposed EQ5), or the coherence of the GA with external environmental and climate legislation and planning tools (proposed EQ6).

To define more precisely the relevant interventions and legislation to integrate in the coherence analysis, the **intervention logic** of the CSP should be relied on, or if needed, revised and/or reconstructed (see Chapter 2.1.2). This will also allow the full framing of the coherence analysis to be determined:

- For the assessment of coherence of GA instruments, all instruments considered part of the GA according to the intervention logic of the CSP would be considered.
- For the assessment of the GA coherence with the rest of the CSP, the basis would be CSP interventions programmed to other SO but influencing SO4, SO5 and SO6, regardless of whether these have positive or negative impacts. This may include, for instance, direct income support (e.g. BISS, CRISS, CIS), as well as sectoral support, productive investments, cooperation, and knowledge and innovation when they are not part of the GA. State aid measures may also be relevant given their supplementary role to CAP funding.
- For external coherence, the intervention logic would include EU environmental and climate legislation listed in Annex XIII of the CSP Regulation (see Table 3 in Chapter 2.2.2) and their related planning tools. It could include additional related legislation, policies, strategies, plans or instruments external to the CSP that contribute to achieving EU, national and sub-national environmental and climate goals.

In all cases, the assessment of GA coherence **should consider and include all GA instruments planned** for the selected elements of SO4, SO5 and SO6. This is to ensure that the performance and functioning of the entire GA are evaluated in a holistic way, rather than focusing on particular instruments.

The next section provides more insights into the scope of each evaluation question and the key criteria for evaluating success.

B3.2 Proposed EQs and FoS

Three overarching EQs and corresponding FoS are defined to guide the coherence analysis, based on the definition of internal and external coherence discussed above and building upon the FoS guidelines [93].

Table 15. Evaluation questions and FoS for GA coherence

Evaluation question	Factor of success
EQ3: To what extent and how have instruments forming part of the GA complemented each other and worked in synergy to deliver on the CAP environment and climate objectives? Were there trade-offs and/or overlaps?	GA instruments complemented each other to deliver on the CAP environmental and climate objectives.
EQ4: To what extent and how have GA and non-GA instruments worked in synergy in advancing the CAP environment and climate objectives?	The GA and non-GA instruments in CSP worked in synergy to advance the CAP environmental and climate objectives.
EQ5: To what extent and how has the implementation of the GA contributed to achieve the targets and objectives of environmental and climate legislation and planning tools?	The implementation of the GA contributed to achieve specific targets and objectives of environmental and climate legislation and planning tools.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

EQ3: To what extent and how have instruments forming part of the GA complemented each other and worked in synergy to deliver on environment and climate objectives? Were there trade-offs and/or overlaps?

EQ3 aims to assess the extent to which the GA instruments operated as a coherent and integrated policy mix to deliver on environmental and climate objectives. A positive judgement would rest on evidence that GA instruments built upon one another in a logical progression, for example, from the baseline requirements of conditionality to voluntary eco-schemes and ENVCLIM commitments, creating incentives for higher environmental and climate ambition. Complementarity would be demonstrated when voluntary instruments added value to the baseline, for instance, by supporting specific practices beyond regulatory minimums, with payment structures that rewarded greater ambition. Furthermore, if they are part of the GA, the effective use of investment support and horizontal tools, such as training, cooperation, and innovation, would be viewed as positive when reinforcing the uptake and effectiveness of area-based payments by enabling farmers to adopt more sustainable practices. Spatial complementarity would be positive when GA instruments are most effective in targeting the geographic areas with the highest environmental needs. Temporal complementarity would be positive when multiannual and annual commitments work in tandem. Importantly, no mixed outcomes or overlaps should be evident; for example, support schemes like ANC and ASD should not undermine the outcomes of eco-schemes or ENVCLIM, but rather enhance them.

93 See footnote 6 for FoS guidelines reference.

EQ4: To what extent and how have GA and non-GA instruments worked in synergy in advancing the CAP environment and climate objectives?

EQ4 seeks to determine whether the broader mix of interventions in the CSP functioned cohesively or if tensions and conflicts emerged between its components. A positive judgement would be based on evidence that GA instruments and non-GA instruments (i.e. income support schemes, investments, sectoral, cooperation, knowledge and innovation interventions not programmed towards the environmental and climate SO) worked synergistically to deliver the CSP environmental and climate goals. For example, if income support instruments were designed or targeted in ways that aligned with GA priorities, such as by maintaining extensive or environmentally beneficial farming systems, they could be considered complementary. Similarly, if non-GA investment support reinforced transitions to sustainable practices or technologies, it would be seen as supporting coherence. Sectoral interventions that were coordinated with GA measures, for instance, by targeting the same crops, farming systems, or regions identified as environmental priorities, would further enhance complementarity. Overall, this evaluation hinges on identifying whether the non-GA instruments were used strategically to reinforce the environmental ambition of the CSP or if, conversely, they introduced conflicting incentives or diluted the impact of GA measures.

EQ5: To what extent and how has the implementation of the GA contributed to achieving the targets and objectives that derive from environmental and climate legislation and planning tools?

EQ5 aims to assess the external coherence of the GA with environmental and climate instruments external to the CSP, in particular in view of contributing to achieving the long-term targets of environmental and climate legislation listed under Annex XIII of the CSP regulations and their related planning tools (see Chapter 2.2 for a more comprehensive list), but also other environmental and climate legislation and planning tools at EU, national and sub-national levels. A positive judgement would be based on evidence that GA interventions aligned with the objectives, geographic priorities, and required changes in farming practices as outlined in environmental and climate legislation and planning tools. This includes whether GA measures addressed the key environmental pressures arising from agricultural activities (e.g. nutrient pollution, biodiversity loss, carbon emissions) and are targeted towards the protection and restoration of EU protected species and habitats and relevant high-priority areas (e.g. Natura 2000 sites, nitrate vulnerable zones, or water bodies and catchments in poor ecological status). Consistency also depends on whether the ambition level of GA-supported practices was sufficient to meet the specific changes called for in these plans, such as reductions in inputs, habitat restoration or climate-smart agriculture.

B4 Phase 2: Selecting indicators, data sources and methods

Unlike evaluations of effectiveness, there are no ready-made indicators measuring coherence in the CAP monitoring framework. Instead, the evaluation of coherence requires attention to various types of quantitative and qualitative data that allow for judging levels of coherence. Chapter B4 discusses the identification and selection of relevant data and methods for assessing the coherence of the GA.

B4.1 Proposed data and data sources

Table 16 below presents examples of data that can be used to characterise and assess internal and external GA coherence. By data, we refer to observed or measured information describing the level of GA internal and external coherence. Types of data are presented according to planned coherence and coherence in practice, as described below.

B4.1.1 Planned coherence

Data relating to planned coherence, i.e. embedded in theory in the design of the GA instruments, may include those relating to:

- The scope of the instrument, including its objectives, eligibility requirements, selection criteria, supported solutions and farming practices.
- The planned interaction with other CSP instruments, such as shared objectives, consistent eligibility rules, logical sequencing, common geographical and thematic targeting, and complementary budgetary allocations.
- The planned interaction with relevant environmental and climate planning tools, such as shared objectives and goals, overlapping geographical targets, common measures and actions.

The key sources of data include CSP documentation [94], the PMEF and the Commission's catalogue of farm practices [95]. Studies carried out during the preparation of the CSP are also relevant, such as the ex ante assessment and the SEA of the CSPs. Regarding external planned coherence, a deep dive into environmental and climate planning tools (e.g. RBMP, PAF, nitrate action plans, pesticide action plan, NECP) would be necessary to compare environmental priorities, farm practices and funding needed to achieve environmental and climate goals with what was adopted in the CSP and implemented. Box 5 presents the type of information available in the PAFs prepared under the Habitats Directive, which serves as an example of the background research that could also be carried out in relation to other environmental and climate planning tools.

Box 5. Information available in the Prioritised Action Frameworks under the Habitats Directive

The EU Biodiversity Strategy for 2030 recognises that tackling biodiversity loss and restoring ecosystems will require significant public and private investments at national and European level. The strategy underlines that to meet its objectives, including investment priorities for Natura 2000 and green infrastructure, at least EUR 20 billion a year should be unlocked for spending on nature. It also emphasises that relevant EU programmes and financing instruments must all contribute to this objective.

While the main responsibility for financing Natura 2000 lies with the MS, Article 8 of the Habitats Directive places a legal commitment on the EU to co-finance necessary conservation measures for Natura 2000. To facilitate this, MS adopt strategic multiannual planning tools – known as PAFs – which aim to provide a comprehensive overview of the measures needed to implement the EU-wide Natura 2000 network and its associated green infrastructure, with a view to their incorporation in each of the relevant EU funding instruments under the Multiannual Financial Framework.

The measures are grouped according to eight main ecosystems (several of which are directly relevant to the CAP, such as grasslands and other agro-ecosystems) and, for each measure, the estimated costs, target area (or quantity), the possible EU co-funding source and whether it is a recurring management measure or a one-off investment cost (e.g. for restoration), which are specified in order to facilitate their incorporation into the relevant EU funds. Species-specific conservation measures are also reported in a separate section (e.g. for farmland birds and other species, or large carnivores).

Source: European Commission, Prioritised Action Frameworks [96]

B4.1.2 Coherence in practice

Several types of data can be used to characterise coherence in practice, i.e. how coherent was the implementation of GA instruments during the programming period.

- Within the PMEF, **result and output indicators** offer a tangible measure of implementation uptake. Where Farm Sustainability Data Network (FSDN) [97] data are already collected, additional data on environmental and climate performance may be available at farm level. LPIS/IACS geospatial data can be used for spatially explicit analysis. PMEF indicators were not designed to directly measure GA coherence. Hence, many of the proposed indicators are proxies from which coherence must be inferred. For instance, indicators Table 14 Proposed indicators and data sources for coherence like the 'number of farms participating simultaneously in several GA instruments' are designed to reveal complementarities in targeting and participation.
- **Farm characteristics** can be used to examine the link between the uptake of GA and non-GA interventions. FADN and FSDN microdata offer a valuable source in this regard, providing detailed quantitative data on input intensity (fertilisers, pesticides, water, etc.), economic specialisation and farm system typology.
- **Data on actual expenditure** provides a concrete sense of the relative weight of different instruments within the overall CSP delivery system.
- **Stakeholder feedback**, such as from farmers, PAs and other local and national actors, can shed light on how easily different interventions were taken up, and whether design, administrative and governance factors enabled or hindered coherence.

94 Relevant sections of the CSPs include: the intervention logic of the environmental and climate SO (Chapter 2 of the CSPs), the environmental and climate architecture (Chapter 3.1 of the CSPs), of conditionality (Chapter 3.10 of the CSPs) and other elements common to several interventions such as definition and minimum requirements (Chapter 4.1 of the CSPs), the description of interventions (Chapter 5 of the CSPs) and contribution to green deal targets (Other Annexes of the CSPs).

95 European Commission, Directorate-General for Agriculture and Rural Development, Catalogue of CAP interventions. Available at: https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html.

96 European Commission, Prioritised Action Frameworks. Available at: https://environment.ec.europa.eu/topics/nature-and-biodiversity/natura-2000/financing-natura-2000_en#prioritised-action-frameworks.

97 The FSDN is set to replace the FADN, expanding its scope to cover not only farms' income and business activities but also information on their environmental and social sustainability performance.

In addition, **other CSP evaluations** may be a useful source of information. For instance, the assessment of internal CSP coherence between GA and non-GA instrument requires insights into the effects of non-GA instruments on GA implementation and the achievement of environmental and climate goals. The assessment of GA effectiveness (Annex A – Effectiveness) focuses on the effect of GA instruments. Hence, evaluators would need to use CAP evaluations relating to SO1, SO2 and SO3 to extract any information on the achievement of environmental and climate objectives.

Regarding external coherence, evaluations of the implementation of environmental planning tools and listing of infringement cases can shed light on the level of coherence of CSP implementation with EU environmental regulations (e.g. implementation of measures in environmental sensitive areas such as NVZs). In addition, **feedback from authorities and actors involved in implementing the environmental planning tools is valuable** for understanding the strengths and weaknesses of current CSP implementation in light of the needs arising from these tools.

Further insights in how to collect the above data are presented in the next section.

Table 16. Proposed data and data sources for coherence

Data	Data source(s)	Observations/comments	Planned coherence or coherence in practice
GA INTERNAL COHERENCE			
Stated objectives and scope of GA instruments.	CSP document.	This examines the stated contribution of one or several instruments (e.g. definitions, GAECs, interventions) to one or more environmental and climate elements (e.g. water quality, soil erosion, GHG emissions). It can be based on the stated linkages between instruments and specific SO or result indicators, or on a qualitative analysis of the description of the instrument in the CSP.	Planned.
Eligibility criteria and requirements in GA instruments.	CSP document.	This examines whether eligibility criteria and requirements in the design of interventions foresee: i) mutual reinforcement between specific instruments (e.g. definitions, GAECs and interventions; and ii) the combined uptake of at least two CSP interventions, for instance, when an ENVCLIM requires participation in a specific eco-scheme.	Planned.
GA instruments supporting the same farm practices.	Catalogue of CAP interventions or PA data.	This involves collecting information on the farm practices that are incentivised by different instruments. The Catalogue of CAP interventions can be used to map interventions (eco-schemes, ENVCLIM, investments) supporting the same farm practices. For an overview of what was funded, PA data would be needed, for instance, through an analysis of applications.	Planned vs. In practice.
Overlay of implemented GA instruments.	PMEF. LPIS/IACS. DIB.	This monitors the degree of simultaneous participation of an individual beneficiary [98] or area of land in several GA instruments. For instance, whether a beneficiary or an area of land receives simultaneously eco-scheme, ENVCLIM and/or investment support. This can be made spatially explicit for the overlay of area-based payments. Output data for relevant instruments can be used to quantify the area receiving support from multiple instruments.	In practice.
Financial allocation and expenditure per type of instrument.	PMEF.	This involves collecting data on financial allocation (planned) and actual expenditure for different GA instruments to compare their significance and importance in the overall GA modus operandi.	Planned vs. In practice.

98 More details can be found in Commission Implementing Regulation (EU) 2022/1475 in Annex IV rules on disaggregated data on interventions and eneficiaries referred to in Articles 9(3) and 10(3).

Data	Data source(s)	Observations/comments	Planned coherence or coherence in practice
Enabling factors and barriers for uptake of (combination of) GA instruments.	Interviews/ focus groups/ Farmer surveys.	This involves collecting feedback from farmers, extension services, MA, paying and control agencies on their experience in applying and/or implementing GA instruments. Information may be collected on their perceptions towards the complementarity of different instruments, administrative procedures, payment rates, etc.	In practice.
Synergy with knowledge transfer and cooperation.	Interviews/ focus groups/ Farmer surveys.	Stakeholder feedback on how KNOW and/or COOP interventions enhance the uptake or effectiveness of other GA tools, such as eco-schemes, ENVCLIM or green investments.	In practice.
GA AND NON-GA COHERENCE			
Stated objectives and scope of non GA instruments.	CSP document.	This examines the design of non-GA instruments design to assess whether the goal of the instruments is to contribute also to environmental and climate objectives. It can be based on the stated linkages between instruments and specific SO or Result Indicators, or on a qualitative analysis of the description of the instrument in the CSP.	Planned.
Overlay of implemented GA and non-GA instruments.	IACS.	This monitors the degree of simultaneous participation of an individual beneficiary or area of land in GA and non-GA instruments. For instance, it could be examined if the same areas receive ENVCLIM support to address GHG emissions from livestock while receiving CIS and ANC support. Quantitatively, this could be measured as the share of beneficiaries or area of land receiving specific GA and non-GA payments. Further qualitative examination could assess whether these incentives work synergistically or in contradiction.	In practice.
Financial allocation and expenditure by instrument type.	PMEF/annual performance report (APR).	This involves examining the allocation of resources and expenditures across GA and non-GA instruments. For instance, the share of CSP budget allocated to GA versus income support (Pillar I direct payments) can reveal whether income support overshadows environmental targets, potentially undermining GA objectives.	Planned vs. In practice.
Enabling factors and barriers for uptake of (combination of) GA instruments arising from non-GA instruments.	Interviews/ focus groups/ farmer survey.	This involves collecting feedback from farmers, extension services, MA, paying and control agencies on the perceived level of coherence between GA and non-GA instruments.	In practice.
EXTERNAL COHERENCE			
Prioritised environmental challenges and agricultural pressures in CSP compared to those identified in environmental planning tools.	CSP document, environmental planning tools.	This requires an analysis of the environmental priorities set in CSPs and their level of coherence with the identified agricultural pressures and priorities identified in environmental planning tools (e.g. RBMP, PAF, nitrate action plans, pesticide action plans, NECP).	Planned.

Data	Data source(s)	Observations/comments	Planned coherence or coherence in practice
Farm practices supported by GA instruments compared to those prioritised in environmental planning tools.	Farm practices catalogue, PA data, environmental planning tools.	This compares farm practices supported by GA instruments with those prioritised in environmental planning tools to address agricultural pressures (RBMP, PAFs, nitrate action plans, pesticide action plans, NECP).	Planned. In practice.
Geographical selection criteria in intervention description.	CSP document.	This analyses intervention design to determine whether applicants were required to be situated in areas prioritised by environmental planning tools (e.g. NVZs, drinking water protected areas, flood zones, etc.).	Planned.
Comparison of financial allocation and actual expenditure for GA interventions compared to funding needs identified in the environmental planning tools.	PMEF, PA data, environmental planning tools.	This compares financial allocation and actual expenditure related to the GA interventions addressing a specific environmental challenge with the funding needs identified in the environmental planning tool, such as the PAF and RBMP.	Planned vs. In practice.
Overlay of implemented instruments and farm practices with areas prioritised under environmental planning tools.	LPIS/IACS, spatial environmental plans.	This monitors the spatial overlay of measures supported by GA interventions with areas where changes in farm practices are needed to reduce agricultural pressures, as identified by environmental and climate planning tools, for instance drinking water protected areas, NVZs, prioritised species and habitats.	In practice.
Stakeholder perception of CSP alignment with other policies.	Interviews/ focus groups with stakeholders.	Feedback from e.g. water authorities, biodiversity and Natura 2000 personnel, energy and climate action plan stakeholders, on how GA interventions align with the objectives of the environmental and climate policies and planning tools.	In practice.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

B4.2 Recommended methods

This section outlines methods to be used to respond to EQ3, EQ4 and EQ5. The approach is divided into: (i) uptake and financial analysis, (ii) spatial overlay analysis (iii) stakeholder consultation, and (iv) bibliographic and case study analysis.

B4.2.1 Bibliographic analysis

Bibliographic methods include reviews of CAP planning documents (e.g. CSPs, SEAs, etc.) and other evaluations and policy documents. The systematic review of CAP planning documents is a key step in analysing planned coherence. The review can result in: i) an updated overall GA intervention logic made specific for the evaluation, ii) graphic representations of interlinkages between GA instruments foreseen to contribute to specific environmental and climate elements; and iii) 'bundles' of instruments showing the intended interlinkages between instruments as per eligibility criteria and requirements. Similar analysis can be carried out to show the planned coherence between GA and non-GA instruments as per the CSP. As presented in Annex A on the assessment of effectiveness (see Section A4.2.1 Assessment of effectiveness of GA instruments in relation to SO4, SO5 and/or SO6 (EQ1)), theory-based evaluation can be used to structure the analysis of the CSP and link the design of instruments with their intended impact.

Bibliographic methods can also be useful to collect data on related but relevant aspects of the coherence assessment, for instance, to collect evidence on the impact of non-GA instruments on environmental and climate objectives (see Annex B4.1 Proposed data and data sources). A review of the published academic and grey literature can also be used to triangulate results from other methods presented below, hence helping to validate conclusions in the study area.

B4.2.2 Uptake and financial analysis

Uptake analysis focuses on how widely GA instruments, such as GAEC, eco-schemes and ENVCLIM, are adopted. An analysis can be made of the area concerned and the number of farms subject to the requirement of different GAECs and interventions, the impact of derogations and exemptions applied by the MS as well as the impact of changes and amendments to the CSPs during implementation.

Evaluators can compare planned versus actual outcome through the use of result and output indicators, for example, using the share of the UAA enrolled in eco-schemes (from indicator O.8), the number of participating farms in AECMs (from indicator O.14) or the number of hectares under biodiversity-related commitments (indicator R.14). By comparing data from planned versus actual result or output indicators, evaluators can identify discrepancies that signal implementation challenges or weak policy uptake. Uptake can be examined at national scale, or for different regions or sub-regions where relevant, for instance, when implementation of the CSP is regionalised. It could also focus on environmental hotspots.

Tracking outputs across instruments allows for comparison of the respective contributions of different instruments to shared objectives, revealing whether the burden of environmental delivery is shared or falls disproportionately on certain instruments. Patterns of single vs. combined instruments uptake are particularly relevant for analysing the integration of instruments in practice. Evaluators can, for instance, calculate the percentage of farms enrolled in several GA instruments.

Financial analysis can add another layer to the coherence analysis. This includes examining whether sufficient funding was allocated and spent on GA interventions relative to other interventions, and whether budgetary decisions reflect stated policy priorities. Key indicators include the share of the CSP budget dedicated to GA interventions, the execution rate of eco-scheme funds, and comparisons of GA and non-GA spending contributing to environmental outcomes. Uneven execution rates or underfunding of key measures may reveal either a lack of commitment or barriers in implementation, both of which undermine policy coherence. These calculations typically use data from financial annexes of CSPs, annual implementation reports, and budget monitoring tools.

Evaluators can investigate whether funds were evenly absorbed across regions or if financial bottlenecks affected coherence in implementation. To assess whether sufficient funding has been allocated to and spent on different interventions, evaluators can compare CSP financial allocation and expenditure data with funding needs outlined in external environmental and climate planning tools.

Assessments based on uptake and financial indicators offer several advantages. They provide a tangible measure of the scale of implementation on the ground and provide measurable, comparable data across spatial and temporal situations. Indicators can be compared across different regions of the MS or across different periods, and enable tracking of long-term coherence trends. Such quantitative indicators, however, do not provide information on what has actually been delivered in terms of farm practices and actual outcomes. Uptake indicators would need to be complemented with more detailed information on the nature of the uptake, for instance, by examining data from the relevant organisation (e.g. MAs, PAs) to map the supported farm practices.

B4.2.3 Spatial overlay analysis

Spatially explicit analyses are especially valuable for assessing external coherence, for instance, to check whether GA instruments are implemented in geographic priority areas defined in environmental and climate planning tools. Geographic information system (GIS) tools (e.g. QGIS or ArcGIS) are typically used for these calculations, drawing on LPIS data, intervention maps and environmental datasets.

Examples of spatially explicit analysis could include:

- GAEC 2 (protection of wetland and peatland) and GA interventions (e.g. eco-schemes, ENVCLIM, INVEST) targeted at wetlands and peatlands in areas with freshwater habitats and species, and groundwater dependent species, in poor conservation status under the Habitats Directive.
- GAEC 4 (buffer strips) and GA interventions (e.g. eco-schemes, ENVCLIM) promoting reduced fertiliser use in NVZs or in drinking water protected areas.
- GAEC 8 (non-productive features) and GA interventions (e.g. eco-schemes, ENVCLIM) targeted at particular habitats and species that overlap with relevant Natura 2000 sites.

Evaluators can examine whether CSP implementation occurs in environmental and climate hotspots and aligns with broader EU and national environmental strategies. Misalignments between where GA instruments are targeted and taken up and where environmental pressures are most acute may suggest a lack of external coherence or missed opportunities. Significant shortfalls in implementation in environmental priority areas may suggest issues of technical feasibility, attractiveness, or administrative feasibility issues, which can be investigated through qualitative methods (see Annex B4.2.2 Uptake and financial analysis). Spatial overlay analysis can be complemented by targeted collection of financial data to quantify expenditures carried out in environmental priority areas.

B4.2.4 Stakeholder consultations and qualitative analysis

Qualitative analysis crucially complements quantitative analysis by capturing context and explaining numerical patterns. Qualitative indicators presented in Annex B4.1 Proposed data and data sources involve collecting data on the perceived coherence and practical application of GA interventions. Several techniques can be used to collect such data, like interviews, surveys, focus groups and expert workshops. These techniques are beneficial for obtaining complex, situation-specific viewpoints that quantitative methods might miss. They use firsthand knowledge of people directly involved in or impacted by GA implementation to help identify synergies, conflicts, and unexpected consequences across the three coherence dimensions. Various types of qualitative methods are presented below.

Interviews with individual stakeholders provide a rich set of qualitative data on views, attitudes and lived experiences. It allows for the capture of personal stories and the uncovering of the complexity of individual viewpoints and decisions. When assessing coherence, interviews can be helpful to capture:

- **Individual farmers' experience** with applying to (combinations of) GA interventions, the perceived synergies, overlap or conflicts between incentives from different GA instruments. Farmers may point out, for example, that the administrative requirements for applications to eco-schemes and ENVCLIM are comparable, resulting in synergies by cutting down on paperwork.
- The administrative burden experienced by **agricultural advisors** in applying to different GA interventions or exploring practical synergies, such as how KNOW interventions (training on sustainable practices) can boost the adoption of eco-schemes.
- The experiences of **rural cooperatives** to assess how GA cooperation (COOP) interventions align with non-GA RDP measures (e.g. support for young farmers). Respondents might, for example, report that COOP projects for sustainable supply chains enhance young farmers' adoption of green practices, but administrative silos between GA and non-GA measures create barriers.
- The views of **authorities** such as CAP PAs and environmental agencies may shed light on administrative factors influencing the uptake of single or a combination of instruments. In addition, authorities involved in the implementation of environmental planning tools can help understand the strengths and weaknesses of current CSP implementation in view of environmental and climate ambitions.
- Perspectives of **non-agricultural stakeholders**, such as local municipalities, managers of protected sites, water managers, and environmental NGOs, to evaluate how the GA aligns with environmental and climate policies. They can help find out how ENVCLIM commitments fit with drinking water protected zones or Natura 2000 management plans, and identify shortcomings, such as the lack of GA support for farm practices to protect such areas. They might also draw attention to inconsistencies, like the fact that NVZ land-use regulations limit GA payments for wetland restoration, which would limit the benefits to the environment.

While interviews are very valuable and should be part of any method toolkit to assess GA coherence, they can be time-consuming and costly, and data interpretation can be challenging due to subjectivity and bias. This can limit generalisations if interviews do not follow a careful sampling strategy. In contrast, **surveys** can help collect similar data from a larger number of respondents, while being less expensive or time consuming. However, they provide less rich data and care must be taken to avoid bias when designing survey questions. Combining surveys and targeted interviews can be beneficial to enhance the depth and reliability of the data. Approaches such as the Delphi method [99] can provide a structured way to build information and reach a shared assessment of the performance of the GA.

Focus groups and larger **workshops** can be useful methods to collect diverse perspectives and stimulate conversations as participants build on each other's thoughts. Compared to interviews, these methods can be more cost-effective by simultaneously gathering qualitative data from multiple participants. Participants in workshops and focus groups can be selected to maximise insights from different perspectives on the coherence between e.g. GA instruments and between GA and non-GA instruments. For instance, participants might highlight synergies, such as income support providing financial stability that encourages farmers to adopt eco-schemes. However, they could also identify conflicts, such as farmers prioritising income support over GA interventions due to higher payments, thereby undermining environmental goals.

It is important to have trained moderators for group activities in workshops and focus groups in order to limit biases from dominant voices, ensure all participants have the opportunity and ability to express their opinions, and address potential conflicts between participants. It is useful to **combine workshops and focus groups with interviews and surveys** to collect additional insights that may be apparent only at an individual level. This may be particularly relevant when understanding barriers and challenges because participants may not want to discuss in a group setting due to fear of conflict (e.g. a farmer describing administrative burden when applying to an ENVCLIM).

In addition to incorporating a variety of viewpoints and identifying context-specific issues that quantitative methods might overlook, qualitative methods have the advantage of capturing real-world implementation challenges. They work especially well for assessments conducted early on or in situations where data are limited. Nevertheless, drawbacks include possible bias (e.g. subjectivity in interpreting responses, the resource-intensive nature of consultation planning, and stakeholders putting their interests first). Evaluators can employ structured techniques (e.g. standardised surveys, Delphi, etc.) and triangulation to make sure qualitative methods are reliable.

B4.2.5 Case study analysis

A case study analysis involves an in-depth examination of a CSP SO or thematic areas to assess the coherence of GA interventions. This method provides detailed, context-specific insights into how GA tools interact internally, with other CSP interventions, and with external instruments, making it particularly valuable for identifying best practices, uncovering implementation challenges, and understanding the practical implications of policy design. Case studies can be comparative (e.g. analysing multiple regions of a MS) or thematic (e.g. focusing on a specific GA tool or external policy). Case studies often combine qualitative data (e.g. stakeholder interviews) and quantitative data (e.g. CAP indicators) to offer a comprehensive view of coherence.

99 The Delphi method is a process used to arrive at a group opinion or decision by surveying a panel of experts. Participants respond to several rounds of questionnaires; anonymous responses are aggregated and shared with the group after each round.

B4.2.6 Overview of methods

Table 17 below provides an overview of the methods discussed in the previous sections.

Table 17. Overview of advantages and disadvantages of selected types of methods for coherence analysis

Specific method	Advantages	Disadvantages	When to use
Bibliographic analysis	› Helps cover related and relevant, but not central assessment topics. › Does not require additional data collection. › Useful for contextualising results.	› Quality and relevance of sources may vary. › Risk of outdated or non-comparable results.	› When gathering information on the CSP or from evaluations not part of the GA evaluation (e.g. impact of non-GA instruments). › To triangulate results and validate outcomes.
Uptake analysis (e.g. area under eco-schemes, participation in ENVCLIM)	› Quantifies scale and distribution of intervention uptake. › Enables comparisons across instruments, regions and time. › Enable the correction of uptake rates to avoid double counting. › Uses administrative sources like PMEF or IACS Indicators.	› Does not capture actual environmental delivery. › May mask heterogeneity in implementation quality. › Depends on data consistency.	› To assess how widely GA tools are used. › When administrative monitoring data is available. › To detect burden-sharing and integration across GA instruments.
Financial analysis (e.g. share of budget, execution rates, fund targeting)	› Provides insights on resource allocation and spending efficiency. › Useful for tracking commitment and policy prioritisation. › Uses CSP annexes, financial reports.	› May not indicate effectiveness of spending. › Does not show implementation barriers or delivery mechanisms.	› To assess whether funding supports coherence goals. › For budget performance analysis and comparison of GA vs non-GA instruments.
Spatial overlay analysis (e.g. uptake vs. RBMP zones or Natura 2000)	› Reveals alignment/ misalignment with environmental priorities.	› Technically demanding (GIS skills needed). › Requires compatible spatial datasets. › May not explain 'why' gaps exist.	› To assess geographic targeting of interventions. › When coherence with planning tools (e.g. Water Framework Directive (WFD), Nitrates Directive) [100] is critical.

100 Directive 91/676/EEC.

Stakeholder interviews	› Rich qualitative insight from lived experience. › Identifies synergies/ conflicts between instruments. › Explores administrative burden and alignment with other policies.	› Time/resource intensive. › Subjective and hard to generalise. › Risk of sampling bias.	› To explore practical implementation issues. › When seeking a deep, nuanced understanding from individual perspectives.
Surveys	› Covers larger samples than interviews. › Structured format allows for comparison. › Less resource-intensive per respondent.	› Less depth than interviews. › Risk of bias in poorly designed questions. › May oversimplify complex views.	› When aiming for broader stakeholder coverage. › To complement interviews with a wider perspective.
Focus groups and workshops	› Captures multiple viewpoints and stimulates interaction. › Efficient for collecting rich data from many participants. › Helps reveal consensus or conflict across stakeholder types.	› Risk of dominance by vocal individuals. › Needs skilled facilitation to manage dynamics. › May inhibit candidness on sensitive issues.	› When diverse perspectives are needed. › For discussing coherence between GA and non-GA measures. › To explore trade-offs and collective understanding.
Delphi method.	› Structured expert consultation over successive rounds. › Builds consensus and reduce individual bias. › Useful where empirical data is limited.	› Requires careful planning and time. › Dependent on expert availability and commitment. › Not widely used in GA evaluations.	› For synthesising expert judgement in the absence of strong data. › When aiming to assess systemic performance or prioritisation.
Case study analysis.	› Integrates qualitative and quantitative insights. › Allows contextual, in-depth understanding. › Can identify best practices and systemic challenges.	› Limited external validity. › Data-intensive and resource-heavy. › Often requires triangulation.	› When targeting specific regions, themes, or tools. › To explore interactions between GA, non-GA and external policies. › For deeper exploration of implementation pathways.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

B5 Phase 3: Analysis, outcome and recommendations

B5.1 Carrying out the analysis

B5.1.1 General principles

Based on the framing (Annex B3 Phase 1: Defining the evaluation framework for assessing the coherence of GA) and the selection of data and methods (Annex B4 Phase 2: Selecting indicators, data sources and methods), the analysis of coherence should focus on describing and explaining the quality and intensity of coherence between GA, non-GA and external instruments. The analysis should lead to an informed judgement on how the GA and the CSP have worked coherently towards achieving environmental and climate goals, and in particular the long-term targets of the legislation listed in Annex XIII of the CSP Regulation.

The analysis involves integrating both descriptive results (what types of interactions are observed) and analytical insights (why these interactions occurred and what they imply). At its core, these judgements should articulate the degree to which the policy design and implementation of the GA interventions function as a coherent whole, particularly in relation to environmental and climate objectives. Triangulating findings from different data sources and methods is useful to cross-check findings and come to a judgment.

Five types of interplay between instruments can be used to characterise the level of coherence: complementary action, contradictory action, neutral, overlaps, and gaps. Table 18 below presents definitions for each type of interplay. The analysis should examine the prevalence and distribution of these interaction types for the environmental and climate key elements decided to form the scope of the study, differentiating between planned coherence and coherence in practice.

Table 18. Types of interplay between instruments

Type of interplay	Definition
Complementarity action	The extent to which different instruments reinforce or support each other in achieving shared objectives. High complementarity implies that instruments work synergistically, enhancing the effectiveness and efficiency of policy delivery. For instance, eco-schemes might incentivise broad adoption of sustainable practices, while AECMs provide deeper, targeted interventions, together forming a coherent response to environmental goals.
Neutral	Refer to instances where different instruments neither complement nor contradict each other, for instance, when ANC payments in mountainous areas do not affect the uptake of eco-schemes promoting sustainable livestock practices.
Contradictory action	Refers to instances where different instruments directly conflict with a particular objective. For instance, payments under BISS or CIS may disincentive the uptake of farm practices promoted by eco-schemes or ENVCLIM.
Overlap	Refers to situations where two or more CAP instruments duplicate efforts, potentially leading to confusion in implementation. This may occur, for instance, when an eco-scheme and an ENVCLIM promote the same farm practice without clear additionality in ambition. Overlap may reduce policy efficiency, increase administrative burden for managing authorities and beneficiaries, and obscure accountability for results.
Gaps	Areas where objectives are not adequately addressed by any existing instrument or where synergies are missed due to a lack of coordination or coverage. In the GA, gaps might emerge when certain environmental pressures (e.g. on soil health or landscape diversity) are insufficiently targeted, either geographically or thematically, by CSP interventions.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

B5.1.2 Analysing coherence between GA instruments

Evaluators can use a descriptive table to present interactions between GA instruments. The table below presents examples of interplays between GA instruments. The analysis would lead to a close examination of these interactions for the selected environmental and climate evaluation elements.

It is particularly relevant to highlight where complementarities have amplified environmental effectiveness (indicating where the CAP has actively contributed to achieving long-term environmental and climate targets), where contradictions have limited impact, and where opportunities for greater coherence are missed (gaps) due to indifferent or fragmented policy design. For instance, the combined effect of GA tools on environmental metrics, such as the reduction in nitrogen surpluses (measured by PMEF I.15 and C.39 (gross nutrient balance nitrogen and water quality)), may be linked to the implementation of several instruments, such as conditionality requiring the establishment of buffer strips along water courses (GAEC 4), eco-schemes promoting legume cover crops and ENVCLIM promoting organic farming.

Table 19. Examples of interplays between GA instruments

Intervention	Complementary actions	Contradictory actions, overlap or gap
Conditionality	› Provides a common baseline. › Ensures wide-scale minimum standards. › Ensures coherence when used as a reference point for voluntary GA instruments.	› Weak or uneven implementation may undermine higher-level interventions.
Eco-schemes	› Can build on conditionality and prepare farms for more ambitious ENVCLIM. › Complement ENVCLIM when layered correctly (e.g. rotational grazing and biodiversity payments). › May fund broad participation, increasing environmental coverage.	› Risk of overlap if voluntary schemes compensate for actions already required under GAECs. › Risk of substitution: farmers may prefer simpler eco-schemes over more impactful but demanding ENVCLIM.
ENVCLIM	› Can be aligned with conditionality standards to target specific environmental needs. › Can deepen and support longer commitments to those introduced by eco-schemes.	› May overlap with conditionality if commitments are not well distinguished. › Can be crowded out by eco-schemes if not differentiated in ambition or payment level.
Non-productive investments	› Enhance the effectiveness of ENVCLIM by supporting habitat restoration or planting of landscape features.	› Limited impact if not tied to ongoing management via ENVCLIM or eco-schemes.
Area of natural constraints (ANC)	› May sustain traditional systems with high environmental value, complementing eco-schemes and ENVCLIM.	› Potential overlap with eco-schemes without clear alignment. › May disincentive the adoption of eco-schemes or ENVCLIM.
Areas facing specific disadvantages (ASD)	› Can provide additional incentives to eco-schemes and ENVCLIM for sustainable farm practices, in particularly sensitive areas.	› Potential overlap with ENVCLIM without clear alignment.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Overall, data on instrument uptake can provide perspectives on **the findings from the effectiveness assessment**, i.e. observed impact of the GA on environmental and climate objectives (Annex A), to derive conclusions on how different instrument design and bundles of instruments explain different effectiveness outcomes (e.g. synergistic or trade-offs), focusing in more detail on the interplay between instruments.

Evaluators can also analyse how different CAP interventions have interacted in practice when they cover the same commitments in terms of farm practice. This would compare the specific requirements of the selected interventions and payment rates. For instance, two interventions may support the same type of farm practices, in which case requirements and payments should be adjusted to avoid double funding. Interviews with PAs and farmers would then reveal whether intervention design was complementary or overlapping, creating unintended complexity. The knowledge generated can be helpful to explain levels of efficiency in GA design (see Annex C – Efficiency).

Several issues and questions have been raised in relation to the implementation of the GA [101], some of which could be examined in detail in the coherence assessment, in particular during the collection and analysis of stakeholder perceptions and experiences (see Annex B4.2.2 Uptake and financial analysis):

- The relative role of instruments that are either mandatory or voluntary for the farmer in driving uptake of environmental and climate-positive farm practices.
- The contribution of cross-cutting interventions, in particular KNOW and COOP, in enhancing the uptake of environmental and climate-positive farm practices.
- The role of one-year and multiannual commitments in securing long-term uptake of environmental and climate-positive farm practices.
- The relative role of action-based and result-based interventions in making uptake of environmental and climate positive farm practices attractive to the farmer, while maximising delivery towards environmental and climate objectives.
- The adequacy of financial allocations to environmental and climate instruments, and the benefits and limitations of the specific choices made to meet ring-fencing requirements.
- The distribution of responsibilities and level of coordination and integration across the multiple actors involved in designing and implementing the GA. This could, for instance, examine the role of governance mechanisms to better target ambitious interventions towards priority areas identified by environmental and climate planning tools.

B5.1.3 Analysing coherence between GA and non-GA instruments

Evaluators can compile results on the interplays between the GA and the wider set of CAP instruments.

Evaluators can compile results on the interplays between the GA and the wider set of CAP instruments. This type of analysis should reveal where **complementarities** between GA and non-GA instruments have amplified environmental effectiveness; **contradictions** have limited the impact of GA measures, for example, where income-support, investment or sectoral tools incentivise practices that weaken environmental outcomes; **gaps** arise because fragmentation in policy design prevents GA instruments from being reinforced by non-GA interventions. Table 20 highlights examples of potential interplays.

Evaluators can examine how different CAP interventions interact in practice when they involve similar or mutually relevant **farm practices**. Complementarities may arise when, for instance, productive investments support low-input or organic farming, thereby contributing to the environmental and climate ambition of the CAP. Stronger complementarity would be realised if specific eco-schemes or ENVCLIM interventions support low-input and organic farming practices. Contradictions may, for instance, include basic income support that influences farm viability and input use, or sectoral interventions that indirectly promote crops associated with higher use of fertiliser or pesticide inputs. Identifying such interactions helps explain whether the CAP as a whole reinforces or counteracts the environmental ambition of the GA. Overlap may occur when, for instance, a non-GA intervention may promote a production system or crop choice whose management requirements overlap with those of a GA instrument.

Data on instrument uptake across both GA and non-GA interventions, together with findings from the effectiveness assessment of the GA (Annex A) and other CAP evaluations focused on non-GA instruments, can inform and contextualise findings. This allows evaluators to reach conclusions on how different combinations and interplays of instruments explain variations in effectiveness. The focus lies on understanding how the interplay between GA and non-GA instruments has shaped environmental outcomes, either amplifying or buffering the intended effects of the GA.

101 EU CAP Network, Thematic Group on the Green Architecture: Designing Green Strategies. Available at: https://eu-cap-network.ec.europa.eu/thematic-group-green-architecture-designing-green-strategies_en.

Table 20. Examples of interplays between GA and non-GA interventions

CAP Intervention	Complementary actions	Contradictory actions, overlap or gap
Income support (BISS, CRISS, CIS)	› Use of CIS on legumes to support maintenance of extensive livestock systems, e.g. reinforcing an eco-scheme supporting the extensification of livestock systems.	› Use of CIS maintaining high-density livestock systems, e.g. undermining ENVCLIM promoting extensification.
Sectoral interventions	› Use of sectoral interventions to promote sustainable production practices of members of producer organisation through a whole value chain approach, from supporting farm level adoption to facilitating collection and marketing of products, and promoting sustainable quality labels.	› Sectoral intervention supports investments to increase productivity at the expense of environmental performance.
Productive investments	› Investments into invest in equipment and infrastructure in organic fruit and vegetable production and supply chains, reinforcing eco-schemes and ENVCLIM interventions for maintaining or converting to organic farming.	› Investments in infrastructure leading to increased resource use, such as water storage schemes. › Investments not taking into account environmental conditions and sensitive areas, such as livestock sheds leading to negative changes in grazing patterns.
Knowledge and innovation (Advisory services, training, EIP, demonstrations)	› Facilitate uptake of GA tools. › Promote understanding of ecosystem services and regulatory compliance.	› Environmental focus not prioritised in training content.
Cooperation (cooperation and European Innovation Partnership for agricultural productivity and sustainability (EIP-AGRI groups))	› Support collective environmental management and innovation. › Facilitate landscape-scale planning and knowledge sharing. › Enable testing and scaling of agri-environmental solutions.	› Environmental focus not prioritised.
State aid measures (national-level complementary instruments)	› Ensure continuity of support where GA demand exceeds available funding. › Enable flexible responses to regional environmental challenges. › Complement or expand the reach of CAP-funded GA measures.	› Risk of undermining CAP-wide coherence if not aligned with CSP objectives. › Potential overlap with CAP funding if not carefully managed.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

B5.1.4 Analysing coherence with external environmental and climate instruments

To show the contribution that the GA makes towards external environmental and climate legislation, evaluators can compile results on interplays into a consolidated table. Table 21 below highlights a non-exhaustive list of examples of such interplays.

It is important that evaluators go beyond simply identifying the presence in the GA of measures relevant to the different pieces of legislation selected and examine whether GA instruments are strategically targeted to environmental needs, offer additional commitments beyond legal baselines, and are backed by sufficient uptake, funding, and monitoring mechanisms. Evaluators should assess whether there is coherent alignment with national or regional planning tools (e.g. PAFs, RBMPs, nitrate action plans).

Table 21. Example of interplays between GA and external environmental and climate instruments

Selected environmental and climate legislation	Examples of complementary actions	Examples of non-complementary actions, including overlaps or gaps
Water Framework Directive (WFD) (Directive 2000/60/EC)	› GAECs 4–6 promote erosion control and buffer zones. › ENVCLIM and eco-schemes support reduced input use near water bodies. › Spatial targeting enables alignment with RBMP priority areas.	› Poor targeting and limited uptake of GA measures in high-risk catchments. › Disconnection between CSP and RBMP planning. › Risk of supporting ineffective practices in sensitive zones.
Nitrates Directive (Directive 91/676/EEC)	› Conditionality (SMR, GAEC 4–6) reinforces baseline pollution control. › ENVCLIM and eco-schemes promote fertiliser reduction and cover crops. › Advisory services support nutrient planning.	› GA instruments may pay for actions already mandatory in NVZs. › CAP support may not extend to polluted areas outside NVZs. › Weak coordination with Nitrates Action Programmes.
Habitats & Birds Directives (Directives 92/43/EEC & 2009/147/EC)	› Eco-schemes and GAEC 8 promote landscape elements. › ENVCLIM support adapted farming practices (e.g. grazing mowing etc.) in areas of importance for EU protected habitat types and species identified in the PAF planning tools. › Non-productive investments contribute to habitat restoration.	› Poor targeting and low uptake of GA interventions in Natura 2000 and HNV areas. › Exemptions on conditionalities (e.g. GAEC 8 and 9) weaken habitat protection. › GA interventions undermining management requirements of EU protected habitat types and species.
Sustainable Use of Pesticides Directive (Directive 2009/128/EC)	› Eco-schemes and ENVCLIM encourage IPM. › Organic farming is promoted through GA instruments. › Training and advisory tools support best practices.	› Conditionality lacks specific measures requiring the implementation of IPM [102]. › Few IPM measures supported by eco-schemes and ENVCLIM.
EU Climate Law, Effort Sharing Regulation and LULUCF (Regulation 2021/1119, 2018/842 and 2018/841)	› GAEC 1 and 2 support carbon stock maintenance on peatland and grassland. › Eco-schemes and ENVCLIM promote carbon farming and reduced tillage.	› Weak enforcement of GAEC 2 on wetland and peatland preservation. › Few resources allocated to investments in renewable energy. › Use of coupled support for livestock may counterbalance gains.
NEC Directive/ Air Quality Directive (Directives 2016/2284 and 2008/50/EC)	› ENVCLIM and eco-schemes include measures reducing ammonia emissions. › Investment support for low-emission manure techniques. › Nutrient planning promoted via advice and training.	› No explicit air quality objectives in CSPs. › Weak spatial focus on emission hotspots. › Lack of integration with national air quality strategies.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

102 A MS can choose to add the requirement as part of additional GAEC. If this is not done, then this could be pointed out in an analysis of coherence.

B5.1.5 Overall judgement

Based on a detailed understanding of the interactions, the observed coherence can be presented using a 'screening matrix', i.e. a matrix to map the strength and nature of interactions between components of the GA from the rest of the CSP and other, non-CSP, environmental and climate instruments:

- **The type of interplay** (e.g. complementary action, contradictory, neutral, overlap, gap) can be noted according to their perceived effect.
- **The strength** can also be assigned especially with regard to the level of complementarity or contradictions.

Table 22 below presents a theoretical example of a screening matrix showing results for internal GA coherence, coherence of GA instruments with other CSP instruments and the external coherence.

Table 22. Example screening matrix of GA internal and external coherence towards achieving improvement in water quality [103]

	GAEC A	Eco-scheme A	ENVCLIM A	ENVCLIM B	Non-prod. INVEST A
GA Instruments					
GAEC A					
Eco-scheme A	S+				
ENVCLIM A	S+	S++			
ENVCLIM B	S+	S++	0		
Non-productive INVEST A	N	S+	S+	S+	
Non-GA instruments					
BISS	S+	N	N	N	N
Productive INVEST A	N	C-	C--	C--	C-
EIP	N	C+	C++	C+	N
Environmental and climate planning tools					
WFD-RBMP	S+	S+	S++	S++	S++
Habitats and Birds Directive – PAF	N	S+	S+	S+	S+

Legend: (S+) for complementarity action/synergy (adding other '+' depending on the strength of the complementarity), (C-) for contradictory action (adding '-' depending on the strength of the contradiction), (N) for no synergy, (O) for overlap and (G) for gaps

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

103 Note: The table shows the quality and strength of synergies of instruments towards the objective of improving water quality. For instance, ENVCLIM A and B are deemed to work in strong synergy with eco-scheme A. Productive INVEST A is however assessed to contradict the action of ENVCLIM A and strongly contradict the action of ENVCLIM B. In contrast, BISS is deemed to have a neutral stance on the actions of GA interventions, though it contributes to the action of GAEC A (since farmers must meet the GAEC requirements to receive BISS).

An overall judgement must answer to what extent, how and why coherence was or was not achieved. This includes examining the underlying design and governance factors that shaped interactions, for instance:

- Did instrument objectives, scope and supported farm practices of CAP instruments (GA and non GA) support complementary or contradictory action?
- Did eligibility criteria, targeting mechanisms, or payment rates support coordinated implementation or create confusion and overlap?
- Did instruments work to support uptake within priority areas or policy goals, or were spatial/sectoral misalignments observed?

The overall judgement should not only summarise observed interactions but also provide a diagnostic narrative: where the GA worked as a system to achieve environmental and climate goals, where it did not and created trade-offs between CAP objectives, and what policy design, implementation or governance factors explain these patterns. It should end with clear reflections on what should be improved to increase coherence, both theoretically (in design) and practically (in delivery).

B5.2 Examples of types of outcomes and recommendations

The coherence assessment may help in providing several types of conclusions and recommendations with regard to the design of the CAP 2023-2027 and future CAP design, which overall would allow a more effective GA to be designed.

Strategically, the coherence analysis can help MA understand where policy design and implementation can be strengthened to maximise complementarities and reduce trade-offs between instruments. It can demonstrate how smarter targeting and clearer sequencing between conditionality, eco-schemes, and AECMs amplify environmental performance; how better integration with income support and other GA and non-GA instruments, such as investments and cooperation measures, can enhance uptake; and how closer alignment with environmental legislation can increase the contribution of the CAP to EU Green Deal objectives. The results can potentially guide future CSP amendments, but even more likely, the preparation of post-2027 programmes by highlighting where interventions need recalibration, in targeting, payments, or governance, to improve policy integration and coherence across instruments and levels of action.

Operationally, the coherence assessment can yield actionable recommendations for both programme design and governance reform. These include establishing explicit 'progression logics' between GA instruments; strengthening spatial and thematic targeting to align with environmental priorities; embedding coherence checks into CSP reviews; improving the integration of monitoring frameworks across CAP and environmental reporting systems; and reinforcing interdepartmental coordination and stakeholder dialogue. The actions help ensure that policy instruments collectively reinforce rather than offset one another, allowing the CAP to deliver a more unified and effective contribution to climate mitigation, biodiversity conservation and sustainable resource management.

The outcomes of the coherence analysis and the subsequent recommendations should be taken in light of the outcomes of the effectiveness analysis and efficiency analysis, in order to ensure that any recommendations to enhance coherence are also cost-effective and contribute to streamlining and simplifying administrative procedures while maximising synergies and addressing trade-offs of different bundles of instruments.

Table 23. Indicative examples moving from coherence analysis findings to evaluation recommendations and consequent possible actions

EQ	Typical coherence analysis finding	Example of recommendation from an evaluator	Example of MA/PA action/use
EQ3 - Internal GA coherence	- Conditionality, eco-schemes, and AECMs support similar practices without clear sequencing, leading to duplication or substitution.	- Establish a clear 'progression logic' among GA instruments (conditionality → eco-schemes → AECMs), ensuring differentiation in ambition, payment, and duration. - Introduce complementarity checks during CSP revisions.	- Revise CSP intervention logic to clarify layering. - Develop an internal 'coherence screening' template for all interventions. - Require justification of additionality. - Amend payment methodologies to reward higher environmental ambition.

EQ	Typical coherence analysis finding	Example of recommendation from an evaluator	Example of MA/PA action/use
	› Weak or uneven implementation of conditionality undermines higher-level interventions.	› Reinforce coherence and enforcement of GAEC standards to strengthen the baseline for voluntary instruments.	› Review the content of the GAECs. › Improve coordination of control and auditing.
	› Eco-schemes, ENVCLIM and other voluntary area-based interventions (e.g. ASD) are not tailored to the CSP needs and priorities, and provide weak incentives for uptake.	› Enhance targeting and prioritisation. › Increase payment incentives and/or introduce or strengthen result-based schemes.	› Review content and eligibility conditions of interventions. › Recalibrate payments.
	› Non-productive investments are not complementing eco-schemes and ENVCLIM.	› Bundle non-productive investments with AECM contracts.	› Design 'integrated packages' combining investments and management commitments over multiple years.
	› Inconsistent monitoring and missing indicators across GA instruments hinder tracking of synergies and trade-offs.	› Strengthen the performance framework by refining indicators according to more specific environmental and climate topics.	› Create integrated monitoring dashboards across GA instruments.
	› Farmers report administrative complexity and a poor understanding of how GA instruments connect.	› Simplify guidance and communication to farmers on the hierarchy and complementarity of GA instruments.	› Produce layered participation guides; integrate advisory support via agricultural knowledge and innovation systems (AKIS).
EQ4 – Coherence between GA and Non-GA interventions (internal CSP coherence)	› Coupled income support, sectoral interventions and productive investments incentivise intensification in sensitive areas, conflicting with GA objectives.	› Enhance the role of specific interventions for systemic transitions (e.g. sectoral support). › Enhance environmental 'breaks' and requirements on CIS, sectoral interventions and productive investments.	› Apply stocking-rate limits or minimum water savings. › Exclude high-risk areas from potential beneficiaries. › Set a minimum percentage of sectoral budgets for environmental actions.
	› Knowledge and innovation interventions insufficiently support GA uptake.	› Enhance integration of AKIS with GA design and monitoring to improve synergy and learning.	› Bundle GA participation with advisory programmes. › Track GA uptake among trained beneficiaries.

EQ	Typical coherence analysis finding	Example of recommendation from an evaluator	Example of MA/PA action/use
	› Cooperation measures are underused to foster collective environmental management.	› Scale up cooperation and EIP-AGRI actions that complement GA instruments at landscape level.	› Fund cooperation groups targeting eco-schemes/ AECMs in priority zones; integrate with AKIS.
	› Disproportionate funding to income support limits the relative weight of GA measures.	› Rebalance financial allocations to strengthen environmental orientation of CSPs.	› Reallocate CSP financial allocation in mid-term review. › Justify financial allocation changes based on coherent outcomes.
EQ5 – External coherence with environmental and climate legislation	› GA measures are not aligned with geographic priority areas of environmental planning tools (RBMPs, Natura 2000, NVZs).	› Strengthen spatial targeting to ensure interventions address areas of highest environmental pressure.	› Make prioritisation mandatory for eco-schemes and ENVCLIM.
	› GA interventions fund actions already mandatory under environmental directives (e.g. NVZ fertiliser limits).	› Ensure additionality by distinguishing voluntary GA commitments from legal obligations.	› Revise eco-scheme and ENVCLIM eligibility. › Exclude practices required under NVZs or other baseline rules.
	› Limited contribution of GA to long-term EU environmental and climate targets due to low uptake or ambition.	› Re-align GA with quantified targets under WFD, HD, NECP and climate law. › Strengthen ambition and incentives for participation.	› Recalibrate payment rates to higher ambition levels. › Focus support on high-impact measures and target areas.
	› Insufficient integration of monitoring protocols between CAP and environmental reporting frameworks.	› Develop common or harmonise indicators across CAP and environmental planning tools (WFD, NECP, etc.) for coherent reporting and evaluation.	› Establish joint data exchange protocols between agricultural and environmental authorities.
	› Limited stakeholder coordination and weak governance mechanisms linking CAP and environmental authorities.	› Introduce structured governance arrangements for cross-policy coordination during the design, implementation and evaluation of CSPs.	› Improve the representation and engagement of the different actors in the monitoring committees. › Include joint reviews with environmental and climate authorities in Monitoring Committees.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Annex C – Efficiency

This annex provides guidelines on implementing an efficiency analysis of the GA. It enables an assessment of the cost-effectiveness of the GA, as well as of the administrative costs and potential for simplification for stakeholders concerned by the GA, including both administrations and beneficiaries.

C1 Rationale and scope of efficiency guidance

C1.1 Rationale for assessing the efficiency of the GA

The efficiency criterion refers to the relationship between the resources used by the GA and the changes or effects generated (which may be positive or negative), addressing whether the GA achieved its objectives using the fewest resources necessary. In general, efficiency analysis examines the costs incurred by different stakeholders, identifies the factors driving these costs and their link to the intervention, and compares the identified costs to the benefits recorded in terms of the effectiveness criterion. It examines costs (e.g. support to beneficiaries, administrative costs, etc.), evaluates the proportionality of costs and benefits, and identifies potential opportunities for simplification and burden reduction. The support payments to beneficiaries and administrative costs are two essential costs related to the implementation, compliance, and oversight of the GA as a whole or of bundles of homogenous interventions.

The Implementing Regulation for monitoring and evaluation [104] reinforces this by stating that, "When assessing the efficiency of their CAP Strategic Plans Member States shall analyse whether the effects or benefits of the CAP Strategic Plans were achieved at a reasonable cost and shall assess simplification both for beneficiaries and for the administration, with special focus on administrative costs and the use of digital tools and satellites".

Efficiency, in terms of **cost-effectiveness,** measures how effectively resources are converted into tangible outcomes that align with policy goals. Cost-effectiveness at the level of individual interventions is routinely measured in evaluations, typically by calculating the ratio of achieved results or effects to the financial resources expended. For the evaluation of the GA, it is meaningful to examine cost-effectiveness by assessing the combined impact of GA (e.g. the findings from the effectiveness analysis) compared to the total costs, e.g. the support payments to beneficiaries as well as any cost associated with administration (administrative costs). Thus, one can think of cost-effectiveness as a ratio of effectiveness (nominator) to the resources spent in achieving the effects (denominator) or vice versa, depending on the required information. The ratio implies that 'effectiveness', as calculated according to Annex A, will be used for the nominator. For the denominator, the efficiency analysis will estimate the direct and administrative costs associated with implementing the GA.

Support paid to beneficiaries for area-based interventions is, usually, the compensation for income forgone or compensation for additional costs required by the beneficiary to engage with the practice supported for ENVCLIM or eco-scheme, the compensation to comply with the mandatory requirements in place under Natura 2000 or RBMPs in ASD, the compensation for disadvantage in ANC or, sometimes, a top-up to BISS for eco-schemes only. For green investments, training or advice, the cost may be the actual or standard cost or the unit amount multiplied by the output. For the present work, all these cost elements comprise the support paid to beneficiaries, i.e. the direct costs.

Administrative costs refer to the expenses incurred by public authorities (MA, PA, control bodies, etc.) and beneficiaries (farmers) to manage, implement and monitor CAP environmental and climate-related interventions. Administrative costs are associated with policy management and oversight rather than the content or rules of the measures. For public administrations, personnel costs and expenses related to processing applications for eco-schemes, ENVCLIM or INVEST, as well as conducting on-the-spot checks and remote sensing inspections, are examples of administrative costs. For farmers, examples of administrative costs are the time and cost of applying for support schemes (e.g. preparing ENVCLIM applications), record-keeping and reporting obligations (e.g. logs of pesticide use or field management), participating in training and advisory activities required for eligibility, and other administrative efforts that are not compensated by the corresponding interventions. These costs can stem from requirements defined and determined at the EU, national, regional and/or local levels. Usually, out-of-pocket administrative costs are compensated through CAP support to beneficiaries. For example, costs associated with baseline soil analysis or contracting consultants to support the beneficiary in writing an investment proposal or environmental management plan are eligible expenditures.

To assess the efficiency of the GA, administrative costs also include the potential costs incurred from imposing conditionality requirements, sometimes referred to as regulatory costs. This type of administrative cost is incurred due to compliance with rules and obligations set by law or policy. The regulated parties and farmers bear the regulatory costs directly as a result of the policy obligations. For example, farmers complying with GAEC 4 must maintain soil cover to prevent erosion, a requirement that incurs costs. Other regulatory and compliance costs may not incur direct expenses but may be associated with a loss of revenue due to environmental commitments or conditionality. The interventions typically offset regulatory costs; however, regulatory costs associated with implementing conditionality are not always directly offset. Often, the environmental benefits of regulatory compliance translate indirectly into production benefits for farmers, such as increased fertility or reduced risk. These are not accounted for in the efficiency calculations.

104 Article 1, paragraph 3 of Commission Implementing Regulation (EU) 2022/1475 of 6 September 2022 laying down detailed rules for implementation of Regulation (EU) 2021/2115 of the European Parliament and of the Council as regards the evaluation of the CAP Strategic Plans and the provision of information for monitoring and evaluation: https://eur-lex.europa.eu/eli/reg_impl/2022/1475/oj/eng.

Following the discussion above, **cost-effectiveness is a ratio of the GA's effect on key elements to the resources spent** (see below). The resources spent include both the support directed to beneficiaries and the administrative costs to the beneficiaries and the administration (MAs). To estimate this, the nominator, e.g. the effects on key evaluation elements, will be the outcome of the effectiveness analysis. The first part of the denominator, e.g. the financial support to beneficiaries, is also easily retrievable. Thus, **the main aim of the efficiency analysis is to identify, determine and measure the administrative cost to beneficiaries and the administration**. When this is calculated, the cost-effectiveness ratio can be calculated and interpreted.

$$\text{Cost-effectiveness of GA} = \frac{\text{effectiveness of GA}}{\text{Total cost of GA (support+administrative)}}$$

The GA's efficiency in achieving 'enhanced environmental and climate results' may be compromised by the **administrative burdens** it imposes on both the administration and the farmers. Excessive administrative burden can lead to several outcomes, such as:

1. Deterrence to participation, especially in all voluntary schemes such as eco-schemes and ENVCLIM, may result in lower participation rates if farmers perceive the administrative requirements as too onerous or if the administration faces difficulties in managing and monitoring.
2. Reduced compliance where even mandatory requirements, like conditionality, may not be fully complied with if farmers find the procedures too complex or time-consuming, and the administration is incapable of monitoring and checking [105]. Non-compliance can result in penalties, further straining farmer resources and potentially leading to disengagement from the CAP.
3. Inefficient use of resources, particularly when time and effort are spent on administrative tasks, diverts attention away from actual farming activities and investments in sustainable practices. This inefficiency can hinder the achievement of the special objectives associated with the GA.
4. Financial stress is imposed by high administrative costs, which can disproportionately affect smaller farms that may lack the resources to manage complex compliance requirements. Such a situation can exacerbate inequalities within the agricultural sector and undermine the CAP's goal of supporting viable farm incomes [106].

Thus, there is a strong motivation to assess the efficiency of the GA, which may inform policy design by taking into account aspects of simplification and burden reduction. An efficiency analysis will offer a range of outcomes, including cost-effectiveness ratios, benchmarking results and recommendations for reducing administrative costs, increasing the adoption of simplification measures, minimising delivery costs and others. A recent publication on simplification and administrative burden for farmers and other beneficiaries under the CAP [107] and other studies [108] provide many ideas for a structured way to evaluate and identify opportunities for simplifying regulations. In the context of the GA, this may imply, for example, reducing the complexity of GAECs and support schemes, clarifying rules and requirements through better communication, minimising reporting obligations, etc, while not diminishing the environmental and climate outcomes. For this, care is needed to ensure that simplification does not significantly affect support schemes, which may require some complexity to deliver their environmental and climate outcomes.

C1.2 Scope of the guidelines

The scope of these guidelines on how to carry out an efficiency analysis covers two aspects:

1. Reflections on cost-effectiveness insofar as the GA's effectiveness is concerned.
2. Examination of how to assess efficiency in terms of the administrative burden and how efficiency can be improved by reducing it.

A flexible approach to efficiency analysis is proposed, allowing analysis at different levels of aggregation, including the GA as a whole, bundles of interventions or even individual interventions.

In general, the effectiveness analysis sets the framework for the efficiency analysis, as strict compliance between the two is required. Thus, efficiency analysis should adopt the same unit of analysis, timeframe and baseline as effectiveness analysis. Therefore, the unit of analysis for cost-effectiveness must be the same as that used in the corresponding effectiveness analysis (e.g. the key elements/SO chosen for analysis). For example, suppose the key element is CO_2-equivalent reduced emissions due to interventions under SO4. In that case, the efficiency analysis will take into account the support to beneficiaries and administration costs incurred by enhanced conditionalities and interventions aimed at reducing CO_2 emissions under SO4. Thus, this explicitly allows for analysis at a level smaller than the entire GA.

105 "For 73% of farmers responding to the European Commission's targeted consultation on simplification (TC), GAECs are 'highly complex'. Other environmental and sanitary rules were considered slightly less complex ('high complexity' ranging from 57%, for animal welfare and animal health to 67% for pesticides)" (page 37) of European Commission, Directorate-General for Agriculture and Rural Development (Unit A.3), *Study on simplification and administrative burden for farmers and other beneficiaries under the CAP*, Brussels, 2025, https://eu-cap-network.ec.europa.eu/publications/study-simplification-and-administrative-burden-farmers-and-other-beneficiaries-under_en.

106 An ECA special report refers to the Commission's Impact Assessment for the Strategic Plans Regulation, which "estimated a reduction in farmers' income of between 5% and 10% for various scenarios, due to the combined effect of budget reductions and the additional green requirements". It also refers to a study which estimated that the enhanced conditionality and eco-schemes would result in an income decrease of 2.1% to 3.5% for farmers compared to the previous CAP, mainly due to additional constraints on farming and increased compliance costs (see Petsakos, A., et al., *Farm-level impacts of the CAP post-2020 reform: A scenario-based analysis*, Applied Economic Perspectives and Policy, 2023, 45(2):1178, https://dx.doi.org/10.1002/aepp.13257).

107 See footnote 105 for the full Simplification study (2025) reference.

108 European Commission, Directorate-General for Agriculture and Rural Development, Chartier, O., Krüger, T., Folkeson Lillo, C., Valli, C., et al., *Mapping and analysis of CAP strategic plans – Assessment of joint efforts for 2023-2027*, Chartier, O. (editor), Folkeson Lillo, C. (editor), Publications Office of the European Union, Brussels, 2023, https://op.europa.eu/en/publication-detail/-/publication/80d12120-89bc-11ee-99ba-01aa75ed71a1/language-en.

For example, in identifying administrative costs for farmers, the unit of analysis is the beneficiary, which could be a farm enterprise or a group of farmers. For public administrative costs, the unit of analysis can be per activity (e.g. management, monitoring, audit, control), per regulatory instrument, per agency (e.g. MA, PA), per employee, per intervention or other relevant categories. This cost is then allocated to the corresponding beneficiaries using an accounting rule, e.g. proportionate to the size of the support. The study timeframe is the current programming period for CSPs (2023-2027) [109]. The involvement of stakeholders is guided by whose perspective on efficiency matters most. Thus, farmers, policymakers, MA and PA personnel, environmental NGOs and farm consultants could be involved without excluding other stakeholders who may be crucial in some instances.

In the specific context of this efficiency analysis, stakeholders refer to all parties directly or indirectly affected by the design, implementation, administration or outcomes of the GA. This includes both those who bear administrative or compliance costs and those who benefit from or influence the environmental and climate impacts of the interventions. In this context, farmers play the dual role of beneficiaries receiving support payments for implementing GA interventions and as stakeholders who bear administrative and compliance costs associated with these measures. Their participation, experiences, and feedback are essential for assessing both the cost-effectiveness and the administrative efficiency of the GA.

In defining the scope of the efficiency guidance, the effectiveness analysis provides input by providing the 'effect' for which public resources were spent, i.e. the nominator of the cost-effectiveness ratio. The support directed to beneficiaries for the GA is also known. The central effort of the efficiency analysis is to determine the administrative costs for beneficiaries and the administration, informing the estimation of the cost-effectiveness ratio (see Figure 2 in Chapter 3.2). The coherence analysis complements the efficiency analysis, possibly by shedding light on how the interplay among the GA instruments provides answers to the 'why and how' certain aspects are observed. For example, the coherence assessment can help to better understand how synergistic or overlapping instruments influence delivery, stakeholder experience, and overall administrative burden for MA, PA and farmers.

C2 Key aspects of the efficiency guidelines

The efficiency analysis of the GA differs from a conventional efficiency analysis of individual environmental or climate interventions because of its structure, specifically its focus on the designed interplay among the GA's components and objectives. The combination of conditionalities and interventions, along with the multi-objective and integrative nature of GA, requires a tailored approach to assess efficiency, defined here as the **cost-effectiveness resulting from the effectiveness and the cost of implementing GA, including administrative costs, i.e. the burden on beneficiaries and the administration**.

The starting point is a cost-effectiveness analysis, defined as the ratio of effects to resources or resources to effects (see Annex C1.1 Rationale for assessing the efficiency of the GA above). The GA design can affect both the nominator and denominator of the cost-effectiveness ratio. There is evidence that the GA's synergies or unintended trade-offs can affect, positively or negatively, the overall 'effectiveness' (as described in Annex A), and as such also affects the efficiency of the GA, as again, the nominator for the cost-effectiveness assessment is the 'effectiveness' calculation (e.g. a quantifiable impact) derived directly from the effectiveness analysis.

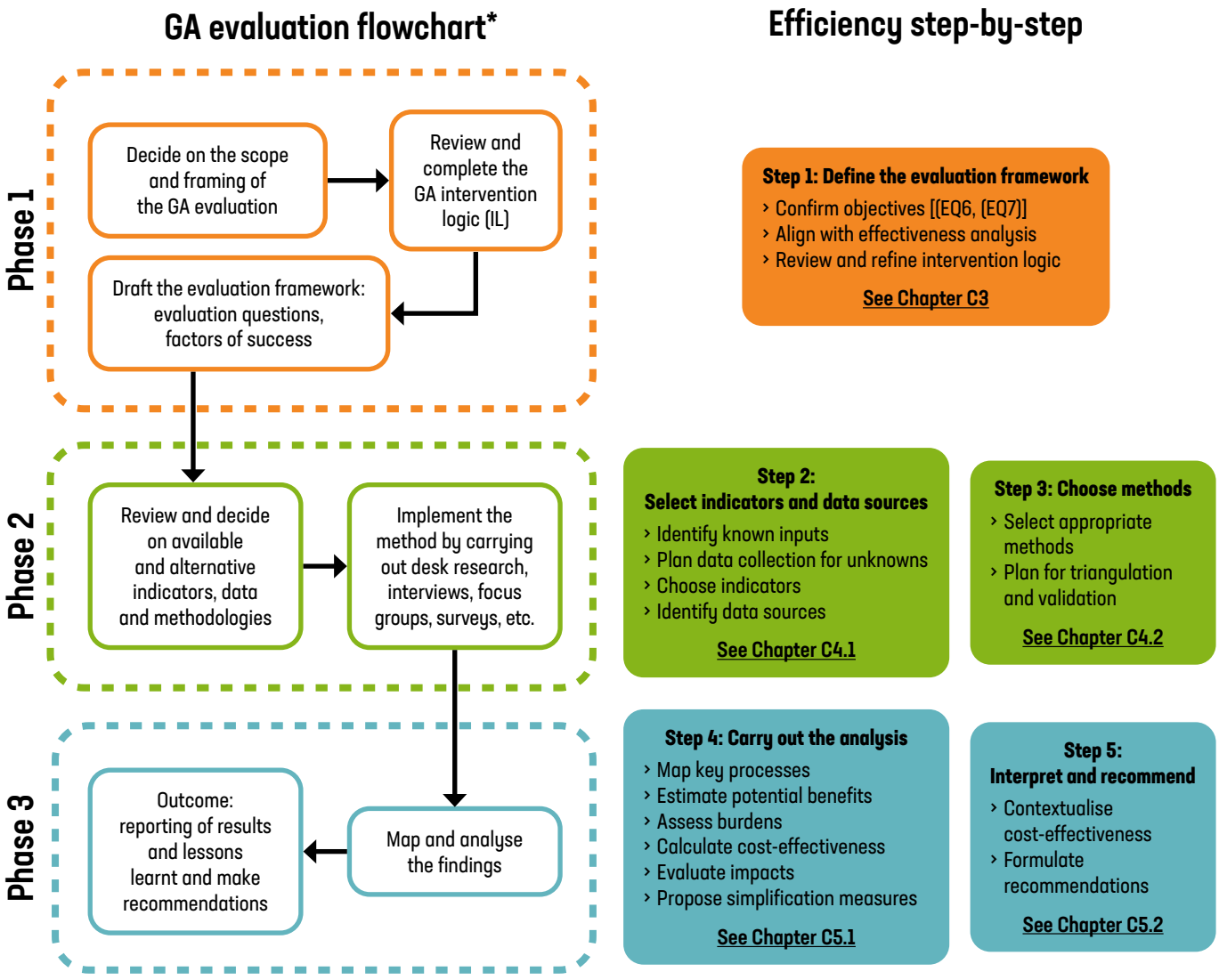
Similarly, the costs of implementing the GA are derived from its design. The total support payments to beneficiaries are straightforward to determine. This does not apply to total administrative costs because they depend on the GA design chosen and pursued by the MS. For example, many GA designs have intentionally shifted to shorter and simpler commitments, often resulting in lower administration costs and attracting more farmers. For instance, situations emerged where a MS decided to move complex, multi-annual schemes out of the CAP into national schemes or convert them into simpler eco-schemes, leaving the GA with simpler and easily manageable interventions. This simplification, for example, may affect administrative costs and effectiveness. Other MS adopted a 'menu approach' offering several measures that farmers can choose from, with top-up payments available for additional measures that can be combined with the baseline measures. A third way was pursued by another MS, which supported the implementation of green instruments through a collective approach involving cooperatives. Finally, in some MS, the GA has been designed to support a 'specialisation' of interventions, with ENVCLIM targeting specific, more in-depth biodiversity issues (SO6 activities) and eco-schemes targeting more climate and resource issues (SO4 and SO5 activities).

Thus, it is evident that this diversity in targeting, sometimes through elaborate eligibility criteria, spatial tailoring, the specialisation of interventions and the quest for additionality, is a key design factor affecting the cost-effectiveness of GA by influencing administrative costs. All these aspects will impact the overall cost-effectiveness of the GA, allowing conclusions to be drawn on how a potential reduction in costs and burdens impacts the effectiveness. For example, does an increase in cost-effectiveness result in the same level of environmental and climate outputs, or is the effectiveness of the GA compromised when cost-effectiveness is increased?

The guidance on the assessment of the GA efficiency follows the three phases of the evaluation flowchart, applied also for the effectiveness and coherence assessments, as shown in Chapter 3.3. In Figure 6 below, these three phases are translated into more practical steps (a checklist) for the efficiency analysis, which will be further described in the following chapters.

109 For identifying the costs, it is suggested to use a 'typical' year with average uptake rates for the analysis of costs. This means that the first years of a period (where uptake increases gradually) and the last year (where uptake is often above average) are not recommended.

Figure 6. Step-by-step process for the assessment of the efficiency of the GA



*See the full GA evaluation flowchart in Chapter 3.3

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

C3 Phase 1: Defining the evaluation framework for assessing the efficiency of GA

C3.1 Deciding on the framing of the evaluation

The first phase aims to define the boundaries and key elements that determine the structure of the efficiency analysis of the GA, including what it measures and the conclusions that can be drawn. The framing of the evaluation refers to the objective, the units of analysis, the timeframe, the involvement of stakeholders and any comparative frameworks the evaluators may use.

The proposed approach to the efficiency analysis outlined below assumes that the GA's 'effectiveness' will be known from the effectiveness analysis (see Annex A), and payments to beneficiaries linked to key evaluation elements or impact indicators could be identified from the APR or made available by the PA. If this is the case, the efficiency analysis may focus on:

1. Estimating the administrative costs for beneficiaries and the administration (proposed EQ6); and
2. Using these costs to calculate an overall cost-effectiveness indicator for GA (proposed EQ7).

Hence, the first step is to **decide whether both aspects should be covered** by the efficiency analysis or only the first. The cost-effectiveness assessment requires the administrative cost as an input; therefore, it cannot be done without undertaking this step.

Secondly, the **key evaluation elements** for which efficiency is assessed should be determined. The most logical approach is to evaluate efficiency for the same key elements for which the effectiveness analysis was conducted, using the same baseline and timeframe. During this step, a detailed review of the **intervention logic** [110] should be carried out (see also Chapter 2.1.2), particularly with respect to clarity and completeness in capturing aspects of efficiency. This step involves systematically verifying whether the intervention logic clearly illustrates the relationship between resources invested – including financial costs, administrative burdens and time allocations – and the anticipated outputs, results, and ultimately impacts of the interventions. This phase should ensure that the intervention logic transparently represents assumptions related to efficiency, such as expected cost-effectiveness, the scale of administrative costs relative to environmental benefits or economies of scale achieved in implementing specific measures due to their orchestration under the GA. If these elements are not included in the CSP, the evaluator, with the assistance of the MA, may complete and update the intervention logic to contain as much of the information as possible.

Thirdly, the efficiency-related **EQ** should be defined and accompanied by an appropriate **FoS**, which allows for a judgement to be made. Proposals for these are set out in the following section.

By thoroughly conducting these preliminary activities – i.e. defining a clear scope, refining and validating the intervention logic, and confirming EQs and FoS – the efficiency evaluation will be strongly positioned alongside the coherence and effectiveness evaluations to provide insightful, credible and actionable assessments of the GA's efficiency.

C3.2 Proposed EQs and FoS

This section proposes two basic EQs and their corresponding FoS regarding the efficiency of the GA (see below).

Table 24. EQs and FoS for GA efficiency

Evaluation question	Factor of success
EQ6: To what extent is the implementation of the GA simple in terms of administrative costs for beneficiaries and the administration?	The administrative costs of delivering the GA, both for beneficiaries and the administration, are minimised.
EQ7: To what extent are the costs of GA implementation justified, given the effects the GA has achieved?	Implementation of the GA is cost-effective.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025) [111]

110 CAP Strategic Plans include elements of the intervention logic of the GA in Section 3.1, of conditionalities in Section 3.10 and of the three relevant SO in Sections 2.1.SO4.4, 2.1.SO5.4, and 2.1.SO6.4.

111 Article 1(3) of Commission Implementing Regulation (EU) 2022/1475.

EQ6: To what extent is the implementation of the GA simple in terms of administrative costs for beneficiaries and the administration?

EQ6 focuses on the extent to which the implementation of the GA is simple in terms of administrative costs for both beneficiaries and administration. Its FoS implies minimising unnecessary delivery costs, limiting costs strictly to those required for achieving policy objectives and increasing the adoption of simplification measures if needed.

EQ6 may be further refined into evaluation sub-questions, tailoring the evaluation to specific needs identified. The sub-questions can examine the efficiency of the implementation process, particularly in terms of administrative costs. First, by determining whether the administrative burden of delivering GA measures is minimised for beneficiaries (such as farmers) and the administrative bodies involved. Second, by investigating whether the costs incurred in delivering the CAP are strictly necessary to achieve policy objectives, it encourages scrutiny of any avoidable expenses. Another focus of evaluation sub-questions may be on adopting simplification measures and evaluating whether steps are being taken to streamline processes and reduce unnecessary complexity. Whenever questions about possible simplification are contemplated, the evaluation may examine whether simplification is promoted at the expense of environmental and climate benefits. Refining the EQ into sub-questions which collectively address the broader issue of administrative efficiency ensures that the implementation of the GA achieves its intended environmental and climate outcomes in a cost-effective and user-friendly way for all stakeholders involved.

EQ7: To what extent are the costs of GA implementation justified, given the effects the GA has achieved?

EQ7 examines to what extent its achieved effects justify the costs of GA implementation. The FoS assesses whether the GA achieves its intended environmental and climate effects or benefits at the lowest costs possible.

This EQ can be further refined and deployed across various sub-questions, which together would enable a comprehensive assessment of the cost-effectiveness of the GA's implementation. Evaluations may be interested in examining the cost-effectiveness of a smaller set of individual interventions, e.g. whether organic farming can reduce methane GHG emissions at lower cost than supporting improved manure management. In addition, an evaluation may be interested in examining the cost-effectiveness of an SO. For example, the cost-effectiveness of SO4 in reducing GHG emissions can be compared with the price of carbon or the cost-effectiveness of climate change mitigation measures outside the CSP. Of course, determining and calculating the outcomes is part of the effectiveness analysis.

One can also investigate whether the design of GA schemes incorporates features known to improve cost-effectiveness, such as clear objectives, targeted payments that account for spatial differences in compliance costs, high standardisation of measures, consistent support for long-standing measures, and payment rates that accurately reflect income foregone and transaction costs.

Further, benchmarking can be used to compare the costs and outcomes of various interventions within the same MS and against those in other MS with similar conditions, allowing evaluators to determine value for money and identify areas for improvement.

Additional sub-questions can assess the spatial and thematic targeting of GA instruments, ensuring efficiency, avoiding duplication and scrutinising whether payment levels are appropriately calibrated to actual costs and environmental impacts.

Collectively, the sub-questions chosen to support this EQ contribute to a detailed framework for analysing whether the costs of the GA are justified by their outcomes and whether resources are allocated efficiently.

C4 Phase 2: Selecting indicators, data sources and methods

C4.1 Proposed indicators and data sources

As explained above, the only 'unknown' part in the efficiency analysis relates to the administrative costs, as both the effects (known from the effectiveness analysis) and the support payments (to be obtained from the PAs) are known. As such, the indicators proposed below capture administrative costs for both beneficiaries and administrations, the number of adopted simplification measures and indicators ensuring the proportionality of costs and benefits, aligned with environmental and climate benefits.

Proposals for indicators are listed in Table 25 below. These are indicative of the range of indicators which can be used to address various objectives of the efficiency analysis. Extensive ideas on efficiency indicators, including both cost-effectiveness and simplification indicators, as well as their data needs, possible data sources and procedures to estimate them, are included in previous publications of the EU CAP Network supported by the Evaluation Helpdesk [112]. Cost accounting, surveys and comparative analysis are recommended with data sourced from financial records, stakeholder feedback and CAP reports. Indicators require reliable data sources, which include financial records from PAs, farmers, administrative personnel and expert surveys, as well as focus groups, policy document analyses and historical CAP evaluations. These sources ensure that the indicators used in the assessment are evidence-based and reflect the diverse implementation and

112 The interested reader may consult the EH publications: (1) *EU level CAP evaluation framework*, especially Tables 7 and 8 containing indicators and data sources for cost-effectiveness and simplification correspondingly (https://eu-cap-network.ec.europa.eu/support/evaluation/evaluation-framework_en); (2) *Use of factors of success in evaluation*, especially Annex V (pp. 132-140) containing efficiency indicators, data sources and the procedures for calculating the main cost-effectiveness indicators (https://eu-cap-network.ec.europa.eu/publications/use-factors-success-evaluation_en). (3) *Tool 4.1- Examples of guiding questions for the appraisal of the measures planned to reduce the administrative burden on farmers and other beneficiaries of the CAP Strategic Plan* (https://eu-cap-network.ec.europa.eu/publications/tool-41-examples-guiding-questions-appraisal-measures-planned-reduce-administrative_en#section--resources).

interplay across GA interventions. The data can be collected through a combination of methodologies, including extensive literature reviews, case studies, focus groups, farmer interviews, desk research, interviews with PAs and others [113]. Box 6 below suggests the type of data to collect to create indicators of efficiency.

Box 6. Practical example of data needed for creating efficiency indicators

The study 'Analysis of administrative burden arising from the CAP' examines the costs and administrative burden, including the effectiveness and efficiency, of systems for managing and controlling a large share of CAP expenditure.

Data for efficiency and cost-effectiveness are collected through a mix of methodologies, including literature reviews, extensive case studies in 12 MS, interviews with farmers using a semi-structured questionnaire, validation surveys and the integration of existing data sources, such as the DG AGRI cost of controls survey. The case studies involved collecting detailed data on administrative costs and burdens from PAs, including interviews and gathering financial and operational data that were then used by the SCM.

Validation steps were used to ensure data robustness. To address challenges in data collection and heterogeneous responses, an additional validation and assessment of transferability check was integrated by validating draft findings and hypotheses based on a preliminary report. Key findings from farmers' interviews were also discussed with key stakeholders and experts to validate the data further.

Source: Ecorys (2018) [114]

Data gaps in efficiency analysis can impede the accurate estimation of administrative costs and cost-effectiveness. This can result in incomplete or biased conclusions, ultimately undermining the credibility of the findings. Missing or low-quality data may mask inefficiencies, misrepresent the relationship between costs and benefits, and limit the ability to benchmark or compare across regions. To address these gaps, evaluators should combine multiple data sources and employ mixed-methods approaches that include both quantitative and qualitative methods, such as surveys, administrative records and case studies. Additionally, applying triangulation with expert input and stakeholder validation can help reconcile inconsistencies and fill in missing information.

Table 25. Proposed indicators and data sources for efficiency

Proposed indicator	Data sources	Observations/comments
1. The cost of implementing the GA is the sum of the support, the adjustment, administrative and enforcement costs to the administration and the administrative costs to the beneficiaries: 1.1 Financial support paid to beneficiaries for GA. 1.2 Adjustment costs for the administration. 1.3 Administrative costs for the administration, including the temporal evolution and the various administrative issues of monitoring and control (including enforcement costs). 1.4 Administrative costs for beneficiaries to submit their support applications, implement the operations/commitments of GA and claim the GA support.	1.1 PA for support to beneficiaries and enforcement costs. 1.2 Case studies and interviews with the administration. 1.3 and 1.4 Administrative cost survey among beneficiaries, and, if possible, a temporal recording of costs [115].	1.1 The annual performance report provides this information. 1.2 Case studies or in-depth interviews can work together with the inspection of administrative files and other sources, revealing the administrative cost to adjust existing and set up new GA interventions. This may include IT infrastructure, software development, other initial investments, etc. 1.3 and 1.4 Administrative costs may include running and maintenance costs for the administration, including technical assistance for the management, monitoring and evaluation of compliance and GA interventions. Such costs may include software licences, subscriptions to databases, extra labour costs, or external services, etc. Administration and beneficiary surveys can be used to cover all measures, types and sizes of farms.

113 The most complete study on administrative cost for the administration and not only the beneficiaries remains the 2018 study on *Analysis of administrative burden arising from the CAP*. Annex I to this report provides a very good exposition of the standard data collection methodologies for identifying administrative costs and an explanation of the standard cost model (https://op.europa.eu/en/publication-detail/-/publication/dabd45ab-9baf-11e9-9d01-01aa75ed71a1).

114 See footnote 113.

115 A simple indicator for public and farmers' administrative costs could be whether the administrative burden in 2023-27 increased compared to 2014-22.

2. Number of proposed and introduced simplification measures. 2.1. Number and type of operations from the administration that experienced reduced costs due to digitalisation. 2.2. Number and type of operations from the beneficiary that experienced reduced costs due to digitalisation. 2.3. Number and type of audits and controls that were or can be simplified or automated, thereby reducing time and cost to the administration and beneficiaries.	2.1. Findings and recommendations for actual and possible simplification from surveys, interviews and analysis of administrative documents. 2.2. Same as 1.2 and 1.3 above, and a survey of administrative records and modifications. 2.3. Same as 2.2. above.	2. There are various ways to collect and present introduced simplification measures and proposals. The simplification study of the EU CAP Network supported by the Evaluation Helpdesk [116] categorises simplification suggestions from farmers and other beneficiaries into six main areas (such as reducing complexity, simplifying applications, streamlining reporting, etc.). It discusses how these correspond to the key burdens identified. 2.1, 2.2, and 2.3. The aim is to produce a list of implemented measures and proposed recommendations for simplifications, cost reductions or time savings, categorised in accordance with the interests of the study. Simplification measures must deliver the same standards of the intended outcome.
3. Proportionality of costs and non-monetised benefits. 3.1. Degree of cost alignment with short and long-term environmental and climate benefits. 3.2. Expected permanence of supported interventions and long-term behavioural changes.	3.1. Elite [117], in-depth interviews with experts, local stakeholders, and environmental NGOs. 3.2. Focus groups and multicriteria decision analysis.	3.1 and 3.2 Qualitative methods for consultation with experts and local stakeholders should ensure the collection of data for decision-making.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

The proposed indicators are unlikely to have been estimated in a GA context but may have been estimated in various related contexts at the EU or MS level. For example, the efficiency indicators calculated in the study presented in Box 7 focus on the relationship between costs incurred (set-up, running, management and control costs) and the outcomes achieved in terms of precise and reliable identification and control of agricultural parcels within the LPIS/IACS systems. The key efficiency indicators estimated using the data include 'Costs related to LPIS updating, such as acquisition of new imagery, photo-interpretation, updates following on-the-spot checks or farmers' requests', as well as 'Costs related to LPIS upgrading, which covers system adjustments to meet new regulatory requirements' and others. Additionally, the study examined administrative costs per hectare, personnel costs for various activities, and the distribution of costs across different CAP measures to understand efficiency drivers and cost-effectiveness. The proposed indicators reflect the range and type of indicators that can be estimated, reflecting the evaluation's main objectives and concerns.

116 See footnote 105 for the full simplification study (2025) reference.

117 Elite interviews are those directed at the elite, i.e. political leaders (e.g. ministers, MPs), senior executives (CEOs, directors), experts (academics, scientists, consultants), bureaucrats or high-ranking officials and influential civil society/NGO representatives.

Box 7. Practical example of indicators created for efficiency analysis

Among many efficiency indicators, the 'Evaluation study of the impact of the CAP on climate change and greenhouse gas emissions' estimated:

- Cost per tonne of CO_2 equivalent reduced: For instance, the greening payment in 2016, with an expenditure of around EUR 6.1 billion, was estimated to have secured a simulated 19.8 million tonnes (Mt) of CO_2 equivalent reduction, resulting in a cost of approximately EUR 278 per tonne of CO_2 eq.
- Administrative burden and simplification: The study assessed the administrative costs and burdens associated with climate-relevant CAP measures, particularly the greening measures. Implementation and running costs per hectare were estimated, with some simplification noted over time; however, administrative burdens, especially for smallholders, remained a concern.
- Prevention of deadweight and promotion of additionality: The analysis considered the extent to which MS had targeted measures effectively to avoid paying for actions that would have occurred anyway (deadweight) and to promote additionality. Deadweight and additionality were addressed qualitatively, with examples, risks and opportunities for better targeting and leveraging private finance identified, without relying on quantitative indicators or specific statistical measures.

Source: Alliance Environnement (2019) [118]

C4.2 Recommended methods

The presentation of methods is restricted to those used for estimating or calculating the cost-effectiveness and administrative burden from the GA, not methods for evaluating cost-effectiveness and simplification in general. The GA's structure and the interplay between mandatory conditionality requirements, voluntary eco-schemes, ENVCLIM and other interventions require a detailed understanding of administrative processes to assess efficiency. The methods should be able to identify redundancies and bottlenecks (if they exist), quantify the burden in terms of time and cost, engage stakeholders and ensure that simplification measures reflect the needs of farmers and administrators. Finally, they should support simplification by identifying opportunities to streamline processes, such as adopting digital tools or harmonising requirements.

As explained above, the unknown factor for estimating cost-effectiveness is the administrative costs. Thus, the focus here is on a range of methods used to estimate (calculate) administrative burden in the context of the CAP, which encompasses several well-established approaches. The list of methods below is indicative and by no means exclusive; however, it addresses a broad range of evaluation aims and data availability. The choice of method depends on the evaluation and data frameworks, as well as the resources devoted to evaluating efficiency.

When selecting among the methods outlined below, MAs and evaluators should first determine how well, precisely, and in what depth they wish to conduct an administrative cost survey and, consequently, a cost-effectiveness assessment. This decision should be guided by the criticality of such information and by the potential consequences the findings may have for policy design and implementation. Based on this initial judgement, they can opt for a 'minimum' approach, using simpler, less resource-intensive methods that provide indicative results with lower precision, or for a more 'advanced' approach, employing elaborate, data-intensive techniques capable of delivering higher accuracy and depth of analysis. This graduated approach allows administrations with limited resources to obtain valuable insights, while enabling those with greater capacity to invest in more robust, detailed assessments.

For example, a minimum approach might involve conducting a short, targeted survey of a representative sample of farmers and administrative staff, focusing on estimated time spent on key GA-related tasks and approximate out-of-pocket expenses (especially IT costs), combined with readily available payment data from the PA. This could be sufficient to produce indicative administrative cost estimates and a basic cost-effectiveness ratio. By contrast, an advanced approach could entail a full application of the standard cost model across multiple regions, complemented by process mapping, in-depth interviews, and triangulation with administrative records, enabling detailed breakdowns of costs by activity, type of stakeholder and intervention, as well as sensitivity analyses to test different cost scenarios.

Below, several possible and recommended methods are described. Thus, one or more of the following methods may be considered helpful for the assessment [119]:

- **Process mapping (flowcharting and diagramming)**: Is the creation of visual representations (e.g. flowcharts, process maps, or swimlane diagrams) of the administrative processes involved in GA's current implementation, such as support applications, compliance reporting, and certification processes. It identifies each step, stakeholder, and decision point to map the workflow for farmers applying for eco-schemes, ENVCLIM or other payments, including data submission, verification by PAs, and monitoring. It highlights key steps, such as form submission,

118 European Commission: Directorate-General for Agriculture and Rural Development and Alliance Environnement, *Evaluation study of the impact of the CAP on climate change and greenhouse gas emissions – Final report*, Publications Office, 2019, https://data.europa.eu/doi/10.2762/54044.
119 Ibid.

field inspections or digital reporting. Visual maps facilitate the identification of redundancies, bottlenecks, and overly complex steps that contribute to administrative burdens, aligning with an emphasis on simplification.

- **The standard cost model (SCM)**: The SCM quantifies the administrative burden by calculating the time and financial costs related to regulatory requirements. It breaks down the process into information obligations, activities, time spent, frequency and costs (including staff wages and service outsourcing). It can assess the costs for public authorities and beneficiaries (e.g. farmers).
- **Gold-plating analysis (GPA)**: This structural and qualitative method identifies MS policy implementation decisions that may unnecessarily increase administrative costs beyond EU requirements ('gold-plating'). It complements SCM by highlighting where national choices add to the burden. A recent EU CAP Network report examines the effects of gold-plating on the administrative burden for farmers [120].
- **Cumulative cost assessment (CCA)**: Examines the cumulative costs stemming from overlapping or multiple pieces of legislation/regulation, avoiding double-counting and allowing for the assessment of the joint impact of policy layers. It can be used to identify and, where possible, quantify the total regulatory costs affecting a sector and, in particular, the GA.
- **Survey-based and interview methods**: These methods support direct data collection from stakeholders (e.g. farmers, administration staff) regarding the time spent, financial outlay, and perceived burden. It is used to estimate internal (time and opportunity cost) and external (consultancy and services) costs, often triangulated with other sources for validation. Box 8 provides a recent example of the application of survey-based methods for the identification and measurement of administrative costs.
- **Case study analysis**: It engages in an in-depth analysis of administrative processes and costs in selected MS or regions, capturing contextual factors and different implementation models. It provides quantitative and qualitative insights, which are useful for extrapolating and understanding systemic differences.
- **Administrative data and cost structuring tables (CSTs)**: Utilise detailed administrative records, categorised by type of activity (e.g. IT investment, staff time, control checks), often organised in CSTs for systematic data capture and aggregation. It can support granular estimation and comparison across regions, countries and interventions.
- **Sensitivity analysis (SA)** is a key method to assess how administrative costs (for beneficiaries and authorities) affect results. Sensitivity analysis is recommended when administrative costs are a critical but uncertain factor in the cost-effectiveness model. The evaluator should pair it with real-world data validation (e.g. farmer interviews) to enhance credibility.

Table 26. Indicative methods, their advantages, disadvantages and recommended use

Method	Advantages	Disadvantages	When to use
Process mapping (flowcharting and diagramming).	Visual clarity, stakeholder engagement, cost tracking, and support for comparative analysis and mixed-methods research.	Time-consuming, requires detailed data collection (interviews, document reviews) to accurately map processes, risk of oversimplification, static snapshot and subjectivity in design.	When visualising inefficiencies in policy implementation, the study focuses on both farmer and institutional administrative burdens, and proposes process improvements (e.g. digitalisation, reduced paperwork).
The standard cost model (SCM).	Structured and transparent, it breaks costs into time, labour, and monetary inputs, making it replicable, applicable to multiple stakeholders, supports studies on policy reform, and is EU-endorsed (Tool 58 of Better Regulation).	Simplistic assumptions, data-intensive, static approach, limited to quantifiable costs, and potential bias.	When comparable, standardised cost metrics are needed, the focus is on administrative simplification (e.g. reducing farmer or administrative burden). Data on time/ labour costs are available (via surveys or expert estimates).

120 See footnote 105 for the full simplification study (2025) reference.

Gold-plating analysis (GPA).	Identifies over-regulation, improves cost-effectiveness, supports evidence-based reform and supports comparative analysis.	Subjectivity in defining 'gold-plating,' data challenges, political sensitivity and a narrow focus.	When suspect national rules exceed EU requirements unnecessarily, focus on simplifying policy implementation (e.g. CSPs). Stakeholders (farmers, agencies) complain about excessive bureaucracy.
Cumulative cost assessment (CCA).	Comprehensive cost capture, stakeholder-inclusive, policy optimisation, EU-endorsed methodology (Tool 57 of Better Regulation).	Data intensity, complexity in attribution, subjectivity in valuation and a static snapshot.	When the study focuses on administrative efficiency (e.g. CAP red tape), or there is a need to compare costs across different actors (farmers vs. agencies), as EU or national regulators require cumulative cost reporting.
Survey-based and interview methods.	Direct feedback – captures real-world experiences (e.g. time spent on paperwork, compliance difficulties), granular data that can differentiate costs by farm size, sector or region, and offers flexibility since surveys can quantify time/money costs. At the same time, interviews explore qualitative pain points and process insights that reveal inefficiencies in fund distribution, verification, or reporting, as well as hidden costs and uncover indirect burdens (e.g. IT system delays, staff training needs). Stakeholder perspectives are captured and reflected in interviews with officials who can explain policy implementation challenges.	Response bias because farmers may overstate burdens and officials may downplay inefficiencies, sampling issues when small farms or marginalised groups may be underrepresented, time-consuming because designing, distributing, and analysing surveys/interviews is labour-intensive and subjectivity because self-reported time/cost estimates may lack precision. Non-response bias, for example, busy stakeholders (e.g. large farmers, senior officials) may not participate, heterogeneity with often hard to standardise responses across regions/countries, dynamic changes in cases when administrative costs may shift post-policy reform, requiring follow-ups.	When one needs both quantitative and qualitative data, policy impacts are highly variable (e.g. differences between small/large farms) and stakeholder participation is crucial for reform (e.g. CSPs).
Case study analysis.	Rich, context-specific insights, holistic understanding, flexibility and stakeholder perspectives.	Limited generalisability, resource-intensive, subjectivity risks and difficulty in isolating policy effects from external factors (e.g. market changes, climate events).	Need to understand implementation challenges (e.g. administrative bottlenecks), policy is complex and context-dependent (e.g. CAP eco-schemes), and stakeholder narratives are crucial (e.g. farmers' frustrations with paperwork).

Administrative data and cost structuring tables (CSTs).	Standardisation, transparency and accountability, comprehensive cost capture and useful for cost-effectiveness analysis.	Data availability and quality, static snapshot, subjectivity in cost allocation and limited behavioural insights.	Need comparable, replicable cost data (e.g. EU-wide CAP analysis), focus is on administrative efficiency (e.g. reducing farmer paperwork) and policymakers demand hard metrics (e.g. cost per application processed).
Sensitivity analysis (SA).	Robustness check, risk assessment, transparency and flexibility.	Data demands, complexity and subjectivity. Does not reduce uncertainty; it only quantifies it.	To stress-test administrative cost assumptions, the study faces data gaps (e.g. uncertain farmer compliance times) and policymakers demand risk-aware recommendations.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Box 8. Example of survey-based methods for identifying and calculating administrative costs for the authorities.

A German study on 'Effectiveness and efficiency of EAFRD funding for resource conservation, climate protection, and animal welfare' provides a reasonably detailed explanation of how public administrative implementation costs were calculated, particularly for supporting cost-effectiveness analysis.

The study employed a questionnaire-based full survey conducted among the administrative authorities responsible for the RDP. This survey captured:

- the labour input required for implementing all support measures, and
- the programme overhead in the managing authority.

These physical measures were converted to monetary values using full-time equivalents (FTE) multiplied by personnel cost tables of the respective Länder to calculate the personnel component of the implementation cost. Additional material costs were added proportionately, including IT costs and costs for outsourcing tasks to third parties.

The study cross-checks the implementation cost values calculated by the survey with cost-performance accounting data from the administrative offices.

The resulting implementation cost values were then added to the direct payment costs (i.e. the subsidies themselves) to derive the total public costs per measure. These total costs were compared with the measured effects (e.g. kg of nitrogen (N) reduced, ha under biodiversity measure) to assess cost-effectiveness. The authors of the study caution that both cost and effect estimates are subject to uncertainty, so the efficiency values should be interpreted only in relative terms and not as absolute metrics.

Source: Pufahl, A. et al (2022) [121]

Regardless of the method chosen, **expert validation and triangulation** are recommended. This approach can utilise various techniques such as validation questionnaires and cross-verification with multiple data sources, including expert and stakeholder reviews, to ensure the reliability and accuracy of cost estimates. It is essential for reconciling differences and filling data gaps.

These methods offer a comprehensive approach to efficiency studies by identifying inefficiencies, quantifying burdens, proposing simplifications and developing actionable recommendations to streamline GA implementation, thereby improving efficiency for farmers and administrators while maintaining environmental and climate benefits. For a robust analysis, it is recommended to combine several of these methods. For example, to conduct an efficiency analysis, the evaluator may begin with process mapping and then utilise surveys and interviews to validate and enrich the map with stakeholder perspectives and the SCM or CCA models for the cost analysis. Box 9 provides an example of how various methods have been combined for efficiency analysis.

121 See footnote 69 for Pufahl et al. (2022).

Box 9. Practical example of a combination of methods used for assessing efficiency

A study on "Simplification and administrative burden" used multiple methods to evaluate administrative burden for farmers and other beneficiaries under the CAP. Some indicative techniques included:

- Targeted consultation (TC): A large-scale consultation conducted by the European Commission, open from 7 March to 8 April 2024, which collected information from about 27 000 farmers.
- In-depth Interviews: Approximately 300 interviews with farmers were conducted across the EU, selecting participants from the TC.
- Questionnaire-based Surveys: targeting different categories of CAP beneficiaries other than farmers, such as Local Action Groups (LAGs), Operational Groups of the EIP-AGRI, producer organisations in the fruit and vegetable sector, wine growers/producers, and advisory services.
- Interviews with MAs, PAs, and other stakeholders.
- Desk research and literature review.
- Analytical framework and standard cost model: To quantify the administrative burden, particularly for farmers, the study employed an analytical framework based on time spent on administrative tasks, lump-sum payments for external assistance, and farm-level labour costs from the FADN. The costs were estimated by multiplying the average time spent by the labour cost and adding external support costs.
- Triangulation of data: The study triangulated findings from the TC, interviews, surveys, and literature to ensure robustness and comprehensiveness of the assessment.

Source: European Commission (2025) [122]

The application of the methods depends on data availability and quality, and their success is often a matter of access to administrative databases and stakeholder cooperation. The choice of method is always the outcome of a process balancing evaluation resources against evaluation objectives and the availability of data and skills. As such, there is no 'golden rule' guiding the choice of methods and the appropriateness of the chosen methodology. However, some recommendations for 'good practice' include the use of a mix of quantitative and qualitative methods, the triangulation of data sources to ensure robustness and the involvement of stakeholders and experts in the interpretation and validation of the derived results, conclusions and recommendations.

An interesting perspective on cost-effectiveness is provided by calculating the 'relative implementation costs' defined as the ratio of administration implementation costs (ICs) for public authorities (excluding farmers) to public expenditure (ICs ÷ public expenditure). Public expenditures include EU co-financed and national funds spent on GA instruments, but exclude implementation costs. This ratio serves as an indicator of implementation efficiency. Fahrmann and Grajewski [123] found that measures achieving a higher impact level tend to have higher relative implementation costs, a result that is particularly true for area-based measures. They argue that policy simplification must balance cost reduction with effectiveness and "in no circumstances should low relative implementation costs be used to justify any ineffective programme measure".

C5 Phase 3: Analysis, outcome and recommendations

C5.1 Carrying out the analysis

The implementation phase is developed through evaluation steps aimed at assessing both the administrative burden and the cost-effectiveness of the GA.

Evaluation step 1 – Identification of key administrative processes

In this step, the efficiency evaluation maps the primary administrative requirements associated with the GA, including environmental management plans, organic farming certification, environmental monitoring, subsidy applications, environmental impact assessments and compliance reporting. This mapping of administrative processes may have been carried out, in part or in whole, in another study concerning the simplification of all CSP processes, not just GA.

Evaluation step 2 – An assessment of the current state of administrative processes

The evaluation gathers data through surveys, interviews, or focus groups with farmers and administrative personnel to understand the perceived complexity and time costs of these processes, enabling the development of the indicators proposed above. The administration may also have collected compliance and error rates in applications or processed delays to pinpoint inefficiencies or 'pain points'. This input may also come from the coherence analysis (See Annex B – Coherence).

122 See footnote 105 for the full Simplification study (2025) reference.
123 See footnote 70 for Farhmann and Grajewski (2013).

Evaluation step 3 – Evaluate the impacts of administrative burden on farmers and the administration.

In this step, the evaluation quantifies (if possible) the costs of administrative tasks, such as the hours spent on paperwork and consultants' fees. It then investigates how these burdens influence participation in the GA, such as lower enrolment in subsidy schemes or slower adoption of sustainable practices. This estimate can be used for benchmarking administrative efficiency against best practices brought to the attention of evaluators by stakeholders, historical trends mentioned by MA or PA personnel, or across different regions of the MS. An interesting comparison may be across different policy instruments (e.g. ENVCLIM vs. eco-schemes) without necessarily using a benchmark. Box 10 below shows the cost-effectiveness evaluation of various 2014–2020 RDP measures in Emilia Romagna, Italy.

Box 10. Example of comparison of cost-effectiveness across different agri-environmental-climate schemes designed to contribute to GHG reductions

Below is part of a table comparing the cost-effectiveness estimates of various actions within an agri-environment scheme under an RDP, in terms of GHG reductions in euros per tonne of reduced CO_2 equivalent. It shows cost-effectiveness ratios calculated by effectiveness (CO_2 reduced) in the denominator and support to farmers in the numerator. This cost-effectiveness ratio shows the cost in euros to reduce 1 tonne of CO_2e, or, in reverse, how much CO_2e is reduced per euro spent.

In the same way, an evaluation can add to the cost of support, the cost of administration and re-calculate the cost-effectiveness ratios and compare them among the activities of the same measure (intervention) or among interventions or even between the CSP and other programmes reducing GHG emissions or with a national benchmark, e.g. the cost of carbon at the national market.

Comparative cost-effectiveness calculations of selective agri-environmental and organic farming measures

Activity (M.10 and M.11)	Duration	Annual payments	Annual reduction in tonnes of CO_2e	Euro/t CO_2e
Integrated production	5	5 488 416	8 571	640
Manure management	5	293 678	613	479
Increase in the soil's organic substance	5	1 400 051	23 789	59
Conservation agriculture	6	187 369	3 574	52
Sustainable management of extensive grasslands	5	723 198	17 502	41
Set aside for 20 years	20	81 144	7 003	12
Organic farming conversion	5	2 634 528	10 021	262
Organic farming maintenance	5	5 433 502	10 021	542

Source: Regione Emilia Romagna, (2022) [124]

124 Servizio di Valutazione in Itinere, Iintermedia ed Ex-post del Programma di Sviluppo Rurale (PSR) della Regione Emilia Romagna 2014-2020.

Evaluation step 4 – The evaluators draw proposals or recommendations for simplification measures

In this step, the evaluation may offer practical solutions to streamline processes, including digitalisation, standardisation, reduced frequency of commitments and one-stop shops, among others. It should ensure that these proposals do not compromise the benefits or are not implemented at the expense of environmental outcomes and standards.

Evaluation step 5 – The evaluation analyses and possibly quantifies the potential benefits of simplification

The estimation of time and cost savings for farmers and administrators can support the evaluation of the benefits that would accrue if the simplification proposals were implemented. In a wider and rather "loose" perspective, an evaluator could also project or draw scenarios concerning the effects of simplification on boosting participation rates, improving compliance, and enhancing environmental outcomes.

Evaluation step 6 – The efficiency evaluation calculates the cost-effectiveness ratio of the GA

The evaluator can utilise information provided by: (i) the effectiveness evaluation; (ii) data on payments; and (iii) the administrative costs estimated in Step 3 to approximate the overall cost-effectiveness of GA. A further step would be to re-estimate the cost-effectiveness by conducting a sensitivity analysis based on plausible scenarios of the administrative costs from information derived in Steps 4 and 5.

Cost-effectiveness is not just a ratio. Its interpretation depends on the context, data quality and assumptions behind the calculation. When is a cost-effectiveness ratio 'good enough?' or when can high cost-effectiveness ratios be justified? To interpret and judge a cost-effectiveness ratio, one needs a rule of thumb, usually coming from a policy-relevant threshold or the market if the effect is marketed, e.g. carbon price. For example, a GA that achieves high cost-effectiveness ratios for GHG emissions reductions may be justified if it improves equity by supporting small farms or if extensive co-benefits for biodiversity and soil conservation exist. Interpretation of the cost-effectiveness ratio is very context dependent.

Even the way cost-effectiveness ratios are expressed, i.e. effect per unit of cost or cost per unit of effect, depends on how one frames the analysis, and both approaches are used. For example, it is advisable to use '€/tonnes of CO_2 eq.' (cost per physical unit of impact) when comparing against a threshold (e.g. the carbon price) or when prioritising budget constraints (e.g. CAP eco-schemes targeting GHG emission reductions must stay under EUR 500/ha). Alternatively, use 'tonnes of CO_2 eq./€' (effect per cost) when communicating public value (e.g. 'every €1M spent reduces ammonia by X tonnes') or when considering maximising scalability, such as which policy delivers the most carbon sequestrated (impact) per euro?

The methods available for the steps outlined above are presented in Annex C4.2 Recommended methods.

C5.2 Examples of types of outcomes and recommendations

An efficiency analysis provides both quantitative metrics – such as cost-effectiveness benchmarks and the financial impact of potential simplifications – and qualitative insights into administrative bottlenecks and their effects on participation. Strategically, it reveals the trade-offs in GA design, ensuring funds target genuine additional benefits for the most significant environmental impact.

The CAP's efficiency analysis provides actionable recommendations to improve cost-effectiveness while safeguarding environmental outcomes. Key proposals include administrative simplifications, such as digital platforms and streamlined reporting; targeted improvements, such as spatial focus and adjusted payments; and established efficiency indicators for monitoring. These findings justify reforms, defend program design and secure budgets, ensuring complexity is retained only where necessary for environmental integrity (see table below).

Table 27. Indicative examples moving from efficiency analysis findings to evaluation recommendations and consequent possible actions.

EQ	Typical efficiency analysis finding	Recommendation from evaluator	Example of MA/PA action/use
EQ6 **Administrative burden**	**Analysis reveals high administrative costs for a specific measure** – Farmers spend an average of €YY/year on paperwork; uptake 25% below the target.	Digitalise application and verification; introduce pre-filled forms using LPIS data; enable e-signatures.	Launch an online portal with pre-filled farmer data; train PA staff; integrate with LPIS. Monitor uptake change over the next two years.
	Duplication of reporting – Farmers submit almost identical data to MA and the regional environmental agency.	Streamline reporting with a one-stop submission system; harmonise data requirements.	Negotiate inter-agency data-sharing, modify the legal framework, and develop a joint reporting portal.
	Low uptake of high-impact schemes (€XX/t CO_2e) due to complex eligibility rules.	Simplify eligibility; offer 'menu approach' with baseline + optional add-ons; provide advisory support.	Redesign scheme for subsequent CSP amendment; conduct farmer workshops; track uptake and cost-effectiveness annually.
	Administrative burden deters small farms – Significantly lower participation in voluntary schemes.	Offer simplified 'light' application track for holdings <10 ha; increase outreach via cooperatives.	Pilot simplified track in two regions; monitor participation change; consider scaling.
	National building permit rules impose excess requirements, adding cost without extra benefit.	Remove non-essential national requirements; align with EU minimums.	Review and amend national regulations; communicate changes to farmers; measure cost savings.
	Digitalisation measures reduced admin time by YY% in the pilot region.	Scale up successful digitalisation measures nationwide; apply lessons to other interventions.	Secure funding for the IT rollout; set national targets for reducing admin time; train staff.
EQ6 and EQ7	**Payments cost €XX per ton CO_2e reduced, exceeding the national carbon price benchmark, partly due to frequent and costly inspections.**	Use remote sensing for monitoring; reduce physical inspections from annually to once every three years; merge conversion and maintenance schemes.	Amend CSP to permit remote sensing; adjust control plan; reallocate €XMio/ year saved to higher-performing biodiversity measures.
EQ7 – Cost effectiveness	**Implementation cost ratio (IC ÷ public expenditure) >10% for bundles of specific interventions.**	Investigate causes; consider merging low-efficiency measures; reallocate funds to high-impact areas.	Commission targeted review; remove/merge underperforming measures in the next CSP revision.

Source: EU CAP Network supported by the European Evaluation Helpdesk for the CAP (2025)

Annex D – Bibliography

1. Angileri, V., Guerrero, I., Weiss, F., *A classification scheme based on farming practices*, Publications Office of the European Union, Luxembourg, 2024. https://dx.doi.org/10.2760/33560.

2. Barreiro-Hurle, J. et al., *Willing or complying? The delicate interplay between voluntary and mandatory interventions to promote farmers' environmental behavior*, Food Policy, 120, 2023. https://doi.org/10.1016/j.foodpol.2023.102481.

3. Brutti, Z., Freo, M., *Evaluating the CAP Greening crop diversification measure with counterfactual methods*, Publications Office of the European Union, Luxembourg, 2025. https://dx.doi.org/10.2760/6585881.

4. Cisilino, F., Bodini, A., Zanoli, A., *Rural development programs' impact on environment: an ex-post evaluation of organic farming*, Land Use Policy, 85, 2019, pp. 454-462. https://doi.org/10.1016/j.landusepol.2019.04.016.

5. Diop, T. B., Védrine, L., *Did crop diversity criterion from CAP green payments affect both economic and environmental farm performances?*, Ecological Economics, 227, 2025. https://doi.org/10.1016/j.ecolecon.2024.108405.

6. European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Addressing data gaps to evaluate CAP Strategic Plans. Report of the Good Practice Workshop, 8–9 June 2023, Malmö, Sweden*, Brussels, 2023. Available at: https://eu-cap-network.ec.europa.eu/publications/addressing-data-gaps-evaluate-cap-strategic-plans_en.

7. European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Labelling of interventions in CAP Strategic Plans by farming practices – Purpose and approach*, Brussels, 2024. https://eu-cap-network.ec.europa.eu/publications/labelling-interventions-cap-strategic-plans-farm-practices_en.

8. European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Synthesis of ex ante evaluations of CAP post 2020*, Brussels, 2023. https://eu-cap-network.ec.europa.eu/publications/synthesis-ex-ante-evaluations-cap-post-2020_en.

9. European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Use of factors of success in evaluation*, Brussels, 2023. https://eu-cap-network.ec.europa.eu/publications/use-factors-success-evaluation_en.

10. European Commission, Directorate-General for Agriculture and Rural Development – Unit C.4, *Updated fiches for Complementary Result Indicators No 13, 14, 15, 18 and 19 – Working Package 2*, Brussels, 2020. Available at: https://eu-cap-network.ec.europa.eu/publications/working-package-2-working-document-updated-fiches-complementary-result-indicators-no_en.

11. European Commission, Directorate-General for Agriculture and Rural Development – Unit C.4, *Guidelines: Assessing RDP achievements and impacts in 2019 (Part I-IV)*, Brussels, 2018. https://eu-cap-network.ec.europa.eu/publications/assessing-rdp-achievements-and-impacts-2019_en.

12. European Commission, Directorate-General for Agriculture and Rural Development – Unit D.1, *Analytical work: The CAP's GA designing green strategies. An analysis of different approaches in selected EU Member States*, Brussels, 2024. https://eu-cap-network.ec.europa.eu/publications/analytical-work-caps-green-architecture-designing-green-strategies_en.

13. European Commission, Directorate-General for Agriculture and Rural Development, Chartier, O., Krüger, T., Folkeson Lillo, C., Valli, C. et al., *Mapping and analysis of CAP strategic plans – Assessment of joint efforts for 2023–2027*, Publications Office of the European Union, Brussels, 2023. https://op.europa.eu/en/publication-detail/-/publication/80d12120-89bc-11ee-99ba-01aa75ed71a1/language-en.

14. European Commission: Directorate-General for Agriculture and Rural Development – Unit A.3, *Rough estimates of the climate change mitigation potential of the CAP Strategic Plans (EU-18) over the 2023–2027 period – Summary report for 19 CAP Strategic Plans*, Brussels, 2024. https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cmef/sustainability/climate-change-mitigation-potential-csp-eu-18-2023-27_en.

15. European Commission: Directorate-General for Agriculture and Rural Development – Unit A.3, *Study on simplification and administrative burden for farmers and other beneficiaries under the CAP*, Brussels, 2025. https://eu-cap-network.ec.europa.eu/publications/study-simplification-and-administrative-burden-farmers-and-other-beneficiaries-under_en.

16. European Commission: Directorate-General for Agriculture and Rural Development and Alliance Environnement, *Evaluation study of the impact of the CAP on climate change and greenhouse gas emissions – Final report*, Publications Office, 2019. https://data.europa.eu/doi/10.2762/54044.

17. European Commission: Directorate-General for Agriculture and Rural Development and ECORYS, *Analysis of administrative burden arising from the CAP – Final report*, Publications Office, 2019. https://data.europa.eu/doi/10.2762/521652.

18. European Commission Joint Research Centre, *A classification scheme based on farming practices*, Publications Office of the European Union, 2024. https://data.europa.eu/doi/10.2760/33560.

19. European Commission, Joint Research Centre, *The JRC farming practices evidence library*, Publications Office of the European Union, 2025. https://data.europa.eu/doi/10.2760/9473570.

20. European Court of Auditors, *Special report 20/2024: Common Agricultural Policy Plans – Greener, but not matching the EU's ambitions for the climate and the environment*, Luxembourg, 2024. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202405766.

21. Fahrmann, B., Grajewski, R., *How expensive is the implementation of rural development programmes?*, European Review of Agricultural Economics, 40(4), 2013, pp. 541–572. https://doi.org/10.1093/erae/jbs045.

22. Fellmann, T., Tassinari, G., Lasarte Lopez, J., Rey Vicario, D., Beber, C. et al., *Scenar 2040 – A scenario study on the Common Agricultural Policy*, Publications Office of the European Union, Luxembourg, 2025. https://doi.org/10.2760/7381366.

23. Petsakos, A. et al., *Farm-level impacts of the CAP post-2020 reform: A scenario-based analysis*, Applied Economic Perspectives and Policy, 45(2), 2023, 1178. https://dx.doi.org/10.1002/aepp.13257.

24. Pufahl, A., Schwarze, S., Roggendorf, W., Sander, A., Bathke, M., Bergschmidt, A., *Wirksamkeit und Effizienz der ELER Förderung für Ressourcenschutz, Klimaschutz und Tierwohl*, 2022. https://doi.org/10.12767/buel.v100i1.395.a

25. Röder, N., Krämer, C., Grajewski, R., Lakner, S., Matthews, A., *What is the environmental potential of the post-2022 Common Agricultural Policy?*, *Land Use Policy*, 144, 2024, 107219. https://doi.org/10.1016/j.landusepol.2024.107219.

26. Servizio di Valutazione in Itinere, Iintermedia ed Ex-post del Programma di Sviluppo Rurale (PSR) della Regione Emilia Romagna 2014-2020.

27. Vergamini, D. et al., *Simulating policy mixes to reduce soil erosion and land abandonment in marginal areas: A case study from the Liguria Region (Italy)*, *Land Use Policy*, 143, 2024, 107188. https://doi.org/10.1016/j.landusepol.2024.107188.

EU Regulations

- Commission Implementing Regulation (EU) 2022/1475 of 6 September 2022 laying down detailed rules for implementation of Regulation (EU) 2021/2115 of the European Parliament and of the Council as regards the evaluation of the CAP Strategic Plans and the provision of information for monitoring and evaluation. https://eur-lex.europa.eu/eli/reg_impl/2022/1475/oj/eng.
- Directive 91/676/EEC of 12 December 1991 concerning the protection of waters against pollution caused by nitrates from agricultural sources (Nitrates Directive). https://eur-lex.europa.eu/eli/dir/1991/676/oj/eng.
- Directive 2007/2/EC of the European Parliament and of the Council of 14 March 2007 establishing an Infrastructure for Spatial Information in the European Community (INSPIRE). https://eur-lex.europa.eu/eli/dir/2007/2/oj/eng.
- Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013. https://eur-lex.europa.eu/eli/reg/2021/2115/oj/eng.

Supporting literature

This annex also presents a comprehensive list of supporting literature consulted during the running of Thematic Working Group 10 (TWG-10). The overarching objective of TWG-10 is to foster a shared understanding of how to evaluate the environment and climate architecture of the CAP Strategic Plans. The supporting literature included in this annex supports this aim by providing relevant academic and grey literature, existing evaluation frameworks, and methodological approaches that inform the design and assessment of environmental and climate-related interventions within the CAP.

1. Alliance Environnement, *Impact of the CAP on habitats, landscapes, biodiversity*, Directorate-General for Agriculture and Rural Development – Directorate C, Brussels, 2019. Available at: https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cmef/sustainability/impact-cap-habitats-landscapes-biodiversity_en.

2. BirdLife International, NABU, *The untapped potential of eco-schemes: An analysis of the use of eco-schemes across 12 countries and their impact on biodiversity*, 2024. https://www.birdlife.org/news/2025/02/05/new-report-member-states-fail-to-make-eu-agriculture-more-sustainable/.

3. Bundesministeriums für Landwirtschaft, Ernährung und Heimat (BMLEH), *Überprüfung und Evaluierung der Instrumente zur Förderung von Umwelt*, Klima und Tierwohl, 2025. https://www.bmleh.de/SharedDocs/Downloads/DE/Broschueren/evaluierung-oeko-regelungen.html.

4. European Commission, *Better regulation guidelines and toolbox*, 2023. Available at: https://commission.europa.eu/law/law-making-process/better-regulation/better-regulation-guidelines-and-toolbox_en.

5. European Commission, *Commission Notice: Guidelines on a framework for developing methodologies to monitor high-diversity landscape features pursuant to Article 14(7) of the Nature Restoration Regulation (Regulation (EU) 2024/1991)*, Brussels, February 2025. http://data.europa.eu/eli/C/2025/980/oj.

6. European Commission, *Commission staff working document – Analysis of links between CAP Reform and the Green Deal*, Brussels, 2020. https://agriculture.ec.europa.eu/media/news/cap-reforms-compatibility-green-deals-ambition-2020-05-20_en.

7. European Commission, *Commission staff working document – Evaluation of the impact of the Common Agricultural Policy on climate change and greenhouse gas emissions*, Brussels, 2021. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021SC0115.

8. European Commission, *Directorate-General for Agriculture and Rural Development – Unit A.3, CAP Evaluation Insights: climate change*, Brussels, 2024. https://eu-cap-network.ec.europa.eu/publications/cap-evaluation-insights-climate-change_en.

9. European Commission, Directorate-General for Agriculture and Rural Development, *Catalogue of CAP interventions*. Available at: https://agridata.ec.europa.eu/extensions/DashboardCapPlan/catalogue_interventions.html.

10. European Commission, Directorate-General for Agriculture and Rural Development and Alliance Environnement, *Evaluation support study on the impact of the CAP on sustainable management of the soil – Final report*, Publications Office of the European Union, 2021. https://data.europa.eu/doi/10.2762/799605.

11. European Commission, Directorate-General for Agriculture and Rural Development, EEIG Alliance Environnement, Schwaiger, E., Pierrepont, A. d., Rosell, J. et al., *Evaluation of the impact of the CAP on water – Final report*, Publications Office of the European Union, 2020. https://data.europa.eu/doi/10.2762/63371.

12. European Commission, Directorate-General for Agriculture and Rural Development – Unit A.3, *Assessment of result-based interventions – Thematic report*, Brussels, 2024. https://eu-cap-network.ec.europa.eu/publications/assessment-results-based-interventions_en.

13. European Commission, Directorate-General for Agriculture and Rural Development – Unit C.4, *Synthesis of the evaluation components of the enhanced AIR 2019: Chapter 7 – Summary report*, Brussels, 2019. https://eu-cap-network.ec.europa.eu/publications/summary-report-synthesis-evaluation-components-enhanced-airs-2019-chapter-7_en.

14. European Commission, Directorate-General for Environment and Sundseth, K., *The nature restoration regulation*, Publications Office of the European Union, 2025. https://data.europa.eu/doi/10.2779/5842922.

15. European Commission, Joint Research Centre, Marelli, L. et al., *Delivering the EU Green Deal – Progress towards targets*, Black, C. and Cisternino, S. (eds), Publications Office of the European Union, Luxembourg, 2025. https://data.europa.eu/doi/10.2760/8188748.

16. European Commission, Joint Research Centre, Rommel, J., Barreiro-Hurlé, J., Thomas, F., Rodríguez-Entrena, M. et al., *Farmers and the new GA of the EU Common Agricultural Policy – A behavioural experiment*, Publications Office of the European Union, 2021. https://data.europa.eu/doi/10.2760/718383.

17. European Court of Auditors, *Special report 21/2017: Greening – A more complex income support scheme, not yet environmentally effective*, Luxembourg, 2017. https://www.eca.europa.eu/en/publications?did=44179.

18. FoodDrinkEurope, Whittow, M., Ranalli, G., Davis, S., Noon, L., *Funding the EU transition to more sustainable agriculture – Discussion paper*, 2023. https://www.fooddrinkeurope.eu/resource/funding-the-eu-transition-to-more-sustainable-agriculture/.

19. Gocht, A., Ciaian, P., Bielza Diaz-Caneja, M., Terres, J., Röder, N., Himics, M., Salputra, G., *EU-wide economic and environmental impacts of CAP greening with high spatial and farm-type detail*, Journal of Agricultural Economics, 68(3), 2017, pp. 651–681. https://doi.org/10.1111/1477-9552.12217.

20. Guerrero, I., Bielza Diaz-Caneja, M., Angileri, V., Assouline, M., Bosco, S. et al., Quantifying the impact of sustainable farming practices on environment and climate, Publications Office of the European Union, Luxembourg, 2024. https://data.europa.eu/doi/10.2760/20814.

21. Lampkin, N., Stolze, M., Meredith, S., de Porras, M., Haller, L., Mészáros, D., IFOAM EU, FiBL and IEEP, *Using eco-schemes in the new CAP: A guide for managing authorities*, Brussels, 2020. https://orgprints.org/id/eprint/37227/.

22. N2K Group, European Economic Interest Group, *Analysis of the CAP Strategic Plans in 10 Member States and their contribution to the conservation of farmland birds*, Brussels, 2023. https://circabc.europa.eu/ui/group/e21159fc-a026-4045-a47f-9ff1a319e1c5/library/d418146e-49a8-46bf-a2a4-78d445481efa/details.

23. Navarro, A., López-Bao, J. V., *EU agricultural policy still not green*, Nature Sustainability, 2(11), 2019, pp. 990–990. https://doi.org/10.1038/s41893-019-0424-x.

24. Pe'er, G., Zinngrebe, Y., Moreira, F., Sirami, C., Schindler, S. et al., *A greener path for the EU Common Agricultural Policy*, Science, 365(6452), 2019, pp. 449–451. https://doi.org/10.1126/science.aax3146.

25. Runge, T. et al., *Eco-schemes: A core element of the new GA of the CAP – What can farmers and nature get out of it? Insights from 15 countries, EFFECT and CONSOLE projects*, 2021. https://project-effect.eu/wp-content/uploads/2021/12/Eco-schemes-in-15-countries_CONSOLE-and-EFFECT.pdf.

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