



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL FOR AGRICULTURE AND RURAL DEVELOPMENT

The Director-General

Brussels, 27.03.2017  
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Dear Mr Møller,

I am writing in response to your letter of 9 January 2017 to Commissioner Hogan, in which you share the Collective Impact Steering Committee's views on the recent amendments to the greening elements of Delegated Regulation (EU) No 639/2014 (currently under the scrutiny of the European Parliament and the Council). In particular, your organisation supports the merging of some landscape features and simplifying rules relating to these EFA types. In general, you underline, that the simplification proposed strengthens the bond between nature and agriculture.

I am pleased to learn that you consider these amendments as positive. Indeed, besides facilitating the implementation of rules for farmers and administrations, they aim to increase the environmental effectiveness of the greening scheme. Among others, the revised rules should encourage the uptake by farmers of the more environmentally beneficial EFA types such as landscape features.

You also call for additional simplification of the requirements for drafting electronic forms and maps indicating the location of land eligible for subsidies since they represent a burden for the administration. Specifically, you mention that national administrations have to enter all landscape features in the electronic maps in advance. You propose that this could be done by farmers.

In this regard, if a Member State decides to consider landscape features as EFA, it is indeed required to ensure that information on the location and size of landscape features is contained in the so-called EFA layer, a reference layer in the national system for identification of agricultural parcels that accommodates the elements that the Member State has decided to consider as EFA (c.f. Article 70 of Regulation (EU) No 1306/2013 and Article 5 of Regulation (EU) No 640/2014).

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In order to help farmers as much as possible to correctly declare their EFAs, the services of DG AGRI have recommended to the Member States to include in the EFA layer all potential EFA elements, in this case landscape features. However, acknowledging the burdens for administrations, DG AGRI has also indicated that, as a minimum, the EFA layer has to include, after verification by the administration and before executing the payment to farmers, at least the EFAs declared by the beneficiaries.

Yours sincerely,



Jerzy PLEWA