



Reply to the Commission's Observation Letter on the proposal of the Republic of Slovenia for the CAP strategic plan 2023-2027

Dear Mr. Commissioner, dear Janusz,

Slovenia wishes to thank the Commission for the observations on the proposal by the Republic of Slovenia for a CAP Strategic Plan 2023-2027 - CCI: 2023SI06AFSP001 (Ares (2022) 2417543 - 31/03/2022) and for the support provided during the structured dialogue so far.

Firstly, Slovenia would like to highlight that all stakeholders have been involved in preparing the CAP strategic plan. Thorough discussions during the public consultations have resulted in a balanced proposal of the CAP strategic plan, which emphasizes the ambition to address the objectives of the CAP reform and, at the same time, takes into account national specifics.

In the introductory part of the letter, the Commission points out that, in the light of the Russian invasion of Ukraine and the generalised commodity price surge and climate and environmental challenges, Member States should review their strategic plans in order to strengthen the EU's agricultural sector resilience, reduce dependency on synthetic fertilizers and scale up the production of renewable energy and transform production capacities in accordance with more sustainable production methods. Already during the preparation of the strategic plan, Slovenia placed special emphasis on the general objective of the CAP to promote a smart, competitive, resilient and diverse agricultural sector in order to ensure food security. We agree that more attention should be paid to the challenge of dependence on the import of synthetic fertilizers; therefore, Slovenia will cover this aspect in the implementation part of the strategic plan.

Slovenia is pleased that the Commission recognizes our efforts to strengthen agricultural supply chains, to promote producer cooperation in the agricultural sectors and the participation of producers in quality schemes, as well as to develop organic farming. Slovenia is also pleased that the Commission considers that the strategic plan shows the potential to contribute effectively to the general objective of fostering a smart, competitive, resilient and diversified agricultural sector, and that it welcomes the effort made in relation to young farmers and animal welfare.

However, Slovenia notes in all seriousness the Commission's critical observations regarding the contribution of the CAP strategic plan to the EU environmental and climate objectives and hence its standpoint that a higher overall ambition level is needed. In the process of planning, Slovenia put all efforts to enhance the current level of ambitions and is therefore convinced

that the strategic plan will bring positive changes. Compared to the current measures and funding under both CAP pillars, the funds will be increased, new interventions will be introduced under both pillars and the mandatory requirements under the conditionality will be more demanding. Slovenia is nevertheless aware that certain elements of the intervention logic, clearer goals and more targeted interventions are needed in order to reach the overall results of the strategic plan.

It is our opinion that the Commission, in its assessment, partially neglected certain important specifics of Slovenian agriculture, such as the small scattered land structure, predominantly difficult natural and topographic conditions and a proportionately high share of preserved natural eco-systems. Slovenia is facing a crucial breaking point of how to provide sustainable development, i.e. to preserve the environment, achieve climate goals, increase productivity, and maintain vital rural areas. This primary goal is in the focus of the strategic plan. Given that Slovenia is still a biodiversity “hotspot” of Europe, the CAP strategic plan strives for preserving and, where necessary, improving the biodiversity, but without hindering the much needed development of agriculture, without endangering food production in Slovenia and, at the same time, preserving the potential of agricultural land. Our goal is sustainable agriculture, which should enable the survival of agricultural holdings. At this moment, we cannot allow to slide into uncontrolled extensification and the loss of production potential.

Concerning the elements of the green architecture, the Commission is rather critical about conditionality. Our starting point was that necessary steps for achieving environmental and nature conservation goals were made and that flexibilities when setting the requirements are justified, including the use of the threshold of 10 ha. Furthermore, Member States may aim at a higher overall ambition by focusing on interventions under both pillars. In relation to crop rotation and the threshold under GAEC 7, a relatively high number of agricultural holdings and highly fragmented agricultural parcels in Slovenia indicate that smaller farmers already apply crop rotation and crop diversification annually and per agricultural parcel. Smaller farmers, as a rule, are producing for own production and hence cultivate different crops in the same year. In relation to GAEC 8 for maintenance of non-productive features and area, it is worth mentioning that the threshold of 10 ha is a step forward compared to the current threshold of 15 ha. Due to the current situation, it would even be appropriate to consider raising the threshold.

Regarding GAEC 9, Slovenia is committed to protect environmentally sensitive permanent grasslands in Natura 2000 sites. However, it is our opinion that, taking into account all the elements of sustainability, it is irrational to designate all permanent grasslands in Natura 2000 areas as environmentally sensitive. Namely, the share of Natura 2000 areas in Slovenia is high (23 % of agricultural areas), while the share of arable agricultural areas per capita is among the smallest in the EU. The Slovenian public opinion and agricultural stakeholders are sensitive towards the questions of local food security, which is even more evident due to the Ukrainian war. It is therefore our belief that, in those circumstances, it is not appropriate to expand the existing layers of environmentally sensitive permanent grassland (almost 30% of grasslands in Natura 2000 areas).

As regards Natura 2000 areas, Slovenia believes that non-mandatory interventions are the most appropriate for biodiversity and that our approach to gradually start implementing Natura

2000 payments on most critical areas is reasonable. We believe that this is an important step forward, which we will be able to strengthen in the following programming periods.

The Commission also requests to improve in the strategic plan some eco-schemes and revise the levels of payments of some interventions. When defining the eco-schemes, our aim has been to offer to farmers generally accessible and simple schemes without excessive administrative burden. We assessed that this is appropriate in view of the structure of agriculture in Slovenia. During the negotiations on the CAP reform, we understood that the legal framework allows the eco-schemes to be set up to maintain the current favourable situation. With the proposed measures, we would like to cover a significant share of agricultural land and keep it in an environmentally and nature-friendly condition, while maintaining and sustainably developing the mosaic landscape of Slovenian countryside, which is a source of biodiversity and contributes significantly to ecosystem services.

One of the most exposed and frequently mentioned comments refers to the climate component of the strategic plan. After carefully examining the comments of the Commission and all binding documents in the field of climate and energy, Slovenia agrees that the strategic plan should be further strengthened in the direction of reducing GHG and ammonia. Our aim is to improve the SWOT analysis and intervention logic and to upgrade the content of the measures in the direction of e.g. a more targeted support, more detailed and elaborated eligibility conditions/restrictions for obtaining funds (e.g. in the field of manure storage facilities, for building/rebuilding of stables, energy production from RES, energy efficiency, etc.), more efficient nitrogen management and the promotion of crop production in lowland areas. We believe that the strategic plan already contains a number of instruments that lead in this direction (with eco-schemes, AECM, animal welfare and investment support as well as knowledge transfer and advisory measures), but that it makes sense to further tighten these measures, interlink them and strengthen in substance.

Compared to the measures of Pillar I and II in the current programming period, the strategic plan largely addresses the issue of climate change in agriculture, which is reflected in eco-schemes, agri-environmental and climate-related measures (AECC) and also in certain investment supports. Please note that this national target takes into account the relatively small share of agricultural land in Slovenia and the potential implications for food security.

With regard to the contribution to and consistency with Green Deal targets, Slovenia fully understands the urgency of the targets and also the process that the Commission is obligated to do in order to assess the effort and ambition of Member States to address the overall ambition. Slovenia wishes to reassure the Commission that the objectives of the Green Deal have been taken into account when designing different interventions under the green architecture. For example, banning or limiting the use of fertilisers and plant protection products as well as encouraging the use of alternative plant protection methods. However, the necessity of access to alternative products for assuring plant health (on Slovenian market) is not to be neglected and all care must be directed towards maintaining the competitiveness of Slovenian agriculture. National values for all Green Deal targets are not defined in the CAP strategic plan, because this is not mandatory and, above all, it is difficult to set these targets properly at this stage. Nevertheless, appropriate steps in that direction will be made.

With regard to the Commission's comments on the redistribution strategy, Slovenia remains confident that the use of derogation is justified and hence further clarifications, including data, will be provided.

In relation to fast broadband in rural areas, Slovenia is aware that it is one of the basic preconditions for the development of the countryside. Based on the experience of the implementation of broadband internet support and the agreement between the relevant ministries, Slovenia has decided to fully finance broadband support under cohesion policy on the basis of the Partnership Agreement for the 2021-2027 programming period and the Recovery and Resilience Plan. This should ensure 100 % coverage of the Slovenian countryside with broadband connections. We believe that such an approach is fully in line with the EU's Long-Term Vision for Rural Areas and Commission's recommendations to fully harness the potential of all the EU funds available. In line with subsidiarity, Slovenia decided to go in the direction that broadband in rural areas will be financed from other EU funds and asks the Commission for consistency when considering and approving various strategic and program documents for Slovenia.

We are convinced that, with the proposed structure and approach of the strategic plan, we have taken an important step towards achieving the CAP goals and that no major intervention in the structure of the strategic plan or in the relationship between interventions is required. We would like to emphasize that, in drawing up the plan, a fundamental consensus has been reached between the key stakeholders and it would not make sense to endanger this balance more radically than strictly necessary. However, we will try to follow the Commission's recommendations and, with all sensitivity but also precision, improve certain elements, including in response to the Ukrainian crisis, which has highlighted the strategic role of EU agriculture for food security. To the greatest extent possible, we will provide additional or better explanations and data.

Finally, we would like to thank the Commission for its readiness to address outstanding issues in the technical meetings in the coming weeks and months, with a view to receive Commission's approval of the strategic plan as soon as possible. We will also send additional explanations and information of key importance for further cooperation.

We would again like to ask the Commission to take into account the specifics of Slovenia when assessing the strategic plan.

Dr. Jože Podgoršek
minister



Odgovor na dopis Komisije s pripombami na predlog Republike Slovenije za Strateški načrt SKP 2023-2027

Spoštovani g. komisar dragi Janusz,

Slovenija se zahvaljuje Komisiji za pripombe na predlog Strateškega načrta SKP 2023-2027 za Republiko Slovenijo - CCI: 2023SI06AFSP001 (Ares (2022) 2417543 - 31/03/2022) in za pomoč, ki jo je nudila do sedaj tekom strukturiranega dialoga.

Najprej bi Slovenija želela izpostaviti, da so bili v pripravo Strateškega načrta SKP 2023-2027 za Republiko Slovenijo (v nadaljnjem besedilu: Strateški načrt) vključeni tudi številni deležniki. Rezultat poglobljenih razprav v okviru javne obravnave je uravnotežen predlog strateškega načrta, v katerem je poudarjena ambicija, da naslovimo cilje reforme SKP in hkrati upoštevamo nacionalne posebnosti.

Komisija v uvodnem delu dopisa izpostavi, da bi v luči ruske invazije na Ukrajino in splošnega naraščanja cen proizvodov ter izzivov na področju podnebja in okolja države članice morale pregledati Strateške načrte, z namenom, da bi izkoristile možnosti za krepitev odpornosti kmetijskega sektorja EU, za zmanjšanje odvisnosti od umetnih gnojil in povečanje proizvodnje energije iz obnovljivih virov ter za preobrazbo proizvodnih kapacitet v skladu z bolj trajnostnimi metodami pridelave. Že med samo pripravo Strateškega načrta je Slovenija dala poseben poudarek splošnemu cilju SKP za spodbujanje pametnega, konkurenčnega, odpornega in raznolikega kmetijskega sektorja zaradi zagotavljanja prehranske varnosti. Strinjamo se, da je več pozornosti treba nameniti izzivu odvisnosti od uvoza umetnih gnojil, zato bo Slovenija ta vidik naslovila v izvedbenem delu Strateškega načrta.

Slovenija je zadovoljna, da Komisija priznava naše napore za krepitev kmetijskih oskrbnih poti, za promocijo sodelovanja proizvajalcev v kmetijskem sektorju in vključenosti proizvajalcev v shemah kakovosti in za razvoj ekološkega kmetijstva. Prav tako je Slovenija zadovoljna, da je Komisija mnenja, da Strateški načrt kaže potencial za učinkovit prispevek k splošnemu cilju za spodbujanje pametnega, konkurenčnega, odpornega in raznolikega kmetijskega sektorja, ter da pozdravlja napore glede mladih kmetov in dobrobiti živali.

Z vso resnostjo ugotavljamo, da je Komisija glede prispevka Strateškega načrta k okoljskim in podnebnim ciljem zelo kritična saj meni, da je nujna večja splošna raven ambicioznosti. V procesu načrtovanja je Slovenija vložila velike napore, da bi povečala sedanja prizadevanja in na splošno dosegla večjo raven ambicioznosti. Zato verjamemo, da bo Strateški načrt prinesel pozitivne spremembe. V primerjavi s sedanjimi ukrepi in finančnimi sredstvi na obeh stebrih SKP, se bo obseg sredstev povečal, uvedle se bodo nove intervencije na obeh stebrih in obvezne zahteve v okviru pogojenosti bodo bolj zahtevne. Zavedamo pa se, da bo v nekaterih delih potrebno

okrepiti intervencijsko logiko in jasneje začrtati cilje in opredeliti ukrepe, da bodo rezultati Strateške načrta tudi uresničeni.

Po našem mnenju je Komisija v svoji oceni do neke mere morda zanemarila nekatere pomembne značilnosti slovenskega kmetijstva, to je drobnoposestna struktura kmetijstva in razdrobljenost zemljišč, prevladujoče težje naravne in topografske razmere in sorazmerno visok delež ohranjenih naravnih eko-sistemov. Slovenija je pred prelomno točko, kako zagotoviti trajnostni razvoj, to je ohranitev okolja, sledenje podnebnim ciljem, ob dvigu produktivnosti kmetijstva in ohranitvi vitalnosti podeželja in temu primarnemu cilju je podvržen tudi Strateški načrt. Glede na to, da je Slovenija še zmeraj tudi "vroča točka" biodiverzitete v Evropi, si Strateški načrt prizadeva za ohranjanje in, kjer potrebno, za izboljšanje biodiverzitete, vendar s prepotrebni razvojem kmetijstva, brez ogrožanja pridelave hrane v Sloveniji in z ohranjanjem proizvodnega potenciala kmetijskih zemljišč. Naš cilje je trajnostno kmetijstvo, ki pa mora omogočiti tudi ekonomsko preživetje kmetijskih gospodarstev. V tem trenutku si ne smemo dovoliti prehoda v nenadzorovano ekstenzifikacijo in s tem izgube proizvodnega potenciala.

V zvezi z elementi zelene arhitekture je Komisija glede pogojenosti kritična. Izhajamo iz tega, da smo naredili nujne korake za zagotovitev okoljskih in naravovarstvenih ciljev, n imajo države članice prožnost pri določitvi zahtev, vključno z uporabo praga 10 ha. Nadalje, države članice lahko k večji splošni ambicioznosti strmijo z osredotočanjem na intervencije na obeh stebrih. Glede kolobarja in praga 10 ha pod DKOP 7 pa relativno veliko število kmetijskih gospodarstev in zelo razdrobljene kmetijske parcele v Sloveniji kažejo na to, da majhne kmetije že izvajajo kolobar in diverzifikacijo kmetijskih rastlin na letni ravni in na ravni kmetijskih parcel. Kar zadeva DKOP 8 za ohranjanje proizvodnih značilnosti in območij velja omeniti, da je prag 10 ha korak naprej v primerjavi s sedanjim pragom 15 ha. Glede na trenutno situacijo bi prej kazalo razmišljati o ponovnem dvigu praga.

Pri DKOP 9 je Slovenija predana k varovanju okoljsko občutljivega travinja na območjih Natura 2000. Pri tem pa menimo, da je neracionalno z vidika vseh elementov trajnosti določiti vso trajno travinje na območjih Natura 2000 kot okoljsko občutljivo. Delež območij Natura 2000 v Sloveniji je namreč velik (23 % kmetijskih površin), medtem ko sta deleža vseh kmetijskih površin in njivskih površin izraženo na prebivalca med najmanjšimi v EU. V Sloveniji so splošna javnost in deležniki kmetijstva občutljivi na vprašanje lokalne prehranske varnosti, kar se je še posebej zaostriilo po pričetku vojne v Ukrajini. Zato menimo, da v teh razmerah ne kaže povečevati obstoječega sloja okoljsko občutljivega trajnega travinja (skoraj 30 % trajnega travinja na območjih Natura 2000).

Glede območji Natura 2000 menimo, da so za ohranitev biotske pestrosti najprimernejše prostovoljne intervencije in da je predlagan pristop uvedbe izvajanja Natura 2000 plačil na najbolj kritičnih območjih postopoma smiseln. Menimo, da je to pomemben korak naprej, ki ga bomo v nadaljnjih programskih obdobjih potem lahko okrepili.

Komisija tudi naproša, da v Strateškem načrtu izboljšamo nekatere sheme za okolje in podnebje (SOPO) in revidiramo višino podpor nekaterih intervencij. Pri oblikovanju shem SOPO je bil naš namen, da ponudimo kmetovalcem splošno dostopne in enostavne sheme, brez pretiranih administrativnih bremen. Ocenili smo, da je to z vidika strukture kmetijstva v Sloveniji primerno. Tekom pogajanj o reformi SKP smo razumeli, da pravni okvir omogoča, da se sheme SOPO lahko tudi namenijo ohranjanju sedanjega ugodnega stanja.. S predlaganimi ukrepi bi tako želeli zajeti precejšen delež kmetijskih površin in jih ohraniti v okoljsko in naravovarstveno primernem stanju, hkrati pa zadržimo in trajnostno razvijamo mozaično krajino slovenskega podeželja, ki je vir biotske pestrosti in pomembno prispeva k ekosistemskim storitvam

Ena izmed najbolj izpostavljenih in pogosto omenjenih pripomb se nanaša na podnebno komponento Strateškega načrta. Slovenija se po skrbni preučitvi pripomb Evropske komisije in vseh zavezujočih dokumentov na podnebno-energetskem področju strinja, da bi bilo potrebno Strateški načrt dodatno izostriti v smeri zmanjševanja TGP in amonijaka. Naš namen je izboljšati SWOT analizo in intervencijsko logiko ter vsebinsko izostriti ukrepe v smeri npr. bolj ciljno naravnih podpor, natančnejših in bolj razdelanih pogojev / omejitev za pridobitev sredstev (npr. na področju skladiščenja gnojevke, obnove ali graditve hlevskih kapacitet, pridobivanja energije iz OVE, energetske učinkovitosti ipd.), učinkovitejšega ravnanja z dušikom ter spodbujanja rastlinske pridelave na ravninskih območjih. Ocenjujemo, da Strateški načrt sicer že vsebuje obsežen instrumentarij, ki vodi v tej začrtani smeri (z ukrepi SOPO, KOPOP, dobrobit živali in tudi investicijskimi podporami ter ukrepi prenosa znanja in svetovanja), da pa je smiselno te ukrepe dodatno izostriti, jih medsebojno povezati in vsebinsko okrepiti.

Glede prispevka in skladnosti s cilji Zelenega dogovora, Slovenija popolnoma razume, da so cilji potrebni in tudi, da je Komisija dolžna izvesti postopek presoje napora in ambicije držav članic v naslavljanju splošne ambicioznosti. Slovenija želi zagotoviti Komisiji, da so bili cilji Zelenega dogovora upoštevani pri oblikovanju različnih intervencij v okviru zelene arhitekture npr. s prepovedjo ali omejevanjem rabe gnojil in fitofarmaceutskih proizvodov kakor tudi s spodbujanjem alternativnih metod varstva rastlin. Ne gre pa zanemariti nujnosti dostopa do alternativnih sredstev za zagotavljanje zdravstvenega varstva rastlin (na slovenskem trgu), pri čemer je potrebno vso skrb nameniti ohranjanju konkurenčnosti slovenskega kmetijstva. Nacionalne vrednosti za vse cilje Zelenega dogovora niso določene v Strateškem načrtu, ker to ni obvezno in zlasti, ker je v tej fazi težko določiti ustrezno vrednost za te cilje. Bodo pa v prihodnje narejeni ustrezni koraki tudi v to smer.

Kar zadeva pripombo Komisije na prerazporeditveno strategijo, ostaja Slovenija prepričana, da je uporaba derogacije utemeljena in bodo zato posredovana dodatna pojasnila, vključno s podatki.

V zvezi s hitrim širokopasovnim internetom na podeželju, se Vlada RS zaveda, da je to eden izmed osnovnih predpogojev za razvoj podeželja. Na podlagi izkušenj z izvajanjem podpore za širokopasovni internet in dogovora med pristojnimi ministri, se je Slovenija odločila, da v celoti financira podporo za širokopasovni internet v okviru kohezijske politike na podlagi Partnerskega sporazuma za programsko obdobje 2021-

2027 in Načrta za okrevanje in odpornost. To bi moralo zagotoviti 100 % pokritje slovenskega podeželja s širokopasovnimi povezavami. Prepričani smo, da je tak pristop popolnoma skladen z Dolgoročno vizijo EU za podeželska območja in priporočili Komisije, da v polnosti izkoristimo potencial usmerjanja sredstev iz različnih skladov EU v podeželje. Skladno z načelom subsidiarnosti se je Slovenija odločila, da bodo pokritost podeželja z internetom 100 % financirali drugi skladi EU in naproša Komisijo, da to upošteva in da je konsistentna pri proučitvi in odobritvi različnih strateških in programskih dokumentov za Slovenijo.

Prepričani smo, da smo v osnovi s strukturo in pristopom Strateškega načrta naredili pomemben korak k uresničevanju zastavljenih ciljev, in da zaradi tega večji posegi v strukturo Strateškega načrta in v razmerja med intervencijami niso potrebni. Želeli bi poudariti, da je pri pripravi načrta bilo, skladno s pravnim redom EU, doseženo temeljno soglasje med ključnimi deležniki in tega ravnotežja ne bi bilo smiselno koreniteje odpirati, ob tem pa bomo poskušali slediti priporočilom Komisije in z vso občutljivostjo, a tudi natančnostjo, določene elemente tudi izboljšali, tudi kot odziv na ukrajinsko krizo, ki je pokazala na strateško vlogo kmetijstva EU za prehransko varnost. V največji možni meri bomo posredovali dodatna pojasnila in podatke.

Za konec bi se želeli zahvaliti Komisiji za pripravljenost, da se odprta vprašanja kmalu pričneje reševati na tehničnih sestankih, s ciljem, da je Strateški načrt odobren čim prej. V nadaljevanju lahko pričakujete nekaj podrobnejših pojasnil in dodatnih informacij, pomembnih za nadaljnje usklajevanje.

Ponovno pa bi pozvali Komisijo, da pri presoji Strateškega načrta upošteva posebnosti Slovenije.

Dr. Jože Podgoršek
minister