



How transparent and inclusive is the design process of the National CAP Strategic Plans?

After the first steps made towards designing the National CAP Strategic Plans, this article analyses the transparency and stakeholders inclusivity in six selected Member States: France, Ireland, Italy, Germany, Spain, and Poland. The results show interesting practices in terms of establishing written revision procedures or online platforms but identify numerous limitations and gaps to be urgently addressed by the Member States and the Commission. It also raises some concerns on the implications of the new delivery model for building decentralised governance capacity and better stakeholder involvement at regional level. To tackling these limitations for the next preparatory steps, the article calls on the Commission and the Member States to work on the following areas: better communication channels; publication of updated and dynamic roadmaps; more transparent consultations and negotiation meetings; clearer written procedures, and better stakeholder consultations. Some recommendations are also provided for NGOs and civil society organisations.

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Introduction

Transparency and stakeholder inclusiveness can be argued to be two sides of the same coin. Both are important to trigger systemic changes in the current CAP. After the first steps made towards designing the National CAP Strategic Plans, ARC2020's #CAPStrategicPlans project has animated a network of national coalitions to answer the question:

How transparent and inclusive is the design process of the National CAP Strategic Plans?

In this analysis, transparency is understood as the proactive disclosure of public information, such as SWOT analysis, roadmaps and timelines, minutes of meetings, workshop reports, list of consulted stakeholders. Stakeholder inclusion refers to the engagement of individuals (or a group thereof) with specific roles and responsibilities.

Good practices and limitations on the level of transparency and inclusion have been analysed via online focus groups and qualitative data collection supported by active national coalitions in six Member States: France (FR), Ireland (IE), Italy (IT), Germany (DE), Spain (ES) and Poland (PL). As background, Table 1 provides an overview of the main milestones achieved by these Member States when this analysis was conducted.

Table 1: State of play in the analysed Member States up to end April 2020

Member States	SWOT analysis			Assessment of needs		
	Starting	Consultation	Publication	Starting	Consultation	Publication
DE	Q1 2019	✓	Link*	Q4 2019	✓	
ES	Q2 2019	✓	Link*	Q1 2019	✓	Link*
FR	Q4 2019	✓	Link	Q4 2019	✓	Link**
IE	Q2 2019	✓	Not available	Q2 2020		
IT	Q2 2019	✓	Link	Q1 2020		
PL	Q3 2019	✓	Not available	Q3 2019	✓	

* Documents published as draft. ES covered both assessment and prioritisation of needs

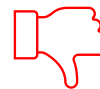
** Needs assessed, but not prioritised yet

To this picture, it should be added that:

- Some Member States, such as IE and DE, are starting to work on the CAP interventions
- FR is running a nation-wide public debate accompanying the design of the CAP SPs
- In some Member States, consultations and documents are still internal and therefore cannot complete this table (e.g. IT is working on assessment of needs, but still internally)
- The timeline across almost all EU countries has been, and will continue to be, affected by the COVID-19 and political decisions at EU level (e.g. MFF)

The results presented in the following sections show good practices, but also important gaps and areas to be urgently addressed at EU and Member State level. Therefore, this study calls on the Commission, the Member States, and also NGOs and civil society organisations (CSO) to implement specific actions to increase the level of transparency and inclusion in the remaining steps before the final approval of the CAP SPs by the Commission.

#Setting up and updating official communication channels



What did we observe in the Member States?



<ul style="list-style-type: none"> • Setting up of online pages on the ministry websites and online platforms to streamline information exchanges and communication with stakeholders (e.g. FR, ES, IE, IT) • Establishment of contact points, mailbox, and references to get in touch with the responsible units in the Ministry (e.g. ES, FR) 	<ul style="list-style-type: none"> • The more effective channel to get updates are informal ones (e.g. IT) • Slow reactions from the Ministries to NGOs and CSOs' questions & contributions (e.g. PL, ES)
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We call for...

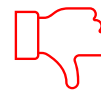


1. The Commission should make the **CAPReform Wiki** established in its [management plan](#) (Pag. 67) publicly available within upcoming weeks to facilitate the overview and follow up of the CAP reform process across the Member States. This includes also giving access to the email address of the Commission's '**geographical hubs**' and publish a schedule' to inform the submission of documents from the Member States to the Commission (e.g. SWOT analysis, assessment of needs, etc.).

2. The Member States should build and improve existing communication channels, including websites and platforms, to continuously and openly interact with the CSOs, NGOs, scientists. This should include simple tools adapted to the COVID-19 circumstances (e.g. sections with short videos, monthly webinars).

3. NGOs and any active actors should continue to regularly follow the CAP SPs design process throughout its steps, informing the wider society about the directions taken and defend common positions through communication campaigns and meetings.

#Publishing and updating roadmaps



What did we observe in the Member States?



<ul style="list-style-type: none"> • Indicative roadmaps of the CAP SPs preparation have been published online in ES and DE • Clear and easily accessible timeline for public debate around CAP reform (e.g. FR) 	<ul style="list-style-type: none"> • No publication of any roadmaps (e.g. IT, PL) • Unclear timelines or referring only to past activities (e.g. IE, IT, PL) • Static (i.e. without adding specific dates along the process) roadmaps (e.g. DE, ES) • Access to roadmaps only for appointed stakeholders involved in the design process (e.g. FR)
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We call for...

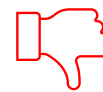


1. The Commission should foster the exchange among the Member States and increase the overall level of information of the public. To do this, it needs to update and publish progress made by each Member State in preparing the CAP SPs, while also making available the contact reference of the responsible unit in each Member States.

2. The Member States should envisage more dynamic tools for informing citizens about the progress made and to be made along their roadmaps. Generic timelines should be complemented with specific dates of important meetings, workshops, milestones.

3. NGOs and CSOs should continue to be active at every step of the process to carefully keep track of the consistency between different elements of the CAP SPs (e.g. interventions, SWOT, assessment of needs, SEA, ex-ante evaluations, other EU and national policies).

#More transparent & effective consultation meetings



What did we observe in the Member States?



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| <ul style="list-style-type: none"> Facilitated workshops involving a diverse range of stakeholders for the SWOT analysis (e.g. DE, IE) Minutes, PPT presentations, documents, and lists of organisations attending the meetings with the Ministry are published online (e.g. IE) The list of consulted stakeholders is shared among all participants (e.g. FR) | <ul style="list-style-type: none"> Bilateral or collective meetings with stakeholders held without publishing minutes or list of organisations attending them (generally across MS) Written workshop reports which do not adequately reflect the outcomes and discussions of the meetings or workshop (i.e. DE) Collective meetings with the Ministry are poorly facilitated. Interactions are going in one direction (from stakeholders to the ministry) (e.g. FR, IT) |
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We call for...

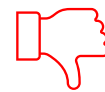


1. The Commission should publish clear criteria to be used for the negotiation and approval of the CAP SPs, including also criteria related to the transparency and inclusivity of their design process. Good practices should be collected and shared across the Member States and the application of tools should be better supported (e.g. [Stakeholder Mapping Checklist. Tool 1.4](#)).

2. The Member States should increase the transparency of their consultation meetings and working progress. Effective facilitation methods must be deployed for gathering and discussing multiple contributions, utilising the most updated online tools during the COVID-19 restriction measures. Workshop reports should include NGOs input.

3. NGOs and CSOs should organise their efforts with allies from other countries, sharing good practices and limitations, and bring them to suggest improvements to their national ministries.

#Setting up clearer written working procedures



What did we observe in the Member States?



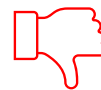
<ul style="list-style-type: none"> • Justifications will be provided by the Ministry if some contributions from the public debate on the CAP reform are rejected (e.g. FR) • For the public debate, templates are developed to organise the collection of inputs from stakeholders, including NGOs and CSOs (e.g. Kit "J'organise mon débat" in FR) • Clear instructions, submission forms, tools, timeline, and procedures for the consultations on the draft SWOT analysis (e.g. IE) 	<ul style="list-style-type: none"> • No feedback or justifications after sending comments or contributions to draft documents (across many Member States). • Lack of clarity on the procedures for written revisions and final outcomes (across many Member States) • Updated versions of documents accessible only to selected members of official working groups set up by the ministry (e.g across many Member States) • Still lack of clarity on the criteria to be used for the prioritisation of needs (across many Member States)
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We call for...



- 1. The Commission** should require the Member States to state the criteria for prioritising the assessed needs and examine their implications on the final CAP SPs.
- 2. The Member States** should set up clearer procedures and timeline for written consultations. Justifications for rejecting proposals should be provided to the NGOs. Enough time should be allocated to receive contributions. Last minute consultation should be avoided. Templates can be provided for collecting contributions. Each stakeholder contribution should be made publicly available.
- 3. NGOs and CSOs** should ask their Member States to set up clear written consultation procedures, suggesting good practices from other EU countries.

#Better and larger involvement of scientists, civil society and NGOs



What did we observe in the Member States?



<ul style="list-style-type: none"> • A lot of input provided by smaller stakeholders (compared to larger farm unions) was considered in the validation of the diagnosis and SWOT analysis (e.g. FR) • SWOT analysis guidelines developed at National level to encourage and coordinate bottom-up, regional contributions of the CAP Strategic Plans 	<ul style="list-style-type: none"> • Apart from the SWOT analysis, CAP consultations and work are mainly based on ‘appointed experts’ or official actors, like national and regional authorities (e.g. IT, DE). This limits the contribution of other actors (e.g. environmental NGOs). • Only a few IT regions conducted their own consultation process and SWOT analysis (e.g. Lombardia). This heterogeneity raises some doubts about the regional coherence and territorial representation at national level.
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We call for...



1. The Commission should:

- Make sure that Monitoring committees are set up soon (Article 111 of CSP Regulation) and that their competency on draft strategic plans is not deleted during the negotiation in trilogues (interinstitutional negotiation);
- Set up arrangements for checking the level and diversity of stakeholder consultation in the Member States during the design of the CAP SPs (e.g. list of organisations, meetings)
- Examine how national SWOT analysis and assessment of needs reflect the regional dimensions in countries like IT, DE, FR, ES, PT, BE. Regional imbalance should be avoided.

2. The Member States should:

- Consult a wide range of stakeholders apart from the official authorities, statistical offices, and farmers unions. Stakeholders from the social, environmental, and economic domain should be consulted in a balanced manner. Do not restrict the civil society consultation to one or two environmental NGOs. Small-farmers or organic farming unions, animal welfare, beekeeper unions, consumers NGOs should also be consulted
- Encourage a public debate instead of limiting the consultations between stakeholders and ministries
- Respect and promote gender equality in every step!
- Encourage contributions and proposals, not only comments and revisions.

3. NGOs and CSOs should continue to

- Network with other ally NGOs and CSOs at EU, national or regional level and build collective knowledge and capacity
- Reach out to the citizens, progressive policy makers, and scientists to collect evidence and opinions for their campaign strategies
- Bridge the information gaps on the future directions of the CAP SPs in your country and mobilise collective actions for more sustainable agriculture, forestry, and rural development.

Conclusions

This analysis has highlighted the urgent need for better exchanges of good practices across the Member States in terms of ensuring transparency and inclusivity while designing the CAP Strategic Plans (CAP SPs). More importantly, it calls on the Commission and the Member States to be more responsible and proactive in this area.

The study is limited only to six Member States, but good and bad practices exist elsewhere in the EU. Online exchanges with national coalitions from other countries highlighted the high diversity across EU. In some Member States, the level of transparency and stakeholder inclusion is very minimal. This study also raises some concerns on the effects of the new delivery model on building decentralised regional governance capacity and better involvement of local stakeholders. COVID-19 restrictions have, in many cases, exacerbated the lack of proactive actions in the Member States. Open meetings, debates, and consultations have been cancelled, postponed or transferred to online formats.

A word of caution: full transparency of public decision-making is impossible. However, it is important to look at the ongoing lobbying and official procedures within the EU institutions and the Member States. Two years after the Commission's proposal for the CAP post-2020 regulation, it is still very difficult, even for the authorities working within the ordinary legislative process, to keep track of the latest documents or amendments approved in the Council. A recent example is the French proposal for (drastically) simplifying the Commission requirements for the performance reviews (PMEF). The proposal was presented on February 2020 during an expert group meeting held by the Commission (see [agenda](#)), and largely approved in one of the Council Working Party's meetings. However, neither the documents, nor the Member State's positions can be easily accessible.

Some skepticism should also be reserved for what concerns 'inclusion' or 'stakeholder consultation', especially with the new delivery model. While a few coalitions highlighted that their contributions were really taken on board after the consultations, there is generally large scope for all Member States to go beyond a 'box ticking' exercise or any form of tokenism in public consultations. It is not an easy task for large countries to deal with a wide arena of stakeholders and consider their aspects (legitimacy, history, representativeness, etc.). However, special attention should be given to the following: the clarity of procedures; removal as far as possible of barriers to accessing consultations; improving facilitation of interactive methods, timeline, justifications and feedback; and equal representation in terms of gender and stakeholder groups.

Nevertheless, our analysis encourages numerous practical actions to increase the level of transparency and inclusion in the next steps of preparation, including their

final adoption. After SWOT analysis and assessment of needs, the design of the CAP SPs includes numerous elements, such as the ex-ante evaluation, SEA (Strategic Environmental Assessment), setting up of targets and milestones, definition of interventions and conditionalities, etc. Much is still to come before we can finally judge the level of transparency and inclusivity in the new model of national strategic planning.