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The 2015 direct payments campaign is extended

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On April 23, 2015, at a meeting of the Committee on Direct Payments in Brussels, the European Commission presented a draft regulation to extend the application deadline for the 2015 Campaign. The proposal was unanimously supported by all member states. The extension affects all schemes and measures for direct payments, transitional national aid, and the measures under the Rural Development Programme, for which applications are submitted via the single aid application form.

The regulation is expected to be published on May 20, 2015.

The extension of the deadline to June 15 will only be possible for 2015 and will be voluntary for implementation by member states based on a national decision. Each country can independently decide whether to extend the deadline and by how much, with the maximum possible extension being until June 15, 2015. Extending the standard application deadline automatically extends the

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late application period with a sanction by 25 calendar days after the set extension date. It is important to consider that a potential deadline extension could negatively impact the schedule of checks and the timely payments to beneficiaries.

The Ministry of Agriculture and Food proposes three options for action when making a national decision regarding the extension of the application deadline for the 2015 Campaign. The potential consequences of the respective decisions are also taken into account:

Option 1 – No extension of the deadline – final deadline May 15, 2015 (without sanction) and final deadline June 9, 2015 (with a 1% sanction for each day delayed after May 15, 2015)

The application conditions announced at the beginning of the 2015 Campaign and within the conducted information campaign continue to apply.
No change to the current legislation is required.

The retention periods for animals under the coupled support schemes for animals (80 days – i.e., for 2015 from June 10 to August 28, 2015) and the scheme for transitional national aid for sheep and goats (100 days – i.e., for 2015 from June 10 to September 17, 2015) are maintained according to the dates announced in the information campaign.

The pre-announced date by which applicants under the scheme for transitional national aid for cattle (decoupled) must keep 70% of the reference animals on their holding (for 2015 – June 9, 2015) is maintained.

Risks

There is a risk that not all potentially eligible areas for support can be declared due to the limited timeframe.

Risk of a slower pace in the application campaign due to the new elements introduced in 2015 and an increased risk that not all interested farmers will be able to submit an application due to insufficient time during the campaign.

Option II – Partial extension of the deadline – final deadline May 29, 2015 (without sanction) and final deadline June 23, 2015 (with a 1% sanction for each day delayed after May 29, 2015)

During the campaign, the application conditions announced at the beginning of the 2015 Campaign and within the conducted information campaign are changed.
A change in the current legislation is necessary.

The retention periods for animals under the coupled support schemes for animals (80 days – i.e., with the extension for 2015 from June 24 to September 11, 2015) and the scheme for transitional national aid for sheep and goats (100 days – i.e., for 2015 from June 24 to October 1, 2015) are changed according to the dates announced in the information campaign.

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The pre-announced date by which applicants under the scheme for transitional national aid for cattle (decoupled) must keep 70% of the reference animals on their holding is changed (for 2015 – June 23, 2015).

Certain difficulties are created for conducting timely checks on eligibility conditions under the schemes and for continuing the payment schedule for the aid, applied until 2015.

An opportunity is provided to catch up on the delay in the campaign's progress, and the risk that not all interested farmers will be able to submit an application due to insufficient time during the campaign is eliminated. Farmers are given more time to familiarize themselves with the new elements of the policy and to decide on the schemes for which to apply.

On the other hand, however, the time for calculating the due aid for potential applicants under the scheme for small farmers, sending notifications to them, and their assessment of whether to apply under the scheme, which must be completed by October 15, 2015, is reduced.

Risks:

Danger of delaying the schedule for processing applications, including performing risk analysis, cross-checks, sending notification letters for overlaps, resolving overlap cases, which will correspondingly reflect in a possible delay of the payment date of the aid to farmers.

Implementing this option achieves a certain balance between the negatives of delaying checks and payments and the benefits of extending the time during which farmers can submit aid applications. This is the relatively most balanced implementation option, where the benefits of the deadline extension and the opportunities for farmers will allow taking a measured risk of delaying control for the purpose of long-term balanced and positive development of the sector.

Option III – Maximum extension of the deadline – final deadline June 15, 2015 (without sanction) and final deadline July 10, 2015 (with a 1% sanction for each day delayed after June 15, 2015)

During the campaign, the application conditions announced at the beginning of the 2015 Campaign and within the conducted information campaign are changed.
A change in the current legislation is necessary.

The retention periods for animals under the coupled support schemes for animals (80 days – i.e., with the extension for 2015 from July 11 to September 28, 2015) and the scheme for transitional national aid for sheep and goats (100 days – i.e., for 2015 from July 11 to October 18, 2015) are changed according to the dates announced in the information campaign. This automatically means that beneficiaries under the scheme for transitional national aid for sheep and goats will in no case have the opportunity to receive subsidies on October 16, 2015, as the retention period will not have expired.

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The pre-announced date by which applicants under the scheme for transitional national aid for cattle (decoupled) must keep 70% of the reference animals on their holding is changed (for 2015 – July 10, 2015). Farmers are given more time to familiarize themselves with the new elements of the policy and to decide on the schemes for which to apply.

Risks:

The time for calculating the due aid for potential applicants under the scheme for small farmers, sending notifications to them, and their assessment of whether to apply under the scheme, which must be completed by October 15, 2015, is reduced. Danger of delaying the schedule for processing applications, including performing risk analysis, cross-checks, sending notification letters for overlaps, resolving overlap cases, which will correspondingly reflect in a possible delay of the payment date of the aid to farmers.

Inability to perform payments under the measures of the RDP 2007-2013 and RDP 2014-2020 in December 2015, which in recent years have been carried out in December of the application year due to the shift in checks of physical blocks and the corresponding later submission of results for physical blocks and the specialized layer "Areas Eligible for Support" by the Paying Agency. Difficulty in complying with the deadlines for sending approval/disapproval letters to applicants under Measure 10 and Measure 11 of the RDP 2014-2020.

The entire document "Application Period for Aid for the 2015 Campaign" (Analytical Working Document) can be downloaded from the website of the Ministry of Agriculture and Food.