

**Answers to questions asked using Sli.do during
the 24th MARS conference in Dubrovnik, 21-22 November 2018**

Please note that answers are provided only for questions directed from the audience to the Commission (DG Agri and DG JRC).

The numbering follows the sequence of the questions record in Slido. No edits are made to the questions. The score indicates the number of votes (for that question) from the audience.

Disclaimer

The replies given in the document cannot be taken as expressing an official or legally binding position of the Commission. Should delegates/MS require an official reply, they should address the question officially to DG Agri D3.

	Question text	Score
	Session: Anticipating the new CAP	
1	Will the national strategic plans be available in a common language (e.g. English) to facilitate cross-country knowledge exchange? Response: Not known at this stage but most likely not since Strategic Plans will be submitted in the national language(s). Please note that other forums exist where MS can exchange experiences (ENRD, expert groups, etc.).	0
	Session: Monitoring is everywhere	
2	Why do we have only little tolerances for example 50 euro for no follow up checks? The tolerance could be 0.50 ha Response: The financial impact of a 0.50ha parcel is different between MS and sometimes even within MS (BPS countries). A monetary threshold ensures equal treatment of farmers.	12
16	How many countries did the notification to the EC that they are going to implement monitoring approach in 2019? Response: 5 EU Member States will apply area monitoring in 2019.	17
17	The financial impact for the clearance of the follow-ups has to be computed at holding, but the threshold in Euros apply parcel by parcel or to the sum of all the parcels in yellow? Response: The impact on payment has to be calculated taking into account all yellow parcels. More details on how to calculate the impact on payment are given in Q9 of the Q&A document on monitoring published by AGRI in August 2018, and the addendum to the Q&A, which will be published on Circabc after discussion with MS (presented in the Committee for Direct Payments on 22/01).	8
18	There was said that you are going to stop delivering VHR images because of monitoring approach. Some requirements are not possible to verify by monitoring so there should be traditional control. How do you face it? Response: In the current legislation, the checks by monitoring are optional. MS may keep OTS checks for the scheme(s) they a priori consider not 'monitored'.	14
19	@Commission: Can a classification be used as a marker? Response: No, but classification can be used in the procedure for processing of the aid application. Member States are free to choose the data analysis method they find the most suitable for checks by monitoring.	2

20	Will the implementation of monitoring be compulsory or voluntary and the member state can make its own sovereign decision to implement monitoring? Response: Implementation of checks by monitoring is optional.	9
21	For DGAgri, Legal issues when farmer will be declined a payment because of red light? Response: MS used results of remote sensing photo-interpretation to apply penalties as well.	2
22	How to implement monitoring if farmers in GSAA declare over 400 different plant species? Response: The relevance of the different plant species should be analysed in the context of the given payment scheme. From the JRC experience, in many EU Member States 5 to 20 species cover 80%-90% of the SAPS/BPS area. Thus, the majority of the others would be considered as "rare crops" and can be processed as explained in Section 2.1 of the document DS/CDP/2018/18.	10
23	Should we apply the financial impact filter once we calculate it for each non-conclusive parcel on all schemes at the beneficiary level? Or we add the impact of all parcels of each beneficiary and apply later for each beneficiary? Response: For information on calculating the impact on payment, please consult Q9 of the Q&A document on monitoring published by AGRI in August 2018, and the addendum to the Q&A, which will be published on Circabc after discussion with MS (presented in the Committee for Direct Payments on 22/01).	0
24	@Anna@Commission You spoke about simplification and that IACS itself is not a Strategic Plan, nor should it shape a Strategic Plan. Is there a danger that the Plan, becomes shaped by the available technology and its limitations? Response: Modernisation of the CAP and the use of new technologies is a cross-cutting objective of the CAP proposal for the post-2020 period. Hence, this has to be taken into account when developing the CAP Strategic Plan. According to the proposed Horizontal Regulation, what COM will not do is approve the controls and penalties systems designed by MS for interventions defined in the CAP Strategic Plan.	2
25	How to implement monitoring in a situation where only less than 30 percent of parcels realise 2 conditions simultaneously:- area of parcel larger than 0.5 ha-one agriculture parcel = one reference parcel? Response: The question is not clear. Anyhow, checks by monitoring are based on the farmers declarations made in the GSAA, not on the reference parcels.	8
27	Tailoring the traffic light system is fully up to the MS? E.g. evaluation on payment impact can be before asking for geotagged photos (it is a follow up action then) Response: As mentioned in section 3.3 of the DS/CDP/2018/18: "Member States should not too readily bypass these procedures by controlling the flow and appropriate processing by setting financial criteria. Monitoring is primarily based on physical properties and factual observations of the land. The financial thresholds of the manual processing are intended as a back stopper only and should not be viewed as an a priori excuse to exclude any parcel with low financial impact (albeit on holding level) from the monitoring cycle."	1
28	Isn't it better to be honest to the farmer and admit that monitoring IS 100% control? And at the same time emphasize the benefits for the farmers in the long run (like our Danish colleague has explained)? Response: It is up to the Member States to choose the communication channels and the message that will be conveyed to the farmers. Nevertheless,	2

	the checks by monitoring have been designed to be a pro-active preventive system. With the possibility to alert or remind farmers about activities still to be performed, one can avoid possible errors or infringements and thus financial penalties. In the current control system, the intervention is done after error or infringement and leads to penalties.	
29	<p>We would like to ask the com staff to clarify with the court of auditors the question of capturing the real use, the real AP because since the disposal issue is on the table it goes to the wrong direction. Not only in Bulgaria!</p> <p>Response: COM takes note of the request.</p>	4
30	<p>For narrow parcels 2-3 meters wide area is not relevant S2 are not enough, we need better resolution imagery, Spot 6 and 7 are two of the better sensors to check this parcels, commission will support MS with this kind of data if is needed ?</p> <p>Response: In justified cases, i.e. if after the small parcel sifting analyses, small parcels without conclusions still consist a high number, the EC/JRC should be informed and HHR data stacks may be provided.</p>	2
31	<p>Why the marker concept? For BPS/SAPS it is enough. But when crop detection is needed, classifications give results in a simpler way. In some cases it gives the answer, we must ask from farmer e.g. change in area of management/FOI</p> <p>Response: The reasoning behind the marker concept is discussed in the DS/CDP/2018/18 document (see sections 1.3 and 2.3).</p>	2
32	<p>Commission will support independent companies to access real data (farmer sketches)? We need this data to be able to develop and present viable monitoring solutions for real life situations.</p> <p>Response: The Commission provides the regulatory framework for IACS but is not the owner of IACS data. Any requests for such data should be addressed directly to MS authorities or, even better, to farmers directly if it is their data you need (farmers declarations).</p>	2
33	<p>Do orthophotomaps prepared from photos of drone (2,5 - 25 cm resolution) also have to be validated?</p> <p>Response: All imagery used for area measurements in the frame of the on the spot checks should be of quality corresponding to the quality of cartographic products at the scale of 1:5000 or better. While not mandatory, it is recommended to Member States to validate their measurement tools. More information can be found here: https://marswiki.jrc.ec.europa.eu/wikicap/index.php/Valid_Method</p>	4
34	<p>@Commission. Q-29 of DG Agri Q/A document establishes the obligation to monitor parcels located outside the area chosen for monitoring for a given beneficiary. This is a really burdening and unnecessary task. Could it be eliminated in 2019?</p> <p>Response: The reply to a similar question is given in the addendum to the Q&A which will be published on Circabc after discussion with MS (presented in the Committee for Direct Payments on 22/01).</p>	5
35	<p>Can small parcels put to a separate lane at the beginning and directly asked for geotagged photo or sampled with a VHR or field visit till crop is physically there ? Or should they be managed after the dossier level filter?</p> <p>Response: Conceptually lanes correspond to schemes or parts of the schemes (see Figure 6 in DS/CDP/2018/18). For practical reasons, small parcels could be put into sub-lanes. For all parcels less likely to reach conclusive assessment based on the Sentinel data analysis alone, alternative information sources</p>	1

	should be foreseen and if farmer's input is required, requested as early as possible.	
36	Will all the Q&A's (including answers) be available in writing afterwards? Response: Only answers for questions directed to attendees from the Commission are provided.	1
37	At CD need not finish monitoring process every time at small parcels. But at BPS/SAPS above the certain financial impact we must. We also cannot solve with markers the required maintenance in this cases. Small parcels are still a question. Response: Please see the answer to question 53.	0
38	@Blanka would be interesting to see how combined S1&2 markers would perform in your small parcel analysis - any idea? Response: The study discussed in the conference was focused on the comparison of optical sensors time series but could be further extended, to consider S1 radar data as complementary to S2 imagery.	4
39	The buffer it's maybe not too "important" for profilés but for classification purposes....could be different. ... Response: The case study compared curvatures of NDVI time series and did not involve classification.	1
40	@Blanka, only 153 parcels in your study? Response: Although the study was performed on a limited sample of parcels (caused by limited resources and limitations of the 1C/2A level CC mask), it demonstrated the considerable potential of Sentinel-2 imagery. We are currently working on extension of the sample.	5
Session: Good also to know		
41	Why grass land is a problem for monitoring? We already have grassland areas mapped and coded in LPIS we just need to check overgrazing burning and unwanted vegetation presence on this areas already isolated not to map again the grassland. Response: Please consult point 4.2.3. of DS/CDP/2018/18 .	4
42	How you can distinguish the abandoned vegetated land from the pastureland were the density of the animals is low? Response: Please consult point 4.2.3. of DS/CDP/2018/18 . More information on the subject will be available at a later stage, based on experiences collected during the first years of implementation of the monitoring.	12
43	Can we have the questions and answers from yesterday in a written form? Response: Only answers for questions directed to attendees from the Commission are provided.	18
44	Pavel, I agree, but wheat/barley distinction using phenological time difference often does not work...it is enough a strong rainfall and the farmers postpone barley seeding.... so you can detect wheat instead of barley... Response: Monitoring would not rely of Sentinel data alone. Real-time meteorological data can be used in order to accommodate the annual variations in crop management and development caused by the different weather conditions. We may also take into account that farmers can inform the administration about these changes. More information on the subject will be	9

	available at a later stage, based on experiences collected during the first years of implementation of the monitoring.	
45	<p>Pavel. About spatial markers. Can you explain the concept of "relative size"? What do you use the segmentation for?</p> <p>Response: In the context of the slide presented, the "relative size" is the area of the produced segment within the original FOI (declared parcel) as compared to the total area of the FOI. Automatic segmentation can be useful to detect changes in the FOI during the monitoring and, in case of such, to estimate the magnitude of the change area wise. More information on the subject will be available at a later stage, based on experiences collected during the first years of implementation of the monitoring.</p>	3
46	<p>@P. MILENOV: Are you using data from 2017 to train your system to classify classes in 2018?. How do you deal with differences in the signals (f.e. 2017 and 2018) caused by climate or extreme weather phenomena like this years hot summer?</p> <p>Response: The main reason to use data from previous year is that it covers the complete agronomic season (better training data for the machine learning) and can be further validated by the data collected during the OTS controls. Unless there are significant weather extremes and other force-majeure circumstances, there is no reason to expect notable changes, for the majority of the fields, of the crop calendars and cultivation patters applied in the following years. Regarding the impact of weather variations and extremes, please consults the answer to question 44.</p>	15
47	<p>@Pavel: A classification algorithm like random forest can identify and use markers across different years and spectral/SAR signatures. Can this be used instead of the markers?</p> <p>Response: The Member States are free to choose methods and techniques of data analysing that are optimal in their own particular conditions and system setup. In any case, the marker concept has some key advantages in the monitoring context comparing to the other automated techniques, such as: (1) it offers the closest analogue to the photo-interpretation keys applied by the CAPI operator in his/her expert judgement process, as part of the CwRS; (2) it ensures that the results are easily traceable and auditable (not a black box), by non-experts in the machine-learning domain; (3) it is based on concepts that are familiar to the farmer (changes in land phenomenon reflecting agricultural activities) , thus allowing efficient interaction in case of warning or follow-up.(4) it accounts more thoroughly the time dimension - key factor in the monitoring.</p>	14
48	<p>Why complicate it with markers? Will not machine learning/neural network make the classification without markers?</p> <p>Response: Please consult the answer to question 47</p>	15
52	<p>What is the better core marker for land set aside in BPS? Is no abandoning verification enough?</p> <p>Response: Land being left as set aside is not subject to the agricultural activities occurring on active arable land; thus, the absence of notable anthropogenic interventions on the land phenomenon will be reflected by a "smoother" signal temporal curve similar to the one typical for permanent grasslands. Consequently, the similar set of non-compliance markers for detection of land abandonment could be used. More information on the subject will be available at a later stage, based on experiences collected during the first years of implementation of the monitoring.</p>	0
53	<p>Sifting System for reduction the relevant number of small parcels: Does this system also take into account, that the criteria of the minimum activity has to be controlled on all parcels.</p>	0

	Response: It depends on the type of minimum activity defined by the EU Member State/ Region.	
54	<p>@Pavel: If a classification provides better results than the marker approach, is this not more important than the ability to explain the result to the farmer?</p> <p>Response: We need to clarify that the current classification techniques and the marker approach operate in different context and serve different purposes. While in the majority of cases, the classification is applied to generate a static "map" product with pre-defined class labels, the marker approach aims to provide an almost real-time decision on field-by-field basis in dynamic environment. A direct comparison of the performance of both approaches is not possible. Member States are free to choose methods and techniques of data analysing that are optimal in their own particular conditions and system setup.</p>	0
Session: Data sharing		
55	<p>@Piotr For declared parcels sharing you mentioned anonymisation. Does it mean each farmer will get a fake id, or farmer information will be completely removed?</p> <p>Response: The farmer data should not be disclosed. The IACS data sharing covers only non-personal data. If in a particular database there is a direct link to the farmer's personal data, the link should be removed for the purpose of data sharing.</p>	10
56	<p>Piotr: important for the performance way of working are the EU specific objectives. Until now I see only qualitative descriptions of these objectives. Do the you come with quantitative specific objectives and of if yes do you have an example?</p> <p>Response: The specific objectives are specified in the Commission's proposal for the new CAP as presented in June 2018. The discussions are now being continued within the co-legislation process. Any detailed descriptions of the specific objectives will be presented to MS/ European Parliament during the process.</p>	4
57	<p>@Wodja. Are you planning any kind of legal framework to support and promote MS data sharing initiatives? Have you analyzed legal constraints, specially regarding personal data sharing?</p> <p>Response: For the current CAP period, we are planning to present a Questions & Answers document explaining the legal aspects of data sharing, including clarifications on geographical data to be shared and personal/non-personal aspects. This document will be completed with the technical guidelines on how to share data.</p>	11
58	<p>In terms of GDPR there is an increased emphasis on protection of personal data. Are LPIS parcel identification numbers considered to be personal data?</p> <p>Response: LPIS data are in principle non-personal data. If the LPIS identification number does not allow third parties or citizens to directly identify the farmer(s) using that parcel, it should not be considered as personal data.</p>	13
59	<p>@Toth. LULUCF deals with land change from 1990 (and even earlier). (a) How do you get data previous to 2005 where there was no LPIS? (b) How do you deal with "artificial" changes in time series just due to the change of methodology?</p> <p>Response: a) Sharing and reusing IACS/LPIS data in other domains are envisaged in the spirit of the INSPIRE Directive, which does not require the collection of new data. Moreover, collecting and digitising historical data would</p>	6

	<p>be more than difficult. Consequently, a change in the national LULUCF accounting methodology, which incorporates IACS/LPIS data, can start from the moment, when such digital data are available.</p> <p>b) Theoretically two scenarios might be possible. If there are studies with robust evidences on the impact of the methodology change in terms of the different land cover types, they could be directly considered in course of the accounting process. When such data is not available, the impact of the changes should be estimated and should be considered as uncertainty in the calculations. The viability of these approaches, however, should be confirmed in practice. If a member state provides necessary input data, the services of the Commission may arrange a small pilot to evaluate these approaches in practice.</p>	
60	<p>Are the presentations going to be somewhere we can download them?</p> <p>Response: All the presentations can be found at the following location: https://ec.europa.eu/jrc/en/event/conference/24th-mars-conference</p>	11
61	<p>@Piotr and Katalin: In respect of the idea of IACS data sharing and usage at the pan EU level how you want to solve the issue of different eligibility national LPIS profiles to avoid misunderstandings?</p> <p>Response: Eligibility profiles, as exchanged for the LPIS QA annual exercise purposes, provide standardized and universal description the nation-specific agriculture land cover types, though the use of the FAO Land Cover Classification System (and its successor, the Land Cover Meta Language). This technical setup provides the basis for the required semantic harmonization and helps the clarification of potential misunderstandings, if encountered.</p>	10
65	<p>Piotr: will the whole set of LPIS parcels need to be shared? Are parcels which are not declared in an aid application still in scope?</p> <p>Response: All active parcels in the LPIS should be shared even if they are not declared in a given year.</p>	7