

This series of informative fiches aim to present, in summary, examples of practices and approaches that EU Member States and Regions have put in place in order to implement their rural development programmes (RDPs) in the current period. These examples want to contribute to the understanding of what has worked well and less well in the delivery of the 2007-2013 RDPs and as far as possible, draw lessons in the view of future improvement of the programmes.

N. **06** 

### Improving application procedures in Poland



#### Needs addressed

The need to reduce administrative burdens for potential beneficiaries applying for support - and in many cases for the programme administration as well - prompted the introduction of simplifications in the application procedures for specific measures of the rural development programme (RDP).



#### Key elements of the approach

A number of simplifications and improvements were introduced with regard to specific RDP measures. For instance: applicants are no longer required to submit original attestations; submission of applications being done in multiple steps; on-line application platforms and; pre-filled application forms. This in turn resulted in the overall improvement in efficiency of the process including shortening of time devoted to the management of applications.



#### Lessons learnt relevant for the future

The Polish example provides useful lessons with regard to defining rationalised and proportionate requirements for applicants. The introduction of an on-line application platform and pre-filled forms, also contributed to more efficient application procedures and targeting. At the same time, careful and timely preparation of calls (in certain cases) also helped applicants to prepare their applications in a more predictable environment and plan ahead.





The Polish rural development programme (RDP) consists of 23 measures supported by a total public budget of some €17.4 billion, out of which €13.4 billion is covered by European Agricultural Fund for Rural Development (EAFRD). Axis 1 accounts for about 43% of the total public budget (with the largest element devoted to measure 121 on modernisation of agricultural holdings), whereas axes 2, 3 and 4 account for 30.9%, 20.1% and 4.5% of the total budget respectively.

institutional system of the The **RDP** management is fairly complex due to extensive delegation of tasks and multiple multidirectional links between participating institutions. The Managing Authority (MA) is Ministry of Agriculture and Rural Development (MARD), which is responsible for coordinating the RDP as a whole and for monitoring its implementation. The Paying Agency (PA) is the Agency for Restructuring and Modernisation of Agriculture (ARMA), which is responsible for the implementation individual measures and for managing field inspections and controls. Other institutions involved in the programme implementation (as implementing entities) are the Agricultural Market Agency (AMA), Foundation Assistance Programmes for Agriculture (FAPA) and voivodship self-governments (within Marshal Offices). These institutions have various delegated tasks related to specific measures both from the MA and the PA. The delegation of tasks was to ensure efficient programme management. For instance, the implementation of measures for which potential beneficiaries were local governments and other local stakeholders was delegated to voivodship self-governments. In other cases, tasks were delegated to institutions that gained relevant experience during earlier programmes.

In this articulated setting, ARMA regional and local offices, AMA, FAPA and *voivodship* self-governments are responsible for the management of the application process at various territorial levels. Within the work of these institutions a range good practices was identified that helped to reduce the administrative burden for beneficiaries and increase the overall efficiency of the application process.



<sup>&</sup>lt;sup>1</sup> LAGs have no formal rights to manage applications, they can only make suggestions for projects for financing within measure 413. However, the Marshal Offices have the freedom to not support projects proposed by LAGs.





## Reducing administrative burdens for beneficiaries

A number of simplifications and improvements have been introduced with regard to the application process of the Polish RDP measures. These improvements resulted in reduced administrative burden for beneficiaries and the public administration alike and the shortening of the time devoted to application-management.

In the past the applications for investment measures required the submission of various certificates together with the application form. According to current procedures there is no need for farmers to submit such certifications; instead it is sufficient to attach a specific statement by the farmer. This simplification was possible because the PA and other implementing entities involved in application process now have access to external databases of various regulatory organisations, where they can obtain and check the authenticity and correctness of various data and information. For instance, in the case of measure 121 there is no need to submit tax and social security certificates. Similarly, in the case of measure 321 it is not mandatory to submit the own funds' guarantee<sup>2</sup>, the certification of the Integrated Administration and Control System (IACS), business registration numbers or, territorial indicators (e.g. employment rate or water supply and sewage network density).

In the case of measure 321, a further improvement in the procedures allows beneficiaries to start public tenders before the submission of an application for support. These changes were positively assessed by the midterm evaluation of the Polish RDP since they

also allow for shortening the length of time from the submission of the application to the approval and from signing the contracts to receiving payments.



Another simplification is the submission of the application in multiple steps. In the case of certain measures (such as 121), during the first phase beneficiaries are required to submit basic information only (including name of applicant, the measure that he/she intends to apply for, and farm identification number) for pre-selection. After checking and approving the application, the programme administration asks the beneficiary for further information (including an 'application for payments'). This way the beneficiary has more time to provide the requested data, while the administration has already preliminary information about potential applicants and can therefore identify eligible projects through the pre-selection process. Usually the beneficiary can provide the requested additional information in two stages, typically having some 14 days during each phase (this period is often extended). Among others, the applicant has the possibility to

<sup>&</sup>lt;sup>2</sup> Sometimes referred to as the 'excess guarantee'.



change the project summary or financial plan once (however, the aim of the operation cannot be modified).

## Improvements in the application procedure with regard to measure 121

- Use of application forms in an active 'pdf' format (with self-updating formulas)
- Built-in information about the agricultural holding in line with IACS
- Possibility for the applicant to change some key data & information after submission
- Unified application for all investment measures

Further innovation brought in by the Polish administration with regard to the application process includes, since 2011, the introduction of an on-line application platform for measure 214. In this case, pre-filled application forms are also available to complement the on-line system. Such forms are sent to potential beneficiaries (who submitted applications

before), in order to help them to reduce the time spent on filling in administrative forms. In case of pre-filled forms, applicants still need to check the correctness and validity of information, and make any necessary changes before submission. This process can help future beneficiaries to think in advance and start to collect relevant documentation on time. Pre-filled applications are not prepared for new beneficiaries. These beneficiaries work with empty forms available through the ARMA's (and other relevant public bodies') websites.

# Stages of agri-environmental applications (measure 214) take place at the same time each year:

- Call for projects
- Check for completeness and correctness of applications
- Administrative control
- On-the-spot control & evaluation
- Financial planning
- Decision

#### Summary of simplifications in the application procedure across measures

- No need to submit specific certifications, (but statements instead); possibility for the administration to cross-check information in different electronic databases.
- Application in multiple steps, starting with the provision of basic information only for preselection.
- Flexible application management: possibility to change certain information and data after submission (once only).
- Harmonisation of applications for measure 214 with LFA and direct payment applications.
- On-line application form, filtering out a range of potential mistakes in advance.
- Pre-filled application forms for former applicants/beneficiaries.





#### Conclusions and relevant lessons

The Polish case provides good examples of practical simplifications in the application procedures. Applicants often have had to comply with complex administrative requirements, which were said to particularly demanding in the case of smallscale projects. The improvements of the Polish RDP application system proved to particularly useful in the light of the Commission's objective "to pursue simplification of the CAP implementation procedures and enhance control requirements and reduce the administrative burden for recipients of funds"3. The intent of such simplification is to ensure that policies, the mechanisms chosen to implement them and the necessary legal framework are never more complex than is necessary to effectively achieve the intended objectives.

The Polish case offers a number of valuable practices in this regard. For instance, the multiple phases of the application procedure help avoid unnecessary administrative overburden for applicants. However, the right balance in terms of required and acceptable level of information needs to be well defined, otherwise the method puts extra burden on the administration (issue faced by the national administration Poland). in Application requirements and eligibility and selection criteria also need to be in line with the nature and scope of the relevant measure. For instance, in the case of measure 321 applicants found that the preliminary administrative requirements (i.e. the need to provide building permits already at the early stages) were excessive and superfluous. The integration of electronic databases and access of the programme administration to these had a considerable positive impact in this regard.

Rationalised and proportionate requirements help to reduce administrative burden for applicants and programme administration alike, without sacrificing efficient targeting and project selection.

On-line application forms do not only save time for potential beneficiaries, but for the administration as well. For instance a welldeveloped on-line system (such as the one introduced in the case of measure 214) can help to filter out incorrect information in advance (e.g. parcel identification in line with the Land Parcel Identification System, and cross-checking information with those provided in relation to other measures). This saves time for the administration to check and correct at a later stage. However, it has to be noted that farmers are often not familiar with on-line tools and/or do not have access to internet, and therefore, submission of paper forms and the possibility to seek personal contacts and advice should be ensured at the same time.

<sup>&</sup>lt;sup>3</sup> The CAP towards 2020: Meeting the food, natural resources and territorial challenges of the future, European Commission, Brussels, 18.11.2010, COM(2010) 672 final.





On-line applications and integrated data systems can highly improve the efficiency of the application system. However, the general level of expertise and the attitude of many farmers justify the parallel maintenance of traditional forms of applications and advisory services.

With regard to certain measures (e.g. measure 121), project selection methods such as 'first comes first served' and 'random choice' of eligible applications have been applied, which caused a number of difficulties. The 'first comes first served' method resulted in applicants inventing informal strategies to avoid long queuing<sup>4</sup>. Whereas, the 'random choice' method resulted in the exclusion of good projects that were otherwise eligible. Such

<sup>4</sup> So-called 'social lists' were created and managed by trusted people who registered applicants in the actual order of coming.

methods may also have negative impacts on targeting of calls.

Both positive and negative examples in the Polish case demonstrate the relevance of timely planning, coordination and careful preparation of calls. In a number of cases (e.g. measure 121) calls and related documents were changed several times, and application documents were made available at the last minute. These factors had negative implications on the quality of applications and created an uncertain environment for applicants. In other cases (e.g. measure 214) the precise and regular schedule of calls and of the assessment applications created a environment. This helped applicants to plan ahead and have more time to prepare applications. The predictable nature of the application procedure has also contributed to the harmonisation of 214 applications with LFA and direct payment applications.

Finally, delegation of implementing tasks to the most competent institutions and/or those located closest to beneficiaries can contribute to better targeting and more efficient application procedures. However, based on the Polish experience, certain preconditions have to be realised. One is ensuring early accreditation of the public bodies involved (in particular the PA) in order to avoid delays in organising calls and processing applications. A second condition is the clear division of roles and responsibilities among the organisations involved.

Careful and timely preparation of calls helps to reduce the burden for both applicants and the programme administration, because they can work in a more predictable environment and plan ahead.







Information included in this fiche is primarily coming from the case studies carried out within the ENRD Thematic Working Group 4 "Delivery of EU rural development policy". The fiche is compiled by the Contact Point on the basis of the information collected in the EU Member States and Regions and takes into account views expressed at the European, national and regional level. This notwithstanding, the content does not necessarily reflect the official position of the EU institutions and national authorities.