

Simplifying the implementation of promotion programmes: Feedback on Implementing Regulation (EU) 2015/1831

The **Association of European Regions for Products of Origin (AREPO)** brings together 35 European regions and more than 850 associations of producers for over 60% of European GIs. AREPO aims to promote and defend the interests of producers and consumers in European regions committed to promoting quality agri-food products.

This document gathers observations and suggestions from AREPO members coming from different EU Member States, regarding the revision of Implementing Regulation (EU) 2015/1831. The insights stem from practical experience with promotional programmes (especially SIMPLE ones), as well as from recent field and financial audits.

1. REPORTING

- ▶ Periodic financial and technical report relating to interim payments (Art 14) and Final interim report and final report (Art 15)

We suggest to **provide a thresholds for changes that require an amendment**. The current provisions are too vague and do not reflect the reality that these promotional programmes are often designed up to three years before implementation. A certain degree of **flexibility**—provided the overall strategy remains consistent—should be explicitly regulated.

It is particularly important to adapt and clearly define the financial and technical reports required for both intermediate payments and the final balance, in line with the new lump sum justification model introduced in Delegated Regulation 2025/70. While Articles 14 and 15 of Implementing Regulation (EU) 2015/1831 refer to these reports, they are still tied to the requirements outlined in Article 4 of Delegated Regulation (EU) 2015/1829, which are based on traditional justification methods (i.e. the submission of invoices and detailed documentation for each eligible cost).

However, under the revised rules introduced by Delegated Regulation 2025/70, some of these documentation requirements are no longer mandatory when the lump sum approach is chosen. Therefore, **it is essential to clarify which criteria will be used to verify the actual implementation of activities and assess their degree of completion**.

2. STUDY EVALUATING THE RESULTS (ART 15)

We believe it is essential to request that the European Commission or the REA provide a **common and standardized guide** for the justification of expenses and the evaluation of SIMPLE projects—similar to what already exists for MULTI programmes. Such a guide would help harmonize and simplify the control procedures across all Member States, while also offering greater legal certainty to public authorities in the exercise of their delegated responsibilities. Additionally, it would help prevent issues during project reviews and ensure a more consistent interpretation of requirements.

3. NOTIFICATIONS TO THE COMMISSION (ART 21)

4. INDICATORS (ART 22 AND ANNEX – INDICATIVE LIST OF OUTPUT, RESULT AND IMPACT INDICATORS)

The Article appears to be too general. In practice, this aspect is often examined in detail by the European Commission during the final reporting phase. For this reason, it would be highly beneficial to introduce

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clear guidelines or standard references on the key indicators to be used, ensuring consistency and clarity across all projects.

Regarding deliverables, the current requirement for submitting all reports by the end of the campaign year (e.g., December 31st) is often impractical. Many activities take place in the final weeks or even days of the year, making it difficult to gather and compile all the necessary data in time. This challenge also applies to the evaluation report, which typically depends on the completion and analysis of the activity reports. As a result, additional time should be allowed for both the implementing and evaluation bodies to ensure accurate and complete documentation.

5. ADVANCE PAYMENT AND SECURITY REQUIREMENT (ART 13)

6. 90-DAY DEADLINE FOR THE CONCLUSION OF CONTRACTS FOR SIMPLE PROGRAMMES (ART 10)

Three months may represent a critical issue, as the negotiation timelines for certain activities (e.g. trade fairs, events) can be too tight. Therefore, we suggest considering extending the period to 180 days.

7. OTHER COMMENTS

- ▶ In the case of MULTI programmes, it is not clearly specified whether the selection of the verification body requires a public tender procedure. Clarification on this point would be helpful to ensure compliance with procurement rules.
- ▶ For projects that require certain activities to begin before the official start date (e.g., booking exhibition spaces), there are currently no provisions indicating whether such actions are allowed, and if so, under what conditions they should be carried out. Clear guidance on this matter is needed to avoid uncertainty and potential non-compliance.
- ▶ **Administrative Burden and Legal Insecurity:** There is growing concern among Spanish stakeholders about surrounding the management of SIMPLE programmes. Many beneficiaries are beginning to view the administrative process for SIMPLE programmes as excessively burdensome, compounded by legal, administrative, and economic uncertainties. Implementing bodies are also questioning the viability of managing such programmes.

The overwhelming volume of evidence and documentation required for justification demands extensive work hours, seriously threatening the profitability of these programmes. In recent years, the approach adopted by FEGA (Spain) in verifying annual reports and conducting on-site inspections has caused significant economic and structural difficulties for beneficiaries. These stakeholders are experiencing serious legal and financial uncertainties that, in some cases, threaten their stability.

As a result, fewer agencies are participating in tenders and potential beneficiaries are discouraged from applying for these funds.

It is important to remember that these are living programmes, often approved by the European Commission well in advance, and naturally evolve in response to market conditions and changing circumstances. Therefore, any new situations that arise must be met with appropriate and flexible justification mechanisms.

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