Introduction: Template for tools for all types of interventions

5.3.9 Tool for LEADER

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I. Presentation of the LEADER intervention

1. Common elements to all types of interventions

1.1. Legal references

Article 2 SPR on applicability of CLLD related rules of CPR[1] to EAFRD

Article 71 SPR on support for Cooperation type of intervention

Articles 29-34 CPR on Community-led local development and the relating recital 31

Article 73(2) SPR on selection of operations

Article 42(3) HZR on advance payments

Article 86(1) SPR on minimum financial allocations

Article 9 SPR on respect of Charter of Fundamental rights of the EU

Art. 150 SPR on eligibility for multi-funds local development strategies

1.2. Rationale

Individual, often fragmented interventions designed by Managing Authorities are not sufficient to address the many complex challenges that local communities face in a rapidly changing world. An integrated, place-based policy response allowing for rapid adjustments is thus needed to ensure the well-being of rural people across the three dimensions of sustainable development[2].

The LEADER method bridges this gap by working around 7 principles. They have been identified at the end of the LEADER I Commission Initiative and systematically taken up in the provisions setting out LEADER/CLLD support in the subsequent programming periods[3]:

- public-private partnership (forming and running so-called Local Action Groups or LAG)
- territorial approach based on subregional areas,
- integrated local development strategy,
- bottom-up management,
- cooperation,

[1] Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy (hereafter referred to as CPR)

[2] Environmental, economic and social.

[3] For the period 2021-2027 those principles have been translated into obligatory CLLD elements set out in Article 31(2) of CPR.

- networking
- innovation in the local context

In addition, thanks to the linkages between implemented actions[4] it allows to achieve synergies and increase the impact of individual projects, resulting in real change to the area. Finally, the focus on building social capital creates favourable conditions for hard investments to bring their full benefit. LEADER has thus the potential to enhance other CAP interventions. Over the last 30 years it has proved to be a powerful governance and territorial development instrument. So much so that all European Structural and Investment Funds can support LEADER like actions in the form of Community-led local development (CLLD). Even though the main principles remained unchanged in the last 30 years, their actual delivery has been challenging at times as the number of LAGs have grown exponentially and their position in the rural development policy have evolved over the years. A survey of LAGs[5] (self-assessment) across the Member States (2017) conducted by the ENRD illustrates this. Therefore, the main role for the CAP Plans in 2023-2027 is to primarily ensure that **all** the Local Action Groups (LAGs) have an enabling environment to be actually set up and perform according to these principles.

The main added value of LEADER method is to improve social capital in a local area, improve governance and enhance policy results and impacts as compared to the implementation without the LEADER method[6]. This added value needs to be targeted and highlighted.

1.3. What's new in comparison to the period 2014-2020?

Formally, LEADER in terms of the implementation mechanism is no longer a separate measure in the EU regulation as it has been put under the roof of the cooperation type of intervention (cf. tool 5.3.7). This shift does not entail any substantial change to the scope of support compared to the period 2014-20, since Member State will have to design a specific intervention (or several specific interventions) for LEADER due to the specific eligibility conditions.

The most important changes for LEADER stem from the New Delivery Model and the flexibility it offers to the Member States in designing their interventions, as well as their control and penalties systems. This should allow the authorities to define a specific delivery system for LEADER, which is supportive of the objectives set for the instrument as well as coherent with the LEADER method and related specific features of LEADER projects (e.g. small scale, bottom-up, community oriented).

Other changes stemming from the CAP legislation include the possibility to pay and declare advances for all types of support paid under LEADER, not only for running costs and animation, and investment projects as is currently the case. No guarantee is required anymore.

[4] LEADER is an acronym of the French full name of the method: *Liaisons entre actions de développement de l'économie rurale* (Eng. Links between actions for the development of rural economy).

[5] https://enrd.ec.europa.eu/leader-clld/leader-lag-implementation-survey-2017_en

[6] Guidelines: Evaluation of LEADER/CLLD, EU Rural Development Evaluation Network (2017) https://enrd.ec.europa.eu/evaluation/publications/evaluation-leaderclld_en

It is to be noted that support to the business start-up of non-agricultural activities in rural areas through the national CAP Plan could be eligible under Article 69 SPR only if related to the local development strategies. This support would be different from the support under Art. 71 of SPR and therefore, does not count against the minimum spending allocation on LEADER CLLD as set out in SPR. Such minimum allocation should be dedicated to LEADER strategies themselves and the support for their preparation. In conclusion, support for non-agricultural activities in rural areas under Article 69 can only be included in the CAP Plan after the the strategies are selected, provided they include such needs for start-aids to non-agricultural activities (see also Tool on art. 69).

Similarly the investments in large scale infrastructure except for broadband and flood or coastal protection under Art. 68(3) (g) under the CAP Plan could be eligible if they are part of LEADER CLLD local development strategies (except when support is provided through financial instruments).

Financial instrument support can be programmed with separate sub-budget, also in the future, for viable final recipient projects under the LEADER intervention.[7]

There are no detailed provisions on cooperation mirroring the current Art. 44 of Regulation (EU) 1305/2013. This gives LAGs more freedom in choosing their cooperation partners.

Support under Art. 43 of Regulation (EU) 1305/2013 for start-up kit, limited to capacity building and pilot projects, has also been dropped.

The provisions of the CPR relating to CLLD will continue to apply fully to LEADER supported by EAFRD through a reference in Article 2 of Strategic Plan Regulation.

The possibility for Managing Authorities to select cooperation projects under Article 34(5) of Regulation (EU) 1303/2013 does not exist in the new CPR Regulation. The selection of all types of projects will thus be exclusively the LAGs' responsibility. This should allow to better target support to the objectives of the strategy and facilitate coordination of projects with partners from other areas.

Several changes have been introduced with regard to management of multi-funded CLLD, involving support of the strategies by several Funds. General requirements for coordination between contributing Funds and Managing Authorities involved have now been replaced by the obligation set out in Art. 32(2) CPR to carry out a joint call for the selection of local development strategies and to set up a joint committee to monitor their implementation. This should ensure that LAGs applying for support for their local development strategy under several Funds participate in one common call organised by all the Managing Authorities concerned. The latter issue a joint decision approving the strategy including the allocation from each Fund and programme concerned (cf. Art. 32(4) CPR).). The need to reinforce coordination and facilitate the use of the 'Lead Fund' approach is also reflected in Recital 32 of CPR.

The deadline for a first selection round of strategies has been changed from 2 years after the approval of the Partnership Agreement to 1 year following the adoption of the last programme involved in the strategy (cf. Art. 32(3) CPR). In addition, the LAGs will have to be able to fulfil their tasks by the time. Not only must the strategy be selected but the LAGs themselves must also be

[7] It is also possible to provide FI support to projects receiving grant support under LEADER, when the FI is programmed and financed directly under other types of interventions, e.g. Investments. In both cases, cumulation of grant and FI support should also respect the aid intensity/support rate applicable to the final recipient project.

"contracted", and the IT system and all necessary administrative procedures to implement CLLD will have to be in place as well. There is no longer any deadline for further selection rounds. The EAFRD should be able to participate in the first calls for multi-fund ESIF strategies still before 2023 (start of the CAP Plan eligibility period) based on the derogation set out in Art. 150 SPR.

The current lead fund option allowing one Fund to cover all preparatory support, management and animation costs related to a multi-funded strategy has been maintained. However, the "lead fund" label has been assigned to a new mechanism that should further simplify implementation of multi-funded strategies (cf. Art. 31(3)-(6)). It allows the involved Managing Authorities to choose a lead fund whose management and verification rules would apply to all operations implemented under the multi-funded strategy no matter the contributing fund. The eligibility rules and monitoring data to be collected would remain, nevertheless, Fund specific. (cf. Q&A on Lead Fund option on CIRCA).

Some provisions have been streamlined. The requirements of Article 32(2)(b) of Regulation (EU) 1303/2013 that in the LAG decision-making body no interest group represents more than 49% of the voting rights and Article 34(3)(b) stipulating that at least 50% of votes in each project selection is cast by partners which are not public authorities are now replaced by a general rule set out in Article 31(3)(b) CPR. The LAGs must still ensure that no single interest group controls selection decisions. The provision also implicitly refers to public authorities.

Last but not least, the objectives for CLLD are spelled out in recital 24 of the CPR proposal focusing on the essential contribution of the instrument, i.e. capacity building, innovative approach in the local context and enabling structural changes in the area.

Although not a legal change, it is worth mentioning that the LEADER intervention lends itself to support the new smart villages ambition of the CAP (see also 2.3 of the tool).

1.4. Related specific objectives, output and result indicators

1.4.1 Specific objectives (CAP plan chapters 5.1.b.2 – 5.1.b.5) [Articles 6 and 97, 99(c) of the SPR]

Refer to specific fiches for specific objectives (fiches 2.2.1 to 2.2.9)

Given the local and integrated nature of the instrument and its rural area-based orientation, but also in order to allow the LAGs sufficient freedom in the definition of their strategic objectives, LEADER could be initially linked with the Specific Objective 8 defined in SPR Art. 6 (1) (h) at programming level. Since the SO explicitly refers to rural areas, LEADER support should target the needs of the latter. It does not prevent, however, funding operations located outside rural areas, included by project holders not established in a rural area, on the condition they are designed for the benefit of rural population or area.

The individual strategies can potentially cover all 9 specific objectives of the CAP set out in article 6(1).As regards the definition of rural areas, please refer to the [Tool SO 8 HYPERLINK] Initially attributed to the SO 8 in the CAP Plan, the intervention (preparation/implementation) will be

updated in the CAP Plan in line with the SOs actually taken up by the individual strategies defined in a bottom up manner.

The Member States may target the local development strategies to areas where the LEADER/CLLD approach may bring highest added value and taking account of the EU strategies, complementarities with other CAP interventions, needs assessment and other considerations. In any case a sufficient scope should be left for LAGs to design their strategies in line with local needs.

1.4.2 Output indicators [Article 7, Annex I of the SPR]

The output indicator to be used for LEADER is O. 27 Number of local development strategies (LDS). It consists of two sub-sets:

- number of LDS prepared (supported under Art. 34(1)(a) CPR); and
- number of LDS implemented (supported under Art. 34(1)(b) - (c) CPR).

Since each subset relates to a different scope of aid and unit amount, they will have to be reported as two separate values. For further information on methodology see output indicator fiche O.27 Number of local development strategies (LEADER).

1.4.3 Result indicators (5.1.b.3) [Articles 7, 97 and Annex I of the SPR]

LEADER can potentially contribute to a number of result indicators depending on the scope of approved LDSs. The most likely ones are:

- R.37 New jobs in supported projects
- R. 40 Smart transition of the rural economy: Number of supported smart-village strategies
- R. 41 Connecting rural Europe: Share of rural population benefitting from improved access to services and infrastructure through CAP support
- R. 42 Promoting social inclusion: Number of persons covered by supported social inclusion projects

In the CAP Plan, the LEADER intervention should be related to at least one result indicator able to capture most of its planned contribution towards the CAP Objectives. Given the integrated, multi-sector scope of LEADER, it is most likely the instrument will be oriented towards all three dimensions of sustainable development. If that is the case, it could be linked with at least one social, one economic and one environment / climate related result indicator.

- Points of attention: Due to its bottom-up nature, it is very difficult to anticipate the results of LEADER before the LDS have been selected. Member States cannot plan what LDS will actually contribute to and to what extent.

  To address this issue a two-step approach has been proposed for setting results and targets for LEADER:

  i. in the programming stage the MS link LEADER to one RI related to the SO 8 which LEADER would always contribute to. It should be an indicator reflecting the ambition set for the instrument with a value which the MS can plan for;

  ii. after the LDS are selected, the MS amends the CAP Plan based on the content of the LDS, assigns other RI to which LEADER is expected to contribute, and adjusts

targets and milestones for those RI to take the expected LEADER contributions into account.

See also indicator fiches and the cover note on general reporting principles presented to the member states

- Good practice: MS may prepare a short list of (3-5) indicators for their LAGs. Submitted strategies should indicate planned contributions to the chosen locally relevant indicators from the list and quantified targets. The targets should be set by the LAGs in a realistic way. By no means should the scope of the strategy be limited to projects that directly contribute to their achievement. Such indicators could be developed for example for environmental, climate change, biodiversity objectives for actions going beyond farming.
- Good practice: MA are encouraged to agree with LAGs on some additional RI which would help capture LEADER impacts in terms of improvement of social capital, local governance or better results and projects compared with non LEADER delivery . Those indicators could be precious to get the LAG's focus right and evaluate LEADER achievements ex-post.
- Bad practice: A top-down definition of result indicators and targets for each LDS is not compatible with the exclusive task of the LAGs to define LDS objectives based on local needs and assets and set related targets. Such approach should not be accepted.

1.5. Description of the type of intervention

1.5.1 Status (voluntary/mandatory for MS)

Support to LEADER is mandatory. According to SPR Article 86(1) at least 5% of the total EAFRD contribution to the CAP SP shall be reserved for LEADER. In the case of regionalised MS, this could lead to some regions using less then 5% of their EAFRD allocation.

1.5.2 Form/rate of the support, Art. 99(g), (i)

Duration of support

LEADER support can be granted for the whole implementation period of the CAP Plan.

Rate of support

There are no limitations to support rate of projects under LEADER. It is up to the Member States to set the maximum rate(s) in the Plan, leaving it to the LAGs to fix the final support rate within this limit however the Member States shall ensure that implemented operations which consist of investments comply with the relevant Union rules and requirements under the type of intervention for investments (as laid down in Article 68(4b) of SPR).

In the case of FI support, it is the Gross Grant Equivalent of the support that needs to be taken into account for respecting the aid intensity applicable on the level of the final recipient project.

Form of payment

MS may use grants and financial instruments (see Financial Instruments toolkit LINK) to support beneficiaries. Grants may take the form of reimbursement of costs incurred or simplified cost options (SCO) based on SPR Article 77.

The MS should specify the forms of payment used on the strategy level and below (individual operations) as well as the possibility to pay advances.

In case of reimbursement of costs incurred, when the MS decide to lower aid intensity thresholds below the maximum EU rates, the CAP Plan should specify the maximum applicable rates to be respected by the LAGs when setting the actual rate of support.

Where the use of SCO is planned, it is sufficient if the MS indicate their type together with relating costs covered, as well as the legal basis defining the way to establish them (cf. Article 77(2) SPR)

- Points of attention: According to the Article 34(2) CPR the support for management, monitoring and evaluation of the strategy and its animation should not exceed 25% of the total public contribution to the strategy. MS should carefully analyse historical records linked to this category of costs (including effects of scale, animation role of the LAG requiring adequate resources, etc.) and not put unnecessary pressure on the LAGs by setting an unrealistically low threshold.
- Member State can decide to apply the same support rates for grants and financial instruments on the level of the supported projects, or they can define a different support rate applicable to financial instrument support, or to the combination of grant and financial instrument support.
- Good practice: The use of SCO should be encouraged as it considerably simplifies the implementation of LEADER. It has been used for all types of support e.g. preparation of LDS (lump sum), reimbursement of running costs and animation (flat rates with intermediary payments in-built), preparation of cooperation projects (lump sum), and local projects (lump sums established by LAGs based on draft budget).
- Off-the-shelf SCO set out in the Common Provisions Regulation may be useful for personnel and indirect costs.
- For the current period, material presenting SCO use in LEADER, including concrete examples and recommendations, is available on the ENRD (European Network for Rural Development) website: https://enrd.ec.europa.eu/news-events/events/enrd-workshop-simplified-cost-options-experience-gained-and-new-opportunities_en

  https://enrd.ec.europa.eu/news-events/events/enrd-workshop-simplified-cost-options-leaderclld_en

  https://enrd.ec.europa.eu/publications/leader-simplification-lag-administrative-costs_en

  Since the types of SCOs and definition of ways to set them up in the future are broadly based on the current CPR provisions, most of the material can be helpful for preparing CAP Strategic Plans. Especially the methodological part of it and currently used examples should be still relevant for the future except for the legal references. On the other side, information on the control requirements will mostly be dated and will thus have to be adapted to the new delivery model.

1.5.3 Eligibility conditions, definitions and requirements (5.1.b.4 – 5.1.b.5) [articles 98(a), 99(c) and (d) of the SPR]

Article 34(1) CPR sets out the types of support for LEADER Member States should offer in their CAP Plans:

(1) Capacity building and preparatory actions supporting the design and future implementation of the strategies;
(2) Implementation of operations, including cooperation activities and their preparation;
(3) The management, monitoring and evaluation of the strategy and its animation.

Given differences in scope (e.g. beneficiary, amounts involved, purpose) between support covered under (1) and (2) & (3), it is recommended to treat preparatory support (1) as a separate intervention from the implementation, management, monitoring, evaluation and animation cost. Support under (2) and (3) can be consistently described in the same intervention.

There are two sets of basic EU requirements that Member States should follow as regards LEADER support throughout the implementation of the instrument:

- Provisions relating to the CLLD method set out for all the Funds in the CPR (cf. Article 31 CPR on the features of CLLD, Article 32 on CLLD strategies, Article 33 on Local Action Groups, and Article 34 on the scope of support for CLLD). Eligibility conditions stemming from the CAP legal framework applicable to LEADER, notably those set out in Article 71 on Cooperation. The requirement of Article 71(2) SPR for cooperation to involve at least two actors is implicitly fulfilled in the case of LEADER in so far as it is always implemented by a public-private sector partnership involving several actors.
- The aid for capacity building and preparation of LDS is linked to the submission of the LDS, not its successful selection.
- Support in the form of financial instruments can be planned in a separate intervention or under the same intervention, and type of support or general eligibility rules for final recipients should be defined separately or together with grants.

Member States are expected to indicate in their CAP Plan how the basic requirements relating to the method will be ensured as set out in Art. 31 of CPR. These requirements, explained below, are obligatory to all LAGs:

Focus on subregional areas (Art. 31(2a) of CPR)

The intervention should described how the territorial approach principle will be put in practice.

The territorial approach means that the Local Development Strategies cover a subregional level. The Member States are invited to define what it means in their context, for example in terms of population covered or other elements related to the territorial borders and capacity for development.

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This intervention will also refer to the definition of local areas covered such as a definition of rural areas (cross link to SO 8 in CAP Plan) and urban areas (such as small towns etc) functionally linked with them. EAFRD can finance projects both in rural and urban areas, but projects in urban areas should clearly demonstrate that they benefit rural areas

Good practice:

- Past experience suggests that for best results a local territory covered by LEADER CLLD should be coherent in geographical, social, economic or cultural terms and with sufficient critical mass. The territory could cover areas beyond administrative boundaries of single units (municipalities), which could be encouraged because it provides a clear added value in relation to the local administration.
- When exploring rural-urban linkages, for example including small towns, attention is needed to avoid any bias in funding allocation as urban areas could have a tendency to attract capital easier due to agglomeration economies or higher political weighting.

Partnership principle and the quality of partnership: development led by local action groups composed of representatives of public and private local socio-economic interests, (Art. 31(2.b) of CPR)

This intervention should describe how the partnership principle will be put in practice with no single interest group to control the decision-making.

Partnership means a true involvement of public, private, and NGOs, including young people, women, marginalised groups etc. in the decision making at all stages of local development design and implementation of the Local Development Strategy.

Points of attention based on past experience:

- Ensure that the public sector has an adequate role and does not dominates the decision process;
- Pay attention to the engagement of partners in the implementation of the local development strategy, notably project selection, strategy monitoring and evaluation (not only in conception);
- Try to keep the decision making body in the LAG as representative of the area as possible and encourage mobility in the board of directors;
- Keep the LAG partnership open to avoid a small group of powerful actors controlling the decisions. Ensure that the partnership covers a wide spectrum of local society, incl. women, young people, environmental NGOs, enterprises, etc.

The above points can be addressed by implementing procedures or soft actions (codes of practices, quality processes, LAG's communication practices, trainings etc) – the CAP Plan could briefly refer to them.

MS will also need to demonstrate, according to Article 9 of SPR, that the design of the intervention is in line with the Charter of the Fundamental Rights and the general principles of Union law. They will need to ensure that LAGs will have the obligation to respect also those general principles. LEADER is a highly relevant instrument in that respect, and is expected to respect high standards as regards non-discrimination, for example against minorities, migrants, children, elderly, disabled or women. In case of misbalances in the territory, it may be encouraged to propose targeted supporting actions.

Integrated strategies (Art. 31 (2. c) of CPR)

The intervention should demonstrate how integrated strategies will be designed, selected and actually implemented by all the Local Action Groups in a given member state. The content of Local Development Strategies is defined in Art. 32 of CPR.

Important points:

- The term "integrated" means that the strategy would cover multiple sectors and will create and explore connections between multiple sectors, actors and projects. The Local Action Groups explore, strengthen and create linkages between sectors and actors in their territory. These linkages are at the backbone of the LEADER approach and its added value. The member states shall describe how to ensure that all the LAGs would implement the integrated approach, for example by referring to the design and assessment of the Local Development Strategies, definition of project calls, project selection criteria and training and animation efforts.
- The Member States may target the local development strategies to areas where the LEADER/CLLD approach may bring highest added value and taking account of the EU strategies, complementarities with other CAP interventions, needs assessment and other considerations. At any case a sufficient scope should be left for LAGs to decide their strategies in line with local needs.
- Bad practice: By no means should LAGs be limited to implement other types of interventions defined in the SPR. In case they decide to support operations similar to those available under the other interventions, their scope should be defined by the LAGs based on the local strategy and must not be squeezed into the eligibility conditions of the standard CAP support.
- Good practice: If a separate intervention is designed to support Smart Villages, LEADER LAGs may be encouraged to get involved in its delivery. Any targeted animation of villages going beyond standard strategy animation may require additional resources. MS should make them available to the LAGs, if the latter specific involvement is expected in this respect (see also section 2.3 below).

Networking and cooperation with other territorial actions (Art. 31(2 c) of CPR)

The intervention should describe how networking of LAGs will be organised at the regional, national and EU level and how the Member State will ensure that all LAGs in its territory will participate.

The member states also explain how all LAGs from its territory propose and participate in cooperation projects at the regional, national and EU level.

Good practice:

- It is particularly important to ensure that all the LAGs regularly take part in networking and cooperation at the national and/or EU level. Evaluations show that networking and cooperation is conducive to innovations.
- Cooperation projects at the EU level also can have high added value in terms of bringing the EU closer to citizen. When needed, the MA or National Network should provide support to encourage all LAGs to participate.

Innovation in the local context (Art. 31(2 c) of CPR)

The intervention should describe how innovation in the local context will be encouraged by each LAG in the member state.

The description could briefly mention scope of projects, selection criteria, linkages with Smart Village approaches or other innovation networks, regular animation, capacity building and networking for LAGs, etc.

Points of attention/good practice:

- The enabling context for innovation could be by animation of the territory by LAGs, bringing ideas from community members, cooperation with other territories, networking, training and competence building, linkages with the European Innovation Partnerships (EIPs), innovation brokers, research and technological innovators, and other sources;
- Inclusion of Smart Village approaches can also be conducive to innovation (social innovation, digital, green economy, etc) and needs to be encouraged. The Long Term Vision for Rural Areas for 2040[8] also provides for research and innovation for rural communities and more networking around LEADER and Smart Villages approaches.
- LAGs need to have sufficient resources (incl. human capital, administrative time, etc) to perform animation and encourage innovation. Excessive administrative burden on LAGs needs to be avoided;
- LAGs and their staff needs to take part in training and networking regularly;
- Innovation also means risk taking and, sometimes, a failure. Therefore, the delivery mechanism (incl. control systems) needs to be adopted for this.
- Innovation could involve projects, whose scope is outside the standard mainstream interventions so this option needs to be open to LAGs.

General points on quality of LEADER implementation:

- Successful implementation of LEADER starts with understanding both the method and the objectives set for the tool, both at EU and MS level. Support included under Article 28(1)(a)

[8] "A long-term Vision for the EU's Rural Areas - Towards stronger, connected, resilient and prosperous rural areas by 2040" (COM 2021/345).

CPR enables any kind of awareness raising, training or coaching necessary to get all the stakeholders on the same page.

- Continuity of LAG work is crucial for the efficiency of development work. Gaps in functioning of LAGs lead to the loss of impetus in the people's involvement, but also of the skilled LAG employees who cannot afford longer breaks between contracts. The preparatory support allows for the funding of management and animation costs of partnerships preparing new strategies. N.B. Ensuring continuity of support for LEADER does not mean automatic prolongation of the "old" LAG structures. Selection and approval of new strategies is a good moment for the partnerships to revise their membership and enable new partners to join. In particular, possibility of using new Funds in the strategy should give raise to extending the partnership to representative interest groups reflecting the scope of the funding source (e.g. representatives of minority groups, NGOs working with youth, environmental associations, farmers, fishermen, etc.).

- Whilst the objective should be to support high quality LDS and partnerships, respecting as a minimum the conditions set out in art. 31 and 32 CPR, Member States may decide to adopt an iterative approach towards selection, i.e.weaker partnerships that do not meet the standards set in the call could get support and guidance from the MA to improve their strategies until they reach the minimum standards required.

Eligibility conditions and approach to selection of local development strategies

For the intervention(s) related to preparatory actions, eligibility conditions should be described which are related to the recipient of support, area, etc. Principles of selection should also be provided which can already link to the criteria relevant to the intervention for LAG/LDS selection.

For the intervention(s) related to the implementation of local development strategies, the list of conditions should be based on Art. 31 of CPR (as above). Content of the local development strategies is given in Art. 32 of CPR. The Managing Authorities should also define the criteria for the selection of these strategies (Art. 32 CPR). The approach to the selection shall be explained in the CAP Plan.

As regards the eligibility of operations within Local Development Strategies:

Points of attention:

- The Commission proposal does not put any restriction on the eligibility of local operations implemented under LEADER LDS however the Member States shall ensure that implemented operations which consist of investments comply with the relevant Union rules and requirements under the type of intervention for investments (as laid down in Article 77(4b) of SPR).
- Member States may also define additional eligibility conditions in their CAP Strategic Plans to target the support through this instrument to their specific needs. Those additional conditions must be consistent with EU requirements and CAP objectives set out in article 6 SPR. In addition, they have to be justified and enable the achievement of the CLLD objectives.
- MS are advised to leave flexibility to the LAG when it comes to setting the eligibility of operations for final beneficiaries to be funded under the LDS. If justified (e.g. based on risk assessment), any CAP Plan limitations going beyond the EU requirements should be defined via a close list of negative eligibility costs.

- MS may also define a broad scope for Local Development Strategies, outlining priority areas with highest added value from the LEADER/CLLD approach, such as for example: digital transformation, climate change, green transition, cooperation, social inclusion, etc.
- Good practice: given the importance of the LAG's animation work for a successful implementation of LEADER, it should be ensured that enough resources are dedicated to it. Good practice includes allocating minimum staff to animation, and defining indicators which reflect its results. The actual resources dedicated to animation will have to take into account the number of population covered and the size of the area in order to enable the animator the necessary proximity to and familiarity with the inhabitants.

1.6. Planned annual outputs (5) [article 99(f) of the SPR]

Member States are expected to indicate the planned number of strategies for which preparatory support will be paid and the planned number of strategies which will be implemented.

Due to the annuality of the planning under the CAP Plan for all types of interventions, this planned number of LDS is – in principle - to be indicated for each year of the CAP Plan. In order to agree on the way to plan the number of LDS on a yearly basis, it was proposed under the financial plan that this number should be provided in the year during which LDS are expected to receive their first payments (see also tool on Financial Plan) and only in that year. For the other years the value of the planned output would be 0.

- Points of attention: The planned number of strategies is not binding. The annual budget planned for each year will also have to be indicated in the CAP SP but it will not be binding either.

1.7. Planned annual (uniform or average) unit amounts (5) [Articles 89 and 99(g) of the SPR]

The planned unit amount will correspond to the average support for preparation of strategies or the average LDS budget.

The variety of budgets that can be allocated to a local development strategy justifies the use of average unit amounts for both sub-sets of output indicators under LEADER.

- Member States with regional programmes, where wide range of budgets per strategy results in big variations in unit amounts, may find it practical to establish separate planned outputs and separate unit amounts per region (corresponding to the average LDS budget in the region) (cf. Art. 99(f) and Art. 100(2)(f) SPR proposal.
- The minimum recommended strategy budget per LAG is 2.500.000 EUR.
- In the case of the use of financial instruments for viable final recipient projects under LEADER strategies, separate unit amounts need to be defined for the FI for clearance and monitoring purposes.

1.8. WTO aspects (5.1.j) [Articles 10 and 99(e), annex II of the SPR, Article 33 of the SPR]

The SPR placed LEADER under the cooperation type of intervention and as such, it should fulfil the same WTO Green Box criteria.

Cooperation interventions (including LEADER) have to respect the provisions of paragraph 2 of Annex 2 to the WTO Agreement on Agriculture (Art. 10(1) and Annex II to the SPR).

According to Article 10 of the SPR and the related Annex II, cooperation interventions have to comply with WTO Green Box criteria as specified under paragraph 2 of the Annex 2 to the WTO Agreement on Agriculture covering "general services". Therefore, while agricultural producers or processors may be paid for other services and/or work delivered in a cooperation project, they cannot receive payments directly linked to their status as such or to their production or processing activities.

Cooperation interventions may instead respect a different paragraph of Annex 2 to the WTO Agreement on Agriculture (although it is hard to imagine what other paragraph could be suitable). In any case, MS would have to provide a justification in their CAP Strategic Plans.

Please also see the specific tool X.1 on WTO aspects [hyperlink].

1.9. Consistency aspects (3.1-3.3) [Article 97(2) of the SPR]

Refer to specific tool 3.1 on overview on intervention strategy and its consistency/coherence

Cf. also the tool on the coordination, demarcation and complementarities between the EAFRD and other Union funds active in rural areas [hyperlink].

Since LEADER is a local development instrument impacting all three dimensions of sustainability, it can in fact contribute to any SO and act in different areas where other instruments are also available.

If it is targeted towards challenges which can also be addressed by other instruments, it has to bring additional value stemming from its specificity (e.g. strategic approach based on local definition of needs and objectives, taking into account available assets; flexibility in scope, integration and synergies between actions, community orientation, collective approach, simple rules for end users). Delivery mechanisms must thus support those features for the instrument to be efficient. It must also be ensured that LEADER does not merely reproduce what can be achieved under other interventions.

Since EAFRD can support Community-led local development together with Funds covered by the CPR, Member States are expected to indicate in the Plan whether such a possibility is available and with which Funds. In case multi-funded support is offered, they should explain how it will be coordinated with the other Funds. In particular, it must be clear how the scope of support will be coordinated; whether the Lead Fund option pursuant to Article 33(4) to (6) CPR will be used, and if so, which Fund will play this role; whether the possibility for one fund to cover preparatory support and management and animation costs pursuant to Article 33(3) second sentence CPR will be used, and if so, which Fund will cover this.

1.10. Simplification (8) [Article 95(h) of the SPR]

Please see the specific tool 8.2 on simplification [add hyperlink].

- 👍 Good practice: The use of simplified cost options (SCOs) should be the default option. Special attention should be paid to the possibility of using a draft budget as a method to establish an SCO on a case-by-case basis. It allows LAGs to define a specific SCO for each project based on its costs estimates. This possibility is particularly relevant in case of heterogeneous projects which could not fit into the SCOs established for standard projects and types of costs on the CAP SP level. See also: The Guidance on Simplified Cost Options [add hyperlink].
- 👍 Umbrella projects, i.e. an arrangement where LAGs are formal beneficiaries and hold the project on behalf of the community may be a useful option in cases where no other actor in the area can play this role. It can help involve groups of population otherwise difficult to reach out to (e.g. youth, marginalised groups, elderly people) and may be particularly relevant in the communities where the civil society is weak.
- ✍ Points of attention: Keeping in mind that easy access to support, proportionate controls, as well as speedy processing of grant application and its payments are *sine qua non* conditions for an efficient use of LEADER, the Member State should explain how this will be achieved and what improvements will be introduced compared to the current period.
- ✍ Control mechanisms should account for the objectives set for LEADER (e.g. stimulate innovative approaches and testing new ideas) and related risks (reduced i.a. because of its non-for-profit and public interest orientation; in-built democratic control mechanisms; and minimum EU requirements and low amounts of support involved).
- ✍ The administrative burden put on LAGs has undermined to a bigger or lesser extent their capacity to build community capacity and animate the area. The Plan should demonstrate how red tape will be reduced for LAGs, to ensure that they can focus on their core task which is animation.

1.11. Transitional aspects

In accordance with Transitional Regulation (EU) [No 2220/2020] LEADER can be supported under the current RDPs until the end of 2025 (if the Member State makes use of the possibility to extend the RDP by two years).

In addition, a specific transitional arrangement has been proposed for LEADER under Article 4 TR. It allows EAFRD to support capacity building andpreparation for local development strategies for CAP Plans post 2023.

2. Specific elements to the type of intervention

2.1. Expected added value of LEADER/CLLD approach

The main added value of the LEADER interventions is **improved social capital in a local area**, **improved governance and enhanced policy results and impacts as compared to the implementation without the LEADER method**[9]**.**

The member states will briefly describe the above as expected in 2023-27. Some definitions or ideas are listed below:

Points of attention:

The improvement of social capital[10] refers to reinforcing local networks, trust, shared values and territorial identities, and exchange and cooperation between people and organisations (within the LAGs and beyond).

Social capital is an important factor of development because it encourages people to take risks and innovate (incl economically), exchange information, respond collectively to threats and cooperate for collective goods.

In the context of LEADER, it refers to:

- creating, reinforcing and extending networks within LAG (both members of LAG and LAGs board) and beyond LAG (including direct and indirect beneficiaries of LAG projects), knowledge of LAG acivities by its members and wider public;
- actual participation of partners in LAG s meeting and quality of this participation; formal and informal relations between members; joint actions between members;
- trust between members and of wider public in the LAG;
- shared values, identities on the territories developed by LAG

LEADER/CLLD increase social capital by encouraging networks between partners, building trust and exchange of information, training especially in "soft skills" and networking, animation, as well as by projects done by LAGs (reinforcing territorial identities, social inclusion, facilitating contacts amongst community members, etc).

I**mprovement of local governance**[11] covers inter alia:

[9] Guidelines for Evaluation of LEADER/CLLD, European Evaluation Helpdesk for Rural Development (2017)

[10] The concepts of social capital and local governance and their assessment in the context of LEADER/CLLD method are extensively discussed in: E. Pisani, G. Franceschetti, L. Secco, A. Christoforou (ed), (2017) « Social capital and local development. From theory to empirics », Palgrave-McMillian. This section draws upon this research.

[11] The concepts of social capital and local governance and their assessment in the context of LEADER/CLLD method are extensively discussed in: E. Pisani, G. Franceschetti, L. Secco, A. Christoforou (ed), (2017) « Social capital and local development. From theory to empirics », Palgrave-McMillian. This section draws upon this research.

- Transparency and inclusiveness of LAGs decisions;
- Communication tools of LAGs
- Project management and monitoring (incl timing)
- Services offered by LAGs to prospective beneficiaries and wider public
- Innovation and learning by LAGs staff incl: participation in networking and cooperation projects
- Conflict management

The quality performance of LAGs such as transparent and timely procedures, regular training of staff, involvement of stakeholders, networking, services to the public, good communication etc. are indicative of good governance and could be encouraged by the MA and national networks.

Enhanced policy results and impacts (as compared to policy delivery not via LEADER method) or in other words better quality of projects implemented could be evidenced by: linkages and synergies between projects (especially a combination between enhancement of skills and physical investments, synergies between sectors and economic/environmental/social objectives), innovations, meeting the needs which would be hard to meet via mainstream policy delivery, collective projects or projects with community benefits, better sustainability, projects underpinned by animation or capacity building responding to complex policy strategies (such as climate change, biodiversity, digital transformation, Farm to Fork) or projects creating sustainable employment in rural areas, including those for legally staying third country nationals (Recital 32 SPR).

These aspects could be ensured eg via selection criteria, networking, best project exchange, targetted training of managers, production of manuals/guidelines for excellency/learning platforms/quality management tools etc.

2.2. Application of the LEADER approach through the delivery mechanism

In their intervention, the Member States should describe the delivery mechanism briefly, and in particular the respective functions of the LAGs, MA and PA as well as coordination mechanisms between them.

Some considerations:

Evaluations point out that an appropriate delivery mechanism is critical to the real implementation (or non implementation) of LEADER/CLLD method. In this section the Member States will explain how the delivery mechanism enables the application of Community led approach as provided for in Art. 31.2 of the CPR.

Practicalities of the enabling delivery mechanism for LEADER are described here:

https://enrd.ec.europa.eu/leader-clld/leader-toolkit/working-leader-delivery-system_en#two

Some core enabling determinants for the delivery system are:

- Selection criteria ensuring key principles are imbedded in the LAG/LDS development and implementation;
- LAGs need to focus on performing their exclusive tasks such as: – capacity building, selection calls for projects incl proposing project for final verification of eligibility before approval, monitoring and evalution of the strategy (Art. 33(3) of CPR)
- LAGs may perform additional tasks of intermediary bodies if they get an official delegation. Such tasks need be accompanied by appropriate resources.
- The most important task of LAG is animation and capacity building – sufficient resources must be given to LAGs to enable it.
- LAGs needs to have autonomy and conditions for risk taking and innovation (incl. controls, attitudes to errors, "innovation culture");
- Avoiding excessive administrative burden for LAGs – smooth, transparent, trustful and timely cooperation with the Paying Agency/intermediate bodies and the Managing Authority;
- Clear rules for the functioning of the partnership ensuring decision making rules pf the LAG are in line with the LEADER method
- Actual involvement of the stakeholders in the decision making processes for setting up the LDS, defining the project selection criteria and real and broad participation in project selection processes;
- Ensuring smooth financial flows (incl. co-financing, advances etc);
- Coordination mechanisms between MA/PA and LAGs are crucial to the success.

2.3. More information….

The LEADER section of the ENRD website is the main source of information on LEADER good practice: https://enrd.ec.europa.eu/leader-clld_en.

It includes methodological material, EU and ENRD Guidance, examples of good practice, and other resources related to specific LEADER ENRD events and activities. Most of the information on LEADER will be relevant for the future programming period, especially resources on the LEADER approach, recommendations on simplification and LEADER's role in tackling different challenges, as well as examples of good practice. Apart from the legal references, which will become obsolete once the new legal framework enters into force, issues stemming from the current EU control requirements and MS gold-plating will, hopefully, become irrelevant. However, the related lessons learnt can help MS to avoid similar errors when designing their own control and penalty systems in the future.

Below, you will find a selection of links which represent only a small share of the LEADER resource available on that website.

For beginners or those keen on refreshing their understanding of the LEADER approach, the LEADER Toolkit is a good starting point.

In addition, two EU guidance documents on Community-led local development, one for Managing Authorities and one for Local actors provide insights into the potential of the instrument in a multi-funded context, pre-requisites and possible approaches.

Examples of interesting practices (thematic, linked to projects, and administrative, related to delivery system) are available here.

A practical guide on Delivering CLLD effectively has been developed for EMFF Managing Authorities by FARNET for the period post-2020. Because of its practical orientation and common CPR legal basis for CLLD, the guide is a useful source of good practice transferable into any Fund supporting the approach.

Results of LAG survey carried out by the ENRD in 2017 give an indication of the strengths and weaknesses of the current LEADER implementation, pointing to findings per Member States. The analysis can be found here.

It may be worthwhile to review the Leader related analysis in Chapter 7 of AIR 2018.

Practical recommendations related to three topics where LEADER is making a difference are part of the outcomes of LEADER thematic labs:

LEADER and Smart Villages: https://enrd.ec.europa.eu/news-events/events/enrd-leader-thematic-lab-smart-villages_en

LEADER and Climate change adaptation and mitigation: https://enrd.ec.europa.eu/news-events/events/enrd-leader-thematic-lab-climate-change-mitigation-and-adaptation_en

Youth and depopulation: https://enrd.ec.europa.eu/news-events/events/enrd-leader-thematic-lab-youth-and-depopulation_en

Last but not least, material prepared for the Seminar on programming LEADER, including examples of approaches which have worked in the period 2014-2020 is saved here.

2.4. State aid aspects [Article 99(i) of the SPR] (where relevant)

Please refer to the section 2.1 of the Cooperation tool [Hyperlink].

In principle, Member States may choose between procedures (notification, block-exemption or *de minimis*) when seeking State aid clearance. However, some of them are more adapted to cover LEADER support than others. The most common form of State aid clearance for LEADER activities which do not fall under the scope of Article 42 of the TFEU is *de minimis*[12]. It allows accommodating integrated and locally defined scope of projects.

- Points of attention: Aid paid for preparatory support, as well as for running costs and animation is not considered as state aid in so far as aid recipients are non-economic

[12] The rules governing de minimis aid are set down in Commission Regulation (EU) 1407/2013 ("General *de minimis*") and Commission Regulation (EU) 1408/2013 ("Agricultural *de minimis*").

actors irrespective of their legal form, how they are financed, or if they have a for-profit focus. An activity that offers goods or services on a market is considered to be an "economic activity" and therefore involves state aid. [link to note on CIRCA Re to UK].

- A recent modification of non-agricultural state aid rules, allows projects funded from LEADER/CLLD to be exempted from the notification obligation in certain cases. (Article 19 a and 19 b of Commission Regulation EU/2021/1237 of 23 July 2021). Article 19a applies to aid for **costs incurred by SMEs participating** in LEADER/CLLD projects. The aid amount is limited to the maximum co-financing rates provided for in the Fund specific Regulations. Article 19b applies to SMEs participating in, **or benefitting from** LEADER/CLLD projects. The amount of aid granted **per project** shall not exceed EUR 200 000 for LEADER/CLLD projects
- Particular attention must be paid when clearance of LEADER is made via the agricultural state aid Guidelines[13].

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2.5. Coordination, demarcation and complementarities between EAFRD and other Union funds active in rural areas [Article 98(d)(iii) of the SPR]

Due to the very nature and purpose of local development strategies, Community-led Local Development (CLLD) forms of support should not be subject to strict demarcation criteria. A large margin of discretion should be left to Local Action Groups in choosing the most suitable instruments to support their strategies.

2.6. Miscellaneous

LEADER has a major role to play in supporting the concept of Smart Villages. In fact, if all the 7 elements of the method are applied, it creates the conditions for the development smart village initiatives and that is how many LAGs have perceived their role for years.

The objectives set for Community-led local development emphasise the role of the instrument in supporting structural change along with innovative approaches and social capital. Rural transition is also at the heart of the Smart Village idea.

Yet, a meaningful support to this transition via LEADER requires strong mandate for the LAGs and coordination with other instruments and policies. Useful recommendations in this respect can be found here.

[13] European Union Guidelines for State aid in the agricultural and forestry sectors and in rural areas 2014 to 2020. OJ C 204, 1.7.2014.

II. Guidance questions for the assessment of the interventions (belonging to the type of intervention considered)

In blue bold: general questions that should fit for all types of intervention. Below each general question: possibility to develop additional and more specific questions for a considered type of intervention

Reference in the CAP Plan template	Reference in the guidance document	Item to be assessed	Result (Y/N/NA) Comment
	1	**Section 1 - Common elements to all types of interventions**	
5		**Title of the intervention**	
		Does the title reflect sufficiently clearly the content of the intervention?	N.A.
2 &5	**1.4.1**	**Specific objective(s) to which the intervention is linked**	
		Please refer to the tools on specific objectives (2.2.1 to 2.2.9) [add the link to the tools]	
		Is the design of the intervention consistent with the SO(s) to which it contributes?	
		Is LEADER initially linked with SO 8 subject to revision in line with the bottom-up development local strategies at a later stage)	
4 &5		**Articulation with conditionality (for environmental and climate interventions)**	
		General question(s) to be developed by D2-D4-F1	N.A.
5	**1.5.4**	**Eligibility conditions and description of interventions**	
		Is the design of the intervention consistent with the features of CLLD set out in Art. 32(2) CPR? In particular is it demonstrated that the following features of the CLLD going to be implemented by all LAGs (focus on subregional level, led by partnerships, carried by strategies, supportive of innovation, networking and cooperation)? **- do LAGs have flexibility in defining adequate means to achieve objectives of their strategies without being put in a straightjacket of a closed list of eligible types of costs?** **- is the support focussed on experimentation in view of achieving objectives (and avoids pushing LAGs to "generate" common indicators thus limiting their willingness to innovate)?**	
		Do the eligibility conditions respect general principles of union law such as, equal treatment and non-discrimination, as well as the Charter of Fundamental rights of the Union?	
		Is support provided for the whole scope of CLLD as set out	

		in Art. 34(1) CPR (i.e. preparatory support, implementation of projects under the strategy, management and animation) in the CAP Plan (not necessarily as one intervention) and are relating eligibility conditions clearly set out (as in Art.31 (2)?	
		Are the eligibility conditions and approach towards selection of local development strategies explained? Do they ensure compliance of the strategies with Art. 32(1) CPR?	
		Is it clear that MS have procedures in place to ensure the requirements concerning the strategies (in particular that no single interest group controls the decision-making) and the role of the LAGs (notably that LAG represent the interest of the community, is responsible for the design and implementation of the strategy, uses a non-discriminatory and transparent selection procedure and criteria, which avoids conflict of interest and ensures that no single interest group controls selection decisions) are respected throughout implementation?	
		Do the eligibility conditions of the intervention respect the applicable legal provisions in the SPR (notably its Art. 71 and Art. 68(3) and (4)) and CPR (Art. 31-34)?	
		Is it clear when MS plan to complete the first round of selection of the strategies, including their contracting? Is that deadline in line with the requirement set in Art. 32(3) CPR?	
		Are the responsibilities for the management and control tasks clearly set out for Managing Authority, Paying Agency and LAGs? Do they respect the minimum and exclusive LAG tasks set out in Art. 32(3) CPR? - if LAGs are given additional roles of intermediary bodies, do they get resources for these functions?	
		Are the eligibility conditions consistent with the policy objective/goal of the type of intervention (where relevant)?	
		Is the scope of support unlocked from other interventions and allowing for a clear value added of LEADER?	
		Is the design of the intervention consistent with recommendations of relevant evaluations?	
		If the intervention is 'territorialised': is the territorial targeting relevant to the identified needs and intervention logic? *[please refer also to the tool X.4 on regionalisation hyperlink]*	
		If LEADER is not implemented in the whole programme area, is it clear which rural areas are targeted?	
		Are the criteria upon which the territorial targeting is based not likely to be discriminatory (i.e. unjust or prejudicial treatment of different categories of population)?	

		Is the scope of support unlocked from other interventions and allowing for a clear value added of LEADER? Is the added value of LEADER explained in terms of enhancement of social capital, better local governance and better results and projects compared with non LEADER method?	
2 &5	**1.4.3**	**Result indicator(s) to which the intervention contributes**	
		Are the RI proposed consistent with the design of the intervention and its eligibility conditions?	
		Are the RI proposed consistent with the role of LEADER in the Plan?	
5	**1.j**	**WTO requirements**	
		Please refer also to the tool X.1 on WTO aspects [hyperlink]	
		Does the intervention respect §2 of Annex 2 to the WTO Agreement on Agriculture? Is it explained how?	
5 &6	**1. 6**	**Planned annual outputs**	
		Please refer also to the tool 5.0 on what is an intervention [add the link]	
		Do the planned annual outputs fall under the relevant output indicator?	
		Are the planned outputs plausible in view of the design of the intervention and its eligibility conditions?	
5 &6	**1.7**	**Planned annual unit amount(s)**	
		Please refer also to the tool 5.0 on what is an intervention [add hyperlink]	
		Are the planned unit amounts plausible in view of the design of the intervention and its eligibility conditions?	
		Are the planned unit amounts plausible in view of implementing a viable integrated 7-year-strategy?	
		Is it clear what share of the budget allocated to the strategy will be devoted to management and animation?	
		Are the planned unit amounts consistent with the relevant planned milestones/targets?	
		Does the budget allocation to LEADER comply with the 5% minimum of the EAFRD allocation?	
		Is the budget allocation consistent with the role of LEADER in the delivery of the Plan's objectives?	
		Are advances available for LAGs and project beneficiaries?	
		Is it clear in which form (reimbursement of real costs or SCOs) the grants will be paid to beneficiaries (LAGs and final beneficiaries)?	
		Should SCOs be planned, is it clear which type of SCO will be used for which costs and what method has been used to establish them?	
5 &8	**1.10**	**Simplification**	
		Please refer also to the tool 8.2 on simplification [add hyperlink]	
		Is the intervention designed in a way that would avoid unnecessary complexities or administrative burden for	

		the beneficiaries?	
3	**1.9**	**Consistency and accumulation of support**	
		Please refer also to the tool 3.1 on intervention strategy and its consistency/coherence [add the link]	
		Is the intervention consistent/not in contradiction with other interventions?	
		Does the intervention design give grounds to expect a clear value added by LEADER compared to other interventions?	
		Is the intervention likely to create accumulation of support (i.e. overcompensation/double funding)?	
	2	**Section 2 - Items specific to a particular type of intervention**	
5.B	**2.1**	**State aid aspects (where relevant)**	
		Is the intervention respecting relevant state aid rules and requirements? Is it explained and how?	
		Multi-funded CLLD	
		In case several Funds are available to support CLLD in rural areas, is the coordination and complementarity with the other Funds described and consistent with the requirements of Art. 33(3) CPR?	
		Does the scope of support of different Funds enable implementation of multi-sector and integrated strategies and avoid risk of gaps?	
		Is the option provided under Art. 33(3) CPR for one Fund to support all preparatory, management and animation costs applied?	
		If the option above is chosen, is it clear which Fund will cover those costs?	
		Is the Lead Fund option provided under Art. 33(4) CPR applied?	
		If the Lead Fund option is chosen, is it clear which Fund will play this role?	
Ring-fencing			
		Is the minimum allocation of 5% EAFRD respected?	
		Conclusion	
		The ultimate objective of the assessment should allow acquiring sufficient certainty that design of the intervention respects all the elements of the LEADER method and enables the instrument to achieve its objectives and bring clear value added for the Plan.	

NB: the IT CAP plan template will integrate built-in checks, for example to verify the respect of the relevant ceilings or ring fencing if any.