

# Review of the implementation of EU-FAS policy in Member States of EU- France

---

This report was prepared by **Matthieu Ansaloni** (INRAE).

## I- Executive summary

In France the Ministry of Agriculture, Food and Agriculture is in charge of the implementation of European regulations on the Farm Advisory System (FAS). He has defined a procedure for the accreditation of service providers that has the originality of promoting their networking. The challenge is to encourage the emergence of networks of consulting organizations that have the skills to cover all areas of the FAS. The implementation of the scheme is of the responsibility of the regional services of the Ministry of Agriculture (DRAAF).

This study cannot in any way conclude on the effectiveness of this system, established by a first implementation circular issued in 2007. The survey protocol provided for in Work package 4 - based mainly on the study of the administrative literature (study of regulations and policy assessments) – allows us to collect very little information about this public action. The main conclusion of this study is that the information available to us suggests that, at the moment, this public action is being implemented in a very incomplete way.

To highlight this situation, this report discusses three main issues:

- The first relates to the embedding of EU regulations on FAS and the existing national policy on advisory services;
- The second refers to the weak impetus caused by the FAS on the ground;
- Finally, the last deals with the (perceived) administrative burden caused by the FAS.

## II- Extensive description of the implementation of the EU-FAS in France

This section describes how European regulations on the FAS have been translated into French law. It is mainly based on a study of the implementation circulars that were produced in France from 2007 to 2015. The advisory system (institutions and policy tools) already in place in France will be mentioned in the next section.

### A) [Introduction](#) – General overview about the EU-FAS implementation

The description of the French legal translation of the European regulations on the FAS aims at revealing the main elements of this public action, that is: its administrative borders; the identity of its agents involved (who is entitled to provide advice?); its content (substance and form of the council); its monitoring and control protocol; and finally its financing.

### B) [“Boundaries”](#) of the implementation of the EU-FAS regulation

In France, the implementation of the EU regulations on the FAS is under the authority of the Ministry of Agriculture, Food and Agriculture (MAA). Traditionally, a division of labor between "central administration" and "regional administration" organizes the action of its agents.

At the central level, in the first years of its implementation, the regulations were placed under the authority of two MAA departments: the Directorate General for Economic, European and International Policy (DGPEEI) and the Directorate General for Education and Research (DGER). Thereafter, from 2009 onwards, regulation will be the sole responsibility of the directorates that, following an administrative reorganization, succeeded the DGPEEI: the Directorate General for Agricultural, Agri-Food and Territorial Policies (DGPAAT); the Directorate General for Economic and Environmental Performance of Enterprises (DGPE).

At the level of the regional service of the MAA (*Direction Régionales de l'Agriculture, de l'Alimentation et de la Forêt* – DRAAF), the implementation of regulations is of the responsibility of the Regional Training and Development Services (SRFD). The division of administrative work tends to define the geographical boundaries of public action. This is based on an accreditation procedure, which is defined at the national level. But its implementation tends to place public action within regional borders. DRAAFs are responsible for the instruction of the application made by service providers. According to national regulations, DRAAFs also have a role to play in terms of information, which should make public the list of service providers and inform them of any changes in the regulations on cross compliance. Finally, the DRAAFs have a training role: they should organize meetings between the supplier organizations and their Plant Protection Services (*Services Régionaux de la Protection des Végétaux* – SRPV): in charge of controls under the "Health - Plant Production" area of cross compliance, they must, according to national regulations, organize "blank checks" (MAA, 2009, p. 5), so that the supplier organizations have a "better understanding of the controllers' requirements" (p. 5).

### C) “Identity” of the suppliers selected for the implementation of the EU-FAS regulation

The identity of the service providers is defined by the conditions of authorization (this one being delivered for 5 years). These are not very restrictive. The French regulations on the FAS aim to "generalize good networking practices between advisory bodies" (MAA, 2007, p. 2): by setting their networking, a leading organization gathers in the same network advisory organizations that can all together cover the scope of the FAS. In fact, the authorization does not concern the service providers, but the candidate organization responsible for leading the network (known as the inter-agency network – “*réseau inter-organismes*”).

In the first implementation circular, the application file for authorization has four main components:

- The first concerns the status of the organizations involved and the arrangements for their coordination;
- The second concerns the services offered by the organizations according to the fields concerned (specifying the number of advisers available and their main qualifications);
- The third relates to the resources of the providers (the advisers' qualifications, in particular on their field of intervention, as well as the "technical reference materials" mobilized);
- Finally the last part deals with the evaluation of the internal advisory system, which aims to generalize the development of this practice.

The second implementation circular reinforces the conditions of authorization, without making any particular modifications. However, an effort of definition should be noted: the "FAS network" is defined as a "set of advisory bodies (...) in order to aim for a better quality of service to farmers" (MAA, 2015, p. 1). By "advice", the regulation means "carrying out a diagnosis covering all or part of the FAS field and leading to recommendations or proposals for alternatives" (p. 1.). A distinction is made with regard to advisors: some, "specialized" (p. 2), work on topics falling within his field of specialization

(this being attested by his qualifications); others, "generalists" (p. 2), with "horizontal skills", provide "global advice", at the scale of the whole system, in order to encourage their conversion.

To sum up, given the scope of European regulations, the identity of service providers is loosely defined. They only must provide proof of the competences of their advisors according to their fields of intervention.

#### D) “Control” of the quality of the services implemented under the EU-FAS regulation

The regulations do not deal with the control of the quality of the services provided. While the DRAAFs are responsible for examining requests for authorization, the implementation circulars do not recommend carrying out in situ checks. The 2007 circular states that, "in the event of manifest non-compliance with the specifications, the authorization may be withdrawn" (MAA, 2007, p. 3), without indicating how the non-compliance can be established. The issue of control is largely ignored. However, the 2009 circular specifies that the authorization only applies to the organization that runs the network. The unexpected consequences of an advice are not of the responsibility of the latter, but of the providing organization participating in the network. The text states that, "as such, it is highly recommended that organizations belonging to a network authorized to hold civil liability insurance" (MAA, 2009, p. 5).

Without directly addressing the issue of quality control of the services provided, the 2015 circular sets new requirements for monitoring its activities, while the previous one, while encouraging the evaluation of practices, did not specify its aims or modalities. The text enacted in 2015 stipulates that each "network" must, at the beginning of each calendar year, transmit indicators to the DRAAF which authorized it, so that they and the MAA can monitor this public action. The indicators concern the network's activities (number of requests for agricultural advice, number of farms that have benefited from it; the types of activities by organization: collective information - press, collective information - meetings, collective advice, individual advice); finally, the types of activities according to the fields of regulation.

#### E) “Attributes” of the services implemented under the EU-FAS regulation

For both the first and second implementation periods, the regulations do not define any target audience: the FAS targets "every French farmer who so wishes" (MAA, 2009, p. 4). This public action, which is optional, concerns the professional field as a whole.

Following developments in European regulations, the scope of the FAS has been extended: from 2007 (date of promulgation of the first implementing circular) to 2015 (date of promulgation of the second implementing circular), its scope only concerned cross compliance requirements (regulatory management requirements, requirements on good agricultural and environmental condition). From 2015 (in accordance with EU Regulation 1306/2013), its scope has been extended: the circular issued the same year identified the FAS as an instrument of the "agro-ecological project" (MAA, 2015, p. 2) that the MAA issued for France in 2012. As a tool designed to "better disseminate the principles of agro-ecology", was selected, in addition to the mandatory themes, the optional themes considered in connection with this project: the promotion of farm conversions and the diversification of their economic activities, information on actions relating to climate change mitigation or adaptation, and on actions relating to biodiversity and water protection.

The definition of the content of the service that advisory organizations should provide changed between the two periods:

- The 2007 implementation circular merely listed, according to the domains ("environment" and "good agricultural and environmental condition" for example), specific information and concepts ("concept on the role and cycle of nitrogen" for the domain "environment").

The same circular also set that the advice provided, if it could take the form of individual or collective advice, had to be the subject of a "written record of advice" (MAA, 2007, p. 6);

- In the 2015 circular, the list of information and concepts according to fields has been erased, as the requirements induced by cross compliance are then said to be better known by advisory providers and farmers. On the other hand, the form of advice provided under the FAS has been specified: it is similar to a "diagnosis" (MAA, 2015, p. 3), aimed at improving the "economic and environmental performance" (p. 3) of farms. Thus, concerning practices beneficial to the climate and the environment or those concerning the maintenance of the land in agricultural condition, the advisory organization must propose to farmers "an individual or collective advisory system (diagnosis and prescriptions) (...) which can be supplemented by additional information and training services" (MA, 2015, p. 3). In addition, advice is identified as a channel for disseminating information on multiple regulations (biodiversity, pests, nitrates, climate change for instance). As in the 2007 circular, it is provided that benefits (individual or collective) are subject to a written registration that the service provider must keep for three years.

## F) “Financing” of the services implemented under the EU-FAS regulation

The implementation circulars do not address the issue of funding. This falls in the scope of the European Rural Development Regulation (measure 2, which concerns advisory services, farm management support and on-farm alternative service). As we will see, for the time being, this source of financing has not been used in France.

## III- Effectiveness of EU-FAS

The information available suggests that the implementation of the European regulations on FAS is at most partial. This section supports this proposal by observing three elements: the accreditation of service providers; the mobilization of European funds available under the Rural Development Regulation (RDR); and finally, the study of information collected under the monitoring system provided for in the French implementation circulars.

First, **the accreditation of service providers**: in 2017, an internal note of the MAA stated that "the authorizations issued to date do not allow France to have a FAS that covers the entire country" (MAA, 2017, p. 3). The implementation is incomplete and covers only 11 regions. In 5 (Auvergne-Rhône-Alpes; Centre-Val de Loire; Normandie; Occitanie; Pays de la Loire), at least one network is authorized. In two other regions (Hauts de France; New Aquitaine), requests are reportedly being processed. Finally, in the latter (Burgundy-Franche-Comté; Brittany; Grand East; Île-de-France), no applications are filed. In total, nine networks are authorized: five are coordinated by chambers of agriculture; three by a management center; one by a cooperative.

According to our information, the number of authorized service providers has since increased, under the effect of a double impetus:

- The first was given by the MAA (the DGPE precisely). Law 2018-727 of 10 August 2018 for a State at the service of a trust society (known as the "ESSOC law") redefined, initially on an experimental basis, the missions of the chambers of agriculture, entrusting them with the task of informing farmers about the regulations that are enforceable against them and the controls that can be conducted in this respect<sup>1</sup>. Anticipating the entry into force of this law, the DGPE - in order to conduct this experimentation - had encouraged the Regional

---

<sup>1</sup> Article 38, supplemented by Order 2019-59 of 30 January 2019.

Chambers of Agriculture (CRA) to obtain an accreditation under the FAS as early as 2016 (MAA, 2017). A letter - written by the Director of the Permanent Assembly of Chambers of Agriculture (APCA) - had been sent to the CRAs. As their mobilization remained low, the DGPE used financial leverage in 2018. It made the allocation of the CASDAR performance reserve (an amount of around €6,000) conditional on the CRAs being authorized in 2019. If the proceedings are ongoing, it would appear that the process has been successful;

- The second impetus was given by some DRAAFs, particularly in Occitanie. In this region, eight networks were authorized in 2018 (led by the chambers of agriculture and agricultural trade in particular). The DRAAF agents have aroused the enthusiasm of service providers who point to the possibility, within the framework of the SCA, of issuing a national environmental certification (High Environmental Value - HVE), in a region where official quality signs have grown significantly.

In sum, until now, the mobilization of service providers has been weak in France. In addition, it was partly triggered by MAA financial incentives to which operators complied. Their lack of communication on this subject leaves a doubt as to the reality of their mobilization<sup>2</sup>.

Secondly, the consultation of the regional rural development programs leads to the conclusion that, except in exceptional cases, **measure 2 has not been chosen as a source of funding**. The expenditure foreseen in the initial plans was small, averaging 4% of total regional budgets. Thus, clearly, in the light of regional rural development programs, this measure was not a priority for French regional authorities. For nine of them (out of twenty-two, excluding the Overseas Territories), the planned expenditure was less than 1%. However, there were significant gaps: the Midi-Pyrénées, Poitou-Charentes and Rhône-Alpes regions planned to allocate 20.8%, 12.7% and 9% of their rural development budgets respectively to the measure<sup>3</sup>. While these declarations of intent suggested that the actions concerned by measure 2 were not a priority for regional authorities, the funds actually committed at the end of 2018 confirm this intuition: in metropolitan France, seven cases had been committed (in the Bourgogne region), but none had been paid; only four cases had been paid in Guadeloupe and Guyane (see Table 1, page 8). In short, measure 2 has very little involvement in France. However, it is important to note that financial alternatives exist, in particular through a national instrument, the CASDAR, through which the agricultural advice is traditionally financed.

---

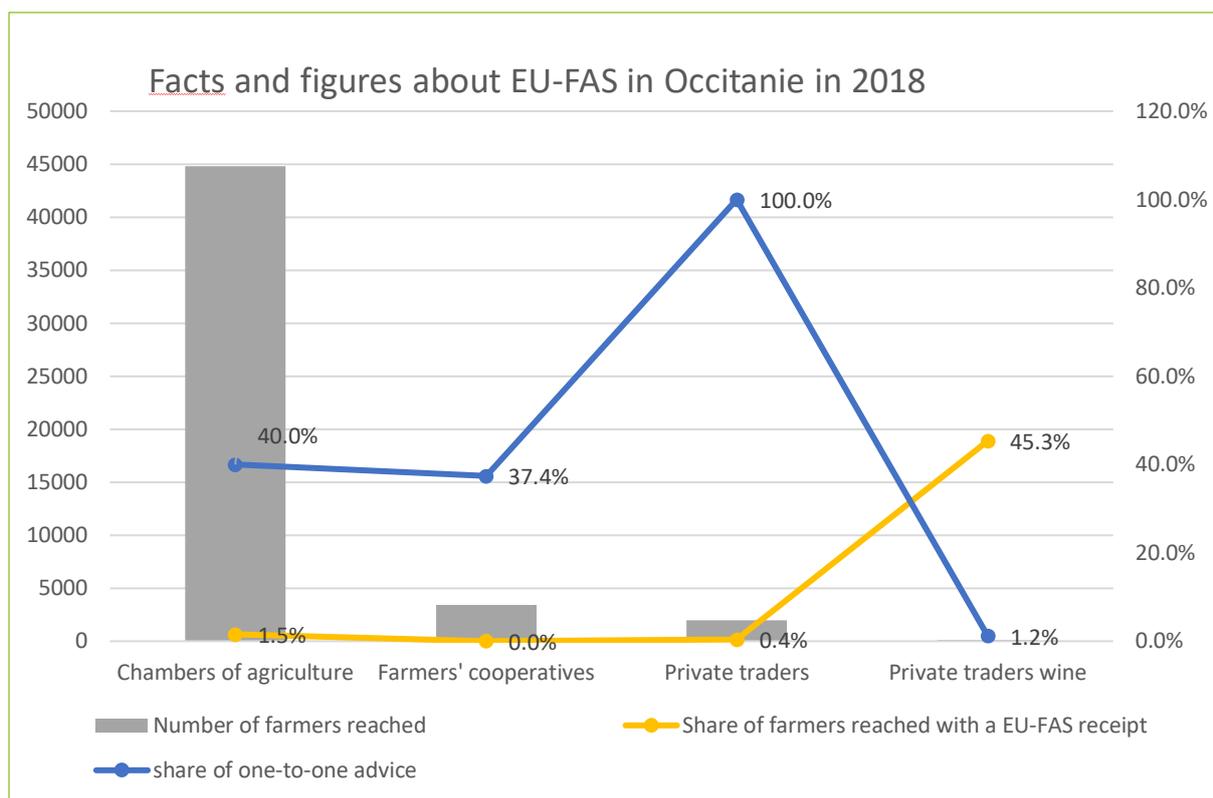
<sup>2</sup> Most DRAAF and CRA websites do not report any action in this area.

<sup>3</sup> Figures based on regional rural development plans ([https://enrd.ec.europa.eu/policy-in-action/rural-development-policy-figures/rdp-summaries\\_en](https://enrd.ec.europa.eu/policy-in-action/rural-development-policy-figures/rdp-summaries_en)).

	M02: first proposition (source: ENRD factsheet)	M02: actual planing (source: French Ministry of agriculture)	M02: actual spending (source: French Ministry of agriculture, May 2019)
Alsace	700 000	300 000	0
Aquitaine	9 200 000	0	0
Auvergne	6 700 000	0	0
Basse Normandie	7 300 000	0	0
Bourgogne	6 700 000	1 791 587	566 586,81
Bretagne	3 100 000	0	0
Centre	5 500 000	0	0
Champagne Ardenne	3 600 000	1 800 000	0
Franche-Comté	1 900 000	0	0
Haute-Normandie	1 400 000	0	0
Île de France	0	0	0
Languedoc-Roussillon	2 800 000	0	0
Limousin*	5 100 000	0	0
Lorraine	3 300 000	1 500 000	0
Midi-Pyrénées*	18 900 000	0	0
Nord - Pas-de-Calais	3 000 000	0	0
Pays de la Loire	5 000 000	0	0
Picardie	3 200 000	0	0
Poitou-Charentes	4 300 000	0	0
PACA	2 900 000	0	0
Rhône-Alpes	15 200 000	0	0
Corse	3 300 000	0	0
Réunion	36 500 000	7 830 000	4 446 828
Guadeloupe (dont St Martin)	4 000 000	9 369 240	1 745 373
Martinique	5 900 000	6 000 000	0
Guyane	7 800 000	2 240 000	1 385 883
Mayotte	3 700 000	1 341 000	0
<b>Total national</b>	<b>171 000 000</b>	<b>32 171 827</b>	<b>8 144 671</b>

**Table 1. The expenditure planned and contracted by regional authorities under Measure M02**

Finally, **although, as set in the last national regulations, an administrative monitoring system has been set up, it has not yet been implemented**, with the exception of one case (the DRAAF in the Occitanie region). But in this case the information we collected suggests that the data recorded by the service providers, which the DRAAF services have transmitted to the Ministry of Agriculture, assimilate FAS and agricultural advice. In that respect, in 2018 (no figures are available before that date), 50314 councils were reportedly issued under the FAS (there are 68,000 farms in the region). According to our information, this assimilation between FAS in particular and agricultural advisory services in general is due to the - very broad - scope of the FAS regulation, which tends to encompass all agricultural advisory services. In fact, according to one provider we met, FAS authorization has no impact on the concrete content of advisors' work, except to impose additional reporting requirements on them. To conclude this point, it should be noted that the data available for the Occitanie region must, however, be interpreted with caution: the vast majority of service providers were unable to provide DRAAF the certificates they must keep in accordance with the provisions of the implementation circulars (see Graph 1, page 9).



**Graph 1. Review of the FAS monitoring system in Occitanie based on the cross-referencing of declarations on the number of farmers affected, the number of individual services and the number of advice certificates provided by the service provider organizations<sup>4</sup>**

In short, it seems that the application of European regulations on the FAS is for the time being partial at the national level. In particular, the MAA has given impetus, not so much to ensure strict application of these regulations but to achieve the objectives of national legislations (the ESSOC law especially). In the field, the service providers have not been very active. The Occitanie region is an exception. However the mobilization of advisory organizations on the FAS is not so much about this instrument but about the fact that it allows them to issue a national environmental certification (High Environmental Value – HVE – especially). In addition, as the scope of the FAS is very broad, it tends to cover all areas of agricultural advisory services. Operators assimilate FAS and farm advisory services: being accredited as service provider under the FAS regulations has little impact on their practices, unless it imposes an additional bureaucratic burden.

#### IV- Discussion

Our survey raised three main lines of discussion. The first refers to the embedding of European regulations on FAS and in existing national policies on advisory services. Our information shows the primacy of the national political agenda on this European public action (4.0.). The second concerns the regional implementation of the FAS: if this is for the time being very incomplete, an exception comes up in the Occitanie region (4.1). Finally, the third line of discussion relates to the administrative burden imposed by the European regulation on the agents who seize it. For many, this constitutes a major obstacle to its implementation. This criticism coincides with the more general criticism of the bureaucratic cost of managing the CAP (4.2.).

<sup>4</sup> Graph compiled from data collected by the DRAAF of the Occitanie region.

## A) The uneasy embedding of EU FAS regulations and national policies

EU regulations on FAS, as any public policy, must reckon with the "already-there" (Lascoumes, 1994) of the public action. France has a long history of agricultural advisory services (Muller, 1984). From 1958, this field of action has been co-managed by the agricultural administration and the main trade-union (*la Fédération Nationale des Syndicats d'Exploitants Agricoles* – FNSEA), mainly through the chambers of agriculture. At the beginning of the 2000s, co-management tended to give way to the contracting of public action (Labarthe, 2006): the National Program for Agricultural and Rural Development (PNDAR) defines a framework for public action - around the watchword of the "agro-ecological transition" - in which calls for projects are launched, notably through CASDAR (a budget fed by a tax levied on the turnover of farms). But these instruments do not exhaust, far from it, national public interventions in agricultural advisory services. For instance, since 2008, the Ecophyto Plan - which aims to reduce the use of pesticides - is a privileged channel for funding actions that fall under agricultural development. Finally, in addition to national interventions, devolved bodies - regional and county authorities - dedicate increasing budgets to the agricultural advice. In short, in this field, policy tools are numerous and old. They are at the origin of advisory networks that are also multiple and old (chambers of agriculture and competing networks). In this regard, it should be noted that the cooperative movement - which has experienced strong growth in France - has emerged, particularly since the 1980s (Brunier, 2018), as a major source of agricultural advice. Unlike traditional networks (such as the Chambers of Agriculture), agricultural advice offers by the cooperative movement is backed on trading activity: its cost is at first "free"<sup>5</sup>, consuming low or not public funds.

For many, the "already-there" of national public action on agricultural advice tends to fuel a representation that the FAS constitutes a "useless" policy. This feeling seems particularly marked at the level of agricultural elites, top-ranking civil servants and trade-union activists. In the words of an official who drafted the first application circular: *"for unions, the FNSEA for instance, it was an additional constraint, no surprise. In the ministry, it did not interest many people. It was also a constraint. But we had to check the box. We had to do something"*. This situation seems still current: asked for an interview to prepare this report, an officer in charge of this regulation at the MAA, told us in an electronic mail that for him, the FAS, *"it is two or three emails a year"*. When he took office, he drew up an internal note, for the attention of the Directorate-General of the DGPE, noting that EU regulations remained a dead letter. But, seemingly disinterested, his hierarchy did not follow-up. The same officer told us that, as his job description evolved, the management of the FAS - which was originally supposed to take up a small part of his time - had simply disappeared: *"officially, no one takes care of this in the ministry"*.

For this civil servant, this situation is due to two main reasons. First, according to the representations of his colleagues, this regulation aims at creating an information mission for farmers who, in France, would already exist. Second, always referring to the representations of his colleagues, this regulation would have little future in the sense that it would be abandoned in the next reform of the CAP. Finally, we have to note that while the FAS recently raises an interest at the level of the DGPE, this is not so much about complying with European regulations. Until 2018, date of promulgation of the ESSOC law, the regulatory information of farmers was mainly the responsibility of the county services of the MAA (the Directions Départementales des Territoires - DDT). Since 2018, to achieve the objectives of the ESSOC law, that is reducing the workload of the DDT agents when the State is seeking to reduce the number of its agents, the MAA (the DGPE specifically) encouraged the CRA to be accredited under the FAS regulations. Thus, if this public action arouses a new interest (still modest), it is because it echoes with the national political agenda.

---

<sup>5</sup> In fact, the cost of the advisory activity that cooperatives employees endorse is internalized in the purchase price of the products they collected and/or sold.

## B) A weak impetus on the field

At the level of DRAAFs, we noticed a weak impetus to enforce the application circulars: the authorizations are few; official communication via websites is almost non-existent; the monitoring system provided for in the application circulars is not implemented. However, we observed that the Occitanie region differs in the national landscape. Its agents seized this regulation because it was in their eyes an instrument of knowledge - hence of steering - of the service that provide advisory organizations. According to a civil servant in charge of this regulation:

*"Three years ago [when I took office], nothing happened (...). We asked the partners. The necessary documents have been posted online - a pre-filled authorization file (...). It allows us to have a complete vision on what is happening on the side 'private advice'. The idea is this: the networks 'private advice' develop tools. We want to know who is mobilized, with what skills".*

In other words through the monitoring system that it establishes, the circular on the FAS makes it possible for this agent to collect information that he did not previously have access to. For him and his colleagues, FAS regulations - understood as a steering instrument - are seen as a lever for action, hence the desire to promote its implementation:

*"It allows us to have a foothold in the world of advice. A complex world. We had meetings where everybody showed up, said what he was doing, and how and so on. It also allows us to see the anomalies of implementation. In particular for cross-compliance. So to remedy where things are wrong. It's a way to communicate".*

In the Occitanie region, DRAAF has thus attracted the interest of the service providers both by organizing information meetings and by facilitating the authorization process (mainly via its website, which provides the legal basis for this public action). One argument has been raised: the possibility, within the framework of the FAS, to issue a national environmental certification (High Environmental Value - HVE). The latter is particularly acute in a region where official signs of quality have developed strongly. Legislative developments reinforce this enthusiasm: in 2018, the law for the balance of commercial relations in the agricultural and food sector and a healthy, sustainable and accessible to all (known as EGALIM law<sup>6</sup>) establishes the possession of a HVE as a criterion for catering supply. Beyond this regional dynamic, other providers perceived the FAS as a resource to legitimize their action on agricultural advice. This is true of the Haute-Garonne County, which - in an unprecedented way in France - is carrying out a mission to advice farmers on its territory. Being accredited under FAS regulations is perceived by its officials as a means to legitimize this action, some saying that its action on this field goes beyond its legal remit.

This example, however, is an exception in the national landscape: in other regions, the weak impetus of the DRAAF echoes that of the service providers. Few of them have, it seems, asked for an accreditation. Some (the CRAs) did it, as already noted, because the MAA - pursuing the objectives of the ESSOC law - encouraged them financially. But their enthusiasm seems to be weak: if some have been accredited, they do not communicate towards farmers - their potential customers - to benefit from their services. These elements suggest that, in general, the FAS is not identified as an instrument from which consulting organizations could benefit.

## C) A perceived administrative burden

The final line of discussion focuses on the criticism of the bureaucratic burden that FAS regulations would cause. For many, those would aim at creating a situation – offering agricultural advice on the whole national territory - which, in fact, would already exist (see 4.0.). Thus our interlocutors evoke

---

<sup>6</sup> Law 2018-938 of October 30 2018.

the network of the chambers of agriculture, organizations which statutorily have for mission the information and the advice of farmers. To this network are added others, associative or cooperative. In fact, according to this line of analysis, those regulations constitute more or less a useless bureaucratic burden. Moreover, an internal note of the MAA<sup>7</sup> aimed at "reshaping the FAS" in the spirit of the draft law on the simplification and the right to make mistakes (which will become the ESSOC law). The diagnosis is unambiguous: "The FAS is not very successful. Indeed, the number of accredited organizations remains low, because of its high complexity and low attractiveness "(p.2). In response, the note proposes to "lighten up" the public action, in particular its "access modalities" (authorization of unlimited duration and reduction of the deliverables to be provided in particular). Again the aim is not so much to ensure a good application of the European regulation, but to allow that of ESSOC law which will be promulgated the following year (in 2018). This approach has led, as we have seen, to the accreditation of all CRAs, for which regulatory information of farmers is a new competence (a mission previously provided by the County services of the MAA (*les Directions Départementales des Territoires – DDT*)).

Service providers also criticize the bureaucratic dimension of European regulations on FAS. As already said, they are – according to implementation circulars - subject to reporting requirements. As we have seen, for those we met, their participation in the FAS has had little effect on their practices. With the exception that this participation implies a significant bureaucratic burden, the main elements of which are the drafting of the accreditation file and the drafting of an annual follow-up report. For advisors, in the field, the FAS generates neither more nor less the production of a written record attesting the delivery of an advisory service:

*"What does it change in the daily life of advisers? A paper is signed every year by the farmer! 'You agree to take our advice under the FAS' ". For these agents, the FAS represents a bureaucratic burden. However, because they accompany farmers in drawing up their applications for CAP support, they already consider that they are doing a lot of paperwork. The bureaucratization of their work, which is fueled by FAS regulations and others, leads to demoralization. It's completely techno. And the controls? Who will control? The Prefect (laughs)? We do paperwork for nothing. Traceability saddens me. It takes our time, it prevents us from doing our job (...). This is not a pleasure for our advisors. Many are fed up<sup>8</sup>".*

Facing this additional bureaucratic burden, some managers developed strategies to make "traceability" an opportunity, vis-à-vis external partners (financiers and journalists for example), to make their action visible, so as to legitimize it (case of the Haute-Garonne County). In short, for the agents we met, FAS regulations is one expression among others of the avalanche of norms, standards and procedures - characteristic of the neoliberal contemporary period - which feeds on a daily basis a loss of meaning in the work (Hibou, 2012).

In conclusion, it should be noted that the criticism of the bureaucratic dimension of the FAS also concerns the European modalities of its financing, that is the measure 2 of the Rural Development Regulation. We have observed that, with some exceptions, this is hardly activated in France. The managing authorities - MAA and DRAAF - prefer to resort to national financial instruments of agricultural advice, deploring once again, the bureaucratic burden involved by the measure 2. An agent of a DRAAF told us:

*"The wish was to not open [measure 2]. I have always been told that. On the implementation side, this should not be easy. It is necessary to provide proof of the activities, the working time of the agents and so on. These are investments that are*

---

<sup>7</sup> MAA, Internal note, 2017.

<sup>8</sup> Interview, advisory supplier.

*difficult to justify. The bureaucracy is scary: can organizations support it? And we must advance the money! So you have to have cash. This favors big structures. For the measure 'advice' this is what we feared. The risk was too great".*

As we have already seen, the financing of advisory activities is based on a variety of national instruments whose administrative management requirements are considered more flexible: CASDAR; EcoPhyto Plan or local networks (*Groupements d'Intérêt Économique et Environnemental* - GIEE. As an MAA official told us: "*in terms of administrative management, between the CASDAR and the European funds, there is a huge gap!*".

\* \* \*

In total, according to the information we collected, the implementation of the European regulations on the FAS is incomplete in France. Undoubtedly, acknowledgement of the soundness of the FAS is still weak in France. This is the challenge for the European authorities.

## Factsheet about FAS assessment in France

### Some Key facts about CAP implementation in France

- Number of farmers in the country.....	<b>525000 farmers</b>
- Share of 2 <sup>nd</sup> pillar in CAP expenditure.....	<b>17.2%</b>
- Share of Knowledge measures (M01&M02) in the 2nd pillar of CAP.....	<b>1.7%</b>
- Planned expenditure per farmer (M01&M02).....	<b>534 euros / farmer</b>

### Some Key facts about the implementation of the EU-FAS in France

#### Pillar one

#### *Level of application*

National

#### *Domains selected for the EU-FAS regulation*

##### **Mandatory**

- Cross-compliance
- Payment for environment & climate
- Modernisation
- Pesticides directive
- Water directive

##### **Optional**

- Diversification
- Risk management
- Organic
- Information on climate

#### *Types of suppliers accredited*

##### *Indicate the type of suppliers accredited*

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Private independent consultant/firms | <input checked="" type="checkbox"/> Chambers of agriculture                     |
| <input checked="" type="checkbox"/> SME or start-ups                     | <input checked="" type="checkbox"/> Farmers' rings or associations              |
| <input checked="" type="checkbox"/> Public extension organisation        | <input checked="" type="checkbox"/> Farmers' cooperatives                       |
| <input checked="" type="checkbox"/> NGO                                  | <input checked="" type="checkbox"/> Private firms or retailers (inputs/outputs) |
| <input type="checkbox"/> Charities                                       | <input checked="" type="checkbox"/> Bookkeepers                                 |
|  | <input type="checkbox"/> Other (specify).....                                   |

#### *Method required for advisory services*

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> One to one on the farm      | <input type="checkbox"/> Telephone helpdesk               |
| <input checked="" type="checkbox"/> One to one outside the farm | <input type="checkbox"/> General information via Internet |

<input checked="" type="checkbox"/> Small group advice on the farm	<input checked="" type="checkbox"/> Publication (paper copies)
<input checked="" type="checkbox"/> Small group outside the farm	<input type="checkbox"/> No requirement
<b>Conditions required to be accredited for advisory organisation</b>	
<input checked="" type="checkbox"/> Competences of advisors	<input checked="" type="checkbox"/> Networks
<input checked="" type="checkbox"/> Training of advisors	<input checked="" type="checkbox"/> Monitoring of advice activities
<input type="checkbox"/> Data base	<input type="checkbox"/> Knowledge platforms
<b>Target public (categories of farmers or farm workers)</b>	
Target group specified..... <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> Farms with more than 15000 € direct support	<input type="checkbox"/> Zoning criteria.....
<input type="checkbox"/> Smaller farms.....	<input type="checkbox"/> Other criteria.....
<input type="checkbox"/> Other farms' criteria .....	
<b>Pillar Two</b>	
Use of measure M02..... <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Number of beneficiaries...Unknown.....	
Average expenditure per farmer...15 euros/farmers (in 2018).....	
Domain selected: Unknown	
<input type="checkbox"/> Cross-compliance	
<input type="checkbox"/> Paiement for environment & climate	
<input type="checkbox"/> Modernisation	
<input type="checkbox"/> Pesticides directive	
<input type="checkbox"/> Water directive	
<input type="checkbox"/> occupational Health	
<input type="checkbox"/> Farms setting up for the first time	

## List of references

Brunier S. (2019), *Le Bonheur dans la modernité. Conseillers agricoles et agriculteurs (1945-1985)*, Paris, Éditions de l'ENS.

Hibou, B. (2012), *La bureaucratisation du monde à l'ère néolibérale*, Paris, La découverte.

Labarthe, P. (2006), La privatisation du conseil agricole en question: Évolutions institutionnelles et performances des services de conseil dans trois pays européens (Allemagne, France, Pays-Bas), PhD dissertation, Université de Marne-la-Vallée.

Lascoumes, P. (2010), *L'Éco-pouvoir: environnements et politiques*, Paris, La découverte.

MAA (2015), Instruction technique, Habilitation par les DRAAF des organismes de conseil pour le système de conseil agricole (DGPE/SDPE/2015-823).

MAA (2009), Circulaire, Habilitation des organismes de conseil pour le système de conseil agricole (DGPAAT/SDEA/C2009-3003).

MAA (2009), Circulaire, Habilitation des organismes de conseil pour le système de conseil agricole (DGPAAT/SDEA/C2009-3123).

MAA (2007), Circulaire, Habilitation des organismes de conseil pour le système de conseil agricole (DGPEI/SSAI/C2007-4031 DGER/SDRIDCI/C2007-2010).

Muller P. (1984), *Le Technocrate et le paysan. Essai sur la modernisation de la politique agricole en France*, Grenoble, Les Éditions ouvrières.