



Remedial Action Plan

LPIS QA Workshop

Varese

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Development

1



DISCLAIMER

This presentation has been prepared to facilitate discussions at the LPIS QA workshop. It does not represent the official position of the Commission and has no interpretative value.

2



LPIS QA Remedial Action

Commission Delegated Regulation (EU) No. 640/2014

Article 6 (1)

- Where the results of the quality assessment reveal deficiencies in the system, the MS shall take appropriate remedial action

Article 6 (3)

- Where appropriate, the remedial action plan and the timetable for their implementation shall be sent to the Commission

Deadline

- 31st January following the calendar year in question



Remedial Action Plan (RAPs)

	2016	2017	2018*
Total RAPs received	18	19	16
RAPs received but not required	2	4	1
Missing RAPs	4	3	1?
Total net RAPs required	20 (45%)	18 (41%)	16 (36%?)

* Provisional data for 2018 ETS exercise (5 ETS missing; RAPs??)



RAP observations

General observations:

- Some very detailed & well-planned
- Some lacking detail/difficult to follow
- Limited “additional” actions in some cases

Deficiencies

- Absences of timelines
- Lack of linkage to specific QEs
- Lack of linkage to previous/on-going actions
- Not all non-conforming QEs addressed



RAP template

ETS Remedial Action Plan. MS: _____ LPIS: _____ ETS Year: _____

Part A Give a detailed description of: (i) The ETS analysis, (ii) LPIS weaknesses, (iii) planned remedial actions, (iv) specify the risk of not completing the planned actions. Where applicable specify: (iv) any additional resources required and (v) provide a review of the actions related to previous remedial action plan.

Part B Summary table of ETS Remedial actions¹

Specific target LPIS weakness addressed and related non-conforming element(s)	Remedial action (s) Give details & indicate scope (if the action will be completed in different steps (eg. phased by region / over a time period).	LPIS - Expected results and timeline (in term of general LPIS improvement) If an action was already on-going please give information on previous progress.	QE- Expected impact (results/figures and timeline) on the related quality elements.	Planned start date	Target completion date(s) ² (& interim milestones)
1.					



RAP Template Part A

Detailed description:

- i. The ETS analysis
- ii. LPIS weaknesses
- iii. Planned remedial actions **i.e. additional to annual tasks**
- iv. Specify the risk of not completing the planned actions

Where applicable:

- v. Any additional resources required
- vi. Provide a review of the actions related to previous remedial action plan.



RAP Template Part B

Summary table of ETS Remedial actions

- i. Specific target LPIS weakness addressed and related non-conforming element(s)
- ii. Remedial action (s) **nb. over and above "normal" annual tasks**
- iii. Give details & indicate scope (if the action will be completed in different steps (eg. phased by region / over a time period)
- iv. LPIS - Expected results and timeline
- v. QE- Expected impact (results/figures and timeline) on the related quality elements
- vi. Planned start date
- vii. Target completion date (incl. interim milestones)



Remedial Action Plan - Role

Key purposes

- Fixing weaknesses identified
 - Ensure each non-conformity is addressed
 - Tool for managing LPIS improvement
 - Management tool
 - senior management buy-in
 - resource allocation etc.???
- Mitigating audit risks associated with area payments and possible financial corrections

9



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Key purposes

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Follow-up??
How well is your RAP implemented??

10



Overview of AGRI presentations



Optimising the ETS/RAP process

- ✓ Quality control – maintaining/improving standards
- ✓ Management tool - resource planning
- ✓ Implement and review impact of actions – trend analysis
- ✓ Invest in your LPIS, and think of a future without the need for RAPs !!!
- ✓ Ultimately, we all want well-functioning systems with low audit risks



Thanks for your attention

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