

**Priority question for written answer P-000188/2026
to the Commission**
Rule 144
Nikos Pappas (The Left)

Subject: Interpretation of the concept of ‘genuine agricultural activity’ and prevention of artificial conditions for aid in the context of Greek JMD 3378/2025

Joint Ministerial Decision No 3378/2025 of Greece (Government Gazette, Series II, No 6327/26.11.2025)¹ laid down rules on the allocation of eligible pasture areas and the activation of basic aid entitlements under the common agricultural policy, which raise questions as to their compliance with EU law.

In particular, that decision authorises: a) the imputed calculation of livestock numbers on the basis of tax data (form E1) for beneficiaries who produce neither milk nor meat, (b) the allocation of public pastures outside the neighbouring prefecture or even outside the Region, with the only additional condition being the submission of invoices for the purchase of feed, and (c) the activation of entitlements from the national reserve with public pastures, even when the private pastures on which they were established have been abandoned.

In the light of Articles 59 and 60 of Regulation (EU) 2021/2116, which prohibit the creation of artificial conditions for aid and require genuine and verifiable agricultural activity, and the established case law of the Court of Justice of the European Union (in particular cases C-515/07, C-434/12 and C-61/09), can the Commission say:

1. Does it consider that the above practices are compatible with the concept of ‘genuine agricultural activity’ in the context of the common agricultural policy?
2. How does it assess the risk of artificial situations being created for the sole purpose of obtaining aid?
3. Does it intend to examine, within its remit, the application of this national legislation and its impact on the protection of the Union’s financial interests?

Submitted: 19.1.2026

¹ JMD 3378/2025