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AGRICULTURAL SUPPORT ADMINISTRATION IN POLAND AND ESTONIA: TRANSFERABLE INSTITUTIONAL AND DIGITAL PRACTICES FOR UKRAINE

Abstract. The article examines the institutional, procedural and digital organisation of agricultural support administration in Poland and Estonia and identifies practices suitable for Ukraine. The analysis extends beyond paying agencies to the allocation of functions among competent authorities, implementing bodies and territorial offices; applications, verification, decision-making, payment, recovery and review; and the use of registers, electronic services and area-monitoring data. Comparative-legal, formal-dogmatic, systemic and functional methods are applied. The Polish model combines a differentiated institutional structure, statutory identification of authorities responsible for individual cases, controlled delegation and a modular digital environment centred on the Electronic Services Platform. The Estonian model is more compact, yet preserves a distinction between policy direction, accreditation, implementation, registry administration, control and decision-making in individual cases, integrating these functions through e-PRIA, agricultural registers and area monitoring. The article substantiates institutional, procedural and digital coherence as a criterion for evaluating agricultural support administration. It requires correspondence between competence, workflow, authoritative data, the evidentiary status of digital outputs, responsibility for the final decision and means of correction and review. The scientific novelty lies in distinguishing transferable public-law safeguards, organisational arrangements adaptable to national conditions and scale-dependent solutions that should not be copied mechanically. For Ukraine, priority is assigned to a complete map of functions and authorities, interoperable data governance, applicant-oriented electronic services, legally regulated automated processing and phased implementation separating testing from the exercise of public powers. The findings may support legislative approximation, subordinate rule-making and the design of the Integrated Administration and Control System.

Key words: *agricultural support; public administration; institutional architecture; digital administration; integrated administration and control system; administrative procedure; Poland; Estonia; Ukraine.*

Овєян Г. В. Адміністрування підтримки сільського господарства у Польщі та Естонії: інституційні й цифрові практики, придатні для України

Анотація. Статтю присвячено дослідженню інституційної, процедурної та цифрової організації адміністрування підтримки сільського господарства у Польщі й Естонії та визначенню практик, придатних для розвитку відповідної системи в Україні. Аналіз охоплює розподіл функцій між компетентними органами, виконавчими суб'єктами та територіальними підрозділами; подання і перевірку заяв, ухвалення рішень, здійснення виплат, повернення коштів та оскарження; використання реєстрів, електронних сервісів і даних моніторингу площ. Застосовано порівняльно-правовий, формально-юридичний, системний і функціональний методи. Установлено, що польська модель вирізняється диференційованою інституційною побудовою, визначенням органів, уповноважених вирішувати індивідуальні справи, контрольованим делегуванням і модульним цифровим середовищем. Естонська модель має компактну організацію та зберігає розмежування політичного керівництва, акредитації, виконання програм, ведення реєстрів, контролю та вирішення індивідуальних справ через e-PRIA, аграрні реєстри й моніторинг площ. Обґрунтовано інституційну, процедурну та цифрову узгодженість як критерій оцінювання адміністрування аграрної підтримки. Вона передбачає відповідність між компетенцією, адміністративним провадженням, даними, доказовим значенням цифрових результатів, відповідальністю за рішення та засобами виправлення й перегляду. Значимість дослідження полягає в розмежуванні придатних до запозичення публічно-правових гарантій, адаптованих організаційних рішень і масштабозалежних моделей, механічне

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відтворення яких є недоцільним. Для України пріоритетними визначено закріплення функцій і компетенції, сумісне управління даними, орієнтовані на заявника електронні сервіси, законодавче впорядкування автоматизованого опрацювання та поетапне впровадження з відмежуванням технічного тестування від здійснення владних повноважень. Результати можуть бути використані для наближення законодавства, підготовки підзаконних актів і проєктування інтегрованої системи адміністрування та контролю.

Ключові слова: *підтримка сільського господарства; публічне адміністрування; інституційна архітектура; цифрове адміністрування; інтегрована система адміністрування та контролю; адміністративна процедура; Польща; Естонія; Україна.*

Statement of the problem. Agricultural support is implemented through a sequence of public-law decisions. Policy objectives must be translated into support schemes; eligibility conditions must be published and applied; applications and evidence must be received, verified and, where necessary, corrected; an authorised body must decide on entitlement and amount; public funds must then be paid, accounted for, controlled and recovered if unlawfully obtained. Monitoring and evaluation complete the cycle by returning information to policy-makers. The quality of the system therefore depends not on one institution or one digital platform, but on the legal coherence of the entire administrative chain.

The current architecture of the Common Agricultural Policy confirms this broader perspective. Regulation (EU) 2021/2115 requires a managing authority responsible for the efficient, effective and correct implementation of the CAP Strategic Plan and for an electronic information system supporting monitoring and evaluation [1, Art. 123]. Regulation (EU) 2021/2116 separately regulates the competent authority for accreditation, paying agencies, certification bodies, financial management, control and the Integrated Administration and Control System (IACS) [2, Arts. 8–12, 65–70a]. Read together, the two regulations establish a distributed system in which strategic management, implementation, financial assurance, data processing and individual administrative decisions remain distinct but coordinated.

Ukraine is constructing elements of a comparable mechanism through the State Agrarian Register, future rules on the Paying Agency and delegation, IACS and the general guarantees of administrative procedure [3; 4; 5; 6]. The central question is whether agricultural-support functions are legally attributed, procedurally connected and digitally supported so that each decision is traceable to a competent authority and each material datum can be verified.

Poland and Estonia are useful comparators because they implement the same Union framework through markedly different administrative arrangements. Poland relies on a differentiated and territorially extensive structure. Estonia has a compact administration and a high degree of digital integration. The comparison makes it possible to separate generally transferable legal safeguards from organisational solutions conditioned by population, territory, administrative tradition and the maturity of existing registers.

Purpose of the article. The purpose of the article is to identify the institutional, procedural and digital practices used in Poland and Estonia that may be adapted for agricultural support administration in Ukraine. The analysis covers strategic management, the allocation of competence, implementation and delegation, the handling of individual cases, digital service delivery, registry and monitoring data, financial control and remedies.

Analysis of recent research and publications. Recent scholarship addresses separate dimensions of agricultural support administration. Petrova and Svitlovskyi examine Ukraine's State Agrarian Register and emerging support mechanism, emphasising verified data and institutional capacity [7, pp. 243–248]. Suchoń analyses the Polish financing framework and ARiMR's role, but gives less attention to managing authorities, territorial decision-makers and digital procedure [8, pp. 33–41]. Cagliero and co-authors demonstrate the diversity of national choices under the CAP's new delivery model [9, pp. 49–66]. Williams identifies authorisation, opacity, scalable error, procedural fairness and reason-giving as central administrative-law concerns in algorithmic decision-making [10, pp. 468–494]. Van der Velden and co-authors, together with Ehlers, Huber and Finger, show that satellite monitoring and digitalisation redistribute agency and depend on institutional capacity [11; 12]. However, scholarship

still lacks an integrated legal criterion connecting competence, procedure and digital infrastructure.

Presentation of the main material. The EU framework begins with a distinction between policy management and expenditure administration. Under Article 123 of Regulation (EU) 2021/2115, the managing authority bears responsibility for the implementation of the CAP Strategic Plan, ensures an appropriate electronic information system and supplies the data necessary for monitoring and evaluation [1]. Its functions concern the programme as a whole. They are not identical to the examination of an individual application or to the authorisation and payment of expenditure.

Regulation (EU) 2021/2116 adds the financial and control architecture. The competent authority issues and reviews accreditation. An accredited paying agency manages and controls expenditure within the limits of the tasks assigned to it; tasks may be delegated, except for making payment, but the paying agency remains responsible for the management and control system [2, Arts. 8–9]. A certification body provides an independent opinion on the completeness, accuracy and veracity of annual accounts and on the proper functioning of governance systems [2, Art. 12]. These institutions are connected, yet they do not form a hierarchy in which one body absorbs every function.

Commission Delegated Regulation (EU) 2022/127 translates the accreditation requirement into organisational conditions: a clear allocation of authority, separation of incompatible functions, written procedures, supervision of delegated tasks, audit trails, internal audit, continuity arrangements and information security [13, Art. 1 and Annex I]. Those requirements make it possible to identify who performed a material operation, on what authority, with what information and under which control.

IACS must be understood in the same institutional context. Regulation (EU) 2021/2116 provides for beneficiary identification, the land parcel identification system, geospatial and animal-based applications, controls and the area monitoring system [2, Arts. 65–70a]. Commission Implementing Regulation (EU) 2022/1173 regulates electronic applications, pre-filled information, communication, amendment and withdrawal [14, Arts. 3–7]. Digitalisation changes the medium and speed of administration, but not the need for an identifiable legal basis, competent authority and reviewable outcome.

This relationship may be expressed through the criterion of institutional, procedural and digital coherence. Institutional coherence concerns the lawful attribution and separation of functions. Procedural coherence requires that data collection, verification, communication with the applicant, decision-making and review form one legally ordered proceeding. Digital coherence means that the architecture of registers, interfaces and automated operations corresponds to those institutional and procedural rules. A system is incoherent where software performs an operation for which no body has competence, where the origin or version of decisive data cannot be reconstructed, or where a digital discrepancy produces an adverse consequence without a legally adequate route for correction and review.

Polish law offers a differentiated model of support administration. The Act of 8 February 2023 on the CAP Strategic Plan for 2023–2027 identifies the minister responsible for rural development as the managing authority [15, Art. 6]. The minister performs Member State tasks not assigned elsewhere, monitors and evaluates implementation and may issue guidelines to the paying agency, implementing bodies, intermediary institutions and other participants. Significantly, those guidelines may not determine the merits of an individual case [15, Art. 6(2)]. Strategic steering is thus separated from decision-making in individual administrative cases.

ARiMR is the accredited paying agency and performs tasks relating to granting and paying support, recovery and administrative and on-the-spot checks [15, Arts. 9–10]. This position is central but not exclusive. In cases where support is granted by administrative decision, the head of the competent district office is the authority in the individual matter [15, Art. 65(1)]. The Act also applies the Code of Administrative Procedure to individual cases decided by administrative decision unless the special legislation provides otherwise [15, Art. 5]. The applicant therefore deals with a digital environment, but the final act remains attributable to a statutorily identified authority.

The Polish model also illustrates controlled participation by other public bodies. Voivodeship self-governments may conduct proceedings, carry out checks, select operations, conclude support agreements, determine recoverable amounts and request voluntary repayment. The delegated scope may include determining the amount to be recovered and requesting voluntary repayment, but excludes making payments and pursuing or enforcing recovery of the amount due [15, Art. 10(3)–(4)]. The agreement must specify the tasks and method of performance, allow ARiMR to exercise control and audit, preserve documentation and disclose essential information about the delegation [15, Art. 10(5)–(6)]. Delegation is therefore a legally structured form of implementation. It does not dissolve the distinction between the body performing a task and the institution accountable for the integrity of the financial-control system.

Poland's digital environment corresponds to this differentiated structure. The Electronic Services Platform (Platforma Usług Elektronicznych, PUE) provides a common access point for identification data, applications, case-status information, correspondence and financial data [16]. It does not replace the specialised systems through which particular operations are performed. ARiMR separately identifies eWniosekPlus, IRZplus, PUE, the ARiMR mobile application, eWoP, PAplus and the Geoportal among its information systems [17]. In the 2026 application campaign, eWniosekPlus was accessed through PUE and automatically assigned an application to the district office competent according to the applicant's residence or registered seat [18]. The transferable lesson is not that one portal should perform every administrative function, but that specialised systems should operate within a coherent environment for identity, communication and case management.

The treatment of area-monitoring results further demonstrates the relationship between technology and procedure. Polish legislation permits an applicant to amend an application after irregularities identified through administrative control or the area monitoring system have been communicated [15, Art. 60(2)(2)]. A remote-sensing signal is thus not equated automatically with a final legal finding. It enters an administrative process in which the applicant may react and the competent authority must determine the legal consequence.

Estonia's institutional design is more compact. The European Union Common Agricultural Policy Implementation Act applies the Administrative Procedure Act to CAP proceedings, subject to the specific rules of Union and national legislation [19, § 1(2)]. The Ministry of Regional Affairs and Agriculture is the authority competent to accredit the paying agency, while the Agricultural Registers and Information Board (Põllumajanduse Registrite ja Informatsiooni Amet, PRIA; ARIB in the English translation) performs paying-agency functions [19, §§ 4–5]. The Act permits delegation by administrative contract and provides for administrative oversight. Compactness therefore does not mean an absence of legally differentiated responsibilities.

Nor is implementation confined to PRIA. Depending on the intervention, compliance may be verified by PRIA, the Agriculture and Food Board, the Land and Spatial Planning Board, the Environmental Board, a state foundation or another designated authority [19, § 26(3)]. Some rural-development applications are submitted through local action groups, while PRIA or a state foundation may conduct evaluation [19, §§ 25–27]. This arrangement is smaller in scale than the Polish network, but functionally plural. The governing legislation determines which participant receives, verifies, evaluates or decides a matter.

Digital integration is achieved through e-PRIA and the Register of Agricultural Support and Agricultural Parcels. e-PRIA provides an authenticated environment for submitting applications, entering registry data, reviewing documents and consulting time-limited obligations, payments and debts [20]. The register contains the personal, contact, bank and other data needed to administer Union and national support and to identify agricultural parcels [21]. The strength of the Estonian model lies in the proximity of service delivery, registry administration and operational processing. That proximity reduces duplication, but it does not merge data maintenance, evidentiary assessment and the adoption of an administrative decision into a single technical function.

PRIA's area monitoring system uses Copernicus Sentinel imagery and other equivalent data, including geotagged photographs [22]. The

system analyses time series and may generate a task requesting photographic evidence. Artificial intelligence assists in assessing photographs; where compliance cannot be established, a case-worker examines the material and an on-the-spot inspection may follow [22]. For the 2026 campaign, applicants were permitted to amend monitored application data within prescribed periods, and rejected amendments were accompanied by an explanation [22]. The legally significant sequence is therefore monitoring, communication, possible correction or additional evidence, official assessment and a decision capable of challenge.

The two national models cannot be reduced to a contrast between a large and a small paying agency. Poland combines strategic management, a central implementing and financial institution, territorial decision-making in individual cases, controlled delegation and several specialised digital systems. Estonia combines ministerial competence, PRIA, other sectoral authorities, local and foundation-based implementation, integrated registers and electronic services. Both systems are plural; they differ in how functions are distributed and connected.

Three categories of comparative elements may accordingly be distinguished. The first consists of public-law safeguards that are transferable irrespective of administrative scale: statutory attribution of competence, separation of incompatible functions, traceable delegation, reliable data provenance, a reviewable final act and institutional responsibility for digital processing. The second includes arrangements adaptable to national conditions, such as the number and territorial organisation of offices, the use of intermediary institutions and the degree of registry concentration. The third consists of scale-dependent technical forms, including a particular portal layout, internal software configuration or organisational network. Copying the third category without reproducing the legal and administrative conditions supporting it would create appearance rather than capacity.

For Ukraine, this distinction is particularly important because the current legislation develops at different speeds. The Law “On the Principles of State Agrarian Policy and State Rural Development Policy” already regulates the State Agrarian Register and introduces a future institutional framework for the Paying Agency, delegation and IACS [3–4]. Cabinet Order No. 1526-r designates the Ukrainian State Fund for Support of Farms as the budgetary institution performing the functions of the Paying Agency from 1 July 2026 [5]. Designation does not substitute for the commencement of statutory powers, implementing rules or demonstrated operational readiness.

The transitional provisions require precise treatment. Articles 2-7 and 2-8, including the provisions governing IACS, are scheduled to enter into force on 1 January 2027 [4, sec. II]. The separate group of provisions that includes Article 2-6 on the Paying Agency enters into force eighteen months after publication of Law No. 4619-IX, that is, on 3 May 2027, but not earlier than the date on which the Agency begins functioning as determined by the authorised central executive body [4, sec. II]. The proviso concerning the operational start applies to that later group; it does not condition the entry into force of Article 2-8. This distinction must be reflected in subordinate legislation, technical specifications and institutional planning.

The Law of Ukraine “On Administrative Procedure” supplies a general procedural framework [6]. It requires lawful attribution of responsibility, access to case materials, reasoned administrative acts and effective remedies. Fully or partly automated administrative proceedings and automated administrative acts are permissible only where the law provides for them, and responsibility remains with the administrative body [6, Arts. 62, 63, 69]. The legislation does not prohibit automated decisions categorically, but makes legal basis, attribution and review indispensable. Since the general right to be heard contains exceptions, including for certain automated acts, special agricultural-support rules should expressly provide suitable means to correct source data, contest a machine-generated discrepancy and obtain review before or promptly after an adverse outcome.

The comparison supports a broader reform agenda. First, Ukraine needs a normative map of agricultural support administration as a whole. It should cover policy and scheme design, publication of eligibility conditions, registration, application intake, verification, evaluation, the adoption

of individual acts, payment, accounting, control, recovery, complaints, monitoring and evaluation. For each function, legislation or a properly authorised subordinate act should identify the competent body, the responsible structural unit, the permissible form of participation by another body, the legal result and the information system used. The Paying Agency must be located within this map rather than treated as synonymous with the entire system.

Second, programme management and the resolution of individual cases should be expressly distinguished. A body responsible for policy objectives, indicators, monitoring and evaluation may issue general implementation guidance, but should not determine the result of a particular application outside the procedure and competence established by law. The Polish prohibition on using managing-authority guidelines to decide the merits of an individual case is instructive in this regard [15, Art. 6(2)]. Ukraine should likewise ensure that methodological documents, software parameters and administrative instructions do not become concealed sources of substantive eligibility rules.

Third, the State Agrarian Register and IACS should be developed through a common data-governance model. An authoritative-source matrix should identify, for each category of identity, land, rights, animals, commitments, controls, payments and debt data, the official source, the body responsible for quality, the lawful purpose of use, the update frequency and the rule for resolving conflicts. Data imported or altered in the administrative process should retain source, date, version and the identity of the operation performed. Manual overrides require reasons and logging. The applicant should be able to see the material data used in the case and should not be required to submit information already lawfully available to the administration unless verification is objectively necessary.

Fourth, digital services should be designed around the administrative case rather than around institutional boundaries. A common authenticated entry point may connect application forms, registry services, correspondence, status information, obligations, payments and remedies while specialised systems remain operationally distinct. At the same time, digital-by-default administration must not become digital-only exclusion. Assistance, accessibility standards and an alternative channel should be available where a person cannot effectively use the electronic interface. An applicant should not bear the risk of the administration's internal information-system structure.

Fifth, the evidentiary use of monitoring and automated classifications requires a special procedural model. A notice of discrepancy should identify the parcel or other object, the source and date of the information, the possible legal consequence, the response period and the responsible authority. The applicant should be able to correct factual data, submit an explanation or geotagged evidence and request assessment of a disputed classification. A refusal, reduction or recovery decision must identify the applicable rule, established facts, decisive evidence, calculation and available remedy. Human assessment need not be imposed on every routine operation, but it should be available where the evidentiary conclusion is disputed or where the automated process cannot resolve material ambiguity.

Finally, implementation must be phased without confusing testing with the exercise of public authority. Technical pilots may assess data exchange, calculations, controls, system resilience and user interaction before all future provisions enter into force. They should not produce adverse external legal consequences unless the competent body and legal basis already exist. Readiness assessment should cover not only accreditation criteria relevant to the financial-control function, but also scheme governance, staffing, territorial capacity, data quality, cyber and business continuity, administrative procedure, complaints and judicial review. Readiness is the capacity of the whole system to produce lawful and reliable decisions, not merely the completion of software.

Conclusions. The experience of Poland and Estonia demonstrates that agricultural support is administered through an institutional and procedural system rather than by a single agency. Strategic management, implementation, financial assurance, registry administration, control, decision-making in individual cases and review must be legally separated where their functions differ and practically connected where the administrative process requires cooperation.

The Polish model is distinguished by a differentiated allocation of responsibilities: the managing authority directs implementation at programme level; ARiMR performs central implementing and financial functions; district-office heads decide specified individual matters; voivodeship self-governments may perform clearly bounded tasks; and several specialised systems are connected through PUE. Estonia uses a more compact architecture built around the Ministry of Regional Affairs and Agriculture, PRIA, sectoral authorities, state foundations, local action groups, e-PRIA and integrated registers. Its area-monitoring process confirms that digital indicators acquire legal significance only through communication, correction, evidentiary assessment and an attributable administrative decision.

The principal transferable standard is institutional, procedural and digital coherence. It requires correspondence between competence, workflow, data, technology, evidentiary assessment, responsibility and remedies. The organisational scale of ARiMR or the concentration of Estonian registers is not itself a model for direct transplantation. What Ukraine can and should adopt are the public-law safeguards that make both systems administratively intelligible and legally accountable.

For Ukraine, the immediate priorities are a complete map of agricultural-support functions and authorities; separation of programme management from decision-making in individual cases; interoperable and traceable data governance; applicant-oriented electronic services; special rules for monitoring and automated processing; and phased implementation that distinguishes technical testing from legally effective administration. The Paying Agency remains important within the financial-management chain, but it is only one component of the wider institutional architecture. Reform will be successful when every stage–from scheme design to payment, recovery and review–can be connected to a valid legal basis, a competent public authority, reliable information and an effective procedural safeguard.

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