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WORKING PAPER

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Financial Agricultural Questions
Subject:	Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the financing, management and monitoring of the common agricultural policy and repealing Regulation (EU) No 1306/2013 - Comments from the Greek delegation

Delegations will find attached comments from the Greek delegation on the voted EP amendments on the proposed Horizontal Regulation.

Proposed Horizontal Regulation:
views of delegations on EP's amendments (doc. 12146/20)

Comments from Member State: Greece

AM	Article	Acceptable	Not acceptable (explain why not)	Possibly acceptable subject to re-drafting (provide drafting suggestions)	Comments
272	2(1)b				
272	2(1)c & ca-cf				
39	3(1) -a (new)	Yes			
40	3(1)a	Yes			
41	3(1)a point a (new)	Yes			
42	3(1)a point b (new)	Yes			
43	3(1)b	Yes			
44	3(1)c	Yes			
45	3(1)a (new)	Yes			
46	6(1)	Yes			

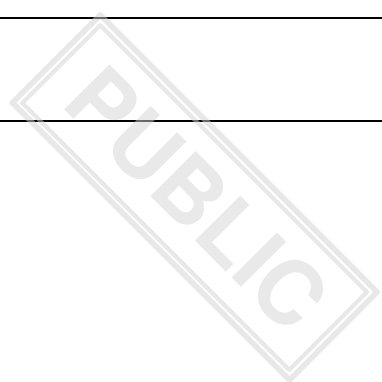
47	7(1)	Yes			
48	7(1)f	Yes			
49	7(1)h	Yes			
50	7 a (new)				
273/rev	8		Not acceptable - Not in line with NDM		
63	9				
222	10 a (new)				
274	11		Not acceptable.		It is not clear. It seems there are extra duties for the Certification Body. These extra duties are not certain that are their responsibility.
74	12(1)				
75	12 a (new)		Not acceptable. We prefer implementation acts instead of delegated acts.		Greece supports the Council General Approach text.
76	14(1) sub 1				
77	14(1) sub 2				
78	14(1) sub 2 a (new)		Not acceptable. We prefer implementation acts instead of delegated acts.		
79 & 242	14(1) sub 3				Not in line with the EUCO conclusions from July.

80	14(2) sub -1 (new)				Not in line with the EUCO conclusions from July.
81	14(2) sub 1				Not in line with the EUCO conclusions from July.
82 & 244	14(2) sub 1 a (new)	Acceptable provided prior use of the assigned revenues and budget margins.			
83	14(2) sub 2				
84 & 247	14(2) sub 3				
85	15(1) sub 1	Yes			
86	15(1) sub 1 a (new)	Yes			Greece supports the amendment. Financial discipline shall only apply to direct payments in excess of 2 000 EUR.
87	19(6)	Yes			
88	22(2)				
89	22(4)				
90	23(1) point b				
91	23(1) point d				
92	23(2)	Yes			
93	29(1) sub 1 point a				Greece is in favor but the amendment is not in line with the EUCO conclusions from July.

94	29(1) sub 1 point b				Greece is in favor but the amendment is not in line with the EUCO conclusions from July.
95	29(3)				
96	29(4)		Not acceptable		Greece supports the Council General Approach text.
97	30(1)		Not acceptable		Greece supports the Council General Approach text.
98	30(4) point a				
99	31(1)				
100	31(3)				
101	32(1)				Not in line with the EUCO conclusions from July.
102	32(3)				Not in line with the EUCO conclusions from July.
103	32(4) sub 1 point a				Not in line with the EUCO conclusions from July.
104	34(2)				
275	35				
109	37(2)	Yes			
110	37(3)	Yes			
276	38		Not acceptable		Greece supports the Council General Approach text.
277	38 a (new)		Not acceptable		Greece supports the Council

					General Approach text.
278	39		Not acceptable		Greece supports the Council General Approach text.
279	39 a (new)		Not acceptable		Greece supports the Council General Approach text.
224	40		Not acceptable		Greece supports the Council General Approach text.
121	42(2) sub 2 point a	Yes			
122	42(3)	Yes			
123	43(2)	Yes			
124	44(1) sub 1				
125	44(1) sub 2				
126	45(1) sub 1				
127	46(1)				
282	47		Not acceptable		Greece supports the Council General Approach text.
132	48(3)				
280	51				
141	52		Not acceptable		Greece supports the Council General Approach text.
281	53		Not acceptable		Greece supports the Council General Approach text.
146	53 a (new		Not acceptable. Greece		

			disagrees with provision of 50-50 rule.		
147	54(1)	Yes			
148	54(1 a) (new)	Yes			
149	55(1) sub 1	Yes			
150	55(1) sub 2				
151	55(1) sub 2 a (new)	Yes			
152	55(1) sub 2 b (new)				
226	57		Not acceptable.		Not in line with the New Delivery Model (beneficiary level)
159	57 a (new)	Yes although the terms “good faith” and “misunderstood” are vague.			
160	58(1) sub 2		Not acceptable.		The Council General Approach text use more flexibility to the MS and it is not exclude the possibility to lower the initial level.
161	58(4) sub 1 point e		Not acceptable.		Greece supports the Council General Approach text.
162	62(3) point a	Yes			



163-179	IACS: Arts. 63-73				see following details
172		It could be accepted because gives more time for the creation of the area monitoring system (AMS)			
	73				Greece supports the Council General Approach text.
178			Not acceptable. We prefer implementation acts instead of delegated acts.		Greece supports the Council General Approach text.
180	78(2)				
181	79		Not acceptable		Greece supports the Council General Approach text.
182-202	Controls / penalties: Arts. 84-87		Not acceptable. We prefer the Council proposal.		Greece supports the Council General Approach text.
230	96(1)				
203	100 a (new)				
204	102(1) sub 2 point a				
205	103				

At the end we would like to point out that Greece strongly disagrees with the *Amendment 16 - Recital 16 a (new)*. This is an arbitrary conclusion, not in line with the EUCO conclusions *and should be deleted*.

