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## **CONTRIBUTION**

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From:	General Secretariat of the Council
To:	Working Party on Horizontal Agricultural Questions (Post-2027 CAP)
N° Cion doc.:	ST 11733 2025 ADD 1 COR 1 + ST 11733 2025 ADD 1 + ST 11733 2025 INIT
Subject:	Regulation establishing the conditions for the implementation of Union support under the CAP - Comments from Latvia on block I

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**Written comments on Articles 1, 2 and 5 of the CAP proposal.**

**Comments from Latvia**

CAP proposal	Comments from Latvia
<p><b>Articles 1</b> <b>Subject matter</b></p>	
<p>In order to ensure a strong, sustainable and resilient common agricultural policy, Union food security, generational renewal and vibrant rural areas, this Regulation lays down specific conditions for the implementation of the Union support for the common agricultural policy (CAP) in accordance with the general objective laid down in Article 2, point (c), of Regulation (EU) [...] [NRP]. This Union support shall be provided under the National and Regional Partnership Fund (the ‘Fund’) in accordance with the rules governing that Fund laid down in Regulation (EU) [...] [NRP].</p>	<p>The CAP must be maintained as a separate targeted support policy for farmers and rural development with adequate EU budget funding. CAP should keep its framework and be implemented within CAP Strategic plan.</p> <p><del>This Union support shall be provided under the National and Regional Partnership Fund (the ‘Fund’) in accordance with the rules governing that Fund laid down in Regulation (EU) [...] [NRP].</del></p> <p><b><u>This Union support shall be financed by the CAP fund under a CAP Strategic Plan drawn up by a Member State and approved by the Commission.</u></b></p>
<p><b>Articles 2</b> <b>CAP national recommendations and steering</b></p>	
<p>1. The Commission shall adopt CAP national recommendations providing guidance to each Member State for the implementation of the CAP-relevant specific objectives set out in Article 3, point (d), of Regulation (EU) [...] [NRP], within their NRP Plans in line with Article 22 of that Regulation in advance of the submission of the NRP Plans by the Member States. The CAP national recommendations shall be based on the following:</p> <p>(a) contribution to fair and sufficient income for farmers and their long-term competitiveness, including the farmers’ position in the value chain;</p> <p>(b) improvement of attractiveness of the profession and foster generational renewal;</p> <p>(c) enhancing climate action, ecosystem services provision, circular solutions, the conservation of biodiversity and natural resources, sustainable farming and improve animal welfare;</p> <p>(d) improving resilience, farmers’ preparedness and ability to cope with crises and risks;</p> <p>(e) enhancing the access to knowledge and accelerate innovation and the digital transition for a thriving agri-food sector.</p> <p>The CAP national recommendations may be updated by the Commission, as appropriate.</p> <p>2. The Commission shall base the CAP national recommendations on an analysis of the situation of the agricultural sector and rural areas, including demographic factors, structural and territorial characteristics as well as food security in each Member State.</p>	<p>Recommendations should be only as a guidance in nature and should not be binding on Member States. Member States are not obliged to fully implement the recommendations. This should be clearly stated in the regulation.</p> <p>Article 2 shall include/set the deadline for the recommendations. Considering the time needed to draw the plan, the recommendations must be available by March 2026.</p> <p>Point 1 of Article 2 should include provisions specifying the circumstances and procedure under which the Commission may update the recommendations.</p> <p>Point 2 of Article 2 should include provisions that recommendations also provide information and links to the sources of funding and the instruments of the NRP plan.</p>

3. In the CAP national recommendations, the Commission shall in particular identify key challenges to be addressed by each Member State in their NRP Plan, on the basis of the CAP-relevant specific objectives set out in Article 3, point (d), of Regulation (EU) [...] [NRP].

**Articles 5**  
**Types of support**

1. The following CAP interventions are set out:
- (a) degressive area-based income support;
  - (b) coupled income support;
  - (c) crop specific payment for cotton;
  - (d) payment for natural and other area specific constraints;
  - (e) support for disadvantages resulting from certain mandatory requirements;
  - (f) agri-environmental and climate actions;
  - (g) payment for small farmers;
  - (h) support for risk management tools;
  - (i) support for investments for farmers and forest holders;
  - (j) support for setting-up of young farmers, new farmers, rural business and start-ups and development of small farms;
  - (k) support for farm relief services;
  - (l) LEADER;
  - (m) support for knowledge sharing and innovation in agriculture, forestry and rural areas;
  - (n) territorial and local cooperation initiatives;
  - (o) interventions in outermost regions;
  - (p) interventions in smaller Aegean islands;
  - (q) EU school scheme referred to in Title I, Part II, Chapter IIa, of Regulation (EU) No 1308/2013 of the European Parliament and of the Council;
  - (r) interventions in certain sectors referred to in Title I, Part II, Chapter IIa, of Regulation (EU) No 1308/2013;
  - (s) crisis payments for farmers.
2. Interventions referred to in paragraph 1, points (a) to (k), and interventions in certain sectors referred to in Title I, Part II, Chapter IIa, of Regulation (EU) No 1308/2013 shall be income support interventions to be financed from the Fund in accordance with Article 10(2), point (a), second subparagraph, of Regulation (EU) [...] [NRP].
3. Production of hemp varieties with Tetrahydrocannabinol (THC) content exceeding 0,3% shall not be eligible for support under this Regulation.



The CAP proposal includes too many mandatory interventions. How does this fit within the CAP recommendations set in Article 2? Will the greater CAP finding be provided to ensure effective implementation of all CAP interventions?  
There should be more flexibility for Member States to choose based on their specific situation which interventions are of the most importance for them. Especially if several interventions lack specific financial coverage.

It is unacceptable that CAP measures that are essential for Latvia, such as LEADER and local cooperation initiatives, the knowledge and innovation block, the EU school programme and crisis payments, are left without a clear source of EU funding. Even if these are measures under the common plan, they must have ring-fenced funding.

Why are the cooperation measures not mentioned as a separate type of measure in Article 5? Does this mean that there are changes in the legal structure (e.g., merging with other types), or cooperation will be addressed in other legislation?

3. Why eligibility conditions for hemp area are not included in the definition of eligible hectares but are fixed here in Article 5 even if no specific type of support is provided for them?