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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
N° Cion doc.:	ST 11722 2025 ADD 1 + ST 11722 2025 INIT
Subject:	Regulation amending Regulation (EU) No 1308/2013 (CMO) as regards the school scheme, sectoral interventions, the protein sector, hemp, marketing standards, import duties, the availability of supplies and securities - Drafting suggestions and comments from the Member States on Annexes

Guidelines to be followed

Please kindly provide your contributions in the table below.

Drafting suggestions: you may use '**track changes**'* or formatting (for example **bold-underline** for additions and ~~strike-through~~ for deletions, **where necessary, in a different colour**). *Track changes can only be connected once the cursor is placed in editable areas (Drafting or Comments columns).

To make it feasible to consolidate all contributions, the structure of the table must not be changed, so **no rows can be added or deleted**.

New provisions may only be added in any of the '**existing cells**'.

Name of document: please add the **two initials** of your delegation's country followed by a space (to the MS Word document name), followed by any optional text, for example, for Austria: **AT comments ondocx**

Thank you for your cooperation!

Commission proposal		Drafting suggestions and Comments
ANNEX I		
(1) Annex I is amended as follows:		
(a) Part IV is replaced by the following:		
<i>'PART IV</i>		
<i>Protein crops</i>		
The protein crops sector shall cover the products listed in Sections 1 and 2 of this Part.		
Section 1		
Dried leguminous vegetables		
CN code	Description	
ex 0713	Dried leguminous vegetables, shelled, whether or not skinned or split:	
ex 0713 10	– Peas (<i>Pisum sativum</i>):	
0713 10 90	– – Other than for sowing	

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ex 0713 20 00	– Chickpeas (garbanzos), other than for sowing	
	– Beans (<i>Vigna</i> spp., <i>Phaseolus</i> spp.):	
ex 0713 31 00	– – Beans of the species <i>Vigna mungo</i> (L) Hepper or <i>Vigna radiata</i> (L) Wilczek, other than for sowing	
ex 0713 32 00	– – Small red (Adzuki) beans (<i>Phaseolus</i> or <i>Vigna angularis</i>), other than for sowing	
ex 0713 33	– – Kidney beans, including white pea beans (<i>Phaseolus vulgaris</i>):	
0713 33 90	– – – Other than for sowing	
ex 0713 34 00	– – Bambara beans (<i>Vigna subterranea</i> or <i>Voandzeia subterranea</i>), other than for sowing	
ex 0713 35 00	– – Cow peas (<i>Vigna unguiculata</i>), other than for sowing	
ex 0713 39 00	– – Other , other than for sowing	
ex 0713 40 00	– Lentils , other than for sowing	
ex 0713 50 00	– Broad beans (<i>Vicia faba</i> var. major) and horse beans (<i>Vicia faba</i> var. equina and <i>Vicia faba</i> var. minor), other than for sowing	
ex 0713 60 00	– Pigeon peas (<i>Cajanus cajan</i>), other than for sowing	
ex 0713 90 00	– Other, other than for sowing	
1201 90 00	Soya beans, whether or not broken, other than seed	
1202 41 00	Groundnuts, not roasted or otherwise cooked, in shell, other than seed	

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1202 42 00	Ground-nuts, not roasted or otherwise cooked, shelled, whether or not broken, other than seed	
ex 1209 29 45	Vetch seed, other than for sowing	
ex 1209 29 50	Lupine seed, other than for sowing	
Section 2		
Leguminous fodder		
1214 10 00	– Lucerne (alfalfa) meal and pellets	
ex 1214 90 90	– Lucerne, sainfoin, clover, lupins, vetches, honey lotus, chickling pea, birdsfoot and similar leguminous fodder products	<p>PL (Drafting suggestions): ex 1214 90 90 – Lucerne, sainfoin, clover, lupins, vetches, honey lotus, chickling pea, birdsfoot, saradel (ornithopus), pea (lathyrus), pelushka (pisum sativum subsp. arvense) and other similar fodder leguminous plants</p> <p>PL (Comments): We suggest that these leguminous fodder plants to be included explicitly in the Annex as in Poland they are covered by coupled payments</p>
(b) in Part VIII, the following rows are added:		
'1204 00 90 Linseed, whether or not broken, other than for sowing		
1207 99 91 Hemp seeds, whether or not broken, other than for sowing		
ex 1211 90 86 Other parts of the hemp plant?;		
(c) in Part XXIV, Section 1 is amended as follows:		
(a) the rows included in heading ex 0713 are deleted;		

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(b) the rows concerning CN code 1201 90 00, 1202 41 00 and 1202 42 00 are deleted;	
(c) the rows included in heading ex 1214 are replaced by the following:	
‘ex 1214 Swedes, mangolds, fodder roots, hay, forage kale, and similar forage products, whether or not in the form of pellets:	
ex 1214 90 – Other:	
1214 90 10 – – Mangolds, swedes and other fodder roots	
ex 1214 90 90 – – Other, excluding leguminous fodder’;	
(d) the rows concerning CN codes 1204 00 90 and	
1207 99 91 are deleted;	
(e) the description in the entry concerning the heading ex 1211 is replaced by the following:	
‘Plants and parts of plants (including seeds and fruits) of a kind used primarily in perfumery, in pharmacy or for insecticidal, fungicidal or similar purposes, fresh or dried, whether or not cut, crushed or powdered excluding the products listed under CN code ex 1211 90 86 in Part VIII and IX;’;	
(f) the description in the entry concerning headings ex 2309 90 91 to 2309 90 96 is replaced by the following:	
‘– – – Other than containing starch, glucose, glucose syrup, maltodextrine or maltodextrine syrup of subheadings 1702 30 50, 1702 30 90, 1702 40 90, 1702 90 50 and 2106 90 55 or milk products’;	<p>SE (Drafting suggestions): <u>ANNEX Ib</u> <u>Sector interventions can be made in the following sectors as listed in the respective parts of Annex I:</u></p>

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	<p> i) <u>Cereals, Part I</u> ii) <u>Rice, Part II</u> iii) <u>Sugar, Part III</u> iv) <u>Protein crops, Part IV</u> v) <u>Seeds, Part V</u> vi) <u>Hops, Part VI</u> vii) <u>Olive oil and table olives, Part VII</u> viii) <u>Flax and hemp, Part VIII</u> ix) <u>Fruit and vegetables, Part IX</u> x) <u>Bananas, Part XI</u> xi) <u>Wine, Part XII</u> xii) <u>Live trees and other plants, bulbs, roots and the like, cut flowers and ornamental foliage, Part XIII</u> xiii) <u>Beef and veal, Part XV</u> xiv) <u>Milk and milk products, Part XVI</u> xv) <u>Pigmeat, Part XVII</u> xvi) <u>Sheepmeat and goatmeat, Part XVIII</u> xvii) <u>Eggs, Part XIX</u> xviii) <u>Poultrymeat, Part XX</u> xix) <u>Agriculture products, Part XXII</u> <u>Silkworms, Part XXIII</u> SE (Comments): Proposed new Annex Ib following Annex Ia. </p>
<p>(2) in Annex II, Part II, Section A, points 5 and 6 are replaced by the following:</p>	

Commission proposal	Drafting suggestions and Comments
‘5. A "delivery contract" means a contract concluded between a seller and an undertaking for the delivery of beet or sugar cane for the manufacture of sugar.	
6. "Agreement within the trade" means one of the following:	
(a) an agreement concluded, prior to the conclusion of any delivery contract, between undertakings or an undertakings' organisation recognised by the Member State concerned, or a group of such undertakings' organisations, on the one hand and a beet or sugar cane sellers' association recognised by the Member State concerned or a group of such sellers' organisations on the other;	
(b) in the absence of any agreement as referred to in point (a), the law on companies and the law on cooperatives, in so far as they govern the delivery of sugar beet and sugar cane by the shareholders or members of a company or cooperative manufacturing sugar.’;	
(3) in Annex IV, Part B, Section IV, point 1 is replaced by the following:	
‘1. The lean-meat content shall be assessed by means of grading methods authorised by Member States. Only statistically proven assessment methods based on the physical measurement of one or more anatomical parts of the pig carcass may be authorised. Authorisation of grading methods shall be subject to compliance with a maximum tolerance for statistical error in assessment.’;	<p>RO (Comments): RO comments: We consider it essential that the transfer of competences to be accompanied by a minimum common framework and transparency mechanisms, in order to guarantee the comparability and credibility of the results of the classification of pig carcasses. The transfer of competences should be on condition that the other obligations provided for in Regulation (EU) No. 1308/2013 and the related delegated and implementing acts (presentation, weighing, marking of carcasses, qualification of classifiers and price reporting), are fully respected.</p>
(4) in Annex VII, the following Part is inserted:	

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‘PART Ia	
<p><i>Meat and meat products designations</i></p>	<p>SE (Drafting suggestions):</p> <p>Delete</p> <p>SE (Comments):</p> <p>There are no indications that consumers are being misled by designations of this nature. This article would result in regulatory complexities and burdens for food companies, seemingly without need. Sweden is of the view that overregulation must be avoided.</p> <p>Furthermore, there are already extensive rules on labelling which prohibit misleading communication to consumers in, for instance, article 7 of Regulation (EU) 1169/2011.</p> <p>Providing consumers with the correct designation of a food product is also mandatory under article 9.1. of Regulation (EU) 1169/2011 and article 17 of the same regulation clarifies what this means.</p> <p>Definitions of meat already exist in e.g. Regulation (EC) 853/2004 and these definitions are also referenced in Regulation (EU) 1169/2011.</p> <p>Regulating meat designations in the CMO risks creating deviating and conflicting rules as well as spreading rules across different regulatory frameworks making a comprehensive and streamlined overview more difficult.</p> <p>Furthermore the proposed Part 1a would only be applicable to the sectors and products listed in article 78 of the CMO, thereby raising questions regarding other meat products categories such as game and horse meat.</p> <p>Finally, there is an issue of translations and taking into account linguistic and cultural</p>

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	<p>specificities, including words like beef tomato.</p> <p>NL (Drafting suggestions): <i>Meat and meat products designations</i></p> <p>NL (Comments): The Netherlands (following the adoption of a parliamentary motion) is of the opinion that the preservation of recognizable and common names for meat substitutes needs to be prioritized. The Netherlands supports transparency about the ingredients and nutritional value of food products. Existing European legislation (incl. FIC regulation 1169/2011) contributes to this. Also, the Netherlands is reluctant to introduce legislation that would hinder innovation in the food industry and more specifically innovative products such as products from cellular agriculture and hybrid products of animal and vegetable composition.</p> <p>ES (Drafting suggestions): Meat and meat products <u>names designations</u></p> <p>ES (Comments): Spain has been a pioneer in protecting terms used in the meat sector since 2014 and therefore supports the need for legislative harmonisation at EU level to protect terms linked to foods of animal origin, so that such</p>

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	<p>regulation and protection are included within the framework of the CMO, as is already the case for the dairy sector.</p> <p>We consider it necessary to include in the proposed amendment the definitions set out in Regulation (EC) No 853/2004.</p> <p>Finally, as already mentioned, Spain has regulations that also protect terms such as sausage and burger, among others, and we would welcome extending this protection to our traditional descriptions and denominations established by usage, aligning the proposed amendment of the CMO Regulation with Spanish legislation.</p>
<p>1. "Meat" means exclusively the edible parts of an animal.</p>	<p>SE (Drafting suggestions): <i>Delete</i></p> <p>SK (Drafting suggestions):</p> <p>1. "Meat" means exclusively the edible parts of an animal, in accordance with Annex I, point 1.1 of Regulation (EC) No 853/2004.</p> <p>SK (Comments):</p> <p>“In Part 1a, point 1, Slovakia proposes to incorporate the full definition of ‘meat’ in accordance with Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin, or to provide a legislative reference to that Regulation, as, for example, the term ‘blood’</p>

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	<p>is not covered by the current wording of the definition of meat in Regulation (EU) No 1308/2013 (CMO). Slovakia does not consider it appropriate to establish two different legal definitions of the term ‘meat’, as such an approach could give rise to interpretative uncertainties in practice and lead to an inconsistent application of the legal framework.”</p> <p>NL (Drafting suggestions): 1. "Meat" means exclusively the edible parts of an animal.</p> <p>HU (Drafting suggestions): <i>“Meat” means the term defined in point 1.1 of Annex I to Regulation (EC) No 853/2004 of the European Parliament and of the Council.</i></p> <p>HU (Comments): <i>Regulation (EC) No 853/2004 provides an appropriate definition of meat. This term should be defined uniformly.</i></p> <p>ES (Drafting suggestions): 1. "Meat" means exclusively the edible parts of an animal <u>referred to in points 1.2 to 1.8 of Annex I to Regulation (EC) No 853/2004, including blood.</u></p> <p>EE (Comments): Clarification would be needed how to implement the definition together with the existing definitions in Regulation (EC) No 853/2004?</p>

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	<p>CZ (Drafting suggestions):</p> <p>“meat” means edible parts of the animals referred to in points 1.2 to 1.8 of Annex I to Regulation (EC) No 853/2004, including blood. The meat-related terms and names that fall under Article 17 of Regulation (EU) No 1169/2011 and are currently used for meat and meat cuts shall be reserved exclusively for the edible parts of the animals.</p> <p>CZ (Comments):</p> <p>The proposed amendment is based on the need to clearly and consistently define terms related to meat and meat products in accordance with current legislation, in particular Regulation (EC) No. 853/2004 of the European Parliament and of the Council, which lays down specific hygiene rules for food of animal origin. The aim is to ensure that the definitions used fully comply with existing legal requirements and that no new, unclear or duplicative interpretations arise that could lead to confusion.</p>
<p>2. For the purposes of this Part, "meat products" means products derived exclusively from meat, on the understanding that substances necessary for their manufacture may be added provided that those substances are not used for the purpose of replacing, in whole or in part, any meat constituent.</p>	<p>SE (Drafting suggestions):</p> <p><i>Delete</i></p> <p>PL (Drafting suggestions):</p> <p>2. For the purposes of this Part, "meat products" means products derived exclusively from meat, on the understanding that substances necessary for their manufacture may be added provided that those substances are not used for the purpose of replacing, in whole or in part, any meat constituent.</p> <p>PL (Comments):</p> <p>We think that the wording on adding substances is too strict and may hinder normal and recognised technological process of meat products production.]</p>

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	<p>NL (Drafting suggestions):</p> <p>2. For the purposes of this Part, "meat products" means products derived exclusively from meat, on the understanding that substances necessary for their manufacture may be added provided that those substances are not used for the purpose of replacing, in whole or in part, any meat constituent.</p> <p>HU (Comments):</p> <p><i>We do not consider the proposed definition to be adequate, as it is not clear whether the use of certain ingredients currently used in the production of meat products (e.g. soy, mechanically separated meat (MSM)) constitutes a meat substitute. It is necessary to define what is meant in the proposal the "substances necessary for their manufacture ... that those substances are not used for the purpose of replacing". The current proposal may unjustifiably exclude traditional products, as well as products regulated and unregulated at Member State level, from the definition of meat product. Regulation (EC) No 853/2004 also contains an interpretative provision on the definition of meat product, which we also recommend taking into account.</i></p> <p>GR (Comments):</p> <p>Considering consumers' protection and the need for clear, accurate and non-misleading information, it is not possible to support the use of terminology and trade names for products of non-animal origin, when this nomenclature refers directly or indirectly to products of animal origin. It is considered that this practice may create confusion and/or deception as to the nature, composition and real characteristics of the products, affecting the correct choice of the consumer. For this reason, we consider it necessary to ensure a clear separation in the nomenclature and mandatory, clear</p>

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	<p>labeling, so that it becomes absolutely clear that the specific products are of non-animal origin and are not associated with meat products.</p> <p>ES (Drafting suggestions):</p> <p>2. For the purposes of this Part, "meat products" means processed products derived exclusively from meat, on the understanding that substances necessary for their manufacture may be added provided that those substances are not used for the purpose of replacing, in whole or in part, any meat constituent. <u>Pursuant to this paragraph, cell-cultured products are not deemed to comply the definition of "meat product".</u></p> <p><u>2a. 'Meat preparations' means fresh meat, including meat that has been reduced to fragments, which has had foodstuffs, seasonings or additives added to it, or which has undergone processes that do not alter the internal muscle fibre structure of the meat enough for the characteristics of fresh meat to be eliminated.</u></p> <p>CZ (Drafting suggestions):</p> <p>„Meat preparations” means fresh meat, including meat that has been reduced to fragments, which has had foodstuffs, seasonings or additives added to it, or which has undergone processes that do not alter the internal muscle fibre structure of the meat enough for the characteristics of fresh meat to be eliminated.</p> <p>„Meat products” means processed products resulting from the processing of meat or from the further processing of such processed products, so that the cut surface shows that the product no longer has the characteristics of fresh meat. Names that fall under Article 17 of Regulation (EU) No 1169/2011 that are currently used for meat products and meat preparations shall be reserved exclusively for products containing meat.</p>

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	<p>These names include, for example: ham, sausage, pâté, salami, meatball.</p> <p>Mentioned names shall not be used for any product other than the products referred to and shall exclude cell-cultured products.</p> <p>CZ (Comments):</p> <p>At the same time, it is proposed to add the most commonly used names of meat products that are traditionally widespread on the market and well known to consumers, yet are often misused to label food of plant origin.</p> <p>Adding commonly used names will help consumers to better navigate the market, support the preservation of traditional production methods, and contribute to greater consumer protection against possible misleading or inconsistent product labeling.</p>
<p>3. The following names shall be reserved for products derived exclusively from meat at all stages of marketing:</p>	<p>SE (Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK (Drafting suggestions):</p> <p>3. The following names shall be reserved for products derived exclusively from meat at all stages of marketing:</p> <p>I.</p> <p>NL (Drafting suggestions):</p> <p>3. The following names shall be reserved for products derived exclusively from meat at all stages of marketing:</p> <p>LT (Drafting suggestions):</p>

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	<p>To add to the list: (dd) sausage; (ee) steak; (ff) ham; (gg) fatback/ sowbelly; (hh) rabbit; (ii) horse meat.</p> <p>LT (Comments):</p> <p>The list should be expanded; otherwise the use of certain names traditionally associated with meat would remain undefined. We suggest including terms such as: "sausage", "steak", "ham", "fatback", "sowbelly". It would also be appropriate to expand the list to include such animal species as rabbit and horse meat.</p> <p>ES (Drafting suggestions):</p> <p>The following names shall be reserved for products derived exclusively from meat at all stages of marketing:</p> <p><u>3. Names that fall under Article 17 of Regulation (EU) No 1169/2011 that are currently used for meat as referred to paragraph 1, meat products as referred to paragraph 2 and meat preparations as referred to paragraph 2a, shall be reserved exclusively for edible parts of the animals and products containing meat and include for example:</u></p>
(a) Beef;	<p>SE (Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(a) Beef;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(a) Beef;</p>
(b) Veal;	<p>SE</p> <p>(Drafting suggestions):</p> <p>Delete</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(b) Veal;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(b) Veal;</p>
(c) Pork;	<p>SE</p> <p>(Drafting suggestions):</p> <p>Delete</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(c) Pork;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(e) Pork;</p>
(d) Poultry;	<p>SE</p> <p>(Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p><i>Delete</i></p> <p>SK (Drafting suggestions): (d) Poultry;</p> <p>NL (Drafting suggestions): (d) Poultry;</p>
(e) Chicken;	<p>SE (Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK (Drafting suggestions): (e) Chicken;</p> <p>NL (Drafting suggestions): (e) Chicken;</p>
(f) Turkey;	<p>SE (Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK (Drafting suggestions): (f) Turkey;</p> <p>NL (Drafting suggestions): (f) Turkey;</p>

Commission proposal	Drafting suggestions and Comments
(g) Duck;	SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (g) Duck; NL (Drafting suggestions): (g) Duck;
(h) Goose;	SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (h) Goose; NL (Drafting suggestions): (h) Goose;
(i) Lamb;	SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (i) Lamb; NL

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	<p>(Drafting suggestions):</p> <p>(i) Lamb;</p>
(j) Mutton;	<p>SE</p> <p>(Drafting suggestions):</p> <p>Delete</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(j) Mutton;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(j) Mutton;</p>
(k) Ovine;	<p>SE</p> <p>(Drafting suggestions):</p> <p>Delete</p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(k) Ovine;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(k) Ovine;</p>
(l) Goat;	<p>SE</p> <p>(Drafting suggestions):</p> <p>Delete</p> <p>SK</p> <p>(Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	(l) Goat; NL (Drafting suggestions): (l) Goat;
(m) Drumstick;	SE (Drafting suggestions): Delete SK (Drafting suggestions): (m) Drumstick; NL (Drafting suggestions): (m) Drumstick;
(n) Tenderloin;	SE (Drafting suggestions): Delete SK (Drafting suggestions): (n) Tenderloin; NL (Drafting suggestions): (n) Tenderloin;
(o) Sirloin;	SE (Drafting suggestions): Delete

Commission proposal	Drafting suggestions and Comments
	SK (Drafting suggestions): (o) Sirloin; NL (Drafting suggestions): (o) Sirloin;
(p) Flank;	SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (p) Flank; NL (Drafting suggestions): (p) Flank;
(q) Loin;	SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (q) Loin; NL (Drafting suggestions): (q) Loin;
(r) Ribs;	SE

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(r) Ribs;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(r) Ribs;</p>
(s) Shoulder;	<p>SE</p> <p>(Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(s) Shoulder;</p> <p>NL</p> <p>(Drafting suggestions):</p> <p>(s) Shoulder;</p>
(t) Shank;	<p>SE</p> <p>(Drafting suggestions):</p> <p><i>Delete</i></p> <p>SK</p> <p>(Drafting suggestions):</p> <p>(t) Shank;</p> <p>NL</p> <p>(Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
(u) Chop;	<p>(t) Shank;</p> <p>SE (Drafting suggestions): Delete</p> <p>SK (Drafting suggestions):</p> <p>(u) Chop;</p> <p>NL (Drafting suggestions):</p> <p>(u) Chop;</p>
(v) Wing;	<p>SE (Drafting suggestions): Delete</p> <p>SK (Drafting suggestions):</p> <p>(v) Wing;</p> <p>NL (Drafting suggestions):</p> <p>(v) Wing;</p>
(w) Breast;	<p>SE (Drafting suggestions): Delete</p> <p>SK (Drafting suggestions):</p> <p>(w) Breast;</p>

Commission proposal	Drafting suggestions and Comments
	NL (Drafting suggestions): (w) — Breast;
(x) Thigh;	SE (Drafting suggestions): Delete SK (Drafting suggestions): (x) Thigh; NL (Drafting suggestions): (x) — Thigh;
(y) Brisket;	SE (Drafting suggestions): Delete SK (Drafting suggestions): (y) Brisket; NL (Drafting suggestions): (y) — Brisket;
(z) Ribeye;	SE (Drafting suggestions): Delete SK

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	<p>(Drafting suggestions): (z) Ribeye; NL (Drafting suggestions): (z) Ribeye;</p>
(aa) T-bone;	<p>SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (aa) T-bone; NL (Drafting suggestions): (aa) T bone;</p>
(bb) Rump;	<p>SE (Drafting suggestions): <i>Delete</i> SK (Drafting suggestions): (bb) Rump; NL (Drafting suggestions): (bb) Rump;</p>
(cc) Bacon.	<p>SE (Drafting suggestions):</p>

Commission proposal	Drafting suggestions and Comments
	<p><i>Delete</i></p> <p>SK (Drafting suggestions):</p> <p>(cc) Bacon.</p> <p>II. Names, within the meaning of Article 17 of Regulation (EU) No 1169/2011, which are genuinely used for meat products.</p> <p>SK (Comments):</p> <p>The Slovak Republic does not perceive a need for specific protection of selected names of carcasses, as in practice it is not possible to obtain, for example, poultry meat other than from the edible parts of a carcass. A comparable principle applies to dairy products. By contrast, the Slovak Republic considers it necessary to protect the names of meat and dairy products, the designations of which should not be used to label plant-based ‘alternatives’, with a view to preventing consumer deception and ensuring the clarity of information on the nature of the product.</p> <p>In this context, account should also be taken of the judgment of the Court of Justice of the European Union in Case C-438/23, in which the Court concluded that it is not permissible to use names defined by law (legal names) to designate plant-based ‘alternatives’, even where such names are accompanied by the terms ‘vegan’ or ‘vegetarian’. This, however, does not apply to customary animal-based names or descriptive animal-based names.</p> <p>For these reasons, Slovakia proposes, in Part 1a, point 3, to designate subpoint I and to introduce a new subpoint II with the following wording: ‘names within the meaning of Article 17 of Regulation (EU) No 1169/2011 that are actually used for meat products’.</p> <p>In the current wording of Regulation (EU) No 1308/2013 (CMO), this principle is already established for dairy products.</p> <p>NL</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(ee) Bacon.</p> <p>ES</p> <p>(Drafting suggestions):</p> <p>(cc) Bacon.</p> <p><u>(dd) Steak</u></p> <p><u>(ee) Escalope</u></p> <p><u>(ff) Sausage</u></p> <p><u>(gg) Burger</u></p> <p><u>(hh) Hamburger</u></p> <p><u>(ii) Other products protected by national legislation, such as chorizo, sobrasada, chistorra, morcilla.</u></p> <p><u>This is without prejudice to the use of these terms for fishery and aquaculture products.</u></p> <p>BE</p> <p>(Drafting suggestions):</p> <p><u>(dd) rabbit</u></p> <p><u>(ee) horse</u></p> <p>BE</p> <p>(Comments):</p> <p>Belgium prefers a delimited list as proposed by the Commission. Open, general definitions such as proposed by the EP under "meat" lack clarity and will lead to confusion with market regulators, producers and consumers</p>
<p>4. The term 'meat' and the designations listed in point 3 may also be used in association with a word or words to designate composite products of which no part takes or is intended to take the place of any meat constituent and of which meat is</p>	<p>SE</p> <p>(Drafting suggestions):</p> <p>Delete</p>

Commission proposal	Drafting suggestions and Comments
<p>an essential part either in terms of quantity or for characterisation of the product.’;</p>	<p>SK (Comments): The Slovak Republic would welcome an exchange of views with the European Commission and experts from the Member States on whether selected food names within the meaning of Article 17 of Regulation (EU) No 1169/2011, as well as the names of meat and dairy products under the current and proposed Regulation (EU) No 1308/2013 (CMO), could be considered for protection under Article 10(7), in a manner comparable to names defined by law for spirit drinks under Regulation (EU) 2019/787. In this context, clarification may be useful as to the permissibility of using animal-based product names in the labelling of plant-based foods, including where such names are combined with terms such as ‘type’, ‘style’ or ‘flavour’</p> <p>NL (Drafting suggestions): 4. The term 'meat' and the designations listed in point 3 may also be used in association with a word or words to designate composite products of which no part takes or is intended to take the place of any meat constituent and of which meat is an essential part either in terms of quantity or for characterisation of the product.’;</p> <p>LT (Comments): The term “composite products” is used without a clear definition, we believe a definition of this term should be included in the proposal text for clarity purposes.</p> <p>ES (Drafting suggestions): 4. The term 'meat' and the designations listed in point 3 may also be used in association with a word or words to designate composite products of which no part takes or is intended to take the place of any meat constituent and of which meat is an essential part either in terms of quantity or for characterisation of the product.’;</p>

Commission proposal	Drafting suggestions and Comments
	<p><u>5. Those names shall also be protected from any misuse, imitation or evocation, even if the composition or true nature of the product or service is indicated or accompanied by an expression such as “style”, “type”, “method”, “as produced in”, “imitation”, “flavour”, “substitute”, “like” or similar.</u></p> <p>BE (Drafting suggestions):</p> <p><u>However, this provision shall not apply to the designation of products the exact nature of which is clear from traditional usage and/or when the designations are clearly used to describe a characteristic quality of the product.</u></p> <p>BE (Comments):</p> <p>Please include this amendment to accommodate existing terms such as ‘vleestomaat’. A similar derogation can also be found in the corresponding chapter concerning milk</p>
(5) Annex X is amended as follows:	
(a) the title of the Annex is replaced by the following:	
‘PURCHASE TERMS REFERRED TO IN ARTICLE 125(3)’;	
(b) after the title, the following title of Part I is inserted:	
‘PART I	
<i>Purchase terms for beet’;</i>	<p>NL (Drafting suggestions):</p> <p><i>Purchase terms for beet’;</i></p>
(c) in point VIII, point 1 is replaced by the following:	<p>NL (Drafting suggestions):</p> <p>(e) — in point VIII, point 1 is replaced by the following:</p>

Commission proposal	Drafting suggestions and Comments
<p>'1. Delivery contracts shall provide that the pulp obtained from the whole quantity of beet delivered shall be considered the property of the beet seller and shall require sugar undertakings to do one or more of the following with respect to that pulp:</p>	<p>RO (Comments): RO comments: Regarding the conditions for purchasing beet, (amendment to point VIII of Annex X), described in Part II, Section A, point 6 of Annex II, we consider that the sale of beet includes the entire root/body of the beet, and not just its sugar content, as could be interpreted in the current form of the amendment. Traditionally, wet beet pulp was handed over free of charge to the farmer delivering the sugar beet, to the economic operator/sugar factory. Partial drying or even the production of pellets involves costs that must be recovered from the beneficiaries, and these costs have, for years, been negotiated without problems directly between farmers and processors and provided for in the contract concluded between the farmer and the processing factory. Moreover, in the event that farmers do not take the pulp resulting from the processing of sugar beet, the operator could request storage fees or, in extreme cases, destroy (at the farmer's expense) this valuable organic matter, which could otherwise be used</p> <p>NL (Drafting suggestions): '1. Delivery contracts shall provide that the pulp obtained from the whole quantity of beet delivered shall be considered the property of the beet seller and shall require sugar undertakings to do one or more of the following with respect to that pulp:</p> <p>NL (Comments): The Netherlands does not yet see the added value of the provisions/specification regarding beet pulp. This would create additional administrative burdens for farmers, and particularly for cooperatives (which already have such arrangements through internal regulations). As far as the Netherlands is concerned, these provisions can be deleted. It is reducing also overall complexity in the CMO regulation.</p> <p>AT</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>‘1. Delivery contracts shall provide that the pulp obtained from the whole quantity of beet delivered shall be considered the property of the beet seller and shall require sugar undertakings to do one or more of the following with respect to that pulp:</p> <p><u>1. Delivery contracts shall require sugar undertakings to do one or more of the following for the whole quantity of beet delivered:</u></p> <p>AT (Comments):</p> <p>AT prefers to keep the text from the current regulation. In Austria, it is common practice for these issues to be negotiated jointly between sugar beet growers and sugar undertaking within the framework of agreements.</p>
<p>(a) to return all or part of the pulp, fresh, free of charge, to the beet seller, ex-factory;</p>	<p>NL (Drafting suggestions):</p> <p>(a) to return all or part of the pulp, fresh, free of charge, to the beet seller, ex-factory;</p> <p>AT (Drafting suggestions):</p> <p>(a) to return all or part of the pulp, fresh, free of charge, to the beet seller, ex-factory;</p> <p><u>(a) to return the fresh pulp from the tonnage of beet delivered free of charge to the beet seller, ex-factory;</u></p>
<p>(b) to return part of that pulp, pressed, dried or dried and molassed, free of charge to the beet seller, ex-factory. In this case, the part of the pulp to be retained by the sugar undertaking, free of charge, shall be stipulated in the delivery contract;</p>	<p>NL (Drafting suggestions):</p> <p>(b) to return part of that pulp, pressed, dried or dried and molassed, free of charge to the beet seller, ex-factory. In this case, the part of the pulp to be retained by the sugar undertaking, free of charge, shall be stipulated in the delivery contract;</p> <p>AT</p>

Commission proposal	Drafting suggestions and Comments
	<p>(Drafting suggestions):</p> <p>(b) to return part of that pulp, pressed, dried or dried and molassed, free of charge to the beet seller, ex-factory. In this case, the part of the pulp to be retained by the sugar undertaking, free of charge, shall be stipulated in the delivery contract;</p> <p><u>(b) to return part of that pulp, pressed, dried or dried and molassed, free of charge to the beet seller, ex-factory;</u></p>
<p>(c) to return all or part of the pulp, pressed or dried, to the beet seller, ex-factory. In this case, the amount of the pulp to be returned to the beet seller and the pressing or drying costs to be paid by the beet seller to the sugar undertaking shall be stipulated in the delivery contract;</p>	<p>NL</p> <p>(Drafting suggestions):</p> <p>(c) to return all or part of the pulp, pressed or dried, to the beet seller, ex-factory. In this case, the amount of the pulp to be returned to the beet seller and the pressing or drying costs to be paid by the beet seller to the sugar undertaking shall be stipulated in the delivery contract;</p> <p>AT</p> <p>(Drafting suggestions):</p> <p>(e) to return all or part of the pulp, pressed or dried, to the beet seller, ex-factory. In this case, the amount of the pulp to be returned to the beet seller and the pressing or drying costs to be paid by the beet seller to the sugar undertaking shall be stipulated in the delivery contract;</p> <p><u>(c) to return the pulp, pressed or dried, to the beet seller, ex-factory; in this case, the sugar undertaking may require the beet seller to pay the pressing or drying costs;</u></p>
<p>(d) to retain all or part of the pulp. In this case, the amount of the pulp to be retained by the sugar undertaking and the price or calculation method for the value of the pulp to be paid by the sugar undertaking to the beet seller shall be stipulated in the delivery contract. The price or calculation method for the value of the pulp shall be based on the possibilities of selling the pulp concerned;’;</p>	<p>NL</p> <p>(Drafting suggestions):</p> <p>(d) to retain all or part of the pulp. In this case, the amount of the pulp to be retained by the sugar undertaking and the price or calculation method for the value of the pulp to be paid by the sugar undertaking to the beet seller shall be stipulated in the delivery contract. The price or calculation method for the value of the pulp shall be based</p>

Commission proposal	Drafting suggestions and Comments								
	<p>on the possibilities of selling the pulp concerned;’;</p> <p>AT (Drafting suggestions):</p> <p>(d) to retain all or part of the pulp. In this case, the amount of the pulp to be retained by the sugar undertaking and the price or calculation method for the value of the pulp to be paid by the sugar undertaking to the beet seller shall be stipulated in the delivery contract. The price or calculation method for the value of the pulp shall be based on the possibilities of selling the pulp concerned;’;</p> <p><u>(d) to pay the beet seller compensation which takes account of the possibilities of selling the pulp concerned.</u></p>								
(d) the following Part is added:									
‘PART II									
Purchase terms for cane									
The purchase terms for beet set out in Part I apply <i>mutatis mutandis</i> to sugar cane.’.									
	<p>LV (Drafting suggestions):</p> <p style="text-align: center;">Annex I PART XXII Apiculture products</p> <p>The apiculture sector shall cover the products listed in the following table:</p> <table border="1" data-bbox="952 1161 1579 1428"> <thead> <tr> <th>CN code</th> <th>Description</th> </tr> </thead> <tbody> <tr> <td>0409 00 00</td> <td>Natural honey</td> </tr> <tr> <td>ex 0410 00 00</td> <td>Royal jelly and propolis, edible</td> </tr> <tr> <td>ex 0511 99 85</td> <td>Royal jelly and propolis, non-edible</td> </tr> </tbody> </table>	CN code	Description	0409 00 00	Natural honey	ex 0410 00 00	Royal jelly and propolis, edible	ex 0511 99 85	Royal jelly and propolis, non-edible
CN code	Description								
0409 00 00	Natural honey								
ex 0410 00 00	Royal jelly and propolis, edible								
ex 0511 99 85	Royal jelly and propolis, non-edible								

Commission proposal	Drafting suggestions and Comments	
	ex 1212 99 95	Pollen and bee bread
	ex 1521 90	Beeswax and bee venom
	<p style="text-align: center;">Annex II <i>PART IX</i> <i>Definitions concerning the apiculture sector</i></p> <p>1. Honey shall be understood as honey within the meaning of Council Directive 2001/110/EC (²³) including as regards to the main types of honey.</p> <p>2. "Apiculture products" means honey, beeswax, royal jelly, propolis, or pollen, bee bread or bee venom.</p> <p>LV (Comments):</p> <p>Latvia proposes to include in the list of apiculture products the “bee bread” and “bee venom” by:</p> <p>1) supplementing respectively the descriptions for products under CN codes ex1212 99 95 and ex1512 90 in the table in Part XXII of Annex I;</p> <p>2) supplementing respectively the list of apiculture products defined in point 2 of Part IX of Annex II.</p> <p><u>Argumentation:</u></p> <p>Latvia believes that supplementing the current list of apiculture products is needed to provide legal clarity and legal grounds for supporting research and investments in production of different apiculture products that help beekeepers strengthen their profitability and contribute to their sustainability.</p> <p>Both proposed products – the bee bread (<i>perga</i>) and the bee venom are primary products of apiculture, produced by bees (animals).</p>	

Commission proposal		Drafting suggestions and Comments
		<p>Production of bee bread (<i>perga</i>) and bee venom helps beekeepers diversify their income by creating a new source of revenue, thus reducing the impact of a prolonged honey market crisis. By producing and selling bee bread and bee venom, beekeepers can reduce their dependence on a single commodity, thus strengthening their financial resilience to market fluctuations and other challenges in the beekeeping industry.</p> <p>Description and characteristics of products:</p> <ul style="list-style-type: none"> • Bee bread (<i>perga</i>) is rich in vitamins (B complex, K), minerals (potassium, calcium, magnesium), essential amino acids, unsaturated fatty acids and antioxidants. Bee bread is a product produced by worker bees from pollen grains, nectar, adding bee saliva, filling everything into a honeycomb, compacting and covering it with a layer of honey, where the mixture undergoes a process of lactic fermentation, which results in lactic acid, which preserves this mass. • Bee venom is the liquid secreted by the workers of several bee species. Apitoxin is the substance that remains after the volatile compounds in the venom evaporate in the air. Bee venom has production potential many innovative applications of bee venom are possible. Bee venom production provides new market opportunities for the beekeeping industry.
ANNEX II		
<i>ANNEX Ia</i>		
LIST OF PRODUCTS REFERRED TO IN ARTICLE 30(1)		
CN code	Description	
ex 0101	Live horses, asses, mules and hinnies:	
	– Horses	
0101 21 00	– – Pure-bred breeding animals*	
0101 29	– – Other:	
0101 29 10	– – – For slaughter	

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0101 29 90	--- Other	
0101 30 00	- Asses	
0101 90 00	- Other	
ex 0103	Live swine:	
0103 10 00	- Pure-bred breeding animals**	
ex 0106	Other live animals:	
0106 14 10	- Domestic rabbits	
ex 0106 19 00	-- Other: reindeer and deer	
0106 33 00	-- Ostriches; emus (<i>Dromaius novaehollandiae</i>)	
0106 39 10	--- Pigeons	
0106 39 80	--- Other birds	
ex 0205 00	Meat of horses, fresh, chilled or frozen	
ex 0208	Other meat and edible meat offal, fresh, chilled or frozen:	
ex 0208 10 10	-- Meat of domestic rabbits	
ex 0208 90 10	-- Meat of domestic pigeons	
ex 0208 90 30	-- Meat of game other than rabbits or hares	
ex 0208 90 60	-- Meat of reindeer	
ex 0407	Birds' eggs, in shell, fresh, preserved or cooked:	
0407 19 90	- Fertilised, other than of poultry	
0407 29 90	- Other fresh eggs, other than of poultry	
0407 90 90	- Other eggs, other than of poultry	
0701	Potatoes, fresh or chilled	
1203 00 00	Copra	
1205 10 90	Low euricic acid rape or colza seeds, whether or not broken, other than for sowing	

Commission proposal		Drafting suggestions and Comments
1205 90 00	Other rape or colza seeds, whether or not broken, other than for sowing	
1206 00 91	Sunflower seeds, shelled; in grey and white striped shell, whether or not broken, other than for sowing	
1206 00 99	Other sunflower seeds, whether or not broken, other than for sowing	
1207 29 00	Cotton seeds, whether or not broken, other than for sowing	
1207 40 90	Sesamum seeds, whether or not broken, other than for sowing	
1207 50 90	Mustard seeds, whether or not broken, other than for sowing	
1207 60 00	– Safflower (<i>Carthamus tinctorius</i>) seeds	
1207 91 90	Poppy seeds, whether or not broken, other than for sowing	
ex 1207 99 96	Other oilseeds and oleaginous fruits, whether or not broken, other than for sowing	
ex 1211	Plants and parts of plants (including seeds and fruits) of a kind used primarily in perfumery, in pharmacy or for insecticidal, fungicidal or similar purposes, fresh or dried, whether or not cut, crushed or powdered excluding the products listed under CN code ex 1211 90 86 in Parts VIII and IX	
1212 94 00	Chicory roots	
ex 1214	Swedes, mangolds, fodder roots, hay, forage kale, and similar forage	

Commission proposal		Drafting suggestions and Comments
	products, whether or not in the form of pellets:	
ex 1214 90	– Other:	
1214 90 10	– – Mangolds, swedes and other fodder roots	
ex 1214 90 90	– – Other, excluding leguminous folder	
ex 2206	Other fermented beverages (for example, cider, perry, mead); mixtures of fermented beverages and mixtures of fermented beverages and non-alcoholic beverages, not elsewhere specified or included:	
ex 2206 00 31 to ex 2206 00 89	– Fermented beverages other than piquette	
5201	Cotton, not carded or combed	
<p>* Entry under this subheading is subject to the conditions laid down in the relevant Union provisions (see Regulation (EU) 2016/1012 of the European Parliament and of the Council of 8 June 2016 on zootechnical and genealogical conditions for the breeding, trade in and entry into the Union of purebred breeding animals, hybrid breeding pigs and the germinal products thereof and amending Regulation (EU) No 652/2014, Council Directives 89/608/EEC and 90/425/EEC and repealing certain acts in the area of animal breeding ('Animal Breeding Regulation') (OJ L 59, 3.3.2015, p. 1, ELI: http://data.europa.eu/eli/reg_impl/2015/262/oj) and Commission Implementing Regulation (EU) 2015/262 of 17 February 2015 laying down rules pursuant to Council Directives 90/427/EEC and 2009/156/EC as regards the methods for the identification of equidae (Equine Passport</p>		

Request for written comments and drafting suggestions - ANNEX
From: SE, SK, RO, PL, NL, LV, LT, HU, GR, ES, EE, CZ, BE, AT

Deadline: *20 January 2026*
Updated: 27/01/2026 16:05

Commission proposal	Drafting suggestions and Comments
Regulation) (OJ L 171, 29.6.2016, p. 66, ELI: http://data.europa.eu/eli/reg/2016/1012/oj).	
**Regulation (EU) 2016/1012.’	

