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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
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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 - Additional comments from Finland



20.1.2026

PUBLIC

Finland's written comments following the meeting of the Working Party on Agricultural Products on 13 and 14 January 2026

Block 1: The EU school scheme, marketing standards for meat and cheese, origin labelling, meat designations and grading methods for pigmeat

- Do you agree with the thresholds proposed by the Commission for free sugars and/or fats (10% and 30% respectively) for the products distributed under the EU school scheme? If not, what thresholds would you propose?

Finland supports the Commission's proposed limits on the content of free sugars and fat from a public health perspective. However, Finland's national dietary recommendations set stricter maximum levels for both fat and free sugars. For example, the maximum fat content for cheese is set at 17%. Finland considers it is important that at national level, Member States should be allowed to lay down national requirements establishing stricter limits for fat and free sugars than those proposed by the Commission.

- Do you agree to keep priority for skimmed or semi-skimmed unsweetened drinking milk?

Finland supports giving priority to skimmed or semi-skimmed unsweetened drinking milk for health reasons, in accordance with Finland's national dietary recommendations.

- Finland considers that the EU School Scheme should remain voluntary for Member States and that the administrative burden should be reduced. The current scheme is administratively disproportionate in Finland, given that free school meals are already provided and that the administrative costs of managing the aid scheme are, in relative terms, high compared with the level of support received. Even a small allocation under the scheme generates administrative burden. The specific circumstances of Member States that already provide free school meals should be taken into account from the perspective of administrative burden.

Postiosoite
Postadress
Postal Address
Maa- ja metsätalousministeriö

Käyntiosoite
Besöksadress
Office

Puhelin
Telefon
Telephone

Faksi
Fax
Fax

s-posti, internet
e-post, internet
e-mail, internet

PL 30
00023 Valtioneuvosto

Hallituskatu 3 A
Helsinki

0295 16001
+358 295 16001

kirjaamo.mmm@gov.fi

Block 2 – Availability of supplies in times of emergencies and severe crises, empowerments for public intervention, securities and tariff quota, adaptation of definitions, import duties, Finnish Aid

- Which elements of the new chapter on the availability of supplies in times of emergencies and severe crises would require further clarification (e.g., governance, alignment with existing Union and national structures, secure exchange of information, avoidance of market disturbances)?

Governance would require further clarification.

- Which targeted adjustments would be most important for your delegation?

Related to the Article 222d(2)(c) Finland sees that the purchase and release of agricultural products shall be carried out in a way that does not distort the market but at the same time for the Member States should leave enough latitude how to implement this in practice. Taking account specialties of our national security stocking system, Finland stresses that (public) tendering procedure is not always possible due to e.g. the confidentiality of reserves, confidential business information required and the nature of the stored product. Therefore, sub paragraph 2c should be amended in a way that it allows the Member State to use also other appropriate manners than (public) tendering procedure when managing the reserves of agricultural products.

Block 3 – Sectoral Interventions and empowerments linked to payments and/or PO recognition

- What would be those elements that would ensure a clear and workable framework for sectoral interventions? Which targeted adjustments would be most important for your delegation, regarding, among others, the mandatory or voluntary nature of interventions, the categories of beneficiaries, and the scope of interventions?

Intervention in apiculture sector should be voluntary for Member States, as the sector is small, for example in Finland, compared to the aid received, the scheme is administratively burdensome. Hop sector interventions should likewise be voluntary for Member States.

In autumn, the Commission presented a calculation method according to which a Member State's minimum national contribution would amount to 30% of the overall public aid for the operational programme (set at 75%), i.e. the 30% would be calculated on the basis of the 75% of public aid. According to the Commission's interpretation, in a situation where the level of public aid would be 50%, the national contribution of 30% would nevertheless still be calculated on the basis of 75% of public aid. Finland considers that the national contribution should always be 30% of the actual level of public aid, and not, in all cases, of 75%. In addition, the calculation method should be set out explicitly in the regulation.

Block 4 – Protein Crops, Hemp, Sugar, POSEI

- With regard to the sector-specific provisions in protein crops, sugar and hemp, can your delegation support targeted adjustments aimed at ensuring clarity, coherence and workable implementation?

Targeted adjustments are needed in particular for hemp.

- If yes, what are the most important targeted adjustments needed according to your delegation?

Based on the working group discussions on the CMO proposal so far, it remains unclear on what scientific evidence a hemp plant with a maximum THC content of 0.3% can be defined as posing a low health risk. Also, according to the 1961 United Nations Single Convention on Narcotic Drugs, the hemp flower is classified as a narcotic substance. Nevertheless, the CMO proposal claims to ensure compliance with international drug control treaties while at the same time adding the hemp flower to the list of approved agricultural products.

The CMO proposal does not specify for what purposes hemp biomass may be freely produced, and therefore the proposal is unclear in relation to national drug and criminal legislation. The proposal concerning the marketing of hemp is intended to clarify the placing of hemp on the EU internal market, but it does not set minimum requirements for market oversight or specify what kind of requirements should at least be imposed on handlers/operators of hemp material to ensure public health protection.

Based on the above considerations, the proposal should include provisions for monitoring the cultivation and marketing of hemp or at least provide Member States with sufficient flexibility in the national implementation of hemp production and marketing so that the Member State's drug and criminal legislation can be taken into account.