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Subject:	Regulation on common market organisation (CMO) of agricultural products - Finnish comments

Delegations will find attached the comments from the Finnish delegation.

The listing of products by agricultural product sectors in Annex I to the Common Market Organisation Regulation should be revised for the next CAP period, especially with regard to products listed under fruit and vegetables (Part IX of Annex I). The present listing of products included in fruit and vegetables has been in use for a long time, and it does not in all respects correspond to the production framework as a whole. Only products listed under the sector concerned can be included in the calculation of the value of the production placed on the market by a producer organisation, which determines the maximum support to be paid. In addition, development measures in the work programme can only be concerned with approved products covered by the organisation of the market.

The conflict in the listing of products is particularly clear in vegetable production: e.g. Jerusalem artichokes (CN code 0714) are listed under cereals in the organisation of the markets even if it is an edible root, which in Finland is grown by vegetable producers. Swede intended for human consumption is not mentioned in edible roots (CN code 0706), even if it is one. Swede is only mentioned in other products under the CN code for fodder roots (CN code 1214). This causes problems in interpretations and uncertainty. A more consistent approach would be that a producer organisations could include the fruit and vegetable production of their producer members in their work programme as comprehensively as possible. At the moment there are certain inconsistencies in the listing of fruit and vegetables under sectors in the organisation of the markets.