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CONTRIBUTION

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 Slovenia on block III

Comments from Slovenia on block 3 (Articles 6, 7, 11 (+Annex II),12 and 13" of the CAP-proposal)

Article 6

- **para 2, 3, 4:** It is necessary to examine whether it makes sense to prescribe targeting to such an extent, thereby limiting the flexibility of Member States and adjustments to the specific characteristics of the structure of agriculture.
- **para 2:** As regards basis for the differentiation of payments, we suggest that also alternative ways are allowed instead of using farmers' income from agricultural activity in a representative reference period;
- **para 4:** More clarity is needed about the meaning of "all holdings under the control of one legal or natural person".
- **para 5:** Taking into account the definition of the beneficiary in the NRPP legal proposal, it is not clear what are implications of this provision, in particular regarding "actively contribute to food security". Does it allow a Member state to exclude farmers who only maintain agricultural areas?
- **para 6:** We disagree with excluding the applicants who reach the retirement age and who receive a retirement pension. Flexibility should be given to a Member State as to decide about this, taking into account situation in a MS.

Article 7

- **para 1:** We suggest that flexibility is given to a Member State as to decide about the implementation of small farmers payment, taking into account situation in a MS;
- **para 2:** Can we differentiate, for example, between three flat-rate payments for small farms, namely for farms in three size categories based on the number of hectares?
- We suggest that simplification of controls is provided, as well.

Article 11

- **para 2:** More clarity is needed what will be required regarding "additional income needs";
- **para 3:** We suggest that guidelines are prepared regarding the potential impact on the internal market;
- **para 4:** The requirement to set a maximum livestock density criteria in nitrate vulnerable zones seems unnecessary given that Member States implement Nitrate Directive.

Article 13

- **para 1:** We suggest amending the provision as to provide more clarity which aspects of resilience can be supported
- more clarity is needed in relation to definition of beneficiaries.