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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 Croatia on block III

Uredba o potpori ZPP

Pisani komentari za *Delegates portal*

Članak	Komentari (na engleskom jeziku, u obliku pitanja)
čl. 6. Degresivna potpora dohotku po površini	<ol style="list-style-type: none">1. In accordance with Article 4, paragraph 3, point c of the NRPF, can farmers be differentiated– as farmers whose main activity is agriculture and those whose main activity is not, and then DABIS be granted to both, with an additional lump sum to those whose principal activity is agriculture?2. The planned average support per hectare for the degressive income support per area must not be less than EUR 130 nor more than EUR 240 for each Member State. Please clarify how the average is observed, as the total amount of support granted to all farmers, by group or some other way. Does this mean that young farmers (as the group Young farmers) can be granted more than EUR 240/ha, and a group, for example, women can be granted less; yet looking at the average amount granted for these two groups, average fits the range EUR 130 to EUR 240.3. Paragraph 4 states that capping applies to related holdings. What is meant by related holdings? Which holdings does this apply to; legal persons, legal and natural persons and family-related or management-related holdings?4. Paragraph 7, point a). If a non-agricultural activity is also carried out on an eligible hectare, how to determine the predominant activity, over time, based on area or something else?
čl. 7. Plaćanje za male poljoprivrednike	<ol style="list-style-type: none">1. Can a small farmer be considered to actively contribute to the security of food supply if his predominant activity is not agriculture?
čl. 11. Proizvodno vezana potpora dohotku	<ol style="list-style-type: none">1. We request the clarification which sectors are eligible for CIS support:<ul style="list-style-type: none">- specific agricultural sectors and products, where relevant defined in accordance with Annex I to Regulation (EU) No 1308/2013, as specified in paragraph 1, subparagraph 1,- the beef and veal, milk and milk products, sheep and goat meat, apiculture products and silkworms sectors, for which support can be granted per animal, as specified in paragraph 1, subparagraph 5, and/or- species listed in Annex II <i>Rules concerning the calculation of animal equivalents for the purpose of Coupled income support referred to in Article 11.</i>, which include pigs, poultry, sheep and goats...2. Please clarify what it means to minimise the potential impact of support decisions on the internal market, and how it is measured/displayed, as stated in paragraph 3.

	<p>3. Paragraph 4 states that for support granted as a payment per animal to the livestock sectors, Member States shall take into account environmental impacts, including by setting a maximum livestock density criteria in nitrate vulnerable zones.</p> <p>We would like to clarify whether the "maximum livestock density criteria" applies exclusively to grazing livestock or also to animals kept in housing system (stables)? In our view, manure produced from animals kept in stables, should not necessarily be considered as a source of pollution within a nitrate vulnerable zone, since such manure can be transported and used in other areas, for instance in regions outside the nitrate vulnerable zones where it is needed as fertilizer.</p>
<p>Prilog II Pravila za izračun ekvivalenata životinje za proizvodno vezanu potporu dohotku iz članka 11.</p>	<p>1. Are the pig and poultry sectors, which species are listed in Annex II, eligible for CIS support?</p>
<p>čl. 12. Potpora za sudjelovanje u instrumentima za upravljanje rizicima</p>	<p>1. Paragraph 1 We request clarification regarding the link between the condition set out in Recital 11 "Appropriate maximum aid rates should be established, with incentives for farmers who implement risk prevention measures, thereby promoting a proactive approach to risk management that strengthens the sector's resilience." and the possible conditions for implementation. Is it to be understood that support may be granted only to those farmers who act proactively by implementing preventive measures? Since no specific eligible measures are set out under this Article, we request confirmation that the measures will fall within the WTO amber box?</p> <p>2. Paragraph 2 We kindly request clarification on the exact meaning of the term "sectoral production risk management tools." Does this term refer to sectoral interventions (for example, interventions implemented by producer organisations in the fruit and vegetables sector), or does it refer to the production sector in general?</p> <p>3. Paragraph 4 We kindly request clarification on whether a maximum aid intensity (in percentage terms) has been established for this measure? Furthermore, we request clarification on how the Member State will ensure the avoidance of any overcompensation that could result from the combination of interventions provided for under this Article with other public or private risk management schemes?</p>
<p>čl. 13. Potpora za ulaganja za</p>	<p>1. Is a Member State allowed, under Article 13, to plan and implement an intervention for the construction of new</p>

poljoprivrednike i
posjednike šuma

public irrigation systems, as was permitted during the 2023–2027 period under Article 74 of Regulation 2021/2115?

2. Could clarification be provided to which rights related to agricultural production are covered by the provision in paragraph 4, point (a)?
3. Can the Commission confirm that it is necessary to add the phrase "or purebred pigs and hybrid pigs" after the words "breeding of cattle, sheep, goats" in point (iv) of point (c), paragraph 4 Article 13?
4. Please clarify whether the exemption from the last paragraph of Article 13, which refers to the derogation for a young farmer, also applies in the case of the establishment of new farmers ("setting-up of new farmers") from Article 14 for those new farmers who do not meet the conditions to be "young farmers"?
5. Please confirm that the purchase of land for all categories of farmers will be allowed through financial instruments without limiting the share of investment intended for the purchase of land i.e. purchase of land may be 100% of the total eligible expenditure for the operation concerned.