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Written comments of Latvian delegation on sectoral interventions under

Proposal for a 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

Latvian delegation is hereby submitting its comments on issues under Block 3, namely, on proposed amendments regarding sectoral interventions, including protein crops sector, and recognition of Producer Organizations. All the comments provided below have already been raised also within our previous written contributions on this proposal.

Regulation	Article	LV comments
1. Protein Crop Sector		
CMO	30 (2)	<p>Latvia does not support the requirement for a mandatory recognition condition in specific sectors. It should be left upon the Member States to assess the national situation and determine which sectors need to be supported. By making the establishment of Producer Organisations (POs) mandatory in certain sectors, Member States would be obliged to elaborate the relevant legislation for PO recognition in those sectors. However, the question arises as to whether such an approach would actually encourage producers to set up POs or also inter-branch organisations (IBOs) in these sectors. We believe that the common support system must be attractive enough to motivate the sector's stakeholders to come together on a voluntary basis, rather than being based on mandatory rules.</p>
2. Sectoral interventions		
CMO	30(3)	<p>Latvia does not object to the mandatory implementation of interventions in the apiculture sector, however, we have question for clarification regarding interventions in the apiculture sector. Currently, Delegated Regulation 2022/126, in particular Article 36, lays down the definition of “beehive”, and Articles 37 and 38 respectively, lay down the method for calculating the number of beehives and the requirements for reporting the number of beehives to the Commission. All those elements are crucial for applying the support for interventions in the apiculture sector. Given that Regulation 2022/126 will no longer be</p>

		applicable in the new period, Latvia would like to ask if the Commission is going to elaborate further secondary acts to lay down the aforementioned elements?
CMO	31	Latvia does not support the over-detailing and detailed classification of types of interventions , such as listing individual training, advice and counselling as separate interventions, as they essentially contribute to the same objective. In total, 17 interventions are mentioned in this framework. Latvia proposes to combine these interventions into larger thematic blocks , with the additional inclusion of key measures such as long-term engagement of mentors and professional managers. Given the different situations and needs of Member States, excessive detail limits the flexibility for Member States to address sector-specific challenges.
CMO	31	Is our understanding correct that all the listed types of interventions are also applicable to apiculture sector? Or is it only point (q) where apiculture is directly mentioned? Latvia would, in particular, ask for the clarification from the Commission on whether the proposed list of types of interventions also entail the currently available investments for “<i>combating beehive invaders and diseases, in particular varroasis</i>” envisaged in Article 55.1(b)(ii) of Regulation 2021/2115? If such type of intervention is not envisaged under the current Article 31 of the CMO proposal, Latvia invites the Commission to supplement the list of types of interventions accordingly.
CMO	32	Question for clarification – the term “ <i>identified producer groups</i> ” in 3 rd subparagraph – the Commission is asked to clarify the application and practical functioning of the term regarding the interventions referred to in Article 31 of Regulation (EU) No 1308/2013.
CMO	33(4)	Latvia requests clarification of the term “individual type of intervention” – how should this term be applied? Are these the same types of interventions stated in Article 31, or should it be understood more generally as interventions in each specific sector mentioned in Article 30(1)? Latvia would like to ask the Commission to provide a practical example of the calculation that illustrates how the funding for a “individual type of intervention” should be interpreted and designed, providing clarity on the distribution and application of funding in the Member States.
CMO	34	Latvia considers that value of marketed production should not be the only criteria for calculation and granting the aid. We believe that the total turnover of the cooperative should be taken into account , since cooperation between producers today is no longer aimed only at the joint marketing of primary production on the market, but rather at overall cooperation and the attainment of stronger positions on the

		<p>market. We believe that maintaining the marketing of products as the only criteria for aid calculation hinders the development of cooperation. Member States should therefore be given more flexibility in the application of the aid criteria. To this regard, Latvia believes that a common approach should be introduced for calculation of aid for associations of producer organisations, producer groups and producer organisations both in the CMO measures and rural development measures. Currently, the rules and approaches for calculating the value of aid are different: the CMO framework provides for a decoupling from the recognised value of marketed productio, while the Rural Development Support System focuses on turnover. This leads to unequal treatment between POs and groups, depending on the instrument through which they receive support. At the same time, this implies an additional administrative burden both for the Member States and for the producer groups themselves, which are forced to adapt to different methodologies.</p>
CMO	Annex I, Part XXII and Annex II, Part IX, point 2	<p>Latvia proposes to add ‘bee bread’ (in Latvian “bišu maize”) and ‘bee venom’ (in Latvian “bišu inde”) to the list of apiculture products. Latvian delegation hereby provides the following explanation and justification for the proposed change:</p> <p>Bee bread is an important and traditional beekeeping product in Latvia. It is rich in vitamins (B complex, K), minerals (potassium, calcium, magnesium), essential amino acids, unsaturated fatty acids and antioxidants. Bee venom has production potential, many innovative applications of bee venom are possible. Bee venom production provides new market opportunities for the beekeeping industry. Production of bee bread 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>
3. General positions (with regard also to the NRPf Regulation proposal)		
		<p>Latvia does not support the envisaged mandatory national financing, as it may distort competition, create a massive burden on national budgets and, further, create inequalities between Member States, considering their different financial possibilities. Similarly, the minimum threshold for national funding set out in the proposal is confusing: does it mean that Member States can co-finance measures to an unlimited extent?</p>

	<p>Latvia invites the European Commission to indicate in which of the articles of the proposed package the possibility to carry over unspent funds for interventions in specific sectors to the next financial year is foreseen. No such clear provision can be found in the current framework, which limits Member States' flexibility and planning possibilities, especially in cases where support measures are not fully implemented within the planned period due to objective circumstances.</p>
	<p>Latvia considers that the conditions for recognition should be revised to ensure uniform and equal criteria for all sectors, adapting those to the criteria applied to the dairy sector. It is important to leave more flexibility to Member States and to avoid discrimination between different sectors. In view of the proposal to include other groups that have not been recognized in the system, Latvia calls for consideration to be given to the possibility of waiving the mandatory recognition requirement, providing instead more flexibility to Member States to take account of their situation and needs.</p>
	<p>Latvia also considers that synchronisation between the Common Market Organisation and Rural Development measures would be necessary, as currently the concepts of producer organisations and producer groups are applied differently, creating confusion of cooperatives. Common market organisations (CMOs) are recognised in specific sectors and their support is based on the value of marketed production, while Rural Development measures determine support from turnover. This dual approach complicates the administrative process and reduces the incentive to merge, as identical cooperatives are assessed differently depending on the instrument chosen. Considering that all policies are to be brought under a unified policy framework, Latvia proposes to harmonise the regulation by using a common concept of 'cooperative' or "producer organisation".</p>
	<p>Latvia is of the opinion that types of intervention in certain sectors, together with territorial and local cooperation initiatives, should aim to promote different models of cooperation, going beyond cooperation between primary producers and supporting also co-operation with the processing stage. Different stakeholders should be able to work together to provide added value, mutually beneficial solutions and innovative solutions throughout the food chain. Cooperation can take place in a variety of areas, from common logistics and resource acquisition to cooperation between processing and primary producers, to short supply chains and territorial initiatives. Primary production is not the only stage where co-operation is possible and needs to be promoted.</p>