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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 - Comments from Romania

Romania written comments of the proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Regulation (EU) No 1308/2013

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Block 3 (sectoral interventions, protein crops, hemp, sugar, POSEI)

Wine Sector

As regards the wine sector, Romania takes note of the new approach proposed by the European Commission, which foresees the inclusion of wine programmes in the Single Plan (PPNR), with an optional nature of the support granted to this sector.

Given the significant difficulties it faces in the current European Union wine market, Romania should not make support for this sector optional. It is essential to maintain a dedicated support mechanism, financed through a distinct package, with a budget allocated to the Member States, similar to the current framework, without imposing a mandatory financial contribution from the States.

Although the Commission proposal invokes the principles of subsidiarity and flexibility granted to the Member States, there is a risk that the application of these principles, in their current form, will lead to a deepening of the difficulties faced by the wine sector.

Romania expresses concern about the introduction of a mandatory contribution of 30% of eligible public expenditure for interventions in the wine sector, as this could lead to discrimination between producers from different countries. We request clarifications regarding the elimination of certain types of interventions: wine tourism, advisory services, actions for the knowledge market, temporary aid for the establishment of mutual funds.

Sugar

Romania has reservations concerning the proposed amendments to Article 125 and Annex X of Regulation (EU) No 1308/2013, which currently allow flexibility in contractual arrangements between sugar producers and beet growers. The proposed changes would make it mandatory for delivery contracts to specify the price or the method of calculating the price for sugar beet pulp, based on the market situation. They would also automatically assign ownership of the pulp to the growers, unless otherwise stated in the contract.

Romania supports maintaining the current system, without modifications, as it allows for flexible, negotiated contracts that have proven effective over the years. Regulatory clarifications should be limited to establishing that ownership rights over the sugar beet pulp should be determined by the delivery contract, rather than being set implicitly by legislation.

Regarding the conditions for the purchase of sugar beet (the amendment of point VIII in Annex X), described in Part II, Section A, point 6 of Annex II, we consider that the sale of sugar beet includes the entire root/body of the beet, and not only its sugar content, as might be interpreted from the current wording of the amendment.

Traditionally, the wet beet pulp was handed over free of charge to the farmer who delivered the sugar beet to the economic operator/sugar factory. In Romania, there is no active market for beet pulp, and in previous years, many farmers did not collect their entitled quantities, generating additional storage costs for the factory.

Partial drying or even pellet production involves costs that must be recovered from the beneficiaries, and these costs have, for many years, been negotiated directly and without issue between farmers and processors, and included in the contract concluded between the farmer and the processing factory.

In cases where farmers do not take the beet pulp resulting from the processing of sugar beet, the operator may charge storage fees or, in extreme cases, may destroy (at the farmer's expense) this valuable organic material, which could otherwise be used.

Protein crops

With regard to protein crops, we consider that supporting them is essential to ensure protein independence at the level of the European Union. Romania has favorable conditions for the cultivation of protein plants, particularly soybeans and alfalfa.

In this context, we consider it appropriate to support the production of protein crops and to include them on the list of sectors in which Member States may, voluntary/ upon request, recognize producer organizations and interbranch organizations, in accordance with Article 159, points (a) and (b) of Regulation (EU) No. 1308/2013.

Block 4 (Empowerments linked to payments and/or PO recognition)

Romania has reservations regarding the application of Article 31 of Regulation (EU) No 1308/2013, which introduces the possibility for Member States to establish and provide support for risk management tools and investments for farmers (as referred to in the CAP Regulation).

Does this mean that Member States will be allowed to decide whether interventions such as investments for farmers may be included in the operational programmes of producer organisations and financed through their operational funds?

If so, Romania considers that this provision should be drafted in a clearer and more transparent manner, in order to explicitly reflect such an interpretation.

Regarding producer groups, Romania would appreciate further details on the criteria they must meet to be eligible beneficiaries of interventions under the Single Plan (e.g., Investments). It is also unclear which types of entities are envisaged — does this include all organisational forms (POs/AOPs/PGs – members or non-members)?