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## **CONTRIBUTION**

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From:	General Secretariat of the Council
To:	Delegations
N° Cion doc.:	ST 11722 2025 ADD 1 + ST 11722 2025 INIT
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 the Netherlands

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### **Protein crops:**

- What is the purpose to add protein crops to art 75 par j), in the list marketing standards?
- In case the purpose is to be able to identify the place of farming or country of origin, does the Commission envisage additional administrative burden for farmers, operators and enforcement agencies to control these measures, in particular when those products are mixed from different origins and marketed in large volumes?

### **Hemp**

- Can the Commission elaborate on how it expects Member States, when enforcing the maximum THC content for hemp, to be able to distinguish between the cultivation of hemp for fiber or for the psychoactive forms of cannabis?
- Does the Commission envisage to set up rules or guidelines regarding the registration of industrial hemp fiber in Member States in order to prevent the production and trade in cannabis products which are not legally produced? Is there an overview of how EU member states register the hemp production at this stage?
- Are Member states still be able to develop their own policies with regard to hemp production for the (either experimental or not) legal cannabis production?

### **Sugar**

Could the Commission clarify the added value for creating separate contractual arrangements for beet pulp, since this could create additional administrative burden for farmers and processors, in particular for cooperatives.

### **Sectoral Interventions**

The Netherlands is positive that the Commission has proposed to continue support through sectoral interventions, and that it has been proposed to be expanded with the protein sector. We are critically assessing the consequences of the new method of financing the interventions by means of the NRPP, in particular regarding fruits and vegetables. In the context of these considerations, the Netherlands has several questions that we wish to address:

#### **Article 30**

1. For interventions in the apiculture sector, no additional provisions have been proposed in the CAP or the CMO proposals. Will the Commission establish these through delegated or implementing acts or will that be the responsibility of the member states?

#### **Article 31**

2. Article 31 lists the types of interventions that member states can establish and provide support for. The Commission has informally indicated that all interventions currently listed in article 47 of Regulation 2021/2115 will be covered in article 31. Yet the Netherlands has noted that several interventions are missing, such as interventions in organic production or harvest and production insurance.
  - a. Can the Commission confirm that all interventions currently listed in article 47 of Regulation 2021/2115 are covered, and can the Commission explain the transfer to article 31 by means of a concordance table?
  - b. If the decision has been made not to include certain interventions in article 31, can the Commission explain the motivations to do so?

#### **Article 32**

3. Can the Commission explain what is meant by article 32, paragraph 1, particularly the term market operators, and what kind of operators is referred to?

#### **Article 33**

4. Can the Commission clarify whether the financing of operational funds consists of a fixed 75% of public support (Union financial assistance + national contribution) and 25% financial contributions of members of producer organisations, or if member states can determine the percentage of public support themselves, with a maximum total of 75% and a minimal national contribution of 30%?
5. Other than a balance between the different types of interventions and the duration of operational programmes, no rules for the implementation and management of operational programmes have been proposed. Can the Commission clarify whether further rules will be laid down in implementing or delegated acts, or if rules regarding the implementation and management of operational programmes are left to the member states?

#### **Article 34**

6. Can the Commission explain what is meant by the phrase “products for which the producer organisation is identified,” in article 34 sub 2 paragraph 1, and how it differs from products for which a producer organisation is “recognised”?

#### **Article 35**

7. In article 35 the Commission is empowered to adopt delegated acts to ensure the proper functioning of sectoral interventions, in particular by avoiding distortion of competition in the internal market and to ensure sustainability.
  - a. Can the Commission expand on what is meant by ensuring the “proper functioning of sectoral interventions” and “sustainability” in this context?
  - b. Does the Commission have any concrete plans for delegated acts at this stage?