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CONTRIBUTION

From: To:	General Secretariat of the Council 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 Estonia

Estonian comments and remarks on Regulation amending Regulation (EU) 1308/2013 as regards the school scheme, sectoral interventions, the protein sector, hemp, marketing standards, import duties, the availability of supplies and Securities.

We thank for the opportunity to provide written feedback on the proposal for an amendment to the regulation. We hereby send our comments and questions regarding the meeting on 19-20 November.

Block 2. Article 7 reference thresholds

Given that cereal's prices are low, while production costs are high, does the Commission also plan to review these thresholds and discuss it with the Member States? Article 7(2) states that *the reference thresholds shall be kept under review by the Commission, taking account of objective criteria, notably developments in production,* ***costs of production (particularly inputs)****, and market trends. When necessary, the reference thresholds shall be updated.* We are therefore interested in what the Commission's plans are regarding Article 7 thresholds.

Block 4.

Protein Crop Sector

We believe that the creation of a separate protein crop sector is positive. It will provide better opportunities to support the sector and help reduce the Union's dependence on imports of high-quality proteins. However, when developing new marketing standards and assessing their necessity, it is important to consider the increased administrative burden on entrepreneurs and on inspection authorities. The aim of including the protein crops sector in the list of marketing standards is to introduce mandatory origin labelling for dried leguminous vegetables and soya bean. The European Commission has pointed out that mandatory origin labelling for protein crops would contribute to the consumption of a greater number of plant-based products and better inform consumers about the origin of the protein crops products they purchase. However, the origin labelling of dried pulses is currently voluntary and is carried out at the initiative of food business operators, which, together with increased general awareness, will already contribute to the consumption of a greater number of plant-based products.

Hemp

The inclusion of hemp provisions is a good step forward, reducing legal uncertainty and unfair competition between farmers in different Member States.

Sectoral intervention

1. Article 31 - will there be technical aid for apiculture intervention?
2. Article 33 (4) - what is meant by a balance between the different types of intervention?
3. Article 34 (1) – do we understand correctly that every Member State indicates in their NRP Plans how they wish to calculate the value of marketed production? If so, this leads to differences between Member States as EU aid is linked to the value of marketed production.
4. Article 34, NRPF article 74(3) - what are the reasons why rules for calculating the aid are different in CMO, where the value of marketed production is taken into account, and in NRPF Regulation which focuses on turnover?
5. Estonia does not support the establishment of a mandatory recognition condition in protein crop sector, and we do not support mandatory recognition also in fruit and vegetable

sector. It is up to the Member State to assess the national situation and determine which sectors need to be supported. We do not support mandatory recognition also because the new proposals foresee co-financing by the Member State and thus a burden on national budgets. It is important to us that the support is designed to be as non-bureaucratic as possible. The support in the fruit and vegetable sector is extremely bureaucratic and complicated for our produces and small producer organisations.

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