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CONTRIBUTION

From: To:	General Secretariat of the Council 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 Croatia

COMMENTS from CROATIA

BLOCK 3

Article 1 (12) (Article 30 Support for interventions in certain sectors)

Regarding provision of Article 30(2) of the Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 Croatia considers it necessary to allow Member State to design and implement sectoral interventions similar to the sectoral interventions referred to in this Section in the form of State aid schemes and to finance them through national funds. This view is supported by the fact that most of the interventions in the Strategic Plan Regulation currently also can be implemented under the Agricultural Block Exemption Regulation (ABER) or the Agricultural Guidelines and financed by national funds, which at present isn't the case for sectoral interventions in sectors listed in Article 30(2).

In Croatia, we face a very low level of interest in implementing sectoral interventions implemented through operational programmes and operational funds. Regardless of the benefits arising from the possibility of using EU funds, producers don't show genuine interest in associating, their business relations are not strong enough and due to the lack of trust they rapidly disperse, and the PO becomes dysfunctional. From the perspective of the beneficiary (PO), the rules for implementing interventions in the fruit and vegetable sector are extremely complex and complicated, which is further contributed by the continuous annual supervision of the Audit body which always results with new additional requirements for the beneficiary.

In view of the above, we propose adding a new paragraph 3 after paragraph 2 stating that, by way of derogation from paragraph 2 of this Article, Member States may adopt national programmes implemented in a similar manner to sectoral interventions in the sectors referred to in Article 1(2), points (d), (f), (g) and (i) of this chapter and financed from national resources.

Article 1 (12) (Article 31 Types of intervention in certain sectors)

Article 12 of the CAP Regulation proposal referred to in Article 31 states that Member States that demonstrate in the NPR Plan the existence of national systems which provide risk coverage for farmers shall be exempted from the obligation to include in their NRP Plan interventions for risk management tools under this Article.

The question is what tools this article exactly refers to? Do these tools relate to crop insurance, mutual funds, restoration of production potential?

Article 1 (12) (Article 34 Value of marketed production)

It is not clear enough from the provisions of this article should the value of marketed production of fruit and vegetables intended for processing which have been transformed into one of the processed fruit and vegetable products listed in Annex I, Part X, to Regulation (EU) No 1308/2013, by either a producer organization, an association of producer organizations or their producer members or subsidiaries, either by themselves or through outsourcing, also be calculated in total value of marketed production as a flat rate in percentage applied to the invoiced value of those processed products.

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To date, that was the case provided for in Article 31(2) of Regulation No 126/2022, previously laid down in Article 22(2) of Regulation 891/2017. Has this provision been omitted, because this section doesn't concern the processed fruit and vegetable products, Part X of Annex I as referred to in Article 30 (1)?

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BLOCK 4

Article 1 Amendments to Regulation (EU) No 1308/2013

The reference to Article 1(2)(d)
In relation to the proposal, we support the inclusion of this sector.

Hemp Article 147b Production of hemp

The reference to Article 1 (19) and (27) refers to hemp
We consider that these provisions of the new Regulation will facilitate the production and marketing of hemp in relation to the submitted proposals on production and marketing which have not been regulated so far. However, in relation to Article 1(19), it remains insufficiently clear which derogations are specifically concerned by the provision of Article 147c (2) of the proposal for a new Regulation. We are also concerned that these provisions will not resolve conflicts regarding the inconsistency of legal acts from different fields of competence, both at EU and national level (e.g. flower peaks).

Article 125, paragraph 1

The reference to Article 1 (17) and Point 5 of Annex I refers to sugar beet
Regarding to the proposal for this provision, we consider it acceptable as the proposal for a new Regulation includes, regarding to Article 125 and amendments to point 8 of Annex X, a clearer wording linked to the conclusion of inter-trade agreements between beet and cane producers and sugar producers.