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**CONTRIBUTION**

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| From:<br>To: | General Secretariat of the Council<br>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<br>- Comments from Hungary |

**Submission by Hungary**
**on the proposed amendments to Regulation (EU) 1308/2013**
**(Ref. No.: WK 10612/2025 INIT)**

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At the outset we would like to thank the Presidency for structuring discussion on the important proposal setting the scene on the new elements of future rules of organisation of common market on agriculture, and for providing an opportunity to submit written comments.. We recall that Hungary has expressed reservations on the draft proposals. However we are actively engage in the process and hereby submitting in writing our concerns and questions. We reserve our right to make comments at further stages of discussion on any further issue.

**Article 31**

Why were certain types of intervention omitted, and why are crisis management and risk prevention tools not distinguished? We would like to mention particularly the tools of consumption promotion and quality policy.

**Article 33.(3) c)**

Is the national contribution part of public expenditure, or is it payable in addition to the 4.1% EU subsidy?

Is the national contribution a mandatory minimum or a fixed amount?

Is it possible to provide additional national funding on top of the mandatory national contribution, as is the case with school programs?

**Article 34.(2) 2. subparagraph**

Could the Commission provide a definition of the term ″ex-organisation, association or producer group″ stage in the regulation and give guidance on the calculation method to be used, given that the fruit and vegetable sector typically interprets commercial processes as delivery to the buyer?

**Article 35**

What is the reason for the significant reduction in delegated powers, and does the Commission see any possibility of expanding them to the following for exemple?

The type of expenditure covered by the interventions included in this Chapter, including, the eligibility of administrative and personnel costs of producer organisations or other beneficiaries when implementing those interventions;

<u>“Marketing standards for meat”</u>

**Annex I. Part I. A (meat and meat products)**

When defining the term “meat” in the draft, did the Commission take into account the definitions already contained in Regulation (EC) No 853/2004 In the case of the term “meat products”, did the Commission examine whether the new term to be introduced is consistent with the products currently manufactured by the meat industry and whether the new rule might have the unintended effect of causing certain traditionally manufactured and sold meat products

to be excluded from their own category as a result. Does the proposal address the issue of future product innovation?

„Sugar"

Regarding the amended Article 125 para 1: The ongoing amendment of the CMO Regulation is providing some additional guarantees for the beet producers in order to improve their bargaining position, like revision clause or indicators of production costs. Could it be reasonable to revise the obligatory provisions on the existence of written agreements within the trade?

"Hemp"

Point 2 of the amended Article 147B offers some flexibility for the Member States to allow the production of hemp products that do not meet the conditions laid down in paragraph 1. Is it also possible that some Member States may adopt stricter rules, i.e. introduce THC limits under 0,3% and prohibit the production of varieties exceeding this limit?

Regarding the amended Article 189 point para 1 letter g: To the marketing of seeds for sowing, strict rules apply in the European Law. Is it necessary and proportionate to lay additional administrative burden on the national administration and the importers to prevent the illicit trade?

Regarding the amended Article 189 para 1 letter h: Is it sufficent to lean on proofs from third countries regarding the THC content of the most risky plant materials, like inflorescences of hemp plants? Would it not be safer to require a chemical analysis for all the batches imported to the EU?

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