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CONTRIBUTION

From: General Secretariat of the Council

To: Delegations

Subject: Regulation establishing the conditions for the implementation of Union support under the CAP
- Comments from Spain on block VI



COMMENTS ON THE PROPOSAL FOR A REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ESTABLISHING THE CONDITIONS FOR IMPLEMENTING UNION AID TO THE COMMON AGRICULTURAL POLICY FOR THE PERIOD 2028–2034. BLOCK VI (28.11.2025)

Art. 22. Measures to solve specific problems

This article is new and will allow you to implement solutions quickly in emergency situations. We understand that it offers the possibility to adopt implementing acts that are necessary and justifiable in these cases, in order to solve specific problems.

In this regard, we would need confirmation as to whether this is a way of empowering the COM to adopt the necessary implementing acts, in order to be able to speed up the response to emergency situations. If it would be so that it could act agilely in anticipation of situations similar to those we have experienced (COVID, Ukraine, Disasters) for which very rapid legislative amendments were necessary. If so, agree with the proposal.

We also believe that it should be defined in advance that it is considered an "emergency case" and an "in case of extraordinary circumstances", so that it is clearer when the Commission should intervene.

Article 24 Committee procedure

In this article we are concerned about the concurrent competences that may exist between the Committee on the Common Agricultural Policy and the Committee established by Article 88 of the Single Fund Regulation.

It is necessary to lay down specific provisions on the competences and areas of each of them, as well as on the coordination mechanisms in case of matters affecting the CAP and regulated in the Fund Regulation.

We also consider it necessary to establish a PAC Expert Group to assist the Committee, similar to what is happening in the current period. It would also be appropriate to establish channels and mechanisms for coordinating this group of experts with others that may be established for other regulations, in the case of matters affecting the CAP.

Article 25 Entry into force and application

The timetable set out in the proposal for drawing up and approving the plans, with a complex procedure involving a multitude of administrations and stakeholders, can complicate the entry into force on 1 January 2028.

This is particularly relevant in the case of regionalised Member States, where decisions and elements of the plan need to be agreed by multiple administrations and bodies.

For this reason, we consider it necessary to lay down provisions in the regulation concerning a possible transition period between the two systems. It would also be necessary to increase



clarity in the regulation on the entry into force and the timeframe of the proposal and its different areas; and to ensure consistency between all its component regulations.

