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CONTRIBUTION

From:	General Secretariat of the Council
To:	Delegations
N° Cion doc.:	9556/18 + REV 1 (en, de, fr) + COR 1
Subject:	Regulation on common market organisation (CMO) of agricultural products - Finnish comments

Delegations will find attached the comments from the Finnish delegation.

Suggestion for amendments to the proposal for Regulation on common market organisation (CMO) of agricultural products, COM (2018) 394 final.

The Finnish delegation would like to submit the following amendment regarding the above-mentioned proposal examined on 4 July in the Council WP on Agricultural Products.

Annex I

The listing of products by agricultural product sectors in Annex I to the Common Market Organisation Regulation for the next CAP period, especially with regard to products listed under fruit and vegetables (Part IX of Annex I) should be revised. At least the following amendments to Annex I should be made.

- Jerusalem artichokes (CN code 0714) should be listed under fruit and vegetables instead of cereals.
- Swede should be listed also under edible roots (CN code 0706) in addition to fodder roots (CN code 1214).

Justification:

The present listing of products included in fruit and vegetables has been in use for a long time, and it does not in all respects correspond to the production framework as a whole. Only products listed under the sector concerned can be included in the calculation of the value of the production placed on the market by a producer organisation, which determines the maximum support to be paid. In addition, development measures in the work programme can only be concerned with approved products covered by the organisation of the market.

At the moment there are certain inconsistencies in the listing of fruit and vegetables under sectors in the organisation of the markets. The conflict in the listing of products is particularly clear in vegetable production: e.g. Jerusalem artichokes (CN code 0714) are listed under cereals in the organisation of the markets even if it is an edible root, which in Finland is grown by vegetable producers. Swede intended for human consumption is not mentioned in edible roots (CN code 0706), even if it is one. Swede is only mentioned in other products under the CN code for fodder roots (CN code 1214). This causes problems in interpretations and uncertainty. A more consistent approach would be that a producer organisations could include the fruit and vegetable production of their producer members in their work programme as comprehensively as possible.

Comments of Finland on the proposal for amendment of Regulation on common market organisation (CMO) of agricultural products 9556/18 concerning wine, following the discussion on the Working party of 12 September 2018.

Point 18), article 119, 4

In Article 119 it is proposed that products that do not comply with the labelling rules should be removed from the market. Finland does not support this amendment. A small failing or incompleteness on the label must not lead to withdrawing of the product from the market. It would cause considerable costs and inefficiency, which is not in proportion to the interest of a consumer to have right information. Withdrawing from the market has to be restricted to cases where there is a danger to the health or life (informing about allergens). A competent authority of member state should be responsible of deciding on withdrawal. It should be possible to complement the text on the label.

Point 32) new categories of grapevine products.

Finland can support this amendment. Products with low alcohol content are on the market and demand is growing. To protect the consumers the definitions should be clear and the alcohol content should be considerably lower than in other wines and clearly mentioned. It can be decisive to a consumer whether the alcohol content is 0,0 % or 0,5 % or 10 %.

Finland can support the idea to add energy content and list of ingredients as compulsory particulars in article 119 of the regulation 1308/2013.