Dear Commissioner,

Copa and Cogeca would like to share with you some of our views regarding the possible topics of discussion for the next trilogue meeting on CMO on 24th March.

In particular, in relation to block 1, Copa and Cogeca would like to remind the following:

- **Article 6 – Marketing years** - We support the inclusion of table olives among the products that have marketing years.
- **Article 11 – Products eligible for public intervention** - We support the extended list of products eligible to public intervention given the increasing market disturbances.
- **Article 13 – Opening and closing of public intervention** - The removal of the automatic triggering of public intervention for common wheat is a step in the wrong direction. Public intervention requires a review of reference price in order to take into account higher production costs.
- **Article 14 – Buying-in at a fixed price or tendering** - We reject the deletion of quantitative limitations for buying-in at fixed price (in line with the statement on art. 15).
- **Article 15 – Public intervention price** - We reject the deletion of the fixed price for buying-in under public intervention. Copa and Cogeca support the fixed price system before activating the tendering system as it gives more certainty to operators in times of crisis. Relying purely on the tendering system might not be beneficial for the overall market evolution. We support the provision according to which when fixing the level of the public intervention price, the Council shall use objective and transparent criteria, which shall be in line with the objective of ensuring a fair standard of living for the agricultural community.
- **Article 16 – General principles on disposal from public intervention** - We support increasing transparency when it comes to the use of public intervention, but this should not go contrary to data protection.
- **Article 17 – Eligible products (private storage)** - We welcome the eligibility of table olives and rice for the aid for private storage. The table olive sector is closely linked to the olive oil sector, which already benefits of the system of aid for private storage as instrument to regulate the supply and acting as safety net. As a result, the private storage measure should be open to table olives. Dehydrated alfalfa should be eligible for the private storage aid mechanism in the event of a crisis in the purchasing capacity of livestock farmers (dairy farmers, for example) and we regret it is not included.

Brussels, 19th March 2021
- **Article 166** a new - Regulation of supply of agricultural products with a protected designation of origin or protected geographical indication other than cheese, wine and ham – we support the amendment of the Parliament to include a voluntary extension (at the request of PO or IPO) of regulation of supply for products with PGIs and PDIs to other products than cheese, wine and ham (therefore similar to existing articles 150, 167, 172). This offers a good tool for GIs to ensure a better economic return.

- **Article 218** a new - EU Observatory of agricultural markets – we fully support the principle of market transparency and information but reject the idea of a single EU observatory, merging all existing ones, because of practical reasons and for the need to consider the specificities of the sectors, rather we would welcome the extension of the EU observatory to other sectors.

- **Article 219** - Measures against market disturbance and for the management of market disturbance – we reject the activation of exceptional market measures before the market management measures as this would diminish the EU COM role in ensuring the public safety nets. The proposed possibility given of adapting the entry scheme for fruit and vegetables through consultation with third countries that export to the Union is a step in the right direction.

- **Articles 218b new, 219a new, 219b new** – when addressing the market disturbance measures, we cannot support the proposed voluntary reduction scheme tied together with the measures to stabilise production in periods of severe market disturbances by imposing a levy on those producers increasing production since it does not take into consideration the differences between sectors, nor it provides an indication on where the financing to cover these interventions would come from. The EC has indeed flexibility, according to the current legal basis, to adopt delegated acts in order to take the necessary measures in case of market disturbance in a particular sector.

In relation to block 3, Copa and Cogeca would reiterate the following:

- **Article 153** – Statutes of producer organisations - this provision should not undermine the stable membership base and supply of cooperatives and POs as this would prevent them from achieving their objectives and nature. It is imperative that if this possibility is made available, it is included in the statutes of producer organisations and democratically approved by its members.

- **Article 157** – Interbranch organisations – we consider that enlarging the list of inter-branch organisations objectives (publication of data on margins) can help with transparency provided it is done for all stages of the supply chain.

Copa and Cogeca would also like to share their views on the following aspects:

- **Article 1 and 125** – Definitions; Sugar sector – we support the definitions of sugar beet and sugar cane in the definitions and section on sugar. These amendments consist in a technical adaptation to consolidate the omnibus revision (notification of sugar beet prices).

- **Article 75** – Establishment and content (marketing standards) – we support the provision on marketing standards and welcome the extension of the list. Hemp should be added to the list of products to which marketing standards may apply. The establishment of specific marketing rules is necessary to ensure the proper functioning of the common market and a consistent protection from fraudulent imports, that can pose serious risk for human and animal health.

- **Article 79 a new** - Mixing olive oil with other vegetable oils – we support the prohibition of mixing olive oil with other vegetable oil in order to keep high standards and preserve the quality of the product.

- **Article 79 b** – Marketing rules concerning the olive sector - it is absolutely necessary to clearly state the marketing rules of olive oil in order to avoid frauds and enhance the consumption of quality products. It is not possible to determine in a
mixture of oils the concrete percentage that corresponds to each one of them. The consumer does not therefore have transparent information, in some cases it can be misleading and contribute to devalue the image of the product.

- **Article 167** new - Marketing rules to improve and stabilize the operation of the common olive oil market – we welcome the introduction of voluntary marketing rules to improve and stabilize the operation of the common olive oil market. Producer Member States should be entitled to lay down supply control measures, in order to avoid surpluses and a fall in prices.

- **Article 189** - Imports of hemp – we welcome the reintroduction of provisions related to hemp imports.

- **Article 188** new – import of agriculture and agri-food products from third countries – We are in favour of this amendment. EU producers cannot compete with imports which do not comply with EU rules.

- **Annex III part B Section 1** - standard quality for sugar beet - if the definition of the standard quality of beet at 16° is deleted from this Annex III, this definition should be include in Annex X, point II paragraph 2

- **Annex X** – Purchase terms of beet - we support that Article 1 of the Commission Delegated Regulation 2016/1166 be included in this basic act in Annex X, point XI, 4a (new)

Copas and Cogeca are at your disposal to further clarify our thinking on these aspects.

Faithfully yours,

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Faithfully yours,

CC : Mr Wolfgang Burtscher, Director-General of DG Agri