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Consultation
on Guidelines on the application of the specific rules set out in Articles 169, 170 and 171 of the CMO Regulation for the olive oil, beef and veal and arable crops sectors (draft)

MTK wants to thank the commission for the draft guidelines. Hopefully the guidelines will lead to all member states allowing producers organisations. In Finland we still only have the so called compulsory producer organisations i.e., only the ones that member states according to the EU legislation have to recognise.

In our opinion there is one crucial thing missing from the guidelines. Point 84 of the guidelines is written as follows:

“In the sectors of beef and veal and of arable crops, the Derogation is applicable provided that the volume of product which is covered by contractual negotiations by a particular PO, and which is produced in any particular Member State, does not exceed 15 % of the total national production of each product referred to respectively in Articles 170(1)(a) and (b) and Articles 171(1)(a)-(l) of the CMO Regulation.”

The 15 % is low but we do realise it cannot be changed by the guidelines as it comes from the CMO.

It would though be extremely important that the guidelines state that the 15 % will be the average of the total national production through a period of at least 3 years or preferable 5 year period. If this is not the case a seriously bad crop one year, could throw the PO out from the safe harbor provided for in the guidelines. This cannot be the wanted scenario.

Yours sincerely,

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