



Position Paper (bloc III) :
Copa-Cogeca's
Position on the
Future Common
Markets Organisation
(CMO) Regulation

23 April 2026





INTRODUCTION

The Common Organisation of the Markets Regulation (CMO) has played a central role in supporting EU agriculture by providing a structured yet flexible framework that recognises the diverse characteristics of agricultural sectors while maintaining the unity of the internal market. It ensured harmonious development for EU agriculture through tailored sectoral measures and particular rules for some sectors addressing various issues while, nevertheless, keeping a certain level of harmonisation for all sectors.

At the same time, the CMO provided the Union with instruments to respond to severe market disturbances (in accordance with Article 39 (c) of the TFEU), such as price volatility, supply shocks, or external crises. This combination ensured both stability and adaptability, allowing policies to reflect sectoral specificities while safeguarding farmers' income and improving their position in the market across the EU. CMO helps the EU agricultural sectors better adapt to market developments and increase their competitiveness.

At a time of high market and geopolitical instability, it is important to preserve and reinforce this essential tool and equip it with the necessary budget and instruments needed to face an even more challenging environment, while ensuring that its ability to adapt to sector-specific needs remains at its core.

For this reason, the EU budget for CMO instruments must at the very least be preserved and adjusted to inflation, and an ambitious level of funding should be maintained for the next programming period; we cannot accept any budget cuts for this policy. A reduction in the budget would jeopardise the very functioning of the sectoral intervention programmes, as well as their undisputed effectiveness.

Operational Programmes, implemented by producer organisations or associations of producer organisations, have demonstrated their ability to contribute to many of the objectives of the CAP and the needs of the agricultural sector: improving competitiveness, adapting supply to demand, rebalancing the chain, introducing R&D and environmentally and climate-sustainable techniques. Consequently, we welcome the fact that the Commission's proposal seeks to maintain and extend the use of this important tool.



GENERAL APPROACH

Copa and Cogeca believe that the market management tools as well as other relevant instruments in the Commission's proposal for the future CMO must continue to be used to strengthen the competitiveness of the European agricultural sector. Consequently, while we welcome several new elements introduced in the Commission's proposal for the future CMO, we believe that this proposal should be further improved.

First and foremost, while maintaining its common nature, it is of the utmost importance that the future CMO preserves, where necessary, the sectoral specificities that have always been at its heart. It would not be advisable to erase these particularities to include all sectors under a one-size-fits-all system that would limit their ability to be resilient and competitive.

Secondly, the EU should aim to provide the EU farming sector with an enabling economic and regulatory environment that can strengthen farmers' market resilience and competitiveness, allowing, in most cases, farmers to remain competitive and adapt to the market. However, at a time when market instability is high and the global scene is changing from one day to the next, in some exceptional cases, these instruments might not be enough, and the use of market interventions remains necessary. It is therefore essential for the CMO to preserve its existing market management instruments and, in the case of crises, have the tools to protect domestic production from global market disturbances, especially for sensitive products and those, in particular, which are most threatened by massive imports from third countries. The Unity Safety Net must be sufficiently funded to ensure the financing of these CMO market and market crisis management provisions.

Furthermore, the CMO should aim to strengthen the bargaining power of producers in the agri-food chain through cooperatives, producer groups, and organisations as in the current programming period; it must be open to innovation and competitiveness, as well as integrated risk management and control systems in agriculture. Operational Programmes have demonstrated their ability to contribute to many of the objectives of the CAP and the needs of

the agricultural sector. While the proposal put forward by the European Commission brings welcome support for the development of certain sectors, some finetuning remains necessary.

Moreover, while the CMO has accommodated sectoral specificities, it has always sought to maintain a level playing field across the EU, thereby preserving the integrity of the single market. Although some level of flexibility is certainly necessary to adapt to Member State particularities, we consider that should there be national co-financing of operational programmes, it should be strictly regulated and harmonised to ensure a level playing field for all EU farmers and agri-cooperatives across Member States.

Finally, the CMO needs to be supported by wide-ranging delegated acts which define the secondary rules uniformly across all Member States.



EU SCHOOL SCHEMES

The EU school schemes were established to instill healthy eating habits in children, raise their awareness about agriculture and promote the dairy and fresh fruit and vegetable sectors.

As this policy has been so far quite successful at providing a significant contribution to these objectives, we welcome its continuation in the future. However, to allow for its full potential to be deployed, we believe that some modifications need to be made to the Commission's proposal:

- With the EU school schemes being an intrinsically agricultural policy that has always been established within the CMO, it is imperative that it remains as such for both coherence and efficiency. We thus call for article 35 §6 and 7 of the National and Regional Partnership Plans Regulation to be moved back to the CMO Regulation.

- The EU school schemes are currently exclusively funded through a dedicated envelope inside the Common Agricultural Policy (CAP) budget. This exclusive EU funding has ensured a fair level playing field between Member

States, safeguarding the integrity of the single market. Consequently, we believe that the Commission's proposal to fund this policy from non-ringfenced NRPP amounts, with a minimum national contribution of 30%, would only create uncertainty regarding the level of funding, potentially impacting the future implementation of these schemes. We call for the establishment of an exclusive ringfenced EU budget inside the Single Fund, separated from the 293.7 billion already ringfenced for agriculture, and fully dedicated to this policy. This budget line would amount to the EU school schemes budget in the current CAP at minimum and be adjusted to inflation (estimation: EUR 1 757 million).

- The Commission's proposal introduces new and very restrictive rules when it comes to nutritional criteria for the products promoted under the school schemes policy. While we certainly welcome nutritional criteria which are essential for guiding children towards healthy eating habits, we do not deem the Commission's proposal of establishing a limit to the exclusion of products with more than 10% free sugar or more than 30% fat to be appropriate. These elements would exclude several products from the schemes that are an integral part of a healthy and balanced diet in many Member States, such as many cheeses and even many fruits such as grapes or cherries. We thus call for these criteria to be removed or, at least, for the possibility of a limited flexibility margin for all Member States to adapt these criteria to their nutritional habits.

- In the same spirit, we call for the removal of budget capping introduced by the Commission's proposal regarding products containing more than 4% fat as even most yoghurts contain more than 4% fat. All dairy products should be allowed, especially yogurt and cheese, provided they contain no added sugars, sweeteners, artificial colours or fats other than those naturally present in milk.

- Regarding the prioritisation criteria introduced by the Commission's proposal for the selection of the products by Member States, some level of flexibility should be introduced. While we generally welcome the criteria, especially the one promoting short supply chains, which must in any case include cooperatives, they should not become a barrier preventing quality agricultural products from reaching schools. We thus call for the inclusion of more criteria that can be taken into account by Member States for the prioritisation of the selection, such as various

agricultural quality schemes. We also underline that the fulfilment of only one of these criteria should be enough for a product to be prioritised, and that these criteria should be used solely for the purpose of prioritisation and, under no circumstances, as exclusion criteria. Finally, it should be specified that all these products should originate from the EU. In addition, as proposed by the Commission, we believe that it is essential for these programmes to be accompanied by educational activities aiming at raising children awareness regarding how these products are produced and about EU agriculture.

- The secondary legislation should also ensure that the administrative burden related to the application, the reporting and the approval processes is reduced.

- The possibility to raise awareness about EU agricultural products other than dairy products and fruits and vegetables through this scheme should be provided based on individual Member State decisions to dedicate extra Single Fund money outside both the ringfenced fund for the school schemes and the amount already ringfenced for agriculture. Among these other products, we call for the inclusion of vegetable oil (such as olive oil, rapeseed oil and linseed oil) and honey, or meat. The inclusion of single portions of vegetable oil in school meals would promote healthier dietary habits among children. For olive oil, it would also reinforce public understanding of extra virgin olive oil nutritional value. Within these programmes, in the case of olive oil, a specific reference to the cultural and environmental value of traditional production should be included, ensuring that such models are not marginalised in consumer awareness.

- It would also be important to underline that plant-based drinks should not have access to a ringfenced budget dedicated to dairy and fruit and vegetable products.



MEASURES TO ADDRESS SEVERE MARKET DISTURBANCES

The EU should provide the EU farming sector with an enabling economic and regulatory environment that can strengthen farmers' market resilience and competitiveness. Such an enabling framework would of course include and be strengthened by CAP tools such as support to farmers for investments or the creation of operational programmes. This should hopefully, in general, allow farmers to adapt to the market and remain competitive. Reinforced by support for risk management measures, such as the funding of hedging costs for farmers and agri-cooperatives. In most cases, such a framework should help prevent the need for market interventions when facing serious market disturbances. However, in some exceptional cases, these instruments might not be enough, and the use of market interventions must remain an available option in the event of severe market disturbances.

The CMO has always provided a set of tools to allow the EU agricultural sector to face these severe market disturbances. At a time when high geopolitical instability is compounding normal and periodical market disturbances, aggravated by the multiplication of climatic events, pests, crops and animal disease outbreaks, it is becoming even more important to maintain and improve the CMO market measures. However, these measures should remain the last resort and be structurally designed in such a way that they sustainably strengthen the resilience of individual farms. In this context, we call for:

- The inclusion of an article in the CMO calling on the Commission to present a proposal to amend Council Regulation 1370/2013 by 31st December 2027 establishing the obligation to revise the threshold and intervention prices every year to ensure they are up to date and take into account inflation. Furthermore, article 11 of the CMO should also be revised to ensure the inclusion of new agricultural products in the list of those for which threshold and intervention prices are established, for example, sugar, industrial hemp, sheep and goat meat, honey, and sheep and goat butter. With regard to private storage, any cheese and curd, not only those covered by a protected designation of origin or a protected geographical indication under Regulation (EU)

No 1151/2012, should be included. In addition, public intervention for butter and skimmed milk powder should be opened throughout the whole year (Art. 12 CMO).

- It is important to underline that public intervention needs to be strictly separated from the strategic stocks. The sole objective of the preparedness plans and the strategic stocks established by Member States should be to ensure the continuity of the food supply chain in times of crisis. These plans and reserves should under no circumstances be used as a tool for market management.

- Current CMO articles relating to private storage (articles 8, 9, 10 and 17 to 21), those relating to exceptional measures (articles 219 to 222), and Safeguard Measures (article 194) should be revised to ensure that:

- The Commission remains empowered - as is established in the current CMO - to activate these measures when it deems it necessary taking into account average market price, price thresholds, and the need to respond to difficult market situations or economic developments. However, it should also be added that if at least two Member States request to assess the potential need for market interventions, the Commission would have the obligation within a limited period of time following the official request to assess the situation and organize a discussion with Member States. Within a limited period of time following that discussion and assessment, the Commission should implement the market interventions deemed necessary.

- Should signs of forthcoming serious market disturbance emerge, taking into account market indicators, including the revised price thresholds, both the Commission and Member States shall have the right to request a discussion between Commission and Member States that must take place within a limited period of time following the official request. Within a limited period of time following that discussion and assessment, the Commission should implement the pre-emptive market interventions deemed necessary.

These changes are necessary as they provide some clarity and predictability regarding the

activation of market measures, while also ensuring their faster implementation. This possibility not only provides more clarity to operators, but also ensures that measures are implemented timely to improve their efficiency and provides a certain level of predictability. Furthermore, the possibility of pre-emptive activation of selected measures could help avoid crises before they develop.

- Additional measures concerning animal diseases should be introduced alongside those already in place, as private storage has proven ineffective due to the costs of storing frozen meat. Complementary measures aimed at producers must be put in place. Private storage merely covers the additional costs incurred by storing the products during this period.

- While private storage may not always be the most appropriate tool in every case, or at least not sufficient alone, it does, nevertheless, remain an important tool in other cases and must continue to be available in future market crises. In general, measures for private storage must be put in place to ensure that the release of these products onto the market does not disrupt the market through oversupply.

- Article 222 of the current CMO concerning the possibility of derogating from Article 101 TFEU should be practical to apply across all agricultural sectors in the event of imminent or existing serious market imbalances, taking into account that the measures taken strengthen and coordinate collective action to rebalance markets, in consultation with producers, cooperatives and their representative organisations in order to avoid unilateral and disorderly actions.

- Considering the very positive contribution that the use of price hedging tools can have in reducing the impact of market volatility on farmers, it would be important to establish the possibility of funding hedging costs for farmers and agri-cooperatives in the CAP under risk management support and a significantly increased budget and to provide them with the necessary financial guarantees to provide improved access to future markets. Costs would be covered by the EU budget while the financial guarantees should be provided by the European Investment Bank. These measures would help manage risk and hopefully reduce the need for market interventions.

- Strengthen the effectiveness of Article 194 on 'Safeguard Measures' against imports by introducing a temporary suspension of tariff rate quotas or preferential tariffs for sensitive products, including under preferential trade agreements, when prices fall below the revised price thresholds.



SECTORAL INTERVENTIONS

Over the years, the CMO has developed a comprehensive set of sectoral interventions that have significantly contributed to the development and resilience of EU agricultural sectors. The success of these measures cannot be attributed solely to the financial support they provide; it also derives from their structuring of agricultural supply chains for the different sectors concerned.

Every agricultural sector faces distinct challenges stemming from product-specific requirements as well as from the climatic, geographical, and socio-economic conditions of the territories in which production takes place. Accordingly, these sectors have developed tailored structures and organisational models adapted to their particular realities. Any support that fails to take these specificities into account is likely to prove ineffective. At the same time, taking into account sectoral specificities should not preclude ensuring a certain level of coherence, harmonisation, and equity in the tools used across sectors. Therefore, COPA and COGECA call for existing sectoral interventions in hop, wine, apiculture, fruit and vegetables, and olive oil to remain as closely aligned as possible with their current provisions so as to preserve stability in these sectors and establish common general rules for other sectors while allowing some level of flexibility to adapt to sectoral specificities.

With this in mind, we call for the following amendments to the Commission's proposal on sectoral interventions:

- Sectoral interventions are intrinsically linked to EU agricultural policy and have historically been embedded within the CMO. For reasons of coherence and clarity within the CMO, it is essential that they revert to falling back within the CMO. We therefore call for Article 35(8)

to (10) of the National and Regional Partnership Plans Regulation to be integrated into the CMO Regulation.

■ The Commission's proposal suggests removing many sectoral specificities by introducing a single, uniform framework for all sectoral interventions, regardless of the sector concerned. Such an approach would undermine the sector-specific design which has been one of the key strengths central to the CMO's effectiveness. We, therefore, call for the proposal to be amended to ensure that the structure of the sectoral intervention for the wine sector remains the same as in the current framework and in line with the "wine package" Regulation. For the apiculture sector, we also call for maintaining the current system of sectorial intervention as structured in the existing CMO. For hops, fruit and vegetables, and olive oil, they should keep the specificities of their current operational programmes. For other sectors, sectoral interventions may also be implemented through operational programmes, taking into account that the general rules governing these programmes (recognition rules for PO and APO as the beneficiaries and actors implementing the programmes, eligibility criteria, the objectives, the VMP definition based on the ex-PO invoiced value and the level of public support and co-financing) remain the same across sectors, but the types of eligible interventions are tailored to the specific production sector as well as other criteria for the management of the aid scheme currently laid down in Commission Delegated Regulation (EU) 2022/126.

■ **Eligible measures for operational programmes:** For all sectors utilising operational programs, the list of eligible measures under producer organisations should at least cover the same elements as those provided for in the current regulatory framework. In addition to these elements, some flexibility should be granted to include other interventions more specific to each sector, but this option must be strictly limited to the intrinsic characteristics of each sector.

■ **Objectives of operational programmes:** The CMO Regulation must clearly establish what the objectives of the operational programmes are for all Member States and all sectors, indicating that any operational programme must, at least, pursue the objective of marketing and concentration of supply, boost value, etc. (as currently established in Regulation 2115/2021).

■ **Obligation for Member States for sectoral interventions:** As regards the obligation for Member States to include operational programmes in their NRPP plans for certain sectors, this requirement should apply to sectors that have traditionally benefited from dedicated measures and budgets, namely fruit and vegetables, hops, and olive oil (with the obligation for olive oil limited to Italy, France, and Greece, and the obligation for hops limited to Germany) and for which recognised producer organisations exist. For the wine and apiculture sectors, Member States should have the obligation to continue the current sectoral interventions without altering the sectorial organisation. In addition, the protein crops sector should be included among the sectors for which Member States are required to establish operational programmes as suggested in the Commission's proposal. However, it is important to underline that it should remain possible for fruit and vegetable producer organisations to implement operational programmes for shelled or unshelled leguminous vegetables as is currently the case.

For sectors other than those listed above, the establishment of operational programmes must remain voluntary for Member States. Nevertheless, this possibility should be open to all sectors, including those not currently benefitting from such programmes (such as raw tobacco), depending on Member States' choices.

■ **Budget for sectoral interventions:** Copageca stresses that the money currently ring-fenced for agriculture is far from sufficient. In general, we call for the CAP budget to at least be maintained at its current level and duly adjusted for inflation. Taking into account that the CAP budget is adjusted correspondingly, we insist that the funding historically committed to sectoral interventions be also maintained at least at the same level, duly adjusted for inflation, and ringfenced, at the same level than the overall CAP budget. Within this funding, and in proportion with the adjustment of the overall CAP budget, dedicated envelopes should be set for each sector where operational programmes are mandatory and for the wine and apiculture sectors. For fruit and vegetables, wine, hops, apiculture, and olive oil, these envelopes should be based on current CMO allocations at least adjusted to inflation in correspondence with the overall CAP budget adjustment (total estimation around a minimum of EUR 22 305 million). For protein crops, a dedicated envelope should also

be established, taking into account that certain products intended for human consumption are already financed by fruit and vegetables producer organisations in the current CMO (see Annex I, Part IX, fresh fruit and vegetables and Part X processed fruit and vegetables). In addition, a separate envelope should be established and dedicated to operational programmes for voluntary sectors.

It is important to underline that the fruit and vegetable sector has so far been financed by an EU budget that was not subdivided into national allocations. This structure made it possible to incentivise producers to work together in producer organisations and associations of producer organisations, regardless of which Member State they were located in. This resulted in many producer organisations operating across borders and led to the creation of trans-national producer organisations and associations of producer organisations. The Commission's proposal to now finance the fruit and vegetable operational programmes from national CAP-allocation is thus highly problematic as it would not allow the sector to operate normally. We thus call for the current system of funding the operational programmes of the fruit and vegetable sector to be preserved, meaning an earmarked EU budget not subdivided in national allocations.

■ **Maximum amount for operational funds:** The Commission's proposal aimed at harmonising the calculation of the maximum amount of operational funds on the basis of 4.1%, 4.5%, and 5% of the Value of Marketed Production (VMP) for all sectors is not appropriate as it would threaten the continuity and stability of sectors currently operating in a different manner. We thus call for the calculation of the current maximum operational funds for the olive oil, hops, and fruit and vegetables sectors to remain sector-specific and consistent with the current EU regulation, based on the assumption that the EU financing of the operational plans will remain the same as in the current period. For other sectors, we call for the calculation of operational funds to be based on a maximum of 6% of their VMP as currently established by article 68 of Regulation (EU) 2021/2115, taking into account that the value of marketed production of the producer organisation itself and its producer members only includes the production of those products for which the producer organisation is recognised and shall be invoiced at the 'ex-producer organisation' stage.

■ **National co-financing of operational programmes:** Regarding national co-financing for operational programmes, there is a risk that insufficient harmonisation could undermine the integrity of the single market and create distortions of competition between Member States. Therefore, should there be national co-financing, there should be the same fixed, mandatory rate for all sectors and Member States.

■ **Level of total public financing for interventions in operational programmes:** the level of total public co-financing for operational programmes for the olive oil, hops, and fruit and vegetable sectors should, at a minimum, remain the same as they currently are in their respective systems and should not exceed 75%, as already set out in the proposal. For other sectors, the level of public EU co-financing for operational programmes should be 50% with the possibility of 60% in some cases as currently defined in article 68 of Regulation (EU) 2021/2115.

■ **Beneficiaries of operational programmes:** Producer organisations and their associations recognised under the CMO Regulation should be the sole beneficiaries of operational programs for the olive oil, and fruit and vegetable sectors. For other sectors, including hop in this case, recognised producer organisations and their associations should remain the usual beneficiaries. However, for these sectors, if they do not have recognised producer organisations, it should be possible to have other beneficiaries for a transitional period of up to 4 years until they become recognised producer organisations, taking into account that they are constituted at the initiative of producers and controlled by them and identified by Member States as producer organisations. If these beneficiaries cannot be recognised by the end of the transitional period, then the aid under the operational programme will have to be repaid.

■ **Transitional provisions:** transitional provisions should be introduced for already approved multi-annual operational programmes extending beyond 2027, ensuring the availability of dedicated funding and allowing them to continue under the rules which existed at the time of their approval until their completion. In the case of the fruit and vegetable sector, this should be financed by an EU budget not sub-divided into national allocations. Transitional provisions should also be introduced for the

sectoral interventions in the wine and honey sectors in case these interventions extend beyond 2027.

■ **Producer organisations covering multiple products:** we call for maintaining the possibility of establishing producer organisations covering multiple agricultural products as long as they meet the recognition conditions established for each of these products. This would facilitate agricultural development in regions where production of a single product is insufficiently concentrated to support a dedicated organisation.

■ Finally, there is a need for secondary legislation that specifies the relevant aspects of operational programme management in a clear and uniform way for all Member States. This would complement the basic regulation and concern for instance: the definition of VMP, eligible actions, maximum withdrawal amounts, etc.



CRISIS PREPAREDNESS

Considering the multiplication of international crises and other events such as the COVID-19 pandemic disturbing supply chains, it is becoming indispensable to establish tools allowing the EU to face similar ones in future. In this context, we strongly welcome the Commission's proposal to introduce the obligation for Member States to establish preparedness plans and share information on national stocks. It is essential that implementation takes place with as little bureaucracy as possible and with the close and collaborative involvement of economic actors such as farmers, cooperatives and others within the agricultural trade. Considering the current global environment and the fragility of the food supply chain, we believe that this initiative should go even further while ensuring that it does not impact the proper functioning of the market. We thus call for:

■ The strategic stocks established by Member States to include all sorts of long-lasting agricultural products, but also stocks of essential inputs necessary for food production, such as fertilisers, PPPs, seeds, energy, packaging, machine parts, emergency generators, CO₂, enhancing ICT system security, developing backup systems or

essential feed additives. However, the exact list of products to be included should remain a Member State decision. To this end, the Commission should conduct a study by 2028 assessing the list of products that would be encouraged to have included in stocks to ensure the proper functioning of the food supply chain in the event of a crisis. This assessment should include an impact assessment of the potential impacts of storage arrangements on access to the included products.

■ The sole objective of the preparedness plans and the stocks established by Member States should be to ensure the continuity of the food supply chain in times of crisis. These plans and reserves should under no circumstances be used as a tool for market management, and the management of these stocks should be conducted in a manner that avoids any market disruption and speculation. To this end, we call for the management of these stocks, whether through their purchase or sale, to be coordinated by the European Commission, but with Member States retaining final decision-making powers. Furthermore, this coordination should be accompanied by a regular exchange of information between Member States organised by the European Commission. With the same objective, we call for purchases and sales for the reserves to be conducted at market prices, but not below threshold prices.

■ To ensure the preservation of the quality of products and a cost-effective implementation, we also believe that reserves should be managed on a rotating basis and primarily by private-sector entities, subject to appropriate compensation by Member States. However, the exact functioning of the system should remain a Member State decision.

■ We call for the Defence, Security, and Space heading of the European Competitiveness Fund (ECF) to fund investments in storage and transport infrastructure for agriculture as well as for energy production and the production and use of circular fertilisers at farm level. For storage and energy production, beneficiaries should be both cooperatives and individual farmers. This private, diversified, and spread storage would allow for a high level of resilience in the event of a crisis. Finally, considering the potential impact on food security of repeated and structural crops and livestock sanitary crises, we call for the European Competitiveness Fund (ECF) to fund investments and research and development programmes to help combat these crises and mitigate their negative consequences.



MARKETING STANDARDS

Marketing standards are a useful tool for operators in order to create a level playing field and ease transactions while ensuring a return based on quality. We thus broadly welcome this tool, however, some sectors already have well-established ones, and creating new standards at EU level for these sectors would only create confusion. Consequently, we call for preserving and, where appropriate, extending existing EU marketing standards and introducing new ones for the following sectors which currently do not benefit from well-defined marketing standards largely recognised by operators:

- Table olives
- Rice
- Protein crops
- Apiculture products other than honey
- Rabbit meat

Marketing standards should not be introduced for other sectors. Furthermore, marketing standards established in the CMO should be designed to accommodate innovation and the particular specificities of Member States.

When Marketing Standards are used with the aim of reinforcing origin labelling requirements, they must ensure that sectors seeking greater transparency on origin have the possibility to cover processed foods or fresh food offered through restaurants and catering.



MEAT-RELATED TERMS

We welcome the Commission's proposal to protect meat-related terms so as to avoid consumers being misled into believing that imitation products provide the same nutritional value as the products they are mimicking. The recently agreed CMO changes on meat denominations represent an important first step in this direction.

However, we consider that the protection should go beyond animal names and cuts to also cover processed meat products and comparable traditional culinary terms. These terms form part of Europe's gastronomic heritage and have been developed through decades of quality work by the livestock and meat sector. Their misuse by non-meat alternatives unfairly capitalises on this heritage to market imitation products.

The list of protected names should remain flexible and adaptable, allowing Member States to update it regularly at national level in order to protect country-specific traditional products. We also encourage the Commission to ensure that linguistic and cultural specificities across EU languages are duly respected when aligning definitions.

Moreover, rabbit meat is currently not covered by the Commission's proposal. We thus call for the inclusion of rabbit meat to be added to the list of protected terms.

In addition, we would like to underline that the strict protection of dairy terms and denominations must remain as it is an essential tool to ensure consumer clarity, legal certainty and market integrity.

Finally, we should extend the protection of dairy terms and meat-related terms to the digital environment in order to ensure consistent enforcement across online platforms, digital marketing and e-commerce channels and to prevent the circumvention of existing rules through digital means.



SECTOR SPECIFIC ELEMENTS

Sectoral papers will complement this position paper by addressing technical details specific to each sector.



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Copa and Cogeca, founded respectively in 1958 and 1959, form the united voice of farmers and agri-cooperatives in the EU.

Copa members represent leading farming unions at national level, speaking for millions of farmers across Europe. Cogeca members represent the interests of the thousands of agricultural cooperatives in Europe.

Our democratic organisations, led by elected representatives, embody the vibrant diversity of European agriculture across all 27 EU Member States.

We are the collective voice of farmers and agricooperatives of all sizes and specialisations dedicated to the daily production of crops, livestock or mixed farming, encompassing both conventional and organic practices. Together, we ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe and contributing to reducing food insecurity globally.