



Opinion of the European Economic and Social Committee

Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) No 1308/2013, (EU) 2021/2115 and (EU) 2021/2116 as regards the strengthening of the position of farmers in the food supply chain

(COM(2024) 577 final – 2024/0319(COD))

(C/2025/2969)

Rapporteur: **Stoyan TCHOUKANOV**

Advisor	Ali KARACOBAN (to the rapporteur)
Legislative procedure	EU Law Tracker
Referral	Council, 17.1.2025 European Parliament, 20.1.2025
Legal basis	Articles 43(2) and 304 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2024) 577 final Summary of COM(2024) 577 final
Relevant Sustainable Development Goals (SDGs)	SDG 2 – Zero Hunger SDG 8 – Decent work and economic growth SDG 12 – Responsible production and consumption
Section responsible	Agriculture, Rural Development and the Environment
Adopted in section	12.3.2025
Adopted at plenary session	27.3.2025
Plenary session No	595
Outcome of vote (for/against/abstentions)	189/3/3

1. RECOMMENDATIONS

The European Economic and Social Committee (EESC):

1.1. supports the European Commission's proposal, which seeks to give producers a stronger position in the agri-food chain, ensure that value is shared fairly between all operators in the chain, and improve the bargaining power of the most vulnerable actors in the food chain; at the same time, the EESC would also recommend additional improvements and insist that these modifications not be called into question under the new common agricultural policy (CAP);

1.2. welcomes the requirement for written contracts for the delivery of agricultural products purchased from farmers, agricultural cooperatives, producer organisations (POs) and associations of producer organisations (APOs), which are to include objective indicators on production costs and information about market prices, and recommends *ex post* monitoring of the effectiveness of the proposed changes based on the collection and evaluation of these data by the European Agri-Food Chain Observatory (AFCO);

1.3. supports the extension of the obligation for written contracts for the delivery of agricultural products purchased from farmers, agricultural cooperatives, POs and APOs, with certain exceptions as defined by the Commission (value thresholds, micro-enterprises), while recommending that the exemption from the value threshold be set at EU level at EUR 5 000;

1.4. recommends that each Member State establish and publish objective and transparent national and/or regional indicators on production costs and information about market prices, in consultation with all stakeholders in the value chain (producers, processors, wholesalers, retailers, food service companies and consumers) and relying on inter-branch organisations as key bodies for developing and publicising these indicators so they can be used in contracts;

1.5. supports the introduction of a mandatory revision clause in written contracts that could be triggered by the producer and would allow a new negotiation about prices paid to farmers in line with changes in production costs and market prices, with due regard to sustainability criteria. This negotiation should conclude within a reasonable timeframe, or be based on adjusted prices calculated based on the objective indicators, or be concluded through the mediation mechanism. During the first six months of the contract, both parts must have legal certainty. The negotiation must be based on objective indicators as established by each Member State and it should be possible to trigger it in the case of both rising and falling prices; proposes that it should be possible to trigger this revision clause in the event of *force majeure* (extreme weather conditions, disease outbreak, geopolitical tensions or severe market imbalances);

1.6. supports the establishment of mediation mechanisms in each Member State – taking into account that such mechanisms may already exist and considering their potential equivalence – no later than the first year following the publication of the regulation, which will be entrusted to mediators appointed by the competent national authorities, to ensure equitable solutions in the event of contractual disputes, but believes that a mechanism ⁽¹⁾ for making decisions within short deadlines must be established;

1.7. supports the Commission's proposal to allow non-recognised producer organisations to benefit from the same exceptions to the competition rules accorded to recognised ones, on the condition that they comply with uniform recognition criteria set at EU level; suggests that this possibility should be a transitional step towards official recognition, with the obligation to obtain recognition within a maximum of two years, in order to ensure a long-term structure in line with EU requirements;

also welcomes the fact that explicit provision is now being made for organic producers to establish and join POs tailored to their specific characteristics, which will enable greater collaboration in this sector;

1.8. recommends increasing from 33 % to 50 % the Commission's ceiling as regards the volume of products that can be covered by the activities of APOs as a percentage of national production; calls for the abolition of this limitation in the current text of the CMO for the dairy sector so that producers can operate on a more structured basis and to strengthen their bargaining power;

1.9. supports the introduction of a statement indicating that direct contact between members of producer organisations and buyers must not undermine the objectives of the organisations, in particular preserving concentration of supply and placing products on the market;

1.10. is in favour of establishing rules for using the terms 'equitable', 'fair' and 'short supply chains' and recommends that the concepts of 'equitable' and 'fair' be clarified, incorporating the remuneration of producers, improving the bargaining power of the most vulnerable actors in the food chain and aligning with the International Fair Trade Charter ⁽²⁾, with due regard to varying regional circumstances; and recommends that an objective and harmonised framework be established at EU level to ensure that these concepts are applied clearly and consistently;

1.11. does not support the changes to national strategic plans, except for the measure concerning incentives for young and new farmers who join a producer organisation, as it believes that these changes risk both disrupting the balances established in the national strategic plans and interfering in the reflection on the next CAP reform;

⁽¹⁾ This mechanism could be based on the rules set out in Directive 2008/52/EC of the European Parliament and of the Council of 21 May 2008 on certain aspects of mediation in civil and commercial matters (OJ L 136, 24.5.2008, p. 3, ELI: <http://data.europa.eu/eli/dir/2008/52/oj>).

⁽²⁾ International Fair Trade Charter: https://www.fair-trade.website/_files/ugd/291e20_3267a575da2549cfa46a2175540b9b95.pdf.

1.12. supports the Commission's proposal to strengthen sustainability objectives in concerted practices between producers by including, in particular, improvement of working and safety conditions in the agricultural sector, in accordance with national law and with at least Convention 184 of the International Labour Organization (ILO);

1.13. recommends revising and updating the reference thresholds for agricultural products purchased from farmers and their economic organisations to bring them in line with current economic circumstances, in particular by taking into account inflation, real production costs (including inputs) and market developments and to establish a review mechanism and annual revision of reference thresholds;

1.14. supports the recommendations to extend contractual obligations to all dairy products bought to farmers, agricultural cooperatives, producer organisations (POs) and associations of producer organisations (APOs), limiting derogations to cooperatives whose statutes provide for similar conditions; also supports the introduction of a mandatory revision clause in written contracts, enabling producers to request a price adjustment in line with changes in production costs and market conditions;

1.15. proposes that ad hoc financial support be mobilised instead of the agricultural reserve to support operators in the event of serious market imbalance and that it should be possible to mobilise this support immediately in the event of a crisis;

1.16. supports the proposal to add a requirement for rules applicable in the event of *force majeure* for the sugar beet sector, and proposes that the revision clause for the sugar beet sector be clarified.

2. EXPLANATORY NOTES

Arguments in support of recommendations 1.1 to 1.6 concerning strengthening the contractual framework

2.1. The EESC supports the proposal to make written contracts compulsory as this gives structure to trade relations and increases transparency and stability in exchanges between producers and buyers. Inspired by French (EGAlim) and Belgian laws, this proposal clarifies contractual responsibilities while supporting transparency and legal certainty, which is essential for producers and all food chain operators to be competitive in the single market and to improve the bargaining power of the most vulnerable actors in the food chain. An *ex post* assessment of the effectiveness of the proposed changes based on the collection and evaluation of the relevant data by the European Agri-Food Chain Observatory (AFCO) is recommended.

2.2. The EESC recommends that the principle of subsidiarity allow Member States to exempt certain specific sectors from the obligation to enter into written contracts, as is the case in the French EGAlim law, to ensure flexibility adapted to local economic circumstances while maintaining the objectives of transparency and fairness (value thresholds, micro-enterprises, donations, on-site deliveries).

2.3. The EESC stresses the need for each Member State to establish and publish objective and transparent indicators that cover the real costs of production, including remuneration of the operator, to make sure that producers' economic circumstances are taken into account fairly, while improving the bargaining power of the most vulnerable actors in the food chain. Inter-branch organisations could be responsible for developing and publishing these indicators, as is the case in France, thus increasing sectors' transparency and fairness.

2.4. The EESC supports the introduction of the revision clause for written contracts to open a new negotiation for the adjusting of fixed prices in line with changes in production costs and market conditions. This negotiation should conclude within a reasonable timeframe, or be based on adjusted prices calculated based on the objective indicators, or be concluded through the mediation mechanism. During the first six months of the contract, both parts must have legal certainty. By using indicators established by each Member State, this measure strengthens producers' economic resilience to price fluctuations, with due regard to sustainability criteria.

2.5. The EESC reiterates its support for establishing mediation mechanisms in each Member State ⁽³⁾ as they provide an effective solution for resolving contractual disputes while strengthening the balance between the parties. Inspired by established practices in some Member States, this measure ensures impartial and rapid intervention to overcome roadblocks, particularly in trade relations between farmers and industry, which are often unbalanced. It thus helps protect producers while reducing tensions in the agri-food value chain.

Argument in support of recommendation 1.7 on non-recognised producer organisations

2.6. The EESC supports this proposal as it offers producers not affiliated with recognised producer organisations the possibility to pool their efforts and enjoy greater bargaining power with downstream actors. However, the EESC recommends that Member States make use of this possibility in a uniform manner and with the ultimate aim of encouraging recognition of producer organisations. The co-existence of recognised and non-recognised POs should be properly managed and time-limited to ensure the transition to a structured model. The EESC therefore recommends that this possibility should be used as a means of encouraging the recognition of POs, with the clear objective of moving towards a more long-term structural basis in line with EU criteria, within a maximum of two years.

Arguments in support of recommendation 1.8 on raising the ceiling from 33 % of national production to 50 %

2.7. The ceiling of 33 % of national production reduces the scope for producers to operate in a more structured manner and weakens their bargaining power vis-à-vis highly concentrated buyers. This has no basis in competition law and does not take into account the specific features of individual Member States and of often transnational markets. Moreover, the existing rules already cover abuse of dominant position. Increasing this ceiling to 50 % or even abolishing it would enable producer organisations to strengthen their position.

Argument in support of recommendation 1.9 on circumvention practices of producer organisations

2.8. The EESC supports creating a framework for direct contact between members of producer organisations and buyers, as this helps prevent circumvention practices by certain manufacturers that seek to undermine producer organisations by favouring individual contracts. By safeguarding the role of producer organisations, this proposal protects producers against increased dependence on manufacturers and ensures effective collective bargaining for the benefit of all members.

Argument in support of recommendation 1.10 on the use of the terms ‘fair’, ‘equitable’ and ‘short supply chains’

2.9. This is a step in the right direction as it promotes transparent and equitable trade relations while promoting local chains. However, the EESC believes that the concept of ‘fair’ or ‘equitable’ price should be based on a price that is profitable for the farmer, calculated on the basis of objective indicators of production costs and of a surplus designed to remunerate the work carried out ⁽⁴⁾ and ensure a fair standard of living for the agri-food community (as provided for in the recently published Vision on Agriculture and Food); the price must be negotiated fairly between the parties, on the basis of a collectively agreed wage applicable to employees in the region concerned and of a profitable price for the other players in the food chain. A common and precise framework is essential to avoid unclear or subjective interpretations that could lead to distortions of competition within the European Union. This common framework could be based on the following elements:

— **alignment with the International Fair Trade Charter**, with due regard to varying regional circumstances ⁽⁵⁾;

⁽³⁾ EESC opinion on ‘Ensuring sustainable food production and a fair income for European farmers in the face of market, environmental and climate challenges’ (not yet published in the Official Journal).

⁽⁴⁾ As already recommended in a previous opinion: Opinion of the European Economic and Social Committee – Fostering sustainable and resilient food systems at times of growing crises (exploratory opinion requested by the Hungarian Presidency of the Council of the EU) (OJ C, C/2025/117, 10.1.2025, ELI: <http://data.europa.eu/eli/C/2025/117/oj>).

⁽⁵⁾ International Fair Trade Charter: https://www.fair-trade.website/_files/ugd/291e20_3267a575da2549cfa46a2175540b9b95.pdf.

- **a price that is profitable for the farmer:** the concept of fairness can only be recognised if the price paid to producers covers not only their production costs, but also their remuneration and ability to invest in the sustainability of their companies. This price must be determined on the basis of objective and transparent indicators of production costs. This concept should also apply to other players in the agri-food chain in the case of processed products (products listed in Article 1(2) of the CMO Regulation);
- **a balanced distribution of value in the food chain:** use of the terms ‘fair’ and ‘equitable’ must involve a transparent and balanced remuneration for all food chain operators, including producers, processors, wholesalers, retailers and food service companies, avoiding unfair trade practices including abuse of dominant position or the failure to deliver a good without a justified reason;
- **transparent and balanced contractual terms:** the use of the terms ‘equitable’ and ‘fair’ must be conditional on clear contracts negotiated in a balanced manner between the parties, ensuring stability and predictability for all the signatories;
- **no unfair trading practices:** a product cannot be deemed ‘fair’ or ‘equitable’ if it is subject to unfair trading practices, such as abusive deferred payments, one-sided clauses or below-cost selling.

Argument in support of recommendation 1.11 on Regulation (EU) 2021/2115 ⁽⁶⁾

2.10. The EESC feels that the proposed measures – except for the one on young or new farmers – risk destabilising the national strategic plans which were drawn up after thorough negotiations and which constitute a framework that has already been stabilised for implementing the current CAP. Furthermore, these proposals may divert the strategic discussions necessary for developing the future CAP, which must respond to the new problems of the agricultural sector in a structured and concerted manner.

2.11. The EESC supports the specific incentive targeting young farmers and new producers joining a recognised producer organisation with the aim of helping them get established and make investments, which are essential for generational renewal and modernisation of the sector.

Argument in support of recommendation 1.12 on broadening the concept of sustainability

2.12. The EESC supports this measure as it combines the economic, environmental and social dimensions of sustainability while placing the protection of farm operators and farm workers at the forefront, in line with the ILO Convention.

Argument in support of recommendation 1.13 on updating the reference thresholds

2.13. The reference thresholds are essential to stabilise agricultural markets and protect farmers against price fluctuations. However, the current thresholds are out of date. For example, the threshold for white sugar has been set at EUR 404,40/tonne since 2009, although it could be readjusted to EUR 585/tonne by 2025 if the current level of inflation within the EU-27 is taken into account. This update would better cover production costs, with a price set at around EUR 38/tonne for sugar beet. Structured and regular updates, e.g. every six months, should be developed at EU level – a role that could be granted to the European Agri-Food Chain Observatory (AFCO).

⁽⁶⁾ Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013 (OJ L 435, 6.12.2021, p. 1, ELI: <http://data.europa.eu/eli/reg/2021/2115/oj>).

Argument in support of recommendation 1.15 on the agricultural reserve

2.14. The EESC proposes that ad hoc financial support be mobilised instead of the agricultural reserve to support operators in the event of serious market imbalance and that it should be possible to mobilise this support immediately in the event of a crisis; it calls on the European Commission to revise the crisis management instruments in the next CAP reform (post-2027) (7).

Argument in support of recommendation 1.16 on the sugar beet sector

2.15. The scope of the revision clause for contracts for the sugar beet sector should be clarified: does it apply to prices, quantities, delivery conditions, etc.?

3. PROPOSED AMENDMENTS TO THE LEGISLATIVE PROPOSAL OF THE EUROPEAN COMMISSION

Amendment 1

linked to recommendation 1.1

Recitals

Add the following recital:

Text proposed by the European Commission	EESC amendment
	<i>The European Commission does not intend to call into question the changes introduced by this regulation in its proposals pertaining to the common agricultural policy for the next period (2028-2034).</i>

Amendment 2

linked to recommendation 1.3

(Article 1(6) of the proposal, amending Article 168(6))

Amend as follows:

Text proposed by the European Commission	EESC amendment
Member States may decide that a written contract or a written offer shall not be required in one or more of the following cases: (a) the delivery concerns products of a value equal to or below a certain threshold of value to be determined by the Member State, and which shall not exceed EUR 10 000 ; (b) the delivery concerns agricultural products that are subject to seasonal supply or demand fluctuations or perishability; (c) the delivery concerns agricultural products that are subject to traditional or customary selling practices.	Member States may decide that a written contract or a written offer shall not be required in one or more of the following cases: (a) the delivery concerns products of a value equal to or below a certain threshold of value to be determined by the Member State, and which shall not exceed EUR 5 000 ; (b) the delivery concerns agricultural products that are subject to seasonal supply or demand fluctuations or perishability; (c) the delivery concerns agricultural products that are subject to traditional or customary selling practices.

(7) EESC opinion on ‘Ensuring sustainable food production and a fair income for European farmers in the face of market, environmental and climate challenges’ (not yet published in the Official Journal).

Amendment 3

linked to recommendation 1.4

(Article 1(6) of the proposal amending Article 168(4)(c)(i))

Amend as follows:

Text proposed by the European Commission	EESC amendment
the price payable for the delivery, which shall:	the price payable for the delivery, which shall:
be static and set out in the contract; or	be static and set out in the contract; or
be calculated by combining various factors set out in the contract, which shall include objective indicators, indices or methods of calculation of the final price, that are easily accessible and comprehensible and that reflect changes in market conditions and production costs, the quantities delivered and the quality or composition of the agricultural products delivered; to that effect, Member States <i>may</i> determine indicators, in accordance with objective criteria <i>based on studies carried out on production and the food supply chain. The parties to the contracts shall be free to refer to these indicators or any other indicators which they deem relevant.</i>	be calculated by combining various factors set out in the contract, which shall include objective indicators, indices or methods of calculation of the final price, that are easily accessible and comprehensible and that reflect changes in market conditions and <i>real</i> production costs, <i>including remuneration of the producer and other vulnerable operators in the food chain</i> , the quantities delivered and the quality or composition of the agricultural products delivered. To that effect, Member States <i>should</i> determine <i>and publish</i> indicators, in accordance with objective criteria, <i>in consultation with all stakeholders.</i>

Reason

This amendment emphasises the importance of objective indicators to ensure that prices cover real production costs, including fair remuneration of operators. It promotes transparency and fairness while entrusting Member States, together with inter-branch organisations, with the responsibility of establishing and publishing these indicators, drawing on existing best practices in France.

Amendment 4

linked to recommendation 1.5

(Article 1(6) of the proposal amending Article 168(4)(c) (iii))

Amend as follows:

Text proposed by the European Commission	EESC amendment
the duration of the contract, which may include either a definite duration or an indefinite duration with a termination clause. In the case of contracts with a minimum duration longer than six months, the contract shall also include a revision clause that <i>may be triggered, in particular, by the farmer, a producer organisation or an association of producer organisations;</i>	the duration of the contract, which may include either a definite duration or an indefinite duration with a termination clause. In the case of contracts with a minimum duration longer than six months, the contract shall also include a <i>mandatory</i> revision clause that <i>allows the opening of a contract negotiation to agree new adjusted prices and conditions in line with changes in production costs and market conditions. This negotiation should conclude within a reasonable timeframe, or be based on adjusted prices calculated based on the objective</i>

Text proposed by the European Commission	EESC amendment
	<i>indicators, or be concluded through the mediation mechanism. During the first six months of the contract, both parts must have legal certainty. The objective indicators shall be developed in consultation with stakeholders in the sector to guarantee transparency and the economic resilience of producers and most vulnerable actors in the food chain against fluctuations, with due regard to sustainability criteria;</i>

Reason

This amendment emphasises the importance of a mandatory revision clause in long-term contracts to reflect the economic circumstances of producers. By using objective indicators established at national level, this measure ensures that prices keep up with changes in production costs and market conditions, while increasing transparency and fairness within agricultural sectors.

Amendment 5

linked to recommendation 1.7

(Article 1(3), point (b), of the proposal, amending Article 152(1a) of Regulation (EU) No 1308/2013 ⁽⁸⁾)

Amend as follows:

Text proposed by the European Commission	EESC amendment
1a. By way of derogation from Article 101(1) TFEU, a producer organisation recognised under paragraph 1 of this Article, or a producer organisation, including a cooperative, that has not been recognised as a producer organisation by a Member State, but meets the requirements set out in paragraph 1 of this Article and of Article 154, may plan production, optimise the production costs, place on the market and negotiate contracts for the supply of agricultural products, on behalf of its members for all or part of their total production.;	1a. By way of derogation from Article 101(1) TFEU, a producer organisation recognised under paragraph 1 of this Article, or a producer organisation, including a cooperative, that has not been recognised as a producer organisation by a Member State, but meets the requirements set out in paragraph 1 of this Article and of Article 154, may plan production, optimise the production costs, place on the market and negotiate contracts for the supply of agricultural products, on behalf of its members for all or part of their total production. However, providing this possibility to non-recognised POs must be a transitional step towards official recognition within a maximum of two years. ;

Reason

This amendment aims to provide a clearer structure for the recognition of **non-recognised producer organisations (POs)** while allowing them to benefit from the same exceptions to the competition rules as recognised POs. However, this openness must not weaken the current structuring of sectors around recognised POs. **Limiting this to a transitional period of two years** would ensure that these POs are fully committed to moving towards official recognition, thus ensuring a **better structuring of agricultural markets**.

⁽⁸⁾ Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007 (OJ L 347, 20.12.2013, p. 671, ELI: <http://data.europa.eu/eli/reg/2013/1308/oj>).

Amendment 6

linked to recommendation 1.8

(Article 1(3), point (c), of the proposal, amending Article 152(1b) of Regulation (EU) No 1308/2013)

Amend as follows:

Text proposed by the European Commission	EESC amendment
By way of derogation from paragraph 1a and the first subparagraph, an association of producer organisations recognised under Article 156(1) may also carry out the activities referred to in paragraph 1a, first subparagraph, provided that: [...] (d) the volume of products covered by the activities referred to in the first subparagraph of paragraph 1a does not exceed 33 % of the total national production of any given Member State.	By way of derogation from paragraph 1a and the first subparagraph, an association of producer organisations recognised under Article 156(1) may also carry out the activities referred to in paragraph 1a, first subparagraph, provided that: [...] (d) the volume of products covered by the activities referred to in the first subparagraph of paragraph 1a does not exceed 50 % of the total national production of any given Member State.

Reason

This limits the ability of POs and APOs to strengthen their position in the value chain and reduces the impact of tools for pooling efforts. It is also not justified in the light of the competition rules and the varying circumstances of the individual Member States and of certain markets, in particular transnational markets. In practice, this deletion also applies to POs and also concerns the current text on the dairy sector, where similar restrictions exist.

Amendment 7

linked to recommendation 1.10

(Article 1(1) of the proposal, amending Article 88a(1)(b))

Amend as follows:

Text proposed by the European Commission	EESC amendment
a price considered equitable by participating farmers for their products,	a price considered equitable by participating farmers for their products, <i>based on a profitable price for the farmer, which includes the remuneration of measures contributing to applying or exceeding the sustainability standards laid down by Union or national law, as defined in paragraph 3 of Article 210a. This price must be calculated on the basis of objective indicators of production costs and include the remuneration of the farmer, ensuring a fair standard of living for the agri-food community (such as foreseen by the recently published Vision on Agriculture and Food); the price must be negotiated in a balanced way between the parties to the contract, and on the basis of a collectively agreed wage applicable to employees in the region concerned, with due regard to varying regional circumstances,</i>

Reason

This amendment specifies that the concept of 'fair' or 'equitable' price must be based on a profitable price for the farmer and the employees, based on objective indicators, with due regard to varying regional circumstances.

Amendment 8

linked to recommendation 1.10

(Article 1(1) of the proposal, amending Article 88a)

Add a new paragraph after paragraph 1.

Text proposed by the European Commission	EESC amendment
	A common and harmonised framework at EU level must be established to regulate the use of the terms ‘fair’ and ‘equitable’, based on clear definitions and objective criteria. This is intended to avoid any unclear or subjective interpretation of those terms which could lead to distortion of competition between Member States.

Reason

This amendment introduces a common and harmonised framework to ensure that terms are used consistently throughout the European Union, thus avoiding distortion of competition and boosting transparency and fairness in trade relations.

Amendment 9

linked to recommendation 1.12

(amending Article 210a(3)(f))

Amend as follows:

Text proposed by the European Commission	EESC amendment
improving working and safety conditions in agricultural or processing activities.	improving working and safety conditions in agricultural or processing activities, in accordance with the standards established by the ILO convention.

Reason

This amendment aims to ensure that the working and safety conditions in the agricultural and agri-food sectors comply with the international standards established by the International Labour Organization (ILO).

Amendment 10

linked to recommendation 1.13

Add a new article after Article 3.

Text proposed by the European Commission	EESC amendment
	Amendment of Regulation 1308/2013, Article 7 on reference thresholds.

Text proposed by the European Commission	EESC amendment
	Paragraph 2 is replaced by the following: 2. The reference thresholds shall be revised regularly (depending on the seasonality of the products) on a proposal from the European Agri-Food Chain Observatory (AFCO) in the light of economic developments and real production costs. The Commission is responsible for developing a methodology for the periodic revision of thresholds, based on objective indicators such as inflation, production costs and agricultural market developments. Production costs shall include the costs of measures contributing to applying or exceeding the sustainability standards laid down by Union or national law, as defined in paragraph 3 of Article 210a. This methodology must enable the thresholds to be updated regularly so that they reflect current economic circumstances and remain an effective tool for stabilising markets.

Reason

The reference thresholds set by Article 7 of the CMO Regulation play a key role in stabilising agricultural markets and protecting farmers against price fluctuations. However, some of them, such as the threshold for white sugar (EUR 404,40/tonne, set in 2009) are out of date and no longer reflect real production costs, which limits how effective they can be.

These challenges could be addressed through an update based on a harmonised methodology and regular adjustment. For example, for sugar, an adjustment in line with inflation and real production costs would bring the threshold to a level consistent with farmers' costs, thus providing more appropriate support.

The EESC recommends that the Commission establish a clear and transparent methodology for regularly reviewing these thresholds. This approach would ensure they are relevant while contributing to better stabilisation of agricultural markets and greater protection of producers in the face of current economic challenges.

Amendment 11

linked to recommendation 1.15

(Article 1(8) of the proposal, amending Article 222(1))

Amend as follows:

Text proposed by the European Commission	EESC amendment
Article 222(1) shall be replaced by the following: Where the Commission adopts implementing acts in accordance with the first subparagraph of this Article, it may decide to make Union support from the agricultural reserve referred to in Article 16 of Regulation (EU) 2021/2116 available to the Member States concerned. Such financial support shall provide the means necessary for the implementation of these agreements and decisions by the operators concerned. [...]	Article 222(1) shall be replaced by the following: Where the Commission adopts implementing acts in accordance with the first subparagraph of this Article, it may decide to make Union support available to the Member States concerned, with the possibility of immediately mobilising this support in the event of a crisis. Such financial support shall provide the means necessary for the implementation of these agreements and decisions by the operators concerned. [...]

Reason

See 2.13.

The aim of this amendment is to separate the funding of market stabilisation measures from this reserve, by providing for ad hoc financial support that is better suited to cyclical fluctuations and economic crises and that can be mobilised quickly when crises arise. This would ensure a more targeted emergency response and avoid depleting resources that are essential for other agricultural emergencies.

Amendment 12

linked to recommendation 1.16

(Article 1(9) amending Annex X)

Add a new point after point (e).

Text proposed by the European Commission	EESC amendment
	(f) <i>A new point XII is added to Annex X: The duration of the delivery contracts may be pluriannual. In the case of contracts with a minimum duration longer than six months, the contract shall include a revision clause that may be triggered by the farmer, a producer organisation or an association of producer organisations. It is possible to trigger the revision clause in the event of force majeure (extreme weather conditions, disease outbreak, geopolitical tensions or severe market imbalances).</i>

Reason

See 2.14.

Introducing a revision clause into multi-annual contracts for the sugar beet sector, to be triggered in the event of *force majeure*, would mean that the contractual terms could be adapted in response to unforeseeable events such as droughts, disease or geopolitical crises. This measure would give greater economic security to producers while preserving balanced trade relations in the sugar industry.

Brussels, 27 March 2025.

The President
of the European Economic and Social Committee
Oliver RÖPKE