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Public Consultation on the review of the European Union farm and food products promotion policy

The Assembly of European Horticultural Regions (AREFLH) main missions are:

- to represent its 16 member regions and 35 POs (Producer organisations) and AOPs, from 10 European countries;
- to defend the economic and social interests of the fruit, vegetable, and horticultural sectors in Europe;
- to foster exchanges of best practices, partnerships and joint projects between regions and professional organisations;
- to actively seek new solutions for the main issues affecting the future of the fruit and vegetables production in Europe.

AREFLH POSITIONS

The promotion policy is an essential tool for raising awareness of the quality and variety of production that the EU agriculture sector offers. It has an excellent record in finding new markets for EU agricultural produce and has demonstrated the clear added value of EU standards in the sector. After a difficult year, the EU's economic recovery cannot be complete without its renowned produce reaching the greatest number of consumers, both within the single market and third countries. We welcome that the future policy will continue to focus on fruit and vegetables as a product category to promote both within the EU and in third markets. Considering the structure and contents of the policy, we welcome the public consultation as part of its revision process. At AREFLH, we wish to propose the following priorities for the policy's revision:

Consolidate current successes

The European Union's agricultural and quality standards are the most stringent in the world, and as such the promotion policy must make this clear. For fruit and vegetable producers, investing in sustainable practices has long been the economic choice: thanks to the strong structure offered by the Common Market Organisation for fruit and vegetables and its operational programmes, the sector has been able to take the lead in investments to increase its sustainability, and the promotion policy should communicate on this proactive approach, to complement the existing communication on specific quality schemes.

To this end, restoring the budget to 2020 levels will be essential. After the difficulties encountered due to the pandemic and its resulting economic disruption, the resumption of economic activity at pre-pandemic levels will require strong support to ensure the visibility and competitiveness of EU products.

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Greater clarity and more realistic objectives concerning sustainable practices

While we welcome a shift of the promotion policy towards greater visibility for sustainably produced agri-food products, what constitutes such sustainable production is not clear, and needs to be better defined to make clear what steps must be incorporated and accounted for in the production process, and what products can benefit from the policy. On this note, the transition towards more organic production is a laudable goal that AREFLH supports, but its promotion must not lead to the overshadowing of other sustainable practices. For example, integrated production incorporates sustainable practices, and the European Commission already monitors its implementation. Furthermore, with an EU average of 8.5% of agricultural land currently under organic production, we believe that a more gradual approach to the promotion of organic products would be more beneficial. The heavy emphasis on promoting organic products now risks creating a dependence on imports. A more gradual approach, in which the promotion of organic products increases in line with the ability to find new market outlets to sustain demand over the long term, and consequently allows production to transition accordingly, would deliver more concrete long-term results in line with policy objectives. To this end, extending the promotion policy's eligibility to farmers in the process of transitioning to organic production would demonstrate that this conversion can bring concrete rewards in the immediate term, and can persuade other producers to make the change.

That said, we oppose an exclusive emphasis on quality schemes, as it creates the impression that only certain products falling under these schemes can benefit from promotion policy spending, fails to communicate on the overall quality standards of EU products, and does not encourage a greater adoption of sustainable practices throughout the European agri-food sector.

Ensure a balance between internal and external promotion

In terms of promotion, the emphasis on a healthy diet must be carefully thought out to avoid inadvertently penalising certain sectors. On the question of promoting the same agri-food products inside and outside the EU, this could give an involuntary advantage to imported agri-food products over the same products originating from within the EU. If certain products currently being promoted are suddenly excluded, they do not benefit from visibility that can inform European consumers, and third country products whose quality standards are not necessarily aligned to those of EU products can benefit from ongoing demand for these products. Conversely, certain products with little demand within the EU market have considerable demand outside it, and therefore should not be excluded from promotion policy support. Additionally, certain fruits and vegetables with a low production outside Europe should not penalise those with a large production within it, and vice versa.

We welcome the focus on fruit and vegetables in both internal market promotion and third country markets, but also believe that the policy's focus should be adapted to each. Inside the single market, the promotion policy should emphasise European production as key to a sustainable food supply thanks to high quality standards and strong environmental commitments applied to farming. In third country markets, the products' competitiveness should be priorities, with quality standards key to securing market share in view of increased competition from third countries with increasingly well-financed promotion programmes (the United States currently commits 200€ million per year to promote its agri-food products).

Coherence with on eligibility criteria, objectives and other legislation

Considering the key role that the Green Deal and the Farm to Fork strategy will have on all EU policymaking for the foreseeable future, the promotion policy's eligibility criteria must accurately reflect the Deal and the Strategy's objectives and be applied in a uniform manner, taking into consideration the range of priorities and policy objectives that they aim to address.

AREFLH

MIN-110 quai de paludate - BP26 - 33800 BORDEAUX

Tel : +33.5.33.89.10.19

www.areflh.org – eupolicies@areflh.org

Regarding Europe's Beating Cancer Plan, this is a specific health issue, and while important, defining eligibility criteria strictly in relation to one health issue risks creating a promotion policy that focuses heavily on the issue but does not reflect the wider priorities of the policies mentioned above. However, the move to restrict promotion policy support only to products aligned to healthy and sustainable diets seems unfair: if a product does not meet the required standards, it should not be available on the market, independent of promotional considerations, and this would need to apply to third-country products being imported into the single market. In this case, a focus on a balanced diet would make the most sense, acknowledging that the variety and high standards of products originating from within the EU is what makes this possible and accessible.

We strongly agree that all products currently eligible to receive the promotion policy's support remain so, but it should also be extended to other categories of agri-food products, which can also help promote a healthy plant-based diet (such as potatoes, canned fruit and vegetables and frozen fruit and vegetables). However, for this to be successful, there should be a clear focus on products directly originating from agri-food production, so that the full range of such products is known, and consumers can understand that healthy options take many different forms and satisfy different budget considerations at the consumer level.

It is also important to remember that the promotion policy's fulfils objectives

strictly related to market performance (market share, access to third markets, etc.). Adding these additional requirements and objectives risks distorting the policy's original purpose, and its effectiveness in the future promotion of EU agri-food products in the face of increasingly visible and well-supported competition.