

**To: Commissioner Kyriakides
Commissioner Wojciechowski
Commissioner Sinkevičius**

Brussels, 12th May 2023

RE: Need for an increased dialogue with united EU food chain to ensure a robust and enforceable Framework Legislation on Sustainable Food Systems – Request for a follow-up meeting

Dear Commissioners,

The European agri-food chain is characterised by its strong interlinkages amongst all partners in the chain, its complexity, its resilience in a continued period of uncertainties, and its common goal to continue striving for a high level of food safety, food quality and nutrition security. We support the Farm to Fork Strategy core objective to make our food systems more sustainable and welcome the Commission's ambition to establish a new EU framework legislation to facilitate the transition towards sustainable food systems.

The European agri-food chain is eager to play a constructive and proactive role in driving the transition towards more sustainable food systems. With this purpose, we wish to step up the public-private cooperation between the Commission and the agri-food chain to ensure the creation of an efficient, robust, and successful Framework for Sustainable Food Systems (FSFS). Sustainable food systems can only be achieved through a supportive policy, which is truly holistic, coordinated, harmonised, co-built, inclusive and science-based. Against this background, we believe that further consideration should be given to the below elements in the development of the FSFS:

- **Definition of sustainability:** To ensure policy coherence and consistency with world-staged ambitions, it is of the utmost importance that the FSFS establishes a clear definition of sustainability and that its implementation takes the three elements of sustainability into consideration in a balanced manner, and aligns with international definitions. Any definition, principle and future legislation should be based on clear, robust, and up-to-date scientific evidence and data.
- **Scope of the legislation:** The definition of the scope of the regulation will have a crucial impact on EU food production, supply, manufacturing, trade, distribution, and consumption. Currently, the scope of this initiative remains extremely vague. To effectively assess its impact and prepare for its implementation, we call on the Commission to reflect together with food chain actors on a precise scope tailored to agri-food chain ground realities and in accordance with existing sectorial legislation. In addition, the FSFS should provide legal certainty, clarity, and a level playing field for the entire food value chain, ensuring harmonisation at EU level and future-proof legislation.

- **Policy coherence and an interdisciplinary approach:** The new framework would need to ensure coherence with all relevant EU legislation, across areas of impact to our sector and involve the relevant Commission's Directorate-Generals (DGs) and their expertise (DG GROW, TRADE, CLIMA, JUST). Such an interdisciplinary approach will help ensure a truly long-term change and avoid incoherence or duplication with already existing legislation.
- **Elaboration and implementation of the FSFS:** The further elaboration process of the FSFS should be based on a multi-stakeholder cooperation, involving agri-food chain actors, and ensure a high level of EU harmonisation to avoid any fragmentation of the Single Market. In addition, more clarity is needed on the management and implementation of this policy within the Commission, once the FSFS is adopted.
- **Interlinkage of food security and sustainable food systems:** Any sustainable food system should also ensure food security (including food availability, affordability, and accessibility) and nutrition security.
- **Trade and international dimension of sustainability:** Sustainable food systems would need to consider the interconnectedness of EU and global agri-food chains and, as such, take the international dimension of trade for food and nutrition security and circularity into account.
- **Realistic cost review and support for necessary transitions:** Further assessment would be necessary to analyse the potential costs of the envisaged measures under the FSFS. The FSFS should act as an enabling regulatory framework, and thus entail the necessary incentives, financial, and technological support to enable food chain actors to contribute to the transition towards more sustainable food systems.
- **Recognition of the diversity of the agri-food realities in their contribution to sustainability:** The FSFS should allow for all food chain actors to focus on key areas for their sustainability improvement in ways that are suited to their realities, taking into account the diversity of processes and products.

Given its complexity and the importance the FSFS will have for the entire agri-food chain, we believe it is crucial to work together on this file in a more collaborative and transparent manner.

We would be grateful for your availability for a meeting, at your best convenience, to discuss the above-mentioned points.

We thank you for your time and consideration and we look forward to hearing from you.

Yours Sincerely,

On behalf of the following organisations:

AREPO – Association of European Regions for Products of Origin

A.R.E.F.L.H - Assembly of European Horticultural Regions

Animal Health Europe - representing manufacturers of animal medicines, vaccines and other animal health products in Europe

AVEC - Association of Poultry Processors and Poultry Trade in the EU countries

CELCAA – the voice of European traders in agri-food commodities

CEEV - Comité Européen des Entreprises Vins

CEVI – European Confederation of Independent Winegrowers

CEJA - European council of young farmers

CropLife Europe - representing the crop protection industry

COCERAL - European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agrosupply

Copa-Cogeca - the united voice of farmers and their cooperatives in the European Union

EFFA - European Flavour Association

EFFAB – European Forum of Farm Animals Breeders

EFOW – European Federation of Origin Wines

ELO – European Landowners’ Organization

Eurocommerce - the voice of Retail and Wholesale in Europe

Euro Coop - European Community of Consumer Co-operatives

EU Specialty Food Ingredients – Federation of European Specialty Food Ingredients Industries

Europatat - European Potato Trade Association

Euroseeds – the voice of the European seed sector

FEFAC - The European Compound Feed Manufacturers' Federation

Fertilizers Europe - represents the interests of the majority of mineral fertilizer manufacturers in the European Union

FoodDrinkEurope - represents the European food and drink industry, the largest manufacturing sector in the EU in terms of turnover and employment

FoodService Europe - represents the interests of the European contract catering sector at EU level

GME – Gelatine Manufacturers of Europe

Hotrec – the umbrella Association of Hotels, Restaurants, Pubs and Cafes and similar establishments in Europe

IBC - the federation of national associations of small and medium-sized craft butcher and catering companies

Independent Retail Europe - the European association for groups of independent retailers in the food and non-food sectors

PFP – Primary Food Processors

Serving Europe – Branded Food and Beverage Service Chains Associations

UECBV – European Livestock and Meat Trades Union



Cc:

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