



EUROPEAN FEDERATION OF THE TRADE
IN DRIED FRUIT & EDIBLE NUTS • PROCESSED FRUIT & VEGETABLES
PROCESSED FISHERY PRODUCTS • SPICES • HONEY



FRUCOM WORKING GROUP: DRIED FRUIT AND NUTS

28 June 2021

AGENDA

- Regulation on increased controls and emergency measures
- Organics
- SO2: ECHA's Risk Assessment Committee proposed re-classification
- Nutrition
- Code of Conduct for Responsible Business and Marketing Practices

REGULATION ON INCREASED CONTROLS AND EMERGENCY MEASURES



Regulation 2019/1793

Amendments from May 2021 (regulation 2021/608):

Annex 1:

- Goji berries from China – pesticides – delisted
- Dried vine fruit from Turkey – OTA – delisted

Annex 2:

- Hazelnuts from Turkey – AFLA - Move to Annex I with the same frequency of 5 %
- Peanuts from Brazil – AFLA - Move to Annex I with the same frequency of 10%
- Peanuts from China – AFLA - Move to Annex I under a revised frequency of 10%.
- Peanuts from India – AFLA - Increase the frequency from 10% to 50%.

Both Annexes: the CN code for roasted Sesamum seeds added

From April 2021: New model official certificate for Annex II.

Pending amendment

- The US pistachios (currently at 10%) will be delisted
- The testing for US peanuts to be increased from current 10% to 20%

Disclaimer: the draft text is not yet available

- The text was presented to the Standing Committee 17-18 June
- Vote by a written procedure (usually for a few days). COM expected to start it around 24 June, after the feedback of the Commission Legal Service on the text
- COM to keep FRUCOM informed regarding the date of entry into force, currently estimated to be around early August



ORGANICS



Organics

State of play of the New Organic Regulation (EU) 2018/848 and its secondary legislation:

<https://frucom.eu/circulars/2715:short-report-on-the-meeting-on-%C2%ABorganic-farming-%C2%BB-held-on-19-may-2021.html>

EU COMMISSION OPENS COMMENTS ON TWO DRAFT REGULATIONS ON ORGANIC IMPORTS

1. **Draft delegated regulation** - rules on the official controls in respect of consignments of organic products and in-conversion products intended for import into the Union and on the certificate of inspection.
 2. **Draft implementing regulation** - rules on documents and notifications required for organic and in conversion products intended for import into the Union. Also lists the EU countries' obligations to notify non-compliance found during official controls at the entry into the EU
- **Feedback Period: 14 June 2021 - 12 July 2021**

<https://frucom.eu/circulars/2767:comments-open-on-two-draft-regulations-on-organics.html>

Organics

- REGULATION ON ORGANICS: INFORMATION TO BE SENT BY THIRD COUNTRIES/CONTROLS BODIES FOR RECOGNITION
- Adopted by the Commission on 27.05.2021.
- The Commission Delegated Regulation with rules on the information to be sent by third countries and by control authorities and control bodies for the purpose of supervision of their recognition under Article 33(2) and (3) of Council Regulation (EC) No 834/2007 for imported organic products
- <https://frucom.eu/circulars/2723:commission-adoption-of-regulations-on-organic-food-and-official-laboratories.html>

Organics

- WTO NOTIFICATIONS: MODEL CERTIFICATE FOR OPERATORS IN THIRD COUNTRIES AUTHORISED FOR ORGANIC PRODUCTION AND CONTROL AUTHORITIES
- The EU Commission has notified WTO about the draft Commission Implementing Regulation laying down certain rules concerning the certificate issued to operators, groups of operators and exporters in third countries involved in the imports of organic products into the Union and establishing the list of recognised control authorities and control bodies in accordance with Regulation (EU) 2018/848.

<https://frucom.eu/circulars/2722:wto-notifications-model-certificate-for-operators-in-third-countries-authorised-for-organic-production-and-control-authorities.html>

Brexit and trade in organics: meeting 19 May 2021

- The only UK certification body currently accepted by the EU is the Soil Association.

Comments by EU Commission:

- In 2020, given the risk the parties could not agree on the EU-UK agreement, and organic products from UK are considered non-EU, the Commission recognised 6 UK control bodies indicated by the UK, regulation 2020/2196.
- However, the EU-UK TCA entered into force in May 2021. Annex 14: the EU has recognised equivalence with the UK. This applies to unprocessed agricultural/aquaculture products produced in the UK, or processed in the UK from the local or imported ingredients. Extract from Annex 14 EU-UK agreement: *“The organic products listed in this Appendix shall be unprocessed agricultural or aquaculture products produced in the United Kingdom or processed agricultural products for use as food or feed that have been processed in the United Kingdom with ingredients that have been grown in the United Kingdom or that have been imported into the United Kingdom in accordance with United Kingdom laws and regulations.”*

Brexit and trade in organics: meeting 19 May 2021

- Certification bodies notified by the UK will be recognised by the EU.
- In reply to FRUCOM's question, the official explained that draft legislation will be prepared in the next weeks, the Commission hopes to vote in July COP (Committee on Organic Products). **Update 28 June: according to the Commission, this is being slightly delayed, the UK bodies have received a letter from the Commission.**
- Answering the question about the product scope (concretely about the products imported into the UK, unprocessed in the UK), the Commission specified they are not in the scope of the agreement, but the scope is already very large if compared to agreements with other third countries.
- A participant commented that the EU organic producers are still facing the prospect of having to submit hard copy certificates with organic products exported from EU to the UK from 1st October, and the EU organic producers will be impacted by this.

SO2: ECHA's Risk Assessment Committee proposed re-classification



SO₂

- FRUCOM has been contacted by a consultant on behalf of the Lead Registrant (LR) for SO₂, the Sulphuric Acid REACH Consortium (SAC), supported by the European Sulphuric Acid Association (ESA) and Sulfur Dioxide based Chemicals REACH Consortium (SDIOC).
- Following the submission by Germany of a harmonized classification and labeling (CLH) dossier, an additional classification of germ-cell mutagenicity cat. 2, as well as skin sensitization, is proposed.
- This consortium considers this proposed classification not scientifically warranted.
- In their view, a possible adoption of a decision can be expected already in September 2021 at the Risk Assessment Committee (RAC) of ECHA – the European Chemicals Agency.

SO2

- Such potential re-classification of SO2 would have consequences:
- **Food preservation is an important function of SO2 and of sulfites as derivatives.** They are approved for food use (E221, E223, E224). Key uses include the preservation of dried fruits (e.g., apricots) as well as protection of food against melanosis.
- There is a natural endogenous sulfite background and presence in many food items and those produced by fermentation
- No alternatives in many food uses exist. **Alternatives are significantly more costly and not an improvement.**
- Even if there is no imminent formal impact, there will be a significant impact driven by a change in the public perception of a possibly labeled 'CMR – carcinogenic, mutagenic, toxic for reproduction' substance.
- The consultant **enquires about the possibility of sending a support letter to the national authorities.**
- Short letter and contacts received in Spain, Italy, Germany, France, the Netherlands; if agree, national associations could send letters to national contacts ASAP

NUTRITION

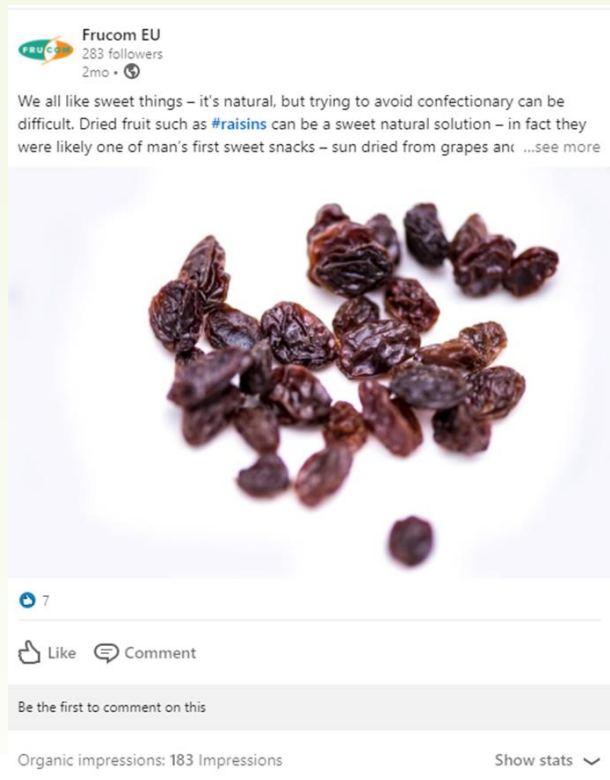


Frucom activities

- Nutrition information for members & articles for FRUCOM webpage
- Frucom EU LinkedIn page launched on 15 December 2020
- Since then it has gained an audience of 283 organic followers
- Our experts recommend a mix of food products to be shown on LinkedIn to illustrate the variety of work Frucom is involved in, as well as give the audience a wider range of information.
- FRUCOM General Assembly discussed inclusion of processed fruit, vegetables and seafood, but not forgetting dried fruit and nuts.
- **Please send your comments/suggestions before 5th July**

Please follow:

<https://www.linkedin.com/company/frucom-eu/?viewAsMember=true>



18 MAY 2021

REALLY EASY FIGGY CAKE, A SWEET INDULGENCE THAT'S ALSO GOOD FOR YOU!

Each 107g portion is high in fibre, vitamin E, phosphorus and manganese; and also a source of vitamin D, vitamin K, vitamin B12, biotin, copper and selenium. For the full nutritional content for this recipe, see attached:

[Figgy cake extract](#) Really Easy Figgy CakeIngredients for 8...

[Read more](#)

15 FEBRUARY 2021

A RECIPE HIGHLIGHTING FRUCOM PRODUCTS' HEALTH BENEFITS: HAZELNUT RAISIN TOPPER RECIPE

his recipe, developed by Jennette Higgs from FoodtoFit, illustrates the combined nutrition and health benefits of hazelnuts and raisins. Combining raisins with hazelnuts adds a complementary sweetness. This Hazelnut Raisin Topper is a natural, easy to make nutritional supplement that can be positioned as a useful, nutrient boost to many diets/meals/snacks. Being a simple and short recipe with no cooking,...

[Read more](#)



8 MARCH 2021

NUTS AND DRIED FRUIT - WHICH IS THEIR POTENTIAL TO CONTRIBUTE TO NORMAL IMMUNE FUNCTION?

Which is the role of nuts and dried fruit in terms of their potential to contribute to normal immune function? Here is a short article, written for Frucom members by the nutritionist Jennette Higgs, around the topic of immunity and diet. It provides some accurate and helpful nutrition and health information in the context of nuts and dried fruit and explains how to avoid misleading or overstating...

[Read more](#)

1 FEBRUARY 2021

BAKING EUROPE PUBLICATION ON THE BENEFITS OF DRIED FRUIT, NUTS AND PEANUTS

...

[Read more](#)

Nuts, dried fruit, fibre, antioxidants and EU nutrition and health claims regulations

4 JUNE 2021

There are two important nutritional attributes common to nuts and dried fruit that have a great deal in common when it comes to the EU nutrition and health claims regulations (NHCRi). Surprising as it may seem, they are no other than fibre and antioxidants! Both are limited by what we can say about them, despite being significant aspects of nutritional health and wellbeing. The reason for this limitation is that neither word carries an authorised health claim under EU NHCR legislation. So, let's talk about each in turn to understand the issues better: [fibre antioxidant article 280521](#)

Frucom EU
283 followers
2mo • 🌱

Like all nuts, **#hazelnuts** are packed with good nutrition, energy dense - being high in fat and yet we can say they're good for heart health! Some might think this is a contradiction but the good news is that hazelnut's energy comes from healthy fats. ...see more




8 • 1 comment

Like Comment

Organic impressions: 661 Impressions Show stats ▾

2mo • 🌱

#Figs are high in potassium, and a source of calcium and magnesium, which contribute to normal muscle function. They are also a source of copper and manganese, two nutrients that support normal connective tissue function. ...see more



Including dried fruit, such as figs as part of a varied and balanced diet and a healthy lifestyle makes more sense than you might think!

7 • 1 comment

Thank you for... Do you think... I'll keep this in mind... I thi >

Like Comment

Frucom EU Add a comment... 🌱

Organic impressions: 271 Impressions Show stats ▾

Code of Conduct for Responsible Business and Marketing Practices



Code of Conduct

FRUCOM publication: <https://frucom.eu/circulars/2772:european-commission-presents-the-code-of-conduct-on-responsible-food-business-and-marketing-practices-to-stakeholders.html>

EU overview/text: https://ec.europa.eu/food/horizontal-topics/farm-fork-strategy/sustainable-food-processing-wholesale-retail-hospitality-and-0_en

Aspirational objectives:

1. Healthy, balanced and sustainable diets for all European consumers, contributing to:
Reversing malnutrition and diet-related noncommunicable diseases in the EU
Reducing the environmental footprint of food consumption by 2030
2. Prevention and reduction of food loss and waste
(at consumer level, within internal operations, and across value chains)
3. A climate neutral food chain in Europe by 2050
4. An optimised circular and resource-efficient food chain in Europe
5. Sustained, inclusive and sustainable economic growth, employment and decent work for all
6. Sustainable value creation in the European food supply chain through partnership
7. Sustainable sourcing in food supply chains

Code of Conduct: Pros and cons

Cons: annual reporting, no clarity regarding responsibility for hosting the website, collection of documents, reports, commitments, the annual evaluation of progress and commitments, methodology, use of information.

The benefits of signing the CoC now (rather than waiting until later) would be:

- 1. First mover advantage
- 2. Setting the benchmark on commitments in your industry / sector
- 3. Being (perceived as) a team player
- 4. Avoid / delay regulation
- 5. Reputational (avoid potential risk of name and shame)

5 July: the big EU launch event



Thank you!

