



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

Brussels, 4th April 2024

To: Professor Peter Strohschneider  
Chair of the Strategic Dialogue on the Future of EU Agriculture

Dear Professor Strohschneider,

FRUCOM represents over 230 EU importing companies of dried fruit, nuts, peanuts, processed fruit and vegetables and processed seafood. FRUCOM also has affiliate members in main supply countries which often represent the supply chain of farmers, processors and exporters.

We thank you for your letter and provide below FRUCOM's answers to three of your questions.

In short:

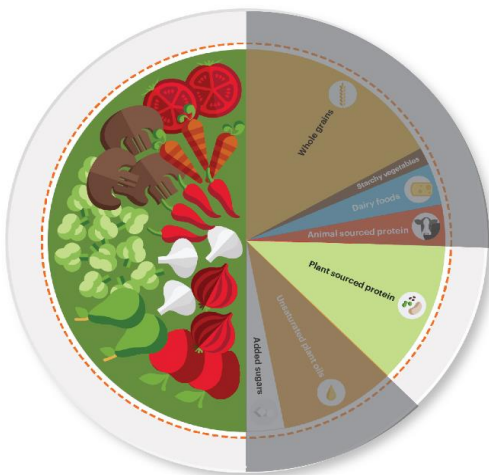
FRUCOM products contribute to sustainable nutrition within planetary boundaries.

The EU farming and EU food system are linked to trade. FRUCOM favors less and higher quality legislation, which is focused on the needs and prioritises food sector's value added, is proportionate and harmonised. Our companies need free access to their target markets, as well as secure global sourcing. To achieve this, compliance with and implementation of all requirements must be actively supported.

• **How can agriculture be supported within the boundaries of our planet and its ecosystem?**

**The products represented in FRUCOM contribute to sustainable nutrition within planetary boundaries and should be prioritized in the EU policies:**

The fact that dietary patterns which prioritise plant-based foods reducing animal-based ones can help to shift towards more healthy and sustainable diets is nowadays widely supported by scientific evidence. The 'planetary health diet' is an example, basing on whole grains, fruits, vegetables, nuts and legumes.



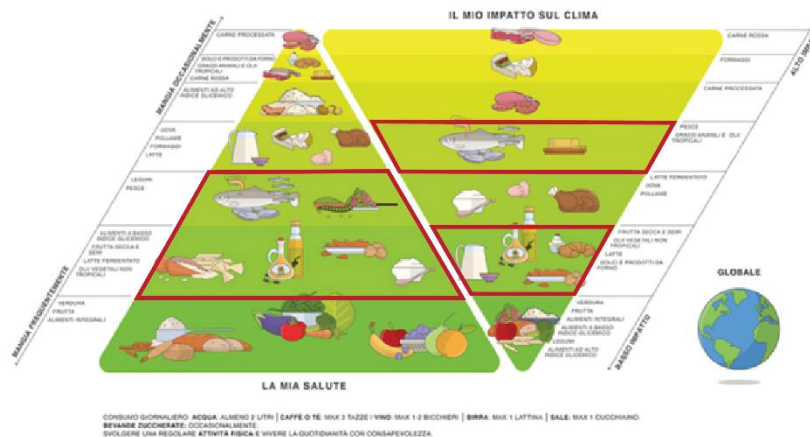
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Source : <https://eatforum.org/eat-lancet-commission/the-planetary-health-diet-and-you/>

The pyramid for health and planet shows that the foods that are beneficial for our health tend to overlap with those which are also beneficial for our planet.



Source: <https://www.fondazionebarilla.com/en/double-pyramid/>

In this context, FRUCOM products are very well positioned.

- **NUTS:** nuts are very well-known mostly for their unsaturated fat content. They are also healthy and sustainable sources of dietary protein among other foods such as legumes and seeds. Plant-based protein from nuts has a lower carbon footprint than animal-based proteins (Kg Co2eq/100 grams protein). They are also source of micronutrients which are usually associated with other foods, namely calcium and iron among others. The portion size is small due to the high nutritional density. If stored in the proper conditions, nuts have a long shelf life and are easily portionable, avoiding food waste.
- **DRIED FRUIT AND PROCESSED FRUIT AND VEG (CANNED/FROZEN):** high in nutrients with a long shelf life, easy to transport and store, they provide valuable micronutrients and fibres and can assure food security through all-year round availability. They also help reducing food waste both at grower and consumer level. They are often packed in handy portion sizes, ready-peeled and prepared, allowing the reduction of food waste at household level if compared to fresh products.

- **How can farmers, and the rural communities they live in, be given a better perspective, including a fair standard of living?**
- **How can a bright and thriving future for Europe's food system be promoted in a competitive world?**
  - Most FRUCOM importing companies and affiliate members in source countries representing the supply chain of farmers, processors and exporters are SMEs. They have limited resources but make a significant contribution to both EU and 3<sup>rd</sup> countries' economies and communities, also in rural areas. Trade also contributes to development objectives in some cases.
  - **Imports are complementary to and necessary for EU production and farming.** Examples are yoghurts with EU milk and imported processed fruit and seeds; imported raisins in breakfast cereals manufactured with EU grain etc. Imports are also complementary in that for many crops the EU

production is limited (e.g. raisins, almonds) or inexistent (peanuts, cashew nuts).

Supplies from various countries, including from the EU farming, help balance market needs, especially in case of crop shortages. Technology transfer and investments also take place alongside trade.

- Importers are usually also exporters, and often also packers/manufacturers. **Securing free trade should be seen as the most important strategic objective.**
- Since the import trade is linked to farmers/processors/exporters in EU and in 3<sup>rd</sup> countries, there should be a **chain approach in legislation**. 3<sup>rd</sup> countries genuinely want to comply with EU legislation, but there should be more consultation, proportionality and time to adjust.
- **Less and better legislation:** There has been an avalanche of sustainability legislation in the last years, e.g. Corporate Sustainability Reporting Directive (CSRD); Carbon Border Adjustment Mechanism; Directive on Empowering the consumer for the green transition; EU Deforestation Regulation; Substantiating environmental claims; Corporate Sustainability Due Diligence Directive; Packaging and Packaging Waste Regulation; Regulation on prohibiting products made with forced labour on the Union market. Even if in some cases SMEs are excluded from the scope (e.g. CSRD), in practice they will have to comply and provide information because their large buyers will demand it.
- **Grow business value added, not bureaucracy:** Is ever increasing bureaucracy of compliance and reporting really the value add for competitiveness of businesses whose objective is to manufacture or import food products? Has the proportionality assessment or global impact assessment of sustainability policy been carried out? Controls, suppliers' audits etc are in place by the trade. Sustainability efforts and achievements should be recognised before any new initiatives are proposed.

#### Proportionality:

- Our members support transparency for consumers, but there is a trade off between degree of detail and the cost for which the consumer is ready to pay.
- Whilst the EU has a legitimate right to pass legislation concerning food products that are placed on its market, measures which are disproportionate non-tariff barriers to access the EU market may also lead to retaliation by third countries against EU food and agricultural imports, and in turn hurt EU producers further.
- The EU absolutely must do more to be transparent with stakeholders on how data and information relating to production and products from third countries can be used to support and **enable** agri-food trade, as much as the EU intends for data to be an enabler of more efficient production in the EU. An increasing amount of information is being requested from importers, SMEs and third country producers which will certainly generate the very same degree of administrative burden which has instigated widespread protests and complaints from producers in the EU, and it would seem counterintuitive for this data to only be used to increase friction in trading of agricultural goods.
- There must be the **targeted support to implementation** of the many regulations, laws and guidelines with the appropriate "tools" in the EU and in 3<sup>rd</sup> countries. There are many companies

that want to fulfil all specific requirements, but do not have the tools to do so. It is necessary to have checklists, examples of hazard analyses and data sources provided at the same time as legislation.

- **Focus on the needs:** We recognise improved transparency of the EU pesticide policy. However, the approach is piecemeal regulation rather than starting from EU (and 3<sup>rd</sup> country) operators' needs and solutions. We stress the need for transition time for long shelf life products in case of any legislation change.
- The EU should strive for **market harmonisation** rather than fragmented national implementation (e.g. due diligence, mineral oils - MOAH, official controls in imports).

Thank you for your attention,

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Anna Boulova", with a long horizontal stroke extending to the right.

Anna Boulova

FRUCOM Secretary General

