

FRUCOM Manifesto

2024 2029



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

Who we are

FRUCOM represents and defends the interests of traders in **dried fruit, edible nuts, peanuts, processed seafood and processed fruit & vegetables** in the EU. We also work with the UK and the main origin countries (e.g. US, Türkiye, Australia, Chile, among others).

FRUCOM seeks to facilitate the **trade** of **safe** and **high-quality** products in the EU and ensure that its members are fully informed of the legal requirements. Based in Brussels, it is a platform promoting fruitful interactions between its members, while representing them to the European institutions.

FRUCOM contributes to the **visibility** of the sector and to a favourable trading environment in the EU. FRUCOM engages with the **European institutions** on relevant topics through official channels, defending the priorities and interests of its members.



Our role

- Fostering **cooperation** between its members on common issues, strengthening the sector as a whole.
- Creating **positive synergies** among its members – the support to healthy food has positive repercussions in other areas, such as reduced costs to health systems.
- Connecting the sector and the **EU institutions**.
- Delivering **industry expertise** to EU discussions and positively influencing EU legislation through official channels.
- Supporting **access for third countries** to the EU market.
- Sharing information with EU institutions on third countries' and stakeholders' production **practices** and **systems**.

Commitments

- Full compliance with the European legislation, namely on food safety and sustainability.
- Provision of high-quality products meeting the demands of the consumers.
- Where relevant, sharing voluntary commitments and good practices (e.g. pre-export checks on almonds, pistachios and peanuts).
- Where relevant, compliance with third party standards (such as the BRC, Rainforest Alliance, ECO Cert, Fair Labour Association, the Business Social Compliance Initiative, etc.).



Imports

The EU largely depends on imports for FRUCOM products

Imported food products are a fundamental part of the EU citizens' diet, filling in the gaps where EU production cannot satisfy the demands of consumers.

Nuts such as **cashews**, **pecans**, **macadamias**, **Brazil nuts** and **peanuts** are not produced in the EU and are entirely imported from third countries.

ALMONDS

250.000 t

IMPORTED FROM THE US IN 2023

US produces over 80% of the world's almonds.

Australia is the world's second largest producer, with 6%, closely followed by Spain, with a similar production level.



WALNUTS

27%

SHARE OF WORLD PRODUCTION FROM THE US IN 2023

US is only surpassed by China, and is the largest EU supplier.



HAZELNUTS

65%

SHARE OF WORLD PRODUCTION FROM TÜRKIYE IN 2023

Türkiye is the largest producer of hazelnuts in the world. Italy is the second largest producer with 7%.



PISTACHIOS

80.000 t

IMPORTED FROM THE US IN 2023

The US, Iran and Türkiye represent 97% of the world's production of pistachios. The EU producers, combined, amount to less than 1%.



Imports

RAISINS

22%

SHARE OF WORLD PRODUCTION FROM TÜRKIYE IN 2023

The largest EU producer is Greece with 1.5%



DATES

60.000 t

IMPORTED FROM TUNISIA IN 2023

Dates are not produced in the EU, and Tunisia is the largest supplier.



PINEAPPLES

88%

SHARE IMPORTED FROM COSTA RICA IN 2023

Costa Rica is the main source of pineapples supplied to the EU, accounting for 685.000 tonnes in 2023.



SEAFOOD

67%

SHARE IMPORTED BY THE EU

The EU supply estimation is 3.2 million tonnes and import is 8.9 million tonnes.



SHRIMPS, TUNA, SARDINES

IMPORT DEPENDENCY

99%



22% shrimps imported from Ecuador

94%



24% tuna imported from Ecuador

91%



Sardines imported from Morocco

Sources:

Access2Market (2023, EU27).

EU Seafood market: AIPCE – CEP FinFish study.

INC Global Statistical Review, NUTFRUIT Magazine (November 2023).

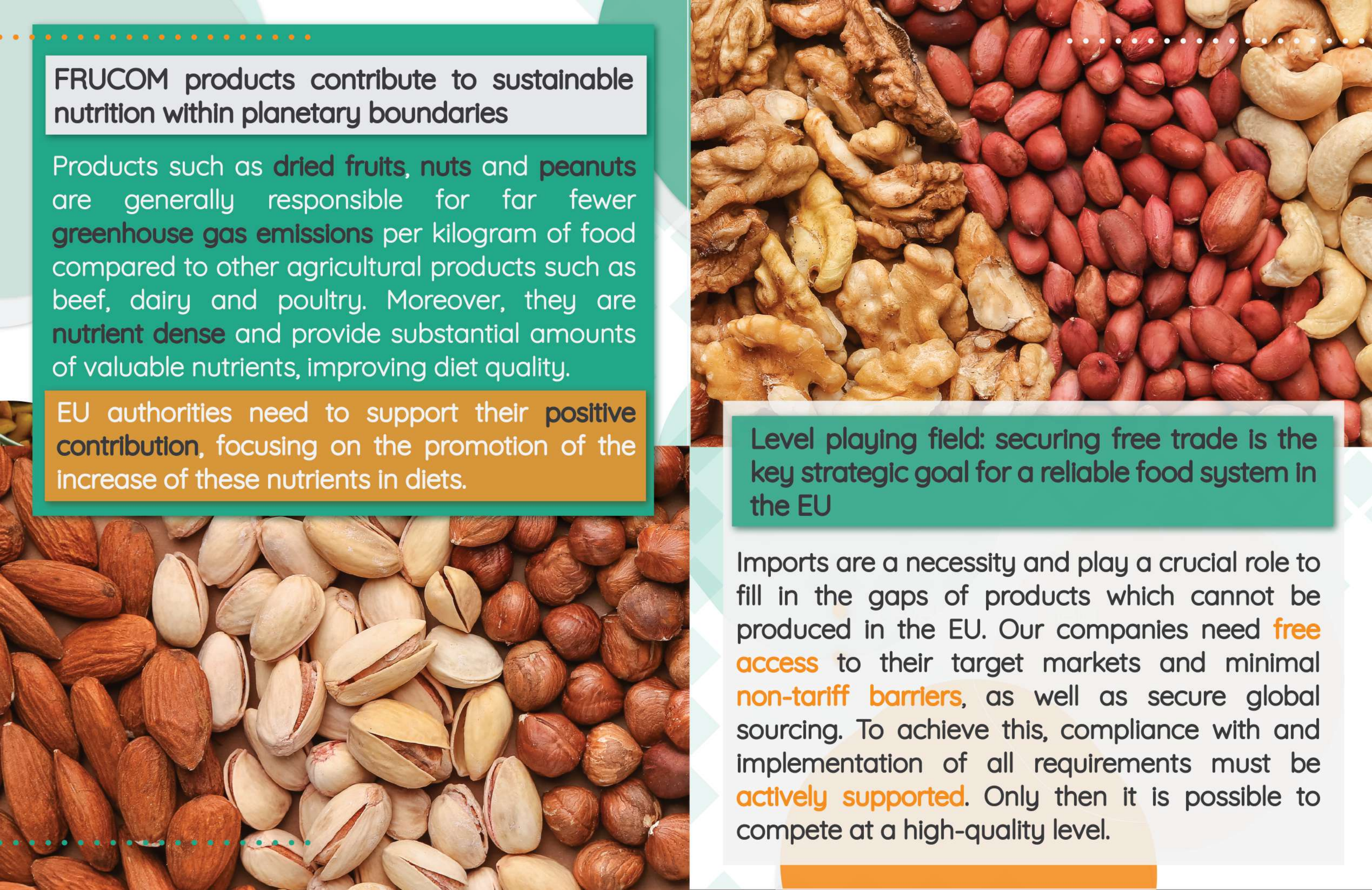
A photograph of various dried fruits and nuts in wooden bowls on a white wooden surface. The bowls contain dried apricots, almonds, cranberries, and banana chips. A wooden scoop is also visible, filled with dried cranberries.

Strategy pillars

- 1 FOOD SAFETY
- 2 NUTRITION
- 3 SUSTAINABILITY

Asks to policymakers

- Support for sustainable and nutritious foods, which are crucial in the shift towards healthy and sustainable diets.
- Level playing field.
- Less, clear and science-based legislation with sufficient transition time.



FRUCOM products contribute to sustainable nutrition within planetary boundaries

Products such as dried fruits, nuts and peanuts are generally responsible for far fewer greenhouse gas emissions per kilogram of food compared to other agricultural products such as beef, dairy and poultry. Moreover, they are nutrient dense and provide substantial amounts of valuable nutrients, improving diet quality.

EU authorities need to support their positive contribution, focusing on the promotion of the increase of these nutrients in diets.

Level playing field: securing free trade is the key strategic goal for a reliable food system in the EU

Imports are a necessity and play a crucial role to fill in the gaps of products which cannot be produced in the EU. Our companies need **free access** to their target markets and minimal **non-tariff barriers**, as well as secure global sourcing. To achieve this, compliance with and implementation of all requirements must be **actively supported**. Only then it is possible to compete at a high-quality level.

Less and higher quality legislation structured in a proportionate and harmonised manner

The EU's farming and food systems are intrinsically linked to **trade**. FRUCOM favours less and higher quality legislation, which is focused on the **needs**, prioritises business value added, is proportionate and harmonised. It needs to reflect risk-based **food safety concerns** rather than the limits of analysis. When applied at the border, legislation needs to take into consideration subsequent **additional processing** in the EU.



When legislation changes, sufficient **transition time** is a necessity. Policymakers should also consider **non-legislative alternatives**, such as providing specific consumption advice in place of establishing a maximum regulatory level, as in the case with contaminants in certain fishery products.

Furthermore, subjects like import control regulations and mineral oil levels are not addressed in an equal manner across all the EU member states, creating **barriers** which hinder the flow of trade.

Food Safety



Asks to policymakers

- **Harmonised legislation** applicable at the EU level (e.g. MOSH, import control regulations) and applied consistently in all Member States
- Ease **administrative burden** in agri-food trade with better, targeted support to the implementation of regulations.
- Achieve a longer transition time in case of regulation changes. .
- **Statistics/data-based** approach to legislation (e.g. on official controls).
- A **solution-oriented** EU pesticides policy, with more involvement of operators.
- Creation of an EU **Organics framework** to improve organic trade.

FRUCOM monitors multiple **official channels** and reports on food safety and food law subjects, including import controls, food additives, contaminants, RASFF notifications, audits in third countries linked to food safety, etc.

FRUCOM actively engages with members and partners to support members on full compliance, in platforms such as the FRUCOM Dried Fruit, Peanuts and Nuts working group, as well as the Processed Fruit, Vegetables and Seafood working group.

FRUCOM participates in EU-led initiatives and working groups, representing its members in relevant discussions such as the **Civil Dialogue Group on Organic Farming**, **MAC** (Market Advisory Council of Fisheries and Aquaculture) and **LDAC** (Long Distance Fisheries Advisory Council).

FRUCOM manages the **pesticides and contaminants data collection project**: a comprehensive and up-to-date database of relevant residues in the nuts and dried fruits sector, as a risk-management tool.

Nutrition



FRUCOM aims to drive the consumption of healthy foods to narrow the gap between what current nutrition science defines as healthy diet and consumers' actual dietary practices.

Encouraging positive nutrition should be the priority. This approach to eating focuses on the addition of nutrient-dense foods to diets, emphasises the consumption of foods containing specific nutrients (vitamins and minerals, unsaturated fatty acids...) which have a positive impact on diet quality, instead of increasingly imposing restrictions on nutrient quantities.

Asks to policymakers

- Prioritize FRUCOM products in EU policies, as these contribute to **sustainable nutrition** within planetary boundaries.
- Support **positive nutrition**: Request the European Food Safety Authority (EFSA) to provide an opinion on intake recommendations for nuts.
- Create/make an **EU-wide recommendation** to consume more nuts as a part of a healthy dietary pattern.
- Consider introducing **campaigns** to promote FRUCOM products (similar to the one on food from the EU).
- Consider including of FRUCOM products in **programmes** such as the EU School scheme.



Nutrition



According to the systematic analysis for the Global Burden of Disease Study 2017, which evaluated the health effects of dietary risks in 195 countries, diets low in fruits, nuts and seeds and seafood omega-3 fatty acids are among the main causes of death attributed to diet at the global level. This risk is mainly linked to cardiovascular diseases. Furthermore, consumption of such foods was globally suboptimal: the largest gap between current and optimal intake was observed for nuts and seeds.

Currently, there is no EU-wide agreement on recommended portion size and frequency for nuts, since the Food-Based Dietary Guidelines of each EU country provide different quantitative and qualitative recommendations. The industry would like to see those quantities and frequency defined, to provide the consumer with clear and evidence-based information.

Influencing food choices by connecting the science of nutrition with the science of behaviour change leads to a concrete change in consumer choices.



Nutrition and Communication Working Group

Objectives:

- Focus on the **added value** of the products.
- Promote a **positive image** of the products among experts, food policy makers as well as consumers.
- Work on the **nutrition policy** and answer members' questions.
- Prepare **communication material** for members and social media.

Group deliverables:

- Contribution to FRUCOM replies to **public consultations**.
- Contribution to FRUCOM **position papers, articles, communication material**.

Areas of interest:

- Divulgence of **scientific research** in relation to FRUCOM products.
- Communication to **policy makers, associations, potential members, consumers**.
- **Policy developments** (health/nutrition claims, labelling).

Benefits and Advantages of FRUCOM Products

Unhealthy diets are a major contributor to the global burden of disease. Globally, diets low in **fruit, vegetables, nuts and seeds** are risk factors for morbidity and mortality, specifically for **cardiovascular diseases**. **Nuts and seeds, fruit, fibre and omega-3 fatty acids** intakes are below the optimal level.

FRUCOM products are a pivotal part of healthy dietary patterns, by helping to meet the nutrient requirements and therefore contributing to **diet adequacy**.



Nutrition

Walnuts contribute to the improvement of the elasticity of blood vessels and are high in omega-3 fatty acids (alpha-linolenic)

A single **Brazil nut** contains almost double the daily reference intake for selenium

Dried apricots, dates and raisins are high in potassium

Canned mackerel, tuna and sardines are high in omega-3 fatty acids (EPA+DHA) which contribute to the normal function of the heart

Canned mandarins are high in Vitamin C, while **canned tomatoes** are a source of Vitamin C

Prunes are high in vitamin K to support healthy bones and high in fibre, contributing to normal bowel function

Almonds are high in Vitamin E, which contributes to the protection of cells from oxidative stress

Hazelnuts, Figs and Dates are high in fibre

Sources:

Health effects of dietary risks in 195 countries, 1990–2017: a systematic analysis for the Global Burden of Disease Study 2017 - The Lancet [https://www.thelancet.com/article/S0140-6736\(19\)30041-8/fulltext](https://www.thelancet.com/article/S0140-6736(19)30041-8/fulltext)
Food-Based Dietary Guidelines recommendations for nuts and seeds
Food-Based Dietary Guidelines recommendations for nuts and seeds | Knowledge for policy (europa.eu)



Asks to policymakers

- Less and better legislation in consultation with stakeholders.
- Recognise private and third country sustainability initiatives.
- Focus on practical implementation – provide informative resources, such as “how to” guides and more databases, integrate these into existing platforms.

FRUCOM organises the Sustainability Working Group with its members and stakeholders to foster cooperation on sustainability.

Edible nuts and seeds:

Walnuts

US producers employ efficient irrigation methods to reduce water usage, soil health enhancements, less pesticides, carbon sequestration and reduced GHG emissions.

All parts of the tree and walnut are used: trees store carbon and are transformed into clean energy or recycled into the soil at the end of their lives. Shells are used as a renewable energy source, abrasive and as a filler, while hulls are returned to the orchard soil to provide nutrients.

Almonds

Producers in the US use all parts of the almond and almond tree. They practice “whole-orchard recycling”, where wood chips are used for soil enrichment and almond by-products are used for feed, biofuels, sugar and sweetener production. More than 80% of producers use micro irrigation systems to lower water consumption, together with other technologies to improve water efficiency.

Sustainability

Dried fruits and vegetables

Raisins

Producers in South Africa use byproducts to **raise cattle**: the water from cleaning raisins is used for **irrigation** and grape waste becomes **animal feed**.

Prunes

Producers in the US have embedded a number of sustainability initiatives in orchards to **capture carbon** and **conserve energy** while making use of **solar energy**, leveraging apiaries for crop pollination and perching owl boxes in the trees as a form of natural pest control. Water conservation efforts include the use of precise **micro-irrigation systems** to significantly reduce water usage.



Processed fruits and vegetables

Peppers

Producers in Türkiye combat the increasing water scarcity by installing **drip irrigation systems**.

Pineapples

Producers in Kenya enforce policies against coerced and **child labour**. They ensure a safe work environment, while contributing to the prosperity of local communities.

Processed fish and seafood

Tuna

Companies recognise their role and responsibilities to policymakers through their membership of organisations that advocate for better tuna **fishery management** and governance. These include the **International Seafood Sustainability Foundation (ISSF)** and the **Global Tuna Alliance (GTA)**. Importers have ensured compliance with the **IUU regulation**, implemented social initiatives, FAD free. The EU traders have invested in and encouraged Fishery Improvement Projects to move from 'responsibly sourced' to certified sustainable by the **Marine Stewardship Council (MSC)**.

Shrimps

The **Sustainable Shrimp Partnership** aims at increasing the environmental and social performance of farmers in Ecuador. It requires that all members are Aquaculture Stewardship Council (ASC) certified, use zero antibiotics, that products are **fully traceable** and have **minimal environmental impact**.

FRUCOM position papers and responses to public consultations

- Forced labour product ban
- Packaging and Packaging waste regulation disposal
- Sustainability due diligence directive proposal
- Supply chain due diligence
- Product environmental footprint
- Proposed sustainable EU food system
- Green claims directive

FRUCOM is a founding member of the EU Agri-food chain sustainability roundtable, which brings together European agri-food chain industry associations whose activities are impacted by the European legislative framework related to sustainability.



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