



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

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FRUCOM Position on a Proposed Sustainable EU food system initiative

Summary

FRUCOM wishes to address to the European Commission the following key recommendations on the proposed sustainable EU food systems initiative:

- ❖ All definitions used must be clear, logical, and convincing.
- ❖ The methodologies developed or adopted must be both sound, globally inclusive, and transparent.
- ❖ Any sustainability labelling of agri-food products should be voluntary in nature.
- ❖ Full account must be taken of the costs and burden of new policies on sustainable food systems actors.
- ❖ The initiative and its policies must be WTO compatible, coherent with the EU's own rules and its international commitments, and prioritise cooperation over unilateral measures.
- ❖ A sensible timeframe and support for implementation and compliance with the new initiative must be put in place.
- ❖ Nutrition plays a pivotal role in the shift to a sustainable food system

FRUCOM represents European Union importers, and growers, processors, and traders, of edible nuts, dried and processed fruit and vegetables, and processed fish and seafood.

Many of these products are either not produced in the EU or the production volume is not sufficient to meet the market demand, hence the need for imports. Sourcing is global, from both developed and developing countries.

FRUCOM works in close co-operation with suppliers in third countries, and some FRUCOM members also deal with organic agriculture.

FRUCOM recognises the importance of sustainable food systems in the EU and welcomes the opportunity to contribute to the European Commission's public consultation on the Sustainable EU food system initiative.

The products represented by FRUCOM are healthy and nutritious, and plant-based in their majority. They play an increasingly important role in a balanced, healthy diet, and contributing to sustainability, in line with the definition in the questionnaire:

"A sustainable food system for the EU is one that: provides and promotes safe, nutritious and healthy food of low environmental impact for all current and future EU population in a manner that itself also protects and restores the natural environment and its ecosystem services, is robust and resilient, economically



FRUCOM AISBL • RUE DE TRÈVES 49-51, BOX 14 • B - 1040 BRUSSELS • BELGIUM

EU REGISTER OF INTEREST REPRESENTATIVES (ETI): 40306802522-39

T: +32 2 231 06 38 • F: +32 2 732 67 66 • EMAIL: INFO@FRUCOM.EU • WWW.FRUCOM.EU

dynamic, just and fair, and socially acceptable and inclusive. It does so without compromising the availability of nutritious and healthy food for people living outside the EU, nor impairing their natural environment.”

FRUCOM calls on the European Commission to be especially mindful of the balance that must be struck between its policy and regulatory ambitions in relation to food systems sustainability and real market conditions faced by producers and supply chain operators whose function it is to produce the very “safe, nutritious and healthy food of low environmental impact” which the European Commission wishes to promote.

With this in mind, FRUCOM wishes to highlight some critical considerations for the industries it represents, in relation to a proposed sustainable EU food system:

❖ **Definitions that are clear, logical, and convincing, complemented by sound and transparent methodologies**

The questionnaire sets out an indicative definition of sustainable food system (above), whilst also recognising in a number of questions that there is a lack of systematic definitions and also positing that definitions relevant for the sustainability of the food system may be needed.

FRUCOM strongly encourages the Commission to adopt an approach to defining key elements of the sustainable food system that is clear, logical and convincing – that is to say, recognises the facts rather than the fantasy.

For example, the indicative definition of sustainable food system does not recognise the key question of affordability in relation to sustainable food systems, neither within the EU nor in relation to people living outside the EU. Affordable should not be taken as equating cheap, nor environmentally harmful; a food system that ignores costs will not be conducive in promoting sustainability or resilience.

These definitions must be complemented and supported by sound and transparent methodologies to measure, monitor, and set targets and goals in relation to sustainability. FRUCOM encourages the European Commission to be more forthcoming in communicating and collaborating on methodologies it intends to develop or use, and work more closely with experts as well as the very industries that have to implement the new measures, and factor in the intrinsically global nature of the EU’s food supply networks.

❖ **Sustainability labelling of agri-food products should be voluntary**

FRUCOM has been intensively engaged in the developments relating to sustainable food labelling, both with our members, for whom this is a priority issue and also with other stakeholders, including other agri-food chain representatives, retailers, and experts from academia and regulatory bodies.

FRUCOM strongly argues that sustainability labelling should remain voluntary. Without exception, all engagements on this subject have shown sustainability labelling to raise significant challenges, including in relation to methodology used for any label, the costs and practicality of adopting the labels for different operators, and the risk of jeopardising the level playing field in terms of operators within the EU and between those in the EU and outside the union.

FRUCOM recognises the consumer interest in sustainability information, the regulatory imperative to prevent greenwashing, and the value for supply chain operators to communicate the sustainability of food. As such, FRUCOM will continue to engage with enthusiasm in the ongoing work on sustainable food labelling, looks forward to the eventual proposal by the European Commission on a sustainable food labelling framework, and remains available to contribute to further discussions on this topic.



❖ **The costs and burden of new policies relating to sustainable food systems must be fully accounted for**

The financial and resource costs for the agri-food chain to comply with a new policy framework to meet the ambitions of the European Commission in relation to sustainable food systems are not a trivial matter, and must be acknowledged and accounted for in the process of their development.

These costs are especially onerous for agri-food chain operators that are part of complex and highly diffuse supply chains outside of the EU, as is the case with many FRUCOM members producing or importing products that are critical to meet EU demand.

Adding more policies and obligations to the already crowded regulatory space for the agri-food sector will certainly result in increased costs, especially at the point of production which is where compliance begins. These increased costs will undoubtedly be passed on to the consumer, at a time of unprecedented inflation and concerns about food and nutrition security.

FRUCOM calls on the European Commission to undertake a comprehensive, transparent, and participatory evaluation of the cost-related risks and implications of any new rules or obligations that may emanate from this new sustainable food systems initiative.

❖ **New initiatives should be WTO compatible, coherent, and be based on cooperation**

Given that trade plays an essential role in ensuring food security and the livelihoods of agri-food producers in the European Union and worldwide, it is incumbent on the European Commission to ensure that the sustainable food systems initiative is not only compatible with WTO rules, but will not alienate or antagonise the very trade partners that the EU depends in for key agricultural goods.

A cooperative and collaborative approach, rather than a web of unilateral measures, can do more to further the very sustainable food systems approach that is so important for the EU and the world at large. In this regard, it is both surprising and disappointing to note the absence of the Commission services on trade as part of the supporting directorates participating the this policy initiative.

A number of important unilateral policies and international undertakings addressing different dimensions of sustainability are already in play within the EU, and the sustainable food systems initiative should itself be coherent with existing rules. It is therefore vital that the European Commission avoids directing valuable time and resources to duplicate agreements, discussions, or initiatives that are already otherwise covered via existing or forthcoming policies.

FRUCOM therefore strongly encourages the European Commission to look carefully at the trade implications of the sustainable food systems initiative, recognise the significant advances of existing initiatives in terms of promoting sustainability in both the EU and for imported goods (e.g. proposed regulation on deforestation-free products), and establish a more determined framework for mutual engagement and cooperation with partner countries on this subject.

This spirit of cooperation should extend also to all operators in the agri-food supply chain, and the European Commission should facilitate and promote greater collaboration between agri-food chain actors in relation to sustainability, so that meeting present and future sustainability obligations is a shared venture and not one the burden will be unevenly applied.



This cooperation and coherence means that there must be a recognition of the investments and advancements already carried out by agri-food chain operators in relation to sustainability, both in the EU and in third countries.

❖ **Put in place a sensible timeframe and support for implementation and compliance**

In order to realise the lofty ambitions of the sustainable food systems initiative, agri-food chain operators will need to be afforded the time and support needed to understand and adapt their operations to the new framework. FRUCOM calls on the European Commission to ensure that any targets must be set only based on feasibility that takes into account the support and timeframe that is needed for the agri-food chain to adapt.

Support is critical to ensure that all stakeholders get the best out of this new framework, and it can be in the form of more resources being invested by the EU into long-term research, education, outreach (including extension services to producers) which means that affected parties all through the supply chain, from producers up, can best understand and evaluate what is needed from them in terms of contributing to the sustainability of the EU food system.

The time to adapt and implement the changes is also fundamental to the success of this new initiative, to avoid disengagement from food system actors worried that they are being rushed or that the transition to greater sustainability is outpacing their capacity and means. This is particularly the case with SMEs, who in fact, make up the bulk of the EU agri-food chain.

❖ **The role of nutrition in the shift to a sustainable food system**

Nutrition and sustainability are tightly linked. The involvement of every food system actor is key to reshaping the food system and promoting healthy and sustainable diets (e.g., environmentally sustainable, socially acceptable, affordable, and flexible to adapt to individual values and preferences).

On the one hand, there is a need to address nutrition-related issues such as malnutrition (both in excess and in defect). Integrating sustainability in this process is also increasingly urgent. Our current food production and consumption are not compatible with the growing global population, and this is a serious threat to global food security.

Focus should be put on how to best reconcile public health and food security, optimising the use of the planet's available resources. To achieve this goal, sustainability targets should also be included in dietary recommendations and food-based dietary guidelines (FBDGs).

Frucom supports political initiatives based on science, for the enhancement of public health.

Dried fruit contains naturally occurring sugars. Despite this, dried fruit is also included in the 400g/5 portion of fruit and vegetables a day recommended by WHO, and provides minerals, vitamins, dietary fibre and antioxidants such as anthocyanins. Therefore, it has a significant nutritional value.

In conclusion, when implementing certain measures (e.g., food composition targets, policies that impact food prices, marketing and sponsorship restrictions), a holistic approach should be followed to take into account the positive role of each food and their role in a healthy diet. The nutritional value of food such as dried fruit should be taken into consideration, as well as their potential positive impact on the consumers' health if included in a healthy lifestyle and consumed without exceeding the dietary recommendations. It is important to raise the consumers' awareness of the essential role of food variety, portions, and occurrence in a balanced diet. For effective action, consumer education should thus be included and reinforced through national political and health initiatives.



FRUCOM remains available to provide further information on the above stated recommendations, and is interested in being included in future discussions on this topic.

