

Farm to Fork Strategy Primary Food Processors position

1. Primary Food Processors: a unique role in the transition towards sustainable food systems

Primary Food Processors (PFP) is an alliance composed of 6 trade associations, representing manufacturers of sugar, starch, wheat flour, vegetable proteins, cocoa, and vegetable oil and protein meal products, respectively. The principal activity of PFP members is to process agricultural raw materials into a range of commodities and ingredients that are purchased by secondary processors for food, feed, and non-food uses. The PFP sectors together directly employ over 120,000 people in the EU and provide one million indirect jobs.

The unique position of the PFP sectors as a key link in the supply chain puts PFP at the center of a number of major developments that will shape the future of the primary food processing industry itself, and also of EU agriculture.

Primary Food Processors are a strong supporter of the holistic approach to making the EU food system more sustainable. We welcome recognition of the central role of food systems in the transition to a more sustainable EU economy and the fact that the Commission Communication on an EU Farm to Fork Strategy, is placed at the heart of the EU Green Deal architecture. Work is not starting from scratch. Over the years, substantial efforts have been made by Primary Food Processors playing a major role in securing food availability and safety, as well as rural development and farm incomes.

Furthermore, PFP sectors are a key driving force behind the development of new bio-based industries, increasing sustainability of the European economy as a whole. Recognizing the importance of increasing the sustainability of the food chain, PFP considers it crucial to maintain the high EU food safety standards as the top priority, when implementing the future Farm to Fork strategy. Similarly, the COVID 19 pandemic has put even stronger emphasis on food security and on the need to maintain or even enhance the resilience of the agri-food supply chain. The proposed changes will inevitably lead to political trade-offs involving important societal shifts, which should be clearly highlighted, assessed and publicly debated.

Science-based policy-making and a practice-oriented approach to risk management decisions are crucial, taking into account the livelihood of agricultural communities, while considering economically viable alternatives and innovation.

We look forward to working closely with the EU institutions in the elaboration of the detailed measures listed in the draft action plan annexed to the strategy.

The strategy is ambitious in its objectives and scope, hence close coordination of these measures and thorough impact assessments, closely involving stakeholders, will be a pre-requisite to the strategy's successful implementation, particularly against the background of the ongoing COVID 19 pandemic. These impact assessments must ensure that any new initiatives not only make a genuine contribution to a more sustainable food system, but also do not negatively impact food safety, food security or the economic sustainability of any actors in the food supply chain.

2. Comments on the measures proposed in the Commission Communication

- To ensure sustainable primary production and a global transition:
 - The **CAP must support EU farmers'** income & role with an appropriate budget, incentives to tackle increased environmental and climate change aspects, and **reinforce the EU single market.**
 - The **reduction of the use & risk of chemical pesticides** must take place at a **realistic pace, while ensuring** availability of viable alternatives and agricultural practices like Integrated Pest Management (IPM). Particularly, **tailor-made transition measures** are crucial to avoid disruptions, as changes cannot take place in one day.
 - **New Genomic Techniques play an important role to improve crops** (e.g. enhance plant tolerance to drought) **and have the potential to accelerate the transition towards less pesticides** and improve food quality. PFP sincerely hopes that the results of the Commission study on the status of New Genomic Techniques will finally lead to a sound regulatory framework based on state-of-the-art scientific expertise and evidence. **An adapted regulatory framework should be set without delay.**
 - PFP supports the objective to further **increase current EU organic farming**, however any initiative should consider achievable targets, avoiding undermining emerging markets and including **appropriate enablers**. Implications on the primary processing sectors should be carefully considered for the increase of organic farming production to translate into a growing share of organic food products at the end.
 - Trade considerations should be an integral part of the Strategy. The EU has established a set of instruments in trade and international cooperation. A **coherent approach** is needed between **EU domestic & trade policy** via a level-playing field, while recognizing the specificities of EU production.
- **To stimulate sustainable food processing and consumption** facilitating the shift towards healthy and sustainable diets
 - PFP considers that any EU harmonized **FOP nutrition labelling** must be **based on scientific evidence** and ensure that is clearly understood by the consumer without adding further confusion.

- PFP considers that the current legal framework on **voluntary Country of Origin Labelling** (COOL) is adequate and would not support the introduction of mandatory requirements for PFP products. Whilst consumers believe there is a link between the origin of the food product and their quality, this does not match the reality of PFP products that are standardized ingredients or where the quality depends on the know-how of the specific sector, irrespective of the origin.
- Any part of **agricultural raw materials**, that is not edible, and/or that is not – and never was – intended for human consumption, **should not be considered as food waste**, so as not to hinder the global resource efficiency of the food chain. As such, **primary food processors do not produce any food waste**.
- **Evaluations of existing measures proposed in the Farm to Fork strategy** are needed to ensure that they are still framed, taking stock of the observed accomplishments and limitations.

Conclusions

The Farm to Fork strategy outlines an ambitious plan for a comprehensive food system change. While the strategy provides the targets, it remains to be seen whether access to new tools, technologies and financial means will be available for the successful implementation of these shifts to enhanced sustainability. Much will also depend on the common understanding and acceptance of these shared objectives and their implications. Primary Food Processors will be key enablers in the move towards a more sustainable food system. EU policies need to reflect the sector's potential and challenges. With that policy support and building on what already achieved, Primary Food processors can play a key role in meeting changing consumer needs and developing a more efficient and sustainable food system, whilst maintaining the need for food security and food safety.

The **Primary Food Processors of the EU (PFP)** is composed by:

European Committee of Sugar Manufacturers (CEFS)

European Cocoa Association (ECA)

European Flour Milling Association (European Flour Millers)

European Vegetable Protein Association (EUVEPRO)

European Vegetable Oil and Proteinmeal Industry (FEDIOL)

European Starch Industry Association (Starch Europe)

PFP members process approximately 220 Million tons of raw materials (cereals, sugar beet, rapeseeds, soybeans, sunflower seeds, crude vegetable oil, cocoa products, starch potatoes...) employing over 120 000 people in the European Union.