

FruitVegetablesEUROPE's feedback:

Roadmap on the Sustainable food – 'farm to fork' strategy.'

The **European Fruit and Vegetables Association** (FruitVegetablesEUROPE) welcomes the opportunity to comment on the European Commission's roadmap on the **Farm to Fork Strategy for Sustainable Food** and appreciates the opportunity to provide comments and input ahead of its adoption.

FruitVegetablesEUROPE (EUROFEL) is the European private sectoral Association representing the European Fruit and Vegetables producers and exporters at the EU level. FruitVegetablesEUROPE's members are national and regional Federations and Associations (mainly PO and APO) and companies from the main European producing countries (France, Germany, Greece, Italy, Poland, Portugal, and Spain). FruitVegetablesEUROPE's direct members account for more than 4,500 companies.

FruitVegetablesEUROPE and its members are committed to the Farm to Fork (FTF) strategy. Protection of the environment and food safety are two main pillars of the sector. This is why we have high expectations in fulfilling its goals and ensure the sustainability of the food chain. Nevertheless, we are concerned about the impacts it might have on the farmer's income and the competitiveness of the sector.

FruitVegetablesEUROPE agrees that a sustainable food strategy is key to achieving the goals of the EU's Green Deal. Furthermore, the FTF strategy needs to set out regulatory and non-regulatory actions to create more efficient, climate-smart systems that provide healthy food while securing a decent living for EU farmers.

FruitVegetablesEUROPE welcomes many of the initial ideas outlined in the Green Deal communication and the Farm to Fork roadmap. Nevertheless, we would like to contribute to these following areas:

1. Pesticides, fertilizers and endocrine disruptors

As Health Commissioner Stella Kyriakides has claimed several times, reducing the use of pesticides, fertilizers and antibiotics is a priority of the FTF strategy. In that sense, we consider that:

- The reduction of the use of pesticides needs to be driven on scientific criteria, avoiding rhetoric-based statements.
- Policies must be coherent and avoid fragmentation of standards in different legislations.
- The European Commission must present comprehensible alternatives to the use of the current pesticides. Farmers need new tools to control weeds, insect infestation, and diseases.

Climate change is already affecting the production of European farmers. Issues as extreme weather and new invasive alien species are causing substantial economic losses. In this regard, the reduction of pesticides cannot lead to an increase in production costs. This would put further pressure on European Fruit and Vegetables producers.

2. Circular Economy

FruitVegetablesEUROPE and its members are working on the Fruit and Vegetable production challenges regarding the Circular Economy. The goal is to contribute to a sustainable food system that has a neutral environmental impact. Among the main challenges the sector tackled, we encourage to take action in:

- a) Initiatives for producers to carry out self-management of organic waste.

We are facing many problems due to administrative procedures, especially in the case of plant remains using composting and vermicomposting techniques. Regulatory barriers prevent the self-management of organic waste in the short term. Consequently, the producer opts for a faster management route, such as the dump.

The use of the landfill site represents an extra cost for the producer and an opportunity loss to make farms more sustainable. If we want to encourage self-management of organic waste, these administrative procedures should be reduced. Moreover, it will be useful to create and distribute handbooks to guide producers on the best conditions for their safe implementation of organic waste.

b) Oil waste management:

Farms with combustion equipment and vehicles produce waste oil. These oils must be delivered to the Integrated Waste Oil Management System (SIGAUS). However, the SIGAUS centers do not accept oils from self-maintenance. These points are private centers that only take the delivery of waste oils from the maintenance work carried out by themselves, not from waste oils from farms.

c) Plastic waste management:

Manufacturers, importers, intra-community purchasers, or those who place on the market plastics for use on farms should take responsibility for the correct management of the waste produced. To this end, waste should be managed through authorized management bodies, such as the integrated management systems.

d) Packaging of phytosanitary products and fertilizers:

Phytosanitary product packaging with the SIGFITO logo (Fertilizer Packaging Collection System) must be managed through its integrated management system. However, packaging without this logo must be handed over to its distributor or an authorized manager.

SIGFITO's scope of activity has been extended to agricultural packaging, so it can also manage the packaging of fertilizer products. However, some manufacturers and marketers are not members of SIGFITO and do not take responsibility for the waste produced.

We propose to increase control over manufacturers and marketers of plant protection products to ensure that they take charge of management.

3. Food Waste

The European Fruit and Vegetables sector is aware of and engaged in the fight against food waste. A part of our product is lost both at origin and during transport. For this reason, we recommend that the FTF consider the following aspects:

- Make investments to improve the Fruit and Vegetables transport between the source and the consumer/retailer.
- Improve the condition of the storage infrastructure.
- Integrate food loss and waste in education and professional training, both public and private sectors.
- Carry out educational actions for buyers concerning the consumption period and alternatives uses of fresh products.



- it is necessary to urgently act to reduce the food waste and food losses at the EU level.
- EU conventional Agriculture complies with the most demanding standards of quality and food safety in the world. Therefore, not only organic agriculture should be considered.
- it is necessary to increase the number of actions regarding the information and promotion of the EU mandatory labelling of origin, particularly for Fruit and Vegetables, within the EU.
- we need concise and realistic proposals that are backed by strong budgetary support.

FruitVegetablesEurope believes that no one is to be left behind; the environmental transition cannot leave the burden on European farmers. European farmers are struggling to keep the sector alive, which is very much affected by intense international competition.

Finally, FruitVegetablesEurope encourages the European Commission for more coherence in the EU policies affecting the EU Agriculture sector. The coherence of EU Policies and its adaptation to the new Green Deal and the Farm to Fork strategies should be a priority.

FruitVegetablesEUROPE looks forward to working closely with the European Commission, the European Parliament and the Council to develop the best sustainable Farm to Fork strategy and remains at your disposal to discuss them in more detail.

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