



Mr Janusz Wojciechowski
 Commissioner for Agriculture
 and Rural Development
 European Commission Rue de
 la Loi, 200 B-1049 Brussels

Brussels, 16th December 2021

Re: The agri-food sector’s concerns over the 2022 Annual Work Programme of the EU Promotion Policy and the need to take these into account in the revision of the Promotion Policy

Dear Commissioner Wojciechowski,

The undersigned 12 European agri-food sector organisations listed below would like to express their concerns over 2022 Annual Work Programme (AWP) of the Promotion Policy adopted by the Commission.

We are extremely concerned about both the introduction of an award sub-criterion discriminating red meat and alcoholic drinks and the imbalanced allocation of the 2022 Annual Work Programme budget.

1. Introduction of a new award sub-criterion discriminating red meat and alcoholic drinks:

In Annex 2, under the “Relevance” award criterion, the 2022 AWP introduces a modification to the new sub-criterion introduced last year on the alignment of the programmes with the climate and environmental objectives of the new CAP, the Green Deal and the Farm to Fork Strategy with a specific focus on the sustainability of food production and consumption. This goes for both multi and simple programmes targeting the EU internal market. The modification states that *“For proposals targeting the internal market, alignment with the objectives of Europe’s Beating Cancer Plan, in particular encouraging the shift to a more plant-based diet, with less red and*

processed meat and other foods linked to cancer risks (e.g. alcoholic drinks)”.

Firstly, we question the legal basis of a sub-criterion for promotion programmes requiring them to contribute to the European Green Deal, the Farm to Fork strategy and Europe's Beating Cancer. For the time being these Communications have not materialized into legislations and are not legally-binding. This issue, was also raised by several Member States during the vote on the 2022 AWP.

Furthermore, we are greatly alarmed by this new sub-criterion. It is discriminating against a series of high-quality EU agricultural products that have always been at the heart of EU agri-food production and that the Promotion Policy is supposed to strengthen. Indeed, this sub-criterion means that all applications for programmes for red and processed meat products, as well as wine, targeting the internal market, will start at a disadvantage compared to other applications, regardless of whether they are applying for the quality schemes, the organic or the sustainability sections of the budget.

The livestock sector represent 45% of the total agricultural activity in the EU and generates direct jobs for 4 million people and indirectly supports the work of 30 million people, mostly in rural areas.¹ While EU wine production accounts for 65% of the global wine production and around 3 million also mostly located in rural areas². Starting to discriminate against those sectors in a European policy dedicated to strengthening the competitiveness of EU agriculture would be highly detrimental and send the wrong message to the millions of producers and workers striving to continue their activity while increasing the sustainability of their production.

With regard to the alignment of the promotion programmes with the Europe's Beating Cancer Plan objectives, we would like to underline that red meat has an important role to play in a balanced diet as it is an important source of high-quality proteins, iron, zinc, vitamins B12 and A, and other important nutrients³, and that the link between red meat consumption and cancer risk is highly contested by the scientific community⁴. With regard to wine, it is the harmful consumption of alcohol that is linked to cancer risks⁶, while a moderate consumption of wine in the context of a balanced diet does not increase the risk of cancer. Commission Communication on Europe's Beating Cancer Plan⁷ clearly states, the focus shall be put on the harmful consumption of alcohol. The message of the Promotion Policy programmes has always been to support and encourage moderate consumption, focusing only PGI or PDO wine and those types of high-quality products rarely associated with the harmful consumption of alcohol. It would thus be more appropriate to focus on the messages that accompany those products' promotion programmes rather than discriminating against them directly.

Furthermore, concerning the alignment with the Farm to Fork Strategy and its objective for sustainable production, we would like to underline that the communication states that *“In relation to meat, that review should focus on how the EU can use its promotion programme to support the most sustainable, carbon-efficient methods of livestock production.”*. How the Promotion Policy can help to increase the sustainability of sectors if instead of promoting their sustainability efforts, it stigmatises them. The meat sector, like many others, has already done a lot to improve its sustainability and is willing to go

¹http://animaltaskforce.eu/Portals/0/ATF/Downloads/Facts%20and%20figures%20sustainable%20and%20competitive%20livestock%20sector%20in%20EU_FINAL.pdf

² https://www.ceev.eu/wp-content/uploads/2019/11/Brochure_CEEV_-_High_resolution.pdf

³ WHO: https://www.who.int/nutrition/topics/3_foodconsumption/en/index4.html

⁴ Unprocessed Red Meat and Processed Meat Consumption: Dietary Guideline Recommendations From the Nutritional Recommendations (NutriRECS) Consortium: <https://www.acpjournals.org/doi/10.7326/M19-1621>

⁵ PURE: Healthy Diet Including Dairy and Meats May Be Good For Hearts Worldwide: <https://www.acc.org/latest-in-cardiology/articles/2018/08/22/14/15/tues-515am-pure-esc-2018>

⁶ “Global alcohol action plan 2022-2030 to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol”, Second draft (unedited), WHO, 04.10.2021 <https://www.who.int/publications/m/item/global-alcohol-action-plan-second-draft-unedited>

⁷ https://ec.europa.eu/health/sites/default/files/non_communicable_diseases/docs/eu_cancer-plan_en.pdf

further. It is crucial to support the sector in this journey, not discourage it to increase its sustainability even more.

Finally, we also would like to recall that in the context of their vote on this 2022 AWP several Member States have expressed their discontent over the Commission proposal, underlining that all products should be equally promoted, some even pointing out the legality issue of aligning the AWP with non-legislative texts such as Europe's Beating Cancer Plan. This resulted in a 'no opinion' from Member States, which was simply overlooked, as the 2022 AWP proposal presented to them was not modified. We are astonished that the legal issue raised and this exceptional situation regarding the opinion of Member States did not lead to a re-drafting of the proposed 2022 AWP.

In light of the above, we invite the Commission to act upon the Member States' concerns and to ensure that the 2022 AWP does not discriminate any specific sector.

2. The imbalanced allocation of the 2022 Annual Work Programme budget

The draft AWP provides an even larger budget for the internal organic market with an increase from €6 to €14m for simple and from €17 to €18m for multi programmes. We would like to call for a budget allocation that strikes a balance between actions on organic and the sections for generic sustainability promotion and quality, because economic, environmental and social sustainability is much broader than organic farming alone. Moreover, the promotion policy should remain demand-driven and operators should be able to respond to the opportunities offered by the market. This will allow better support for the various sustainable practices and thus maximise the benefits and the contribution of the Promotion Policy. It will also be fairer to all the producers who, despite not being certified as organic, are making considerable efforts to increase the sustainability of their production. For the international market, considering the lack of interest from organic producers due to the market reality, we support the Commission's decision to set out a section dedicated to both organic and sustainability together.

The EU Promotion Policy is an essential tool for the EU agri-food sector, particularly in the context of Brexit and the COVID-19 crisis. If adequately designed it can truly support the sector to maintain its competitiveness in an increasingly globalised environment while supporting a shift to a more sustainable food system. However, to ensure this objective, it is crucial to leave no one behind and support producers' efforts towards more sustainability in an extremely competitive environment. We thus urge the Commission to ensure a non-discriminatory evaluation of the applications for the 2022 AWP and to design an inclusive legislative proposal for the revision of the Promotion Policy.

We would appreciate being able to meet with you at your earliest convenience to exchange further on this important topic.

We thank you for your attention.

Yours faithfully,

On behalf of the following organisations:

AREFLH - The Assembly of European Fruit, Vegetable and Horticultural Regions

AVEC - Association of Poultry Processors and Poultry Trade in the EU countries

CEJA - European Council of Young Farmers

CELCAA - European Liaison Committee for Agricultural and Agri-Food Trade

CLITRAVI - Liaison Centre for the Meat Processing Industry in the European Union

Copa-Cogeca - The united voice of farmers and their cooperatives in the European Union

EDA - European Dairy Association

EFFAB - European Forum of Farm Animal Breeders

EFOW – European Federation of Origin Wines

EUROPATAT - European Potato Trade Association

FRESHFEL - European Fresh Produce Association

OriGin EU - The Organization for an International Geographical Indications Network

Cc:

Roberto Berutti, Member of Cabinet in Mr Wojciechowski's Cabinet

Valdis Dombrovskis, Executive Vice-President for an Economy that Works for People

Cristina Rueda-Catry, Cabinet Expert in Mr Dombrovskis' Cabinet

Johannes Hahn, Commissioner for Budget and Administration

Christiane Kirketerp de Viron, Member of Mr Hahn's Cabinet

Thierry Breton, Commissioner for the Internal Market

Anna Ablazevica, Policy Assistant in Mr Breton's Cabinet

Mairead McGuinness, Commissioner for Financial Services, Financial Stability and Capital Markets Union

Katie Power, Policy Coordinator in Ms McGuinness' Cabinet

Wolfgang Burtscher, Director-General DG AGRI

Nathalie Sauze Vandevyver, Director DG AGRI

Christina Gerstgrasser, Head of Unit DG AGRI

Permanent Representation of Czech Republic

Permanent Representation of France

Permanent Representation of Greece

Permanent Representation of Hungary

Permanent Representation of Italy

Permanent Representation of Poland

Permanent Representation of Portugal

Permanent Representation of Romania

Permanent Representation of Slovakia

Permanent Representation of Spain