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Ms Stella Kyriakides
Commissioner for Health and
Food Safety
European Commission
Rue de la Loi 200
BE-1000 Brussels

Brussels, 25th June 2020

Re: Joint Copa and Cogeca Praesidia meeting – exchange of views on the Farm to Fork Strategy

Dear Commissioner,

The European farmers and agri-cooperatives would like to thank you for your participation in the joint Copa and Cogeca Praesidia meeting on 18th June and the exchange of views on the Farm to Fork Strategy.

Copa and Cogeca, its farmers and agri-cooperative members, welcome the opportunity to contribute to a more sustainable EU food system tackling climate change, preserving the environment and enhancing consumer health. Farmers and agri-cooperatives will be the main contributors to achieving the Farm to Fork Strategy's ambitious objectives. Therefore, we would like to stress that it is vital to ensure that they are fully involved in the discussion on this strategy's specific targets as well as on the implementation of measures to attain them.

While these objectives are absolutely valid and relevant, the strategies and policy tools used to achieve them must be carefully analysed and assessed, especially for the sectors that were hit hard by the COVID-19 crisis. A steady supply of food and raw materials during this period did not just happen, it was the result of hard work and extraordinary effort of all European farmers and their cooperatives. We must therefore adopt a careful approach regarding the measures and requirements imposed on EU farms and agricultural cooperatives. Disproportionate restrictions impacting food security and the sustainability of the sector must not be introduced without proper alternatives and a thorough impact assessment. Furthermore, we expect that, given the international realities, EU farmers will be treated fairly in regards to their non-EU counterparts (e.g. especially if Commission decisions are not science based).

The Commission's MFF proposal released on Wednesday 27th May is an improvement on the previous 2018 package. However, in 2018 prices, the Commission is proposing a lower CAP expenditure, which would mean that the EU agricultural sector will be expected to recover from the COVID-19 pandemic and transition to more sustainable production methods with less public support. The Commission already pointed out the lack of funds when introducing the first COVID-19 market management package. In combination with the very limited concrete EU-level assistance for necessary investments in agriculture and in other policy areas, such as a better functioning food chain, new breeding techniques (NBTs), low-risk substances and a digital agenda in rural areas, the future of farming does not look bright.

In general, imposing a reduction in the use of inputs in agricultural production is neither realistic nor desirable. Due to the costs involved, farmers have a rational approach towards the use of inputs, in particular regarding plant protection products, fertilisers, and antimicrobials.

The latter importantly guarantee the safety of agricultural products entering the food chain and ensure that products are produced in sufficient quantities. Therefore, we believe that the current targets on plant protection products, antimicrobials, and fertilisers as proposed in the Farm to Fork Strategy would threaten EU food security and food safety if farmers are not equipped with a toolbox of efficient alternatives. Moreover, these alternatives should be both efficient and affordable and farmers should be provided with the necessary support to implement them. We would like to underline that sustainability encompasses three key pillars: environmental, social and economic sustainability. Indeed, it is not possible to achieve one without the others.

We would also like to stress that the requirements and challenges involved in meeting this very ambitious target – more than tripling organic surface area in the EU by 2030 – are extremely high. A growing sustainable organic sector must rely on a long-term increase in demand both in the EU and on export markets. Indeed, the Commission must take action to ensure that this is the case. Furthermore, it is also essential to ensure that the growth in demand is linked to EU organic products and not to those that are imported. Ultimately, it is important to make sure that farmers and scientists are involved in helping to improve production and in increasing organic yields. It is essential to ensure that this target will not jeopardise food security.

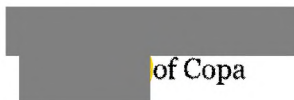
Concerning the measures directed at helping consumers to make healthier and more sustainable food choices, we welcome any policies that could contribute to improving consumers' eating habits and their general good health. However, we would like to warn against any measures that could have counterproductive health effects and undesirable economic impacts. More specifically, we believe that mandatory colour-coded front-of-pack nutrition labelling and nutrient profiles that indiscriminately target all types of products would be highly detrimental to both consumer health and the well-being of the agricultural sector.

Finally, to put the aforementioned elements into practice, we would like to stress once again that farmers and agri-cooperatives need to be part of any debates, be they ongoing or in the future, on the development of the related action plans and on the implementation of the strategy. Although the strategy indicates the direction, the implementation must be based on a voluntary and not a regulatory approach. Furthermore, any future actions should ensure flexibility, sufficient financial support and take into account economic, social and cultural requirements as well as regional and local characteristics.

We hope that you will take our concerns into consideration. We are looking forward to working in close collaboration with you to ensure a more sustainable EU food system that will be more environmentally friendly while also guaranteeing food security and the survival of the EU agricultural sector.

We would be honoured to have an exchange of views with you on this topic in the near future.

Yours faithfully,



of Copa



Cogeca