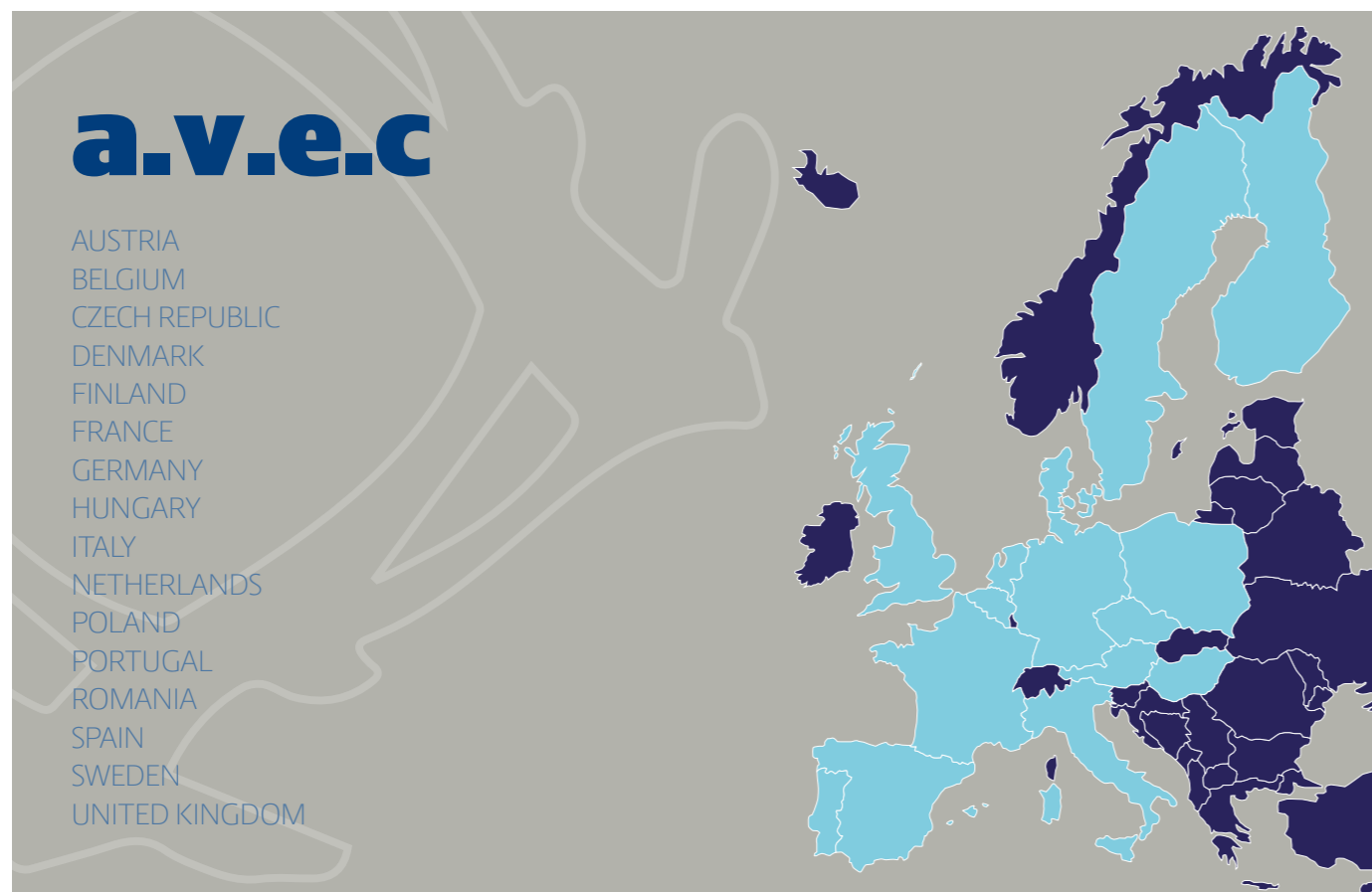




EUROPEAN POULTRY INDUSTRY AND TRADE - POLICY PAPER



Presentation of the association

a.v.e.c., the association of Poultry Processors and Poultry Trade in the EU countries, is the voice of the EU Poultry industry towards the European institutions. The members of a.v.e.c. are national organisations representing companies in 16 EU countries that are processing and trading the meat of the different poultry species as chicken, turkey, duck and goose. Their share is more than 90% of the total EU poultry meat production representing 13 million tons. The sector employs more than 300.000 citizens and the total value of production is estimated at 32 billion Euros.

The a.v.e.c. secretariat is based in Brussels. a.v.e.c. is member of the International poultry Council (IPC) that represent about 90% of the broiler production and about 95% of the world poultry trade: www.internationalpoultrycouncil.org.

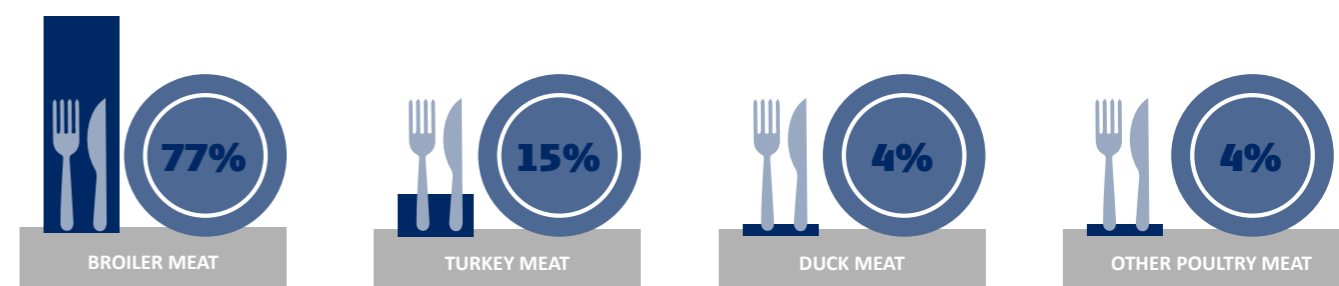
a.v.e.c. reports each year about its activities and the main issues interesting the poultry meat industry. The annual reports are published on a.v.e.c. website: www.avec-poultry.eu/annual-reports-overview.

Presentation of the EU poultry meat sector:

In 2013 the production of poultry meat in EU-27 was over 13 million tons, of which 77% was broiler meat, 15% turkey and 4% duck. The EU is an important player in international trade of poultry meat. In 2013 the EU exported 1,43 million tons poultry meat with a value of €2,077 billion (average €146 per 100 kg), while it imported 0,809 million tons with a value of €2,090 billion (average €258 per 100 kg). Poultry meat combines the advantages of being an affordable source of protein with low fat content and low carbon emissions without conveying any religious restrictions. On average a European citizen consumes annually almost 24 kilos of poultry meat.

Globally, poultry meat consumption is predicted to overcome pork consumption in 2020 and increasing by 27 % through 2023. However, this may largely benefit third countries such as Brazil, China and the USA, while only marginally will affect Europe, which is struggling to see the equivalence of its high production standards against competitors.

Source:
www.avec-poultry.eu



12 PRIORITIES FOR THE

POULTRY MEAT SECTOR

GENERAL PRINCIPLES

- 1 A constant and constructive dialogue with the competent authorities of the EU is required in order to achieve a reduction of the administrative burden and a harmonized interpretation and implementation of the EU law. The competitiveness of the EU industry and the level playing field within the EU and with its main competitors in North and South America and Asia needs full attention.

*Read more on GENERAL PRINCIPLES
- click here or go to page 6*

FOOD SAFETY / FOOD QUALITY

- 2 European poultry businesses have hugely invested in the holistic farm-to-fork hygiene policy that may be considered as the best and most sustainable system to guarantee the safety of the products. Therefore it should be defended and promoted.
- 3 European poultry meat inspection should be focusing more on the microbiological than the visual aspects.
- 4 Official controls and the costs involved should be risk-based, relevant, and fit-for-purpose. The costs of official inspection should be fairly shared between the private business and the competent authority to promote efficient controls on both private and public.
- 5 All products containing more than 25 % of poultry meat should be mandatory labelled with the country or region of origin.

*Read more on FOOD SAFETY
- click here or go to page 7*

*Read more on FOOD QUALITY
- click here or go to page 10*

SUSTAINABLE PRODUCTION

- 6 Intensive poultry production is sustainable since it makes efficient use of natural resources which generates low greenhouse gas emissions. Its contribution to EU food security is therefore essential.

*Read more on SUSTAINABLE PRODUCTION
- click here or go to page 12*

ANIMAL HEALTH AND WELFARE

- 7 The “One health” strategy of the EU: the European poultry industry participates strongly to initiatives aiming at reducing the use of antibiotics in livestock and companion animals along the principle “as much as needed, as little as possible”.
- 8 Animal based welfare indicators may be a good tool to monitor the welfare level at different stages in the production chain. But the introduction by public rules should be aligned between Member States to avoid it is harming the optimal functioning of the internal market.

*Read more on ANIMAL HEALTH AND WELFARE
- click here or go to page 13*

INTERNATIONAL TRADE

- 9 Third countries need to recognise the EU-28 as an internal and single market. The SPS procedures each individual country has to pass for getting access to a third country must be simplified, which should be a prerequisite for any trade agreements with third countries.
- 10 Since more than 90% of the European poultry production is in conventional systems efficiently organised, the programs to support market access for poultry meat in third countries should cover also these conventional products.
- 11 Imports should satisfy identical rules as the ones imposed on EU producers instead of solely “equivalent” rules. If all EU high standards of animal welfare, production process hygiene, food quality and environmental sustainability are not applied on the exact same way, duties should be maintained to protect EU producers from dumped imports.
- 12 The animal health and welfare, environmental and food safety standards imposed on European producers have to be defended and promoted in international organization such as OIE, FAO, WTO, and CODEX ALIMENTARIUS.

*Read more on INTERNATIONAL TRADE
- click here or go to page 16*

GENERAL PRINCIPLES

Reduction of the administrative burden and harmonized implementation of the EU law

a.v.e.c. advocates better EU legislation by more harmonization and coordination of interpretation and implementation by the Member States to improve both the level playing field on the internal market and the competitiveness of the industry on the global market place.

EU producers are confronted with different interpretations and implementations of the legislation across the EU at the expense of the functioning of the internal market that will finally undermine the competitiveness of the European food producers. a.v.e.c. welcomes the Commission commitment to assess if the legislative framework is still “fit for purpose”. However we request prudence in the REFIT activity especially with the introduction of subsidiarity that may threaten the well-functioning of the internal market if this principle will not be properly applied.

Priority should be given to harmonised interpretation and proper implementation and enforcement of existing legislation above the introduction of new legislation.

Open communication lines between stakeholders and EU institutions

Constructive debate and constant communication between the legislator and different stakeholders is essential for practical, efficient and effective legislation. Existing good practices of active involvement of stakeholders by European institutions should be maintained and be used for further improvement of engagement of the relevant stakeholders in the consultation process. This is a mutual interest of both public and private representatives.

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FOOD SAFETY

The food business operator is the first responsible for food safety. The role of the competent authority is to supervise and control food businesses to ensure consumers may be confident that the food on the market is safe. The supervision and inspections should be risk based which means that the level and frequency of official controls is taking into account the performance of the food business operator. We consider the perceived increasing number of food safety alerts as the result of the improvements of the private and official controls above the increased awareness.

Food hygiene - modernization poultry meat inspection- microbiological criteria

The Commission is working on the revision of the meat inspection and of the hygiene package focusing on delivering a more risk-based system. For the identification of public health risk the food chain information and microbiological controls is much more relevant than the visual inspection today which is the way to detect quality deficiencies. The Report from the Commission on the experience gained from the application of the hygiene Regulations (EC) No 852/2004, (EC) No 853/2004

and (EC) No 854/2004 found widespread difficulties and called for a revision of the meat inspection process in particular. In light of the “delivering smart regulation” principle, the Commission intends to carefully look to the possible disproportionate approach for the safety of certain products at import and reduce the administrative burdens.

a.v.e.c. is strongly supporting the idea of developing a new “approach” on poultry meat inspection, introducing risk-based interventions and a harmonised food chain information system in order to fully address the most relevant microbiological hazards to public health (not always easily detected with the current meat inspection system).

The poultry industry is highly integrated and the single Food Business Operator is able to handle all the steps of the production chain, farms, slaughterhouses and production of food. These features, allow a capillary control of each phase and the possibility to intervene rapidly and precisely both in case of emergencies in case of ordinary administration.





By this highly integrated structure a lot of data is available as basic information in the food chain information system. A well-defined and harmonised data collection system will make the poultry meat chain efficient in the EU-28 single market.

A.v.e.c. has presented its ideas and position on poultry meat inspection already to Commission officials. The control in the slaughterhouse will be through good hygiene practices and the use of HACCP systems will guide the meat inspectors. The critical points in the process that needs special attention of food business operators are at evisceration, washing the carcass in and out and during chilling.

Furthermore, a.v.e.c. advocates the use of definitions not susceptible to extensive interpretation which may impede a harmonised and consistent implementation across Europe, block further technological development while creating a concrete devaluation of products. This concerns especially the definition of MSM in Regulation 853/2004 that last already for too many years and we are waiting for a longstanding solution by the introduction of certain criteria and values related to validated tests. This is a critical point since Regulation 1169/2011 prescribes that MSM has to be labelled as such and is not included in the meat content.

Zoonosis: Salmonella and Campylobacter

The European poultry industries has achieved many major improvements over the last decades in the reduction of the prevalence of Salmonella typhimurium and Salmonella enteritidis, the two serotypes that most frequently cause disease in humans. In coordination with the European Commission and Member States, strong measures and interventions have successfully been implemented to reduce Salmonella contamination in poultry and poultry products.

Data from EFSA and ECDC show that according to the last annual report on zoonoses and food borne outbreaks 2012, Campylobacter is the most common cause of human zoonosis. It has a significant impact on food safety and public health, and poultry is considered a major source of human campylobacteriosis.

Given the success to reduce Salmonella in poultry a.v.e.c. is convinced that a harmonised approach for different zoonotic diseases is needed. Meanwhile, a.v.e.c. believes that for a successful fight against Campylobacter it is important to focus not only on the slaughterhouse, but also on the farm. Since human campylobacteriosis is more often linked to the “poultry reservoir” than to the poultry meat successful interventions on the farm will bring a more durable and sustainable solution.

Policy “from farm to fork” versus the use of chemical substances or processing aids

The EU policy to address food safety in each stage of the chain and not allowing the use of other substances than potable water in the slaughterhouse is unique in the world. It is at least as efficient and effective as the systems elsewhere that make use of substances to reduce the bacterial load on the carcass. But the European system is also more expensive and requires more investments from the industry.

A.v.e.c. supports the Commission decision to retain EU food safety standards based on the “from farm to fork” that entailed substantial investment from private businesses to guarantee food safety while

abstaining from antimicrobial treatment (AMT). Mutual equivalence principle would allow third countries’ food exports produced to different standards to be sold on the EU market. It is not acceptable that the ‘farm to fork’ policy would not apply on products entering the EU market and that apart from that European consumers have to accept the use of substances and practices not permitted in the EU.

A.v.e.c. strongly stands against the use of chemical treatments which are not accepted by consumers since for successful marketing it is essential that poultry meat complies with consumers’ demand and expectations. Moreover such intervention may not guarantee a higher level of food safety and may be critical for the safety of the food industry workers.

Furthermore you should be conscious that if pathogen reducing treatments would be accepted by the EU the poultry meat imported today may be treated too.

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FOOD QUALITY:

The European producers are complying with the highest standards in the world that comprise multiple aspects of origin, animal welfare and food safety.

The Regulation 1169/2011 on the provision of food information to consumers contains the labelling requirements for food enabling consumers to make informed choice. It introduced several changes to the existing legislation on food labelling.

A.v.e.c. will continue to closely follow the work of DG SANTE in this area and will contribute to the development of policy where it is in its member's interests.

Origin

From 1st of April 2015 poultry meat has to be labelled enabling consumers to see in which country the poultry has been reared and slaughtered. This is the first step and the next stage will be the labelling of meat used as an ingredient.

A.v.e.c. took note of the decision of the EU institutions regarding the labelling of fresh meat and supports the pragmatic approach decided by the commission.

As regards the labelling of the meat used as an ingredient, a.v.e.c. believes it is necessary to increase the awareness of EU consumers on the origin of the meat especially since the meat imported from 3rd countries is not fully compliant to the same standards as the meat produced in the EU. The EU should support better producers to provide consumers with knowledge about the differences in standards between meat from the EU and from third countries and the reason behind. This regards not only the household purchases but also the outside household consumption since a significant part of the meat imported from 3rd countries (mainly Brazil and Thailand) is mostly consumed in mass catering, food services or is used in meat preparations. Communication about the origin of the meat offered by these channels is therefore also essential.

Thus, a.v.e.c. is advocating the mandatory labelling of all products containing more than 25 % of poultry meat with the name of the country for products containing meat from animals reared both in and outside the EU.

Marketing standards

After the adoption of the Common Agricultural Policy package, the European Commission (DG AGRI) will start with the review of the connected legislation. For the poultry meat industry the review of Commission Regulation 543/2008 of 16 June 2008 laying down detailed rules for the application of Council Regulation (EC) No 1234/2007 as regards the marketing standards for poultry meat is the most important.

A.v.e.c. has already suggested modifications of the definitions, the chilling methods, the origin labelling and the requirements, registration and record keeping applicable to different types of farming. We also advocate that the future marketing standards do not obstruct the introduction of new technologies that may improve the safety and quality of poultry meat.

In particular and in the perspective of the free-trade agreement negotiations, the water content limits in the European marketing standards for poultry meat should be maintained and enforced on imports from third countries. The use of different chilling methods leads to different levels of water content permitted in the meat. Non-compliant products should be refused at the border and not being allowed to be sent for further processing or to food services. As a consequence the water content criteria should also apply for our EU exports.

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SUSTAINABLE PRODUCTION

The issue of sustainability is a topic of great interest for European citizens and a challenge for companies that consistently perform numerous investments to adapt their production systems to improve the overall environmental efficiency along the production chain.

The production of food and meat in particular, is often accused of wasting natural resources and to have a negative impact on the environment. However, recent FAO figures show that poultry sector, which accounts for 35% of global livestock production, contributes only 7% to the total livestock emissions, making poultry absolutely the most sustainable meat in the world scene. In addition emissions from conventionally indoor reared poultry are lower than from more extensive production systems as free-range or organic poultry. This should not be denied in the promotion of sustainable meat production at affordable price since the theme of sustainability is not only linked to environmental sustainability, but also to secure access to food (food security) and to economic sustainability of the sector.

The priority of the Community institutions and the food industry, looking at the constantly growing food demand, must be to ensure that access to high quality and price-affordable foods will be guaranteed to all citizens.

Processed Animal Protein (PAP)

The ban on the use of meat and bone meal for animal feeding, in force since 2001 as a preventive measure against the Transmissible / Bovine Spongiform Encephalopathy has increased the dependence of our market from third countries (Brazil, USA) with regard to protein supply (especially soybean). Despite the 2007 EFSA opinion, which certified the absence of risk in the use of meat meal for the feeding of non-ruminant animals, currently there is not a validated test that excludes the possibility of intra-species use of animal proteins, as required by the regulation on animal by-products. A.v.e.c. supports the reintroduction of the use of Processed Animal Protein and the development of a validated test as required by the regulation. The use of these products as well as less dependence from fluctuations in the market for protein sources



would also lead to a reduction of food waste, and therefore would increase further the sustainability of the sector.

International initiatives

A.v.e.c. is by its affiliation to the IPC actively participating in the LEAP program (Livestock Environmental Assessment and Performance) driven by FAO. The aim of this multi-stakeholder partnership initiative is to draft specific guidelines for each sector aimed to identify the environmental impact. These guidelines, by providing tools to identify and manage the key-factors in each sector, will allow to evaluate and, if necessary, to improve the environmental impact of each livestock sector.

European initiatives – Industrial emissions directive

The European Commission must adopt BAT conclusions containing the emission levels associated with the BAT (best available techniques) that shall serve as a reference for the drawing up of permit conditions. A.v.e.c. is in the opinion that industrial installations must use the best available techniques to achieve the optimal level of protection of the environment, under economically and technically viable conditions. A degree of flexibility is indispensable.

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ANIMAL HEALTH AND WELFARE

“Control package: Smarter rules for safer food”

Official controls

The on-going revision of the Official controls legislation specifies that national authorities should have an obligation to collect fees from all food business operators, in order to recover the costs of official controls. In the past years the poultry sector has shown that the food business operators are willing to invest in their own satisfactory checks and controls by employing on line inspectors supervised by the official inspectors. We trust this positive commitment is taken into account by the legislator while defining a more efficient and (cost) effective system. By sharing the costs of the official inspection between private and public sector both will have an incentive to organise it in an efficient way.

A.v.e.c. is in favour of a revision of the principle that only official veterinarians can carry out audits and inspections of slaughterhouses, game handling establishments and certain cutting plants (requirements of Regulation 854/2004). This requirement is considered to impose high costs as underlined by the “Study on fees or charges collected by the Member States to cover the costs occasioned by official controls” . If this requirement was to be relaxed for food business operators who are fully committed to their responsibility to bring on the market safe poultry meat according to the legal requirements, it could lead to more effective and cost-efficient controls.

Animal health

The European Parliament and Council are carrying out the definition of the animal health law (AHL) framework. In this regards, a.v.e.c. has underlined the importance of maintaining animal health scope and focus of the proposal, avoiding topics covered by other legislation to be included in the animal health legislative set. Moreover, the AHL will be the

legal framework for the monitoring of animal diseases and the use of antibiotics including its effects as antimicrobial resistance.

We are pro-actively supporting initiatives that favor quality schemes, bio-security measures, and good husbandry systems of production. We adhere to the “Best-practice framework for the use of antimicrobials in food-producing animals” published by EPRUMA. Finally proper treatment of sick animals needs to be available and permitted since it is in the interest of the welfare of the animal too.

Responsible use of veterinary drugs / veterinary medicine product (VMP)

Our approach to a prudent and responsible use of veterinary drugs is based on simple principles:

- Welcoming the initiative of the EU Commission to recast the 24-years old EU legislation that would not only favour more harmonised rules across Europe (Regulation instead of Directive) but would also allow new techniques of incorporation of the veterinary and medicinal products (VMP) meeting the required safety standards.
- Supports the “One health” strategy of the EU and initiatives aiming at reducing the use of antibiotics in livestock along the principle “as much as needed, as little as possible”.
- No antibiotics should be delivered to animals without a prescription by a veterinarian based upon his diagnosis including an antibiogram.
- All routes for oral administration of VMPs have their strengths and weaknesses and it should be up to the vet to decide which option is the most appropriate (feed, water, pills); in any case, all options should be subject to a clear, harmonised legal framework.

Animal welfare

The welfare of food producing animals depends largely on how they are managed by humans. The existing legal animal welfare requirements have no equivalent in the world and can unfortunately not all be imposed on the imported poultry meat. Moreover cost conscious consumers seem not very much willing to pay for the extra costs of the legal requirements.

The use of animal-based measures to assess animal welfare is relatively new. Legislation related to the protection of animals usually focuses on the assessment of different factors that can impact on welfare rather than on the animal’s response to these factors. Such factors may include both the resources available to the animal in its environment, for example space or bedding material or the practices used to manage the animal on the farm, such as how and when the farmer feeds the animal.

The monitoring of indicators for animal welfare needs tools that take into account the complexity of other EU regulations as regards environment and food safety and quality issues. As already advocated similar interpretation, implementation and enforcement in the 28 Member States is essential too. This should be ensured before any new legislation may be introduced and only if it may be enforced towards imports. Given the extra costs, the rules of fair competition and the limits of the spending income of consumers, the legal framework should focus more on transparent voluntary welfare schemes that enable consumers to make an informed choice and pay for it accordingly. Such voluntary schemes may serve the creation of an international stable and effective level playing field. A.v.e.c. and its members are continuously assisting the business operators to manage the welfare of poultry in the best way by management guides or guides of good practices.

Labelling of animal welfare information

Labelling of animal welfare is a complicated matter since it is a relevant issue in all different stages of the poultry chain from farm, transport and into the slaughterhouse. In each part of the chain the food business operator has to respect the welfare of the animals. We are committed to create a system by which the food business operator is able to explain to the final consumers the functioning of the system of production. Instead of physical and visible labels on the product we believe that new technologies as scanning codes on the product shall play a core role in delivering comprehensive and transparent information.

Many consumers are interested to know the farming system. For many years specific farming systems (Fed with ... % of ... Oats fed goose and or Extensive indoor (barn reared) or Free range or Traditional free range or Free-range — total freedom) are defined in marketing standards regulation, enabling consumers in a simple way to make an informed choice for products being produced under the complete set of European standards or not. We see the introduction of many other different farming schemes resulting into the marketing of poultry meat with different labels. It may be sufficient to define just general criteria that other farming schemes labels have to comply with.

Implementation of the Regulation 1099/2009 on the Protection of Animals at the Time of Killing

A particular attention has been paid by the Parliament to the complete implementation of the Regulation. Parliamentary questions have been tabled on the definition of equivalent stunning requirements applied in third countries and the assessment of the procedure of equivalence with EU standards. EFSA opinions on electrical requirements for poultry water-bath stunning show that alternative electrical water-bath stunning methods are not easily considered equivalent. In addition it is well known that the mandatory conditions for electrical water-bath stunning are creating quality problems due to blood spots in the meat. There-

fore it is important that the Commission takes an active stance towards third countries about the applied stunning of poultry. The enforcement of equivalent stunning methods used in third countries is critical and if any flexibility is granted to third countries, it should be granted to European slaughterhouses the same way.

A.v.e.c. advocates a clear definition of equivalency and a complete implementation for third countries while stressing that traceability is an essential part in the compliance to EU standards. Moreover there is a need for reconsideration of the requirements for stunning by the electrical water bath that will respect both the welfare of poultry and the quality of the poultry meat in better and more balanced way.

Protection of animals during transport

The European poultry industry is committed to ensure the welfare of animals during transport in compliance with the legislation on transport of poultry. On the basis of the provisions laid down in the EU Regulation 1/2005, a.v.e.c., with the support of other stakeholders, is developing a European poultry transport guide. This practical tool will help professionals dealing with the transport of animals to protect the welfare of the animals during transport and thus to prevent animal suffering.

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INTERNATIONAL TRADE

Safeguard of the EU production capacities

The European poultry sector has paid a strong tribute to the market opening of the European Union compared to other meat sectors with quotas granted at very low or zero tariff duty and imports amounting at more than 813 000 tons compared to imports of pork (34 900 T) and beef (306 675 T) in the EU. The study conducted by LEI Wageningen for a.v.e.c. on the competitiveness of the EU poultry meat sector www.avec-poultry.eu/communications-position-papers shows that duties are needed, even on granted import quotas, to protect the EU from third country imports.

To justify this, should be considered that the European poultry sector is the most advanced in the world as regards of animal welfare, production processes hygiene, food quality, origin labeling rules and environmental sustainability. All these characteristics are translated into a higher production cost for companies, especially when compared to major competitors worldwide such as USA, Brazil and China. Duties may be considered as a tool to create a fair level playing field, otherwise the competitive position of the EU poultry meat industry that employs more than 300 000 EU citizens will be put at risk.

Aspect to be taken into consideration in the free-trade negotiations

- **Poultry meat is sensitive product**

There should be no doubt about this since poultry meat is particularly vulnerable to competition from imports from other country suppliers as the above mentioned study conducted by LEI Wageningen learns.

- **Single pocket approach**

Despite the impasse of the current negotiations at WTO level, part of the negotiated concessions in bilateral agreements (minimum 40 %) should be compensated in the additional concessions for sensitive products in case of a multilateral agreement, otherwise the qualification “sensitive sector” would be meaningless.

- **Safeguard clause**

Trade agreements should contain a safeguard clause to protect our sector in case of a threat of serious market disturbances, especially in negotiations with important poultry producing countries or regions such as the United States, Mercosur and Thailand.

- **SPS issue in the negotiations– respect of the farm to fork approach**

Imported poultry meat from third countries not fully compliant with the EU standards of food safety and hygiene, animal health and welfare and environmental protection may undermine the credibility of the European system based upon the principles ‘prevention is better than cure’ and on the “farm to fork” approach. It is fundamentally different from the system that is focusing only on the quality in the last stage of production during and after slaughter. How will be dealt with SPS issues must be embedded in the discussion on market access in all trade agreement negotiations to avoid that apart from the trade agreement, market access be forced by a trade dispute in WTO.

- **Recognition of the single market and regionalization by the trade partners**

The EU consists of 28 Member States that form a single market. However third countries are usually refusing to recognize the internal market as one market which means that each individual Member State has to go through a time and money consuming procedure before they have access to the third country market. The EU has not such a policy, but applies regionalization. So from the SPS perspective the approval procedure for establishments is easier for third countries than in the EU.

This has to be resolved and the reciprocity principle should bring European companies in the same position as third country companies.

In case of a contagious disease outbreak the EU is applying regionalization to contain the disease as is recommended by OIE. Many third countries do not follow these OIE recommendations. For reciprocal partnership it is essential that in a trade agreement with a third country regionalization is confirmed.

- **Balanced allocation of tariff rate quota (TRQ)**

If finally TRQ's are granted, also the flexibility of the application and allocation needs to be considered. It may be preferred to allocate TRQ's to certain tariff lines instead of giving full liberty to traders, importers and exporters to decide. The allocation should be balanced between the main categories as whole carcass, cuts with bone in and boneless cuts and may take into account the market profile and the consumer preferences to match the demand. The market opening should occur gradually and a review clause should be laid down in the agreement to allow a modification of the conditions if significant disturbance is observed on the market. Regarding import rights and the system of licenses, we believe that a first come first served mechanism may not be the appropriate system since the structure of the production and trade differs usually too much between the importing and exporting country. Finally attention should also be paid to rules of origin to avoid indirect imports from neighboring third countries.

- **Monitoring of the implementation of the agreement after the signature**

An evaluation of the costs/benefits of the agreements should be performed before the end of the review clause to determine what has been the impact of the agreement on both economies. This is essential for answering the question about the future of the agreement.

Since sanitary and veterinary issues have a substantial impact on market access, the European Food and Veterinary Office (FVO), the body in charge of the inspection of the establishments both in and outside the EU is playing a very important role. An inspection report revealing deficiencies in the compliance with EU standards needs to be followed by an appropriate firm action and intervention from the European Union, to prevent the EU producers' position is undermined and the credibility of the European standards is endangered.

- **Promotion of our export interests**

A.v.e.c. is willing to work in close collaboration with the Commission to negotiate market access in third countries when we believe there is a potential for EU producers and EU industry is competitive.

According to OECD-FAO outlook, the demand for poultry meat will grow in the coming decades with an increase of 27 % of the poultry meat consumption globally, with 83 % of the increase in meat consumption coming from developing countries. This represents great market opportunities for EU producers too, despite our higher costs level.

An increasing part of the export opportunities are and will be located in countries with important Muslim communities, therefore a.v.e.c. press the Commission to invest time in the definition and negotiation of Halal standards that are broadly accepted and easily applicable.

We are convinced that the high quality of European poultry meat may perfectly match the expectations of consumers if our products will be available at an affordable and reasonable price. Since the main demand from third countries will be located in emerging countries, where the average spending income is often lower than in the EU, access to European promotion funding should not focus solely on so called "quality product" sold at a higher price to the detriment of "conventionally farmed" poultry that represents almost 100 % of the exports of European poultry meat.

Multilateral level

Institutions as FAO, OIE and Codex Alimentarius play an important role in international standard setting. However within WTO it is not accepted for all standards to be imposed on products in international trade. Especially standards that are not scientifically based or are introduced because of societal and or consumer demand cannot legally mandatory imposed.

It is important that the EU defends its right to impose similar requirements for imported products as are applied on European products. The equivalence principle should be applied in a prudent way and if it is applied the equivalent practice should be permitted for European producers too.

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