Re: Agriculture and Agri-food sectors contribution regarding the 2022 Annual Work Programme of the Promotion Policy

Dear Commissioner Wojciechowski,

The European Associations listed below would like to express their views regarding the 2022 Annual Work Programme (AWP) of the Promotion Policy that will soon be drafted.

As expressed during our meeting with you on 13th January 2021, we are extremely concerned about both the overall reduction and the imbalanced allocation of the 2021 AWP budget. Therefore, we would like to already raise your attention to some specific elements that we believe the 2022 AWP should consider to be more balanced and in line with the current market situation.

- **The 2022 budget should be at least 200 million euros.**
  In the 2021 AWP, the budget was reduced to 183 million euros which represents a cut of more than 9%. This constitutes a decrease far greater than the foreseen 4% reduction of the overall agriculture budget. Additional support for agricultural product promotion is really needed due to the consequences of the COVID-19 pandemic and Brexit. Therefore, the budget needs to be substantial.

- **There must be a balanced and proportionate allocation of the budget in line with market realities so the budget share for organic production should mimic this segment share of the market.**
  Our different sectors are fully engaged in the growth of organic agriculture. However, we fear that the Commission’s decision to dedicate 29% of the 2021 AWP exclusively to organic products, which today represent only 8% of the total EU agricultural production, creates an unfair disequilibrium.
  To secure long term viability of the organic sector, growth needs to follow consumer demand.
  Promotion opportunities should therefore be adjusted to the natural growth of the
production potential, otherwise the profitability for this agriculture segment will be seriously at risk and there could be an invasion of third country organic products. We are concerned that disproportionately focusing on a single agricultural practice could prevent the others from further contributing to EU agricultural sustainability, which would reduce the overall capacity of the Promotion Policy to increase sustainability. Another solution could be to have a budget share dedicated to sustainably produced agricultural products and another on quality schemes to which organic products could both apply together with other sustainably produced products and GIs respectively.

- **There is a need to keep the current ratio regarding the proportion of the budget allocated to Commission Own Initiatives and co-funded programmes.**
We believe that Commission Own Initiatives are very important to open markets at diplomatic level, so the proportion for co-funded programmes needs to be maintained as producers, thanks to their knowledge and experience, are the best suited to promote specific products.

In addition, we would also like to express our concerns about the ongoing revision of the Promotion Policy. Excluding some products from this policy would not only damage the competitiveness of EU agriculture, but it would also open the door to third country products with much lower environmental safety and animal welfare standards.

EU agriculture has been investing a lot over the past years to improve the sustainability of its production (more than 20% less GHG emissions since 1990, increased animal welfare, reduced use of antibiotics and pesticides) and excluding some sectors would not encourage them to go further. To avoid a sustainability leakage and support EU farmers in their environmental efforts, it is of the utmost importance to keep an inclusive promotion policy.

Consequently, we urge you to take those elements into account when drafting the 2022 AWP.

We would be pleased to meet with you (online) in the coming weeks to explain our view on this important policy.

We thank you for your attention.

Yours sincerely,

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
CIFCA - 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
FDA - European Dairy Association
EFFRAR - European Forum of Farm Animal Breeders
EUROPATAT - European Potato Trade Association
FRESHEF - European Fresh Produce Association
UNION FLEURS - International Flower Trade Association

Cc: Ms Nathalie Sanze Vandevyver, Director DG AGRI