

**From:** CLITRAVI <[REDACTED]@clitravi.eu>  
**Sent:** mercredi 2 mars 2022 12:17  
**To:** SANTE FIC REVISION  
**Cc:** [REDACTED] (SANTE); [REDACTED] (SANTE);  
[REDACTED] (SANTE); [REDACTED] (SANTE); [REDACTED] (SANTE)  
**Subject:** RE: Meeting of 2 February 2022 - Thank you!  
**Attachments:** 05Annex\_2.pdf; 05Annex\_1.pdf

Dear [REDACTED],

Dear [REDACTED],

After our chat and following our discussion, please find attached our contribution to the survey and a document which can better explain our answers.

In the meantime, we also filled the target survey proposed by the consultant.

With both the questionnaires we faced some issues mainly due to the complexity of the issue which can hardly be explained by simplified answers.

In any case, as we underlined in our document, we want to clarify a couple of principles which we believe can be helpful to better understand our position.

- **On the debate on FOPNL**, we believe that, due to the importance and the complexity of the debate, policy options should explore many different aspects. The outcomes of the Parliamentary debates showed that to achieve more balanced diets, policy options should also consider other aspects than the content of cherry – picked nutrients calculated per 100g/100 ml. The degree of processing and nutrient density on one side, as well as the need to avoid oversimplified judgments by consumers.
- **On origin labelling**, in both questionnaires, due to many oversimplified questions, we found a little bit difficult to provide meaningful information. Just to give an example, in front of a specific policy option, input prices could have a significant variation because of inflation, consequences of animal diseases, volatile transport costs, prices of commodities, etc. The variation of prices of raw material could have been different if a certain

provision would have been introduced in 2017 or in 2019. In 2017 prices of pigmeat were lower than in 2019 and, as an example, a mandatory indication of the origin of raw material at the level EU/Non-EU could have determined an increase estimated between 10% and 20% in 2017, while in 2019, with a sharp increase of prices due to high demand from China, prices could have been doubled in the EU with the introduction of a similar provision.

Similarly, the introduction of mandatory origin labelling at MS level could imply different burdens in case one country would be affected by ASF. In such a circumstance the burden of a provision requiring the indication of the country of origin, coupled with pressure from retailers and market could imply a very different range of consequences for processors.

When it comes to the real burdens in the hand of processors, it is therefore necessary to take into account the mechanism of prices adaptations from retailers. We saw in the last years that in many cases retailers did not answer in a swift way when processors and farmers were confronted with increases of prices of inputs. And, at the same time, costs derived by labelling, expiration of stocks, etc. were almost totally left on the shoulders of processors.

These are only some concrete examples to let you understand how different policy options can play a different role according to specific circumstances.

Till now our sector found very comfortable to benefit from flexible options as the one provided for by IR EU 775/2018, which can grant a certain flexibility and help to differentiate the added value of products covered by GIs.

We thank you for your attention and we are ready to provide additional concrete examples or to have an interview with the contractor if possible, so that we can better explained in detail the complexity of the issue.

Kind regards,

and



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EU Transparency Register ID: 02978802379-31

**For better information on the livestock sector, please visit the EU Livestock Voice website! <http://www.MeatTheFacts.eu>**



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**From:** [REDACTED]@ec.europa.eu <[REDACTED]@ec.europa.eu>

**Sent:** 04 February 2022 08:32

**To:** CLITRAVI <[REDACTED]@clitravi.eu>

**Cc:** [REDACTED] <[REDACTED]@ec.europa.eu>;

[@ec.europa.eu](mailto:@ec.europa.eu); <[@ec.europa.eu](mailto:@ec.europa.eu)>;

<[REDACTED]@ec.europa.eu>

**Subject:** FW: Meeting of 2 February 2022 - Thank you!

Good morning [REDACTED] and [REDACTED],

I'm [REDACTED], working in [REDACTED] unit, and I spoke Wednesday afternoon with [REDACTED].  
Thanks again for your time over the phone and the explanations provided.

As mentioned, you can register for a more detailed **targeted survey** which will further support the impact assessment for the revision of the FIC Regulation. The survey will collect views on technical aspects of the options to revise the Regulation and on the potential impacts. The survey will be launched very soon and is in addition to the ongoing open public consultation.

**To register for the survey, please use this link:**

[https://icfconsulting.qualtrics.com/jfe/form/SV\\_b8ef4rZ1GNzf9hY](https://icfconsulting.qualtrics.com/jfe/form/SV_b8ef4rZ1GNzf9hY)

If you register you will receive a personalised invitation to contribute to the specific survey as soon as it is launched.

The link to register for the targeted surveys is also available on the Commission's [FIC revision webpage](#).

Do not hesitate to contact me in case of any questions,  
Kind regards,

[REDACTED]

[REDACTED]



European Commission - Directorate-General for Health and Food Safety  
Unit E.1 - Food information and composition

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Web: [https://ec.europa.eu/food/food/labelling-and-nutrition\\_en](https://ec.europa.eu/food/food/labelling-and-nutrition_en)

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**From:** CLITRAVI <[REDACTED]@clitravi.eu>

**Sent:** Thursday, February 3, 2022 5:50 PM

**To:** [REDACTED] (SANTE) <[REDACTED]@ec.europa.eu>

**Subject:** Meeting of 2 February 2022 - Thank you!

Dear [REDACTED],

Following your phone call last night, can you be so kind to send us the link you indicated to me and which you promised us to send.

Thanks in advance.

Kind regards,

■ and ■



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**Van:** BURY Claire <■ [@ec.europa.eu](mailto:■@ec.europa.eu)>

**Verzonden:** donderdag 3 februari 2022 17:16

**Aan:** CLITRAVI ■ [@clitravi.eu](mailto:■@clitravi.eu)>

**CC:** ■ <■ [@ec.europa.eu](mailto:■@ec.europa.eu)>; ■  
<■ [@ec.europa.eu](mailto:■@ec.europa.eu)>

**Onderwerp:** RE: Meeting of 2 February 2022 - Thank you!

■ and ■,

Thanks to you for the invite.

Following your comments, I contacted yesterday colleagues dealing with the food labelling consultation – ■ now in copy- who intend to be in touch with you.

Happy to continue discussions

Best wishes  
Claire

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**From:** CLITRAVI <[REDACTED]@clitravi.eu>  
**Sent:** Thursday, February 3, 2022 5:04 PM  
**To:** BURY Claire (SANTE) <[REDACTED]@ec.europa.eu>  
**Cc:** [REDACTED] (SANTE) <[REDACTED]i@ec.europa.eu>  
**Subject:** Meeting of 2 February 2022 - Thank you!

Dear Claire,

we want to thank you very much for the constructive exchange of views on the F2F Strategy at yesterday's CLITRAVI meeting.

It was very helpful for us and our members.

Once we will have finalized our position on food labelling and we will upload on the website, we will also send you the detailed document we are working on, so that you can better understand our remark made during yesterday meeting.

We want also to thank [REDACTED] to be present too and we are available for any additional discussion on animal welfare as well as on any other topic we discussed yesterday.

Kind regards,

[REDACTED] and [REDACTED]



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