



Ms Nathalie Chaze
Director Directorate D, DG SANTE
European Commission
Ms Alexandra Nikolakopoulou
Head of Unit D1, DG SANTE
European Commission
Mr Stefano Soro
Head of Unit D3, DG GROW
European Commission

Brussels, 2nd March 2021

Re: Follow up on the 23rd February General Stakeholder meeting on the Code of Conduct, concerns regarding governance and content

Dear Ms Chaze, Dear Ms Nikolakopoulou, Dear Mr Soro,

With our joint letter of 16 February 2021 (see attachment), we shared with you our full support for the EU Green Deal ambitions of the European Commission and our first assessment of the code of conduct initiative, both from a governance and a content perspective.

It is only to a very limited extent that the 23 February 2021 plenary meeting addressed the points raised in our 16 February letter.

1) Governance

The Code of Conduct initiative is to be finalized by June 2021. This is an extremely ambitious timeframe, especially for an initiative that has ‘the potential to put food production on the good track’, as stated by an EU Commission representative.

The questions raised during the General Stakeholder meeting on 23 February 2021 regarding the number of meetings scheduled and their rhythm and the composition of the task forces were not clearly answered – and this just days before the work on this initiative is supposed to start.

Questions on the internal processes, such as the selection of the task forces Chairs and Rapporteurs or the participation or not of private companies were not clearly answered including in the roadmap sent after.

A good, exemplary governance for the Code of Conduct initiative of the European Commission is a pre-requisite for its overall success. Even in the light of the extreme time pressure imposed by the EU Commission top hierarchy, compromising governance for speed is generally ill-advised.

2) Content of the code

As pointed out in our 16 February 2021 letter, the ‘potential aspirational objectives’ of the Code are to be proposed and supported by the ‘middle of the chain actors’ (food processors, food services and retailers as we understood it), but these aspirations will have consequences at all levels of the EU agri-food chain. Such a linear conception of the food chain is inconsistent with the model of circularity that is promoted by the EU Commission as a major driver of more sustainable food systems.

The ambitions formulated by food processors and retailers will ultimately become the responsibilities of the primary producers, who are not even considered as the main focus of this initiative. Therefore, we would like to reiterate our request for the following fundamental principles to be at the heart of the Code drafting and endorsement procedure:

1. The actors – or any signatory – cannot make commitments that imply or impact other members of the food supply chain without their consent.
2. In case commitments impacting several actors are taken, the added value and cost they entail should be fairly shared among the actors involved.
3. We would like to reiterate that the aim is that all food sectors improve their sustainability. Wording that opposes sectors/steps in the chain must be avoided.

The respect of these basic principles is a prerequisite to allow the sectors we represent to fully engage in this. We believe that this constitutes the basis for a fruitful initiative that will support further EU agri-food sustainability, to which we are looking forward to contribute.

Yours sincerely,

On behalf of the following organisations:

AnimalhealthEurope - The voice of the European animal medicines industry

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

CEJA – European Council of Young Farmers

CELCAA – The 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

FEFAC - The voice of the European Compound Feed & Premix Industry

UECBV – European Livestock and Meat Trades Union

CC: Ms Manon Prado, Legal and Policy Assistant, Unit D3, DG GROW

Ms Isabelle Rollier, Policy Officer Unit D1, DG SANTE

Mr Henk Westhoek, Policy Officer Unit D1, DG SANTE

Mr Fabien Santini, Deputy Head of Unit G1, DG AGRI

Mr Matteo Barbieri, Policy Officer of Unit G1, DG AGRI