



IFA Contribution to the European Commission Inception Impact Assessment on the Revision of EU Marketing Standards for Agricultural Products

Introduction

The Irish Farmers' Association is the largest national representative organisation in Ireland, with over 72,000 members. We represent farmers across all the sectors. IFA represents farmers with Government, agri-business, and retailers. IFA is a member organisation of the EU farmer representative organisation COPA-COGECA.

IFA welcomes the opportunity to present a submission on this consultation. Generally, we welcome the Commission objectives for the revision of EU marketing standards for agricultural products. However, any alteration or revision of the standards must take into consideration the needs of the primary producer and cannot be totally consumer centric. The Farm to Fork strategy is claiming to be beneficial for farmers, however, no evidence of these supposed benefits has been detailed. Any change to marketed standards must have an economic benefit, and improve the position of the primary producer in the supply chain

The following outlines our position regarding some of the policy options as presented in the IIA document:

Proposed changes in the marketing standards must take into account the three pillars of sustainability namely economic, social and environmental. If improvements are to be made on marketing and labelling standards then it must be to emphasize the superior sustainability standards of EU produce over third country imports. In addition, if more regulation involves increased costs and reduced output for EU producers, then this must be acknowledged in the marketed standards with producers receiving an improved market price. The other stakeholders in the food supply chain must recognize that increased standards of environmental sustainability will, in general, carry increased costs which can't be borne by the primary producer.

Marketing standards should ensure a level playing field as EU producers in certain categories are undermined by third country imports produced to lower standards. This is also relevant to foods produced from primary ingredients which have been sourced outside the EU such as imported grains and protein crops which have lower sustainability and environmental standards. If EU producers continue to be denied access to new technologies such as gene editing then this difference/anomaly must be highlighted to the consumer.

Labelling which pertains to 'produced' or 'product' of a certain country must also be addressed. This is misleading to the consumer in cases where the food or produce has only been packed or processed in the particular country and not actually grown or farmed there.

Retailers are creating their own unilateral standards, particularly in relation to the cosmetic look of food rather than it's eating qualities. This is leading to high levels of on farm food waste and is creating a false image of

fresh produce in the mind of the consumer. In many cases Plant Protection Products (PPP's) are only used to improve the cosmetic look of produce e.g. potatoes, apples, rather than for yield, eating quality etc.

In this regard some of the existing standards could be realigned which might allow the reduction in the use of certain PPP's. For example, in apples, some markings are caused by *Venturia inaequalis*. Given the ongoing loss of plant protectant chemicals due to the EU review process, the existing provision for Class 1 (0.25cm² of surface area affected by scab) could now become the provision for Extra Class. The existing provision for Class 2 (1.0cm² of surface area affected by scab) should now become the provision for Class 1. A new provision for Class 2 (possibly 2.50cm² of surface area affected by scab) should be put in place. Such changes may facilitate growers to use less plant protective chemicals, and to cope with ongoing withdrawals of plant protectant chemicals.