

A REVIEW OF THE EU REGIME FOR THE FRUIT AND VEGETABLES SECTOR - PUBLIC CONSULTATION ON POLICY OPTIONS AND THEIR IMPACT ASSESSMENT

Respondent information	
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I reply on behalf of -single choice reply-(compulsory)	My company or organisation (other than public authority)
Please indicate the sector -single choice reply- (compulsory)	NGO (non-governmental organization)
Is your organisation registered in the European Commission's Register of Interest Representatives? -single choice reply-(compulsory)	Yes
Please indicate the 13-digit identification number from the Register -open reply-(compulsory)	3606882168-35
Privacy Statement	
Do you consent to the publication of your reply? -single choice reply-(compulsory)	We consent to the publication of this reply, personal data included
1. Do you view other problems or future challenges for the sector that have not been mentioned in this consultation document? -single choice reply-(optional)	Yes
Yes. If yes, which ones? -open reply-(optional)	
<p>• Although the paper mentions stagnating or decreasing consumption of fruit and vegetables, EPHAC feel that it does not adequately address the role of fruit and vegetable consumption in preventing chronic disease and improving health outcomes. Increasing fruit and vegetable consumption is one of the main strategies for preventing non-communicable diseases, in particular cardiovascular disease . • Non-communicable diseases in Europe account for 77% of the disability adjusted life years (DALYs) lost in Europe every year. Taken together cardiovascular disease, cancer and diabetes account for almost half (46%) of the disease burden and 73% of all deaths in the region . Chronic diseases, such as cardiovascular disease (CVD), cancer, diabetes and obesity, have huge social and health care costs. It is estimated that CVD alone costs the EU 192 Billion annually . • In addition to substantial social and health care costs, the increasing gap between life average life expectancy and healthy life years will have tremendous negative impacts on the productivity of the European workforce. Improving diets is an important strategy in chronic disease prevention. For example, in the UK it is estimated that 70,000 preventable deaths could be saved each year if the nation met its recommended dietary guidelines, including eating more fruit and vegetables and eating less salt, saturated fat and sugar. In 2006, it was estimated that the number of lives potentially saved annually if fruit and vegetable intake increased to 600 g/person/ day reached 892,000 and 423,000 in the EU-15 and EU-10 respectively . Currently less than half of EU member states reach the recommended daily consumption of fruit and vegetables and even in MS that reach the population target large differences in consumption between MS and socioeconomic groups persist. • It is estimated 43 million in the EU suffer from food poverty . Large differences in health outcomes exist between socioeconomic groups both within countries and between rich and poor countries. Low income groups (such as young families, elderly people and the unemployed), eat less well, pay</p>	

more for what they get in relative terms, and have worse access to healthy options . . This will be exacerbated by expected overall increases in food prices of up to 40% in the next decade . • In the UK, households in the lowest tenth of incomes were buying only 2.7 portions of fruit and vegetables a day at the end of 2010 , the latest year for which figures are available, while the average household continued to buy about four portions per person, For lower income households, that represents a 30% decline in purchases of fresh fruit and vegetables compared to 2006. • In addition, increasing fruit and vegetable consumption as part of a strategy to meet the challenges of food security and climate change mitigation is not addressed , , . A transition in dietary patterns toward more sustainable diets, including fruits and vegetables should be part of the strategy for sustainable development. Sustainable Diets are those diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources. • As part of the strategy for increasing fruit and vegetable consumption, increasing dietary diversity should also be a key feature and address the logical links between biodiversity (agro biodiversity), dietary diversity and its impact on health. This is not identified as a challenge and EU policy needs to incorporate this, especially in relation to the well-being of potentially vulnerable populations. • In addition there is a pressing need to collect, document and better use this diversity including crop wild relatives, not least because they hold the genetic secrets that enable them to resist heat, drought, floods and pests. New and better-adapted crops derived from genetic diversity can offer more nutritious and healthier foods for rural and urban consumers, and provide opportunities to generate income and contribute to sustainable rural development . • Agricultural biodiversity should play a stronger key role in the transition to more sustainable production systems, in increasing production efficiency, and in achieving sustainable intensification. Globalization, industrial agriculture, rural poverty, population pressures and urbanization have changed food production and consumption in ways that profoundly affect ecosystems and human diets, leading to an overall simplification of diets. High input industrial agriculture and long-distance transport increase the availability and affordability of refined carbohydrates and fats, leading to an overall simplification of diets and reliance on a limited number of energy-rich foods.

2. Do you view other possible options to address the challenges faced by the fruit and vegetables sector, including a specific combination of the options described in the consultation document? -single choice reply-(optional)

Yes

If yes, which ones? -open reply-(optional)

• A combination of Option 2 continuing support for producer organisations and finding new support mechanisms and ways to organize should be combined with rural development programmes targeting fruit and vegetable producers. • Support for producer organisations needs to be readdressed because it has not achieved the goal(s) originally set forth e.g. low level of organization and limited bargaining power. It is questionable whether increased concentration in the fruit and vegetable sector is the correct strategy. This strategy has worked in MS with a fewer, more concentrated POs, but has not been effective in countries with a large number of POs or lower degree of organisation. EPHAC believes that more flexibility needs to be built in to improved fruit and vegetable regime to better suit MS contexts incorporate elements from options 2b, 2c and 2d. • Support to new forms of co-operation should be stressed to create innovative solutions both in terms of creating better access to vulnerable groups, underserved areas and in building new forms of collaboration that builds value for consumers and producers. Examples of partnerships between producers and consumers, like Community Supported Agriculture (CSA) and cooperative buying schemes build on social innovation and can provide more value added for certain producer segments and contribute to goals of inclusive growth. A renewed fruit and vegetable regime should provide a variety of tools, in addition to traditional producer organisations and actions. • Fruit and vegetable producers should be eligible for direct payments on the same basis as other sectors i.e. area based payments and cross compliance. This should be based on principle of equity (not necessarily equal). • Pillar two measures should target: agri-environmental schemes that target improving the environmental performance of fruit and vegetable production and reduce dependency on inputs, programmes that seek to improve the diversity (agro-biodiversity) of production to diversity of plants and diversity of diet, innovation in food chains that reduce transportation and environmental impacts i.e. short supply chains which is one of the priorities denoted in rural development policy and increasing the accessibility to fruit and vegetables. • Drawing on the evaluation of the School Fruit Scheme, other measures or programmes that address increasing fruit and vegetable consumption should be developed. Worksite catering and day-care facilities are obvious choices. Public procurement and catering policy can be a driver for increasing consumption of fruit and vegetables and create stable demand for EU produce. • The introduction of subsidies on healthy foods should be a priority for European action. The options for use of value added tax (VAT) as an economic instrument to improve health should also be explored—such as allowing member states the possibility of levying a negative VAT rate or reduced VAT rates for healthier choices including fruits and vegetables. Governments should explore the potential for subsidies on healthy foods, which may be used in conjunction with higher taxes on unhealthy foods as implemented by several MS and being considered by a number of MS. Although EU member states are bound by EU rules on Value Added Tax (VAT), there is still considerable scope for action.

3. Do you see particular difficulties to implement any of the options suggested in the consultation document? -single choice reply-(optional)	Yes
If yes, which one? -multiple choices reply-(optional)	Option 1 (Status quo) - Option 2(A) (Further strengthening of Producer Organisations) - Option 2(B) (Support to new forms of co-operation) - Option 3 (Transfer of certain measures to rural development) - Option 4 (Total transfer to the second pillar) - The option you have suggested in reply to question 2
Please specify why : Option 1 -open reply-(optional)	
Status quo is not an option, given the challenges facing agriculture and more specifically stagnating or decreasing consumption of fruit and vegetables.	
Please specify why : Option 2 (A) -open reply-(optional)	
Further strengthening Producer Organisations must be evaluated against the goal for doing this and because of weak organisation and low uptake, might not be the best option in all MS. In MS with highly fragmented structure options 2b, 2c and 2d could provide added value.	
Please specify why : Option 2 (B) -open reply-(optional)	
Support for new forms of cooperation will require thinking beyond business as usual, and might be met with resistance from traditional agriculture actors. However, EPHAC believes that support for new forms of cooperation can run in parallel with efforts to strengthen producer organisations.	
Please specify why : Option 3 -open reply-(optional)	
As stated above transfer of certain measures to rural development mainly pertaining to existing agro-environmental schemes and priorities such as short supply chains could build synergies with the current legislative proposals for CAP2020. In addition, the European Innovation Partnership has promoting healthy diets as one of its focus areas and this should be integrated into the current review of the EU regime of for the fruit and vegetable sector.	
Please specify why : Option 4 -open reply-(optional)	
Total transfer to the second pillar is not a viable solution.	
Please specify why : The option you have suggested in reply to question 2 -open reply-(optional)	
The challenges outlined are fairly comprehensive; the options proposed do not adequately address them. Reinforcing producer organisations in our opinion will not address falling consumption and a more comprehensive set of tools needs to put in place. The options 2b, 2c and 2d could provide more flexibility for MS where the current system of POs and PGs, but more weight should be given to define new initiatives that focus on increasing consumption of fruits and vegetables and create stable demand for EU produce.	
4. Do you think a particular option is more balanced than all the others? -single choice reply-(optional)	Yes
If yes, which one? -single choice reply-(optional)	The option you have suggested in reply to question 2
Please specify why -open reply-(optional)	
We believe that the option we have suggested combining elements of 2a, 2b, 2c and 2d, transferring certain aspects to Rural development combined with elements that specifically address stagnating or falling consumption as described above.	
5. What would be the main impacts of each option? Please specify economic impacts, environmental impacts, social impacts -multiple	The option you have suggested in reply to question 2

choices reply-(optional)

Impacts of the option you have suggested in reply to question 2

-open reply-(optional)

6. Which criteria should be used to assess positive and negative impacts of different options? -open reply-(optional)

The criteria used to assess the positive and negative impact on the challenges outlined in the consultation paper. We feel that generally the challenges outlined are sufficient with the exceptions that we have provided, but the clear objectives on how these will be addressed by the options is not given. The first step should be to define clear objectives and then define which criteria should be used to assess positive and negative impacts. Because of the pivotal importance of fruit and vegetables in preventing non-communicable disease, impact on public health of the different options should be used to assess the positive and negative impacts.

7. Which actors or stakeholders would be particularly affected by each of the options in your opinion? Who would benefit most? -multiple choices reply-(optional)

In Option 1 - In the option you have suggested in reply to question 2

Actors or stakeholders - Option 1. -open reply-(optional)

All actors or stakeholders would be affected by status quo, so this is not an option in our opinion.

Actors or stakeholders - the option you have suggested in reply to question 2

-open reply-(optional)

We feel that the options we have suggested would directly benefit a wider variety of stakeholders than the options proposed. Efforts to address low consumption of fruit and vegetables will have multiple benefits for the general public and the fruit and vegetable sector. So there should be more focus on this in the impact assessment.

8. Should other elements or variables be integrated in the impact assessment of the options considered? -open reply-(optional)

Yes, a clear set of objectives should be provided based on the challenges that have been identified in the paper and other relevant challenges defined by stakeholders. We do not feel that the consultation document does this adequately. The overall level of spending should be addressed in the impact assessment. Currently total support for the fruit and vegetable sector amounts to 892 M EUR, which is low compared to other sectors and total CAP expenditure. Given the strategic importance of the FV sector both in economic terms and in terms the potential saving that can be achieved by increasing fruit and vegetable consumption, adequate investment in the fruit and vegetable sector is paramount.