

Mr Frans Timmermans
Executive Vice-President
for the European Green Deal
European Commission
Rue de la Loi 200
1049 Brussels

Brussels, 13th October 2020

Dear Executive Vice-President,

We are writing to you on behalf of the 22 million European farmers and their families and 22,000 agri-cooperatives and the upstream and downstream agri-food chain operators that carry out their activities to provide 446 million EU citizens with sufficient, safe, nutritious, high-quality and affordable food every day.

Despite the COVID-19 pandemic, we have been able to maintain supply, thus ensuring food security for our fellow citizens. However, we are facing difficult market situations and financial pressure arising from the COVID-19 pandemic across the EU. These are causing rapid and negative knock-on effects on many agricultural and food sectors, both, in the medium and long term. Furthermore, this mounting crisis potentially puts both the single market and international markets at stake, threatening supply chains, jobs and ultimately EU food security.

We fully support a transition to more sustainable production and consumption. In this context, we welcome the publication of the Farm to Fork and the Biodiversity Strategies and we support the overall ambition of the European Green Deal and Paris climate agreement.

European agri-food chain operators are already working together to encourage the development and implementation of “win-win” more sustainable agricultural and food production practices. To meet the EU sustainability ambitions (economically, environmentally and socially), the agri-food sector needs to work in a consistent and coherent policy environment. This requires fact and science-based, holistic and predictable policies that balance out trade-offs while leaving no one behind in the food supply chain, especially when considering the recovery from the COVID-19 pandemic.

To this purpose, we urge the European Commission to carry out a comprehensive ex-ante impact assessment of the cumulative impacts of the various targets for EU agriculture set out in the Farm to Fork and the Biodiversity Strategies before taking any political or regulatory decision. This impact assessment should consider costs and benefit for the environment, public health, the impact on EU food security and food safety as well as available resources and possible innovative alternatives. This is particularly relevant for the reduction on the use of inputs such as plant protection products, fertilisers or antibiotics and restrictions on the use of land and forests arising from actions linked to the nature protection and restoration and the improvement of animal welfare. These targets should not only be coherent and consistent across the European Green Deal initiatives, but also realistic and achievable. They should be based on the latest economic, scientific and technological developments, to enable the agri-food chain to deliver on a long-term basis food security whilst ensuring farming income, generational renewal and competitiveness to the sector and preserving ecosystems.






As shown by research, in the absence of viable alternatives, such targets could have significant economic, social and environmental impacts on the quantity, quality, safety and affordability of EU agricultural and food products. At the same time, climate change, biodiversity loss, soil

degradation, water pollution and other environmental challenges we face today also threaten food security and safety.¹

A structured dialogue between the European Commission, Member States and agri-food chain actors is also needed to identify and address cross-cutting challenges, trade-offs and viable managerial and technological alternatives.

We remain at your disposal to provide you and your services with any additional information on the concerns that we have and to collaborate further in the implementation of the Farm to Fork and the Biodiversity Strategies.

Yours faithfully,

			
 Copa	 Cogeca	 CEJA	 FEFAC
			
 ECPA	 AnimalheathEurope	 EFFAB	 FEFANA
			
 CEMA	 Euroseeds	 Fertilizers Europe	 CELCAA

¹ Non exhaustive list.

- 2019 EEA report [Climate change adaptation in the agricultural sector in Europe](#)
- 2019 European Commission report [EU agricultural outlook](#)
- 2019 European Commission brief [Organic farming in the EU](#)
- 2019 STOA report [Farming without Plant Protection Products](#)
- 2020 JRC report [Analysis of climate change impacts on EU agriculture by 2050](#)
- 2020 study [Low Yield II Cumulative impact of hazard-based legislation on crop protection products in Europe](#)



[Animal Health Europe](#) represents 12 of Europe's leading manufacturers of animal medicines and 17 national associations in 19 countries, covering 90% of the European Market. The animal health industry provides tools for veterinarians to care for around 700 million animals in Europe, supporting 5.7 million livestock farms and 85 million pet-owning households across Europe.



[CEJA](#) represents the political interests of around two million young farmers from across Europe. Its main objectives are to facilitate the installation of young farmers, to inform and to train them as well as act as a forum for communication and dialogue between them.



[CELCAA](#), the European Liaison Committee for Agricultural and Agri-Food Trade, is the umbrella organisation representing at European level associations and companies active in the sector of agricultural and agri-food trading. Its full and affiliated members include cooperative and non-cooperative wholesale traders (collectors, distributors, storers, importers and exporters) delivering agricultural and agri-food products as feed materials to farmers and compound feed industry, as well as raw material to food industry, as food and drink to retailers (meat and eggs, fresh produce and wine). On retail level CELCAA represents the Butcher Crafts sector.



[CEMA \(www.cema-agri.org\)](http://www.cema-agri.org) aisbl is the association representing the European agricultural machinery industry. With 11 national member associations, the CEMA network represents both large multinational companies and numerous SMEs active in this sector. The industry comprises about 7,000 manufacturers, producing more than 450 different types of machines with an annual turnover of about €40 billion (EU28 – 2016) and 150,000 direct employees. CEMA companies produce a large range of machines that cover any activity in the field from seeding to harvesting, as well as equipment for livestock management.



[Copa and Cogeca](#) are the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 22 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives.



[ECPA](#) represents the crop protection industry in Europe. Our members develop innovative and science-based solutions such as pesticides and biopesticides that keep crops healthy and contribute to provide Europeans a safe, affordable, healthy, and sustainable food supply.



[EFFAB](#) is an independent forum representing farm animal reproduction and breeding organisations in EU. Our membership includes ruminants, pigs, poultry and aquaculture. EFFAB commitments include the promotion of responsible and sustainable animal breeding through the [Code EFABAR](#), the Code of good practices for EFFAB members.



[Euroseeds](#) is the voice of the European seed sector. We therefore represent the interests of those active in research, breeding, production and marketing of seeds of agricultural, horticultural and ornamental plant species. Euroseeds, with more than 34 national member associations from EU Member States and beyond, represents several thousand seed businesses, as well 67 direct company members, including from seed related industries.



[FEFAC](#), the European Compound Feed Manufacturers' Federation, represents 23 national Associations in 23 EU Member States, the UK, as well as Associations in Switzerland, Turkey, Serbia, Russia and Norway with observer/associate member status. The European compound feed industry employs over 100,000 persons on app. 3,500 production sites often in rural areas, which offer few employment opportunities.



[FEFANA](#), the EU Association of Specialty Feed Ingredients and their Mixtures, is the united voice of the specialty feed ingredients business in Europe. Our membership comprises manufacturers and traders of feed additives, functional feed ingredients, premixes and other mixtures of specialty ingredients that enter the food chain via feed. FEFANA facilitates the dialogue between EU institutions and feed business operators while promoting feed and food safety and a fair and competitive market.



[Fertilizers Europe](#) represents the majority of fertilizer producers in Europe and is recognized as the dedicated industry source of information on mineral fertilizers.