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ANNEX E(1) : INTER-SERVICE AD-HOC GROUP

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- 20 November 2008 – inter-service group meeting
- 22 January 2009 – Inter-service steering group meeting
- 18 February 2009 – Inter-service steering group meeting
- 27 February 2009 – Inter-service steering group meeting

**ANNEX E(2): REPORT ON THE STAKEHOLDER HEARING 11-12/05/2006,DG JRC/IPTS
30/11/2006**

[see pdf file]

ANNEX E(3): CONFERENCE CONCLUSIONS, 'FOOD QUALITY CERTIFICATION: ADDING VALUE TO FARM PRODUCE', 5-6.2.2006,

[see pdf file]

ANNEX E(4): RESULTATS DE L'ENQUETE AOP-IGP-STG 2007

1. INTRODUCTION

Organisée en 2007, l'enquête AOP-IGP proposait d'évaluer auprès des groupements et des producteurs les effets socio-économiques engendrés par l'enregistrement d'une dénomination. La participation était volontaire.

Résumé:

- Cinq pays représentent 86.8 % des réponses : Italie, Grèce, Portugal, Espagne et France, réparties sur les huiles et matières grasses, produits à base de viande, fromages, fruits et légumes et viande frais.
- Les coûts liés à l'enregistrement sont divisés en trois catégories : l'adaptation au cahier des charges, contrôles et inspections et marketing.
- Les deux tiers des participants à l'enquête confirment les effets économiques positifs de l'enregistrement sur leurs résultats; or, les producteurs considèrent que la valeur ajoutée induite par l'enregistrement bénéficie davantage aux grossistes et à la grande distribution qu'aux producteurs; cela varie néanmoins selon la catégorie de produit.
- Les deux tiers des participants indiquent qu'ils utilisent le logo
- Les problèmes signalés concernent la reconnaissance des AOP/IGP par les consommateurs, des difficultés dans l'approvisionnement en matières premières conformes aux cahiers des charges en raison des délimitations géographiques, la multiplication des normes au niveau communautaire et national et l'insuffisance des contrôles.
- Les propositions visent une assistance communautaire au niveau de la communication, une clarification des règles concernant l'utilisation d'un produit enregistré comme ingrédient, un champ élargi de la protection assurée par l'enregistrement, une assistance technique aux groupements qui souhaitent obtenir un enregistrement ainsi que la création dans les E-M d'organismes chargés de contrôler le respect des enregistrements

2. LE PROFIL DES PARTICIPANTS

- (1) 143 réponses ont été enregistrées lors de l'enquête en ligne ce qui correspond à 134 dénominations différentes. En effet, plusieurs participants pour une même dénomination ont été enregistrés (notamment pour deux huiles d'olives italiennes).
 - 88% des participants sont des groupements de producteurs ; les groupements sont de taille très variables : de quelques producteurs plusieurs milliers (d7¹).
 - Seuls 17 producteurs indépendants ont répondu au questionnaire en ligne, notamment en matière de productions d'huile d'olives (d7).
- (2) Les participants sont originaires de 13 pays différents mais 5 pays se distinguent par un taux important de réponses : Italie, Grèce, Portugal, Espagne et France (d4).
- (3) Les réponses ont été principalement enregistrées dans 5 catégories de produits : les huiles d'olives et matières grasses, les produits de la viande, les fromages, les fruits et légumes, et la viande fraîche (d5).

¹ Cette indication entre parenthèses renvoie au numéro de la diapositive correspondante dans la présentation globale (PowerPoint).

- (4) Certaines dénominations enregistrées emploient plus de 10 000 personnes (Max: 30 000) de manière directe ou indirecte : la réglementation relative aux AOP-IGP représente donc un enjeu essentiel (d13).

3. LES PRINCIPAUX RESULTATS

- (1) L'enregistrement a conduit dans près de 60% des cas à une hausse de la production (d10). En revanche, cette hausse de la production ne s'est pas entièrement traduite par un accroissement du nombre de producteurs : seulement 43% des groupements et des producteurs indépendants ont constaté une augmentation du nombre de producteurs (d11).
- (2) Un tiers des participants à l'enquête constate une augmentation de l'emploi après l'enregistrement (d13).
- (3) En matière de vente, l'impact de l'enregistrement est très net, ce qui témoigne d'une amélioration de l'identification du produit et de sa reconnaissance :
- d'une part, il permet d'accéder à de nouveaux débouchés : les supermarchés, les magasins d'alimentation et les restaurants (d15) ;
 - d'autre part, il permet d'élargir son marché : au niveau national et au niveau communautaire (d16) ; près d'un tiers des participants ont ainsi déclaré que leurs clients appartenaient désormais au marché national et non plus au marché régional (d16).
- (4) L'enregistrement engendre parfois de nouveaux coûts (d105) notamment liés aux exigences imposées par le cahier des charges.
- 40% des participants ont observé une augmentation du prix de vente supérieur à l'inflation (d19) qui est principalement expliquée par l'enregistrement (d21). L'enregistrement est le signe d'un savoir-faire et d'une valeur ajoutée qui distingue les produits enregistrés de leur substitut et justifie un prix supérieur sur le marché (d22).
 - Toutefois, 45% des participants ont vu le prix de leur produit évoluer au même rythme que l'inflation (d19) ; l'évolution du prix s'explique alors essentiellement par des raisons indépendantes de l'enregistrement (d21).
 - Il faut noter que l'augmentation des prix semble avoir été plus importante chez les distributeurs que chez les grossistes, probablement au détriment des producteurs (d21).
- (5) Les effets sur la région de production du produit enregistré sont plus nuancés au niveau global (d25 et d26) ; ils varient en fonction du produit et du pays (en raison d'une forte concentration des réponses). Cependant, il est possible de relever :
- L'impact globalement positif sur les revenus, l'emploi, le tourisme, l'implantation de nouvelles infrastructures et le soutien au développement rural ;
 - L'impact nul en matière de croissance démographique ou sur les paysages. Toutefois, les producteurs d'huiles d'olives et de matières grasses (d54) font état d'un impact positif sur les paysages.

4. ÉVALUATION DES COÛTS DE LA PROCEDURE D'ENREGISTREMENT

- (1) Les réponses sont partagées en matière d'évaluation du coût de la procédure d'enregistrement : une faible majorité des participants à l'enquête évoque un coût d'enregistrement (d28), mais les deux tiers indiquent un surcroît de travail administratif (d31). En reprenant les questions de l'enquête, il est possible d'identifier trois grandes catégories de coûts.

- (2) Les coûts liés à l'adaptation aux normes du cahier des charges :
- 25% des participants évoquent la nécessité de procéder à des investissements : les montants indiqués sont d'ampleur très variés de quelques centaines d'euros à plusieurs millions d'euros² (d28) ;
 - 25% des participants relèvent le coût engendré par l'achat d'ingrédients conformes aux cahiers des charges, notamment en raison de la région de production (d29) : l'enregistrement impose en effet une rigueur supplémentaire dans l'approvisionnement.
- (3) Les coûts liés aux contrôles et aux inspections (d30) : près de 50% des participants les mentionnent ; leurs montants dépendent du type de produits.
- (4) Les coûts liés au marketing : près également de 50% des producteurs ont dû faire face à des coûts pour renouveler leurs étiquettes et assurer la promotion de la dénomination. Quatre sources principales de financement sont indifférenciables : les fonds communautaires, l'Etat, les collectivités territoriales et les groupements privés. Beaucoup de groupements de producteurs ont organisé une campagne de promotion après l'enregistrement : elles mobilisent parfois des moyens financiers conséquents (>100 000 euros) sur plusieurs années.

5. ÉVALUATION DES EFFETS ECONOMIQUES

- (1) Les deux tiers des participants confirment les effets économiques positifs de l'enregistrement sur leurs résultats (d34).
- (2) En revanche, les producteurs considèrent que la valeur ajoutée induite par l'enregistrement bénéficie davantage aux grossistes et à la grande distribution qu'aux producteurs (d35).
- En matière d'huiles d'olives et de matières grasses, le partage apparaît plus équilibré (d50) ; il peut s'expliquer par le plus grand nombre de réponses issus de producteurs indépendants.
 - En matière de fromages comme de produits de la viande, les producteurs considèrent que c'est la grande distribution qui profite le plus de la valeur ajoutée (d63 et d75).

6. UTILISATION DU LOGO

- (1) Les deux tiers des participants indiquent qu'ils utilisent le logo communautaire (d37).
- (2) 49% des participants indiquent faire face à des utilisations ou des évocations illégales de leur dénomination (d39).

7. PROBLEMES ET PROPOSITIONS DES PRODUCTEURS

A la fin de l'enquête, les participants pouvaient expliciter leurs problèmes spécifiques ainsi que faire part de leurs propositions.

7.1. Problèmes (d105, d106) :

- Reconnaissance des AOP/IGP par les consommateurs et les pays tiers ;

² Il convient de considérer avec prudence cette évaluation dont la formulation dans la réponse est ambiguë : il n'est pas évident de savoir si ce montant correspond aux investissements nouveaux ou aux coûts fixes pour un producteur qui voudrait s'installer et produire conformément aux cahiers des charges.

- Procédure :
 - o Critique de l'art. 5 du Règlement (CE) n°510/2006 sur l'organisme pouvant introduire une demande d'enregistrement ;
- Mise en œuvre :
 - o Difficulté dans l'approvisionnement en matières premières conformes aux cahiers des charges en raison des délimitations géographiques ;
 - o Multiplication des normes au niveau communautaire et national ;
 - o Absence/manque de concurrence entre des produits qui semblent indifférenciés et interchangeables ; pression à la baisse des prix ;
 - o Critique du partage de la valeur ajoutée qui malgré l'augmentation des coûts bénéficie parfois essentiellement à la grande distribution.
- Contrôle
 - o Insuffisance des contrôles sur le marché communautaire ;
 - o Inexistence des contrôles dans les pays tiers.

7.2. Propositions (d107, d108) :

- Communication
 - o Améliorer/faciliter l'accession au soutien financier pour assurer la promotion du système AOP/IGP auprès des consommateurs ;
 - o Mener une campagne de communication au niveau communautaire et à destination des pays tiers.
- Règlementation
 - o Clarifier les règles relatives à l'utilisation d'un produit enregistré comme ingrédients ;
 - o Définir des conditions plus stricts d'enregistrement en intégrant notamment des critères environnementaux ;
 - o Élargir le champ de la protection assurée par l'enregistrement aux savoir-faires afin de tendre vers des brevets industriels ;
 - o Etendre au niveau mondial la réglementation relative aux AOP/IGP.
- Procédures
 - o Assurer une assistance technique aux groupements qui souhaitent obtenir un enregistrement.
- Contrôle :
 - o Créer dans les États membres des organismes chargés de contrôler le respect des enregistrements.

ANNEX E(5): INDICATIVE LIST OF EVENTS RELATED TO THE GREEN PAPER CONSULTATION

Presentations in Advisory groups:

Advisory Group on Hops: 23/10/2008

Advisory group on olive oil: 10/11/2008

Advisory Group on Fruit and vegetables: 12/11/2008

Expert group on marketing standards: 24/11/2008 + 16/03/2009

Advisory Group on Milk: 01/12/2008

Advisory Group on Simplification: 12/12/2008

Advisory group on Spirits: 27/02/2009

Participation in events

In order to inform stakeholders and to encourage them to contribute to the Green Paper, DG AGRI representatives participated in a number of events in Member States. This offered as well the opportunity to inform stakeholders and the general public about the follow-up of the Green paper and the Impact Assessment exercise.

- **12 November 2008:** Meeting organised by the European Commission delegation in Berlin and the Netzwerk Europäische Bewegung Deutschland. The Green Paper on "Agricultural Product Quality" was presented to 40 participants covering the whole range of producers, labourers, consumers, interest groups, policy makers and public authorities.
- **17 November 2008:** Seminar on the protection of designations of food products organised in Brussels by the Italian Institute for Foreign Trade. The Green Paper on "Agricultural Product Quality" was presented by Daniele Bianchi (member of Cabinet Agriculture Commissioner Mariann Fischer Boel). A discussion followed the presentation.
- **18 November 2008:** Informal seminar organised by the German Dairy Association, the permanent representation of North Rhine-Westphalia and the German Central Marketing Association (CMA) in Brussels. The Green Paper on "Agricultural Product Quality" was presented to around 20 participants representing various sectors of German agriculture and food production.
- **2 December 2008:** Conference on the Green paper on "Agricultural Product Quality" with the participation of Agriculture Commissioner Mariann Fischer Boel organised in Brussels by AREPO (Association des Régions européennes des produits d'origine).
- **3 December 2008:** Round table on the future of geographical indications in the European Union organised by Maria Petre (MEP), OriGIn (Organisation for an International Geographical Indications Network) and CNAOC (Confédération Nationale des Appellations d'Origine Contrôlée). The Green Paper on "Agricultural Product Quality" was presented by Daniele Bianchi (member of Cabinet Agriculture Commissioner Mariann Fischer Boel).

- **6 February 2009:** Séminaire "Produits agricoles et agroalimentaires de montagne: un nouveau cadre de référence européen, pour quels marchés?" organised in Lyon by ISARA-Lyon. A presentation of the Green paper was made and was followed by a discussion concentrating on "mountain products".
- **24 February 2009:** Salon international de l'Agriculture à Paris. Participation of DG AGRI officials to the "Quality Day" devoted to the future of agricultural product quality policy. A presentation on quality policy and Green Paper was made.

Feedbacks obtained during those events have been important to feed the Impact Assessment process and the conclusions of this report.

Opinions expressed during the consultation on the Green Paper on agricultural product quality

Disclaimer: this Commission working document does not represent the view of the Commission. It was intended to detail opinions expressed by respondents to the consultation on the Green Paper on agricultural quality policy. It supported Commission services when drafting the Impact Assessment prior to the Communication on agricultural product quality policy.

A summary of those opinions as well as a presentation of the methodology and statistical data was presented in the Conference organised by the Czech Presidency on 12 and 13 March 2009 in Prague and is available on-line: http://ec.europa.eu/agriculture/quality/policy/consultation/contributions/summary_en.pdf

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1. THE OPINIONS RECEIVED

1.1. Question 1

How could the requirements and standards met by farmers that go beyond product hygiene and safety be made better known?

The overwhelming majority of respondents suggested publicly-funded promotion campaigns and a variety of media methods to get the message across, such as new bar-code technology to convey information about a food. Farmers and retailers should participate.

Most respondents said the message should concentrate on the positive input of farmers in meeting requirements. However, some also wanted there to be a focus on requirements not followed (allegedly) in third countries.

Most **authorities** wished to see publicity campaigns for consumers financed by the EU, in which farmers organisations participate. Communication messages should be easy for consumers to understand. One suggested involving retailers in awareness-raising and training about the origin of food. One authority considered that sufficient information was already available and another that the EU model was already strongly supported by citizens.

Awareness-raising campaigns, which should be non-discriminatory for trade, were also mentioned by a third country organisation.

Most **local authorities** recommended an information campaign, underlining the EU requirements followed by farmers that do not exist elsewhere. Other recommendations included: using labelling and information at point of sale to close the information gap between producer and consumer ; and taking steps to improve consumer confidence.

Most **farming organisations** asked for a greater communication effort to consumers, using modern methods of communication and undertaken by EU or Member State authorities. The European model of farming should be highlighted. One said controls were more effective with smaller enterprises. Several thought that farmers should be encouraged to farm in a more sustainable way and reward achievement.

Many farming organisations argued for more communication and labelling on production standards or promoting EU quality standards and origin of production. One group said the EU logos should be distinguished from each other and made compulsory for participants. On farm group said meeting baseline standards is not enough as consumers already expect this ; another said consumers were already sufficiently aware. Another said this should be done at national level as safety and hygiene standards are different in different Member States. EU farmers followed higher hygiene and safety standards than in 3rd countries, which added costs that were not imposed on 3rd country producers. The concept of "l'agriculture paysanne", built on sustainability and support for rural society, should be developed and defended, including for farmers in developing countries. One organization suggested using new technologies to allow consumers to be able to trace product from packaging codes to its origin.

Individual farmers said improving communication between the producer and consumer so the consumer receives relevant information when shopping. Promotion and information campaigns, seminars and brochures etc. should be used to get the message across.

According to **processors**, promotion funding is needed at EU level, possibly focused on PDO-PGI. Labelling that makes clear EU standards have been met could be useful. State aids for promotions should be limited. EU-funded campaigns could be useful to make consumers aware of EU requirements, but some argued that promotion of adhering to EU standards should be left to the market as a selling point. Use voluntary labelling to better inform consumers about production standards.

Retailers argued for communication campaigns by authorities and farming groups should be used

One respondent suggested that TV commercials should be used

Consumers and members of the public suggested using better labelling and point of sale information as well as media sources. One suggested it could be focused on issues such as non-GMOs and absence of pesticide traces. Development of more EU

labelling schemes was proposed, such as for climate change and animal welfare. Using symbols and logos and inform consumers. But first EU rules need to be harmonised. Certification schemes should be developed with independent controls. Promotion campaigns should be used

Consumers and members of the general public argued for development of a communication campaign and development of a symbol showing EU provenance. Better information or education to consumers should be undertaken, underlining the attributes of different origins, for example. Clear and easy to understand quality schemes at national level could be set up.

NGOs said the EU should demand same standards of hygiene, environmental compliance etc from 3rd countries as from EU and promote raising of standards to EU levels at international level.

Most **'other' organisations** recommended an information campaign, underlining the high EU requirements followed by farmers and benefits of modern techniques or explaining what standards really mean (e.g. in animal welfare area). Publicity for PDO-PGI was recommended. One organisation recommended limiting publicity to farming systems that contribute positively to the environment (soil, water, biodiversity and climate) and/or animal welfare. Some organisations were concerned that EU requirements are not high enough to justify specific promotion. Other recommendations included: clarifying who is responsible for quality (producers, not authorities), and allowing the private sector to make the publicity through branding or through specific schemes that connect farmers with consumers.

What would be the advantages and disadvantages of developing new EU schemes with one or several symbols or logos indicating compliance with EU farming requirements, other than those related to hygiene and safety? Should a non-EU product which complies with EU production requirements be also eligible to use such an EU quality scheme?

The vast majority of respondents in all sectors opposed the creation of an EU logo to signal compliance with EU requirements.

Arguments given were that it would confuse consumers who would think that the logo indicated a positive attribute beyond the baseline, costs of control and paperwork, feasibility of developing a scheme.

Most **authorities** said the risks were the creation of confusion ; increasing costs and paperwork and prices ; increasing the crowded nature of labels ; overloading information for little meaning.

Advantages: guarantee respect for EU standards ; consumers will have more information and be reassured ; there may be a small benefit in terms of clarity if EU logo can replace many others. However one authority argued that specific labelling must be linked to additional effort. Concerning use by a non-EU country: one opposed ; and one supported. Better to concentrate on publicity campaigns and existing PDO-PGI schemes

A **third country** body advised against the proliferation of logos

Local public authorities recommend informative labelling covering, e.g. origin of raw materials, place of transformation. Combining origin and conformity with EU requirements could create confusion. A logo for respect of EU requirements should be clear and non-confusing; existing logos should be better promoted. Controls by public authorities would be burdensome and could be done also by operators.

Most **farmer representatives** opposed a new EU logo scheme, arguing it would add nothing to official controls and cause confusion for consumers concerning origin (e.g. 'CE' mark on toys made in China) ; add costs and burdens. Higher level standards than the minimum, such as integrated production, should be promoted. A few respondents favoured the logo arguing that 3rd country exporters follow lower standards, provided the logo is promoted with an information campaign, but the logo should be limited to EU producers

Most farming bodies (unregistered) opposed the logo as it would increase costs, not give added value and confuse consumers. A few respondents did not object to an EU-requirements logo and one, in a sector described as 'vulnerable' to imports, strongly supported identification of product that meets EU requirements. A few said, if adopted, it must be open to 3rd country producers, although a few respondents argued for a different logo (or no logo) for produce of 3rd countries. A few respondents said EU requirements should be promoted in 3rd countries, or EU value-adding schemes like integrated production, promoted, also in 3rd countries. One respondent wanted further study before a new logo was considered.

Most **individual farmers** opposed the concept of a logo signalling compliance with EU requirements,

since consumers would not appreciate it and expected certification logos to represent tougher conditions. Some supported an EU-requirements logo

A **trade** organisation said that a logo showing compliance with EU rules makes no sense

Bodies opposed a new logo for compliance with EU requirements. One said non-confirming growers will continue to sell more cheaply without the logo

One processor respondent did not oppose, but most **processors** (registered) did not want to see an EU requirements logo as it would not have meaning and there was very little commercial interest, costs and inspections would increase and use of the EU requirements logo on (complying) 3rd country import would confuse consumers.

Most processors did not support a new logo scheme as it would not have any meaning for consumers and be difficult to implement. One respondent said that sectors where there are not significant imports should not have the EU logo applied.

A **retailer** said they were not persuaded that a new EU logo is needed. It should be analysed from the perspective of adding a Community dimension, e.g. functioning of the single market; utility to consumers and economic operators; visibility and controls burden. One retailer favoured an EU requirements logo, while one other did not: preferring an added-value logo, such as organic, integrated production or HNV farming product

Most **consumer groups** opposed creation of a new EU logo as it would cover too many types of different product. One group thought the EU logo would be a good solution.

Several **consumers/general public** favoured an EU requirements logo as this would encourage international compliance with, and awareness of, EU requirements such as animal welfare. Some consumers opposed on the ground of an overload of information. Others opposed, citing potential consumer confusion and preferring a national logo or were concerned it would have no real meaning for consumers

Academic bodies in favour of the logo said it would enhance trust in product labelled in conformity with EU requirements (398); Those against said it would have no meaning for consumer; controls costly and burdensome; standard comparison will be difficult, create confusion ; not reflect consumer demand, open to 3rd country producers

NGOs opposed the logo, as this would not carry any significant meaning for consumers; another body was in favour, as it would increase transparency but the cost of compliance would have to be taken into account. One NGO said if EU logo is proposed, it must be open to developing country exports

Most '**others**' opposed a new EU logo scheme. Problems include: logo would be misinterpreted to indicate higher quality not baseline; consumers will not trust the logo; baseline levels of regulation need to be updated frequently; public safety and hygiene standards fixed by law and controlled by public authorities are a sufficient guarantee for consumers; costs of control and bureaucracy; cause confusion; minimum standards in animal welfare are not high enough to be promoted. One said the EU should continue to promote EU standards in 3rd countries. The cereals sector relies on private quality assurance. If the logo is implemented it should be open to 3rd country producers also, but this would be difficult. A few respondents supported the EU logo idea which should cover environment, social welfare, ecology and animal welfare, and would help distinguish products that do not meet EU requirements.

What would be the advantages and disadvantages of having an obligatory indication of the place of production of primary products (EU/Non EU)?

Most national authorities, regional authorities, producers and consumer groups supported the indication of the place of farming. About half thought 'country' labeling would be better than 'EU' and a minority insisted that only country or region would suffice.

Processors opposed almost unanimously, citing the difficulties of traceability and costs. They also claimed the consumer was not interested in origin of raw materials for processed foods.

A number of producers and other organisations recognized that for some sectors and for some processed products, place-of-farming labelling would be very difficult to implement. They recommended a product-sectoral approach. Several asked for meat to be compulsorily labelled for origin as soon as possible.

Most **national authorities** support indication of EU/non-EU place of farming., but some say it should be the country (or region) name given. It should not be confused with PDO-PGI. However,

place-of-farming labelling could increase costs. Some argue for voluntary labelling of place of farming on the ground that only if there is strong support for such labelling from producers, will it work. One argued for a sector-by-sector approach and general rules should be dealt with as proposed in the Labelling Regulation proposal. One opposed obligatory labelling of place of farming.

Any labelling scheme should be non-discriminatory.

Most **regional authorities** support indication of EU/non-EU place of farming as a benefit to the consumer and local producers, but it may increase costs for processing industry; some argue for a sector-by-sector approach. Some insist that country labelling should be used in preference to EU/non-EU. Some oppose or think it will not have much impact or be problematic for some products (such as salt)

Producer bodies are mainly in favour of place-of-farming labelling, which will assist transparency in the market ; some argue for a case-by-case approach, as country of origin labelling is already applied for fruit and vegetables, but should be applied to all meats especially lamb. Place-of-farming labelling will, however, increase costs and is not realistic for all processed products.

Farm groups were in favour of place-of-farming labelling, e.g. the EU flag, in particular to help consumers and favour rural development and facilitate 'local' production with environmental benefits. Some said it would only have meaning for consumer at country level (not 'EU'). Place-of-farming labelling could be problematic for processors and could impose costs and lead to harm in the event of a food scare. A few opposed obligatory place-of-farming labelling.

"EU' place of farming labelling was supported by most respondents and would assist consumers, e.g. in assessing how far food has travelled, and bolster confidence. However, there is a risk in the event of a food scare that origin labelling will hurt other producers. For livestock products the origin of feed should be noted as well.

EU/non-EU' place of farming logo would be efficient to indicate EU standards, but also risky in case of disease outbreak.

Two **trade** respondents opposed EU/non-EU place of farming labelling as imposing unnecessary costs and adding burdens for small agricultural holdings

Processors in general opposed obligatory EU/non-EU place of farming labelling, which would be

difficult for processing industry since they need multiple sourcing to maintain quality of raw materials throughout the year input to processes. One processor asked for compulsory origin labelling to be avoided for beef (repeal existing) and other meats and especially for preparations of meat products. One argued that all reference to origin risked distorting the rules of competition. Re-labelling and difficulties of multiple sourcing must be taken into account. One said consumers do not appreciate EU/place of farming (but might be interested by 'country'). One processor organization said consumers were interested in such labelling and inferring additional quality attributes from the place of farming. A few processors were in favour on ground that it would increase consumer information and be a source of information for consumers.

A retailer said EU/non-EU place of farming labelling would let consumers know whether the product came from the EU. This retailer prefers EU/non-EU to country.

A **retail** body said that EU/non-EU labelling could be useful for raw agricultural products of lightly processed (fruit and vegetables, meat, poultry..), but not for processed products since the raw materials are not the decisive factor in the purchase. A second retailer also supported EU/non-EU.

Four **consumer groups** that responded supported EU/non-EU place of farming labelling in particular on processed product. One preferred country origin and another argued that consumers could more easily choose 'local' products.

Most **individuals** who responded supported obligatory place of farming labelling (EU/non-EU) as a distinct advantage to consumers and to assist traceability. Some said the level must be 'country' and not 'EU', but one insisted on EU level to avoid damaging the single market. Some difficulties are also foreseen, such as legibility of labels

Academic observers said EU/non-EU place of farming could be interesting for consumers, to distinguish local food (food-miles) and justify price differences, and exercise their right of choice. Several said the country name should be used.. Place of farming labelling could cause problems for processors

One **NGO** argued that origin of product should be traced obligatorily through the chain, but be voluntary for the retail sale, including for organic product. Another said place-of-farming labelling would create difficulties for processors using materials from different countries.

Other comments on EU farming requirements

Other comments on EU farming requirements included the suggestion to add the name of producer on packaging, the request that any scheme must apply to all product from inside the EU and outside, the fear that consumers would be confused if the indication of the place of farming appeared alongside a Protected Denomination of Origin (PDO) label, and the warning that too many logos would confuse consumers.

Add name of producer on packaging. Where EU standards are respected for imported product: how can this be controlled? Need a transparent system without too many burdens

Mandatory country of origin labelling should be extended to all meat. Any scheme must apply to all product from inside the EU and outside. Consumer will be confused by a place of farming logo and the PDO logo. A general EU quality logo would be useful. Greater harmonization of farming methods is needed in the EU. Failure to include these non trade concerns in WTO has left farmers at a competitive disadvantage. An EU logo is essential to underpin safety, said one. Origin of raw material must also be shown.

The multiplication of logos is causing confusion.

EU and non-EU pork must meet the same standards

No new labels are needed. Origin of raw materials is preferable to country of origin labelling

Labelling should remain voluntary and an integrated production label or high nature-value label should be developed.

One respondent doubted adherence by farmers to EU farming requirements. EU origin is not enough (want country). More labelling requirements will confuse the consumer. Origin of raw materials is needed. A coherent framework is needed: for baseline products, no logo, but use place of production of raw materials; for value added characteristics, use a system of indicators. EU and non-EU logos should be differentiated by color. Do not make labelling compulsory. Controls will be important

Fair trade should be promoted by Commission as a tool for support of farmers in developing countries

Certification should go beyond baseline schemes to value-added schemes.

1.2. Question 2

How does laying down product identities in marketing standards in EU legislation affect consumers, traders and producers? What are the benefits and drawbacks?

The vast majority of respondents was in favour of keeping EU-level product identity definition as they were. Support was lower from national administration but still majority. Some asked for simplification of the present rules – including a significant number of national administrations. Few supported the deletion of EU-level product identity definitions.

Given the support, a large number of benefits were quoted. They focused in majority on two aspects: consumer protection and consumer information on one hand; fair competition and transparency of the market on the other hand.

Drawbacks mentioned included extra costs, reduction of choice for consumers and increase of waste, bureaucracy and the need for flexibility for local conditions or old varieties.

National authorities were in majority in favour of product identities being laid down in marketing standards. An important minority in favour called for simplification, particularly for F&V, and/or to limit the number of products/sectors covered to the strict necessary. A little minority was completely against any marketing standards.

One **third country** was in favour of defining product identities, except when there is protectionism underlying (accusing olive oil EU rules to be protectionist)

Regional and local authorities unanimously supported laying down the definition of product identities in EU marketing standards. Only one suggested simplification (and at the same time an extension of the scope). There was also a suggestion that more sectors should be covered.

There was an overwhelming support from **farming organisations** to maintaining product identity defined at EU level, a small percentage of them asking for simplification (e.g. limit to sectors where free market fails, derogations for local and/or organic production). Few organisations considered that such issues should be left to the market.

Only three **individuals from the farming sector** clearly took position (in favour) on the need for product identity definitions in marketing standards

and none against. The others expressed themselves only on benefits and drawbacks.

Trade organisation or firms were mainly in favour of EU defined product identities. One recognised their benefits but stressed the need for them not to be too prescriptive.

Processing organisations or societies were in a vast majority in favour of maintaining product identity defined at EU level while some asked for simplification (e.g. for carcasses definitions which can be simplified). Deregulation should be envisaged if sector requests it. Few opposed in principle to the concept of marketing standard. Legal certainty was mentioned as a benefit while innovation handicapped and lower quality produced were quoted as drawbacks. Few answers seemed to be linked to a specific problem (e.g. soy milk; "fresh" meat; veal definition)

Consumers' organisations were in favour of product identities to be defined at EU level. One of them would accept some simplification while another one thought that simplification would confuse consumers.

As regard the opinion of **individual consumers**, they supported product identities defined at EU level, some expressed unclear opinions (balanced benefits and drawbacks) and other were against mainly because criteria for the definition are not the correct ones (should only be the taste or the method of farming).

Academic organisation, think tank and Universities were largely in favour. 2 asked for a simplification of contents or a reduction of number of products concerned. 2 other were against because it went against free trade or because there was no need of such definition at EU level. Drawbacks quoted included less flexibility for commercial private negotiations, too technical, difficult to implement by producers and to control efficiently, and a need to follow international standards.

Others organisations also supported the current approach, with just one contribution opposing any public intervention in this field, among others because it may encourage black market. One answer stressed the need to avoid over prescriptive provisions, another one the need to base standards on other criteria than aesthetical (taste, regional origin, date of harvest...) Derogations for organics were requested.

Should the retail sale of products that do meet hygiene and safety requirements, but do not meet

the marketing standard for aesthetic or similar reasons, be allowed?

If so, should such products require specific information for the consumer?

If no, please explain

Most of respondents were in favour of allowing retail sales of such products, except a significant minority of farming organisations including some European Federations. They were afraid that it would define a lower quality standard vis-à-vis the current production and will increase price pressure on quality products.

There was no clear trend as to the need of any specific labelling for such products. However, some ideas were expressed such as the products could be labelled "non-standard products" or "indented for processing". They it could be sold under other names or on different display units and the harvest/picking date could be indicated.

Only one **national authority** opposed the proposal, favouring shipment to the processing industry. It would however accept derogations when unaesthetic aspect is due to a ban on chemical treatment. Another suggested it for direct sales.

Nobody opposed a specific labelling. A voluntary labelling was suggested, as well as an additional category, specific selling places, or a label like "Off-class".

Only one **regional or local authorities** opposed the idea.

It was suggested that compulsory categories would become voluntary and to regulate the possibility to have "irregularities" and impose to justify them.

Farming organisations supported it in majority but warn that smaller sizes should not meant that fruits could be picked before maturity. Other ideas expressed included:

- other names should be used
- should be labelled "indented for processing"
- could be labelled "non-standard products"
- should not be sold as 1st grade/quality
- using the term "vieux" for cheeses having passed the sale date.

These organisations were usually in favour of a specific labelling

Individuals from the farming sector were almost unanimously in favour, a majority supporting a specific labelling. They requested a "terroir" term to be defined and a specific classification for those products. The fear that it would lower prices and penalize farmers at the end was also expressed.

Trade organisation or society clearly supported it. Some organisations supported a labelling for non-processed products but not for processed products while another was against any specific labelling.

2 Fruit and vegetables organisations were against the proposal as it would lower the quality, as product sold normally to processing industry would be sold to consumers

Processing organisation or society were largely in favour. A specific labelling was requested by several respondents. Ideas expressed included:

- Indicate the harvest date
- Sell the products under another commercial name
- Sell the products on separate shelves or display units
- Explain why the product is unaesthetic (traditional production method)
- Precise date of picking & class origin

Retail organisation or society unanimously supported the proposal, asking for specific information might be needed. They suggested that price could be lowered and explanation provided to consumers, or "not graded" indicated

Consumers organisation asked for information, did not think it was necessary or suggested to sell these products in designated places such as markets, indicating "non standard" products. One organisation welcomed the review of the F&V marketing standards.

Consumer / general public expressed a huge support, sometimes requesting additional information; one suggested creating a category "off-standard" sold cheaper

Those against consider that it would undermine years of efforts to sell products of better quality on the market and that overripe fruit releases ethylene which speeds up the decomposition of surrounding fruits - those fruits should therefore be sold in specific shops.

Registered academic organisation / think tank / University expressed their support, one organisation mentioned that it would be beneficial for small producers, especially in mountain regions.

Additional information would be welcomed and they should meet quality requirements such as freshness, maturity...

Among **other organisations** one feared a lowering of the quality standards but would support it for PDO and PGI.

Could compulsory quality and size classifications be made optional as 'optional reserved terms'?

Opinions were in general split as to the need for such classifications to be compulsory or voluntary. National administrations, producers and processing operators appeared to favour compulsory classification.

Arguments against these optional reserved terms included fears that this would lead to a lack of information (problem of market transparency), and that producers would be weakened vis-à-vis the retailers. On the other hand voluntary classifications may open markets to new products and reduce costs.

National authorities were especially against for fruit & vegetables, basic foodstuffs, when marketing standards already exist or when there is a need of basic quality requirements. Derogation should be envisaged. Those in favour thought it would be feasible for certain products & the size or for non-basic foodstuffs. Legal definitions were requested. Any details affecting the product quality was asked to appear on packaging.

One **third country** expressed its preference for voluntary norms, only indicative. Another one would encourage optional size and quality classification and consider CODEX standards, as well as encourage more liberal standards, moving away from size classifications. It insisted on not creating identities that only reflect the EU-produced characteristics (ex: gala apples).

Regional/local authorities were split (50-50): some regions argued that marketing standards should remain compulsory, other supported optional classification and some asked them to be delegated to private certification systems.

A majority of **farming organisations** opposed it for the following reasons:

- producers would be weakened vis-à-vis the retailers
- lost of readability for consumers, provide info to the consumers

- help comparing prices
- however norms have to adapt, evolve
- grading is essential for fruit classification
- fear that would increase imports
- different sizes should however be allowed

Those in favour said that:

- It would reduce costs
- It would be possible as soon as the rules are decided at EU level and uniformly applied
- Consumers make their choice on taste
- It should however not misled consumers

2 suggested a case by case approach.

Individuals from the farming sector were also split (50-50). Some said yes if it was up to the producer and if the consumer was informed and that it would help new products to access the market. Other said that it was needed for some products like potatoes.

Trade registered organisation or society were either in favour, for unprocessed food or against as they said there was a risk of unfair competition.

Processing organisation or society were in majority against as these standards had proven to be beneficial for both producers & consumers and that the EU should avoid proliferation of optional terms as well as there is a risk that it would lead to less transparency. For spirits, a fixed bottle size regime provides consumer protection & supports industry investment. It could be however envisaged on a case by case basis.

Contributions from **consumers / the general public** mentioned that size is not related to quality, grading is superfluous, quality & size should be an issue for market forces and retailers would know when size has to be mentioned. Other highlighted that it would be confusing, it was needed for market transparency, consumers were used to it, it explained the price, guaranteed a certain price and quality and that consumers needed objective criteria to make their choice and preferred to have a uniform product (25)

Registered academic organisation / think tank / University were rather in favour in particular as regard the compulsory indication of size. According to one contribution, these standard increased prices. However, the proposal would enable products not filling these standards to be sold. Other contributions, against, argued that they helped comparing prices, avoiding too many private rules

and were important in particular for quality classification (compared to size). There was therefore a proposal to create a new class of products "Off-grading"

Other organisations rather oppose the idea, as these standards help the trade and consumers to make their choice. Those in favour consider that the proposal would enable other products to access the market as products of old traditional cultivated plants & livestock breeds that do not always conform to modern concepts of "attractive".

1.3. Question 3

To what extent is it necessary to lay down definitions of "optional reserved terms" in marketing standards at EU level? Should definitions for general terms describing farming methods in particular sectors, such as "mountain products", "farmhouse" and "low carbon" be laid down at by the EU?

There was a very large consensus in favour of "optional reserved terms" to be defined at EU level in marketing standards. Only one category of stakeholders (processors) was rather against such definitions.

The same arguments in favour of reserved terms were often found: harmonisation, transparency for consumers, facilitation of intra trade, and protection of added value for producers. However, it was also commonly agreed that proliferation and unnecessary costs should be avoided.

Terms to be defined in priority would be "mountain" and "farmhouse", as there seemed to be a real lack of harmonisation and minimum criteria for them. The support for a "low carbon" definition was less unanimous.

Opinions in favour of definitions included:

- Improves transparency for the consumers. As long as terms used for marketing purpose are not defined there is a risk of misleading for consumers. It is generally recognized that behind these terms which valorise the products (sold at a higher price) there are consumers' expectations concerning the farming method.
- Improves harmonisation. It may happen that the same terms are used in different Member States but do not correspond to the same methods of production, of definition. Several answers limit the necessity to develop definitions to cases

where particular terms are used in several Member States.

- Facilitates intra trade: EU definitions allow comparison between comparable products.
- Avoids distortion of competition: such terms if clearly defined protects added value and guarantees a fair financial return to producers. As long as these terms are not defined they may be used in an abusive manner which results in distortions of competition.

The arguments to oppose self-regulation included:

- For certain operators (mainly processors), horizontal rule on labelling (notably the general prohibition to mislead consumers) is sufficient.
- Certain terms may be very subjective (i.e. "fresh", "natural", "low carbon", etc.) and therefore too difficult to define at EU level. National guidelines could be sufficient.
- Too costly since controls will be needed
- Consumers prefer brands rather than labels
- Processors who are mainly against EU definition of reserved terms including "mountain" consider it would possibly mislead consumers
- EU is not able to follow consumers trends, too much information on the labels

1.4. Question 4

To what extent could the drafting, implementation and control of marketing standards (or parts of them) be left to self-regulation?

A clear majority of respondents was against self-regulation. This was a particularly shared opinion among National authorities, regional and local authorities, farming registered organisations with only one respondent in favour in each of those categories of respondent. Processing and retail organisations were also clearly against.

Their arguments against self regulation included the fact that marketing standards are useful tools to compare prices and quality, the fact that self-regulation would lead to lower quality. The risk that the strongest actors of the food chain would impose their rules on the others as a result of the imbalance of power in the food chain was also mentioned. It may also create different

standards in the single market and therefore lead to distortions of competition between producers and between operators.

Most of the respondents in favour of self-regulation were also in favour of safeguards: rules drafted by all actors in a transparent way; responsibility of the controls left to the EU authorities or at least comparable and compatible with EU legislation.

The arguments to oppose self-regulation included:

- Marketing standards are useful tools to compare prices & quality
- It would lead to lower quality, as the quality is the adjustment tool of prices
- It would add costs to enterprises
- Few actors would be involved and as the power in the food chain is not balanced enough due to conflicting interests, the strongest actor of the food chain would impose its rules to the others actors
- It would create different standards in the single market and therefore lead to distortions of competition between producers as well as a lack of harmonisation.
- It would lead to inefficiency as well as reduce credibility for operators and distortion of competition between operators
- It would lead to product standardisation, and maybe to a proliferation of private standards

Other comments from contributions opposing self-regulation:

- A consultation with the actors of the food chain would be welcome
- A cooperation between the retail sector and the authorities is expected as well as a code of Practice to complement the legislation
- Controls should be performed by the public authorities
- The creation of an independent "European Food Trading Agency" would help
- Self-regulation should not apply to the environmental and the animal welfare field

Opinions in favour of self-regulation requested however:

- A common EU basis should be agreed first

- The definition of the standards should be drafted by all actors in a transparent way
- The responsibility of the controls should be left to the EU authorities or at least comparable and compatible with EU legislation
- Public intervention should be possible when consumers are misled
- Food safety matters should be left to regulators and self regulation used for other issues (size, visual look)

Other comments on self-regulation:

- It could be allowed only on a case by case basis, for example only when direct sales by farmers to consumers
- It could be only for additional requirements, for very specific products or in areas not regulated by the EU nor by international standards
- It has already been done in certain regions or sectors and worked well.
- It enables a flexible approach to different market across Member States and a quicker response if changes are needed

If marketing standards (or parts of them) remain governed by EU law, what would be the advantages and disadvantages, including in respect of the administrative burden, of:

- using co-regulation?*
- referring to international standards?*
- keeping the current legislative approach (while simplifying the substance as much as possible)?*

Co-regulation received a mitigated support from the majority of respondents. Some organisations from the wine sector and the trade sector considered that co-regulation would lead to more relevant practices but also to higher costs for the operators while national authorities as well as farming organisations largely opposed it, warning that the power in the food chain is unbalanced and that this would lead to some actors imposing their rules.

Referring to international standards was in general not opposed, as long as it neither lowers EU standards nor reduces the EU capacity to modify its standards. As far as the trade, processing and retail sectors were concerned,

they were overwhelmingly in favour of such standards.

A clear majority would favour keeping the current legislative approach while simplifying. Simplification should mean simplification of procedures and not a lowering of EU standards. The retail sector would also like more harmonisation.

Some organisations of the farming sector however supported co-regulation suggesting achieving it through voluntary code of practices or applying it for innovative products.

Other comments on marketing standards:

- More harmonisation is needed as well as higher involvement of stakeholders.
- It is suggested to involve the normalisation organisations
- Simplification should not lead to national standards and should not mean lowering the EU standards
- Simplification
- Current marketing standards are simple enough
- There could be different level: co-regulation for new innovative products, marketing standards with simplification for others, respecting international standards
- The procedures should be simplified, not the content
- The interpretations of marketing standards by Member States should be harmonised
- There is a risk that keeping the current approach would mean no evolution of the legislation, a periodic review would be needed
- The current approach is heavy and slow
- Some contributions supported the simplification of the fruits and vegetables marketing standards, other regretted it

Other comments on co-regulation:

- It could be considered on a case by case basis
- It may bring some benefits in terms of product identities
- It should stay at EU level without subsidiarity
- A legal framework would be needed

- The control of the public authority would be needed
- It would be more flexible
- Only if all stakeholders would be involved
- Controls based on risk assessment and market related penalties should be applied
- It would be better than self regulation
-
- It would lead to confusion
- It should not be used to discriminate certain producers
- Public should be consulted prior to adoption
- The strongest actor of the food chain would impose its rules to the others actors, small producers would not have their voice heard and consumers' rights would not be respected
- It would not guarantee enough controls

Other comments on international standards:

- Codex and CE-ONU could be relevant even if Codex can be very bureaucratic and favour imports and not exports
- It is important that all standards are enforced consistently in all the Member States
- It would facilitate trade, facilitate the comparison between products from 3rd countries, international harmonisation and reduce emergence of specific 3rd countries standards
- They may be too general and do not address regional specificities
- The operators should be consulted first
- They are irrelevant when EU has higher standards but useful for non-EU products (e.g. yak meat)
- They would reduce EU room of manoeuvre to change its standards
- Once adopted, the EU would have to change its way of participation in the standard setting bodies: wider consultation, more transparent, decision making at the stage of proposal

1.5. Question 5

Is there a need to clarify or adjust any aspects of the rules laying down the rights of geographical indication users and other users (or potential users) of a name?

About half of the contributions made clear that the current framework laying down the rights of geographical indication users and other users is sufficient. Different issues have been raised by the other half of contributions. Among the aspects for which clarifications have been asked most often, were the need to clarify the rights, duties and tasks of applicant groups (National Authorities did not raise it though); the application of articles 13 and 14 of Regulation (EC) No 510/2006 and the use of geographical indications as ingredients (this issue is treated more extensively under question 8).

Although national authorities did not raise it, **the issue which was asked most often to be clarified were the rights, duties and tasks of applicant groups.** This was done by several regional authorities, farming organisations, a trade organisation, many processing organisations, some individuals of the general public, academic organisations and quality organisations (within the category other). In this regard more specific items were asked to be clarified such as: the ownership of the intellectual property right of the geographical indication, the right to determine the volume of production, the right to determine the use of a geographical indication as an ingredient, the defence and protection of the geographical indication, the right to make certain operations obligatory in the area, the promotion of the geographical indication, the right to adapt the size of the logo to the specificity of the product. While the majority simply asked to clarify the issue, some farming organisations, regional authorities, individual consumers and quality organisations asked to give more powers to producer groups in relation to these issues. Several trade and processing organisations expressed against this.

The 2nd most cited issue was the need to clarify the application of articles 13 and 14 of Regulation (EC) 510/2006. Few respondents (one national authority and one other organization) have asked to better define the concepts mentioned in article 13 of Regulation (EC) 510/2006. Some farming organisations asked to define a clear borderline between trademark protection and geographical indication protection and suggested to

limit the registration of trademarks containing geographical indication terms. A similar idea was expressed by a national authority who wanted to have tighter rules for use of geographical names, especially by trademark holders. Some individuals from the farming sector asked to reinforce protection against trademarks that try to link themselves to geographical indications. A consumer organisation highlighted that confusion arises when a trademark uses very similar or identical terms as a geographical indication for a product from the same category. One academic organisation indicated it would be better for the consumer if only a geographical indication could use geographical names.

One quality organisation within the category others, considered there is a need to explain to national trademark offices and the Office for the Harmonization of the Internal market (OHIM) not only the application of articles 13 and 14 of Regulation (EC) 510/06 but also the articles 44 and 45 of Regulation (EC) 479/2008 and articles 16 and 23 of the Regulation (EC) 110/2008. This organisation expressed that by virtue of these legal provisions, trademarks' applications identical or confusingly similar to a geographical indication must be refused. A retail organisation expressed concern about the refusal of trademarks with a connotation of label because they potentially could be competitors to PDO/PGI quality labels. One other organisation and a national authority expressed some concern concerning the coexistence provisions of article 14 (2) of Regulation (EC) 510/2006. One farming and one processing organisation explained that article 14 (2) of Regulation (EC) 510/2006 and article 44 (2) of Regulation (EC) 479/2008 should be more consistent. One processing organisation expressed that for some earlier registered spirit names which have been listed in Annex III of Regulation (EC) 110/2008, the rights of other users might not have been properly weighted as they will not have gone through an objection or opposition procedure at EU level.

As for the use of a geographical indication as an ingredient, some farming organisations asked for clarification for the relation between article 13 (EC) of Regulation 510/2006 and the Labelling Directive 13/2000. Some suggested to establish a framework for the use of geographical indications in food. One processing organisation suggested a common guiding document referring to some common principles. Several processing organisations, mainly from the dairy sector, said the ability to use the name of the PDO/PGI is free. They considered that

the name of a PDO/PGI shall be used in line with the basic principles laid down in the EU Labelling Directive 13/2000.

What criteria should be used to determine that a name is generic?

Through all the contributions which have been received in answer to this question, the jurisprudence of the European Court of Justice has been highlighted as the most important source to take into account when determining if a name is generic or not. Some suggested working on a case by case basis on the basis of this jurisprudence of the European Court of Justice (ECJ) and the current criteria included in Regulation (EC) No 510/2006.

In addition several respondents highlighted one or more specific criteria, like: situation in the country of origin; perception of the consumer; lack of a link with the geographical area; existence of a standard in the Codex Alimentarius; duration of the use of a name etc. There were mixed feelings on establishing (or not) a list of generic names. In total more than 20 different criteria have been proposed.

Some member states mentioned specifically that the situation in the country of origin should be a criterium. Although few member states suggested establishing a list of generic names, several expressed against such a list or thought that the making up of such a list would be problematic.

The regional authorities mentioned most often as criteria the lack of a link with the geographical area and secondly the duration of the use of the name.

When referring to specific criteria, farming organisations most often referred to (in ascending order): the perception of the consumer; the lack of a link with the geographical area; the existence of a standard in the Codex Alimentarius; the duration of the use of a name; the situation in the country of origin and the existence of a definition in international agreements (such as the Stresa Convention).

Among the criteria mentioned by the trade organisations were included: the existence of a standard in the Codex Alimentarius; the fact if a name is mentioned in the footnotes of Regulation (EC) 1107/96; the existence of a definition in international agreements or being mentioned in annex B of the Stresa convention; the fact if a name has a been registered as a geographical indication

and the existence of a registration as a TSG. In addition, some trade organisations asked to place greater emphasis on craft expertise, specialist books and business papers when assessing commercial usage of a name.

A majority of processing organisations who responded, referred to the existence of a standard in the Codex Alimentarius. Also, it was suggested to take into account if a name was mentioned in the footnotes under Regulation (EC) 1107/96; look at the percentage of total production produced inside and outside the defined geographical area; the duration of the use of a name and the existence of a registration as a TSG. Several processing and trade organisations, mainly from the dairy sector, indicated they were in favour or open to discuss about a list of generic names. Some dairy organisations suggested to include in EU legislation a rule whereby the applicant has to prove the non generic character of the product or foodstuff in question. Still within the dairy sector, it was proposed to take into account when a member state has declared part of the name of registered geographical indication as generic. Few processing organisations, mainly from the wine and spirits sector, thought it was not necessary to determine criteria.

Retail organisations mentioned as main criteria the fact if a name is used for products produced outside the geographical area and the length of the use of a name.

No criteria were suggested by consumer organizations. One consumer organisation said that in case it is proven that a geographical name corresponds with a product which has a specificity due to a certain geographical area, the geographical name in question should not fall within the generic field.

As for the general public, the following criteria were mentioned most often: the place of production of the raw materials; the place of production, transformation and packaging; the lack of a link with the geographical area and the duration of the use of a name. Some said the current criteria were sufficient and others thought it is not necessary to establish criteria to determine if a name is generic.

Academic organisations emphasized the situation in the country of origin and the perception of the consumer as main criteria.

Within the category 'others', more specifically for the quality organisations, the situation in the country of origin and the perception by the

consumer were most frequently suggested as criteria.

Are any changes needed in the geographical indications scheme in respect of:

– the extent of protection?

– the enforcement of the protection?

– the agricultural products and foodstuffs covered?

• **the extent of protection?**

Whereas a majority of processing organisations, general public and academic organisations expressed against any changes with regard to the extent of protection, a majority of farming organisations, regional authorities and quality organisations (category 'other') were in favour. As for national authorities opinions were equally divided.

It was requested by several respondents to extend the TRIPS (Trade-Related aspects of Intellectual Property Rights) protection of wines and spirits to all other products and to create an international register for geographical Indications (GI's). At the same time it was asked to improve the protection outside the EU through bilateral agreements with third countries (this issue is treated also under question 7).

Some suggested to make a differentiation according to the export possibilities to third countries thereby concentrating mainly on products having export potential outside the EU and the risks of abuses.

Few respondents emphasized the need to explore the possibilities of establishing a system at the level of member states for local products produced on a small scale.

Few respondents proposed that the extent of the protection should cover the use of geographical names in the domain names, such as the ccTDLs (the country code top level domains of Member States, such as .fr, .it, etc. as well as .eu).

• **the enforcement of the protection?**

Within all categories it was estimated there is a need for a better administrative enforcement of protection within and between Member States. To a lesser degree, some indicated the enforcement of protection in third countries is a problem.

A majority of respondents emphasized that this should be done by clarifying and harmonizing at EU level the responsibilities, investigation procedures and sanctions of national control bodies to guarantee an equal application in all Member States.

Different options in this regard have been proposed: the creation of EU guidelines; the inclusion of an explicit reference in article 13 (EC) of Regulation 510/2006; the establishment of an EU structure, such as an European Agency for geographical indication to facilitate the management and the protection of GIs (both within the EU and in third countries).

Some contributors stated the need for a clear identification of competent authorities in charge of protection. In addition, some respondents indicated cooperation between competent authorities and control bodies in different member states should be reinforced.

One processing organisation stated that in order to have a credible system, controls should be done by independent bodies respecting the norm ISO 45011.

- **the agricultural products and foodstuffs covered?**

In contrast to the processing sector where a clear majority expressed against any extension, a majority of the general public, national and regional authorities, academic organisations/think tanks and quality organisations expressed in favour for extension of the scope of products. About as many farming organisations were in favour and against an extension.

Suggestions for new products to be covered included processed products, distillates for human consumption not made from wine, natural products (e.g. wild berries), ice-cream based on milk and water, artisan products, textile, cigars, silk or wood. However, some organisations explicitly expressed against including non-agricultural products.

List of suggestions for extensions received:

- non-agricultural products
- all food products
- processed products
- receipts (e.g. traditional)
- cooked meals and culinary preparations

- distillates for human consumption not made from wine
- natural products (e.g. wild berries)
- ice-cream based on milk and water
- boiled, raw, filled pasta
- precooked foods
- local animal races (special attention to races in danger of extinction)
- cooked or barbecued meat products
- vegetables consumed mainly cooked or precooked
- artisan products
- textile
- cigars
- silk
- leather
- products of the sea
- wood

A farming organisation and quality organisation proposed not to have a formal list of eligible categories, but a general definition of the concept of a geographical indication (possibly accompanied by an indicative list). This would allow an assessment of the applications on a case by case basis and avoid future legislative interventions.

Should the use of alternative instruments, such as trademark protection, be more actively encouraged?

A majority of respondents stated that geographical indications and trademarks are not alternatives but two systems distinct in nature that should co-exist.

Some stated both systems could be complementary. Several farming organisations indicated that collective trademarks could be interesting to use in the case of international trade in certain 3rd countries. Collective trademarks could be an alternative to geographical indications for certain typical local productions linked to an area having a limited economical impact. Few processing organisations, within the dairy sector, asked to encourage the use of collective trademarks not linked to protected denominations of

origin/protected geographical indications (PDOs/PGIs).

1.6. Question 6

Should additional criteria be introduced to restrict applications for geographical indications? In particular, should the criteria for protected geographical indications, as distinct from protected designations of origin, be made stricter to emphasise the link between the product and the geographical area?

The majority of respondents were against introducing additional stricter criteria for geographical indications. It is not the high number of names which weaken the system but the lack of communication. A vast majority of respondents asked for a better communication on current schemes and European symbol before adding new criteria.

More flexible criteria regarding the origin of raw materials were asked mainly by French contributions. The origin of the raw materials should be indicated if there would be a risk of misleading the consumers (see also question number 9 below).

Reinforcement of control by the Member States and a harmonised application among them was part of the raised issues as well as the need for an Agency to help the registration and management, harmonisation of implementation of legislation and controls. Besides, there was a proposal to merge the PDO and PGI schemes with a more flexible approach to origin and use of raw materials from outside the area.

Arguments against stricter criteria

- Stricter criteria do not have to be introduced in order to reduce the number of registration. High number of names protected is an indication of the success of the system, raise the notoriety of the schemes and show the diversity of gastronomic tradition.
- No need for adding criteria but more rigour in the interpretation of the current ones in order to reinforce the credibility of the system. The criteria and the differences between PDO/PGI/TSG should be define more clearly. A harmonised application of the registration criteria among Member States is also important;

- Already very strict criteria and long procedures specially taking into account the distribution of the premium price (the producers receive only small part of it);
- Additional criteria would discriminate countries where the system is not yet very well developed;
- It will be unfair for new applicants in relation with the names already registered. In this context the existing protected names should be revised;
- It would cause higher costs for producers and could force producers out of the market;
- Criteria based on the production volume and the size of the producers group should not be added. The small producers shall have access as well, they are important for the economy of the region. The volume of production should not be a condition but seen as a result of the protection.
- Keep the differences between the PDO and PGI. Strengthening the link for PGI will be confusing with PDO
- Difficult discussion WTO The relation between the additional criteria and TRIPS shall be analysed as well
- The proposal could be premature as the Commission funded research on the economic value of PDO/PGI is expected to begin in 2009

More flexible criteria regarding the **origin of raw materials** were asked mainly from France. Allowing raw materials to come from a larger area than the geographical area will support the development of the region, the preservation of traditional production methods of "proximity supplying", the use of local knowledge.

Arguments in favour and proposed stricter criteria

- Too many names protected and broad concept of GIs will dilute the value;
- Difficult position in the negotiations, the list of GIs in trade agreement should be limited;
- Strengthening the link between product and geographical area for PGI, restriction of the raw materials to geographical area. This will respond to consumers' expectation that raw materials and the production of the end product are at the same place. Better traceability.
- Economic criteria linked to the production volume and potential for export should be introduce, proposal mainly from Italy. This will

lead to protection at 2 levels: only national protection for GI produced in small quantity and marketed only in local areas and protection at EU level for product which present a potential for export.

- Restriction of the origin of raw materials will encourage production in the processing area, too often the raw materials are sold outside the geographical area for processing.
- Deeper checks to avoid registration of "madeup" products;
- Better definition of the geographical area (a given region) and obligation to have the name of the region included
- Requirements to prove the anteriority use of the name

A repetitive issue was the measures to be taken in order to **avoid consumer confusion**. In this context, if risk of misleading the consumers, the origin of the raw materials should be indicated.

Reinforcement of the control by the Member States and a harmonised application among them was among the raised issues as well as the need for an Agency to help the registration and management, harmonisation of implementation of legislation and controls among Member States and a proposal to merge the two systems in one with a more flexible approach to the origin and use of raw materials from outside the area.

Should specific sustainability and other criteria be included as part of the specification, whether or not they are intrinsically linked to origin?

If so, what would be the benefits and drawbacks? If not, please explain

A large majority of respondents from different sectors, with the exception of National authorities and individual consumers/farmers, were opposed to specific sustainability and other criteria. Among the number of those who expressed against such criteria, main disadvantage mentioned were the risk of consumers confusion and the risk of a reduction of benefits. Some who objected thought that this criterion could be made voluntary.

Respondents in favour underlined as main advantages better consumer information or the need to introduce environmental criteria. They also suggested that the criteria be voluntary.

The majority of respondents in favour from the National Authorities sector and consumers sector, and the minority of respondents from other sectors underlined as main advantages better consumer information or the need to introduce environmental criteria. A few were aware of increase in costs or the risk of consumers' confusion.

Observations appearing throughout the contributions in different sectors include:

- some mention a **risk of confusion with organic farming**, as sustainability is already included there
- **disadvantage** in the difficulty to explain to third countries; is not required at WTO level
- A few express disadvantage that sustainability is not a priority criteria for quality (conflict between modern ideas of sustainability and traditional production methods), it would be difficult to link it to production area of PGIs (long supply lines), would make monitoring compliance and audit more difficult
- a few respondents stated that sustainability criteria could be resolved with a quality sign: "low carbon emission"
- individual responses referred to **advantages** like incentive to adopt best practices; reinforce local and regional participation; possibility to manage production volumes; producers could ask higher prices
- A few underlined that Producer Groups could prepare cahier des charges and educate farmers on sustainability criteria
- advantage in advocating good consumers perception on environment and animal welfare, but would need to be defined, as additional criteria could be introduced like maintenance of local identity, culture, gastronomy

1.7. Question 7

What kind of difficulties do users of geographical indications face when trying to ensure protection in countries outside the EU?

There was a general concern of the lack of protection of GI in 3rd countries, mainly expressed by farming organisations and some Member states, but also by consumers (France).

Stakeholders identified problems they face when exporting EU products bearing geographical

names protected as PDO and PGI. Third country organisation mentions that international trademark and fair trading regimes provide enough protection for brands.

The first set of problems concerned the protection provided by TRIPS. Stakeholders underlined the difficulties to enforce the protection provided by TRIPS, mainly because it was complex to prove the GI "status". Infringements of GI rights were also difficult to prove. Major problem was also the low level of protection provided by TRIPS (especially for products other than wine and spirits), and that the protection was reduced by the scope exceptions enshrined in Article 24.

The second set of problems was the relation to trademarks, when a previous trademark had already registered the name.

The third set of problems referred to the generic use of the protected name or its translation.

Problems related to counterfeiting were often mentioned as well as the fact that the EU did not sufficiently enforce bilateral agreements.

One third country mentioned that many EU Geographical indications are presently generic terms in third countries, as results of European immigration. It was also mentioned that the main problem for EU GI's is that they are not competitive;

Some respondents, mainly from Italy, have also mentioned misuse or deceptive presentation of place of origin of the product, as to European Member states.

Beside the intellectual property problems, stakeholders have also pointed out the lack of understanding of the "GI concept".

Some stakeholders, mainly from France, were also surprised by the fact that EU regulations on GI's is open to third countries and no reciprocity is existing in majority of third countries.

What should the EU do to protect geographical indications in the most effective way in third countries?

A majority of respondents supported the negotiation of bilateral and multilateral agreements in the framework of the World Trade Organisation (WTO) - a majority mentioned the TRIPS Council. Some

stakeholders did ask for more proactive and strong positions in both arenas, bilateral and multilateral. As regard multilateral negotiations, a majority of stakeholders supported the creation of a legally binding register for GI's, for wine and spirits but also open to all goods.

It was also mentioned the inclusion of GI's in the scope of Anti-Counterfeiting Trade agreement (ACTA). In bilateral agreements, although GI provisions should be included in every agreement, the idea to select strategic countries was raised by stakeholders in several responses.

One Member state recalled that protection granted to names of some Member States becomes a burden for the rest of the EU in the international arena. It was also mentioned that no preferential treatment as economic support for activities in third countries should be granted to GI's.

On the **multilateral negotiation**, majority of stakeholders supports:

- The creation of a legally binding register for GI's, for wine and spirits but also open to all goods.
- The extension of protection existing for wines and spirits to all goods;

Concerning **Bilateral agreements negotiations** they shall be considered in the perspective of the difficulty to conclude multilateral agreements. Some concerns have been raised as to bilateral negotiations:

- It has been mentioned the need to negotiate bilateral agreements that cover all agricultural products and not limiting it to wine and spirits.
- Objectives of the negotiation should be both ensure protection and enforcement of protection.
- Although GI provisions should be included in every agreement, especially in free trade agreements (FTA), the idea to select **strategic countries** has been raised by stakeholders in several responses.

The issue of the **number of GI's to be protected** in a bilateral agreement has also been raised in the context of the consultation. An important number of stakeholders have raised concerns on the long list of names for which protection is seek in a bilateral agreement, and ask for a pragmatic approach consisting in creation of reduced list for each negotiation. The list should be drafted following economic/export and risk of usurpation criteria. On the opposite side, other stakeholders mention the need to protect all the registered PDO/PGI, as it

would prevent future usurpations of notoriety, and serve to protect the concept of GI's as itself. CEPS organisation required further dialogue with the Commission on this delicate issue.

It has also been mentioned also to concentrate on **strategic trade partners** to negotiate against imitation and aiming to restore evaded and usurped GI names.

Several **new ideas** have been proposed by respondents aiming to **ameliorate GI protection** through an external policy:

- To increase protection against counterfeited products. Inclusion of GI's in the scope of Anti-Counterfeiting Trade agreement (ACTA) was mentioned by several respondents.
- Majority of stakeholders mention the need to increase communication and information of the GI system and the protected names in third countries as a mean to ameliorate protection.
- To create an European body that would have as main objective to monitor regularly markets and registers as to European PDO/PGI in third countries.
- Further coordination between Member states.
- Bilateral initiatives aiming to prevent conflicts on trademarks.
- European Union could create a program aiming to support right-holders of PDO/PGI facing legal court challenges in third countries.
- To sponsor technical projects to put in place GI *sui generis* systems in some third countries. Under this approach it was also mentioned the need to reinforce GI policy through cooperation agreements.
- Assist marketing, accompany placement of the products, assist and encourage market analysis, encourage purchase of products.
- Negotiate WIPO adhesion of the European Union.

1.8. Question 8

Have any difficulties arisen from advertising of PGI/PDO ingredients used in processed products/prepared foods?

While negative answers (i.e. no difficulties arisen) were expressed explicitly, in a significant number of answers respondents simply declared

themselves in favour of new rules on the advertising of PDO/PGI as ingredients without explicitly indicating whether actual difficulties had already arisen. Half of national authorities answers declared explicitly that no difficulty have arisen so far.

A majority of respondents was in favour of laying down rules on the use/advertising of PDO/PGI as ingredients so as to prevent misleading consumers.

This opinion is especially pronounced among farming organisations and academic organisations.

The most frequent **suggestions concerning possible rules** may be grouped into:

- need for an authorisation of the producer group (or a duty to inform the national authority)
- advertising only if the PDO/PGI is the only ingredient of the same class in the processed product;
- Definition of a minimum requirement expressed as a % threshold to allow the advertising of the PDO/PGI registered name on the label.

Concerns about the effectiveness of controls of the rules' implementation and the need for *ex officio* protection were raised by a few respondents.

A number of respondents across categories is in favour of the use and advertising of PDO/PGI as ingredients, provided that consumers are not misled. No further details is provided in those answers.

The negative view on the need of rules is most pronounced in trade organisations' answers (however the numbers of answers are small).

A number of respondents against possible rules on the advertising of PD/PGI as ingredients indicate that the Labelling Directive 2000/13/EC already lays down adequate rules to protect consumers.

1.9. Question 9

What are the advantages and disadvantages of identifying the origin of raw materials in cases where they come from somewhere else than the location of the geographical indication?

All sectors, besides the processing organisations, were in a large majority favourable to the identification of the origin of raw materials, mentioning as the main advantage better consumer information and awareness. Many

mentioned that it would be justified and/or positive in the case of PGI. Some expressed that this information should stay rather optional.

The processing organisations were in a large majority against identifying the origin of raw material, mainly mentioning as a disadvantage the confusion of consumers. Some expressed the fact that it would not add anything to quality, or that it would be irrelevant for PGI.

Among the other sectors, a minority was against, mentioning as the main disadvantage the risk of confusion of consumers (underlining it in the case of PGI) and higher costs.

There are comments appearing throughout the contributions in different sectors:

- potential problem and **disadvantage for processed products**, due to too much information on the label, and limited space (authorities, retail sector and academic/think tanks). The consumers sector had a favourable response for identification of raw materials for PGI processed products. The trade sector suggested identification is not relevant for PGI's.
- individual contributions stated the problem in the fact that it is not always possible to **source raw material from GI area** (authorities, farming organisations, trade)
- some farming organisations and consumers underlined that **only EU/nonEU** identification should be used, backed individually by regional authority and think tank
- opinions on the advantage of identification of only **main ingredients** linked with opinions on identification depending on the % of raw materials used (ceiling) suggested by farming org., consumers, think tank. Additionally individual respondent pointed out the importance to identify the terms 'bassin de production' and 'ancrage territorial' mentioning practices of raw material sourcing wider than defined GI area.
- disadvantage in **increase of costs** is mentioned by a number of contributions (authorities, consumers, think tank) with retail thinking that higher costs will be a result of changes in packaging as the source of raw material change or because of restrictions on source as a result of identification.
- a few suggest as disadvantage that consumers could have a negative reaction to products with raw material identification (farming org.,

consumers, think tank) with the perception of quality lost (regional authority), one opinion advocating that it would be good to explain to consumers the difference between quality and nonquality.

- quality & origin are mentioned individually by farming and processing sector

Besides the general trends and comments underlined above, there are **different sectoral ideas** highlighted in the consultation.

Individual contributions among **National Authorities** contradicted each other mentioning the obligatory or voluntary identification for PGI's. A respondent insisted on product sourcing at local level and an indication for outsiders: "origin – outside zone". One respondent referred to publicity for areas as an advantage.

A view from **Regional/Local Authorities** mentions to include a norm excluding GMO's.

In the **Farming Organisations sector**, one respondent suggested indication with a derogation only in case of natural disasters in the GI region. One respondent argued it would be sufficient to modify the logo to include: "remotely sourced ingredients".

In the **Processing Sector** individual expressed that a problem can arise if raw material is more renowned than GI name. One respondent suggests describing the term raw material.

The **General Public/Consumers**, a favourable opinion mentions as advantage competition at local level.

Among **Academic Organisations/Think Tank/University** some state as advantage that identification would favorize local sourcing of raw materials.

Among **Environmental NGO** a contribution suggests flexibility when raw materials are temporarily unavailable in the GI area and sourcing has to come from outside. One opinion underlines that sometimes the quality of raw material is better from outside the GI area than from within.

1.10. Question 10

Should the three EU systems for protection of geographical indications be simplified and harmonised? If so, to what extent?

Alternatively, should they continue to develop as separate registration instruments?

The majority was in favour of the harmonisation of the 3 systems: agricultural products, wine and spirits, but keeping their specificity. The processing and trade organisations majority supported the current situation with 3 harmonised but separate systems.

The merging of the 3 systems, with a single register, was supported by third countries' respondents and some of the farmers' organisations.

The consumers were generally in favour of simplification and more coherence.

The harmonisation of 3 systems will contribute to increased understanding of rules and better recognition by the consumers. It will facilitate the communication and promotion, the exports and will increase the credibility in negotiations. They deal with similar problems therefore the certification and supervision could become simpler and cheaper. The harmonisation shall allow keeping the specificity of the sector and avoid ending up with the lowest common denomination.

Among the proposed issues to be harmonised are:

- Common definitions. Some respondents required possibility for PDO protection for spirit;
- Procedures. The objection period should be harmonised and appropriate consultation shall be introduced in case of objections for wine and spirit;
- Extend the level of wine protection to other categories;
- The rules for use of quality symbols;
- The monitoring of registered names;
- Harmonisation of control and shortening of proceedings;
- Relations with TM

Among the arguments for **keeping the systems separate** are the recent legislation for wine, the systems are quite new, they are well understood and they are already harmonised to a certain point so there is no need for further harmonisation. The current systems are adapted to the specificity of the products, harmonisation will be difficult and will imply bigger administrative burden so the proposed solution is simplification in each of the system. Only clarification is needed and harmonisation of

the interpretation among the Member States. These opinions are shared mainly by processing, trade non-registered organisations and some of the farmers' organisations.

Few answers are favourable to a total merge of the systems because too many signs confuse the consumers and this will also provide a better position in trade negotiations.

The harmonisation into one system but with 3 sub-specifications was also suggested.

The creation of a European agency which will contribute to shortening the procedures and eliminate the distortions among Member States was also mentioned.

Precise evaluation of the benefits before taking a decision was asked by some farming organisations.

1.11. Question 11

Given the low take-up of the TSG scheme, is there a better way of identifying and promoting traditional speciality products?

Several stakeholders saw the way forward in simplifying and streamlining the provisions of the scheme: most pronounced ideas seemed to be that only registration with reservation of the name would be possible. Other improvements that were suggested are simplification of the procedure and control provisions, new logo, and extending the scope.

Some stakeholders called for a communication and/or promotion scheme while others were in favour of *status quo*.

As an alternative to TSG stakeholders most frequently proposed that a reserved term be defined. Other suggestions included its replacement by the introduction of guidelines or "code des usages" at EU level, conversion of existing TSG to GIs system, replacement with a national system, and to have recourse to trade marks. Sometimes simply a deletion of the scheme was proposed.

It has to be noted that in the consultation considerable support was expressed to TSGs scheme while pointing out its importance.

There were also claims that traditional products were linked to local know-how and therefore an instrument of protection at regional level for local artisanal products made according to traditional methods is needed.

1.12. Question 12

What factors might inhibit the development of a single EU market in organic products?

There was a very wide range of suggestions of factors that could be inhibiting the development of a single EU market in organic products. However, there were also voices saying that there is no problem at all and that it is premature to ask that question since new EU-wide legislation applies only from 1 January 2009.

Many comments focused on the consumers and their lack of information in general. Other comments indicated that consumers tend to associate organic production with local production and that they really prefer local or regional produce. Supplying local market is more in line with the organic idea (protecting the environment).

Many contributions also mentioned the difficulties linked to the still small scale of production explaining that the local market is more in reach. Another great obstacle identified was the lack of one well-known logo – even if opposed by others. The foreseen ECO label on food would be a threat for such a logo. Other comments, often coming from new Member States, were that the organic market is not structured enough in some places (lack of distribution channels, little interest of the processing sector...)

The organic trade indicated the many different private organic standards – only recognised in one Member State – as a potential obstacle to trade as well as local, regional or national origin denominations.

There were quite a few comments on the lack of common rules in the EU and the problem of different interpretations of EU legislation. Many comments, in majority from Spain and Italy, underlined the need for improved controls.

There were some voices concerned about imports, saying that controls and certification should be the same as in the EU.

Answers could be structured by looking on the different important players and structures for the organic market, but since the organic market is differently structured in the various MS or regions of the EU, some attention needs to be given to the

geographical origin of the comments. The different comments can sometimes be opposing each other due to the different structures and their therefore different implications for a single market.

Consumers

Many comments focus on the consumers and their lack of information in general, but also in particular.

Some of the comments were:

- Lack of coordinated information towards the consumer
- Huge imbalance between conventional, integrated and organic agriculture, advantages of organic production should be made more visible, its effect on the environment should be acknowledged and objective information given to consumers
- Lack of information on health risk and benefits
- Confusion about what organic stands for - experience from local milk being understood as "organic milk" and thereby capturing sales from organic milk
- Lack of coordinated marketing support and interference by the EU often deferring consumers - only old guidelines in EN, leaflet on EU Regulation refers to old legislation

More information can lead to more consumer confidence in organic production and control. Some comments were that there is a general lack of consumer confidence, some were indicating that consumers have doubts about the controls in and outside the EU that consumers wonder whether the controls are sufficient or think that there are no independent controls.

Other factors when looking at consumer confidence were:

- The different organic standards could be misleading consumers
- Lack of transparency
- Lack of consumer confidence - due to long supply chains
- Consumer and organic production are too far away from each other
- Lack of scientific prove in order to promote the different qualities of organic products
- Scandals due to not adapted control and vigilance and fraud

- Production along motorways

There can also be found comments concentrating on the different requests by consumers and that consumers might think that the certifier is more important than the producer.

Others focus on the quality and the price of organic products:

- The difficulty of communication comes from a confusion of the production method and the quality of the products
- Consumers do not want to pay higher prices
- Quality is not always according to price premium - there is an unjustified gap between what the consumer pays and what he gets
- Different production methods lead to different qualities
- Prices cannot be controlled
- Prices of organic products and the competition from other alternative products
- Financial crisis is greatly affecting the consumer
- Lack of demand
- Lack of purchasing power in a part of the EU
- Organic production of wine does not guarantee quality - important to consumers
- Organic production of wine is not recommended - it will only confuse the consumer

There is quite some concern about GMOs and whether it will be possible to keep them out of organic products. Many are concerned about the GMO threshold of 0,9% and that EU legislation accepts contamination with GMOs in organic foodstuffs.

Some comments were:

- The GMOs will kill organic farming
- The discussion on GMOs will harm the organic sector, when the "green genetic technique" will be introduced in the whole EU. This will be a main obstacle for further development

Other comments indicate that consumers tend to associate organic production with local production and that they really prefer local or regional produce. As demand is regional, distribution should be regional too. There should not be any long transports, which can harm the environment and which will cause externalities for society.

Supplying local market is more in line with the organic idea (protecting the environment). One comment was also that there is a lack of indication of origin.

When looking on how the consumer can identify organic products and on the organic labels, a range of different comments are suggesting different obstacles. Particularly the lack of one logo or that it is not known, but also that it is generally difficult for the consumer to identify organic products. One great obstacle identified is the foreseen ECO label on food with its higher environmental requirements.

Some other comments:

- Consumers cannot understand many different logos - use of private/national logos
- Current situation with several logos may disturb trade and mislead consumers
- Change of logo
- Different private logos with their different guaranties of higher standards could harm the credibility of the official EU logo
- Obligatory EU logo is a threat to private logos
- There are new higher requirements on the other products
- It is catastrophic with the different nearly identical EU logos. They are very unattractive (one even symbolising a virus). They do not even follow minimum marketing standards.

Organic production

In connection with organic production and the growing demand of organic products there were described different obstacles why it seems to make it difficult to persuade more farmers to convert to organic production:

- Lack of information - producers
- Technically difficult to produce in an organic way
- Current farming technologies
- Too many different requirements
- Bureaucratic quality schemes are an impediment
- Organic production is difficult
- Organic poultry production is difficult
- Not enough methods for biological plant protection

- Increasing specialisation of farms
- The climate
- Production costs
- Higher production costs, because of the requirement of traceability
- Certification costs
- Overall costs
- Low cost-effectiveness
- Less productivity

Some say bad politics (on policies, subventions, coherence, public information) are inhibitors for the development of the single market. Where others think as long as there is no proven benefit of organic production there should not be spent any EU money on it.

Other comments on that line are:

- Lack of commercial strategy and most importantly of incentives
- Lack of adequate rural development policies - organic production method is in a crisis
- Development funds are missing
- Lack of coordination between supply and demand - planning together
- Too few incentives for farmers to convert
- Producers quit when they do not get more subsidies
- Lack of economic incentives to convert big areas
- The pressure on land and the slowing of prices
- Price speculation

Many have been commenting on the difficulty of the still small scale of production and that therefore the local market is more in reach.

Other comments often from new MSs, were the market structure for organic production has not yet developed were:

- Lack of marketing strategies for small scale economies
- Not enough produce
- Small producers - manufacturers and growers
- Lack of cooperation between farmers
- Small number of producers
- Small production area

- Only few products of flawless origin and quality
- There are too many non-reliable products on the market
- Varying quality and quantity
- Lack of organic feed
- Local and climatic differences
- Only few services for distribution
- Differences in distribution
- Present support system helps producers, but not traders
- Lack of distribution channels - organic market remains very fragmented
- Transportation problems
- Little interest of the processing sector
- Farmer has no incentive to sell his produce directly to the consumer

Many from the farming sector are complaining about different factors that cause distortions of competition in the different MS:

- Different support in MS
- Different application of legislation in MS
- More restrictive national rules
- Minimum EU standards and the possibility of applying stricter rules
- Differences in standards from country to country
- Poor regulation of organic poultry and egg production
- Different certification costs
- Too few control bodies on the market
- As other factors inhibiting a single market for organic products were mentioned: (not sure why??)
- West European agricultural organisations
- Food lobby

Organic trade

There are different factors in organic trade that had been commented one is the increased protectionism through local, regional or national origin denominations, the other is the many different

private organic standards that might be an obstacle of trade.

There are different often opposite opinions on what is really the problem:

- Barriers come from the basic law on certification and lack of compliance with community organic production
- No sufficient guarantees for the consumer by the Regulation
- Different requirements/standards in the EU
- Private certification bodies should not be allowed to have additional requirements
- One single certification process cannot fit to all circumstances
- Private standards should be allowed, but they and their different logos will not encourage a single market
- Certification in one MS is not recognised in another - recertification to other private standards necessary
- Arbitrary behaviour of some MS with their in "gold plated" standards where common EU standards should be enough

Other comments concern the competition of organic products:

- Competition of organic products with each other - similar products
- Competition with traditional products
- Competition from other certification schemes e.g. "natural production"
- Overlaying commercial schemes competing with each other
- Many commercial schemes with their own rules and costs
- Strong position of different marketing organisations in the MS
- Multinationals have too many requirements
- Conventional food chains and the multinationals
- As long as traders prefer their national certification body, there will be no free trade

There were only a few concerns about imports from third countries particularly from China and South America (Brazil) where consumers lost their confidence.

There are some voices concerned about:

- Cheap produce/raw materials from third countries
- Imports in the EU are too difficult (complex)
- Lack of import controls
- Control and certification should be the same as in the EU
- The European requirements have been changed frequently. As a result quite a few producers have given up organic production"

Organic legislation

There are quite a few comments on the lack of common rules and that the new Regulation should have improved the situation, but that some MS want to keep their own rules particularly their private rules. Many see a problem with the harmonisation of production rules in the EU, which could also be the same comment that there are different interpretations of EU legislation.

Other comments on that line were:

- Too much flexibility from one to the other country
- By accepting lax standards
- Lack of harmonisation of glasshouse cultivation - NL glasshouse horticulture cannot be called organic (should we write that ??)
- Problem with the definition of additives coming from natural sources - the production might not be organic

Lack of controls, lack of independent or weak controls, lack of harmonisation of controls, certification and sanctions are of great concern. Even though one comment from one authority was that older MS have an advantage that they are more in compliance, many of the concerns on control come from Italy and Spain.

Other comments on this issue were:

- Problems with control of non-authorised products
- Commission did not continue supervision of national control systems
- Inadequate control of the whole production chain - particularly outside the EU
- Requirements and control should be the same in and outside the EU

- Greater demand might decrease consistent monitoring and supervision
- Lack of communication between certification bodies

There are a few comments on the lack of some EU legislation still to be adopted on some grey zones, as for instance for wine, caterers, rabbits etc.

As for wine:

- The incoherence of the CMO for wine and organic farming
- Problem with names of organic wine

How can the single EU market in organic products be made to work better?

Many contributions suggested that there should be significantly more promotion towards consumers: public and private, with EU giving support to stakeholder promotion campaigns and education of stakeholders on promotion.

Protecting high confidence in organic products would also be important. To strengthen consumer confidence, it would be essential for different private standards to be completely transparent. Private labels should be able to demonstrate their additional claims.

It was suggested that there was a need for a new development plan or a complete implementation of the action plan. It was particularly suggested by the new Member States to support the development of an organic market, strengthen marketing and create better conditions for distribution channels, in order to reach all the shops.

It was also suggested to develop a common system for the operation of an organic market with well-established import controls and information mechanisms.

The trade sector suggested that the EU monitor the derogation granted by the Member States, in order to avoid distortions of trade.

The need to check the functionality of the new legislation before taking up new issues was also mentioned. It was emphasised that the Commission should work closer together with professionals and stakeholders that work on a national level. Harmonised interpretation of EU legislation would be needed. It was suggested that there should be a better cooperation

between the authorities of the different Member States.

Another important issue was the improvement of control systems and their auditing both by the MS and by the Commission. There were many different suggestions ranging from centralised controls at EU level to controls by private bodies that need to be EN 45011 accredited.

Consumers

Many suggest that there should be much more promotion to consumers - public and private and that the EU should give support to stakeholder promotion campaigns and education of stakeholders on promotion.

More specific was suggested:

- EU-wide promotion campaign of sustainable agriculture with a clear explanation of all criteria, requirements and use of inputs in organic farming, but not only on organic farming
- More subsidies for the promotion of organic production to producers and stakeholders
- More information on the external costs of other products in respect to the environment and health
- Environmental groups should stop advertising – consumers do not trust them
- More information to the consumer about quality - what is truly organic
- Adapted promotion, organic should be defined the same way everywhere, productive, but respecting the environment and healthy processing. This should be underpinned by research.
- More information on packaging counters

Protecting high confidence in organic products is important. It is one of the key elements - consumers have to be sure of high standards. To strengthen consumer confidence it is essential that the different private standards must be completely transparent. Private labels must be able to demonstrate their additional claims.

Suggestions along that line were:

- Consumer confidence depends on the credibility of the standards and the controls

- Control and certification needed - only certified products should be sold as organic
- International cooperation between control bodies and competent authorities to avoid fraud
- Organic production and consumption should develop together – closer ties should be promoted between producers and consumers
- Active consumer organisations

Local products are very important to the consumer. Products should come from their own country. It was suggested that it would be better to envisage a regional than an international market.

Additional comments and suggestions:

- Favour seasonal and local consumption
- Support local production in line with sustainable development
- Organic produce should only be traded local or regional, to trade commodities further away is against Article 3(a)(iii) the responsible use of energy. Organic produce traded further away should therefore be more expensive - radius not more than 200 km
- Only producers that produce environmentally sustainable should be allowed to be organically certified
- Standards for environmental and animal protection
- By obliging production systems to be sustainable
- Production and consumption should in principal be local, if transportation needed the product should cost correspondingly more
- Value the regionalisation of production - organic and origin should work together to win over more credibility
- Should there be only one organic market? Transport over long distances is not coherent with the organic principles of taking care of the environment – producers should have to make a CO₂ balance of their production
- The main challenge is to improve the organoleptic quality of organic products
- New rules on organic products and their origin are bad, products which are only to 50 or 70% organic must not be considered organic

Consumers are very concerned of chemicals and GMOs, therefore it was suggested to forbid all

chemicals and GMOs in all agriculture and to enforce controls and sampling.

Other suggestions were:

- No GMOs should be allowed at EU level
- Delete 0,9% GMO threshold

There can also be found comments concentrating on the different requests by consumers. It is suggested that the market will only develop as much as it is meeting the expectations of the consumers. As they are different in the different MS, different national rules should be allowed.

Additionally prices are still also an important issue:

- Reduce tax on organic products or think of other incentives to keep consumer prices down

There is a strong position for only one organic logo in all MS and against using additional national or private labels. It is suggested, not to use the ECO label on non-organic food, which is considered to be against the EU organic Regulation.

Further comments on the use of logos and labelling:

- Introduction of a logo for sustainable production instead of the ECO label
- Private certifying bodies should not be allowed to advertise their own brand on the products they certify
- New EU logo should be created quickly - be attractive, practical to be used in all languages, easy to recognise
- Launch, support and promotion of one obligatory logo
- Logo with the indication EU organic / non EU organic - and indication of origin for ingredients
- By putting in place a regime of coexistence of clear logos - European/national
- It is important that the consumer knows the Commission's role in making a new EU organic logo
- No further logos - do not change logo again
- Adopt German Bio seal would be most efficient - wide known
- Better marketing and labelling
- Would be good, if it would be allowed to label food that is compatible with organic as "organic food"

- Important to defend the organic labels against other misleading labels
- International cooperation to address derivatives besides the organic Regulation should be improved

Organic production

In connection with organic production and the growing demand of organic products there were described different obstacles why it seems to make it difficult to persuade more farmers to convert to organic production. There are different suggestions what could be done to improve the situation.

It is generally suggested that farmers should be more trusted than certification schemes, which do not necessarily support good organic farming practices.

Besides more promotion to farmers and an increase of their benefits, the following suggestions could be noted:

- Focus on producers (subsidies, communication) - incentives to go organic
- Legal base should be more strict with more variation
- Farmers and producers need a simple text, new brochure with examples needed
- Lower administration costs: simplify quality schemes, cut amount of required documentation
- Single registration scheme - registration costs should not be a burden
- Minimum risk levels should be set
- Technical support and research – e.g. develop better biological defence agents
- Codex alimentarius should apply also to organic technical information - will be more useful and will increase the profitability of organic farming
- By boosting demand
- Support public subsidies to farmers to keep prices on a reasonable level and to allow conversion
- Area-based payment is not efficient, support for products would be more efficient
- Support the building of organic enterprises - help producers
- Support building of networks - unite producers

- Role of producer organisations should be reinforced
- Subsidies needed to cover the high costs of bakeries
- Encourage organic production in the most preserved regions
- Financial support needed to cover the investment and the risk of conversion
- Financial support for certification and supervision of production/processing
- Organic farming should be economically sustainable
- Enlarge organic acreage
- Cost ability to meet demand
- More subsidies to facilitate conversion
- Abolish all subsidies and environmental payments in the EU
- The same subsidies to all organic farmers
- Harmonised application of rules
- By correctly applying the harmonised rules in certification and control
- Allow group certification
- Harmonise the conditions for certification, for example in collectives

It is suggested that there is a need for a new development plan or a complete implementation of the action plan. It is particularly suggested by the new MS to support the development of an organic market.

Following suggestions down that line:

- More dialog and cooperation between the organic stakeholders
- More coherence with EU rural development policy
- Without promotion, communication, training and subsidies the organic market will get worse
- Research and development projects - public and private
- EU-wide network agency
- It would be worth it to make a impact assessment on organic farming on society costs and benefits
- It is not up to a government or the EEC to favour one production method over the other

- Stop supporting just one production form and opposing another. Every production form must have its place. They are complementary and will find a balance on the market themselves
- Important not to promote one system over the other

Organic trade

There are different suggestions on whether or not there should be private standards, which could be an obstacle for trade in the EU. It is also suggested that the EU should monitor the granted exception by the MS to avoid distortions of trade.

Suggestions are the following:

- Leave market alone
- No private standards - organic farmers should harmonise their standards
- When MS are delegating organic certification, then they should prevent the private control bodies from increasing requirements and thereby costs
- Harmonisation of the different private certification schemes and their recognition of each other
- Minimum standards should be implemented in the national certification schemes
- Do not create stricter nation rules that will rise costs and will create new distortions in the EU
- Private standards are important for the development of organic farming
- Organic certification in one MS should be valid in all MS, just as a drivers licence
- The regulation on organics could be incorporated into the GlobalGap - would simplify regulation and improve integrity
- Be careful with parallel private accreditation
- The marketing of products should be controlled just as the production - control of all stages of production

It is strongly suggested to strengthen marketing and to create better conditions for distribution channels. Many of these suggestions were from our new MS. But also old MS are asking for a better structured market by better organised distribution chains particularly long chains, in order to reach all the shops.

Several suggestions were:

- Sector needs more integrated supply chains
- Reflect on the structure of marketing chains
- Support the development for cooperation of small farms, as well as collective harvesting and distribution
- Supply and logistics need to be improved across the entire production chain
- Market presence of producer organisations should be expanded
- More organised chains of production
- Development of coherent long-term policy strategies to encourage further supply Information system allowing European exchange of organic products, more organic products should be used in organic production and less conventional

It is suggested to develop a common system for the operation of an organic market with well-established import controls and information mechanisms.

However, different suggestions on imports could be noted:

- Reduce imports - facilitate conversion to avoid competition with organic products from third countries
- Supervision of the control system in all MS needed particularly for imports
- Same control standards and frequency in third countries
- Equivalence of imported products must be guaranteed
- Reliability of controls, particularly for foreign products
- Products from third countries should be controlled just as often and as thoroughly
- All EU countries and third countries should have the same certification and control standards
- Certification and importation should not be unnecessary complex
- Simplification of import rules
- Requirements for imported products should not change more often than every 5 years

Organic legislation

New Regulation seems to be easier to implement, was one comment, another was that it is necessary to regulate better. It could mean that there is, as also expressed, a need to check the functionality of the new legislation before taking up new issues.

However, there were suggestions on new issues:

- Plastic wrapped products and non-recyclable packaging even if it is pollution free should be discouraged - buying wrapped products should be more expensive than buying from the counter
- Develop all policies of quality food products according to sustainable development
- Harmonisation needed in aquaculture and wine production
- Common standards for processing needed
- In the elaboration of the rules for organic wine the compliance with the specific regional characteristics must be ensured, just as in the CMO of wine specific zones are defined
- For the development of organic wine, the development of rules and controls respected by the chain are necessary - standards should be supported by "The International Organisation of Wine and Vine"
- No products should be allowed outside the scope
- Enlargement of the scope to catering and non-food products e.g. cosmetics
- Bio-dynamic farming should be legally acknowledged at EU level and its development should be supported

It was suggested to wait and see the effect of the harmonisation of rules to be applied from 2009. However, when working on new common EU standards, amending 889/2008, it is emphasised that the Commission should work closer together with professionals and stakeholders that work on a national level. The Commission should publish plans for how to change 889/2008 and a blog on the website so regional and national stakeholders can come with their comments. Roots of organic production should be respected, consumer perception is not the same in all MS.

The following suggestions were made:

- Complete harmonisation of the requirements and application for the production and the processing in all MS

- Harmonisation of control of storage is needed
- Complete harmonisation of certification requirements - should not be higher than EU Regulation and not different from other MS. Avoid these differences due to subsidiarity in the new rules
- Simple code to the highest not to the lowest standard
- Harmonise rules in the EU - common EU standard should be valid everywhere
- Overall parameters should be defined at EU level, but many requirements should be set by MS
- Harmonisation of poultry rules - certain technical provisions in the legislation need to be improved, e.g. the definition of slow growing poultry strains.
- Use the help of experienced organisations

Harmonised interpretation of EU legislation is needed. It is suggested that there should be a better cooperation between the authorities of the different MS. EU should support a forum where MS can meet and discuss the implementation of the different rules. Necessary to improve information exchange between MS.

Another important issue is the improvement of control systems and their auditing both by the MS and by the Commission. There have been many different suggestions all from centralised controls at EU level to controls by private bodies that need to be EN 45011 accredited.

More suggestions along this line:

- Improve control systems by simplification and harmonisation
- More efficient and independent control
- Control by public authorities might be the solution
- If a MS is delegating certification authority to a private certification body, it should prevent that body from increasing certification requirements"
- Certification and control system should be centralised at EU level
- Only EU control or a provision on mandatory national controls
- Harmonisation of certification in all 27 MS

- Organisation of certification should change every 2 years to ensure credibility
- Cooperation between the competent authorities and the certifiers
- Control bodies should be independent without relation to the controlled operators EN 45011 accredited
- Only products certified by accredited control bodies should be allowed to be labelled as organic - EN 45011 or EN 17020
- It would be better, if the control bodies were audited by the Commission, and if they had to respect the European standard EN 45000
- Certification body accredited in one MS must be able to operate in all other MS
- Harmonised sanctions in and outside the EU
- More resources for surveillance
- More intensive exchange of information between MS necessary

Other comments to question 12

Many other comments were made related to organic farming while often not directly related to the functioning of the single market.

In particular, Genetically Modified Organisms (GMOs) were regularly mentioned. Fears were expressed that GMOs may destroy the organic farming sector.

No changes/measures necessary:

- After the changes in 2007 no other changes are necessary
- No factors known
- Development of organic should be left to the "invisible market hand"

On the further development of organic farming:

- Development of organic farming should have high priority
- New Agency for EU organic production should be created
- New organic action plan from 2013 with indicators and budget
- One essential problem is the lack of cooperation of between the competent authorities for

organic. A special coordination committee should be created at EU level including market actors

On the term one single market:

- To talk of a single market in organic farming is an insult
- Organic products compete with regional and local products. Its rather about consumer perception than about facts
- Important that the common organic market will not destroy the local organic market
- Preference for local, regional or national or EU products should not be considered an obstacle to develop one single market. It is the consumers choice the market is trying to respond to

On fraud:

- EU consumers trust organic products
- Important that the organic products do not loose credibility, growing demand could increase risk of fraud
- More and more fraud is noted
- Monitoring organic production is important and cooperation between the monitoring bodies needs to be increased

On GMOs:

- Threshold for GMO has harmed the sectors image
- Region Wallonnie is against the tolerance of 0,9% GMOs in organic produce when it is incidental and technical unavoidable
- Cases should be established against GMO

On organic imports:

- Developing the single organic market could also favour massive imports, which would not solve agri-environmental problems in Europe
- When the place of farming has to be indicated then there is a risk that imported organic products will be rejected by the consumer without any reason

On EU organic legislation:

- 834/2007 and 889/2008 should be understood as minimum requirements
- 834/2007 and 889/2008 should not be perceived as minimum requirements, the rules are quite clear

- Inspection bodies should be able to set additional standards, important for the development of future legislation
- General need to improve the Regulation, while maintaining highest organic farming standards
- The Regulation in force allows certain flexibility, which includes derogations from the production rules
- Although the Commission may set specific conditions for the application of these derogations, it is not excluded that their application is different depending on the country of production
- It seems that there are different levels of organic farming

On the situation in the UK:

- Retailers in the UK have responded to consumer demand, market has grown significantly during the last years without intervention of the EU. Difficult to see what the EU could do further
- Recent promotion campaign did not have any effect in the UK, as consumers are making their choices on the basis of quality, added value and provenance
- Market has grown because of consumer demand – retailers have worked with suppliers to ensure they source products to satisfy the rapid rise in demand
- Retailers in the UK do not support the use of a mandatory logo under the new Regulation. Consumers will not know what it means and it will only add to the clutter on labels.

On food safety:

- Organic products should not get exceptions from normal requirements on food safety, environment and animal welfare
- Organic products get economic support. It is the aristocrats in Brussels that are because of their etiquette promoting one type of production. This is not acceptable because: people who buy these products are not from the poor or the middle class of the European citizens. On top of that the quality of these products are not without risk, e.g. micotoxines in cereals or the illnesses of the pork (remember why the Moslems do not eat pork) If we continue like this, we will get serious sanitary problems, less products to nourish the Europeans, we will get dependent on third countries and of course

dependant on climate conditions. We want to ensure that we can feed the European citizens, but we will just gain the opposite. Sorry, but this is governmental interference.

Coordination with other standards:

- The organic and IG standards must be coordinated
- Would be important to clarify the compatibility of eco label for food with requirements of organic products

On pesticides:

- The EU is going against its desired direction by imposing the registration for all pesticides thereby favouring big companies and diminishing the number of possible products
- Integrated Pest management/integrated crop management are one of the best available tools to ensure sustainable agriculture

1.13. Question 13

To what extent has use of the graphic symbols for the EU's outermost regions increased awareness of products from the outermost regions?

Contributions underlined the limited awareness of consumers and the fact that the logo is not noticeable on their territory.

Several contributions suggested communication campaigns to better inform consumers.

How should these initiatives be developed in order to increase the volume of quality agricultural products originating from the outermost regions?

Several contributions suggested that this scheme would be more relevant to consumers if it had a strong message or offered them added-value, which could be fair-trade, quality or taste.

Some contributions also suggested that GIs should be encouraged in this context while others underlined that a clear marketing strategy would be more effective.

Collective promotion actions should also be put in place.

1.14. Question 14

Are there any pressing issues for which existing schemes and arrangements are inadequate and for which there is a strong case for an EU level scheme? Should the Commission consider mandatory schemes in certain cases; for example, those with a complex legal and scientific background or those needed to secure high consumer participation? If so, how can the administrative burden on stakeholders and public authorities be kept as light as possible?³

The majority of respondents was against introducing new EU schemes (although some made specific reference to mandatory schemes and did not express their views of voluntary schemes – see footnote). Some saw possibilities for new schemes if certain conditions are fulfilled, and one fourth were of the opinion that new schemes would be needed in certain policy areas.

Only among regional/local authorities, retail organisations, and environmental NGOs was there a majority of view that new schemes would be useful. Consumers were evenly split between proponents and opponents of new schemes.

Some respondents proposed criteria for deciding whether a new scheme would be needed or how it should operate, e.g. if there is a threat to the functioning of the single market. Suggestions were also made on what to do instead of developing new EU schemes (e.g. simplify and/or harmonise existing schemes).

Some respondents also made suggestions of issues that should either be addressed in the context of a new EU scheme or for which common definitions at EU level (not necessarily through a new scheme) would be needed.

Arguments against new schemes include:

- Additional new schemes would confuse consumers;
- Quality issues should primarily be in the hands of private operators; schemes will develop as

private initiatives, no Commission involvement is necessary. The market is more flexible and responsive to develop products according to consumer demands, without excessive bureaucracy;

- New schemes are not compatible with "better regulation" principles;
- (proliferation of) certification schemes are (is) costly for small-scale operators; scheme participants have no advantage in the market
- current schemes are already above international market standards
- legal minimum standards must apply to all products and should not be covered by a scheme; mandatory issues to be addressed through legislation and not through a scheme
- there is no scientific basis for any new scheme
- there is a danger that schemes and labels are seen as a way to raise production standards
- Against an EU-wide scheme for products from "high nature value areas" which would be too complex and costly to administer, with limited consumer interest in an EU-wide label for such products

Some respondents proposed **criteria for deciding whether a new scheme would be needed or how it should operate:**

- only take action if the size of the problem justifies the additional administrative burden
- only take action if private initiatives threaten the functioning of the single market
- any new scheme should be science based
- new schemes should not hinder the functioning of the internal market
- schemes with complex legal and scientific background should be governed by uniform regulations at EU level
- any new scheme must correspond to policy needs
- before developing any new scheme, first do an in-depth consumer study
- try to develop coherent, comprehensive schemes
- need simple and effective schemes with full transparency, assured through participation of farmers in the definition of rules

³ Please note that the three sub-questions were in general perceived as one single question. Some respondents refer specifically to the need of a new mandatory scheme, while in the majority of cases it is unclear whether respondents mean voluntary or mandatory schemes.

- new schemes should not lead to higher production costs, certification expenses must be shared by the entire sector; limit costs by facilitating grouping of producers; adapt scheme requirements to enterprise size
- Don't include general management practices in certification schemes which makes them too complex
- preference should be given to labelling of single issues (animal welfare; mountains) rather than complex issues (organic)
- use "Système de Garantie Participatif"
- mandatory schemes should be reserved for food safety or health issues

Suggestions were also made on **what to do instead of developing new EU schemes:**

- Simplify and/or harmonise existing schemes; increase scheme transparency; integrate new criteria into existing schemes
- Introduce fewer but horizontal controls based on risk analysis
- better connect quality systems and official inspections as well as various types of F&V inspections; take scheme participation into account for the allocation of subsidies
- Develop agreed guidance documents for important policy issues (e.g., health, environment, animal welfare, fair trade, traditions, regionality)
- Give more visibility to sustainable and organic agriculture
- The EU should allow labelling schemes (e.g., conservation grazing) to be supported by the Member States and exempt from the requirement for State Aid notification where the protection of the environment is a primary aim
- Focus more on co- or self regulation and consultation and avoid schemes which have no scientific basis and mislead the consumer
- use local administrations for recognising local products, free certifications by local authorities
- improve communication about existing quality measures and schemes before starting new schemes
- Develop a global / comprehensive horizontal approach to quality products rather than multiplying schemes;
- start discussion on sustainable development at EU and global level; develop an integrated approach to sustainable production
- Develop different national criteria and actions in order to promote the consumption of local and regional foodstuffs
- harmonise legislation in MS on integrated farming
- integrate and reduce certification burden for food producers
- develop guidelines for the auditing of certification schemes;
- establish a standard product nomenclature where a product name does not mislead the consumer through similarity with the national name of the translated version (e.g. "szalámi" (salami), "kolbász" (sausage), "párizsi" (Lyoner sausage), etc.
- animal welfare rules lead to competitive disadvantage for EU farmers and should be accompanied by a ban of non-complying imports
- begin by enforcing existing rules, e.g. on animal welfare
- harmonise labelling rules on non-GMO products
- integrate rules on environment, climate change and ethical issues in baseline requirements;
- establish observatory on evolution of agricultural practices
- minimum standards that are not met should be mentioned on the label;
- extend the scope of Regulations 509 and 510 to cover all products

However, some respondents also made suggestions of issues that should either be addressed in the context of a **new EU scheme** or for which **common definitions at EU level** (not necessarily through a new scheme) would be needed. These include:

- Integrated farming/integrated production
- Environmentally friendly products / use of pesticides; biodiversity; water preservation
- Products making full use of local sustainable resources (water, feed, etc.)
- EU sustainable agriculture label
- Products from high nature value farmland (reserved for small-scale producers)

- Common definitions for the terms "mountain", "island" and "alp"
- Animal welfare
- Climate change / low carbon emissions / energy use of production and transport
- Superior product quality (similar to Label Rouge)
- GMO-free food / GMO- free feed
- Products from national and/or regional parks
- Local traditional products / typical products from a specific region
- Compliance with EU farming requirements
- ethical and socially responsible criteria especially for small-scale producers
- worker welfare scheme /social criteria of production
- stricter organic livestock regulation
- a scheme for products from local breeds / protection of local breeds / products from animal breeds in danger of extinction
- a scheme for sparsely populated regions with a low economic activity and unfavourable agro climatic conditions
- bio-dynamic farming
- EU basic, EU extra and EU superior quality
- A framework communicating quality parameters from feed to food
- harmonisation of requirements for temperature of storage and transport of foodstuffs
- health
- (country of) origin; EU origin
- mandatory labelling of farming methods for meat and dairy products

Other comments:

- Several respondents expressed their **worries about an extension of the Ecolabel** to food or processed food products. Most of them felt that this would lead to confusion with the organic agriculture label.
- Other respondents also stated the need to clarify the relation between organic farming and the proposed animal welfare label and to have the new EU organic logo as soon as possible.

- One respondent regrets that the EU hasn't waited for the outcome of this consultation before changing the PDO logo
- Rapid change in distribution channels leads to less local consumption; non-organised small-scale producers search for ways of getting a fair share of the value added for traditional and innovative products

1.15. Question 15

To what extent can certifications schemes for quality product meet the main societal demands concern in product characteristics and farming methods?

A majority of respondents supported the idea that food quality certification schemes (FQCS) structure the demand, create confidence or increase it on the market, especially between farmers and consumers. Moreover, private schemes are more flexible, can rapidly adapt to new criteria, are more open to societal demands, e.g. kosher or fair trade and create added value.

There were frequent references to the usefulness of FQCS for geographically marginal areas, as well as references to organic labelling or (French contributors) to Label Rouge, seen as an exemplary case of strong link from producers to consumers.

Producers were more reluctant to responding to new demands. Certification should aim more at providing information than at improving quality according to them. Development NGOs mentioned that it would help opening the EU market to producers from developing countries. Consumers objected that it was not logical to answer societal expectations through labelling. FQCS were efficient only when and if control would be independent.

To what extent is there a risk of consumers being misled by certain schemes assuring compliance with baseline requirements?

The schemes assuring compliance with baseline requirements should only be used in business to business operations and not communicated to the public. They could create confusion and mislead consumers. A risk of confusion between private labels and public ones was mentioned as

well as the fact that too numerous FQCS would create confusion.

National authorities and consumers in particular considered that FQCS should go further than minimal requirements, and that baseline requirement had to be controlled by public authorities. There was a risk that consumers would believe that only the labelled products fulfil the minimum requirements, whereas all do so.

Retailers supported the idea that one should communicate only when there is a real added value.

The need of complementary information to be given to consumers (Internet was mentioned as a possibility or information campaigns) was also mentioned.

What are the costs and benefits for farmers and other producers of food (often small or medium-sized enterprises) in adhering to certification schemes?

Greater added value and better market access were mentioned in a majority of contributions as a benefit for farmers and other producers of food.

Benefits mentioned included: it was a good way to fight unfair competition and to help structuring the food chain; if the schemes were well managed, costs were limited and profits might be important (trade organisations).

There was an added value expected as well through product advertising, fame, promotion. SMEs have more difficulties; FQCS gave better confidence to consumers, allowed harmonisation for international trade and more transparency (processors).

Costs mentioned included: private controls were very expensive; too many FQCS would lead to confusion; multiplication of criteria meant high costs; procedures, multiplication of controls (farmers' organisations); constant evolution of societal expectations made it difficult for producers to follow and adapt; adhering to FQCS meant additional costs and not adhering to them meant being excluded from certain markets.

Should a more active involvement of producers' organisations be promoted?

All responses were positive except from 4 contributors (3 consumers and one academic) who feared that this would lead to conflicts of interest.

Other comments included:

- producers' organisations should especially care for the defence and grouping of small producer's and small productions, regroup supply;
- they have to act as a rebalancing factor in front of retail; they have to act in informing general public on products as well as on production methods;
- they have to act concertedly with consumers and public authorities;
- they should be supported from EU funds; they should be independent;
- they have an irreplaceable part to push towards simplification of the system;
- They can contribute towards reducing costs (mutualising expenditures); they can mobilise and organise supply.

Few answers from new Member States mentioned the weakness of such organisations in their agriculture.

1.16. Question 16

Could EU guidelines be sufficient to contribute to a more coherent development of certification schemes?

The majority of respondents was of the view that EU guidelines would be sufficient to contribute to a more coherent development of certification schemes.

This opinion was most pronounced among national/regional authorities; the farming community; processing organisations; consumers and general public (even though a sizeable number here thinks that guidelines are not sufficient); and academic organisations. Somewhat more undecided are trade organisations and environmental NGOs, but overall numbers of respondents in these categories are small.

Respondents who disagreed with the idea of guidelines either thought that guidelines were not sufficient and stricter measures (legislation) would be necessary (an opinion most pronounced among the consumers and general public group); or they thought that not even guidelines would be needed since the market was capable of solving the problem without any sort of official intervention (most prominent among the farming community). The latter group pointed to ongoing harmonisation initiatives in the private sector or at the international level which would make EU involvement unnecessary (some even said that EU guidelines will do more harm than good).

Criteria mentioned most frequently for inclusion in guidelines are:

- guidelines based on international standards (ISO 17000 Series and EN 45011);
- respect of international obligations (WTO);
- harmonisation of accreditation, certification and control procedures and requirements among Member States;
- independent certification by accredited bodies;
- internal audit of schemes;
- scheme specifications should be based on objective and scientifically sound criteria;
- scheme specification should be publicly available;
- involvement of stakeholders in scheme development;
- openness of scheme to all producers;
- make special arrangements for small-scale farmers and producers;
- scheme requirements should go beyond legal baseline.

Other comments made in this context refer to the need to spread cost of scheme participation between all actors in the food supply chain, and the need to consult widely and internationally for the development of guidelines.

1.17. Question 17

How can the administrative costs and burdens of belonging to one or more quality certification schemes be reduced?

The most frequently mentioned suggestions for reducing the administrative costs and burdens of belonging to one or more quality certification schemes can be grouped into ideas related to the further development of schemes: (e.g. mutual recognition), ideas related to the certification and control process: (e.g. group certification; combine audits; encourage competition in certification market), ideas related to financial support of scheme participants: (e.g. provide subsidies for small scale producers; tax returns; certification by public authorities for free) and ideas related to information and communication: (e.g. inform consumers about scheme benefits so that they are willing to pay higher prices; common platform for farm background data).

- **ideas related to the further development of schemes:** encourage mutual recognition of similar schemes; develop one comprehensive scheme that makes all others redundant; involve farmers and producers in scheme development ;
- **ideas related to the certification and control process:** use group certification for small-scale producers; combine audits for different schemes in a single combi-audit package; take scheme participation into account for the purposes of official controls (e.g., for cross-compliance); encourage competition in the certification market to drive prices down; use royalty system to shift costs from small to large producers;
- **ideas related to financial support of scheme participants:** provide subsidies for small-scale producers participating in certification schemes (e.g., through Rural Development or promotion programmes); give tax returns (fiscal incentives) to producers participating in certification schemes; certification of small-scale producers to be done by public authorities (for free); waive certification fees for producers from third countries; make sure that the value added through scheme participation goes to the producers rather than to the certifying bodies;
- **ideas related to information and communication:** inform consumers about scheme benefits so that they are willing to pay higher prices; develop common platform for background farm data to be used by all certification and control bodies; use better IT-programmes; establish online consultation with certification body

Some respondents stated that since schemes are private, participation is voluntary, and schemes

will only survive if benefits are greater than costs.

However, other respondents felt that the EU has no business in interfering with the costs of these private certification schemes. Since schemes are private, participation is voluntary, and schemes will only survive if benefits are greater than costs. It was also mentioned that downward price pressure among certification schemes can lead to poor inspections and loss of consumer trust.

One respondent pointed out that it will be difficult to mutually recognise the individual quality characteristics of private certification schemes (which can be very different).

1.18. Question 18

How can private certification schemes be used to assist EU exports and promote European quality products in export markets?

The majority of the respondents were in favour of receiving assistance to export EU products. They stressed the need for promotion, information and communication. Some proposed recognition of international standards. Many people highlighted the need for a credible system, which will have a real export value.

All the **member states** were in favour of assisting EU exports. The majority of them asked for promotion, communication, image building and identification of key characteristics for each target market. Some proposed mutual recognition of international certification schemes, while some others asked for transparent and homogenous rules set by EU.

The **third countries** replied that there should not be any discrimination against non EU products and that the private and the international certification schemes facilitate market access.

Local authorities were also in favour and they proposed WTO standard/ mutual recognition/ promotion/ facilitating contacts.

The majority of the **farming registered organisations** were also in favour, if certification schemes meet the needs of the market. They also proposed communication and promotion. Few said that this initiative must be left to the private sector.

Almost everybody from the **farming non registered organisations** was in favour. Few replied that certification schemes cannot achieve

this or are that they are against private certification schemes. More than one third of the contributors mentioned promotion, communication, support, label, information, even though some stressed that this should be a private initiative and that certification schemes depend on consumers' confidence. Some say that the importing countries should determine the criteria, some others proposes common EU/ international standards/guidelines and procedures. Finally, one said that the products should be promoted not the certification schemes.

Individuals from farming sector were also in favour, if the certification schemes meet consumers' demands. One suggests support according to art. 32 of Reg. 1698/05.

Trade registered organisations believe that this task is not for the EU and they do not recommend any public support to private certification schemes, but communication and awareness rising.

Most of the **processing registered organisations** were also reluctant. Some said that no public support is needed, while some others said that certification schemes give value to products and that Reg. 3/2008 could be used.

Retailed non registered organisations said yes through cooperation and bilateral agreements

Consumer's non registered organisations said that this may be an uncertain strategy both within and outside EU.

Consumers were more reluctant. Many of them stressed the need for transparent standards, coherent and homogenous criteria in EU, globally accepted certification schemes and procedures. Few stressed the need for controls and consumers' confidence, while few were against public support to private certification schemes.

Registered academic organisations said yes, if the standards are credible and they highlighted the products' specificity.

Non registered academic organisations expressed no clear view. Some mentioned international /uniform standards, while some others stressed the need for confidence and controls. Some of them were against these schemes, while few suggested that this is not a work for the public sector.

50% of the **environmental NGOs** are against the private certification schemes, while 50% proposed that certification should be done according to international standards.

The **development NGOs** proposed to increase awareness on fair trade and that Commission should prepare guidelines.

The **other organisations** had a diverse approach. Some said that private certification schemes are not credible, while some others stressed the need for controls, international certification schemes and mutual recognition at EU level.

How can the EU facilitate market access for producers in developing countries who need to comply with private certification schemes in order to supply particular retailers?

Many of the contributors proposed technical and financial aid. A lot of them proposed equivalent standards even if this idea was opposed by a majority of farmers' organisations and some national and regional authorities who did not want to facilitate the access to the EU market. Few organisations proposed to lower the standards for developing countries. Finally, several organisations mentioned origin issues, ethics, animal welfare, organic products and fair trade.

Most of the **member states** supported the idea of financial and technical aid. Some proposed a set of minimum standards. Few replied that EU and non EU countries should use the same production standards.

The **third countries** were in favour proposing technical aid/dialogue and mutual recognition of certification schemes, so that double certification is avoided.

The big majority of the **regional and local authorities** proposed cooperation/ guarantee of the identity of the product in order to meet EU consumers' demands. One proposed the development the logo "ethic" at WTO level.

A lot of **farming registered organisations** said that no additional access should be granted.

Some others proposed common private certification schemes, mutual recognition/ harmonisation/benchmarking.

Some of **farming non registered organisations** were against this approach, while some others said that these products/procedures should comply with EU requirements. Finally, some proposed harmonisation of legislation/ equivalent rules, EU/private logos and information/funding.

All the **individuals from the farming sector** said that the 'rules of the game' should be the same for everybody.

Processing registered organisations proposed equivalency, mutual recognition and an EU legal framework to increase transparency and efficiency of the schemes.

Many of the **processing non registered organisations** said that this is not a Commission's task. Some asked for mutual recognised international standards, some others proposed communication and few said that industry could manage this issue by itself.

50% of the **retail non registered organisations** replied that this has been already achieved by dialogue (GlobalGAP), while the rest 50% asked for information/equivalent certification schemes.

Consumers non registered organisations said that developing countries should be assisted to comply with certification schemes and that cooperatives should be encouraged

A lot of **consumer's non registered organisations** oblige non EU suppliers to abide by certification schemes.

Most of **consumers** said that certification schemes are very expensive for producers from developing countries and that there is a need for education. Some said that this out of the scope of the EU. Few proposed that they have to respect some minimum standards. Some others proposed harmonisation of private standards, reduction of burdens and administrative cost and subsidies to small holders in order to acquire products from developing countries.

The **registered academic organisations** stressed the need for know –how and inspection / certification.

Most of the **registered academic organisations** proposed assistance and awareness. Some stressed the need for confidence and accreditation. Some said that an EU - wide certification schemes could be extended to third countries but it is difficult to ensure control and supervision.

Environmental NGOs proposed easiest access to the EU market with lower standards.

Development NGOs would like to increase public awareness and information, support research, facilitate market access for organic farming and provide funding to producers cooperatives and NGOs that promote fair trade in EU.

Other organisations: Welfare and organic organisations want to promote these schemes to third countries, by offering trading opportunities, training, know-how and funding.

1.19. Question 19

Respondents are invited to raise any other issues concerning agricultural product quality policy that have not been covered.

This last question generated respondents' conclusions on the GP as well as very many divergent comments. The largest amount of replies concerned the support of promotion campaigns and better communication of the agricultural quality policy to the citizens.

A large number of replies concerned the simplification issue, the limitation of the role of the State and the need for harmonisation of the control practices at EU level.

Voices advocated the review the colour scheme of the new PDO logo and to use symbols in different colours for products from third countries. A few respondents mentioned the creation of a European Agency for Quality while there were also voices clearly against the creation of such an agency.

Some others concerned the obligatory labelling of GMO products or their offspring. One respondent suggesting that meat from animals fed with GMO should be labelled.

Few respondents wanted climate change issues and environment to be addressed more efficiently, an obligation to mention carbon balance and take into consideration the employment factor in the quality policy.

Some respondents underlined the importance to ensure the respect of high standard for all products processed and/or commercialized within the EU.

Voices advocated a **merging** of the PDO PGI signs into one term, **review** the colour scheme of the **new logo** and use symbols in different colours for products from third countries, introduce reasonable time (ex. 12 months) limit for accepting objections against registration, evaluate the policy every 10 years, common interpretation of the norm 45011 in all MS, create a common audit system to decrease audit pressure. Additionally one respondent considered that the **whole country** should be

defined as a region in the register, other respondents wanted **proportionate size of logo** to be able to put it on small foodstuff (like cheeses), voices advocated to make the **cahier des charges public** (by for ex. Putting them on a webpage), a contribution wants wild fish to be in the scope of Reg. 834/2007. One contribution underlined that the new Regulation of Food Information will be a disadvantage, because of national labelling rules that will restrict free movement of goods between MS.

Some replies concerned the issue of the **definition of quality**, and the imposition of additional terms: 'recipe', 'vegetal variety' or 'race'.

Some others concerned the obligatory **labelling of GMO** products or their rejection, with one respondent suggesting that meat from animals fed with GMO should be labelled.

A few respondents mentioned the **creation of a European Agency** for Quality, or that this task could be taken by the OHIM, while there were **also voices clearly against** the creation of such an agency.

Besides those main trends, there are a **number of other ideas** appearing throughout the contributions in different sectors.

- One respondent mentions that Art 13 of Reg. 510/2006 does not provide for sanctions neither identifies the actors in charge of control and sanctions. Need for clear identification of the holder of the IPR of GIs. As consortia in Italy are recognised as organisations representative of the totality or producers, the holdership of the IPR should be recognise to them. In case the consortium does not cover the totality of producers, the Ministry would be the title holder under national law (art. 14 L 526/99). That same respondent considers temporary stopping of registration of vegetal varieties at EC level, assessing whether there are applications for homonymous GI, proposals on production programming: flexibility on instruments aimed at withdrawing supply and marketing, programming in line with market conditions, prohibition of auction to the bottom to buy PDO/PGI, prohibition buy below the cost. On the consortium issue a respondent stated that producers in consortiums have high compliance costs, face antitrust norms which limit the instruments of adaptation of offer to the evolution of demand.

- a few contributions suggested the introduction of a territorial mark, regulating of the 'short

chain' or 'km zero', underline seasonality of products

- a respondent wanted climate change issues to be addressed more efficiently, obligation to mention carbon balance, take into consideration the employment factor in areas in the quality policy, one supports producers organisations, another the use of quality for horticulture agriculture, one suggestion to create a label 'biodiversity for all', a suggestion to have a logo for meat products respecting the environment
- GI system should not interfere with GLOBALGAP or similar
- important quality products should be controlled by the FVO
- a few contributions on food safety: is not a quality trait but a condition to put products on market whether imported or produced domestically, making food safety to a marketing tool would render irrelevant microbiological criteria, MRL for contaminants or residues for plant protection products set by the legislator.
- one respondent mentioned that some of the requirements of Dir. 2000/13/EC on labelling foodstuffs prevent European farmers from informing consumers properly of the qualities of foodstuffs they produce (art. 2(1)(iii)). Recommendation to allow specific characteristic of the product to be listed on the label if this serves to inform the consumer better, even if a similar foodstuff has the same characteristic, ex: natural mineral water comes from a protected water bed.
- an idea that it would be interesting to give information on the price paid to the producer (discrepancy in price paid to producer and price paid by final consumer – strong retail chain)
- last but not least, some respondents underlined that the principal interest is to assure high standard for all products that are processed and/or commercialized inside the EU

2. LIST OF CONTRIBUTORS

Contributions from registered organisations

| | | | |
|---|----|---|----|
| Danish Dairy Board | BE | European Livestock and Meat Trading Union (UECBV) | |
| Pernod Ricard | BE | | BE |
| EUCOLAIT | BE | Dairy UK | UK |
| Cooperativas Agraria | ES | AIDA Associazione Italiana di diritto alimentare | IT |
| Save Foundation | DE | AREFLH | FR |
| NFU | UK | European Citizens' Seminars e.V. | DE |
| Assolatte | IT | ECPA aisbl | BE |
| CELCAA | BE | American Chamber of Commerce to the European Union (AmCham EU) | US |
| Anonymous | | | |
| FICT - ADEPALE | FR | Coop de France | FR |
| Avigers | FR | A.R.E.P.O. | FR |
| Dintec | IT | Groupe Carrefour | BE |
| Forschungsgruppe Lebensmittelsicherheit | AT | Euro Coop | BE |
| PROVIEH | BE | Danish Food and Drink Federation | DK |
| Associação dos Criadores de Bovinos de Raça Mirandesa | PT | Assemblée Permanente des Chambres d'agriculture | FR |
| BioForum Vlaanderen vzw | BE | Qualité et origine | FR |
| Demeter | SI | Provision Trade Federation | UK |
| Association des producteurs fromagers fermiers de Corse | FR | Federalimentare | IT |
| Aphrodite Delights Ltd | CY | Limousin Promotion | FR |
| Freshfel Europe | BE | ERPA | FR |
| ASS. TAL-BDIEWA (ATB) | MT | Eurogroup for Animals | BE |
| Malta Organic Agriculture Movement | MT | Euromontana | BE |
| CNAOC | FR | FederBio | IT |
| QUALIFICA | PT | Synalaf | FR |
| CEVI | FR | FLR (Fédération Label Rouge et IGP) | FR |
| CEEV-Comité Européen des Entreprises Vins | BE | Sylaporc | FR |
| BIO AUSTRIA | AT | FIL Rouge | FR |
| CNAOL | FR | Asociación de Industrias de la Carne de España (AICE) | ES |
| Institut de Recherche en Agriculture Biologique pour l'Europe (IRABE) | FR | INTERBEV | FR |
| | | Organization for an International Geographical Indications Network (oriGIn) | CH |

Contributions from public authorities

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| Waltraud Wolff (SPD- Bundestagsfraktion) | DE | | |
| Office fédérale de l'agriculture OFAG | CH | Ministerium für Ernährung und Ländlichen Raum | DE |
| Zwiazek Województw | PL | The Scottish Government for Rural Affairs and Environment | UK |
| Agriculture and Horticulture Development Board | UK | | |
| Provincia di Forli-Cesena, Ass. Pol. Agro-Ali. | IT | Ministry of Agriculture, Agriculture and Forestry Division | SE |
| ZWRP Union of the Voivodeships of the Republic of Poland | PL | Provincia di Parma | IT |
| Marszalek Wojewodztwa Warminsko-Mazurskiego | PL | Ministeriet for Fødevarer, Landbrug og Fiskeri | DK |
| | | Bundesministerium für Gesundheit Familie und Jugend | AT |
| Embassy of Australia, Australian Mission to the European Union | BE | Conseil national de la Consommation CNC | FR |
| Ministerie van Landbouw, Natuur en Voedselkwaliteit van Nederland | NL | Wojewodstwo Pomorskie | PL |
| German Government | DE | Province Limburg | NL |
| Natural England | UK | Prefecture of Preveza | EL |
| Regione Piemonte | IT | Junta de Andalucia | ES |
| | | Direccao Regional de Agricultura e Pescas do Norte | PT |
| | | Regione Marche | IT |

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| US Mission to the EU | US | Vlaamse Overheid Departement Landbouw en Visserij | BE |
| Department of Agriculture | CY | | |
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| Ministry of Agriculture | SK | Republic of Estonia Ministry of Agriculture | EE |
| Ministry of Agriculture and Rural Development | HU | Ministry for Rural Affairs and the Environment | MT |
| Région Midi-Pyrénées | FR | Ministry of Agriculture | LT |
| Regione Emilia-Romagna | IT | MMM.FI | FI |
| Industrial Property Office of the Czech Republic | CZ | Ministry of Agriculture of the Czech Republic | CZ |
| Departamento de Agricultura Pesca y Alimentación del | | Ministry of Agriculture, Forestry and Food | SI |
| Gobierno Vasco | ES | DEFRA | UK |
| Conseil régional de Basse-Normandie | FR | Inspekcja Jakości Handlowej Artykułów Rolno- | |
| Comunità Montana dell'Appennino Reggiano | IT | Spozywczych | PL |
| Conseil General de l'Aude | FR | Ministry of Agriculture and Food | BG |
| Διεύθυνση Γεωργικής Ανάπτυξης Πρέβεζας | GR | Ministry for Resources and Rural Affairs | MT |
| Ministerio de Medioambiente y Medio Rural y Marino | | Folketinget | DK |
| | ES | Finnish Food Safety Authority Evira | FI |
| République Française | FR | Secretaría de Agricultura, Ganadería, Pesca y Alimentos | |
| SPW Département du Développement Direction de la | | de la Republica Argentina (SAGPYA) | AR |
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| Agroalimentación y Calidad | ES | Bovis | FR |
| Αγλλέας Σωτηρέλης | CY | Anonymous | |
| Anonymous | | Anonymous | |
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| Anonymous | | | |

Unregistered organisations

| | | | |
|--|----|--|----|
| Assured Food Standards | UK | Alsace Qualité | FR |
| CNA - Confederação Nacional da Agricultura | PT | Feagas | ES |
| The Wine and Spirit Trade Association | UK | Meat Southwest | UK |
| Martin Propollo | ES | Corvinus University | HU |
| Szatmari | HU | Association Afidop | IT |
| AICIG | IT | APCA | FR |
| CNA | IT | GQNPC | FR |
| CISE | IT | Irqua | FR |
| FNLI | BE | AFNOR | FR |
| GMO-free European Regions Network | ES | Αφοι Αργυράκη AEBE | EL |
| Rural Development Department, Agricultural and Research and Development Centre | MT | CECRV | ES |
| Union of Agricultural Economists | BG | Fédération Nationale d'Agriculture biologique | FR |
| Association of Poultry Producers | BG | Association Bleu-Blanc-Coeur | FR |
| GQNPC | FR | LTO Groieservice | NL |
| IRQUA | FR | Verening van Sausfabrikanten | NL |
| CNIV | FR | Nederlandse Margarinefabrikanten | NL |
| Eucofel | BE | Verein Münchener Brauereien e.V. | DE |
| Assomela | IT | Productschap Tuinbouw | NL |
| SMM Schutzgemeinschaft für Milch und Milchzeugnisse | DE | KSL Matmerk | NO |
| Solveks Mira Frukt Ltd. | BG | Milchindustrie-Verband e.V. | DE |
| Association de défense de l'oignon doux de Cévennes | FR | FLAI Nazionale | IT |
| Anonymous | | COPAGRI UIMEC UIL | IT |
| Istituto di Diritto Agrario Internazionale e Comprato | IT | CERVIM – QUART | IT |
| CONFCOOPERATIVE Forli-Cesena | IT | Groupement Européen des Producteurs de Champignons | FR |
| COLDIRETTI Emilia Romagna | IT | Anheuser-Busch Inbev | BE |
| Unternehmen Milch | DE | CLCV | FR |
| Frankischer Weinbauverband e.V. | DE | UNAF | FR |
| Food Institute of Kaunas University of Technology | LT | Assocaseari | IT |
| White House Consultancy | UK | AIJN (European Fruit Juice Association) | BE |
| Conaf | IT | AICV | BE |
| SIT - Istituto Salumi Italiani Tutelati | IT | Deutscher Weinbauverband | DE |
| Irish Cattle and Sheep Farmers' Association ICOSA | IE | European Agriculture and Health Consortium | BE |
| VLAM - Vlaams Centrum voor Agro- en Visserijmarketing vzw | BE | FIAB - Spanish Fed. of Food and Drink Ind. | ES |
| Soil Association Certification Ltd | UK | MARQUES | |
| Lohmann & Co. AG Zentrales Qualitätsmanagement | DE | INTA | BE |
| Päivittäistavara kauppa ry (Finnish Grocery Trade Association) | FI | National Beekeeping Associations | UK |
| Fédération Nationale Ovine FNO | FR | Vereniging van ned. Glucosefabrikanten | NL |
| FDSEA 88 | FR | Nederlandse Vereniging van Producenten van Ontbijtgranen | NL |
| FDSEA 64 | FR | Nederlandse Vereniging van Soepenfabrikanten | NL |
| Association des Produits Porcs du Sud Ouest APPSO | FR | LandbrugsRaadet | DK |
| Skarpalezos-Marinis Co | EL | Interpore Auvergne Limousin (IPAL) | FR |
| Producentow Zywnosci Ekologiczne Ekopolsk | PL | Association des Interprofessions Porcines de Montagne | FR |
| Le Cochon de Bretagne | FR | VNU-FA | DE |
| Produktu Regionalnego i Lokalnego | PL | UPEMI | PL |
| Catalonia Qualitat | ES | Baromfi Termék Tanács Poultry Product Board BTT | HU |
| Federação Agrícola dos Açores | PT | Lietuvos Vartotoju Asociacija Lithuanian Consumers' | LT |
| Acrefa | ES | Association | LT |
| Polski Klub Ekologiczny | PL | Estonian Consumer Production Board | EE |

| | | | |
|---|----|--|----|
| Federation of the Food and Drink Industries of the Czech Republic | CZ | Lithuanian Institute of Agrarian Economics | LT |
| Baking Industry Union | HU | Peel Holroyd and Associates | UK |
| Food Fighters 2008 - Danish Meat | DK | Niederegger Lübeck | DE |
| CIBC/IMV/IBC | BE | Cooperative Union of Slovenia | SI |
| ACYCSA | ES | Zentralverband Gartenbau e. V. ZVG | DE |
| Latvijas Valsts auglīkopības institūts | LV | Bayerischer Brauerbund e. V. | DE |
| Confederation of the Food and Drink Industries of the EU (CIAA) | BE | Centre National Interprofessionnel de l'Economie Laitière | FR |
| Biedrība Zemnieku saeima | LV | Finnish Dairy Association - Finnish Food and Drink Industries Federation | FI |
| BIOEKSPERT Certification Body for organic farming | PL | Fédération des entreprises du Commerce et de la Distribution FCD | FR |
| Országos Húsipari Kutatóintézet Kht. | HU | Chambre d'Agriculture et d'Alimentation de la République slovaque | SK |
| Vignerons Indépendants de France | FR | NEULAND e.V. | DE |
| Hungarian National Committee for EOQ | HU | Confédération Paysanne et FADEAR | FR |
| Magyar Ásványvíz Szövetség és Terméktanács | HU | Fédération ProNaturA | FR |
| Assoziation ökologischer Lebensmittel Hersteller (AoeL) [Association of organic food producers] | AT | EFNCP European Forum on Nature Conservation and Pastrolism | UK |
| Comité des Salines de France | FR | AVIALTER | ES |
| Fermiers de Loué | FR | F I V I Federazione Italiana Vignaioli Indipendenti | IT |
| CEPPARM | FR | APRAM Association des Praticiens du Droit des Marques et des Modèles | FR |
| Biologica | NL | Consortium du Jambon de Bayonne | FR |
| Melon du Quercy | FR | Verein Geografischer Herkunftsschutz (VGH) | AT |
| C R I G P Botillo del Bierzo | ES | Union der Deutschen Kartoffelwirtschaft | DE |
| Chambre Régionale d'Agriculture d'Auvergne | FR | Verband der Fleischwirtschaft | DE |
| Τάκης Παπαϊωάννου Ατδ | CY | Syndicat des Prod Pelardon | FR |
| Union porcine rhone-Alpes | FR | Stichting Voedingscentrum | NL |
| RIFOSAL | IT | British Retail Consortium | BE |
| APETAL | PT | Rimi Baltic Group | LV |
| Centrale Organisatie voor de Vleessector (COV) | NL | Latvijas Biškopības biedrība | LV |
| Amalthia Trading Ltd Andreas S Agrotis ASA LTD | CY | Agriculture and Horticulture Development Board Meat Services | UK |
| VLAM – Streekproducten | BE | ASOPROVAC | ES |
| Inštitut za trajnostni razvoj | SI | Consejo Regulador I G P Judías de El Barco de Ávila | ES |
| SIDAM | FR | Αγροπεριβαλλοντική Ομάδα Βιοκαλλιεργητών Δυτικής Ελλάδας | EL |
| Dairy Australia | AU | IFOAM EU Group | BE |
| Association of Poultry Processors and Poultry Trade in the EU countries | BE | Culinary Heritage (Europe) Småland | SE |
| Svenskmjolk | SE | Consejo Regulador I G P Lenteja de la Armuña | ES |
| Central Union of Agricultural Producers and Forest Owners | FI | Synabio | FR |
| UFCS | FR | Consorzio del Formaggio Parmigiano-Reggiano | IT |
| Eurocommerce | BE | Productboard Poultry and Eggs | NL |
| Country Land and Business Association Ltd | UK | Association Interprofessionnelle des Herbes de Provence | FR |
| Dutch Produce Association | NL | ATLA (Association de la Transformation Laitière Française) | FR |
| Ensa | BE | Consejo Regulador I G P Garbanzo de Fuentesauco | ES |
| COPA-COGECA | BE | Unión de Pequeños Agricultores y Ganaderos (UPA) | ES |
| KRAV | SE | Camera di Commercio I A A di Trento | IT |
| Mārketinga Padome | LV | ELO asbl - European Landowners' Organization | BE |
| Latvijas gaļas liellopu audzētāju asociācija; Latvijas Zemnieku Federācija | LV | ISARA-Lyon | FR |
| Latvijas Lauksaimniecības universitāte un Latvijas Bioloģiskās lauksaimniecības asociācija | LV | Fair Trade Advocacy Office | BE |
| FRUITVEB | HU | FNSEA | FR |
| Országos Fogyasztóvédelmi Egyesület | HU | AK Wien | AT |
| Lietuvos žemės ūkio bendrovių asociacija | LT | European Spirits Organisation | BE |
| Association française des producteurs de sel marin de l'atlantique récolté manuellement | FR | Association Francaise des Indications géographiques | FR |
| Latvian State Institute of Agrarian Economics | LV | Συμβούλιο Αμπελοοινικών Προϊόντων | CY |
| Euragro Agriculture and Rural Development | HU | | |
| FEPEX | ES | | |

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| European Dairy Association – EDA | BE |
| Food Drink Federation | UK |
| Confederazione Nazionale Coldiretti | IT |
| FNSEA-FNP | FR |
| Federation of Swedish Farmers | SE |
| QS Qualitat und Sicherheit Gmbh | DE |
| CONFAGRICOLTURA | IT |
| Taste Council of Ireland | IE |
| Origen España | ES |
| Compassion in World Farming | UK |
| O'Connor and Company | BE |
| Fairtrade Finland | FI |
| IOBC Commission "Integrated Production: Principle and endorsement" | CH |
| Confederazione Italiana Agricoltori | IT |
| Chambre Régionale d'Agriculture de Franche-Comté | FR |
| IRQUALIM | FR |
| Association Force Ouvriere Consommateurs | FR |
| BLL Bund für Lebensmittelrecht und Lebensmittelkunde | DE |
| ANIA | FR |
| INAPORC | FR |
| ANAS (Italian Pig Breeders Association) | IT |
| Federation of Hungarian Food Industries | HU |
| Chambre régionale d'agriculture d'Aquitaine | FR |
| Association Interprofessionnelle du Haricot arbaïs | FR |
| CLITRAVI | BE |
| CEJA | BE |
| ARIBEV-ARIV | FR |
| IRQUA-Normandie | FR |
| FACW Filière Avicole et Cunicole Wallonne (asbl) | BE |
| Consorzio Prosciutto Parma | IT |
| Hellenic Quality Foods SA | EL |
| Asociación española de Empresas de la Carne – ASOCARNE | ES |
| LTO | NL |
| Groupe Lactalis | FR |
| Malta Organic Agriculture Movement | MT |
| Chambre régionale d'Agriculture Rhône-Alpes | FR |
| Les éleveurs de Challans | FR |
| Kreisimkerverband Duisburg | DE |
| Genista Research Foundation | MT |
| Fundación del Jamón Serrano | ES |
| J. Turull-Gremi Pastisseria | ES |
| Chamber of Agriculture and Forestry of Slovenia | SI |
| BEurope Ltd. | MT |
| Quality Meat Scotland | UK |
| Organisme de Défense et de Gestion REGAL | FR |
| The Potato Processors' Association | UK |
| Deutscher Raiffeisenverband e.V. | DE |
| Deutscher Bauernverband | DE |
| BioKurier | PL |
| Bundesinnungsgruppe Lebensmittel und Natur | AT |
| Cermet | IT |
| Van der Staay Barendrecht b.v. | NL |
| Advantage West Midlands | UK |
| Collectif de Remises en Causes. R.E.C. | FR |
| INCOFRUIT - (Hellas) | EL |
| Technical University of Munich | DE |

