

FINAL MINUTES

Meeting of the Civil Dialogue Group HOS – Fruit and Vegetables

25/09/2020

Chair: Mr Garcia Fernandez (SACAR)

Organisations present: All Organisations were present, except BEUC, Birdlife, EFNCP, EPHA

Approval of the agenda: Agenda is adjusted according to the schedule for interpretation. Agenda is adopted with slight changes in the order of points 3 and 4

Nature of the meeting: The meeting was non-public. It is part of the Civil Dialogue Group HOS, section Fruit and Vegetables. Meeting was for the appointed CDG organizations and was not webstream.

Election of the president: The procedure of vote is adapted to the online system. The candidates are as follows:

- i. Mr Sanchez de Puerta Diaz as president on behalf of COPA COGECA, for a second mandate
- ii. Mr Jose Antonio Garcia Fernandez , as vice president on behalf of SACAR – representing Freshfel Europe for a second mandate
- iii. Ms Sarah Melina Siebel as vice president for FoodDrinkeurope representing Spirits Europe for a second mandate

The election provided the following outcome:

- The chair Mr Sanchez de Puerta Diaz is elected
- The vice chair Jose Antonio Garcia Fernandez is elected
- The second vice chair Ms Sarah Melina Siebel is elected

Policy points discussed during the CDG Horticulture , section fruit and vegetables

- 1) **Plant health and OCR : Switch of plant health interceptions reporting from Europhyt to Traces.** A presentation is made by DG SANTE on the functioning of TRACES. TRACES legal basis is the new OCR (Reg. 2017/625), where TRACES is integrated as one of the components of IMSOC (under Implementing Regulation 2019/1715). TRACES is the EU Commission platform allowing transmission of SPS certification when it is required by EU legislation. This includes imports of animals, animal products and food and feed of non-animal origin as well as plants. Intra-EU trade in live animals and certain animal products are also included, as well as for EU export certifications when this has been accepted by the third country. TRACES is

not fully operational yet when it comes to exports of plants, but this will change in the future. TRACES allows to manage different areas under DG SANTE competence, including animal and veterinary public health, public health (e.g. pesticide residues, aflatoxins) and plant health. TRACES is a free of charge, web based, centralised system, which allows private-public collaboration to exchange documents. Interface is also user friendly, multilingual, and including guidance to fill in documents. It is now also connected to the IPPC e-phyto hub. It also provides access to all legal documents. 91 countries and overseas territories are using TRACES, including 59 non-EU countries, the 4 EFTA countries, and the 27 MS plus the UK. So far, TRACES has been used mostly for intra EU documents, phytos only represent 1 percent so far of the documents exchanged. One third of users are from the private sector and two thirds are public authorities. TRACES incorporates various modules such as the Common Health Entry Documents (CHED), the EU IMPORT module (for animals, animal products and food and feed of non-animal origin), the PHYTO and IPPC e-PHYTO module (phyto certificate), Plant Health Interception notifications modules, and the former TRACES platform (which can still be accessed, like EXPORT, INTRA etc. all related to the animal sector) and certificate for organic inspections (COI). More specifically , Commission informed about:

- CHED: mandatory use by Member States with no exceptions since 14 December 2019 in order to provide pre notification at the point of entry of the Union (part I of the doc. Filled by operators responsible for the consignment in the EU) + part II (filled in by authorities to record the outcome of official controls) + Part III (filled in by authorities to record follow up after decision has been taken). There are different CHEDs, notably CHED-PP for consignments of plants and plant products and CHED-D for consignments of food and feed of non-animal origin. A plant can be included in both regulations (PP and D).
- E-Signature enrolment in Member States authorities in September 2020: the EU Commission is pushing MS to enrol for CHEDs and for the COI. When ready, paper is no longer necessary.
- Phytosanitary certificate: used as voluntary basis by non-EU countries for export to the EU. Not very much used in the past, although it can issue electronic certificates, 4700 so far. 5 French overseas territories are using it since 14 December 2019. Tunisia was onboarded in April 2020, although the electronic transmission for PCs is ongoing.
- IPPC ePyto hub: since 12 May TRACES is enabled to receive certificates from all countries connected to the e-phyto hub. This allows countries not connected to TRACES to have access to the EU and other markets and transmit phytos. 9 countries are already “in”, and others are in the process of being connected. Argentina, USA, Morocco, Costa Rica, Mexico Fiji, Samoa and Jamaica already sent PCs via this way to the EU, although paper is still needed as electronic signature of data exchange is not implemented. New Zealand and Morocco are the most advanced in the implementation of the signature so soon no paper will be needed.
- Export: Member States have also sent a lot of requests to be able to use TRACES for export. The EC hopes to finish this process by next year.

- Rules are important for the transmission of electronic PCs. This should be done in accordance with Article 39 of the IMSOC regulation. It can only be issued by a third country in TRACES or in an International Organisation certification system capable of exchanging data with TRACES, and in line with the eIDAS Regulation setting up the definition of advanced electronic signature and the security level that must be included, as well as how to verify identity etc.
- COVID19: we are currently in a specific situation as the COVID Regulation has set exceptional measures (a third modification voted yesterday in the animal health committee to extend this measure until 1 February from end of September). The Regulation foresees that OC can be exceptionally performed either on a copy of the original certificate on the condition that the original is made available later on at entry point OR based on electronic data from certificates available in TRACES. When it comes to plants, the original certificate is not required for countries enrolled in TRACES for the time being (French Ultramar 5 territories, Tunisia and 9 countries under ePhyto). As a permanent measure, the 5 French ultramar territories are permanently accepted.
- Integration of Europhyt in TRACES : Europhyt was created in 1995 to notify interceptions of plants and harmful organisms. IMSOC Reg provides that TRACES should be used for these interceptions, to notify non-EU countries and EPPO. Since 12 June 2020, all plant interceptions are recorded in TRACES and they continue being monthly published at DG SANTE website. These interceptions are also registered in MS entry documents – there is still a duplication of work there which has to be addressed. EU has stopped the email interception notification system to third countries as a result of this transition. Now, it is replaced by access to the TRACES request. The EU has informed third countries NPPOs of this new notification procedure by letters sent to former contact points for plant interceptions.

2) Agriculture policy issues

- a) **CAP post 2020 and Transition measures:** The European Commission presented the latest policy developments in respect to the CAP reform transitional provisions for operational programmes in the F&V sector. First and with a view of the delay in the reform, a transition period of one year was proposed by the Commission (COM(2019) 581) prolonging the current CAP for one year. However co-legislators have agreed on a two years transition period (2021 and 2022) for the whole CAP. As regards ongoing operational programmes (OP) in the F&V sector at the end of the transition, according to the EC proposal, all PO have three options:
- 1) modify before 15 Sep 2021 its operational plan to adapt to the requirements of the strategic plan
 - 2) to replace the OP and adopt a new one to be approved by national authorities which would be in line with the new regulation
 - 3) if by 15 Sep 2012 none of those options are presented, the OP would end on the last day of the transitional period.

By proposing this the COM assumed that the substitution of the ongoing OP for new ones in line with the strategic plan should have been easy as the differences in substance of the measures covered are minor. The single relevant change concerns the minimum expenditure related to environmental measures (from 10% up to 15-20 percent discussed for the new strategic plans).

As revised by the EP and Council political agreement on the Transitional Regulation, now we talk about

- a transitional period which would run until the end of December 2022.
- the PO could decide to continue to operate its ongoing operational programme until its end under the current conditions.
- during the transitional period, PO who submit an extension to their programme within the 5 year limit, this may only run until end of Dec 2022. However new operational programmes, approved during the two years transition, may have a duration of 3 years maximum.

European Commission services have informed co-legislators about the implications of this approach: First, this means there would be 2 different legal frameworks and eligibility conditions applying simultaneously for up to 3 years for the F&V operational programmes after the application of the new CAP. This should be reflected by MS in future strategic plans. So POs with an ongoing OP at the end of the transitional period could choose to run it until its end while other POs would move into the new legislative framework. So during the first three years of the new CAP POs can have different legal and eligibility requirements and different environmental minimum expenditure (under the new or old requirements). This also means for EC and MS that will have to apply simultaneously different control and audit systems. The EC thinks this is a missed opportunity, misses the chance to enter into the new framework smoothly with equal treatment for all POs. The legislative procedure is not finalised yet, during October, inter institutional negotiations (trialogues) will start in respect to the CAP Strategic Plans Regulation, including these transitional provisions for our sector. We expect that next year a final political compromise will be reached for the reform package.

Comments and questions from CDG members:

- The increase to 20% of environmental measures can indeed compromise the ongoing OP, so this is a small but important change for POs, as the EP is also noting. Question, if a PO proposes a new OP in Sept 2022, can they also propose a 5 year programme? EC reply: Any new programme approved between the enter into force of the Transitional Regulation and the end of the transitional period will have a maximum duration of 3 years, not 5.
- On the comment about the environmental ambitions, the EC does think it was a missed opportunity as the PO in fruit and veg. sector are front runners, one of the sectors that get most benefits from F2F, so pity to delay this increase in environment ambitions apart from distortions that may appear among POs due to the transition approach, under discussion by the co-legislators.

b) **Ready to eat and kitchen ready** :Upon request of the sector, the European Commission services presented an update on the scope of application in regard to marketing standards and origin labelling for a wide variety of fresh produce moving

towards more convenience, in particular ready to eat and kitchen ready products. It is reminded that there is a clear legal framework in the regulation on marketing standards regarding mandatory indication of origin of the produce. However, there are exceptions to this rule set by the legislation, notably on ready to eat and kitchen ready products. There is however no definition as to what this type of product covers or are therefore exempted from origin labelling, but fruits and veg. being cut up are mentioned, while cleaning is not included in this exemption article. There are also other derogations such as marketing rules for fresh and dried products and mixed products. With the evolution of convenience products, there is potential conflict of interest between the sector that wants less complexity and consumers expecting more information. Within F2F policy this is also one of the goal to provide more information about the products and expectation of consumers. The European Commission presented this point also to Member States in a recent management committee but there are various views so this remains an open issues. During the CDG several examples were viewed to the audience to try explain concretely the rule that will apply.

Comment from CDG members:

- Statement from COPA COGECA: origin labelling should always be present as consumer expects to receive same information when they buy a bag of lettuce or an entire plant and not individual leaves only. So they need to be marketed fully under the mandatory labelling rules, origin should always be clearly labelled.
 - Beyond case study presented in the PWP, The Netherlands delegate indicates that he will provide more information to the Commission on this point (more example of the evolution of convenience).
- c) **COVID-19:** The Commission presented an overview of the 7 regulations adopted by the Commission since April, including three Delegate Acts (DA) and four Implementing Acts (IA) which apply for 2020 to assist the sector with more flexibility to cope with the consequences of COVID-19 pandemic. These new flexibility legislation cover a wide range of issue including among other:
1. Removing the limit for PO's in spending that can be allocated to crisis prevention in 2020.
 2. Measures for OP, aiming at loosening criteria to prevent that in 2020 PO loss their status, especially on the minimum number of members and the management of the PO. Less rigidity also on amount of sold products. Losses are also compensated by a 100 percent so the figures of production do not fall. PO can also partially or completely suspend their OP if they are not in a situation to continue spending money in this manner. If an OP faces difficulties, PO are not penalised according to this regulation.
 3. Increased financial flexibility with in certain cases participation of the EU up to 70 percent, but limited to the amount initially approved in the OP for 2020. Also, the PO may modify operational programme in its form for 2020.
 4. More flexibility on controls done by MS, so it stipulates minimum percentages, for example 3% or 10% can be removed without authorisation. Controls are not abolished but their level are lowered to minimum amounts for MS flexibility.
 5. Additional derogation measures for the execution of operational programmes

6. Specific rules for potatoes which allows flexibility to manage the potato sector for processing especially agreement with operators of any kind as the sector is most affected by the closing of food services channels

7. Specific rules for flowers allowing PO and associations to take measures amongst themselves like free distribution, joint production etc.

- d) **Proposal of regulation 891/2020 to be simplified currently under discussion:** The Commission presented the broad elements of its proposal for a Regulation debated in Committee with Member States end September, modifying the delegated act amending Regulation 2017/891 for subcontracting to a first grade and allow cascade subcontracting. This foresees to open a ‘delegation chain’ as far as PO keeps control of this chain. Also, it will provide the possibility for processed mushroom for not only take into consideration “Paris mushroom” but also other types which are grown like the Asian ones which are better remunerated. Third, align the fruit and veg policy to be able to use the standard costs in a wider manner. In line with Court of Auditors report, there is also an identification of a risk of over compensation in the withdrawal schemes for processing. The EC aims at limiting this compensation to the market price (average price calculated for 3 previous years by PO). On the calculation of 5% in withdrawal (Article 45) – EC foresees a new formulation which does not change the quantity/approach of this provision, but clarifies the formulation of the Article to make it more understandable for MS. On insurance, when there is a national support, we suppress the criterion which now limits the application to ‘depressed regions’ for easier use. The EC plan is to see this regulation applied by January of February next year.

3) Agriculture practices

- a) **Importance of non-crop vegetation on fruit:** Presentation by the University of Copenhagen on the benefit of non-crop vegetation. There is a risk of lower yield due to decline of natural enemies and natural biological control and decline in pollinators. Non-crop vegetation can improve yields according to the study of University of Copenhagen. Tests demonstrate that the strategy could lead to more natural enemies, fewer pests and lower percent of damaged fruit. The presentation highlighted some of the latest stage of research in this respect. It is noted that intensified agriculture is putting pressure on insect presence. This is illustrated by the dropping of honey hive weight. The consequence is a decline in natural enemies and natural biological control, as well as pollinator services. This leads to risks of lower yields and the need to support the pollinators. Non Crop vegetation can be used to retain yields, supporting the predatory natural enemies and pollinators, and avoiding the side effects of additional insecticides use. To support natural enemies and pollinators, flowers all season long, one needs undisturbed soil, connectivity of populations and minimized use of insecticides. Distances between resources, nest and shelter for these natural enemies and pollinators are usually small but change depending on species (e.g. longer distance for bumble bees, or spiders and solitary bees). About recent studies the following were underlined:
- Study on apples, shows non crop vegetation can improve yields for organic orchards, supporting pollinators and natural enemies. Few studies on effect of natural enemies on increasing yields.

- Results from EcoOchards project 2015-18: achieved positive effects with inter row flower strips, increased natural enemies, fewer pests and lower percentage of damage fruit.
 - 5 years study in Canada: over years, they could get reduced damage from pests in existing orchards where they had flower strips (e.g. maggot, lepodoptera).
 - Another study showed similar positive results for yields in blueberries in USA. Growers are motivated to use these measures of preventions like perenneal flower strips, or insects hotels, because they expect multiple services: crop protection, but also environmental benefits. Also limits and challenges -researchers are also studying this motivation.
 - In Global Review 2020, it is concluded that there is better pest control with flower strips across crops, but too few studies include yield effects among other challenges. There is a need for the integration with other strategies like pheromone disruptions.
- b) **Farm to fork strategy:** The Commission presented the main steps undertaken for the launch of a new farm to fork strategy. It aims at getting an integrated food policy approach, for the first time all actors across the food chain and not individually (production, consumption etc). Growing interest of consumers in the area of food and health was a key political driver. The Strategy looks at all three pillars of sustainability: economic, social and environmental. Many different challenges involved, including a new one, the COVID pandemic with resilience and food security. The targets of the strategy currently under discussion would aim at explaining how the implementation will be done and how to support this transition. By end of this year, the Commission will come up with recommendations to MS. Looking at concrete initiatives the Commission highlighted the following steps:
- Legislative framework for sustainable food systems: work starting now to be ready by 2023
 - Contingency plan (2021): need to be ready for future disruptions in the food supply, scheduled for next year.
 - Actions to ensure food production. organic ambitions, work underway to come up with an action plan which will be one of first deliverables). Also work on integrated nutrient management for fertilisers, revision of sustainable use legislation and reduction of use of plant protection products and fertilizers...
 - Action to stimulate sustainable practices by food industry and retail: some initiatives in preparation like the Code of Conduct and the marketing standards revision.
 - Actions to promote shift towards healthy, sustainable diets: creating right environment and providing right information so consumers can make informed choice. Initiatives relating to labelling, including front of pack nutrition labelling, origin indication etc. Also looking at the school scheme, the promotion programme and public procurement.
 - Actions to promote global transition: need to support developing countries in their transition, inclusion of ambitious sustainability chapter in FTAs, including on food, work through international standards setting bodies...

This matter is still at the beginning of the process. An important next step will be the conference on 15 & 16 October 2020.

- c) **Funding opportunities through financial instruments, venture capital and the EIB:** Presentation by the Commission on financial instruments and the support provided to agriculture, including F&V, with EIB lending and the joint DG AGRI – EIB initiative on Young farmers undertaken in 2019. With more pressure on budget dedicated to agriculture, and an increasing market gap in their banks' support, there is a need to find new ways of financing the farm businesses in the EU. DG AGRI study findings have shown that farmers have more difficulties to access to finance than SMEs in other sectors. Under the EAFRD, Member States are setting up FIs in the form of loan and guarantee funds, with equity funds not being considered. These FIs may provide growers with better credit conditions and lower interest rate, longer repayment terms, grace periods, etc. In the current programming period, financial instruments are set up by 11 Member States with programmed resources of 800 million € total public support.

There is increased need for financing farmers, and growing expectations on both sides, farmers and banks. DG AGRI fi-compass survey among 7,600 farmers at EU-level showed that costs of production and sales prices are the main concerns for farmers, i.e. their profits, which determine their possibility to expand businesses, invest and being able to repay any loans. Around 60% of the bank refusals is driven by the banks' perception of the high risk in agriculture. In many Member States, despite the significant number of financial operators, there are only a few players working in agriculture, which sometimes control more than two-thirds of the financing to the sector, meaning higher interest rates and less flexibility for farmers to lend money and for diversifying their financial sources. By setting up financial instruments under the EAFRD there is an opportunity to offer better financing conditions and push down any more restrictive market behavior of traditional banks.

For the post-2020 period, same possibilities would exist for MS. MS will also be able to design instruments in best possible way in relation to the national situation. There are a single set of simplified rules with minimum eligibility restrictions. Also specific technical assistance programme to train staff of managing authorities, to do analyses and promote the use of FIs will continue to be applied.

The cooperation between COM (DG AGRI) and EIB on agriculture started in 2014 with the signature of a specific Memorandum of Understanding. New initiatives of DG AGRI with EIB include the EAFRD-EFSI combination, the young farmer's initiative and a joint work on rural infrastructure and financial instruments. In regard to the EIB Initiative on young farmers, there were two streams independent from each other: (i) an EIB programme loan of EUR 1 billion of which 10% at least had to be spent on projects submitted by young farmers, and (ii) offer to the EAFRD managing authorities to create financial instrument for young farmers and combine it with grants into a single operation. The demand from EU banks on the programme loan was significant and within a period of only 6 months all resources were allocated. Main countries benefitting are Italy France Greece and Croatia. Expectations are that we will have around 120-250 million from the overall amount spent for young farmers.

Comments from the chair: what about venture capital? European Commission response: The access to venture capital, and in particular the setting up and management of venture capital (equity) funds, requires good market knowledge on

the side of the managing authorities and the fund manager. Such investments happen in highly innovative areas (such as R&I, agri food processing, new types of food products, etc.), where start-ups can generate sufficient profits in a rather short period in time. Enterprises need to have the right legal form allowing proper investments into their assets and clearly distinguishable management responsibilities. The presence of many family farms in EU agriculture does not favour the use of venture capital and it is equally difficult to invest into agricultural co-operatives. We do not have any examples of venture-capital funds under the EAFRD. DG AGRI is ready to support any managing authority willing to set-up an equity fund through its technical assistance platform fi-compass.

4) Market and trade issues:

- a) Market Observatory:** The Commission made a review of the last 3 market observatory meetings (pip fruit, stone fruit and tomatoes). A) for the subgroup pip fruit (15 May): stock taking of production of the 2019-20 campaign, lower volume compared to 2018, prices were high and continued to be high (high demand). At the time of the meeting, lower exports, which have recovered but the situation was worrying in mid-May. End-of-campaign stocks were low. B) For the subgroup stone fruit (8 June): consensus that past marketing campaign had high pressure on prices. This year, EU production was particularly low, due to weather conditions and a reduction of surfaces in Italy and Spain. At the time of the meeting, promising prices for the season. C) Regarding the subgroup tomatoes (24 June): took stock of reasonable production during the winter campaign, and 10 percent imports from Morocco. Winter in ES showed low volumes, with production turning towards other products and extending into spring and summer. Average price is relatively low, due to internal EU competition and some pressure also from imports. Experts were asked to make progress on the ongoing reflection to revise the EU weighted average for the price of tomatoes – to have a proposal to have a reasonable solution reflecting market. Spike in fresh tomato prices in France at beginning of COVID crisis. All the meetings also discussed impact of COVID on the various sectors. All presentations and agendas, reports from Observatory are published on the Commission market observatory website. As of first of January, Member States will report a wider range of prices than in past years, in application of the Market Transparency Regulation.

Comments and questions from CDG members:

- EC COM taking into account duties: EC does not have disaggregated data on duties charged by MS related to fruit and veg imports, not part of the observatory mandate.
- About reporting organic prices : only MS producing 4 percent or more will be reporting selling prices of organic tomatoes, apples, oranges, peaches and nectarines.
- Regarding price reporting, stakeholders would like that there is a distinction between 2 types of calibres and that there is a weighing depending on MS production in the calculation of the EU average price, otherwise the monitoring is distorted. Stakeholders would also recommend that the Commission verifies values provided by MS.

b) Brexit -state of play: Negotiations started on 2 March for most topics under the Political Declaration. Negotiations have continued on an online format. The EU Commission put forward mid-March a proposal for an agreement for a future partnership. There remain serious differences in key areas like fisheries, governance and level playing field. With transition ending on 31 December 2020, the two parties intensified pace of negotiations during the summer to ensure progress across areas. However no progress has been made until now in key areas like level playing field or fisheries, which makes progress on other areas impossible. We have to finish this agreement by October to ensure the ratification process in time. Unless the UK government changes its position reaching an agreement is difficult. The EU Commission remains that there will be no economic partnership without open and fair competition (environment, state aid, etc.) and a long term sustainable solution for fisheries and an effective dispute settlement mechanism. The Commission confirms it is ready to offer the most ambitious trade agreement to the UK in history with 0 tariffs and quotas.

Question from CDG members on organics: UK control bodies have applied for recognition to continue exporting to the EU. UK should continue at least for now for a transitional period to accept EU organic produce, this is to be confirmed by the UK authorities as other SPS matters

c) USA – conflict Boeing Airbus: The Commission explained that following a WTO decision authorising the US to retaliate vis à vis the EU for 7,49 billion USD of trade (Airbus subsidies case), the US imposed in October 2019 additional tariffs on a list of EU products. The list included tariffs of 10% ad valorem on new aircrafts from the four Airbus producers Member States (DE, FR, SP and UK) and tariffs of 25% ad valorem on a list of industrial, fisheries and agricultural products mostly, but not only, from the four Airbus producers MSs. With regards to the F&V products included in the list, the possible impacts were estimated at around EUR67M which corresponds to the value of exports to the US in 2018 i.e. a full year without the tariffs disruption. The impacts are then considered quite small (especially if compared to other sectors) also given the low F&V trades with the US which are still somewhat limited by numerous SPS barriers.

The US made two subsequent revisions of the list. The latest took place in August 2020 (with effect as of 1 September) which did not modify the tariff rate but introduced changes on the basket of products for a few agricultural goods. Certain cheeses from Greece and sweet biscuits from the UK were removed from the list, while certain jams from France and Germany were included. The exports of jams to US for France is worth around 50-60M EUR per year and for Germany 7M-8M for year representing around 70% of total EU27 exports to the US in terms of value and 50%-60% in terms of quantities. The Commission explained that the objective is to find a commonly agreed solution with the US that would put an end to the WTO civil aircraft disputes.

- **Next steps :** The Chair to provide draft minutes within 10 days
- **Next meeting :** No date has been scheduled for the next meeting

- **List of participants - Annex**

Disclaimer" The opinions expressed in this report represent the point of view of the meeting participants from agriculturally related NGOs at community level. These opinions cannot, under any circumstances, be attributed to the European Commission. Neither the European Commission nor any person acting on behalf of the Commission is responsible for the use which might be made of the here above information."

List of participants– Minutes

***Civil Dialogue Group HOS -FRUITS AND VEGETABLES SECTORS »
25 September 2020***

ORGANISATION	N° OF DELEGATES
European agri-cooperatives (COGECA)	8
European Coordination Via Campesina (ECVC)	2
European Council of Young Farmers (CEJA)	1
European farmers (COPA)	8
European Federation of Food, Agriculture and Tourism Trade Unions (EFFAT)	1
European Liaison Committee for Agriculture and agri-food trade (CELCAA)	3
FoodDrinkEurope (FoodDrinkEurope)	4
International Federation of Organic Agriculture Movements EU Regional Group (IFOAM EU Group)	2
Pesticide Action Network Europe (PAN Europe)	1
SACAR - Secrétariat des Associations du Commerce Agricole Réunies / Joint Secretariat of Agricultural Trade Associations (SACAR)	7