



REVISION OF BREAKFAST DIRECTIVE

Civil Dialog Group Fruit & Vegetables

20 NOVEMBER 2023



European Association of Fruit and Vegetable Processors

Vegetables

- Canned vegetables
- Frozen vegetables
- Dehydrated vegetables



Fruit

- Canned Deciduous Fruit
- Jams, Fruit preserves, Purees & Compotes
- Frozen Fruit



Key figures

- Total Production: 7 Million T
 - processed vegetables: 5.5 Million T
 - processed fruit (excl. frozen fruit): 1.5 Million Ton
- Turnover: around €25 billion
- Employment: more than 80.000 people



... part of the Review of “Breakfast directives” proposal COM (2023)201

Two key points of concern for European Jam Producers

1. Fruit Content increase → Commission’s proposal

2. Mandatory Country of Origin Labelling for fruit and sugar in jams → currently proposed at European Parliament level



1. Revision of Jam Directive: Fruit Content

INCREASE OF FRUIT CONTENT PROPOSED BY COMMISSION:

- Standard jam min fruit content increase from **350 g to 450 g per kilo**
- Extra jam min fruit content increase from **450 g to 550 g per kilo**

For the sector **PROBLEMATIC** on several levels:

- **negligible health gains**
- **less sustainable**
- **negative economic impact**



NEGLIGIBLE HEALTH GAINS

Jams = fruit + sugar, boiled to set point; consumed as an ingredient

More fruit does not make traditional jams – a concentrated product - “healthier”, as the extra fruit (90% water) means that the water needs to be boiled off to reach set point

- increased fruit intake for the average EU citizen (based on an average yearly consumption of 1,5 kg jam per person): **150 g PER YEAR**
- sugar intake reduction (based on the same average yearly consumption): **Less than 5 grammes PER YEAR**
- The savings of free sugars would be negligible

“Healthier and more sustainable legislation”?



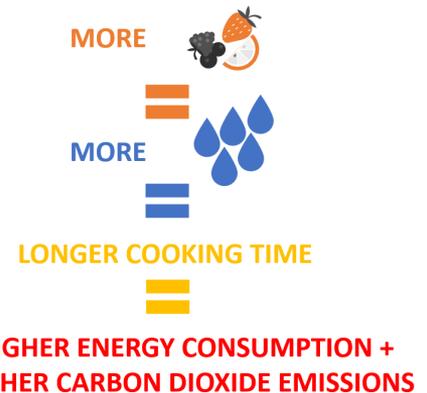
Increasing Fruit Content: More sustainable?

SUSTAINABILITY

- Increasing the fruit content would lead to **increased energy consumption during production:**

more fruit → higher water input in the recipe → requires greater water evaporation → longer cooking time

- undermines the sector's decarbonisation efforts



TASTE/Organoleptic properties

- Longer cooking time for **extra jams: deterioration** of colour, flavour and texture, and massive interference in well-established recipes (adverse effects on texture and chunkiness)



ECONOMIC

- Increasing the fruit content by more than 22% for extra jams and 29% for standard jam increases costs:
 - “new” categories would become more expensive (fruit + energy costs)
 - resulting in **price increases for consumers**
 - For standard jams, price sensitive sectors (food services, hospitals , school kitchens, canteens, caterers) could **switch to alternative** products outside the category
- OVERALL: risk to move more products outside the scope of the jam directive



... part of the Review of “Breakfast directives” proposal COM (2023)201

Two key points of concern for European Jam Producers

1. **Fruit Content increase** → Commission’s proposal

2. Mandatory Country of Origin Labelling for fruit and sugar in jams → currently proposed at European Parliament level



2. Country of Origin Labelling

Mandatory Indication of the Country of Origin for fruit and sugar in jams: currently proposed at European Parliament level

Jam producers highly alarmed:

- origin labelling for **jams and fruit juices** was at no stage included in the scope of the proposal (only for honey)
- it was not covered by the impact assessment
- no public stakeholder consultation took place
- crucial questions such as **sustainability aspects/food waste, technical feasibility, and what costs it would trigger** were not assessed



Technical Feasibility and Implications

Jams are made from a **blend of fruit origins and packings**. Usually at least 3 origins, often 5 and more:

- Blending = essential to ensure consistent taste (throughout the seasons, and during the course of a season or crop year)
- each lot of fruit → distinct characteristics: manufacturer adjusts blending to meet the quality parameters of each lot.
- Consequently: **specific blending may change for each production run.**
- Already for single fruit jam = highly challenging and costly
- For products made of two or more fruits (i.e. "fruits of the forest" jam): adjusting labels and maintaining a stock of labels with different percentages and origins for each ingredient is impossible.



Mandatory Country of Origin Labelling

Example apricot jam

first (of twenty) cooking runs of a day = 72% apricots from Hungary, 28% apricots from Bulgaria, 100% sugar from Germany;
second cooking run = 52% apricots from Hungary, 48% apricots from Serbia, 50% sugar from Germany, 50% sugar from France...

- A typical jam producing company would face **approximately one hundred interruptions of the production process per day due to label change.**
- = several thousand interruptions per year, with (totally avoidable) waste of products and energy, resulting in +/- one month's loss of productivity per year
- Furthermore: practical limitations, such as the limited space available on the back-of-pack label for some products
- Sugar comes from silos and percentage-based origin labelling plainly impossible



Technical Feasibility and Implications

- Fruit in jams comes from many different origins:
 - ➔ example strawberries - more than 10 countries of origin
- Fruit = subject to fluctuations, and their supply depends on climate, weather, geography, quality and prices:
 - raw material supply necessitates flexible alternative sourcing, last minute sourcing changes are frequent
 - **The need for sourcing flexibility has been aggravated over recent years by climate change!**



Food Information to Consumers (FIC) Regulation: Article 26.

- Commission report 2015 on the mandatory COOL looked at
 1. single ingredient products;
 2. unprocessed products
 3. ingredients that represent more than 50 % of a food

Assessed “*the **need for the consumer to be informed, the feasibility of providing the mandatory indication of the country of origin or place of provenance and an analysis of the costs and benefits***”

- Report concluded that for **products such as jams and juices, origin labelling should stay voluntary.**
- **Review of FIC regulation (“Farm-to-Fork”) under way:** These ongoing works should not be pre-empted.



In a nutshell

- Our companies – many of them SMEs – are extremely worried
- If adopted: enormous negative impact on our sector and prices
- If an origin indication is to be recommended it should be made **voluntary and left to the choice of producers, depending on market demand and technical feasibility**, in line with the existing legislation.
- If adopted by EP, we call upon Commission to use its voice in the Trilog to call for an impact assessment and proper consultation process

Thank you!

