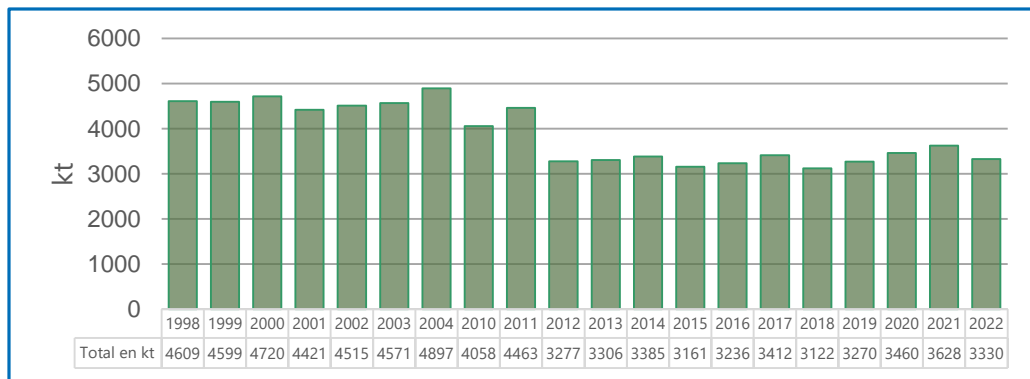
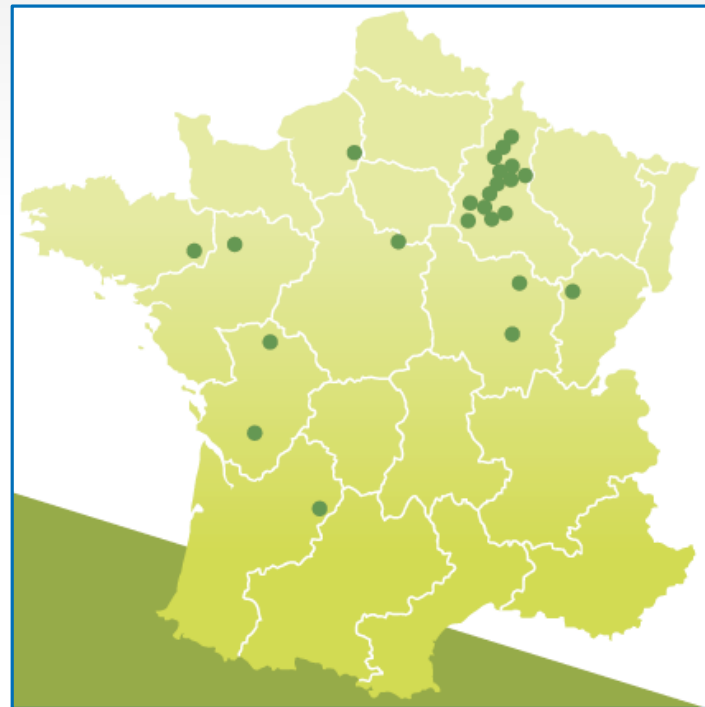


➤ Cooperative/PO presentation (about the cooperative/producer organisation, history and main activities)

- **6 500 farmers**, 10 cooperatives and subsidiaries, 24 factories located in half of the french metropolitan territory;
- **70 000 ha** dedicated to dehydration process in 2022 (dynamism of the surfaces maintained by the greening of CAP (direct payments);
- **750 000 tons** of annual production representing 7.5% of the french national production of protein-rich materials (animal feed).



Panorama of production in the EU – the three main producers are Spain (39%), Italy (28%) and France (23%)



Location of dehydrated alfalfa production areas in France

➤ Cooperative/PO main objectives and activities

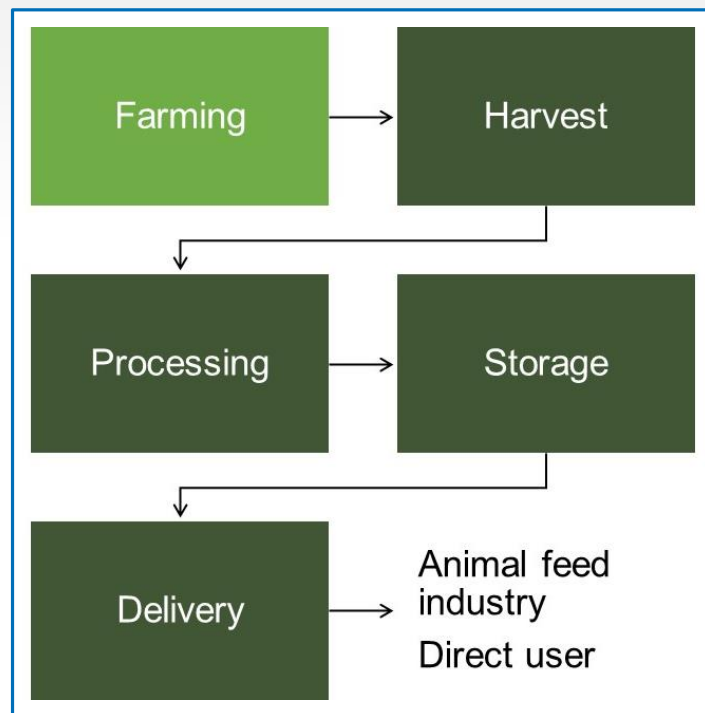
- **Producing quality fodder** (digestible fibers, rich in protein, GMO-free) for several markets including dairy cows, goats, sheep, rabbits, horses). High level of diversification needed to enhance production, create value for the producers;
- Main French outlets are the **manufacture of compound feed** (36%) and **feed on the farm** (34%). 70% of the production consumed in France, 25% in the EU and Switzerland. Exports limited to some high added value products;
- Products are pellets (65-70%), bales (30-35%) or protein concentrate (<1%). 15% are certified organic (stable).



Fibers and pellets of dehydrated alfalfa (left), harvesting equipment and processing plant (right)

➤ Cooperative/PO main objectives and activities

- **agro-industrial sector** established in rural areas with outlets at the service of producers;
- continuous improvement approach to **sustain the competitiveness and sustainability** of production methods;
- **positive carbon balance from the field to the factory outlet** (decarbonation of dehydration process active in the whole factories);
- contribution of alfalfa culture to the **agroecological transition**:
 - *ordinary biodiversity, ecological haven*: perennial plant as a refuge and pantry for micro and macro fauna, flowering from April to October as a bee resource;
 - *water quality*: no nitrogen supply and reduced leaching, few phytopharmaceuticals (1 weeding in 3 years of implantation), limitation of soil erosion;
 - *agroecology capacities*: supply of nitrogen to the next crop, soil structuring.



The activities of the cooperatives cover each step of production excepted farming

➤ Description of actions the cooperative/PO would undertake with the OP, rationale, and expected outcomes

- dried fodder are included to the chapter 4 of regulation (EU) No 1308/2013 of 17 December 2013 establishing a common organisation of the markets in agricultural products:

PART IV	
Dried fodder	
The dried fodder sector shall cover the products listed in the following table:	
CN code	Description
(a) ex 1214 10 00	- Meal and pellets of lucerne artificially heat-dried
	- Meal and pellets of lucerne otherwise dried and ground
ex 1214 90 90	- Lucerne, sainfoin, clover, lupins, vetches and similar fodder products, artificially heat-dried, except hay and fodder kale and products containing hay
	- Lucerne, sainfoin, clover, lupins, vetches, honey lotus, chickling pea and birdsfoot, otherwise dried and ground
(b) ex 2309 90 96	- Protein concentrates obtained from lucerne juice and grass juice
	- Dehydrated products obtained exclusively from solid residues and juice resulting from preparation of the abovementioned concentrates

the whole chapter is included for intervention *'operational programs for the other sectors'*

including alfalfa pellets

including bales of alfalfa

including concentrate of proteins

➤ Description of actions the cooperative/PO would undertake with the OP, rationale, and expected outcomes

- interventions selected are listed in the regulation (EU) 2021/2115 of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans):

- **(a) investments in tangible and intangible assets, research and experimental and innovative production methods and other actions, in areas such as:**

- ✓ *(i) soil conservation, including the enhancement of soil carbon and soil structure, and the reduction of contaminants* ► experimentation to evaluate carbon storage under alfalfa;
- ✓ *(iii) preventing damage caused by adverse climatic events and promoting the development and use of varieties, breeds and management practices adapted to changing climate conditions* ► variety and cultural technics trials for climate change adaptation;
- ✓ *(iv) increasing energy saving, energy efficiency and the use of renewable energy* ► advanced biomass injectors in oven to improve biomass combustion of wood chips or another sourced biomass;



Biomass injectors need to be generalized into the factories

➤ Description of actions the cooperative/PO would undertake with the OP, rationale, and expected outcomes

○ (a) investments in tangible and intangible assets, research and experimental and innovative production methods and other actions, in areas such as:

- ✓ (vi) *biosecurity, animal health and welfare* ► incorporation of alfalfa in animal rations for animal welfare (hens stinging, pigs codophagy);
- ✓ (viii) *improving resilience against pests and reducing risks and impacts of pesticide use, including implementing Integrated Pest Management techniques* ► specific materials to improve alternative weeding technics (e.g., spring tine harrow);
- ✓ (x) *creating and maintaining habitats favourable to biodiversity* ► payment for environmental service to non-reaped strips of alfalfa;
- ✓ (xi) *improving product quality* ► enhancing innovation in factories;
- ✓ (xii) *improving genetic resources* ► varietal research and trials to select climatic change resilient species;
- ✓ (xiii) *improving the conditions of employment [...] health and safety requirements* ► equipment to attenuate dust exposition in factories.



Spring tine harrow (top) & non-reaped strips of alfalfa (down)

➤ Description of actions the cooperative/PO would undertake with the OP, rationale, and expected outcomes

- **(b) advisory services and technical assistance [...] sustainable pest and disease control techniques, sustainable use of plant protection and animal health products, climate change adaptation and mitigation, the conditions of employment, employer obligations & occupational health and safety:**

- ▶ technical support provided in particular by the staff of the producer organization or by service providers on agronomical competences;

- **(f) promotion, communication and marketing including actions and activities aimed in particular at raising consumer awareness about the Union quality schemes and the importance of healthy diets, and at diversification and consolidation of markets:**

- ▶ symposium or international congress organisation to promote alfalfa and develop worldwide scientific knowledge on the culture;

- **(h) implementation of traceability and certification systems [...] the monitoring of the quality of products sold to final consumers:**

- ▶ certification & control analysis to support the upscaling of products.



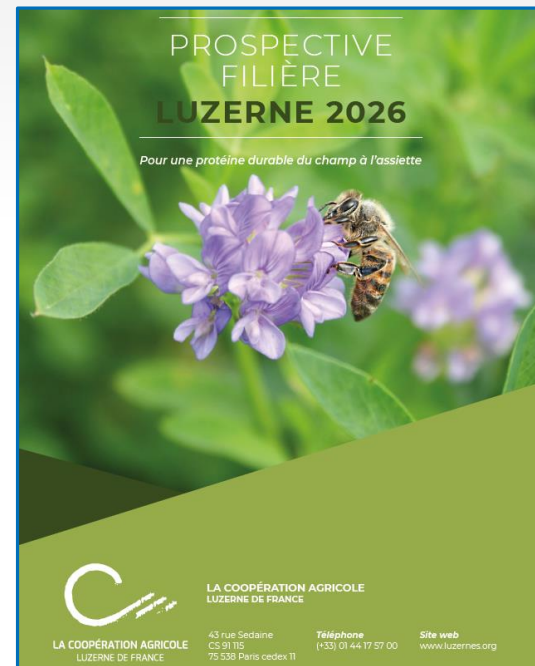
Symposium 2020 (top) & certificated product (down)

➤ Factors hindering the application of OP by the cooperative/PO (e.g., administrative burden)

- access to OP is facilitated for the alfalfa dehydration sector as it is made up exclusively of cooperatives, which are a PO. Nevertheless, **a difficulty exists concerning subsidiaries to benefit of PO as these don't have the same status;**
- **reconcile the existing organization of the sector with the constraints linked to the establishment of a producer organization** is subject to some complications. For example:
 - some cooperatives practices alfalfa plots exchange to deal with historical belonging. **They have double members who deliver alfalfa to each one**, adhere enter them to optimize the geographical management of the plain;
 - all the cooperatives are producing other products than alfalfa as a diversification (e.g., sugar beet pulp during the fall, wood pellets during the winter). **This makes the purchase of certain essential materials ineligible** as it requires strict separation to control the rate of use for each product;
 - two sectors cohabit around the same culture: alfalfa to be dehydrated and alfalfa wilted in the farm which is not the same product, don't have the same markets. **This induces trouble to establish relevant supply criteria;**
- commercial production value is calculated on historical criterias for existing PO. A derogation exists for new organizations **but not for an existing organization which should have been significantly modified to reach the PO status;**
- disposing of a closed envelope **doesn't make it possible to open the widest choice of interventions to respond to the individual strategy of each cooperative** within the framework of the objectives set by the EU regulation.

➤ How the cooperative/PO is organised to exploit the opportunities deriving from the OP

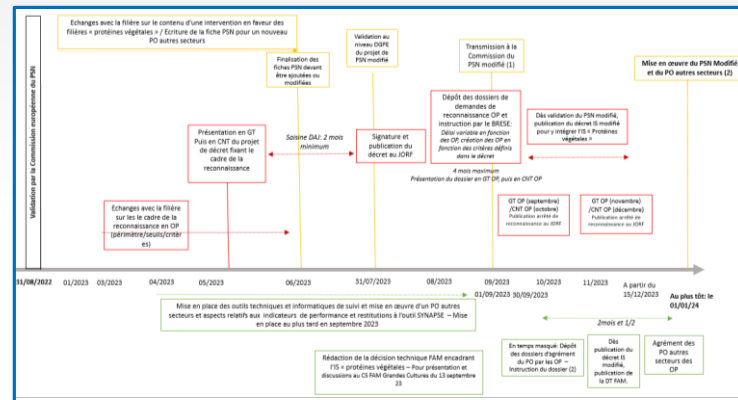
- to be recognize as a PO, **each cooperative benefits of a legal support from its national representation** to assess the necessary modifications of status and demonstrate that its governance is ensured by the producers;
- to reconcile the existing organization of the sector with the constraints linked to the establishment of a producer organization, **recognition can be brought by a union of cooperatives** (e.g., storage union of cooperatives to mutualize silos):
 - this allows storage facilities to benefit from OP;
 - this concentrate all the flows of products on the same organization, so that the sector demonstrates that's this tool is online with structural objectives;
- each cooperative being a member of the national representation **has contributed to the establishment of a national sector plan** which constitutes a basis to open interventions which are coherent with its strategy. This prospective includes:
 - *environmental performance* : biodiversity, climate change mitigation, etc.;
 - *nutrition and animal welfare* : products segmentation, diversification, etc.;
 - *socio-economic performance* : feminizing instances, youth support, etc.



Luzerne 2026 is the french national sector plan for dehydrated alfalfa production

➤ Role of National Authorities in informing and supporting the cooperative/PO

- the ***French ministry of agriculture*** is leading the different phases to define recognition for other sectors including dried fodder, selects interventions in accordance with the national representations;
- ***FranceAgrimer*** office will decline the modalities of implementation and control for each selected intervention, need to qualify relevant indicators which must be written in a national decision;
- **this induces three parallels ways of work to start OP in January 2024:** a recognition way (red), an intervention way including CAP strategic plan modification (yellow), an implementation way (green).



Crossed working plan (for illustration)

- **recognition way:** this includes to establish decree of recognition for each sector, defining relevant criterias. Dried fodder decret is under finalization. Last steps consist to deal with existing obligatory contractual supply from direct payments and the separation from the farming sector. A technical commission should approbate it in June;
- **intervention way:** interventions are selected conforming the CAP strategic plan regulation. Intervention sheets are under finalization to be proposed at the EC as a modification of french one. Validation need to be done in December;
- **implementation way:** this work will start in June as it needs to dispose of a first version of intervention sheets.