

Study on agricultural interbranch organisations (IBOs) in the EU

AGRI-2015-EVAL-13

National Legislation and Actions concerning IBOs

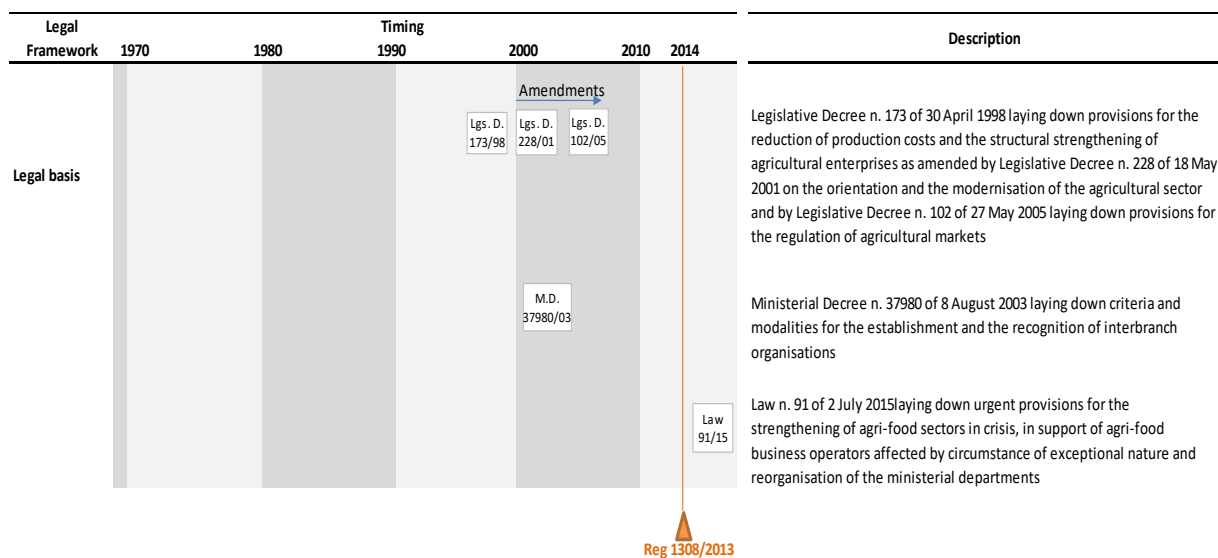
ITALY

Date of last update: 01 June 2016

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[Section 1: National legislation pursuant to Articles 157- IBOs, 158- Recognition of IBOs, 159 and 162 – Recognition of IBOs in the olive oil, table olives and tobacco sectors and 163- Recognition of IBOs in the milk and milk products sector of the CMO Regulation](#)

Figure 1: Legal basis for the recognition of IBOs in Italy



Source: Compiled by Arcadia International E.E.I.G.

Summary of national legislation on IBOs

In Italy national legislation governing the establishment and the functioning of interbranch organisations (IBOs) dates back to 1998. Effective as of 20 June 1998, **Legislative Decree n.173 of 30 April 1998** laid down a set of provisions aimed at strengthening agricultural competitiveness at national level, including greater economic integration of the food chain through the setting up of IBOs. Following its adoption, Legislative Decree n.173/1998 was amended twice with regard to the legal framework applicable to IBOs through the adoption of **Legislative Decrees n.228 of 18 May 2001** (Article 25) and **n.102 of 27 May 2005** (Article 16 par. 5 and 6). **Ministerial Decree n. 37980** of 8 August 2003 subsequently completed the national legal framework for IBOs by laying down criteria and modalities for their establishment, recognition, supervision as well as extension of their rules to non-members.

The legislative framework for IBOs was reviewed in 2015 when national measures in support of certain agri-food sectors in crisis, among which the milk and milk product sectors, were discussed. This ultimately led to the adoption of **Law n. 91 of 2 July 2015**. The latter ensured the alignment with Regulation (EU) No 1308/2013 as far as provisions regarding IBOs are concerned and repealed all legal requirements previously in force at national level. **Article 3 of Law n. 91** contains now the reference legal framework for IBOs in this Member State.

IBOs: definition, objectives and legal status

Whilst prior national legislation in force provided a definition of IBO, including the activities that such entities may pursue (Article 12 par. 1 Legislative Decree 173/1998), the new framework adopted in July 2015 simply stipulates that **IBOs are organisations complying with the relevant EU requirements**. Moreover, with regard to IBOs' composition, national law now specifies that IBOs may integrate in their membership consumer organisations and workers trade unions in the agri-food sector with a **consultative status** (Article 3 par. 1 and 7 Law 91 of 2 July 2015).

As to their legal status, recognised IBOs have the form of **associations**, that is non-profit organisations.

IBOs' recognition and monitoring

National legislation currently in force allows for the recognition of a **single IBO** per sector, product or product category at **national level** or **at the level of a single economic area**. Should there be more requests of recognition for the same sector, product or product category, the recognition is to be granted to the organisation with the highest representativeness (Article 3 par. 2 and 7). Similarly, should a request of recognition be introduced from an organisation with higher representativeness as opposed to that of an IBO that has already been recognised, the latter will see its recognition withdrawn (Article 3 par. 8).

In order to obtain recognition, interested organisations must prove to account for a **significant share of the economic activities** that are represented within their membership pursuant to Article 158 par. 1 point c) of Regulation (EU) No 1308/2013. Regarding organisations operating at national level, the share in question must correspond, at least, to **40%** of the economic activities of the relevant sector or market segment for each product or product category. In the case of organisations operating within a single economic area, the share of the economic activities must correspond to at least **51%** of the respective economic activities in that area and, in any event, to **30%** of such activities on a national level (Article 3 par.7).

Representativeness criteria for the purpose of recognition are lower in the case of the **milk and milk products sector**. In case of organisations at national level, the share of the economic activities represented by the IBO must be equal to or higher than **25%** of the relevant sector or market segment. For organisations operating in a single economic area, the threshold is **51%** with respect to said area and **15%** at national level (Article 3 par.1).

The Ministry for Agriculture, **Food and Forests Policies (MIPAAF)** is the competent authority responsible for granting recognition to IBOs through a ministerial order. The recognition must be granted following the agreement of the Standing Conference for the relations between the State, the Regions and the Autonomous Provinces of Trento and Bolzano. Overall, MIPAAF must perform the tasks that Article 158 par. 5 Regulation (EU) No 1308/2013 attributes to competent authorities in relation to IBOs, which includes, among others, supervision of such entities, application of sanctions as well as withdrawal of recognition. MIPAAF has the same responsibilities with regard to IBOs in the milk and milk product sector pursuant to Article 163 par. 3 to which national legislation explicitly makes reference (Article 3 par. 2 and 8).

IBOs' agreements and extension of rules

The IBOs that are recognised pursuant to national law may request MIPAAF to approve, for a **limited period of time**, the extension of rules set out in their agreements or decisions to non-members.

As a rule, MIPAAF must take a decision on the granting of the extension within two months from the request or three months in case there has been an opposition. In the absence of an explicit reply, the request of extension of rules must be considered rejected (Article 3 par. 4).

Once the extension is granted, the IBO's rules concerned are **legally binding on all business operators** of the sector or of the market segment of the relevant product or product category. The Central Institute for food quality and food fraud repression (ICQRF), which is part of MIPAAF, is responsible for the proper **enforcement** of the extension of rules and the application of sanctions. Sanctions in the form of **financial penalties** may range **from 1,000 EUR to 50,000 EUR**, having regard to the seriousness of the violation. When a non-member does not comply with IBOs' rules regarding the application of standard contracts that regulate the purchase of agri-food products, the application of a sanction amounting to 10% of the value of the contracts concluded in breach of those rules is envisaged (Article 3 par.6).

Rules on financing

National law foresees that, together with the request of extension of rules, recognised IBOs may also ask for the **payment of a financial contribution** by non-members with a view to financing their institutional objectives and, in particular, the promotion of the relevant sector, product or product category. The limits set by Article 165 Regulation (EU) No 1308/2013 apply in this context. (Article 3 par. 3).

Representativeness

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In order for the extension to be granted, the following representativeness conditions must be fulfilled:

- a) The rules for which the extension is sought for must have been endorsed by at least **85%** of the members of each professional branch that forms the IBO, unless the statutes of the organisation foresee higher thresholds;
- b) The IBO must be **representative** within the meaning of Article 164 par. 3 point ii) Regulation (EU) No 1308/2013. The IBO is **presumed to be representative** in this context if, following the publication of the request of extension on MIPAAF website, there is no opposition from organisations that can demonstrate to represent **more than one third** of the economic operators of the sector concerned (Article 3 par. 4 and 5).

Except for the representativeness criteria that must be fulfilled for the purpose of IBOs' recognition and for the extension of rules, there are no other specific requirements on this subject.

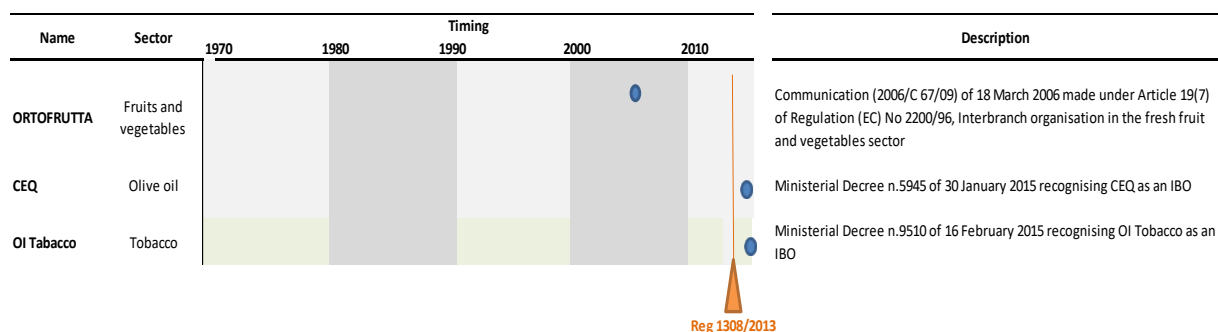
[Section 2: Other national legislation relevant to activities and operation of IBOs pursuant to Articles 157 –IBOs, 158 – Recognition of IBOs, 159 \(b\) and 162 – Recognition of IBOs in the olive oil, table olives and tobacco sectors and 163- Recognition of IBOs in the milk and milk products sector of the CMO Regulation](#)

National law currently foresees that recognised IBOs may have access to **public funding** with a view to pursuing their activities (Article 3 par. 3 last sentence). However, to date there has been no specific budget line explicitly established to support IBOs in the achievement of their organisational objectives.

There are no specific rules at national level providing for exemptions or derogations from applicable competition law.

[Section 3: History and list of IBOs pursuant to Articles 157 –IBOs, 158 – Recognition of IBOs, 159 \(b\) and 162 – Recognition of IBOs in the olive oil, table olives and tobacco sectors and 163- Recognition of IBOs in the milk and milk products sector of the CMO Regulation](#)

Figure 2: List of recognised IBOs in Italy



Source: Compiled by Arcadia International E.E.I.G.

[Section 4: Use of the available legal framework for IBOs and other forms of cooperation between producers and other stages of the food supply chain established in the context of CMO Regulation](#)

Although national legislation on IBOs has been in place since 1998, the **uptake of IBOs** in Italy is **very low** as opposed to other Member States with similar agri-food sectors (e.g. France, Spain).

According to a study on this subject (Frascati, Salvati 2012), unlike France where IBOs are a long established collective instrument to manage the food chain, Italy lacks a comparable experience due to the overly **diverging political interests** that drive the action of food chain stakeholders and to the lack of shared economic goals. Therefore, the establishment of IBOs in this Member State would appear more a consequence of the adoption of IBO-related provisions at EU level rather than of a proactive stance of the food chain stakeholders.

Likewise, according to MIPAAF, the main reason behind the limited success of IBOs at national level primarily lies with the lack of willingness of the organisations representing

the different stages of the food chain to join forces under cross-sectoral structures. In particular, the conflicts between the organisations representing the production stage and their trade unions would have prevented primary producers from benefitting from the establishment of well-performing producer organisations, which are a prerequisite for the setting IBOs.

In addition to that, it should be noted that national law provides for the conclusion of interbranch agreements (*'intese di filiera'*) also outside the realm of recognised IBOs. Article 9 Legislative Decree n.102 of 27 May 2005, in fact, envisages the negotiation of interbranch agreements in the framework of dedicated **Ministry-led sectoral round tables** (*'tavoli di filiera'*). The agreements concluded in this context may consist, among the others, of initiatives aimed at improving the knowledge and the transparency of the market, the elaboration of standard contracts as well as promotion activities of protected designations of origin (PDO) and geographical indications (PGI). Some authors (for instance, Surace, 2008) consider that in this area the national legislature has not ensured the necessary consistency leading to an overlapping of competences that would have been detrimental to the development of effective and well-performing IBOs at national level. On the other hand, MIPAAF is the view that the two instruments are meant to coexist and work in parallel.

The above partly explains why, until now, the Italian competent authorities have formally recognised only **three IBOs** at national level, namely in the fruits and vegetables, olive oil and tobacco sectors. Nevertheless, MIPAAF is **particularly supportive of the IBO model** as a self-regulation instrument for the governance of the agri-food chain. In MIPAAF's view, IBOs are even more important now that public financing at EU level has ended in certain sectors.

Therefore, in order to facilitate the setting up of IBOs, through the adoption of Law 91 of 2 July 2015 the **minimum representativeness thresholds** for the establishment and the recognition of IBOs have been **lowered** to 25% and 40%, respectively, for the dairy sector and for all the other sectors, as opposed to the national legislation previously in force.

Amongst the novelties introduced by the new law, it is also worth noting that IBOs may now be established at national level as well as when they operate in specific economic areas. This means that also IBOs operating at **regional level** or **across different regions** may be now recognised pursuant to national law.

Whilst this new requirement aims at facilitating the creation of IBOs below the national level, it is also intended to clarify once for all that the competence for IBOs recognition lies solely with the national competent authorities (i.e. MIPAAF). In this respect, it should be mentioned that the **Emilia-Romagna Region** has had in place for several years a regional law regulating the establishment of producer organisations and IBOs (**Regional Law n. 24/2000**). Based on this legislative regional framework, over the last few years the competent authorities of Emilia-Romagna have granted IBO's recognition to four organisations for the following products:

- tomato for processing;
- pork meat;
- poultry meat; and
- pears.

Yet, the national competent authorities have never recognised officially those IBOs, which, in fact, they regard as **non-existing**. According to MIPAAF, the new framework that is now in place may eventually prompt the existing regional IBOs that wish so to request official recognition at national level. The IBO covering tomato processing which operates across four regions (Emilia-Romagna, Lombardy, Veneto and Autonomous

Province of Trento and Bolzano) has expressed interest in being granted national recognition and may be the first among the regional IBOs to obtain it.

As regards the three existing national IBOs, OI Tabacco and CEQ were formally recognised under the legislation previously in force and their recognition was confirmed by the new framework adopted in 2015. On the other hand, ORTOFRUTTA, whose recognition is based on prior EU legislation on the common market organisation for fruits and vegetables, is now in the process to obtain formal recognition pursuant to the new national requirements laid down in Law 91 of July 2015.

Regarding the national experience in the **conclusion of IBOs' agreements**, this is also recent and thus limited. The most recent IBO's agreement was negotiated within OI Tabacco in April 2015, which established a comprehensive framework for the conclusion of cultivation contracts of raw tobacco and minimum quality requirements for such product. Applicable for three marketing campaigns from 2015 until 2017, the agreement was approved and its rules extended to non-members by MIPAAF through Decree n. 2859 of 7 August 2015 as modified by Decree n. 2988 of 3 September 2015. The agreement in the tobacco sector is the first one to receive the endorsement from the Italian competent authorities following the adoption of the new national framework in 2015.

The national IBO for the fruit and vegetables sector ORTOFRUTTA has also promoted the conclusion of agreements over the last few years, for instance, on kiwi (2013/2014, 2014/2015), fruit juices from citrus fruits (2015) and melons (2015). The most recent IBO agreement regarding kiwi was the first case at national level in which the extension of rules was granted. In the case of fruit juices, the extension of rules was granted on 2 April 2015 and limited to that year. Despite that, the agreement did not produce any effects on the fruit juice sector: following the notification of the agreement to the European Commission, the latter considered the notification not compliant with the time limits set by Article 210 of Regulation (EU) No 1308/2013 for this purpose.

With regard to the other forms cooperation that are currently foreseen under Regulation (EU) No 1308/2013 for certain products, it should be noted that Italy has so far implemented national provisions **only with regard to the regulation of the supply of ham and cheese covered by EU quality schemes**. Pursuant to Articles 150 and 172 of that regulation and national implementing measures (i.e. Ministerial Decrees n. 15169/2012 and n. 6349/2014), the following legal acts have been adopted:

- a) Ministerial Decree n.1457 of 11 February 2014 laying down provisions for the regulation of the supply of the PDO cheese '**Asiago**' (applicable until 31 December 2016)
- b) Ministerial Decree n. 2700 of 14 March 2014 laying down provisions for the regulation of the supply of the PDO cheese '**Grana Padano**' (applicable until 31 December 2015);
- c) Ministerial Decree n. 5623 of 26 May 2014 laying down provisions for the regulation of the supply of the PDO cheese '**Parmigiano Reggiano**' (applicable until 31 December 2016);
- d) Ministerial Decree n. 3178 of 18 May 2015 laying down provisions for the regulation of the supply of the PDO ham '**Prosciutto di San Daniele**' (applicable until 31 December 2017);
- e) Ministerial Decree n. 4453 of 31 July 2015 laying down provisions for the regulation of the supply of the PDO ham '**Prosciutto di Parma**' (applicable until 31 December 2017);
- f) Ministerial Decree n. 1831 of 9 March 2016 laying down provisions for the regulation of the supply of the PDO cheese '**Pecorino Romano**' (applicable for three years from the publication of the decree).

[Section 5: National practice concerning Article 210 CMO Regulation and decisions of competition authorities/national courts on the compatibility of IBOs activities/practices with national competition law](#)

To date the national **Competition and Market Authority (AGCM)** has not dealt with any case or complaint involving IBOs in the agri-food sector. It has however been consulted a few times in the past by other public authorities (e.g. MIPAAF, Lombardy Region) with regard to the lawfulness of agreements concluded between producer organisations and processor organisations involving fixing of prices. Against this background, AGCM has consistently drawn the attention of the authorities seeking its advice to the restrictive effects that such agreements have on competition.

This view has been recently restated by AGCM in a report following an investigation on the national milk and milk products sector (**AGCM report n. 25899 of 2 March 2016**). More precisely, following the application of the new regime for the contractual relations in the milk and milk products sector pursuant to Regulation (EU) No 261/2012, now integrated under Regulation (EU) No 1308/2013, AGCM has expressed its support for the recognition of IBOs promoting initiatives aimed at improving the efficiency of the relevant product chain. In this context, AGCM points out that, whilst IBOs cannot fix the economic conditions for product sale, such entities are nevertheless entitled to perform other activities including, for instance, the drawing up of standard contracts.

[Section 6: Literature](#)

- National Legislation

IBOs

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Ministerial Decree n.5945 of 30 January 2015 recognising CEQ as an IBO
<https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/8322>

Ministerial Decree n.9510 of 16 February 2015 recognising OI Tobacco as an IBO
<https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/8322>

Extension of rules

Ministerial Decree n. 2858 of 7 August as modified by Decree n.2988 of 3 September 2015 granting the extension of rules to the IBO agreement for the years 2015, 2016 and 2017 in the tobacco sector
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Ministerial Decree n. 4203 of 24 October 2014 granting the extension of rules on the IBO agreement on kiwi for the marketing campaign 2014-2015
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Other forms of cooperation

Ministerial Decree n. 15164 of 12 October 2012 regarding producer organisations and their associations, interbranch organisations, contractual relations in the milk and milk products sector and supply regulation plan of PDO/PGI cheese, Official Gazette n. 287, 10 October 2012
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<https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/7216>

Ministerial Decree n. 2700 of 14 March 2014 laying down provisions for the regulation of the supply of the PDO cheese 'Grana Padano' + approved supply regulation plan
<https://www.politicheagricole.it/flex/cm/pages/ServeBLOB.php/L/IT/IDPagina/7385>

Ministerial Decree n. 5623 of 26 May 2014 laying down provisions for the regulation of the supply of the PDO cheese 'Parmigiano Reggiano' + approved supply regulation plan
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Ministerial Decree n. 3178 of 18 May 2015 laying down provisions for the regulation of the supply of the PDO ham 'Prosciutto di San Daniele' + approved supply regulation plan
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Ministerial Decree n. 1831 of 9 March 2016 laying down provisions for the regulation of the supply of the PDO cheese 'Pecorino Romano' + approved supply regulation plan
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