



Freshfel Europe perspective on the management of promotion programme

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Cumulative programmes budget (2019-2021) of projects by above members for 2019-2021

- Multi programmes: €12.5m
- Simple programmes: €32.2m

Optimizing policy efficiency

- **EU coverage:** access to the policy should be with the best coverage of the EU
- **Product coverage:** Promotion policy open to all , need of indcrease budget and still further reinforce promotion activities that could reinforced an healthy plant diet, and further support F&V , a sector operating with tight margins but with unique health and environmental assets
- **Agriculture practice coverage:** the policy should have the largest market coverage based on the expertise of the beneficiaries → policy is too much restricted today to niche production segments for niche affluent consumers, hence with lower return on investment

Optimizing policy efficiency

- **Role of promotion policy:** essential tool for the F&V sector operating with low margins → policy to be further boosted to reach out the ambition towards a “plant diet”
- **Communication :** timely and detailed information about programmes is needed → key to build synergies with other initiative of the sector or with Commission Own Initiative
- **Efficiency:** reflection needed on the promotion policy and identification of origin and other brand → stick to visuals than impact on consumers

Application process: challenges of writing the proposal

- **Timing:** evolving criteria that reflect the Commission's strategic priorities rather than existing legislative requirements → timely and complete information need to be provided on the AWP – decision in October
- **Anticipation of the EU Info Days:** End January is too late to adapt the proposal to the recommended criteria
 - anticipated AWP decision in October and Infoday to November
 - earlier notification facilitate the building of multi programmes, which are lagging behind and more complex to set up
- **Stability of the award criteria:** yearly amendments make comparisons hard, while pages limit remains constant → more stability required to provide clarity regarding the relevance of the criteria

Application process: challenges of writing the proposal

- **Inconvenient of broadening the scope of award criteria:** with the additional criteria added overtime, the number of pages for submitting the proposal are becoming too small, in particular for multi programmes & large consortia
 - spending pages to justify criteria leaves fewer pages to sustain the merit of the communication and promotion strategy of the programmes
 - demonstrating sustainability requires investment with uncertain return and support of a specialize Cie
- **Sustainability award criteria:** absence of clarity of actions that will be deemed sustainable in actions (e.g. paper usage, travel options, use of plastics) without guarantee how evaluators will interpret those efforts → applicants and evaluators should have clear guidance from Commission on what is relevant – uncertainties prevail

Application process: challenges of writing the proposal

- **“Sustainability”**: disproportionate role for a yet legally undefined criteria, with ambiguity for both applicants and evaluators and significant space taken away from other elements
- **Nutritional guidelines**: the compliance with the the national guidelines of all target countries result in contrasting objectives, too much space taken away from the rest of the proposal, and issues to justify pan-European activities
 - simple programmes targeting multiple MS
 - multi programmes with EU-wide outreach
- **Equal access to the information of the criteria between evaluators and applicants**
 - the same information should be provided

- **Independence of evaluators: Should be guaranteed by ensuring that**
 - Evaluators have no business relations with implementing agencies
 - Evaluators provide no consulting services to beneficiaries relating to the promotion policy
 - Evaluators with professional career or business links with agencies=> risk of being “pre-formatted” to certain agencies style, ultimately being discriminatory for newer, less established but innovative agency
- **More transparency concerning implementing agencies :** The Commission should disclose which agencies are running which programmes
 - This will provide more transparency of users of public money and open awareness of services of smaller agency in other MS ;
 - > information to be provided by COM : number of programmes run by agencies, by MS for a rolling period of 3Y , covering implementing agencies, graphic design and evaluation
 - > COM can not hide behind GDPR or lack of access to this information : REA and MS to inform

Management of the programme

- **Share of own activities run by beneficiaries**
 - contracting agencies, not always the most cost-effective option due to high fee of agencies
 - more clarity of the percentage of own activities to be run by the beneficiaries
 - clarity/cap to be set for management /coordination cost
 - secure “competitiveness” benefits of personal costs and overheads of the beneficiaries when compared to agencies rate and fee structure of agencies
 - more incentive could be given to the beneficiaries for more “in-house” activities, better reflecting the objective of the grant agreement and better awareness of the sector specificities rather than reflecting priorities or network of the agencies – no derogation for evaluation which need to be “out-sourced”
- **Discrepancies between multi and simple programme:** still many discrepancies
 - between multi and simple programmes
 - within simple programmes due to differences of interpretation & MS infrastructure
 - Case of distortion: feedback to questions, bank guarantees, kick off meeting, relation with the applicant (identified officer or not), notification of activities, portal for reporting, preselection of agencies

Management of the programme

- **Adapting to market conditions**

- Case of China: more support and flexibility needed to address adverse cases or market access issues

- Unspent budget:

- reallocation rules in case of crisis and COVID => flexibility to prolong the grant agreement taking into accounts seasonality and trade fair calendar

- secure that unused budget and other unused crisis reserve are properly reallocated within the policy and not left unused

Management of the programme

- **Controls and sanctions**

→ increasing concern on the consequences of audit and risk of a penalty resulting from Regulation 1306/2013

→ In some MS, following DG AGRI additional audits, fines up to 200% are considered to be applied on top of the costs. Fines are applied in line with the provisions of [Regulation 1306/2013](#) (Art 64) and [Regulation 2015/1829](#) (Art 5) .

→ The sanctions can be applied in case of rejected costs due to a decision by the audit of the non-eligibility of an expenditure. Exclusion of penalty given force majeure, error not at a fault, and minor nature of the dispute or discrepancy of interpretation should be considered

Freshfel is concerned of the lack of proportionality between the breach or “non-compliance” and the sanctions → proportionality, with due consideration to the non-compliance. Excessive application of sanctions could lead to a lack of interest for the policy.



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THANKS