Joint Committee on European Affairs


1. The Oireachtas Joint Committee on European Affairs wishes to thank the Commission for their invitation to national parliaments to submit their views and comments on Commission proposals received under the Barroso Initiative, including Green and White Papers. As part of this welcome initiative, the Committee has considered in great detail the Commission’s Green Paper on agricultural product quality: product standards, farming requirements and quality schemes. As part of this consideration, the Committee invited and received submissions from the key stakeholders in the Irish agri-food business sector, namely the Irish Farmers’ Association (IFA), the Irish Cattle and Sheep Farmers’ Association (ICSA), the Irish Creamery Milk Suppliers Association (ICMSA), Food and Drink Industry Ireland (FDII) and the Department of Agriculture, Fisheries and Food. The Committee also held in depth discussions with these stakeholders at two of its public meetings on 11 December 2008 and 15 January 2009. The Committee would like to thank these groups for their cooperation and very useful contributions.

2. The Joint Committee supports the efforts of the Commission to examine ways to better protect and promote the quality of EU agricultural products with the aim of creating a greater market advantage for EU farmers and food producers. The Committee agrees that as globalisation spreads products from emerging countries with low production costs are putting greater pressure on EU farmers. Therefore, it is important that the high quality of EU agricultural products is effectively and aggressively marketed in order to assist farmers and producers in facing these new commercial challenges. The Committee also agrees that any new measures which may flow from this Green Paper should not create additional costs or burdens for farmers, producers or regulators. Farmers already have to deal with significant regulation and any further regulation would only serve to undermine their competitiveness in the global market place.

3. There are concerns, however, that while the Green Paper focuses on the most suitable policy and regulatory framework for the quality of EU agricultural products, it ignores the level of standards in those developing countries with low production costs. It is felt that these countries have low standards in quality, product hygiene, food safety and traceability and do not take into account environmental and animal welfare issues. Their standards are well below the
high standards which apply to production within the EU. This should be a key policy issue for the Union that must be addressed. The EU food sector cannot be regulated or organised in any meaningful way without taking imports into account. It is therefore vital that the issue of food standards and production quality be addressed at an international level through the WTO.

4. The Joint Committee believes that communication is the key to making the consumer aware of the high agricultural product quality that exists in the EU. The consumer is often unaware of the efforts and changes made by farmers in order to elevate the quality of their produce. For instance, the introduction of the single farm payment also introduced onerous cross-compliance rules and strengthened traceability controls. In addition, many farmers have volunteered to improve their product quality and marketability by taking on further restrictions such as organic farming, GM free farming and participation in environmental programmes. This means farmers are now producing food that has a lot more value added at farm gate level and that offers consumers a choice of quality standards that are unsurpassed anywhere else in the world. This should be properly recognised and communicated to the consumer to ensure that farmers get more of a return on their efforts.

5. In this respect, the Green Paper correctly points to the need to ensure that additional quality aspects of EU food production are communicated effectively to the consumer and in a way that is accessible and easily understood by the consumer. The Joint Committee supports the idea of developing a policy and regulatory framework that builds on the existing framework in order to provide consumers with information on baseline farming standards while at the same time allowing for its extension into additional standards such as organic farming. Therefore, the labelling system should be flexible enough to cater for other quality attributes of EU agricultural products. This extended policy and regulatory framework should be cost effective and avoid placing additional administrative burdens on farmers and producers.

6. It is also clear to the Joint Committee that current EU food quality regulatory framework is not being effectively communicated to the public. The Commission should look at putting in place an awareness raising campaign with the aim of educating the public about the lengths farmers and producers must go to reach existing food quality standards and also about the current labelling regime, including the EU health mark. The Committee believes that this exercise should be undertaken and its results analysed before consideration is given to the provision of an additional EU quality logo. That said, the Joint Committee would not rule out at this stage the value of introducing an EU quality logo and believe that its added value should be assessed. Also, in this
context, the feasibility and benefit of labelling products from third countries as non-EU should also be examined. This initiative would support the principle of transparency.

7. The Joint Committee believes that an integral part of any new labelling strategy must include country of origin labelling as a basic requirement for any primary product. It does not accept the Commission’s claim that country of origin labelling would cause unfair competition. The primary concern must be to have labelling that allows the consumer to make a fully informed decision at the point of purchase. It should be possible to make the consumer fully aware of where the agriculture product they are buying originated from. The Joint Committee believes it is possible for a product to have a label that clearly indicates that it has originated in the EU, and has therefore passed the rigorous EU quality standards, and also indicates which Member State has produced the product.

8. The Joint Committee acknowledges that problems can arise in respect of mixed products. However, it would propose that a flexible system could be envisaged whereby the consumer could easily identify where the majority of a product’s ingredients were sourced. In addition, the issue of substantial transformation of agricultural products should be addressed. It is simply misleading for processors to import a product, add some value, and then claim it is a product of the country in which the processors operates. This is misleading to the consumer and goes against the principle of transparency. The origin of the primary ingredient of the product should be clearly identifiable on the packaging.

9. The Joint Committee agrees that in respect of marketing terms and standards, the issue of application of reserve terms, definitions and guidelines is important. With regard to definitions of optional and general reserve terms, the Joint Committee believes that it is necessary for the EU to define reserve terms describing farming methods, in particular those that are becoming more popular in current consumer trends such as low carbon food and sustainability. However, there should be a degree of flexibility to take account of regional and climatic variations. The EU should also have a role in enforcing the definitions and guidelines relating to reserve terms and marketing standards.

10. The Joint Committee recognises the benefit of certification schemes in assisting with the marketing of agricultural produce. It also notes that there has been a proliferation of privately managed certification schemes. The question of whether certification schemes actually enhance product quality depends greatly on the scheme and the product in question. If the EU decides to introduce guidelines in respect of certification schemes, they should require that these schemes demonstrate progressive developments that are beneficial to food
safety and respond to consumer interests. EU guidelines should discourage unquantifiable aspects that cause unnecessary red-tape and paperwork. The value of the certification scheme should be measurable and relate explicitly to scientific risk. Certifiers should be required to undertake analytical testing and not just rely on the auditing of documentation. Ultimately, only certification schemes that result in better product reputation and, in turn, result in better farm gate prices should be acknowledged and endorsed.

11. The Joint Committee recognises the value of geographical indicators, namely the Protected Designation of Origin (PDO) and the Protected Geographical Indicators (PGI). However, it is disappointed that Irish producers have not taken full advantage of these indicators in order to gain a market competitive advantage. It has been made clear to the Joint Committee that the main reasons for the low uptake of PDOs and PGIs by Irish producers is the lengthy bureaucratic process involved in order to become registered. Therefore, the Joint Committee calls on the Commission to examine ways to simplify the registration process for producers and to actively encourage the use of geographical indicators.

12. The Joint Committee believes that the question of whether the implementation and control of marketing standards be left to self-regulation or be governed by an EU regulatory framework needs careful consideration. Any policy or regulatory framework in the area of agriculture product quality and market standards needs to have the confidence and trust of consumers. The Joint Committee has some doubts that this required confidence can be achieved through self-regulation. However, the Joint Committee also believes that farmers and producers should not be regulated to the extent that their competitiveness on the world market is adversely affected. It is important that the right balance is struck and the optimum outcome would be a policy and regulatory framework agreed by all stakeholders.

Oireachtas Joint Committee on European Affairs
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