



European Commission
Ms Sandra Gallina, Director-General
Directorate-General for Health and Food Safety
Rue de la Loi 1200
B - 10000 Brussels

Zoetermeer, 23 December 2021

Subject: Importance of free trade and import of fresh fruits and vegetables from third countries

Dear Ms Gallina,

It's with great concern that Fresh Produce Centre Netherlands, the Dutch Food Retail Association (CBL), Fresh Trade Belgium and The German Fruit Trade Association (DFHV) have taken notice of repeating requests to the European Commission and European Parliament to impose stricter phytosanitary requirements (like a mandatory cold treatment) for import from third countries, specifically for citrus from South Africa.

We would like to emphasize the benefits of open markets and free trade in general and in particular the importance of the import of fresh fruits and vegetables from third countries. The supply chain is fully committed to provide the EU consumers with healthy, safe and sustainable produced products and to comply with necessary measures to protect the European production from the threat of any pest or disease.

The sector trusts that any SPS requirements enforced by the EU will be in line with the WTO SPS Agreement and are therefore not based on protectionism, are technically/scientifically defensible, proportionate to the risk and the least trade restrictive.

Controlling import risks is a consideration that has several socially relevant aspects and affects various UN Sustainable Development Goals. The choice of measures could for example hinder or even deteriorate the economic development of countries in Africa, stimulate the use of chemicals, frustrate the developments towards IPM and precision farming and have a negative effect on the consumption of fruits and vegetables. Disproportional phytosanitary requirements could have negative impacts, counteracting the policy and efforts of the Commission, member states and private supply chains.

- Inclusion of disproportional phytosanitary measures could lead to a huge cessation of the current fruit trade with the EU leading to gaps in the supply and much higher prices for EU consumers, contradicting all efforts to increase consumption, including the recent vote from the European Parliament in favour of a zero percent VAT rate on fruits and vegetables.
- The EU consumption of fruits and vegetables is too low; many initiatives have been developed to increase the intake of fresh produce. Key element to stimulate consumption is the year round availability of a varied package (therefor depending on import, e.g. for citrus) of high quality and affordable fruits and vegetables, as demonstrated by the COVID-19 pandemic (citrus being one of the top risers in consumption in 2020).
- Since many citrus fruits are cold sensitive, a mandatory cold treatment/maximum temperature would result in a negative effect on the quality of the citrus fruits, leading to more food waste and less consumption. Even within cold tolerant cultivars only a portion (approximately 30%) of the crop meets specifications necessary to withstand cold treatment.

- Based on years of experience third countries like South Africa have set up risk management systems to effectively control pests, focusing on many environmentally sustainable measures, avoiding reliance on broad-based chemical sprays. Key element of the systems approach is the flexibility to apply treatments that are appropriately aligned to e.g. variable pest pressure and local conditions. Mandatory EU requirements with regard to a cold treatment and/or maximum temperature settings would endanger the flexibility of the systems approach.
- The industries efforts to achieve a sustainable supply chain is completely in line with the recent commitment of the European Union to step up joint action in the World Trade Organization to work on facilitating trade including promoting sustainable supply chains, and the EU encouragement to move towards more plant-based diets to help limit the food sector's impact on climate change.
- Under the flag of the "EU-African Partnership", the European Union and African Union undertake extensive joint efforts to improve investment in sustainable food production, supporting job creation in the agri-food sector and the rural economy for African youth and ensuring sustainable management of natural resources.
- The citrus sector plays a strategic role in countries like South Africa because of its capacity to provide jobs and growth in rural areas. Implementation of disproportional phytosanitary requirements (like a mandatory cold treatment) could have a disastrous socio-economic impact, resulting in a dramatic declined revenue and associated job losses, specific with regard to the emerging farmers (small holders).

Specific with regard to South Africa, the largest citrus exporter to the European Union:

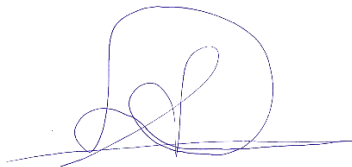
- Analysis by independent scientists shows that the South Africa citrus industry spends annually 4 billion ZAR (more than 200 million euro) on the risk management system for False Codling Moth (FCM) and Citrus black spot (CBS).
- The commitment by the entire South Africa citrus supply chain is also demonstrated by the fact that more than 99,8% of all consignments to the EU (more than 31.000) are clean, without non-compliances with regard to FCM or CBS.
- Inclusion of a mandatory cold treatment would result in effective cessation of at least 70% of South Africa's current citrus fruit trade with the EU (see the Annex for more details).
- South Africa has already decided on changes to the FCM risk management system to maximize compliance in 2022, including a significantly strengthened and more comprehensive cold temperature regime.
- The South African economy (with an official unemployment rate of 34,9% in the third quarter of 2021) is highly dependent on the citrus sector which employs 140.000 people and provides a livelihood for 1,4 million people.

We hope that you will consider our letter and the different aspects carefully. If further information is required, we are of course more than willing to discuss our concerns.

Please note that a copy of this letter had been sent to DG Trade, DG Agri and DG INTPA.

Yours Sincerely,

On behalf of FPC, FTB and DFHV,



Janine Luten
CEO Fresh Produce Centre

Dutch Food Retail Association (CBL)



Marc Jansen
Director

Annex - Effects of a mandatory cold treatment for citrus from South Africa:

- Only some cultivars can tolerate cold treatment due to chilling injury susceptibility;
- There is a range of citrus cultivars that are cold sensitive and cannot feasibly be exported using cold treatment. These cultivars are not exported to countries requiring cold treatment, but they are a major component of the current South African exports to the EU
- Even within cold tolerant cultivars, like oranges, only a portion (approximately 30%) of the crop meets specifications necessary to withstand cold treatment
- Facilities required to implement cold treatment on the volume of citrus fruit exported to the EU do not exist in South Africa
- Even that proportion of fruit that is tolerant to cold treatment will be affected, since the additional cost associated with such treatment will often render exports to be economically non-viable.

Contacts

Fresh Produce Centre is the platform representing Dutch importers, exporters, traders and producer organisations of fruit and vegetables covering around 80% of the total turnover of the Dutch trade in fresh fruits and vegetables. Our members supply all main customers in retail and foodservice in whole Europe. Contact: Janine Luten, CEO: luten@groentenfruihuis.nl; tel. +31 79 369 11 00

The **Dutch Food Retail Association (CBL)** represents supermarkets and foodservice organizations, covering around 95% of consumer expenditure of food and drinks. Contact: Marc Jansen, Director: marc.jansen@cbl.nl; tel. +31 70 337 6200

Fresh Trade Belgium is the Belgian association for importers, exporters and wholesalers of fresh fruit and vegetables. Contact: Veerle van der Sypt, secretary general; Veerle@fvphouse.be; tel: +32/476.95.46.82

Deutscher Fruchthandelsverband e.V. The German Fruit Trade Association (DFHV) is the national association for fruit and vegetable trade in Germany. The DFHV represents direct marketing producer organizations, import, export, wholesale and retail companies. Contact: Henning Kleinespel, kleinespel@dfhv.de; tel: +49 228 911450