

## MEMORANDUM

of the European  
food and drink industry  
to the Finnish Presidency  
of the EU



# CIAA

Confédération des industries agro-alimentaires de l'UE  
Confederation of the food and drink industries of the EU

CIAA, the Confederation of the Food and Drink Industries of the EU, is the voice of the European food and drink industry - the leading industrial sector and major EU employer and exporter.

CIAA's role is to represent the food and drink industries' interests, at the level of both European and international institutions.

CIAA's mission is to help pro-actively develop an environment (enlarged EU and global markets) in which all European food and drink companies, whatever their size, can compete effectively for sustainable growth, meeting the needs of consumers and playing their part in delivering the targets set by the Lisbon declaration of the European Council - that is, to become the most competitive economy in the world by 2010. CIAA thus contributes to the development of a legislative and economic framework addressing issues of competitiveness, food quality and safety, consumer information and respect for the environment.

Membership of CIAA is made up of:

- 25 national federations, including 3 observers;
- 32 EU sector associations;
- 22 major food and drink companies.

CIAA's permanent secretariat, based in Brussels, maintains close contacts with European and international institutions and has become a major partner in consultations on food-related developments. It co-ordinates the work of more than 700 experts, grouped in Committees and Expert Groups around the following three themes:

**Trade and  
Competitiveness**



**Food and  
Consumer Policy**



**Environment**



Through these Committees and Expert Groups, manufacturers from all EU countries provide broad and in-depth expertise. They contribute to establishing CIAA positions on key issues which, once approved, are communicated to European and international decision makers.

CIAA has become a trusted partner of European and international institutions as a result of its longstanding work, in particular on horizontal food issues such as food quality and safety, nutrition and health, novel foods, labelling, the Common Agricultural Policy, international trade issues, sustainable development, respect for the environment and enlargement.

**CIAA fulfills its role as a leader in the representation of EU food and drink manufacturers by:**

- **helping the food and drink industry to maintain consumer confidence;**
- **establishing close and fruitful cooperation between all links in the food chain;**
- **ensuring maximum coordination between the various sectoral and geographical groups that make up the EU food and drink industry.**

**THE EU FOOD AND DRINK INDUSTRY:**

- is the largest manufacturing sector in Europe, with an annual turnover in excess of €815 billion;
- purchases and processes 70% of EU agricultural production;
- exports some €45 billion of food and drink products to third countries;
- contributes to a positive trade balance of around €4.5 billion;
- offers 450 million consumers a wide range of safe, wholesome, enjoyable, nutritious and affordable food and drink products;
- employs more than 4 million people.

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# CIAA PRIORITIES FOR THE FINNISH PRESIDENCY OF THE EU



Brussels, June 2006

Finland, geographically located on the north-eastern corner of Europe - will move centre-stage during the second half of 2006 when it assumes not only the responsibility, but also the prestige of presiding over the European Union. With responsibility, however, comes the need for action, especially in relation to how the EU plans to move forward in the years ahead. Stating that 'the Union must emphasise activities that bring added value,' that is, measures where Union-level action clearly outperforms action taken by individual Member States, Finland has already outlined a number of priorities on which it will concentrate efforts over the next six months.

CIAA shares many of these priorities, the key ones being:

- ☞ Industry competitiveness
- ☞ Growth and employment
- ☞ Better regulation
- ☞ Improved innovation policy

In addition, CIAA also draws close attention to its own interlinked priority of readily and proactively engaging in the debate on nutrition and obesity. CIAA's commitments to drive action in this area both underline the industry's leadership along with its readiness to implement effective solutions to tackle this multi-factorial issue.

Over the next six months and beyond, these priorities will dominate the work of CIAA. We very much look forward to working closely with the Finnish EU Presidency and in making progress in all of these areas. As always, CIAA is committed to playing an active, constructive, and leading role in the general debate on food so it contributes to the success of the Finnish Presidency



Jean MARTIN  
*President of CIAA*

## **Competitiveness of the food and drink industry**

# Improving industry's competitive environment

The EU food and drink sector is an important pillar of the European economy. For Europe to remain an attractive location for continued industry investments, some worrying facts, such as the slowing down of productivity growth and low value added growth, need to be tackled through appropriate and coordinated action in a number of areas.

The CIAA Benchmarking report published in Spring 2006 examines how well the food and drink industry performs in an international comparison and identifies a number of weaknesses. The report focuses on areas that are specific to the food and drink industry activity or that are of particular relevance for its development. It identifies room for improvement in the field of research, development and innovation, of administrative burden, of agricultural inputs and of trade policies and recommends action that would contribute to making the regulatory environment more conducive to the development of the food and drink industry.

CIAA supports initiatives in the area of better regulation, since it considers that the EU regulatory framework needs to be simpler, more proportionate and more competitive. CIAA has proposed specific improvements in a number of different regulatory areas, with a view to reducing administrative burdens, costs and the negative effects of too prescriptive or inadequate legal texts. For example, the

cost of the pre-market approval of novel foods needs to be reduced and time scales shortened. The legal provisions on additives should be eased to adjust to technical progress while the far too numerous provisions on food labelling need to be modernised, simplified and consolidated.

Obstacles to increased participation in research and development activities and to better performances in innovation must be addressed and tackled through concerted action from both the food and drink industry and public authorities, in order to find appropriate responses.

Any new legislative initiative needs to be preceded by a thorough impact assessment, weighing up the costs against the benefits. Early industry involvement in the consultation process will be critical to ensure constructive industry input throughout the process and to envisage appropriate scenarios.

CIAA aims at ensuring a comprehensive and consistent approach that supports the competitiveness of the food and drink industry, including its numerous small and medium-sized enterprises (SMEs). Further to the development of appropriate instruments for the longer term in terms of monitoring of food and drink industry performance, EU institutions can contribute through:

- implementation of the better regulation approach, including impact assessments;
- specific action to support enhanced investment in R&D and dissemination of research results;
- designing trade and agricultural policies which are supportive of industry development on world markets.



# Trade and competitiveness

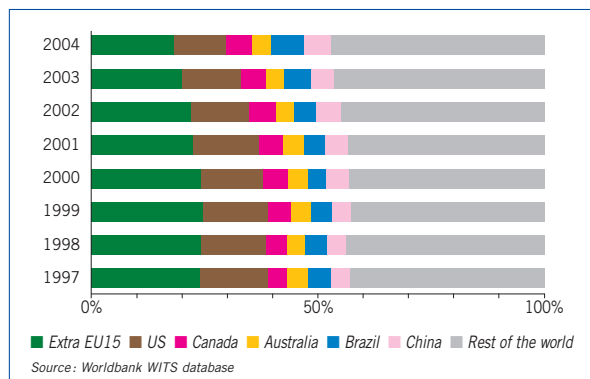
It is of critical importance for the competitiveness of the EU food and drink industry to achieve sustained growth and market share in both European and third country markets. EU food and drink companies face strong international competition from countries with comparative advantages in basic food production.

The ability to compete on foreign food and drink markets depends on a number of factors, such as costs, including costs for transport and inputs, management factors and logistics. Therefore, given this situation, it is essential to guarantee the sustainable and competitive supply of EU agricultural products, establish balanced rules and develop sustained trade through multilateral agreements and closer links with trade partners and neighbouring countries. Exports of EU food and drink products, in particular quality products, offer real growth potential and represent an asset that needs to be promoted within the context of stiff competition on world markets.

The EU industry's competitiveness needs to be supported by both a bilateral and a multilateral strategy, with a view to providing targeted market access in third countries. EU companies are ready to take on the challenge of increased competition in an open global market, but the EU needs to assess internal and trade policies with regard to their direct or indirect influence on the EU's ability to invest, trade and maintain its competitive edge.

Increased trade problems linked to sanitary and phytosanitary (SPS) and technical barriers to trade (TBT) issues call for particular attention, and stronger coordinated action should be taken by the EU Commission. The EU Commission may also have to draw up and implement agreements in the SPS area, and explore the possibility of addressing food regulatory issues through regulatory cooperation.

Share of world food and drink exports



The European market share of the global export market in food and drink products has been shrinking over the last ten years (24% to 18%).

## Trade policy issues

# WTO negotiations

CIAA is committed to the multilateral process and welcomes the efforts that have been made since the WTO Hong Kong Ministerial Conference to move the rules-based trading system forward. However, the end of April deadline for formulating modalities in agriculture and non-agricultural market access has been missed. Much work remains to be done to achieve, by the end of July 2006 at the latest, a balanced outcome that promotes improved market access and defines clearer and fairer agricultural trade rules.

The 6<sup>th</sup> WTO Ministerial Conference in Hong Kong from 13-18 December 2005 represented a critical phase in making comprehensive and ambitious progress allowing for the conclusion of the Doha Round in the course of 2006. But much work remains to be done to achieve a balanced outcome of the Doha Development Round. For the EU food and drink industry, key areas of interest include agriculture, trade facilitation, enhanced protection of geographical indications within the TRIPS agreement and non-agricultural market access (NAMA).

Maintaining the competitiveness of the EU food and drink industries is a fundamental objective which depends on a balanced approach consistent between market access, domestic support and export competition. It is equally important to pursue a coherent approach as regards agricultural products and processed goods - they must be treated on an equal footing and according to a parallel timetable. The Doha Round Agenda should achieve this balanced outcome by setting fairer trade rules and strengthened disciplines in agriculture.



CIAA supports a substantial reduction in all forms of trade-distorting domestic support - amber box, blue box and de minimis, but considers that, since green box measures are not trade-distorting, the review should not be misused to try to redefine the criteria. On market access, the tariff reduction formula finally chosen must create real improvements in market access opportunities for food and drink products. No tariff lines should be exempted from reduction commitments, but there needs to be a certain degree of flexibility. The agreed date for the phasing out of all forms of export refunds must still be confirmed upon completion of modalities as it is conditional upon strictly parallel treatment of other export support measures, i.e. export credits, food aid, and the functioning of State Trading Enterprises (STEs). The timing and the way in which export refunds are phased out will be critical for maintaining the competitiveness of the EU's food and drink manufacturing industry. CIAA understands that there is a commitment to eliminate "a substantial part" of all forms of export subsidies by the first half of the implementation period, which still needs to be determined without a "front-loading"

of commitment. Since export refunds compensate for higher EU agricultural prices, their elimination will result in exports no longer being viable in certain sectors of the food industry unless access is granted to competitive agricultural raw materials.

The development dimension of the Doha Round cannot just focus on developed countries providing special and differential treatment to all developing countries. CIAA recognizes the need for specific arrangements, but has serious concerns about the high level of flexibility offered to developing countries independently of the strength of their agricultural sector, as provided for in the Hong Kong Ministerial Declaration.

CIAA strongly supports progress made and future negotiations on trade facilitation, which have the potential to considerably improve trade and reduce costs (clarify reasonable fees and charges; increase transparency; promote trusted trader schemes, centralised trading systems, etc.)

The WTO Hong Kong Ministerial Conference achieved only limited progress, mainly on export competition, and has raised serious concern as to the overall balance and coherence of any future agreement. The last few months of negotiation have allowed for some further progress, but much work remains to be done. The agreement will have to be fine tuned at a later stage, including modalities for agriculture, but also modalities concerning non-agricultural market access and trade facilitation.

CIAA believes that strong guiding principles are needed to ensure that a coordinated approach is taken throughout the three pillars of market access, domestic support, and export competition. A coherent approach is also required when it comes to agricultural products and processed goods since they have to be treated on an equal footing to ensure continued competitiveness of EU food and drink industry products.

## EU - EUROMED negotiations

The 10<sup>th</sup> anniversary of the Barcelona process on 27-28 November 2005 was an opportunity for the Euro-Mediterranean Ministers to launch a 5-year programme to reinforce this policy by approving road maps for the creation of a Free Trade Area by 2010. Bilateral negotiations on additional trade liberalisation for food and drink products have already begun with countries such as Morocco and Israel.

The mandate, approved in November 2005, is likely to provide for a high degree of liberalisation with a very limited number of exceptions and a timetable for implementation. The European Neighbourhood Policy (ENP) is closely linked to this new stage in the EUROMED relations. The success of the Euromed project will depend much on significant progress being made in South-South relations.

CIAA wishes to reaffirm its support for the Barcelona process and is pleased with this new impetus. The Mediterranean countries are the EU's privileged partners and this new strategic phase is a necessary and significant step.

- CIAA is in favour of reciprocal liberalisation of trade within the food and drink sector, taking into account the outcome of the WTO Doha Development Agenda.
- CIAA has already identified offensive market access interests for specific tariff lines. Regarding tariff concessions to Mediterranean countries, a number of food and drink sectors have concerns about specific products that they will express more specifically.
- the particular interest in these negotiations lies also in the non-tariff barriers and the convergence of the regulatory framework.

# Economic Partnership Agreements (EPA)

In 2000 the European Commission and African, Caribbean and Pacific (ACP) countries decided to start Economic Partnership Agreements (EPA) with the aim of advancing development and growth. EU Member States mandated the European Commission in June 2002 to negotiate with the ambition of allowing EPAs to enter into force by 2008. During the interim period the non-reciprocal Lomé IV trade preferences continue to apply and trade related assistance has been made available.

The heterogeneous nature of ACP countries gave rise to the idea to hold regional talks with six country groups comprising all 77 ACP countries. Regional negotiations started in 2003 and in the coming months the six regions of "West Africa," "Central Africa," "Eastern and Southern Africa," the "Caribbean," the "Southern African Development Community" and "Pacific" joined the EPA negotiations. Priorities were defined, regional negotiation structures were put in place and today bilateral meetings are held regularly, with significant progress being made in some groupings and less in others. A sustainable impact assessment was released in 2005, which highlighted the potential benefits and evaluated the economic, social and environmental impact of such EPA agreements.

CIAA welcomes this initiative and the specific focus of facilitating trade within the six groups of countries in order to enhance regional integration. The gradual managed

transition for trade liberalisation should allow ACP countries to participate in the global trading system and should also foster economic development. The partnership agreements impose obligations on both sides: the EU will open its markets to ACP products and the ACP states will have to implement policies that foster regional integration and strengthen supply side capacities.

CIAA strongly supports the progress made so far and reaffirms its support for the strengthening of economic relations with ACP countries. EPAs will significantly increase regional integration, improve development prospects and the integration of ACP countries into the world economy. Capacity building is and will be a very important tool to overcome severe difficulties, notably the underdeveloped economic and social infrastructure which in many ACP countries effectively hinders trade and investment.

- For CIAA, trade facilitation and other measures that limit and reduce existing non-tariff barriers are important to foster trade and development.
- CIAA recalls that capacity building measures are an important and necessary tool when liberalising trade and enhancing regional integration.
- The European food and drink industry looks forward to contributing to the negotiation process and in pursuing dialogue with both the EU and ACP officials involved.



## Modernised Customs Code

Two proposals, adopted by the Commission in November 2005, are aimed at modernising customs. The purpose of the first proposal is to simplify customs procedures, thereby facilitating trade whilst ensuring more efficient customs controls. In addition, a draft decision should create the conditions for a paper-free electronic work environment, with simplified mutual exchanges of information.

CIAA strongly welcomes provisions aimed at radically simplifying and modernising the customs legislation. The trade facilitation aspect is essential in the context of the Lisbon strategy, aimed at increasing the competitiveness of EU companies. Moreover, the industry supports all initiatives enabling the creation of a genuine single market for customs in the EU. Dealing with different interpretations of the Customs Code in the 25 Member States creates additional costs and barriers to trade.

For CIAA, the modernised customs code should lead to a thorough simplification and management of the inward

processing regime (IPR) both at national and Community level. Indeed, the economic importance of IPR will increase in the years to come, particularly as a result of the progressive elimination of export refunds. The rules on equivalence, diverse provisions regarding authorisation procedures and the deadlines allocated to the various stages of these procedures make IPR particularly difficult to use for several sectors of the food and drink industry.

- CIAA welcomes this process aimed at modernising and simplifying customs legislation.
- Rationalising customs procedures, making electronic communication standard and developing a common approach to risk analysis are fully supported by the industry, as it should reduce costs linked to customs procedures.
- Real trade facilitation should be foreseen for authorised exporters.
- This fundamental revision of the Customs Code must allow food and drink operators to obtain substantial improvements regarding the inward processing regime.



## Rules of origin

In March 2005, the Commission presented a Communication outlining a possible new approach for the determination of rules of origin in preferential agreements with third countries.

The declared objective of the Commission is to simplify the rules of origin principle by relaxing these rules in order to encourage greater integration of developing countries in world trade. Beyond a first implementation in the context of the Generalised System of Preference, the Commission's intention is to apply the new approach to all existing and future preferential trade arrangements (ACP countries, Euromed,...).

Two major points have raised concerns in the food and drink industry during the debate that was triggered with the Commission's Communication: on the one hand, the

Commission has proposed replacing current methods of determining origin with a single rule based on value added and, on the other, transferring responsibility for determining the origin to operators.

For CIAA, no gain has to be expected in terms of simplification and of development. On the contrary, it would worsen the current situation. Indeed, even if the current system is complex, the proposed reform would add further complexities and administrative burdens, is not development-friendly and would increase potential for fraud in the food and drink sector.

- Overall, CIAA considers that the proposed reform should not apply in the food and drink sector as it does not provide for simplification and misses the Commission's objectives.
- One single criteria - the value added method - for all products, including the food and drink sector, is not feasible.
- The increased responsibility of the importer is a major concern for EU operators as, due to confidentiality reasons, most of the EU importers will not be in a position to make the necessary checks with their supplier.

## Agricultural Policy Issues

### EU agricultural policy

The long-term objective of the EU food and drink industry is to promote a competitive, efficient and more sustainable agricultural production in Europe. The CAP reform decision of June 2003 represented a decisive step forward towards the opening up of the European agricultural sector to market forces through the decoupling provisions retained by EU Agriculture Ministers.

CIAA welcomed the fact that the payment of decoupled aid became linked to the respect of EU regulatory requirements and of good agricultural conditions. Agricultural policy establishes standard requirements and it offers a framework within which private or public initiatives may be developed that go beyond mere regulations and address issues such as farming practices, socio-economic criteria, respect for the environment and animal welfare. The Sustainable Agriculture Initiative (SAI) Platform is one such initiative set up by companies in the food and drink sector that have joined forces with the aim of developing and promoting the use of good agricultural practices throughout the world.

In the framework of the simplification of the agricultural policy, the Commission presented a proposal on organic food and farming aimed at enhancing the development of this specific system of agriculture in the next 10 to 15 years. CIAA supports this exercise which should contribute to the development of a market-based sector and harmonise the existing interpretations. Moreover, regarding ingredients of non-agricultural materials, it is important that current practices of EU processors based on the principles laid down in current regulations continue.



- For the food and drink industry, the CAP should achieve two major objectives: guarantee supply and improve competitiveness.
- The welcome introduction of decoupled support and cross-compliance has been the main feature of the latest reform steps that will now be considered for other areas.
- CIAA supports initiatives, such as the SAI Platform, which provide a framework and support for the development of sustainable farming practices.
- The proposal on organic production has to lead to the development of an economically viable and market-driven sector. The review of the Annexes' content of the current Council Regulation, which are of utmost importance for the food businesses concerned, must enable food processors to pursue current practices.

# Quality and safety of food and drink products

Quality is a broad concept and has different meanings throughout the food chain. While the number of quality assurance schemes is growing, in response to a request from the EP, DG Agriculture has launched a pilot project aimed at identifying current quality management systems and assessing the costs and benefits for actors in the food chain. Further to a stakeholder consultation process undertaken in 2005, the Commission now wishes to complete and validate the findings obtained so far, in particular regarding possible EU policy options on quality.

CIAA considers that it is essential to separate the concept of food safety from that of quality. Food safety, throughout the entire food chain, is a fundamental and non-competitive principle and it is based on strict Community legislation. Once products comply with food safety standards, consumers will decide which foodstuffs they want, depending on their income, lifestyle, tradition, etc. Food quality is up to the market and must not be subject to

mandatory, regulatory prescriptions. It is a private sector responsibility. The consumer expresses confidence and appreciation by repeated purchase of the product. Industries will communicate to the consumer about organoleptic characteristics, appearance, the origin of the agricultural material processed and convenience of use of the final product.

- Food safety management is a non-competitive prerequisite while quality management can provide a competitive advantage.
- The food and drink industry has developed voluntary quality assurance schemes and is responsible for these systems vis-à-vis the consumers. There is an enormous diversity of schemes, with a variety of aspects and actors involved.
- In the discussions on the increasing number of quality assurance schemes, it must be recalled that it is ultimately up to the consumer to judge the “quality” of a product. The Commission should not prepare additional legislation in this area.



# EU biofuels strategy

In the context of a fundamental review of European energy policy, the Commission presented a Biomass action plan, including an EU Strategy for transport biofuels, aimed at promoting renewable energy sources.

The food and drink industry's interest in the renewable energy debate can be explained from three different perspectives.

- a) The food and drink industry is competing for some of the same raw materials that enter non-food industries and is hence concerned about feedstock availabilities and as a consequence price developments for the food and feed sector.
- b) As a producer of by-products from crop-based and animal-based production processes, the food and drink industry has an interest in the development of technologies that would give these by-products better and more valuable outlets.

- c) As an energy consumer, the food and drink industry has an interest in access to competitive and sustainable energy supplies.

Monitoring the impact of the biofuels strategy on markets and availability of basic products for food production is essential. CIAA members are already facing price increases for rapeseed oil. This trend, which is expected to continue, can be explained by different factors, notably the development of the biodiesel industry and the total shift of food demand from soy oil into rapeseed oil because of the GMO issue.

- The monitoring proposed by the Commission of the impact of the biofuels strategy on markets and on availability of agricultural raw materials is clearly essential for the food industry as it may allow a problematic situation to be identified. Beyond this monitoring, the Commission must be willing to act in case of serious imbalance regarding the feedstock supply.
- CIAA considers that a diversification of sources for the production of biofuels will avoid exacerbating pressure on a single raw material supply and will prevent disruption in food markets. Biodiesel and bioethanol production should be developed in a balanced way.
- Given their potentially high benefits, second generation biofuels should be stimulated by research and development, as they are not yet economically and technically feasible.
- The impact of fuel tax exemptions and mandatory incorporation of biofuels on the availability of raw materials will have to be fully assessed.



## Research

While the EU's 7<sup>th</sup> Research Framework Programme (FP7) recognises the potential of research and development to promote economic growth by increasing the overall budget of the Framework programme, the portion supporting biotechnology, agriculture and food (which includes forestry) remains at the same low level as in the 6th FP compared to other sectors.

Moreover, CIAA very much regrets the decision by the EU institutions to reduce the overall budget for the EU's 7th Research Framework Programme (FP7) compared to the initial proposal. While CIAA appreciated the efforts by the European Commission to increase the proposed budget, it notes with regret that the budget cuts will severely restrict the research and development necessary for the placement of European manufacturing of bio-resources and food production on a sustainable footing.

CIAA firmly believes in the importance of developing a coherent research strategy for the agri-food sector, based upon the shared vision of its diverse stakeholders, namely, the food and drink industry (including SMEs), farmers' representatives, agrochemical and breeding companies, retailers, researchers, processors, consumer organisations, regulatory bodies, policymakers and governments.

CIAA is confident that an effective integration of strategically-focused, trans-national, concerted research in the field of nutritional sciences, food quality and food technologies will deliver innovative, novel and improved food products (such as traditional food products) for, and to, national, regional and global markets which are in line with consumer needs and expectations. These products, together with recommended changes in dietary regimes and lifestyles, will have a positive impact on public health and our overall quality of life. Targeted activities of this kind will help to support a successful and competitive pan-European agro-food sector and ensure EU global business leadership based on economic growth, technology transfer, ecological sustainability and consumer confidence.

Under the leadership of CIAA, the European Technology Platform (ETP) Food For Life, reflecting innovation in the agro-food chain, was launched in July 2005. At the same time, a paper reflecting the Vision for 2020 and beyond was published. In April 2006, expert panels of academics and representatives of industry and consumer bodies submitted a Stakeholder Strategic Research Agenda (SSRA) to the European Commission, (<http://etp.ciaa.be>). The outline SSRA identifies seven trans-disciplinary challenges deemed necessary to stimulate or underpin innovation, including: ensuring that the healthy choice is the easy choice for consumers; delivering a healthy diet; developing value-added food products with superior quality, convenience, availability and affordability, and assuring safe foods that consumers can trust. CIAA will now promote and disseminate the SSRA, subject it to extensive national- regional- and website consultations, and undertake preliminary activities for scenario studies. Facilitated workshops in northern, southern and eastern EU regions will be held to ensure that the activities of the ETP reflect the interests and opportunities of all stakeholders in Europe (including SMEs and Associated Candidate Countries). Links will be established with regional/national bodies having information relevant to the ETP's operation, and an open and accessible database will be developed for this data. Meanwhile, Mirror Groups will be created to ensure expert input from regional and national bodies, funding agencies and organisations. Consultation on the SSRA will last until early next year, after which a definitive Strategic Research Agenda and Implementation Plan will be published in March 2007 detailing the research, training and communication activities crucial for enhanced innovation, together with a strategy for their management and funding.

In order to reach the goal of transforming Europe into a competitive knowledge based bio-economy (KBBE), CIAA calls on the Finnish Presidency to support the allocation of a larger share of resources to this sector, and to FP7 in particular.



## Novel Foods

While CIAA welcomes the decision to propose an amended Regulation on novel foods and novel foods ingredients, it underlines the importance of completing an adequate assessment of the potential impact of this proposal.

CIAA is urgently awaiting the proposal for a Regulation on novel foods and novel food ingredients, which would amend Regulation (EC) No 97/258/EC. The proposed text, expected to be adopted in the second half of this year after

public consultation, will aim to clarify the definition and categories of novel foods and, consequently, the scope of the Regulation.

CIAA considers, however, that it is vital that an adequate impact assessment is completed prior to the publication of the draft proposal, and therefore welcomes the Commission's decision to undertake such an assessment. A recent survey of CIAA member companies has shown that the current EU novel foods legislation poses significant obstacles to the development of new products, as companies frequently experience serious administrative problems when trying to obtain the approval of novel food products. The burden and length of current administrative procedures can be a disincentive for EU food and drink companies wishing to invest in R&D and innovative products.

CIAA believes that the Commission's better regulation approach should apply to the forthcoming legislation. The administrative procedures for novel foods need to be more business-friendly and supportive of innovation. In particular, novel food approval procedures should be amended. They should consist of an initial scientific assessment that is risk based and hence limited to safety, and with clear deadlines for each step of the procedure, transparency of process and communication with applicants. When the end product is substantially equivalent to an appropriate reference product, a simplified fast track procedure should be introduced. Finally, the "history of safe use" principle, as practiced in the United States, should be considered in Europe.

## Package of Proposals on Food Improvement Agents

(Regulations on Food Additives, Enzymes, Flavourings & Food Ingredients with Flavouring Properties, Common Authorisation procedures)\*

CIAA welcomes the proposed revision of the Additives Framework Directive, which rationalises the mechanism for the authorisation and review of additives and their uses, and consolidates the frequently revised specific additives Directives. CIAA supports the harmonisation of safety assessment provisions for food enzymes used in the Community. CIAA welcomes the Commission's timely revision of the Framework Directive on Flavourings. CIAA strongly supports the introduction of the Comitology procedure for all technical provisions and a centralised risk assessment process, to be undertaken by the European Food Safety Authority (EFSA).

CIAA strongly supports the introduction of the Comitology procedure for the implementation and amendment of technical details, and a centralised risk assessment procedure conducted by EFSA for the authorisation and review of provisions for additives, enzymes, flavourings and food ingredients with flavouring properties (BAPs).

### Proposals for Regulations on Additives and Enzymes

As far as the draft proposals on additives and enzymes are concerned, CIAA welcomes the fact that the comments

submitted during 2005 by the Food & Drink Industry on the initial draft proposals have been taken into account in the development of the final proposals.

In particular:

- CIAA welcomes the fact that the definition of processing aids is kept unchanged from Directive 89/107/EEC, given

(\* ) Comments refer to draft proposals and are subject to formal publication of the package of proposals



the numerous interpretation and application problems that the newly proposed definition would have encountered. The definition as in Directive 89/107/EEC is also in line with the Codex definition for processing aids.

- CIAA welcomes the fact that in the final proposals, food additives and enzymes will be subject to an on-going review according to actual use and possible new uses, and not following an arbitrary 10-year authorisation renewal clause.

CIAA welcomes the rationalisation of the enzymes proposal to exclude enzymes used in the production of food additives, flavourings and novel foods, since their use is already addressed under the evaluation procedure which applies to each of these three categories. CIAA supports the approach adopted as regards the establishment of a Community list of food enzymes (positive list), which will focus on enzyme products and their origin, but not on the brand.

During the upcoming co-decision procedure in the EP and Council, CIAA will support the Commission proposals and the application of the comitology procedure for all technical provisions.

In parallel to the co-decision procedure for adoption of the proposals, CIAA is looking forward to the development by EFSA of the corresponding guidelines for the authorisation procedures for enzymes and additives, which should progress in parallel to the revision of the additives framework legislation, in order to prevent legislative voids, uncertainty and delays.

CIAA considers it essential to retain the right to be granted temporary or national authorisations while the additives legislation remains under review. New regulations in the area of additives and enzymes should allow for temporary national authorisations to be granted until the proposals are adopted. Otherwise, a lengthy 'stand-by situation' will arise, thereby hindering both product development and continuous market adaptation.

On **flavourings**, CIAA welcomes both the clarifications made to the scope of the proposed flavourings Regulation and the changes that have been made to the control of active principles.

In particular, as regards the scope, CIAA welcomes the definitions concerning food ingredients with flavouring properties, and the exemption of:

- substances which have exclusively a sweet, a sour or salty taste and
- raw or non-compound foods, such as spices, herbs or tea as such.

CIAA does, however, have some concerns regarding the removal of the distinction between "nature identical" (NI)

and "Artificial." These categories have been in use for some time and are enshrined in some national legislation. The decision to treat them in the same way will have considerable impact on the food industry, particularly where national legislation will have to be changed.

CIAA believes that any attempt to change the labelling terms for the benefit of the consumer should focus on providing the consumer with more meaningful information, rather than simply more information.

CIAA welcomes the fact that in the final proposal, authorisation of flavouring substances will be subject to an on-going review according to actual use and possible new uses, and not following an arbitrary 10-year authorisation renewal clause.

During the upcoming co-decision procedure in the EP and Council, CIAA will support the Commission proposal and the application of the comitology procedure for all technical provisions.

CIAA supports the general intention to revise several aspects of the Framework Directive 88/388/EEC but considers that the revision should not be overly ambitious and try to deal with too many issues at once. In particular, perceived safety concerns linked to the consumption of biologically active principles should not be addressed since this risk has not been fully assessed yet.



# Draft Proposal for a Regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

The European Food and Feed Industry supports the overall objectives of the REACH proposal to protect human health and the environment, improve EU competitiveness and reduce animal testing; and advocates for the explicit exclusion of food and feed, already covered by Regulation 178/2002/EC, from the scope of REACH.

In the original Commission REACH proposal, the position of food and feed remains unclear. A number of product categories, including some food ingredients, have been excluded from the scope of the REACH proposal since they are covered by other EU legislation (in order to avoid double legislation). The fact that some food materials are in, and some are out of the scope, causes confusion and inconsistency at many levels.

The safety of food and feed is legislated under Regulation (EC) 178/2002. The EFSA has been established to take care of all health related aspects of food and feed, their ingredients and production.

Existing EU food and feed legislation already ensures the "general objectives of a high level of protection of human life and health and the protection of consumers' interests, including fair practices in food trade, taking account of, where appropriate, the protection of animal health and welfare, plant health, and the environment." (Art. 5 (1) of Regulation (EC) 178/2002).

CIAA welcomes the outcome of the European Parliament's first reading and the Council's first reading political agreement, where a general exemption from the main provisions in Reach has been introduced for food and feed as regulated under 178/2002/EC.

CIAA supports the Council's first reading political agreement provisions amending the Commission's proposal for a revised Chemicals policy (REACH) to explicitly exclude all food, feed and their ingredients from the main provisions under the scope of REACH.

The exemption of food and feed from this frame is of great importance in order to:

- achieve consistency within EU legislation and avoid duplication of legislation;
- avoid confusion between the responsibilities of EFSA and the new EU Chemicals Agency;
- avoid unworkable and unenforceable provisions;
- avoid disproportionate measures to address human health;
- avoid environmental safety issues that are already covered under other EU legislation.



## Regulation on nutrition and health claims made on foods

CIAA supports the general objective of the Commission proposal adopted on 16 July 2003 to establish a harmonised regulatory framework encompassing all types of claims, including disease risk reduction claims.

All claims that are scientifically substantiated and well understood by consumers should be permitted. The communication of the claim as such (wording of the claim) should remain the responsibility of the food operator. CIAA believes that the criteria for the substantiation of a claim should be the same for all types of claims in terms of evidence; however, the process of evaluation may differ. The principle of proportionality should apply to both the level of substantiation that is required to make a claim and

to the marketing procedures applicable to products bearing claims. The procedures should be pragmatic and entail clear, reasonable and mandatory time limits.

Against this background and the recollection that CIAA collectively still shares the view that Article 4 is NOT the best approach to achieving effective, clear and non-discriminatory consumer information, we take note of the compromise reached by the Austrian Presidency and the

European Parliament and trust that this is the best that could be achieved politically at this point in time.

Based on this assessment, we draw the attention of the Finnish Presidency to the work that lies ahead for both institutions and stakeholders in relation to the implementation of the new rules. The focus should be on two key areas:

- Article 4 and the development of the nutrient profiling scheme by EFSA: Industry believes that the following principles need to be considered when discussing the setting of nutrient profiles in the context of the forthcoming Regulation on claims:
  - Nutrient profiles should be based on scientific knowledge about diet, nutrition and the relation to health.
  - Nutrient profiles should be based on food categories.
  - Nutrient profiles should be non-discriminatory<sup>1</sup>, simple and applicable by all food operators.
  - Nutrient profiles should be set at Community level and not at regional or national level.
  - The quantities of certain nutrients and other substances contained in the food.
  - The contribution and importance of the food (or categories of foods) to the diet, with due account being taken of the dietary habits and consumption patterns in the various Member States.
  - The overall nutritional composition of the food or food categories and the presence of nutrients scientifically proven to have a beneficial effect on health.
  - Conditions for applying nutrient profiles should be set so as to enable useful consumer information and choice and should not inhibit innovation.
  - Nutrient profiles should be applicable to ready-to-eat foods.

In addition, industry sees 5 main strands in the process of establishing nutrient profiles:

- Identification of food categories for use in applying nutrient profiles and the average consumption level for each category.
- Identification of the nutrients that are of importance from a public health perspective and their relevance for the various food categories.
- Establishment of reference values / ranges for those nutrients identified in step 'b.'
- Establishment of criteria for the application of the reference values: scoring system or threshold.
- Recommendations for conditions to be applied when not meeting a profile.
- Article 13 relating to the list of claim/relationships based on generally accepted scientific substantiation: Since all EU Member States will be called to provide input to EFSA to establish this EU list, it is essential that a common methodology is agreed between the contributors aiming at:
  - The establishment of a list of relationships rather than a list of claims based on generally accepted scientific substantiation taking into account the totality of the evidence;
  - Such a list should relate to the beneficial effect of nutrients, food components or foods on health;
  - The list should also include generic disease risk reduction claims if they are of a non-commercial nature.

*(1) All food categories should be considered, no food category should be excluded.*



## Regulation on addition of vitamins, minerals and certain other substances to foods

**At a time when changing lifestyles and modifications of dietary habits are increasing the risk of micronutrient deficiencies, food fortification is one of the best tools to contribute to the dietary balance of the population.**

CIAA welcomes the Commission proposal adopted on 10 November 2003 as a positive step towards the creation of a real single market for fortified foods. The new regulation should ensure a high level of consumer protection while at the same time offering to all European consumers a varied choice of foods adapted to modern life constraints and contributing to nutritional balance.

Within the context of the diversity of food habits in Europe and of a varied and balanced diet, all foods contribute to a healthy diet. It is therefore key that all foodstuffs may be fortified with vitamins and minerals on the condition that consumer safety is guaranteed.

CIAA supports the Council's decision to base the harmonised regulatory framework for fortified foods on safety grounds, as was proposed by the European Commission and subsequently confirmed by the European Parliament.

Consumer safety must be the only criteria for the setting of maximum levels for the addition of vitamins and minerals to foods. CIAA is preparing input on this issue and would welcome the opportunity to engage with decision makers and to provide its knowledge and expertise in this area.

# Diet, physical activity and health

There is a broad consensus that the causes of obesity and its related diseases are multifactorial (diet, sedentary lifestyles, genetics, socio-economic factors, etc). CIAA believes that the responsibility of addressing this issue requires multiple strategies, the integrated efforts of many stakeholders (governments, research, health professionals, retailers, consumers, media, the food industry, etc), and indeed, long-term resolve. Any intervention must be evidence-based and will require the involvement of several sectors due to the multifactorial nature of the problem.

Food and drink industries have a long history of collaboration with public authorities in the promotion of healthy eating and healthy lifestyles, not only through their trade associations, but also as individual companies. There are already many examples of initiatives by food companies and national and sectoral food and drink industry federations to promote good nutrition, physical activity and health.

## EU Platform for action on Diet, Physical Activity and Health

CIAA welcomes and supports the Commission's initiative to establish a European Platform for action on Diet, Physical Activity and Health. This important new forum allows stakeholders to share best practice, and to develop action plans aimed at tackling increasing health problems such as obesity.

The European Platform has been a successful forum in bringing together diverse stakeholders to share best practice and strengthen commitments for the promotion of healthy lifestyles and physical activity. The CIAA commitments for action addressed to the EU Platform at the end of 2005 identified the following areas where the food and drink industry, working in partnership with the rest of the food chain, the advertising industry and other partners, will concentrate their efforts:

1. Partnership
2. Public education in relation to healthy lifestyles
3. Consumer Information
4. Advertising and marketing to children
5. Products and choice
6. Research

The commitments that CIAA is taking accelerate, deepen and widen the ongoing efforts of the food and drink industry.

Diet and nutrition make an important contribution to public health and CIAA is committed to playing its part, along with all stakeholders in improving the health status of European citizens. The food and drink industry has for many years made nutrition and health a top priority and it has indeed become a key driving force for industry research and development.

## Commission Green Paper. "Promoting healthy diets and physical activity: towards a European Strategy for the prevention of overweight, obesity and chronic diseases"

CIAA supports the Commission's initiative to launch a public consultation for the development of a European strategy for the prevention of overweight, obesity and chronic diseases, and welcomes the transparent and participative approach taken by the European Commission on the consultation process. Improving the health of Europeans through better diets and greater physical activity is crucial to preventing a range of non-communicable diseases and improving the quality of life for millions of people.

To be successful in improving public health, CIAA emphasises that any public policy intervention must be evidence-based. Most of the areas for action raised in the Green paper are consistent with what our members are already doing. The voluntary commitments undertaken by CIAA accelerate, deepen and widen the ongoing efforts of the food and drink industry to promote healthy diets and physical activity. CIAA considers it essential to establish a firm scientific basis for any recommended policy.

CIAA would like to highlight that effective self-regulation and voluntary cooperation with stakeholders is the most effective way to bring together resources and forces to be successful in the promotion of healthy diets and physical activity.

CIAA strongly believes that improved public health education on nutrition and healthy lifestyles is urgently needed in order to solve current health problems. This would enable consumers to take responsibility for making healthy choices. It would also be the basis for understanding and making use of product information provided by industry. Education should also include information on the role of physical activity in the context of a healthy lifestyle. CIAA emphasises the fact that every food can play a role in a balanced diet.



## EU Greenhouse Gas Emission Trading Scheme

On 1 January 2005, the EU Greenhouse Gas Emission Trading Scheme (ETS) came into effect. This scheme is mandatory for food and drink companies with combustion installations with a rated thermal input exceeding 20 MW. The importance of the scheme for the food & drink sector is reflected in the fact that, for instance, in France 13.6% of all ETS installations are food and drink sites.

On the basis of Article 30 of the ETS Directive, the Commission is carrying out a review of the current ETS and is thereby considering amendments, inter alia, to the scope of the Directive and the need for further harmonisation of allocation methodologies.

- In their national allocation plans (NAPs) for the first ETS phase, Member States applied different definitions to the term 'combustion installation' in Annex 1 of the ETS Directive. These inconsistencies in the scope of the ETS lead to competitive distortions amongst companies and sectors from different Member States.
- For small installations, the permitting, reporting and verification requirements of the current ETS constitute a heavy administrative burden, which is often disproportionate to the low level of their actual emissions. CIAA favours the introduction of a de minimis rule for the lowest emitters (for example, below 25 kt CO<sub>2</sub>/year). In this context, CIAA also supports a simplification of the Monitoring and Reporting Guidelines (MRG), in particular for small installations.
- For future trading periods, CIAA does not support a unilateral or EU-wide extension of the ETS to additional activities, installations or gases in the food and drink sector.
- CIAA calls for the sharing of carbon reduction burdens across all economic sectors, both inside and outside the ETS, and emphasises the importance of establishing a truly global climate change regime for the post-2012 period.

## Integrated Pollution Prevention and Control



Directive 96/61/EC on Integrated Pollution Prevention and Control (IPPC) is paving the way towards more sustainable production patterns.

Correct implementation of this Directive is therefore a key priority for CIAA. To date, European food and drink industries have made significant investment in clean technologies and Best Available Techniques (BATs), in order to conserve natural resources and minimise waste generation.

CIAA has also co-operated with the Commission and the IPPC Bureau to draw up a reference list of BATs (BREF document) for the food, drink and milk sectors, which lays down adequate guidelines for granting environmental permits for industrial installations.

- To promote effective implementation of the IPPC Directive, several ambiguities have to be clarified. A number of legal issues need to be interpreted and applied in a uniform manner across the EU.
- CIAA supports a revision of the IPPC Directive, in particular a technical review of its Annex 1 in order to better define the scope of activities and installations covered. The definition of BATs and the determination of the production capacity are key aspects that need to be clarified in this context.
- CIAA believes that BREF documents can act as an effective implementation tool. They should however remain 'reference documents' and should never impose a 'one-technique-fits-all' approach applicable to all cases. Proper consideration of geographical location, local environmental conditions, hygiene and food quality constraints should be given when deciding the techniques to be applied.

# Thematic Strategy on Waste and Revision of the Waste Framework Directive

In December 2005, the Commission adopted a Thematic Strategy on the Prevention and Recycling of Waste and a legislative proposal for a revised Waste Framework Directive (WFD).

In early 2006, the co-decision process on the legislative proposal was launched in first reading in the European Parliament. The overarching aim of the Commission proposal is to reduce the overall environmental impact of resource use by moving towards a "recycling society."

of the thematic strategy on the sustainable use of resources, CIAA believes that both proposals would gain further value if they contained the urgently needed clarification of the distinction between waste and non-waste, including by-products.

While CIAA welcomes the initiative to clarify the WFD and to link the waste strategy more closely with the objectives

- By-products from the F&D industries are products and not waste. They are highly appreciated by other sectors in various recognised and regulated application areas (e.g. in animal feed, food ingredients, fertilisers, bio-fuels, etc). As confirmed by the recent jurisprudence of the European Court of Justice, these by-products cannot be classified as waste. Nevertheless, Member States are still applying inconsistent interpretations of the waste definition and sometimes wrongly classify these by-products as waste.
- To meet this challenge, in 2004 CIAA launched a joint initiative on integrated resource and waste management (IRWM), in cooperation with Commission services and other key actors and developed a decision tool for public authorities and operators to clearly distinguish between (by-)products and waste in the food and drink sector.
- In order to provide legal certainty, it should be clarified that by-products do not fall under the scope of the Waste Framework Directive, based on the criteria applied by the ECJ in its recent jurisprudence. These criteria should be applied uniformly across the EU.



## Integrated Product Policy

The Commission is working on the implementation of its Communication on Integrated Product Policy (IPP), which proposes a strategy to strengthen product-related environmental policies.

While the EU food and drink industry is firmly committed to the continuous improvement of its products' environmental performance, the current IPP approach appears to overlook the social and economic pillars of sustainable development. It

thereby neglects important characteristics of food products, including quality, health, nutritional value, safety and consumer choice.

In order to make Integrated Product Policy a useful tool for sustainable development, CIAA believes that certain improvements in the current IPP approach are required:

- Instead of mapping "hot spots," IPP should foster innovation with a view to continuously improving the product performance at all stages along the life-cycle, including the environmental, economic and social performance of products.
- For this purpose, IPP should be based on the principle of shared responsibility. Each actor along the life-cycle - including suppliers, producers, retailers, consumers and public authorities - has to continuously optimise the environmental performance in their direct sphere of responsibility.
- Given the specific characteristic of food and drink products - ingested by consumers - compliance with the highest nutritional, health and safety requirements constitutes the overriding responsibility of food and drink producers' vis-à-vis the consumer. Mandatory IPP tools aimed at discouraging the consumption of individual products on purely environmental grounds are therefore unsuitable for food and drink products.

## Implementation of the Packaging and Packaging Waste Directive



With a view to assessing the implementation of the Packaging and Packaging Waste Directive (PPWD), the Commission has conducted two studies to evaluate the Directive's impact on both the environment and the

functioning of the internal market. Based on the outcome of these two studies, a Commission report giving recommendations on the future direction of EU packaging policy is due to be released in summer 2006.

- CIAA welcomes the review of the implementation of the PPWD and emphasises the need to balance the environmental objective of the Directive with the requirement to guarantee the functioning of the internal market. The two studies show that while the Directive is succeeding overall in meeting its environmental objective, it is falling short of its other objective of ensuring the proper functioning of the internal market.
- In particular, CIAA emphasises that Member States should not be allowed to create unjustified barriers to trade and distortions of competition by introducing discriminatory national packaging measures, such as eco-taxes, product fees, mandatory deposits or quotas which are not justified on environmental grounds.
- There is no need to systematically promote re-usable packaging as no hierarchy exists between the re-use of packaging and the recovery of packaging waste, and factors that make packaging re-use systems environmentally preferable in certain cases are very context specific.

## Sustainable production

CIAA emphasises the important role that voluntary initiatives by industry can play both in terms of environmental sustainability and better regulation and views these

initiatives as a valid alternative to traditional "command-and-control" types of environmental policy making.

- With a view to strengthening the role of voluntary initiatives as a tool for better regulation, in October 2004 CIAA endorsed a sectoral partnership with the European Commission on sustainable production. The aim of this partnership is to identify sector-specific environmental challenges in the food and drink industry and to agree upon voluntary initiatives to address these challenges in the most cost-effective manner possible.



## National Federations

### **Austria**

FIAA – Fachverband Lebensmittelindustrie

### **Belgium**

FEVIA – Fédération de l'Industrie Alimentaire /  
Federatie Voedingsindustrie

### **Czech Republic**

PKCR - Potravinářská Komora České Republiky

### **Denmark**

FI – Foedevareindustrien

### **Estonia**

ETL – Eesti Toiduainetööstuse Liit

### **Finland**

ETL – Elintarviketeollisuusliitto

### **France**

ANIA – Association Nationale des Industries Alimentaires

### **Germany**

BLL – Bund für Lebensmittelrecht und  
Lebensmittelkunde  
BVE – Bundesvereinigung der Deutschen  
Ernährungsindustrie

### **Greece**

SEVT – Συνδεσμος Ελληνικών Βιομηχανιών Τροφίμων /  
Federation of Hellenic Food Industries

### **Hungary**

EFO SZ – Élelmiszerfeldolgozók Országos Szövetsége

### **Ireland**

FDII – Food & Drink Industry Ireland

### **Italy**

FEDERALIMENTARE – Federazione Italiana dell'industria  
Alimentare

### **Latvia**

LPUF – Latvijas Pārtikas Uzņēmumu Federācija

### **Luxembourg**

FIAL – Fédération des Industries Agro-alimentaires  
Luxembourgeoises

### **Poland**

PPFZ – Polska Federacja Producentów Żywności

### **Portugal**

FIPA – Federação das Indústrias Portuguesas Agro-  
alimentares

### **Slovakia**

UPZPPS – Unia podnikatel'ov a zamestnávateľ'ov  
v potravinárskom priemysle na Slovensku

PKS - Potravinářská Komora Slovenska

### **Slovenia**

GZS – Gospodarska Zbornica Slovenije

### **Spain**

FIAB – Federación Española de Industria de la  
Alimentación y Bebidas

### **Sweden**

LI – Livsmedelsföretagen

### **The Netherlands**

FNLI – Federatie Nederlandse Levensmiddelen Industrie

### **United Kingdom**

FDf – Food & Drink Federation

### **Observers:**

### **Norway**

NBL – Næringsmiddelbedriftenes Landsforening

### **Romania**

Romalimenta – Federatia Patronala din Industria  
Alimentara

### **Turkey**

GDF - Türkiye Gıda ve İçecek Sanayii Dernekleri  
Federasyonu

## Sectors

### **Bakery**

AIBI

### **Beer**

THE BREWERS OF EUROPE

### **Bottled waters**

EFBW

### **Breakfast cereal**

CEEREAL

### **Broth & soup**

FAIBP

### **Cereal flour**

GAM

### **Chocolate, biscuits & confectionery**

CAOBISCO

### **Dairy products**

EDA

### **Dietetic products**

IDACE

### **Fruit & vegetable juices**

AIJN

### **Fruit & vegetable preserves**

OEITFL

### **Ice cream**

EUROGLACES

### **Intermediate products for bakery & confectionery**

FEDIMA

### **Isoglucose**

API

### **Margarine**

IMACE

### **Non-alcoholic beverages**

UNESDA

### **Oils**

FEDIOL

### **Pasta**

UNAFPA

### **Pet food**

FEDIAF

### **Processed meat**

CLITRAVI

### **Processed potatoes**

UEITP

### **Salt**

EUSALT

### **Sauce & condiment**

FIC

### **Semolina**

SEMOULIERS

### **Snacks**

ESA

### **Soluble & roasted coffee**

ECF

### **Spices**

ESA

### **Starch**

AAF

### **Sugar**

CEFS

### **Tea & herbal infusions**

EHIA/ETC

### **Vegetable proteins**

EUVEPRO

### **Yeast**

COFALEC

## Major food and drink companies

ADM

BUNGE

CADBURY SCHWEPES

CAMPBELL FRANCE HOLDING

CARGILL

COCA-COLA

DANONE

FERRERO

HEINEKEN

HEINZ

INBEV

KELLOGG'S

KRAFT FOODS

MASTERFOODS

NESTLE EUROPE

PEPSICO

PERNOD RICARD

PROCTER & GAMBLE

SARA LEE

SÜDZUCKER

TATE & LYLE

UNILEVER





Confédération des industries agro-alimentaires de l'UE  
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