

Position Paper

UEAPME¹ position on 'Food Sustainability'

UEAPME, during the last days, has negotiated in the 'Stakeholder dialogue group for the sustainable food chain' in order to try to reach a common position on a more sustainable European food supply chain. As the stakeholder group was not willing to take into account the specific SME needs we have drafted this position paper which we urge the European Institutions to take into account in its forthcoming Communication.

UEAPME welcomes the European Commission's Europe 2020 Strategy for smart, sustainable and inclusive growth, its Resource Efficiency Flagship Initiative, and its intention to develop a long-term and holistic approach to the sustainability of food systems in its forthcoming Communication.

Recently, a number of high-level global, national and regional initiatives have been set up to address the wide-range of issues threatening the sustainability of the global food system. Europe plays an important role in this system, but comes less-prepared to face the often interrelated challenges and opportunities which lie ahead. In order for enterprises and in particular small and medium sized enterprises to operate on the different marks they need to find a practical framework fit for purpose.

The food sector is very diverse, given the number of small and micro businesses in Europe (over 1 million), their diversity on the activities but also on the diversity of markets (local, national or international) (direct sales to consumers but also sell to other businesses), we consider a specific and suitable approach is necessary. Any EU initiative to safeguarding food sustainability needs to be holistic and should aim for value creation in all three pillars of sustainability (social, economic and environmental dimensions).

SMEs from all parts of the food chain² play a key role in the EU. In addition to providing consumers, with a large choice of safe, nutritious, tasty, seasonable and affordable food, the EU food chain is central to employment and growth across all EU Member States and generates economic activity also in rural areas. Food production and consumption is also a vital part of Europe's cultural heritage and its diversity and plays an important role in social cohesion.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

² Food chain: any business involved in the food chain from suppliers to consumers
UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES

EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE

EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES

UNIONE EUROPEA DELL'ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

Vision

The sustainability of food systems refers to the continuous engagement of food system stakeholders to achieve “low environmental impacts while contributing to food and nutrition security and to healthy life for present and future generations”³. These systems should be “protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources”⁴

UEAPME sets out to support the policy but makes some recommendations.

Horizontal Approach

- In order to render packaging and disposal processes more effective existing logistic networks should be increased and the creation of new networks should be supported. Therefore, the advantages of cooperation between companies along the supply chain should be made more prominent amongst SMEs.
- Ensure proper **implementation and effective enforcement** of existing EU legislation;
- Ensure R&D funding, both at EU and Member State level, to encourage **innovation, knowledge transfer, training, and investment** in resource efficient technologies and **compatible with the seasonality of products and environmentally** sustainable production **and distribution** methods, particularly among small and medium-sized enterprises.
- Foster a **link** between the results of the **medical-scientific research in the food sector and the world of food producers**, including adequate training of both operators in line with the outcome of this research.
- **Reassess and recognise traditional methods** (*methods which use more human workforce than machine work force and therefore foster by nature sustainability*) of production and conservation compatible (in line with medical and scientific standards in the market). This would have a positive impact on social aspects but also on the environmental ones.
- Promote (in addition to the nutritional aspects of those products that are useful to make appropriate dietary choices (cfr regulation 1169/2011 implementation November 2015)) the **knowledge of the production processes and the organoleptic quality values**, which should be essential elements of educational programmes addressed to children.

³ <http://www.fao.org/docrep/018/i3300e/i3300e01.pdf>

⁴ <http://www.fao.org/docrep/018/i3300e/i3300e01.pdf>

Economic Pillar

- Support the **internationalization of enterprises**, in particular of SMEs;
- Ensure a well-functioning EU **Single market** through the removal of barriers to trade;
- Guarantee contact and **coordination** among all stakeholders;
- Fight against **counterfeiting and** better communicate the excellence and the “cultural value” of ‘place of origin’ or **‘Made in Europe’**, also boost the legal value of existing designations of origin through bilateral and multilateral agreements (*cfr regulation 1151/2012 – on quality schemes for agricultural products and foodstuffs*).
- Realize certified collective marks to give value to the **specificity of manufacturing** processes in SMEs;
- Ensure **good trading practices along the food chain** among others through the voluntary framework for implementing the Principles of Good Practice for Vertical Relationships in the Food Supply Chain⁵.
- Identify effective industrial policy instruments that facilitate the aggregation (in particular for micro enterprises) and low-cost marketing between and for micro and SMEs.
- Better integrate the **value of every actor in the food chain**.

Social Pillar

- Ensure the attractiveness of **working in SMEs of the food chain**, with more and better jobs, through **life long learning** based on improved quality and availability of education and training through shared responsibility: enterprise, workers and the public.
- Tackle **unemployment**, particularly among **young people** through work based learning including apprenticeships to better meet labour market needs and tackle skills miss-matching for an easy transition to the labour market (coaching, tutoring, mentoring);
- Involve **social partners** at EU and/or national level to better link vocational education and training to ensure education and training skills meet labour market demands.
- Raise awareness of the importance of job creation in enterprises of the food chain and **encourage entrepreneurship** and entrepreneurial skills;
- Maintain a system of **voluntary and diverse Corporate-social-responsibility** CSR-activities for SMEs. In an existing system of global corporate social responsibility *it should be stressed that non-financial disclosure has to be considered as a voluntary engagement of the entrepreneur, who should remain free to decide how far, or what and how he/she is willing to disclose. Any disclosure obligation of non-financial information or even certification of the reports is not only too expensive and often not feasible for SMEs, but would also be counterproductive to the voluntary and diverse CSR-activities of SMEs.*

⁵ <http://www.supplychaininitiative.eu/>

Environmental Pillar

- Environmental laws, but all legislative corpus in general, should aim to establish rules that foresee few, clear and simple obligations and calibrate the controls and sanctions in relation to the enterprise's dimension.
- **Environmental footprint methodologies** need to be voluntary, feasible (in terms of costs and real interest) and implementable by SMEs.
- Support SMEs to **improve their environmental performance**: SME structure and way of operating require a framework allowing them to go greener and implement sustainability policy (*by tailored information, technical assistance at local level preferably for free or for very low cost, access to finance which enable them to pay process or production changes*).

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