

**‘FARM TO FORK’ STRATEGY ROADMAP**

**- COMMENTS OF INDEPENDENT RETAIL EUROPE -**

**11 MARCH 2020**



## INTRODUCTION

---

Independent Retail Europe is the voice of groups of independent retailers in the food as well as non-food sectors at EU level.

We welcome that the European Commission recognises the horizontal nature of sustainability in the food sector. This is a vast topic that concerns a wide amount of policy areas – social and consumer affairs, environment, internal market, trade, development, etc. – as well as sectors – farming, food industry, packaging industry, all forms of distribution, and trade. We are of the opinion that these many aspects cannot be seen in isolation, and can therefore not be prioritized or legislated in isolation.

It is therefore up to all involved actors to develop sustainable solutions for the future.

Our members in this regard are already very active, for instance they have many measures in place to limit food as well as packaging waste, they seek to source responsibly, they have long-term contracts with farmers and they nudge consumers to make healthy choices.

As an active member of several key stakeholder groups, such as the European Commission's Advisory Group on the Food Chain and Animal and Plant Health, of the Platform for Food Waste and Food Donations as well as of the Stakeholder Consultation Group for the Fitness check of EU consumer and marketing law, Independent Retail Europe has been feeding into policy developments in this area for a very long time.

In light of our active involvement in the European Commission's activities in the area of sustainable food, we will contribute in a more detailed way to other stages of the pre-legislative/legislative process of the 'Farm to Fork' strategy.

We are hence limiting ourselves to two preliminary comments on this roadmap.

## COMMENTS OF INDEPENDENT RETAIL EUROPE

---

### 1. Clear responsibilities for operators

Every actor in the supply chain has its role to play to achieve a more sustainable food supply chain, whereby one of the basic principles as provided in Article 17 of the General Food Law (Regulation (EC) 178/2002) should continue to apply: Business operators can only be responsible for activities "*within the businesses under their control*". Consequently, like for every business operator, retailer responsibility for sustainable foods should also be limited to what retailers can actually control.

### 2. Smart provision of food information to consumers

It is important to inform consumers. Experience has shown that food labels can only do this to a limited extent. Too much information overloads the label and results in the information not being read or understood by the consumer. Explicit labelling, such as a traffic light system, is more straightforward but cannot be the sole solution. For example: olive oil would be marked as red but is actually healthy when consumed in moderation. Educating consumers about healthy choices and a healthy lifestyle can therefore only be done by means of a comprehensive strategy involving all food supply chain operators

and public education campaigns, such as in schools. Retailers are ready to play their role, as our members already do. However, retailers should and cannot be the only educators.

---

Original version: English – Brussels, 11 March 2020

*Established in 1963, **Independent Retail Europe** (formerly UGAL – the Union of groups of independent retailers of Europe) is the European association that acts as an umbrella organisation for the main groups of independent retailers in the food and non-food sectors.*

*Independent Retail Europe represents retail groups characterised by the provision of a support network to independent SME retail entrepreneurs; joint purchasing of goods and services to attain efficiencies and economies of scale, as well as respect for the independent character of the individual retailer. Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers.*

*Independent Retail Europe represents 24 groups and their 380.980,00 independent retailers, who manage more than 757.000 sales outlets, with a combined retail turnover of more than 971 billion euros and generating a combined wholesale turnover of 291 billion euros. This represents a total employment of more than 6.486.000 persons.*

*More information about Independent Retail Europe under [www.independentretailleurope.eu](http://www.independentretailleurope.eu)*