## **EUROPEAN COMMISSION**



Brussels, 18 May 2006

# TOWARDS A REFORM OF THE COMMON MARKET ORGANISATION FOR THE FRESH AND PROCESSED FRUIT AND VEGETABLE SECTORS

#### CONSULTATION DOCUMENT FOR IMPACT ASSESSMENT

#### 1. CONTEXT

In October 2005, drawing its first conclusions from the debate launched in 2004 by the publication of the report on the simplification of the Fruit and Vegetable Common Market Organisation (CMO)<sup>1</sup>, the Commission said that in 2006 it would propose a reform covering both the fresh and processed sectors.<sup>2</sup>

In keeping with its commitment to better legislation, the Commission proposal would be accompanied by an analysis of the economic, social and environmental aspects of the problems linked to the CMO and of the impact, the advantages and drawbacks of different options to respond to these issues.

To facilitate a multi-dimensional analysis of the questions studied and the formulation of proposals that would encourage synergy between Common Agricultural Policy measures and actions taken under other policies that influence the development of the horticultural sector or that are influenced by the CMO, the impact analysis will be guided by an interservice group (ISG), made up of Commission representatives from all the services concerned. The Group's report is scheduled for October 2006. By that time, independent evaluations on the functioning of the CMO should also be ready.

Since it was set up in November 2005, the ISG has organised a first series of hearings with experts and stakeholders. On this basis, and taking into account the views expressed during the simplification debate, the conclusions of the Dutch Presidency and the opinion of the Parliament, a number of themes and options were selected. These are now set out in this document.

The aim of this consultation is to let interested parties know the hypotheses the Commission services are working on and to ask for contributions. These should be sent to Cristina LOBILLO BORRERO, Secretary of the "Fruit and Vegetables" ISG, at the address given at the end of the document.

Contributions received by 13 July 2006 – the closing date of the consultation – will be taken into account in the report.

<sup>&</sup>lt;sup>1</sup> COM (2004) 549 of 10 August 2004.

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<sup>&</sup>lt;sup>2</sup> COM (2005) 531 of 25 October 2005.

## 2. QUESTIONS AND PROBLEMS

The last extensive reform in 1996 put the Fruit and Vegetable CMO at the forefront of the development of the Common Agricultural Policy, introducing modifications that were extended to other sectors by Agenda 2000 and the 2003 CAP reforms. Changes included a plan for the progressive reduction of support for short-term market intervention and the strengthening of structural aid to improve competitiveness, which aimed to help producers develop their capacity to adapt to market demand.

The producer organisations (POs) - already recognised for their role in regrouping supply and balancing the market power of the agri-food industry and the big retail chains - were granted an enlarged set of aids. These were better suited to helping the sector to meet quality standards, the demand for variety and environmental protection, which prefigured the introduction of cross-compliance and the importance of the agri-environmental measures. In the absence of income support, the POs became the main channel for CAP support to fruit and vegetable producers. They were considered to be the cornerstone of the CMO.

Globally, the diagnosis that resulted in the development of the CMO towards its current structure remains valid today. The main basic trends have been confirmed, although affected by new developments such as enlargement, the reform of the CAP and the continuing move towards greater trade liberalisation, all of which pose new problems. Taken together, they set the context for the next reform of the Fruit and Vegetable CMO and dictate the agenda for the type of analysis that is needed.

## 2.1. Fall in consumption

The decline in the consumption of fruit and vegetables in Europe is probably the most surprising facet of developments in recent years, especially considering the general consensus on their importance for a balanced diet, which in turn plays a primordial role for the prevention of chronic sickness and premature death.

Despite promotion efforts, average consumption of fruit and vegetables remains well below the level recommended by the World Health Organisation (WHO) and nutrition experts, and is even tending to fall further. The Commission has recently drawn attention to the importance of fruit and vegetables for the health and is seeking advice on measures that could help to improve their appeal, availability, accessibility and affordability<sup>3</sup>.

Linked to changing life styles and eating habits, the decline in the consumption of fruit and vegetables also reflects how important eating out has become; it now represents more than half of all the meals eaten by Europeans. It also shows the need for a new synergy between the tools of the CMO, agricultural and other policies and private initiatives that aim to bring consumption up to the level that is desirable from the health point of view.

Green Paper "Promoting healthy diets and physical activity: Towards a European strategy for the prevention of overweight, obesity and chronic diseases ", COM (2005) 637 of 8.12.05

## 2.2. Imbalance in the supply and distribution chain

The move towards concentration in the agri-food industry is growing, especially in large-scale retailing. The number of supermarket chains is falling, with the result that their purchasing power on the market is growing stronger, along with their capacity to influence the supply chain. Able to buy huge quantities at very competitive rates, they are now in the position to impose specifications, the cost of which often falls to the producer.

In contrast to these developments, the concentration of supply by producer organisations is stagnating at between 30% and 40%, rather than the 60% initially expected, and may even be falling.

In a few Member States whose agricultural production is made up to a large part of horticulture, and where the producer organisations are finding it difficult to develop, producers continue to be excluded from support by the CMO. The enlargement of the Union to 25, which has emphasised the socio-economic diversity of the sector and the importance of certain products not covered by the CMO, has made the situation worse.

## 2.3. Limited appeal of the POs

This first observation leads us to question why producers are dissatisfied with the POs and their capacity to take account of their varied situations and needs: for example, those of producers outside the major producing areas, peri-urban producers, producers in outlying areas, organic producers, traditional producers in non-traditional regions, producers for the new short distribution channels or those who sell direct to the market.

It also raises the question of cooperation between the different actors of the supply and distribution chain and the regulation of the major retailers' buying power by instruments that could complement competition policy, which remains primarily geared towards protecting competition at the same level of the food chain.

# 2.4. Links with the decoupling of support

The reform of the CAP in 2003 did not directly target fruit and vegetable producers. The changes it introduced did however have an impact on their situation.

The introduction of decoupled payments encourages the market-orientation of farmers while guaranteeing them a minimum income. This is a new element that has certain consequences. As a general rule, fruit and vegetable producers do not benefit from direct income support and are excluded from this regime. In parallel, in order to protect them from potential competition from farmers who do benefit from the regime, a ban on growing fruit and vegetables on land used to generate single payment rights was established.

By definition, this does not apply in those countries that opted for regionalisation. In all the other Member States where it has been introduced it could lead to "triangular" situations, i.e. payment rights being activated on land that is eligible but which did not generate payment rights because, for example, it had been taken out of production up to then because it was less productive, and horticulture being practised on fertile land which had generated rights.

The exclusion of fruit and vegetable producers from the single payment regime, as well as raising questions of fairness, could also give rise to control problems that would complicate the management of the regime. It should also be evaluated in the light of recent WTO rulings. However, as the questions raised are very general in nature, the ISG considered that to analyse them was not part of their mandate.

# 2.5. Compatibility with WTO commitments

The decoupling of support introduced by the CAP reform is also part of the multilateral move towards reducing forms of support that distort competition and trade and is in favour of an equitable liberalisation of agricultural trade. Seen from this angle, the prospect of decoupling may look different for those CMO support measures that are currently granted according to quantities produced, exported or withdrawn from the market and which, on this basis, are now subject to reduction commitments in the WTO.

Three types of support in the CMO correspond to this definition: production aid and aid to producers where the raw product is destined for processing; refunds to ensure competitiveness on export markets; and payments for *ad hoc* withdrawals, in order to reduce excess supply on the market.

With the reorientation of 1996, withdrawal operations and exports were supported less and less, and the corresponding EAGGF expenditure dropped dramatically. Today withdrawals represent 4.4% of the finance for the fresh produce sector, and 0.7% of the processed sector. Less than a third of Community exports today benefit from refunds; expenditure represents 1.7% of the commercial value of the produce and 1.6% of the CMO's budget. The volumes as well as the budgets concerned are well below the WTO's authorised ceilings (56% and 28% respectively).

Production and processing aids are thus today the principle support mechanisms of the CMO that are linked to production. Amounting to €54 million in 2005, they make up 97% of the expenditure on producers of fruit and vegetables for processing, and will be subject to reduction commitments on a scale to be decided at the WTO.

## 2.6. Coherence with rural development aid

Rural development aid is gradually being confirmed as the CAP's main vector of support for structural measures to improve the competitiveness of holdings and more environmentally-friendly cultivation practices (agri-environmental measures). Following the reforms of Agenda 2000 and 2003, this leading role has now been confirmed by the Regulation adopted in 2005 establishing the aims and priorities for rural development in the period 2007-2013. This raises the question of coherence and synergy of support to fruit and vegetable producers under the CMO and in the context of rural development programmes.

# 2.7. Short-term crises

Short-term crises continue to affect the income of fruit and vegetable producers. Important imbalances - even if sporadic - between supply and demand, lead to selling prices falling below the cost price, and can even endanger the economic survival of the producer. This can arise from the convergence of several factors.

The balance between supply and demand on the fruit and vegetable market is inherently unstable. The produce is perishable and cannot be stored. Produce is very sensitive to

climatic changes that can hasten maturation and the product's arrival on the market. The same applies to consumption: a change of temperature sometimes has the effect of turning consumers away from seasonal produce already available on the market. In recent years the market has also suffered a double downward pressure on prices: competition from imports, which increase steadily as a result of trade liberalisation; and from the big food retailers, who sometimes resort to aggressive trade practices. The market is also occasionally disturbed by export incidents or a sudden drop in consumption following a health scare.

Faced with these short-term crises, the CMO's market instruments and support measures for organising supply at best offer only partial prevention. The search for a more appropriate response brings us back to the general issue, now under debate, of risk and crisis management in agriculture. Taking into account the specific factors of instability mentioned, the lack of income support for producers and the drastic cut in compensation for withdrawal operations, the issue is even more acute for the fruit and vegetable sector. Notably, the Council recognised this when raising the question of the appropriateness of a specific instrument in the CMO.

# 2.8. Impact on the environment

Protection of the environment and natural resources has been part of the Fruit and Vegetable CMO since 1996. Promotion of agricultural practices that respect the environment was made a compulsory axis of the support for POs. Well before environmental cross-compliance was introduced, the Fruit and Vegetable CMO was therefore a pioneer in the first pillar of the CAP.

On the ground, however, the impact of the production and marketing of fruit and vegetables on the environment remains mixed. The sector is a big consumer of water, also in regions where this represents a long-term deterioration of the environment. Sometimes, inefficient irrigation systems continue to be used, entailing a massive loss of water. Extremely intensive growing methods are often used, consuming fossil fuel (heated greenhouses, plastic tunnels) and inputs that can contaminate the soil and groundwater with pesticides, heavy metals or nitrates, or cause health problems to farm workers. It also generates an enormous amount of waste.

The development of trade favours consistency of supply throughout the year, while increasing substantially the distance between the place of production and consumption. Aside from the direct environmental cost of packaging and transport, this trend has also encouraged homogenisation, with varieties being selected on the basis of criteria such as their ability to withstand transportation, and to the detriment of qualities of taste and biodiversity.

All in all, and with a view to incorporating the CMO's rules on environmental protection into the general cross-compliance rules, the question arises as to how the CMO's environmental measures should be adapted and targeted on the main problems posed to the environment today by fruit and vegetable production and marketing methods.

## 2.9. Work and employment conditions

Employment and working conditions in the fruit and vegetable sector are still characterised by the importance of family and seasonal labour, with strong seasonal peaks in the length of the working day. At these times work accidents are substantially above average. Public opinion is regularly alerted by stories about work in the black, and disregard for collective agreements or health and safety rules. This represents a disloyal competitive pressure exerted on responsible producers.

Also in the area of social issues, employment in the processing industry and its contribution to the economic activity of certain producing regions, is another important theme for analysis in the reform.

## 2.10. The question of standards

The CMO's marketing standards, aligned to international standards, are intended to facilitate trade by guaranteeing harmonisation at European and international level. These standards contribute to market transparency and thereby to reduced transaction costs along the fruit and vegetable distribution chain. These standards also represent a concrete objective that enables producers to adapt their product to the overall market. In recent years they have evolved, to start taking into account objective, measurable criteria linked to flavour and the nutritional quality of the product. These organoleptic characteristics are only rarely indicated on the product itself, even if this information is of direct interest to the consumer.

Responding to new demands and seeking to differentiate between products, to capture consumers who care more about the nutritional quality of their food and/or sustainable development, and in parallel to the development of shorter distribution chains, or starting from organic or integrated production, which have their own standards and labels or are easier to identify, the distribution chains are setting up their own labels and standards. Superimposed on regulatory requirements, these standards often become, for the producer, a condition of access to the market.

Despite the different status and objectives of these various types of norms and standards, this development brings an added dimension to the question of simplification of the CMO, in relation to the development of other standardisation systems applicable to trade in fruit and vegetables (Codex, EEC-UNO). It raises the question of the future role of European standardisation in the promotion of quality and sustainable development.

#### 3. AIMS OF THE REFORM

On the basis of the problems identified and in the framework of today's main policy orientations – the sustainable development and Lisbon strategies, and the reformed CAP – as well as constraints linked to our international commitments and the Union's financial perspectives, the options and themes for the reform of the CMO selected by the ISG tend towards the following aims:

- contribute to a better distribution of the value along the chain;

- strengthen the coherence between the structural measures in the CMO and those in the rural development policy;
- bring the CMO's instruments closer to the approach of the reformed CAP;
- help the horticultural sector overcome short-term crises;
- encourage better nutrition for better health among Europeans, by advocating the consumption of fruit and vegetables;
- increase the coherence between the environmental approaches of the CMO, the reformed CAP and its second pillar;
- target the CMO's environmental approach on the main problems posed by the production and marketing of fruit and vegetables;
- simplify marketing standards and direct them towards the promotion of quality and sustainable development;
- promote the monitoring of relations and cooperation within the value chain.

#### 4. OPTIONS AND THEMES STUDIED

The themes and options that make up the skeleton of the ISG's work programme are presented here, regrouped by objective. Their study should help make apparent the consequences and impact of different possibilities for the future of the CMO and so contribute to enriching the information base available to the EU's policy-makers. The options are often complementary and certain of their elements could be combined in a new option. Sometimes they are mutually exclusive. The themes selected do not all arise from the CAP nor only from the CMO to be reformed. Their study should allow an evaluation of the contribution that other policies, instruments and actors could make to the overall aims of the reform.

## 4.1. Contribute to a better balance within the value chain

# 4.1.1. Producer organisations

With a view to increasing the appeal of the POs and so contribute to a better organisation of the supply side, and in order to improve the coherence of support for their activities under the two pillars of the CAP, the ISG intends to study the impact of three broad families of options, some elements of which could also be combined.

The options can be distinguished by their approach to the differences between the rules that govern the possibilities of support to structural measures for the POs. These differences stem from the decentralised definition of implementing rules for the CMO and for rural development programmes, in accordance with the subsidiarity principle. In some cases, in particular in trans-national situations, this can lead to certain POs being excluded from community support.

The "Status quo" option would keep the present forms of structural and agrienvironmental support for POs, as well as the principles that currently govern how this is shared with support from rural development funds. This therefore excludes any measure explicitly supported by only one of the two instruments.

To increase the appeal of the POs and make them more adept at catering for a wider range of producers, this option would simplify and make more flexible certain rules for the management and recognition of the POs, drawing inspiration from proposals put forward during the simplification debate. The development of POs in regions where they are poorly represented would also be encouraged, as well as mergers, partnerships and joint activities between POs.

The "Synergy" option goes back to the incompatibility of supporting a structural or agrienvironmental measure through the CMO as well as by rural development programmes, and, more explicitly, organises the conditions for a synergy.

The "**Transfer**" option seeks to resolve the problems of coherence between the CMO and the rural development programmes by transferring the possibilities to support structural and agri-environmental measures to the second pillar of the CAP.

The analysis will seek to evaluate the consequences, advantages and disadvantages of the three families of option and, if necessary, identify an option that combines certain elements from each. Other proposals submitted will also be evaluated, with a view to improving the organisation of the supply side of the sector.

## 4.1.2. Support the improvement of inter-professional relations

The current CMO includes provisions that favour the setting up of inter-professional agreements. They are optional, and have up to now been used by a very small number of Member States. Three families of option are considered.

Under the "**Status quo**" option the current provisions are kept and adapted to make the setting up of inter-professional agreements more appealing. The study of this option depends, however, on such proposals being presented.

The "**Observatory**" option supposes the creation of a European mechanism to follow prices and marketing practices within the distribution chain. On the basis of concrete experiences, a code of good conduct could be drawn up and serve as a reference for advice and arbitration between interested parties.

The "**Suppression**" option supposes that the provisions linked to inter-professional agreements are abolished.

The analysis will consider the feasibility of an Observatory. It will also consider any proposals submitted in the framework of the Status quo option, in order to evaluate the advantages and drawbacks of the three options.

# 4.1.3. Encourage cooperation with third country horticulturalists

One of the vocations of the current CMO is to encourage producers in the same region, Member State or even several Member States to work together. With a view to extending this vocation to producers in partner countries, the feasibility of a "Co-development" option will be looked at, with two distinct parts.

The external part would mobilise funds available in the framework of development aid policy under the EDF or MEDA, in order to support producer organisations in the partner countries, similar to those that exist in the Union.

The internal part would provide for incentives to European POs to engage in activities jointly with POs in third countries.

# 4.2. Taking international commitments into account

With a view to making production aids in the processed products sector compatible with WTO reduction commitments, the ISG plans to analyse the impact of three families of option.

The "**Status quo**" option will maintain current aids and adapt their level according to the provisions on reduction in the framework of the Doha Round.

The "**Decoupling**" option envisages that the current aids are transformed and producers of fruit and vegetables for processing are integrated into the decoupled payment regime, on the basis of historical references. To avoid any abrupt fall in production, the analysis will also look at variants of partial decoupling, that could apply to different products.

The "Area Aid" option envisages the transformation of production aids into income aids linked to area, in order to limit any possible fall in production.

The analysis will seek to evaluate the consequences of these options and their variants on production (quantity, quality) and on the price of the fruit and vegetables concerned, and on the conditions of supply to the first processing industry. As far as possible it will also seek to evaluate their indirect effect on the activity of the processing industries, on employment and on the regions most concerned.

#### 4.3. Prevent and overcome short-term crises

Three families of option are envisaged for management systems for crises specific to the fruit and vegetable sector, as well as a specific option for dual-purpose products. The different systems are distinguished in particular by the type of intervention, the scale of Community contribution and the type and level of management (private, public, mixed, Community or decentralised).

The aim of all the options under consideration is to try to prevent, or to help producers face up to, **short-term crises**. In no case are they intended to prevent the adaptation of European production to demand. They are not an answer to structural crises of over-production or poor adaptation of supply to an evolving demand, and they should not discourage producers from adapting to the realities of the market.

The option "**Status Quo Plus**" provides for the maintenance of the current system of withdrawals as the main crisis management tool. It would use methods of compensation adapted to the WTO commitments and complementary provisions that would ensure a more socially-acceptable destination for the quantities withdrawn.

The "Insurance" option envisages a Community contribution to the payment of insurance premiums against crises resulting from natural causes. This would correspond to the advance application to the fruit and vegetable sector of one of the options discussed in the context of the debate on the management of risk and crises in agriculture.

The "**Dual use**" option would incorporate into the CMO specific arrangements between POs and the processing industry for dual use products, with the aim of ensuring a supplementary outlet in the event of short-term crises on the fresh produce market.

The "**Fund**" option envisages that Member States that wish to could create a Fund, cofinanced from CMO resources, which would take charge of managing preventive or crisis measures, within a framework to be established at European level. Access to the Fund could be limited to members of POs, or extended to all producers in a region or in a Member State, under conditions that would be defined. The Fund would finance a range of actions that could respond rapidly to crises similar to those envisaged under the other options. The extent of Community co-financing and the range of actions will be subject to variants.

The analysis will examine the advantages and drawbacks of these different options, taking into account their effectiveness and the cost of setting them up, as well as their compatibility with competition rules and WTO commitments.

# 4.4. Simplification of standards

The need for Community standards for trade was already raised during the 1996 reform, when three options were envisaged. They are now completed by an option that encourages synergy between public and private standards.

The "**Status quo**" option would keep the CMO's present body of standards – in fact totally aligned to international standards – with possible improvements to clarify or simplify some provisions, following the procedure in force, i.e. after modification of the EEC-UNO standard in question.

The "Simplification" option would draw up a Community text that included all the essential demands common to all fruit and vegetables, such as, for example, those concerning labelling and origin, as well as a reference to international standards (EEC-UNO or Codex) to specify, by product, how these essential demands have been met. It would also aim to ensure a better coherence, in the domain of fruit and vegetables, between the standards of the Common Agricultural Policy and Public Health policy.

The "Co-regulation" option envisages the contribution of self- and co-regulation devices to the aims of a European system of standards for fruit and vegetables, and the conditions for a better synergy between public and private standards.

Under the "**Suppression**" option all Community standardisation activities would be abandoned, public initiatives would be replaced by private initiatives and voluntary agreements between the different actors along the chain.

The analysis will evaluate the effect these options would have on the transparency of the market and the adaptation of production to the demands of the market and consumer expectations. It will also examine their compatibility with the international commitments of the Union and their potential for simplification, for the administrations and economic operators.

## 4.5. Promote consumption

With the aim of promoting the consumption of fruit and vegetables, for better health and to fight obesity, the analysis will explore the outlines of a European **Action Plan**.

During a first stage, which could close with a seminar, the plan would be to draw lessons from relevant actions driven by different platforms of actors and, in particular, by the European Platform on Nutrition, Physical Activity and Health, put in place in the framework of "Health and Consumer Protection" policy.

On this basis, the analysis would envisage the conditions for synergy between different policy instruments of the Union that could be mobilised to support and multiply these actions. These might range from influencing supplies to public bodies (schools, hospitals, airports etc) by giving a suitable slant to calls for tender or to conditions for support; programmes supporting information actions, marketing and publicity that encourages consumption; or taste education aimed at young children or target populations; or conditions for specific help from POs to encourage promotional actions at local, national or Community level.

#### 4.6. Preserve the environment

With a view to bringing the CMO's environmental approach closer to that introduced by the reform of the CAP and the second pillar's approach, and to better target the incentives in the CMO on the environmental problems posed by the production and marketing of fruit and vegetables, that vary according to the type of cultivation and region, three families of option will be analysed. Certain of the elements could also be combined.

The "Status Quo Plus" option would keep all the current measures but adapt them to facilitate access to the POs by organic producers, as well as producers who are part of short distribution chains or who sell direct to the market.

The "Green Quota" option would make it compulsory to pay a minimum percentage of the operational fund to actions in favour of environmental protection.

The "Cross-compliance" option would make Community funding of the operational programmes of the PO conditional, according to the environmental impact of the actions planned, in such a way as to target the main environmental problems related to the types of cultivation and the regions concerned. This option would also find ways of ensuring that all producers respect the environment, according to minimum reference levels.

The analysis will seek to evaluate the feasibility of these options and, possibly, to identify a single option that combines certain of their elements.

## 5. AIMS OF THE CONSULTATION

In the opinion of the ISG, the options and topics studied in the framework of the impact analysis correspond to the preoccupations and views of interested parties on the future of the sector, and on the challenges linked to it. This at least in as far as they have arisen from positions expressed in the context of the simplification debate, the analyses consulted and the hearings that took place. In submitting these hypotheses to consultation, along with its work programme, the ISG wishes to gather together the opinions of interested parties on the relevance of the options and topics analysed, with respect to the aims of the reform, as well as any suggestions they may have.

- From the point of view of the reform, are there other problems linked to the functioning of the CMO, apart from those set out here, that the analysis should try to evaluate? What are they? Can you illustrate them?

- Do the options presented seem to you suitable for solving the problems indicated?
- Are they coherent with the aims of the reform?
- If the options can be improved, how should this be done?
- Can you see any other, more effective, options? What are they?
- What kind of difficulties could the options analysed risk running into, if they were put in place?
- What would be the most significant impacts of the options analysed?
- Are there factors or elements of uncertainty that could significantly influence the impact of the options analysed. What are they? What would be their influence?
- Should we try to integrate into the analysis an appreciation of impacts other than those mentioned in the document? Which ones?
- What criteria should be used to judge the advantages and drawbacks of the options analysed, as presented in the document?
- Which actors would be particularly affected if these options were put in place? How would they be affected?
- Who would benefit and why?
- What indicators would best express, in a synthetic way, progress towards achieving the objectives of the reform?

The ISG is aware that the options and topics it has chosen to explore take account of a limited series of factors and that, without modification, they cannot prefigure the full range of political choices that could be offered to the Commission. That is why the ISG is seeking contributions from interested parties who can enrich these options and help assess their feasibility and possible impact.

Within the limits of its possibilities, the ISG also wishes to incorporate into its analysis proposals by interested parties that – in compliance with the international commitments and capacities of the Union – would make it possible to improve the economic, social and environmental sustainability of horticultural production and marketing. Proposals may relate to the Common Agricultural Policy or to other EU policies and actions. Proposals and comments will be easier to take into account in the analysis if they contain verifiable factual elements that make them possible to assess. Please be sure to specify clearly if any elements provided are to remain confidential.

# The consultation will remain open until 13 July 2006.

Please send contributions to:

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