



## Small farms and short supply chains in the European Union

### Position Paper European Coordination Via Campesina

#### Introduction

Small farms are an important rural reality in Europe. With an average area of 14 hectares, small holdings remain the ruling type of farms in the EU27. They represent richness by its “multifunctionality” for the farming economy and the whole society in terms of territories occupation, maintaining biodiversity maintaining, landscapes, economic efficiency and moderation using common goods.

In Europe, three million farms (20 %) have disappeared during the last eight years, mainly Small farms. To stop the Small farm discrimination and disappearance, the EU has to create a regulatory framework allowing the Members States to introduce specific measures for them. These support measures will have to be specifically adapted to the farming reality of every country.

Small farms don't present similar features everywhere. Subsistence farms, small holdings as complement for other jobs, farms providing food for enlarged families, small units to produce-process-sell products to consumers in other places, they adapted to the history and to economical and political, structures of each country or region.

The individual choice to respond to the family needs, the integration in a community, together with the refuse to grow bigger and absorb neighbors' land is also present in many cases. The presence of numerous small farms enables a food that is culturally and naturally rich and varied, although under the strong attack of corporate farming and distribution, which tends to standardize the European diet.

These supports have not to be considered as a way of administrative simplification. On the contrary, Small farms have to be supported to define basics for a fair distribution of subsidies regarding all gains and wealth that they create on the territory.

It is also most important to implement the flexibility that is allowed concerning hygiene regulations for the processing and marketing of farm products.

## Small farms and the Common Agricultural Policy

### **1 Summary of the European Commission's regulatory package proposal published the 12<sup>th</sup> October 2011**

**1<sup>st</sup> pillar** : No recognition of and excluding basic allowance measures for Small Farms. To solicit this measure, farmers have to give up all the direct subsidies received.

**2<sup>nd</sup> pillar** : In its introduction, the Rural Development regulation is still wide and vague. A specific program for Small Farms has been mentioned but it is still empty. Besides, a helping measure for the suspension of activities is provided for the Small farms (today, the sum still unknown)

### **2 Reaction of these announcements (presented by ECVC the 25th February to Dacian Ciolos)**

*"Your declared willingness to recognize the social, environmental and economic role of Small farms has provoked a great hope into the countries, and has given courage to many resigned small farmers. However, regulatory translation of these announcements is very disappointing, not to say unacceptable. Into the 1<sup>st</sup> pillar, setting up to small farmers to obtain a small lump sum if they choose to stop their activity, shows that the Commission treats Small farms aside from the global agricultural system, instead of maintain them into it. It is alms offered waiting its disappearance. Besides, it has been proposed into the 2<sup>nd</sup> pillar, an allowance in case of suspension of activities to accelerate this phenomenon.*

*It is still time to correct these measures and guarantee Europe a profitable future and make durable millions of farming jobs for every Member State."*

### **3 Argumentation: Reassert the importance of Small farms, in the 2013 CAP reform**

- In Europe, The largest number of farming structures is Small farms.
- They represent richness by its "multifunctionality" for the farming economy and the entirety of the society in terms of territories occupation, maintaining biodiversity, landscapes, economic efficiency and moderation using common goods.

- They develop a farming model economically efficient, creator of value on territories by optimizing the public resources use thank to energetic autonomy and low level of public subsidies use.
- They are essential to reinforce the link between producers and consumers, to assure and relaunch the local food autonomy, and develop local and traditional farmers how-know.
- Small farms ensure the farmers renewal and the farming worker class' rejuvenation thank to the creation of new structures and the easiness of transmission.
- Small farm model promote the women role in the country (there is more women head-farmer in Small farm).

#### **4 To fulfil these goals, what has to be changed into regulatory texts**

##### **4.1 Basics**

- Definition of Small farm has to be adapted at the Member States level as well as the support amount.
- It is necessary to have a real policy for small farmers: measures in the 1<sup>st</sup> and 2<sup>nd</sup> pillars that support small farms and “re-localization” and that reduce red tape.
- To force the Member States to fund these measures.

##### **4.2 Proposal of regulatory modifications**

- To Remove criteria of 1ha and 100€ of subsidizes in 2014 provide by the EU to permit farms to benefit of the support of Small farms (because millions of farmers won't have historical references in 2014 and they won't be considered as farmers).
- To be opposed to 500 – 1000 € ceiling and refuse the excluding character of this support. Small farms shall be supported either by a lump sum which is much higher than 1000 €, or by a scheme which is paid IN ADDITION to the direct payments per hectare.
- To propose a minimal financial support above 15% of the average of the direct sum received by farm and by Member State (about 30 000€ in France).

- To impose on Member States, the use a minimum of 10% of the 1<sup>st</sup> pillar's total amount (7,6 billions € in France).
- To place the coherent measure into the different pillars.
- To allow future farmers (after 2014) to benefit of this support.
- It is very important, that a small farmers' scheme reduces red tape.

## 5 Definition criteria of Small farms

The present rules don't propose definition criteria for Small farms. It is essential, to save time during the application of the measure, to precise these criteria at the EU level.

### Proposal of criteria:

Linked to the production repartition:

- Quantity produced;
- Working capital turnover;
- Area cultivated, number of animals for the production.

Linked to public support allowed:

- Amount of direct subsidizes received.

Linked to the working time and the working force:

- Rate of working time on the farm and working time out of agriculture sector;
- Rate between the head of the farm and the employees;
- Number of workers per hectare.

## **Small farms and Hygiene norms**

The proposal is divided into two levels of actions/suggestions:

### **1. EU level :**

Set up the definition of Good Practices of Hygiene adapted to Small farmers, the creation of Good Practices of Hygiene adapted to Small farmers Guides and the setting up of adapted controls. Make compulsory to all MS to implement flexibility adapted to small farms in regulation texts.

### **2. National levels :**

Recognize and use flexibility into specific local context, because flexibility has to permit the definition and the application of the Good Practices of Hygiene adapted to Small farmers

These two levels of actions/suggestions are presented into this document.

## **1 EU level**

At the EU level, the Hygiene package, applied since 2006, is the base of the hygiene regulations. This corpus (4 regulations and 2 guidelines) defines the main enforceable rules of hygiene to all food.

It is important to underline that its scope is wide and the fixed rules are vague. This lack of precision leads to different interpretation of common rules by veterinary authorities of every Member State. **These free interpretations are real issues for farmers implicated into direct selling for the production as well as the transformation or the sale of their products.**

However it clearly defines that concerning the food hygiene control has to be based on an obligation of results instead of an obligation of means<sup>1</sup>. The Hygiene package imposes for food hygiene controls to have a systemic approach instead systematic one. To allow it, three tools are proposed:

1. The monitoring of the Good Practices of Hygiene, gathered into Good Practices of Hygiene Guides defined by professionals to professionals.
2. The setting up of HACCP methods to analyze own practices and indentify Critical Contamination Point.

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<sup>1</sup> Article 3 : *General Obligations*, regulation (CE) n° 852/2004

3. The setting up of Sanitary Control Plan to ensure the food traceability and to recall products in case of sanitary issue.

It is specifically mentioned for Small structures (=Small farms) the monitoring of Good Practices of Hygiene Guides is enough to guarantee the good hygienic quality of farmed products<sup>2</sup>. Then it is not necessary to implement the two other tools.

**We consider that farmers which produce, transform and sell their own products into “local carriage” are small structures and therefore the respect of Good Practices of Hygiene Guide has to be sufficient to guarantee the quality of their products.**

The Good Practices of Hygiene adapted to Small farmers Guides which have been written until now, still not harmonized at the EU level. Besides, all of them are not considering farming practices at the same level, when they consider it. In the frame of practices exchange among farmers from different countries (Italy, Austria, France and Spain) it was realized that only Austrian farmers have specific Good Practices of Hygiene Guides adapted to their methods of work or sell. About Spain and France, these guidelines don't exist yet (except for the farmed milk transformation in France). It is a lack of recognition of Good Practices of Hygiene used into Small farms. It leads to the disappearance or prevent the creation of many small workshops.

**We consider necessary that EU recognizes the existence of Good Practices of Hygiene specific to Small farms. Identification and recognition of these practices have to be done at the EU level and therefore to allow creations of Good Practices of Hygiene adapted to Small farmers Guides which will make reference in every Member State (directly or through national or local adaptation).**

These guidelines have to favour the situation for small farmers and they should leave as much room to manoeuvre to Member states, always understanding flexibility as an option to apply measures more relaxed than those redacted by the EU, never more restrictive.

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<sup>2</sup> Paragraphs (15) and (16) of Regulation (CE) n° 852/2004

By no means should it be used by Members states that already use national guides to go backward and worsen the situation of small farmers (ie the Austrian national guidelines on hygiene, or the French guide for farm cheese production).

These guidelines will have to specify practices but also adaptations authorized in terms of means and work organization. Then, it is going to be a real systemic approach of the quality of the food produced in Small farms.

**The European regulation should make the adaptation of the hygiene package to small farms mandatory to all Members states.** If Good Practices of Hygiene adapted to Small farmers Guides are set up, methods and levels of control have to be set up too, in the same time by EU. This work has to be done establishing relationship between national farmers unions, veterinary organizations, and consumers. It is thanks to a collaboration work between these actors that Good Practices of Hygiene adapted to Small farmers will be recognized and approved.

**The creation of the Good Practices of Hygiene adapted to Small farmers Guides represents a real opportunity to maintain and increase the number of Small farms in the countries, develop local carriage and maintain food production of quality. The EU have to encourage these initiatives.**

Finally, we agree that the monitoring of Good Practices of Hygiene is necessary to produce safe food. Therefore, it indispensable to train farmers involved into local carriage to follow these practices. These trainings will all the more be adapted and accepted that they will have been built and evaluated by farmers themselves associated with veterinary services. These trainings have to be strongly recommended but not be obligatory.

## **2 National levels**

The Hygiene package considers a Flexibility set up regarding the application of hygiene rules and their controls for:

- 1) Small structures;
- 2) Traditional methods of production;
- 3) Restrained geographic area.

**This recognition of the specificity of particular situations represents for us a real step forwards. However, we note that the Flexibility set up is not done in every Member State, and when it exists, it is not applied with the same “flexibility”. We consider that is due to:**

- a lack of details into the definition of the “particular situations” which could be solved by setting up the “Small farms label”
- a lack of detail concerning the practices of production, transformation and commercialization concerned by the Flexibility. It could be solved thank to the definition of Good Practices of Hygiene specific for Small farms and the writing of corresponding Guides.
- a lack of mutual acquaintance between farmers and veterinary organizations which could be solved by the collaboration work necessary to write these Good Practices of Hygiene adapted to Small farmers Guides.

**The Flexibility’s subsidiarity<sup>3</sup> has to allow local adaptations of the European Hygiene package, insofar it specifies and proposes adapted hygiene measures for Small farms involved into local carriage from the production to the commercialization of their own products.**

The Flexibility has to allow the setting up of Localized Good Practices of Hygiene specific for Small farmers because if Good Practices of Hygiene specific for Small farmers are based on common rules at the EU level, they have to be specified at local level.

Finally, it is important to note that Hygiene package points out that the Flexibility application has to be done with transparency at the EU scale. This means “every project of national measures has to be notified to the Commission and to the other Member States”. Therefore, European Farmers have to be informed of the Flexibility application into the other European countries, and be able to appeal the European Court concerning the application of the Flexibility into their own country.

Members States should translate EU directives or adapt the European guide into national guidelines and most importantly into practical manuals for small producers. The supervisory bodies shall also orientate on those manuals.

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<sup>3</sup> Working Paper of the Commission for facilitating an understanding of certain provisions of flexibility provided in the Hygiene Package, DG SANCO

## Small farms and label “ Products from my farm”

During the review of the Quality package, the The DG Agri proposed the creation of an European label « Product form my farm ». It should be created to simplify direct promotion to consumers. It is a way to reinforce actual or future tools for the rural development. This topic is the main object of a special Working group depending on the Quality advisory group for the dg Agri.

For ECVC, this potential label has to be created to champion « Peasant Farming » (*Agriculture paysanne*).

### **1 What is «peasant farming »**

Sometimes called “small scale sustainable farming” this agriculture, which conflicts with industrial agriculture one, doesn’t follow strict norms, because it is specific to every local situation.

It can be defined by some criteria:

#### **1.1 Sustainability**

That means:

- the biodiversity (animal and plants, natural and cultivated);
- without GMOs;
- autonomy of : decision, management, and also towards the upstream and downstream from production;
- animal and crop productions linked;
- farms transmissibility.

## **1.2 Transformation**

The transformation is made on the farm: except for the cases where the level of investment needed is too important. Farmers have to keep the product property and so the responsibility of it.

All industrial processes are excluded.

## **1.3 Commercialisation**

The marketing has to be direct or in short food supply chain (up to 1 local intermediary).

This label can not be use by big retailers (it doesn't exclude the possibility for farmers to sell their products to supermarkets if they already have one for other way of commercialization).

## **1.4 Farm size**

It has to be define by every Member states through 3 criteria:

- Area (weighted by production and by farmer);
- Maximum number of employees / farmers;
- Farm turnover.

## **2 The opportunity of the label “product from my farm”**

The label “Product of my farm” is on European Commission’s initiative as a result of consumers’ poll. It should promote farm products, particularly for the products which don’t have already quality sign one (Organic farming, Protected origin sign, labels...). In the best case scenario, this label could be created into 3 years.

One label creation “Product from my farm” could be an advantage **if:**

- it supports the “peasants farming” and it respects its criteria;
- it help farmers to access to direct subsidies and to the rural development ones too (1<sup>st</sup> and 2<sup>nd</sup> pillars);
- it helps to recognize the necessary adaptation of hygiene norms (3<sup>rd</sup> pillar).

Finally, if this label “Product of my farm” is created and accepted, an adapted certification system will have to be created too.

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