

# CAOBISCO

Chocolate, Biscuits and Confectionery of Europe

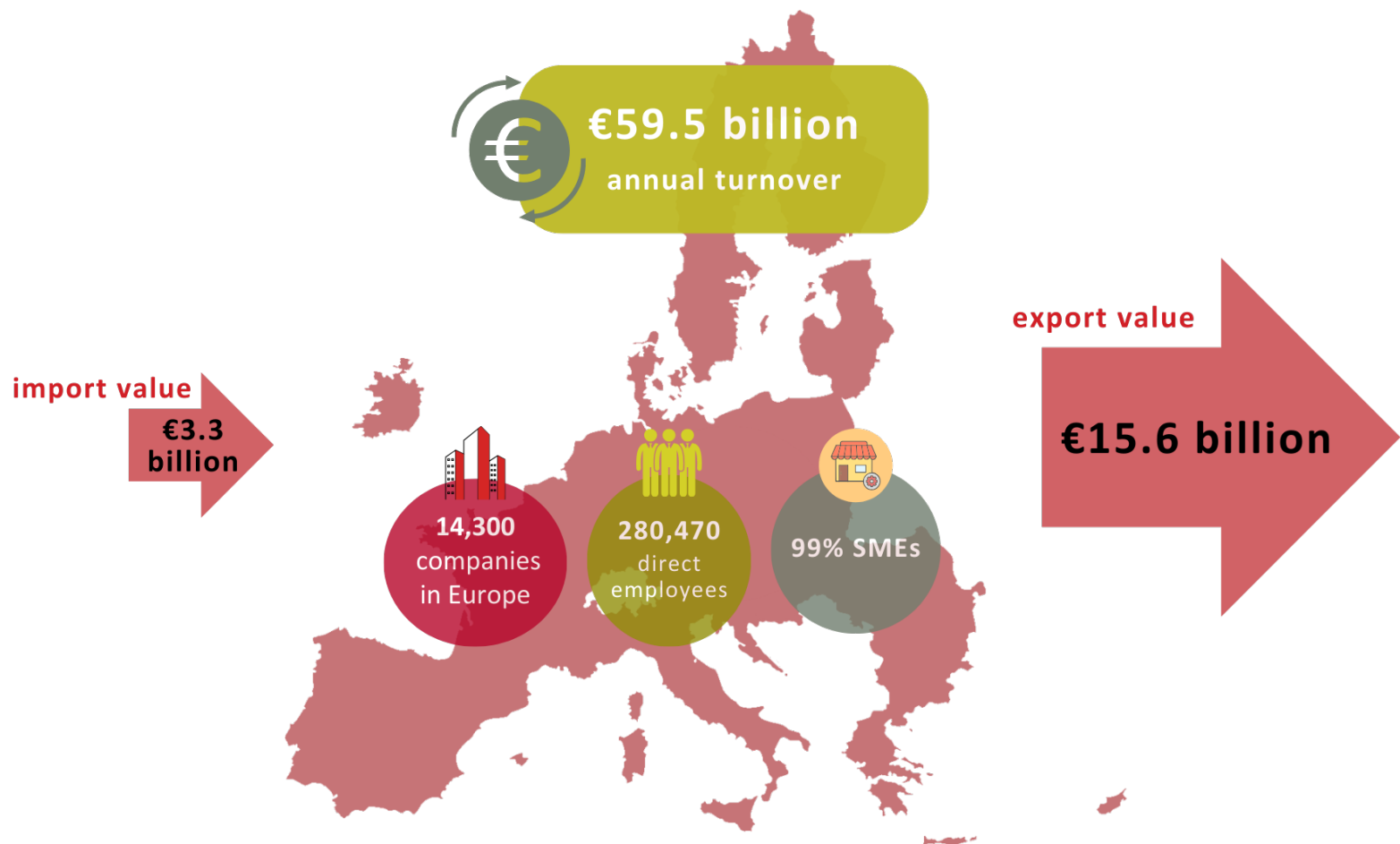
# MANIFESTO

2024-2029 EU POLICY CYCLE



# CAOBISCO MANIFESTO FOR 2024-2029 EU policy cycle

CAOBISCO is the Association of Chocolate, Biscuit and Confectionery Industries of Europe. We proudly represent more than 14 000 European chocolate, biscuits and confectionery manufacturing companies, 99% of which are SMEs.





## Revitalise EU's fair and free trade agenda

### *The value of open strategic autonomy in practice*

The European chocolate, biscuits and confectionery industry is recognised across the world for its high quality and sought-after products. Family-run businesses and SMEs, are the cornerstone of the European Economy and make up the vast majority of our industry. We span timeless tradition and exciting innovation. We are proud of the role we play in supporting European supply chains, buying European farm products, notably cereals, dairy, sugar, and turning them into delicious high value added products, that are enjoyed around the world. We are proud of the contribution that our strong export surplus makes to Europe's wealth. But none of this can be taken for granted, especially when facing today's climatic, social, economic and geopolitical challenges. **We therefore look to policy makers to help to:**



**Promote a proactive Trade Agenda.** Solid bilateral and multilateral trade agreements enable us to import raw materials and inputs and export high added value products. They also contribute to developing common rules and a level playing field globally, which is important to ensuring fair competition and safe products. Negotiations with Ukraine, MERCOSUR, Thailand and Australia will be particularly important for our industry and our continued positive contribution to the growth of the European economy as a whole.

**Secure access to competitive supply of sustainably produced raw materials.** Restrictions on production and imports of sugar create artificial shortages and prevent us from being able to meet demand for our products. Import tariffs on raw materials should not undermine our competitiveness on domestic and world markets. Diversity of supply sources should be facilitated as it is the basis for our food security.



**Ensure workable rules of origin.** Preferential Rules of Origin on CAOBISCO products need to be changed so that exporters - and the European economy - can benefit from preferential trade agreements. At present, a requirement that at least 40% of the weight of a product be comprised of European-origin sugar prevents the export of products in which the vast majority of added value is European. The burden of proof is rarely economically viable. The EU should take inspiration from the UK or Swiss value based rules of origin. Creativity and value-added production should be far more important than the origin of a single ingredient.



**Together we can further strengthen the European economy.**



## Achieve sustainable supply chains

### Best practices for a more resilient Europe

For many years, our members have been at the forefront of sustainability-related initiatives at national and European levels. As an association representing many family-run companies that have been active in Europe for generations, we understand that sustainability is about thinking long-term. We are proud of Europe's leadership in this area and of the EU's focus on upholding environmental protection and human rights. **We believe the EU should:**



**Make its laws clearer and more user-friendly.** We fully support the objectives of new rules on deforestation, due diligence, and protection of environmental and labour rights. The challenge however, is the complexity and risk of inconsistent implementation. We and our members are happy to provide expertise and assistance in developing better methods for achieving sustainability in value chains. Clear guidance, communication and industry consultation on implementation are essential.



**Support development and access to relevant data.** A lot of data is needed to assess and report on environmental and human rights impacts in our supply chains. This is a major challenge, especially for SME's. The EU should provide companies with relevant data as it already does in some sectors, to help with due diligence obligations and go the extra mile in building a sustainable economy.



**Reduce bureaucracy.** Many EU legislative acts are characterised by excessive bureaucracy and duplicate reporting, especially for SMEs. This should be reduced and the principle of "one in one out" should be considered. A harmonised and common reporting system should be implemented.

**Promote good partnerships with third countries.** It is important that we strive for a globally harmonised approach that production countries can comply with and consistency in other consumer markets. We call on the European Commission to continue and step up its outreach efforts.



**Coherence, reliable data and collaboration are vital for continued improvement in sustainability.**



## Nurture trust, transparency, science-based approaches and good governance

*Responsible dialogue between policy-makers and stakeholders results in sound regulations*

The confectionery industry supports evidence-based policymaking. The best policy and regulations are based on facts, clear objectives, scientific testing, stakeholder consultation, sound impact assessments and appreciation of practical realities. Bias and politicisation are to be avoided. **The EU should:**



**Encourage mutual respect and understanding between political, scientific, civil society and business communities.**

Listening to all stakeholder views and assessing the facts is essential. We all share the objective of ensuring that European products are safe and sustainably produced to high standards.

**Engage in more transparent, bottom-up policymaking.**

Stakeholders should be involved, in the process from its earliest stages. They should be heard and understood. This helps to build trust, mutual appreciation of desired outcomes and constraints, practical solutions and ultimately the effective implementation of well-conceived policies.



**Move towards sound risk management.**

Excessive precaution can result in unwarranted disruption and costs. Sound science entails calculated risk.



**Promote healthy lifestyles and balanced diets.** The special nature of chocolate, biscuits and confectionery products should be duly taken into consideration in EU policy discussion, as these products are primarily intended as treats. As such, it is important to understand the role that they play in consumers' everyday lives: while staple foods are more for nutrition purposes, treats are fundamentally about bringing pleasure and enjoyment to people, giving them small moments of indulgence. Responsible production goes with mindful consumption. Our products should not be discriminated against.



**Uphold the smooth functioning of the single market.**

A single, clear set of rules for all provides a level playing field and certainty. This is particularly important for SME's operating across borders – which is the case for most of our member companies.

**Working to keep small pleasures in life safe and delicious.**