



European Commission  
DG Agriculture and Rural Development  
Deputy Director General Lars Hoelgaard  
130, Rue de la Loi  
B – 1049 Brussels  
BELGIUM

23 March, 2009

**Subject: Commission proposal on the marketing standards for poultry meat, COM (2008) 336 final**

Dear Mr Hoelgaard,

Finnish Food and Drink Industries' Federation and Finnish Poultry Processing Industries' Association have examined the Commission proposal to change the definition of marketing standards for poultry meat. While understanding the basic reasoning given for the proposal, we still have some points of great concern which we would like to draw your attention to.

Transition time of 18 months needed

Firstly, we are very concerned about the date from which the new legislation shall be applied.

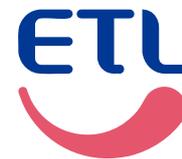
The poultry meat is sold to almost 70 % as fresh poultry meat preparations in the Finnish retail market. As the poultry meat production is at the moment constant throughout the year, freezing is used to manage the seasonal peaks and lows in demand. Neither cooked meat nor frozen meat products have traditionally been very popular among Finnish customers, and the market for these types of products is currently very small in Finland.

The Finnish poultry chain is totally vertically integrated from the very beginning of breeding broiler flocks up to the production of end products. To guarantee constant and effective production, the processing industry has made long-term contracts with the primary production.

The new poultry meat standards mean that the industry will have to change the production and slaughtering rhythm to better meet the seasonal demand pattern. To be able to adapt to the new situation in an orderly manner, we are asking the Commission for a transition time of 18 months. This time is needed for renegotiating the long-term contracts with the primary production as well for product development. In addition, due to the economic recession the meat stocks are relatively high at the moment, which makes the starting point for changes even more challenging.

Harmonized implementation of the poultry meat definitions in the EU to be secured

Secondly, there has been some confusion in the general discussion on the exact interpretation of the new standards. We have understood that the proposal does not prevent industry from using frozen poultry meat to produce cooked poultry meat products, and we would



appreciate if the Commission would confirm this. We are also interested in the ways the Commission is planning to ensure the harmonized implementation of the new standards in the EU.

The Community market is very diverse in terms of production structure and customer preferences. In order not to incur unnecessary damages and expenses to the meat industry in troubled times of economic recession, we hope the Commission will consider our request on the time of application of the regulation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Heikki Juutinen', written in a cursive style.

Heikki Juutinen

Director General  
Finnish Food and Drink Industries' Federation

Marika Säynevirta  
Secretary General  
Finnish Poultry Processing Industries' Federation