



The Vital Link in the Food Chain

Brussels, 29 July 2026

EU Code of Conduct on responsible food business and marketing practices

Primary Food Processors' (PFP) annual report 2026

1. General information

Name in full + acronym	Primary Food Processors (PFP)
Contact person with contact details	Christophe Lescroart, PFP President info@pfp-eu.org
N° in the transparency register*	71338036982-24
Date of signature of the Code	20 December 2021
Step of the food chain represented (ex: primary production, production, processing, trade, retail, ...)	Primary processors of agricultural raw materials
Who do you represent? (e.g. number of members, companies, SMEs)	European Associations representing six different processing sectors (CEFS, ECA, EFM, EUVEPRO, FEDIOL, StarchEurope) and including over 4.000 companies

* if available

European Associations pledge to:

2. *endorse the aspirational objectives set out in this Code (where applicable)*

- ✓ Primary Food Processors (PFP) endorsed the aspirational objectives set out in the Code of Conduct on Responsible Business and Marketing Practices relevant for their activities and set up actions that drive particular attention of members towards certain aspects of the Code. In particular, the following specific objectives of the Code are relevant to the PFP membership:
 - **Aspirational objective 3** - *A climate neutral food chain in Europe by 2050.*
 - **Aspirational objective 4** - *An optimised circular and resource-efficient food chain in Europe.* Aspirational target a) Improved resource-efficiency within own operations, contributing to sustainable, efficient use and management of energy and natural resources in operations by 2030.

- **Aspirational objective 5** - *Sustained, inclusive and sustainable economic growth, employment and decent work for all* with a particular focus on aspirational target a) improving business resilience and competitiveness.

3. *promote and disseminate this Code with(in) their constituency/ies;*

- ✓ Over 2025/2026, PFP used the News Brief and meetings by its environment team and with energy experts to share information about the Code of Conduct and share related topics and actions with the PFP membership.

4. *encourage their members to align their sustainability actions and/or business practices to the aspirational objectives and targets of the Code and invite them, on a voluntary basis, to adhere to this Code, as appropriate;*

- ✓ The competitiveness & energy expert group set up in 2025 continued to identify and support the needs of PFP member companies as they set up decarbonisation pathways, overcome impediments, make appropriate investments and achieve decarbonisation. Sharing intelligence, experience and learn from other initiatives proved beneficial and helped formulating collective decarbonisation needs to accelerate the process for scope 1 and 2.
- ✓ PFP undertook preparations to hold a workshop on "*Incentives to climate change mitigation across the agri-food value chain*". However, since the publication of the report commissioned by DG CLIMA and to be delivered by *Trinomics, IEEP, Ricardo plc, and Wageningen University & Research* was delayed, the PFP event has been postponed.
- ✓ Another planned PFP workshop could finally be held in April 2026. The aim was to gather practical and technical insights from companies dealing with the EU ETS on the ground and to support the broader ETS revision. The workshop allowed company representatives from the different sectors to share understanding and possible best practices, by digging into the future of free allocations, benchmark methodology, the carbon leakage list and conditionality rules. In this context, discussions focussed on the actual technological availability in relation to the specific operational realities of the PFP sector for industries that rely on heat & electricity. The discussions raised the problems of viable low-carbon alternatives and the need for incentivising realistic investments. Participants also shared expertise on and acknowledged the relevance of the Carbon Removal Certification Framework (CRCF) while noting that practical implementation remains in its early stages. It was emphasised that the framework should remain pragmatic, workable and coherent with ETS developments, corporate accounting systems and voluntary carbon markets.

5. *continue to engage in dialogue with other food chain/systems actors and EU and international policymakers to forge (new) relationships, exchange good practices and discuss challenges encountered, learn from each other (studies, projects) and create better mutual understanding, and identify opportunities for collaboration and potential partnership.*

- ✓ On 8 September 2025, PFP held a workshop on all the aspects of the revised Industrial Emissions Directive or "IED 2.0" and to what extent amendments to the Directive will impact

BREF guidance. It provided company managers responsible for implementation the opportunity to understand the implications and anticipate possible impacts.

- ✓ PFP and its members are involved in food, feed and bioeconomy supply chain alliances and coalitions. They allow to explore joint work and give rise to joint policy approaches.
- ✓ As member of the European Food Forum, the participation in workshops, roundtables and dialogues helps shaping a vision on the challenges encountered by other chain players and a better understanding on possible joint approaches.
- ✓ As member of the Industrial Emissions Alliance meeting every two months, the PFP representatives make use of this network where experiences and knowledge learned during BREF making processes are shared to inform the PFP membership. The relevant issues of common interests, identified on an ad-hoc basis, may give rise to collaborative work and adoption of joint statements or policy recommendations, based on the adoption of the primary legislation and secondary legislative acts or from their implementation.

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