

Competition & Consumer Policy Section  
Department of Business, Enterprise and Innovation,  
1 Earlsfort Centre,  
Lower Hatch Street,  
Dublin 2

22 May 2018

Ref: EU Directive on UTP's in the Food Supply Chain

Dear Mr. Grace,

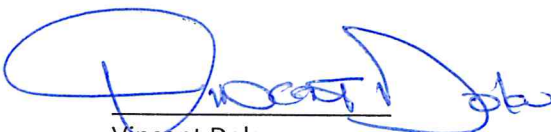
Thank you for your letter marked for the attention of our Chief Executive, Mr. Rory Byrne dated April 25<sup>th</sup>.

In Total Produce, we have been monitoring the progression of the EU Unfair Trading Practices Directive for some time. Given the international scope of the proposed legislation, our initial response was to engage with our peers from across the fresh produce industry under the auspices of Freshfel, the European Fresh Produce Association ([www.freshfel.org](http://www.freshfel.org)). We believe that legislation with implications for all participants across the fresh produce supply chain is best addressed by a collective response from the industry at large.

Having canvassed opinion from across a broad spectrum of its diverse membership, Freshfel is currently completing a position paper on behalf of the wider European fresh produce industry which they expect to submit directly to the EU in the coming weeks. We anticipate that this paper will reflect not only Total Produce's position but also the interests of our network of growers across Ireland on whom we rely for local produce.

Given our active and ongoing participation in this process, we believe it would be inappropriate for us to submit a separate position paper, independent of our industry peers, at this time. We are, nevertheless very grateful to have been afforded the opportunity to contribute to this consultation process here in our home market.

Yours Sincerely



Vincent Dolan  
European Marketing Director