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WHITE PAPER

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on short food supply
chains with a focus on
Spain

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On-Farm: Farming, Food Production and Food Processing with Added Value for Local
Small and Medium-Sized Farms

Short Food Supply Chains as Opportunity for Small and Family Farms?

Currently, large food supply chains manage the largest part of food sales. However, alternative systems of food production and distribution focus on locally produced and sold food that has gotten great attention in the last two decades, the short food supply chains (SFSCs). SFSCs do not have a single definition. Short supply chains are defined by the number of actors implied in the food chain rather than food miles. One definition given by the European Commission is “A supply chain involving a limited number of economic operators, committed to cooperation, local economic development, and close geographical and social relations between producers, processors and consumers”. The oldest system is still represented by local or proximity markets, but other means are also used such as direct sales stores, on-farm sales, consumer cooperatives, home deliveries, online sales. Platforms or websites are today the main response of the agricultural sector and food industries, generally of local nature and with artisanal productions, to bring their offer closer to consumers.

The challenges of those new systems represent tough market competitions, high distribution and logistics costs, small shipment sizes and so forth. Hence, the SFSCs requires corresponding solutions in food distribution that are aligned with the contemporary logistics trends, sustainability and aspects of the new digital era. Moreover, small and medium-sized farms depend on value creation on their farm and cannot benefit from economies of scale to the same extent as large farms.

The aim, its purpose and structure of the white paper

A white paper is a report and guide that informs readers concisely about short food supply chains as a complex issue and presents the On Farm’s philosophy on the matter. It combines expert knowledge and research into a document that argues for specific solutions or recommendations. The white paper allows the reader to understand the issue, to solve a problem and to make a decision.

The main objectives of this white paper are to analyze the actual situation of short food supply chains and farm-to-fork production strategies in agriculture in the partner countries. A particular focus is on the respective legislation, government regulations and government support for producers. The

ONFARM “Farming, food production and food processing with added value for local small and medium-sized farmers” is an Erasmus+ project that aims to train farmers with skills and competences to start on-farm production processes, reach wider customer audience and create added value to their products. The project wants to support the development of short food supply chains and bring forward the European Farm to Fork Strategy, presented by the European Commission in 2020 as part of the EU Green Deal.

The project (2021-2023) is coordinated by the Association of Private farming of Czech Republic (ASZ) and implemented together with five partners: The European Council of Young Farmers (CEJA) based in Belgium, Confederazione Italiana Agricoltori Toscana (CIA) from Italy, Institut für Ländliche Strukturforschung from Germany (IfLS), On Projects Advising (OnP) from Spain, and Stichting Slow Food Youth Network (SFYN) from the Netherlands. In addition to this white paper, the partnership will develop case studies, a series of podcasts, and online training materials. These materials will be presented to farmers and relevant stakeholder in a series of events at European and national level. You can find all materials and further information at www.onfarm.eu

document will inform about current challenges and needs to support on-farm processing and farm-to-fork strategies in Europe. The primary target groups are farmers and agricultural food producers. In addition, the white paper also informs the broader public, relevant stakeholders and policy makers.

The white paper is structured as follows: First, relevant EU policies are introduced like the EU Green Deal, Farm-to-Fork Strategy and Common Agricultural Policy and the importance and relevance of these EU policies discussed. This is followed by the country-specific chapter on the establishment and situation of short food supply chains and their local regulations. Then, considerations regarding the implementation of Short Food Supply Chains as well as supporting activities for this will be shown/discussed. Finally, a conclusion and outlook on the further ONFARM project results/outcomes are given.

EU Strategies for Short Food Supply Chains

The EU agricultural sector

In Europe there were 10.5 million farms in 2016. The vast majority of these (95.2 %) are classified as family farms. According to COPA COGECA the average size of a farm is 16 ha in Europe. The agricultural land cover represents 48 % of EU territory and family farms represent 67 % of these. A professional family farm is considered between 5 to 250 ha. Half of the economic resources generated by farms in Europe come from crops, 40 % from livestock and the rest from secondary activities. Farm productivity is constantly increasing (+109.5 % from 2005 to 2017). The value produced by farms in 2017 is € 427 billion, making Europe the world's largest agricultural power. Agricultural imports and exports alone account for 1/3 of the EU's trade with the world.

The agricultural sector is facing a series of problems. Firstly, a demographic crisis with only 5.6 % of young farmers (under 35 years old) against 31 % over 65 years old. In addition, serious environmental challenges are affecting the sector and farmers need to adapt to climate change.

Short food supply chains, small & family farms and alternative food networks in the EU

There is an increasing role of the alternatives food network to respond to the market demand. However, even if it is a growing system it remains marginal. On average, about 15 % of EU farms sell more than half of their production directly to consumers. However, these are mainly small farms, with only 3 % of the farms above 100 ESU selling more than half of their production directly to consumers (Short food supply chains and local food systems in the EU briefing of the Parliamentary Research Service). There is also great difference depending on the country. It is important to stress that short supply chain is not only present in rural area. Alternative food networks are also taking place in urban area with urban food production. Initiatives such as community gardens or rooftop production are also considered as short supply chain for urban area. The short supply chains are responding to the need of consumers to reconnect with their food. Food coming from these alternative systems is considered fresher, healthier, and more sustainable. Nevertheless, these common beliefs need to be taken with caution, as there is an academic debate to state what model is the most sustainable. Sustainability is context-specific and short supply chains can be the most sustainable system in some cases.

What are the current European policies in agriculture and how do they support short food supply chains, small & family farms and alternative food networks?

There is no policy, which specifically supports short supply chains. The policy, which shapes the rules of food production, is the Common Agricultural Policy (CAP). However, some measures of the CAP are considered discriminatory to small farmers and family farms, especially the hectare-based payments that supports the largest farmers. Nevertheless, with the new CAP (2023/2027) and the Farm to Fork Strategy, it seems like the Commission is trying to provide a toolbox that every farmer can benefit from. The Farm to Fork Strategy is the first attempt of the European Commission to look at the production at the food chain level (for more details check the zoom-in box below). Within this new CAP there are clear objectives in the regulation to strengthen small farmers production and short supply chains. To make direct payments fairer, the Commission has adopted redistribution schemes from large to small farmers. With the National Strategic Plans, currently under assessment, the Commission provides tools that State Members should use to meet the specific needs of their farmers.

On top of the direct payments, there are other concrete measures, which aim to support small and local markets under the second pillar of the CAP.

1. **Advisory services:** to support farmers in developing short supply chains;
2. **Operational groups:** to allow the sharing of good practices. One group has been dedicated to short supply chain at EU level, but there is the possibility to develop them at national, regional, local level;
3. Possibility for farmers to enter **quality schemes:** to support to farmers with their administrative procedure to access quality chains (e.g., label of origin);
4. **Support to cooperation:** this measure facilitates horizontal and vertical cooperation among supply chain actors and local markets;
5. **Investment funds:** via the second pillar there are targeted funds for farmers to transform the products on farm and sell at the local level. It is on farm transformation subvention.

Zoom-in: How the Farm to Fork Strategy can support short food supply chains and alternative food networks?

In the European Commission's Communication (May 2020) "A **Farm to Fork Strategy** for a fair, healthy and environmentally-friendly food system", at the heart of the European Green Deal, the European Commission mentions the need to enhance the resilience of local food systems and create shorter food supply chains.

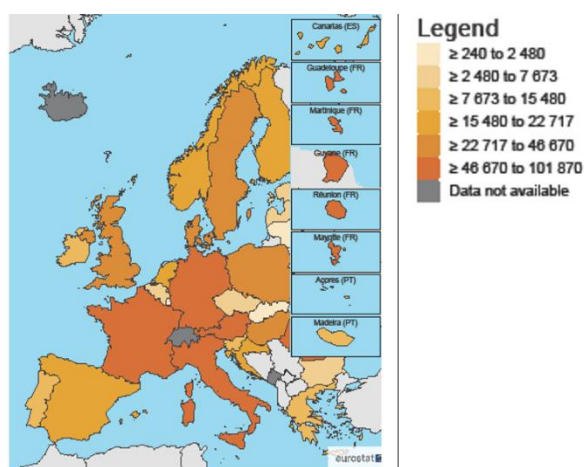
By end of December 2023, the European Commission will present to the European Parliament and to the European Council 'The future framework law on sustainable food systems' - the horizontal initiative of the Farm to Fork. The aim of this new framework is to allow all the actors of the food chain to come together and contribute to the food system in a sustainable way, considering the social, economic, and environmental aspect of sustainability. The Commission aims to strengthen the local initiatives and have more of a bottom-up approach. The European Commission is exploring the possibility to strengthen **new mechanisms of food governance** at European, national, and local level. At the local level, they can take the shape of food councils gathering all actors of the food systems (including farmers, consumers), working together towards more sustainable food systems.

Moreover, the European Commission is revising the **procurement criteria for sourcing food in public spaces**, introducing more sustainable criteria. The legislative framework stemming from the Farm to Fork Strategy will incentivize sustainable public procurement and indirectly sourcing of food from short food supply. For the moment, these measures are voluntary but making them mandatory would strengthen short supply chains without distorting the common market. It is now up to the Member States to implement these measures.

Short Food Supply Chains in Spain

Market Share

It is very difficult to obtain statistical information that allows us to know the situation and evolution of the short agro-food marketing channels in Spain due to the large number of marketing systems that could be included in the definition. However, to study the market we can approach it from the agrarian side, in which we can see how many farms participate in these short supply markets; or from the consumption side, in which agents sometimes not strictly agrarian can be included, as it may include some type of transformation.



From an agrarian perspective, in 2013 according to EUROSTAT (see figure 1), 15.818 holdings performed other gainful activities directly related to them, which in Spain represents 1,6 % of the total. This would also include other types of activities not related to direct sales.

Moving down the focus, in 2016, 3.332 of these holdings (0,35 % of the total) performed some type of on-farm processing. Many of these processed products may be destined for the direct sales market. And even more, in 2007, the last year with available data, 1.448 holdings (0,14 % of the total)

sold directly more than 50 % of their production.

From the perspective of consumption, up to almost 4 % of households bought products at some point directly from the producer in 2018, according to the Ministry of Agriculture. The volume of products purchased, which reaches 0,35 % of the total, can be very different depending on the type of product. Products such as honey (8 %), eggs (2 %), certain types of meat such as lamb or goat (2 %), certain sausages such as Iberian ham (10 %), certain types of cheeses and oils (2 %) or some vegetables and fruits such as oranges (1 %) or some types of wines and nuts (1 %) stand out. Overall, these purchases accounted for 0.3 % of the total volume purchased, for slightly more than 0.35 % of the total value of the shopping basket. Within the short channels, we should also include part of the purchases of other forms of consumption such as those shown in the table 1.

Table 1: Volume of purchases concerning the total. Food consumption panel (Ministry of Agriculture 2018)

Coop consumer	Home deliveries	Local markets	Direct from the producer	Internet
0,28%	0,59%	0,90%	0,35%	1,25%

Moreover, data indicates that short commercialization chains have an important presence in the acquisition of ecological foods (EcoLOGICAL 2019). According to the study carried out by the Ministry of Agriculture and Fisheries, Food and Environment in 2017, half of the Spanish consumers of ecological foods obtain them through channels in which the majority of the offered products are ecological. According to the mentioned study, 29 % of ecological foods buyers purchase these foods exclusively in specialized channels. The most common ones are direct selling, specialized shops,

herbalist shops, small shops or specialized traditional market stalls (MAPAMA; Escobar-López et al. 2021).

Where are major markets

The degree of development of short food supply chains in Spain varies greatly depending on the geographical area. In the Basque Country, for example, there is greater implantation than in other regions, possibly due to its condition as a diversified production area and at the same time densely populated, although it may also be influenced by higher consumer awareness, as is observed in other European countries. There is no doubt that progressive depopulation of a large part of the territory, only 15 % of the population lives in rural areas, and the continuous growth of urban areas displaces to these areas the greatest interest and growth of this type of consumption. It is mainly in rural areas where there is a higher rate of self-consumption, which reaches up to 2 % of the volume of consumption.

Examples of forms of short supply models:

- Open-air markets, run by farmers' groups or local vendors, sometimes specializing in organic food or other products.
- Annual events, such as local food festivals.
- On-farm shops or outlets, either with products from a single farm or several farms.
- Cooperative shops, run by a group of farmers, with a wide range of products.
- Home delivery systems of baskets or boxes, managed by a single producer or with products from different farms. Consumers receive regular supplies of locally produced and seasonal food
- Specialized retailers selling in most cases directly to consumers.
- Organized groups offering catering services.
- Community Supported Agriculture (CSA), where consumers share the risks and benefits inherent in production.
- Public procurement, so that schools and other institutions can buy local food supplies.

Support for Short Food Supply Chains in Spain

Relevant regulations

The most relevant regulations are those included in the so-called "hygiene package". Nevertheless, Community legislation exempts direct sales from their scope of application direct supply by producers of small quantities of primary products to the final consumer, provided that the Member States regulate it, allowing this type of activity and guaranteeing that the Community objectives in this matter are achieved. A table in the appendix provides a summary of the main legislation affecting short agri-food marketing channels. Most of it refers to the hygiene package, so apart from the European legislation, regulations describing the system for granting exemptions (mainly national in terms of simplification), are detailed below.

Relevant funding schemes

In addition to the direct payment schemes defined in Regulation (EU) No. 1307/2013, certain aid for producer organizations of Regulation 1308/2013, only the Rural Development Regulation 1305 allows the possibility of payments for the establishment of short channels.

In Spain, only Castilla la Mancha has promoted direct aid exclusively to the creation of short channels as such, specifically through the measure of Horizontal and Vertical Cooperation of Article 35 of Regulation (EU) No 1305/2013.

Beyond that, cooperatives, farms and industries have been able to receive aid for investment in physical assets in their own facilities through means defined in Articles 17 and 19 of Regulation 1305/2013), aid for the establishment of quality schemes (Article 16 of Regulation 1305/2013).

There are also other financing systems, more local, as in Navarra, for example, where administrations have created Ekoalde (Ekoalde 2022), a center for the collection and logistics of organic production in Navarra. This initiative arises as a key piece for organic production to reach in a combined, joint and professional way to short marketing channels at improve selling prices. The infrastructure is located in Noáin.

For the new CAP, Regulation 2021/2115 establishes payments or support with regard to investments; setting-up of young farmers and new farmers and rural business start-up; and cooperation. The implementation of this regulation is described in the new strategic plan, which establishes an indicator called better organization of the supply chain, and a target of 779.362 farms over 2023-2029 participating in one of these initiatives: producer groups, producer organizations, local markets, short supply chain circuits and quality systems supported by the CAP.

What are available support services?

In general, these initiatives have received little support in terms of advice and subsidies. As mentioned before, the main support is in the production phase, especially organic farming, and mainly advised by Farmers' Organizations. There are no advisory services for marketing, and other types of support such as logistics (e.g. through the provision of premises), the creation of farmers' markets, or the establishment of identification seals, usually depend on local or regional governments.

Municipalities or regions sometimes provide premises to manage sales, or land for agro-ecological cultivation initiatives. They also promote producers' markets

Considerations regarding the implementation of Short Food Supply Chains

Based on previous studies¹, the following challenges and opportunities could be highlighted.

Opportunities

- On the demand side, the growing interest of the population in consuming more natural, ecological, and environmentally friendly products, brings them closer to these consumption models (IMIDRA 2018).
- On the supply side, the existence of clear asymmetries in bargaining power within the agri-food chain makes farmers also want to change their way of selling, which leaves them so little profit (Ley 2013).
- The development of more supermarkets/shops that focus on local and sustainable products. They facilitate logistics and allow for easier scheduling.
- Selling through the internet, although it is more difficult to manage and not as easy for all products.

Needs for action

- Combat intrusion in producers' markets, understanding as such those where, strictly speaking, all sellers are producers.
- Street markets: Displaying local products / local production in contrast to agricultural products from wholesale
- Encourage the establishment of networks of producers and consumers that guarantee sufficient marketed production to make logistical operations profitable.
- Facilitate the consumer to pick up their orders facilitating the establishment of delivery points in urban centers with long opening hours.
- Promote research in micro-logistics adapted to the characteristics of this market.
- Work on the presence in social networks, which are an inexpensive and not excessively complicated tool for non-experts.
- Improvement of websites or applications adapted to mobile devices.
- Improve knowledge and dissemination among consumers, to build and consolidate a "local" culture, which is still incipient in Spain but is already a fact in other countries.
- Study for each particular situation and case the different options and formulas already used successfully, taking great care to ensure that the solutions implemented do not create new barriers for operators and guaranteeing consumers' right to information.
- Design and implement some type of statistical operation or registry, or take advantage of existing ones, to improve knowledge of this type of channels and enable monitoring of their evolution and evaluation of the measures implemented.

¹ i.e. Ministerio de Agricultura y Pesca, Alimentación y Medio Ambiente (MAPAMA). Short agri-food marketing channels. Available online: https://www.mapa.gob.es/es/alimentacion/temas/observatorio-cadena/estudioccc_tcm7-272187_tcm30-128590.pdf or Escobar-López, S. Y., Amaya-Corchuelo, S., & Espinoza-Ortega, A. (2021). Alternative Food Networks: Perceptions in Short Food Supply Chains in Spain. *Sustainability*, 13(5), 2578.

Recommendations for farmers obtained in the interviews carried out in the project

Do	Do not
Always make a plan	Take public support for granted
Check the marketing plan with an expert	Never get over indebted
Take always small steps	Say always yes
Use the social media you can manage	Expect people to come and buy for themselves, they will need "help"
Be polite, even others are not	Forget paperwork (taxes, regulations)
Look for networks and synergies	Get discouraged soon
Know your costs	Focus only in the production
Know the limits of the project	Underestimate marketing importance
Be very persistent	

The OnFarm expert interview on the implementation of Short Food Supply Chains

OnFarm: *"How can farmers proceed [from the legal frameworks like the Farm to Fork strategies] implementing Short Food Supply Chains?"*

Patrick Burgess: *"There is no general framework for this, and it depends largely on the situation, for example, farmer size, resources, time, market opportunity. The concept of "short food supply chain" also plays an important role: are we trying to create a more face-to-face construct with a direct interaction between a producer and consumer, or an extended situation where we try to provide embedded information about the origin, like a labelling scheme?"*

To proceed in a strategy, I would say two things are needed, first is a self-assessment of the company's/farms capabilities, products and service offerings. And a decision on what amount of products should be sold in the short food supply chain format.

Afterwards, a framework might be beneficial to the farmer, in seeing the steps to converting, and this could be generalised, or specific to the self-assessment. The framework should also include decision tools on which market to access at a local level and be specific to the supply chain structure that the producer would like to go for.

In addition to the two steps, a network might be formulated to support the transition. This would be a network of stakeholders, let's say both industry partners, other farmers and intermediary companies that are involved directly in the supply chain, and also technical or knowledge partners ranging from banks to universities. Lastly, it depends on the farmer. There has to be a drive for change, and if it is not there, regardless of motive, it will be difficult. "

Caio Dorigon: *"Farmers need support from the government to open new short food supply chains and to build a closer relationship with consumers. They need capacity building and incentives on these matters. Chefs could be a bridge to promote their products and consumers need to be educated about the importance of local consumption and the valorization of local products."*

Valentino Affinita: *"Farms should adopt an agroecological approach, through a transition that transforms the role of agriculture in society. Moving from industrial agriculture to an agroecological approach implies the effort to reform the food system as a whole: it means discouraging production based on monocultures and supporting family farming that reduces external inputs, respects seasonality, regenerates the soil, respects social rights and addresses the local market. This goal is achieved in the first place by moving public funds - for example those of the CAP - from the agro-industrial system to small and medium-scale production and by implementing forms of multifunctionality, both of an economic and social nature, in particular in urban and peri-urban contexts. For this, the goodwill of individual farmers is not enough, but a systemic process is needed that includes the training, support and empowerment of small farmers and young people who choose to undertake this work."*

OnFarm: “What are supporting activities and the role of regional collaborations or alternative food networks?”

Patrick Burgess: *“I think the examples given are very critical, as long as the networks are diverse in the supply chain, the network should consist also of potential market partners to increase sales at a local and regional level. There is also a role of the government to provide funding and initial support to the network in the start-up phase. You may also see that many of the short food supply chains are becoming less about face-to-face, so online digital platforms are increasingly popular, and this might be important for the success of these initiatives. There should also be a trust mechanism, whether this is a label or a technology, it is important to support trust in the farmer.”*

Caio Dorigon: *“Capacity building to local producers and consumers about alternative food networks, as well as giving support to the local producers to individuate new local consumption channels and on how to open them. It’s also important to educate consumers and promote the local products, their importance, how they can be used at home and so on.”*

Vallentino Affinita: *“In an increasingly urbanized context in which food systems are unable to sustainably meet the growing demand for food in cities, it has become necessary to direct food and agricultural models towards a new paradigm. The role of public administrations is an important key to foster virtuous dynamics: from school canteens to hospital canteens, from local markets to food poverty support programs, from the fight against waste to the allocation of public land to young farmers, local authorities they can give a direction of sustainability to the production and distribution of food. Relocalization of food systems must be a priority for administrations at all levels, starting with those closest to the territory. Local authorities must equip themselves from today to face the influx of new mouths to feed and must do so with a sustainable food policy, which connects the city with its countryside and its farmers. An operation that must be built starting from the territory with its specific characteristics, in which very different combinations can be found between natural cycles and anthropic activities.*

For this reason, it is necessary to implement actions aimed at strengthening and supporting the small and medium-sized enterprises that populate the primary sector along all the steps of the supply chain, from production to marketing, up to the post-consumer phases. To ensure a healthy diet and access to quality food for all citizens, while taking care, at the same time, of the protection of natural resources, it is in fact necessary to support and enhance the good practices of the food supply chains, having in mind to strengthen the economic and social links with rural areas close to the metropolis. Young people looking for an outlet in agriculture must be guaranteed a whole series of additional support tools: technical advice, easier access to the means of production, training in agroecology.

From this point of view, it is necessary to innovate training in agriculture, a fundamental tool for expanding the number of people who can contribute to turnover in the sector. To technical teaching, it becomes urgent to approach paths marked by a non-sectoral but systemic approach. Not just future farmers need training in agroecology. Those who work in the media system or in national and local institutions should have access to dedicated paths, to update their knowledge and use their skills at the service of ecological transition. It is extremely important that these key sectors of the social body fully understand the causes and consequences of the ecological crisis, in order to activate information flows aimed at the general public or regulatory projects capable of reversing the trend.”

Valentino Affinita is a campaign manager at Terra!, an Italian environmental association.

Patrick Burgess, is a lecturer on Food Supply Chain Management and Logistics at the Aeres University of Applied Sciences in Almere, The Netherlands.

Caio Dorigon is the coordinator of the Latin America and the Caribbean network and project manager at Slow Food International in Bra, Italy.

Conclusion

The agricultural sector but especially small and family farms are under pressure. Market forces and environmental challenges on the one hand and changing social expectations towards the agricultural sector bring short food supply chains into the center of sustainable food production and consumption. This development is supported by a wide range of strategies and funding schemes. However, on the national level more communication and collaboration among ministries is needed, and a uniform approach is desirable. Likewise, better overall experience sharing and networking can be helpful. Better statistical coverage is also important, especially for better planning in consulting practice (Krauch 2022).

Nevertheless, farmers are in a unique situation with an increasing number of funding opportunities, changing consumer habits and the internet provides access to information and inspiration. The first step for a farmer is a thorough analysis of the farm's potential role in a short food supply chain. The second step is to develop a realistic farm and business concept. Using the existing support structures and online information materials can be helpful to develop an innovative approach. The third step is the implementation of the new approach. The goal of short food supply chains is to make food production more resilient. This benefits the farmer as well as customers and contributes to the sustainability of the farming sector.

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Appendix

Main Legislation

Level		Scope
European	Committee of the Regions opinion 2011/C 104/01 Regions	Local food systems
European	Council Regulation (EC) No 834/2007 and Commission Regulation (EC) No 889/2008	organic production and labeling of organic products
European	Directive 2011/83/EU of the European Parliament and of the Council	consumer rights
European	Regulation (EC) No. 1169/2011 of the European Parliament and of the Council	provision of food information to consumers,
European	Regulation (EC) No. 178/2002 of the European Parliament and of the Council	Food safety
European	Regulation (EC) No. 852/2004 of the European Parliament and of the Council	hygiene of foodstuffs.
European	Regulation (EC) No 853/2004 of the European Parliament and of the Council	specific hygiene rules for food of animal origin
European	Regulation (EC) No. 854/2004 of the European Parliament and of the Council	official controls on products of animal origin intended for human consumption.
European	Regulation (EU) 2018/848 of the European Parliament and of the Council	organic production and labeling of organic products
National	Royal Decree 9/2015	hygiene of foodstuffs
	Royal Decree 191/2011	excludes from the obligation to Register of Food and Food Businesses, establishments and their proprietary companies in the event that they exclusively handle, transform, package, store or serve food for sale or delivery on site to the final consumer".
National	Royal Decree 9/2015	conditions for the application of European regulations on hygiene in agricultural primary production.
National	Royal Decree 126/2015	general rule on food information on foodstuffs

Level		Scope
		presented unpackaged for sale to the final consumer and to collectivities, those packaged in places of sale at the request of the purchaser, and those packaged by retail trade holders.
National	Royal Decree 1086/2020	regulates and relaxes certain conditions for the application of European Union provisions on hygiene in the production and marketing of foodstuffs and regulating activities excluded from its scope of application, especially for the direct marketing of small quantities.
National	Law 12/2013	measures to improve the functioning of the food chain.
Regional	i.e Andalusian Decree 163/2016	regulates the administrative regime and the information system for the direct sale of primary products from agricultural and forestry holdings to final consumers and retail establishments.

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