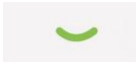


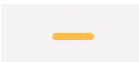

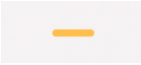


EEB assessment of the EU Farm to Fork Strategy



Area of focus	The Commission's commitments	The EEB's comment	Rating
<p>A clear direction for the transformation of the food system</p>	<p>"The EU's goals are to reduce the environmental and climate footprint of the EU food system" and to ensure "that food production, transport, distribution, marketing and consumption have a neutral or positive environmental impact"</p> <p>Proposals for a "legislative framework for sustainable food systems" by 2023, in order to ensure policy coherence, mainstream sustainability in all food-related policies, and strengthen the resilience of food systems</p>	<p>Ambitious language is welcome, but the lack of measurable and binding targets on many dimensions of the environmental and climate impacts of our food system (see our Farm to Fork position paper) makes this little more than a good intention.</p> <p>However, the commitment to propose a new legislative framework for a sustainable food system could be a game-changer.</p>	
<p>Transition to agroecology for resilient farming</p>	<p>Agroecology is seen as one of several approaches to sustainable farming, but not recognised more prominently as the new paradigm for EU agriculture.</p> <p>The Commission states that "the COVID-19 pandemic brings to the fore the importance of a robust and resilient food system", however this analysis focuses on food availability and the ability of supply chains to keep functioning in times of crisis.</p>	<p>It is truly regrettable that the Strategy does not set a clear direction for EU agriculture towards agroecology, as demanded by the EEB and large parts of EU civil society.</p> <p>The Commission's diagnosis of food system resilience fails to recognise structural weaknesses of EU agriculture such as chronic overproduction in the livestock sector or dependence on migrant labour in the fruit and veg sectors due to overspecialisation. As a consequence, no actions are proposed to enhance the resilience of EU agriculture through a restructuring of the sector towards agroecology and diversified farming, despite strong calls from civil society to do so.</p>	

<p>Circular nutrients management</p>	<p>“The Commission will develop with Member States an integrated nutrient management action plan to address nutrient pollution at source and increase the sustainability of the livestock sector.”</p> <p>On the two main sources of nutrients inputs to the EU environment, fertilisers and livestock feed, the Commission will:</p> <p>“Act to reduce nutrient losses by at least 50%”. “This will reduce the use of fertilisers by at least 20% by 2030”</p> <p>“Examine EU rules to reduce the dependency on critical feed materials (e.g. soy grown on deforested land) by fostering EU-grown plant proteins”</p>	<p>The Integrated Nutrient Management Action Plan is welcome, and the concrete targets for reducing nutrients pollution and fertiliser use and the commitment to reduce dependency on feed imports are steps in the right direction.</p> <p>However, the ambition is not proportional to the scale of nutrients pollution in the EU. To achieve truly circular nutrients management and end pollution, all new inputs of nutrients must be drastically reduced and nutrients in the system must be better recycled. This means phasing out synthetic fertilisers and livestock feed imports, and halving food waste across the whole supply chain, areas where the Strategy is rather weak.</p>	
<p>Sustainable fisheries and aquaculture</p>	<p>“The Commission will step up efforts to bring fish stocks to sustainable levels via the Common Fisheries Policy (CFP)”, strengthen fisheries management in the Mediterranean and reassess climate change related risks.</p> <p>Revision of EU fisheries control system and mandatory use of digital catch certificates.</p> <p>EU guidelines on sustainable aquaculture.</p>	<p>The commitments made in relation to fisheries and aquaculture are very limited and not in line with the level of ambition displayed in the Biodiversity Strategy.</p> <p>We miss:</p> <ul style="list-style-type: none"> • A reference to the 2020 deadline of the CFP (which has not been achieved). • Commitment to end destructive impacts of certain fisheries and aquaculture practices on marine ecosystems and on their resilience to the impacts of climate change. • Commitment and planned actions to support transition of the industry to low-impact fisheries, including by banning destructive fishing practices, non-selective fishing gear, and bycatch of sensitive species. • Commitment and planned actions to support the transition to an environmentally responsible and low impact aquaculture production. • A clear commitment to ban harmful fisheries subsidies in the next EMFF and at WTO. 	

		<p>The pressure to ensure sustainable fisheries and aquaculture will now be on the proposed legislative framework for a sustainable food system in 2023.</p> <p>The commitment to take action to reduce overall EU sales of antimicrobials for aquaculture by 50% by 2030 is positive.</p>	
<p>Healthy and sustainable food</p>	<p>“Current food consumption patterns are unsustainable from both health and environmental points of view”, with the EU needing to move “to a more plant-based diet with less red and processed meat”.</p> <p>Actions to make healthy and sustainable food the easy choice for consumers include proposals for harmonised nutrition and sustainability labelling, and “minimum mandatory criteria for sustainable food procurement”.</p>	<p>Despite recognising the unsustainability of current livestock production and consumption, action on this front is lacking. It is very regrettable that a clear commitment to “accompany the transformation to sustainable livestock systems” through the CAP, which was included in previous leaks, was removed at the last minute.</p> <p>Rather than taking strong action to transform food environments so healthy and sustainable food is the default, the Strategy sets out to “empower consumers” through better labelling. This ignores the primary responsibility of food businesses and public authorities to create healthy and sustainable food environments. However, the commitments on public procurement, also included in the Circular Economy Action Plan, are welcome.</p>	
<p>Green Deal-compatible EU trade</p>	<p>“Appropriate EU policies, including trade policy will be used to support and be part of the EU’s ecological transition. The EU will seek to ensure that there is an ambitious sustainability chapter in all EU bilateral trade agreements.”</p> <p>“To reduce the EU’s contribution to global deforestation, the Commission will present in 2021 a legislative proposal and other measures to avoid or minimise the placing of products associated with deforestation or forest degradation on the EU</p>	<p>The initiatives proposed are steps in the right direction, but are not followed up by strong enough commitments. It remains unclear what these initiatives will entail and which parts will be legislative and which voluntary.</p> <p>To make EU food systems “operate within planetary boundaries” the EU needs to integrate sustainability into trade policies in a binding manner. All agriculture products imported to the EU must be subject to EU Green Deal-compatibility criterias to safeguard the ambitions of the Deal and to level out the field for European farmers. The silence on carbon pricing similarly to the proposed Carbon Border Adjustment Mechanism in this</p>	

	<p>market”</p> <p>“As part of its approach to food information to consumers and combined with the legislative framework on sustainable food systems, the EU will promote schemes (including an EU sustainable food labelling framework) and lead the work on international sustainability standards and environmental footprint calculation methods in multilateral fora to promote a higher uptake of sustainability standards. ”</p>	<p>Strategy is disappointing.</p>	
<p>Solid implementation through CAP</p>	<p>“The Commission will support the introduction of a minimum ring-fencing budget for eco-schemes.”</p> <p>“The Commission will pay particular attention to addressing the Green Deal targets, and those stemming from this strategy and the Biodiversity Strategy for 2030. It will ask Member States to set explicit national values for those targets, taking into account their specific situation and the above mentioned recommendations.”</p>	<p>It is very disappointing to see that the Commission continues to hide behind its flawed CAP reform proposal. Instead of making believable commitments to tighten the climate and environmental dimensions or the performance framework, it is placing responsibility in the hands of Member States, who have spent the last 2 years dismantling the weak ‘Green Architecture’ of the CAP. The promise to “support the introduction of a minimum ring-fencing budget for eco-schemes” is tokenistic, as this decision currently lies in the hands of Member States and MEPs.</p> <p>The “obligation for Member States to take the Green Deal targets into account when drawing up their Strategic Plan” and to “set explicit national values for the targets set” in this Strategy which had been included in a leaked draft, has now disappeared, showing there is real cause for concern about exactly how much the CAP will do to achieve the new targets.</p>	