

A European Green Deal for the transition to sustainable food systems

EEB position paper on the “Farm to Fork” Strategy

The environmental challenges facing Europe and humankind – from climate and biodiversity breakdown to chemical pollution of every corner of the planet – are existential challenges. Our food system is a major driver of environmental degradation and resource depletion, but it is also threatened by climate change and biodiversity collapse. Only deep systemic change of our policies and attitudes can address these challenges and answer the calls for action of the youth and civil society in the streets, and of the vast majority of the world’s scientists.

The [European Green Deal](#) promises a ‘set of deeply transformative policies’ to ‘transform the EU’s economy for a sustainable future’, and it states the ambition to make European food a ‘global standard for sustainability’. This is not a meagre endeavour and will require bold policies to deliver system change. Getting this right will create a healthier society, safeguard our environment, and secure the future viability of EU farming and food businesses. To achieve truly sustainable food systems, the EU Green Deal’s Farm to Fork Strategy must include the following 18 policy actions.

Transformative governance for sustainable food systems

Set targets to drive the transformation towards a sustainable food system

Quantitative time-bound targets backed up by robust monitoring are required to drive change in the food system at the necessary scale and pace. The EU must commit to bring the footprint of our food system within planetary boundaries by 2040 at the latest¹ and must set **SMART targets in the Farm to Fork Strategy and further legislative initiatives**, including

- Cutting our **food consumption footprint** by at least 30% by 2030² (from a 2020 baseline),
- Achieving **land degradation** neutrality by 2030,
- Reducing **CO₂ and non-CO₂ emissions** from agriculture by 45% by 2030 and 60% by 2050 (from a 1990 baseline)³,
- Achieving good status for **farmland biodiversity** (including pollinators) by 2030,
- Improving **nutrients** use efficiency across the full chain by 50% by 2030⁴ (from a 2020 baseline),
- Managing 50% of the EU’s agricultural area through **agroecological** systems (incl. organic farming) by 2050,
- Cutting **methane and ammonia emissions** by 33% and 25% respectively (compared to 2005 levels) by 2030,
- Reducing **fertilisers, pesticides, and antibiotics** use by 50% and the level of the Harmonised Risk Indicator by at least 30% by 2030 (from a 2020 baseline),
- Cut **food loss and waste** from the farm to the fork by 50% by 2030⁵ (compared to 2014 levels).

To ensure the targets are met, sound monitoring and reporting of progress should lead to a ‘feedback loop’, whereby policies delivering on those targets, in particular CAP Strategic Plans, are amended if progress is not on track.

Align agricultural, trade, environmental, and climate policies

Inconsistencies between different EU policies affecting our food system have hindered progress towards our international commitments on the Sustainable Development Goals. The EU Green Deal and the Farm to Fork Strategy must take serious steps towards full policy coherence covering trade, agricultural, food, environment, and climate policies and laws. This means, first and foremost ensuring that national **CAP Strategic Plans support the implementation of existing EU environmental law and contribute to the objectives of the Green Deal**. We urge the EU Commission and co-legislators to amend the CAP Strategic Plans (SP) regulation in order to set EU-wide targets against the specific objectives of the CAP in

¹ Using for example the ‘[family of environmental footprints’ framework](#) developed by the Joint Research Centre (JRC).

² Using for example the JRC’s [Basket of Products food framework](#)

³ This includes agricultural emissions accounted under LULUCF. A [recent report by the Institute for European Environmental Policy](#) found EU agriculture can achieve a similar level of emissions reductions without major changes in land use.

⁴ Nitrogen, phosphorus, potassium. ‘Full chain’ as defined by [Mark Sutton et al. \(2013\) Our Nutrient World: The challenge to produce more food and energy with less pollution](#).

⁵ Food loss and waste reduction targets should be expressed as maximum kg food loss per hectare at farm level, maximum kg food waste per output of processed food at plant level, and maximum kg food waste per capita at consumer level.

order to create a level playing field among Member States while ensuring the environmental and climate ambition in CAP SP is coherent with our climate and environmental targets. Second, the Commission must ensure **trade agreements include enforceable clauses on commitment to the Paris Agreement**, non-regression on environment and environmental democracy, and ‘do not harm’ principles, with a real enforcement mechanism accessible to civil society and citizens. Finally, the Commission must **ensure ‘climate spending’ leads to effective emissions reductions** in the food system and amend its flawed tracking methodology for climate spending in agriculture⁶.

Adopt collaborative policy-making for all food and farming policies

Transforming the EU food system requires a transformation of how policies are made. The close collaboration between DG SANTE, AGRI, and MARE in developing the Farm to Fork Strategy is a step in the right direction. **DG ENVI, DEVCO and TRADE** should be involved on an equal footing to ensure the environmental and international dimensions of food systems are considered. This collaborative model of policy-making must continue in future, both when developing **initiatives emanating from the Farm to Fork Strategy** and in the implementation and future reforms of the **Common Agricultural Policy (CAP)**.

Enforce protective principles in food and agricultural policy

Essential protective principles such as **the precautionary, the “non-regression” and the “do no harm” principles must be enforced in all aspects of food and farming policy**. The EU cannot dismantle existing environmental legislation for the sake of simplification (*i.e.* through the “one in, one out” principle), and no EU funding should be spent on harmful practices (*e.g.* CAP funding for intensive livestock production or crop monocultures). In technology and innovation, precaution must remain the first priority, *e.g.* by ensuring that rigorous pre-approval test procedures are in place for new pesticides.

Environmentally friendly food production

Promote agroecological farming

Agroecology is a way of producing food by working with natural ecological and biological processes. It can use technology, but it is primarily grounded in natural sciences and knowledge-based innovation. The UN Food and Agriculture Organisation (FAO) promotes it as a solution to tackle the multi-faceted social and environmental challenges facing the global food system: “agroecology can support food production and food security and nutrition while restoring the ecosystem services and biodiversity that are essential for sustainable agriculture. Agroecology can play an important role in building resilience and adapting to climate change.” To **facilitate the mainstreaming of agroecological practices in EU agriculture**, the Commission should promote agroecological farming based on the [principles set out by the FAO](#) and require Member States to promote agroecological farming practices through their CAP Strategic Plans.

Initiate a sustainable transition for EU livestock farming

Farm animals play an important role in food systems, but intensive livestock production is highly unsustainable: it overloads the environment with nutrients, contributes to climate change and dangerous air pollution, and relies on destructive monocultures for feed production. The EU must move away from this system, and enable a **transition towards circular, extensive livestock production as part of mixed farming systems**, which respects the carrying capacity of the local environment and supports biodiversity. A coherent policy mix should enable this transition. First, the CAP must not fund any livestock farming above a sustainable stocking density level and should instead support and promote sustainable, extensive livestock farms. Second, the Industrial Emissions Directive framework should be revamped, to replace the Best Available Techniques Reference Document (BREF) on Intensive Rearing of Pigs and Poultry with a BREF for Sustainable Livestock Farming. Third, regulation should set a compulsory baseline for animal welfare and strict maximum levels of nitrogen and phosphorus per hectare across the EU to cap livestock density to sustainable levels⁷.

⁶ [European Court of Auditors \(2016\) Spending at least one euro in every five from the EU budget on climate action: ambitious work underway, but at serious risk of falling short](#)

⁷ Such a limit could be set at 170kg N/ha limit as per the [organic farming regulation](#) and 22kg P/ha as implemented in Sweden.

Adopt an EU protein plan for sustainability

Demand for plant protein crops has increased substantially in recent decades due to increased EU production and consumption of animal products. This demand is met by protein imports linked with deforestation, human rights abuses, and environmental destruction. The EU needs to develop a Protein Plan that will seek to **reduce demand for protein crops to more sustainable and equitable levels** and to promote sustainable production of pulses in Europe for human nutrition.

Develop localised and fully circular nutrient management

EU agricultural land has 49kg of nitrogen surplus and 1,9kg of phosphorus surplus per hectare, causing GHG emissions, soil degradation, and water and air pollution that harms human health and biodiversity. Seeking to reduce fertiliser use is a good start, but it must be part of a broader package of measures to **improve nutrients use efficiency (NUE) throughout food supply chains**. Organic waste (from field residues, manures, food waste, and sewage sludge) should be returned to farming systems as anaerobic digestates or compost and never be incinerated or dumped in landfills. CAP Strategic Plans and the Circular Economy Action Plan should support the move towards localised and fully circular nutrient management in the bio-economy and food supply chains.

Implement nature-based solutions on agricultural land

To support the EU's biodiversity and climate objectives, the Farm to Fork Strategy must contribute to the **protection and restoration of ecosystems currently used for food production**. A particular focus must be placed on the restoration of **grasslands** and drained **peatlands**, two major carbon sinks. Production systems such as paludiculture and extensive grazing can be deployed to manage these restored ecosystems. In addition, the Farm to Fork Strategy must ensure the protection of semi-natural habitats used in agriculture from intensification (eg. hay meadows and landscape features), and of remaining natural eco-systems from agricultural expansion (eg. peatlands, wetlands, and old-growth forests).

Address the environmental impacts of fisheries and aquaculture

The Farm to Fork Strategy must **address the ecological and climate impact of the seafood consumed in the EU** (both from fisheries and from aquaculture). As a first step, the EU must deliver on the legally binding measures it is committed to, such as Marine Strategy Framework Directive, the Water Framework Directive and the marine Natura 2000 sites under the Birds and Habitat Directive. Overfishing under the Common Fisheries Policy and illegal, unreported and unregulated fishing under the IUU Regulation must be stopped to guarantee EU consumers sustainably-sourced and traceable seafood. It is imperative that the EU addresses the impact in fisheries and aquaculture both in the domestic market and in its imports⁸.

Healthy and sustainable food consumption

Promote sustainable and healthy diets, with less and better animal products

The evidence is unequivocal on the need to deeply change our diets for our health and the health of our planet. Europeans need to eat more pulses, wholegrains, fruit and vegetables, and smaller quantities of higher quality animal products. Food labelling based on a robust ecological footprint methodology² can play a role in promoting healthier diets, but it is not sufficient. Other policy tools including green public procurement guidance, fiscal instruments, and regulating advertising and marketing are also needed to make the sustainable and healthy choice, the easy choice, as part of healthy and sustainable food environments.

Promote nutritious and resilient crop varieties

Selective breeding over the past decades with a focus on uniform, high-yielding and aesthetically pleasing crops, has led to a decline in the genetic diversity and nutritional value of most commercial food crops. In an age of unstable climate and widespread diet-related diseases, this needs to change. **EU research and innovation funding should focus on increasing crop genetic diversity and promoting crop varieties for their nutrition and adaptability**. Agrobiodiversity and diverse farming systems such as agroecology should also be promoted through the CAP.

⁸ See the [Blue Manifesto](#), published by Seas At Risk and undersigned by the EEB amongst others, for more details

Speed up the move towards less and circular packaging

First, food packaging must be reduced, *e.g.* through stricter regulation or levies on single-use packaging for manufacturers, distributors, retail and restaurants. What cannot be reduced should be reusable, *e.g.* through refund systems on containers, crates and boxes. What cannot be made reusable should be fully and easily recyclable, *i.e.* making recyclability a criterion for production permits.

Reduce food loss and waste across the full supply chain

Food loss and waste costs us billions of euros annually and increases pressure on ecosystems. The EU should seek to prevent food losses on-farm and across the supply chain and food waste post-consumption. To prioritise waste hotspots, rather than a flat-rate EU-wide percentage reduction target, the reduction targets should be expressed as maximum loss or waste per hectare, kg processed food, and capita. The waste that cannot be prevented at the source should be repurposed in other products or recovered for animal consumption. Remaining waste must be processed and recycled to recover the nutrients.

Protect EU citizens against chemical substances

Despite pressure from our trading partners to base the regulation of substances used in agriculture, food production and processing on “specific risk assessment”, the EU must maintain its focus on a **generic risk assessment** (including by setting cut-off values for certain substances or applications) and on preventing exposure for vulnerable groups. Additionally, existing regulation on food contact materials (packaging) and articles (processing and transport) must be improved to assess chemicals in final articles and **apply equal safety requirements for virgin and recycled materials**. The rules should also apply to paper, inks and other materials in contact with food and likely to migrate into it. Finally, the regulation must apply by default to substances already restricted in the EU and those meeting the REACH criteria for Substances of Very High Concern.

Fair and sustainable food supply chains

Ensure food and agricultural imports do not undermine global climate targets

Our imports must not undermine global efforts to tackle climate change. The EU should define robust **standards for monitoring GHG emissions embedded in agricultural imports**. Regulation is also needed to ensure no products sold in the EU are linked to deforestation, land grabbing of native lands or human rights violations. Moreover, **agricultural and food imports should be included in the proposed Carbon Border Adjustment mechanism**. This can protect the competitiveness of EU food producers who are subject to high environmental standards, while preventing carbon leakage.

Promote short and fair supply chains

Conventional supply chains lack transparency and are increasingly characterised by a concentration of power in the hands of few actors, at the cost of primary producers. Short supply chains – defined by the low number of intermediaries between farm and fork – have many environmental, social, and economic benefits; they reconnect consumers and producers, create local jobs, and secure fair prices for producers. The Farm to Fork Strategy and the CAP should therefore actively **promote food distribution models based on short supply chains, including community-supported agriculture, local markets, and food hubs**. In addition, the Commission should also closely monitor the implementation of the Directive on Unfair Trading Practices, and if shortcomings appear, commit to strengthen it decisively.

Ensure the transition leaves no one behind

Measures should be taken to guarantee that the agenda of digitalisation and sustainable transition does not disfavour small actors disproportionately. The transition to sustainable food systems must address inequalities and should be both inclusive and participatory. The new Just Transition Fund should also support those who need to change radically (*eg.* intensive livestock operations) in the transition to sustainable food systems, just like in other sectors.

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