Consultation response on the Farm to Fork Strategy Roadmap

The EEB welcomes the opportunity to comment on the European Commission's Roadmap for the Farm to Fork Strategy. We strongly support support the stated objective to "transition towards a sustainable food system that should have a neutral or positive environmental impact, is capable to adapt to climate change and at the same time contributes to climate change mitigation, ensures food security and creates a food environment which makes healthy diets the easy choice for EU citizens." However, the EEB sees no evidence to support the statement that "the transition into more sustainable food systems [...] is ongoing." EU agriculture's greenhouse gas emissions have been rising since 2012,[1] diet-related non-communicable diseases have been increasing steadily for decades,[2] and the environmental footprint of our food consumption increased by 10% between 2010 and 2015.[3]

There is ample evidence that a comprehensive transition towards sustainable food systems is needed,[4] to address some of the existential threats we face. Together with other civil society organisations, the EEB believes that the Farm to Fork Strategy (hereafter, the Strategy) represents an important opportunity to deliver a coherent response to food-related challenges and pave the way towards an integrated, sustainable food policy for the European Union (EU).[5]

Our overarching key messages

- The current food system is failing on economic, social, and environmental counts, and the policies in place are not providing the right impetus for change.[6] **The Strategy must commit to system change and set a clear direction of travel towards a sustainable food system based on the principles of agroecology**. Tweaks in the margins of the current food system will not be enough.
- Intensive agriculture and dietary patterns are major drivers of all current environmental challenges. **The Strategy cannot cherry pick issues or solutions but must adopt a holistic and joined-up approach to environmental sustainability**. A healthy environment and a stable climate are the foundation of food production and must be front and centre in the Strategy. Economic viability cannot be pursued in isolation of environmental (and social) sustainability.
- The Strategy must take a **rights-based approach to food, which means placing the primary responsibility for change on public authorities at all levels (from EU to local). They must take adequate measures** to shape healthy, inclusive and sustainable food environments, within a fair and sustainable food system, and to set up robust monitoring and accountability mechanisms to review progress.[7] Accordingly, measures must go beyond voluntary corporate action and consumer information, which fall short of the required transformation of food environments and systems.
- **Step up environmental compliance assurance within the agriculture, fisheries and aquaculture sectors**, as a key priority under the Strategy. The EU already has excellent environmental laws, which is not

[1] EEA, National emissions reported to the UNFCCC and to the EU Greenhouse Gas Monitoring Mechanism, 2019
[2] WHO, Better food and nutrition in Europe: a progress report monitoring policy implementation in the WHO European Region, 2018
[3] Sala, S., Benini, L., Beylot, A., Castellani, V., Cerutti, A., Corrado, S., Crenna, E., Diaconu, E., Sanye Mengual, E., Secchi, M., Sinkko, T. and Pant, R., Consumption and Consumer Footprint: methodology and results, 2019
[4] CSO letter to Ursula von der Leyen on the need for an integrated food policy from 16th July 2019
[5] CSO letter on the Farm to Fork Strategy from 13th December 2019
[6] Pe'er et al., Action needed for the EU Common Agricultural Policy to address sustainability challenges, 2020
[7] International Covenant on Economic, Social and Cultural Rights

being implemented. The European Commission must increase efforts to enforce the Birds and Habitats Directives, Nitrates Directive, Sustainable Use of Pesticides Directive (regarding IPM), Water Framework Directive, and Ambient Air Quality and National Emissions Ceilings (NEC) Directives. It should also be an explicit priority to reduce the problematically high number of exemptions and derogations granted to circumvent these directives, directly undermining their impact.

Our policy recommendations

The EEB agrees with the five objectives listed in the Roadmap for the Strategy. However, we note with concern the absence of several important areas, notably, governance, research and trade, which must be addressed to transform our food system. We also disagree with the separation of mid-chain aspects (processing, retail etc.) from consumption. In the following policy recommendations, we treat mid-chain and consumptions jointly through the lens of food environments as the processes and decisions related to our food after production are intrinsically linked to consumption and should be addressed in an integrated manner. In contrast, we treat agriculture and fisheries/aquaculture separately, to emphasise the importance of tackling both areas seriously.

Set clear and quantified objectives to drive the transformation towards a sustainable food system

- Commit to bringing the overall environmental footprint of the food system **within planetary boundaries by 2040 at the latest**, to achieve a "neutral or positive environmental impact" as announced in the Roadmap. This commitment must be underpinned by a sound and transparent methodology, and accountability must be ensured by establishing a robust monitoring and reporting process.
- There is a growing scientific and societal consensus[8] that food production systems must transition towards agroecology for long-term sustainability. The Strategy should clearly indicate that **the vision for EU agriculture is to evolve towards agroecology**, as defined by the UN FAO.
- Set quantitative, time-bound targets backed up by robust monitoring, to drive policies in the right direction and at the right pace, covering at least:
    - Reducing **CO_2 and non-CO_2 emissions** from agriculture by 45% by 2030 and 60% by 2050 (from a 1990 baseline)[9]
    - Achieving favourable conservation status for **farmland biodiversity** by 2030
    - **Reduce bycatch to sustainable levels and achieve good environmental status** of fisheries and marine ecosystems by 2023 where possible and 2030 at the latest[10]
    - Improving **nutrients** use efficiency across the full chain[11] by 50% by 2030 (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

[8] For example IPES-food 2019, Towards a Common Food Policy for the EU; FAO 2018, Transition towards sustainable food and agriculture.
[9] 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.
[10] Under the Marine Strategy Framework Directive.
[11] Full-chain nutrient use efficiency as conceptualized in Sutton et al., Our Nutrient World: The challenge to produce more food and energy with less pollution, 2013.

- Reducing **mineral 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 2030 (compared to 2014 levels)
- Achieving **land degradation** neutrality by 2030

- The Strategy should also announce an in-depth, fully participative process to develop a European strategic **long-term vision for sustainable food systems** in 2050.

Develop an inclusive and transparent governance and regulatory framework for policy coherence and transformation

- **Take serious steps towards full policy coherence** covering trade, agricultural, food, environment, and climate policies and laws. For a start, the Farm to Fork Strategy should cross-reference commitments made under other Green Deal initiatives (incl. Biodiversity Strategy and Circular Economy Action Plan) that are relevant to food and farming; and vice versa.
- **Adopt close collaborative policy-making** between DG SANTE, AGRI, MARE, ENVI, DEVCO and TRADE for all food system policies, including when developing initiatives emanating from the Strategy and in the implementation and future reforms of the Common Agricultural Policy (CAP).
- **Enforce the precautionary, the "non-regression" and the "do no harm" principles** in all aspects of food and farming policy. Environmental legislation and well-fought for protections cannot be dismantled for the sake of simplification (*i.e.* the "one in, one out" principle) or based on innovation claims (*i.e.* the so-called "innovation principle"), and no EU funding should be spent on harmful practices (*e.g.* CAP funding for intensive livestock production or crop monocultures).

Drive the transition to sustainable agriculture through a comprehensive policy mix

- **Initiate a transition for EU livestock farming** towards circular, extensive livestock production as part of mixed farming systems to reduce GHG emissions, nutrients pollution, pressure on ecosystems and animal suffering, through at least the following policy actions: 1) ensure that no CAP funding supports intensive livestock farming and instead use CAP subsidies to support livestock farmers to be part of this transition; 2) set binding maximum livestock density in a revamped Industrial Emissions Directive and replace the Best Available Techniques Reference Document (BREF) on Intensive Rearing of Pigs and Poultry with a BREF for Sustainable Livestock Farming; and 3) adopt new regulations to set maximum levels of nitrogen (170kg/ha as per the Nitrates Directive) and phosphorus per hectare across the EU, to bring livestock density within the environmental carrying capacity.
- **Achieve fully circular and localised nutrient management, integrating ambitious targets on reducing mineral fertilisers as part of this policy mix rather than as an isolated point**: in addition to the above point on livestock, to the food waste reduction target and to the Integrated Nutrient Management Plan announced in the Circular Economy Action Plan, the Strategy should improve the recycling of nutrients from biowaste (manure, food waste, non-food organic waste, sewage sludge) into fertilisers through green cover, composting or anaerobic digestion. This should take place primarily in localised nutrients recycling networks to avoid long-distance transport and regional nutrients imbalances. In addition, the EU should set sustainable limits on the share of biomass which can be taken out of the agri-food system for other purposes (energy, fuel, bio-plastics etc.) based on a robust scientific assessment. This way, the EU can drastically reduce its dependency on synthetic mineral fertilisers.

- **Revise the climate mainstreaming tracking methodology** to ensure that 'climate spending' leads to effective emissions reductions in agriculture, as the current tracking methodology has been heavily criticised by scientists and the European Court of Auditors.[12]
- **Ensure the CAP Strategic Plans Regulation is compatible with the EU Green Deal**, for example by setting strict rules on conditionality, ambitious environmental budget ringfencing, and a robust performance framework, based on EU-wide binding targets against the specific objectives of the CAP to align the environmental and climate ambition of national CAP Strategic Plans with the EU Green Deal's climate and environmental targets.
- **Prepare and adopt an EU Protein Plan** to reduce demand for protein crops to more sustainable and equitable levels and to promote sustainable production of pulses in Europe for human nutrition. This is crucial to make EU diets healthier, ensure that foods edible to humans are not "wasted" as feed, cut GHG emissions and reduce detrimental impact on ecosystems, soils and biodiversity.
- **Fill the legislative gap on soil protection** by proposing a legally binding framework to address soil degradation at the EU level, including to reduce soil erosion, increase soil health and biodiversity, and tackle soil contaminants (chemicals, heavy metals, microplastics).
- **Address air pollution from agriculture** by accelerating the uptake of ammonia emissions reduction measures listed in the Annex of the NEC Directive, e.g. in CAP Strategic Plans, and by ensuring that the new Methane Strategy covers agricultural sources of methane emissions. Transitioning to less but better livestock production will also benefit air quality.
- **Include agricultural plastics into the Extended Producer Responsibility** (i.e. fertiliser, seed and plant packaging, agricultural films), to prevent leakage of toxic substances and reduce overall waste generation and introduction of microplastics in agricultural systems.[13]
- **Implement nature-based solutions on agricultural land through the CAP Strategic Plans**, with a particular focus on the restoration of grasslands and peatlands, two major carbon sinks, and on the protection of semi-natural habitats used in agriculture. This is a crucial area for integration between the Strategy and the Biodiversity Strategy.

Ensure a full transition to sustainable and low-impact fisheries and aquaculture

- **Halt or reduce bycatch of populations of species threatened** with extinction, in bad conservation status or not in good environmental status to a level allowing for their full recovery by 2023 where possible and 2030 at the latest. Bycatch of other species must be minimised and where possible eliminated. It is imperative to shift from non-selective and destructive fishing to low impact practices, as fishing is identified as one of the main causes of marine biodiversity loss.[14]
- **Address adverse impacts of fishing practices on sensitive habitats** to achieve good environmental status under the Marine Strategy Framework Directive through an action plan for the conservation of fisheries resources and the protection of marine ecosystems by 2023 where possible and 2030 at the latest. This includes changes in the use of fishing gear and phasing out certain destructive fishing practices like bottom trawling.
- **Guarantee real sustainability of feed used in aquaculture**, by ensuring that all fish meal and oil used in EU aquaculture is certified to IFFO RS in the short term. In the long term, ensure that all fish farms are net

[12] European Court of Auditors, Spending at least one euro in every five from the EU budget on climate action, 2016; Pe'er et al. 2020 as in footnote 6.
[13] See for example IEEP, ERP in the EU Plastics Strategy and the Circular Economy: a focus on plastic packaging, 2017
[14] UN IPBES global assessment report on biodiversity

producers of fish protein, by moving towards all fish feed being certified by credible and independent certification scheme (such as MSC) using low trophic index assessment criteria and FAO principles. An increased use of sustainably sourced non fish-based feed ingredients (such as algae, vegetable proteins and oils) must be prioritised.

- **Address issues with antimicrobial resistance** caused by unsustainable animal density and practices **as well as non-feed related ecosystem stressors** from aquaculture such as nutrient loading in the local environment and escapees' impact on wild populations.

Drive a transition to sustainable, healthy diets by creating enabling food environments

- **Promote sustainable and healthy diets, with less and better animal and seafood products**, through public procurement, fiscal instruments, and stricter regulation of advertising and marketing – including ending EU-funded marketing of livestock and seafood products.
- **Reduce overall packaging waste** to no more than 127 kg/capita/year by 2025 and 64 kg/capita/year by 2030, compared to 2016 levels. All packaging must be designed for reuse and recycling, provide transparency on the chemical composition, be separately collected and materials must be sustainably sourced. Reusable packaging should have a share of at least 30% of the market by 2030 for all primary packaging, and of at least 70% for beverage packaging.
- **Develop a framework for benchmarking food service and retail businesses** against environmental, social, and health criteria, including for example: share of organic food, nutri-score A products, and locally-sourced products sold in total offer. The benchmarking should be published and reviewed regularly. This could lead to the development of a mandatory sustainability label for food retail and service.
- **Improve Green Public Procurement (GPP) criteria and set minimum mandatory green criteria and targets for sustainable and healthy food**, to shift food consumption towards more sustainably produced wholegrains, pulses, and seasonal fruit and vegetables, and less but better animal and seafood products.[15] Sustainable and healthy food should be one of the priorities of the Commission's actions to boost GPP, as announced in the Circular Economy Action Plan, and it should also be incentivised through corporate green procurement. In addition, mandatory GPP criteria are urgently needed for product ingredients with a high risk of causing tropical deforestation worldwide, such as palm oil, soy, beef, cocoa or coffee.
- **Improve existing regulation on food contact materials and articles** (packaging, processing and transport) to assess chemicals in final articles and apply equal safety requirements for virgin and recycled materials. Maintain the EU generic risk assessment for new chemicals (including by setting cut-off values for certain substances or applications) and prevent exposure for vulnerable groups.

Tackle food waste

- **Introduce a clear definition** of food waste and losses in EU legislation which includes food lost and wasted at the level of primary production. **Commit to a binding target** of cutting food waste and losses in Member States across the chain by 30% by 2025 and 50% by 2030, compared to 2014 levels. **Establish EU guidelines** on how to meet EU food waste and losses reduction targets and develop a common EU methodology for measuring and prevention, including harvest food losses/losses on the field.

[15] "Better animal products" refer to meat, dairy and eggs produced in extensive, mixed and circular farming systems with high animal welfare and biodiversity value.

- Ensure that remaining food waste and losses is managed according to the **food waste hierarchy.**[16] Food waste and losses should be managed in a holistic way to retrieve nutrients according to the point on circular a localised nutrient management on page 4.

Align EU trade with the objectives of the EU Green Deal

- **Ensure all EU 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.
- **Define robust standards for monitoring GHG emissions** embedded in agricultural and food imports.
- **Include agricultural and food imports in the Carbon Border Adjustment mechanism for products with higher carbon footprint than equivalent products produced in the EU**. This can protect the competitiveness of EU food producers who are subject to high environmental standards, while preventing carbon leakage.
- Introduce regulation, including on due diligence, to **ensure that no products sold in the EU are linked to deforestation, land grabbing or human rights violations**.

Promote participatory research and knowledge exchange for sustainable food systems

- **Give priority to agroecological research for EU-funded research and innovation**. For example, R&I should focus on improving soil and ecosystem health for productive agriculture, and on promoting crop varieties for their nutrition and adaptability, to ensure resilience against pests and changing climatic conditions and to guarantee healthy food produces for EU citizens.
- **Promote knowledge-based and social innovation** in agriculture and improve the exchange of knowledge between research institutes and farms, through EU-funded farm exchanges, demonstration farms, and other scientific outreach programmes.
- **Commit to digitalisation and innovation for People and Planet**, guided by ethical principles and sustainability objectives. Specific technologies, such as precision farming, should not be automatically assumed to be sustainable as their impact can be positive or negative depending on how they are deployed.

Establish a socially and economically just food system

- **Promote food distribution models based on short supply chains,**[17] including community-supported agriculture, local markets, on-farm investments for direct sales to consumers, food councils and food hubs.
- **Ensure that the transition does not leave anyone behind**. Vulnerable actors (small producers, independent processors and retailers) with less resources to change their practices and business models should be supported, e.g. through the Just Transition Fund and the restructuring of the CAP, while large actors should be regulated more strictly.

[16] Zero Waste Europe, Food waste hierarchy
[17] As defined by experts in the EIP-Agri Focus Group on Innovative Short Food Supply Chain Management (2015)