To: Agriculture Ministers of EU Member States  
Cc: Commission President, Executive Vice-President for the European Green Deal and Commissioners for Environment, Health & Food Safety and Agriculture, and the Chair of the European Parliament Agriculture Committee  

Re: Input to the EU Agriculture and Fisheries Council Meeting, Brussels, 21 March 2022

Dear Ministers,

On behalf of the European Environmental Bureau, I am writing to share with you our views on some of the issues on the agenda of the forthcoming EU Agriculture and Fisheries Council.

Furthermore, we wish to stress the importance of accelerating the transition to sustainable food systems in light of the war in Ukraine. The evidence is clear: Europe is not facing a food shortage issue. However, low-income households across Europe will be hit hard by price increases and should be supported to access nutritious food with dignity. The war will also have dire and far-reaching impacts on food security in African and Middle Eastern countries who depend on wheat imports, and the EU must act promptly and according to a rights-based approach to prevent a rise in hunger.

Finally, the conflict has highlighted the EU’s dependency on fertilisers and livestock feed imports from Russia and Ukraine. This ought to be a wake-up call to the urgent need to move away from environmentally-destructive, highly input-dependent intensive agriculture. Utilising ‘food security’ concerns to push for further intensification of land use or to delay much needed environmental initiatives under the Green Deal appears as flagrant opportunism and does not provide the needed transformative and progressive answers that we need. We call upon Agriculture Ministers to steer clear of such dangerous narratives and false solutions which do not address the real issues and will hurt farmers sooner or later, as they are or will be amongst those most directly impacted by the climate and biodiversity crises. I invite you to take our concerns into account during final official level preparations as well as at the meeting itself.

We have structured the letter according to our understanding of the 21 March Council Agenda, focusing on the key files within our expertise and priorities.

1. Agricultural market situation, especially following the invasion of Ukraine

The aggression towards Ukraine and its knock-on effects on our agri-food system highlight the need for the EU to reduce its dependency on imports of non-renewable energy sources, mineral fertilisers, and grains and oilseed for feed. Objectives under the European Green Deal and ensuing Strategies would effectively support a transition away from reliance on such external inputs. The misrepresentation of current disruptions to trade as representing a threat to European food security is being used by some as a basis for undermining environmental measures and objectives. Yet, failing to achieve our green ambitions would indeed pose a dire threat to food security - and public health - in Europe, as it would jeopardise the natural resources our food production relies on.

We therefore call upon the Agriculture Council to:

- Stand firmly behind the European Green Deal and the Farm to Fork and Biodiversity Strategies, whose objectives – moving towards sustainable and resilient food systems and reversing biodiversity loss – are as relevant and urgent as ever in the current context;
- Ensure any extraordinary measures taken to mitigate the destabilisation of the cereal, oilseed and fertiliser markets are coherent with the European Green Deal and protect and progress the right to food, by strengthening local food systems grounded in the principles of agroecology;

European Environmental Bureau

Rue des Deux Églises 14-16, 1000 Brussels, Belgium  ●  +32 228 91090  ●  eeb@eeb.org  ●  www.eeb.org
International non-profit association  ●  Association internationale sans but lucratif (AISBL)  ●  EC register for interest representatives:
ID number: 06798511314-27  ●  BCE ID number: 0415.814.848  ●  RPM Tribunal de l’entreprise francophone de Bruxelles
• Accelerate the move towards circular nutrients management, in line with the Circular Economy Action Plan, by supporting farmers to reduce, and eventually phase out, the use of synthetic fertilisers, substituting them with safe organic fertilisers and compost, as well as wide crop rotation, leguminous crops, and green manures; and by rapidly halving food waste at all levels of supply chains;

• Facilitate a just and speedy transition away from industrial animal farming and towards extensive and mixed farming systems, and ‘less and better’ meat, dairy and egg consumption, to reduce the demand for cereals as feed.

2. Approval of CAP Strategic Plans

The post-2022 Common Agricultural Policy (CAP) has a key role to play in facilitating the transition to sustainable and resilient food production systems and should be an essential instrument in meeting the climate and environment-related targets outlined in the European Green Deal. This requires well-designed and ambitious national CAP Strategic Plans. However, as they stand now, Member States draft plans fall short of ambitions and lack clear targets, measures and funding to halt biodiversity loss and to cut greenhouse gas (GHG) emissions.

We therefore call upon the Agriculture Ministers to:

• Engage in constructive discussions about best practices for environmental and climate action in CAP Strategic Plans, to build a positive race to the top in terms of green goals and measures;

• Work closely with the European Commission to present revised plans that are truly putting agriculture on the path to sustainability;

• Commit to full transparency in the preparation of CAP Strategic Plans, including by publishing draft Plans, correspondence with the Commission in response to Observation Letters, and final CAP Plans.

Thank you in advance for your consideration of these points which support the ambitions of the European Green Deal and will help catalyse progress in meeting the environmental challenges facing Europe and the planet. This will respond to scientific evidence and also support EU and national legitimacy in the eyes of a public which broadly supports increased action at EU level to protect the environment.

We also firmly believe that in the current context of the Russian war in Ukraine, it is essential for the EU to promptly implement the Farm to Fork Strategy to help increase the resilience and sustainability of the EU’s food system.

Similarly, it is vital to stay true to the transformative EGD agenda more broadly and promote a carbon neutral, energy and resource efficient, circular economy, with a commitment to the Biodiversity, Farm to Fork, and Chemicals for Sustainability Strategies. This will support EU resilience in the face of pressures and create a stronger basis for a future for the youth of today who are arguably going to inherit a world in a much worse state than this generation unless we act decisively. We rely on you.

Yours sincerely,

Jeremy Wates
Secretary General