

Brussels, 12th December 2019

**Subject: CSOs open letter on the Farm to Fork strategy to achieve sustainable food systems**

**Dear Executive Vice-President Timmermans,**

CC Commissioners: Stella Kyriakides, Virginijus Sinkevičius and Janusz Wojciechowski

CC Director Generals: Jerzy Bogdan Plewa, Anne Bucher and Daniel Calleja Crespo

People in the EU have made unprecedented **calls for change** throughout 2019, demanding climate action, environmental protection, improved animal welfare and social justice. Food systems are pushing us across 'planetary boundaries', driving diet-related diseases and failing to deliver decent livelihoods in the EU and beyond: they are therefore at the heart of the change that citizens are demanding.

EU policies, and in particular the Common Agricultural Policy (CAP), have so far failed to drive a **transition towards sustainable food systems**. We therefore welcome the upcoming 'Farm to Fork' (F2F) Strategy, which represents a crucial opportunity to provide a coherent response to societal concerns about biodiversity, climate change, health, income of all workers in the food chain, social equity and animal welfare, amongst others.

We are concerned, however, that the **European Green Deal** does not reflect the urgent, systemic changes needed in our food system, nor contains concrete commitments to drive a fundamental transition.

In order to meet citizens' expectations, the F2F strategy must develop a coherent long-term vision for our food system, adopt **clear and ambitious targets**, implement transformative actions and create a robust monitoring and evaluation framework that includes corrective measures when targets are missed. In other words, the F2F strategy must pave the way for an integrated, sustainable EU Food Policy, and **sectoral policies like the CAP must be fully aligned with its objectives and targets**.

Furthermore, the undersigned civil society organisations consider that the following priority objectives and actions, **further elaborated in the Annex under seven key policy areas**, must be included in the F2F strategy if it is to address the urgent challenges in food systems:

- Develop a governance and regulatory framework based on inclusive and transparent processes, which pursues policy coherence and aims at food systems transformation.
- Drive a transition to healthy, more plant-rich diets with fewer and better animal products, by creating enabling 'food environments' underpinned by relevant consumption targets.
- Introduce greenhouse gas (GHG) emissions reduction targets for agriculture with particular attention to industrial livestock farming.
- Reverse biodiversity loss due to intensive agricultural practices at the latest by 2030, by supporting a transition towards agroecological practices.
- Minimise the impacts of farming on freshwater resources and ecosystems, from over-abstraction for irrigation to nutrient run-off and eutrophication.
- Set a legally-binding target for land degradation neutrality by 2030.

- Set a target of at least 50% of land being managed under agroecology and organic agriculture by 2050, with ambitious targets by 2030.
- Phase out the use of synthetic pesticides in EU agriculture, with an 80% reduction by 2030.
- Increase the production and consumption of organic food via EU-wide and national targets.
- Counter the disappearance and concentration of farms in the EU, by ensuring decent livelihoods and working conditions for farmers and farm workers.
- Reverse the power and wealth imbalances in the food supply chain, by supporting producers and shorter and fairer supply chains.
- Support small-scale food producers and new entrants by developing policy measures to enable access to land.
- Ensure a just transition by introducing specific measures to expand access to good food for all and by aligning with wider efforts to create a solidarity-based, people-centred economy, with special focus on workers in the food chain.
- Reduce the global ecological and social footprint of the EU's food system through new legislative measures that reduce the demand for agro-commodities (such as soy, palm oil) and biomass linked to deforestation, ecosystem degradation and human rights violations.
- Set targets for prevention/reduction of food waste and loss (based on maximum food waste per capita per year) and take action to minimise food waste at each point in the chain.
- Protect food from harmful chemical residues, including agri-chemicals and leakage from food contact materials.
- Include specific targets and present legislation to improve EU animal welfare standards and ensure animal sentience is taken into consideration in all relevant policies.
- Commit to phase out the use of cages in animal farming.
- Set clear and ambitious reduction targets for antibiotic usage in animal agriculture (per class of antibiotic and animal species).

The undersigned organisations also warn against including actions which would reinforce existing production paradigms, innovation pathways and power relations, thereby distracting from the real solutions and undermining the transformative potential of the F2F Strategy, in particular:

- The deregulation of gene editing, including through the establishment of a new legal framework for products from new genetic engineering techniques. The current Directive on genetically modified (GM) organisms is fit for purpose.
- The excessive reliance on voluntary mechanisms, such as industry commitments or market-based measures, including carbon credit markets. Unless they are combined with mandatory requirements, such initiatives will not drive the needed change and risk crowding out more transformative measures.

In the Annex below you will find further suggestions for actions to underpin a F2F Strategy that is fit for purpose, and that can deliver its contribution to an ambitious European Green Deal.

Throughout this process, it is essential for the European Commission to widely engage with civil society organisations.

**The signatories of this letter look forward to working closely with the Commission to further develop these proposals, and remain at your disposal to discuss them in more detail.**

Signatories:

**actalliance eu**

**act:onaid**



**EUROGROUP FOR ANIMALS**

**GREENPEACE**



**Landwirtschaft mit Zukunft**



**OPEN SOCIETY EUROPEAN POLICY INSTITUTE**



**Slow Food® Europe**



## ANNEX

### 7 key policy areas that should be addressed by Farm to Fork

#### (1) Develop an inclusive and transparent governance and regulatory framework for policy coherence and transformation

- Pursue a food systems approach to identify and leverage opportunities for change at all relevant stages in the food chain, from production to consumption.
- Develop a holistic approach that addresses each food sustainability dimension, while prioritising action in areas where sustainability ‘tipping points’ may be reached, such as in relation to planetary boundaries.
- Advance coherence across policy areas by establishing common objectives and targets and by bringing different policies into coherence with these objectives, including the CAP, the Common Fisheries Policy and trade policy.
- Ensure cooperation across governance levels by strengthening coordination mechanisms between and within EU Institutions and with Member States, while giving voice to regional, municipal and community-led initiatives.
- Prioritise binding measures over voluntary mechanisms. For instance, voluntary carbon credit markets have so far not resulted in any real emissions reductions, and EU-level platforms based on voluntary industry commitments have repeatedly failed to achieve results.
- Introduce a policy to prevent conflicts of interest and increase transparency in policy-making and policy implementation to avoid the capture of decision-making processes by powerful lobbies and ensure the correct use of evidence.
- Take proactive measures to enhance participation on an equal footing of those who have less power and resources to take part in decision-making processes, including people living in poverty, small scale food producers, fisherfolk and youth organisations.
- Support a democratic and participatory global governance of food and agriculture, in particular within United Nations bodies, and explore the option of an international convention on sustainable food systems.

#### (2) Support a transition to food production that safeguards the environment, the climate, and our health

- Support a transition towards agroecological farming practices. This is crucial to address the multiple and interconnected environmental issues facing agriculture. Ensure the CAP funds this transition.
- Set ambitious, binding targets on terrestrial and marine ecosystems restoration, and on safeguarding and creating space for nature on agricultural land (fallow land, non-productive features, etc.).
- Introduce GHG reduction targets for agriculture, and drive action to reduce emissions from industrial livestock farming and to increase soil carbon sequestration. Targets must seek to reduce the absolute footprint of the sector, not simply relative efficiency gains.
- Minimise the impacts of farming on freshwater resources and ecosystems, from over-abstraction for irrigation to nutrient run-off and eutrophication.
- Set targets and action plans to reduce overall nutrient losses from agriculture (Nitrogen Use Efficiency for the sector as a whole), as well as specific targets to reduce diffuse water pollution (nitrates and phosphates) and air pollution (ammonia and methane).
- Ban all irrigation infrastructure which leads to over-extraction of water resources.

- Reduce agro-chemicals use and dependency (including a target to reduce synthetic pesticides use by 80% by 2030). Use the CAP and the Industrial Emissions Directives to move mainstream agriculture away from agro-chemicals and towards sustainable integrated pest and soil fertility management.
- Move to the internalisation of external costs, with the aim of enforcing the “polluter pays” principle and rewarding practices that deliver public benefits.
- Protect marine ecosystems, by promoting inclusive governance of the seas and the oceans and ensuring sustainable fishing practices.
- Develop a pathway for a just transition to sustainable animal farming to reduce the land and carbon footprint of the sector and bring it within our environment’s carrying capacity.
- Scale up the production and consumption of organic food by proposing quantifiable targets at EU and national level.
- Develop a policy framework to ensure every actor in supply chains reduce their environmental and health footprint, including in food processing, packaging and retailing.
- Take action to reduce food losses at every stage of food supply chains, especially during production and storage.
- Improve the monitoring and evaluation of agricultural and environmental policies, to establish reliable, ongoing monitoring of the environmental impacts of food production, processing, packaging and transportation across the EU and in partner countries.

### **(3) Drive a transition to sustainable, healthy diets by creating enabling food environments**

- Set clear and quantifiable targets related to the EU’s contribution to halving global meat consumption by 2050; to reduce the incidence of obesity and a select number of diet-related non-communicable diseases (NCDs); and to advance the wider uptake of sustainable, healthy eating patterns.
- Support the creation of food environments that enable healthy, sustainable diets by launching a dedicated action plan to ensure the adoption of food policies recommended by the World Health Organization at the relevant levels of governance, including European.
- Bring forward policies across the food chain to support less and better meat and dairy consumption.
- Spearhead the development of sustainable dietary guidelines.
- Support community initiatives that empower people experiencing socio-economic disadvantages to move towards healthy, sustainable consumption.
- Develop food-related sustainability indicators to measure and monitor key environmental footprints, including for greenhouse gas emissions, and land, water and energy use.

### **(4) Establish a socially and economically just food system**

- Ensure a just socio-economic transition, by aligning the Farm to Fork strategy with other EU initiatives aimed at creating a social, people-centred economy and include mechanisms to mitigate potential adverse short-term transition effects for certain producers and workers in the food chain.
- Support alternative business models, such as short and direct supply chains and consumer co-operatives, which can bridge the gap between producers and consumers, and overcome power and wealth imbalances in the supply chain.
- Protect the most vulnerable actors in the supply chain from unfair trading practices, by ensuring the adequate transposition, monitoring and enforcement of relevant EU legislation.

- Ensure that human and labour rights are respected and adequately enforced, and that gender-based violence at work is eradicated from food supply chains.
- Address the issue of generational renewal by making farming more appealing to young farmers and new entrants, and by developing a Land Directive that ensures access to land.
- Support local and regional governments committed to transitioning towards sustainable food systems, by promoting initiatives such as food policy councils and bio-districts at regional level.
- Support cooperatives in partner countries to improve small scale food producers' bargaining position in value chains, with special attention to women's cooperatives which are a powerful tool for emancipation.

#### **(5) Ensure the welfare and health of farmed animals**

- Recognise that improved farm animal welfare is a central component of a sustainable food system and that high animal welfare standards significantly contribute to increased animal health.
- Include specific targets and present legislation to improve and go beyond EU animal welfare standards; ensure animal sentience considerations are integrated in the shaping of policy and legislative objectives.
- Commit to phase out the use of cages in animal farming.
- Support new legislation on species not covered by species-specific legislation, such as dairy cows, rabbits and fish, and invest in the effective enforcement of existing legislation related to animal welfare and animal health with concrete measures in cases of non-compliance.
- Ensure that imports meet the EU's animal welfare standards. This should be a precondition for all imported products into the EU.
- Stop the live export of animals to third countries and transition to a trade in meat and carcasses.
- Address animal welfare externalities beyond societal concerns by investigating the relationship between poor animal welfare and associated hidden production costs that reduce economic efficiency and output quality.
- Halt the overuse of antibiotics in terrestrial and aquatic industrial livestock and its contribution to the threat of antimicrobial resistance (AMR) by setting ambitious reduction targets (i.e. per class of antibiotics and animal species).

#### **(6) Promote participatory research and knowledge exchange for sustainable food systems**

- Ensure that research and innovation in the food sector follows the precautionary principle, goes beyond 'technological fixes' for economic interests, and focuses on delivering the societal transition needed to empower food systems change, including through social innovation.
- Ring-fence 40% of the total agricultural research budget for agroecological and organic practices, in recognition of the importance of knowledge-based innovation.
- Conduct more participatory research on the environmental, economic and social potential of agroecology, including its effects on soils and land, and the capacity of species to adapt to climate change.
- Conduct research to study the nutritional characteristics and health benefits of traditional food varieties, artisanal and organic productions, local and seasonal foods, and minimally processed foods.
- Ensure the registration of seed varieties in public registers to guarantee better access to seeds and greater exchange of information.
- Organise comprehensive independent risk research on genetically modified organisms, including gene editing technologies.
- Overcome the food loss and waste data deficit by measuring food waste along the whole food supply chain (including harvest food waste measurement).

## **(7) Drive global action for sustainable food systems**

- Protect producers in third countries by adequately enforcing the Unfair Trading Practices Directive both inside and outside of the EU.
- Integrate strong environmental and social safeguards in trade deals through binding application of all international environmental, climate and human rights Treaties, as well as the core International Labour Organisation Conventions.
- Introduce regulatory measures that oblige companies, especially the biggest ones, to carry out a comprehensive supply-chain risk analysis, take adapted measures, and implement them effectively to ensure that no products that contribute to deforestation, degradation or conversion of natural ecosystems enter into Europe.
- Establish assessment methodologies on the impact of EU food and farming policies and trade deals on local food systems in third countries, including gender-disaggregated indicators related to the availability of a varied and healthy diet, access to local markets, safe production methods and so forth.
- Set up an observatory to monitor and signal potential and actual negative impacts of EU food exports on small scale food producers in partner countries, and vice-versa - the impacts of imports on EU farmers - to make sure the commerce of agrifood products does not harm local food production.
- Exclude the International Union for the Protection of New Varieties of Plants (UPOV) Convention from EU trade agreements, as it enshrines intellectual property rights on seeds, undermining farmers' rights to save, use, exchange and sell farm-saved seeds.

## Further reading

Eating better (2018) Principles for eating meat and dairy more sustainably: the 'less and better' approach. Available here: [https://www.eating-better.org/uploads/Documents/2018/better\\_meat\\_report\\_FINAL.pdf](https://www.eating-better.org/uploads/Documents/2018/better_meat_report_FINAL.pdf)

EPHA, FOEE, IFOAM EU, Slow Food (2018) Transitioning towards sustainable food systems in Europe. Available here: [http://www.foeeurope.org/sites/default/files/agriculture/2018/transitioning\\_towards\\_sustainable\\_food\\_systems.pdf](http://www.foeeurope.org/sites/default/files/agriculture/2018/transitioning_towards_sustainable_food_systems.pdf)

European Court of Justice C-528/16 July 2018. ECVC analysis available here: <https://www.eurovia.org/decision-of-the-european-court-of-justice-on-new-gmos-a-historic-victory-for-peasants-and-citizens-of-the-eu/>

Food and Agriculture Organization, 2018, FAO's work on agroecology. A pathway to achieving the SDGs. Available here: <http://www.fao.org/3/I9021EN/i9021en.pdf>

FAO and WHO (2019) Sustainable healthy diets – Guiding principles. Available here: <http://www.fao.org/documents/card/en/c/ca6640en/>

Galli et al. (2018) A transition towards sustainable food systems in Europe. Food policy blue print scoping study. Laboratorio di Studi Rurali Sismondi. Available here: [https://www.ifoam-eu.org/sites/default/files/food\\_policy\\_report\\_clean19-5-18.pdf](https://www.ifoam-eu.org/sites/default/files/food_policy_report_clean19-5-18.pdf)

Intergovernmental Panel on Climate Change (IPCC), 2019. Special Report on Climate Change and Land. Available here: <https://www.ipcc.ch/report/srccl/>

IPES Food, 2019. Towards a common food policy for the European Union - The policy reform and realignment that is required to build sustainable food systems in Europe. Available here: [http://www.ipes-food.org/\\_img/upload/files/CFP\\_FullReport.pdf](http://www.ipes-food.org/_img/upload/files/CFP_FullReport.pdf)

SDG Watch Europe, 2019. Spotlight report on Sustainability in Europe. Who is paying the bill? (Negative) impacts of EU policies and practices in the World. Available here: <https://www.sdgwatcheurope.org/documents/2019/08/whos-paying-the-bill.pdf/>

World Health Organization (WHO) (2017) "Best buys" and other recommended interventions for the prevention and control of noncommunicable diseases. Available here: <https://www.who.int/ncds/management/best-buys/en/>