

# Feedback on the Roadmap on the Farm to Fork Strategy for sustainable food systems

## SAFE Feedback to the European Commission

*Document addressed to the European Commission by SAFE – Safe Food Advocacy Europe ASBL*

SAFE thanks the Commission for allowing interested stakeholders to express their comments on the Roadmap on the Farm to Fork Strategy for sustainable food systems.

While SAFE appreciates the will from the European Commission to adopt a strategy aiming at the transition to more sustainable food systems for the EU, we would like to point out some elements we believe are essential to the achievement of this ambitious and commendable objective.

### **1. NEED FOR EU FOOD SYSTEMS TO PROMOTE AND MAKE AVAILABLE HEALTHY DIETS FOR ALL EU CONSUMERS**

SAFE is welcoming the European Commission's will to propose a Strategy that also takes into account consumers' health and well-being. To ensure this Strategy can deliver on this objective, we believe that it should include the following points:

#### **1.1. The creation of EU healthy diet guidelines:**

More and more European consumers suffer from non-communicable diseases (such as cardiovascular diseases, type 2 diabetes or cancer) linked to poor eat habits. Indeed, the World Health Organisation studies show that 20% of European adults are obese and 52% are overweight<sup>1</sup>, while around 60 million suffer from type 2 diabetes<sup>2</sup>. It is therefore essential for the European Union to provide Member States with common guidelines for healthy diet that be used to provide public authorities as well as individual consumers with reliant information. We insist on the need for transparency in the elaboration of those guidelines. They should be

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<sup>1</sup> World Health Organisation, (2020), *Data and statistics*. Retrieved on <http://www.euro.who.int/en/health-topics/noncommunicable-diseases/obesity/data-and-statistics>

<sup>2</sup> World Health Organisation, (2011), *Diabetes epidemic in Europe*. Retrieved on <http://www.euro.who.int/fr/health-topics/noncommunicable-diseases/diabetes/news/news/2011/11/diabetes-epidemic-in-europe>

developed based on the work of independent experts and adapted to each Member State geographical and cultural particularities. More specifically, those guidelines should address the health issues related to the overconsumption of animal products and promote an increase consumption of plant-based proteins and a decrease of animal proteins<sup>34</sup>. They should also tackle the overconsumption of sugar, salt, and fat.

### **1.2. Stricter origin labelling for meat and dairy:**

Origin, especially for meat and dairy products, is one of the first consumers' concern when they buy food<sup>5</sup>. In light of this, SAFE would like to invite the Commission to extend the EU origin labelling requirements to all meat and milk related products, including meat used as an ingredient and milk used in dairy products.

### **1.3. Create EU guidelines for public procurement promoting sustainable and healthy food and amend the Public Procurement Directives:**

Through the creation of common guidelines on public procurement, the Commission has the opportunity to encourage all public authorities in the EU to provide consumers with healthier and more sustainable food. Those guidelines should be based on the recommendation from the guidelines for healthy diets. Furthermore, in order for this initiative to be as effective as possible, we would like to recommend amending Public Procurement Directives to make mandatory the application of those public procurement guidelines.

### **1.4. Promotion of products reformulation to decrease sugar, salt, and fat contents:**

Through various instruments, such as levies and funding, the European Commission should encourage companies to reformulate their products to reduce their sugar, salt, and fat contents.

### **1.5. Create an environment orienting children and teenagers to healthier food choices:**

The European Commission should dedicate funding for educational programmes raising children and parents' awareness about the importance of a healthy diet and the health

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<sup>3</sup> Intergovernmental Panel on Climate Change, (2019), *Special Report on Climate Change and Land*. Retrieved on <https://www.ipcc.ch/srcl/>

<sup>4</sup> The EAT-Lancet Commission on Food, Planet, Health, (2019), *The EAT-Lancet report on healthy diets from sustainable food systems*, Retrieved from <https://www.thelancet.com/commissions/EAT>

<sup>5</sup> European Commission, (2013), *Report from the commission to the European parliament and the council regarding the mandatory indication of the country of origin or place of provenance for meat used as an ingredient*. Retrieved on [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling\\_legislation\\_com\\_2013-755\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_legislation_com_2013-755_en.pdf)

consequences attached with the excessive consumption of sugar, salt, and fat. Nutrition classes should become a mandatory requirement for primary and secondary schools' curricula.

We also believe that it is essential to amend the **Audiovisual Media Services Directive** to forbid any audiovisual marketing of unhealthy food products during broadcasting hours with a large children audience. The current text is only relying on self-regulation which is not sufficient to ensure that children exposure to unhealthy products is significantly reduced.

#### **1.6. Amend the EU Food Contact Material Regulation:**

Many studies demonstrate that various toxic chemical migrate from packaging to food, therefore exposing consumers to potentially harmful substances<sup>6</sup>. To ensure consumers' access to healthy food free from any contamination resulting from packaging.

## **2. NEED FOR THE FARM TO FORK STRATEGY TO ANSWER CONSUMERS' DEMAND FOR MORE SUSTAINABLE PRODUCTS**

Consumers' concerns about climate change and the environment are now impacting their expectations regarding the food they consume. They are increasingly asking for the opportunity to be able to purchase and consume food produced in a way that respect the environment and limits its impact on climate change. Furthermore, producing food in a more sustainable way can also protect consumers from the health issues linked to the use of chemical pesticides or the excessive reliance on fertilisers. Therefore, SAFE congratulate the Commission's initiative to launch a Strategy aiming at making food systems more sustainable. In particular, we believe that this Strategy should focus on:

### **2.1. Promote more sustainable way of farming such as permaculture and stock-free organic farming**

Considering consumers' interest for food produced in a sustainable way, the EU should promote the use of permacultural farming techniques as well as stock-free organic farming. Those types of farming allow to reduce the use of pesticides and fertilisers, increase biodiversity, and limit the production of Green House Gas emissions<sup>78</sup>. Therefore, we believe

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<sup>6</sup> SAFE, (2019), *Public consultation on food contact materials*. Retrieved on [https://www.safefoodadvocacy.eu/wp-content/uploads/2020/03/11\\_SAFE-Feedback-on-FCM.pdf](https://www.safefoodadvocacy.eu/wp-content/uploads/2020/03/11_SAFE-Feedback-on-FCM.pdf)

<sup>7</sup> Helen Harwatt, (2019), *Including animal to plant protein shifts in climate change mitigation policy: a proposed three-step strategy*, *Climate Policy*, 19:5, 533-541, DOI: [10.1080/14693062.2018.1528965](https://doi.org/10.1080/14693062.2018.1528965)

<sup>8</sup> Marco Springmann, H. Charles J. Godfray, Mike Rayner, and Peter Scarborough, (2016), *Analysis and valuation of the health and climate change cobenefits of dietary change*, *PNAS*, 113 (15) 4146-4151 DOI: <https://doi.org/10.1073/pnas.1523119113>

that those farming techniques should be encouraged in the Member States Strategic Plans of the new Common Agricultural Policy.

## **2.2. Promote the production and consumption of plant-based proteins**

Considering the impact of the overproduction and consumption of animal products on both the environment and people's health, SAFE would like to invite the Commission to promote the production of plant-based proteins in Europe in the Member States Strategic Plans of the new Common Agricultural Policy<sup>9,10</sup>.

## **2.3. Creation of a sustainable labelling framework**

To help consumers in making sustainable food choices and to incentivise producers to develop more sustainable products, SAFE call on the Commission to create a sustainable labelling framework easily understandable for consumers.

## **2.4. Reduce food waste with a special attention to harvest food waste**

In the EU, between 88 and 140 million tons of food waste are generated each year for a cost estimated at 143 billion euros. This represents not only an extremely important financial cost, but also an immense environmental one. To protect the environment, it is thus vital to reduce food waste and in particular harvest food waste which represents between 11% and 34% of the overall food waste in Europe and which is not included in the scope of the Waste Framework Directive (Directive (EU) 2018/851 amending Directive 2008/98/EC on waste)<sup>11,12</sup>. We thus invite the Commission to set the mandatory target of 50% reduction by 2030 at all level of the food value chain, including the production stage.

## **3. CONCLUSION**

SAFE congratulates the Commission for launching a public consultation on the Roadmap on the Farm to Fork Strategy for sustainable food systems. We believe that this Strategy constitutes an unprecedented opportunity to radically change EU food systems in way that will be both more respectful of our environment and of consumers' health and well-being. Therefore, we call on the

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<sup>9</sup> Intergovernmental Panel on Climate Change, (2019), *Special Report on Climate Change and Land*. Retrieved on <https://www.ipcc.ch/srccl/>

<sup>10</sup> The EAT-Lancet Commission on Food, Planet, Health, (2019), *The EAT-Lancet report on healthy diets from sustainable food systems*, Retrieved from <https://www.thelancet.com/commissions/EAT>

<sup>11</sup> FAO, (2011), *Global food losses and food waste – Extent, causes and prevention*. Retrieved on <http://www.fao.org/docrep/014/mb060e/mb060e.pdf>

<sup>12</sup> FUSIONS, (2016), *Estimates of European food waste levels*. Retrieved on <http://www.eu-fusions.org/phocadownload/Publications/Estimates%20of%20European%20food%20waste%20levels.pdf>

European Commission to strive for the most ambitious objectives possible and fix specific targets to make sure to achieve those objectives.