

Brussels, 26/10/2021

## SAFE contribution to the Inception impact assessment (IIA) on Sustainable Food System (SFS) Framework Initiative

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

### General comments

SAFE – Safe Food Advocacy Europe – strongly welcomes the European Commission’s recognition of the need of a horizontal **framework able to facilitate the transition towards a sustainable food system** and support the EU intention to establish **new foundations for future food policies** by introducing **sustainability objectives** and **principles** based on an **integrated food system approach**.

In 2019, SAFE joined a call<sup>1</sup> with other organizations from civil society to highlight the need for an integrated Common EU *Food Policy*<sup>2</sup>. SAFE is glad to see considerable potentials in the development of the SFS Framework initiative, which should keep high levels of ambition while also ensuring that this initiative will be up to the *critical* challenges our food system is experiencing.

The IIA mentions the results of the Fitness Check of the General Food Law Regulation stating that the current legislative framework governing the Union food chain is less adequate to address sustainability as it is sector based. In this regards, SAFE welcomes the presented approach of the Commission to establish a horizontal regulatory instrument in place at Union level, which could act as a guiding framework instrument that coordinates and drives changes across the food systems.

Given that the Initiative aims to create tools to help our food systems shifting towards sustainable ones, together with “*sustainability objectives and principles*”, we highly suggest the Commission to establish general references for what could be considered “sustainable”, in order to create tailored and oriented policy actions. In these regards, the transition could consider the six dimensions of sustainability, **these being: health, ecological, economic, social, ethical, and resilience**<sup>3</sup>.

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<sup>1</sup> CSOs open letter on the Farm to Fork strategy to achieve sustainable food systems, December 2019.

<sup>2</sup> Join letter, [https://www.safefoodadvocacy.eu/wp-content/uploads/2020/04/07\\_Open-Letter-to-the-EC-President-English.pdf](https://www.safefoodadvocacy.eu/wp-content/uploads/2020/04/07_Open-Letter-to-the-EC-President-English.pdf)

<sup>3</sup> see appendix of CSOs’ joint policy brief on food environments [https://foodpolicycoalition.eu/wp-content/uploads/2021/10/Food-Environments-for-SFS\\_EU-FPC.pdf](https://foodpolicycoalition.eu/wp-content/uploads/2021/10/Food-Environments-for-SFS_EU-FPC.pdf)

Finally, SAFE welcomes the proposed indicative elements that could be considered, highlighting in particular the reference to the need to clearly define “*responsibilities of food system actors*” and the establishment of “*‘push’ provisions, laying down minimum requirements for food products and related operations*”.

## Comments on the regulatory issues highlighted in the IIA

SAFE agrees with the regulatory issues highlighted in the Inception Impact Assessment (IIA), however, we believe that the following considerations are overlooked in the current IIA, and should therefore be further developed:

1. **Lack of consideration for nutritional related diseases and lack of clear commitment and objectives in order to improve consumers food habits:** the current Initiative does not mention specific targets to fight obesity, nor the need to structurally change the way food is also advertised. In fact, the IIA does not refer to the impact that the heavy marketing of HFSS food has on consumers food habits, missing to include fundamental actions able to help tackling the current obesity pandemic.
2. **Too much focus on a product-based approach:** the IIA pursue the proposition that the shift towards a sustainable food system will be addressed by ensuring that “*all foods placed on the EU market*” should “*increasingly become sustainable*”. This framework’s focus seems inconsistent with the goal of creating new integrated food systems, as it should rather address the sustainability of the entire system, including production *and* consumption.
3. **Attention on the sustainability assessment and on the “EU wide monitoring framework”:** to assess and monitor the impact of different policy options that will be led by the SFS Initiative, we encourage the Commission to design comprehensive and **system-based impact assessment** methodologies, providing specific indications on definitions and targets. This will help avoiding wrongful conclusions based on incomplete analyses.

## Comment on the presented policy options

We believe that neither Option 1 – mainstreaming food sustainability in existing initiatives, Option 2 – voluntary approaches, nor Option 3 – reinforcing existing legislation, can be considered as adequate or up to the goals set in the SFS Initiative.

According to SAFE, only **Option 4 – A new comprehensive framework legislation on the sustainability of the Union food system** offers the possibility to address in a comprehensive, effective, and equitable way the multiple challenges and opportunities linked to reforming the European food system.

SAFE strongly highlights that any option different from Option 4 will risk falling far behind the objectives set in the Green Deal and in the Farm to Fork Strategy. As the Initiative aims to ensure a sustainable, healthy, and climate-friendly food system, any policy option that will not be able to drive a structural change and create new level playing field for food system actors will not meet nor achieve the objectives set for this new framework.

### **Need to set specific targets for ensuring tailored and ambitious policy objectives**

The current IIA should include setting of specific targets in order to conduct fair and coherent assessments and monitoring of the Initiative. In this regards, SAFE wants to specify the need to include the following binding targets:

- In order to meet the objectives mentioned in the IIA as to *“optimise the production, distribution and consumption of food, so as to increase resource efficiency and reduce food loss”*, it will be fundamental to set both production *and* consumption targets to allow measuring progress towards healthy and sustainable diets.
- The need to set a target for reducing obesity levels of a certain percentage by 2030.
- Strong binding reduction targets (50%) for both food waste and food losses by 2030, across the whole food chain (from the farm all the way to the fork).

### **The importance of fostering enabling food environments to achieve SFS initiative objectives**

The food environment, in a widely used definition, refers to the “physical, economic, political and sociocultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food.”<sup>4</sup>

As described in a brief recently published by a coalition of CSOs on the topic, it is important to highlight that *“the ‘food environment approach’ recognises that the choices we make about food and the impacts they have are, to a significant degree, shaped by the contexts within which they are made. [...] It recognises that the most effective and equitable way to change food behaviours is to change the structural factors that drive food choice”*<sup>5</sup>.

Based on such approach, the initiative will be able to ensure that both food products (foods, beverages, meals) are made sustainable and that the healthy option is the default options health and other sustainability characteristics are maximised (food-based approach); *and the average dietary patterns are healthy and sustainable (systemic approach).*

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<sup>4</sup> HLPE (2017) Nutrition and food systems. A report by the High-Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

<sup>5</sup> See more in: [Food Environments & EU Food Policy. Discovering the role of food environments for sustainable food systems \(2021\) EU Food Policy Coalition.](#)

The food environment approach will help ensuring fundamental characteristics of the food market, improving the availability, accessibility, affordability, and desirability of foods for EU consumers.

## Conclusions

SAFE – Safe Food Advocacy Europe – strongly welcomes the European Commission’s recognition of the need of a horizontal framework able to facilitate the transition towards a sustainable food system and support the EU intention to establish new foundations for future food policies by introducing sustainability objectives and principles on the basis of an integrated food system approach.

SAFE agrees with the regulatory issues highlighted in the Inception Impact Assessment (IIA), however, we believe that the following considerations are overlooked in the current IIA, and should therefore be further developed:

- Lack of consideration for nutritional related diseases and lack of clear commitment and objectives to improve consumers food habits.
- Too much focus on a product-based approach.
- Attention on the sustainability assessment and on the “EU wide monitoring framework”.

These three issues are reflected in the absence of specific targets set in the IIA whose lack would prevent to conduct fair and coherent assessments and monitoring of the Initiative. In this regards, SAFE wants to specify the need to include the following binding targets:

- Setting of both production *and* consumption targets to allow measuring progress towards healthy and sustainable diets.
- The need to set a target for reducing obesity levels of a certain percentage by 2030.
- Strong binding reduction targets (50%) for both food waste and food losses by 2030, across the whole food chain (from the farm all the way to the fork).