

Annual Report 2020

SAFE – Safe Food Advocacy Europe



Several actions described in this activity report were financially supported by the LIFE programme of the European Commission under the Agreement No. LIFE19 NGO/FPA/BE000033. Contents and opinions expressed in this framework do not reflect the official opinion of the European Union and are the sole responsibility of Safe Food Advocacy Europe and its partners.

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Publications & Communications

Bi-monthly Newsletters are sent to SAFE's members to inform them of the latest news about EU food law and food safety.

Moreover, SAFE produced publications on several topics:

- **Acrylamide:** [Feedback to the European Commission on Acrylamide levels in food](#)
- **EU Common Agricultural Policy:**
 - [NGO Joint Letter calling for the promotion of legumes and high-protein plant crops under agricultural policies](#)
 - [NGO Joint Letter calling for full alignment of the reformed Common Agricultural Policy with the European Green Deal](#)
- **EFSA:** [Revision of the General Food Law: Transparency of Food Risk Assessment \(in SAFE's newsletter article January 2020\)](#)
- **Farm to Fork Strategy:**
 - [SAFE's call for feedback position paper on the Farm to Fork Strategy](#)
 - [NGO Joint letter urging the European Commission to publish the Farm to Fork Strategy on schedule](#)
- **Food contact materials:** [SAFE Position Paper on Food Contact Materials](#)
- **Food labelling:** [SAFE's opinion on recent EU-wide Front-of-Pack nutrition labels, 2020 \(from SAFE's newsletter\)](#)
- **Food waste:** [SAFE's policy report on food donations](#)
- **GMOs:** [NGOs' joint letter to Commissioner for Trade on GM food in EU-US trade negotiations](#)
- **Plant-based diets:**
 - [Position Paper on the Evaluation of Meat Labelling](#)
 - [Joint NGO letter to the European Commission for the promotion of legumes in agricultural policies](#)
 - [Policy Brief: Grow Green – Supporting sustainable plant-based production in the EU](#)
 - [NGO Joint letter on the French Act on the transparency of information on agricultural and food products](#)
 - [Joint letter calling on Members of the European Parliament \(MEPs\) to support the alignment of the CMO with the Farm to Fork Strategy](#)
 - [NGO Joint letter calling on MEPs to reject AM165&171 during the CAP vote](#)
- **Vegan standards:** [NGO joint letter to the ISO Technical Committee 34 about the International Standard ISO/DIS 2366](#)

Acrylamide

On 29 May 2020, SAFE sent its position paper on acrylamide levels in food to the European Commission, since the Commission is going to revise the acrylamide legislation in 2021 and thus asked relevant stakeholders to propose changes on the legislation and possibly include new categories in the new legislative framework.

Therefore, SAFE produced a position paper reiterating the position it stated in its previous position papers and opinions. Indeed, the children's food should have a lower benchmark level for acrylamide, since they are a vulnerable group. Moreover, SAFE repeated that there should be Maximum levels of acrylamide in food since some studies highlighted that this component could have harmful effects on humans. Furthermore, SAFE brought attention to a few more potentially dangerous categories, which could be inserted in the Commission Regulation 2017/2158 such as Spanish Churros, Roasted cocoa, dried fruits, vegetables crisps, and prune juice. SAFE attached several studies, which prove the dangerousness of this substance.

Food contact materials

In 2020, SAFE continued its activities on the food contact materials (FCMs) topic. In March it submitted feedback to the Farm to Fork Roadmap, highlighting the need for better access to healthier foods and an amendment to the current regulations on FCMs. In particular, SAFE focused on the risk of the migration in FCM, recycled plastics, and endocrine disruptors.



In May, SAFE co-organized a **Farm to Fork Assessment Workshop** as a member of the Executive Board of the EU Food Policy Coalition. Introduced by Roberto Reig (from Stella Kyriakides' cabinet), the workshop lasted for one morning with several breakout sessions about different topics including Food Contact Materials.

In the four new workstreams decided by the Farm to Fork Task Force of the Food Policy Coalition on the 10 September meeting, one has been dedicated to this topic. Indeed, SAFE decided to be part of one of these workstreams monitoring the European Parliament's Own-Initiative Report on the Farm to Fork Strategy to ensure that it contains strong statements concerning a stricter FCM regulation.

In October, SAFE transmitted a position paper that was shared with the offices of MEP Wiener, MEP Ripa, and Mr. Briggs from DG SANTE. SAFE stated that the FCMs Regulations do not ensure complete the safety of consumers and do not cover the numerous hazardous chemicals migrating into food as well as the new innovative materials such as recycled glass or plastics which have been proven to contain harmful chemicals, calling for stronger regulations.

Lastly, SAFE has been working on its policy report on Food Packaging and Food Contact Materials and it is currently being finalised and will be disseminated during the beginning of 2021.

Food Packaging

Background

The amount of food packaging has increased in recent years in part because of its practicability and convenience. As foodstuff is a product consumed 3 times a day on average by EU citizens, food-packaging waste increases accordingly; and the impact of food packaging waste on the environment is therefore significant. Proper waste management, as well as the promotion of less harmful material, is crucial to protect human health and the environment, to minimize the impact of food packaging waste and to promote more sustainable lifestyles.

Advocacy Actions in 2020

SAFE has actively collected scientific opinions of experts on food packaging. We have been following all debates on the matter and have participated in several conferences and meetings, including public hearings of the committees of the European Parliament (especially ENVI) and meetings of various stakeholders' groups of EFSA.

In the first trimester of 2020, SAFE sent its activity report to its members. It included a whole section related to Food Packaging and provided important policy information for the work ahead.

In April, SAFE co-signed a joint letter along with several other Civil Society Organisations addressed to the Executive Vice President Timmermans and Commissioners Kyriakides, Wojciechowski and Sinkevicius on the importance of not further delaying the publication of the Farm to Fork Strategy.

As part of better organizing its advocacy strategy, SAFE took part in the hearings on the Farm to Fork Strategy and engaged with MEPs offices (MEPs Ripa, Wiener and Hazekamp among others) and other NGOs to raise awareness on the issues related to FCM.



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Food waste

Background

In 2016, EU food waste alone is estimated between 88 and 140 million tons per year, for an estimated cost of 143 billion euros. Moreover, food waste generates about 8% of greenhouse emissions while 55 million EU citizens cannot afford a quality meal every other day¹. For this reason, in 2018, SAFE has intended to **tackle this issue at the EU level with a prime focus on urban communities**, first through **advocacy** to secure a proper measurement methodology for food waste, then through public **awareness-raising campaigns** aimed at promoting more responsible food consumption patterns and a long-lasting and sustainable food redistribution project in the city of Brussels.

On 18 April 2018, the European Parliament voted to formally adopt the revised Waste Legislation Package², which sets higher targets for waste management on recycling, packaging and landfilling for 2025 and 2030. This package (which includes the Directive on waste, Directive on the landfill of waste, Directive on packaging and packaging waste and Directive on end-of-life vehicles and batteries and accumulators) is a key element in the Circular Economy Action Plan. The series of targets set out by the EU mainly focus on reusing valuable waste materials, improving municipal waste management and waste packaging practices across Member States while further strengthening the “waste hierarchy” by placing prevention, re-use and recycling ahead of landfilling and incineration.

Besides, with the Farm to Fork Strategy³ came out in May 2020, the European Commission put the reduction of food losses and food waste as a priority in the EU. The Commission is committed to halving per capita food waste at retail and consumer levels by 2030. Using the new methodology for measuring food in 2022, it will set a baseline and propose legally binding **targets** to reduce food waste across the EU.

Advocacy actions in 2020

In 2020, SAFE continued building its networks to create a united front towards Food Waste reduction. In the beginning of January, SAFE had the first official meeting with the NGOs Feedback and Zero Waste Europe to discuss a possible collaboration on a large advocacy action plan designed to improve the existing regulation on food waste reduction both at the EU level and in member

¹ FUSIONS (2016), *Estimates of European food waste levels*. Consulted on [link](#)

² Directive (EU) 2018/851 of the European Parliament and of the Council of 30 May 2018 amending Directive 2008/98/EC on waste. Consulted on [link](#)

³ Farm to Fork Strategy of the European Commission.

states. The three organisations agreed to work closely together to design such an action plan and that we would need to find additional funding in order to implement it.

In the first trimester of 2020, SAFE sent its activity report to its members. It included a whole section related to Food Waste and provided important policy information for the work ahead. Also, at the end of July, SAFE published its members' newsletter including an article on food waste at the primary production level, stating the problems already pointed out in the joint letter with the Working Group on food waste in early July.

During January, SAFE worked with Zero Waste Europe and Feedback to work on the Food Waste Action Plan. SAFE continued its research for additional funding being able to get the Adessium Foundation, MAVA and the European Climate Foundation interested in supporting the project. Also, at the end of January, SAFE together with Feedback met Ms Nikolakopoulou, Deputy Director General of directorates D, E, F, and G of DG SANTE, and her team to discuss possible new actions to reduce food waste.

Furthermore, in May, SAFE and Equoevento Italy (which is its member), with the project consortium DUH (Germany), EBM (Slovenia), Zero (Portugal), Feedback (UK) drafted the document "Securing ambitious regulatory actions to tackle EU food waste and its environmental consequences" stating the food waste situation in countries involved to highlight the importance of funds to actively act on the food waste issue.

As well as the work on foundations, SAFE carried out other advocacy activities. At the beginning of March SAFE contributed to the Commission's consultation on the road map for the Farm to Fork Strategy. In its contribution, SAFE emphasised the importance of setting binding targets of 50% food waste reduction by 2030 for the entire food supply chain and more specifically for harvest food waste.

In June, SAFE contributed to the writing of the body of the letter and the recommendations on how to fight food waste at the primary production more effectively included at the end of the letter. On 8 July, the letter, entitled "The European Commission commitment on tackling food waste in the Farm to Fork Strategy", was sent to Commissioner Stella Kyriakides, involving Commissioner Sinkevičius, Wojciechowski, and Gabriel as well. The letter was also sent to the Food Policy Coalition.

SAFE has also been involved in the proposal of several Horizon 2020 projects on food waste under the call: "Building a low carbon resilient future: research and innovation in support of the European Green Deal". SAFE joined PNO consultancy firm and the University of Bologna in the call "Reducing

food losses and waste at every stage of the food chain including consumption, while also avoiding unsustainable packaging (IA)".

In November, SAFE started to design the policy report on food donation liability. The design consists of actualising concerning current European legislative frameworks on the matter, but also national cases to bring up potential best practices in food donation, with the view of providing recommendations. On December 23, SAFE released its policy report on Food Donation Liability. It has been sent to relevant staff of the European Commission: Anne-Laure Gassin, Cristina Lisetchi, Alexandra Nikolkopoulou, and Sabine Pelsser from DG SANTE.

Awareness-raising campaign "0% Food Waste, 100% Fair Redistribution"

SAFE has undertaken this campaign for more equitable use of food, sensitizing the public on the value of food, too easily labelled as waste. The project is not only about taking surplus food from shops as in the past but tries to involve hotels and catering as well, making the project broader. In order to do so, SAFE used the partnership with Equoevento.

Equoevento is a non-profit organisation and it is dedicated primarily to collect surplus food whilst fostering the uptake of responsible and ethical behaviours by the food industry. Given the increase in poverty and the growth in the number of people who are turning to charitable shelters every day, Equoevento operates to redistribute the food surplus produced for big events in full compliance with health and hygiene standards, ensuring sustainability, resource efficiency, and (most importantly) more hot meals on the tables of those in need.



In January, SAFE started to plan the implementation of its campaign "Equoevento Brussels - 0% food waste, 100% fair redistribution" and produced a spreadsheet of the project planning. SAFE started to make a market study to find out which would be the most efficient transportable mean for the campaign. Finally, SAFE also initiated to make extensive research to assess all the food safety implications of its project to ensure the project's compliance with Belgian food safety rules. For this reason, SAFE held several phone meetings with the Belgian Food Safety Agency (AFSCA) to discuss all the food safety implications of its project.

SAFE also contacted all the charities it was already working with to discuss with them the practical implications of this new campaign in comparison to the precedent one. Besides, SAFE contacted new associations as we expect to collect more food than with the previous project.

At the same time, SAFE also researched for suitable hotels to include in the project. Thanks to the work done for contacting hotels, SAFE met with a representative of The President Hotel, Radisson Blue hotel, and the Metropole in the months of January and February.

In mid-March, it was decided to put the project on hold considering the implication of the COVID-19 crisis on hotels' activities. However, we continued to exchange with the hotels that we already had contacts with.

Awareness-raising project “One Man’s Waste, Is Another Man’s Treasure”

In 2021, SAFE will re-start its project “One Man’s Waste, Is Another Man’s Treasure” financed by the LIFE Programme of the European Commission on reducing food waste, delivering food surplus from food shops to associations in Brussels.

Thus, in October, SAFE contacted Dioxyde des Gambettes transportation company and Sant’Egidio charity association to re-start in the city of Brussels the food waste project “One Man’s Waste, Is Another Man Treasure” in 2021, receiving a positive answer for joining the project.

In November, SAFE began to identify potential food shops to join the project, since Renard bakery, which was part of the project in the years 2018 and 2019, could not provide food anymore. After a detailed research, on the 23rd of December, Dam’Tartines and Sequoia signed the contract linking them to the project.



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Information to consumers

The Dual Food Quality Project

The Dual Food Quality (ECO) project started in September 2020 and is funded by the Directorate of Justice and Consumers of the European Commission. The project involves 3 partners:



- SAFE – Safe Food Advocacy Europe (Belgium)
- Associazione per la Difesa e l'Orientamento dei Consumatori - ADOC (Italy)
- InfoCons Association (Romania)

ADOC is the coordinator of the project and it is an association of consumers since 1999. ADOC is present in all 20 Italian regions giving public information and support, with particular reference to the food sector. InfoCons is a non-governmental organisation working towards a fair and safe marketplace for consumers in Romania since 2003.

The issue of dual quality in food products in the EU

In the food sector, “dual quality” has been characterized by products sold under the same brand with identical or very similar packaging, but with different ingredients and quality in different Member States. This topic has already been addressed by the Former President of the European Commission Jean-Claude Juncker in 2017, giving his full commitment to tackling the issue of dual quality.

While the dual food quality issue has been acknowledged and addressed by consumer organisations and public bodies, few products have been tested, and these tests have yet to cover all EU markets. Although an EU harmonised testing methodology to test dual quality in food products exists, there is a lack of simplified guidance to apply the methodology in practice as well as a common platform to disseminate test results and report potential unfair practices. As a result, the collective voice of consumers organisations in tackling this issue is absent. Therefore, SAFE has been working together with ADOC and InfoCons to create the ECO project, aiming at empowering consumer organisations to tackle dual food quality issue.

Project activities and progress

The ECO project targets national and regional consumer organisations with general interests or specific focus on food products, aiming to enhance their capabilities in testing food products on dual quality, disseminating test results, identifying and reporting potential unfair practices. Through the project, consumer organisations all over Europe will be provided with a harmonised guidance and step-by-step training materials to test dual food quality as well as a common platform to disseminate results and report potential dual quality practices.

The project is divided into 5 main Work Packages:

- 1) Project Management
- 2) Development of Guidance for Testing Products and Identifying Misleading Strategy
- 3) Empowering consumer organisations by disseminating the method for TPIMS (Testing Products and Identifying Misleading Strategy)
- 4) Creation of a tool fostering the cross-national cooperation of consumer associations and disseminating the results of the testing
- 5) Improving the advocacy of consumer organisations and fostering the cooperation between consumer organisations, competent authorities, and relevant private players.

The project's **Kick-off meeting** was held online on **24 September 2020**, where the project partners discussed the work packages. A guidance and a manual explaining how to test products will be developed and the aim is to share them with as many consumer organisations in Europe as possible so that they could perform tests on products. There will also be both a video explaining step-by-step how to test products and a recorded in-depth webinar for any consumer organisations who may encounter difficulties in using the written outputs. Finally, the Dissemination and Communication Plan is presented to disseminate the project activities and intellectual outputs, namely the use of social media and the creation of the project website that is needed for the project development.

The following stage was the organisation of the training on Dual Food Quality, which has taken place online on **26 – 27 October**. The consultant Cesare Varallo was hired to perform the training for the ECO project consortium. The training was divided into different sections, to fully cover the Dual Food Quality topic. The first part focussed on the legal aspect of the issue, including legal definitions, regulations, and some contexts about this topic. Next, the testing part was faced, discussing products that already been tested and relevant tests for detecting Dual Food Quality in the EU. Finally, some examples of Dual Food Quality in food was shown by Cesare Varallo.

In 2020 the project consortium met a couple of times more. On **5 November**, the **second meeting** of the project took place. SAFE presented the layout of the TPIMS Guidance and the Manual that need to be developed and divided the workload among all the project members. Lastly, SAFE presented the structure of the website that will be created, including an interactive platform where the results of product tests will be shared.

During the **meeting on 10 December**, SAFE updated the partners about the schedule for the website creation, which will be finalised by around February 2021, and informed the partners about the next steps of the project, namely testing products, creating a certification system, and the distribution of the Guidance to consumers organisations.

Moreover, on **9 November 2020**, the ECO project has been introduced during the European Food Forum's event called "Dual food quality: How we can solve the problem together", hosted by the MEPs Roza Thun, Asim Ademov, and Cristina Maestre. Silvia Cugini from ADOC presented the project and its objective. This event was important to disseminate the ECO project and to point out its relevance on this matter.

We Value True Natural Campaign

The current Commission's ambitions well reflect the rising consumers' demand for more sustainable food accompanied by clearer labelling standards. Ensuring correct labelling is a key step to help consumers to opt for more sustainable options. For this reason, SAFE started its campaign «We Value True Natural».

SAFE produced a report, which analyses the current situation regarding the use of the term «natural» on food packaging in the EU. The report describes the term «natural» in the EU legal framework and the fact that there is no clear definition of what is really natural and what it is not. Moreover, the report presents two controversial case studies: the opacity in labelling the difference between natural and synthetic ingredients in Zeaxanthin novel food; and the fact that melatonin supplements are not simply natural hormones, but they contain synthetic components as well. The report concludes with some possible solutions such as the amendment of EU Regulation 1924/2006 nutrition and health claims and criteria for labelling natural products, namely the nature of the components of the product, GMOs not allowed, and a biodegradable condition. Besides, in the report's annexe, some examples of misleading use of the term "natural" on food and beverages are provided.

On November 16, SAFE initiated its campaign dissemination. The report has been sent to Commission's officials via email. The same day, a video introducing the campaign has been published on YouTube.

On November 18, SAFE started to contact MEPs and journalists regarding this campaign. All relevant MEPs from the Committee on the Environment, Public Health and Food Safety (ENVI) and Committee on Agriculture and Rural Development (AGRI) of the Parliament have been contacted either via phone or email. Together with the mail, SAFE inserted the video, the report, and a link, where MEPs and journalists could sign the petition designed by SAFE, calling for better regulations on the use of the term «natural» at the EU level. Some of the MEPs signed the petition, for instance, the Portuguese MEP Francisco Guerreiro disseminated the campaign on his social media as well.

Furthermore, a few newspapers, such as Euractiv and Food Navigator, published articles on SAFE's campaign.

In addition, SAFE disseminated its campaign through its stakeholders, such as European NGOs, European Institutions, and SAFE members. SAFE continued this dissemination until the EFSA Stakeholders discussion on emerging risks, on 8-10 December. During this event, SAFE presented the ideas included in its report, stating that it is crucial to raise awareness on real natural food through proper legislation, stimulating researches and innovations (see page 18). On December 10, another video regarding ambiguous natural claims has been published on YouTube.

Finally, since the launch of the We Value True Natural Campaign and the video, SAFE has been active in disseminating the campaign on its social media such as Facebook, Twitter and LinkedIn, showing the most relevant news and milestones of the campaign.

Obesity

Tackling Adolescent Obesity - TAO Project

In 2020, SAFE kept on its work on the Tackling Adolescent Obesity (TAO) project, which started in September 2018 and will end at the end of February 2021. The project aims at **creating a comprehensive nutrition training for teenagers, which will address nutrition fundamentals and health risks related to inadequate nutrition, bullying, and discrimination.** It involves:



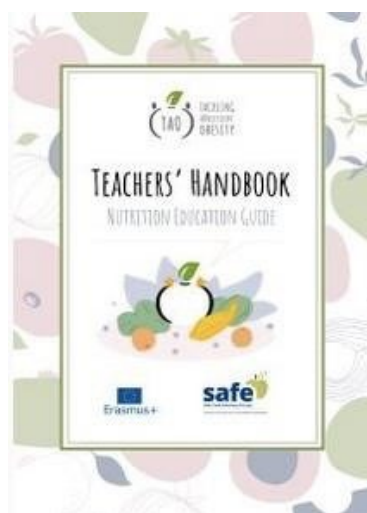
1. **SAFE Food Advocacy Europe**, Project coordinator, NGO.
2. **European Childhood Obesity Group**, European NGO.
3. **University of Rzeszow**, Polish university.
4. **Amici Obesi**, Italian association.
5. **Adipositas Hilfe Deutschland e.V.**, German association.
6. **Società Scientifica di Nutrizione Vegetale**, Italian obese patients' national association.
7. For 2018, **Kyriakou Children's Hospital** (Greek Hospital). From 2019, the Italian company **Emotifood** carried on the work of KCH.
8. **Doukas School**, Greek school.
9. **Liceo Scientifico Enrico Fermi Aversa**, Italian school.

The year 2020 was marked by the finalisation of three intellectual outputs planned by the project. All the intellectual output has been translated into Greek, French, and Italian to enable partner schools to implement the project in their language.

- In March, the **online platform** was launched. This platform contains tips on food, well-being, and movement, as well as interactive maps and quizzes for students. In addition, the online platform has a teachers' room, reserved for teachers.
- The **Student Handbook** was also formatted and published on the online platform and on SAFE website in April. This manual helps guide students in maintaining a healthy lifestyle, understanding the basics of nutrition and its psychological effects.



- Finally, the **teacher's manual** was completed and published online in June. It provides guidelines for teachers to implement nutrition activities in their classrooms.



The TAO project has also developed communication activities. On February 17, SAFE published a video to introduce about TAO project on YouTube. The video explains the importance of food regarding nutrition and health aspects, but also how a wrong nutrition scheme leads to social isolation. Unfortunately, bullying and obesity go together most of the time, thus the project aims to promote a more inclusive school environment.

In May, SAFE started a communication campaign for the project via Facebook and Instagram platforms. Through the “Meet TAO” page, SAFE proposed to the public a series of physical activities, recipes, labelling tips, and interesting articles to read.

On May 19, SAFE organised the 4th Transnational meeting. It was planned to be held in Italy in-person together with the “FilmDipeso Short Film Festival” that was supposed to take place in April. However, due to the covid-19 pandemic, the meeting was held online. During the meeting, a brief update on the project and then several IOs were presented. First, the online platform was presented in its Italian and Greek versions. After that, the layout of the Teachers’ Manual has been shown by SAFE with subsequent feedbacks from the consortium. The communication campaign on social media was presented as well and, finally, the meeting ended with the plan for implementing training in schools from September on (unfortunately impossible due to the pandemic).

The pilot training in the partner schools, scheduled to start in September, was finally postponed to the beginning of January 2021 in view of the uncertainty related to covid-19. During that time, SAFE reflected on how to implement training online since the current situation could not permit physical contacts.

Advocacy

SAFE has participated in several events related to obesity. SAFE participated in the Short Film Festival FilmDipeso, which was postponed to 18 – 19 September due to covid-19. This event aims to raise public awareness of the scourge of obesity through several short films. SAFE took this opportunity to present itself through a presentation and used this chance to create a network with specialists and actors involved in the subjects of adolescent obesity.

On 14 December, SAFE also participated in the event called “Prevenzione ed educazione come contrasto all’Obesità in età adolescenziale: Il progetto TAO”. The workshop addressed the issue of adolescent obesity and the crucial role of schools in prevention and nutrition education. TAO project was presented in detail, namely the intellectual outputs. Experts in obesity and psychologists who attended the event showed their interests in the project and the event is a great opportunity to disseminate the TAO project.

SAFE & The European Food Safety Authority (EFSA)

EU Transparency on risk assessment in the food chain

On 25 August, SAFE submitted its response to the Public Consultation on the Draft Implementing Regulation amending Regulation (EU) No 234/2011 on EU Transparency on risk assessment in the food chain, raising three main considerations.

Firstly, SAFE put emphasis on the importance of the independence of studies carried out by EFSA. This concept is essential for all the stakeholders involved in food production and the food chain. Secondly, consumers do not perceive the risk assessment process as fully transparent because of the multiple rules related to the risk assessment process and the confidentiality of many dossiers, which are not open to the public. Thirdly, there is a lack of credibility in this process, since the unavailability or opacity of certain files and dossiers lead to an unconfident perception of the impartiality of the risk assessment process.

Survey on NAMs (New methodologies approach)

SAFE filled in the EFSA's survey on NAM's stating its thoughts on the matter. First of all, SAFE welcomed NAM in order to move to non-animal-based technologies and for the European cooperation built on this initiative. However, SAFE raised its concern on risk assessment procedures, since its transparency is fundamental for the organisation.

Furthermore, the transparency of the risk assessment procedures should be guaranteed not only to stakeholders, but also to the public. Finally, all risk assessments should be conducted independently, not by manufacturers, which are more or less involved.

EFSA's Stakeholder discussion group on emerging risks

On 10 December, SAFE presented its We Value True Natural campaign in the EFSA's stakeholders discussion on emerging risks. In its presentation, SAFE highlighted some gaps in the EU legislation, such as that there is no official definition for the term "natural" in foodstuff. Therefore, SAFE provided some considerations based on the report included in SAFE's campaign: first of all, the EU should develop a common definition of "natural"; second, the EU should define criteria for the use of the term "natural"; and lastly, the information on the labelling should be easily understandable.

In addition, SAFE provided several examples of misleading food products bearing the term “natural”, ranging from beverages to pre-packed food. To conclude its presentation, SAFE pointed out the importance of raising awareness on real natural food through proper legislation, stimulating researches and innovations.

SAFE and the Food Policy Coalition

SAFE, as a member of the Executive Board of the [Food Policy Coalition \(EU FPC\)](#), participated in several **Executive Board meetings** dedicated to further building the Coalition and examining the opportunities to promote Food Waste reduction through the Farm to Fork Strategy. Those meetings were held regularly throughout the year.

On 25 May, SAFE co-organized a Farm to Fork Assessment Workshop as a member of the Executive Board of the EU Food Policy Coalition. The workshop lasted for one morning with several breakout sessions about different topics (Nutrient/fertilizers, chemical pesticides, impacts of livestock, animal welfare and antimicrobial resistance, carbon farming, organic farming, the new CAP, competition rules and position of primary producers, fish and aquaculture, bio-based economy and biotechnology, etc.).

In June, SAFE and other members of the Executive Board and of the EU Food Policy Coalition **met with Commissioner Kyriakides and several Commission officials from Directorate-General for Health and Food Safety (DG SANTE)** regarding the Farm to Fork Strategy.

In September, within the framework of the Farm to Fork taskforce of the EU Food Policy Coalition, SAFE took part in an exchange with the Group of the Greens party in the European Parliament on the upcoming Own-Initiative Report. From the Greens, MEP Tilly Metz attended, as well as assistants to MEP Sarah Wiener and Claude Gruffart, and two policy advisors.

In November, SAFE and several participants of the EU Food Policy Coalition exchanged with MEP Anja Hazekamp concerning the Farm to Fork Strategy. Furthermore, SAFE and the rest of the Board of the EU Food Policy Coalition organised the Coalition second General Assembly of 2020. Among other governance topics, SAFE participated in the launch of several new taskforces, which were approved by the General Assembly and will be activated in 2021.

Finally, throughout the year 2020, SAFE and members of the EU Food Policy Coalition worked on a Policy Brief concerning Agroecology and agriculture. The policy paper was published in January 2021, but is the result of a collaborative approach during the whole year 2020. It puts forward a proposal to mainstream agroecology (hence sustainable agricultural practices) into EU policies governing food systems.

Sustainable agriculture: Permaculture & Stock-Free Organic Farming

Background

Fostering sustainability and encouraging farmers to switch from intensive agriculture to more sustainable production practices falls within the broader hope to achieve sustainable food systems. Sustainability could be defined as the respect of the environment, healthier food production as well as minimum standards of living for every farmer involved in the food chain.

Sustainable food production encompasses different types of agriculture and philosophies. In 2020, SAFE hoped to promote two specific facets of sustainable agriculture, promoting **permaculture** and **stock-free organic farming**.

Permaculture is a holistic approach recreating the complexity of an ecosystem while removing motorization from crops and gathering several plant varieties with complementary properties in the smallest possible area. Permaculture reduces the pressure of farming activities on lands and increases fertility, reinforcing sustainability in farming and food production, eliminating chemical input to recreate biodiversity and reducing fossil fuels.

Stock-free organic farming is a system of cultivation that views farms as part of the wider eco-system and excludes artificial chemicals ('agrochemicals': 'pesticides', 'herbicides', 'chemical fertilizers'), as well as livestock manures, animal remains from slaughterhouses, genetically modified material and anything of animal origin.

Advocacy actions on sustainable agriculture in 2020

In 2020, the action of SAFE aimed to ameliorate the general legislative framework by setting up new policy proposals and initiatives dealing with sustainable agriculture.

In the first trimester of 2020, SAFE sent its activity report to its members. It included a whole section related to Sustainable Agriculture and Stock-Free Farming and provided important policy information for the work ahead.

In February, SAFE and other NGOs sent a joint letter to **Executive Vice-President Timmermans** calling for the reduction of meat use and the development of alternative protein products in Europe (see page 27).

At the beginning of March, SAFE contributed to the Commission's **consultation on the road map for the Farm to Fork Strategy**. In its contribution, SAFE emphasised the importance of promoting more sustainable farming practices such as permaculture and stock-free organic farming.

On 18 March, together with other NGOs, SAFE sent a **letter to European Commission President von der Leyen to call for a Farm to Fork Strategy, which would preserve biodiversity thanks to more respectful farming practices**. It was another way for us to promote sustainable farming techniques such as stock-free organic farming and permaculture.

On 14 April, SAFE and 35+ other NGOs wrote to the Commission Vice-President Timmermans, Commissioner Kyriakides, Commissioner Wojciechowski and Commissioner Sinkevicius in an **open letter underlining the importance and urgency of publishing the Farm to Fork Strategy** without further delays (by the end of April 2020), at a time where the Strategy was not published and was facing further threats of delays.

On 5 May, SAFE and 5 other NGOs (supported by 60+ local and national associations) wrote to Trade Commissioner Phil Hogan to underline the **need to maintain EU food safety standards as regards the scrutiny of genetically modified foods and crops**.

On 3 September, SAFE together with 5 NGOs (including the European Public Health Alliance) wrote to Commissioner Wojciechowski to **call for a stronger nutrition dimension of the Common Agricultural Policy**.

On 30 September, SAFE, 28 other NGOs, as well as 8 national coalitions, called for a full **alignment of the reformed CAP with the European Green Deal and its subsequent policies in a joint letter** sent to Ms von der Leyen, Ms Merkel, Mr Sassoli and the conference of Presidents of the European Parliament.

On 30 October, SAFE and 25 NGOs wrote to the Commission President von der Leyen to ask for the withdrawal of the Commission's proposal for the post-2020 CAP. The letter claimed that the current CAP and its future proposals were allowing billions of harmful subsidies and will work against the EU Green Deal.

Awareness-Raising on Sustainable Agriculture in 2020

During the 2020-year, SAFE increased the knowledge and use of the sustainable techniques that can contribute to the development and implementation of a more environmentally and climate-friendly agricultural system.

SAFE has planned a very important International Conference called « Grow Green » for June 2020, which, unfortunately, has been postponed to June 2021 due to the pandemic.

However, in 2020, SAFE organized several meetings of the Working Group on Stock-Free Organic Farming – Sustainable Agriculture created under the previous biannual LIFE programme (2018-2019). The first objective of the working group in 2020 was to prepare the International Grow Green Conference foreseen in the 2020 SGA through the aforementioned meetings and several exchanges of emails.

SAFE (thanks to its member The Vegan Society) gained access to a website to publicize the 2021 conference, creating also a logo for the conference. The work towards the organization of the conference resumed in January 2021, although minor updates regarding practical organizations were still exchanged with the Working Group at the end of 2020.

Another advocacy campaign entitled « Grow Green » was designed in September 2020 to replace the organisation of the conference. SAFE published a policy Brief and sent a joint letter to the Commission in this framework (see page 27).



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Projects on Sustainable Agriculture in 2020: Permaculture Module Project

“Undergraduate University Module in Permaculture: Creating new synergies between higher education and professionals to promote sustainable systems” project – in short, the Perma+ Module – is an Erasmus+ project under key action “Cooperation for innovation and the exchange of good practices”, which SAFE proudly coordinates since September 2019. The project also involves four partner universities (Universities of Malta, Liège, Catania and Bucharest) and two permaculture associations (Accademia Italiana di Permacultura and Institutul de Cercetare in Permacultura din Romania) from four EU countries (Belgium, Malta, Romania, Italy). This 30-month long project is aimed at designing an undergraduate module, which will involve both university researchers, teachers, and professionals in permaculture.

The module develops three central intellectual outputs:

- A curriculum, including its teaching methodology, several intensive study programmes in permaculture.
- A student handbook (available for both desktops and mobile supports) to support lectures.
- An online “Moodle” platform managed by all partners.

All these intellectual outputs have been developed by the consortium in the year 2020 and they have all been finalised, meaning that the first phase of the project is gone.

Project Consortium

safe Safe Food Advocacy Europe

Italian Permaculture Academy

Permaculture Research Institute of Romania

University of Malta

University of Liège - Gembloux Agro-Bio Tech

University of Catania

University of Agronomic Sciences and Veterinary Medicine of Bucharest

perma module

Want to bring PermaModule to your university?

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Undergraduate University Module in Permaculture

Creating new synergies between higher education and professionals to promote sustainable systems

Why Permaculture?

As our planet is facing ever-growing global environmental crises related to human societies' heavy reliance on fossil energy and overconsumption of natural resources, it is of key importance to initiate changes at multiple levels.

Permaculture is a set of principles that integrates land, resources, people and the environment through mutually beneficial synergies.

While modern industrial agriculture is largely responsible for environmental problems, Permaculture indeed offers alternatives as it is a holistic approach that encompasses a complete spectrum of regenerative concepts, systems and solutions.

What the Project Provides?

- 1 Coursebook for teachers**
A detailed curriculum containing all the relevant information for teachers to be able to deliver a Permaculture course to undergraduate students at university level.
- 2 Handbook for students**
A learning support for students taking the course with contents including main themes and theoretical points, suggested readings, assignments, guiding questions, case studies, and assessment criteria.
- 3 Online learning platform**
An interactive platform allowing easy access to the Module's materials and existing high-quality research as well as communication among participants.

About perma module

Our undergraduate course on permaculture, PermaModule, is designed for:

1 semester	2-6 ECTS
2 teachers	25 students

NO precondition

The second phase of the project, which will start in February 2021, will see the module spread to universities after two testing phases, to be taught to various student profiles in different faculties ranging from agriculture, horticulture, bioscience engineering to Economics and philosophy. The module dissemination will start in 4 partner universities. After these trials in universities, there will a section of feedbacks, which are crucial in order to improve and enhance project effectiveness.

Projects on Sustainable Agriculture in 2020: REGAGRI4EUROPE Project

Since December 2020, SAFE is also a partner in the 24-month-long “RegAgri4Europe” project coordinated by CEF International (Germany). The other partners are the Metropolitan College of Athens (Greece), the Agricultural University of Athens (Greece), Schloss Tempelhof (Germany), ACQUIN (Germany) and Skybridge Partners (Greece).

The project aims to:

1. Close the skills gap in agriculture education by providing web-based training on Regenerative Agriculture (RegAgri4Europe VOOC) for adults. The course will enable learners to apply alternative cultivation methods, therewith equipping them with the competences to respond to the challenges the agricultural sector is experiencing.
2. Inform VET authorities and policymakers about regenerative agriculture, prompting them to include teaching contents on the subject into national educational framework curricula.
3. Conduct an awareness-raising campaign on the national and EU level giving policymakers, VET providers, farmers and the general public a coherent picture of the state of the art of Regenerative Agriculture and help foster the perception about alternative farming, its benefits and the possibilities to upscale measures.

To reach these aims this project will design an innovative vocational curriculum on Regenerative Agriculture, inspired and led by permaculture, agroecology and the Regenerative Organic Certification scheme, which will make learners aware of possible solutions to implement sustainable cultivation methods, therewith giving impetus to transform agricultural practices and landscapes.

Trade and GMOs

On 5 May, SAFE together with Friends of the Earth, Corporate Europe Observatory, Greenpeace, European Coordination Via Campesina, and Slow Food Europe (with the support of many more organisations) sent a letter to TRADE Commissioner Phil Hogan regarding the EU scrutiny of GMOs.

The letter had the view of protecting European consumers from the risk of GMOs and stated that the level of scrutiny of individual GMO cannot be lowered. Specifically, instead of the speed-up of the GMOs authorisation process, SAFE and the other organisations advocated for proper implementation of the existing EU GMO legislation and more stringent legislation on GMOs in the EU.

Vegan & Vegetarian issues

Meat labelling

SAFE submitted its feedback to the European Commission on the Evaluation of the Origin-labelling for meat. In this feedback, SAFE focussed on the EU Regulation 1337/2013 on the origin labelling for fresh, chilled, and frozen meat from pig, poultry, sheep, and goat, claiming the necessity for animals' place of birth indicated and no derogation for minced meat and trimmings in the labelling rules in order to simplify the process. Moreover, SAFE advocated for the need for origin labelling for meat used as ingredients in packaged food and the compulsory labelling in minor types of meat.

Meat reduction

On 25 February, SAFE together with other NGOs sent a letter asking Executive Vice-President Timmermans to make sure that the Farm to Fork Strategy would also address the issue of extensive animal farming and its impact on the environment.

On 29 September, in the framework of its 'Grow Green' campaign and ahead of the conference to be organised in 2021, SAFE and 6 NGOs wrote again to Commissioner Wojciechowski to specifically call for more policy tools to promote legumes within the EU agricultural policies.

In October, SAFE and its member The Vegan Society published a Policy Brief entitled "Grow Green – Supporting sustainable plant-based production in the EU" ahead of the conference, which was postponed to June 2021 due to covid-19. This brief assesses the status of food production systems in the EU and advocates for greater amounts of incentives for plant proteins. The Farm to Fork Strategy and the CAP are explored as ways to do so. The brief was disseminated to several MEPs, on Twitter and to the media.

Vegan standards

On 24 November, SAFE, Assovegan, VeganOK, Vegan France, and the Vegan Society sent a joint letter to the members of the ISO Technical Committee regarding the ISO standard 23662 on the definitions and technical criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and claims.

The letter stated that the ISO standards are not in line with the vision of this delegation because of their lack of concerns regarding, for example, animal labour and GMOs using animal genes or animal by-products. Moreover, there is no compliance regarding animal testing of ingredients when required by the regulatory framework, when not conducted by a Food Business Operator (FBO), or when conducted through a third party. Thus, as no compliance criteria are defined, no independent assessment of compliance can be possible. Furthermore, vegan foodstuff cannot contain animal ingredients nor be linked with animal testing.

The “Veggie burger” case

On 14 July, SAFE and 8 NGOs wrote to the Commission Vice-President Timmermans concerning the act on the transparency of information on agricultural and food products published by France. SAFE believes that such a measure was disproportionate and could hamper the development of alternative proteins on the market, thus undermining the Farm to Fork Strategy and its call for healthier diets with reduced amounts of red meat consumed.



Similarly, on 28 August, SAFE and NGOs, as well as industry organisations, sent a joint letter to all Members of the European Parliament. The letter specifically targeted some amendments to the Commission’s proposal, which were deemed disproportionate and again hampering the development of plant-based proteins contributing to healthier diets and more sustainable agricultural practices.

On 8 October, SAFE and other NGOs wrote to the Members of the European Parliament in a joint letter. The letter argued that the reform of the CAP should not hinder the shift towards more plant-based diets and undermine the Farm to Fork Strategy.

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