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A Common Food Systems Policy is essential to bring the food systems in line with the planetary boundaries

Opinion of the Dutch Food Transition Coalition.

Contribution to the consultation regarding the Framework for Sustainable Food Systems (FSF).

With this paper, we want to support the Commission with our opinions regarding the Framework for Sustainable Food Systems. For a more effective food policy by Member States, we need a comprehensive European approach.

A Common Food Systems Policy is essential to bring the food systems in line with the planetary boundaries. “There is a growing corpus of scientific evidence that European food systems are not sustainable as they are (SAPEA 2021). Coordinated action to significantly reset the course on several different fronts is now required with some urgency” (IEEP). The amount of food waste in Europe is one of the very visible signs of a broken food system.

Last year, during the inception phase, we stressed the necessity of implementing the principles of true cost, a protein transition policy and measures to make the food environment more responsible for healthy and sustainable diets ([SustainableEUfood system –new initiative \(europa.eu\)](https://european-council.europa.eu/media/en/press-communications/infographic/infographic_sustainable_eu_food_system_new_initiative_europa.eu)).

In this paper - summarised - we want to add the following essential issues:

- A product level approach is not enough for a transition of the food system
- The Polluter Pays Principle has to be introduced in the food systems. Taxes on (i.a.) emissions of greenhouse gasses, pesticides and nitrogen are necessary.
- Binding regulations for sustainable sourcing for retail and food industry are necessary.
- The FSF supports a comprehensive approach by binding principles for all EU policies, for Member States and for all actors of the food system.

We support the opinions of the SAPEA and SAM reports (March 2020 and April 2020): “There is broad scientific consensus on *what* is needed to achieve a sustainable food system. This includes increasing or maintaining agricultural yields and efficiency while decreasing the environmental burden on biodiversity, soils, water and air; reducing food loss and waste; and stimulating dietary changes towards healthier and less resource-intensive diets”.

It's important to recognise the different approaches to speed up the transition. On product level a lot can be done (true pricing on product level, labelling, requirements for products, etc).

A systems-oriented approach should focus on a broader range of financial and fiscal interventions based on a long term view on a new Food and Agri- system in Europe. In our opinion, the product level approach has to fit in the long term view and in a more fundamental reset of the policies on international and national level.

Product level approach.

We need a European approach for sustainability standards. The JRC links these standards to transparency: "Transparency throughout the food system should facilitate data and information exchange on sustainability criteria between all relevant actors, i.e. not only between all businesses involved, but also with consumers and public authorities. A transparency system needs to be established, including harmonised definitions, rules, methods, and compatible tools".

We agree with European NGOs on the PEF methodology "that the future sustainability labelling principles defined at EU level are based on robust methodologies that provide detailed, fair and unbiased information to consumers on the environmental and social impacts of different methods of production, in line with the objectives of the Farm to Fork and Biodiversity strategies". In their letter, they have many comments on the PEF methodology. Without trust of NGO's and the consumer organisations sustainability standards will fail.

To speed up the necessary transition of the food system, more is needed than sustainability standards. The announced labelling for healthy food is necessary, but is only a small step to healthier diets.

Transition of the system

The price of food should reflect the environmental and climate effects and costs that are currently 'externalised' (IEEP).

In the current food systems, we have the wrong incentives. Incentives are focused on productivity without taking the external costs of production into account. There are not enough incentives to reduce environmental pollution, to save biodiversity, to reduce greenhouse gasses and prevent water pollution. The 'Polluter Pays Principle' (PPP) is not respected in food chains. We need financial and fiscal incentives, including EU grants, to realise a more sustainable food system.

Due to the Internal Market, the introduction of these principles on Member State level is difficult. A GHG emissions tax for agricultural production and a tax on nitrogen (compounds) and pesticides are necessary due to the heavy impact of agricultural emissions. Member States have to be challenged (by European legislation) to create pricing mechanisms for pollution (water, soil and air pollution) to reduce these emissions.

In addition, member states need to be encouraged to consider introducing fiscal policy measures to shift consumer practices towards more sustainable and healthier choices.

In the current global situation, shortages of raw materials and resources are high on the agenda. We expect that in the Framework for Sustainable Food Systems the principles of a circular economy will be introduced for food chains to limit the use of natural resources.

“Consumer choices are not typically made based only on the best available information: they are also constrained by norms and conventions, cost, convenience, and habit, and the ways in which food choice is presented. Supporting sustainable consumer choices thus requires improvements in the food environment, making sustainable choice the default choice through its availability and presentation” (SAM report 2020). We see an increasing demand for improving our food environments (e.g. spatial planning, advertising, food education): “Enhance the food environments in which consumer choices are made to encourage healthy, just, affordable and sustainable outcomes” (IEEP). A European code for food environments is necessary. People need to be encouraged to eat more healthy and sustainable diets.

Healthy and sustainable food is a human right. There is a responsibility for Member States to respect and facilitate these rights. Income problems as a result of higher food prices have to be tackled by Member States.

A transition of the food system requires a shift in diets. Due to the impact of the (too) high consumption of meat in Europe, Member States have to stimulate a shift in diets to more vegetable diets with less processed food.

Power in the food chains.

It's important to realise that the food industry and retail are the powerful players in the food chains. Due to their weak position, farmers and consumers are not able to stimulate transitions in the food chain. So, for more sustainable and healthy food we need European legislation to activate industry and retail to deliver. Legislation by which these businesses are activated to increase the degree of sustainability of their suppliers. Certification schemes can be very helpful to stimulate and qualify suppliers to raise their level of sustainability.

We support the suggestion to introduce a certification scheme on farm level as well.

We need European norms for the retail and food industry for sourcing products from certified farmers. Higher prices for products from certified farmers are necessary. By paying better prices for products delivered by farms with high qualifications on sustainability and health farmers can earn more income while contributing to environmental and other societal goals.

With legislation it's possible to increase the requirements for the retail and food businesses yearly.

The current legislation (to prevent unfair trading practices) is not sufficient for a fair distribution of the added value in the food chains. In France and Germany legislation is introduced for more fair and responsible food chains. These examples might be useful as source of inspiration for FSF .

Coherence. In the current situation there is a lack of coherence between the different European policies (trade, CAP, competition, development,) and the objectives of the F2FS. In the Framework for sustainable food systems we need guiding / binding statements for other policies.

- Trade: WTO rules are focused on free trade, while objectives of sustainability and healthy food are not fully integrated in these trade agreements. Import of cheap unsustainable food is a barrier for sustainability in the European food chains.
- The CAP and many of the NSPs are not contributing to the objectives of the Farm to Fork strategy sufficiently. There are weak rules for the conditionality requirements. There is no transparency in/ to what degree the NSPs will contribute to climate and biodiversity objectives. With the voluntary payments for cattle and sheep, there are incentives to produce more greenhouse gasses. This is a contradiction with climate policy. The CAP has to be in line with the principles of the FSF. Public money should be used for public values. Income problems of small farmers have to be solved by Member States.
- Competition. In the decisions of the Council of December 2021, the rules for competition for producer organizations are improved, but a fundamental debate on the link between competition rules and sustainability and the hierarchy between both is necessary.
- Development. The marketing budget for European producers to export to developing countries might be a problem for African producers.
- In the legislative Framework we need principles for an overall guidance for sectoral policies to stimulate healthy and sustainable production and consumption. These principles should be leading for the Commission, Member States and relevant actors. The status of the FSF should be a lex specialist, applying to all actors.
- In the Code of Conduct (2021), many aspirational targets are mentioned. These targets should be integrated in the FSF.

Governance. “Coherent governance at all levels will be crucial for the implementation and appropriate institutional structures will need to be developed (JRC)”. It’s clear that an intensive cooperation between Member States and the Commission will be necessary. The IEEP made a plea for multi-annual Action Plans of the Commission and the Member States. In the FSF, we need an obligation for Member States for a yearly reporting of progress in their food system on healthy and sustainable consumption and production. In our opinion the Commission is responsible for increasing the awareness of international bodies and governments regarding the necessity of the transition of food systems.

New arrangements are necessary to engage citizens and other actors in the decisions on food policy on local and regional level. This is very important for both the quality of the decision making and the legitimacy of food policy.

References:

SAMreportApril2020 [Towards a sustainable food system – Publications Office of the EU \(europa.eu\)](#)

SAPEA report: [A sustainable food system for the EU – SAPEA](#)

JRC report January 2022

<https://publications.jrc.ec.europa.eu/repository/handle/JRC126575>

IEEP report: [Pathways towards a legislative framework for sustainable food systems in the EU \(ieep.eu\)](#)

FOOD POLICY COALITION :

The coalition wrote a letter in March 2022 concerning the Product Environmental Footprint (PEF) methodology for agri-food products: <https://foodpolicycoalition.eu/wp-content/uploads/2022/03/Joint-letter-on-concerns-over-PEF-methodology-for-agri-food-products.-MAR-2022.pdf>