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Waterweg 64
3731 HM DE BILT

European Commission
Attn. F. Timmermans
Wetstraat 200
1049 Brussels

De Bilt, December 19, 2020

Subject: Strong transition of food system is needed

Dear Mr. Timmermans, Eurocommissioner,

The Dutch Food Transition Coalition welcomes your Green Deal and the upcoming “From farm to fork strategy” for a better food system with enthusiasm. In 2016 the Dutch Agriculture minister, Martijn van Dam, already requested a common Food and Agricultural Policy.

We fully support the vision that for a climate smart Europe in 2050 we need a comprehensive European food policy. Food systems are responsible for 20-30% of greenhouse gas emissions and for 60% of the loss of biodiversity. And we refer to the letter sent to you from three health NGO's where they mention that unhealthy diets are a main risk factor for the entire burden of mortality and disease in the European Union (1).

As the Food Transition Coalition we see this as a system failure. In the current food system food pricing does not reflect the true costs (environmental, health, societal). Unhealthy and unsustainable food is too cheap, too readily available and consumption is stimulated by (aggressive) marketing (campaigns). This results in an unhealthy and unsustainable food environment (the environment in which consumers are confronted with food in multiple ways, from marketing to offering, when they move from A to B). The purpose of public health nutrition policies is to create food environments where the healthy option is the easy, most affordable option and the default. For this we need a systems approach.

As the Food Transition Coalition we strive towards a ‘healthy living on a healthy planet’. In other words: a food system with which everyone can enjoy high quality, mainly plant based diets, where farmers are paid for producing high quality food with respect for biodiversity, reduced GHG and a circular and regenerative agriculture to deserve natural resources, space and respect for nature and in which animals are used as little as possible and where high animal welfare is the norm.

That's why we need a long term vision with a focus on a healthy and sustainable food consumption, environment/offering and production. The Farm to Fork Strategy within the Green Deal should offer a framework for other policies. We support your proposals for a strong reduction of GHG and the use of pesticides and fertilizer in the agriculture.

A Climate smart Europe in 2050 requires a comprehensive European food policy that should focus on high quality, mainly plant based diets due to the high Greenhouse gasses of animal production and the land use of feed for animal production and to support health. This should have an impact on all policies of the EU.

What do we expect from a European Food strategy?

1. Comprehensive approach

In the current situation there are contradictions between the different EU policies that are roadblocks on the path to healthy and sustainable consumption and production of food. For example:

- The CAP is still supporting the production (voluntary coupled payments) of sugar, meat, wine etc. with the result that prices of these often unhealthy products are too cheap. External costs of agricultural production are not taken into account in the CAP policy. The current CAP proposals for the next period are not delivering a climate smart agriculture. The CAP should stimulate a shift from animal production to more plant-based production due to the high GHG of beef production and the land use for the production of feed, particularly soy from South America.
- Trade agreements like the Mercosur with a cheaper import of beef, sugar and soy lower the prices of many unhealthy products. Through the cheaper import of soy animal production in Europe is stimulated with significant environmental consequences. Trade agreements should be assessed on their impact on the Paris agreement and on their health effects in Europe.
- Competition legislation is only focused on prices for consumers. Sustainability should be incorporated into this legislation.

2. Consumption of healthy food

The food-based dietary guidelines for a healthy diet are around 90% the same in all EU Member States: Eating more fruit and vegetables, a shift from animal to more plant-based proteins, eating more fibre, eating less sugar and fewer sugar drinks, eating less highly processed food and drinking more water. We need active policy to ensure these guidelines are incorporated into our daily eating patterns. This will support strategies to transition towards a future-oriented European food system less reliant on the production and consumption of meat and dairy, and more reliant on the production and consumption of diverse vegetable products. We recommend:

- A 'European Dietary Guideline' for healthy and sustainable life, based upon the existing guidelines and also taking sustainability into account
- Support the rollout and implementation of these sustainable dietary guidelines, by bringing the food environment (offering, marketing, procurement) and education closer to these guidelines

3. Food Environment

The food environment should be improved. The purpose of public health nutrition policies, also the F2F strategy is to create food environments where the sustainable and healthy option is the easy option, the most affordable option and the default. With a goal to empower people and not to restrict them.

- We need a European code for a healthy food environment:
 - Clear goals for a balanced offering of healthy products (with a minimum share of products that meet the dietary guidelines) in supermarkets, catering, and other food outlets
 - A European public procurement standard for healthy and sustainable catering.
 - Challenging the Member States to realise better urban planning limiting the number of outlets selling unhealthy food
 - Marketing rules:
 - No marketing other than in balance with the dietary guidelines and no marketing of unhealthy/highly processed food in public spaces;
 - No marketing to children of unhealthy food
 - No public support for (the marketing of) unhealthy / unsustainable products.
- A European Regulation for the composition of food. General rules on the quantity of sugar, salt, ultra-processed food and fats in products. Support Member States to introduce taxes on the unhealthy composition of food.

For meat and sugar we need a meat and sugar tax on European level. Particularly for processed meat the WCRF (World Cancer Research Fund) mentions the risks for cancer on processed meat.

Developing harmonised European guidelines for healthy food would provide opportunities for public authorities to stimulate healthy food consumption by public procurement or by creating a healthy food environment.

The European Union would have an added value by introducing a harmonised approach because individual Member States are reluctant to start with legal measures due to the open markets.

4. Support the frontrunners

In the Netherlands the Food Transition Coalition support the frontrunners (already producing healthy and sustainable food) to create a good business model. To change the food system it's necessary to demonstrate that a responsible way of producing food will be rewarded by the markets and the public authorities and the CAP. In the current situation many farmers are polluting the environment with GHG, nitrogen, pesticides, manure, fertilizers, eutrophication, loss of biodiversity and the degradation of soils. The requirements for conditionality in the new CAP proposals are not sufficient to support the shift to sustainable agriculture. Public funding needs to be targeted towards protecting public goods. CAP support should be restricted to farmers who are increasing the sustainability of their businesses.

Member States and the Commission should support frontrunners with a better exchange of experiences, research and experimental space.

To better reward frontrunners a European classification / methodology for sustainable food is necessary. With the result that farmers are stimulated by the market (and public authorities in the

beginning) to produce sustainably. And retailers have the opportunity to select high quality foods and will better be rewarded for selling these quality products.

5. Conclusion.

A European food strategy would support a transition to a healthy and sustainable food system, for a healthy and sustainable Europe in 2050. A harmonised approach will strengthen the internal market and support the Member States to realise a better food system in their own country. Many measures, such as a tax on GHG, sugar, fertilizer, beef, soy or pesticides, need leadership and concrete action on EU level.

1. <https://epha.org/joint-letter-i-farm-to-fork-needs-an-effective-consumption-strategy/>

Kind regards,

Food Transition Coalition of the Netherlands

Willem Lageweg, Joost de Jong and Natascha Kooijman

About the Food Transition Coalition

The Food Transition Coalition brings more than 200 farmers, businesses, scientists, researchers, NGO's, health institutions, the financial sector and policymakers together to realise a transition in the current agriculture and food system. Healthy living on a healthy planet, for everyone is our mission. We give voice to the frontrunners in the sector and we bring proposals at the table to speed up the transition in food and agriculture.