

Opinion of the European Economic and Social Committee on ‘Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A From Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system’

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1. Conclusions and recommendations

1.1. The Communication on ‘A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system’ aims to enhance the economic, environmental and social sustainability of food systems. The COVID-19 crisis has successfully tested the strength and resilience of the European agri-food system, and hence proven the security of food supply in the EU, but also shown that getting food ‘from farm to fork’ cannot be taken for granted. It must be seized as an opportunity to reshape supply chain dynamics and deliver lasting improvements for producers, processors and retailers.

1.2. A comprehensive EU food policy should, according to the EESC, deliver: (i) economic, environmental and socio-cultural sustainability; (ii) integration across sectors, policy areas and levels of governance; (iii) inclusive decision-making processes; and (iv) a combination of compulsory measures (regulations and taxes) and incentives (price premiums, access to credit, resources and insurance) to accelerate the transition towards sustainable food systems. The proposed strategy doesn’t reflect those objectives sufficiently.

1.3. The budget for the CAP must not be decreased or kept at the current level, but should be increased in line with those objectives. Cuts to rural development funding could be detrimental, given that it contains some of the most relevant tools for supporting the transition. While the additional EUR 15 billion proposed under the COVID-19 recovery package are welcome and necessary, they are no replacement for long-term commitments.

1.4. Approval of CAP Strategic Plans should be conditional on Member States adopting comprehensive plans to reshape the food environment that link incentives for healthy and sustainable food production with the creation of new markets for those products.

1.5. Fair food prices (reflecting the true cost of production for the environment and society) are the only way to achieve sustainable food systems in the long term. The EU and Member States should take action to ensure that farmgate prices stay above the costs of production and that healthy diets become more readily accessible. In order to do so, it will be necessary to deploy the full range of public governance tools, from hard fiscal measures to information-based approaches to make the true costs visible.

1.6. Cheap imports often imply high social and environmental costs in third countries. Without changes in EU trade policies, the objectives of the strategy will not be met. The Committee urges the EU to ensure true reciprocity of standards in preferential trade agreements.

1.7. The strategy fails to address sustainable land management and access to land. This is a major omission given that it represents one of the main obstacles to renewal of the farming population, without which the EU's basis for sustainable and productive farming will be lost.

1.8. An impact assessment should be undertaken for the different ways to achieve every target set in the strategy, taking into account the state of play in each Member State.

1.9. The option of a European Food Policy Council, as put forward in previous EESC opinions, should be explored (including its financial viability). Food policy councils already exist at local level, bringing together diverse food system actors across a specific area to resolve challenges, reconnecting cities to food production in the surrounding regions and ensuring effective governance of local and regional food policies.

2. Introduction

2.1. The European Commission's Communication on 'A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system' is a key component of the European Green Deal. It aims at contributing to Europe's climate change agenda, protecting the environment and preserving biodiversity, ensuring farmers' and fishers' position in the value chain, encouraging sustainable food consumption and promoting affordable and healthy food for all without compromising on the safety, quality and affordability of food. It is the first EU strategy claiming to encompass the entirety of the food chain.

2.2. The COVID-19 crisis has made it more urgent than ever to increase the resilience of EU and global food systems, which will be further tested by future shocks, from climate change to new disease outbreaks and labour shortages⁽¹⁾. The crisis has underlined the fact that getting food 'from farm to fork' cannot be taken for granted and has demonstrated the interconnectedness of actors and activities in agriculture and throughout the food system. It requires crisis support measures as well as steps to ensure recovery and rebuilding in the longer term. The Farm to Fork Communication and the EU Biodiversity Strategy rightly recognise the need to build post-COVID resilience by enhancing the economic, environmental and social sustainability of food systems. Turning these strategies into meaningful and timely actions is now crucial.

2.3. Farmers across the EU have already taken steps to increase sustainability and further improve standards. Farmers and food system workers (in agriculture, processing and distribution) have been on the frontlines of the COVID-19 crisis and assured an uninterrupted supply of food for all European citizens; they systematically shoulder risks while retaining a low share of the value added in the food system. In any case, farmers will necessarily be expected, also in the future, to go much further in building sustainability and resilience than has been the case to date. Given the difficult economic situation in which the great majority of farmers now find themselves, such necessary fundamental shifts can only come about if the right political and economic incentives are put in place; the EESC does not see the CAP reform proposals as taking effective steps in this direction. It is therefore imperative to ensure that the considerably better conditions are in place for food produced locally and sustainably in the EU⁽²⁾ to be competitive with regard to imports, and not only for the costs and benefits of transition to be shared equitably (between different social groups, sectors and regions, as well as between current and future generations) but also for funds to target support for sustainable farming. The Farm to Fork Strategy must be seized as an opportunity to fundamentally reshape supply chain dynamics and deliver durable improvements in farmers' incomes and livelihoods. The Committee reiterates that the European Green Deal must be a Green and Social Deal in all its components.

⁽¹⁾ COVID-19 and the crisis in food systems: Symptoms, causes, and potential solutions. Communique by IPES-Food, April 2020.

⁽²⁾ 'In order for a comprehensive European food policy to be truly relevant for European consumers, it is essential that the food produced sustainably in the EU is competitive. This means that the European agri-food sector is able to deliver food for the consumers at prices that include extra costs for criteria such as sustainability, animal welfare, food safety and nutrition but also a fair return to the farmers, and at the same time maintains its position as the preferred choice for the vast majority of consumers.' *Opinion Civil society's contribution to the development of a comprehensive food policy in the EU*, paragraph 5.8 (OJ C 129, 11.4.2018, p. 18).

2.4. As far as imports of raw agricultural products and foodstuffs are concerned, the EESC would have expected the F2F strategy to have made as clear a statement as the one the Commission made when announcing a carbon border adjustment for industrial products, since our farmers (and consumers) must be protected from imports that do not meet European sustainability criteria — all the more so since it is clear that our current standards need to be raised. However, the F2F completely fails to do this.

2.5. The EESC welcomes the release of the Farm to Fork Strategy, which represents a crucial opportunity to achieve the objectives described above. In this opinion, the Committee identifies some gaps in the Farm to Fork Communication and Action Plan (*vis-à-vis* the ambitions of the European Green Deal and the Committee's own proposals for a comprehensive food policy⁽³⁾) and provides guidance on how the Farm to Fork Strategy can be taken forward and translated into an effective roadmap for transition.

3. The foundations of an effective Farm to Fork Strategy: governance, accountability, objectives and resources

3.1. Since 2016, the EESC has been calling for the development of a comprehensive food policy in the EU, with the aim of providing healthy diets from sustainable food systems, linking agriculture to nutrition and ecosystem services and ensuring supply chains that protect public health for the whole of European society⁽⁴⁾. A broad civil society coalition has also come together to co-develop a detailed blueprint of a 'Common Food Policy' for the EU, in a three-year process led by IPES-Food⁽⁵⁾.

3.2. In line with the recommendations in the above-mentioned texts, a comprehensive EU food policy should deliver: (i) economic, environmental, and socio-cultural sustainability; (ii) integration across sectors, policy areas and levels of governance; (iii) inclusive decision-making processes; and (iv) a combination of compulsory measures (regulations and taxes) and incentives (price premiums, access to credit, resources and insurance) to accelerate the transition towards sustainable food systems. It should accelerate the development of a circular economy and reduce the environmental impact of the food processing and retail sectors by taking action on transport, storage, packaging and food waste. It should also be equipped to address the new situation post COVID-19, in particular the need to improve crisis management and reinforce safe and fair working conditions across the chain.

3.3. While the Farm to Fork Communication and Action Plan identifies many relevant tools, it lacks effective governance mechanisms. Firstly, actions must be grouped under a set of overarching, goal-oriented objectives that describe the food systems the EU hopes to put in place in the medium- and long-term⁽⁶⁾. Rather than addressing specific parts of the chain, these objectives must be cross-cutting⁽⁷⁾. This is essential in order to: (i) highlight the need for whole-of-chain approaches and fair cost-sharing to address the challenges in agriculture; (ii) allow for different solutions to be prioritised and avoid an 'à la carte' approach where incompatible solutions are included; (iii) ensure that alternative measures (with equivalent effects) are introduced in the event of initially-planned actions being delayed or derailed; (iv) ensure that quantitative and qualitative targets are accompanied by the full suite of measures required to meet them (and that they are thus feasible), and add further targets if required to meet the stated objective; and (v) provide a robust basis for ensuring alignment of different sectoral policies (e.g. CAP, trade, environment, health development and food safety) with the Farm to Fork Strategy.

3.4. To be effective, the Farm to Fork Strategy needs to be accompanied by a clear framework with targets, indicators and a robust monitoring mechanism, but without increasing bureaucracy. The EESC has already recommended the development of an EU sustainable food scoreboard, which would allow food system challenges to be addressed through a multi-year

⁽³⁾ OJ C 129, 11.4.2018, p. 18.

⁽⁴⁾ See footnote 3.

⁽⁵⁾ IPES-Food, *Towards a Common Food Policy for the European Union*, Brussels, IPES Food, 2019.

⁽⁶⁾ Specific objectives of relevance for a comprehensive strategy, and the types of action required to meet them, are detailed below, drawing on opinions developed by the EESC.

⁽⁷⁾ One exception in the Farm to Fork strategy is the reference to achieving 'healthy and sustainable diets'; while this objective is goal-oriented, it is positioned as a consumer imperative rather than emphasising the need to address it along the whole chain.

approach, thereby promoting policy alignment at different levels of governance. The scoreboard would provide indicators and would thus encourage and monitor progress towards meeting the targets that have been set ⁽⁸⁾.

3.5. An effective Farm to Fork Strategy should reduce costly externalities from agriculture and ensure that all farmers are fairly remunerated by markets; it will therefore be highly cost-effective in the longer term. However, the transition to sustainable and competitive food systems requires urgent investment. In particular, major efforts and capital investment are required to achieve the levels of climate and environmental action identified in the European Green Deal and to help farmers to implement sustainable approaches. These goals cannot be achieved if key funding flows are interrupted. Cuts to rural development funding could be detrimental, given that it contains some of the most relevant tools for supporting transition, as noted in the Farm to Fork Communication. The Committee also reiterates the importance of earmarking EUR 10 billion for research on agriculture, rural development and the bioeconomy, as provided for by the European Commission in its proposals for the 2021-2027 Multiannual Financial Framework (MFF). While the additional EUR 15 billion for rural development and agri-food research proposed under the COVID-19 recovery package are welcome and necessary, they are no replacement for long-term commitments.

3.6. A wide range of stakeholders across food systems have a role to play in overseeing the development and implementation of the Farm to Fork Strategy. While improved cooperation between existing bodies should be prioritised, a dedicated multi-stakeholder governance structure will be required. In exploring options, it should be ensured that the new governance structure: (i) adopts democratic and inclusive approaches in line with best practice in current bodies, notably the Multi-stakeholder Platform on the SDGs; (ii) has a clear mandate that includes consideration of how well sectoral policies like the CAP are aligned with the Farm to Fork Strategy; and (iii) includes strong and diverse representation of farming groups, civil society (including EU, national and grassroots organisations) and supply chain actors. The situation must be avoided whereby agricultural interests engage only on CAP, and civil society only on the Farm to Fork Strategy: tensions must be confronted and a pathway to transition agreed by all actors.

3.7. The option of a 'European Food Policy Council' ⁽⁹⁾, as put forward in previous EESC opinions, should be explored (including its financial viability). A European Food Policy Council should be consulted on the implementation of the Farm to Fork Strategy. It should be created as soon as possible. Food policy councils already exist at the local level, bringing together diverse food system actors across a territory to resolve challenges, reconnecting cities to food production in the surrounding regions and ensuring effective governance of local and regional food policies ⁽¹⁰⁾. As the COVID-19 crisis has shown, resilient supply chains depend on effective action at the local level, where civil society can work with state and commercial partners to plug the gaps in food provisioning ⁽¹¹⁾. A European Food Policy Council would accelerate the alignment of policies at EU, national and local levels (i.e. multi-level governance). It would bring together representatives of local food policy councils and stakeholders from civil society and across the supply chain (including farmers, workers and consumers), providing a platform for stakeholders to learn from each other through the sharing of good practice; ensuring that all points of view from the various sectors are taken into account; and identifying obstacles to the promotion of sustainable food at local level.

4. Key areas where further action is required

4.1. *Healthy and sustainable diets*

4.1.1. Healthy and sustainable diets represent a key pillar of a comprehensive food policy, as we urgently need to reorient our diets in order to improve — the health of both ecosystems and the public, and the vitality of rural territories ⁽¹²⁾. The Farm to Fork Communication recognises the need to ensure that healthy and sustainable options are the

⁽⁸⁾ See footnote 3.

⁽⁹⁾ This new body would function as a platform hosted by existing institutions.

⁽¹⁰⁾ Processes to reconnect cities to their nearby food production areas are under way in many places (e.g. Milan in Italy, Montpellier in France, Ghent, Brussels and Liege in Belgium and Toronto in Canada) and are likely to accelerate in the wake of COVID-19.

⁽¹¹⁾ COVID-19 and the crisis in food systems: Symptoms, causes, and potential solutions. Communique by IPES-Food, April 2020.

⁽¹²⁾ OJ C 190, 5.6.2019, p. 9.

easiest options for consumers (i.e. widely available and affordable to all), and acknowledges that 'food environments' shape people's choices.

4.1.2. The Farm to Fork Strategy could offer a unique opportunity to reshape food environments, which requires a number of different policies to be aligned on the supply- and demand-side, and at EU, national and local levels, including steps to: (i) tackle unhealthy marketing and advertising through regulatory action; (ii) ensure easy-to-use, reliable and independent consumer nutrition information; (iii) introduce healthy pricing policies; (iv) support sustainable public food procurement; (v) drive product (re)formulation; (vi) create healthy retail, restaurant, urban and school environments; and (vii) invest in consumer education. These steps must be complemented by social policies to ensure that low income and disadvantaged groups have increased access to healthy and sustainable diets.

4.1.3. However, the Farm to Fork Communication and Action Plan fails to outline comprehensive action across these policy areas and relies on codes of conduct, pledges and other self-regulation tools⁽¹³⁾ that have proven ineffective to date. The European Commission's plan to make recommendations to Member States (in the remit of CAP Strategic Plans) on how to meet the objectives of the CAP and Farm to Fork Strategy, including health objectives, is welcome. However, action on diets cannot be optional. Approval of CAP Strategic Plans should be conditional on Member States adopting comprehensive plans to reshape the food environment that link incentives for healthy and sustainable food production with the creation of new markets for those products. This would also be in line with the Commission's commitment to promote production and consumption of organic foods.

4.1.4. With regard to the provision of reliable nutrition information and guidance, the EESC has called for the development of new Sustainable Dietary Guidelines that take into account cultural and geographical differences between and within Member States. Sustainable Dietary Guidelines would help create a clearer direction for farms, processors, retailers and the catering industry, and the agri-food system would benefit from a new framework to produce, process, distribute and sell healthier and more sustainable food at a fairer price⁽¹⁴⁾.

4.2. *A fair food supply chain with fair prices*

4.2.1. The EESC has already urged a ban on all Unfair Trading Practices (UTPs)⁽¹⁵⁾. The food supply chain is particularly vulnerable to UTPs, due to strong imbalances between small and large operators and between producers with long-term engagements and more flexible traders. A regulatory approach and a legislative framework with effective and robust enforcement mechanisms is the way UTPs can be effectively addressed at EU level.

4.2.2. The Farm to Fork Communication rightly recognises the essential work done by farmers and workers along the food chain (including those working under precarious conditions), and the need to ensure their health and safety in line with commitments under the European Pillar of Social Rights. However, the Committee regrets that this is not accompanied by concrete steps in the Action Plan. Furthermore, the EESC regrets the failure to link fair conditions to fair food prices, and considers that fair food prices (reflecting the true cost of production for the environment and society) are the only way to achieve sustainable and equitable food systems in the long term. Currently, big retail and multinational processors are making the highest profits while farmgate prices are too low to guarantee farmers' livelihoods and decent working conditions, and often do not even cover production costs. The share of EU food chain value going to farmers dropped from 31 % in 1995 to 24 % in 2005⁽¹⁶⁾, and has more recently been estimated at around 21 %⁽¹⁷⁾. The compression of farmgate prices has been allowed to occur, based on a narrow interpretation of EU competition law, whereby consumer welfare is equated with the lowest possible price. This must be changed, including in the EU Treaties.

⁽¹³⁾ The Farm to Fork Communication states that the European Commission will 'seek commitments from food companies and organisations to take concrete actions on health and sustainability'.

⁽¹⁴⁾ See footnote 12.

⁽¹⁵⁾ OJ C 440, 6.12.2018, p. 165.

⁽¹⁶⁾ European Parliament, Report on fair revenues for farmers: A better functioning food supply chain in Europe, 2009/2237(INI), 2009, <http://www.europarl.europa.eu/sides/getDoc.do?type=REPORT&reference=A7-2010-0225&language=EN>

⁽¹⁷⁾ European Parliament, 'Parliamentary questions — Answer given by Mr. Hogan on behalf of the Commission', February 27, 2015, http://www.europarl.europa.eu/doceo/document/E-8-2015-000521-ASW_EN.html?redirect

4.2.3. In the remit of the Farm to Fork Strategy, the EU and Member States should take comprehensive action to ensure that farmgate prices stay above the costs of production, and that healthy and sustainable diets become relatively more affordable and available. In order to do so, it will be necessary to deploy the full range of public governance tools, from hard fiscal measures to information-based approaches to make the true costs visible, drawing on the best emerging methodologies for true cost accounting⁽¹⁸⁾. The EESC reiterates the importance of investing in education on sustainable diets from an early age, to help young people appreciate the value of food and fair prices. Special attention must be paid to vulnerable groups, especially elderly and low-income populations. New forms of labelling that show the share of value going to farmers should also be explored. All steps affecting prices should be carefully sequenced to avoid rapid shifts, and accompanied by the monitoring of impacts on low-income families⁽¹⁹⁾ to ensure that their access to healthy diets increases, not decreases, as a result of policy interventions.

4.2.4. Farmers' markets, Community Supported Agriculture (CSA), consumer cooperatives and other short supply chain initiatives provide a crucial avenue for farmers to increase added value and receive fair prices, particularly for those practising organic farming or applying other environment-friendly methods that are not covered by a label. Local and regional authorities are often involved, putting local food governance systems in place that bring together the various players concerned and, in particular, fostering the use of local produce in mass catering. The EESC deplors that its previous opinions have not been followed by the Commission in this regard.

4.2.5. This re-localisation fosters jobs and local dynamism. It also increases resilience, as shown by responses to COVID-19 at all levels of the supply chain (producers, processors and retailers). Rural areas are one example of a domain where consumer cooperatives are usually the last business operator standing. For consumers, short supply chains offer a source of fresh, high-quality produce that is enriched by its history and the human relations involved, and acts to stimulate interest and educate people about the value of food, as well as rebuilding trust in food systems⁽²⁰⁾. Solidarity-based, cooperative initiatives also play a key role in developing education materials for schools and vigorous awareness-raising to combat food waste and obesity, especially among children. While the benefits of short supply chains are recognised in the Farm to Fork Communication, concrete actions and allocations of funding (including in CAP strategic plans) are required to further develop these chains and remove all barriers to their flourishing across the EU.

4.3. Strengthening the external dimension of the Farm to Fork strategy

4.3.1. Without changes in EU trade policies, the objectives of the Farm to Fork Strategy will not be met. The Farm to Fork Communication and Action Plan includes important steps to strengthen the sustainability provisions of the EU's bilateral Free Trade Agreements (FTAs) and the enforcement of those rules. However, as noted by the French and Dutch authorities⁽²¹⁾, more can be done to ensure compliance with international agreements, and to streamline the procedures for notifying and acting on breaches of sustainability commitments. Furthermore, the Committee urges the EU to ensure true reciprocity of standards in preferential trade agreements, particularly regarding welfare, sustainability, and traceability from farm to fork, building on and mainstreaming what has been achieved in some recent bilateral provisions⁽²²⁾. A Carbon Border Tax, as mandated in the Mission Letter to the Executive Vice-President-designate for the European Green Deal⁽²³⁾, remains essential to prevent EU farmers and food companies being undercut by imports from countries that fail to take climate mitigation seriously. Silence on the Carbon Border Tax, carbon pricing and GHG monitoring of imports is therefore regrettable and severely undermines the ambitions of the Farm to Fork Strategy and the Green Deal.

⁽¹⁸⁾ <http://www.fao.org/nr/sustainability/full-cost-accounting/>

⁽¹⁹⁾ See footnote 12.

⁽²⁰⁾ OJ C 353, 18.10.2019, p. 65.

⁽²¹⁾ Non-paper from the Netherlands and France authorities on trade, social economic effects and sustainable development.

⁽²²⁾ For example, duty-free access to EU markets for eggs was made conditional on alignment with EU hen welfare standards for the first time in the EU-Mercosur FTA: <https://www.theguardian.com/environment/2019/oct/02/eu-imposes-hen-welfare-standards-on-egg-imports-for-first-time>

⁽²³⁾ https://ec.europa.eu/commission/sites/beta-political/files/mission-letter-frans-timmermans-2019_en.pdf?fbclid=I-wAR3MP8zmxW1jBVJhtBUtP2PKkEct5ibFjKVTCoaxgRX6thxcdsYlXhTPIk

4.3.2. The Farm to Fork Communication fails to acknowledge the impact of EU exports on small-scale producers in developing countries, or the role of EU-based multinational companies in contributing to unsustainable practices around the world. New enforcement capabilities must be first and foremost directed at EU-based companies, who must be accountable for ensuring that their supply chains are free from deforestation, land-grabs and rights violations. The EESC therefore welcomes Justice Commissioner Reynders' commitment to introduce binding Human Rights and Environmental Due Diligence requirements for EU companies, and calls for additional sector-specific measures to be considered in the remit of the Farm to Fork Strategy. As noted by the European Parliament ⁽²⁴⁾, due diligence obligations are particularly urgent for operators in 'forest-risk commodity' supply chains (e.g. beef, soy, palm oil).

4.3.3. Most importantly, the Farm to Fork Strategy fails to acknowledge the circularity of global agricultural markets and the reciprocal influence traded volumes exert on both the importing and the exporting country. It represents a crucial opportunity to reset the EU's external objectives, in line with the ambitions of the European Commission's 'Trade for All' Communication ⁽²⁵⁾. This long-term reflection is missing from the Farm to Fork Communication. FTAs continue to drive unsustainable consumption growth, with a huge environmental impact in third countries — particularly deforestation ⁽²⁶⁾. It is necessary to challenge the continuing expansion of trade volumes as the ultimate goal of EU policy (particularly in high GHG-emitting sectors, and in the strategic sectors requiring a diversity of robust chains in the wake of COVID-19). It is also essential to find new ways of raising standards, promoting sustainable practices and ensuring that new opportunities for sustainable production can be harnessed by small-scale farmers in the EU and developing countries. These reflections should be pursued in multilateral fora such as the UN Committee on World Food Security (CFS) and Codex Alimentarius, rather than be limited to bilateral negotiations, where farmer and civil society participation is limited, power imbalances are significant, and trade liberalisation remains the ultimate goal. The planned legislative framework on sustainable food systems can provide a starting point. First and foremost, it must serve to establish a clear definition of sustainable food systems, in line with existing EU definitions of environmental sustainability ⁽²⁷⁾.

4.4. *Supporting farmers in making the transition to resilient, diverse, agroecological systems*

4.4.1. The Farm to Fork Communication and Biodiversity Strategy include crucial steps to rebuild and protect soil and agro-ecosystems, notably targets for the agricultural area under high-diversity landscape features (10 %) and land under organic farming (25 %). However, the starting position of different Member States should be considered. The Farm to Fork Communication fails to address sustainable land management and access to land. This is a major omission given that it represents one of the main obstacles to renewal of the farming population, without which the EU's basis for sustainable and productive farming will be lost. The EESC has proposed an EU framework aimed at protecting agricultural land in the Member States that is valuable for food production ⁽²⁸⁾. However, these commendable purposes would need an adequate financial support that is lacking in the current budget proposals. Likewise, the Communication does not give guidance on how the demand for organic products should be further increased. The target for landscape features will be very costly for some farmers to meet. The EESC calls for an impact assessment on the implementation of this goal.

4.4.2. The EESC considers that agroecology is the horizon towards which European agriculture should be working ⁽²⁹⁾, requiring a paradigm shift that builds up diversity at all levels (species, farms, landscapes and livelihoods). As a science, a technique and a social movement, agroecology looks at the food system in its entirety and seeks to bring producers closer to their environment by safeguarding and even restoring the complexity and wealth of the agro-eco-social system. However,

⁽²⁴⁾ European Parliament, European Parliament resolution of 11 September 2018 on transparent and accountable management of natural resources in developing countries: the case of forests, 2018/2003(INI).

⁽²⁵⁾ https://trade.ec.europa.eu/doclib/docs/2015/october/tradoc_153846.pdf

⁽²⁶⁾ https://ec.europa.eu/environment/forests/impact_deforestation.htm

⁽²⁷⁾ This definition can build on and align with the definition of environmental sustainability enshrined in the European Commission action plan on financing sustainable growth.

⁽²⁸⁾ Land use for sustainable food production and ecosystem services (OJ C 81, 2.3.2018, p. 72).

⁽²⁹⁾ See footnote 20.

the Farm to Fork Communication still treats agroecology as a niche option, to be supported among other options through research policies and CAP eco-schemes. It therefore fails to identify the need to redesign and re-diversify agriculture across the EU, despite the need for such a shift to occur in order to achieve the stated targets and goals of the Farm to Fork Strategy and Biodiversity Strategy (including pesticide, fertiliser and antibiotic reduction targets).

4.4.3. The EESC also urges that more to be done to study and promote other farming methods that increase biodiversity and reduce input use, in addition to the development of organic farming described above. This may also include the promotion of precision farming, while bearing in mind the high investment costs; these alone will not be able to be covered by many small and medium-sized farms. The potential of resource-, soil- and environment-friendly farming methods can be realised through the integration of soil, fertiliser, pesticide and yield data, which requires better access to data contained in national databases, greater mobility and greater user-friendliness, etc. The use of information and communication technologies should be promoted.

4.4.4. In light of COVID-19, it is more urgent than ever to restructure the livestock sector in a way that reduces its vulnerabilities and its impact on workers, the environment and animal welfare. The Farm to Fork strategy will in no way be able to meet this challenge. It would have to devise and include steps to reduce the reliance on imported protein feed and to reintegrate livestock into mixed agroecological systems. For years, political circles in Europe have been philosophising about a 'European protein strategy', but nothing has actually happened. On this matter too, the F2F strategy says too little and any references it makes are not binding enough. It completely fails to reflect on what the oft-praised principle of the circular economy would mean for European agriculture. The EESC wonders, for example, how the huge quantities of feed imports from, for example, South America, which are also partly responsible for the dire deforestation of rainforests, are compatible with the circularity principle.

4.4.5. The Farm to Fork Communication does not provide enough detail on how farmers will be supported in adopting new practices. While transition-based payments under eco-schemes would require major funding to meet the new ambitions, the income support function of CAP payments is vital and will remain so for years to come, even as steps are taken to ensure that food prices reflect the true costs (see 4.2). Advisory services will need to be well resourced to accompany farmers in major production shifts. If the objectives of the European Green Deal and F2F are to be met, the budget for the CAP must not be decreased or kept at the current level, but should be increased in line with those objectives. Costs related to the objectives of the European Green Deal go far beyond the current programming period. It should be clarified what the financial demands on future national budgets will be in order to fulfil the actions of European Green Deal and meet the targets/indicators of the European Green Deal.

4.4.6. The Farm to Fork Communication rightly notes the need to account for Member States' different starting points. Practices vary greatly in terms of farm intensity per hectare, stocking density per hectare, use of pesticides, fertilisers and antibiotics per hectare and per animal, and animal welfare. An impact assessment should be undertaken for every target set in the European Green Deal and F2F Strategy, taking into account the different state of play in Member States. However, the EESC also underlines the need for a level playing field between Member States and requests more clarity on how the risk of diverging standards will be addressed through implementation of the Farm to Fork Strategy and the CAP strategic plans, and in what timeframes. The Committee considers that tailored approaches should apply to the speed of transition but not the ultimate targets and goals to be reached.

Brussels, 16 September 2020.

The President
of the European Economic and Social Committee
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