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DIRECTORATE-GENERAL

CLIMATE ACTION

Directorate C – Climate strategy, governance and emissions from non-trading sectors

The Director

Brussels, 13 March 2020

NOTE TO SABINE JUELICHER, DIRECTOR, DG SANTE

**SUBJECT: REPLY BY ARTUR RUNGE-METZGER, DIRECTOR, DG CLIMA
TO THE INTERSERVICE CONSULTATION LAUNCHED BY DG SANTE**

Deadline: 13/03/2020

[REDACTED]

Title: FARM TO FORK STRATEGY

Reply: POSITIVE OPINION WITH COMMENTS

Contact persons:

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(e-signed)
Artur Runge-Metzger

COMMENTS

Subject: Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions on the Farm to Fork Strategy for a Sustainable Food System

Ref. ISC/2020/01398

Thank you for consulting DG CLIMA on this document, which is the final outcome of an inclusive process during which many of our remarks and proposals have already been taken on board.

DG CLIMA particularly welcomes the clear link with the Climate Law and the 2050 climate neutrality objective, as well as the emphasis on the threat that climate change poses to food systems. However, we would still like to take this opportunity to provide a last set of comments that we hope will be integrated in the final Communication. This cover note summarises our main comments; the Annex lists suggestions on how to integrate these and other comments in the text.

1. DG CLIMA AS LEAD DG ON CARBON FARMING

We appreciate the emphasis on carbon removals as a new business model for farmers. However, we suggest more open wording in line with the Circular Economy Action Plan (CEAP). Instead of ‘Carbon Farming’, we would prefer to refer to ‘Certification rules for carbon dioxide removals’.

This work will build on a study that we are currently carrying out on Carbon Farming and continue in the next months with other studies and pilot projects. As explained in the CEAP, DG CLIMA will consider how to frame the contribution of carbon dioxide removals that will result in a legislative proposal in 2023. For these reasons, we believe that the lead DG for this action should be DG CLIMA, while DG AGRI can have a role as co-lead when it comes to promoting the use of pilot carbon farming programmes under the CAP Strategic Plans (e.g. for eco-schemes).

2. PROVIDE A MORE COMPLETE PICTURE OF ADAPTATION-RELATED ASPECTS

The effects of climate change on the food system are mentioned in a couple of places with useful references, for instance, to the need to ensure sufficient supply of quality seeds and plant varieties adapted to climate change. There are a few areas where however it would be useful to refer to climate impacts and resilience. For instance, while acknowledging that climate change impacts agriculture in third countries, the strategy fails to mention or reflect upon possible EU supply chain disruptions or on the adverse impact on the quantity or quality of food products from particular geographical indications. The effects of climate change on fish stocks also calls for more accurate wording (see Annex).

3. PROVIDE A BALANCED VIEW OF HUNGER VS OBESITY

A paragraph in section 1 refers to food insecurity, increasing global population, hunger (affecting 820 million people), and a need to increase global food availability by 50% between 2012 and 2050. As highlighted in the IPCC Special report on Land and Climate Change, already today hunger and obesity co-exist: over 2 billion people globally are overweight. These two figures should be quoted together to avoid giving the impression that producing and consuming more food is the universal solution. As the FAO report quoted in the footnote states, food availability in low and middle income countries can improve even if globally expansion of production is restrained, if high income countries were to consume fewer animal products, and food waste and loss were considerably reduced. We could not find the 50% figure in the FAO report quoted in the footnote so we suggest to delete it.

4. THE TARGET ON FERTILISERS SHOULD BE ABOUT NUTRIENT USE EFFICIENCY

Reducing the use of fertilisers can have a significant impact on reducing nitrous oxide emissions from the agricultural sector. The global warming potential of nitrous oxide is more than 200 times more powerful than carbon dioxide. As correctly stated in the Strategy, the problem is the *excessive* use of fertilisers and organic manure. The target could therefore be expressed, for instance, in terms of improving the full-chain Nutrient Use Efficiency, defined as the ratio of nutrients in final products (e.g., human food consumed) to new nutrient inputs (ref. Our Nutrient World, Global Partnership on Nutrient Management, 2013) – or similar concepts. The paragraph should also explicitly mention some relevant practices that should be encouraged via, for instance, CAP Strategic Plans like precision farming, nitrification inhibitors, recycling of organic waste into renewable fertilisers.

5. THE PARAGRAPH ON LIVESTOCK PRODUCTION SHOULD POINT AT THE RISING TREND IN METHANE EMISSIONS

We welcome that the Strategy clearly refers to the role of the livestock sector in producing GHG emissions, and stresses the need for balanced and less meat-intensive diets and R&I support to alternative proteins and meat substitutes. To reinforce the importance of these arguments, we would like the strategy to stress that methane emissions from livestock have been increasing since 2012, and that this trend must be reversed as soon as possible.

6. STRESS THE IMPORTANCE OF ADVISORY SERVICES AND DATA FOR CLIMATE ACTION

The proposals regarding enhanced advisory services and a European agricultural data space are welcome, but more precise reference should be made to how they can support a more climate-friendly agriculture at the farm-level and more integrated land use planning at the policy level.

7. GIVE MORE PROMINENCE TO INDUSTRY PLEDGES

The paragraph on seeking commitments from companies to adopt responsible business and marketing practices is welcome, but we suggest to move it up in the section (now it is the last paragraph) to give it more prominence.

Annex - suggested changes to the text

	Suggested change	Reason
Title – cover page	<i>A Farm to Fork Strategy For <u>an environmentally-friendly, healthy and fair</u> food system</i>	The order of the adjectives in the title should follow the order in which the objectives are presented in the Strategy.
Section 1	The paragraph “To deliver on the Green Deal (...) key objective to achieve” should be moved up just after “...and produce GHG emissions.” and before “The Climate Law...”	That paragraph is a broad statement that should logically come before the more specific paragraphs related to climate, biodiversity, etc.
	“In the European Union, 71% of farmland is dedicated to meat and dairy production and nearly 60% of the European Union agricultural GHG emissions come from the animal sector.”	Correction proposed in order to ensure that references to animal sector share of GHG emission are consistent across the document. Section 1 referring to less than half, and section 2.1 refers to nearly 60%
	“The Climate Law sets out the objective for a climate-neutral Union in 2050”.	This is more in line with the published Climate Law proposal.
	“While 820 million people presently suffer from hunger, changes in consumption patterns have contributed to about 2 billion adults now being overweight or obese*; the FAO estimates that sustainable global food systems may restrain total agricultural output while improving per capita food availability in low- and middle-income countries. To achieve this, dietary patterns of high-income countries need balancing**.”.	Only mentioning the hundreds of millions of people that are undernourished gives the false impression that food production would need to be drastically increased; yet, as the IPCC Special Report on Land makes clear, the scale of obesity is even larger. The challenge is also to move to more sustainable consumption patterns and reduce food waste, not necessarily produce more food. We deleted the 50% figure because we could not find it in the quoted report. We replace it with text from the same report that seems to provide a good linkage with the next paragraph.

	<p>*Footnote: IPCC Special Land Report</p> <p>**Footnote: FAO report, “The future of food and agriculture”</p>	For the EU level, this concept is correctly explained in the next paragraph.
	“Overall, the diets of European Consumers are not in line with dietary recommendations; if they were, the environmental footprint of food systems would also be significantly reduced.”	The paragraph on diets should mention that healthier diets go hand in hand with a lower environmental footprint.
	“On one hand, imports of certain commodities may however result in negative environmental and social impacts in third countries like deforestation [...]. On the other hand, their production is also vulnerable to the effects of climate change, and extreme weather events in these countries may result in supply chain disruptions in Europe. Therefore, efforts to increase the sustainability requirements of the EU food system should be accompanied by policies helping to progressively raise standards globally, in order to avoid the externalisation and export of unsustainable practices and by policies supporting third countries climate-proof their agriculture.”	<p>As the EU is the largest importer and exporter of agri-food products and as agriculture imports are mainly primary products.</p> <p>Alternatively this point could be mentioned in section 3.3 promoting the global transition.</p>
Section 2	“Ensuring food security and citizens’ health: (...) quality, while...”	“plant and animal health” is part of both the first and the second objective
	“To achieve <u>an environmentally-friendly, healthy and fair</u> food system, an integrated...”	The order of the adjectives should follow the order in which the objectives are presented in the Strategy.
Section 2.1	“A promising example of new green business models is carbon sequestration by farmers and foresters. Farming practices that remove CO2 from the	We are glad to see such a prominent role for an action that DG CLIMA has proposed. The new suggested wording reflects a similar paragraph that was

	atmosphere contribute to the climate neutrality objective and should be rewarded, either via CAP payments or via other public or private initiatives. To this end, the Commission will explore the development of a regulatory framework for the certification of carbon removals based on robust and transparent carbon accounting to monitor and verify the authenticity of carbon removals (cf. new CEAP)..”	included in the Circular Economy Action Plan.								
	Footnote 13: “Fertilisers, both organic and inorganic, (...), account for more than 3% of EU GHG emissions. UNFCCC...”	<p>Please provide figures on emissions from fertilisers based on EU reporting to the UNFCCC. Here are some similar figures for the EU in 2017 (extracted from https://di.unfccc.int/flex_annex1), and the share of N2O emissions from soils amount to around 3.1% of total GHG emissions (1.2% if we look at inorganic fertilisers only).</p> <table><tr><th>Category \ Unit</th><th>kt CO₂ equivalent</th></tr><tr><td>Total GHG emissions without LULUCF</td><td>4.323.163,15</td></tr><tr><td>3.D.1 Direct N₂O Emissions From Managed Soils</td><td>134.278,79</td></tr><tr><td>3.D.1.a Inorganic N Fertilizers</td><td>53,180.44</td></tr></table>	Category \ Unit	kt CO ₂ equivalent	Total GHG emissions without LULUCF	4.323.163,15	3.D.1 Direct N ₂ O Emissions From Managed Soils	134.278,79	3.D.1.a Inorganic N Fertilizers	53,180.44
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	<p>“The Commission will take action to improve by XX% the full-chain nutrient use efficiency by 2030.”</p> <p>“...to foster a more widespread application of nitrification inhibitors, precise fertilisation techniques and sustainable agricultural practices, and recycling of organic waste into renewable fertilisers, including</p>	<p>Paragraph on nutrient management: the first lines correctly state that the problem is the excessive use of nutrients, and not the use of nutrients in itself. Thus, the target should, for instance, be expressed in terms of reducing the excessive use of fertilisers / improving nutrient use efficiency.</p> <p>Concretely, this implies that more farmers take up precision farming techniques and nitrification inhibitors. These two technologies have been shown to have the largest mitigation potential in our Long-Term Strategy for climate neutrality (In-depth analysis in support of COM(2018) 773, p. 162). Recycling organic waste into renewable fertilisers is also a promising measure</p>								

	through the measures in the CAP strategic plans.”	that is coherent with a circular economy. The rest of the paragraph could include more concrete actions to support these technologies.			
	Footnote 15: “ <i>Annual European Union approximated greenhouse gas inventory for the year 2018</i> . EEA Report. No 16/2019. These figures do not include CO2 emissions from land use and land use change.”	The footnote should clarify that these emissions do not include CO2 emissions from land use, which are reported under the Land Use, Land Use Change and Forestry sector.			
	EU agriculture is responsible for 11% of EU GHG emissions out of which nearly 60% are methane emissions from livestock production; these emissions have been constantly rising since 2012, and this trend must be reversed.		3.A Enteric Fermentation	3.B Manure Management	Total
		2012	189.029,46	41.050,07	230.079,53
		2013	189.947,71	40.601,10	230.548,81
		2014	192.057,37	41.608,08	233.665,45
		2015	193.699,52	41.904,81	235.604,33
		2016	194.495,20	41.881,82	236.377,03
		2017	194.929,08	42.120,00	237.049,08
	To reduce the environmental and climate impact of animal production, in addition to providing support via the CAP budget, the Commission will facilitate the placing on the market of sustainable and innovative feed additives that help reduce water and air pollution and methane emission of livestock farming.	Carbon footprint and methane emissions in these case are synonymous, as feed additives reduce methane emissions and no other GHG.			
	“It will also examine EU rules to replace feed materials that are sourced in an unsustainable way (e.g. soya from deforested land) with more sustainable ones such as...”	The expression “critical feed material” is unclear. What is critical in the example provided is the way that feed is sourced, not the feed itself.			
	“A review of the promotion programme (...)”	This action seems more relevant for section 2.3 as it is about better			

	consumption”.	information to promote sustainable diets.
	“The Commission will also ensure that granting coupled income support is aligned with the objective to improve the sustainability of milk and milk products, sheep meat and goat meat, beef and veal.”	The suggested wording makes the text clearer and more specific.
	“Livestock farming practices more respectful of animal welfare also contribute to decrease greenhouse gas emissions, preserve biodiversity and are the only ethical choice.”	This is also shown in our long-term strategy for climate neutrality.
	“Climate change affects fish population development and causes displacement, with movements towards high latitude already observed. The shift towards sustainable fish and seafood production must be accelerated in the EU.”	The wording is somewhat too simplistic as climate change will have both direct and indirect effects on fish stocks and population.
	<p>“Sustainably farmed fish and seafood (e.g. algae) generate a lower carbon footprint than livestock production on land”</p> <p>“The Commission will provide guidance on how the innovative algae industry can grow without excessive regulatory barriers and with well-targeted support.”</p>	These statements, and these paragraphs in general, strongly favour some specific solutions; however, the text does not provide any scientific reference to back them up. Arguably, vegetarian or flexitarian diets also generate a lower carbon footprint– so why not (for instance) also provide guidance on how the “innovative <i>plant-based and cultivated meat industry</i> can grow without excessive regulatory barriers and with well-targeted support”? We wonder whether it is appropriate to target a specific industry (algae industry) in such a favourable manner instead of others; if the Strategy does so, this needs more robust justification.
Section 2.2	<p>“The food industry itself should show the way by (...) to integrate sustainability into corporate strategies.”</p> <p>Move it up (start after “...productivity gains and reduced costs to EU companies”).</p>	The actions presented in this paragraph are likely to have the highest potential of this section. The paragraph should be moved up in the section.

	“It will also revise the legislative framework on geographical indications to reinforce the sustainability criteria for such indications and ensure its ability to adjust to climate adaptation needs.”	With geographical indications building on territory specificities, e.g. varieties, terroir... a number of them may be affected by climate impacts and expected shifts in vegetation zones. This aspect should be taken into account in legislative revision.
Section 2.4	“. Tackling food loss and waste...”	The first sentence of this section is problematic. Is a kg of grain-fed beef which is eaten more sustainable than a kg of beans which is thrown away?
Section 3.1	“One key area of research will relate to both the supply of and the demand for alternative proteins such as (...). Moreover, a mission in the area of soil health and food will...”	We welcome the emphasis on this promising technology. “Supply and demand” seems more precise and clear than “availability and source”. Please replace “In particular” by “Moreover” in the second sentence, as this sentence presents a new topic that should not be subsumed under the previous one.
Section 3.2	“Advisory services are also key to reducing excess use of nutrients, promoting the appropriate use of antimicrobials, monitoring on-farm greenhouse gas emissions and removals, and optimising risk management in the face of future extreme weather events”	Advisory services are also key to monitor and optimise climate performance, both in terms of mitigation and adaptation.
	“The Commission will develop a Farm Sustainability Data Network that will allow primary producers to monitor not only their economic results but also their environmental and climate performance; this information can become the basis for certification programmes, thus creating new income opportunities for the most sustainable producers.”	<p>We welcome the idea of developing a FSDN, although it is not so clear how it can be used by an individual farmer to monitor its own performance – isn’t the FSDN supposed to be a survey of representative farms?</p> <p>Anyway, if it is indeed a farm-level tool, then the text could also indicate that the resulting information can be used as a basis for financial incentives.</p> <p>The development of a FSDN could also be added to the action list.</p>
	“The Commission will encourage the creation of a common European agriculture data framework to optimise the way land is used and food is produced; this framework will provide spatially-explicit	We welcome the mention of a common agriculture data space. The text should be more concrete in terms of the objective of such data framework: it should allow decision makers to make optimal decisions on how to use land and

	<p>information on production, land use, environmental and other data, allowing better planning and decision making at the policy level, and more precise and tailored production approaches at farm level.”</p> <p>[INSERT LINE SPACE]</p> <p>“The Commission will ensure support to SME food processors...”</p>	<p>produce food, integrating climate and environmental considerations.</p> <p>The paragraph on support to SMEs should constitute a separate paragraph.</p>
Section 3.3	<ul style="list-style-type: none"> Promote sustainable food systems during international event 	<p>The list could probably start with a more significant action, or the action should be reworded to make it more substantive.</p>
	<ul style="list-style-type: none"> “Use a partnership approach to support developing countries in their transition to sustainable food systems, [...], reducing malnutrition, enhancing coherence with Nationally Determined Contributions, National adaptation Plans and National Agriculture Investment Plans, ensuring Policy Coherence for Development. 	<p>A reference to the need to ensure climate-proof (low-carbon and resilient) agriculture systems could be added to this section. This also corresponds to one of the Task Force rural Africa recommendations but relevant for all developing countries.</p>
	<ul style="list-style-type: none"> “Build green alliances (...) in all relevant EU bilateral trade agreements in order to promote action in all trading partners. (...) and other multilateral organisations. [START NEW BULLET] The EU will continue to fight overfishing ... 	<p>The text could be a bit more specific about the fact that trade agreements can be used as a tool to push for more sustainable food systems in our trade partners.</p> <p>The bullet on overfishing should be a separate bullet.</p>
Action Plan	<p>Develop a regulatory framework for the certification of carbon removals including in farms and forestry systems by 2023. Lead DG: CLIMA and AGRI</p>	<p>Like in the main text, we propose the same wording that has been used in the Circular Economy Action Plan. The focus should be on certification rules for carbon removals (not emission reductions). CLIMA should be in the lead for the certification rules, as this initiative would build on existing work we have already started (see Cover note). AGRI can contribute by facilitating the</p>

		uptake of these rules in, for instance, eco-schemes. The timeline for this action in the CEAP is 2023.
	Add an action on the EU Code of conduct mentioned in section 2.2	To give more prominence to bottom-up pledging approaches by the industry
	Add an action on the Farm Sustainability Data Network	To give more prominence to the importance of monitoring the environmental and climate performance of the CAP