

Answer of DG ENV to the consultation "ISC/2020/01398" of DG SANTE

Version	1
Deadline	13/03/2020
Reference number	[REDACTED]
Contact *	[REDACTED]
Telephone *	[REDACTED]
Opinion *	Positive opinion with comments
Authorised in the DG by	CALLEJA CRESPO Daniel (ENV)
Comment(s) (3.500 characters max)	<p>Thank you for consulting DG ENV on the Farm to Fork communication. Overall, we are pleased with the document and consider that it succeeds in explaining the urgency of transforming our food system and in launching the process to do so. We particularly welcome the announcement that the Commission will propose a legislative framework for sustainable food systems by end 2023. We look forward to working with other services on developing this framework, in coherence with other initiatives, including the new Circular Economy Action Plan. Nevertheless, there are still some elements of the document that we believe need reinforcement in order to show the necessary level of ambition and commitment. The most important aspect to reinforce concerns the overall environmental and climate footprint of the food system. It is not sufficient to say that we aim 'ultimately' to 'reduce' it. In order to be credible about our resolve to transform our food system, it is essential to show the scale of the reduction required and to establish a timeframe to bring the system back within planetary boundaries. We do understand that it would be problematic to have a specific numerical target as for pesticides, however since we know from JRC work that the present food system exceeds planetary boundaries by a factor of two, we should be aiming to 'halve' the footprint. We would propose this should be done by 2030, but the timing should be established by discussion at political level. Specific wording can be found in annex. We also believe that the final section of the paper needs reinforcement. This is largely a matter of drafting, but this section should: -</p>

Clarify how we expect to work with the various stakeholders to move forward - Specify how the Commission will monitor progress, including on the reduction of the footprint of the food system. - Underline that the implementation of this new strategy will be done in full coherence with other initiatives, including the other components of the EGD, and in particular the Biodiversity Strategy, which is inextricably linked to the Farm to Fork Strategy. It is also crucial to ensure coherence with all future policy development across EU policy areas. - To set out a timeframe for review and possible updating of the strategy, indicating that this communication is just the first step in the journey. The attached document includes these suggestions as well as a number of other items which we would ask you to consider in preparing the final draft. The most important items have been signalled as such in marginal comments and include inter alia: -the link between the FAO sectoral definition of sustainable food and the issue of planetary boundaries, -comments on the specific targets (pesticides, fertilisers and organic production), as well as - the need to align with the new Circular Economy Action Plan on the timing of a future food waste proposal.

Close

Save

Send the answer

1 document(s) attached to the answer

Upload documents

Import from Ares

Delete



[F2F ISC response.docx](#)

version 1 from 12/03/2020 13:49:53



Annex with tracked changes and detailed comments:

Section 1:

(page 1, paras 1 and 2)

Page 1, para 3: European food is safe, nutritious and of high quality. This is the result of years of EU policy aimed at protecting human, animal and plant health. However, climate change, biodiversity loss and the **pollution and** degradation of land and sea are a reality despite farmers and fishers' current efforts. Extreme weather events around the globe, which are set to increase significantly with higher temperatures, severely affect agriculture, forests, fisheries and aquaculture, including through the spread of animal and plant diseases and invasive alien species. Food systems are globally responsible for around 21-37% of total **anthropogenic** green house gas (GHG) emissions **and for the majority of biodiversity loss**, have a profound effect on **biodiversity, water quality and quantity, air and soil pollution**, carbon sinks and are one of the principal causes of resource depletion and degradation of natural ecosystems. **Soil where some 95% of our food comes from¹ continue being degraded in the EU and globally²**. Livestock supply chains account for 14.5% of global GHG emissions. In the European Union, 71% of farmland is dedicated to meat and dairy production and almost half of the European Union agricultural GHG emissions come from the animal sector. In addition **to the impact from food production**, manufacturing, processing, packaging and transportation of food greatly contribute to pollution of air, soil and water and produce GHG emissions.

Page 1, para 4: The Climate Law sets out the trajectory/target for a climate-neutral Union in 2050. Innovative, efficient and sustainable production methods as well as smart and conscious consumer choices provide a pathway for reductions of emissions and externalities in agriculture and the downstream food value chain towards a climate neutral Union in 2050. Maintaining and further increasing the natural carbon sink of forests, soils, **rivers seas oceans** and agricultural lands and coastal wetlands is equally crucial for the success of a climate neutral Union in 2050. To deliver on the Green Deal's ambitions, food systems urgently need to become sustainable and operate within planetary boundaries. **This means they need and to** deliver food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised".

Page 2, para 1: While the performance of EU food systems in terms of sustainability has improved in certain respects, **significant** progress is still needed to reduce **dependency on the use of** pesticides and fertilisers and to increase organic farming, **to reverse biodiversity loss and reduce pollution**. **When it comes to biodiversity, the negative trend must be reversed.** A decisive policy impetus is required for an accelerated, irreversible change, taking into account diverse challenges across sectors, regions and Member States. Farmers, fishers and aquaculture producers have a pivotal role to play in making food systems sustainable, not the least because their economic future is at stake. They **are must be** part of the solution but **require the right** incentives and **support throughout** the transition. Other actors across the value chain, including manufacturers and retailers also have an **equally** important responsibility to deliver change and a fairer and more efficient food system.

Page 2, para 2: Food insecurity remains an issue. The global population is projected to increase to more than 9 billion by 2050. Considering also that over 820 million people presently suffer from

Commented [D1]: Is this correct? Should be clarified one way or the other

Commented [D2]: FAO reported that agriculture is globally responsible for 66% of threats to species (FAO 2013 <http://www.fao.org/3/i3347e/i3347e.pdf>) while according to the JRC the EU food consumption of only 8 food products (pork meat, beef meat, poultry meat, cheese, eggs, sunflower oil, butter and milk) contribute to more than 75% of total damage to biodiversity (<https://ec.europa.eu/jrc/en/publication/biodiversity-impacts-due-food-consumption-europe>).

Commented [D3]: Soil is the main support for terrestrial based for food production and should be mentioned explicitly.

Commented [D4]: IMPORTANT: The present wording suggests that the second sentence is the consequence of the former one, which is not correct since to operate within planetary boundaries much more is needed from the food system than to ensure 'food security and nutrition'.

Commented [D5]: Or 'should be' or 'can be'... the problem is that right now, they mostly are not, because they don't have the right incentives

¹ <http://www.fao.org/3/a-i4405e.pdf>

² SOER 2020 (EEA 2019), IPCC Land and climate change (2019), IPBES Land assessment (2018)

hunger, global food availability would need to increase by 50% ~~percent~~ from 2012 to 2050 in order to meet the increased demand. ~~This is while increased demand on land resources shows up as declining crop production, degradation of land quality and quantity, and competition for land~~

(page 2, paras 3, 4, 5 and 6)

Page 3, para 1: social and health benefits and offer economic gains. At global level, it is estimated that a food and agriculture system in line with the Sustainable Development Goals (SDGs) could create new economic value of more than EUR 1.8 trillion by 2030. Ensuring sustainable livelihood for primary producers, who still lag behind the rest of the EU economy in terms of income, is essential for the transition to sustainable food systems. For example, the average EU farmer currently earns around half of the average worker in the economy as a whole. Research, innovation, nature-based solutions, digitalisation, technology, knowledge sharing and financial investments will provide solutions that deliver better environmental results and higher profits and will open up new business and job opportunities

Page 3, para 2: A ~~more-sustainable~~ food system is instrumental in delivering the climate and environmental objectives of the Green Deal, reducing pollution to non-harmful levels for people and ecosystems and halting biodiversity loss, through a circular economy while reinforcing the EU's competitive sustainability. The Farm to Fork Strategy is an instrument to support this transition by placing the emphasis on new opportunities for all consumers and economic players active in the food chain.

Section 2

Page 3, para 3 In the context described above, the EU's ~~overall ultimate~~ goal is to ~~reduce-halve~~ the environmental and climate footprint of the food system ~~by 20XX in order to return within planetary boundaries~~ lead a global transition towards competitive sustainability from farm to fork and tap into new opportunities. This means:

- Ensuring that the way that food is produced, transported, distributed ~~and~~, marketed ~~and~~ consumed has a neutral or positive environmental impact, preserving and restoring the land and sea-based resources on which the food system depends' contributing to mitigating climate change and adapting to its impacts; protecting land, soil, water, air, plant and animal health; and stopping the loss of biodiversity.

(2 other bullet points)

Page 3, para 4: In championing the global transition, the EU can make sustainability its key trademark and gain a competitive first mover advantage. To achieve a fair, healthy and environmentally friendly food system, an integrated approach covering the entire food chain from farm to fork is needed. To that end, key targets in priority areas are set for the EU as a whole. To reach those targets, different starting points and differences in improvement potential between Member States should be duly recognised to ensure a fair transition. By end 2023, a legislative framework for sustainable food systems will be proposed to recognise performance of front-runners and gradually raise sustainability standards so as to become the norm for products placed on the EU market.

Section 2.1

(page 4, para 1)

Commented [D6]: Unclear wording

Commented [D7]: We agree that there is a problem with farmers' revenues being too low and consider that this is largely because of the pressure of big distribution chains. This problem is not really addressed with concrete measures anywhere in the strategy. This issue looks key, because low food prices create pressures to produce unsustainably (e.g. using more chemicals to increase yield). See the example of ES ("España vaciada") or FR.

Commented [D8]: IMPORTANT: Insufficiently ambitious (and actually not correct – either a system is sustainable or it is not sustainable)

Commented [D9]: VERY IMPORTANT! This is ESSENTIAL in order to establish overall ambition of the strategy.

Commented [D10]: Highly relevant to food waste!

Commented [D11]: IMPORTANT: We strongly support this commitment and look forward to working with other DGs to develop it in coherence with other initiatives (including CEAP)

Page 4, para 2: The Commission's Common Agriculture Policy (CAP) reform proposal of June 2018 aims to support farmers to achieve sustainability in farming – through a more results-oriented model, better use of data and analysis, improved mandatory sustainability standards and new voluntary measures. In particular, “eco-schemes” offer a new way for CAP beneficiaries to take more environmental action under Pillar I of the CAP, major new stream of funding to support the uptake of sustainable practices, such as precision agriculture, agro-ecology, agro-forestry and organic farming. The Commission and member States should pay a particular attention to the implementation and resource allocation of eco-schemes in the strategic plans. In that context, but not only, the commission will ensure, in its work with the co-legislators, that the Green Deal ambition is squarely reflected delivered in the agreed CAP legislation. It will also ensure that the Member States strategic plans adhere to a concerted and ambitious approach in line with the Farm to Fork Strategy, including on climate and environment, biodiversity, pesticides, fertilisers, antibiotics and organics.

Commented [D12]: Can we say how?

Page 4, para 3: A promising example of new green business models is carbon capture by farmers. Payments through the CAP or from private initiatives (carbon markets) can make the relevant farming practices financially rewarding. To this end, the Commission will develop an ‘EU Carbon Farming manual’ to quantify emission reductions and carbon removals in farms and forestry systems, including through agroforestry, silvopastoralism and landscape features in farmland (such as hedges trees terraces and field margins).

Commented [D13]: IMPORTANT:

DG ENV considers it is necessary to set at 50% the reduction target for both the use/risk and the high risk pesticides.

The provisions on the cumulative and synergistic effects of plant protection products has been the plant protection product regulation since its adoption in 2009. However, these provisions have not yet been applied because of the lack of methodology. EFSA has now been developing the methodology since 2009 and it is now sufficiently ready to be used for regulatory purposes. It is appropriate now to announce that we will start applying those provisions.

Page 4, para 4: The use of chemical pesticides in agriculture is responsible for pollution of soil, water and air and can negatively impact on non-target plants and animals such as, insects, birds, mammals and amphibians. The Commission will take actions to reduce by ~~50%~~ the use and risk of chemical pesticides by 2030 and reduce by ~~50%~~ the use of high-risk pesticides by 2030. To this end, it will revise the Sustainable Use of Pesticides Directive, enhance provisions on integrated pest management and promote greater use of alternative ways to protect harvests from pests and diseases. Agricultural practices that lead to a reduction of use of pesticides such as agro-ecology, organic farming and precision agriculture will be promoted under the CAP. The Commission ~~it~~ will also facilitate placing on the market of plant protection products containing biologically active substance ~~and~~, reinforce the environmental risk assessment of pesticides and start applying provisions on cumulative and synergistic effects of residues of plant protection products. The Commission will revise the Regulation concerning statistics on pesticides to overcome existing data gaps and reinforce evidence-based policymaking. Finally, the Commission will enforce actions to curb delays in the authorisation process.

Commented [D14]: In 2015, 94% of all ammonia emissions in the air came from agriculture sources and they mainly occur as a result of volatilisation from livestock excreta or following manure spreading on agricultural land¹. A smaller proportion of ammonia emissions result from the volatilisation of ammonia from nitrogenous fertilisers and from fertilised crops.

Ammonia forms particulate matter in the atmosphere which has adverse effects on human health. It can also deposit and lead to soil acidification and water eutrophication.

Page 4, para 5: The excessive use of nutrients in agriculture i.e. those that are not absorbed by plants, ~~has been~~ is a major source of air soil and water pollution, degradation of landscape features, impacts on climate, and has reduced biodiversity in rivers, lakes and wetlands by about one-third globally. The overuse of fertilisers can also cause economic and social harm for instance due to the high costs of treating polluted water to make it fit for drinking due to the collapse of ~~as~~ fish stocks collapse under the pressure of a polluted sea and due to the impacts on the communities and economic sectors, such as tourism and fisheries, that depend on these natural resources.

Commented [D15]: Abundant availability of nutrients is a key contribution ruining landscape features for biodiversity – biodiversity hotspots are mostly the oligotrophic ecosystems / landscape features

Page 5, para 1: The Commission will take actions to reduce by XX% the use of fertilisers by 2030 ensure zero pollution from nitrogen and phosphorus flows from organic and mineral fertilisers through an effective reduction of use and elimination of surplus by 2030¹. This will be achieved by

Commented [D16]: IMPORTANT: DG ENV considers that it is essential to focus not on the use of fertilisers but on their OVERuse and therefore the losses in the environment, which are those causing pollution and eutrophication. Focusing on the elimination of the excess of fertilisers with a zero pollution ambition is the most appropriate target for fertilisers

¹ Ensuring zero pollution does not mean “zero fertilisation” or “zero losses” but that the nutrient losses should not be at a level causing harm to human health or the environment

the full implementation and enforcement of the relevant environmental and climate legislation, identifying with Member States the nutrient reduction loads needed to achieve these goals, putting forward specific actions in the Integrated Nutrient Management Action Plan to address nutrient pollution at source and improving the management of nitrogen and phosphorus throughout the whole life-cycle. The Commission will also work with Member States to foster a more widespread application of balanced, more precise fertilisation and sustainable agricultural practices, including notably in hotspot areas of intensive livestock farming. Such improvements can also be done through the measures in the CAP strategic plans. The Commission will also work towards minimising pollution caused by the use of fertilisers contaminated with hazardous chemicals.

Page 5, para 2: EU agriculture is responsible for 11% of EU GHG emissions out of which nearly 60% are linked to animal farming. The livestock sector contributes in the EU to as much as 78% of terrestrial biodiversity loss, 80% of soil acidification and air pollution and 73% of nutrient pollution⁴. To contribute to reducing the environmental and climate impact of animal production, in addition to CAP measures, the Commission will facilitate the placing on the market of sustainable and innovative feed additives that help reduce the carbon footprint, water and air pollution and methane emissions of livestock farming. It will also examine EU rules to foster the replacement of critical feed materials (e.g. soya from deforested land) by more sustainable feed materials such as insects, marine feed stocks and by-products from the bio-economy. In areas where land availability and the carrying capacity of the surrounding environment is surpassed, the transition to a sustainable food system will require the reduction of livestock density. A review of the promotion programme for agricultural products will also be conducted with a view to enhance its contribution to sustainable production and consumption. The Commission will also strictly assess the compliance of granting coupled income support with a view to improving the sustainability of the supported sectors.

(page 5, paras 3, 4 and 5)

Page 6, para 1: Food security begins with seed security. Farmers need to rely on a diversity of quality seeds for plant varieties adapted to the pressures of climate change. The Commission will take measures to facilitate the registration of seed varieties, including traditional varieties and for organic farming, and to ensure a lighter market access of traditional and locally adapted varieties.

Page 6, para 2: Organic farming is the best known and best regulated agro-ecological practice and an environmentally friendly practice that needs to be further developed. In addition to CAP measures, the Commission will stimulate the overall demand for organic products and ensure consumer trust as well as uptake of the scheme through the future Organic Farming Action Plan. In line with the ambition defined in the EU Biodiversity Strategy 2030, the aim is to achieve the (xx)30% of the agricultural area under organic farming by 2030.

(page 6, para 3)

Page 6, para 4: Farmed fish and seafood (e.g. algae) generate a lower carbon footprint than animal production on land. The next Maritime and Fisheries Fund will spend more than EUR 1 billion to support sustainable seafood farming. The Commission will adopt EU Guidelines on Aquaculture to set out pathways for Member States' national aquaculture development plans and promote the right kind of expenditure under the Fund. The Commission will provide guidance on how the a

Commented [D17]: It appears clearly disproportionate and unrealistic to indicate that the huge footprint of the livestock sector will be solved with feed additives. The feed additives will be able to only marginally reduce the impacts of intensive livestock farming on water, air, biodiversity and GHG emissions. Therefore the action should "contribute to it".

Commented [D18]: Can this be clarified? Does it mean that drugs (the equivalent to humans' Aerored) will be provided to cows?

Commented [D19]: registration facilitated" sounds like if companies could register a seed – which can be a natural one. There was a controversy on something similar some years ago, with a famous and controversial company involved registering natural seeds. To avoid controversies and misunderstandings, some clarification looks relevant.

Commented [D20]: IMPORTANT: DG ENV consider that an ambitious but realistic target is 30 of the agricultural area, as this is in line with the level of ambition of many Ms and with a business as usual scenario the EU would reach already 16%. This target would also support the achievement of the fertiliser and the pesticides targets.

Formatted: English (United Kingdom)

⁴ JRC (2015) Study <https://ec.europa.eu/jrc/en/publication/impacts-european-livestock-production-nitrogen-sulphur-phosphorus-and-greenhouse-gas-emissions-land>

sustainable and innovative algae industry can grow ~~without excessive~~within an adequate regulatory ~~barriers framework~~ and with well-targeted support.

(page 6, para 5)

Section 2.2

(page 6, para 6)

Page 7, para 1: of suppliers, production methods, packaging and transport and their merchandising and marketing practices. They have the power to influence consumers' dietary choices by promoting more or less healthy and sustainable products. As the biggest global food importer and exporter, the EU food and drink industry also affects the environmental and social footprint of global trade. Due to their role in the European and global food systems, the largest food manufacturers and retailers groups should lead in improving their environmental footprint, contributing proportionally to the EU's ambition to halve the overall environmental footprint of the EU food system.

(page 7, para 2)

Page 7, para 3: To ensure the uptake and supply of sustainable agricultural, fishery and aquaculture products and reduce food loss and waste, the Commission will revise marketing standards. It will also revise the legislative framework on geographical indications to reinforce the sustainability criteria for such indications, based on environmental footprint methods.

(page 7, paras 4 and 5)

Page 7, para 6: Food packaging also plays a key role in food systems' sustainability in terms of health, environment and food waste prevention. The Commission will revise the Food Contact Materials legislation to improve food safety and ensure citizens' health (in particular in reducing/minimising the use of hazardous chemicals and better addressing risks from endocrine disruptors and cumulative and synergistic effects), to support the user of innovative and sustainable packaging solutions, using environmentally friendly, re-usable and recyclable materials and to contribute to food waste reduction. In addition, under the new CEAP, the Commission work towards a legislative initiative on reuse in food services to substitute single-use food packaging and cutlery by reusable products.

Page 7, para 7: ... ensure that campaigns related to food prices do not undermine citizens' perception of the value of food and reduce packaging (cf. new Circular Economy Action Plan). ...

Section 2.3

(page 7, para 8 ; page 8, paras 1, 2 and 3)

Page 8, para 4: The Commission will therefore propose to empower consumers to make healthy and sustainable food choices. To this end, it will propose to introduce mandatory front-of-pack nutrition labelling taking into account the diversity of diets and extend mandatory origin indication to milk as well as milk and meat used as ingredient. Origin labelling will enable consumers to identify local-produced food and stimulate short supply chains to the benefit of farmers. It will also examine the possibility to harmonise voluntary green claims and combat misleading environmental claims regarding the environmental footprint of products and organisations in the food sector as announced in the Circular Economy Action Plan. Finally, in the medium term, the Commission will develop a sustainable food labelling framework integrating nutritional, climate, environmental and social aspects.

(page 8, paras 5 and 6)

Formatted: French (Belgium)

Commented [D21]: Add something on reducing 'food miles'?

Formatted: French (Belgium)

Commented [D22]: Noting that locally-produced is not always the most environmentally friendly....

Commented [D23]: IMPORTANT: This should involve the ENV initiative on green claims, as well as the JUST initiative on environmental impacts not covered by the environmental footprint methods.

Section 2.4

(page 8, para 7 ; page 9, paras 1 and 2)

Page 9, para 3: ~~4-The Commission~~ will integrate food loss and waste prevention in relevant EU policies to achieve synergies and avoid conflicts wherever possible. Misunderstanding and misuse of date marking ('use by' and 'best before' dates) lead to food waste in the supply chain. The Commission will.....

Commented [D24]: This section immediately addresses the food waste issues whereas the "food loss" (prevention) is not addressed. Prevention should be highlighted as a priority - in line with the EU Green Deal, before the policies on waste management kick in.
Para 1 mentions interlinkages but they are not then addressed/explained - It is not clear what is meant in terms of EU action.

Commented [D25]: Can examples be included?

Formatted: English (United Kingdom)

Section 2.5

(page 9, paras 4 and 5)

Section 3.1

(page 9, para 6)

Page 10, para 1 : Under Horizon 2020, the Commission is preparing for 2020 an additional call of around EUR 1 billion allocated to Green Deal priorities. Under Horizon Europe, the Commission proposed to spend EUR 10 billion in R&I related to food, bioeconomy, natural resources, agriculture, fisheries, aquaculture and environment. Relevant Horizon Europe programming will follow a food systems approach in order to deliver on the objectives of the Farm to Fork Strategy. One key area of research will relate to increasing the availability and source of alternative proteins such as plant-, microbial-, marine- and insect-based proteins and meat substitutes. In particular, a mission in the area of soil health and food will aim at developing solutions for restoring soil health and soil functions, and a mission on healthy oceans, coastal and inland water could contribute to developing solutions for sustainable food from the sea.

Page 10, para 2 : ... In its Long Term Vision for Rural areas, it will also ensure that access to fast broadband internet in rural areas reaches 100% by 20XX so that technology and knowledge-based solutions can be developed. ...

Section 3.2

Page 10, para 3: Knowledge and advice are key to enable all actors of the food supply chain to become sustainable. Primary producers have a particular need for tailored advisory services to become aware of the most sustainable management choices and Member States will need to scale up support for such services in their future strategic plans. Integrated pest management should become a common standard for every farmer and advisory services including on use of digital tools have a crucial role to play in making this happen. Advisory services are also key to reducing excess use of nutrients, uptake of biodiversity-friendly practices, sustainable management of water and soil, and promoting the appropriate use of antimicrobials. 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.

Page 10, para 4: The common European agriculture data space will enhance the competitive sustainability of the agricultural sector through the processing and analysis of production, land use, environmental and other data, allowing precise and tailored application of production approaches at farm level. The Commission will ensure support to SME food processors, small retail and food service operators with tailored solutions to promote new skills and business models, while avoiding administrative and cost burden. It will develop an SME-friendly Sustainability Manual for food processors and for retailers to disseminate best environmental management practices. The

Enterprise Europe Network will provide advisory services on sustainability for SMEs and foster dissemination of best practices and improve their access to finance.

(page 10, para 5)

Formatted: French (Belgium)

Section 3.3

(page 11, para 1)

- Promote sustainable food systems during international events (e.g. UN convention on Biological Diversity in 2020, UN Summit on Food Systems in 2021 UNEAS).
- (other bullet points)

Page 11, para 2: As part of the general approach to food labelling and in line with international commitments the EU will promote appropriate labelling schemes – including an EU sustainable food labelling framework – to incentivise trade partners to ensure that food imported into the EU has been produced in a sustainable way.

Page 11, para 3: To reduce the EU's contribution to global deforestation and forest degradation, the Commission will propose regulatory and non-regulatory measures in 2021 to minimise the risk associated with commodities placed on the EU market.

Commented [D26]: IMPORTANT: We fully support this text which should be maintained.

(page 11, para 4)

Page 11, para 5: Further measures are to be added based on discussion at political level.]

Commented [D27]: IMPORTANT: We strongly believe that it is essential to use trade policy to prevent environmental dumping. Furthermore, it will be impossible to transform the EU internal food system if EU actors will be undercut by cheaper, unsustainable imports.

Section 4

(page 12, paras 1 and 2)

Page 12, para 3: The Commission invites EU institutions to endorse this Strategy and to actively contribute to its implementation. All citizens and stakeholders are invited to engage in a broad public debate and to act as hosts of debates in national, regional and local assemblies.

Page 12, para 4: The Commission will ensure the rapid implementation of this strategy in close coherence with the other elements of the Green Deal, particularly the Biodiversity Strategy, the new Circular Economy Action Plan and the Zero Pollution ambition. It will monitor the transition to sustainable food systems, including meeting of the targets and progress towards halving the EU's food system footprint. Data will be collected regularly, including on the basis of Earth observation, to monitor the environmental, health and economic impacts. This strategy will be reviewed to assess whether the actions undertaken are sufficient to reach the objectives or whether additional actions are necessary.

Commented [D28]: IMPORTANT: We consider this conclusion to be very weak and that it should be strengthened to leave the reader convinced that we mean action. In addition to the specific tracked changes, we would propose clarity on the anticipated outcome of the various 'debates' and how the Commission will support/react to them. Also, WHEN will the strategy be reviewed.

Annex

(action 1)

Action 2: Proposal for a revision of the Sustainable Use of Pesticides Directive to significantly reduce use, risk and dependency on pesticides and enhance IPM.

(actions 2, 3 and 4)

Action 5: Comprehensive plan for integrated nutrient management to reduce the pollution from fertilisers including from fertilisers in agriculture. 2022. ENV/AGRI

Commented [D29]: If this column is only the lead DG, it should just be ENV

(actions 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16)

Action 17: Set minimum mandatory criteria for sustainable food procurement to promote health and sustainable diets, including organic products, in schools and public institutions.

(action 18)

Action 19: Proposal for EU-level targets for food waste reduction. ~~2023~~2022. SANTE/ENV

(action 20)

Commented [D30]: Good that the Commission is seen as promoting the existing GPP criteria on food catering, notably in the Commission. What is the piece of law SANTE intends to use to make the GPP binding or is it envisageable to act through the Sustainable Product Policy framework (under CEAP) on that?

Commented [D31]: IMPORTANT: To ensure consistency with the CEAP