



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR RESEARCH & INNOVATION

The Director-General

Brussels, 9 March 2020

NOTE TO ANNE BUCHER, DIRECTOR-GENERAL – DG SANTE

**SUBJECT: REPLY OF Jean-Eric PAQUET, DIRECTOR-GENERAL - DG RTD
TO THE INTERSERVICE CONSULTATION LAUNCHED BY DG SANTE**

Note signed by: Mr John BELL Deadline: 13/03/2020
Date reception: 04/03/2020
Reference DECIDE: ISC/2020/01398

Title:

☐ Positive opinion

☒ Positive opinion with comments

☐ Negative opinion

Contact persons:

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Please find below our comments.

p.o. John BELL
Jean-Eric PAQUET

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 Research and Innovation (DG RTD) on the above-mentioned initiative. We agree on the proposal, provided that our comments and modifications are taken into account and integrated into the consolidated version of the document.

Of particular importance to DG RTD are the issues mentioned under “Main points” so as to better reflect the mandate and responsibilities of the lead DG for European R&I policy. In particular, we stress the need to include a **dedicated R&I Action** within the Action Plan to act as a key enabler to identify, test and deploy solutions to reach the targets of this Communication. We also propose that **DG RTD co-leads with DG SANTE on the future legislative framework**, for which R&I policy must be an essential element to ensure an evidence-based approach for its development and subsequent place-based implementation at multiple scales (national to local). Finally, the future **CAP should make more significant contributions** to the more ambitious targets defined in the Farm to Fork Communication. Other issues, mostly editorial and to ensure sufficient breadth and overall consistency, are mentioned in “Other points”.

MAIN POINTS

Page 3 (seventh paragraph, lines 6-7): add “and to guide their deployment at national, regional and local scales”.

- “By end 2023, a legislative framework for sustainable food systems **to support their deployment at national, regional and local scales** will be proposed to recognise (...)”.
- Justification: Such a framework to be impactful should motivate food system transition strategies at all geographical scales (national, regional, local). Ideally, this should be a target.

Page 9 (last paragraph, line 2): add “can help convene around systemic and multi-sectoral issues,” and “develop and test solutions”.

- “Research and innovation (R&I) are key drivers in accelerating the transition towards sustainable, healthy and inclusive food systems, **can help convene around systemic and multi-sectoral issues**, resolve tensions, **develop and test solutions**, overcome barriers (...)”.
- Justification: R&I policy is well suited to mobilise actors and policy sectors to address systemic issues such as this one, which cannot be solved by few policy areas alone. R&I is also key to develop and test solutions on the ground.

Page 9 (last paragraph): add a footnote.

- Add in footnote at the end of the first paragraph of section 3.1 “**SWD 2019/319 (FOOD 2030: European Research & Innovation for Food & Nutrition Security, European Commission, 2016)**”.

- Justification: Food 2030 aims to develop pathways of actions to transform the food system and make it more sustainable, healthier and more inclusive. This was fundamental in underpinning Farm to Fork and will continue to provide solutions to food system transformation 2021 and beyond.

Page 10 (first paragraph, line 5): add “through its various instruments and programmes.”

- “(...) in order to deliver on the objectives of the Farm to Fork Strategy **through its various instruments and programmes.**”
- Justification: More money will be available beyond the 10 billion euros through the use of the other pillars of Horizon Europe (ERC, EIT, EIC).

Page 10 (first paragraph, line 6): Replacement of part of sentence.

- Replace “~~One key area of research will relate to increasing~~ the availability (...)” with “**One example is a research area relating to increasing** the availability (...)”.
- Justification: We should not give priority to particular area of research. This should only be an example to increase understanding.

Page 10 (first paragraph, line 9): Additions.

- “(...) restoring soil health and soil functions, **and a partnership on food system will federate the R&I communities around food system transformation**”. Add footnote “**Partnership on Safe and sustainable food system for people, planet and climate**”.
- Justification: Missions and partnerships are two of Horizon Europe’s instruments. A partnership on food system will be a key too for food system transformation.

Page 10 (first paragraph): Addition.

- Add “**Investments of the private sector and in Member States should be mobilised, also through the use of additional instruments beyond Horizon Europe by exploiting synergies with other funds such as rural development, and cohesion and Erasmus+ funds. For example, science education programmes should provide guidance for schools and teachers on food system transformation and making the link with the ERASMUS+ programme**” at the end of the first paragraph p.10.
- Justification: the text focuses on EU funding only, which represents up to 10% of public money. Member States and private investors are key players and should be heavily involved in the transformation of the food system. It is important to leverage and align these other sources of funding (90%).

Annex (Action Plan): Addition.

Add the following line below Action 1.

<ul style="list-style-type: none"> • Use of Horizon Europe to support solutions, including through partnerships and missions, mobilising all actors to address Farm to Fork challenges and opportunities, as well as linkages with other Green Deal priorities 		2.	RTD/AGRI
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- Justification: As mention in the Strategy, R&I is a key driver in accelerating the transition towards sustainable, healthy and inclusive food systems. For example, the Commission is developing 10 pathways of actions, in the framework of Food 2030, to transform the food system and make it more sustainable, inclusive and healthier. The results of this and other work under Horizon Europe will be shaped to deliver to the Farm to Fork Strategy and beyond.

Annex (Action Plan): Additions.

- Add RTD as co-lead of Actions 1 and 5.
- Justification: To ensure that RTD can contribute to the evidence-based policy making and implementation process through its R&I policy in Horizon Europe.

OTHER POINTS

Page 1 (second paragraph, lines 1-2): insert "and healthy".

- “It seeks to address the challenges of sustainable **and healthy** food systems (...)”.
- Justification: The Farm to Fork Strategy aims to improve the food system and decrease its impact both on the environment and on health. The text clearly mentions the environmental aspects and the notion of sustainability, but the health aspects should not be forgotten.

Page 1 (second paragraph, line 3): add “, with the Farm to Fork Strategy,”.

- “The Green Deal, **with the Farm to Fork Strategy**, marks a paradigm shift, moving the focus from food production and agriculture to food systems (...)”.
- Justification: This paradigm shift production/agriculture towards food system occurs specifically in the Farm to Fork Strategy. The Green Deal is more like the policy umbrella enabling it.

Page 1 (third paragraph, line 5): insert ‘soils’

- ‘(...), **severely affect agriculture, forests, soils, fisheries and aquaculture (...)**’
- Justification: Soils will be affected even outside of agricultural systems and forests, such as coastal or riparian zones.

Page 1 (third paragraph, line 10-11): comment.

- “In the European Union, 71% of farmland is dedicated to meat and dairy production (...)”. The source is missing.
- Justification: The sources of all figures have almost always been provided, except for this figure.

Page 1 (third paragraph, line 13): add “retailing”.

- “In addition, manufacturing, processing, **retailing**, packaging and transportation of food greatly contribute to pollution (...)”.
- Justification: The whole “middle part” of the food system should be considered here. Retailers can have an important impact on the food waste issue for example.

Page 2 (first paragraph): insert “food services”.

- “(...) including manufacturers, retailers and food services, also have an important responsibility to deliver change (...)”
- Justification: Food services should be mentioned as important players in bringing about a demand pull for more sustainably produced food and in reducing food waste.

Page 2 (first paragraph): comment about footnote 6.

- What is the source of the figures?
- Justification: It is important to link every figure to their sources for a more robust and evidence-based text.

Page 2 (second paragraph, line 1): add “and malnutrition”.

- “Food insecurity and malnutrition remain an issue”.
- Justification: This is the wider concept currently used in development cooperation.

Page 3 (first paragraph, line 5): comment.

- “For example, the average EU farmer currently earns around half of the average worker in the economy as a whole (...)”. The source is missing.
- Justification: The sources of all figures have almost always been provided, except for this figure.

Page 3 (first paragraph, line 8): add “and health-related”.

- “Research, innovation, digitalisation, technology, knowledge sharing and financial investments will provide solutions that deliver better environmental and health-related results, and higher profits (...)”.
- Justification: R&I on food system focuses on several co-benefits: environment and climate, nutrition and health aspects, circularity and communities (including economic aspects). As such, the health aspects need to be added in this sentence.

Page 3 (second paragraph, line 4): modification of a sentence.

- Replace “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” with “The Farm to Fork Strategy is an instrument to support this transition by placing the emphasis on new opportunities for all citizens and economic players active in the food system”.
- Justification: Citizens is a wider term. Food chain illustrate some kind of linearity, while a food system is more complex. Food system therefore should be used consistently throughout the Strategy. Hence the suggestion to replace “chain” with “system”.

Page 3 (third paragraph): Comment.

- The term “competitive sustainability” could be explained in a footnote, stressing that it encompasses, besides the economic aspect, also the social and environmental one.

Page 3 (third paragraph, line 2): Add “so as to offer a major contribution to the preservation of a healthy planet and its people”.

- “(...), lead a global transition towards competitive sustainability from farm to fork and tap into new opportunities, so as to offer a major contribution to the preservation of a healthy planet and its people.”
- Justification: The second bullet point following below the paragraph focuses on that aspect of the strategy; it may therefore be useful to mention it in the introductory text.

Page 3 (third paragraph, second bullet point): add “and nutrition”.

- “Ensuring food and nutrition security and citizens’ health”.
- Justification: The change has been proposed in order to be in line with FAO use of the term. There is no food security without nutrition security.

Page 3 (fourth paragraph, lines 2-3): modification of the sentence.

- Replace “To achieve a fair, healthy and environmentally friendly food system, an integrated approach covering the entire food ~~chain~~ from farm to fork is needed” with “To achieve a fair, healthy and environmentally friendly food system, an integrated approach covering the entire food system from farm to fork is needed”.
- Justification: Food chain illustrate some kind of linearity, while a food system is much more complex. Food system is the correct expression that should be used in the Strategy. Hence the suggestion to replace “chain” with “system”.

Page 4 (second paragraph, line 8): addition.

- “strategic plans. Additionally, support from rural development should give farmers the right incentives to do more for the environmental objectives, including on pesticides reduction and biodiversity, as set out in this Communication”.
- Justification: Establish a link between the CAP and the objectives spelled out in the Biodiversity Strategy.

Page 4 (second paragraph, line 12): Modification of terms used.

- Replace “, including on climate and environment, pesticides, fertilisers, antibiotics and organics”, with “including on climate and environment, pesticides, fertilisers, antibiotics and organic farming”.
- Justification: ‘Organics’ does not appear to be an established term. We should therefore continue to refer to ‘organic farming’, as in the rest of the text.

Page 4 (fourth paragraph, line 6): Add “safe”.

- “(...) promote greater use of safe alternative ways to protect harvests from pests and diseases.”
- Justification: The need for the novel pest management approaches to be safe/sustainable should be emphasised.

Page 4 (fifth paragraph): Add “leakage”.

- “The excessive use and leakage of nutrients in agriculture (...)”.
- Justification: This addition highlights that the problem relates, not only to excessive use, but also to mismanagement/mishandling of fertilizers.

Page 4 (fifth paragraph): Comment/request for an amendment.

- Footnote number 13 refers to the global contribution of synthetic fertilizers to global GHG emissions. However, more relevant statistics to use would be data from the EU inventory report (NIR 2019) or 4th EU Biannual Report to the UNFCCC, looking at source categories of ‘direct emission from soils’ and, partly, ‘manure management’. There, the data show that direct N₂O emissions from managed soils account for 2,8% of EU28 emissions (p. 577, EU NIR 2019).
- The footnote is problematic also because it seems to be downplaying the problem (“...account for *just under* 2% of global GHG emissions”) and because it only looks at synthetic fertilizers – organic fertilizers can equally lead to pollution problems.

Page 4 (fifth paragraph, line 4): Modification of a sentence.

- Replace “The overuse of fertilisers can also ~~cause~~ economic and social harm as fish stocks collapse under the pressure of a polluted sea”, with “The overuse of fertilisers can also **contribute to** economic and social harm **through eutrophication putting further pressure on polluted seas and water.**”
- Justification: The implied link between sea pollution and the collapse of fish stocks is not correct: the biggest contributor to stock decline is overfishing.

Page 5 (first paragraph, line 1): Please ensure alignment with the Biodiversity Strategy.

- “The Commission will take actions to reduce by XX% the use of fertilisers by 2030”. For your information, the corresponding text in the Biodiversity Strategy is: “The Commission will promote zero pollution from nitrogen and phosphorus flows from fertilisers through an effective reduction of use and an elimination of excess use by 2030, and the application of balanced fertilisation and sustainable nutrient management. This will be achieved through an Integrated Nutrient Management Action Plan in 2022”.
- Justification: We need to ensure coherence between the Commission’s communications.

Page 6 (second paragraph, line 4): Please ensure alignment with the Biodiversity Strategy.

- “In line with the ambition defined in the EU Biodiversity Strategy 2030, the aim is to achieve the (XX of the area) under organic farming by 2030”. For your information, the corresponding text in the Biodiversity Strategy is: “the uptake of agro-ecological practices is significantly increased and [at least xx%] of agricultural land is under organic farming”. Please ensure alignment with the Biodiversity Strategy.
- Justification: We need to ensure coherence between the Commission’s communications.

Page 6 (in between second and third paragraph): Addition.

- **“Plastics are extensively used in primary production (both agriculture and fishery sectors), causing unwanted litter/littering issues. Sustainable and circular design and proper end-of-life management of such plastics, envisaged in European and national legislations, should also reduce the danger of microplastic pollution in the environment and in the human food chain”.**
- Justification: As mentioned in the Directive on the reduction of the impact of certain plastic products on the environment, plastic provides essential applications in many sectors. However, because of its short-lived applications not designed for re-use or cost-effective recycling, plastics has significant negative environmental and health impact. Since plastics

are used extensively in the food system (e.g. packaging), it is important to mention the plastic issue in the Farm to Fork Strategy.

Page 7 (fourth paragraph): addition.

- Add “**The deployment of a circular and sustainable EU Bioeconomy provides opportunities to develop more sustainable food packaging and food waste valorisation**”, at the end of this paragraph on circular business models.
- Justification: The section focuses on promoting sustainable practices. The paragraph focuses on circular business models. The updated Bioeconomy Strategy points to economic benefits linked to sustainable and circular food and bio-based sectors. As such, a reference is needed.

Page 7 (fifth paragraph): comment.

- The 5th paragraph on nutrient profiles should be moved up above the paragraph on competitive advantage and below the paragraph on dietary choices.
- Justification: Diets and nutrient profiles are closely related subjects.

Page 8 (fifth paragraph, line 1-2): Additions.

- “(...) to promote healthy and sustainable diets in institutional catering **and gastronomy sector**, the Commission will **set minimum mandatory criteria for sustainable and healthy food procurement**”.
- Justification: the gastronomy area (restaurant, cooking schools, etc.) is not mentioned at all in the Strategy but they are an important part of the food system through which communication and education on food systems could be promoted.

Page 9 (third paragraph, lines 4-5): Add “and food waste along the whole supply chain”.

- “The Commission will investigate on the extent and causes of **food losses** (i.e. losses at the production stage) **and food waste along the whole supply chain**”.
- Justification: It is important to measure food waste first for an effective prevention.

Page 10 (second paragraph, line 4): modification of a sentence.

- Replace “imagery by artificial intelligence to allow for more precise planning of **farming** operations and monitoring of the condition of **farmland** in aspects (...)” with “imagery by artificial intelligence to allow for more precise planning of **primary production** operations and monitoring of the condition of **land and seas** in aspects (...)”.
- Justification: The reference to the spatial and data systems supporting the farmland services excludes the marine one. A reference to the opportunities of using Marine Data bases could be included into the text.

Page 10 (fourth paragraph, 7th line): additions.

- “It will develop an SME-friendly Sustainable Manual for food processor, ~~and for~~ **retailers and food services** to disseminate best environmental **and health** management practices”.
- Justification: The Sustainability Manual should also be for food services (catering and gastronomy sector) and should be geared to best environmental and health management practices in relation to food systems.

Page 11 (third bullet point): add “, strengthen the AU-EU research and innovation priority on food and nutrition security and sustainable agriculture”.

- “Build on the EU Strategy with Africa, **strengthen the AU-EU research and innovation priority on food and nutrition security and sustainable agriculture** and develop a common approach on sustainable food systems with African partners and implement the actions agreed following the work of the Task Force for Rural Africa; a particular focus will be to strengthen marine cooperation with African countries, many of which will suffer severe losses of marine resources due to climate change, under the forthcoming EU–Africa partnership”.
- Justification: We are committed to implement the 10 year roadmap 2016-2026 agreed in the EU-AU High Level Policy Dialogue on Research and Innovation. As such, this work is fully in line with the EU Strategy with Africa.

Page 12 (first paragraph, line 2-3): add “and healthy lives”.

- “Food systems can be a driving force for sustainability **and healthy lives**”.
- Justification: The Farm to Fork Strategy aims to improve the food system and decrease its impact both on the environment and on health. The text clearly mentions the environmental aspects and the notion of sustainability, but the health aspects should not be forgotten.

Annex (Action Plan): comment.

- We would need to establish a link in between each action of the Action Plan and the targets. A possibility would be to add a column to make this link.
- Justification: The aim of the Action Plan is to put in place actions that would contribute to achieve the defined targets. As long as there is no clear link between the actions and the targets, the usefulness of the Action Plan cannot be fully understood.

Annex (Action Plan): comment.

- None of the actions concern the CAP. But the CAP, the CFP and the Farm to Fork Strategy are closely linked. An action focusing on this link would be welcome.