



EUROPEAN COMMISSION  
EUROSTAT

The Director-General

Luxemburg, 11.03.2020

**ANNEX TO THE REPLY OF DG ESTAT**

**AVAILABLE ON DECIDE**

**Interservice consultation initiated by:** DG SANTE

**Reference:** ISC/2020/01398 (Ares(2020)1333725)

**Title:** Commission Communication on 'A Farm to Fork strategy – For a fair, healthy and environmentally-friendly food system'

**Contact person in the DG:** [REDACTED]

- **Positive opinion with comments**

**Comments:**

Thank you for consulting Eurostat.

In the cover note, you asked for the possible timeline for adoption for the actions falling within the remit of Eurostat. This concerns action number 4. The basic legal act for this action is in preparation with the intention of having it adopted by the Commission at the beginning of the next year. Once the basic act is agreed between the co-legislators, the implementing acts can be formally proposed; these include the revision of the pesticides statistics regulation. We estimate that this will take place in 2023, although the draft implementing acts are already discussed with the Member States since 2019.

In the draft Farm to Fork strategy document, we find that sources to numbers are often not official sources but stem from stakeholder publications or lack a defined basis. We think this is a risk for reputational damage for the Commission. Instead of using official data, we find that publications of e.g. Greenpeace ('71% of UAA used for meat and dairy') have been used to write this strategy. Eurostat is able to provide official data and/or estimates based on official statistics but Eurostat has not been sufficiently involved in the preparation of the document, which has taken place in a non-transparent way. The texts we have received for the ISG meetings have been different in structure and contents. The message given in the ISG meetings has been that the papers should be based on facts; therefore we provide below the data available in the limited time of the

inter-service consultation.

- Section 1, 3<sup>rd</sup> paragraph. According to the draft strategy, 71% of the UAA in the EU is used for meat and dairy production. No source is given in the document. This is well above the FAO assessment (<https://www.sciencedirect.com/science/article/pii/S2211912416300013> , [http://www.fao.org/ag/againfo/home/en/news\\_archive/2017\\_More\\_Fuel\\_for\\_the\\_Food\\_Feed.html?platform=hootsuite](http://www.fao.org/ag/againfo/home/en/news_archive/2017_More_Fuel_for_the_Food_Feed.html?platform=hootsuite) ) and is quite likely based on incorrect assumptions. The share of produced crops that is actually used for feed should not be mixed up with areas. By-products from the food industry, such as oil cake from oil seed pressing and by-products of cereals, are regularly used for feed. This feed use is essentially a way of reducing food waste. When referring to crop areas aimed at meat and dairy production, the strategy should take into account only the **direct feed use**, not a percentage according to the volume of by-products. This is also the view of FAO, in the reports cited above. According to Eurostat rough estimations, based on the available crop production statistics, including the EU and FAO crop balances, the maximum percentage of areas of various crops dedicated to feed production are those in the table below.

Crop/land cover type	Estimated maximum percentage of area dedicated to feed production
Common wheat and spelt	21.5%
Durum wheat	9.3%
Barley	53.6%
Grain maize	77.4%
Other cereals	39.3% (average of the cereals above, likely too high)
Rape seed	6.5% (according to FAO database)
Sunflower seed	5.4% (according to FAO database)
Soya	100% (considering the huge imports)
Plants harvested green from arable land	100%
Permanent grassland	100%
Arable land	44.1%
Utilised agricultural land	57.7%

- Section 1 paragraph 6: This section claims that crop production is declining. Eurostat official statistics contradicts such a statement. Please refer to the recent article on Agriculture production – crops [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agricultural\\_production\\_-\\_crops](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Agricultural_production_-_crops) where the last 10 years (2008-2018) available statistics show a stable crop production with annual variations, most likely depending on weather. The total area of arable land was stable or slightly decreasing in the same time period ([https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=apro\\_cpsh1&lang=en](https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=apro_cpsh1&lang=en)) which therefore does not support the statement about a declining crop production.

Section 1, 7<sup>th</sup> paragraph: In the EU27, the number of citizens that can not afford a

quality meal every second day is 33 million (reference: Eurostat, EU SILK, 2018 [https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=ilc\\_mdes03&lang=en](https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=ilc_mdes03&lang=en))

- Section 1, 7<sup>th</sup> paragraph: the correct source to the statement about overweight adult population should be indicated as [https://ec.europa.eu/eurostat/databrowser/view/sdg\\_02\\_10/default/table?lang=en](https://ec.europa.eu/eurostat/databrowser/view/sdg_02_10/default/table?lang=en)
- Section 1, next to last paragraph: This section claims that ‘the average EU farmer currently earns around half of the average worker in the economy as a whole’. We think it is necessary to add a reference to support this statement to clarify where these data come from. In case this statement refers to CAP Context indicator C.26 on Agricultural entrepreneurial income ([https://agridata.ec.europa.eu/Qlik\\_Downloads/Jobs-Growth-sources.htm](https://agridata.ec.europa.eu/Qlik_Downloads/Jobs-Growth-sources.htm)), the reference should cite CAP Context indicator C.26 (not “Eurostat” as C.26 explains a mix of sources). However, please note that it is not correct to state that these are **the earnings** of a farmer. Measurement of farmers’ income from agricultural activities are conceptually different from average wages in the economy. Reliable data on full-time equivalent labour statistics for the total economy for some Member States are also lacking.
- Section 2.3 supports a change towards a more plant-based diet with less meat. At the same time the strategy targets a large (XX%) increase in organic farming. Please note that EU organic farming area today is mainly grassland, i.e. linked to livestock farming. In 2018, EU-27 total organic agricultural area was made up of 43% permanent grassland (mostly used for grazing organic livestock), of 46% arable land including green fodder and the share of cereal used for fodder) (the remaining area is permanent crops which are mainly used for human consumption), [https://ec.europa.eu/eurostat/statistics-explained/index.php/Organic\\_farming\\_statistics](https://ec.europa.eu/eurostat/statistics-explained/index.php/Organic_farming_statistics). This data shows that you must be aware of the **somehow competing targets to increase organic farming while decreasing livestock production**. Decreasing livestock production will make grassland areas superfluous for farmers and these might be ploughed up, hereby losing valuable carbon storage opportunities (<https://esajournals.onlinelibrary.wiley.com/doi/pdf/10.1002/eap.1473>, [https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri\\_fg\\_grazing\\_for\\_carbon\\_final\\_report\\_2018\\_en.pdf](https://ec.europa.eu/eip/agriculture/sites/agri-eip/files/eip-agri_fg_grazing_for_carbon_final_report_2018_en.pdf)) and farmland biodiversity (<https://link.springer.com/article/10.1007/s10531-013-0537-x>). They could also be abandoned (<https://ec.europa.eu/jrc/en/publication/euro-scientific-and-technical-research-reports/agricultural-land-abandonment-eu-within-2015-2030>) and hence reduce the reported agricultural areas under organic farming. We should consider that livestock play a critical role in the Circular Economy (<https://www.sciencedirect.com/science/article/pii/S2211912416300013>, <http://www.fao.org/3/a-i8098e.pdf>).
- The strategy targets a reduction of fertiliser use (XX%). It is not clear to us how will this be measured. Eurostat currently collects statistics on fertilizer consumption and gross nutrient balances but not all countries participate in these voluntary data collections. Therefore, the existing datasets are not complete for EU-27. We are preparing to include them in legislation that will be proposed by 2023 (implementing acts under the forthcoming regulation on statistics on

agricultural inputs and outputs), but we cannot pre-empt the outcome of the co-legislators work. If other new data collections are planned to be set up outside of the statistical system, Eurostat must be consulted.

- The targets on pesticides and on organic farming marked with XX% are in the same situation as the ones in the draft Biodiversity strategy, also marked by XX. When and how these targets will be established?

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Copies:

