



EUROPEAN COMMISSION
Inspire, Debate, Engage and Accelerate Action

IDEA

Brussels,
IDEA.B. [REDACTED]

**NOTE FOR THE ATTENTION OF
DG SANTE**

Subject: Reply to the Interservice Consultation on the on the Farm to Fork Strategy for a Sustainable Food System. Ref.: ISC/2020/01398

Thanks a lot for having consulted I.D.E.A. in this Interservice process. We support the proposal and would like to make some additional comments:

There are **a lot of positive and concrete elements for regulation/targets**. Of course, the ambition is very depended on the final targets. And we might need **more incentives**.

The main problem we see is that there is only a very **weak link to the current CAP proposal/funding**. You get the impression that we try to put something on agriculture on paper without touching agriculture. It would be good to improve the wording here – as far as possible.

This problematic includes a **very shy reference to dairy/meat production**. Of course, it's understandable and we should not come with a bulldozer right away, but couldn't we at least in the long list of actions also have an action plan announced to look into the reduction of meat and dairy consumption?

Maybe it would be worth to take already some points in the strategy where CAP needs improvement without coming with a new proposal. Here some ideas what these elements could be:

- Provide sufficient support for effective instruments to maintain biodiversity and ecosystems (10% target for nature and semi-natural habitats – as in the biodiversity strategy); AECM and Eco-Schemes
- Promote innovative approaches
- Require Member States to set SMART targets in their Strategic Plans
- Revise the set of indicators
- Strengthen monitoring and enforcement

Positive incentives for both strategies/How to bring the farmers/fishermen-women along

Here are two ideas how to bring a more positive and less regulatory spirit to the strategy. On top of this, please see the proposal above on labelling/award system which can be very powerful as well. These ideas could also fit in the biodiversity (also sent to that ISC).

We could commit to looking into the **creation of a system of payments for land stewardship to reward farmers and foresters for looking after biodiversity and carbon stocks/sinks**. This might go into the direction of the “Eco schemes” foreseen in the CAP proposal but would be much stronger.

Study/impact assessment would probably be needed to look at how to properly reward, also in terms of income/making a living those that maintain habitats such as biodiversity rich permanent grasslands, natural forests and wetlands. A **special attention could be given to those who care of Nature 2000 sites**. Such an analysis would probably show that you need to replace direct payments with payments for ecosystem services and much of the farm lobby won't be enthusiastic. But it could create a venue for a more fundamental debate on the future of the CAP outside the current blocked dynamic.

This idea comes up also in the paper signed by 3600 scientists. They would like to see it introduced already in the current CAP proposal with funds to “support innovative approaches to design and implement measures addressing environmental challenges”. Another possible “help” could be to pay an **“administrative top up”** to Member States/regions/... who put in place concrete biodiversity measures that need a higher level of administration. Studies on this have been done in the past and could be used if needed.

A similar action plan could be announced to look into how to **better involve local coastal and fishing communities in ocean restoration, management of marine protected areas and management of fish stocks**.

Another concrete thing for the fishing community could be a plan to **support plant/algae/insects based aquaculture** that is independent from reliance on wild fish. This could position the EU sector in global leadership position, create growth opportunities and give the sector a way to live up to its promises of sustainability. The plan could also look at opportunities to **combine aquaculture with the circular economy** (eg food waste recycling), renewable energy (synergies with offshore wind, pumped storage, cooling systems) and nature restoration (artificial wetlands with a biodiversity and ecosystem value that also produce fish).

Yours sincerely,

