



# SUSTAINABLE FOOD SYSTEMS IN THE EU STRATEGY

Assessing Farm to Fork & Fit for 55

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## 1. Introduction

**The Covid-19 pandemic has brought up the necessity of a concerted global effort** toward the achievement of a sustainable world food system. Realigning it to deliver better health and environmental outcomes will be among the most important global challenges of the 21st century<sup>1</sup>. Nevertheless, this fundamental goal has to be reached while taking into consideration the existing gaps between different areas of the world in terms of income, natural resources (including food and cultivation), farming and industrial capacities, and food culture.

**Sustainable Nutrition policies can provide the best response to the issues here highlighted, by working to provide secure and healthy food in a wholly sustainable way.** Sustainable Nutrition aims to provide nutrient-dense foods to societies across the world in a manner that is affordable and culturally respectful. All while reducing the environmental externalities of food production and preserving biodiversity from environmentally aggressive agricultural practices.

At the European level, the importance of a sustainable food system has been recognized and enshrined in the 2020 **Farm to Fork Strategy (F2F)**, as part of the Green Deal presented by the European Commission in late 2019. In July 2021, the legislative package **Fit for 55** was proposed by the Commission to ramp up the mitigation efforts needed to reach the overarching goal of 55% reduction of GHG emissions by 2030. Although Fit for 55 does not address sustainable nutrition directly, some elements of emission reductions address (or fail to address) agricultural production.

While important steps in the direction of an ever-greener Union and of the creation of a sustainable food system in Europe and beyond, F2F and Fit for 55 feature weaknesses that risk to undermine a truly sustainable food system's fairness, effectiveness and accessibility. What follows is an **overview of the two policy instruments and an analysis of their shortcomings as well as potential solutions.**

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<sup>1</sup> Hirvonen et al., *Affordability of the EAT–Lancet reference diet: a global analysis*, The Lancet Global Health, Volume 8, Issue 1, E59-E66, January 01, 2020.

### *Box 1 - Policy Recommendations*

1. Sustainability standards should be exported through provisions along the entirety of supply chains in order to avoid carbon leakage and issue displacement;
2. Sustainable nutrition must be socially equitable, ensuring alternative livelihoods in areas threatened by climatic change and making healthy diets affordable for all;
3. Policies aimed at greening agricultural and livestock production should be object of thorough impact assessment in order to minimize adverse consequences on producers and consumers alike;
4. Front-of-package labels should be informational and aimed at educating consumers on how to make informed choices that are the healthiest for their own individual needs by combining different products;
5. Innovations in sustainable nutrition must take into account local food sensitivities and socio-economic models to ensure fairness and efficacy.

## 2. Farm to Fork Strategy

**Farm to Fork Strategy (F2F) proposes to green European food production** by setting the following goals for 2030:

1. 50% reduction of dependency on pesticides;
2. 50% reduction of antimicrobials usage;
3. At least 20% reduction of excess fertilization;
4. At least 25% increase in organic share of total EU farmed lands.

Furthermore, it covers the following other areas of action:

1. Improvement of animal welfare;
2. Improved sustainability in fish and seafood sectors
3. Reversal of biodiversity loss trend;
4. Integration of CAP's 9 objectives in Member States' Strategic Plans upon recommendation by Commission;
5. Clarification of competition rules and monitoring of the implementation of the unfair trading practices (UTPs) directive;
6. CO2 sequestration on farms.

The strategy looks **further along the food supply chain** to improve sustainability in **food distribution and consumption** (*see detailed objectives in table below*).

Importantly, it aims at influencing citizens' consumption patterns in a way that favors products with a low carbon footprint and high nutritional value. Main goal is to address both the environmental and public health challenges that requires new measures and consumption policies. The EU Commission is programming the launch of a harmonized Front-of-Package Label (FoPL) including such information, to be implemented by the end of 2022 across the Union<sup>2</sup>.

Due to the global nature of environment, food systems and agricultural trade, F2F sets out the definition of **Green Alliances** between the European Union and third countries or regional blocs. **The Alliances' objective is to set standards of sustainability** along the agricultural production chains of all EU's partners, so as to avoid the externalization of unsustainable farming practices as well as the loss of competitiveness of European exports in the global market. Unsustainable practices concern not only the usage of pesticides but also the loss of biodiversity through deforestation. In order to tackle these negative externalities, the EU is presenting a new regulation proposal by 2021 that would attenuate or altogether eliminate the presence of forest-intensive products in the EU market.

*Table 1 - Progress on key goals of F2F Strategy as of July 2021*

Scope	Key Goal	Deadline	Action
Food production	CAP recommendations	Q4 2020	Recommendations made in December 2020 to each EU country for tailor-made ways to integrate CAP objectives in national strategic plans
	Pesticides reduction	Q1 2022	Public consultation on the revision of EU directive on pesticides
	Animal welfare improvement	Q4 2023	Ongoing fitness check of EU animal welfare legislation following an evaluation published in March 2021
	Fertilizers reduction	Q4 2021	Public consultation on feed additives rules

<sup>2</sup> European Commission, REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL regarding the use of additional forms of expression and presentation of the nutrition declaration, COM(2020) 207 final.

	Competition rules and producers' position in the food chain	Q4 2022	Enhanced producer cooperation is expected from the adoption of EU legislation on the CAP (above all the rules on the organisation of agricultural markets) and on fishery and aquaculture
	Carbon farming initiative	Q3 2021	In April 2021, the Commission published a study on carbon farming in the EU; initiative set to launch by end of 2021
Food distribution and consumption	Corporate governance and code of conduct	Q2 2022	Ongoing development of code of conduct for responsible business and marketing practices
	Nutrient profiles	Q4 2022	Public consultation planned for Q4 2021
	Harmonised front-of-package nutrition labelling	Q4 2022	Public consultation planned for Q4 2021

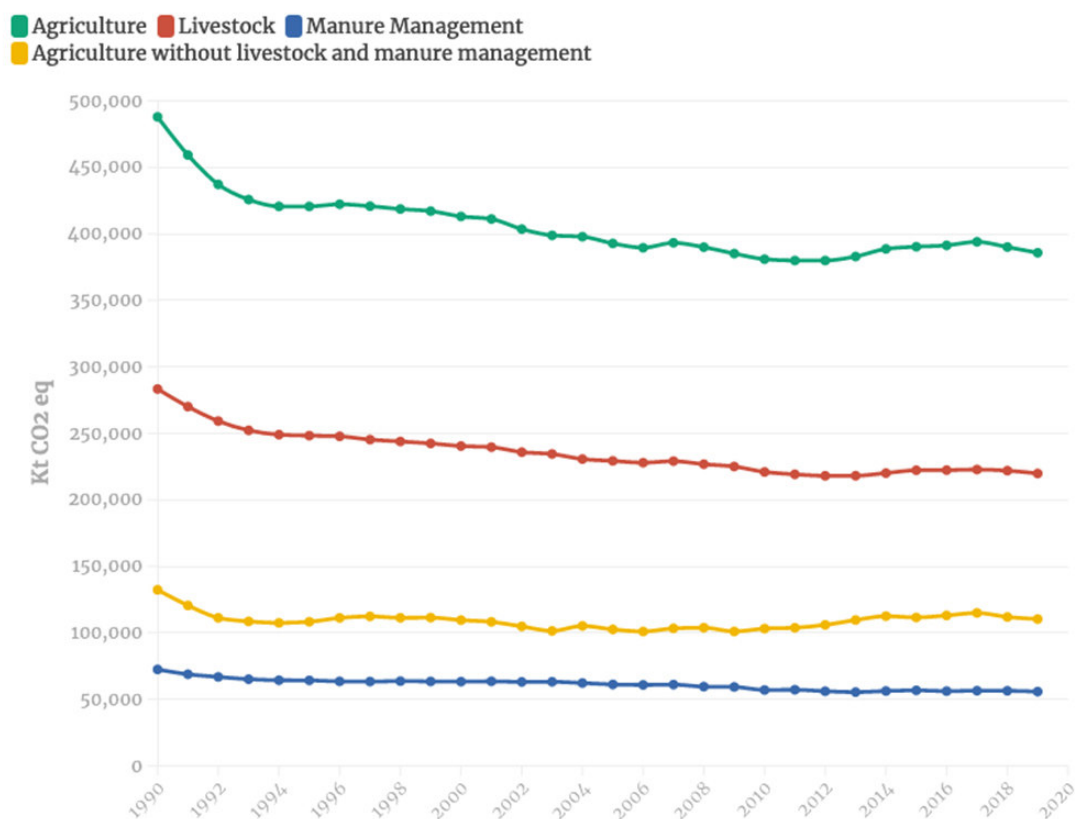
## 2.1 Shortcomings

- I. The EU's Common Agricultural Policy (CAP) has so far failed to produce a sustainable food system and F2F has been criticized for failing to address the major cause of GHG emission in the farming sector: livestock farming. Production and consumption of meat and dairy is estimated to account for about 7% of EU's total GHG emissions and has failed to decrease since 2010<sup>3</sup>. Other collateral effects include air pollution from ammonia in animal waste and biodiversity-intensive land use for grazing and farming purposes. Reduction of livestock emissions is possible along two axis: (1) a change in consumers' diets with a significant decrease of meat and dairy consumption toward plant-based alternatives; (2) the implementation of technologies that are more efficient and of sustainable practices in feeding, livestock and manure management<sup>4</sup>.

<sup>3</sup> European Environment Agency, *EEA greenhouse gases – data viewer*, published 13 April 2021.

<sup>4</sup> FAO, *Tackling climate change through livestock*, 2014.

Table 2 - Emissions from Agriculture and Livestock, 1990-2019



Source: European Environment Agency, 2021

- II. Changing consumer diets toward sustainable and healthy alternatives is indeed a goal of F2F, encompassed in the harmonized FoPL goal. However, **the line between influencing and dictating consumer choices should be walked carefully**, and the choice of the appropriate label is instrumental in determining the right approach. Dictating a single, harmonized diet that ignores individual needs and deficiencies by systematically favoring certain products over others may not be effective in improving the health or nutritional education of European citizens. It can also be perceived as a paternalistic move to control citizens' habits.
- III. The goal to expand organic production to account for 25% of land use by 2030, a significant jump forward from the current 8%, has drawn **criticism regarding the compatibility of two goals: sufficient and affordable food on one hand, and increased organic production on the other**, which

**yields fewer crops and at higher prices**<sup>5</sup>. If reliance on imports is to be avoided, it is expected that a significant increase in total land use would be necessary to match current levels of food availability, therefore offsetting the carbon efficiency that a single organic yield has on a traditional one. European farmers have also raised concerns about the increase in consumer prices of organically grown agri-food products, which risks eroding their competitiveness<sup>6</sup>.

- IV. The creation of a global sustainable food system requires the promotion of Europe's green policies beyond its borders. Trade and the creation of sustainability standards for importers are valuable instruments to encourage sustainable practices, but they must be **careful not to become discriminatory against a specific product or to blacklist a producer who engages in unsustainable practices**. In this respect, the goal of Green Alliances to remove forest or emission-intensive products from the EU market risks to backfire, displacing the unsustainable product toward other markets rather than incentivizing the transition toward more sustainable practices.
- V. A final, overarching weakness of Farm to Fork is the **lack of impact assessment that continues well after one year since the launch of the initiative**. In May 2021, a group of thirty-one European stakeholders raised concerns about F2F negative consequences on the productiveness and competitiveness of European agri-food products and the lack of sufficient assessments of the social and economic impacts that the implementation of the strategy would cause.<sup>7</sup>

### 3. Fit for 55

**Fit for 55** is a package of proposals that aims to align EU's energy, climate, transport, land use and taxation policies with the **objective of reducing GHG emissions by 55% before 2030**<sup>8</sup>. The key features of the proposal are the following:

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<sup>5</sup> Baker, M., *EU food policy: the triumph of dogma over pragmatism*, Innovation Forum, May 14, 2021.

<sup>6</sup> Morrison, O., *What does the farm-to-fork strategy mean for the future of food in Europe?*, Food Navigator, May 22, 2020.

<sup>7</sup> Copa-Cogeca, *Joint Declaration*, May 20, 2021.

<sup>8</sup> European Commission, *European Green Deal: Commission proposes transformation of EU economy and society to meet climate ambitions*, July 14, 2021.

- I. Strengthening of the European Emission Trading System and of the Effort Sharing Regulation;
- II. Introduction of the Carbon Border Adjustment Mechanism (CBAM);
- III. Introduction of the Social Climate Fund;
- IV. Increased goal of 40% share of energy from renewable sources by 2030;
- V. Revision of EU Forest Strategy to better the quantity, quality and resilience of European forests. The package will be examined in the European Parliament over the next couple of years and a **resolution is expected to come by 2023**.

Among the proposed measures, the **Carbon Border Adjustment Mechanism (CBAM)** stands to impact food systems and the sustainability of nutrition the most. CBAM envisions a **carbon tax** to be paid by European importers on products made outside of the Union. The tax would be equal to the carbon price that would have been paid by European producers if the product had been made following European carbon pricing rules. For now, the proposal would only apply to a restricted group of commodities such as **iron, aluminum, cement, electricity and fertilizers**, although the scope could be extended after the end of the transition phase in 2026.

### 3.1 Shortcomings

Although the goal of the whole package is to address carbon leakage and protect the competitiveness of European products, the **exclusion of agri-food from the list has raised concerns** from stakeholders and observers who fear that imports from EU's biggest competitors will continue benefitting from the constraints of domestic production. Furthermore, the inclusion of fertilizers has been highly contested by farmers associations: **nitrogen fertilizer is the main variable cost item** for European cereal and oilseed production<sup>9</sup> and imports from Eastern Europe and North Africa amount to about 30% of EU consumption<sup>10</sup>. If prices were to skyrocket due to the carbon tax, European agriproducts' competitiveness would be harmed by the higher costs of production. Higher purchasing prices would also limit accessibility, and therefore social sustainability, of nutritious foods.

Despite many agriculture and nutrition interest groups finding the initiative lacking, the scope of the Mechanism is intended to widen after the end of the transition period in 2026, leaving the door open for agri-food to be included among the list of taxable imports.

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<sup>9</sup> Lambert, C., *Carbon leakage devastating for European agriculture*, Future Farming, March 9, 2021.

<sup>10</sup> Fertilizers Europe, *Facts and Figures*, 2019.

## Other issues

- I. Developing states have raised concerns regarding Fit for 55 and CBAM, which they believe violates the principle of Common but Differentiated Responsibility by imposing European standards of sustainability on countries still lagging behind in green technology and innovation<sup>11</sup>.
- II. Trade deviation and carbon leakage remains a concern: carbon-intensive exporters could find other, tax-free markets for their products and the European Union would need to compensate with increased domestic production.
- III. Border adjustments are likely to lead to an increase in consumer prices<sup>12</sup> although the impact of taxing raw materials of the kind cited above on the final price of consumer products has not been gauged yet.

## 4. Policy Recommendations

F2F and Fit for 55 present some tools to reinforce European leadership in the fight against climate change, the achievement of the Paris Agreement targets, and the consolidation of sustainable food systems and supply chains. However, **some critical junctures must be addressed in order for sustainable nutrition to be fair, accessible, and effective.**

1. Exporting sustainable practices to other markets (not EU) should not be pursued through the limitation or ban of certain products deemed unsustainable: this practice risks displacing forest and CO<sub>2</sub>-intensive production while not necessarily incentivizing the adoption of sustainable practices. Sustainability provisions should be embedded all along supply chains and reinforced through trade agreements.
2. Sustainable nutrition should devote attention to promoting alternative sources of nutrition and livelihood in the areas of the world most vulnerable to the adverse impact of climate change to avoid compounding an environmental crisis with a health one. Nutrition must be socially equitable, striving to make healthy diets and foods affordable for the world's poor:

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<sup>11</sup> South African Government, Joint Statement issued at the conclusion of the 30th BASIC Ministerial Meeting on Climate Change hosted by India on 8th April 2021.

<sup>12</sup> Kortum, S. and Weisbach, D., *Border Adjustments for Carbon Emissions: Basic Concepts and Design*, Resources for the Future Discussion Paper 16-09, 2016.

currently, most of the sustainable diets are unaffordable for 1.58 billion people, with fruits and vegetables accounting for the largest share of cost<sup>13</sup>.

3. For sustainable and healthy nutrients to be accessible to all, policies aimed at greening agricultural and livestock production should be thoroughly examined and their impact on final consumer prices assessed. Citizens cannot bear the burden of higher production costs for organic practices as it risks turning them, and especially those most vulnerable, away from the healthiest nutritional choices.
4. Proposals for FoPLs should aim at providing European consumers with clear and transparent nutritional information on the product at hand, without assessing it as wholly ‘good’ or ‘bad.’ Discrimination against certain ingredients in the form of a negative score or judgment should be avoided, especially when their moderate consumption does not negatively affect health. Instead, labelling should aim to inform about the impact of a nutrient on the environment. In parallel, consumers should be guided on how to use descriptive nutrient profiles to make the decisions that are healthiest for their individual needs while minimizing environmental footprint.
5. When re-imagining a healthy and sustainable diet for consumers beyond Europe, local food sensitivities and socio-economic models must be taken into account. Although there is evidence for consumers’ desire to move away from red meat and dairy and toward plant-based diets in Europe, the same cannot be assumed for societies that are heavily dependent on agropastoralism for their livelihood.

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<sup>13</sup> Hirvonen et al., *Affordability of the EAT–Lancet reference diet: a global analysis*, The Lancet Global Health, Volume 8, Issue 1, E59-E66, January 01, 2020.

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## ABOUT THE SUSTAINABLE NUTRITION PLATFORM



### Mission

We develop and advocate for innovative, original policies in favor of the production of healthy nutrients grown in the most sustainable way.

### Vision

The fast-growing world population (already 7.6 billion!) deserves a healthy, safe diet capable of providing the correct and most effective nutrients, as recommended by the FAO. We are starting to see more and more promising innovative technologies with a low impact on the environment but they are still largely in the future.

Most of the world's population still has to rely on existing nutrients that require land and natural resources, including the employment of animal and human labor. Also, while humans in many parts of the world have been able to prosper and experience poverty reduction, their impact on the environment has been devastating, as the unforeseen and shocking speed of climate change demonstrates.

### Future Policies

Future policies will have to restore some balance to the relationship between mankind and the environment by finding a way to develop more efficient nutrients so as to obtain what is needed in a daily diet in more sustainable ways.

Learn more about the Sustainable Nutrition platform:

<https://www.competere.eu/sustainable-nutrition/>



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