



## ANALYSIS ON FARM TO FORK STRATEGY

**Attention:** *this document does not express an AREPO political position. It simply is a first technical analysis realised by AREPO services.*

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### 1. A NEW CONTEXT: EUROPEAN GREEN DEAL

On December 11<sup>th</sup> 2019, the new Commission President Ursula von der Leyen has presented the [European Green Deal](#), Europe's roadmap for green transition that should help cut emissions, create jobs and open up new opportunities in a fair way.

The [Communication](#) details a comprehensive and ambitious package of measures touching several policy areas, among other **food policy**. In this regard, the document attributes to 'Farm to Fork' (F2F) strategy the challenge of designing a fair, healthy and environmentally-friendly food system.

**This strategy should “set out the regulatory and non-regulatory measures needed to create more efficient, climate-smart systems that provide healthy food, while securing a decent living for EU farmers and fishermen”.** In particular, the Communication on the European Green Deal states the ambition to “**make European food [...] the global standard for sustainability**”.

### 2. INTRODUCTION ON FARM TO FORK STRATEGY

On May 20<sup>th</sup> 2020, the Commission published the long awaited [communication and draft action plan of the Farm to Fork strategy](#). [Click here to consult AREPO feedback to the Roadmap published on February 2020](#).

In line with the priorities set by the European Green Deal, the Communication set the following overall and specific objectives and target for 2030:

**Overall objective:** “**to reduce the environmental and climate footprint of the EU food system and strengthen its resilience, ensure food security in the face of climate change and biodiversity loss and lead a global transition towards competitive sustainability from farm to fork and tapping into new opportunities**”.

#### SPECIFIC OBJECTIVES

#### TARGETS FOR 2030

- Ensuring **sustainable food production**
- Ensuring **food security**
- Stimulating **sustainable food processing, wholesale, retail, hospitality and food services practices**
- Promoting **sustainable food consumption** and facilitating the shift to **healthy, sustainable diets**
- Reducing **food loss and waste**
- Combating **food fraud** along the food supply chain

- **reduction by 50%** of the **use and risk of chemical pesticides**
- reduction by 50% of the use of **more hazardous pesticides**
- **reduction of nutrient losses by at least 50%**
- reduction of the use of fertilisers by at least 20%
- **reduction by 50% of the sales of antimicrobials** for farmed animals and in aquaculture
- **reaching 25%** of agricultural land under **organic farming by 2030**



## New policy & enforcement of existing legislation

In order to achieve these objectives and realise these targets the F2F strategy involves a **new set of policy initiatives**, as well as the **enforcement of existing legislation**, notably for animal welfare, pesticide use and protecting the environment legislation.

In particular, **the Commission will make a legislative proposal for a framework for a sustainable food system before the end of 2023 (action 1)**.

This new legislative framework will aim at:

- **accelerating and facilitating the transition** and ensure that all foods placed on the EU market become increasingly sustainable;
- promoting **policy coherence** at EU and national level, mainstreaming sustainability in all food-related policies;
- strengthening the **resilience** of food systems.

The framework will contain **common definitions and general principles** and **requirements** for sustainable food systems and foods. Furthermore, it will address the **responsibilities of all actors** in the food system.

### 3. A PRELIMINARY ANALYSIS OF F2F STRATEGY OPPORTUNITIES AND THREATS

The Communication is structured in two parts. The first part describes the **actions** related to the specific objectives of the strategy, while the second relates to the **enablers** of the strategy, that is its governance.

The following analysis will focus on the first part, with a particular attention to the **opportunities and threats related to AREPO mission and working areas**. A full list of objectives and related actions is available in the synthetic table in the annex.

#### Geographical Indications (GIs)

The Commission Communication on Farm to Fork strategy includes Commissioner Wojciechowski priority to **strengthen the system of geographical indications**. In particular, this priority is mentioned twice:

1. The Commission proposes to clarify the scope of competition rules in order to **facilitate the setting up of collective initiatives that promote sustainability in the supply chains (action 10)**.

**Timeline:** Q3 2022

Furthermore, the EC intends to **help farmers and fishers strengthening their position in the supply chain and to capture a fair share of the added value** of sustainable production by encouraging the possibilities for cooperation within the common market organisations for agricultural products and fishery and aquaculture products (**action 11**).

**Timeline:** 2021-2022

As part of these actions, the Commission **will also work with co-legislators to improve agricultural rules that strengthen the position of farmers** in the food supply chain, like EU quality schemes.

2. The Commission will work on a **proposal for a revision of EU marketing standards** for agricultural, fishery and aquaculture products, to provide for the uptake and supply of sustainable agricultural, fisheries and aquaculture products and to **reinforce the role of sustainability criteria (action 18)**.

**Timeline:** 2021-2022

As part of this action, the Commission will **strengthen the legislative framework on GIs** and, where appropriate, **include specific sustainability criteria**.



**Analysis:** This represents an **opportunity for AREPO to put forward its priorities and proposals**, as defined in the [position paper concerning the evaluation of EU quality schemes](#). Furthermore, the inclusion of sustainability criteria in the EU quality policy could help recognising as well as promoting GIs potential in term of environmental, social and economic sustainability. Nevertheless, care must be taken **not to jeopardise** the legal justification for GIs exceptionality under intellectual property law, i.e. the **link to the territory**.

### Promotion policy

The Commission is currently undertaking a review of the EU promotion policy for agricultural products. In line with F2F priorities and objectives, this reviews will focus in particular in **enhancing the policy contribution to sustainable production and consumption**, in line with evolving diets ([action 24](#)). In relation to meat, that review will focus on how the EU can use its promotion programme to support the most sustainable, carbon-efficient methods of livestock production.

**Analysis:** This priority represents both an **opportunity and a threat for GIs**.

On one hand, **GIs protection is often associated with the production of public goods**, such as conservation of biodiversity, contribution to animal welfare, protection of cultural heritage, socio-cultural and rural development and reduction of poverty, in particular in mountainous and remote regions, where the farming sector accounts for a significant part of the economy and production costs are high. AREPO should focus on this message to highlight that, **as an instrumental sustainability tool, GIs should be the main priority of the future promotion policy**.

On the other hand, carbon efficiency, if used as the main criteria to measure and evaluate sustainability, could be a mayor threat for GIs. Traditional products in general do not score better than industrial ones on this criteria. **AREPO should insist that GIs sustainability cannot be reduced to carbon efficiency**. It would be too reductive and harmful. An **holistic approach** is needed, taking into account **all the dimensions of sustainability**.

### New food labelling initiatives

In order to inform consumers and empower them to make healthy and sustainable food choices, the Commission will consider options for **several new food labelling initiatives**:

1. Under the evaluation and revision of the existing animal welfare legislation ([action 7](#)), the EC will consider options for **animal welfare labelling**. **Timeline:** Q4 2023

For more information on the revision process, [click here to consult the Roadmap for the Fitness check of the animal welfare legislation](#).

2. In 2022, the EC will publish a **proposal for a harmonised mandatory front-of-pack nutrition labelling** ([action 20](#)). **Timeline:** Q4 2022

For more information on this proposal, click here to read the EC [Report on front-of-pack nutrition labelling](#).

3. Furthermore, with the same deadline, it will work on a **proposal to extend mandatory origin indication to certain products** ([action 21](#)). **Timeline:** Q4 2022
4. Finally, the EC will also examine ways to harmonise voluntary green claims and to **create a sustainable food labelling framework** that covers the nutritional, climate, environmental and social aspects of food products ([action 23](#)), to enable consumers to make health conscious and sustainable food choices, benefiting their health and quality of life, and reducing health-related costs. **Timeline:** 2024

**Analysis:** AREPO should **attentively monitor** the implementation of all these actions in order to **assure their coherence with EU quality policy** and that they do not create excessive confusion for the consumers. Particular attention should be placed on the proposal for a harmonised mandatory nutrition labelling, since some already existing labels (i.e. nutriscore) give consumers an oversimplified information on the products that could be harmful not only for GIs but also for consumers. **A balanced diet approach should be privileged**.



## Organic farming

Concerning organic farming, the Commission set as **target** to achieve at least 25% of the EU's agricultural land under organic farming by 2030. In addition to CAP measures, the Commission will put forward an **Action Plan on organic farming** to stimulate both supply and demand for organic products, through **promotion campaigns** and **green public procurement**.

## Nutrient profiles

The Commission will also seek opportunities to facilitate the shift to healthier diets and **stimulate product reformulation (action 15)**, including by setting up **nutrient profiles to restrict the promotion** (via nutrition or health claims) of foods high in fat, sugars and salt (**action 16**). **Timeline:** Q4 2021

**Analysis:** These two actions could represent a serious threat for GIs if they are not considered as an exception to this process. Product reformulation and restrictions to promotion should be limited to industrial products and not penalise products resulting from traditional know-how and production techniques. In fact, GIs nutrient profiles and production techniques cannot be altered without changing the very nature of the product.

## Sustainable food procurement

In order to improve the availability and price of sustainable food and to promote healthy and sustainable diets in institutional catering, the Commission will **determine the best modalities for setting minimum mandatory criteria for sustainable food procurement (action 22)**. **Timeline:** Q3 2021

Moreover, the Commission will **review of the EU school scheme legal framework with a view to refocus the scheme on healthy and sustainable food** to enhance its contribution to sustainable food consumption and in particular to strengthen educational messages on the importance of healthy nutrition, sustainable food production and reducing food waste (**action 25**). **Timeline:** 2023

**Analysis:** The definition of minimum mandatory criteria will help cities, regions and public authorities to source sustainable food for public canteen and will boost, indirectly, sustainable farming systems. AREPO should monitor the process of definition of these criteria and assure that **GIs and local products** are taken into consideration.

## Combating food fraud along the food supply chain

The Commission intends to scale up its fight against food fraud to achieve a level playing field for operators and strengthen the powers of control and enforcement authorities. To do so, the EC will **enhance coordination to enforce single market rules and tackle Food Fraud, including by considering a reinforced use of OLAF's investigative capacities (action 19)** **Timeline:** 2021-2022

**Analysis:** This action will have a positive effect on GIs sector.

## USEFUL LINKS

**EU Green Deal:** download the full communication [here](#). More documents and explainers available [here](#).

**Farm to Fork:** download the full communication [here](#). More documents and explainers available [here](#).

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AREA OF ACTION	ACTIONS INCLUDED IN THE DRAFT ACTION PLAN	TIMELINE	OTHER EC ACTIONS/ INITIATIVES	TARGET FOR 2030
	<b>N.1.</b> Proposal for a <b>legislative framework for sustainable food systems</b>	2023		
	<b>ENSURE FOOD SECURITY</b>			
	<b>N.2</b> Develop a <b>contingency plan for ensuring food supply and food security</b>	Q4 2021	The plan will set up a <b>common European food crisis response mechanism</b> , coordinated by the EC and involving MS. Furthermore, the <b>agricultural crisis reserve will be revamped.</b>	
	<b>ENSURE SUSTAINABLE FOOD PRODUCTION</b>			
NEW CAP AND EU GREEN DEAL	<b>N.3</b> Adopt recommendations to each Member State addressing the nine specific objectives of the <b>Common Agricultural Policy (CAP)</b> , before the draft CAP Strategic Plans are formally submitted	Q4 2020		
CHEMICAL PESTICIDES	<b>N.4</b> Proposal for a revision of the Sustainable Use of Pesticides Directive to significantly <b>reduce use and risk and dependency on pesticides</b> and enhance Integrated Pest Management	Q1 2022		1. <b>Reducing by 50%</b> the use and risk of <b>chemical pesticides</b> ; 2. <b>Reducing by 50%</b> the use of more <b>hazardous pesticides.</b>
	<b>N.5</b> Revision of the relevant implementing Regulations under the Plant Protection Products framework to facilitate placing on the market of <b>plant protection products containing biological active substances</b>	Q4 2021		
	<b>N.6</b> Proposal for a revision of the <b>pesticides statistics Regulation</b> to overcome data gaps and reinforce evidence-based policy making	2023		
ANIMAL WELFARE	<b>N.7</b> Evaluation and revision of the existing <b>animal welfare</b> legislation, including on animal transport and slaughter of animals	Q4 2023	EC will also consider <b>options for animal welfare labelling.</b>	
GHG EMISSIONS	<b>N.8</b> Proposal for a revision of the <b>feed additives</b> Regulation to reduce the environmental impact of livestock farming	Q4 2021		
	<b>N.24</b> Review of the <b>EU promotion programme</b> for agricultural and food products with a view to enhancing its contribution to sustainable production and consumption	Q4 2020		
	<b>N. 9</b> Proposal for a revision of the Farm Accountancy Data Network Regulation to transform it into a <b>Farm Sustainability Data Network</b> with a view to contribute to a wide uptake of sustainable farming practices	Q2 2022		
COMPETITION RULES	<b>N.10</b> Clarification of the scope of <b>competition rules</b> in the TFEU with regard to sustainability in collective actions.	Q3 2022		
	<b>N.11</b> Legislative initiatives to enhance cooperation of primary producers to <b>support their position in the food chain</b> and non-legislative initiatives to <b>improve transparency</b>	2021-2022		

AREA OF ACTION	ACTIONS INCLUDED IN THE DRAFT ACTION PLAN	TIMELINE	OTHER EC ACTIONS/ INITIATIVES	TARGET FOR 2030
NEW GREEN BUSINESS MODELS	<b>N. 12</b> In the framework of EU carbon farming initiative the EC will develop a <b>regulatory framework</b> for certifying carbon removals	Q3 2021		
EXCESS OF NUTRIENTS			Targets will be achieved by implementing and <b>enforcing the relevant environmental and climate legislation</b> in full.	1. Reducing <b>nutrient losses</b> by <b>at least 50%</b> ; 2. Reducing <b>fertilizer use</b> by at least <b>20%</b> .
ANTIMICROBIAL RESISTANCE			The new <b>Regulations on veterinary medicinal products and medicated feed</b> provide for a wide range of measures to help achieve this target.	<b>Reducing overall EU sales of antimicrobials</b> for farmed animals and in aquaculture by <b>50%</b>
PLANT HEALTH			1. Adoption of rules to reinforce <b>vigilance</b> on plant imports and surveillance on Union territory. 2. Measures to <b>facilitate the registration of seed varieties</b> and to ensure easier market access for <b>traditional and locally</b> -adapted varieties. 3. <b>Study of the potential of new genomic techniques</b> to improve sustainability along the food supply chain.	
ORGANIC FARMING			<b>EC Action Plan on organic farming</b>	To achieve at least <b>25% of the EU's agricultural land under organic farming.</b>
	<b>STIMULATE SUSTAINABLE FOOD PROCESSING, WHOLESAL, RETAIL, HOSPITALITY AND FOOD SERVICES' PRACTICES</b>			
CORPORATE GOVERNANCE FRAMEWORK	<b>N.13</b> Initiative to improve the <b>corporate governance framework</b> , including a requirement for the food industry to integrate sustainability into corporate strategies	Q1 2021		
EU CODE OF CONDUCTS	<b>N.14</b> Develop an EU code and monitoring framework for <b>responsible business and marketing conduct</b> in the food supply chain	Q2 2021		
NUTRIENT PROFILES	<b>N.15</b> Launch initiatives to stimulate <b>reformulation</b> of processed food, including the setting of <b>maximum levels for certain nutrients</b>	Q4 2021		
	<b>N.16</b> Set <b>nutrient profiles</b> to restrict promotion of food high in salt, sugars and/or fat	Q4 2022		



AREA OF ACTION	ACTIONS INCLUDED IN THE DRAFT ACTION PLAN	TIMELINE	OTHER EC ACTIONS/ INITIATIVES	TARGET FOR 2030
FOOD PACKAGING	<b>N.17</b> Proposal for a revision of EU legislation on <b>Food Contact Materials</b> to improve food safety, ensure citizens' health and reduce the environmental footprint of the sector	Q4 2022	EC will work on a <b>legislative initiative on re-use</b> in food services to substitute single-use food packaging and cutlery by re-usable products.	
MARKETING STANDARDS	<b>N.18</b> Proposal for a revision of EU <b>marketing standards</b> for agricultural, fishery and aquaculture products to ensure the uptake and supply of sustainable products	2021-2022	The EC will <b>strengthen the legislative framework on GIs</b> and, where appropriate, include specific <b>sustainability criteria</b> .	
	<b>N.19</b> Enhance coordination to enforce single market rules and tackle <b>Food Fraud</b> , including by considering a reinforced use of OLAF's investigative capacities	2021-2022		
<b>PROMOTE SUSTAINABLE FOOD CONSUMPTION, FACILITATING THE SHIFT TOWARDS HEALTHY, SUSTAINABLE DIETS</b>				
INFORM AND EMPOWER CONSUMERS	<b>N.20</b> Proposal for a harmonised <b>mandatory front-of-pack nutrition labelling</b> to enable consumers to make health conscious food choices	Q4 2022	EC will also examine ways to harmonise voluntary green claims and to create a <b>sustainable labelling framework</b> covering nutritional, climate, environmental and social aspects of food products.	
	<b>N.21</b> Proposal to require <b>origin indication</b> for certain products	Q4 2022		
	<b>N.23</b> Proposal for a <b>sustainable food labelling framework</b> to empower consumers to make sustainable food choices	2024		
SUSTAINABLE FOOD PROCUREMENT	<b>N.22</b> Determine the best modalities for setting <b>minimum mandatory criteria for sustainable food procurement</b> to promote healthy and sustainable diets, including organic products, in schools and public institutions	Q3 2021		
	<b>N.25</b> Review of the <b>EU school scheme</b> legal framework with a view to refocus the scheme on healthy and sustainable food	2023		
TAX INCENTIVES			<b>EC proposal on VAT rates</b> (currently being discussed in the Council) could allow Member States to make more targeted use of rates, for instance to support organic fruit and vegetables.	
<b>REDUCE FOOD LOSS AND WASTE</b>				
	<b>N.26</b> Proposal for <b>EU-level targets for food waste reduction</b>	2023		
	<b>N.27</b> Proposal for a revision of EU rules on <b>date marking</b> ('use by' and 'best before' dates)	Q4 2022		