

Contribution to the 2020 roadmap consultation on the Farm to Fork strategy

Position paper on the EU “Farm to Fork” Strategy submitted to the European Commission on 16 March 2020 by the Institute for European Environmental Policy (IEEP), Ecologic Institute, the Stockholm Environment Institute (SEI) and the Institute for Sustainable Development and International Relations (IDDRI)

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Introduction: Food system in the EU – where we are and where we need to go

All relevant sustainable food system scenarios that have been published so far insist on three major changes if we are to achieve such an endeavour in the EU context. They should, therefore, be put at the heart of the Farm to Fork (F2F) strategy:

- Shift average diets towards less animal protein consumption, less sugar, fewer calories
- Reduce the impact of farming practices on the environment by (i) reducing the absolute level of synthetic inputs used; (ii) improving the overall input-output efficiency; (iii) re-diversifying vegetal & animal production; (iv) increasing the share of agroecological infrastructures in agricultural landscapes.
- Reduce the level of food waste and losses by at least 50%

Simultaneously, several analyses focusing on existing lock-ins/barriers to change have identified that to make progress on any of the three above mentioned objectives, a complete restructuration of food value chains, from upstream to downstream, is needed.

Food value chain organisation, indeed, determines by far and large what farmers can produce (depending on what they have access to in terms of inputs –upstream – and in terms of markets –downstream), what consumers will buy (in terms of availability on shelves and accessibility), and how much will be wasted and lost along the chain (depending on logistics, portion size, packaging...).

At the same time, the current structure of food chains is itself massively driven by the very structure of food and agricultural markets at the regional and global level – hence competition and trade policies play a major role.

“Europe’s environment is at a tipping point. We have a narrow window of opportunity in the next decade to scale up measures to protect nature, lessen the impacts of climate change and radically reduce our consumption of natural resources.”

Hans Bruyninckx, Executive Director, European Environment Agency (EEA)
Abstract of the EEA’s State of the Environment Report 2020 (SOER)

To reverse current trends and put European food systems on track towards greater sustainability, the Farm to fork strategy, therefore, needs to simultaneously to:

- Transform the governance of the EU food system / food-related policies (*section 1*)
- Take ambitious measures to ensure the needed changes on all five dimensions (diet shift, food waste and losses reduction, food value chain transformation, agricultural landscape transformation, trade & competition policies) are triggered and will happen at sufficient scale and pace (*section 2*)

1. Operationalising the Farm to Fork strategy: The enablers

1 Strengthening the coherence: Towards a change in governance

The Green Deal as presented and communicated back in December 2019 aims at *'transforming the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there are no net emissions of greenhouse gases in 2050 and where economic growth is decoupled from resource use. It also aims to protect, conserve and enhance the EU's natural capital, and protect the health and well-being of citizens from environment-related risks and impacts'*¹

For reaching such an overarching objective which underpins all EU existing policies; the strategies falling underneath, including the Farm to Fork Strategy, will have to be cross-cutting. Additionally, the policies with direct and indirect influence used to reach those strategies will have to work coherently to increase synergies and avoid trade-offs.

The first step towards a successful farm to fork strategy and eventually sustainable food and farming in Europe will be to ensure coherence between those policies that influence agricultural practices, e.g. the CAP, environmental, trade, food security, animal welfare, climate policies, the EU's international commitments (e.g. SDGs, Paris Agreement, etc.) as well as the new legislative initiatives that will emerge under the Green Deal. This requires a new ex-ante coherence mechanism with a wider scope than what exists currently². That coherence mechanism could notably and partially take the form of an independent high-

level food & agriculture sustainability/ Farm to fork advisory board composed of independent experts that would systematically assess the coherence of new EU law, revisions or initiatives that affects our food system, given the fragmented nature of the policies surrounding farming and food choices.

Additionally, not only the political structure of the European Commission should be adapted to the Green Deal but also its services. The current division of the DGs and their directorates and units should be revised to reflect the cross-cutting nature of the Green Deal and its initiatives; the way current policies are divided under the different DGs should also be reviewed to optimize synergies.

In the case of the Common Agricultural Policy (CAP) also section 2.5) and in particular because of the approval mechanism of the CAP strategic plans and the strategic importance of these plans to reach many objectives of the farm to fork strategy, it would be sound to **organise 'cross-cutting' approval boards comprising of representatives from ENVI, SANTE, AGRI, REGIO.**

Overall this change in governance and approach to policy making also requires a change in mindset which should not be underestimated, at all three levels: EU, national and local. Support from the European Commission in the form of **farm to fork Geo Hubs** (as they currently exist for Rural development for groups of countries) but made of representatives from several DGs (not just AGRI but also ENVI, SANTE, REGIO) could help guiding national authorities through those changes and offer tailored support.

¹ European Commission (2019): "Communication on a European Green Deal": https://ec.europa.eu/info/sites/info/files/european-green-deal-communication_en.pdf

² For the time being, the only process that allows for checking coherency to a certain extent is the interservices consultation/ yet it does not seem to be enough to prevent silo approaches

2 Giving a clear direction of travel: Target and monitoring

According to the Roadmap of the Farm to Fork Strategy, “[t]he overall objective of the strategy is to accelerate the transition towards a sustainable food system that should have a neutral or positive environmental impact, is capable to adapt to climate change and at the same time contributes to climate change mitigation, ensures food security and creates a food environment which makes healthy diets the easy choice for EU citizens.”

While these overall targets make clear that the Farm to Fork Strategy has multidimensional targets, it is important to also give a definition of sustainable and healthy food systems in Europe. A starting point can be the FAOs definition of sustainable food systems (“A sustainable food system is ‘a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised.”³). As the concept of ‘sustainable food systems’ has been defined in various ways and not all definitions address the full spectrum of sustainability dimensions this is a first important step to specify the scope of the F2F Strategy.

In a second step, the F2F Strategy should be more specific about the vision for the EU food system. A transition towards healthy and sustainable food systems would need:

- to work within the planetary boundaries and follow agroecology principles
- support healthy diets,
- ensure food security and food safety,
- support high animal welfare standards and

- (re-)build resilient regional food chains and improve food sovereignty.

An EU food policy would accordingly need to internalize costs that are so far externalized (e.g. environmental damages, health costs due to poor diets) and use public money of the CAP and other funds only for the provision of public goods.

A third aspect is to define specific, ambitious, quantitative and binding targets in the Farm to fork Strategy. Key targets and quantified indicators should reflect the necessary changes across the whole value chain, covering production, processing and consumption. In addition to the well-selected suggested indicators...

- reducing the use and risk of pesticides,
- reducing sales of antimicrobials,
- setting targets on mineral and organic fertilizers,
- increasing the area for organic farming and
- reverse the rise in overweight and obesity rates across the EU)

...the EU should add an indicator for **increased use of plant-based foods** (see the section below).

Forth, the farm to fork strategy needs to be accompanied with a **clear timeline for implementation and ambitious interim targets**. A clear vision and ambitious (interim) targets are a necessary precondition for the alignment of sectoral policies and a clear guideline for national implementation. They are also needed to provide investment security and predictability of political strategies for the private sector - especially as the planning horizon for investment in the agri-food sector (stables, processing facilities etc.) is particularly long.

³ FAO (2018): “Sustainable food systems. Concept and framework”; <http://www.fao.org/3/ca2079en/CA2079EN.pdf>

3 From an EU initiative towards a participatory building process

To ensure “better regulation”, the Roadmap of the Farm to Fork Strategy foresees “consultations with a wide range of stakeholders and citizens”, that “will take place after the publication of the Strategy in the context of the elaboration of individual initiatives proposed. This will include, amongst others, discussions with the EU Platform on Food Losses and Food Waste, the EU Animal Welfare Platform and via Citizen’s Dialogues in Member States.”

While this approach includes important elements, it needs additional measures, as a meaningful setup and implementation from EU to the regional level of the Farm to Fork Strategy needs a considerable rethinking of how our food systems work and hence needs additional measures to ensure appropriate consultation and co-creation.

Currently and over the past decades, an approach dominated, that developed policies (agriculture, health, food security, environment, trade etc.) in isolation without much dialogue between the policymakers working on them at different levels and with no coherent approach guiding institutions towards healthy and sustainable food systems.

Consequently, it is important to **build up processes and institutional structured that facilitate collaboration** between different policy area administrations, coordination among different government levels and stakeholders and that allow the implementation of locally adapted and socially just transition strategies. The action plan of the Farm to Fork Strategy should, therefore, require **Member States to set up national food strategies to build sustainable and healthy food systems**. It is only on this level, that locally adapted solutions can be identified. Consultation on the national (and regional) level would also allow a meaningful

consultation of stakeholders, that could not take place during the three months of the development of the Farm to Fork Strategy - including consultation and co-design with citizens (using citizens dialogues and citizens assemblies). The national food strategy plans can also be used, to **ensure that the CAP Strategic plans are aligned** with the national plans for sustainable and healthy food systems.

In addition, an **exchange forum on EU level** (comparable to the well-functioning “EU Platform on Food Losses and Food Waste”⁴ that meets biannually and is organized by DG SANTE) should be set up that allows an exchange between Member States, all relevant DG’s within the EU Commission, the private sector, independent researchers, civil society organisation and representatives of local governments about target setting, strategies for the reconciliation of interest, implementation strategies, monitoring etc.

Given the complexity of the challenge to transform food systems on all levels and the need to collaborate with all relevant stakeholders the setup of, for example, an advisory group of food experts would not be sufficient to define and implement action for sustainable and healthy food systems.

4 Driving the transition through research and innovation

It is welcomed that the Roadmap of the Farm to Fork Strategy acknowledges the **role of research, innovation and financial investments** to provide solutions for sustainable food systems and identify market opportunities. These can help to further develop solutions for healthy and sustainable food systems, including solutions to mitigate GHG emissions, land restoration, biodiversity protection, the production and use of alternative proteins, requirements for a diet change and the use of nudging and social norms, the development of City-Region Food Systems, reduction of over-packaging and the uptake of

⁴ DG SANTE (2016): “EU Platform on Food Losses and Food Waste”:

https://ec.europa.eu/food/safety/food_waste/eu_actions/eu-platform_en

agroecology and nature-based solutions – to name a few.

For the implementation and further specification of the Farm to Fork Strategy, it will be important to ensure that **bottom-up participatory research, advisory services, and farmers' knowledge exchange groups** that are focused on agroecological solutions feature more explicitly in the Farm to Fork Action Plan. Approaches that are only top-down and focus too narrowly on technological solutions need to be avoided.

Research and experience show that participatory, bottom-up processes where

farmers are actively involved in research (by co-defining the questions to be asked, testing solutions and then acting as demonstrators in their environments and among their peers) in their specific biophysical and economic conditions result in directly relevant research and effective changes in farming practices.

The EU recognises this also in its EIP Agriculture Innovation Partnership and should also do so in its upcoming **research programme “Horizon Europe”**.

2. Strengthening the strategy: Some policy recommendations

1 Sustainable and healthy diets

The Farm to Fork Strategy aims to “create a food environment which makes healthy diets the easy choice for EU citizens”, to “promote sustainable food consumption, facilitating the shift towards healthy, sustainable diets” and to “reduce food loss and waste”. (...) “To promote sustainable food consumption, the Commission will, amongst others, propose actions to help consumers choose healthy and sustainable diets by providing better food information such as on where the food comes from and its nutritional value.”

However, evidence consistently shows that **intervention strategies that only provide information are likely to belong to the least successful**⁵. The common assumption that providing the information is sufficient to induce behavioural change is therefore not supported by the evidence. The provision of more information often reduces consumers’ ability to make satisfying choices due to the limited capacity and/or willingness to understand and interpret the available information⁶. Evidence though shows that food choices are heavily influenced by the **food environment**, i.e. the **availability and accessibility of various food options, price signals, marketing and advertising,**

tradition and cultural habits, convenience, etc.

The Farm to Fork strategy and its action plan must, therefore, foster systemic change and increase the availability, affordability and attractiveness of healthy and sustainable food, refrain to put all responsibility on the consumer and **make the healthy and sustainable choice the easy choice**. To achieve sustainable and healthy diets **policymakers should use all tools available**, including **regulation** (e.g. reducing exposure of children to advertisements of unhealthy food), **economic instruments, food education** and **nudging** tools⁷. In its 2017 “best buys” publication the WHO gives an overview of food policies that are proven to be efficient

To facilitate the change towards healthy and sustainable diets, the EU Commission should also **spearhead the development of guidelines for healthy and sustainable food**.

So far, the integration of health and sustainability requirements in dietary guidelines is largely absent, although **healthier diets almost always benefit the climate and the environment**.

Currently, food consumption in the EU is not in line with healthy eating guidelines nor with requirements to save environmental resources: Many Europeans eat too much, too energy-

⁵ Osbaldiston and Schott (2012), Wunder (2019), SAPEA working group report (2020)

⁶ Umpfenbach 2014

⁷ Nudging is a concept in behavioural science and political theory which proposes to influence behaviour without coercion (Sunstein and Thaler 2008). It uses automatic cognitive processes (“mental shortcuts”) in favour of the desired outcome, i.e. they are “gently pushing” consumers in the favoured direction without forcing them (in the area of food e.g. by only offering smaller plates

in public canteens which help to reduce food waste, by offering pre-sliced fruits supporting the consumption of fresh fruits, by changing the salience of information of food packaging to allow better choices etc.). Altering the choice architecture through nudging is a response to the so called “intention-behaviour gap”, as they work without influence on intentions but rather with “automatic” changes in behaviour.

dense foods which are high in fat, sugars and salt. They also eat too much red and processed meat, whereas intakes of fruit and vegetables, nuts and whole grains remain insufficient. At the same time, meat, dairy and eggs are the main products driving the overall environmental impacts of food consumption in the EU⁸.

EU-wide guidelines for sustainable and healthy diets would inform Member States' efforts to integrate sustainability elements in national dietary advice and bring clarity to consumers on what is a healthy and sustainable diet.

These guidelines should also clearly point out that there is large scientific evidence⁹, that the reduction of animal products and the **increase of plant-based food consumption** must be a core element of healthy and sustainable dietary guidelines and can also a **suitable key performance indicator for the Farm to Fork Strategy**.

A general dietary shift towards more plant-based food sources is not only needed for health but also animal welfare reasons. Plant-based products also compare favourably when it comes to greenhouse gas emissions. If the livestock sector though was to continue with business as usual, this sector alone would account for 49% of the emissions budget for 1.5°C by 2030 worldwide, requiring other sectors to reduce emissions beyond a realistic or planned level and increases the risk of exceeding emissions budgets consistent with limiting warming to 1.5°C and 2°C¹⁰.

The WHO (2017) recommends the *"implementation of subsidies to increase the intake of fruits and vegetables and implementation of a mass media campaign on healthy diets, including social marketing to reduce the intake of total fat, saturated fats, sugars and salt, and promote the intake of fruits and vegetables"* as an intervention that has proven to be effective.

Lastly, the Farm to Fork Strategy should also acknowledge the role of **reducing food losses and food waste** and provide the framework to facilitate the implementation of the recommendations for action of the EU Platform on Food Losses and Food Waste.

2 Building regional supply chains

A key component in building sustainable food systems is to support so-called **"City Region Food Systems"**, an approach co-developed and tested by the FAO. City Region Food Systems aims to foster the development of resilient and sustainable food systems within urban centres, peri-urban and rural areas surrounding cities by strengthening rural-urban linkages.

The elaboration of city region food strategies is promising because they involve the core issues of sustainable food systems, such as closing nutrient cycles, regional development, value creation and reconnecting consumers and producers. They also support the resilience of food systems, an aspect that has gained even more importance in the context of the Coronavirus disease (COVID-19) outbreak.

Growing interest to (re-)develop regional food policies can also be seen in the growing number of cities that have signed the "Milan Urban Food Policy Pact". The acknowledgement of city region food systems is **still lacking from the Farm to Fork Strategy Roadmap** – but should become an important element.

To support city region food systems the strategy can help to support alternative business models, such as short and direct supply chains and consumer cooperatives, support and involve local and regional governments committed to transitioning towards sustainable food systems as well as food policy councils at regional level.

⁸ EEA (2019) and JRC (2019)

⁹ E.g. Willet et al. 2019 in the EAT Lancet Report

¹⁰ Harwatt 2019

3 Reconnecting production and consumption by targeting actors/practices along the whole of the supply chain

In the current situation, food value chain organisations determine by large and far what farmers can produce (depending on what they have access to in terms of inputs – upstream – and in terms of markets price and opportunity –downstream), what consumers can buy (in terms of availability on shelves and accessibility), and how much is wasted and lost along food chains (depending on logistics, portion size, packaging...). A major area of intervention of the Farm to Fork Strategy should thus be to trigger food value chain transformation in four complementary ways:

- o Following up on the UTP directive, the Farm to Fork Strategy should support more transparency and a better value-added distribution along food value chains;
- o Upstream: encourage the re-diversification of seeds/variety portfolio of major seed industry players, in particular regarding protein-rich plants, to (i) develop varieties that are better adapted to local conditions and hence less dependent upon external/synthetic inputs; (ii) increase the overall variety of plants produced, processed and consumed in the EU, which will, at the plot/farm level, enable to lengthen and complexify crop rotations and hence limit the recourse to synthetic inputs; and the consumer level, diversify the sources of macro and micronutrients;
- o Midstream (collecting / processing):
 - accompany the investment in facilities for increasing or developing storing and processing capacities for new/diversified crops;
 - support the re-localization and de-standardization of sourcing strategies

of major processors to (i) increase the market uptake of local breeds, (ii) decrease the transportation costs associated to global sourcing strategies (that today dominate)

- support the development of new and diversified vegetal-based product lines

4 Strengthening transparency of commodity trade to minimise the environmental and climate footprint of EU agriculture and food consumption

The EU is the second-largest importer of agriculture goods in the world. Much of the EU's agriculture sector is dependent on imported commodities such as soy or palm oil. Achieving the targets of the EU Green Deal and reducing the climate and environmental impact of EU agriculture thus crucially depends on **reducing the impact of imported commodities**. This is particularly important given that **trade in soy and palm oil has been linked to deforestation** in the tropics including the Amazon (Green et al 2019).

Increased and improved transparency is needed to monitor the environmental and climate impacts of agricultural goods imported into the EU, and to **minimise leakage and spill-over effects** from land use, land use change and forestry (LULUCF) caused by EU agriculture trade and food consumption (Meyfroidt et al 2020). Science-based transparency tools – like [Trase](#) – now exist that can aid policy makers in developing policies and designing interventions to reduce the adverse impacts of agriculture trade.

5 Promoting the circular use of nutrients to protect biodiversity and increase resource efficiency

A key task for policymakers is to combine the Farm-to-Fork Strategy with the circular economy action plan and the Integrated Nutrient Management included in the Biodiversity Strategy.

The phosphate life cycle is currently predominantly linear, from phosphate mining to fertilizer production, agriculture, food consumption and wastewater treatment. Excess phosphorus ends up in the soil and agricultural run-off causing eutrophication and other environmental impacts. This calls for **actions to promote the reduction, capture and recycling of phosphorus and other nutrients**.

The new European Union Fertilizing Products Regulation presents structural opportunities that are likely to level the playing field between conventional and waste-derived fertilizers and thereby improve the market opportunities for recovered phosphorus.

However, the system currently appears to be moving towards a **narrow focus on a few new technologies for recovering and reusing phosphorus, which could lead to new lock-ins** (Barquet et al 2020).

Solutions need to address the acceptability of the technologies and waste-derived products to users, while the vision of a circular economy needs to be better articulated through **regulatory interventions to capture the environmental externalities of phosphate mining**.

Furthermore, **actions need to be taken to promote recycling other nutrients and organic matter in wastewater, and “upstream” work** to reduce the contaminants entering wastewater streams at the source as a way to minimize the public health and ecosystem risks associated with reuse and wastewater management more broadly. There exist several promising eco-technologies for

recovery of nitrogen and phosphorus (Macura et al 2019).

6 Making wetlands restoration and stewardship an integral part of the Farm to Fork strategy

Wetlands restoration and stewardship should be an integral part of the European Green Deal and the Farm to Fork Strategy because it can **simultaneously address biodiversity protection, climate mitigation and sustainable food production**.

Participatory approaches – like those being developed under the Water Framework Directive – are essential to **building public understanding and buy-in** necessary to support strong ecosystem stewardship.

Wetlands provide water-based ecosystem services that include buffering and storing of heavy precipitation that benefits agriculture. They also provide vital habitat for biodiversity. As such, **wetlands support rural livelihoods including farming**, cultural and recreational activities, and tourism (Land and Carson 2019).

Importantly, intact wetlands also store a stunning amount of global carbon – 20% of the world's terrestrial carbon (Scharlemann et al. 2014). **Drained wetlands (peatlands), however, are a major source of carbon emissions** (Barthelmes et al 2015). Wetlands make up some 2% of EU land area, 4.3% of Natura 2000 areas, and remain among Europe's most threatened ecosystems with losses largely driven by earlier agricultural policies and practices (Wetlands International 2020).

7 Making the CAP a key tool of the Farm to Fork strategy

The reform of the Common Agricultural Policy (CAP) appears to be an essential part of the implementation of the Green Deal, and in

particular the Farm to Fork, due to its importance both financially (largest EU budget) and from a sectoral perspective (it has structured the various changes in the European food system since its launch in 1962).

The proposed shift from a compliance approach to performance and results seems to be the right one but it should be built on experience with the last reform and the high risk of Member States favouring a race to the bottom when it comes to environmental ambition.

To reflect the Green Deal and the Farm to Fork strategy, the overarching ambition of the CAP should be to transform the food and farming sector towards a sustainable one. But this is too broad and vague as an objective and therefore quantified and ambitious targets are needed to set the way.

It remains unclear though how these EU and overarching Farm to fork targets can be effectively translated into the national CAP strategic plans in particular given 1. The timing 2. The EU nature of the targets vs the national and top-down approach of the Farm to Fork strategy.

On the timing first, even if the CAP proposals for post-2020 have not been approved and are likely to be implemented as of 2023, not before, Member states and regions are already getting ready for the first steps of the planning including the SWOT and needs assessment. The Farm to Fork strategy – and in particular its action plan and targets – must be taken on board as early as possible in that process. The Commission is expected to play a crucial role in this.

On the top-down (Green Deal, farm to fork) and bottom-up (CAP strategic plans)

approaches: the EU targets set under the Farm to fork need to be translated into targets that can be integrated into the CAP strategic plans. The Efforts sharing Regulation approach could be a source of inspiration: the EU sets the overall EU objective and then the efforts are shared among the Member States (for ex: GHG reduction, nature reserve farming areas, organic..). These targets should then become part of the Commission's essential approval elements of the CAP strategic plans. An additional incentive for Member States to reach those targets could be given through a financial mechanism. A sort of performance bonus as already proposed in the legislative proposals but tight to the Farm to fork strategy targets and their level of achievement. To ease that process and its monitoring, Member States could be given intermediate targets.

Additionally, it is important to strengthen the coherence between the strategy and the strategic plans and in particular to avoid that targets end up been taken separately as objectives in themselves forgetting about the need to tackle the whole of the food system¹¹. This can be done by asking Member states to develop farm to fork strategies at the national level and would help the Commission assess the coherence between the strategy objectives and the strategic plans (see governance section above).

Looking at the proposed elements under the future CAP, several of them appear to be crucial for the success of the farm to fork strategy and Green Deal:

- o **The 'no backsliding' clause** (Article 92 of COM(2018) 392 final) and its operationalisation will be essential. Sound and robust criteria, quantitative (financial) but not only, should be put in place to be used by Member States and the European

¹¹ ['Ecophyto plan'](#) in France (its pesticides reduction target) is a timely reminder that a strategy exclusively focused on the agricultural/farmer component, without consideration for the restructuring of the sectors upstream and downstream of producers, cannot remove the socio-technical barriers at work today.

Unfortunately, reducing the use of synthetic inputs cannot be solely decreed: it is built by making it possible to re-diversify crops at the farm level, by developing upstream (quality seeds, agricultural advice) and downstream (collection, storage, processing and recovery) sectors.

Commission to determine that increased ambition is proposed.

regulations in Member States outside of the CAP will remain essential to support the shift to more sustainable farming systems.

- o **The new eco-scheme** could also play a crucial role in the achievement of the farm to fork objectives. It is indeed well suited to address multiple EU environmental and climate objectives and promote the necessary shift towards greater agricultural sustainability. Moreover, it could be part of a strategic policy architecture to promote a culture of continuous development in Member States and amongst farmers.

Member States have the option to dedicate a sizeable proportion of their Pillar 1 allocation to the eco-scheme, which would be 100% financed by the EU budget and would not incur any national or regional co-financing, unlike environment and climate measures available under Pillar 2 but the fact that the legislative proposal do not ring-fence a part of Pillar 1 budget (at least 30% as it currently the case for greening) is a strong weakness that should be fixed. Member States also should be able to use multi-tier hierarchy to incentivise and reward farmers and land managers to take action and undertake a combination of basic and more demanding commitments. Collective approaches should also be permitted so that the eco-scheme(s) could be designed in a way that allowed for implementation by groups of farmers.

- o On the climate delivery of the CAP, and in particular the **proposed climate tracking** approach: It seems that such an approach is too weak (broad brush and ex-ante) and leading to an overestimation of what the CAP actually delivers in terms of GHG emissions reduction and removal. For the 40% marker to be better justified, not only significant improvements would have to be made in the proposed enhanced conditionality but also a different methodology would be required to assess how expenditure is spent on the ground ex-post.
- o Finally, it is important to highlight that improved enforcement of environmental

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