

The Consumer Voice in Europe

TOWARDS GREENER AND HEALTHIER FOOD FOR EUROPEAN CONSUMERS

BEUC's take on the 'Farm to Fork' Strategy for a fair, healthy,
and environmentally friendly food system



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EC register for interest representatives: identification number 9505781573-45



Co-funded by the European Union

Ref: BEUC-X-2020-057 - 29/06/2020

Why it matters to consumers

Two-third of Europeans are open to changing their food habits for environmental reasons. This is the encouraging trend that emerged from a survey¹ of consumers on attitudes towards sustainable food published by BEUC in June 2020.

However, the survey, spanning 11 countries², also found that consumers face hurdles in eating more sustainably. The EU 'Farm to Fork' Strategy³ **has great potential for tackling these barriers and making the healthy and sustainable food choice easier for consumers.**

Yet, the shift to a more sustainable food system **cannot rely solely on individual choices by consumers.** BEUC survey shows that **consumers expect EU and national policymakers to take leadership in promoting sustainable food consumption and production.**

Introduction

On 20 May 2020, the European Commission published the 'Farm to Fork' Strategy³ for shifting EU food production and consumption onto a more sustainable path. A major component of the overarching Green Deal, published in December 2019, the Strategy comes together with an Action Plan listing 27 measures which pave the way for greener food production, healthier and more sustainable diets, and less food waste.

BEUC, The European Consumer Organisation, welcomes the European Commission's plans to make food healthier and greener. While we would have hoped for some follow-up actions to happen sooner, at least the Strategy sets the EU on the right track to a more sustainable food and farming system. Our overall assessment of the Strategy is presented hereunder.

1. At the farm level

- The Strategy rightly recognises that, "even though the EU's transition to sustainable food systems has started in many areas", **more must be done** if the EU is to meet its climate and environmental protection goals.
- COVID-19 has sparked debate over the timing of publication of the Strategy and whether food security and food sustainability can go hand in hand. As the EU emerges from the pandemic, **there has never been a better time for laying out a clear vision for the future of food and farming.** A more sustainable EU food system where greenhouse gas emissions from agriculture (of which nearly 70% come from the animal sector) are lowered, pesticide use is cut to preserve biodiversity and where antibiotics are needed less thanks to improved animal husbandry is a **prerequisite for securing**

¹ BEUC, [One bite at a time: consumers and the transition to sustainable food](#), An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

² Austria, Belgium, Germany, Greece, Italy, Lithuania, Netherlands, Portugal, Slovakia, Slovenia, and Spain.

³ European Commission, ['Farm to Fork' Strategy for a fair, healthy and environmentally friendly food system](#), 20 May 2020.

supply of safe and healthy food in the long term. Food security and food sustainability are not conflicting or competing objectives. Rather, they are interrelated and interdependent. In any event, food security is generally not a major challenge in the EU: other issues such as food waste, overconsumption and obesity, as well as the environmental footprint of European households' food consumption⁴ are more significant challenges facing the EU food system today.

- To ensure that farmers are incentivised and supported in the transition towards more sustainable agricultural production, **the 'Farm to Fork' Strategy's objectives must be reflected in the post-2020 EU Common Agricultural Policy**. BEUC survey found that over one third of consumers (38.9%) would support regulations obliging farmers and food producers to meet more stringent sustainability standards. But even more (53%) agree that farmers should be given incentives (e.g. through subsidies) to produce food more sustainably.
- Because "what gets measured gets done", BEUC **welcomes the quantitative targets** set in the Strategy for reducing the use of pesticides and antimicrobials in farming as well as increasing the percentage of organically farmed land in the EU. Importantly, these targets must become binding. While it makes sense for these targets to be 'translated' into national objectives considering the starting point from various EU countries, it will be vital for the Commission to ensure that all Member States show similar levels of ambition on reaching these targets. Concretely, the Common Agricultural Policy strategic plans drawn up by the Member States should only be accepted by the Commission if they are likely to achieve the Strategy's objectives.
- Antimicrobial resistance is a major public health threat that kills an estimated 33,000 Europeans each year. Just like it does in humans, the inappropriate use of antibiotics in food-producing animals contributes to this phenomenon⁵. **Sadly, EU governments' action to curb sales of veterinary antimicrobials has been uneven**⁶. Yet, when countries have implemented stringent policies on antimicrobial use, resistance has decreased in animals. To meet the 50% sales reduction target for veterinary antimicrobials, the European Commission will have to be vigilant on the **strict implementation and enforcement** by Member States of the new EU rules on the prudent use of antimicrobials in animals to apply as of 2022.⁷
- The Strategy notes the potential role that "innovative techniques, including biotechnology" may play in increasing the sustainability of food production. As clarified by the EU Court of Justice, **organisms obtained from new genomic techniques fall within the scope of the EU GMO legislation**. As such, it is vital they continue to be required to undergo a thorough risk assessment and approval procedure before they can be marketed for food and/or feed use. Moreover, traceability and labelling of products produced using these techniques must guarantee consumers' right to know and freedom of choice. A lack of labelling of these products, on the other hand, would risk eroding consumer confidence in organic food – hence, running counter to the Strategy's objective to stimulate organic food production and consumption in the EU.

⁴ European Commission Joint Research Centre, *Indicators and assessment of the environmental impact of EU consumption*, 2019.

⁵ BEUC. [Antibiotic use in livestock](#), factsheet, August 2014.

⁶ European Medicines Agency, [European countries increase commitment to responsible antibiotic use in animals](#), Press release, October 2019.

⁷ [Regulation](#) (EU) 2019/6 on veterinary medicinal products.

2. Between the farm and the fork

- The Strategy rightly recognises the major role played by food processors, retailers, caterers, etc. in **shaping and influencing consumer food purchase decisions**. A wider choice of healthy and sustainable food options, as well as more responsible marketing and advertising practices are needed if people are to change what and how much they eat.
- Over-reliance on self-regulation and voluntary commitments by industry has failed to deliver meaningful results so far in areas such as reformulation (i.e. changing recipes to improve the nutritional composition of food products) and food marketing and advertising to children. It is disappointing that the Commission is proposing to continue going down that route via the development of an “EU Code of conduct for responsible business and marketing practice” – albeit threatening legislation if progress is insufficient. BEUC is convinced that stronger government leadership and **binding rules are needed to restrict the marketing and advertising of unhealthy food to children**.⁸
- On the other hand, we welcome that the Commission will consider setting **maximum levels for certain nutrients in processed foods** to stimulate reformulation. Equally welcomed is the Commission’s commitment to **finally setting ‘nutrient profiles’**⁹ to restrict the use of nutrition and health claims on unhealthy food. Nevertheless, with nutrient profiles more than ten years overdue,¹⁰ it is regrettable that no proposal will see the light of the day until the end of 2022.
- The announced revision of the EU legislation on food contact materials is a **much-needed opportunity to fix the EU food packaging regime**, which is not fit for purpose and suffers from widely acknowledged deficiencies. For example, with the exemption of plastics, most food packaging materials are not subject to harmonized EU rules, leaving consumers potentially exposed to harmful chemicals migrating from packaging into their food. BEUC has made proposals for a reform of EU food packaging rules that better protect consumers.¹¹
- Consumers expect their food to be safe and what the packaging says it is. **BEUC welcomes the Commission’s announcement it will “scale up its fight against food fraud”**. However, the COVID-19 crisis, which is set to put a major strain on national governments’ budgets, is likely to exacerbate current trends of cutting back on funding of food official controls.¹² More than ever, the Commission will have to assure itself that all Member States allocate sufficient resources to food controls.

3. At the fork level

- The Strategy rightly recognises that **European diets are not line with recommendations for healthy eating**, and that a shift in consumption patterns will

⁸ [Letter to Food attachés on marketing to children and childhood obesity](#). BEUC-X-2017-061. May 2017.

⁹ Nutrient profiles are thresholds which determine whether a food or drink is healthy enough to deserve a claim. They aim to prevent that the use of a claim on a food or drink high in fat, sugars, or salt masks its true nutritional value. See BEUC [factsheet](#) for more information.

¹⁰ January 19th, 2019 marked 10 years of delay in the establishment of ‘nutrient profiles’, as required by law. See BEUC [press release](#) issued on this occasion.

¹¹ [Reform EU food packaging rules to better protect consumers. BEUC comments to the Food Contact Materials REFIT evaluation](#). BEUC-X-2019-029. May 2019.

¹² See [BEUC report](#) ‘Keeping food in check’ (October 2019).

be needed towards more plant-based foods and less red and processed meat, sugars, salt, and fats – which will also benefit the environment. **EU-wide guidelines for sustainable and healthy diets would bring clarity to consumers** on what is (or not) healthy and sustainable and inform Member States' efforts to integrate sustainability elements in national dietary advice. As such, we regret that the proposal to develop such guidelines was not retained in the 'Farm to Fork' Strategy.¹³

- To accompany and facilitate the shift in eating habits, we see the need for **better aligning the EU promotion programme for agricultural products with recommendations for healthy and sustainable diets**. In relation to meat, the Strategy notes that the EU promotion policy, which is currently under review, should "support the most sustainable, carbon-efficient methods of livestock production". BEUC agrees with the need to promote 'better' meat, but given that current EU meat consumption levels exceed the quantities recommended for good human and planetary health, we also think **it must go hand in hand with promoting 'less' meat (consumption and production)**.
- Overweight and obesity have been shown to affect how ill people get from COVID-19 if they are contaminated and are risk factors for many more diseases – from diabetes to stroke through several types of cancers – while putting great strain on healthcare systems. The Strategy's stated goal to **"reverse the rise in overweight and obesity rates across the EU by 2030" is therefore welcome but lacks ambition**.
- Front-of-pack nutrition labelling is a key policy tool to help consumers make more informed and healthier food choices. BEUC applauds the Commission for committing to coming forward with a proposal for **mandatory, EU-wide front-of-pack nutrition labelling** (albeit not before the end of 2022). Evidence from research conducted in several countries shows that 'Nutri-Score' is currently the best-performing scheme in both aiding consumers to compare the nutritional quality of foods across a range of products and to make healthier purchasing choices.¹⁴
- We also welcome the Commission's intention to require origin indication on more foods. The latest EU-wide poll on food safety found that origin tops consumer concerns when buying food.¹⁵ **BEUC supports an extension of the EU origin labelling requirements**, starting with meat served in the catering sector, meat used as an ingredient in processed food, milk and milk used in dairy products. Consumers are also increasingly looking for information on how farmed animals are raised and are expecting higher animal welfare standards.
- Our survey found that **most consumers (57%) want sustainability information to be compulsory on food labels**. The Strategy's proposed sustainable food labelling framework can make it easier for consumers to identify sustainable food options provided it is developed based on **solid, independent, and transparent scientific evidence – including on consumer understanding and use** of such labelling system. Attention should be paid to making such a system accessible and affordable to all producers, big and small (e.g. costly certification schemes and complex sustainability indicators may deter smaller producers from using the labelling system). We also support clamping down on greenwashing and misleading sustainability claims made on food (for instance via a pre-authorisation process modelled on the one existing for nutrition and health claims).

¹³It appeared in earlier, leaked drafts of the Strategy.

¹⁴[Front-of-pack nutritional labelling. BEUC position](#). BEUC-X-2019-033. May 2020.

¹⁵Special Eurobarometer Wave EB91.3. When considering important factors when buying food, respondents were more likely to answer: where the food comes from (53%), cost (51%), food safety (50%) and taste (49%).

- **Yet, the shift to a more sustainable food system cannot rely solely on individual choices by consumers.** This is what emerges from BEUC survey as well as from an extensive review of scientific evidence published earlier this year.¹⁶ Consumer choices are shaped by the food environment, including marketing and advertising, promotional offers, food availability and price, the spatial layout in supermarkets, etc. We welcome the recognition in the Strategy that “a favourable food environment that makes it easier to choose healthy and sustainable diets will benefit consumers’ health and quality of life”.
- Price, notably, ranked first among the barriers to eating more sustainably in nearly all countries covered by BEUC sustainable food survey. As such, **BEUC fully supports the ‘Farm to Fork’ Strategy’s objective to ensure that “the most sustainable food also becomes the most affordable”.** Food prices must be fair to protect people and the planet, and they must send the right signal to consumers to foster behaviour change. At the same time, it is vital to ensure that all consumers can afford a healthy and sustainable diet. This may become even more of a challenge in the aftermath of COVID-19. The Common Agricultural Policy, which takes a big chunk of the EU annual budget, must fully support the Strategy’s objectives, and contribute to making healthy and sustainable food affordable to all.

4. Towards a Common Food Policy for the EU

- The ‘Farm to Fork’ Strategy commits the European Commission to presenting “a legislative proposal for a framework for a sustainable food system” by the end of 2023 to promote policy coherence and mainstream sustainability in all food-related policies. Last year, BEUC and other organisations jointly called¹⁷ for the ‘Farm to Fork’ Strategy to pave the way for **an integrated Common EU Food Policy** bringing all policies affecting food (agriculture, trade, health, fisheries, etc.) into coherence and in line with the EU’s sustainability objectives. We see potential for meeting these expectations in the development of the legislative framework for a sustainable food system, including regarding the need for a democratic and participatory governance model to achieve the goals of the ‘Farm to Fork’ Strategy.
- **Trade, notably, is a key policy area that needs to be brought into coherence with the ‘Farm to Fork’ Strategy objectives.** It makes little sense for the EU to strive for sustainable food production if at the same time we continue importing products that do not meet our standards for environmental protection, animal welfare, etc. EU trade policy needs to be an enabler, not create obstacles to the EU’s journey towards food sustainability. As such, it must go beyond cooperation and dialogue to effectively **ensure that food that is imported into the EU complies with our regulations and standards.** A good example is the revised EU law on veterinary medicinal products, which will oblige third country producers exporting animal products to the EU to comply with stricter rules on antimicrobial use.¹⁸ The on-going review of the EU trade policy¹⁹ offers a welcome opportunity for it to be better aligned with the EU’s climate and sustainability goals.

¹⁶Science Advice for Policy by European Academies (SAPEA), [A sustainable food system for the European Union](#), Evidence Review Report No. 7, April 2020.

¹⁷[CSOs open letter on the Farm to Fork strategy to achieve sustainable food systems](#). 12th December 2019.

¹⁸Under [Regulation \(EU\) 2019/6](#) (to apply as of 2022), third country producers exporting animal products to the EU will have to respect the ban on antimicrobial use for growth promotion as well as any new EU restrictions on the use in farmed animals of those antimicrobials which are vital in human medicine. The European Commission, however, is yet to adopt the delegated acts allowing for the application of these new rules.

¹⁹The European Commission has just [launched a public consultation](#) on the future of the EU trade policy. See BEUC [position paper](#) on 5 keys to make the EU Trade Strategy work for consumers.

- Finally, it will be important that the 'Farm to Fork' Strategy is **implemented in close connection with other relevant Green Deal initiatives** such as the Biodiversity Strategy, the Circular Economy Action Plan, the Chemicals Strategy or the Zero Pollution Action Plan.

Conclusion

The 'Farm to Fork' Strategy for a fair, healthy, and environmentally friendly food system is a **promising step towards greener and healthier food for European consumers**. Nevertheless, a long road lies ahead before the measures announced as part of the Strategy's Action Plan can materialise into concrete proposals – with a risk that they could be watered down along the way.

[BEUC survey on sustainable food](#) found that consumers expect their governments to take leadership in promoting sustainable food production and consumption. They also want the EU to stick to its current level of ambition on food sustainability, regardless of whether other countries around the world are doing the same or not. As such, **we urge EU and national policymakers to keep the level of ambition high** when designing and implementing the different initiatives that make up the Strategy.

BEUC and our members are looking forward to contributing to the upcoming discussions. **Consumer organisations can play a key role**, not only in bringing the consumer perspective to the policy debate, but also in mobilising consumers for the transition to a sustainable food system.

ENDS





This publication is part of an activity which has received funding under an operating grant from the European Union's Consumer Programme (2014-2020).

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