



2021

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# Position Paper

uniting dairy excellence & ambition

## EDA Position Statement

### On the EU Commission Roadmap (Inception Impact Assessment/ 'IAA') consultation on Sustainable Food Systems ('SFS')

The Green Deal and Farm to Fork strategies are intending to strive towards more Sustainable Food systems, in Europe and beyond. In the context of the preparation of a future legal framework on sustainable food systems, the European Dairy industry wishes to bring in some reflections and ideas for the upcoming assessment and work.

#### Main principles

- Some of the main principles of evaluation need to be the recognition of **food (and drink) as primary basic needs**, and the **priority of food and nutrition security** for EU citizens, and beyond. This has also been declared in the Paris agreement (the Climate agreement of Paris states that the parties are "Recognizing the fundamental priority of safeguarding food security and ending hunger, and the particular vulnerabilities of food production systems to the adverse impacts of climate change"). This food and nutrition security is valid short- and long-term, and across all situations (making a link to resilience of our food systems, where recent times have shown once more how important it is).
- The **EU food systems are numerous** and geographical, climatic, soil and habitat differences are huge, as well as dietary preferences and habits. This **diversity is essential**, and its durability will be a sign for the wellbeing of the EU food system(s) (and could be used as sign for a check of the framework - a framework that does not take into account these differences is doomed for fail).
- A real transition can only take place if the **actors in the field** can **find a reasonable place and pace** in this framework and the movement of continuous change, as sustainability is never a given or a status but closer to an everlasting improvement. Assuring food business actors – newer and older ones – to live in a truly viable manner, is the basis of sustainability. Shared responsibility in and for the change, support in special funds, and a system change that keeps the idea of competitiveness are essential.
- **Keep a strong protective hand on the Single market.** Top-down and bottom-up approaches go hand in hand, and a harmonised methodology can help keeping the market easily accessible for newcomers and credible for all actors, including the consumer.



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## Definitions

- **Clear definitions** and a clear scope of the framework will be most important, e.g. for the term 'sustainability', 'sustainable food system(s)', 'system', etc, and a broad approach based on all three pillars (economic, environmental and social incl. health) seems the best. The FAO definition may well serve as good inspiration.

## Some reflections on consumer information and education

### Further educate and trust in the responsible consumer's behaviour

- Many tools are necessary to allow consumers to help moving as well towards sustainable food systems. It must be taken into account that logos and claims are not an obvious incentive that automatically lead to a higher demand for sustainably produced or healthy products by consumers. Education and personal behavioural choices need to be part of the policies towards a consumer and citizen that should always be seen as responsible.
- A harmonised environmental assessment on product bases is an important part and should be based on the European method of product environmental footprint (PEF). Any further provisions, e.g. on communication, need to assure to they are proportionate and science-based.
- With regards to all policy measures, labelling as an example, we need to assure a balance between complexity as true basis for assessment and an overload with simplified – that is often not easily verifiable - information. We would see further digitalisation of (food) information to consumers/ citizens as part of a good solution.

## Consistency between Regulations

### Assure interlinkages, true and deep improvement and a credible approach

- It is important to ensure coherence of the different regulatory frameworks. No trade-offs with food safety can be accepted. Further discussion is necessary to balance with sustainability aspects.
- The fact is that more flexibility is needed for new technologies, innovative production methods that could help to build a sustainable food system. For instance the novel food regulation is too strict and costly. There are also other examples such as water reuse, etc.
- After a thorough impact assessment covering the wider sense of sustainable food systems before building such framework, a regular renewal/ validity check of the upcoming framework once developed and operational– whatever option of changed or adapted legislation will be chosen - would need to be built in.



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- To assure a credible approach, it will be crucial to strike the right balance between the different pillars of sustainability, notably the trade-offs that will have to be made: that is valid for the wider categories of economic, social and environmental sustainability aspects, but also within the categories, as e.g. between land use, water quality and greenhouse gases, or aspects of nutrition 'negatives' that may have an effect on (public or individual) health.
- All actors and supply-chains of the food and drink chain need to be taken into account; in this framework the full diet, the full agricultural production and transformation afterwards or alternatives must be part of the assessment.
- Sustainable food system(s) is/are much wider than single products, for which sustainability cannot be evaluated, as not being consumed by itself. An impact on the wider dietary behaviour, social impact (esp. in rural areas) and the wider 'ecosystem' will be important to assure a true improvement in the system(s).

## Not mix origin information with sustainability

- Local foods and short supply chains are an important tool where this is feasible and when demand exists. At the same time it must be acknowledged that such a model may not be able to feed everyone, especially big urban areas in the world. Other models should not be discriminated. Furthermore, local foods are not always the more sustainable option. Therefore origin does not always equate with sustainability.

## Food safety should remain central

- **Food safety and quality** for humans, with a view of food and nutrition security, animals and feed, human health in the wider sense and environmental perspectives will be part of the wider context of the framework. Based on a **sound and science-based, but holistic methodology**, these criteria should all improve; special situations of balancing them out may still arise and need to be part of the assessment.

## Economic and social impact

### Assure a reasonable or positive impact on economic sustainability

- SMEs are a major part of our European food and of course dairy sector; and we wish to be assured that this important role can be continued and strengthened.
- Recent studies on F2F predict an overall decline in production. This will lead to less export and could affect global food security. Therefore, a thorough impact assessment of all F2F actions on the economic, social and environmental aspects is necessary.



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- It will be crucial to strike the right balance between introducing higher sustainability standards on the one hand, and remain competitive on the other hand, without provoking an externalisation of sustainable practices. The sustainable food system(s) could best be achieved through sustainable business models / incentives / creation of consumer demand/market forces, not through over-regulation.
- We are concerned that a very large majority of consumers will not be able to afford sustainable foods in the long/medium term. But this aspect is of crucial importance for the success of the future SFS and should be further analysed in depth. The price of food is still the main driver for consumers' purchasing decisions. The impact the transition will have on (consumer) prices shall be assessed and quantified in order to know how it could impact demand. To allow for a sustainable transition, this cost needs to be covered.
- We wish a market driven strategy providing businesses, especially SMEs, with the necessary financial incentives to bridge the shift and to invest in future technologies.

## Leave no one behind

- Assuming all sectors will need to play a part in the journey towards more sustainable food production, the starting point at present will be unlike for different (types of) companies. It is important to define a baseline/starting point but also to take account of where we stand today/what has already been achieved in the past. Adequate measures should be taken and help should be provided in order to leave no one behind.

## Options for evaluation

- The four options given for evaluation would all need a view on short, medium and long-term effects, and in all areas of sustainability. The ancient work on scenarios for 'European food and nutrition supply 2050' (as well as similar research projects as 'Food2030') could give an indication on aspects on the longer term, to assure that we move into something that will really support future generations.

## Questions

- Will there be an assessment by regional scope, that is 'local', 'regional', 'national', 'EU', 'international/global'? And can one of the levels (and the given impact) take precedence over others?



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- How can be assured that recent and future science will be taken into account, if it calls for adjustments? How can it be assured that the gaps in current science when it comes to real assessment of 'sustainable food systems' will be filled? We ask for a clear solution of this. Even good links between human nutrition and environmental impacts is only starting to come up, and that seems an essential link.
- How to address paradoxes in the links? We have seen the paradox between food safety and environmental considerations with regards to e.g. packaging, and feel the discussion on durability dates going there as well. How and who should assure the responsibility of the food, the business actors and the impact on the economy in the wider sense? That is valid in times of huge challenges as faced recently, as well as more 'normal' times.
- It must be ensured that the SFS framework is compatible in content and timewise with other ongoing legislative processes such as on green claims substantiation, mandatory origin labelling and Food Information revision in general; how will this be done? This is a very important question for FBOs.