

Brussels, 15th June 2023

RE: Proposal from agri-food products producers and their service and inputs providers for the principles of the Framework on Sustainable Food Systems (FSFS)

Dear Commissioners,

The European agricultural products producers and their service and inputs providers would like to share with you the principles, as well as the key enablers, that we believe should be at the heart of the Framework on Sustainable Food Systems (FSFS) to ensure its success and make our food systems more sustainable.

Principles to be included in FSFS:

1. Food safety and security

Any sustainable agri-food system should be resilient and have food and nutritional security at its centre (including food availability, affordability, and accessibility) while food safety (food hygiene, the health of animals, plants, and people, as well as contaminants and residues) should remain a prerequisite.

2. Inclusiveness

An EU framework for sustainable agri-food systems must adopt a holistic approach, inclusive of all production models, agricultural practices and products that can contribute to improving sustainability across its three pillars (economic, environmental, and social). It needs to take into account the specificities, the existing agricultural challenges and the complexity and diversity of food production systems that exist in different agronomic environments, under different cultural and societal contexts as well as organisational configurations. Sustainability must be assessed based on overall outcomes, rather than being limited to rewarding individual production models and practices. Such an approach would leave no one behind and enable all to contribute, expanding the reach and impact more than a one-size-fits-all EU approach.

3. Generational renewal

In addition, people are the catalyst in transforming agri-food systems. Consequently, it is essential to include all actors and to support generational renewal in agriculture and in other sectors of the supply chain. This goes hand in hand with creating viable, vibrant, and inclusive territories which can provide economic, environmental, and social benefits to both men and women.

4. Transparency and fairness in the food value chain

The EU framework on sustainable agri-food systems needs to be efficient and transparent to prevent unfair trading practices, guarantee a fair remuneration for all actors as well as a fair distribution of the cost and benefits associated with improved sustainability for agri-food products. The concentration of excessive costs and the unjustified burden on producers is a potential risk that must be addressed in the transition to more sustainable agri-food systems. The proportionality principle is key to ensure that measures are fit-for-purpose, necessary, applicable and contribute directly to the policy goals, including a fair distribution among food chain actors. It is also important to bear in mind that consumers are also part of the food chain, have their own part to play and need an incentive and the knowledge necessary to buy more sustainable products.

In this context, it is also important to recognise and strengthen the role of organisational structures such as agri-cooperatives, producer or Interbranch organisations. They are key structures in rural areas that enable the achievement of ambitious environmental objectives while preserving the profitability of their production systems and reinforcing producers' position in the food chain.

5. Progressivity, long-term visibility and legal certainty

Any transition in the agri-food systems requires long-term investments, access to innovation and advice and in light of the effort required, this cannot all be accomplished overnight. It is therefore essential to provide assurances and transition periods long enough to encourage the agri-food sector to make the necessary investments to improve sustainability. Considering the time and the long-term investments required, actors also need visibility and legal certainty on the long term. A framework legislation must support this objective by making rules clear, precise, stable, and predictable as well as consistent with other pieces of legislation. Sustainability requirements should be dealt with existing sectoral legislation, rather than in more general and less targeted legislation.

6. Supporting innovation

Innovation, whether based on technology or social constructs, is a key accelerator for the sustainability of food systems. Investing in the development and implementation of new, better technologies and using the most recent knowledge on plant breeding techniques, for instance, is key for obtaining affordability. Consequently, it is of the utmost importance to support innovation by facilitating its development and access. In this regard, proportionate policy, and measures to guarantee the availability of a skilled work force in the agri-food sector is fundamental as is access to financial investments.

7. One health:

It is essential to have an integrated, unified approach that aims to sustainably balance and optimise the health of people, animals, and ecosystems. Regarding the agri-food systems, as indicated by the FAO¹, this means focusing on promoting food security, food safety and balanced diets, preventing and controlling transboundary diseases, zoonoses and AMR, to protect the livelihoods of farmers from the impacts of plant and animal diseases, and to increase the sustainability and resilience of agri-food systems, with One Health benefits.

8. Circularity and bioeconomy:

When it comes to making agri-food systems more sustainable, the circularity principle is crucial. The agri-food system contributes positively to the whole of society. Most residues, side and waste streams in the agri-food chain can be used either to produce **food, feed, bio-based materials, chemicals, or bioenergy**. Closing nutrient cycles and preventing nutrient losses via food waste would allow a more efficient use of resources, contribute to climate change mitigation and the reduction of its environmental impact. Circularity is also at the heart of what binds crops and the livestock sector, the side-stream of one feeding the other with both being necessary for the sustainability of agri-food systems.

9. Trade and the global outlook:

The work towards more sustainable European food systems should also be seen in a global context. Any new initiative(s) should therefore be created in dialogue with our main trading partners and be based on reciprocity/ or mutual recognition to ensure the competitiveness of EU products, while facilitating the internal and international trade of agri-food products. All measures need to be based on objective and internationally recognised standards to assure compatibility with WTO rules. In addition, a strong EU food system can contribute to food security and development of the global food systems in accordance with the SDGs/Millennium Development Goals.

Key enabling factors for FSFS:

1. Financial support for transition outside of the CAP budget (e.g., Just Transition Fund, Horizon).
2. Policy coherence, both horizontal and sector specific, with existing EU and national legislation and TFEU objectives.
3. Science and evidence-based arguments, guided by the highest standards of impartiality and transparency for all aspects related to sustainability.
4. Safeguards for the functioning of the Single Market
5. Support for a bottom-up approach based on realities on the ground.
6. Alignment with international standards

Given its complexity and the importance the FSFS will have for producers and their service and inputs providers, we believe it is crucial to integrate the above principles and key enablers inside this future legislation.

We would be grateful for your availability for a meeting with you or the responsible Units, at your best convenience, to discuss the above-mentioned points.

We thank you for your time and consideration and we look forward to hearing from you.

Yours Sincerely,

¹ <https://www.fao.org/family-farming/detail/en/c/1614268/>

On behalf of the following organisations:

AREPO - Association of European Regions for Products of Origin

A.R.E.F.L.H - Assembly of European Horticultural Regions

Animal Health Europe - representing manufacturers of animal medicines, vaccines and other animal health products in Europe

AVEC - Association of Poultry Processors and Poultry Trade in the EU countries

CEETTAR - European Organisation of Agricultural, Rural and Forestry Contractors

CEEV - Comité Européen des Entreprises Vins

CEFIC - European Chemical Industry Council

CEVI - European Confederation of Independent Winegrowers

CEJA - European council of young farmers

CIBE - International Confederation of European Beet Growers

Copa-Cogeca - the united voice of farmers and their cooperatives in the European Union

EDA - European Dairy Association

EFFAB - European Forum of Farm Animals Breeders

EFOW - European Federation of Origin Wines

ELO - European Landowners' Organization

Euroseeds - the voice of the European seed sector

FEFAC - The European Compound Feed Manufacturers' Federation

FEFANA - EU Association of Specialty Feed Ingredients and their Mixtures

Fertilizers Europe - represents the interests of the majority of mineral fertilizer manufacturers in the European Union

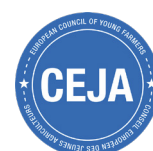
Freshfel Europe - The European Fresh Produce Association

GME - Gelatine Manufacturers of Europe

Growing Media Europe - The international non-profit organization representing the producers of growing media and soil improvers at European level

OriGIn EU - The Organisation for an International Geographical Indications Network

UECBV - European Livestock and Meat Trade Union



Cc:

Annukka Ojala, Member of Commissioner Kyriakides Cabinet Klaus Berend, (acting) Director,
Directorate E, DG SANTE

Alexandra Nikolakopoulou, Head of Unit E1, DG SANTE

Agné Razmislavičiūtė-Palionienė, Member of Commissioner Sinkevičius cabinet

Humberto Delgado Rosa, Director, Directorate D, DG ENV

Robert Konrad, Advisor for Natural Capital, Directorate D, DG ENV

Delilah Al Khudhairy, Director, Directorate A, DG MARE

Frangiscos Nikolian, Head of Unit A4, DG MARE

Joanna Stawowy, Member of Commissioner Wojciechowski cabinet

Catherine Geslain-Lanéelle, Director, Directorate A, DG AGRI

Gijs Schilthuis, Head of Unit A1 DG AGRI

Cristina Rueda-Catry, Member of Executive Vice-President

Dombrovskis Rupert Schlegelmilch, Director, Directorate D, DG TRADE

Flavio Coturni, Head of Unit D3, DG TRADE

Angelika Gruber, Member of Commissioner Breton

Kristin Schreiber, Director, Directorate F, DG GROW

Giacomo Mattino, Head of Unit F3, DG GROW