

# A Farm to Fork Strategy for sustainable food systems

Brussels, 9 March 2020

The European Public Health Alliance (EPHA) strongly supports a **comprehensive transition towards sustainable food systems, with health and well-being as a key pillar of sustainability**. Together with other civil society organisations, EPHA views the Farm to Fork Strategy as an important opportunity to deliver a coherent response to food-related challenges and pave the way towards an integrated, sustainable food policy for the European Union (EU).<sup>1 2 3</sup>

In the current submission to the Road Map on the Farm to Fork (F2F) Strategy, EPHA highlights a number of priorities (non-exhaustive), stressing the need for (1) genuinely **transformative action**, (2) the inclusion of an **action plan for the creation of healthy and sustainable food environments**, (3) to **effectively tackle antibiotics use** in animal farming, (4) to ensure **adequate financing** for the transition and (5) to drive a **global sustainable food systems transformation**.

## 1. A strategy for transformation, not symbolic action

The F2F Strategy is part of the **European Green Deal**, which commits to advance transformative changes in European society and economy by designing a set of “deeply transformative policies”, including in the area of food and agriculture.<sup>4</sup> F2F is also meant to help deliver on **Europe’s Beating Cancer Plan**,<sup>5</sup> another EU flagship initiative, especially in light of the need to reduce the incidence of cancers and other non-communicable diseases (NCDs).<sup>6</sup>

To be able to deliver real answer to the challenges and opportunities faced, the F2F Strategy should be based on solid foundations, realising that:

- The EU food system needs a **fundamental change of direction** considering the severe, interconnected and systemic challenges faced, especially with a view to the health, climate, environmental and socio-economic dimensions of sustainability.<sup>7</sup>
- Food systems transition should not be seen as a ‘zero-sum game’ where benefits in some areas are necessarily off-set by losses in others. Rather, it should be approached as a **positive opportunity** to answer to the aspirations of Europeans for a healthy, equitable and ecologically thriving continent and to build a food system based on **co-benefits**.<sup>8</sup>

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<sup>1</sup> Joint letter (EHN, EPHA, EUPHA) | Farm to Fork needs an effective consumption strategy (2019)

<sup>2</sup> Joint letter (30+ NGOs) | Proposals for a ‘Farm to Fork’ strategy for sustainable food systems (2019)

<sup>3</sup> Joint letter (20 NGOs) | Less and better meat, dairy and eggs in the Farm to Fork Strategy (2020)

<sup>4</sup> European Commission, The European Green Deal, COM(2019) 640 final

<sup>5</sup> European Commission, Health-EU newsletter 249, Ambitious but realistic! The EU unveils first steps toward Europe’s Beating Cancer Plan (2020)

<sup>6</sup> Joint Statement (30+ NGOs) | Prevention at the heart of Europe’s Beating Cancer Plan (2020)

<sup>7</sup> IPES-Food (2019) Towards a common food policy for the European Union

<sup>8</sup> Parsons & Hawkes (2018) Connecting food systems for co-benefits: how can food systems combine diet-related health with environmental and economic policy goals? WHO European Observatory on Health Systems and Policies



- In order to be able to deliver concrete results, the strategy needs to be guided by a set of **time-bound targets**.
- In order to enhance the quality of outcomes, actions under the F2F Strategy should be accompanied by inclusive, transparent and structured **governance processes** that can **evolve over time to address additional actions on food environments**.
- In order to deliver quality results the impact assessments conducted for individual initiatives under the Strategy need to include a thorough and comprehensive **health impact assessment**, with a central role for the **precautionary principle**.
- In order to be able to deliver concrete results, the strategy needs to employ an **effective policy mix** and **avoid excessive reliance on voluntary mechanisms**, such as industry commitments. Experience to date shows that such mechanisms too often fail to deliver verifiable results, risk losing legitimacy and can crowd-out more transformative measures.

### Two voluntary commitment platforms

Two European-level platforms based on voluntary commitments – the EU Platform on Diet, Physical Activity and Health (established in 2005) and the European Alcohol and Health Forum (established in 2007) – have not delivered verifiable added value in addressing the challenges they were meant to tackle. As a result, core civil society organisations involved in these platforms have left both platforms, respectively in 2015<sup>9</sup> and 2019,<sup>10</sup> being unable to justify further engagement in these initiatives.

## 2. Action Plan for healthy and sustainable food environments

Multiple studies attest to the significant, society-wide co-benefits of a transition towards **more healthy plant-rich diets with less and better animal products**.<sup>11 12</sup> In fact, it is increasingly clear that a sustainable food systems transition can only take place if accompanied by a collective shift in eating patterns.

Addressing food consumption patterns is not about telling people what to eat, or about ‘imposing a global diet’. It means **creating enabling food environments** where the healthy and sustainable food options become the default, most attractive and affordable ones. Healthy food policies do not restrict or put the burden of change on individuals, but rather facilitate the adoption of healthy, tasty and sustainable eating patterns by changing the surroundings, opportunities and conditions that influence people’s food and beverage choices.<sup>13</sup>

Many good quality policy recommendations exist for the creation of such enabling food environments – classified under **seven main policy types** (see below) – and these should form

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<sup>9</sup> Press Release | NGOs Resign from Alcohol and Health Forum (2015)

<sup>10</sup> NGOs leave EU Platform on Diet, Physical Activity & Health (2019)

<sup>11</sup> Willett et al. (2019) Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. The Lancet

<sup>12</sup> Springmann et al. (2016) Analysis and valuation of the health and climate change cobenefits of dietary change. PNAS

<sup>13</sup> EPHA (2019) Policies for healthy living environments. Food environments.





the **pillar to the F2F's approach towards consumption and the food chain**. Some of these measures should be taken forward at an EU level, some at national levels with support from the EU, in certain cases further elaboration on the policy details may be required, and sometimes steps forward could be made by eliciting specific and verifiable commitments by economic operators.

The F2F Strategy is *the* opportunity to create a unifying framework to systematically take forward this interconnected set of measures at different scales and levels of governance. Therefore, it should as part of its programme of actions introduce a **dynamically evolving “Action Plan for the creation of healthy and sustainable food environments”**.

EPHA proposes that this Action Plan should be (1) driven by **targets**, (2) guided by **sustainable dietary recommendations**, and (3) led by **good policies**. It should (4) introduce a dedicated framework of action towards **less and better meat, dairy and eggs** consumption and production in the EU, and (5) mainstream food and nutrition security into EU **social policy** initiatives.

### 1) Driven by targets

Target	Achievement	Comment
<b>500 grams of fruit and vegetables</b> per person per day as a population-based average	By 2030	<p>The World Health Organization (WHO) recommends <i>at least</i> 400 grams of fruit and vegetables per day as cornerstone of a healthy diet.<sup>14</sup></p> <p>The EAT-Lancet Commission proposes 500 gram of fruit and vegetables per day as part of a planetary health diet.<sup>15</sup></p> <p>Data source: Consumption levels would be measured/estimated at national levels, following methodologies that can be made comparable across the EU. In as far as needed, Member States would need be supported to improve data gathering capacity.</p> <p>Ensuring mandatory and free disclosure of industry sales data for research purposes is an additional strategy to consider.</p> <p>To ensure that population averages do not hide socio-economic inequalities, improvements in the European Health Interview Survey (EHIS) gathered by Eurostat should be used to track improvement in the frequency of consumption across education levels.<sup>16</sup></p>

<sup>14</sup> WHO (2018) Healthy diet. Fact sheet No. 394

<sup>15</sup> Willett et al. (2019) Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. The Lancet

<sup>16</sup> Eurostat, Daily consumption of fruit and vegetables by sex, age and educational attainment level





		According to the latest data, among respondents in the lowest socio-economic group, nearly one third did not eat fruit and vegetables every day. Only 7% reported eating 5 portions per day or more, which roughly corresponds to at least 400 grams per day.
<b>0% increase in childhood obesity in the EU</b>	By 2025/2030	This is an existing target under the WHO Global Monitoring Framework on NCDs. <sup>17</sup>  0% decrease should not be an average but an absolute, applying for each EU Member State and take into account the socio-economic gradient - i.e. 0% increase among all socio-economic groups.  Data source: WHO Childhood Obesity Surveillance Initiative (COSI). <sup>18</sup>
<b>20-30% decrease in obesity among the adult population</b>	By 2030 (compared to 2016)	New EU target.  Data source: Measurement through Eurostat and/or WHO.
<b>0% of population unable to afford a nutritious meal every second day</b>	By 2030	New EU target.  Data source: Eurostat. <sup>19</sup>
<b>Increase the rate of exclusive breastfeeding in the first 6 months up to at least 50%</b>	By 2025/2030	This is an existing target under the WHO Global Monitoring Framework on NCDs. <sup>20</sup>

## 2) Guided by sustainable dietary recommendations

All EU Member States have nutritional guidelines.<sup>21</sup> Bringing eating patterns closer to existing guidelines will not only improve people's health and cut healthcare costs, but will also provide environmental co-benefits. At the same time, only few countries have explicitly included environmental and other sustainability considerations into their dietary recommendations.<sup>22</sup>

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<sup>17</sup> WHO Global NCD Targets

<sup>18</sup> WHO European Childhood Obesity Surveillance Initiative (COSI)

<sup>19</sup> Eurostat, Daily consumption of fruit and vegetables by sex, age and educational attainment level

<sup>20</sup> WHO Global NCD Targets

<sup>21</sup> European Commission Joint Research Centre, Food-Based Dietary Guidelines in Europe, Health Promotion and Disease Prevention Knowledge Gateway

<sup>22</sup> Fischer and Garnett (2016) Plates, Pyramids, Planet - Developments in national healthy and sustainable dietary guidelines: a state of play assessment. FAO and FCRN





To enhance the contribution to health and other sustainability objectives the F2F Strategy should:

- Drive the **creation and use of sustainable dietary guidelines**. Guiding principles for sustainable healthy diets have already been produced jointly by the Food and Agricultural Organization (FAO) and WHO.<sup>23</sup>
- Considering the interest in and the proliferation of different types of diets in the EU, **dedicated guidelines for healthy vegetarian, vegan and pescetarian diets** (at least) should also be created to provide authoritative recommendations. The creation of guidelines for **specific age groups** should also be considered.

The process of establishing sustainable dietary guidelines should also lead, at the latest two years after adoption of the F2F strategy, to the creation of new targets:

- **Targets on the reduction of meat and other animal products**. Relevant, appropriate and time-bound EU targets for the reduction of animal product consumption (meat, dairy and eggs) should be introduced, for instance with a view on the EU's contribution to a 50% reduction in global industrial animal product consumption and production by 2040;<sup>24</sup>
- **Targets for whole grains and other healthy under-consumed foods**. Many foods that form a cornerstone of a healthy diet are under-consumed in the EU. The Global Burden of Disease study highlights the lack of whole grain intake as an important driver of diet-related diseases.<sup>25</sup> A recent review refers to the importance of dietary fibre intake of between 25-29g per day.<sup>26</sup> The introduction credible and useful targets to increase the intake of whole grains, as well as nuts, seeds and legumes, should be considered.

### 3) Led by good policies

Drawing on the WHO Best Buys and other recommended interventions,<sup>27</sup> **7 main categories of policies** can be identified for the creation of healthy food environments. None of these policies alone, including consumer information, is a silver bullet. They provide a **mutually reinforcing package of measures** necessary to reshape food environments for the benefit of people and planet.<sup>28</sup>

7 POLICIES FOR HEALTHY FOOD ENVIRONMENTS	
<b>1. Tackle unhealthy marketing and advertising</b>	
	<ul style="list-style-type: none"><li>• Amend the Audiovisual Media Services Directive to introduce an EU-wide watershed (6am – 11pm) on audiovisual communications for unhealthy food.<sup>29</sup> [EU regulatory action]</li></ul>

<sup>23</sup> FAO and WHO (2019) Sustainable healthy diets – Guiding principles

<sup>24</sup> 50by40

<sup>25</sup> Institute for Health Metrics and Evaluation. Global Burden of Disease. EU, 2017, all ages, dietary risks

<sup>26</sup> Reynolds et al. (2019) Carbohydrate quality and human health: a series of systematic reviews and meta-analyses. The Lancet

<sup>27</sup> WHO (2017) "Best buys" and other recommended interventions for the prevention and control of noncommunicable diseases

<sup>28</sup> European Heart Network (2017) Transforming European food and drink policies for cardiovascular health

<sup>29</sup> The WHO Regional Office for Europe Nutrient profile model (2015) can be used to single out which foods and drinks would be affected.





<ul style="list-style-type: none"><li>• Amend the Audiovisual Media Services Directive to regulate digital marketing of unhealthy food at least with a watershed. <i>[EU regulatory action]</i></li><li>• Start a consultation and impact assessment process with a view to introducing a dedicated, comprehensive Directive to limit the exposure of children (up to 18 years of age) to the marketing of unhealthy food, including rules on advertising on regular and digital media, on product packaging, sponsorship and product placement. <i>[EU regulatory action]</i></li><li>• Produce an analysis of the needs, gaps and added value of further EU action to ensure adequate child protection, including considering the introduction of marketing standards for commercial foods for infants and young children. <sup>30</sup> <i>[EU supportive action, potentially regulatory action]</i></li></ul>
<b>2. Ensure easy-to-use and reliable consumer nutrition information</b>
<ul style="list-style-type: none"><li>• Amend the Food Information to Consumers Regulation to ensure mandatory front-of-pack nutrition labelling across the EU. <i>[EU regulatory action]</i></li><li>• Establish nutrient profiles under the Nutrition and Health Claims Regulation. <i>[EU regulatory action]</i></li></ul>
<b>3. Introduce healthy pricing policies</b>
<ul style="list-style-type: none"><li>• Develop and promote a policy toolkit to support Member States in introducing effective sugary product levies. <i>[EU supportive action]</i></li><li>• Develop a policy toolkit to support Member States in finding ways to reduce the price of fruit and vegetables, including by minimising value added tax (VAT). <i>[EU supportive action]</i></li></ul>
<b>4. Support sustainable public food procurement<sup>31</sup></b>
<ul style="list-style-type: none"><li>• Leverage EU funding to support sustainable innovation in national and local public food procurement policies. <i>[EU supportive action]</i></li><li>• Create a practical European Sustainable Public Food Procurement guide for national and local procurement officers that integrates procurement standards for the environmental, health, social, locality, animal welfare, fair trade, quality and cultural aspects of food sustainability. <i>[EU supportive action]</i></li><li>• Establish an EU network of food procurement professionals to allow a more effective exchange of experiences in sustainable food procurement. <i>[EU supportive action]</i></li><li>• Amend the Public Procurement Directives to make mandatory the application of elements from the Sustainable Public Food Procurement guide and allow the inclusion of local supply chain criteria in tenders. <i>[EU regulatory action]</i></li></ul>
<b>5. Drive product (re)formulation</b>
<ul style="list-style-type: none"><li>• Introduce an EU initiative accompanied by a policy toolkit to support national (re)formulation efforts. This initiative should look at all measures available to promote reformulation and the formulation of healthier new products, including price incentives and where appropriate mandatory standards. It should also include a thorough assessment of voluntary reformulation agreements and propose mechanisms to increase their effectiveness. <i>[EU supportive action]</i></li></ul>

<sup>30</sup> WHO/Europe (2019) Commercial foods for infants and young children in the WHO European Region

<sup>31</sup> For more detailed recommendations see discussion paper: EPHA and HCWH (2019) Public procurement for sustainable food environments. How can the Farm to Fork Strategy contribute?







<b>6. Create healthy retail, restaurant, urban and school environments</b>
<ul style="list-style-type: none"><li>• Elicit a retail sector-wide commitment across Europe (1) to remove unhealthy foods and drinks from near checkout counters and (2) end (price) promotions of sugary foods and drinks.<sup>32</sup> [EU supportive action]</li><li>• Develop and promote a policy toolkit to support Member States with best practice actions and policies to create healthy school environments. [EU supportive action]</li><li>• Develop and promote a policy toolkit to support local authorities with suggestions for legally sound ways to use urban planning regulation to plan for density of fast food outlets in certain public areas, including around schools. [EU supportive action]</li><li>• Identify methods to incentivise a healthier and more sustainable food offer in out-of-home food establishments, such as restaurants and take-aways, and implement pilot projects to promote policy experimentation and speed-up best practices. [EU supportive action]</li></ul>
<b>7. Ensure independent nutrition education and information</b>
<ul style="list-style-type: none"><li>• Provide an overview of existing ways, in both Europe and beyond, to include nutrition education as part of school and professional education curricula (for instance the medical professions) and promote the mandatory inclusion of nutrition education, with special attention to ensuring independence of materials. [EU supportive action]</li></ul>

#### 4) Introduce a framework for action towards less and better animal product consumption and production

Animal farming and animal product consumption are central to food system sustainability. There is scientific clarity about the **urgent need to transform how we consume and produce animal products**, with potentially vast co-benefits for climate change mitigation, biodiversity, avoiding antimicrobial resistance, reducing levels of agriculture-related air pollution, improved quality of nutrition and a better economy, among others. Without the recognition and commitment to address industrial-scale animal agriculture and food environments that predispose towards the overconsumption of animal products, the viability and credibility of the F2F Strategy will be in danger.

The F2F Strategy needs to introduce a framework of action dedicated to elaborating **pathways towards less and better consumption and production of meat, dairy and eggs** in the EU. It should set binding targets, drawing on the process described above, and put forward a set of measures to reduce industrial animal production, support better animal farming and farmers' livelihoods, and create enabling food environments.

At least, the framework for action should:

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<sup>32</sup> The WHO Regional Office for Europe Nutrient profile model (2015) can be used to single out which foods and drinks would be affected.





- Consider actions and policies proposed by Eating Better in their “**Roadmap to less and better meat and dairy**”, which covers actions in food service, food retail, public policy, producers and processors and investors.<sup>33</sup>
- Explore ways and elaborate proposals to ensure a **fair price for meat** and other animal products.
- Start the process of elaborating an **animal farming method classification system** with special focus on animal welfare standards, for instance by expanding the 0-3 egg marking system to other farm animals and products.

### 5) Mainstream food and nutrition security into EU social policy initiatives

Today, 7% of the EU population older than 16 years of age are unable to afford a hot nutritious meal every second day.<sup>34</sup> In 2017, over 112 million people in the EU lived in households at risk of poverty or social exclusion, equivalent to over a fifth of the entire population.<sup>35</sup> While most of the abovementioned policies can contribute to reducing inequities in health, alleviating poverty and ensuring all people can have access to good food **goes beyond what food policies can deliver and requires alignment with other policies.**<sup>36</sup>

The F2F strategy should therefore include a **special initiative to ensure food and nutrition security is mainstreamed into other EU social policy initiatives**, with special focus on ensuring that no European is unable to afford a quality meal every (second) day.

## 3. Reduce antibiotics use in animal agriculture

Antimicrobial resistance is a major threat to human health, partly driven by the overuse of antibiotics in agriculture.<sup>37</sup> The F2F Strategy needs to contribute to an ambitious implementation of the EU One Health Action plan against AMR.

### 1) Set an antibiotics use target

Target	Achievement	Comment
<b>At least 85-90% of farm antibiotic use should be for individual treatment and at most 10-15% should be for group treatments</b>	By 2030	The ESVAC reports suggest a correlation between the level of sales of antimicrobials used for group treatment and total antimicrobials sales/use in a country: the greater the share of antimicrobials for group treatment, the greater total sales. At the same time, the sales/use of antimicrobials varies

<sup>33</sup> Eating Better. Better by half: A roadmap to less and better meat and dairy

<sup>34</sup> Eurostat. Inability to afford a meal with meat, chicken, fish (or vegetarian equivalent) every second day by level of activity limitation, sex and age

<sup>35</sup> Eurostat (2019) People at risk of poverty or social exclusion

<sup>36</sup> WHO/Europe (2019) Healthy, prosperous lives for all: the European Health Equity Status Report

<sup>37</sup> Review on Antimicrobial Resistance (2016) Tackling Drug-Resistant Infections Globally: final report and recommendations







		significantly between countries, showing large scope for improvement. <sup>38</sup>  Reducing the use of antimicrobials in group treatment will probably result in much lower total antimicrobials use. Putting such target will also align with the spirit of the Veterinary Medicines and Medicated Feed Regulations which ban all purely preventative group treatments and restrict all antibiotic treatments, including group treatments, to non-routine use.
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## 2) Draw-up a list of medically important antimicrobials to be prohibited or restricted for use in animal agriculture

Proposal to **prohibit the use** of the following antimicrobials in animal agriculture:

- Colistin;
- Antimicrobials 'of last resort' for the treatment of serious and life-threatening infections in humans that are not (yet) widely used in agriculture, including carbapenems;<sup>39</sup>
- Any new medically important antibiotics that may appear on the market.

Proposal to **restrict the use** of the following antimicrobials in animal agriculture:<sup>40</sup>

- Fluoroquinolones, and 3<sup>rd</sup>- and 4<sup>th</sup>- generation cephalosporins:
  - Should not be permitted for group treatments;
  - Should not be permitted for preventative use;
  - Individual treatment only when sensitivity testing shows alternative treatments are unlikely to work.

## 3) Ensure the collection of relevant antibiotics use data

The **requirement to collect antimicrobial use data** (not just sales) that will be phased-in over the next years should be at least collected per:

- Animal species;
- Antibiotics family;
- Farming system (e.g. industrial, organic, free range);
- Type of use (e.g. for group or individual treatment).

Classifying use data per animal farming method could allow comparison of the relative performance of different farming methods.

Data on use for individual or group treatment would allow to monitor achievement of the proposed target.

<sup>38</sup> European Medicines Agency (2019) Sales of veterinary antimicrobial agents in 31 European countries in 2017

<sup>39</sup> WHO guidelines on the use of medically important antimicrobials in food-producing animals (2017)

<sup>40</sup> Bangkok Declaration on Antimicrobial Resistance – Food systems and farming (2019)





#### 4) Ensure equivalence of standards for imports from third countries

There is **no good reason for why farmers in the EU should face competition from producers that do not comply with European antibiotic-use standards**. With significantly upgraded EU rules on antibiotics use to come into effect in 2022, the requirement that imported products should not be produced using antibiotics as growth promoters only is no longer equitable.

**Equivalent standards to those in effect in the EU should be required**. Imported animal products should be accompanied by a credible certificate/declaration of not having been produced with methods involving routine antibiotic use or preventive treatment of groups of animals with antibiotics. Products not carrying such assurances should be barred from entering the EU market, or face an equitable import levy.

#### 5) Review the residue limits for antimicrobials in food products

The current residue limits for antimicrobials in food products should be **reviewed based on the principle of 'minimum selective concentration levels'** to make sure the limits set are aligned with developments in scientific evidence.

It should also review whether the frequency of **residues testing** meets needs and expectations.

#### 6) Address the use of substances other than antimicrobials that may compensate for poor animal husbandry practices

Substances not currently classified as antimicrobials, like ionophores and other coccidiostats, and therefore not covered by the Veterinary Medicines and Medicated Feed Regulations **may be used in animal agriculture in high quantities for preventative use**. These substances could be used in a way so as to compensate for poor animal husbandry conditions, may contribute to pharmaceutical pollution in the environment and could be associated with horizontal transfer of resistance.<sup>41</sup>

The F2F Strategy needs to **address the use and the effects of the overuse of such substances**, for instance by adding them into the **scope of the Veterinary Medicines and Medicated Feed Regulations** or by **adapting the Feed Additives Regulation** to restrict their preventative use.

## 4. Ensure adequate financing for the transition

Today, nearly 10% of EU GDP is spent on healthcare. Up to 80% of that spending goes into treating NCDs. Unhealthy diet is a main risk factor for a variety of NCDs, including cardiovascular disease, type 2 diabetes and certain cancers, as well as obesity. NCDs are highly preventable and public health interventions show high returns on investment.<sup>42</sup> A successful F2F strategy will, in the medium and longer term, **lead to considerable cost savings** for Member States, releasing **funds for other transition investments**.

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<sup>41</sup> Alliance to Save Our Antibiotics (2017) Real farming solutions to antibiotic misuse

<sup>42</sup> ECDA, EPHA, NCD Alliance (2019) Towards and EU Strategic Framework for the Prevention of Non-communicable Diseases





In the short term, at least the following activities could contribute to funding the F2F Strategy:

### 1) Ensure Common Agricultural Policy funding aligns with F2F

The European Green Deal commits to ensure that national strategic plans under the EU Common Agricultural Policy (CAP) will fully reflect the ambition of the F2F strategy. The CAP is a major funding mechanism able to provide a significant part of the needed transition funding, especially for farmers. However, **meaningful and concrete alignment of the CAP and F2F can only be achieved** when at least:

- The **F2F strategy includes targets**, such as the ones above, but also targets related to other sustainability dimensions. Without specific targets it is unclear how F2F can provide guidance to national CAP strategic plans.
- The new requirements under the draft CAP Regulation (Article 94 and further) for **meaningful consultation with relevant public authorities and civil society organisations** is put into effect. The Commission should ensure that it can send a draft national CAP strategic plan back to the drawing board if relevant stakeholders have not been consulted or their inputs have not been reasonably considered.

### 2) Allocate research funding for data gathering and policy innovation

Funding under the Horizon Europe programme should be made available for:

- A **pan-European study on consumption patterns across the EU** based on a number of key consumption-related indicators. The study should establish benchmarks and proxies to follow progress towards consumption-related targets under F2F and be updated at regular intervals.
- For **policy experimentation and innovation** in areas referred to under section 2 above.

### 3) Make smart use of policies to promote investment and innovation

**Regulatory standards and levies can prompt economic actors to invest in innovation.** Likewise, and coupled with **earmarks**, product levies can be used as additional sources of transition funding.

For instance:

- The UK **sugar levy** has prompted a widespread reformulation effort by the beverages industry to reduce the sugar content of soft drinks.<sup>43</sup>
- Setting **nutrition-related standards**, for instance on maximum levels of salt in certain much-consumed products, will do the same. Introducing firm **legal protections against the advertising and marketing** of unhealthy foods may promote product innovation and open the space for new ranges of healthier products to make their way onto the market.
- Allocating a share of **public food procurement funding** to short supply chains can lead to positive multiplier effects for local economies.<sup>44</sup>

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<sup>43</sup> Bandy et al. (2019) Reductions in sugar sales from soft drinks in the UK from 2015 to 2018. BMC Medicine

<sup>44</sup> Santini et al. (2013) Short Food Supply Chains and Local Food Systems in the EU. A State of Play of their Socio-Economic Characteristics. European Commission Joint Research Centre





- Various countries have used the **earmarking of health levies** for investments into health systems. Earmarking, if policy-makers follow through on spending commitments, tend to increase public support for levies.<sup>45</sup>
- A recent proposal for a 'fair meat price' levy envisions the revenues from this levy going into a fund that would **earmark expenditures** to provide additional transition funding for farmers, subsidise fruit and vegetables and compensate any reduction in purchasing power of lowest income groups.<sup>46</sup>
- Requiring the **mandatory and free disclosure of industry sales data** for research purposes will provide an additional source of data without additional costs to public budgets.

#### 4) Integrate F2F priorities into wider EU funding mechanisms

A specific scanning exercise is required to **identify opportunities and integrate transition funding requirements related to F2F priorities into other EU funding mechanisms**, as well as into the ongoing debate on the Multiannual Financial Framework (MFF) and the European Green Deal Investment Plan.

Especially, the F2F Strategy should consider how to leverage available funding possibilities, or appropriate a specific budget from different funding streams, including the CAP and the Cohesion and European Regional Development Funds (ERDF) to **support sustainable innovation in national and local public food procurement policies**.<sup>47</sup>

### 5. Drive a global sustainable food systems transformation

In many regions of the world a rapid nutrition transition is taking place that manifests itself in a **double burden of malnutrition**: the coexistence of overnutrition (overweight and obesity) alongside undernutrition (stunting and wasting).<sup>48</sup>

To move towards sustainable food systems globally, the Farm to Fork Strategy should:

- Introduce a public health chapter to EU trade agreements, considering the proposal for a **“model health chapter”** in EU trade and investment agreements.<sup>49</sup>
- Support the elaboration and of a **UN Framework Convention on Food Systems**, modelled on the WHO Framework Convention on Tobacco Control (FCTC) and UN Framework Convention on Climate Change (UNFCCC). Such mechanism would strengthen the ability of countries to act on the right to well-being, reduce the power asymmetries created by multinational food companies, and ensure comprehensive action towards food systems for health, environmental sustainability, social equity and prosperity.<sup>50</sup>

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<sup>45</sup> Wright (2017) Policy lessons from health taxes: a systematic review of empirical studies. BMC

<sup>46</sup> True Animal Protein Pricing Coalition (2020) Aligning food pricing policies with the European Green Deal

<sup>47</sup> For more detailed recommendations see discussion paper: EPHA and HCWH (2019) Public procurement for sustainable food environments. How can the Farm to Fork Strategy contribute?

<sup>48</sup> The Double Burden of Malnutrition. The Lancet Series 2019

<sup>49</sup> EPHA and EHN (2019) A model health chapter in EU trade and investment agreements

<sup>50</sup> Swinburn et al. (2019) The Global Syndemic of Obesity, Undernutrition, and Climate Change: The Lancet Commission report

