Towards a Common Food Policy for the European Union

The Policy Reform and Realignment That is Required to Build Sustainable Food Systems in Europe

EXECUTIVE SUMMARY
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INTRODUCTION

This report argues for a Common Food Policy for the European Union: a policy setting a direction of travel for the whole food system, bringing together the various sectoral policies that affect food production, processing, distribution, and consumption, and refocusing all actions on the transition to sustainability.

It highlights the conflicting objectives of existing policies, and the potential for new synergies to be established. The report maps out a new governance architecture for food systems, and puts forward a concrete vision of the policy reform and realignment that is required in order to deliver sustainable food systems. It offers a package of reforms that are clustered under five key objectives, carefully sequenced over the short-, medium- and long-term, and underpinned by new ways of making policies.

The most ambitious reforms would become viable on the basis of reclaiming decision-making processes from powerful lobbies, bringing new actors around the table, shaping policies in more democratic ways, and allowing new priorities and new coalitions of interest to emerge. In other words, a Common Food Policy can achieve what the CAP, as a Common Agricultural Policy, cannot.

The Common Food Policy vision outlined in this report is not simply the view of scientific experts. It draws on the collective intelligence of more than 400 farmers, food entrepreneurs, civil society activists, scientists, and policymakers consulted throughout a three-year process of research and reflection. It also builds on the findings of major multi-stakeholder scientific assessments, the latest advice of the EU’s in-house scientific bodies, and reform ideas that have already been endorsed by the European Parliament, the European Economic and Social Committee, the Committee of the Regions, and broad civil society coalitions. The Common Food Policy vision therefore seeks to capture the growing consensus on what needs to be done to build sustainable food systems.
Environmental impacts. Europe loses 970 million tonnes of soil every year, with more than 11% of the EU’s territory affected by moderate to high soil erosion. Pesticides and nitrogen-based fertilizers are driving unprecedented impacts on plant and insect life. Biodiversity loss jeopardises a range of environmental services, including the pollination of many food crops, threatening future yields and costing some 3% of global GDP each year. Globally, food and farming systems contribute up to 30% of greenhouse gas (GHG) emissions. The EU imports up to 22 million tons of soya-based animal feed every year, including from South American countries where deforestation (responsible for 20% of global CO2 emissions), evictions, pesticide poisoning, and rights abuses have been alleged in intensive export cropping zones. EU imports have been estimated to account for almost one quarter of the global trade in soy, beef, leather, and palm oil resulting from illegal forest clearance in the tropics. Less than half of EU fish and seafood consumption is met by EU production, meaning that Europe’s impact on global marine resources is also huge. In other words, the EU is increasingly outsourcing the environmental footprint of its food systems. These impacts are exacerbated by the fact that around 20% of the food produced in the EU is lost or wasted each year.

Health impacts. The environmental impacts of food and farming systems threaten human health through a variety of pathways. For example, agriculture is responsible for some 90% of EU ammonia emissions – a major contributor to the air pollution that kills 400,000 Europeans each year. Antimicrobial resistance and exposure to endocrine disrupting chemicals (EDCs) via foods, food packaging, and agricultural contamination of water sources also generate major health externalities. Pesticide concentrations in groundwater are above recommended levels in several Member States. Food systems are also driving health impacts through changing diets. Over 50% of the European population are overweight and more than 20% are obese. Unhealthy diet is the leading risk factor for disease and mortality in Europe, and affects poorer population groups the most severely. Poor diets are responsible for 49% of the burden of cardiovascular disease – the leading cause of death in the EU. Access to healthy and sufficient diets remains out of reach for millions. Today, one in four Europeans are at risk of poverty or social exclusion. In 2016, some 43 million people, or 9.1% of the EU population, were unable to afford a quality meal every second day. Globally, nearly 800 million people still suffer from hunger, while two billion are afflicted by micronutrient deficiencies.
Socio-economic impacts. Poor working conditions and livelihood pressures continue to be observed across food systems, in a context of rapid consolidation and major power imbalances. 70% of the global agrochemical industry is now in the hands of only three companies, and up to 90% of the global grain trade is controlled by four multinationals. In 2011, the five largest food retailers in thirteen EU Member States had a combined market share of over 60%. Dominant players have been able to drive down prices and conditions in supply chains – affecting seasonal migrant labourers, food retail staff, and self-employed delivery workers. Farmers in particular are paying a high price: the share of EU food chain value going to agriculture dropped from 31% in 1995 to 21% in 2018, while farmers faced a 40% increase in input costs between 2000 and 2010. From 2003 to 2013, more than 1 in 4 farms disappeared from the European landscape. Meanwhile, more than 100,000 hectares of EU farmland is lost to urban/industrial development every year. Some 3% of farms now own 52% of EU farmland, and 20% of farms account for 80% of payments under the CAP. In 2010, almost half of farm holders were aged over 55 and one quarter were over 65. The erosion of traditional food cultures and the emergence of fast-paced urban lifestyles has also transformed food preparation and consumption habits, disconnecting people from how food is produced and from concepts such as the seasonality of fruits and vegetables. People are losing trust in the modern food systems on which they increasingly rely. A recent survey found that only 35% of EU citizens trusted supermarkets and only 38% trusted food manufacturers for information about food risks.

Current responses – whether from public policies or from the private sector – are failing to adequately address the deep and interconnected challenges in food systems. The prevailing solutions have only reinforced our reliance on a highly specialized, industrialized, financialized, standardized and export-oriented model of agriculture and food production. This model systematically generates hidden costs (‘externalities’), which are not included in retail prices but are incurred by people around the world and passed onto future generations.
1. INTEGRATION ACROSS POLICY AREAS

A Common Food Policy is needed to put an end to conflicting objectives and costly inefficiencies.

The policies affecting food systems in Europe – agriculture, trade, food safety, environment, development, research, education, fiscal and social policies, market regulation, competition, and many others – have developed in an ad hoc fashion over many years. As a result, objectives and policy tools have multiplied in confusing and inefficient ways. Gaps, inconsistencies, and contradictions between policies are the rule, not the exception. Ambitious anti-obesity strategies coexist with agri-trade policies that make junk food cheap and abundant. The CAP offers premiums for young farmers, alongside a farm subsidy model that drives up land prices and undermines access to land. The EU imposes strict environmental standards, while the advisory services farmers would need to meet them are increasingly ill-equipped to support transition. The EU has made bold commitments to ‘policy coherence for development’ and to address climate change under the Paris Agreement, while promoting increased exports in the high-emitting meat and dairy sectors via new trade agreements.

Mechanisms are lacking to reconcile the trade-offs and contradictions between these competing policy goals. In this context, narrowly-defined efficiency and competitiveness gains tend to be prioritized to the detriment of sustainability and public health. As a result, crucial priorities fall through the cracks and highly damaging trends are allowed to continue, even as they generate huge human, environmental, and economic costs. For example, chronic diseases – often diet-related – account for 70%-80% of healthcare costs in the EU, while food waste costs €143 billion per year in terms of wasted resources and environmental impact. A Common Food Policy would put an end to these costly inefficiencies by changing the way that policies are made: it would be designed to bring different policies into coherence, establish common objectives, and avoid trade-offs and hidden costs (or ‘externalities’). In other words, it would bring major benefits to people and the planet, and would ultimately pay for itself.
2. INTEGRATION ACROSS GOVERNANCE LEVELS

A Common Food Policy is required to harness grassroots experimentation and align actions at EU, national, and local levels.

Social innovation and experimentation is emerging rapidly at the local level, from community-supported agriculture schemes and farmers’ markets to the creation of local food policy councils and urban food policies. These initiatives are highly promising in terms of sustainability (e.g. reducing environmental impacts and reclaiming value for small-scale farmers/food businesses) and in terms of reconnecting actors (e.g. producers and consumers, citizens and local policymakers) in a way that restores democracy, accountability, and trust in food systems.

However, EU and national policies are ill-equipped to encourage this type of experimentation. For example, local food system initiatives tend to be small-scale and/or urban-based, often making them ineligible for CAP funding. Where supportive EU policy frameworks do exist (e.g. flexibilities in public procurement and food safety rules to support small-scale farmers), the opportunities are under-communicated, ineffectively implemented at national/local level, or subordinated to competing priorities such as boosting competitiveness in conventional markets. Supporting local experimentation, promoting social innovation, and building sustainable food systems at the territorial scale remain à la carte options rather than obligations for Member States. Though opportunities exist for local and regional actors to share best practices with one another, far fewer are created for EU policymakers to learn from them and shape EU-level policies and programmes to further support these initiatives on the ground.

Building sustainable food systems is therefore contingent on a deliberate shift towards effective multi-level governance. Rather than focusing primarily on regulating markets and supporting farmers through standardized EU-wide policy tools, the EU must find ways to encourage local food initiatives, which are increasingly circumventing conventional markets and supply chains. Supporting experimentation in all of its diverse forms, through complementary actions at EU, national, and local levels, would be a priority of a Common Food Policy – not an after-thought, and not just a question of legal compatibility.
3. GOVERNANCE FOR TRANSITION

An integrated food policy can overcome short-term thinking and path dependencies in a way that sectoral policies cannot.

Integrating policies across the food system is a prerequisite for tackling urgent global challenges. According to the latest IPCC assessment, global GHG emissions must reach net zero around 2050 in order to limit global warming to 1.5 degrees and avoid the severest impacts. To play its part, it is likely that EU agriculture will have to be carbon neutral by 2030. Urgent action is also required to address biodiversity loss, global hunger, poverty, and the many further challenges identified in the UN Sustainable Development Goals (SDGs). These are not just agronomic challenges. In order to support the emergence of climate-resilient and economically-resilient production models in Europe and around the world, fundamental changes are required across the whole food system – from research policies and supply chain infrastructures to retail practices and trade agreements.

However, current policies have proven slow to adapt to the new challenges, and are locked into the paradigms of the past. Food systems remain focused on providing cheap and abundant calories via mass production of staple commodities, even though this ‘low-cost’ model is generating ever more costly impacts – from the environmental fallout of intensive agriculture to the spread of unhealthy diets and obesity. Current policies and imperatives have co-evolved and reinforced one another over time. Economic incentives (e.g. subsidies, taxes), technological choices, investments in infrastructure, regulatory frameworks, and hurried lifestyles that prioritize convenience – as well as powerful lobbies who benefit from the status quo – are all converging to lock current systems in place. Technological innovations that can be adopted without questioning the logic of current systems – solutions that reinforce rather than challenging the large-scale, monoculture-based production model – continue to be prioritized. The status quo is further entrenched by short-term political cycles, which put a premium on short-term fixes and allow the costs of inaction to be passed onto the next generation.

A different type of policy – a governance framework for transition – is needed to overcome these path dependencies. Only an integrated policy with a long-term vision and a mandate to address the whole system can drive the coordinated shifts that are required across food production, processing, distribution, and consumption (i.e. overcoming the systemic lock-ins). A Common Food Policy, designed with these goals in mind, would allow short- and long-term objectives to be clearly distinguished, trade-offs to be weighted, the long-term costs and benefits (or ‘externalities’) to be captured, accountability to be allocated, and the effectiveness of reforms to be regularly assessed against the agreed objectives. This kind of integrated, pathway thinking was invoked by the European Parliament in May 2018 when it called on the European Commission to develop an “overarching Sustainable Development Strategy encompassing all relevant internal and external policy areas”, including a timeline up to 2030.
4. DEMOCRATIC DECISION-MAKING

A Common Food Policy can revive public participation in policymaking, reconnect citizens to the European project, and reclaim public policies for the public good.

Regulatory capture by powerful interests has become a persistent problem in food systems. The more fragmented food system governance has become, the more easily dominant actors have been able to bring their power to bear in the respective policy silos (CAP, food safety, trade, etc.). The dominant position of agribusinesses/agricultural stakeholders, the European Commission’s DG Agriculture, and the European Parliament’s Agriculture Committee have been identified as key factors in preventing environmental problems being adequately addressed in the CAP, and in stalling EU action on diets. The ability of agribusiness to capture CAP reform processes has grown in the wake of fractures between farmers and environmental groups.

In this context, the gap has grown between the mandate policymakers assume themselves to have, and the boundaries that citizens are keen to reassert when given the chance. This has been exemplified recently by the public reaction against the renewal of glyphosate-based pesticides, and the trade negotiations taken forward by the European Commission (particularly ‘TTIP’ with the US, ‘CETA’ with Canada). In both cases, concerns were raised that the precautionary principle and the protection of public health were being sidelined in the name of short-term economic interests. The formal mechanisms for public participation in policy design are clearly falling short and remain tokenistic. The parameters of CAP reform, for instance, are established behind closed doors in negotiations over the EU budget, without a genuine possibility for civil society to engage. The need to ensure transparent, participatory, and responsive institutions in today’s Eurosceptic climate – to address what the Sustainability Advisor to Jean-Claude Juncker has referred to as the “growing disenchantment of the European citizens with the European construction itself” – has never been clearer.

Moving towards integrated food policies can remedy the democratic deficit in food systems and rebalance power. By shifting the focus from agriculture (and other sectoral policy areas) to food, a wider range of stakeholders can be meaningfully involved in designing and assessing policies. This will allow power relations and path dependencies to be challenged, decision-making processes to be reclaimed from powerful lobbies, and new priorities and coalitions of interest to emerge. In particular, it will pave the way for powerful alliances to be built between all of those with an interest in moving away from the current low-cost, high-external-ity model, and making it pay to produce healthy, sustainable food. This includes farmers, sustainable food businesses, consumer and health groups, development and anti-poverty campaigners, environmental agencies, school officials, locally-based civil society movements, and policymakers seeking to resolve complex and costly problems at various levels of governance.
HOW DO WE GET THERE?
A COMMON FOOD POLICY
BLUEPRINT

Significant policy reform and realignment is therefore required in a range of areas under a Common Food Policy. The first building block is to reform the EU’s governance architecture in a way that allows institutional silos to be overcome and synergies to be maximized between all of those working towards sustainable food systems.

New mechanisms are required to coordinate these efforts, including the following:

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<tr>
<th>SHORT-TERM POLICY PROPOSALS</th>
<th>MEDIUM- TO LONG-TERM POLICY PROPOSALS</th>
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<tr>
<td>Create position of European Commission Vice President for Sustainable Food Systems</td>
<td>Devise a Sustainable Food Scoreboard/Action Plan to track progress in the implementation of a Common Food Policy</td>
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<td>Designate a Head of Food in every Commission DG to ensure inter-sectoral cooperation</td>
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<td>Develop a Sustainable Food Taskforce under the European Political Strategy Centre (EPSC)</td>
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<td>Create a Formal Intergroup on Food in the European Parliament</td>
<td>Introduce participatory process for assessing technological innovations</td>
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<td>Support creation of an EU Food Policy Council</td>
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<tr>
<td>Introduce mechanism for systematic coordination, practice sharing &amp; learning at EU level on local/territorial food initiatives (incl. urban &amp; regional food policies)</td>
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Governance reforms are therefore the first building block of a Common Food Policy. On this basis, reform and realignment could be accelerated across a range of crucial policy areas. Policies can and must become mutually reinforcing on the path to sustainability. It is not possible to encourage shifts towards sustainable production without also encouraging a change in consumption habits, and it is not possible to support small-scale farms without addressing the various tools, including access to land, public procurement, and decentralized small-scale processing facilities, that can enable a new generation of farmers to emerge and secure access to markets.
Policy reforms are grouped under the five objectives below, representing five paradigm shifts that need to occur in parallel in order to build sustainable food systems in Europe:

**OBJECTIVE 1**

**ENSURING ACCESS TO LAND, WATER AND HEALTHY SOILS**

The resource base for EU agriculture is being critically threatened by land degradation, soil erosion, and water contamination and over-extraction, as a result of industrial agriculture and the loss of farmland to urban/industrial development. Access to land for sustainable food production is therefore crucial, but is being undermined by biofuel incentives, urban sprawl, speculative land acquisitions, the failure to protect soils, and a farm subsidy model that drives up land prices. The EU should create an EU Land Observatory to monitor land markets, promote rights of first refusal for young agroecological farmers, allocate CAP payments based on a range of criteria (not just farm size), and move towards comprehensive protection of natural resources under a Land and Soil Directive.

**OBJECTIVE 2**

**REBUILDING CLIMATE-RESILIENT, HEALTHY AGRO-ECOSYSTEMS**

Industrial livestock production and chemical-intensive monocropping are driving high GHG emissions, soil degradation, air pollution, water contamination, and biodiversity loss – undermining critical ecosystem services. High-tech, capital-intensive, digitization-based innovations end up reinforcing existing production models, leading to trade-offs between different environmental impacts, or between environmental and social sustainability. CAP, Research, Innovation, and Extension policies must be urgently reoriented towards low-input, diversified agroecological systems. This means introducing an EU-wide ‘agroecology premium’ as a new rationale for CAP payments, incentivizing nitrogen-fixing legumes, pastures and agroforestry, putting independent farm advisory services in place, promoting farmer-to-farmer knowledge sharing, and ultimately phasing out the routine use of chemical inputs.

**OBJECTIVE 3**

**PROMOTING SUFFICIENT, HEALTHY AND SUSTAINABLE DIETS FOR ALL**

Unhealthy diets are driving an obesity epidemic and an explosion of NCDs: the leading cause of death in Europe. Improving diets requires a range of policies to be realigned – from urban planning to food taxes and marketing rules – to build food environments in which the healthy option is the easiest. Cheap calories can no longer be a substitute for social policies, which must be rebuilt and redesigned to tackle the root causes of poverty and promote access to healthy food for all. The EU must reform public procurement and VAT rules, and comprehensively restrict junk food marketing, in order to shift the incentives in favour of healthy and sustainable diets. Furthermore, the EU should require Member States to develop Healthy Diet Plans (covering public procurement, urban planning, fiscal and social policies, marketing, and nutrition education) as a condition for unlocking CAP payments.
OBJECTIVE 4

BUILDING FAIRER, SHORTER AND CLEANER SUPPLY CHAINS

The standardization, consolidation, and globalization of supply chains has come at a major cost to farmers (who face high costs and a declining share of value), foodworkers (whose working conditions are driven down), the environment (through an explosion of food waste and packaging), and consumer health (through chemical exposures in food/packaging). The loss of small farms, rural employment, and regional processing facilities has sparked a broader rural decline. Solutions are emerging at the local level (e.g. short supply chain initiatives, regional processing hubs, food policy councils). However, they are held back by a failure to communicate existing EU support tools under Rural Development and Cohesion policy, poor implementation and uptake of these tools at national level, de facto exclusion of small-scale farmers from lucrative markets (e.g. public procurement, quality labels), and Circular Economy policies that fail to rethink supply chains. Supporting local, multi-actor, territorial-scale innovation must be built into the design of EU policies, and must become a requirement for Member States, not an à la carte option.

OBJECTIVE 5

PUTTING TRADE IN THE SERVICE OF SUSTAINABLE DEVELOPMENT

EU agri-trade policies continue to promote the interests of powerful export industries, including in the high-emitting meat and dairy sectors. Taking advantage of power imbalances, the EU has pushed through trade agreements that lock developing countries into socially and environmentally harmful export commodity production, while undermining their ability to pursue sustainable development pathways (e.g. via investor protections and restrictive IP rules). Urgent steps are therefore required to remove trade-distorting CAP incentives, to strengthen sustainability clauses in trade agreements, to make food importers accountable for ensuring their supply chains are free from deforestation, land-grabs and rights violations (‘due diligence’), to remove investor protections (‘ISDS’) in trade agreements, and to provide accessible complaints mechanisms for farmers and civil society. Ultimately, free trade agreements must be replaced by sustainable trade agreements, i.e. a new model in which trade liberalization is no longer the primary goal.
**ENSURING ACCESS TO LAND, WATER AND HEALTHY SOILS**

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<tr>
<td><strong>Conflicting land imperatives within CAP.</strong> Young farmer premiums are available under the CAP, yet current area-based payments benefit large-commodity producers, driving up land prices, encouraging land concentration &amp; making it harder for new entrants to access land.</td>
<td>Reform CAP P1 direct payments mechanism by: i) shifting from area-based logic to composite criteria (labor intensity, farm size, regional specificities etc.) with mandatory redistribution to small-scale farms; ii) capping payments to individual farms; iii) providing positive definition of active farmer at EU level; iv) introducing minimum % (instead of ceiling) for payments to young farmers</td>
<td>Develop agencies for land development &amp; rural settlement in all Member States as a condition for unlocking CAP funds, incl. right of first refusal for agroecological producers (based on EU-wide indicators - see Objective 2) &amp; priority for young farmers</td>
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<td><strong>Fragmented environmental governance &amp; low prioritization of soil.</strong> The implementation of EU environmental policies (Water Framework Directive, Nitrate Directive) is undermined by policy frameworks promoting large-scale commodity production (incl. CAP, pesticide approval process &amp; biofuel incentives under the Renewable Energy Directive), unsustainable land development strategies, &amp; enforcement gaps (e.g. monitoring of pesticide residues in soil is not required at the EU level). This reflects deeper environmental governance issues, notably the failure to follow through on the polluter-pays principle, &amp; the disconnection between soil and land governance.</td>
<td>Reform CAP P1 conditionality to include specific clauses of Water Framework, Nitrate &amp; Sustainable Use of Pesticides Directives and include trees as Landscape Features</td>
<td>Adopt EU Soil &amp; Land Directive to reconcile sustainable land development with healthy soils, &amp; coordinate with the Water Framework Directive; integrate new soil management requirements into CAP conditionality</td>
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<tr>
<td><strong>Policies in play:</strong> CAP P1 &amp; P2, ENVIRONMENTAL REGS (WATER FRAMEWORK &amp; NITRATES DIRECTIVES), NATIONAL LAND POLICIES, VGGT, COHESION (STRUCTURAL FUNDS), RENEWABLE ENERGY DIRECTIVE, PESTICIDE APPROVALS, EXTENSION</td>
<td>Establish a European Water Data Centre supporting monitoring in the Member States</td>
<td>Designate areas as permanent farmland for food production under an EU framework</td>
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<td>Task European Soil Data Centre with monitoring pesticide residues</td>
<td>Make access to EU Structural Funds conditional on sustainable land use under integrated territorial food system planning (see Objective 4)</td>
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<td></td>
<td>Promote agroecological soil management via independent Farm Advisory Services (FAS) (see Objective 2)</td>
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REBUILDING CLIMATE-RESILIENT, HEALTHY AGRO-ECOSYSTEMS

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<td>Insufficient climate ambition</td>
<td>Dedicate at least 50% of EU CAP funding to Rural Development (P2) &amp; introduce ‘agroecology premium’ under P2. Eligibility based on: i) EU-level roster of practices (output indicators) incl. crop rotation, diversification, zero synthetic inputs, integrated pest management (IPM), on-farm feed production (i.e. beyond P1 conditionality); ii) working with agroecological extension services; and/or iii) simple proxies (community-supported agriculture (CSAs), participatory guarantee schemes (PGS), Organic 3.0)</td>
<td>Reserve all CAP payments for public goods provision under single pillar (merging of cross-compliance &amp; updated agroecological indicators)</td>
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<td>Failure to address livestock impacts &amp; re integrate production systems</td>
<td>Reserve CAP coupled payments for nitrogen-fixing leguminous crops, permanent grasslands/pastures, fruit &amp; vegetable production, &amp; trees (agro-forestry)</td>
<td>Phase out all coupled payments</td>
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<td>Reliance on techno-fixes</td>
<td>Increase P1 conditionality following REFIT of environmental regulations (see Objective 1)</td>
<td>Phase out routine use of chemical inputs (see also Objectives 1 &amp; 3)</td>
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<td>Reliance on industry for knowledge, inputs &amp; advice</td>
<td>Make CAP funding conditional on setting national antibiotic use reduction targets &amp; enhanced enforcement of the Veterinary Medicines &amp; Medicated Feed Regulations</td>
<td>Introduce livestock density limits (animals/hectare) in line with Organic Regulation</td>
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Policies in play: CAP P1 & P2, ENVIRONMENTAL REGS, CLIMATE CHANGE/EFFORT SHARING, TRADE, COHESION, RESEARCH & INNOVATION, EXTENSION, COMPETITION
## Gaps & Disconnects in Current Policies

### Short-term Policy Proposals

**Failure to build healthy ‘food environments’**. Diets are influenced by physical proximity to food retail outlets & the broader ‘food environment’. However, policymakers have proven recalcitrant to take the requisite actions to reshape public spaces, built environments, lifestyles & consumer habits to promote healthy diets. Private companies have been allowed to shape retail environments, nudge consumers towards unhealthy foods & market junk food to children. The incentives for healthy foods are not strong enough.

- Develop post-2020 EU Childhood Obesity Action Plan with progress monitoring & annual updating of plans (incl. alignment with National Healthy Diet Plans - see below)

- Develop & implement National Healthy Diet Plans (Food Environment Plans) incl. fiscal policies, social policies, public procurement, zoning & licensing, & nutrition education as condition for unlocking CAP funding

- Establish a common mandatory front-of-pack nutrition labelling scheme at EU level

- Establish nutrient profiles under EU Claims Regulation to prevent misleading health claims

- Adopt EU ban on trans-fats

**Cheap food as de facto social policy.** Poverty & social exclusion undermine access to healthy diets via long working hours, poor physical access to healthy food, loss of cooking skills etc. Providing cheap food through mass production of staple commodities or via food banks has become the default solution, but fails to tackle the root causes of poor diets. Robust anti-poverty strategies & social safety nets are required, but are being undermined by national and EU austerity policies.

- Exempt fruits & vegetables from VAT

- Regularly assess levels of food insecurity in the EU; Develop indicators of EU food poverty drawing on annual assessments conducted by Member States

**Failure to connect supply- and demand-side policies.** The supply, pricing & availability of different foods is influenced by agri-trade policies & underlying food system dynamics. Supply gluts & food industry practices help to make highly-processed/HFSS foods cheap and abundant, while fruit & vegetable production is not sufficiently incentivized. EU & Member State policies on diets/services have been piecemeal & tend to ignore agriculture. Procurement policies have been insufficiently used to drive production shifts, while supply-side policies (e.g. CAP promotion schemes) continue to promote unhealthy foods.

- Ensure public procurement supports sustainable farming and healthy diets by i) requiring externalities to be included in cost calculations; & ii) including food sustainability & nutrition guidelines in Green Public Procurement

- Reform EU School Fruit Scheme to i) expand budget; ii) make it mandatory to apply quality criteria; and iii) remove exemptions for added sugar, salt and fat

- Develop EU & national dietary guidelines for healthy and sustainable diets

- Reserve CAP promotion funding for healthy items

### Medium- to Long-term Policy Proposals

**Establish EU directive on marketing of HFSS & highly-processed foods incl. TV advertising bans; prohibition of HFSS product advertising on public transport; ban on HFSS products in public vending machines & supermarket checkout; no-HFSS perimeters around schools; & digital marketing restrictions**

**Develop post-2020 EU Childhood Obesity Action Plan with progress monitoring & annual updating of plans (incl. alignment with National Healthy Diet Plans - see below)**

**Establish a common mandatory front-of-pack nutrition labelling scheme at EU level**

**Establish nutrient profiles under EU Claims Regulation to prevent misleading health claims**

**Adopt EU ban on trans-fats**

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**Develop EU & national dietary guidelines for healthy and sustainable diets**

**Reserve CAP promotion funding for healthy items**

### Policies in play:

CAP, TRADE, FOOD AID, PUBLIC PROCUREMENT, QUALITY SCHEMES, COMPETITION, MARKETING, HEALTH CLAIMS, FOOD SAFETY, ZONING & LICENSING, URBAN PLANNING, FISCAL & SOCIAL POLICIES, EDUCATION
### Gaps & Disconnects in Current Policies

<table>
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<tr>
<th><strong>Persistent power imbalances in supply chains.</strong> Corporate concentration exacerbates vulnerability to unfair trading practices, especially for small &amp; medium-scale farmers. Recent steps to regulate unfair trade practices (UTPs) at the EU level are positive, but will require revisions on an ongoing basis to reflect rapidly evolving markets &amp; to ensure all actors in the supply chain are protected from supply chain dysfunctions.</th>
<th><strong>Short-term Policy Proposals</strong></th>
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<tr>
<td>Include mandatory environmental &amp; social criteria within EU merger regulations</td>
<td>Ensure 4-year review of impacts of UTP regulations &amp; consider respective protections of different actors &amp; root causes of supply chain imbalances</td>
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| **Failure to fully harness short supply chains & territorial food systems.** Short supply chains and other local initiatives hold major potential to address current food system failures, but have yet to be translated into coherent development strategies that span a variety of sectors (e.g. rural development, energy, infrastructure, waste, employment, resource management). Low prioritization of territorial-scale initiatives is evidenced by: the lack of infrastructure/support for small-scale farmers to aggregate supply, add value to their production & access public procurement contracts; poor implementation of food safety & hygiene exemptions for small-scale farmers & certain short supply chain schemes; & insufficient incentives to democratize decision-making. | **Establish EU-level framework to support alternative food system initiatives** | Include sustainable food provision under Regulation (EU) No. 1303/2013 on European structural investment (ESI) funds |
| **Low ambition on food & packaging waste.** Increases in food & packaging waste are linked to long supply chains, the mass retail model & changing lifestyles. Current strategies to address waste (e.g. Circular Economy Package, food banks) fail to address the root causes of over-production & over-consumption. Rather than aim to reduce or rethink food & packaging at the source, existing strategies perpetuate the underlying food system model by focusing primarily on redistribution. Based on voluntary commitments, strategies are plagued by patchy uptake & implementation by member states. | **Target reduced production of waste via supply chain redesign (incl. short supply chains) under review of Circular Economy Package** | **Review Plastics Directive to explore a sequenced phasing out of plastic food packaging** |
|  | **Develop comprehensive regulation to reduce EDC exposure in the food system, including revision of Food Contact Materials regulations** |  |
|  | **Amend EU Plastics Directive to encourage adoption of plastic packaging taxes on food companies & promote local zero-packaging markets** |  |
## OBJECTIVE 5

### PUTTING TRADE IN THE SERVICE OF SUSTAINABLE DEVELOPMENT

<table>
<thead>
<tr>
<th>GAPS &amp; DISCONNECTS IN CURRENT POLICIES</th>
<th>SHORT-TERM POLICY PROPOSALS</th>
<th>MEDIUM-TO LONG-TERM POLICY PROPOSALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Export-orientation &amp; commodity over-specialization reinforced via FTAs. Despite commitments to ‘Policy Coherence for Development’ and climate mitigation under the Paris Agreement, EU agri-trade policies (notably Free Trade Agreements – FTAs) are based on ever-increasing exports in high-emitting sectors like meat &amp; dairy. Taking advantage of power imbalances, the EU has pushed through trade agreements that lock developing countries into low-cost &amp; socially/ environmentally harmful export commodity production, import dependency for staple foods, &amp; reliance on volatile global markets. The ‘sustainable development’ clauses in FTAs lack teeth &amp; are rarely activated.</td>
<td>Reform FTA sustainability impact assessments to include: i) mandatory ex ante sustainability &amp; HR assessment w/ clear def. of sustainability (incl. health &amp; nutrition, reliance on indicators linked to the right to food, gender); ii) participatory methods; iii) mechanisms for regular follow-up &amp; corrective action; &amp; iv) concrete advice for trade negotiators</td>
<td>Promote &amp; adopt UN legally binding instrument on business and human rights &amp; UN Framework Convention on the Right to Food</td>
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<tr>
<td>Ongoing dumping due to competitiveness gaps &amp; practices of multinationals. While the EU’s most aggressive agri-export policies have been curbed, the ‘dumping’ of EU surpluses continues to undercut developing world producers in a range of sectors and regions (e.g. dairy in West/Southern Africa). This reflects underlying competitiveness gaps between developing world producers &amp; highly-subsidized farming systems in the global North, as well as the practices of multinational agri-food industries with huge price-setting power. Meanwhile, EU farmers suffer the impacts of social/ environmental dumping from goods produced in low-cost locations.</td>
<td>Phase out all trade-distorting CAP payments (export subsidies, promotion support), shift away from area-based CAP payments &amp; promote local/integrated feed production (see Objective 2)</td>
<td>Support territorial/ regional supply chains in EU (see Objective 4) &amp; third countries via ‘Aid for Trade’</td>
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<td>Failure to regulate &amp; redirect unsustainable investment flows. EU aid &amp; external investment flows have failed to prioritize local actors &amp; agroecological transition pathways. Furthermore EU policies are failing to regulate &amp; redirect private investment flows away from intensive agriculture, land grabs &amp; deforestation. Self-regulation is insufficient: industry pledges on deforestation largely neglect beef &amp; soy, while companies have repeatedly failed to disclose information about their supply chains.</td>
<td>Create 1-stop-shop portal to track positions adopted by EU/national delegations at the CODEX Alimentarius (FAO-WHO) Commission and at the Committee on World Food Security (CFS); Build capacity of WTO’s Trade &amp; Environment Committee; Introduce mandatory due diligence obligations for all operators in forest-risk commodity supply chains; Introduce sustainability criteria (incl. biodiversity &amp; climate indicators) for EU aid &amp; investment flows, including EIP</td>
<td>Explore a sustainable development clause and/or a Climate Change Waiver within WTO Agreements; Extend due diligence to all agri-food commodities &amp; fish imports; Create ‘Just Transition Fund’ to pool &amp; align development aid, climate financing, &amp; anti-dumping levies</td>
</tr>
<tr>
<td>Policies in play: CAP P1 &amp; P2, TRADE (EPAs, FTAs, ANTI-DUMPING REGS), FISHERIES/IIU FISHING, DEVELOPMENT, AID &amp; INVESTMENT (EIP), FISCAL POLICY, LABELLING/CERTIFICATION, UTPs, NON-FINANCIAL REPORTING</td>
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### POLICY PROPOSALS

#### SHORT-TERM POLICY PROPOSALS

- **Reform FTA sustainability impact assessments to include:**
  - i) mandatory ex ante sustainability & HR assessment w/ clear def. of sustainability (incl. health & nutrition, reliance on indicators linked to the right to food, gender);
  - ii) participatory methods;
  - iii) mechanisms for regular follow-up & corrective action; &
  - iv) concrete advice for trade negotiators.

#### MEDIUM-TO LONG-TERM POLICY PROPOSALS

- **Promote & adopt UN legally binding instrument on business and human rights & UN Framework Convention on the Right to Food**

- **Replace FTAs & EPAs with ‘sustainable trade agreements’ where trade liberalization is contingent on regulatory cooperation & right to regulate, diversification & rebuilding of food production capacity**

- **Introduce CO₂ tax (border adjustment) & exclude high-GHG goods from liberalization**

- **Support territorial/ regional supply chains in EU (see Objective 4) & third countries via ‘Aid for Trade’**

- **Explore a sustainable development clause and/or a Climate Change Waiver within WTO Agreements**

- **Extend due diligence to all agri-food commodities & fish imports**

- **Create ‘Just Transition Fund’ to pool & align development aid, climate financing, & anti-dumping levies**

### PROPOSALS

#### SHORT-TERM POLICY PROPOSALS

- **Phase out all trade-distorting CAP payments (export subsidies, promotion support), shift away from area-based CAP payments & promote local/integrated feed production (see Objective 2)**

- **Adopt definition of dumping that includes explicit social, economic, environmental, health & animal welfare criteria**

- **Aggregate info & complaints on dumping across sectors/regions & through intermediary countries**

#### MEDIUM-TO LONG-TERM POLICY PROPOSALS

- **Support territorial/ regional supply chains in EU (see Objective 4) & third countries via ‘Aid for Trade’**

- **Explore a sustainable development clause and/or a Climate Change Waiver within WTO Agreements**

- **Extend due diligence to all agri-food commodities & fish imports**

- **Create ‘Just Transition Fund’ to pool & align development aid, climate financing, & anti-dumping levies**

### POLICIES IN PLAY

- **CAP P1 & P2, TRADE (EPAs, FTAs, ANTI-DUMPING REGS), FISHERIES/IIU FISHING, DEVELOPMENT, AID & INVESTMENT (EIP), FISCAL POLICY, LABELLING/CERTIFICATION, UTPs, NON-FINANCIAL REPORTING**
CONCLUSIONS

Ultimately, this report represents a call to action. With political will, we can make this vision become reality. We invite the EU institutions and the Member States to take the process forward into its next phases and flesh out a full vision of a Common Food Policy, continuing to harness the collective intelligence of food system actors. Opportunities must be seized to develop and promote a Common Food Policy in the remit of reflections on food systems governance that have already been opened. The European Commission’s long-term vision for implementing a sustainable development strategy, now under discussion, represents a key window of opportunity. The current CAP reform process, and the revamping of research and innovation policies, also present opportunities for embedding integrated food system thinking and moving towards a Common Food Policy.

The cross-cutting, cross-border challenges in food systems can only be met with renewed leadership at EU level – with a Common Food Policy to guide the transition to sustainable food systems, and with sectoral policies that protect the single market and uphold the values of financial solidarity and equitable development across Europe and around the world. But a Common Food Policy must not become another top-down policy. It must be designed to listen more closely and respond more readily to the concerns and aspirations of citizens. In a context where CAP reforms, pesticide authorizations, and trade negotiations are alienating citizens, the Common Food Policy offers a Plan B for Europe: a way to reclaim public policy for the public good and to rebuild trust in the European project.
ABOUT IPES-FOOD

The International Panel of Experts on Sustainable Food Systems (IPES-Food) seeks to inform debates on food systems reform through policy-oriented research and direct engagement with policy processes around the world. The expert panel brings together environmental scientists, development economists, nutritionists, agronomists, and sociologists, as well as experienced practitioners from civil society and social movements. The panel is co-chaired by Olivier De Schutter, former UN Special Rapporteur on the Right to Food, and Olivia Yambi, nutritionist and former UNICEF representative to Kenya.

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READ THE FULL REPORT
www.ipes-food.org/pages/CommonFoodPolicy

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