‘Towards a Common Food Policy for the EU’
Framing paper for the EU Food and Farming Forum 2018

Summary

This framing paper makes the case for an EU Common Food Policy and provides a concrete vision of what it could look like.

It identifies the sustainability challenges facing the EU’s food and farming systems (Section 1) and it argues that the absence of a more robust governance framework undermines the ability of current policies to respond to those challenges (Section 2).

It puts forward a set of concrete proposals for reforming, redesigning and realigning a range of policies under an umbrella ‘Common Food Policy’ in order to guide the transition to sustainable food systems in Europe (Section 3), and lays out the rationale behind these proposals (Section 4).

While IPES-Food has led the drafting of this framing paper, the diagnosis put forward is the result of collaborative work among more than 30 organizations. This framing paper aims to provide the basis for further deliberation and development of the ‘Common Food Policy’ vision among a wider range of stakeholders at the EU Food and Farming Forum (29-30 May 2018).
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1. Sustainability challenges: Why do we need a fundamental change of direction in EU food and farming systems?

EU food and farming systems require a fundamental change of direction in light of the severe, inter-connected and systemic challenges they face. Current responses - from public policies, from the private sector - are failing to adequately address those challenges and set food systems on a sustainable course.

**Consumption-related health risks.** Current food systems are characterized by an overproduction of energy-dense but low-nutrient processed foods. This has contributed to unhealthy and imbalanced diets across the EU - in particular insufficient consumption of fruit and vegetables, whole grains, pulses, nuts and seeds, and the overconsumption of red and processed meat and foods high in fat, sugar and salt. This is driving a series of health risks, particularly for poorer population groups. Over 50% of the European population is overweight and more than 20% are obese. Unhealthy diet is the leading risk factor for all healthy life years lost in Europe. Poor diets are responsible for 49% of the burden of cardiovascular disease, which remains the leading cause of death in the EU. Chronic diseases account for 70%-80% of healthcare costs, corresponding to an estimated €700 billion per year in the EU - a figure likely to grow.

**Environmental impacts.** Globally, food and farming systems contribute up to 30% of greenhouse gas (GHG) emissions, and are one of the major drivers of land degradation and biodiversity loss. Humanity has gone furthest beyond its ‘safe operating space’, crossing ‘planetary boundaries’, in the domains most closely linked to agriculture - loss of genetic diversity and the disturbance of phosphorous and nitrogen cycles. 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. Furthermore, pesticides, associated with high levels of nitrogen use, are driving unprecedented impacts on plant and insect life. More than 75% of flying insects have disappeared in 25 years, jeopardising the pollination of many food crops and threatening yields. The environmental impacts of food systems are exacerbated by the fact that around 20% of the food produced in the EU is wasted.

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3 EHN, 2017. Transforming European food and drink policies for cardiovascular health.
each year, equating to 180kg of wasted food per person, 170 tonnes of CO2 emissions, costing €143 billion in terms of wasted resources and environmental impact⁹.

**Health risks linked to environmental contamination.** The environmental impacts of food and farming systems threaten human health through a variety of pathways. For example, 90% of EU ammonia emissions come from the agricultural sector, and ammonia is a major contributor to the air pollution that is responsible for 400,000 deaths annually¹⁰. Antimicrobial resistance and exposure to endocrine disrupting chemicals (EDCs) via foods, food packaging and agricultural contamination of water sources also generate major health risks¹¹.

**Socio-economic challenges for farmers.** Farm livelihoods are also in crisis, particularly in the small-scale, family-farming sector. Input costs in the EU increased by almost 40% between 2000 and 2010 while farmgate prices remained low, leading the European Parliament to raise concerns about the viability of the farming sector¹². Average farm incomes are now on an upward trend across the EU, but these figures mask major variation between and within member states. In 2016, around 30% of French farmers had an income below €350/month, less than one third of the minimum wage¹³. From 2003 to 2013, more than 1 in 4 farms disappeared from the European landscape¹⁴. This is mostly due to high capital requirements, debt, and the resulting consolidation of land in the hands of bigger farms. Some 3% of farms now account for 50% of EU farmland, and 20% of farms account for 80% of payments under the Common Agricultural Policy (CAP)¹⁵. Many farms have no clear successors, and face the prospect of closing down or being absorbed by neighbouring farms: in 2010, 48% of farm holders were aged over 55 and 25% were over 65. Furthermore, land speculation has skyrocketed, particularly in peri-urban areas, accelerating the consolidation of farmland. From 2006-2012, some 107,000 ha/year were converted to residential and construction uses across the EU²⁸¹⁶.

**Poor working conditions in supply chains.** Sub-standard and exploitative working conditions continue to be observed in the EU and globally, in a context of highly concentrated food supply chains, major power imbalances and constant pressures to

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drive down prices\textsuperscript{17}. This concerns all segments of the food chain, from production to retail: seasonal and migrant workers who represent the backbone of European agriculture systematically face dire working conditions; ‘self-employed’ bicycle riders who deliver food across European cities face legal battles to be recognized as employees; fast food workers and other retail staff are turning to strikes (e.g. McDonald’s UK workers) in the face of poor pay and conditions.

Furthermore, the sustainability of global food systems is contingent on EU production and consumption trends. A land area of 30-35 million hectares outside the EU is required to satisfy its food and feed import requirements, representing half the surface area of France\textsuperscript{18}. The EU imports up to 22 million tons of soybean and soybean cake annually\textsuperscript{19}, and much of this protein feed is sourced from South American countries where deforestation, evictions, pesticide poisoning, and rights abuses have been alleged in intensive export cropping zones\textsuperscript{20}. Intensive (export-oriented) production systems also have knock-on effects on local food security and water availability\textsuperscript{21}, and ultimately contribute to out-migration.

These trends reflect the realities of the increasingly specialized, industrialized and financialized model of agriculture and food production that has taken root in Europe and around the world. Over decades, crop and livestock production have been increasingly disconnected, while crop production has specialized in cereals to the detriment of permanent and temporary grasslands, protein crops and oilseeds\textsuperscript{22}. The disconnection between crops and livestock, and the specialization and intensification of both sectors, explains many of the environmental impacts of European food and farming systems (e.g. generating water pollution via manure and via the synthetic inputs that replace it in intensive cropping systems; requiring large volumes of protein feed imports; and relying on irrigation in water-scarce intensive cropping areas). Seed production units, small-scale processors, dairies and slaughterhouses have disappeared from many regions and been subsumed into centralized operations, alongside increasing reliance on global markets and long value chains. Globalization and trade liberalization have deepened commodity specialization around the world; European agriculture has become increasingly export-oriented, while relying on high levels of protein feed imports.

\textsuperscript{17} IPES-Food, 2017a.
Furthermore, food systems have become increasingly concentrated in terms of market share, economic power and political power. Consolidation within and across the commercial inputs, farm machinery, processing and food retail sectors is advancing at unprecedented rates, with recent mega-mergers allowing a handful of companies to set prices and conditions in global value chains\textsuperscript{23} - as well as exercising major influence over decision-making (see Section 2).

These shifts have been compounded by macro-economic, demographic and cultural changes. More than half of the world's population, and nearly 75% of Europeans, now live in cities\textsuperscript{24}. Policies oriented towards urban growth and expansion have led to the loss of agricultural land (see above). A series of concurrent trends have eroded traditional food cultures and paved the way for systems of mass production, mass retail and mass consumption: peasant cultures\textsuperscript{25} have been lost; fast-paced lifestyles and full-time employment have left reduced time for food cultivation and preparation; supermarkets have spread to the detriment of local markets, grocery stores and other forms of exchange\textsuperscript{26}; major shifts in price/affordability have allowed some foods (e.g. meat) to become embedded in daily consumption patterns.

A 'low-cost' food system has emerged - but has proven costly on many fronts\textsuperscript{27}. While EU households on average spend less than 15% of their household budget on food\textsuperscript{28}, almost 1 in 4 Europeans are today at risk of poverty or social exclusion\textsuperscript{29}, and more than 40 million citizens – over 8%– live in a state of severe material deprivation\textsuperscript{30}. Access to fresh food and a high-quality, varied diet (including organic food) is highly dependent on people's socio-economic status, with inequality rising across Europe\textsuperscript{31}. Millions of people are now turning to food banks\textsuperscript{32}, with as much as 8.7% of the European population affected by food insecurity in 2011, up from 6.5% in 2003\textsuperscript{33}. In 2016 some 43 million people, or 9.1% of the EU population, were unable to afford a quality meal every second day\textsuperscript{34}. In a context of downward price pressures and tight

\textsuperscript{23} IPES-Food, 2017b. Too big to feed: Exploring the impacts of mega-mergers, concentration, concentration of power in the agri-food sector.
\textsuperscript{33} According to the Survey of Income and Living Conditions (EU-SILC), in which households are asked whether they can afford a “quality meal” every other day. See Davis, O., and Geiger, B.B., 2017. Did Food Insecurity rise across Europe after the 2008 Crisis? An analysis across welfare regimes. Social Policy and Society, 16(3).
margins, farmers and foodworkers are often among the poorest and most marginalized members of society.

Furthermore, people have become disconnected from food in a variety of ways: geographic distancing (via the expansion of cities and longer supply chains); economic distancing (via increased intermediaries in long supply chains); cognitive distancing (via loss of familial and cultural ties between urban dwellers and the farming world); and political distancing (a sense of loss of control over food and farming systems). In other words, consumers are losing sight of the value of food, its nutritional qualities, and concepts such as the seasonality of fruits and vegetables. A recent survey found that only 35% of EU citizens trusted supermarkets and only 38% trusted food manufacturers for information about food risks.

Nonetheless, modern food systems have been largely successful in delivering large volumes of major food commodities and in increasing the safety of food supply chains, i.e. in meeting the initial goals of EU food and farming policies. Highly competitive export-oriented sectors have been able to flourish and expand to new markets: some 20,000 jobs in the EU agri-food sector were supported by recent trade liberalization with South Korea, Mexico and Switzerland, for instance. Furthermore, reductions in chemical input usage and EU agricultural GHG emissions have occurred over recent years. Indeed, these trends have led some to question the notion of a crisis in food and farming, and to express confidence about overcoming challenges via technology-led, market-led and industry-led change, based on the ability of large companies with extensive supply chains to reach large numbers of people. The case for increasingly intensive, large-scale commodity production in the EU has been underlined in a context of global food insecurity. According to the FAO, 66 countries are currently incapable of meeting domestic food needs, a number that is likely to increase in the face of climate change.

To many observers, however, European food and farming systems are facing a series of deep and inter-connected crises that cannot be addressed by short-term technological fixes and one-dimensional solutions. As stated by 150 NGOs, the current system is working for the few not the many - while the spiralling social and

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environmental impacts stand to affect the quality of life of all citizens. The underlying food and farming model (specialized, industrialized, financialized) systematically generates a range of costly externalities that are not reflected in retail prices, but are incurred by EU citizens and people around the world. Such a system does not offer a recipe for reconciling the various sustainability challenges. While large firms can drive rapid change, they also rely on a high-volume, low-margin model that favours large-scale, highly-specialized suppliers, thereby exacerbating the social and environmental challenges described above. And while innovation holds major promise to drive sustainable practices, technology-driven and market-driven change is not happening fast enough. The incentives for protecting resources, promoting biodiversity and sequestering carbon are still insufficient to reorient innovation pathways. For example, total pesticide usage continues to increase in several countries42, while the long-term effects of ever-changing active ingredients at various exposures remain difficult to monitor. Meanwhile, reliance on imported feed continues to grow, helping to offset the benefits of less GHG-intensive agriculture in the EU43. And while the current system has kept food prices relatively low in historical terms, and has delivered a fairly stable and abundant supply of food commodities, this has not provided a sufficient basis for eradicating food insecurity in the EU or globally, let alone promoting sustainable and healthy diets for all.

As described above, the challenges in food systems are inter-connected and severe in nature. Technological innovation cannot be expected to deliver the scale, scope or pace of change that is required without a radical shift in economic incentives. The innovations that are most urgently required are social, organizational and governance-based - and without them, much-needed technological innovations will not reach their full potential.

2. Governance challenges: What is a ‘Common Food Policy’ and why is it required?

The difficulties in addressing the challenges in food systems reflect failures of political prioritization, but also fundamental shortcomings in the way that policies are designed, who designs them, and how they fit together. A coherent vision of what European food systems should deliver, and how the costs and benefits should be shared, is currently missing. The policies, processes and norms that shape food systems (i.e. food systems governance) respond to an array of competing forces, from the liberalization of European and global markets to an active civil society increasingly demanding food

42 For example, pesticide usage rose by 5.8% in France between 2011 and 2014. See: http://www.bioalaune.com/fr/actualite-bio/32477/lutilisation-des-pesticides-toujours-en-hausse-en-france
43 "Increased market integration combined with rising global demand for land-based commodities can have the effect of offsetting the benefits of increased productivity, resulting in continued pressure to clear remaining areas of native vegetation." IPBES 2018.
system sustainability\textsuperscript{44}. These various imperatives have led to a fragmentation of food systems governance, a lack of overarching objectives, and conflicting policy goals.

Issues related to food have been compartmentalized through reductionist-technocratic solutions that insufficiently account for its cultural importance and its inter-connectedness with other sectors and arenas of society\textsuperscript{45}. Efficiency-driven technical fixes have been promoted without accounting for the wider implications of these pathways, e.g. how robotics and automation reduces employment and leads to consolidation of economic power (e.g. amongst food processors), or how dependence on expensive technologies can reduce the autonomy of food producers. In other words, food has generally been considered as a commodity/industry, rather than as demanding democratic governance in the collective interest or as a human right\textsuperscript{46}.

Policies have developed in ad hoc fashion: market competitiveness goals have generally taken precedence, and been served by a core of well-resourced ‘common’ policies (e.g. CAP, Trade). Meanwhile social and environmental objectives have been subject to more fragmented governance and lower prioritization – and premised on ever-increasing agricultural productivity, competitiveness and agri-food exports.

Power imbalances have played a key part in shaping these priorities. Powerful actors have been able to frame the questions around specific challenges, and to offer the relevant solutions (e.g. productivity-enhancing technologies), bringing their power to bear in the highly-compartmentalized policy processes that have emerged\textsuperscript{47}. For example, some authors have identified the dominant position of agribusinesses/agricultural stakeholders, the European Commission's DG Agriculture and the European Parliament's 'COMAGRI' as key factors in preventing environmental problems being adequately addressed in EU policies\textsuperscript{48}, and in stalling action on healthy diets\textsuperscript{49}. Public consultation in regard to EU policies tends to be tokenistic, given that parameters are often set behind closed doors. For example, CAP reform options tend to be established upstream in negotiations over the EU budget (‘MFF’). This has contributed to a persistent ‘democratic deficit’\textsuperscript{50}, both in the sense that top-down policies (particularly at EU level)


\textsuperscript{47} IPES-Food, 2017b.


\textsuperscript{50} While perceptions of the EU have been slowly rebounding, 71% of people feel their voice does not count at EU level. Pew Research Centre, 2014. http://www.pewglobal.org/2014/05/12/a-fragile-rebound-for-etu-image-on-eve-of-european-parliament-elections/
appear unresponsive to the interests of those marginalized by current food systems, and in the sense that they are perceived as indifferent to other levels/forms of food system governance (e.g. local initiatives).

The fragmentation of food systems governance results in a poor alignment of the policies affecting EU food and farming systems. As the following examples show, these policies frequently respond to incoherent and conflicting objectives, miss out on synergies, and allow key priorities to fall through the cracks:

- A recent study by 45 experts identified shortcomings in the EU's ability to deliver food security as a result of conflicting interpretations of the term, among other ‘food system governance deficiencies’;
- While the EU has pledged to align all policies with climate and development goals, EU agri-trade policies (e.g. promotion support) continue to encourage producers in high-emitting sectors like meat and dairy to seek new export markets;
- While the EU promotes the right to food in international negotiations, attempts to develop a rights-based approach to food and agricultural issues at EU/member state level have been minimal;
- A series of policies and roadmaps have been developed to tackle obesity, but they have failed to adequately address its root causes, including the role of the food industry and food production incentives/policies (which remain poorly aligned with dietary guidelines);
- Protecting soils in the face of degradation and nutrient loss could deliver major environmental and health benefits, but the EU and member states have failed to act on this basis and the proposed Soil Framework Directive remains stalled since 2006;
- The job-creating potential of sustainable agriculture has been largely ignored in the EU’s quest to reduce unemployment and create ‘green jobs’;
- The viability of small-scale farms is potentially supported by Rural Development policies and exemptions from food safety rules, but these schemes remain optional at member state level, while the administrative burden

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51 Other deficiencies included power imbalances, low institutional capacities, a failure to deal with cross-scale dynamics, the inability to address issues related to persistent inequalities in food rights and entitlements, and increasing geopolitical and sectorial interdependencies. See Moragues-Faus, A., Sonnino, R. and Marsden, T., 2017. Exploring European food system vulnerabilities: Towards integrated food security governance. Environmental Science & Policy, 75, 184-215.
52 These commitments have been made in regard to the SDGs, the Paris agreement and the EU's pledges on Policy Coherence for Development, as referred to in Art. 208(1) of the Treaty on the Functioning of the European Union. Retrieved from: https://ec.europa.eu/europeaid/policies/policy-coherence-development_en
54 IPBES, 2018.
55 Regulation (EC) 854/04 exempts small farmers selling products directly to consumers from the Hazard Analysis and Critical Control Point (HACCP) system for food safety. However, not all member states capitalize on these allowances.
of meeting EU regulations and qualifying for support schemes remains difficult for smaller farms to meet\textsuperscript{56};

- Strategies looking collectively at the sustainability challenges and production potential of different protein sources - including vegetable proteins, fisheries, aquaculture, land-based animal farming and their feed chains - are still embryonic;
- EU and national policies have done little to support local food initiatives, and have even undermined them in some cases (e.g. via restrictive public procurement rules\textsuperscript{57} that hold back short supply chain and local sourcing initiatives).

As these examples show, the under-prioritization of social and environmental issues, and the tendency to develop policies in isolation from one another, are two sides of the same coin.

**A ‘Common Food Policy’\textsuperscript{58} at EU level can provide the basis for new modes of governance and policymaking that are commensurate to the challenges that food systems are facing.** First and foremost, a Common Food Policy is required to bring a range of poorly aligned policies under one roof and subject to clear and consistent objectives (i.e. a transition to sustainability). This ‘umbrella’ policy must align actions across different policy areas (e.g. agriculture, trade, environment, food safety, health, research) and different levels of governance (European, national, local). Only an integrated policy with a mandate to address the whole system can sequence the coordinated shifts that are required across food production, processing, distribution and consumption etc. A food policy can provide a framework for transition in a way that sectorial policies cannot, paving the way for redesign of food and farming systems, and ensuring that new paradigms (e.g. agroecology) are embedded across policies - rather than being treated as discrete technologies\textsuperscript{59}.

Furthermore, **moving towards integrated food system governance provides an opportunity to make the delivery of public goods an explicit, cross-cutting goal of EU policies.** Delivering public goods (e.g. environmental protection, climate mitigation) featured among the objectives of the 2013 CAP reforms and underpinned attempts to


\textsuperscript{57} The EU Green Public Procurement (GPP) scheme (under the legal framework of Public Procurement Directives 2014/24/EU and 2014/25/EU) provides a voluntary framework to encourage public bodies to sustainably procure goods and services; although some flexibility is provided and rules have been circumvented in some cases (see Section 4.5), the EU Public Procurement Directives present impediments to giving priority to local sourcing.

\textsuperscript{58} While ‘Common Food Policy’ is the term used in this process, terms such as a ‘Comprehensive Food Policy’ or ‘Sustainable Food and Farming Policy’ may also capture the integrated, umbrella nature of the policy framework being described. However, the ‘Common Food Policy’ in question should not be confused with (or reduced to) a food security policy, a food safety policy or a food industry policy; nor should it be read to require the transfer of new powers or competences to the EU.

'green' the CAP; however, this commitment was subordinated to other priorities as the process evolved\textsuperscript{60}. Integrated food system governance, rooted in a holistic view of food systems and the public goods they must provide, paves the way for cutting across private interests, avoiding costly trade-offs between different policies and priorities, and preventing hidden costs (or 'externalities') being generated for future generations or in other parts of the world\textsuperscript{61}.

Rather than presenting a barrier to reform, alignment with EU treaty objectives can guide the process of policy integration around public interest objectives. In particular: the promotion of the well-being of the population, sustainable development and a high level of protection and improvement of the quality of the environment (Art. 3, TEU, and Art. 11 and 168 TFEU); compliance with the requirements of policy coherence for development (as required under Art. 208 TFEU); and taking the protection of human health, the welfare requirement of animals, and consumer protection, as transversal requirements in all initiatives and policies (Art. 9, 11, 12 and 13 TFEU).

Developing a Common Food Policy also goes hand in hand with realizing the right to food and meeting the commitments of the SDGs - both of which require integrated policy approaches, clear division of responsibilities (e.g. between different governance levels) and an emphasis on participation and accountability. A rights-based approach is applicable not only to civil and political rights, but also to economic, social and cultural rights (e.g. access to adequate food, sustainable livelihoods, health)\textsuperscript{62}. It draws attention to root causes of problems in power disparities within a system, and how these differences affect the creation and implementation of policy\textsuperscript{63}. It holds states accountable as duty-bearers, and assumes the translation of universal human-right standards into locally appropriate benchmarks for measuring accountability.

A Common Food Policy can also spark a shift towards meaningful public participation in policymaking. By shifting the focus from agriculture (and other sectoral policy areas) to food, a wider range of stakeholders can be involved in designing and assessing policies. This will allow power relations and path dependencies to be challenged, paving the way for alliances to be built between all of those with an interest in moving away from the current low-cost, high-externality model, and making it pay to farm sustainably (i.e. farmers, sustainable food businesses, consumer and health groups, environmental NGOs etc.). Locally-based civil society movements - hitherto under-represented in European policy debates - will also be able to form alliances and increase their participation in shaping the policies that affect them (at EU, national level).


This shift can draw on EU treaty provisions for participatory and deliberative democracy (Art. 11 of the EU Treaty) and the role of the European Economic and Social Committee as a promoter of civic dialogue and participatory democracy.

However, the greatest challenge is to translate these imperatives into the concrete structures and mechanisms of a future Common Food Policy in a way that promotes a transition to sustainability. These questions cannot be resolved in this framing paper, and require democratic deliberation at the EU Food and Farming Forum and beyond. It is nonetheless possible to identify some key orientations for this new governance framework.

Firstly, to respond to the challenges described above, food systems governance would need to be redesigned in a way that promotes systematic recourse to high-leverage, integrated solutions. In particular, an integrated food policy framework must allow for deliberate assessment of new technologies, within designs that emphasize the interconnections with nature (biodiversity-based), and the connections between production and consumption. Concretely, this calls for boundary-spanning structures (e.g. cross-sectoral taskforces, cross-cutting supervisory structures) that can bridge the mandates of different departments in EU institutions. Reforms can build on existing precedents of inter-sectoral collaboration and policy integration. For example EU research priorities are increasingly being framed around food systems goals/challenges, with an emphasis on transdisciplinarity (both in the Horizon-2020 programme and in the ‘Food2030’ reflections feeding into future research programmes); some alignment of EU policies has been observed in the area of food security in the wake of the 2007-2008 food crisis64.

A strong emphasis on accountability and progress monitoring is also required, i.e. a multi-year strategy comprising benchmarks, progress indicators (including structural, process and outcome indicators), and clear allocation of responsibilities across different DGs within the European Commission, across different EU institutions, between the institutions and the Member States, and with local levels of governance. The division of responsibilities between governance levels must be dynamic and evolving, allowing problems to be addressed at the most immediate (or local) level that is consistent with their resolution.

Furthermore, a Common Food Policy must find new and creative ways to interface with food system actors, rather than mimicking/reinventing current bureaucratic structures. A wide range of local-level initiatives around Europe are already bringing different actors together around shared values and actions, through a range of strategies and fora - including ‘food policy councils’ and other horizontal decision-

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making structures. Steps are required (e.g. new funding tools, new policy delivery and implementation models, civil society capacity-building) to interface between the emerging structures and formal legislative processes at EU and national levels. These steps must accelerate the scaling out of governance models that have proven successful. A participatory mechanism introducing food democracy at EU level, for instance in the form of the "EU Food Policy Council" that has been proposed under the auspices of the European Economic and Social Committee, could be established in order to inform an integrated Common Food Policy.

**Policymakers can be convinced to support a shift towards integrated food policies as their benefits become visible.** Climate change and obesity are going to weigh increasingly on public budgets, reliance on fossil energies will be increasingly risky, and competition for resources will have geopolitical implications that, in the future, shall be impossible to ignore. It is precisely in times of crisis and budgetary austerity that we cannot afford the luxury of missed synergies, conflicting priorities, and confusing policy agendas that are only united by their focus on the short-term.

### 3. Proposals for reforming and reintegrating policies under a Common Food Policy

Beyond reforms to governance structures, a whole range of specific policy reforms would be required to spark a shift towards sustainable food systems. In this section, specific policy proposals are put forward and clustered under 11 goal-oriented headings, i.e. the **11 draft objectives of a Common Food Policy for the EU**. Policy reform and integration in these areas would constitute the first steps towards a Common Food Policy.

The proposals below emerged from collaborative work undertaken by six working groups. The **policy proposals are designed to be viable as part of a mutually-reinforcing, sequenced set of reforms (i.e. as part of a Common Food Policy)**. Policy reforms and governance reforms are two sides of the same coin: specific reforms would become politically achievable on the basis of EU-level policy parameters being reset, and new coalitions of interest being able to influence those policies.

While most proposals are focused on the EU level, some target national and local actions - reflecting the fact that an integrated food policy, while driven forward at the EU level, would ultimately need to combine and align steps on multiple levels. The rationale behind these proposals is explained in Section 4. They are not exhaustive, and do not

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draw attention to all policy tools of potential relevance. This framing paper is therefore envisaged as a first step towards the Common Food Policy vision, to be refined and further developed at the EU Food and Farming Forum and in subsequent outputs. Issues that have been under-addressed thus far and require attention at subsequent stages are listed in Annex 2.

Objective 1 (Forum Working Group 1) – Reorienting the mass retail & processing model towards a new sustainability baseline

- Monitor the effectiveness of commodity-specific sustainability regimes, including the 'Forest Risk Commodities' approach, and develop blueprint for addressing high-risk agri-food commodity imports that includes i) provisions to discriminate against specific traders/places of origin; and ii) development schemes for capacity building.
- Redefine article 101 of TFEU so that it allows horizontal agreements to guarantee price for minimum living conditions to farmers.
- Redefine Article 102 of TFEU in order to take into consideration vertical abuse of power.
- Amend EU competition rules.
- Develop new contractual forms and access to credit to incentivise longer-term contracts for farmers.
- Make environmental and social considerations mandatory in EU merger regulation.
- Improve food industry standards to account for environmental and social production/sourcing criteria (e.g. biodiversity, animal welfare).

Objective 2 (Forum Working Group 2) – Redesigning social policies to address the root causes of food insecurity and food poverty

- Introduce and pilot social and macro-economic policies with the aim to achieve sufficient income for all and reduce income and wealth inequalities. Include target groups in the elaboration and evaluation of such policies.
- Introduce schemes and strategies to facilitate dignified access to nutritious food for specific vulnerable population groups, including voucher schemes that can be used for Community Supported Agriculture and/or local farmers’ markets.
- Reform the Fund for European Aid to the Most Deprived (FEAD) so that it: Focuses on the emancipation and empowerment of socio-economically vulnerable people; Implements criteria for the quality and nutritional value of distributed foods.
- Ensure a paradigm shift in the approach to food banks and other retail initiatives such as social supermarkets: Aim to reduce by 50% the need for food banks;
Move from an approach based on offering food to the poor towards an approach that responds to the demands, needs and the aspirations of disadvantaged people; Ensure food banks are not institutionalised as a ‘solution’ to food waste; Promote the inclusion of nutritional considerations for food banks and emergency food distribution initiatives, including by cutting out ‘junk food’ from the offer.

- Ensure the Pillar of Social Rights becomes a benchmark and objective to guide macro-economic governance coordination activities under the European Semester.
- Ensure regular and complex measurement of food insecurity & research its causes.

**Objective 3 (Forum Working Group 3) – Taxing negative externalities/rewarding positive externalities**

- Introduce EU taxation that takes into consideration social and environmental externalities (like a sugar tax, but on GHG, environmental degradation, etc.)
- Tax synthetic nitrogen at significant level via EU regulation.
- Tax imported products causing deforestation via EU regulation.
- Increase tax on water via EU regulation.
- Remove VAT on direct sales.
- Develop indicators (including ‘no net loss’ biodiversity approach, climate mitigation etc.) for monitoring impacts of investments in developing countries, including under European Fund for Sustainable Development (EFSD).
- Define new proxy indicators for SDG 2.4 taking into account external impact of food consumption and shipping.
- Make life-cycle assessment mandatory.
- Target specific payments for environmental services (through CAP P1 or P2 schemes) favouring mixed crop-livestock farms and grassland systems.
- Target specific payments for environmental services (through CAP P1 or P2 schemes) favouring agro-ecological infrastructures of limited parcel size pursuing water, soil, and biodiversity quality objectives.
- Ensure research funding to: elaborate Health Impact Assessment methodologies for different parts of the food system; Define a methodology to gather data and calculate Healthy Life Years, to replace life expectancy as main overarching indicator for the state of health; Define “well-being” with associated indicators to allow it to act as a policy objective; Include a research funding stream on Healthy Sustainable Food Systems, while ensuring participatory approach in research priority framing; Build consensus on what constitutes low-risk alcohol drinking behaviour across EU countries;
• Adopt an interpretative protocol on: the EU’s legal basis to act on disease prevention; The role of Health Impact Assessment in EU policy development and implementation; The interaction between internal market and national (health) measures.
• Support the development of metrics on sustainable healthy diets (under Inter-Institutional Taskforce on Sustainable Healthy Diets)

**Objective 4 (Forum Working Group 4) – Making the health / sustainable choice the easiest**

• Promote local agroecological public procurement. Implement sustainable (e.g. in line with GHG reduction goals) and healthy public procurement policies for public institutions, especially schools and hospitals.
• Include explicit food sustainability and nutritional focus in Green Public Procurement guidelines.
• Use bilateral trade agreements to clarify and expand policy space afforded under WTO rules for social and environmental regulation, including use of public procurement to support sustainable food systems.
• Increase availability of healthy plant-based food, such as fruit and vegetables, legumes, nuts by e.g. expanding budget for the School fruit scheme.
• Develop participatory procedures for public procurement.
• Introduce an EU-wide legislative limit to industrially produced trans fats in food.
• Conceptualise, implement and enforce comprehensive childhood obesity reduction strategies, based on recommendations by the WHO Commission on Ending Childhood Obesity.
• Conceptualise, implement and enforce policies for the prevention of diet- and alcohol-related NCDs, following evidence-based policy recommendations such as the WHO ‘Best Buys’.
• Increase CAP promotion budget for fruit and vegetables.
• Use CAP voluntary coupled support for fruit and vegetables.
• Reduce maximum allowances for private cross-border movement of alcohol in the Excise Duties Directive.
• Start preparations for a follow-up to the EU Childhood Obesity Action Plan beyond 2020. Plans should include an annually updated mechanism to monitor Member States’ progress in implementing policies; a review of the effectiveness of measures implemented during the Action Plan’s period 2014-2020; establishment of EU-level entry points to implement policies and actions in the area.
• Analyse the **exposure of children to all forms of food and drink marketing** across the EU.

**Objective 5 (Forum Working Group 5) – Building new education, knowledge & extension paradigms for sustainable food systems**

• Ensure research funding to **compare sustainability of different foods and different farming methods**.
• Develop research projects and extension/AKIS (e.g. EIP) on **hardy breeds and alternative animal health management** (H2020).
• Develop research and extension/AKIS (e.g. EIP) on **legumes and N management** at farm/territory levels (CAP and H2020).
• Support **public-public partnerships** between practitioners/farming communities and research/educational organisations.
• Implement independent environmental **impact assessment of irrigation infrastructures** (via EU regulation).
• Improve **education on sustainable supply chains and farming models**: Disseminate and raise awareness on Community Supported Agriculture and introduce education on sustainable food and farming and the co-operative model in school curricula.
• Improve **education on nutrition**: Integrate healthy, sustainable nutrition into school curricula, including a system of checks against conflicts of interest in educational materials.
• Support **community meals** and similar initiatives to improve access/education.
• Establish a **European research network** to harmonise research and data gathering protocols, promote longitudinal pan-European studies and act as systematic repository of open source, comparable **data on consumption patterns and products** on the European market.

**Objective 6 (Forum Working Group 6) – Ensuring equitable access to land and sustainable land uses**

• Develop an **EU directive on fair and sustainable access to farmland**.
• Establish a transparent **European land register**.
• Carry out an impact assessment of EU policies on land use and allocation & **Assess the current status of the Governance of land in the EU** in the light of the Voluntary Guidelines on the Responsible Governance of Tenure of Land,

- Support the development of **community-led land management** (e.g. community land trusts).
- Establish **governance systems to regulate the land market** so as to: prohibit land acquisitions by institutional or large corporate foreign investors; countries regulate the buying and renting of land by their own private actors, in line with their territorial and extraterritorial obligations, and facilitate access to land and contacts between interested parties.
- Support establishment of organic/young/coop/social farming projects: **Provide incentives to sub-40 e.g. through CAP, who want to access land**, prioritising selling/leasing to young organic farmers with direct marketing concepts, and/or to new farmers/cooperative farming arrangements/pilot farm projects for education or social integration; **Assess the impact of CAP and national implementation measures on new entrants/family/ small-scale farming**.
- Develop a **directive to support succession planning**.
- Develop **national apprenticeship schemes** with planned succession.
- Introduce **tax breaks for landowners who offer urban/peri-urban land for food production** (either permanent or temporary arrangements); enforce/support development of “green belt “ around cities, with dedicated % for agricultural production.
- **Compensate the loss of farmland** (e.g. due to infrastructure projects) through the acquisition/conversion of other pieces of land into farmland.
- Ensure land is kept in the best ecological condition and the outputs from that land benefit the community; develop a **long term strategy of land acquisition & Permanent land designation as farmland**; require to report in detail about how assets are being managed and the social, environmental and economic benefits they are producing.
- Connect **housing** and **land planning** (e.g. building a housing settlement with land plots attached to them; every village should have a village farm; enable farmers to build farmhouse, while preventing over-building farmland).

**Objective 7 (Forum Working Group 7) – Incentivizing small-scale production, cooperative models & short supply chains**

- **Upgrade health, phytosanitary and quality legislation to cater for the specific constraints of small producers and agroecological production.** Redefinition of Regulation (EC) No 852/2004; 853/2004; 854/2004 concerning responsibility, liability, traceability and the food safety rules (Food Hygiene Package).
• **Cap on subsidies**, increase support to **rural development** measures (CAP).
• **Decouple CAP payments from area** (hectares) and link to labour units/ha.
• Generalize the “surprime” for **small farms** for the distribution of CAP subsidies.
• **Improve capitalization/funding for smallholders and co-operatives**, which provide a wide range of services and innovative financial products, microfinance, special lines of credit, start-up capital, and insurance.
• Support and develop **infrastructures for small-scale farming**: irrigation, small-scale centers for processing and packaging facilities (coops and collective processing facilities), infrastructures for agro-ecological farming practices.
• **Coordinate local authorities through “food” networks/platforms** - with civil society/NGOs, recognising the know-how that alternative food systems have gained through decades of experience and experimentations.
• Support **genuine local farmers markets** for food access and affordability.
• Review cohesion policy funding: **Allocate financing under EU Cohesion Fund, European Regional Development Fund (ERDF) and the European Social Fund (ESF) to support local and territorial strategies** for access to quality, healthy, sustainable diets for all, with special attention to those living in poverty and in food deserts.
• **Redefine Protected Geographical Indications (PGI) and Protected Denominations of Origin (PDO) schemes**, so as to: i) ensure the effective protection of the common cultural heritage, and avoid the monopolisation of the schemes by only a few; ii) make the bureaucratic burden for PDOs commensurate for small food artisans.
• Ensure that the **inclusion of commercial interests** is not a mandatory component in applications to EU research funds.

**Objective 8 (Forum Working Group 8) – Moving towards chemical-free supply chains**

• Ensure **research funding** to research cocktail effect of chemicals.
• Audit the **EU pesticide homologation process** in order to reveal its weakness and failures.
• Include **health objectives in the CAP**, such as those related to antibiotics use reduction, air quality, nutrition (in particular relating to fruit and vegetables) and pesticide use reduction.
• **Revise upward key pieces of food safety legislation**, including the Food Contact Materials Regulation and the Contaminants Regulation.
• Revise the Food Contact Materials Regulation to: Include **criteria for Endocrine Disrupting Chemicals (EDs)**; Ensure coherence with the REACH Regulation; Improve traceability, enforcement and controls; Include an approach for non-harmonised materials.
• Ensure through the Veterinary Medicines and Medicated Feed Regulations the obligation to **phase out the preventative use in food producing animals of antibiotics** critical in human medicine; Phase out the routine prophylactic use of antibiotics in groups of entirely healthy animals; Phase out the routine metaphylactic use of antibiotics.

• **Ensure reduction of antibiotic use as a CAP objective**, including the obligation for Member States to set national antibiotics use reduction targets.

• Include **nitrates and soil under CAP**.

• Cap the overall CAP payments/labour unit and **stop funding investments aimed at managing pollutions** (e.g. large methane/sewage plants).

• **Reduce plastic use** in the food chain.

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**Objective 9 (Forum Working Group 9) – Ending dumping & supporting transition in developing countries**

• Earmark a given percentage of funding under **European Fund for Sustainable Development (External Investment Plan)** for agroecology.

• Create a ‘Just Transition Fund’ drawing on elements of development aid, External Investment Plan (EIP) investments, climate financing and resources levied under anti-dumping procedures; **Redistribute funds levied for social/environmental dumping** on EU market to assist developing countries in meeting higher standards.

• Promote **territorial markets in developing countries** through EU development policies.

• Work with food importing countries to develop **roadmaps for sequenced shifts to rebuild food production capacity and food security**, e.g. in remit of EPA implementation.

• Promote bilateral agreements that emphasize **social economy and fair trade principles**; Clarify scope for EU member states to undertake such bilateral agreements.

• Include explicit commitments to **promote agricultural diversification in all Free Trade Agreements (FTAs)** and Economic Partnership Agreements (EPAs), alongside indicators to monitor progress.

• Make unilateral commitment (applying retroactively to all trade agreements) for EU **not to avail itself of maximum available trade protections** when developing countries are engaged in reform process; ensure **no provisions are included in trade deals that could limit the scope of policy-making**, such as investor protection or regulatory cooperation.

• Elaborate and introduce a **UN Framework Convention on the Right to Food**, which takes a holistic, rights-based approach to nutrition and contains actionable
objectives; Include the 'right to development' as an explicit starting point for trade agreements.

- **Reform Sustainability Impact Assessments (SIAs)** for trade agreements to: i) introduce a clear definition of sustainability, including health and nutrition dimensions; ii) perform assessments in time to influence the negotiations of agreements; iii) perform assessments on a regular basis, allowing for corrective measures to be taken; iv) use participatory methods allowing involvement of a variety of stakeholders; and v) avoid equilibrium models assuming full employment as the starting point.

- Conduct **Health Impact Assessment of trade agreements** with special focus on health inequalities and right to food, and reviewing impacts of food service sector liberalization via EU trade, development and investment policies on diets and nutrition, and ensuring no provisions negatively affect consumer protection or food safety; implement Policy Coherence for Development approach to ensure that external action, including trade policies, product promotion measures (CAP) and production incentives do not contribute to the proliferation of diet- and alcohol-related NCDs worldwide.

- Draw up a **contemporary definition of dumping** that includes explicit social and environmental dumping criteria, and encompasses all goods marketed below the cost of production.

- Create a publicly-available **rolling register of at-risk products & complaints re dumping**.

- Establish a **complaints mechanism** based on the precedent of illegal fishing rules (IUU) that can be activated by NGOs/unions/agrieved individuals i) to challenge the failure to comply with conditionalities on EU agri-food imports; and ii) to denounce the negative impacts in the receiving countries of EU exports.

- Shift the **burden of proof onto importing companies** to show absence of dumping when complaints mechanism is activated regarding their activities.

- **Extend the remit of the standing rapporteur** on Policy Coherence for Development to trade and anti-dumping (currently EU - European Parliament).

- Apply **Sustainability Impact Assessments** to trade policies prior to introduction (e.g. export refunds) as well as trade agreements.

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### Objective 10 (Forum Working Group 10) – Towards a sustainable meat-fish-feed-protein nexus

- Target CAP payments for **ambitious crop rotations with a minimum share of legumes**.

- Ensure the CAP becomes a **results-oriented policy**, with measurable objectives, concrete targets, and with funding linked to performance.
• Less and better meat, by e.g. **limiting coupled voluntary support to pasture-based animal farming;** promoting organic; removing historical entitlements; pursuing ammonia emissions reduction objectives.
• Improve **animal welfare** directives / policies.
• Promote **extensive livestock systems (CAP).**
• Research & develop models for **sustainable aquaculture.**

**Objective 11 (Forum Working Group 11) – Democratizing priority-setting & Building the foundations for integrated, multi-level, participatory policy-making**

• Include explicit reference to **internationally agreed standards** in investment treaties / investment chapters of trade agreements.
• Include a research funding stream on Healthy Sustainable Food Systems, while ensuring **participatory approach in research priority framing.**
• **Reform the European Food Safety Authority (EFSA)** to increase transparency of scientific assessments.
• Build **capacity of national civil society organisations** on sustainable health diets and food systems policy.
• Ensure research funding for **policy implementation research**, and elaborate new models for policy evaluation.
• Ensure that EU delegations participating in international forums, including **Codex Alimentarius, Committee on World Food Security, World Trade Organisation (WTO)** promote balanced positions consistent with the pursuit of a high level of human health, consumer and environmental protection. Create a ‘**one-stop-shop’ online portal** to follow the composition of delegations and their interventions at such forums to increase transparency and accountability.
• **Increase representation of trade unions, CSOs and social movements** in political dialogue pillar of European Fund for Sustainable Development under EIP.
• Establish a ‘**Food Policy Team**’ under the **European Strategic Policy Centre (EPSC)** to work in coordination with European Economic and Social Committee (EESC) and other experts on elaborating a transition road-map towards a food systems policy based on the right to food and right to health as per the International Covenant on Economic, Social and Cultural Rights.
• **Simplify access to EU cohesion policy funding** for small municipalities, and earmark funds for inclusive, multi-stakeholder municipal food councils.
• Put the implementation of the **Sustainable Development Goals (SDGS) and human rights** at the heart of EU policy-making, relying on the **EU Multi-Stakeholder Platform on SDGs** as one source of input.
• Establish a legal advice service, in liaison with WHO Europe, to provide on-demand legal advice to Member States in drafting health prevention and
promotion policies and strategies; Ensure effective support for national policies, including through strategic use of the EU Steering Group on Promotion and Prevention, with the aim to achieve the vision and targets in the Action plan for the prevention and control of NCDs in the WHO European Region 2016.

- Adopt and implement procedural rules on dealings with non-state actors, including commercial interests, in all areas of food policy-making.

4. Leverage points for reforming and re-integrating policies under a Common Food Policy

In this section, key leverage points or opportunities are identified where policies can be reformed and realigned with major impact; these leverage points underpin the proposals in Section 3. For each leverage point, the discussion considers what the EU currently does in this area, what promising initiatives are already emerging on this front, and on what basis action could be enhanced. The leverage points for reform are grouped under five headings, corresponding to the collaborative working groups formed to draft the framing paper:

1. Delivering sustainable healthy diets for all;
2. Rebuilding agro-ecosystems, increasing resource efficiency and circularity, and addressing climate change;
3. Harnessing the potential of urban food policies, city-region planning and alternative food systems;
4. Putting trade in the service of sustainable development;
5. Building sustainable farm livelihoods and functional supply chains.

4.1. Delivering sustainable healthy diets for all

‘Sustainable healthy diets’ can provide the conceptual basis for a raft of high-impact actions to increase the sustainability of European food and farming systems, ranging from ambitious public procurement strategies to fiscal measures rewarding foods that contribute to sustainable diets (and penalizing those generating high externalities). A key innovation introduced by the ‘sustainable diet’ concept, or ‘sustainable healthy diets’ is to emphasize eating and drinking not only as food system outcomes, but also as active drivers of food system interactions - and therefore as levers for change. In other words, the sustainable diets concept emphasizes that ‘sustainable’ food production cannot exist without ‘sustainable’ consumption. It also highlights the

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66 A sixth working group looked specifically at ‘Governance, Participation and Accountability; the ideas yielded by this group have been integrated into the broader governance discussion in Section 2. See full list of working groups and participants in Annex 1.

fundamental compatibility between health and environmental goals: a properly conceived dietary transition appears to create more synergies than trade-offs between environmental and health outcomes. A clear, policy-relevant definition of sustainable diets (or sustainable healthy diets) represents a crucial anchor for a Common Food Policy, and can draw on recent scientific advances towards a common definition. For maximum impact, the sustainable diets concept would need to be sufficiently differentiated for different regions of Europe. It would also need to be tied to ‘full cost accounting’ approaches that capture externalities, and to encompass the multiple components of sustainability, as understood by different groups in society, while remaining operational (see Box 1).

Unhealthy ‘food and drink environments’ are shaping people’s choices, and a range of integrated policy reforms are required to shift the balance. Achieving (sustainable) healthy diets is often seen as a matter of individual choice, while in reality options and choices are shaped by the context to which people are exposed, i.e. the food and drink environment (see Box 1). The concept of food and drink environments emphasises how choices are made, and helps to identify entry points for demand-side policies aimed at shifting behaviours. In other words, reshaping food and drink environments is a highly relevant objective for an integrated food policy. There is no shortage of policy options in this area: the vast majority of policies and actions recommended by the WHO for improving diets or tackling alcohol harm – from marketing restrictions, to financial incentives, to labelling, to interventions in schools – are not aimed at individuals, or at regulating eating habits, but at reshaping food and drink environments. The proposals in Section 3 echo many of these recommendations.

The challenge is to sequence reforms in a way that ensures coherence between different actions, provides outcome monitoring and accountability, and builds buy-in and ownership among a wide range of actors at different policy levels. The EU’s role in this is multifaceted, as reflected in the proposals in Section 3. Firstly, EU-wide legislation can be introduced, e.g. to upgrade certain food safety standards, or to introduce legislative limits on trans-fats. Secondly, as some of the required policy measures may be better introduced at national level, the EU can support Member States by ensuring best-practice sharing, coordination of activities, and (research) funding - and in some

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cases by simply allowing space for policy experimentation by national or local authorities.

### BOX 1. Defining the transition: ‘sustainable diets’ and ‘food and drink environments’

**Sustainable diets** were defined at a 2010 FAO Symposium as “diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources”¹. Some commentators have argued for the definition to include socio-economic issues (for producers, workers, consumers and citizens), health (food safety, environmental health, antimicrobial resistance, diets, alcohol use, etc.), environment (ecosystems, biodiversity, climate, air quality etc.), social values (including ethical considerations such as animal welfare, fair trade), food quality and governance². The complexity of these broader definitions has led to concerns about practical applicability. Like ‘sustainability’ itself, the concept of sustainable diets may ultimately need to be seen not as a “static notion but a moving target”³, requiring it to be defined with regard to the policy context in question.

**Food and drink environments** refer to the “collective physical, economic, policy and sociocultural surroundings, opportunities and conditions that influence people’s food and beverage choices and nutritional status”; healthy food and drink environments have been defined as “environments in which the foods, beverages and meals that contribute to a population diet meeting national dietary guidelines are widely available, affordably priced and widely promoted”⁴. Current food and drink environments are considered to “exploit people’s biological, psychological, social, and economic vulnerabilities, making it easier for them to eat unhealthy foods”⁵.


Pursuing social justice and healthy diets are two sides of the same coin - and this understanding must guide the next generation of anti-obesity strategies. As described in the introduction, access to healthy diets in the EU is being undermined by growing socio-economic inequalities (from unequal purchasing power to unequal access to information). The promotion of sustainable healthy diets - and the broader transition to sustainable food systems - cannot occur without proactive steps to ensure social justice and access to healthy diets for all, regardless of socio-economic background.
Steps to reduce health inequalities could deliver widespread benefits, given that people of lower socio-economic status are disproportionally affected by diet-related ill-health\textsuperscript{71}.

A new generation of anti-obesity strategies - including child obesity strategies\textsuperscript{72} - can therefore be driven forward as part of an integrated food policy, with a renewed focus on tackling the social determinants of poor diets and poor health. To avoid the pitfalls of the past, these strategies would have to promote inclusive access to quality food in a way that empowers disadvantaged people rather than stigmatising them. And they should be flanked by wider social and economic policy measures aimed at eradicating poverty and reducing social inequalities. This requires efforts to rethink the food bank model and to consolidate different food assistance and anti-poverty programmes for maximum impact.

**Food industry actors decisively shape health impacts through food system practices and their influence on policymaking.** Non-communicable diseases (NCDs), which are both Europe's and the world's largest causes of death and ill-health, are driven by a limited number of underlying causes - including alcohol use, unhealthy diet, and environmental risks\textsuperscript{73}. All of these risks are mediated by economic actors. Food and drinks are marketed products; agricultural practices are a key contributor to outdoor air pollution; chemicals found in consumer products, including EDCs, are linked to business choices. Commercial determinants of health, i.e. “strategies and approaches used by the private sector to promote products and choices that are detrimental to health”\textsuperscript{74}, are therefore highly significant; addressing them head-on is likely to provide a short-cut to making progress on addressing food system health impacts. This underscores the need for governance reforms to place the public interest and public health protection at the centre of policymaking, and to increase public participation in a range of areas (including impact assessments, trade agreements, etc.).

### 4.2. Rebuilding agro-ecosystems, increasing resource efficiency and circularity, and addressing climate change

The transition to sustainable food systems requires us to move beyond ‘techno-fixes', and the narratives underpinning them\textsuperscript{75}. Rebuilding agro-ecosystems requires a redesign of food systems to reduce environmental impacts, build natural synergies,
increase resource efficiency and revive biodiversity at all scales (see Box 2). As described in Section 1, developments over the past 50 years have fundamentally undermined these functions. It is therefore essential to move from away from the current “curative” approach, i.e. environmental policies that deal with itemised problems via ‘techno-fixes’ and are conditional on maintaining, and even increasing, agricultural productivity levels\(^{76}\), in line with the EU’s supposed “exporting vocation”\(^{77}\).

**BOX 2. What are sustainable agro-ecosystems?**

The notion of agro-ecosystems captures the interdependent nature of farming and ecological systems. Sustainable agro-ecosystems entail sustainable flows of energy, nutrients, water, living organisms and other biological components (functional definition) as well as sustainable land uses, landscape structures and networks of habitats (landscape ecology/biodiversity-based definition).

While there is undoubtedly scope for technological improvements, techno-fixes - ranging from data-driven precision agriculture to methanogen vaccines for ruminants - will not suffice to fix the environmental problems in food systems. Firstly, technological approaches to environmental problems often bring about positive changes in one dimension, at the expense of stationary (or even worsening) impacts on another front, e.g. farm animal systems that lower GHG emissions may simultaneously contribute to the disappearance of permanent grasslands, whose role in maintaining biodiversity in Europe is key. Historical / empirical experiences have also shown that reliance on capital-intensive technologies reinforces intensification and concentration in farming systems, thereby entailing trade-offs with other environmental concerns and undermining the prospects of wholesale transition towards different models\(^{78}\).

**Diversifying agriculture, reconnecting crops and livestock, and closing nutrient cycles are key to rebuilding agroecosystems and addressing climate change.** As described in Section 1, European agriculture has become increasingly specialized, industrialized, intensive and concentrated, as a result of the widespread adoption of productivist strategies\(^{79}\). While these evolutions have undoubtedly boosted food security in the EU, and boosted income at least initially for some farms, they have also contributed to the emergence of new challenges:

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\(^{76}\) Freibauer et al., 2011.

\(^{77}\) The EU is in fact a net importer of agricultural area (see Section 1).


\(^{79}\) Productivist approaches refer to “a commitment to an intensive, industrially driven and expansionist agriculture with state support based primarily on output and increased productivity. The concern [of productivism] was for ‘modernization’ of the ‘national farm’, as seen through the lens of increased production”. Wilson G.A., 2001. From productivism to post-productivism... and back again? Exploring the (un)changed natural and mental landscapes of European agriculture. Transactions of the institute of British Geographers, 26 (1), 77-102.
A progressive – yet now radical – disconnection between cropping systems and farm animal systems has occurred functionally and geographically. Most farms and many regions are now specialized either in crops or animal production. From 2011-2015, 58% of all grain produced in the EU was used for animal feed; in parallel, the level of protein-rich feed imports increased by more than 150% from 1980-2010, helping to drive deforestation and major environmental consequences in third countries. These evolutions have relied on an increased mobilization of synthetic inputs, i.e. pesticides and fertilizers. Nutrient cycles have been opened at the global scale, with impacts on land and water use, biodiversity and climate change; pesticides are driving severe environmental and health impacts (see Section 1). In several intensive cropping regions, water use by agriculture is unsustainable and/or land use is exacerbating the impacts of climate change (floods, loss of buffer zones).

Over-specialization and feed import dependency has gone hand in hand with an unprecedented increase in the total number of farmed animals, especially granivores. This has implications for localized nitrogen emissions, as well as for human health (via over-consumption of meat).

**Disconnects are occurring at the scale of whole landscapes and regions- and must be addressed via redesign across agricultural systems and along the chain.** The impacts of ultra-specialized, intensive systems can be partly addressed - and different practices incentivized - by adopting missing pieces of environmental legislation (e.g. on nitrates and soils). However, to spark a wholesale transition, measures will also be needed to close nutrient cycles and rebalance production territorially (e.g. incentives for small-scale and extensive livestock production), as well as incentives for delivering ecosystem services. Research and extension policies will also need to be fundamentally reoriented around meeting the needs of this transition (e.g. by refocusing on legumes and nitrogen management at the farm/territorial levels, and by promoting antibiotic-free livestock management). Agricultural subsidies can be redesigned to reward and incentivize production systems that rebuild ecosystems and provide multiple benefits for the planet and for people. The consumption habits which have evolved alongside the current farming model (e.g. high meat consumption) also need to shift. An integrated food policy provides the opportunity to discard the assumptions underpinning current agricultural/environmental policies. A coherent intervention logic can be developed to reward positive externalities / tax negative externalities fairly along the chain - ensuring that the costs of transition to sustainable practices do not fall on farmers alone.

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4.3. Harnessing the potential of urban food policies, city-region planning and alternative food systems

While urbanization has exacerbated sustainability challenges, cities are helping to find the solutions via citizen-based initiatives that reconstruct proximity and forge equal relationships along the chain. Cities are playing a central role in the establishment and consolidation of alternative food system (AFS) initiatives that promote sustainable and democratic alternatives to current food systems. Though these initiatives are locally-focused, they can have wide-ranging impacts in terms of delivering public goods, e.g. by maintaining local culture or ecosystems, and by supporting rural development and farm incomes. AFS initiatives tend to emphasise cooperation and community involvement, encouraging people to become active food citizens, bridging the gap between urban and rural areas, as well as between different supply chain actors, and stimulating processes of local democracy and new governance models.

Cities and other local authorities have major potential to address food challenges holistically on a territorial scale. Steps towards more integrated territorial/urban-rural planning are crucial in light of the threat that poorly-managed urban expansion poses to farming systems, rural communities and infrastructures (see Section 1). Cities can take - and are increasingly taking - significant steps to address these challenges and become drivers of food system sustainability, drawing on a variety of policy levers, e.g. by managing land in ways that reserve green space and agricultural plots in urban and peri-urban areas; by using public food procurement policies to influence the organization of food supply and distribution; and by reforming the organic/inorganic waste services that are managed at city level.

84 Morgan, K., 2009. Feeding the City: The Challenge of Urban Food Planning, International Planning Studies, 14(4), 341-348; Pothukuchi, K., & L. Kaufman, J., 1999. Placing the food system on the urban agenda: The role of municipal institutions in food systems planning. Agriculture and Human Values, 16(2); p. 213
There is a newfound willingness to use these levers to address food system challenges comprehensively at city/local level. These initiatives take various shapes and forms, from municipal or regionally-driven food strategies, to collaborative initiatives between state and civil-society (including farming groups), and wholly civil society-based alternative food movements. Often, these initiatives have aimed at integrating aspects linked to food safety, food security, public health, social justice, territorial planning, water resources, waste management, education, and, crucially, urban/rural regeneration. They have also opened a promising space for promoting relocalized/territorial food supply chains as a means of building new power relations, realigning consumption with production capacity, using resources more efficiently (particularly regarding animal production) and promoting fair trading practices. A range of cities are now looking to rebuild production and processing capacity in their hinterland and are systemically using public procurement schemes to support local sustainable production (see Box 3).

However, challenges remain, requiring deeper policy integration. Improving the opportunities for local stakeholders and regional food networks to better process, transport, distribute or sell agricultural products to urban areas is essential. Furthermore, in many parts of Europe, food supply chains do not correspond to the administrative territories of (large) city regions. Urban-rural linkages running in the other direction also require attention - in particular the need to address urban soil/land management and to reform city waste disposal systems to make reuse of nutrients for agriculture possible. As territorial food system initiatives are taken forward, it is therefore necessary to consider these challenges, and to develop flexible approaches whereby food basins (or foodsheds) combine local and long-distance sourcing, avoiding extractive urban-rural relations vis a vis local and remote rural areas, and creating urban-rural linkages at different geographic scales.

An appropriate multi-level regulatory framework is required for local initiatives to flourish. As described in Section 2, fragmentation of food systems governance leads to conflicting policy objectives and missed synergies - including between different governance levels. Ultimately, transition requires different levels of intervention (micro, meso and macro). Urban foodscapes are shaped by policies at various governance levels, as well as by major international retailers and markets. This is particularly visible in regard to AFS/local food initiatives. Regulation (EU) No 1305/13 on Pillar 2 of the CAP encourages member states to consider short and local supply chains as a means to promote economically-, socially- and environmentally-viable rural development, and the LEADER programme under Pillar 2 offers a blueprint for supporting bottom-up local

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initiatives. However, EU policies remain insufficiently tailored to the scale and nature of alternative/urban food systems actors. For example, urban-based alternative food system initiatives are usually too small and diffuse to be eligible for CAP funding (Pillar 1) and are not rural by definition (Pillar 2 funding). Meanwhile, regulatory frameworks, e.g. for hygiene and food safety, are often ill-adapted to the needs and constraints of micro-enterprises and consumer co-operatives. Furthermore, doubts remain about how to harness EU support schemes (e.g. LEADER) without reproducing existing power dynamics at the local scale. Policy realignment is therefore essential, with particular emphasis on the complementary roles the EU, individual member states, sub-national authorities and civil society actors can play in supporting urban-driven AFS.

Sharing best practices and building vocal advocacy around urban food initiatives can accelerate change. In October 2015, some one hundred world cities signed the Milan Urban Food Policy Pact (MUFPP), committing themselves to building sustainable

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**BOX 3. Examples territorial supply chain and relocalization initiatives around Europe**

The city of **Valencia (Spain)** incentivizes young farmers to produce organic food on the city's agricultural land; similarly, in **Rennes (France)**, a common agricultural plan for the city and the surrounding areas has been developed, aiming to rebuild local food production capacity and strengthen rural-urban relations.

The City of **Montpellier (France)**, owner of a wholesale market, has created a “food hub” to foster local organic food production and support small-scale processing.

In the **Drôme valley (France)**, the Biovallée program supports multi-actor initiatives related to farming practices, public food procurement, access to land, research and experimentation, alternative supply chain structuring and education.

The food procurement services of the Municipality of **Milan (Italy)** prioritizes local and Fair Trade products in its public tenders, focusing also on children's educational activities for sustainability, waste prevention and socio-cultural integration.

A “patti di filiera” - a supply chains pact to guarantee mutual support - has been developed around bread in the region of **Turin (Italy)**, connecting the producers of traditional and ancient varieties with a cooperative-owned mill and a cooperative bakery.

The five-year **Brussels Good Food Strategy (Belgium)** includes the development of local food production (Brussels and its periphery) under ecological and innovative approaches, and the achievement of 30% autonomy in fruits and vegetables by 2035 among its objectives.

The city of **Freiburg im Breisgau (Germany)** recently undertook a "cantine congress" to raise awareness among stakeholders from administration, gastronomy, farming and processing enterprises regarding local and sustainably produced food for public procurement, providing a space for exchange regarding the space for local sourcing vis a vis EU regulations.
urban food systems. Local authorities are also federating within national and international networks such as the ‘Sustainable Food Cities’ network (UK), Réseau national pour des projets alimentaires territoriaux (France), “Red de Ciudades por la Agroecología” (Spain), RUAF Foundation, Cities in Transition, Eating City, International Council for Local Environmental Initiatives (ICLEI), Sustainable Food Planning Group of the European School Planning Association (AESOP), etc. These networks have facilitated the sharing of best practices, establishing repositories to support urban and territorial food policy reform. They have also allowed cities to make their voices heard in the food and farming debates at other levels of governance (e.g. CAP reform) where decisions are made that affect urban food systems.

4.4. Putting trade in the service of sustainable development

The EU’s agri-trade policies continue to be focused on expanding trade volumes as a goal in of itself - leading to contradictions and conflicts with other policy goals. The EU has taken significant steps towards promoting sustainable development via trade (see Box 4). However, contradictions between export orientation and climate/development goals remain - in particular, the commitments to promoting sustainable production and consumption under the SDGs, and to mitigate climate change under the Paris agreement.

Furthermore, it is unclear how specific EU agri-trade objectives to expand sales of alcohol, meats and cheeses in Asia and other growing markets can be reconciled with broader commitments to promote (environmentally and socially) sustainable development. The assumption that trade liberalization automatically leads to sustainable development is increasingly being called into question, including by the European Commission. Trade liberalization can promote sustainability, by linking producers to new markets (e.g. for organics), by encouraging technology transfer, and by allowing for a more efficient use of resources based on comparative advantages. However, various studies show that the ‘scale effects’ of increased trade volumes

88 These contradictions are visible even in terms of the targets established for meeting development goals: targets 17.10-17.12 of the SDGs use increased trade volumes as indicators of sustainable development.
89 “We expect the EU to supply 30 % of the increase in world import demand for whole milk powder, skimmed milk powder, cheese and butter. Including whey powder and fresh dairy products, EU exports are expected to grow on average by around 500 000 t of milk equivalent per year, mainly in cheese and skimmed milk powder.” EU Agricultural Outlook for the Agricultural Markets and Income, 2017-2030, European Commission. Retrieved from: https://ec.europa.eu/agriculture/sites/agriculture/files/markets-and-prices/medium-term-outlook/2017/2017-fullrep_en.pdf
90 “The extent to which poverty responds to economic growth depends on how income is distributed and whether this distribution changes as the economy grows [...] While trade openness is associated with higher levels of poverty in some countries, the effects are reversed in countries with higher levels of education, better institutional environments and a more developed financial sector”. Source: Independent study commissioned by Devco entitled “Assessment of economic benefits generated by the EU Trade Regimes towards developing countries”, commissioned by the Policy and Coherence Unit of the Directorate General for Development Policy and International Cooperation (DEVCO).
91 Charveriat, C., Forthcoming. Ending hunger and malnutrition within planetary boundaries: Can policies affecting trade and markets help achieve SDG 2.4?
significantly outweigh the more benevolent 'technology effects': trade encourages higher levels of overall consumption, by presenting consumers with a cornucopia of goods that are cheap, disposable, and have an increasingly short life span\textsuperscript{92}.

**BOX 4. EU commitments to making trade work for sustainable development**

- The EU’s commitment to ‘Policy Coherence for Development (PCD)’ (Art. 208(1) of the Treaty on the Functioning of the European Union) pledges to take account of development objectives in all policies likely to affect developing countries.
- The 2015 ‘Trade for All’ Communication (European Commission, COM(2015) 497 final Trade for All: Towards a more Responsible Trade and Investment Policy) underlines the EU’s responsibilities as the world’s largest importer and exporter, expressing a ‘pro-development stance’ and pledging to promote fair and ethical trade schemes, responsible supply chain management, and market opportunities for small producers.
- The European Consensus on Development (European Commission, Communication COM (2016) 740 final ‘Proposal for a new European Consensus on Development Our World, our Dignity, our Future’) underlines the goal to promote trade as a key driver of growth and poverty reduction, and pledges to use trade as a tool to meet the SDGs
- **Sustainability criteria** have been written into FTAs, and are currently being reviewed.
- The EU "Generalized Scheme of Preferences Plus" (GSP+) provides preferential market access for countries that implement international conventions relating to human and labour rights, environmental protection and good governance.

Over-specialization has left developing countries vulnerable to market volatility, low-wage traps and environmental degradation - and EU policies have failed to address these risks. The severe environmental problems associated with over-specialized, industrial commodity production are described in Sections 1 and 4.2. Commodity specialization also drives socio-economic risks. Low-income countries relying most heavily on a narrow range of agricultural commodity exports have been negatively affected by declining prices for tropical products (coffee, cocoa, tea, bananas etc.), making it more difficult for them to afford the staple foods they no longer produce, and to import processed foods they have come to rely upon\textsuperscript{93}. EU trade and development policies have singularly failed to address these risks, and may exacerbate them. For example, the recently-signed Free Trade Agreement (FTA) with Vietnam has been criticized for reinforcing specialization in low-wage, cheap goods, and in particular

\textsuperscript{92} De Schutter, O., 2015. Trade in the service of sustainable development: Linking trade to labour rights and environmental standards. Bloomsbury Publishing.

its potential to adversely affect women\textsuperscript{94}. Furthermore, flows of EU development aid and Foreign Direct Investment (FDI), have failed to prioritize steps away from commodity specialization. For example, the ‘Sustainable Agriculture’ investment window of the European Fund For Sustainable Development (EFSD) does not include any aspects of diversification or system redesign, referring only to narrowly-defined ‘climate-smart’ approaches that can be reconciled with ever-increasing production volumes\textsuperscript{95}.

**The EU must allow developing countries the ‘policy space’ to rebuild, diversify and add value to their food and farming sectors.** Different agricultural, supply chain and land use models that rebalance power must be promoted - in developing countries and in the EU (see Section 4.5). The EU can leverage a range of investment, development and trade support tools - from Aid for Trade to the European Investment Plan - to support agri-diversification and short/alternative/ regional supply chain initiatives in developing countries. ‘Policy space’ for countries to legislate (e.g. to protect the environment or vulnerable sectors of their domestic economy such as small-scale women farmers) without fear of costly sanctions must be clarified and expanded. Unilateral reassurances that the EU will not challenge potentially trade-distorting policies when put in place as part of a longer-term transition process would help to empower developing countries. Rather, the EU must support net-food-importing countries to diversify and rebuild their food production capacity as part of long-term transitions, without jeopardizing the trade flows that remain crucial for food security as those sequenced shifts occur.

**Further steps can and must be taken to put an end to all forms of dumping.** Following the phase-out of export subsidies, the direct impacts of the CAP on developing countries tend to be relatively marginal\textsuperscript{96}. However, EU agri-food exports continue to undercut developing world producers/processors in specific sectors and regions, on the back of ongoing EU policy support, persistent competitiveness gaps, and the practices of highly-concentrated agro-industries with huge price-setting power. In particular, the EU has been accused of dumping cheap dairy products onto the West African\textsuperscript{97} and Southern African\textsuperscript{98} markets, while poultry exports are also seen to be undercutting the livelihoods of African producers - and have been linked to rural poverty and out-


\textsuperscript{95} “Thus investment seeking to increase production will need to reflect these concerns by focussing on sustainable climate-smart production systems and methods as drivers of growth in the agriculture sector in parallel with improved productivity of production factors.” P.2, European Fund for Sustainable Development (EFSD) Guarantee, Investment Window - Sustainable Agriculture, Rural Entrepreneurs and Agribusiness. Retrieved from: https://ec.europa.eu/commission/sites/beta-political/files/efsd-guarantee-windows-agriculture_en_0.pdf


\textsuperscript{98} One estimate suggests that EU milk exports to the Southern African Development Community (SADC) in 2016 were subject to more than €18 million euros of subsidies, once the sum total of coupled and decoupled support (including for feed) are taken into account. See: The EU28 dumping of its dairy products to SADC in 2016, Jacques Berthelot, SOL, March 27, 2017.
migration by the Ghanaian president. Meanwhile, EU producers may be victims of *environmental and social dumping* as a result of cheap imported products (e.g. vegetable oils) entering the EU without having met the same production standards. Steps are therefore to make EU anti-dumping regulations more effective and workable, building on revised definitions that explicitly include social and environmental dumping. Redress mechanisms must be accessible to a wide range of actors, without prohibitive costs or procedures. Steps to address dumping must not ignore the constraints placed on countries by the broader agri-trade regime, as well as underlying dependencies on foreign Direct Investment ('FDI') and development aid flows - and the power imbalances underpinning them. This underlines the need to combine anti-dumping reforms with a range of steps to rebalance power in bilateral/multilateral trade negotiations and ensure ‘policy space’ for developing countries (see above).

**Action is required to strengthen sustainability clauses in FTAs and explore specific regimes for high-risk commodities imported into the EU.** Following a consultation on how to implement and enforcement of Sustainable Development provisions in FTAs, a February 2018 European Commission non-paper acknowledged a range of shortcomings in current approaches and laid out potential actions to address them, including more assertive use of dispute settlement mechanisms, stronger provisions on climate change, and the right for civil society groups to weigh in more broadly on sustainability aspects of FTAs. Many of these orientations are echoed in the proposals in Section 3, and could have major impacts should they be followed up with comprehensive action. In particular, it is crucial to call into question the European Commission's 'discretionary power' to activate existing mechanisms. Further challenges remain in terms of how to translate commitments into workable mechanisms.

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100 Palm oil imports (in food products and fuel blends) have been identified as an example of cheap products based on unsustainable supply chains being dumped on the EU market. See for example: [http://www.europarl.europa.eu/news/en/headlines/society/20170306STO65231/palm-oil-the-high-cost-of-cultivating-the-cheap-vegetable-oil](http://www.europarl.europa.eu/news/en/headlines/society/20170306STO65231/palm-oil-the-high-cost-of-cultivating-the-cheap-vegetable-oil)


103 For example, the EU has insisted on eliminating emergency export restrictions in the EU-CARIFORUM EPA, while similar flexibilities are allowed in a separate EU-Mexico agreement. See Gruni, G., 2013. Going from One Extreme to the Other: Food Security and Export Restrictions in the EU-CARIFORUM Economic Partnership Agreement. European Law Journal, 19(6), 864-883.


in trade agreements, how to distribute the burden of compliance fairly, and how to identify suitable criteria and metrics - in a context of widespread damaging trends (e.g. commodity over-specialization) in addition to more specific instances of environmental or social impact. Specific supply chains continue to present high social and environmental risks (e.g. soy, palm oil). Inspiration for a new instrument/regulation covering specific high-risk commodities, or all agri-food imports, could be drawn from emerging supply chain-based initiatives that shift the burden onto importing companies (see Box 5).

**BOX 5. Commodity-based regimes and initiatives for sustainable supply chains**

- The 2008 EU Regulation on **Illegal, Unreported and Unregulated (IUU) fishing** (Council Regulation (EC) No 1005/2008) makes imported fish conditional on a catch certification scheme, uses a flag system to open dialogue and potentially ban imports, penalizes EU nationals who breach the regulation anywhere in the world, and blacklists IUU vessels.
- The 2017 **Conflict Minerals Regulation** (Regulation (EU) 2017/821 of the European Parliament and of the Council), aims to ensure that EU importers, smelters and refiners of 4 types of conflict minerals meet international responsible sourcing standards, providing for ‘whitelisting’ responsible suppliers.
- The 2010 **Timber Regulation**, part of the **FLEGT Action Plan** (Regulation (EU) No 995/2010 of the European Parliament and of the Council), prohibits European operators from placing illegally harvested timber and products derived from illegal timber on the EU market, while supporting partner countries to meet sustainable logging requirements.
- Several member states and civil society groups are exploring steps to regulate trade and consumption of ‘**Forest Risk Commodities**’, with a view to addressing the EU's deforestation footprint.

**4.5. Building sustainable farm livelihoods and functional supply chains**

Building shared governance of supply chains and transforming them into transparent and democratic networks of distribution provides a major opportunity to improve food system outcomes and promote sustainable farm livelihoods (See Box 6). Building on the work of the EIP-AGRI Focus Group on Innovative Short Food Supply Chain Management (2015)\(^\text{106}\), a successfully functioning supply chain requires greater transparency, allowing people to know the origins of foods, how they have been produced, the share of the price paid to the producer - and at what price for people and planet. This requires producers and/or intermediaries to share information about the product and production techniques, and for people to be able to contact

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producers directly for information. Supply chain models based on solidarity and direct producer-consumer links help to facilitate these information flows (see below). Furthermore, shared governance can be fostered by co-management of logistical tools and new governance structures, which must include public authorities, civil society and agroecological and small-scale farmers (initiatives involving only conventional farmers have not led to a transformation of supply chains). Intermediaries, from seed producers to processors, would be repositioned as partners in the supply chain, working collaboratively with farmers, fishers and producers, and fully committed to sharing information on the origins of the food, the producer and the production techniques and recognised for their role in building successful supply chains.

All food system activities can be incentivized to align with the most sustainable practices via coordinated supply chain reforms at EU level. As described in Section 1, industrial food systems currently generate a series of costly ‘externalities’, e.g. environmental degradation, climate change, disturbance of ecosystems, soil degradation, water pollution, air pollution. Downstream of agriculture, excessive packaging and plastic in particular create additional cost and are fossil fuel- and water-intensive. Reforms are required to address these externalities and ensure that public money is spent on public goods, including through minimum price requirements, mandatory and voluntary labelling/certification approaches (e.g. Participatory Guarantee Schemes)\textsuperscript{107}, and the development of accounting models to gage the sustainability (in its various components) of different food system activities.

Short supply chains and cooperative models offer a key leverage point for addressing the multiple, inter-connected problems in food systems, many of which stem from concentration of power (see Sections 1-2). Community Supported Agriculture has grown into a dynamic movement that now feeds between 500,000 and 1 million Europeans, with thousands of initiatives operating and many starting every week\textsuperscript{108}. It therefore represents an important approach for creating and co-constructing food systems (across the producer/consumer divide) and building food sovereignty in Europe. Other forms of direct sales are connecting consumers to producers via open digital tools, building the transparency needed to underpin sustainable farm livelihoods. Hybrid initiatives, with the participation of both social movements, farmers and big players, also have the potential to yield positive outcomes. Furthermore, associative and cooperative organisations gathering farmers and citizens offer major potential for creating fair supply chains, fostering social learning and conducting social network

\textsuperscript{107}While food industry actors have generally supported labeling of positive product features, they have also used legal arguments to oppose mandatory disclosure of unsustainable practices, thereby limiting the ability for informed consumer choice to be a driver of sustainability. See for example Ferrando, T., 2017. ‘Corporate Governance through Certification Schemes and Eco-Labeling: The Value of Silence’, in G. Baars and A. Spicer (eds), The Corporation: A Critical, Interdisciplinary Handbook (Cambridge: Cambridge University Press, 2017), 372-382.

activities, i.e. creating the conditions for innovative governance mechanisms. Group farms offer another avenue for addressing the crises of the small-scale farming sector109.

BOX 6. What are sustainable farm livelihoods?

A holistic definition of sustainable farm livelihoods calls for attention to both process and outcome. For example, the ‘three-legged stool of food system sustainability’1 grounds sustainable livelihoods in principles of food justice, agroecology and food sovereignty, and in respecting and realizing international human rights. From this holistic perspective, sustainable farm livelihoods require farmers, fishers and labourers to be justly compensated for their work, stewardship, and knowledge, in line with the ecosystem services they provide to society. Intergenerational justice - making farming, fishing and food production professions that the next generation feels confident to continue and grow within - is another key component of sustainable livelihoods. Farm livelihoods are sustainable where they are based on agroecology as a continuous process of learning and working with traditional knowledge, scientists, and the natural environment, in a context of mutual respect for life and dignity and fundamental human rights, in line with the ILO definition of decent work2 and agricultural workers’ rights. Sustainable farm livelihoods must be grounded in a broader vision of sustainable food systems, where consumers have adequate and stable access to a diversity of culturally, and nutritionally appropriate food (food justice and the right to food); where negative impacts on the environment are minimized and regenerative processes are predominant (Nyeleni declaration3); and where consumers and producers are empowered to co-design and co-determine food systems in ongoing democratic processes (food sovereignty).


Physical infrastructures and knowledge-sharing platforms hold major potential to support short supply chains and relocation of processing/value-added activities. For example, in Austria, Sweden, Latvia and Italy, innovative mobile slaughter units have emerged in response to the rising demand for shorter supply chains and ethical and traceable protein - and are showing potential to enhance animal welfare within strict regulatory regimes. Cooperative models are also allowing farmers to access shared processing facilities and add value within short chains. New initiatives and infrastructures allowing knowledge-sharing, training and trialling of sustainable farming

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109 In France, group farms (GAECs) have existed since the 1960s and together (GAECs and EARLs introduced in 1985) constituted 24% of all farms in 2010. Under the transparency principle GAEC partners can benefit from public incentives on the same basis as individual farmers, including from CAP. See Agarwal, B., and Dorin, B., 2017. “Group farming in France: Why are some regions more conducive to cooperation than others?” GDI Working paper 2017-013, University of Manchester.
activities are also essential. Farming experiments or farm incubators enable prospective farmers to develop a life-size farming activity, in an autonomous way, during a limited time period, and in an environment designed to reduce risk-exposure. Further initiatives with the potential to promote open knowledge-sharing and experimentation include Participatory Guarantee Systems, alternative apprenticeship schemes and agroecology schools. Supporting these infrastructures and initiatives must therefore become a central plank of the transition to sustainable food systems - and a key tenet of a Common Food Policy.

Building sustainable farm livelihoods is also contingent on ensuring access to and ownership of the means of production (work, land, seeds, water, funds and credit, tools etc.). As described in Section 1, land consolidation and speculation is continuing apace in Europe. First and foremost, land consolidation and the financialization of agriculture/farmland must be tackled via regulatory reforms. Proactive steps are also required to ensure that farmers gain and maintain access to land, based on successful experimentation around Europe (see Box 7). Releasing public land for sustainable agriculture is part of the solution. Solidarity-based joint purchasing initiatives and community land trusts are also helping to secure land for sustainable small-scale food production. Once again, knowledge is a crucial leverage point - and networks are helping to pool knowledge and best practices on land.

Access to seeds remains a major issue in light of restrictive intellectual property regimes. At the national and international levels, access to genetic resources for food and agriculture (seeds, plant and animal varieties) is increasingly considered a matter of proprietary rights that can be subjected to exclusion. International treaties like the International Convention for the Protection of New Varieties of Plants (UPOV97), the Trade Related aspects of Intellectual Properties (TRIPs), TRIPS+ and the Treaty on Plant Genetic Resources for Food and Agriculture of 2004, restrict the right to save, use, exchange or sell farm-saved seeds, increasingly affecting farmers’ livelihoods, threatening biodiversity and compromising food sovereignty.

110 Farm incubators are multi-stakeholder initiatives involving various stakeholders: agricultural and rural development associations, people's education associations, business incubators, business cooperatives, agricultural institutions, local authorities, agricultural colleges, land owners etc. At the end of the time period, the prospective farmers evaluate their project to decide whether to continue their project, modify it or abandon it.

111 For example, the ‘Access to land network’ brings together grassroots organisations from across Europe to share experiences and promote access to land as the key to agroecological transition and generational renewal. Its member organisations work together to strengthen practical knowledge - on both problems and solutions - in the field of access to land for agroecological farmers. They aim to promote the emergence and consolidation of grassroots initiatives, working towards securing access to land and land stewardship, as well as fostering a broader evolution of national and EU policies and regulations on land use and management.

112 The flexibilities that should be allowed, in principle, under Article 27(3)(b) of the WTO's Agreement on Trade-related aspects of intellectual property rights (TRIPs), which provides for the possibility of WTO Members adopting sui generis systems to strike a balance between farmers' rights and plant breeders' rights, are undermined by the pressure exercised on countries to accept "TRIPS-plus" clauses in free trade agreements, as well as to join the much more restrictive regime of the International Convention for the Protection of New Varieties of Plants (UPOV 1991); the International Treaty on Plant Genetic Resources for Food and Agriculture, which entered into force in 2004, barely operates as a counter-weight to these pressures.
Policy integration across a wide range of areas and governance levels is therefore essential to promote sustainable farm livelihoods and functioning supply chains. In particular, a favourable regime for the development of short supply chains and territorial food systems would need to be created and established as a key objective of a Common Food Policy, paving the way for alignment of various policies and funding tools around this goal - including rural development, research, extension, education, public procurement and food safety policies. Current footholds can be built on. For example, EU Directives 2014/24 on public procurement and 2014/25 on procurement by entities operating in the water, energy, transport and postal services sectors may support public procurement policies that favour groups of small-scale producers. The practice of agroecological, small-scale local producers coming together to respond to tenders for the provision of school and other institutional meals is becoming increasingly widespread. Furthermore, a new paradigm for access to resources must be a crucial pillar of a Common Food Policy. Intellectual property regimes, land succession rules, zoning regulations, access to traditional fishing grounds, and the fiscal regime governing resource use, must be reformed and aligned in a way that prioritizes access to productive resources for sustainable food production.

Box 7. Local democracy and solidarity-based models of production, exchange and land use

In Coventry (UK), a recently funded project will establish a social supermarket-style food hub guided by the principles of the Coventry Food Charter (June 2017), resulting from sustained citizen dialogue and setting out a vision for addressing both emergency food crises and the development of a sustainable and secure food system (including the development of local markets and poverty alleviation). The food hub will provide low cost food to those most in need and access to subsidised fresh produce from local agroecological producers, as well as offering other support services.

In Ghent (Belgium), a Commons Transition Plan has been in operation since 2008, with 93 of the 500 mapped initiatives relating to food. For instance, Gent en Garde is a transition platform based on the demands of civil society for fair, organic, and local food and paving the way for the Urban Agriculture workshop - a working group of individuals and organizations whose mission is to create a more sustainable and healthy food ecosystem in Ghent.

Berlin's Markthalle Neun (Germany) aims to show how “different food” and “different shopping” in the city can be possible, supporting the gradual reintroduction of small-scale food trade in an area previously dominated by discounters, while re-appropriating the hall as a socio-cultural focal point for the neighbourhood, involving cooking classes and food handling activities, and providing a platform for local initiatives to address nutrition, agriculture, and the environment.

L’Atelier Paysan, a French-speaking collective of small-scale farmers, employees and agricultural development organisations, promotes farm-based inventions, collectively develops new technological solutions adapted to small-scale farming, and makes these skills and ideas widely available through courses and educational materials.
Box 7. Local democracy and solidarity-based models of production, exchange and land use (continued)

The **Cooperative du pays des Gaves (France)** is an atelier for processing meat and slaughtering poultry. It was born out of the will of local farmers and authorities to develop a tool allowing farmers to promote their products through direct sales, and today involves more than 400 farmers.

In **Scotland**, more than 1,000 hectares of land, owned by organisations such as Scottish Water and Forestry Enterprise Scotland, will be released in spring 2018, paving the way for the creation of around 50 new farms.

The **Italian citizen network “Mondeggi Bene Commune”** emerged from concerns about the sale of public land, and has worked with other groups to bring a farm on the outskirts of Florence into collective ownership. Citizens occupied and renovated the farm, and the project is now promoting the development of local supply chains, organizing sustainable agriculture training, and distributing the land to any citizen willing to farm it.

In 2008, the **Centre of Resources for Solidarity and Ethical Initiatives (CRIES7)**, an NGO whose aim is to promote social economy in **Romania**, initiated the first consumer-producer partnership and helped establish the “Association for the Support of Peasant Agriculture” (Asociatia pentru Sustinerea Agriculturii Taranesti, ASAT8). Its schemes support access to land by helping small farmers to survive or grow by providing secure and fair compensation for their work, while supporting producers to adopt ecological methods and farm their own land rather than migrating to work on large farms. Consumers can purchase land jointly with other ASAT members, thus becoming shareholders of Commons that will eventually be entrusted to a farmer.

**Local Food Nodes (Sweden)** connects local food producers to local food consumers as well as strengthening existing relationships, via an open digital tool where food producers present their food, local consumers place orders and payments between them are facilitated. Deliveries and pick up of food takes place at a predetermined place and time (called a node).

The **Solawi (Germany)** are a form of Community Supported Agriculture based on associations of farms with a group of private households. On the basis of the estimated annual costs of agricultural production, this group undertakes to pay fixed amounts in advance to the farmer(s), allowing them to pursue sustainable practices independently of market pressures, and guaranteeing customers the entire harvest as well as processed products such as bread, cheese, etc.

**REN ETA**, the **National Network of Farm incubators (Réseau National des Espaces-Test Agricoles) (France)**, bringing together associations and public bodies able to offer space and expertise for promoting farming experiments and incubator farms, with three main activities: exchanging practices and consolidating skills (through meetings and seminars, collaborative tools, training activities, publications); mentoring and expertise; research and social innovation.
Annex 1. Partners and external reviewers

More than 30 partner organizations helped to shape this framing paper and the Common Food Policy vision through a series of plenary meetings, working group meetings and written exchanges. While contributing to all sections of the paper, partners played a key role in developing the proposals in Section 3 and the corresponding thematic chapters in Section 4 under the working groups listed below.

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<th>Partners</th>
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<td>BEUC, EuroHealthnet, European Anti-Poverty Network (EAPN); IPES-Food; SAFE.</td>
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<td>2. Rebuilding agro-ecosystems, increasing resource efficiency and circularity, and addressing climate change</td>
<td>IDDRI</td>
<td>EEB; CIDSE; Friends of the Earth; Greenpeace; IEEP; IFOAM; CAWR.</td>
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<td>3. Harnessing the potential of urban food policies, city-region planning and alternative food systems</td>
<td>UNESCO Chair in World Food Systems (Montpellier SupAgro)</td>
<td>Center for Agroecology Water and Resilience (University of Coventry); Die Agronauten; Eating City; Euro Coop; IPES-Food; University of Bristol (School of Law); RIPESS; Urgenci.</td>
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<td>ActionAid, ACT Alliance, CIDSE, Fair Trade Advocacy Office, IEEP, University of Bristol (School of Law).</td>
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<td>Slow Food</td>
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<td>6. Redesigning food system governance to improve accountability, participation, and monitoring of progress</td>
<td>Center for Agroecology Water and Resilience (University of Coventry)</td>
<td>IPES-Food; FIAN; Oxfam Solidarité.</td>
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</table>
The framing paper was reviewed by the following experts:

- Elin Bergstrøm and Sudhvir Singh, EAT Foundation
- Gianluca Brunori, Pedro Cerrada-Serra, Mikelis Grivens and Dionisio Ortiz-Miranda, TRANSMANGO project
- Sibylle Bui and Tom Dedeurwaerdere, Université Catholique de Louvain, Food4Sustainability project.
- Peter De Franceschi, ICLEI
- Nora McKeon, International University College of Turin and Terra Nuova
- Ana Moragues, Cardiff University
- Jean-Marc Meynard, INRA
- Adrian Mueller, FIBL
- Kelly Parsons, City University London
- Carsten Pedersen, Masifundise
- Chiara Tornaghi, Coventry University
- Hubert Wiggering, University of Potsdam

**Annex 2. Under-addressed issues**

Partners and reviewers have noted the need for further attention to the following topics at subsequent stages of reflection:

- Fisheries and aquaculture
- Climate adaptation
- Water quality (with implications for agriculture and food preparation)