

Brussels, 5 December 2019

To: [REDACTED]
Cc: [REDACTED]
DG Commission DG SANTE Unit E1

Re: IFOAM EU input to the Farm to Fork strategy

Dear [REDACTED]

IFOAM EU welcomes that the Commission is developing a systemic farm to fork strategy on sustainable food along the whole supply chain. Indeed, the organic sector is working towards fair, environmentally conscious, and healthy food and farming systems across Europe and is hopeful that the farm to fork strategy will contribute towards achieving this goal.

During the last plenary meeting of the advisory group on the food chain and animal and plant health, we've been asked to provide our input on the farm to fork strategy and in this context we would like to highlight that IFOAM EU is eager to assist the Commission in its work on the Farm to Fork strategy in any way we can.

IFOAM EU proposes nine overarching policy areas with specific measures that aim at moving towards a fairer and more sustainable food system. These nine overarching policy areas are the following and are further developed in the annex at the end of this letter.

1. Increasing organic production and consumption in the EU
2. New genetic engineering techniques (or "new breeding techniques") do not contribute to sustainable food systems and should not be part of the farm to fork strategy
3. Towards an ambitious and environmentally friendly CAP
4. Reducing the dependency on pesticides and their risk to health and the environment
5. The Farm to Fork strategy should link to both the EU objectives on climate change mitigation and adaptation, and to the new EU biodiversity strategy
6. Taxation as a tool towards more sustainable food systems
7. Towards a research framework that supports environmentally friendly measures
8. Preserving farmland: Healthy soils are an opportunity for young farmers and society
9. A truly sustainable food system encompasses all levels

We would be grateful for a meeting with you at your earliest convenience in order to discuss these measures further and we remain at your disposal for any questions you may have.

With kind regards

[REDACTED]
[REDACTED] of IFOAM EU

Annex – IFOAM EU in depth proposals for the farm to fork strategy

Increasing organic production and consumption in the EU

- Set a target of 50% of land being managed under agroecological practices by 2050, with a specific ambitious target on organic-certified land by 2030.
- The Commission should publish a new organic action plan, given that the current organic actions plan ends in 2019. This new organic action plan should include elements mentioned *inter alia* in this section as well as in the section about pesticide use reduction of the present document.
- Remove the unnecessary legal obstacles for organic operators coming from the implementation of the new organic Regulation (EU) 2018/848 and from the alignment of this Regulation with other horizontal regulations (Plant Protection Products, Fertilisers, Food & Feed Additives, Labelling and others)
- Promote the new guidelines on green public procurement for food, catering services and vending machines and train public authorities when it comes to how they can be used.

New genetic engineering techniques (or “new breeding techniques”) do not contribute to sustainable food systems and should not be part of the farm to fork strategy

The current EU legislation on GMOs is already fit for new GMOs, and the legal situation is clear after the ruling of the ECJ on 25 July 2018¹. The focus should be on the implementation of the legislation and the development of detection methods for new genetic engineering techniques. As such, it is necessary to:

- Ensure traceability and labelling on the use of new GE techniques.
- Develop detection methods and strategies and ensure the traceability of the use of genetic engineering techniques in animal and plant production.
 - For known products: Provide detection protocols to member-states for the genome-edited products that are already on the market, that is Cibus’ SU Canola (produced through ODM) and Calyxt’s High-Oleic Soybean (produced through TALENs).
 - For unknown products: The Commission should fund a research programme to develop proof of concept of the ability to identify new genetic engineering techniques and the products developed with them. The programme should investigate, but not limit itself to:
 - Exploring detection methods & strategies based on the capabilities of genome editing that are *inter alia* Alteration of multiple, identical DNA sequences, Multiplexing (alteration of multiple, different DNA-sequences) and the alteration of protected parts of the genome (normally protected by DNA Mismatch Repair)
 - Exploring the potential of Next Generation Sequencing for simultaneous detection of (multiple) genome edited events.
- In addition, national authorities can demand documentation even if there are currently no technical tools available to detect all products. This could be a system based on sworn statements and traceability.

Towards an ambitious and environmentally friendly CAP

- 70% of the CAP money should be earmarked for environmental and climate change action across both CAP pillars.

¹ “Organisms obtained by mutagenesis are GMOs and are, in principle, subject to the obligations laid down by the GMO Directive”; available here: <https://curia.europa.eu/jcms/upload/docs/application/pdf/2018-07/cp180111en.pdf>

- Possibility to finance organic farming either through pillar II (conversion and maintenance) and through eco-schemes in pillar I. There must be an indicator on organic farming in Annex I.
- IFOAM stands for the principle that public money should be granted only to farmers delivering public goods. There is a need to shift away from direct payments and evolve towards public goods remuneration.
- When designing their national CAP strategic plan, Member States should assess their respective organic sector, how it can contribute to the CAP policy objectives, and integrate a support strategy in the national rules. Strong governance rules are needed.
- Increase the payment for young farmers which currently represents only 2% of the CAP's budget .
- Ensure the 2nd pillar Agri-environment budget is effectively targeted: areas facing natural or other specific constraints (ANCs) should not be part of the environmental ringfencing
- Organic farming should be better reflected in the CMO: improve the transparency within the agri-food supply chain and data on organic farming. A distinction shall be made between organic and non-organic agriculture in compulsory declarations in the milk sector. Regulation of supply should be possible for organic products (not only cheese, wine and ham).
- The Commission must ensure that rural development plans make the best use of relevant measures under the CAP to support the sector's sustainable development. This includes organic farming support payments to incentivise organic production, but also investments in processing and marketing to support organic food and value chain development as well as the prioritisation of agroecological knowledge transfer, advice and innovation.
- The plan's acknowledgment of organic farming's relevance across different EU funds from the Agricultural Fund for Rural Development (EAFRD) to European Maritime and Fisheries Fund (EMFF) highlights the importance of ensuring that spending priorities agreed under the Common Strategic Framework are used to support organic farming beyond 2020. The Commission must carefully monitor the implementation these support measures during the new programming period to ensure the funds are being effectively used to support the sector.

Reducing the dependency on pesticides and their risk to health and the environment

In order to face the issue of pesticide residues being basically omnipresent in the environment and therefore present in organic products, the European Commission should:

- Phase out the use of synthetic pesticides in EU agriculture, with an 80% reduction by 2030.
- Put forward concrete actions that aim at simplifying the registration of plant protection products (PPPs) suitable for organic. Ensure that appropriate and specific procedures are in place to evaluate and authorise natural substances. As such, it is crucial to define and introduce a separate category for natural substances into Regulation (EC) No 1107/2009.
- Promote further harmonisation regarding the handling of pesticide residue findings, by considering the damage that zero-tolerance would do to process-based approaches such as organic, as well as other sectors such as baby foods.
- Develop harmonised risk indicators to measure the impacts of inputs used in the agri-food chain such as pesticides, fertilisers, veterinary medicinal products as well as food and feed additives.

The Farm to Fork strategy should link to both the EU objectives on climate change mitigation and adaptation, and to the new EU biodiversity strategy

Trade-offs between climate and biodiversity must be avoided; the Strategy must offer an impulse to address the environmental impacts of food production in a systemic way. Reliance on simplistic approaches and indicators (e.g. carbon metrics) should be avoided, and priority should be given to

food system approaches that deliver benefits on many fronts (e.g. soil health, water quality, biodiversity, mitigation and adaptation).

Design a Climate and Biodiversity action plan for the agriculture and food sector by 2050, to ensure the coherence of EU food and agriculture policy with Climate action and biodiversity long-term targets. This action plan should include concrete actions on:

- 70 % of the CAP budget should be dedicated to environmental, climate, and animal welfare actions. Member States should be free to decide on the share of 1st and 2nd pillar money going to the environment and climate objectives and the weight between the pillars, as long as 70% of their total national envelope is dedicated to them.
- Reduce the ecological and social footprint of the EU's food system by supporting deforestation-free supply chains.
- Develop an EU strategy for protein crop.
- The upcoming biodiversity strategy should include objectives linked to agriculture and food production. Performant indicators should be developed, to be used in particular in the CAP.
- The EU biodiversity strategy and the possible review of the seed legislation should aim at increasing agro-biodiversity.
- Develop the concept of "carbon farming" to quantify emissions reductions and carbon removals in farms and forestry systems, and to define practices and criteria to be eligible for CAP eco-schemes. In order to avoid reductionist and simplistic approaches, the impact of farming practices and farming systems on GHG emissions and removals should not be assessed in isolation from their impacts on biodiversity, soil, water, air, energy, animal welfare and use of natural resources

Taxation as a tool towards more sustainable food systems

- Offer guidance to Member States on how to mainstream environmental considerations into fiscal and competition policies. Particularly, Member States together with the European Commission should explore the feasibility of introducing a reduced VAT for environmentally friendly products and/or an increased VAT for harmful, synthetic inputs such as plant protection products. The "polluter pays" principle should become a guiding point of reference when it comes to policies that may have an impact on the environment and people's livelihoods. It has been found² that an excise tax on plant protection products and/or synthetic fertilisers tend to have a higher impact compared to other forms of taxation when it comes to promoting pesticide-free products. It is important to note that tax policies have to be implemented in a member state's specific cultural and political context, being accompanied by awareness-raising or other campaigns to be effective.

Towards a research framework that supports environmentally friendly measures

- Clear commitments to ringfence budgets for research and innovation for agro-ecological and low input approaches are needed, as well as an increase in the support for organic food and farming in EU and national research and innovation (R&I) frameworks (e.g. Horizon Europe). This can be done by linking the percentage of funding for research and innovation in organic to the share of land. Support is needed for piloting, demonstration and registration of alternatives for critical inputs (copper, sulphur) and alternative nutrient sources as well as investments to move further towards closed nutrient cycles (e.g. improved compost treatments, biogas slurry).

² Taxation as a tool towards true cost accounting, available here: https://www.ifoam-eu.org/sites/default/files/ifoameu_final_study_on_taxation_as_a_tool_towards_true_cost_accounting.pdf

- Financially support through the R&I policy framework, projects promoting ecological approaches for climate-resilient, diversified farming systems, promoting sustainable value chains and better food systems, and providing the knowledge base for the redesign of food and agricultural policies.

Preserving farmland: Healthy soils are an opportunity for young farmers and society

- An EU-wide harmonised, annual gathering of national data on land prices and rents is currently being developed by Eurostat, unfortunately without clear timeline. Therefore, we ask for the development of a concrete timeline and actions for setting up a harmonized methodology and implementation plan of the data gathering in the Member States.
- **Establishment of a European Land Observatory³** – To monitor land markets similar to market observatories that already exist in the European Union for some special commodities such as the milk, the meat, the crops and the sugar market observatory. The collection of data on farmland concentration and land tenure would improve land accessibility as well as the health status of soils and lead to a harmonised approach on farmland in Europe.
- Long-term policy objective: **Setting up a European Framework Directive on Land and Soil** – In order to reconnect the different policies that affect farmland

A truly sustainable food system encompasses all levels

While it is important that a new regulatory framework and a well-defined governance architecture for sustainable food systems is put in place at national and EU level, it is also crucial to promote bottom-up initiatives, as highlighted in this section.

- Set up a stakeholder group for sustainable food systems at EU level and promote setting up similar stakeholder groups at the local and regional level.
- Support and facilitate the role of the local and regional level in this endeavour and therefore promote a bottom-up process in the case of sustainable food systems.
- Support local and regional authorities in building sustainable food systems at local and regional levels:
 - Set up inclusive governance systems for the definition of sustainable food systems and policies at regional and territorial levels
 - Promote the establishment of bio-districts⁴ which have proven their economic, social and cultural benefits. For instance, the Cilento biodistrict now includes 30 municipalities, 400 enterprises, 20 restaurants and 10 tourist establishments that use local organic produce and the demand keeps. Indeed, Member States should lead on national bio-district marketing activities and aim to get new areas involved in the bio-district. At the EU level, the Commission could publish a guideline detailing how to create a bio-district.
 - Promote the establishment of food policy councils at city levels which consist of stakeholders from many sectors of the food system. The main objective of a Food Policy Council is to identify and propose innovative solutions with the aim to improve local or state food systems, promoting local economic development and making food systems more environmentally sustainable and socially just.

³ This demand is also supported by a report from 2017 from the European parliament on 'The state of play of farmland concentration in the EU: how to facilitate the access to land for farmers'. (2016/2141 (INI), 2017)

⁴ A biodistrict is a geographical area where farmers, citizens, tour operators, associations and public administrations come to an agreement regarding the sustainable management of resources. This specifically results in the adoption of the organic model of production and consumption, e.g. short supply chains, organic public procurement.