



Factsheet: Contribution to the EU feedback mechanism on Sustainable Food Systems – new initiative

October 2021

The European Commission has published an Inception Impact Assessment to inform citizens and stakeholders about the Commission's plans to move EU towards development of Sustainable Food Systems aiming at allowing citizens to provide feedback on the intended initiative and to participate effectively in future consultation activities.

PAN Europe welcomes the opportunity of providing feedback. PAN Europe calls on the European Commission to proceed with the establishment of a new EU legislative framework for development of sustainable food systems ensuring that already agreed EU laws are seriously implemented and establishing a new EU legislative framework setting a clear vision and direction of travel for EU food systems.

The principle of Sustainable Food Systems

It is crucial to develop a high-level framework/umbrella law, building on option 4 with a clear vision and direction of travel for EU food systems able to drive an ambitious, just and systemic transition to environmentally-sound, fair and healthy food systems.

Such a law must take a comprehensive and cross-cutting food systems approach addressing food production, processing, distribution, and consumption, within and outside the EU, and recognise these are all parts of a complex system that must be governed holistically.

This reflection needs to include analysis of current policy frame and trade agreements need revisions, as well as ensure that each partner in the chain are held accountable.

This consultation must find alternative ways to reach out to EU's citizens

The European Commission has published an [Inception Impact Assessment \(IIA\)](#) to consult European Citizens about which EU actions are needed to develop a Sustainable Food System in Europe, proposed around four options.

In reality few citizens reply to EU consultations. For instance, despite EU citizens are concerned about EU' pesticide use (the word pesticides is often googled¹, there are more and more media reporting about pesticides etc) the recent EU consultation on pesticide use had very limited respondents from citizens. Therefore, PAN Europe proposes the European Commission to consider to applying an alternative consultation process and start asking non-bureaucratic questions encouraging more citizens to reply.

PAN Europe calls for full integrating into the IIA further reflections of the European Citizens Initiatives 1) Ban glyphosate and protect people and the environment from toxic pesticides in which 1,3 million Europeans called for a ban on glyphosate, to reform the pesticide approval procedure, and to set EU-wide mandatory reduction targets for pesticide use, and 2) Save Bees and Farmers calling for a full phase out of all pesticides in EU by 2035.

¹ <https://iopscience.iop.org/article/10.1088/1748-9326/ab9af5/meta>

Proceeding with option 4 but enlarging its scope

PAN Europe welcomes the wording in the IIA recognises that *'the Farm to Fork Strategy has announced the adoption of a horizontal framework law, so as to accelerate and facilitate the transition and ensure that food placed on the EU market increasingly become sustainable. Such an EU level intervention aims to establish new foundations for future food policies by introducing sustainability objectives and principles on the basis of an integrated food system'*

PAN Europe proposes the European Commission to proceed with option 4, including an approach where pathways are being prepared towards a pesticide free model. Doing so will be in line with the requests of the European Citizens Initiatives, first 'Ban glyphosate and protect people and the environment from toxic pesticides' and now 'Save Bees and Farmers'.

The baseline set in the IIA needs to be raised including taking account of the consequences of 'no action'

In the IIA four options are being proposed. Each of the four options must give full recognition of both the new Common Agricultural Policy, to the Farm to Fork and the Biodiversity Strategies as these by now have all been embraced by all EU institutions, and should represent and be included in the "status quo" option.

Also, each of the options need to include reflections on the costs of no-action, at least by delivering a literature overview in line with the benefit to human health for setting cut off criteria for pesticides². Finally, each of the policy options must include reflections on the road of travel, also reflections on financial support and other fiscal instruments to accompany the policy objectives.

The IIA must explicitly mention and zoom in on the needs of future generations

PAN Europe notices that this public consultation gives full recognition to the fact that actions at the EU level are justified aiming at *'making the Union food system sustainable, whilst ensuring the integrity of the single market and promote a global transition based on common objectives and sustainability criteria'*, making specific reference to EU treaty Article 43(2) Article 114, Article 168(4)(b) and Article 192(1).

PAN Europe proposes to include the UN's human right Council new condition of giving children and future generation, at large, a right to a clean, healthy and sustainable environment. In so doing, we call on each of the four policy options to include a reflection on what each one of them would mean for future generations.

Defining what is not a sustainable food system

As an integral part of the reflection of the need to develop a sustainable food system, PAN Europe calls on the IIA to include a serious reflection on what is not sustainable food systems identifying areas like calendar spraying, seed treatment, GMOs...

Food environments and planet score as the way forward

PAN Europe recalls the importance of enhancing food environments³, and for looking at the possibility of developing an EU planet score using the model already being prepared in France, with pesticides being one of the topics monitored⁴.

Address double-standards

To put an end to the ongoing externalisation of unsustainable practices and to raise global standards, PAN Europe suggests the introduction of legal provisions to align all MRL regimes

² https://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOL-JOIN_ET%282008%29408559

³ https://foodpolicycoalition.eu/wp-content/uploads/2021/10/Food-Environments-for-SFS_EU-FPC.pdf

⁴ http://itab.asso.fr/downloads/actus/itab_-_dossier_de_presse_planet-score_-_13072021.pdf

for imports (important tolerances and CXLs) on the requirements/MRLs applied at EU level. This point should apply both to environmental and health concerns.

Additionally, the European Commission should quickly turn into action its Farm to Fork commitment to ban the export of prohibited chemical inputs, including pesticides.

The importance of independent monitoring of chemical exposure

In the European Green Deal, the European Commission sets itself the objective that the EU needs to better monitor, report, prevent and remedy pollution from air, water, soil, and consumer products.

PAN Europe questions the ongoing work with industry in the development of Life Cycle Assessment (LCA) and the Product Environment Footprint (PEF) as it could lead to a situation where monitoring of environmental exposure caused by food and feed production will partly be reliant on the industry's willingness in collecting and releasing data. Such an approach should neither replace the work of public administrations nor become the backbone in future discussions on labels.

PAN Europe calls on the European Commission to develop a solid set of EU indicators to constantly monitor environmental contamination, including collecting pesticide use data while also monitoring pesticide residues in water, air, soil, bystander exposure etc. while making sure that the polluter pays principle is being applied.

Elements to be considered in all policy options

PAN Europe calls on the European Commission, to upgrade the following indicative **elements to be considered in all policy options, by integrating the part in yellow:**

- **sustainability principles and objectives, identification of solid independent EU indicators**, providing a common understanding as goals to be achieved **and identifying blocking factors**;
- **general minimum standards** to be met for foods **and inputs** - produced or placed on the Union market and related food operations, which could be linked, amongst others, to environmental and social aspects **resulting in double standards**¹⁴;
- **responsibilities** of all the food system actors across the supply chain, including middle-chain actors and taking **into account externalities**;
- **horizontal elements for sustainability analysis** in relation to regulated products in the food chain, complementing the existing 'risk analysis' principle. In this context, consideration will need to be given to (a) the envisaged relation and interaction between the sustainability analysis and the risk analysis, (b) the consequences of the sustainability analysis for a given product and (c) the body best placed to carry out such sustainability analysis; **also including establishment of a list of tools not considered sustainable such as calendar spraying, seed treatments, GMOs.**
- legitimate and proportionate the implementation of EU requirements on **sustainability for imports of food, including pesticide residues, and export of chemical inputs**, in compliance with EU international commitments, particularly in the WTO **to avoid double standards**;
- **processes to ensure synergies and mechanisms**, including obligations and incentives, to facilitate the transition towards sustainable food systems indicating the direction and steps of travel in moving towards a pesticide free model by 2035 as **highlighted in the ECI save bees and farmers**;
- **provision of information on the sustainable performance of the food (sustainable labelling)**, while ensuring consistency with other relevant EU labels (e.g. organic) and taking into account other relevant ongoing Union initiatives **with fully recognising of the concept of food environment, and rather than Product**

Environmental Footprint focusing on labels delivery of agronomic practices to be considered with a good example being the planet score;

- **minimum mandatory criteria for sustainable food procurement** in schools and public institutions;
- **governance mechanism(s)** of the Union sustainable food system, e.g. appropriate cross-sectoral coordinating mechanisms for joint actions between governments, civil society and the private sector, including with third countries;
- **actions to mitigate impacts** that the transition towards a Union sustainable food system might have on food systems' actors;
- **EU wide monitoring framework(s)** for evaluating progress towards the Union food sustainability objectives being set through clear quantitative use targets reductions and timelines accompanied by measures to ensure uptake.
- **The costs and consequences to EU citizens and the environment of no action** preparing literature overview of consequences for ex public health



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Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together consumer, public health, environmental organisations, and women's groups from across Europe. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives. For further information contact: [Henriette Christensen, henriette@pan-europe.info](mailto:Henriette.Christensen@pan-europe.info)