



Factsheet: Contribution to the EU feedback mechanism on Sustainable Food Systems – New Initiative

July 2022

The European Commission has launched a public consultation on the idea of the EU developing a law paving the way towards a Sustainable Food Systems¹. The public consultations aim at allowing citizens and stakeholders to provide feedback on the intended initiative.

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 the development of sustainable food systems ensuring a new EU legislative framework setting a clear vision and direction of travel for EU food systems and as part of that set a clear EU political pathway towards a pesticide-free future.

The principle of Sustainable Food Systems

It is crucial to develop a high-level framework/umbrella law transforming the long-term vision proposed in the EU Farm to Fork Strategy into an overarching set of principles definitions, and quantitative & time-bounded objectives. Such a horizontal framework should drive an ambitious, inclusive and systemic transition to environmentally sound, fair and healthy food systems. It should contribute to a greater policy coherence between EU policies and national levels, mainstream sustainability in all food-related policies and enhance the resilience of food systems.

To that end, 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 an analysis of the current policy frame and trade agreements, as well as ensure that each partner in the chain is held accountable.

As mentioned by IDDRI² the SFS law should be *“implemented through a legislative package including both old and new subsidiary “daughter” measures/policies as well as cross-cutting coordination with existing parallel “sister” laws”*.

The SFS consultation must find alternative ways to reach out to EU citizens

The European Commission only received 230 replies when it consulted EU citizens on which EU actions are needed to develop a Sustainable Food System in Europe. This is very little compared to how often this issue is covered by media and considering how concerned citizens are about their food safety and quality, including regarding pesticides. For instance, a Swiss study shows how increased googling of the word pesticides has happened since 2017, and

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-new-initiative/public-consultation_en

² <https://think2030.eu/wp-content/uploads/2022/06/Think2030-DRAFT-Policy-brief-SFS.pdf>

that this was the reason why Switzerland later had no less than two petitions aiming at banning pesticides from their territories.

PAN Europe finds is concerned that this public consultation will be another public consultation to which citizens will not reply. PAN Europe call proposes the European Commission to consider applying an alternative consultation process and start asking non-bureaucratic questions encouraging more citizens to reply.

Also, PAN Europe calls on the European Commission to give full recognising of 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.

Towards pesticide-free Europe must be fully integrated into the upcoming holistic law on EU Sustainability Food System

PAN Europe welcomes that this public consultation recalls the wording from the Farm to Fork Strategy *promising 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.*

The use of pesticides in conventional agriculture must be one of the key issues that this SFS law addresses through a holistic perspective. Indeed, while these pesticides remain the primary concern of EU consumers, the presence of the most toxic of them in EU-grown food has kept increasing over the last 10 years, as highlighted in PAN Europe's latest [report](#). Consumers are now facing an omnipresence of pesticide residues, to which they keep opposing without being heard.

Therefore, PAN Europe calls on the European Commission to finally give full recognition to the European Citizens Initiatives "Ban glyphosate and protect people and the environment from toxic pesticides" and "Save Bees and Farmers!". As part of that, the holistic SFS law proposes **clear and holistic legislative pathways toward a pesticide-free model** and food chain. This will complement the recently published Sustainable Use of Pesticides Regulation (SUR) proposal.

Additionally, the SFS law should allow for a better implementation of the current pesticide regulatory framework, especially with regard to the **most hazardous pesticides** (candidates for substitution) whose use must be cut by 50% by 2030. The prerequisite for the achievement of this target is a swift revision of the [guidance document](#) on comparative assessment and substitution, which the SFS law should explicitly require³. In this way, the SFS law will allow for greater coherence between the SUR proposal, which aims at including the pesticide reduction targets in the EU legislative framework, and Regulation (EC) No. 1107/2009⁴, which provides a substitution mechanism to reduce the use of the most hazardous pesticides in the EU.

Last but not least, the SFS law must address the issue of **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 quickly align all MRL regimes for

³ Cf. [Manifesto_EN_Final.pdf \(pan-europe.info\)](#)

⁴ Cf. Article 50 and Annex IV of Regulation (EC) No. 1107/2009.

imports (important tolerances and CXLs) on the requirements/MRLs applied at the EU level. This point should apply both to environmental and health concerns⁵.

Additionally, the European Commission should quickly turn into a legislative proposal its commitment under the EU Chemical Strategy for sustainability to ban the export of prohibited chemical inputs, including pesticides.

The EU SFS law must explicitly target the needs of future generations

PAN Europe calls on the European Commission to make an SFS law targeted at future generations recalling the UN's Human Rights Council's new condition of giving children and future generations, at large, a right to a clean, healthy and sustainable environment.

Defining what is not a sustainable food system

In the light of the SAPEA report⁶ stressing that bans and taxes are the most effective ways to change consumer behaviour, PAN Europe calls on the SFS law to define what is not sustainable food systems identifying explicitly these practices like calendar spraying, seed treatment, GMOs, etc. and propose pathways and policy tools on how to remove these unsustainable practices from the food chain. Also, PAN Europe calls on the SFS law to include a detailed analysis of factors and stakeholders blocking pathways towards transition towards sustainability, including pathways towards a pesticide-free future. Finally, PAN Europe calls on the SFS law to be accompanied by serious reflections on how the importance of start applying the polluter pays principle.

Food environments and planet score as the way forward

PAN Europe recalls the importance of enhancing food environments which promote sustainable products as the default choice for consumers⁷, 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 monitored⁸.

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.

⁵ See also attached, PAN Europe's contribution to the call for evidence on the application of EU health and environmental standards to imported agri-products.

⁶ <https://www.sapea.info/wp-content/uploads/sustainable-food-system-report.pdf>

⁷ https://foodpolicycoalition.eu/wp-content/uploads/2021/10/Food-Environments-for-SFS_EU-FPC.pdf

⁸ http://itab.asso.fr/downloads/actus/itab_-_dossier_de_presse_planet-score_-_13072021.pdf

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.

The baseline set in the impact assessment needs to be raised, including taking into account the consequences of “no action”

Finally, the upcoming impact assessment that will accompany the legislative proposal must give full recognition to the new Common Agricultural Policy, 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, the impact assessment needs to include long-term reflections on 1) the costs of no-action, starting by delivering a literature overview in line with the benefit to human health for setting cut-off criteria for pesticides⁹, 2) recognition of changing consumer behaviour, 3) how the transition towards agricultural practices with low-chemical inputs will over enable result soil fertility and biodiversity recovery leading to increased growth potential.

Finally, the impact assessment must include reflections on the pathways, also reflections on financial support and other financial instruments to accompany the policy objectives, and finding inspiration from studies by IDDRI¹⁰ and Foodwatch¹¹.

Pesticide Action Network (PAN Europe) is a network of NGOs working to reduce the use of hazardous pesticides and have them replaced with ecologically sound alternatives. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. Our network brings together over 45 consumer, public health and environmental organisations and women’s groups from across Europe.

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⁹ https://www.europarl.europa.eu/thinktank/en/document.html?reference=IPOL-JOIN_ET%282008%29408559

¹⁰ <https://www.iddri.org/sites/default/files/PDF/Publications/Catalogue%20Iddri/Etude/201809-ST0918EN-tyfa.pdf>

¹¹ <https://www.foodwatch.org/en/reports/2022/locked-in-pesticides-europes-dependency-on-harmful-pesticides-and-how-to-overcome-it/>