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Dear President,

The Commission would like to thank the Camera dei Deputati for its Opinion on the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions - A Farm to Fork Strategy for a fair, healthy and environmentally friendly food system {COM(2020)381 final}

This Farm to Fork Strategy, adopted on 20 May 2020, is at the heart of the European Green Deal. It addresses comprehensively the challenges of sustainable food systems and is accompanied by an Annex listing 27 initial actions, of legislative and non-legislative nature, to transform our food system.

The implementation of the strategy will enable the transition to a sustainable EU food system that safeguards food security and safety and ensures access to healthy diets sourced from a healthy planet. The Farm to Fork Strategy aims at reducing the environmental and climate footprint of the EU food system and strengthen its resilience, protecting citizens' health and ensuring the livelihoods of economic operators. In addition, the strategy calls for collective action and engagement from all actors in the food system to ensure its success. This concerns not only farmers, but also food businesses along the entire food chain and public authorities at all governance levels.

The Commission welcomes the broad support of the Camera dei Deputati for the goals of the strategy and its measures, and takes notes of the remarks made in its Opinion. A detailed response to the remarks made can be found in the annex.

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The Commission hopes that the clarifications provided in this reply address the issues raised by the Camera dei Deputati and looks forward to continuing the political dialogue in the future.

Yours sincerely,

*Maroš Šefčovič
Vice-President*

*Stella Kyriakides
Member of the Commission*

Annex

The Commission welcomes the overall support to the Farm to Fork Strategy expressed by the Commissione Agricoltura and the Commissione Politiche dell'Unione europea of the Camera dei Deputati and takes good note of their remarks. The Commission has carefully considered each of the issues raised and is pleased to offer the following clarifications:

- *Commissione Agricoltura's contribution, point a) – on the impact assessments*

All significant legislative measures in the framework of the Farm to Fork Strategy will be preceded by a thorough impact assessment and will ultimately be adopted by the European Parliament and the Council.

- *Commissione Agricoltura's contribution, point b) – on reciprocity in relations with non-EU commercial partners*

The EU Farm to Fork Strategy has confirmed that imported food must continue to comply with EU regulations and standards. The EU's sanitary and phytosanitary standards which relate to food safety, animal health and plant health, need to be respected in full by countries exporting to the EU. Any product arriving to the EU must continue to comply with EU's stringent sanitary and phytosanitary requirements.

In addition, through trade and international cooperation, bilaterally and multilaterally, the EU will drive the convergence to a global sustainable food system. The Commission will deploy all efforts to promote sustainable farming practices, reduce deforestation, enhance biodiversity, the adoption of global standards regarding sustainable food systems while ensuring a high level of protection of human, animal and plant health and improve food security and nutrition outcomes.

The strategy will also help increase consumer demand for sustainable food. This is an opportunity for farmers to sell products with higher value-added and to reinforce connection with consumers.

Finally, it should be emphasised that the proposal for the Common Agricultural Policy post-2020 included a very significant budget in support of European agriculture.

- *Commissione Agricoltura's contribution, point c) and Commissione Politiche dell'Unione europea's contribution, point a) – on the income of primary producers*

The Common Agricultural Policy will play a major role at farm level in the transition towards sustainable food systems. Income support measures through direct payments will continue to ensure income stability for European farmers, while supporting environmentally friendly farming practices (e.g. eco-schemes) which will enhance productivity and preservation of natural resources (water, soil fertility, air). At the same time, rural development support, including for the European Innovation Partnership,

will help farmers to invest in more sustainable farming, sharing good practices and filling gaps with knowledge and targeted investments that will help farmers in the transition phase.

- *Commissione Agricoltura's contribution, point d) – on supply chains*

The Common Agricultural Policy proposal for 2023-2027 foresees a number of measures that aim at enhancing cooperation activities among farmers and with other actors of the food chain, as well as for the setting up of quality schemes, collective environmental and climate actions and the promotion of short and sustainable supply chains. This is expected to contribute to a better return for farmers' products, while addressing consumers' demand for high quality products.

- *Commissione Agricoltura's contribution, point e) – on the competitiveness of livestock sectors*

The use of innovative feed additives can improve the efficiency of livestock farming, leading, among other benefits, to producing animal products with less feed material. Thus, the derived cost reduction increases EU farmers' competitiveness and the whole food chain becomes more sustainable. Furthermore, it is crucial for tangible improvements towards a sustainable food chain that the environmental impacts of the various feed sources become transparent. Therefore, the Commission is establishing a science-based environmental footprinting of animal feed supply chains, which will allow an objective quantification of the carbon footprint for different feed materials. This will enable the disclosure of the environmental performance for the various feeds and, in consequence, food of animal origin could be labelled with its environmental footprint.

In addition, under the Common Agricultural Policy proposal for 2023-2027, a new stream of funding for the environment and climate ("eco-schemes") will be available for farmers to help them in achieving the Common Agricultural Policy environmental and climate objectives. Moreover, continued support from the Common Agricultural Policy's rural development budget for environment- and climate-relevant management practices, investment, knowledge-building, innovation and cooperation will be available to increase competitiveness of the livestock sectors, while improving energy efficiency (e.g. bio-energy) and reduction of livestock emissions.

- *Commissione Agricoltura's contribution, point f) – on the discussion on interventions for the agricultural sector*

The Farm to Fork Strategy clearly recognises that no one should be left behind in the transition towards more sustainable food systems.

In this respect, the Commission will present by end 2023 a legislative proposal, accompanied by an impact assessment, for a framework law on the sustainability of food systems with the aim to promote policy coherence at EU and national level,

mainstream the three components of sustainability – environmental, social and economic – in all food-related policies and strengthen the resilience of food systems.

Moreover, the EU Code of conduct for responsible business and marketing practice is currently being prepared by all relevant stakeholders as a key contribution of the industry towards a more sustainable food system.

The Commission's proposal for the 2023-2027 Common Agricultural Policy envisages, among others, a number of provisions that will help strengthening the role of farmers in the food chain through cooperation measures, investment opportunities and knowledge transfer. In addition, the Commission is closely monitoring the transposition at national level of the Directive (EU) 2019/633 of the European Parliament and of the Council of 17 April 2019 on unfair trading practices in business-to-business relationships in the agricultural and food supply chain, which bans certain unfair trading practices, with the aim to ensure fair relations among the different actors of the food chain.

On international aspects, through its external policies, including international cooperation and trade policy, the EU will pursue the development of Green Alliances and Partnerships on sustainable food systems with all its partners in bilateral, regional and multilateral fora. The EU will seek to ensure that there is an ambitious sustainability chapter in all EU bilateral trade agreements and will propose a chapter on sustainable food system as part of ongoing negotiations and for future trade agreements. Developing countries will be supported in their transition to sustainable food systems through a partnership approach and the Commission will take into account environmental aspects when assessing requests for import tolerances for substances no longer approved in the EU, while respecting World Trade Organization standards and obligations.

- *Commissione Agricoltura's contribution, point g) – on micro, small and medium-sized enterprises*

The Commission is aware that most of the companies in the food supply chain are micro, small and medium-sized enterprises. The Common Agricultural Policy and the Common Fishery Policy remain the key tools to support the sustainability efforts of primary producers and ensure a decent living for farmers, fishers and aquaculture producers. In addition, the Commission will ensure that tailored solutions help small and medium-sized enterprises of food processors and small retail and food service operators to develop new skills and business models. The InvestEU Fund will also foster investment in the food sector by de-risking investments made in this area by European corporations through EU budget guarantees. It will facilitate access to finance for small and medium- sized enterprises and mid-cap companies.

- *Commissione Agricoltura's contribution, point h) – on supply chains*

To improve the position of farmers and small and medium-sized businesses in the food supply chain, the EU has adopted Directive (EU) 2019/633 of the European Parliament and of the Council of 17 April 2019 on unfair trading practices in business-to-business relationships in the agricultural and food supply chain, which bans certain unfair trading practices. These include (but are not limited to) late payments for perishable food products, last minute order cancellations, unilateral changes to contracts, refusal to enter into a written contract, returning unsold or wasted products and payment for buyer's marketing. The Commission is closely monitoring its transposition at national level.

- *Commissione Agricoltura's contribution, point h) – on compliance with the rules*

The recently published EU Organic Action Plan envisages a number of actions to stimulate demand and ensure consumer trust, stimulate conversion and reinforce the entire value chain, and lastly improve the contribution of organic farming to environmental sustainability. Efforts will also be made to ensure that operators in third countries are better informed on EU standards to ensure compliance with EU law, while strengthening traceability and control systems in EU and in third countries.

- *Commissione Agricoltura's contribution, point h) – on short and sustainable supply chains*

Improving the position of farmers in the food supply chain is an important objective of the future Common Agricultural Policy. In this respect, several possibilities are available under the future Common Agricultural Policy to create and maintain short and sustainable supply chains (e.g. advisory services, sharing of good practices via the operational groups of the European Innovation Partnerships, quality schemes, cooperation among supply chain actors, promotion campaigns of short and sustainable supply chains and local markets). In addition, targeted investments will continue to be available to help farmers to transform their products for the local markets.

- *Commissione Agricoltura's contribution, point k) and Commissione Politiche dell'Unione europea's contribution, point a) – on investments and resources*

Already under the Horizon 2020 Research and Innovation Framework Programme, the EU has supported over 300 projects (around EUR 2 billion) that deliver diverse innovative solutions to accelerate the transition to sustainable food systems from farm to fork. An additional European Green Deal call under Horizon 2020 has been recently published. Once the evaluation is finalised, the first selected projects will start in autumn 2021. Looking ahead, under Horizon Europe, the upcoming framework programme for 2021-2027, EUR 9 billion will be dedicated to research and innovation on food, bioeconomy, natural resources, agriculture and environment. The first work

programme has been published in June 2021¹. The highest share of resources will be dedicated to accelerate the transition to fairer, healthier and more environmentally friendly food systems from primary production to consumption. As far as the future Common Agricultural Policy is concerned, precision farming and uptake of innovative solutions at farm level are key elements of the Commission's proposal with the aim to improve management practices and the overall sustainability and resilience of EU agriculture. Several possibilities are available for farmers to address these specific aspects (e.g. eco-schemes, as well as ad-hoc investments and knowledge transfer under rural development programmes).

- *Commissione Agricoltura's contribution, point 1) – on reducing the environmental impact*

The revision of the Feed Additives Regulation (Regulation (EC) No 1831/2003 of the European Parliament and of the Council of 22 September 2003 on additives for use in animal nutrition) is one of the actions envisaged in the Farm to Fork Strategy. The revision intends, amongst others, to reduce the negative impact that livestock production has on the environment. Feed additives can provide environmental benefits, such as climate change mitigation by reduction of greenhouse gases, protection of soil and water. These can be achieved by, for example, using additives to improve the utilisation of phosphorous and nitrogen and thus reducing the potential contamination of soil through animal excrements containing those essential elements, using additives to change the feed composition and thus decreasing the quantity of manure, or reduce nutrient losses by using additives preserving the crops during storage.

Another important element to consider in sustainable farming is the well-being of animals. Feed additives may contribute to this objective by improving the physiological status of animals or by reducing stress. This can make animals more resilient in the transition to different production stages or in the event of unexpected adverse climate conditions. It will also improve the health status and reduce the use of antimicrobials, thus contributing to reduce antimicrobial resistance.

Finally, the Farm to Fork Strategy promotes a significant reduction of the dependency on critical feed materials, such as soya grown on deforested land. The Common Agricultural Policy strongly supports this action and it will foster the cultivation of sustainable feed sources in the EU, including feed from permanent pasture. The future Common Agricultural Policy will provide a number of measures that will help the livestock sector to invest in more sustainable practices, in areas such as agro-ecology (including organic farming), carbon farming, agro-forestry and precision farming. Moreover, the enhanced conditionality proposed for all beneficiaries of direct payments, as well as the agri-environment-climate interventions and other investments (for example, energy efficiency) supported under the rural development programmes

¹ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/wp-call/2021-2022/wp-9-food-bioeconomy-natural-resources-agriculture-and-environment_horizon-2021-2022_en.pdf

will be all combined in the Common Agricultural Policy Strategic Plans that are being prepared by Member States and will be approved by the Commission during the course of 2022. Furthermore, the Commission is exploring ways to support the incorporation of alternative feed materials such as insects, marine feed stocks (for example, algae), by-products from the bio-economy and former foodstuffs into the diets of the EU livestock.

- *Commissione Agricoltura's contribution, point m) – on planning at territorial level*

The Commission's proposal on the Common Agricultural Policy Strategic Plans gives considerable flexibility to Member States to provide interventions aimed at addressing regional and territorial needs, and to organise the planning and management of these programmes accordingly. The proposal also provides for the obligation to involve different levels of public authorities and other stakeholders in the design and implementation of the Common Agricultural Policy plans. The Common Agricultural Policy recommendations, recently published by the Commission, provide guidance in this respect.

It is also important to ensure complementarity and synergy between Common Agricultural Policy funds and other EU funds such as the NextGenerationEU, social and structural funds, when addressing the needs for a sustainable and resilient development at local level.

- *Commissione Agricoltura's contribution, point n) and Commissione Politiche dell'Unione europea's contribution, point b) – on coordination*

The Farm to Fork Strategy requires a collective action. The full engagement of public authorities at all governance levels is needed in order to achieve the goals of the strategy.

Consulting and interacting with all relevant stakeholders on the implementation of the strategy is also of utmost importance for the Commission, which already seeks their views through the various stakeholders' fora and expert groups covering in a specific manner most of the areas of the Farm to Fork Strategy.

- *Commissione Agricoltura's contribution, point o) and Commissione Politiche dell'Unione europea's contribution, points c)and d) – on labelling*

Improving consumer information and encouraging healthy diets are important objectives of the Farm to Fork Strategy. The Commission has announced its ambition to prepare by the end of 2022 a proposal for harmonised mandatory front-of-pack nutrition labelling at EU level to enable consumers to make healthy conscious food choices.

The Farm to Fork Strategy does not recommend any specific type of front-of-pack nutrition labelling scheme and, at this stage, no choice has been made. This choice will

be based on the results of an impact assessment, consultation of Member States and stakeholders and scientific advice.

As a first step, the Commission has launched an impact assessment on the different possible options for front-of-pack nutrition labelling. The options are based on the types of available schemes already developed in the EU and include numerical schemes such as the NutrInform Battery scheme developed by Italy.

In addition, the Commission has requested the European Food Safety Authority to provide scientific advice and the Joint Research Centre to update the previous literature review taking into account the latest scientific publications and papers.

As announced in the Commission's inception impact assessment, the possibility to apply specific conditions to certain categories of foods will be explored.

- *Commissione Agricoltura's contribution, point p) – on the origin of products*

The Farm to Fork Strategy announces a Commission proposal on the extension of mandatory origin labelling to certain products by the end of 2022. An impact assessment has been launched on the different options and extensive consultation will be carried out. In addition, the Commission has requested the Joint Research Centre to provide a literature review regarding consumers' understanding of origin information on food packages and the impacts on their purchasing behaviour

- *Commissione Agricoltura's contribution, point q) – on counterfeiting*

The Commission will scale up its fight against food fraud. The Commission will work with Member States, Europol and other bodies to use EU data on traceability and alerts to improve coordination of actions on food fraud. Stricter dissuasive measures will be proposed, as well as better import controls. In addition, the possibility of strengthening the coordination and the investigative capacities of the European Anti-Fraud Office will be examined.

- *Commissione Agricoltura's contribution, point r) – on education*

Education certainly helps achieving a sustainable food system: the Commission will review the EU school scheme to enhance its contribution to sustainable food consumption and, in particular, to strengthen educational messages on the importance of healthy nutrition, sustainable food production and reducing food waste.

- *Commissione Agricoltura's contribution, point s) – on social inequalities*

The European Green Deal maps a new, sustainable and inclusive growth strategy to boost the economy, improve people's health quality of life, care for nature, and leave no one behind. The social dimension of sustainability is a key part of the European Green Deal and the Farm to Fork Strategy. The Commission is committed to ensure food

security for all citizens. In this regard, the Farm to Fork Strategy aims at creating a food system where sustainable food choices are accessible and affordable for everyone.

The Farm to Fork Strategy is also central to the Commission's agenda to achieve the United Nations Sustainable Development Goals. The strategy recognises the need for a robust and resilient food system that ensures access to a sufficient supply of affordable, nutritious and sustainable food for all citizens. Food security and food safety are a prerequisite for the implementation of the strategy. Building on the lessons learned from the COVID-19 crisis, the Commission is working on developing a contingency plan. The contingency plan will allow the Commission to monitor the structural resilience of the food supply chain and to ensure food supply and food security also in times of crisis.

- *Commissione Agricoltura's contribution, point t) – on fisheries and aquaculture*

The importance of fisheries and aquaculture is widely acknowledged in the Farm to Fork Strategy. The Strategy calls for an accelerated shift towards sustainable fish and seafood production, particularly stressing the potential of sustainable aquaculture.

The strategy foresees a series of actions that are mentioned either in the text itself or in the accompanying action plan. Fisheries and aquaculture are covered in most of them. In this context, the strategy aims at reinforcing the fight against food fraud and enhancing traceability. It calls for a harmonised mandatory front-of-pack nutrition labelling, including the origin indication, and a sustainable food labelling framework. The objective of these labelling initiatives is to empower and enable consumers to make sustainable and health conscious food choices. Furthermore, the strategy foresees the review of marketing standards for fisheries and aquaculture products where the potential inclusion of a sustainability element is currently being assessed.

Regarding aquaculture, the Commission has already adopted the Action Plan on Organic Production, which provides for actions to promote organic aquaculture. Moreover, a key deliverable of the strategy are the new Strategic Guidelines for EU aquaculture. These have been presented on 17 May. The new guidelines provide the opportunity to address EU's renewed commitment for the sustainable development of this sector in the context of the European Green Deal agenda and related strategies. The guidelines aim at setting a vision for EU aquaculture in the years to come as a sector that is competitive, resilient and that is a reference in terms of sustainability.

Farm to Fork Actions will not only contribute to high-quality seafood products, but hopefully also contribute to fishers and aquaculture producers getting a better price for their products on the market.

- *Commissione Agricoltura's contribution, point u) – on the adoption of measures*

The Farm to Fork Strategy provides the EU and Member States with the possibility to address challenges and opportunities in the food sector in a systemic and holistic way, looking at synergies and complementarities between different policies and funds at all levels that can help the transition towards a more sustainable path.

The targets announced in the Farm to Fork Strategy are political commitments. Any proposal to make these targets legally binding will be preceded by a thorough impact assessment and will ultimately be adopted by the European Parliament and the Council. In the development of these binding targets and legislative proposals, the state of play and the efforts made over the years by Member States will be taken into account.