

1. Introduction

This is a report on the responses given to the public consultation on the 'sustainability of the food system' run over the summer 2013, launched to support policy making in this area.

The report looks at the numerical breakdown of the responses to the options presented in the consultation, outlining which groups broadly favoured which options, and then presents some of the written responses linked to these responses. The results of this consultation have been, and will continue to be, used to inform the Commission's policy development in this area. (This does not, however, mean that if a certain option is favoured by those responding to the consultation, that this is the option that will necessarily be taken up. Rather, where reasoned arguments are presented, these will be considered and taken into account in policy making.)

The aim of such a public consultation is to receive input from a wide range of interested parties in order to help inform policy making. Any numbers quoted in this report referring to the views of respondents are therefore included for descriptive purposes but are not statistically significant as such, nor representative of the views of any given group or sector. (nor is that the purpose of such a consultation).

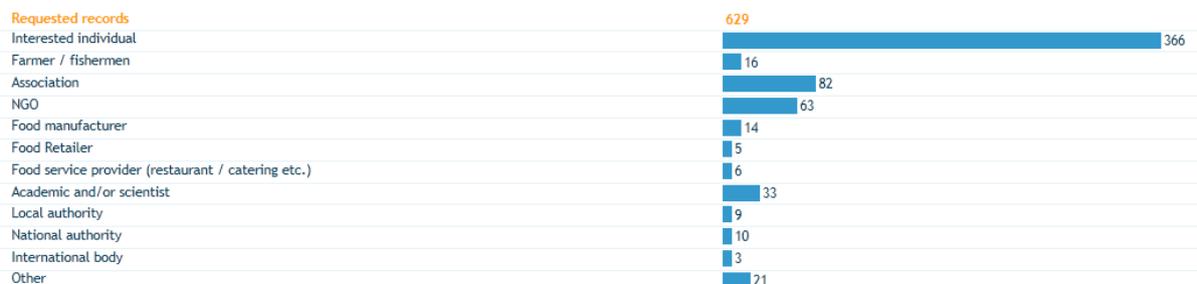
This report is only an extract/catalogue of the responses coming from the consultation, it does not represent an official Commission position. It is intended to give a digested selection of some of the reactions the key questions, and allow the reader to form their own opinions, or to use the information to inform their own thinking.

The full consultation written results are a rich source of information on food sustainability and on policy options in this area, and will be made available for any who wish to delve into them in more detail. You can find them at the following web address:

<http://ec.europa.eu/environment/eussd/food.htm>.

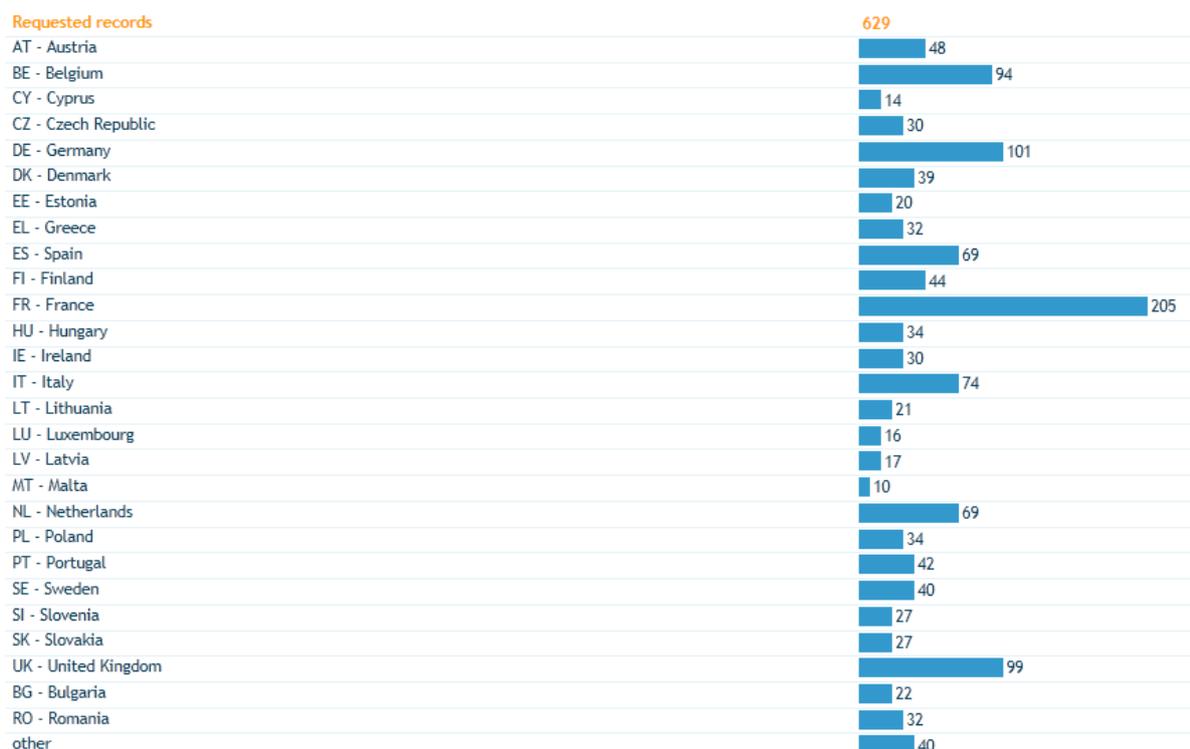
2. Responses to general questions on food system sustainability

The public consultation received 629 responses, broken down as shown in the following chart according to the options presented:



Responses came from individuals and/or organisations coming from 27 EU Member States, with a least 10 responses each. The highest number of responses came from France, (205), followed by

Germany (105), United Kingdom (99) and Belgium (94). (Note: some responses represented multiple companies/organisations representing multiple countries.)



87% of respondents considered themselves very well, or fairly well informed about the subject of sustainable production and consumption of food.

85% considered it important to have an agreed definition of sustainable food, but only 41% used a specific definition or criteria to guide their work.

A broad range of issues were considered as falling within the scope of a strategy on the sustainability of the food system, with the most frequently selected issue being biodiversity and natural habitats, at 84%. Over 70% of respondents also supported inclusion of climate change, water scarcity, toxic emission to air and water, soil degradation and food security, closely followed by fair trade and animal welfare. The least frequently selected issues were economic growth and competitiveness of the EU food sector, with less than 30% support.

Climate change	485	(77.1%)
Biodiversity and natural habitats	528	(83.9%)
Water scarcity	517	(82.2%)
Toxic emission to air and water (nitrogen / phosphorus)	511	(81.2%)
Soil degradation	514	(81.7%)
Food security (which means a combination of 'food availability' - having available sufficient quantities of food on a consistent basis, and 'food access' - having sufficient resources, both economic and physical, to obtain the appropriate foods for a nutritious diet.)	491	(78.1%)
Food price stability / impact of excessive food price volatility	374	(59.5%)
Employment	313	(49.8%)
Economic growth	164	(26.1%)
Competitiveness of the EU food sector	185	(29.4%)
Obesity and related chronic diseases prevention	334	(53.1%)
Malnutrition and under-nutrition	365	(58%)
Animal welfare	425	(67.6%)
Fair trade	438	(69.6%)
Other	133	(21.1%)

This pattern was broadly speaking consistent across those groups responding, although professional associations placed competitiveness of the EU food sector much higher in their rankings, only just

behind the top environmental issues in terms of importance, and placed health issues as the least relevant.

Highlights coming from the written comments on what 'food sustainability' really means:

Almost all respondents consider a sustainable food system to be one that includes consideration of environmental and social issues, with most, but not all, also considering economic and employment factors to also be part of a 'sustainable' system. The precise balance and priority that should be given to these factors varied, as can be seen by the responses below:

UNEP offered a simple definition of a sustainable food system as: *"...systems that enable the production of sufficient, nutritious food in an affordable way while conserving the natural resources and ecosystems that food systems depend on and lowering its environmental impacts."*

Barilla state simply their motto: *"Good for You, Good for the Planet"*

Copa-Cogeca stressed that: *"...any definition addressing sustainability needs to cover its 3 pillars: social, economic and environmental. In addition we give a strong emphasis to the viability of the agricultural sector in view of assuring food security today and in future with emphasis on safe, nutritious food of good quality with low environmental impact."* This was a sentiment shared by many respondees.

The European Public Health Alliance summed up the argument against considering economic growth and competitiveness in the definition of sustainable food: *"The European Commission's list of items identified to (possibly) fall within the scope of a strategy on the sustainable food system is quite extensive and we do consider all of them to be explored – except for 'competitiveness of the EU food sector' and 'economic growth'. We do not see place for a drive towards greater competition and growth measured in GDP-terms in a strategy for sustainable food system because it is unsustainable, unrealistic and irresponsible to pursue endless growth on a finite planet with finite natural resources. Far too often competitiveness is a substitution practice for 'cheap' food production through externalised long-term social and health costs."*

By contrast the Tesco producer network felt that economic sustainability should be a priority: *"Our producers also say that the focus should lie with economic sustainability and food security: food price stability or the avoidance of price volatility."*

FoodDrinkEurope propose a different focus: *"Rather than agreeing on a single definition, we understand that what matters is improving understanding of the impacts of production and consumption, driving resource efficiency across the value chain and investing in the skills and knowledge required to address the resulting challenges of producing more, from less and with less environmental impact. "*

Unilever provide a perspective on diets in relation to sustainability: *"Unilever believes that it is important to consider the sustainability of food within the broader and holistic context of sustainable diets. The sustainable diets concept acknowledges the plurality of diets and recognizes that there is no such thing as a single sustainable diet. Furthermore it emphasizes*

that is not sufficient to consider only the sustainable production of individual food items/products and that it is important to take an aggregate perspective that encompasses both food production and human well-being."

The 'Keep Britain Tidy' campaign support joined-up approaches: *"...we raise awareness around how the environmental and social issues in our food system are interlinked and that tackling these issues together is a far more effective solution. "*

The European starch industry association pointed out that: *"there is no "sustainable food" but "sustainably produced food". As the title of the Commission's consultation suggests, the definition should focus on the sustainability of the food system and not on "sustainable food".* This important point of clarification was made by a number of others.

The German Farmers' Association (Deutscher Bauernverband) give another simple definition: *"Sustainable agriculture and forestry is ecologically sound, economically viable, socially responsible, eco-friendly and serves as a base for future generations. "*

The Global Dairy Platform Inc: *"...think it is important for the Commission also to acknowledge that food production....also contributes positive values to society and the concept of sustainability."*

BioForum Vlaanderen sum-up the meaning/definition of agro-ecology: *"Agro-ecology relies on 'ecologism' and 'holism'. The objective is to design productive agricultural systems that require as few agrochemicals and energy inputs as possible, and instead rely on ecological interactions and synergisms between biological components to produce the mechanisms that will enable the systems to boost their own soil fertility, productivity and crop protection While the objective of genetic engineering is to improve only a single element of the agro ecosystem (modifying existing plants or designing new plants), the objective of agro ecological engineering is to improve the structure of the agricultural system and "to make every part of the structure work well" There is a fragile balance between different issues. Sustainable production and processing should strive to maintain this balance. For example ensuring biodiversity and natural habitats makes the ecosystem more resilient which implies that year after years the soil can be used to produce healthy and strong crops. This continuous production is a key factor in food security, employment and economic prosperity."*

SLOW FOOD identify three main types of sustainability: *"...environmental, economic, socio-cultural sustainability. An environmentally sustainable food system maintains over time the quality and renewability of natural resources, preserves biodiversity and guarantees the integrity of ecosystems. An economically sustainable food system generates income and workplaces over the long term, reaches eco-efficiency, provides a competitive environment where quality prevails over quantity and prices reflect the true value of food. A socio-culturally sustainable food system guarantees fair access to fundamental rights (safety, health, education), conditions of well-being (education, social relations) within a community, opportunities to create and develop internal and external relations involving the community, and recognises the cultural value of the product. These types of sustainability cannot be*

considered as separate aspects. They are strongly interrelated and therefore have to be analysed with an integrated approach. "

Sustain, the alliance for better food and farming, stress that: "We have ticked all the boxes above, except 'economic growth' and 'competitiveness'. This is because endless growth on a finite planet is impossible."

3. Better technical knowledge on the environmental impacts of food products

Below are some figures coming from the consultation in relation to the options presented on developing 'better technical knowledge on the environmental impacts of food products' – giving the % how considered the action fairly or very effective.

Action	% of sector that selected actions as 'very' or 'fairly' effective						
	Individual responses	Production and agriculture	Manufacturing	Wholesale and Retail	Consumer organisations	Nature, animal welfare and health	Governmental
Develop a standardised methodology for measuring the environmental impacts of food products	88	63	87	77	92	81	92
Make data on the environmental impacts of food more transparent and accessible	96	85	92	88	92	91	100
Develop technical guidance on how to identify more sustainable food products	88	76	49	71	92	60	92
Develop sustainability criteria for specific food products	87	65	44	59	100	67	92
Quantify in economic terms, the environmental and social costs associated with food products or diets (i.e. any hidden costs or 'externalities')	88	66	44	76	100	89	100

For each of the questions, below is a summary of who responders thought should lead such an action and an indication of how many did not think the action was needed at all:

Develop a standardised methodology for measuring the environmental impacts of food products:

A significant majority (90%) felt that this should be a European, or globally led initiative. (44% in each case.) Only 4.5% felt that this action was not needed.

Make data on the environmental impacts of food more transparent and accessible

A significant majority (85%) felt that this action should be globally or EU led. (40% and 45% respectively.)

Only 2.5% felt that this action would not be effective.

Develop technical guidance on how to identify more sustainable food products

48% considered this to be an issue that should be led by the EU.

Only 2% thought that the action would not be effective.

Develop sustainability criteria for specific food products

35% considered this to be an issue that should be led by the EU, 29% thought it should be globally led and 13% nationally.

4% thought that the action would not be effective.

Quantify in economic terms, the environmental and social costs associated with food products or diets (i.e. any hidden costs or 'externalities')

41% considered this to be an issue that should be led by the EU, 33% thought it should be globally led and 15% nationally.

5.5% thought that the action would not be effective.

Highlights coming from the written comments:

When asked to elaborate on their choices for how we could get better technical knowledge on the environmental impacts of food products, opinions varied widely about what the best approach should be. Not everyone was convinced by the possibility or need of getting better technical data on food impacts. Many said it would be difficult/expensive and suggested that a cautious approach should be taken. Others felt that it could be useful, but in most cases the point that better data alone would not 'solve' the bigger sustainability questions and that it should not detract from taking action now on the problems that we already know enough about.

Barilla tell us that based on a study that was conducted in Italy in 2011 "*Over 90% of consumers know that their choices have an impact on the environment, but are not able to distinguish the differences between the different types of food which, in any case, they tend to underestimate.*"

The UK farming unions say that: *"Taking a holistic food chain approach, we believe that we need action to ensure much greater transparency in terms of where food comes from and how it is produced."*

The German Farmers' Association - Deutscher Bauernverband: *"... sees limited added-value in developing a standardised methodology for measuring the environmental impacts of food products. The margin of error for such methodologies can be greater than the observable difference between products themselves. There is a significant lack of freely available open sources and good quality data which would make information produced through such a methodology misleading. All of this makes footprint assessment time-consuming and expensive for the operators. Last but not least, the average consumer does not have the background to interpret these figures. "*

Copa-Cogeca warn that: *"A standardized methodology requires harmonized criteria (i.e. scope, boundaries of accounting, functional units etc.) and a set of highly precise data. In order not to mislead consumers, information regarding environmental impacts should be provided in context. Regarding the development of technical guidance the focus should be put on the activities production, processing and consumption rather than on specific food products. It is important to look at social cost-benefits taking into account positive as well as negative externalities without neglecting where the cost and benefits occur along the food chain."*

The Food and Drink Federation also suggest caution: *"We fully support work to improve understanding of the environmental, social and economic impacts of all aspects of food and drink production and consumption, including external or hidden costs. But we believe that attempting this through the development of a single standardised methodology focussing only on the environmental impacts of products risks diverting resources and effort into the task of measurement and away from tackling known and obvious challenges"*

De Natuurfrtuir warn that: *"A key message is that technical knowledge and improving technology alone will not save us, it's part of a sustainable strategy but cannot replace a much needed paradigm shift both in food consumption (on meat f.ex.) and production (the role and impact of staple foods). "*

Which? The UK consumer group: *"...consider that developing sustainability criteria for specific products would be useful, but it would be very difficult to do and would need to take account of a broad range of potential impacts and trade-offs eg. environmental, health, social."*

The UK Government response ask that: *"Any measures should be proportional and should not pose undue burdens or costs to businesses, Methodologies should be simple, enable the comparison of 'like with like' and be easily applied by large and small companies alike. "*

The Kent Resource Partnership feel that: *"Data will help to describe the type and scale of impacts but not directly result in improvement. Our experience to date is that in some cases data only serves to illustrate conflicts, for example, one product may have a high carbon*

footprint whilst a competing product is low carbon but with a high water footprint. The choice is then down to which impact considered to be most valuable? "

When asked which specific food product categories should be prioritised for action:

Copa-Cogeca say that: *"...there shouldn't be any specific product groups to be seen as a priority. It should be left to the stakeholders engaging on voluntary basis in the development of food product category rules to decide what products they feel need attention. "*

Royal DSM say: *"If a priority is to be set, the most consumed food should be done first, as this would have the greatest impact if mitigation techniques are faster implemented in these areas. "*

IFOAM EU GROUP tell us that: *"For the sustainability assessment of animal products simplistic footprint methods are not suited, but comprehensive approaches must, for example, allow to take into consideration that grazing animals compared to concentrate fed animals are maintaining cultural landscapes, biodiversity, and are usually not in direct competition with food crop production."*

BEMEFA, the Belgian feed association state: *"yes, prioritisation is needed. the most important/used nutrient groups need priority: palm oil, sugars, fats and soy"*

The Dutch Food Retail Association have a similar view: *"Soy and palmoil are very important commodities within used in food industry with high impact on deforestation."*

BEUC, the European Consumer Organisation offer this logical approach: *"This should be based on which foods are consumed the most and are likely to have the greatest environmental impact based on current knowledge."*

The WWF Danube-Carpathian Programme inform us that the: *"WWF has analyzed the impact of major globally traded commodities and concentrates its efforts on 15 commodities that have the greatest impacts on biodiversity, water and climate, particularly in the 35 places that WWF has identified as top priorities for conservation. Amongst these commodities are: Soy, Biofuels, Palm Oil, Sugarcane, Cotton, Beef, Dairy, Whitefish, Tuna, Salmon, Shrimps, Paper, Pulp and Timber. Taken together, these priority commodities include the five largest drivers of deforestation, the main sources of greenhouse-gas emissions from land use, and the most important fisheries for aquatic biodiversity and food supply."*

The group 'Eating Better: for a fair, green, healthy future' suggest that: *"Pigs and poultry need to be prioritised within the livestock sector as demand for the products has grown significantly in the last 50 years and is predicted to continue. Pigs and poultry tend to be intensively reared and rely on imported feed, often grown from outside Europe on land such as the Cerrado in Brazil which used to contain 5% of global biodiversity but is now mainly used to grow soy with a dramatic decrease in biodiversity and increasing the vulnerability of many flora and fauna to extinction "*

Friends of the Earth Europe have this proposal: *"We need priority action on: Meat and dairy and feeds to ensure a sustainable livestock system in Europe that minimizes resource use*

(including land, energy, chemicals, water) and which reduces its climate change emissions impact . This must include reducing consumption of meat products from industrial systems and an emphasis on pasture and domestically fed animals. We also need to work to reduce overreliance on antibiotics in the EU livestock sector. WE need to ensure consumers have access to method of production is closely linked to environmental and resource use efficiency, as confined animals do not go out to graze or forage and obtain most of their diet from cereals and protein crops products, often imported from areas where the production of these animal feedstuffs causes environmental damage."

In relation to how to take this work forwards in the future:

The UK farming unions have this suggestion: *"At the EU level, we are member of the EU farmers organisation Copa, and we believe that their work in the European Food SCP Roundtable is of great importance. The format reflects the commitment of all of those involved for improving the sustainability of the food chain and this needs to be recognised."*

Permafutura thinks that: *"All people (farmers, citizens, ...) should be given lessons in ecosystem thinking and ecosystem design. Farmers should be offered courses on ecosystem design so they can change their farm to ecosystem production, thus reducing contaminations and pollution and improving the environment in an economic, ecosystemic way. Citizens should be made aware of the profits ecosystems bring them. "*

BioForum Vlaanderen vzw suggests: *"...to include the social and economic aspects in any standardised methodology. Once an established assessment model is in place, the aim should be to make all data accessible and transparent. Arguments of 'commercial reason' cannot prevail on the right of the EU citizens to have the best available knowledge of the sustainability life cycle of their food."*

In terms of priority setting for actions on improving our technical knowledge on food products:

Barilla: *"Developing a standardized methodology and making available data on the environmental impacts of the food should have the highest priority, as it would be the basis for any further action."*

Unilever: *"Data transparency, i.e. making existing data publicly available would facilitate calculations, would allow a considerable acceleration of the process and would prevent duplication – or more – of work thus allowing considerable economies. Validated and harmonised method methodologies would allow for credible data, necessary to win public trust in claims related to sustainability in the broadest context. Therefore we welcome the PEF pilot initiated by DG Environment and are actively participating in it. The underlying problem for the pilot is the lack of reliable data."*

Bunge Europe, Middle-East and Africa (BEMEA) also support better data provision: *"Harmonized data is needed to establish solid foundations for the development of a sustainable food chain."*

Mars Incorporated think: "*The highest priority for the European Commission is to encourage research, development and technology transfer to improve agricultural development under Horizon 2020.*"

SLOW FOOD think the priority should be to: "*Develop sustainability criteria. As indicated above, the sustainability criteria should not turn into imposed obligations. Rather, they should be accessible and shared instruments to help understand and develop towards a greater sustainability of the food system. In this respect, they can be educational tools for producers, technicians and consumers. This should be the way to highlight the weaknesses of the food system and thereby find sustainable solutions.*"

4. Stimulating sustainable food production

Below are some figures coming from the consultation in relation to the options presented on developing 'Stimulating sustainable food production' – giving the % how considered the action fairly or very effective.

Action	% of sector that selected actions as 'very' or 'fairly' effective						
	Individual responses	Production and agriculture	Manufacturing	Wholesale and Retail	Consumer organisations	Nature, animal welfare and health	Governmental
Promote Regional, wholesale markets	87	78	37	50	67	70	60
Promote Seasonally produced food	96	81	34	93	100	84	100
Promote the diversification of cultivated species	91	81	55	79	90	84	80
Promote productive, intensive agriculture.	15	46	67	42	40	18	50
Promote extensive, integrated agriculture	67	73	51	69	80	77	60
Promote organic agriculture	90	63	39	86	100	87	100
Sustainable sourcing of key food commodities	82	72	82	93	70	82	70

Promote higher animal welfare standards	87	67	41	71	100	91	80
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For each of the questions, below is a summary of who responders thought should lead such an action and an indication of how many did not think the action was needed at all:

Promote Regional, wholesale markets

This was largely felt to be an issue to be addressed nationally and locally. (34% and 27% respectively)
4% thought that the action would not be effective.

Promote Seasonally produced food

37% considered this to be an issue that should be led at national level and 20% thought it should be led by the EU.

Only 1% thought that the action would not be effective.

Promote the diversification of cultivated species

39% considered this to be an issue that should be led by the EU, 21% thought it should be globally led and 20% nationally.

Only 2% thought that the action would not be effective.

Promote productive, intensive agriculture.

Of those that supported this action, a majority felt that it should be an EU led action.

50% felt that this action is not at all likely to help make the food system more sustainable.

Promote extensive, integrated agriculture

This was largely felt to be an issue to be addressed at EU and national level. (30% and 29% respectively)

7.5% thought that the action would not be effective.

Promote organic agriculture

This was largely felt to be an issue to be addressed at EU level, (45%) with 21% thinking it should be led globally

.4% thought that the action would not be effective.

Sustainable sourcing of key food commodities

This was largely felt to be an issue to be addressed at EU level, (41%) with 31% thinking it should be led globally.

Only 1.5% thought that the action would not be effective.

Promote higher animal welfare standards

This was largely felt to be an issue to be addressed at EU level, (48%) with 31% thinking it should be led globally.

3% thought that the action would not be effective.

Highlights coming from the written comments:

As can be seen from the table of responses above, this was clearly an issue that split views between the different sectors responding, with some much more likely to be supportive of policies that promote productive, intensive agriculture than others. The representatives of the manufacturing sector that responded were particularly unlikely to support regional, wholesale markets, seasonally produced food or organic agriculture as a solution for a long-term sustainable food system, whereas the environmental NGOs, for example, rated these highly. Below are some of the wide range of responses that gives a flavour of the diversity of views.

The UK farming unions felt that: "...we need to ensure that agricultural policies, stimulate rather than inhibit sustainable intensification by building confidence and reducing risk. The challenge is to move away from the short-term imperatives that tend to drive business performance. Currently there is little visible sign that the performance of retail buyers is measured by anything other than quarterly profit and loss. "

Nestlé S.A.: "...strongly recommend to take a science based approach (as opposed to one based on intuition) to policy making and encourage those practices which, from a life cycle perspective, have superior performance. In this context, it is worth noting that industrially processed foods tend to perform better on resource efficiency than their home made alternative. "

The British Retail Consortium stress that: "The benefits and disadvantages of all types of food production (for example organic, genetic modification, high animal welfare regimes and intensive agriculture and livestock farming) must be considered equally and the resultant impacts quantified and compared to local, national, EU and global policy aspirations before decisions are made to promote one form of food production over another. It is difficult to see how some of these issues in the consultation paper would make any difference to sustainable food and our rather social aspirational issues of how some groups believe our food should be produced. It also raises the issue of trade-offs, for example higher animal welfare – more intensively reared chicken may well be more sustainable but a lower welfare standard."

The Federation of the Dutch Food and Grocery Industry thinks that: "An integrated approach is needed, in which various policy options are included based on objective, scientific information. For example, for the sustainable development of agriculture, both intensive and extensive methods are required. In some areas, efficiency can be further increased, in others it should not in order to protect ecosystems. What policy option is preferable and most effective depends on crop, region, economic context, market conditions, state of the art and social circumstances."

Nourish Scotland : *"Agriculture disrupts three key natural cycles – water, nitrogen, carbon. Organic farming locks up more soil carbon, uses less water for irrigation, and does not introduce additional reactive nitrogen from the air into the soil and water. Additionally, organic farming does not introduce new compound chemicals from pesticides into the soil, air and water. "*

SLOW FOOD give the following points on sustainable food production: *"1. Promote and support agro-ecological farming: it is based on local farming knowledge, the application of traditional and modern techniques adapted to different conditions, the correct management of natural resources (biodiversity, soil, water) and social justice. Unlike the conventional approach to agriculture, agro-ecology emphasizes the importance of biodiversity, correct soil and water management and the interaction between plants, animals and the soil. 2. Promote and support Alternative Food Networks, including farmers' markets, veggie and fruit boxes, local foods, organic products and Fair Trade goods. In particular, farmers' markets are community-run markets are important social meeting points, where local producers offer healthy, quality food directly to consumers at fair prices and guarantee environmentally sustainable methods. In addition, they preserve the food culture of the local community and contribute to defending biodiversity."*

The RSPB point out that: *"The phrase 'Productive, intensive agriculture' seems to imply that more extensive agriculture is not productive. This mind set fails to recognise the multiple benefits stemming from systems that deliver multiple benefits for society eg water and carbon storage, biodiversity. Intensive agriculture can be very successful, however the current intensive model is responsible for significant environmental damage including loss of biodiversity, soils degradation water and air pollution."*

Sustain, the alliance for better food and farming think that the: *"European Commission should develop fiscal measures – taxes and subsidies – so that the price of food reflects its costs to society, the environment, and the long-term economy. Currently, these costs – in, for example, diet-related ill-health, damage to our water, soil, wildlife and climate, and unemployment and badly paid and dangerous jobs – are regarded as 'externalities' and are not reflected in the price of food."*

The WWF European Policy Office agree: *"Better use of financial instruments along the EU food supply chain to better include the current health and environmental externalities of food production and processing."*

In the UK Government response they state that: *"The food we eat has global implications through the resource impacts, land use and biodiversity impacts in other parts of the world (e.g. soya production for feeding cattle). The environmental impacts of food occur primarily in its production, we aim to make more efficient use of resources and subsequently have lower associated environmental impacts when producing food. Improving resource efficiency will help reduce operating costs as well as improving environmental sustainability."*

Friends of the Earth Europe think that the: *"Agriculture policy (CAP) needs to be directed at supporting sustainable food production to meet sustainable demand. It should be directed towards forms of agro-ecological production and there needs to be specific support for the*

development of greater domestic and sustainable feed protein production and processing capacity."

European Natural Soyfoods Manufacturers Association: *"Today, food taxation is not providing a level-playing-field. Certain foodstuffs which have a relatively high environmental footprint benefit from a privileged fiscal policy, whereas more sustainable alternatives therefore face unfair competition."*

Zukunftsstiftung Landwirtschaft (Foundation on Future Farming) suggest: *"Subsidize a) rural livelihoods and small farmers b) measurable environmental, health, cultural services and other public goods by farmers and rural artisans / do not subsidize a) hectares as such b) further industrialisation and rationalisation c) export orientation d) cheap import based animal production e) environmentally harmful practices"*

Compassion in World Farming say that: *"Regarding sustainable sourcing, the EU should cost the environmental and social impacts of its food/feed imports, eg imports of soy for animal feed from environmentally vulnerable/damaged areas in South America."*

Similarly, J Finlay and Son think that: *"Until environmental and social costs of our food systems are factored into the cost of food items, the market cannot operate to select for those food systems that are sustainable."*

More ideas were given in terms of how to implement actions to make production more sustainable, often via financial measures:

LALOUX SARL say: *"Through the CAP: -> Encourage / promote domestic production of food for livestock (protein and oilseeds) to stop imports of genetically modified soybeans from South America"*

IFOAM EU GROUP suggest: *"Increased and more consistent support of organic food and farming at EU, national and regional level Make organic agriculture the leading model under the Common Agricultural Policy so that the development of organic farming is supported appropriately in all member states"*

Copa-Cogeca think sharing information could be the way forward: *"In various member states efforts are undertaken in order to achieve sustainable intensification of the agricultural production. In this area targeted actions and in particular knowledge exchange could lead to a more resource efficient food production and are effective for the farmers as well as for the environment. Transparency in food systems is a key issue, and the further development of long term, fair and transparent relationships across the supply chain between retailers, manufacturers and farmers and agri-cooperatives is much needed."*

Association des Amidonniers et Féculiers (The European starch industry association) suggest that: *"Productive/intensive agriculture should be considered as a tool to increase land use efficiency, if at the same time good practices regarding environmental aspects of agricultural commodities production are promoted "*

By contrast, Sustain, the alliance for better food and farming: *"...do not accept the classification 'Productive, intensive agriculture' because, although this system produces large quantities of food, it destroys or damages the natural resources we rely on to produce food now and in the future, such as water, soil, biodiversity and a stable climate."*

The WWF European Policy think: *"Public procurement of the EU Member States could provide a good basis to promote sustainable sourcing and to implement the actions selected. By requesting sustainably produced food, the public authorities in EU Member States can have major influence on product choices and the production criteria for food products."*

In terms of priorities:

The German Farmers' Association think: *"The priority should be to focus at global level on sustainable sourcing of key food commodities. The world is very much interlinked so that there is no point for the EU to act in an isolated manner. "*

Copa-Cogeca feel that: *"The EU should put a stronger focus on environmental and sustainability aspects in the context of free-trade agreements with third countries and other regions in the world. This is a way forward to ensure that there will be a better balance worldwide. Otherwise, applying ever stricter requirements only in the EU would lead to a relocation of the production and at least partly food processing."*

Mars Incorporated say: *"The highest priority is for the European Commission to establish an overarching European vision and strategy for a secure, safe and sustainable food supply in terms of quality and quantity and based on the three pillars of sustainability."*

The Food and Drink Federation: *"... think the European Commission should focus on actions where it can add value to existing national and international efforts, notably through co-ordination, dissemination of best practice and the encouragement of further research. This is best done through a strategic framework based on a systems approach, rather than a series of individual interventions aimed at local or regional level."*

Primary Food Processors, PFP suggest: *"Productive/intensive agriculture should be considered as a tool to increase land use efficiency, if at the same time good practices regarding environmental aspects of agricultural commodities production are promoted. On the other hand, extensive and integrated agriculture, considered together in the table above, are not similar. Integrated agriculture, while ensuring a good level of production, also means targeting the most environmentally friendly practices, and should be considered as a middle ground between purely intensive agriculture and extensive agriculture. "*

Euro Coop, the European Community of Consumer Co-operatives think sustainable sourcing of key food commodities should be a priority *"...because this market is getting increasingly dominated by few, very big and powerful actors which de facto limit the freedom of choice of all the other operators in the food chain. The case of GM soya is one of the most emblematic in this regard. Therefore an action at European (and hopefully global) level is extremely urgent. Secondly, we urge the European Commission to promote extensive and integrated agriculture rather than intensive agriculture – in this sense we regret the bad timing of this consultation and the agreement on CAP reform."*

The WWF UK agree that Sustainable sourcing of key commodities should be prioritised: *"It needs to be clarified that from a WWF perspective sustainable sourcing includes sourcing from within the EU and from outside the EU. This means that sustainable production within the EU or globally both need to be addressed though focus and policy levers might be different within and outside the EU. "*

The Flemish Institute for Health Promotion and Disease Prevention suggest that: *"Analysis and identification of the most sustainable farming (production) systems seems essential to us (including the diversification of cultivated species and the determination of the optimal conditions for seasonal production of food). "*

The Ministry of Agriculture of Estonia tell us that: *"Estonia has for some time been worried about the power of the retail trade that has become the only outlet for the food producers. "*

Društvo Ekologi brez meja tell us to focus on: *"Organic Farming: Although organic agriculture often produces lower yield on land that has recently been farmed conventionally, it can outperform conventional practices when the land has been farmed organically for a longer time. Conventional agricultural practices often degrade the environment over both the long and short term through soil erosion, excessive water extraction and biodiversity loss."*

5. Promoting sustainable food consumption

Below are some figures coming from the consultation in relation to the options presented on developing 'Promoting sustainable food consumption' – giving the % how considered the action fairly or very effective.

Action	% of sector that selected actions as 'very' or 'fairly' effective						
	Individual responses	Production and agriculture	Manufacturing	Wholesale and Retail	Consumer organisations	Nature, animal welfare and health	Governmental
Agreeing a common set of guiding principles of what constitutes 'sustainable' diet	64	63	33	47	75	70	92
Develop ideas for food labelling schemes on-package information	93	64	33	41	92	70	83

highlighting more sustainable choices							
Run information campaigns on the environmental impacts of different food choices	93	69	34	82	92	80	100
Promote more sustainable food choices in retail outlets by increasing their availability/accessibility	94	76	38	67	92	95	91
Develop and encourage the use of Green Public Procurement guidelines, to help public bodies (or private organisations) purchase food sustainably	75	71	46	100	92	89	100
Assess the scope for using personal technology for accessing information	68	69	63	77	83	48	92

For each of the questions, below is a summary of who responders thought should lead such an action and an indication of how many did not think the action was needed at all:

Agreeing a common set of guiding principles of what constitutes 'sustainable' diet.

This was largely felt to be an issue to be addressed at EU level, (39%) with 21% thinking it should be led globally.

5% thought that the action would not be effective.

Develop ideas for food labelling schemes on-package information highlighting more sustainable choices

This was largely felt to be an issue to be addressed at EU level, (63%).

7% thought that the action would not be effective.

Run information campaigns on the environmental impacts of different food choices

This was largely felt to be an issue to be addressed at national level, (50% respondents), with 27% favouring EU action.

4% thought that the action would not be effective.

Promote more sustainable food choices in retail outlets by increasing their availability/accessibility

This was felt to be an issue to be addressed at EU level by 30% of respondents, national level by 27% of respondents and for retailers by 16%.

3% thought that the action would not be effective.

Develop and encourage the use of Green Public Procurement guidelines, to help public bodies (or private organisations) purchase food sustainably

This was felt to be an issue to be addressed at EU level by 40% of respondents and at national level by 27% of respondents.

3.5% thought that the action would not be effective.

Assess the scope for using personal technology for accessing information

This was felt to be an issue to be addressed at national level by 35% of respondents and at EU level by 23% of respondents.

4% thought that the action would not be effective.

Highlights coming from the written comments:

There was some general consensus supporting the idea of providing citizens with the information they need to make better informed choices about the food they buy, but opinions varied widely about what this information might be. Some felt that there is not yet sufficient information to say what is a 'sustainable choice' while others had specific views on which aspects of the origin/impact/makeup/production method etc. of a given food product should be highlighted. While some responders felt that information alone would be sufficient, others felt that more holistic approaches, including other policy instruments, would be required.

The European Livestock And Meat Trades Union (UECBV) say: "*On the issue of 'sustainable diets'; the first step of giving guidance on sustainable diets has to be measuring the real environmental impacts of diets.*"

COCERAL give the following advice: "*Before defining what a "sustainable" diet is it is necessary to measure the real impact of food products and thus their contribution to diet sustainability. The environmental assessment of food products is very complicated. Life Cycle Assessment (LCA) can be effectively used to identify impact categories and to address them towards improving the environmental profile of products.*"

The Spanish Food and Drink Industry Federation write that: "*Consumer information and education is a powerful tool that can help consumers to make informed choices enabling them to build balanced diets suited to their individual needs. It is however important to ensure that such information and its underlying criteria/mechanisms are factual, objective, consistent and scientifically reliable, so as to not to mislead the consumer by providing incorrect information.*"

The German Farmers' Association think: "*The priority should definitely be to develop, on the basis of guiding principles, a communication strategy in coordination between the EU and Member States towards consumers for the purchase of local/regional, seasonal food products that are produced on the basis of sustainable farming (hygiene rules, animal health/welfare, environmental protection etc.)*"

IFOAM EU GROUP propose that we: *"Run information and education campaign's for more knowledge on food and farming. Increase systematically the level of food competence in EU citizens."*

Copa-Cogeca feel that: *"The development of a communication strategy in coordination between the EU and member states is crucial in order to raise awareness at consumer level regarding the food products they buy and to fight against food wastage. Based on this communication strategy information campaigns and education programmes could be developed and operated to help to support consumers to make informed choices. In such information campaigns not only the environmental aspects of sustainability have to be underlined, but also the social and economic ones. Seasonal and local consumption should be aspects to be addressed in such information campaigns. Any information to consumers must of course be trustworthy and not misleading."*

BioForum Vlaanderen vzw state: *"Food is essential in everybody's life, but most people aren't aware of the origin of their foods and the impact of their choices on the environment or on other people. Although you might argue that information might influence their consumption behaviour, price and availability are more crucial factors in decision making. Internalization of external and hidden costs is a way to influence consumer behaviour. But it will only be efficient in combination with information about production methods and comparison between different methods. The most sustainable food should be the most affordable food."*

FoodDrinkEurope point out that: *"Dietary needs vary according to a range of factors, including age, occupation and life-style. Food choices are also subject to many different influences and behaviours, as well as access and availability. The assessment of a 'sustainable diet' needs to consider all environmental impacts (and not only GHG), as well as social and economic factors."*

The Food and Drink Federation think an integrated approach is needed. They say: *"While high level guiding principles - what good looks like - may have a role to play in raising awareness and improving understanding of the underlying issues, the evidence from similar work in relation to nutrition and obesity (such as the Eatwell Plate and Five a Day campaigns in the UK) shows that it is very difficult to achieve change at consumer level solely through information and labelling. This suggests that action is needed on many different levels and in many different areas, including further research on the drivers of behaviour change. "*

Nestlé S.A. warn: *"...it should be noted that on-pack labels are not the only, or the best, place to provide consumers with relevant information on sustainability characteristics."*

The Global Dairy Platform agree. They say that: *"Labelling as a means of education around healthy diets is not the answer – it only considers individual components and not a total dietary approach. It does not promote behaviour change as well."*

CLITRAVI, (the Liaison Centre for the Meat Processing Industry in the EU) wrote: *"On the issue of 'sustainable diets'; the first step of giving guidance on sustainable diets has to be measuring the real environmental impacts of diets. Foods, the services and the nutrients they provide, cannot be easily substituted. Bio-availability is also highly relevant in assessing*

whether some of the proposed alternatives are actually alternatives. If they are not, a 'sustainable diet' does not comply with nutritional guidelines, which makes its usefulness questionable. "

FoodServiceEurope: "...recognises the European Commission's guidance on green public procurement (GPP) but hopes that future guidance will recognise the need to consider the environmental impact of food and drink products throughout their entire lifecycle. At the same time, GPP guidelines need to reflect what can be delivered in a competitive market place under existing public sector budget constraints; otherwise they will fail."

Sustain, the alliance for better food and farming stress that: "... food consumption can be made more sustainable if it is easily affordable, readily available and attractively marketed. This requires using fiscal measures to allocate the costs of unsustainable food production and consumption so that these are reflected in higher prices for these products. Sustainable food will therefore be relatively more affordable, in comparison."

Friends of the Earth Europe think the priority action should be to: "Develop sustainable diet principles into suitable and accessible guidance for different consumer groupings and require MS to deliver ten year promotional programmes with annual targets and outcomes measured for changing diets. This must include reference to eating less but better animal products, replacing animal with plant products, eating more fruit and vegetables, wasting less, eating less junk food."

The EU Association for container glass are not convinced by the scope of the consultation. They write: "To the authors of this consultation sustainability seems to be limited to "environment" e.g. run info campaigns on environmental impacts of different food choices or encourage the use of Green Public Procurement. What is very surprising is the total absence of healthy eating. By focusing on only one pillar of sustainability policy-makers will miss opportunities to encourage health and economic wellbeing of people. "

The UK Government response states that: "There is no single solution to increasing sustainable food consumption. Food behaviours are driven by a variety of factors including access, appeal and awareness and consumers have only a limited degree of influence on what they choose to consume. The evidence shows that attempts to promote sustainable food consumption must be delivered at multiple levels by multiple levers of change (Government, businesses and civil society). Provision of information to consumers is only one element of a much broader behaviour change framework." "We believe that the Commission could play a valuable role in coordinating and disseminating evidence on the most effective tools for influencing behaviour change. Some of the proposed options, such as those focussed on campaigns to build awareness of sustainability would only be effective as part of a much wider package of varied intervention. "

The Swedish Environmental Protection Agency and the Swedish Board of Agriculture, jointly pointed out that: "...it is important to promote more sustainable food choices also in restaurants and public catering. There is a need for improved vegetarian options and development of alternatives with reduced amount of meat. Pricing is an important aspect and economic instruments are needed."

The UK farming unions think: *"Guiding principles on sustainable diets should be developed in a coordinated approach between EU and Member States."*

Nestlé S.A.: *"...propose that the High Level Forum for a better functioning food supply chain is tasked to develop a common set of guiding principles on how to improve the sustainability of diets."*

The Lancashire County Council point out that: *"Any labelling schemes would have to be legislated for. There are already issues with a number of differing schemes for front of pack labelling regarding nutrition. This leads to consumer confusion. It would be more useful to develop one scheme based on one set of principles and guidelines, as to what constitutes sustainability to prevent 'artistic interpretation' of the criteria, leading to a false impression being given about the sustainability of products."*

Mars Incorporated think that: *"Information campaigns should be run on all aspects of food, including nutritional, environmental, ethical and socio-economic aspects. This could result in more respect for food, better informed consumers and hence a more sustainable consumption pattern"*

UNEP do not feel that the consultation tackles the core of the problem. They feel that: *"...the options provided do not clearly articulate the fact that a paradigm shift in the way that food is produced is needed."* And that *"This intensification and concentration has been built upon industrial economies of scale that have on the one hand enabled a rapid increase in the global food supply, however on the other, at a cost of environmental degradation linked to food and agriculture production."*

6. Preventing and reducing Food Losses & Food Waste

Taking actions to tackle food waste were strongly supported by the public consultation, particularly at EU and national level.

UNEP stated simply that: *"By reducing food loss and waste, the overall availability of safe and nutritious food for human consumption is improved and the pressure on our ecosystems decreased."*

Of the actions presented in the public consultation, some were considered to be more national than EU competence, but in a majority of cases there was support for the EU to take a leading role. The table below shows the actions proposed and the most favoured lead actor/s.

Action	Who should lead action? (most favoured)
a. Develop/disseminate consumer information on avoiding over-purchasing.	EU/national
b. Develop/disseminate consumer information on the meaning of food date labels. ('best-before', 'use-by', 'sell-by').	EU
c. Develop/disseminate consumer information on better storage of food.	National
d. Develop/disseminate consumer information on more sustainable food preparation and use of leftovers.	National

e. Establish new education campaigns on food waste prevention aimed at children.	EU/national
f. Establish new education campaigns on food waste prevention aimed at adults.	EU/national
g. Facilitate the exchange of good practices on food waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.	EU
h. Clarify the EU VAT Directive for donation of surplus food to food banks for Member States and businesses.	EU
i. Encourage best-practice in relation to food date labels by food business operators to minimise wastage.	EU
j. Develop EU Food Donation Guidelines for food donors and food banks on how to comply with the EU Food Hygiene legislation.	EU
k. Agree a common EU definition of food waste, classifying products as food, feed or waste etc. as appropriate.	EU
l. Develop a standardised methodology for collecting and reporting data on food waste to ensure data comparability across Member States.	EU
m. Introduce reporting requirements on food waste.	EU
n. Set binding targets for food waste prevention.	EU

Looking at all groups other than 'interested individuals', actions 'a' and 'c-f' (that focus on development and dissemination of information materials and establishment of education campaigns), are overwhelmingly considered as the responsibility of national governments.

For those actions considered to be principally EU competence, (b, g-n) the following results are seen by group/sector, in terms of actions were considered to be 'very' or 'fairly' effective:

		% of sector that selected actions as 'very' or 'fairly' effective								
Action		Individual responses (366)	Production and agriculture (40)	Manufacturing (38)	Wholesale and Retail (17)	Consumer organisations (12)	Nature, animal welfare and health (41)	Packaging (4)	Governmental (14)	Redistribution (3)
b.	Develop/disseminate consumer information on the meaning of food date labels. ('best-before', 'use-by', 'sell-by').	83	85	95	77	92	73	75	93	100
g.	Facilitate the exchange of good practices on food waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.	87	93	92	100	92	88	100	100	100
h.	Clarify the EU VAT Directive for donation of surplus food to food banks for Member States and businesses.	75	62	74	88	58	66	50	64	100
i.	Encourage best-practice in relation to food date labels by food business operators to minimise wastage.	79	74	79	82	92	76	50	93	100
j.	Develop EU Food Donation Guidelines for food donors and food banks on how to comply with the EU Food Hygiene legislation.	58	67	67	82	67	56	67	71	100
k.	Agree a common EU definition of food waste, classifying products as food, feed or waste etc. as appropriate.	50	69	84	88	67	65	100	86	100
l.	Develop a standardised methodology for collecting and reporting data on food waste to ensure data comparability across Member States.	52	61	84	71	83	68	67	86	100
m.	Introduce reporting requirements on food waste.	50	41	36	29	83	80	33	79	100
n.	Set binding targets for food waste prevention.	55	40	26	24	83	83	0	86	100

From these results the following observations can be made in terms of opinions on EU led actions:

Actions focusing on disseminating information on the mean of food labels, and exchanging good practices, (b. and g.) are very strongly supported by all groups, with the latter being the most favoured option in all but one case.

Proposals for actions to introduce reporting requirements and to set binding targets split the groups opinions, with individual responders and food chain industry representatives, in general placing these as their least favoured options, and with consumer organisations, nature, animal welfare and health groups, redistribution and governmental representations being much more in favour of these options.

By group:

Individual responders strongly supported actions on providing better information on date labels, promoting exchange of good practices and clarifying VAT rules, but were less convinced on setting definitions, methodologies and targets on food waste, with only around half considering these as fairly or very effective measures.

The **Production and agriculture** sector very strongly supportive of better information on date labels and promoting exchange of good practices, but were much less convinced on the introduction of reporting requirements or binding targets, with only around 40% marking these down as fairly or very effective. 69% of respondents in this sector did, however, feel that agreeing a common EU definition of food waste would be effective.

The **Manufacturing** sector also very strongly supportive of better information on date labels and promoting exchange of good practices, but were even less convinced on the introduction of reporting requirements or binding targets, with only 36% and 26% respectively marking these down as fairly or very effective. They were very supportive, however of the option of agreeing a common EU definition of food waste and developing a standard measurement methodology.

Wholesale and Retail strongly supported all actions other than the introduction of reporting requirements or binding targets, for which only 29% and 24% respectively of respondents considered these as fairly or very effective.

The **packaging** sector respondents were very strongly supportive of better information on date labels, promoting exchange of good practices and on setting a standard definition, but only 33% and 0% supporting a common EU definition of food waste and developing a standard measurement methodology.

Consumer organisations very strongly supported better information on date labels *and* promoting exchange of good practices and development of methodology, introduction of reporting requirements and binding targets, with the latter three actions considered effective by 83 % of those responding.

In a similar way, **nature, animal welfare and health** associations put promoting exchange of good practices, alongside the introduction of reporting requirements and binding targets as their favoured options, with 83% supporting the setting of binding targets and 80% the introduction of reporting requirements.

Those **governmental representations** responding were strongly in favour of almost all options, very strongly favouring better information on date labels, promoting exchange of good practices and also setting definitions, methods and targets, all consider fairly or very effective by 86% of respondents.

The **redistribution** sector, while not represented in the survey in great numbers, was very strongly supportive on actions to prevent food waste across the board.

Below are some of the highlights coming from the consultation:

The Swedish Environmental Protection Agency have developed consumer information on how to reduce food waste that summarises the basic messages that need to form part of a food waste prevention campaign:

- Plan your food purchases and don't buy more than you need.
- Use food before it spoils – keep track of what you have in the refrigerator, including those hard to reach spots way in the back.
- Store food properly:
 - Put fresh meat, fish, dairy products and other chilled goods in the refrigerator as soon as possible. Keep your refrigerator at around 4-5° C.
 - Most fruits and vegetables last longer in the refrigerator. If you want to keep fruit in a fruit bowl on the coffee table, be sure to use them as soon as possible.
 - Freeze any items that you want to keep for an extended period of time – set your freezer at around -18° C.
- Don't throw food away just because the best-before date has passed; many items are just fine for a long time after that. Look, smell and taste any items that you think might be spoiling, and trust your senses. If you have stored an item according to the instructions, it will still be safe to eat even after the best-before date.
- Be creative with leftovers - prepare a smorgasbord, use them in a new recipe or freeze them."

Tesco pointed out that: "According to the Waste Resource Action Programme confusion around on pack date labels and storage guidance is a major contributing factor to household waste and our own research supported these findings. "

The Belgian Government made an important point that: "Food donation and food waste prevention should be seen as 2 separate policies : the donation cannot depend on the bad management of food systems." And that on definitions it is "important to set a definition which was understandable for all stakeholders and which contained the distinction between food losses and unavoidable secondary fluxes (like peels and seeds). The cascade of value retention must be taken into account meaning the priority for reuse must go to food and feed, a second lead are materials and chemicals, and energy at an even later stage."

The Swedish Environmental Protection Agency stated that "Sweden is developing a proposal for national targets for prevention of food waste as a part of the Swedish Environmental Objectives system. The environmental quality objectives describe what quality and state of the environment are sustainable in the long term. As a part of this work we are identifying

the most cost effective measures and policy instrument to prevent food waste in the whole value chain. "

"One of the environmental targets regarding waste management on a national level in Sweden is to reduce the amount of food waste by 20 percent from 2010 until 2015."

Ministry of Economic Affairs Netherlands think that: *"Food waste should be a major topic of the Communication. It is vital that we reduce food loss. The Netherlands urges the Commission to investigate whether more products that keep and retain their quality for a long time can be exempted from the requirement to state a date of minimum durability on the label (extension of Annex X of EU Regulation 1169/2011).*

A sound interpretation of figures on food waste, uniformity of methodology (as in the FUSIONS project) and transparency throughout the entire food value chain are prerequisites for targeted action. For some time now, the Netherlands has been attempting to identify the scale of food waste. The Commission and the member states must create a climate in which it is a matter of course for companies to reveal their food waste statistics. The Commission could use current research programmes, such as FUSIONS, to encourage companies to monitor food waste throughout the value chain."

The NGO Food & Water Europe feel that: *"The Commission can assist with clarifying or rewriting regulations then ensuring they are enforced. Educational campaigns are probably best placed as locally as possible to ensure they make sense to local recipients and meet local needs and preferences."*

WWF want the Commission to: *"Set binding targets for food waste prevention. Food waste or rather the "overproduction" of food waste is a massive problem, which could, if properly addressed, reduce the pressure on the environment significantly. By setting binding targets for all actors along the food chain a reduction of waste would be guaranteed, more than when only opting for voluntary measures.*

Also, introduce reporting requirements on food waste: It is unclear how much food waste is produced. Reporting requirements would not only allow for a better overview but as well for a better control of the industry sectors. The reporting requirements would as well provide the necessary data to determine binding targets on food waste"

The European Organization for Packaging and the Environment stress that: *"Packaging's positive role in protecting food and thereby preventing food waste should be taken into account in all EU and national waste and packaging-related policies. Simply reducing packaging is not always desirable because the likelihood of food spoilage arising increases as packaging is reduced and/or compromised, and the product is no longer adequately protected. Eventually a point is reached at which the negative environmental impact of food waste outweighs the environmental benefits of using less packaging material."*

The Food Ethics Council say that: *"We of course need action across all of these areas, and this action needs to be properly, strategically joined-up. We would especially stress the proven efficacy of binding targets."*

SLOW FOOD pose this question: *"Agree a common EU definition of food waste and food losses– why? Because all other actions need to be built on a clear definition of food waste and losses. Based on this definition, measures can be determined concerning the re-use of food for human or animal consumption or for energy purposes. The definition should not encourage increasing market price for food waste, which would create an incentive for further food waste (e.g. for biofuels production).*

Review/simplify the standardization of products for the EU market– why? It would reduce food loss at the post-harvest stage with immediate results.

Actions a.b.c.d.e.f – why? To enable consumers to make informed choices about food purchase and consumption with immediate results."

Unilever state that: *"First of all those action that are in the remit of the Commission should be prioritised, i.e. formulating definition, defining validated methodologies and European guidelines. All other initiatives should be undertaken by stakeholders, i.e. Industry, Retail, Associations and Organisations with support of the Commission where possible."*

Merseyside Recycling and Waste Authority think: *"It is important that a consistent approach towards definitions and calculation methods is achieved across the EU before any new EU waste targets, including food waste prevention, are set. Without consistency, there is a risk of setting legal targets based on inconsistent data, loose definitions and a lack of justification in terms of securing value for money environmental benefit."*

Last Minute Market feel that: *"All these actions are equally important. It would important to set targets at National and European level (see the European Resolution on Food Waste), but also to involve citizens in the fight against food waste."*

Copa-Cogeca believe that: *"A high priority should be given to the development of education programmes well targeted to various groups of consumers in order to achieve long-lasting behavioural changes. They could be backed by an EU wide coordinated education campaign in order to further raise awareness. It is also very important to agree on a common terminology and ensure that this concept once determined can be defined and applied evenly all across Europe. We would like to stress our position against any attempt to reduce the level of food safety standards (food and feed safety, animal health and welfare...) or product quality standards in force: these standards should not be considered as elements of constraint as such but rather as necessary safeguards."*

7. Improving food policy coherence

In response to the question of what would be the most important aspects of the food system that would need to be addressed to make it more sustainable many pointed out inconsistencies / incoherence between policies:

IFOAM EU GROUP said that: *"...health programmes aim to target obesity and food related diseases, but Common Agricultural Policy (including promotional policies) has not yet led to a situation where fresh healthy food would be better available and promoted (even school fruit and milk programmes are not always taking health aspects sufficiently into account)As*

general rule , agriculture should not be included in 'free trade agreements', since it often means that countries with weak economies are not allowed to use import tariffs to protect their growing food industries or their farmers from floods of cheap imports and consequently lose many food producers that could provide food security for domestic consumers and employment. "

EUCOLAIT write that: "Labelling information on nutrients and calories content is inadequate to address the complex relationship between food and health and potentially gives wrong incentives to consumers"

Copa-Cogeca point out that: "It has to be taken into account that food production is strongly demand driven and that therefore further restrictions in agricultural production in the EU are unlikely to solve the problem of unsustainable diets or the problem of food wastage"

Maa- ja metsätaloustuottajain keskusliitto MTK ry think that: "Agri and Envi - DGs should cooperate much more than today - that way they would learn each others business! "

The Irish Co-operative Organization Society have a similar perspective, in a way: "EU Envi/Climate Change policies often stifle the obvious need for us to grow production. Completely at odds with some Agri policy."

McCain Foods: "...is concerned at possible inconsistencies between EU renewable energy targets and work on food waste. We are concerned that overzealous application of the food waste hierarchy in future policy measures to reduce food waste could have a negative impact on the use and uptake of anaerobic digester technology and would welcome further examination of this issue."

Unilever: "...recognizes the importance and role of consumers in achieving the shift towards sustainable diets. Consequently it is necessary to address behaviour, attitudes and habits and not simply the agricultural supply chain. In the area of trade and agricultural policy the shift towards sustainable diets would be facilitated by further revision of the EU Common Agricultural Policy (CAP) to incentivise EU farmers to produce sustainably, i.e. by guaranteeing a consistent implementation of the EU's cross compliance mechanism that ties income support for farmers to compliance with environmental and animal welfare standards. The use of biomass for energy is currently stimulated by government programmes including tax breaks, subsidies and mandates for the use of bio-fuels. The main issue comes from first generation bio-fuels that are made from food-grade feedstocks – such as vegetable oils or starch ethanol – and, as a consequence, compete heavily for land presently used for growing food. This could destabilise the world food supply and increase local food shortages and prices. Moreover, first generation bio-fuels often cause more greenhouse gas emissions than the fossil fuels they replace, due to land use change. We believe governments have the responsibility to subject their renewable energy policy to a full lifecycle impact assessment. The development of new generation bio-fuels that do not compete with food crops is essential."

France Nature Environnement stressed the need to look at health and safety vs waste policies: "Il y a des incohérences entre les mesures d'hygiène et de sécurité alimentaires et la

prévention du gaspillage alimentaire. L'hygiène et la sécurité alimentaires sont importantes mais ces règles peuvent être un frein à la réduction du gaspillage alimentaire. Elles peuvent également être un frein au travail avec des producteurs locaux. Par exemple, si la restauration collective est obligée d'utiliser des oeufs en bouteille, elle ne peut pas acheter d'oufs chez le producteur local (éventuellement biologique)."

FoodDrinkEurope think: *"Inconsistencies in the area of environmental sustainability, biofuels, CAP and development should be tackled. In particular biofuels policy should be reoriented and support both environmental objectives (the absolute reduction of direct and indirect greenhouse gas emissions) and social priorities (food security, development aspects)."*

Comité Européen des Fabricants de Sucre tell us that *"the EU's future Single Common Market Organisation (CMO) Regulation, as well as the EU's trade and development policies, should be consistent with the objectives of the Europe 2020 strategy towards environmental and socio-economic sustainability"*

The Dutch Food Retail Association point to the following inconsistency: *"Subsidizing anaerobic digestion, while meanwhile considering digestion of food waste to be a low-level means of recycling"*

SLOW FOOD write that: *"Because of the huge impact of the food system on the environment, the European food policy should derive from the acknowledgement of the planet's ecological limit and be consequently shaped to face this challenge. The only pressing question from which the European policy agenda should depend on how to meet the limits of the finite resources of our planet, consequently guiding a process of resources efficiency and of individual responsibility. The economic, social, cultural and policy framework should derive from the answers to this overarching question."*

Which?, the consumer group point out simply that: *"There is currently no EU food policy, there is only an EU agriculture policy. Different parts of the European Commission that have responsibility for food issues have differing priorities."*

The European Vegetarian Union (EVU) point out that: *"Health experts and authorities recommend an immensely lowered consumption of animal products. Still governments support animal products through subsidies and taxes. This is a strong inconsistency which puts public health and the environment at stake"*

Keep Britain Tidy say that: *"....there are many inconsistencies and incoherence between policies related to food production and consumption in the context of addressing global food security i.e. feeding a growing and more affluent global population of 9bn by 2050 healthily, sustainably, ethically and equitably, within the resource capacity of the earth, while also preventing dangerous climate change. These include : - the export/promotion of developed economy diets and lifestyles to the developing world is unsustainable - goals of GDP growth – based on ever increasing consumption/population growth – are unsustainable - short terms goals (for politics and the economic 'market') are given priority over longer term social, environmental, economic sustainability benefits"*

WWF Danube-Carpathian Programme feel that: *"Environmental targets the EC committed to but which are not acknowledged in the food or waste sector, such as climate targets or the target to half deforestation by 50% by 2020 are counteracted by policies that do support more production or consumption, no matter the ecological cost. Wrong financial incentives (such as harmful subsidies) leading to shifts in commodity production and availability such as subsidies for corn production for biogas or subsidies for biodiesel which led to increased imports of soy to replace the rapeseed in food production, do increase the pressure further. Health policies that do not take into account sustainability factors If SCP in relation to food is to make substantial progress, a much more holistic and joined up approach is needed, including much greater cooperation between the different Commission directorate generals with an interest in this area. "*

Chris Gallasch, Eurogroup for Animals (registered: 6809935493-49) : *" Unfortunately, sustainable animal products and animal welfare friendly systems of production are often at a disadvantage when compared to less sustainable ones. Very intensive production systems that produce large quantities of animal products at cheap prices without respect for welfare or the environment are often more profitable in the short term, and this threatens the sustainability as well as the animal welfare friendliness of farming systems both inside and outside of the EU, and it also affects the quality and safety of products."*

Duncan Williamson, WWF UK: *"On the one hand we are promoting the production of livestock products and sugar beet, whilst on the other we advise people to eat plant based diets and to eat less sugar. CAP subsidies exacerbate this with cereal and livestock farmers getting significant funds, and often large corporates take large subsidies to promote food high in salt, sugar, meat or dairy. This comes from EC member states taxes. "*

Sean Roberts, Food Ethics Council: *"Food businesses, even the progressive ones, will generally be anxious about trying to sell consumers what consumers don't seem to want - they don't want to be more than one step ahead of their customers. This puts the onus on consumers to drive sustainable food systems. Government for their part is desperate to avoid any impression that they might be 'telling people what to eat' : so instead, they see their responsibility as being to ensure that people have access to the information that they need in order to make informed choices about the sustainability of their food – again putting the onus on the consumer. The problem is that by and large people do not want this responsibility – they want issues around environmental impact, labour standards, animal welfare and so on to be taken care of by the people producing and selling their food, so that they can base their decisions on personal priorities and preferences."*

Michael C. Appleby, World Society for the Protection of Animals 77141895594-88: *"there is a manifest lack of political will to meaningfully address consumption issues."*

In relation to regulatory, or other, barriers to sustainable food production and/or consumption:

Genevieve Savigny, European coordination via campesina: *"Hygiene rules, edicted for the good of consumers, result in the difficulties for small farmers (and enterprises to continue farming) Seed regulation almost completely prevents farmers from using traditional seeds, with a great loss of biodiversity "*

IFOAM EU GROUP, : *"environmental costs are currently externalised in food production, this leads to a situation where food which is produced in a more sustainable manner is usually more expensive due to higher production costs (and the societal costs not being considered in price calculation)production of locally adapted crops is made difficult through requirements for registration of plant varieties that are made for industrial dimensions (EU legislation for the marketing of plant propagating material)EU food hygiene rules are made for large production facilities and long product shelve life; this legislation is key to prevent major food scares form large scale production and distribution, but adapted rules for local markets are necessary - the possibility to create such rules are not sufficiently used by member states;EU labour regime makes it possible to hire cheap labour within EU regularly leading to exploitation of farm labour. Sustainable food production should also refer to this aspect. "*

Jean Reidemeister, Mars Incorporated: *"The highest priority is for the European Commission to establish an overarching European vision and strategy for a secure, safe and sustainable food supply in terms of quality and quantity and based on the three pillars of sustainability. It should be based on a holistic approach, focus on goals and objectives, and recognise the global nature of food supply chains. The Commission should ensure all relevant EU legislation is consistent with this vision and strategy."*

Irene Lucius, WWF Danube-Carpathian Programme: *"Political long term views are missing or are dominated by market influence decisions. (especially habits of consumers don't change overnight). § There is an absence of political working structures at EU level that allow for a common approach across different policy areas (thinking/working in Silos or according to thematic issues)."*

WWF UK: *"The current food system is not joined up and the different national and international bodies rarely work in across the issues. Instead they work on their section – health, agriculture, economy, business etc. This silo working is a key problem that has resulted in an unsustainable food system and opportunities lost"*

The Food Ethics Council: *"There is a general recognition that we need to start paying the 'true cost of food', that food prices need to reflect the full costs of production and consumption. However, discussion of this necessity tends to assume that consumers will inevitably be the ones to shoulder the burden of these additional costs – which then becomes a significant barrier, given how many people already can't afford to feed themselves adequately. "*

When asked how to address any policy inconsistencies or regulatory barriers mentioned previously:

The Irish Co-operative Organization Society said we need: *"More dialouge and meetings between stakeholders in the areas. Policy too 'siloed'."*

FIAB- Spanish Food and Drink Industry believe that: *"..collaborative approaches such as the High Level Forum for a better functioning food chain (HLF) are needed to ensure that economic growth, social and environmental objectives, are addressed in a coordinated manner. Isolated efforts to address structural issues will not allow for long-lasting strategies and solutions. We therefore support the development of a food specific industrial policy. "*

The British Retail Consortium points out that: *"There is no strategic policy that supports and promotes sustainable production and consumption at an EU level. Europe needs to have a more coherent discussion on food policy that addresses all issues from the support to farmers and what is required from them through to issues such as labelling which can help inform consumers. Currently there is no comprehensive discussion looking at all the issues from our approach to trade, new technology, agricultural support and many other areas relevant to a comprehensive food policy."*

The Federation of the Dutch Food and Grocery Industry think: *"The EU should develop a common, long-term, consistent and holistic policy vision on the sustainability of the food system, in cooperation with relevant market actors. Then all existing European and national policies and regulations should be aligned to this view."*

FoodServiceEurope state that: *"Working in partnership with food chain stakeholders is the most effective way to overcome inconsistencies and regulatory barriers. Both bilateral dialogue and discussions under existing initiatives such as the Food SCP RT and the High Level forum can achieve this. "*

Friends of the Earth Europe stress that: *"An overarching Sustainable Food Policy Strategy is required. This would encompass a new set of integrated goals on production, consumption and governance to achieve the changes needed. Those changes would be set out in a clear manner to show how EU food system must change in 5, 10 50 years. This will require policy coherence on agriculture, food, trade, planning, competition, biodiversity, climate and so on."*

Eurogroup for Animals give the suggest the following strategic approach: *"a) Support animal welfare and environmentally friendly farming and production methods under CAP; b) Ensure well-defined minimum animal welfare standards in legislation that support environmental outcomes; c) Include measurable animal welfare requirements in all bilateral/multilateral trade and veterinary agreements that improve animal health and welfare and will reduce transport; d) Support animal welfare friendly production methods in developing countries as an alternative to industrial livestock production methods that neglect welfare; e) Support market-based instruments designed to internalize costs, such as a tax on excess manure production and transport emissions, and provide reduced tax obligations for animal welfare friendly systems; f) Ban subsidized exports and imports of farm animals, which disrupt efficient and environmentally friendly markets; g) Provide assurance that environmental impact assessments fully integrate animal welfare into their considerations; h) Research and develop animal welfare friendly systems with positive environmental impacts; i) Raise awareness of animal welfare friendly systems and support sustainable diets including less but better meat; k) Support animal welfare friendly farming systems and products through public and private procurement and CSR"*

The Ministry of Agriculture of Estonia believe that: *".. competition law sees the retail market as the usual competing place for both suppliers and buyers. Each chain has the market share that does not cross the line of market control. The reality seems to be that suppliers, most of them directly food producers, do not have alternative markets to sell, than to retail. This*

means the different branded retail chains can act, without any illegal agreements, similarly/equivalently, when obtaining the products. "

On how the overall governance of the food system could be adapted in order to ensure more coherent action at EU level:

IFOAM EU GROUP believe that : *"Sustainable and healthy food should become an overarching policy topic in the EU, with clear targets that are implemented in related policies. European support policies, especially the CAP, and state aid rules for national and regional subsidies must ensure that food related subsidies that harm health or environment are abandoned. "*

WWF UK recommends: *"A single department within the European Commission that would cover all food policy and would be open to transparent collaboration with the civil society and business alike is vital."*

The Belgian feed association urge a global perspective: *"political decisions must be taken at global level to guarantee that everything is harmonized and inconsistencies do not develop. "*

SLOW FOOD think that: *"From a logic point of view, the section "Improving food policy coherence" should be considered as the priority action of the Communication on food sustainability, if we really want to make a sustainable food system happen. All the other actions, if implemented in a incoherent food policy framework, will not be as effective as they could be if all the efforts of the EU would go in one direction. "*