

CropLife Europe position on the Sustainable Food Systems initiative

The European Commission's (EC) Sustainable Food Systems legislative proposal, expected by the end of 2023, aims to ensure that all foods placed on the EU market become increasingly sustainable.¹ CropLife Europe supports this goal and hereby expresses its priorities for the future framework legislation.

- **The sustainability of food products should be analysed based on their overall contribution to the environmental, social, and economic pillars of sustainability. To avoid undermining the EU's sustainability goals, any assessment should be evidence-based and equally applying to all production models without distinction.**
- **Food safety and food sustainability are conceptually different things. Their assessment should remain separate, in order to avoid unnecessary confusion and further increasing the burden and unpredictability of the EU decision-making process for stakeholders and authorities.**
- **We encourage the EC to prioritise multilateral agreements to address global sustainability issues. Unilaterally imposed sustainability requirements for imported goods may be unfair and discriminatory, and create unnecessary trade frictions with partners.**

1. Lasting change requires all three pillars of sustainability to be addressed in parallel

Sustainable food systems, as defined by the Food and Agriculture Organisation², refers to a "food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised". This definition, also incorporated in the EU Code of Conduct on Responsible Food Business and Marketing³ (EU Code of Conduct), affirms the equal importance of the social, economic, and environmental pillars of sustainability.

With this in mind, we encourage the EC to design the proposal for a Sustainable Food Systems framework in such a way that all three pillars of sustainability are equally assessed and considering trade-offs and synergies between them.

2. A future framework should build on past achievements and explore all routes to sustainability

Different routes to promoting sustainability must be assessed in order for fit-for-purpose solutions to be designed. **Voluntary approaches and mechanisms to reinforce existing legislation should be explored in the same level of detail as the idea of a new framework.**

Voluntary initiatives currently in place can attest to the effectiveness of pragmatic approaches to drive forward sustainability goals. The EU Code of Conduct, which gathers over 110 signatories from nearly 50 sectors,⁴ including CropLife Europe, is a recent example of a multistakeholder exercise with concrete positive outcomes. Similarly, the EU Soy Sourcing Guidelines developed by the European Feed Manufacturers' Federation (FEFAC)⁵ has greatly improved market transparency through a benchmarking programme for responsible soy schemes. FEFAC estimates that for the marketing year 2018/2019 at least 78% of soy imported to the EU came from origins where no or negligible deforestation risk existed.⁶

We also encourage the EC to look into the cumulative effect of planned policy initiatives on this topic, such as those described in the Farm to Fork and the Chemical Strategy for Sustainability.

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

² <https://www.fao.org/food-systems/en/>

³ https://ec.europa.eu/food/system/files/2021-06/f2f_sfpd_coc_final_en.pdf

⁴ https://ec.europa.eu/food/document/download/08709964-ef08-4332-a899-a456bdf0bfff5_en (accessed on 28 Feb 2022)

⁵ <https://fefac.eu/wp-content/uploads/2021/02/FEFAC-Soy-Sourcing-Guidelines-2021-1.pdf>

⁶ <https://fefac.eu/wp-content/uploads/2021/06/FEFAC-Feed-Sustainability-Charter-Report-2021-1.pdf>

3. Sustainability analysis must take a systemic approach

The sustainability analysis of agricultural products should be based on a systemic approach that focuses on overall potential impact. Sustainability considerations should not be based on any prescriptive pre-determined actions, which would be limited to rewarding isolated models and practices perceived as sustainable without measuring their overall potential effect.⁷ The full complexity and diversity of food production that takes place in different environments, under different cultural and societal contexts must be taken into account.

In the EU, it is crucial that Member States retain a central role in driving the transition towards sustainable food systems. Authorities must be empowered to assess sustainability considering local realities.

4. Ensuring predictable decision-making

Food safety and sustainability characteristics are conceptually different, and should not be conflated or handled within the same regulatory processes.

To integrate sustainability analysis and product regulatory evaluation would unnecessarily increase the burden and unpredictability of the EU decision-making process for stakeholders and authorities alike. **The EC should explore the feasibility of a sustainability assessment from the point of view of ensuring predictability, transparency, objectivity, and consistency of future solutions.**

5. Global challenges require multilateral solutions

The initiative's roadmap presents among its policy elements potential new requirements for food imports. Despite the stated intended compliance with international obligations, this unilateral action from the EU raises concerns. We call for an evaluation of the impact of potential trade distortions caused by new import requirements on the EU and its trade partners, in particular lower income countries, to be fully weighed against their real effectiveness in achieving sustainability objectives across all three sustainability pillars.

In pursuing its global sustainability objectives, we encourage the EC to prioritise multilateral agreements. International fora exist to provide the proper framework for multilateral discussions. Taking unilateral action can lead to the adoption of different standards by different countries and the further fragmentation of global governance. This could hamper the EU's access to key export markets, while also driving up costs for EU importers, producers, and consumers.

Unilaterally imposed sustainability requirements for imported goods may also be unfair, discriminatory, and even contrary to the Sustainable Development Goals. Exporting countries have different environmental and socio-economic conditions that drive their agricultural production systems and lead to different pathways to sustainable food production.

Cooperation with trade partners is key to driving up sustainability standards across different markets, while recognising that a one-size-fits-all EU approach will not achieve desired results across the world. **We call for multilateral negotiations to guide the EU's Green Deal ambitions as opposed to unilateral measures that may amount to non-tariff barriers.**

6. Farmers require a complete toolbox to make sustainable food systems a new reality

From producer to consumers, all actors have a role to play in the transition to sustainable food systems. CropLife Europe is committed to continue developing tools that farmers can integrate for sustainable production and healthy diets. By protecting crops from pests and diseases, pesticides and biopesticides play a vital role in allowing farmers to produce safe and high quality food in a sustainable and environmentally friendly manner. Similarly, genetic engineering allows the efficient use of agricultural land and promotes carbon sequestration, soil health, and GHG emissions reductions. New breeding techniques can help accelerate the development of climate-resilient plant varieties, while digital and precision agriculture tools enable the optimisation of input management and decision making for farmers to produce in a more sustainable way.

⁷ <https://publications.jrc.ec.europa.eu/repository/handle/JRC126575>