

# 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.<sup>1</sup> 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. Any form of sustainability assessment must be evidence-based and apply equally to all production models, without distinction.**
- **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.**
- **A future framework for sustainability must enable new agricultural solutions to be developed and adopted by farmers. This requires that science remains at the heart of EU decision making.**

## 1. Lasting change requires balanced and flexible solutions

The concept of sustainability encompasses three pillars that carry equal weight: environmental, social, and economic<sup>2</sup>. An important challenge in policy-making lies in striking the right balance between them. **We encourage the EC to reflect the weight of the three pillars of sustainability in the future proposal for a Sustainable Food Systems framework in a balanced manner.**

Sustained improvement across the three pillars of sustainability can only be achieved when actors have the flexibility to make optimal choices according to their own circumstances. Different routes to promoting sustainability must be considered if fit-for-purpose solutions are to be designed. **In the EU, it is crucial that Member States and local authorities be empowered in driving the transition towards sustainable food systems.**

**Voluntary labelling** applicable to food products of higher sustainability performance can play a role in driving forward sustainability, providing that transparency is ensured and that a scientifically robust method of assessment is established as a reference. Similarly, **minimum sustainability requirements** for EU food products can play a role if they are transparent, evidence-driven, and based on a systemic approach.

## 2. Sustainability analysis must take a systemic approach

The sustainability analysis of agricultural products must be done at a systemic level. Sustainability considerations should not be action-based, limited to rewarding isolated models and practices perceived as sustainable without measuring their overall potential effect.<sup>3</sup> **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.**

**The EC should explore the feasibility of a sustainability assessment from the point of view of ensuring predictability, transparency, objectivity, and consistency of its future approach.** We highlight that food safety and sustainability characteristics are conceptually different, and therefore should not be conflated or handled within the same regulatory process. To integrate sustainability analysis and product regulatory

<sup>1</sup> [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-new-initiative\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-new-initiative_en)

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

<sup>3</sup> <https://publications.jrc.ec.europa.eu/repository/handle/JRC126575>

evaluation would unnecessarily increase the burden and unpredictability of the EU decision making for stakeholders and authorities alike.

### 3. Global challenges require multilateral solutions

The SFS roadmap released in 2021 presented among its policy elements potential new requirements for food imports. Despite the stated intended compliance with international obligations, any such unilateral action from the EC 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 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 be contrary to the Sustainable Development Goals. Exporting countries have different environmental and socio-economic conditions that drive their agricultural production systems, which 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.**

### 4. Innovation is a central element in the transition to more sustainable food production

In the EU, innovation in agriculture has become increasingly challenging while the farmers' toolbox continues to be reduced. **CropLife Europe calls for the future framework to enable new solutions to be developed and adopted by farmers. This requires that science remains at the heart of EU decision-making.**

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, **genetically modified crops** allow the efficient use of agricultural land and promote carbon sequestration, soil health, and GHG emissions reductions. **New Genomic 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.