

# Principles for a Sustainable Food System framework

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The European Commission's (EC) Sustainable Food Systems legislative proposal, expected by the third quarter of 2023, aims to ensure that all foods placed on the EU market become increasingly sustainable. CropLife Europe supports this goal and hereby proposes the following key principles for the future framework to meet this objective.

## 1. Inclusiveness

An EU framework for sustainable food systems should adopt a systemic approach, inclusive of all production models, agronomic practices and products that can contribute to increase sustainability across its three pillars (environmental, social, economic). It needs to take into account the existing agricultural challenges and the full complexity and diversity of food production that takes place in different agronomic environments, under different cultural and societal contexts. Sustainability should be assessed based on overall outcomes, rather than limited to rewarding isolated models and practices without measuring their overall impact.

A systemic approach to trade is necessary to ensure imported goods adhere to requirements that are fair, non-discriminatory and complimentary to the Sustainable Development Goals. Exporting countries have different environmental and socio-economic conditions that lead to different pathways to sustainable food production.

The future framework should recognise and be inclusive of the different approaches adopted by third countries. Cooperation with trade partners is key to driving up sustainability standards across different markets and will deliver greater reach and higher impacts than a one-size-fits-all EU approach.

## 2. Evidence-based

Science should be at the core of a future framework for sustainable food systems in the EU. In line with the better regulation agenda, and to ensure effectiveness of rules and norms, any requirement, criteria or assessment that may apply to operations along the agri-food chain should be guided by scientific knowledge and expertise. Definitions and criteria proposed in the future framework must be informed by best available evidence, under the highest standards of impartiality and transparency. Finally, only well-established concepts recognised by the scientific community should be used in building this framework.

## 3. Supporting innovation

The innovation principle, as defined by DG RTD, states that *“EU policy and legislation should be developed, implemented and assessed in view of encouraging innovations that help realise the EU's environmental, social and economic objectives, and to anticipate and harness future technological advances”*.<sup>1</sup> Keeping pace with developments in sustainable agriculture and food production is key to the transition to more sustainable models of production. In the EU, innovation in agriculture has become increasingly challenging while farmers' toolbox continues to be reduced. A future framework should enable new solutions to be developed in the EU and adopted by farmers and industry players, as they are in other markets. This requires science to remain at the heart of EU decision-making. The framework legislation should take the form of a broad set of enabling and flexible principles and definitions. Disproportionate requirements in sectoral legislation that price innovation out of the EU should be revisited and have their costs weighted against potential benefits.

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<sup>1</sup> [https://research-and-innovation.ec.europa.eu/system/files/2022-07/ec\\_rtd\\_factsheet-innovation-principle.pdf](https://research-and-innovation.ec.europa.eu/system/files/2022-07/ec_rtd_factsheet-innovation-principle.pdf)

#### **4. Aligned with international standards**

International fora provide the proper framework for multilateral discussions. Concepts and definitions incorporated into an EU framework for sustainable food systems should be in line with those developed at multilateral fora over the years. Any unilateral actions could risk the adoption of different standards by different countries or regions 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. Available international risk mitigation policies and measures should be considered.

#### **5. Subsidiarity**

A future framework legislation can only be effective if grounded on the principle of subsidiarity. Actions at EU level should be proposed only where policy objectives cannot be attained through measures decided at national, regional, or local level. Sustained improvement across the three pillars of sustainability requires decision-makers and actors to have the flexibility to make optimal choices according to their own situations. 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.

#### **6. Balance and Proportionality**

The concentration of excessive and unjustified burden on primary producers is a potential risk that must be acknowledged in the transition to sustainable food systems, given their relatively weaker negotiating position in the food value chain. The proportionality principle is key to ensure that measures are fit-for-purpose, necessary, and contribute directly to the political goals. The transition must not allow for unjustified burden to be imposed on any single actor. To this end, mitigation or compensation measures and transition periods should be considered in cases where measures are perceived to be excessively costly for individual actors.

#### **7. Predictability**

Legal certainty is a necessary requirement to allow economic operators to remain active contributors to the transition to sustainable food systems. A framework legislation must support this objective by making rules clear, precise, stable, and predictable. The use of secondary legislation should therefore be limited to justified cases, with a well-defined scope. Furthermore, the framework should be an instrument to enhance legal certainty by reducing the flexibility for secondary standards to proliferate in a way that negatively impacts producers and consumers.

#### **8. Transparency**

The different dimensions of sustainability need to be transparently considered to evaluate trade-offs.<sup>2</sup> Criteria discussion and selection should be done in an open and transparent way, with the involvement of all interested stakeholders. Furthermore, the efforts already made by various actors of the food value chain towards sustainable food systems should be transparently accounted for and accurately communicated to consumers and the society. Transparent indicators and monitoring activities play a key role in ensuring that such efforts are rewarded by the market. Finally, potential environmental benefits that result from agri-food trade need transparent assessment and acknowledgement.<sup>3</sup>

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<sup>2</sup> [Evaluating agricultural trade-offs in the age of sustainable development - ScienceDirect](#)

<sup>3</sup> [Global agricultural trade and land system sustainability: Implications for ecosystem carbon storage, biodiversity, and human nutrition: One Earth \(cell.com\)](#)