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TRANSITIONING TOWARDS SUSTAINABLE FOOD SYSTEMS IN EUROPE

Today's European food systems are shaped by a series of different policies determined at the EU, national and local level. Those policies concern agriculture, food production, trade, food safety, seed legislation, the environment, climate, health, rural development, workers' rights and much more. Very often these policies are developed in isolation and without much dialogue between the policymakers working on them at the different levels. At the same time, despite emerging crises in several areas, there is no coherent approach guiding institutions towards sustainability.

An attempt to develop such an approach was made in 2011 when the European Commission presented its Roadmap to a Resource Efficient Europe, which resulted in a series of discussions and a consultation on the Sustainability of the Food System¹. This European-level process was unfortunately blocked, and no results of it were ever published.

In spite of this, political momentum for the development of a more holistic food policy approach has grown: a number of organisations (CSOs, academics, institutions) are calling for a more integrated, holistic approach to food systems, with many specifically calling for a Common Food Policy.

1 http://ec.europa.eu/environment/consultations/food_en.htm

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INTRODUCTION

This policy briefing paper highlights the need for a systems approach to food and farming in the EU, and offers an analytical framework with which to assess, design and reform EU food-related policies, based on research carried out by the University of Pisa². It also provides recommendations to policymakers to how to transition towards sustainable food systems. With the adoption of the Sustainable Development Goals (SDGs) in 2015, the concept of sustainability has taken centre stage in both national and international fora. The Goals include a significant number of interconnected objectives related to agriculture and food, among which the second SDG, which focuses explicitly on food by seeking to 'end hunger, achieve food security and improved nutrition and promote sustainable agriculture.' Other SDGs seek to address challenges related to the food system: the first SDG focuses on poverty reduction, where agriculture and food have a key role to play; the third SDG focuses on health, and target 3.4 focuses specifically on reducing premature mortality due to non-communicable diseases. Sustainable agriculture plays a central role in achieving SDG 6 on water; SDG 12 on sustainable consumption and production; SDG 13 on climate change adaptation and mitigation and SDG 15 on land use and ecosystems; and sustainable management of fisheries features prominently in SDG 14 on marine resources and oceans.

The SDGs are one of a number of actions taken in 2015 and 2016 on the European and international stage that touch upon food system sustainability. Others among these include the Paris Climate Agreement (COP 21); the UN Decade of Action on Nutrition (2016-2025); the EPSC's European Vision for Sustainability, also known as the Falkenberg Paper; and the Commission's own Communication on Next Steps for a Sustainable European Future.

However, despite these commitments, there is a significant distance between intentions and outcomes and, when seen through the lens of achieving food system sustainability, European food-related policies have a series of weaknesses. These weaknesses can be divided into inconsistencies (policies not pursuing given objectives), incoherencies (policies having conflicting outcomes) and policy gaps (missing policy instruments).

It has become increasingly clear that the distance between intentions and outcomes cannot be explained by examining individual policies, but by their interrelationship in the overall infrastructure that links policies together and aligns their objectives, instruments, and implementation measures. This is particularly true of food, because of its multidimensional nature: food has environmental, social, economic, health, ethical and resilience dimensions.

However, when it comes to food, there is no overall policy infrastructure at the EU level. Many individual policies have an impact on food, but none fully acknowledge its multidimensionality. The General Food Law, for instance, addresses food safety while neglecting nutrition, and regulations encouraging production systems to improve product quality do not link clearly to sustainability.

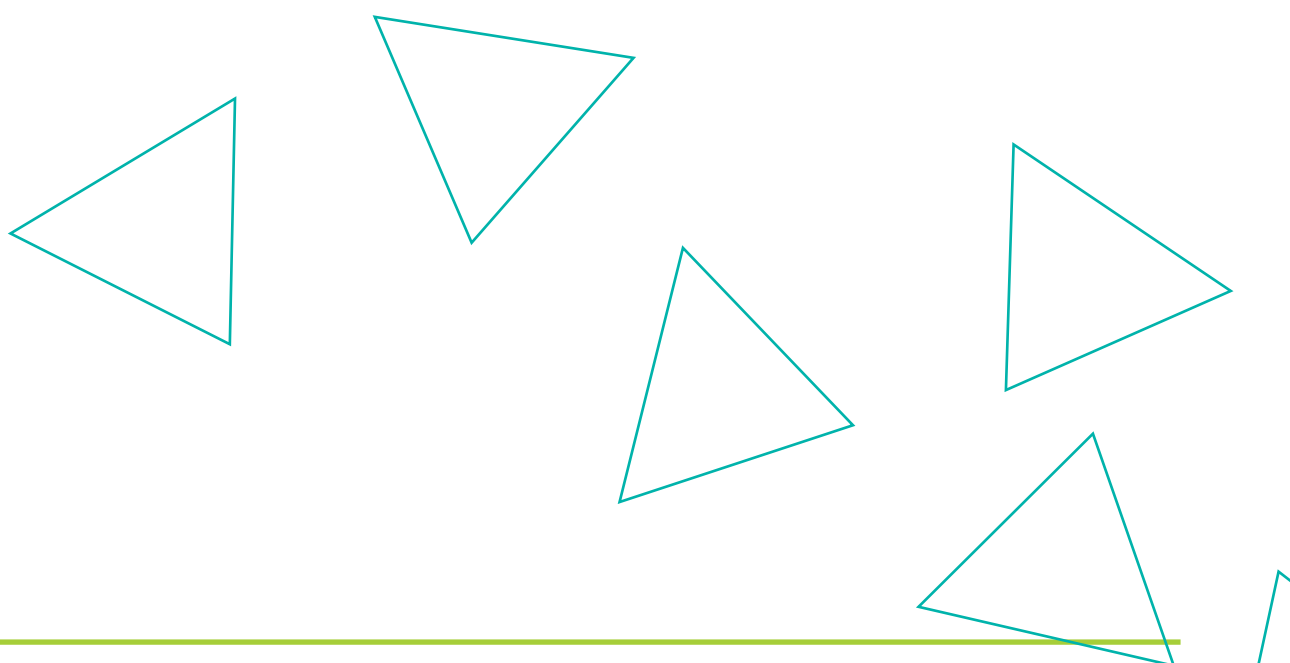
In recent years, there have been increasing voices calling for a fundamental rethinking of EU food policy, and for the creation of an overarching infrastructure of food-related policies in the interest of a transition towards food sustainability. The creation of such an infrastructure requires a radical process that fully takes into consideration the multidimensionality of food, as well as the interdependence of production, distribution and consumption, and their links to broader systems. This process requires reorganising food-related policy instruments around societal goals putting in place instruments to both expedite social and institutional change and overcome barriers to change.

² For details, please refer to: Galli F., Favilli E., D'Amico S., Brunori G. A transition towards sustainable food systems in Europe. Food policy blue print scoping study. Laboratorio di Studi Rurali Sismondi, Pisa, Italy, 2018. ISBN: 9788890896040. https://www.researchgate.net/publication/325248769_A_transition_towards_sustainable_food_systems_in_Europe_Food_policy_blue_print_scoping_study

In this briefing paper we present a framework, developed by researchers at the University of Pisa, on the basis of which to assess, design and reform EU food-related policies. Our aim is to provide a point of entry for a policy-led transition towards food sustainability in Europe.

The system perspective presented allows us to promote both production and healthy, sustainable consumption, which is a key principle of sustainable development. In order to be sustainable, policies should address consumption norms as well as production patterns.

The process proposed for building the transition towards food sustainability is a bottom-up one, that results in the construction of a food policy mix around strategic goals that address policy inconsistency and incoherence, reorganise existing tools and introduce new ones to fill gaps.





2 | TRANSITION POLICIES FOR SUSTAINABLE FOOD SYSTEMS

2.1 | A SYSTEM PERSPECTIVE TO FOOD POLICIES

According to the High-Level Panel of Experts on Food Security and Nutrition, A sustainable food system is *'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'*³

Sustainability is therefore inherently linked not only to present, but also to future food security and nutrition. Policies aiming to be sustainable need to reconcile a range of interests and set priorities. As conditions change over time, priorities may also be subject to change.

For this reason, sustainability requires reflexivity: that is, the ability to review objectives and strategies on a continuous basis, involving a large range of stakeholders. This may be necessary when system knowledge increases, or when solutions to trade-offs, contradictions or conflicts of interest are needed.

A policy for sustainable food systems should therefore be framed as a transition policy. A transition policy is more than an ordinary policy intervention, given that its outcomes are constantly updated and clarified as the policy processes unfold. Intrinsic to the understanding of a transition policy is the fact that it should affect system activities while challenging the identities, practices, interests and values of a wide range of actors and administrative bodies. It should also involve a profound revision of existing regulatory frames and their knowledge base. A transition policy should also acknowledge the existence of barriers to change and system "lock-ins" that constrain the current pathway of evolution of the food system to sustainability (as for example, the disinvestments from intensive livestock farming towards more plant-based production and diets).

2.2 | STRATEGIC POLICY GOALS

Three dimensions of sustainability are often cited: the economic, social, and ecological. These three dimensions cover a vast area of deeply interrelated issues that are relevant to assessing the performance of a food system. Three of these in particular deserve to be emphasised: the importance of health for an understanding of sustainability; the ability of policies to influence change towards sustainability; and the resilience of a system when faced with external variation.

Building on these considerations, researchers at the University of Pisa developed the following six criteria that a food system must satisfy in order to be considered sustainable.

³ HLPE. 2017. Nutrition and food systems. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

Health: system activities should contribute to improving health and wellbeing, and take into account that system activities affect health not only through access, dietary patterns and food quality, but also through occupational hazards and environmental contamination.

Ecological: system activities should contribute to keeping society within ecological boundaries and avoid contaminating the environment.

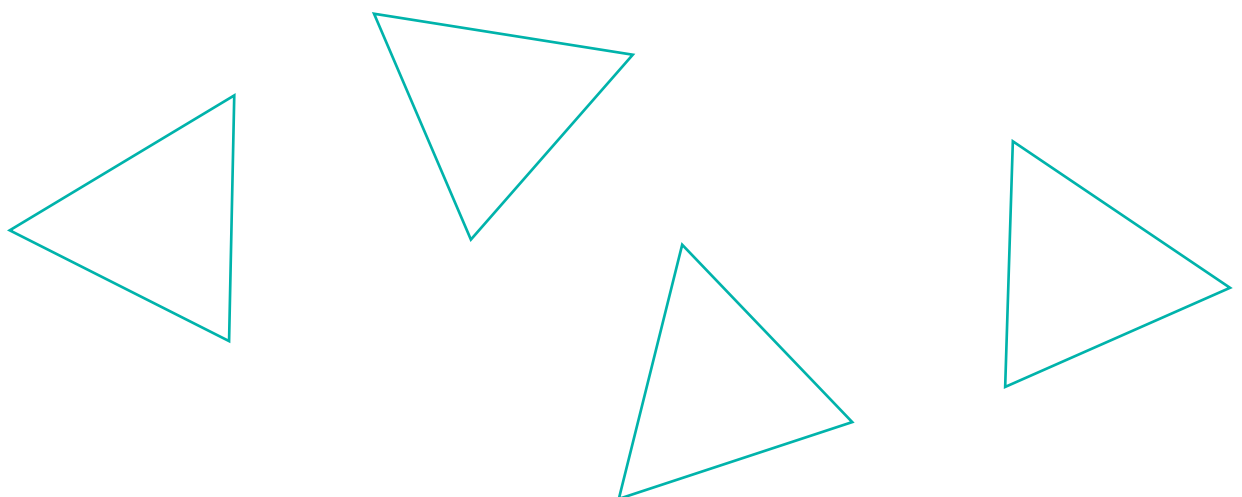
Economic: system activities should ensure that food-related business is economically viable and contributes to healthy economies by creating jobs that provide sufficient income.

Social: system activities should provide access to food that adequately satisfies the socio-cultural needs of all. They should prevent and oppose the creation of inequalities within the food system, ensuring that small farmers have adequate support, ensuring that workers benefit from adequate labour conditions, and delivering assistance to marginalized consumer groups.

Ethical: system activities should produce food that is ethically acceptable (such as with a high level of animal welfare), and promote responsibility among producers and consumers by fostering transparency, encouraging information disclosure and sharing, and incentivising popular participation in business decisions.

Resilience: system activities should increase or maintain diversity in the food system, allocate resources to crisis management, improve knowledge about future possibilities, and improve their own ability to innovate and anticipate change.

Building a strategy for food policy around these six goals requires not only an assessment of the contribution of policies to each dimension, but also an analysis of the direct and indirect links between the dimensions, including synergies, trade-offs, conflicts of interest and ethical dilemmas.



3 | POLICY MIX FOR SUSTAINABLE FOOD SYSTEMS

A policy strategy that addresses a multitude of dimensions and aims to guide a transition needs to satisfy a number of conditions. It needs:

- to integrate a variety of interacting policy instruments;
- revised priorities for existing policies,
- new policies addressing policy gaps, and
- higher-level policy instruments that link policies to common objectives.

For this reason, it is appropriate to adopt the concept of a **policy mix**. Assessing policy involves not only examining the impact of individual policies, but also their consistency with the overarching goals, and at how coherent they are with other policies.

3.1 | THE POLICY TOOLBOX

Policies are implemented through 'policy tools', which can affect the system in a variety of ways. These tools can be divided into the following categories: direct activity regulation, market-based tools, knowledge-related tools, governance tools and strategic tools.

POLICY TOOLS	EXAMPLES
Direct activity regulation tools	Authorisations, prohibitions, limitations, quotas, etc.
Market-based tools	Subsidies, taxes, charges, fees, fines, penalties, liability and compensation schemes, subsidies and incentives, deposit-refund systems, tradable permit schemes.
Knowledge-related tools	Information, communication, research, education.
Governance tools	Shape the distribution of roles and responsibilities among actors.
Strategic tools	Establishing overarching principles, objectives and identifying policy instruments to be mobilized in the pursuit of the objectives.

European law has a significant number of policy tools in place that are relevant to food. The most relevant ones are summarised here.

Direct regulation

European regulations are aligned with the principles set by the Treaty of Rome, including free movement of goods and competition policy (implemented by means of antitrust and cartel policy, merger control, state aid control), both contributing to the realization of the European Single Market. Direct regulation serves to authorise, prohibit or regulate the use of given production or commercial practices or products. Examples of direct activity regulation in the food system regard pesticides, fertilizers, GMOs, novel foods, and packaging. Standards are an important component of direct regulation, and these can be mandatory or voluntary.

Market-based tools

Subsidies

The Common Agricultural Policy sets out a wide range of market-based tools, including the provision of direct payments providing income support to farmers and promoting competitiveness; agro-environment-climate payments given to farmers who pledge to introduce environmentally friendly farming practices; and compensation payments granted in the case of natural disasters.

Trade

EU trade policy covers trade in goods and services, and matters such as the commercial aspects of intellectual property rights and foreign direct investment. Agricultural commodities and food products are an important component of European foreign trade, and trade agreements can affect the food system in a substantial way. Trade related policy tools also include several types of restrictions to trade, such as import tariffs, import quota and non-tariff barriers (e.g. safety standards and labelling requirements).

Food assistance

Food assistance refers to financial and in-kind support to the most deprived. The European Union provides a food distribution program, and in 2014 established a Fund for European Aid to the most deprived (FEAD).

Public procurement

EU public procurement rules aim to provide contracting authorities with the opportunity to pursue the best procedures, requirements and criteria for environmental, social and innovation objectives. Food is relevant to public procurement in relation to schools, hospitals, public employees' canteens.

Food taxation

Food taxation measures have been introduced in several countries to reduce the consumption of unhealthy foods, such as those containing high levels of fats, sugars and salt. Taxation is intended to impact upon consumption levels as a result of people's unwillingness to pay a premium for a product.

Commercial licensing

Commercial licensing can shape the food environment (which is a combination of surroundings, opportunities and conditions that influence people's food and beverage choices, in such a way as to support policy goals) by altering the accessibility to given categories of food in a certain geographical area. This includes municipalities using zoning to exclude or include specific types of food business (e.g. to exclude fast food or to support the establishment of farmers' markets, or to identify areas where access to fresh food is limited).

Knowledge-related tools

Information, communication, advertisement

All policy measures should aim to provide adequate information to consumers and citizens about food. This heading includes issues related to the regulation of food advertising, such as minimising the exposure of children to adver-

tising for 'unhealthy' food, or regulating the use of health and nutrition claims, which should be based on evidence.

Labelling

Labelling rules regulate the information on food labels to consumers. Labelling rules can be an important food policy tool since they require products to advertise their origin, methods of production and nutritional content to consumers.

Food education

Nutrition education aims to help people amongst other things to feed their families well, prepare healthy foods and meals, and resist poor food choices. Food education policies support strategies to reach a variety of audiences and contexts through various communication channels.

Nudging tools

Nudging tools are tools that seek to steer individuals' choices by means of indirect suggestions and changes in the default options available to them. These can take the form of information (such as feedback, warnings, reminders) or can modify the physical contexts of choice, (e.g. by changing the positioning of products in shops). Nudging tools can be used to modify the **food environment**.

Governance tools

All public-private-civic interactions that address policy issues related to agriculture and food policy can be considered to be governance tools. Governance can foster vertical and horizontal integration, involve citizens in decision making and strengthen joint strategic reflection.

Companies use Corporate Social Responsibility (CSR) to integrate social and environmental concerns into their business operations on a voluntary basis, and European legislation regulates this in various ways.

Strategic tools

Strategic tools are those used to define the principles, goals, and priorities with which to chart a future direction of action. These types of tools are necessary in order to ensure that overarching objectives remain central, and that policies are well integrated. Strategic tools can also give guidance on how to identify weaknesses and gaps in the existing regulation and provide recommendations for change through, for instance, framework conventions, guidelines, strategic action plans, and roadmaps.

At the EU level, the Rural Development Plans give Member States the possibility to coordinate the tools of the Rural Development Policy to region-specific objectives. However, strategic tools can be implemented at any governance level to foster integration between related policies, as has been demonstrated by the success of urban food strategies.

3.2 | THE EFFECTIVENESS OF THE POLICY MIX

In a sustainable food system, resources, actors and activities align dynamically around sustainability principles. The system is resilient, and when perturbations threaten to affect the performance of the system, feedback mechanisms re-establish the alignment.

According to a systems approach, consumption and consumers fully contribute to system outcomes: consumption and consumers are internal, rather than external, to the system. Policies should therefore impact consumption as well as production.

Policy tools influence the behaviour of food system actors by impacting on supply and demand in various ways.

Supply-side policy instruments act upon producers, processors and distributors by modifying the conditions that determine the prices and quantities supplied. The EU uses a wide range of supply-side tools, such as cross-compliance and greening payments under the Common Agricultural Policy, and quality schemes for agricultural products.

In a strategy for sustainable food systems, principles grounded in agroecology, social responsibility and fair trade could allow for the alignment of supply-side instruments around sustainability goals.

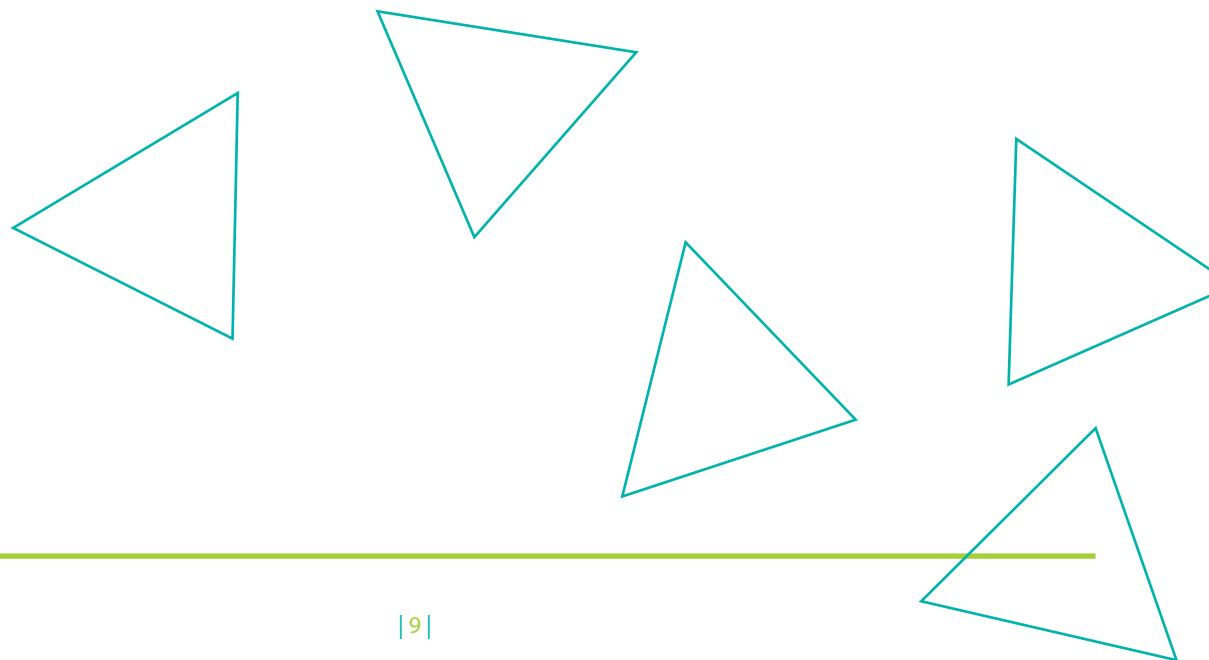
Demand-side instruments in this context remain insufficiently implemented. **Demand-side** policy instruments affect the conditions of demand, such as taxation measures on unhealthy foods, or the establishment of dietary guidelines. Appropriate tools promoting sustainable diets would identify the link between health and environmental outcomes of consumption and would help setting the appropriate policy mix to address it.

Having both supply- and demand- side instruments integrated in policy mixes would enable policy makers to think holistically, identifying dynamic effects within the system. Using supply- and demand-side policy instruments could also affect the food environment.

Taking the food environment into consideration allows for the use of a much larger set of policies, ranging from commerce authorizations to urban garden allotments, disease prevention and public procurement.

In order to build an appropriate policy mix, it is necessary to analyse the impacts of policy tools on a food system's activities and outcomes carefully.

The transition to a sustainable food system requires the alignment and adjustment of a broad set of policy instruments that influence demand, supply and the food environment, as well as the skills, roles and responsibilities of the actors in the system. This transition requires time, and considerable effort in both top-down (rules, incentives and reorganization of governance) and bottom up directions, particularly from civil society, consumers, and local administrations.



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SUMMARY OF POLICIES ASSESSED ON THE BASIS OF WHICH THE FOOD SYSTEM APPROACH WAS TESTED

The University of Pisa study analysed ten policies with regard to their consistency with sustainability goals, their policy tools, their coherence with other policies, their impact on sustainability and the policy gaps evident in their implementation.⁴

Greening of the Common Agriculture Policy

The policy concerns the mandatory greening of some of the financial support to farmers in order to promote crop diversification as well as the maintenance of permanent grassland and Ecological Focus Areas (EFA). It is consistent with ecological, social, resilience and economic goals. It is coherent with similar instruments under the Common Agriculture Policy, but its impact remains low due to the numerous derogations permitted. Overall, the policy contributes weakly to sustainable food systems. A radical approach is necessary to meet environmental commitments.

Nitrates Directive

The policy aims to reduce nitrate pollution from agriculture sources. The regulation places direct restrictions on polluting agricultural activities and supports ecological goals. In addition, by promoting farmers' responsibility and the maintenance of natural resources, it also supports ethical and resilience goals. The regulation is coherent with other environmental policy instruments, but the links to other water-polluting sectors are missing. Clearer strategies to foster different development models are needed.

Seed Marketing Directives

The EU directive regulates the marketing of seeds and plant reproductive material to protect consumers and farmers from fraud and ensure a high standard of plant health and quality. The policy has improved food security by promoting the cultivation of specific crops, but has been based on industrial production criteria, reducing crop diversity and adversely affected the leverage of small farmers, which has lowered the overall system resilience. To overcome these shortcomings, to implement farmers rights on seeds and integrate biodiversity protection, policymakers might start a dialogue on the coherence with other policies, such as agriculture, consumer safety, patents, biodiversity and health.

⁴ For details, please refer to: Galli F., Favilli E., D'Amico S., Brunori G. A transition towards sustainable food systems in Europe. Food policy blue print scoping study. Laboratorio di Studi Rurali Sismondi, Pisa, Italy, 2018. ISBN: 9788890896040. https://www.researchgate.net/publication/325248769_A_transition_towards_sustainable_food_systems_in_Europe_Food_policy_blue_print_scoping_study

Common Market Organisation

The policy provides a safety net for agricultural markets through a variety of supply-side and demand-side tools. Its primary goal, based on the explicit link between agriculture and EU competition law, is to reconcile the free circulation of agricultural products with market support measures through a system of derogations. Non-economic goals are not primary concerns. However, the question of whether the pursuit of sustainable food systems is compatible with the free circulation of commodities remains.

Food Safety and Hygiene Policy

The policy provides the legal framework for food and feed safety from production to distribution, which is central to a sustainable food system and relevant to all the overarching goals. The policy has delivered high safety standards and an effective functioning of the internal market, although small food businesses have been penalised (in particular regarding the implementation of the Hygiene package). The policy is currently undergoing an evaluation at the same time as a growing number of citizens are expressing mistrust in science-based systems (especially in relation to the pre-market authorisation process for products such as pesticides, GMOs and novel foods).

Food and Drink Labelling Policy

The policy sets out mandatory minimum information requirements for food products used in the food chain and for all foods for final consumption. The policy is central to sustainable food systems and relevant to all overarching goals. In the future, the policy could lead to a strategic coordination of labelling efforts with other knowledge-based policies to actively shape the food environment in favour of nutritional, healthy and sustainable diets.

Food Quality Policy

The policy provides tools to help highlight the qualities and tradition associated with registered products; establishes criteria for organic products and raises the awareness about the quality of these products. The EU quality schemes (PDO, PGI, TSG) support economic, social and resilience goals primarily through the valorisation of a variety of agricultural products, but they have potential for a broader impact. They can be burdensome and expensive for smaller producers and only a minority of EU citizens recognizes the logos associated to these schemes. The schemes could support sustainable food systems by explicitly integrating non-economic goals into the development of their codes of practices.

Public Food Procurement

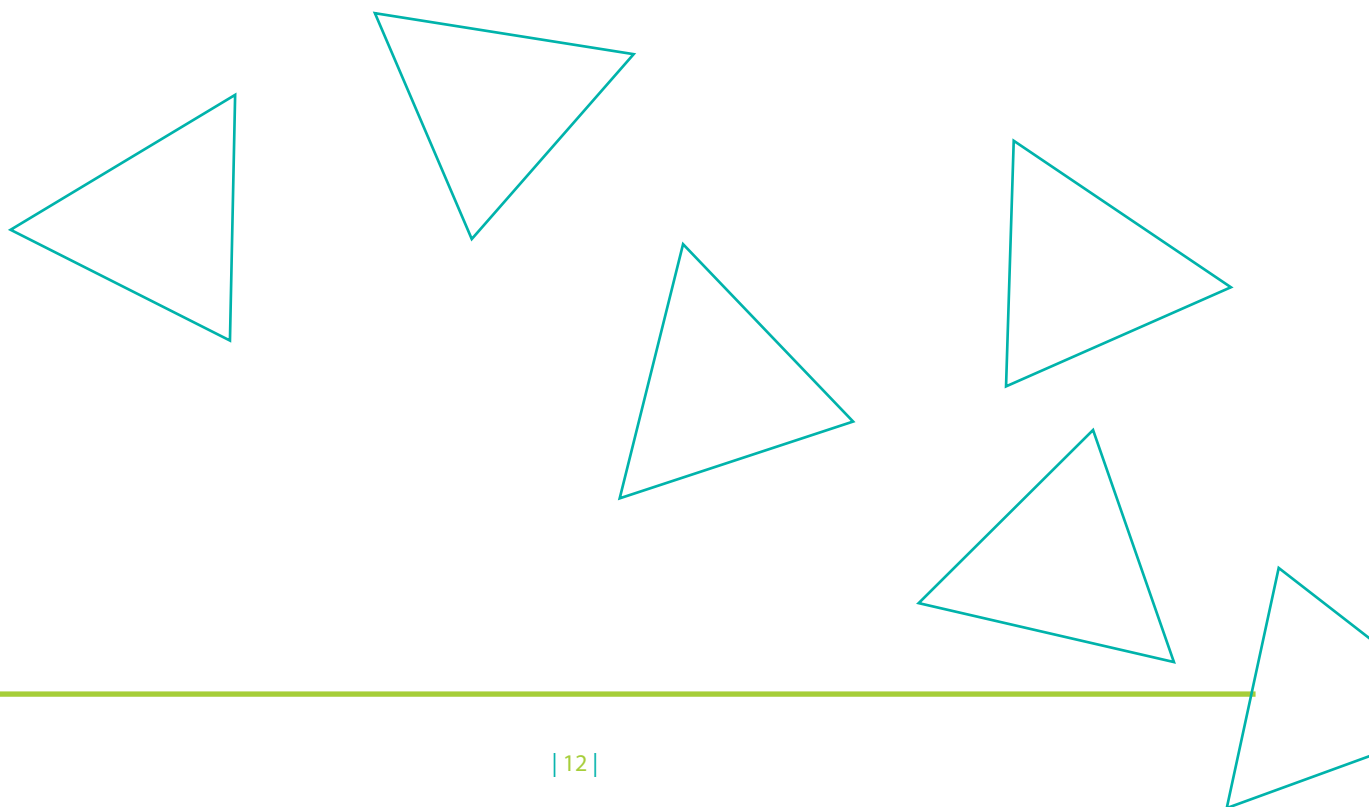
Public procurement for food products regulates the procedures by which public entities acquire contracts for food products or catering services. With the use of Green Public Procurement criteria, public entities can purchase goods and services taking into account not only price, but also sustainability. Due to its voluntary nature, uptake of Green Public Procurement has been low. The scale of public procurement activity may however support and stimulate innovation by improving the availability and price of sustainable food options.

Competition Policy

The policy is an important element of the treaties establishing the European Union and is based on the principle of fair competition. Under the Common Market Organisation and Unfair Trading Practices policies, the agriculture sector is accorded certain derogations, but it often seeks more flexibility through competition law. Public procurement is another policy that is constrained by competition law. The policy has changed the structure of the producers' side of the agri-food chain, which is atomised and weak. The policy needs to enhance its efforts to counteract these imbalances created by high competition in the food sector.

Tackling Unfair Trading Practices

The draft directive aims to reduce unfair practices perpetuated by large retailers and food suppliers against weaker trading partners in the food chain. The policy will encourage voluntary supply chain initiatives, the development of EU-wide good practice principles and minimum enforcement standards. It is expected to have an impact primarily on social and economic goals through ensuring that small businesses benefit from fairer treatment and adequate economic returns, which in turn can improve transparency and resilience of food systems. In the future, the policy may benefit from developing links to EU competition policy and the directives on unfair business practices and consumer contracts.



5 |

THE FINDINGS

The analysis of food-related EU policies has highlighted **significant inconsistencies, incoherencies, and policy gaps**. It has shown an imbalance between supply-side tools and demand-side tools, and that the concept of food environment is not a clear policy focus.

On the basis of the comparative assessment of the selected policies, it is possible to draft some **general observations** concerning the potential and limits of these instruments in contributing to a sustainable food system:

- *Impact assessments carried out on the selected policies have assessed their pertinence with respect to a variety of sustainability goals, but very rarely all goals.*
- *All the selected policies were assessed in some form for their economic impacts. The social dimension of sustainability was also represented to varying degrees. The ecological impacts were present in almost all policy assessments, particularly where the policy objective was environmental protection.*
- *With regards to health, the assessments confirmed that the health dimension of the selected policies was insufficiently integrated, despite the provisions of Article 168 of the Treaty on the Functioning of the European Union. When considered under food and agriculture, its focus was often limited to food safety.*
- *The ethical dimension, related to transparency, information disclosure and corporate responsibility, was rarely considered. This goal, however, often emerges as a cross-cutting concern of the food system. The resilience goals had few explicit references in the literature.*

Based on the assessment of the selected policies the following **cross-cutting conclusions** emerged:

- **Policies were in some cases found to be not achieving their main objectives.**

In the case of the Greening the Common Agricultural Policy, the supply-based tool has negligible environmental and economic impacts due to its broad and non-selective application on agricultural land in the EU. The policy design could have delivered a stronger measure that focuses its resources where it has the greatest impact.

- **Policies' consistency with all the overarching goals is limited.**

Some policy instruments were found to be successful in reaching their objectives but were not consistent with other sustainability goals. The Food Quality Policy, for example, developed certification schemes that valorised traditional products based on transparency and a fair return, but in their initial design omitted explicit reference to environmental or nutritional criteria.

Certain other policies were found to have delivered on their objectives, but at the cost of negatively affecting other sustainability goals. The Seed Marketing Directives succeeded in establishing a market for regulated seed, but at the cost of reducing genetic diversity, which in turn adversely affects ecological, ethical and resilience goals.

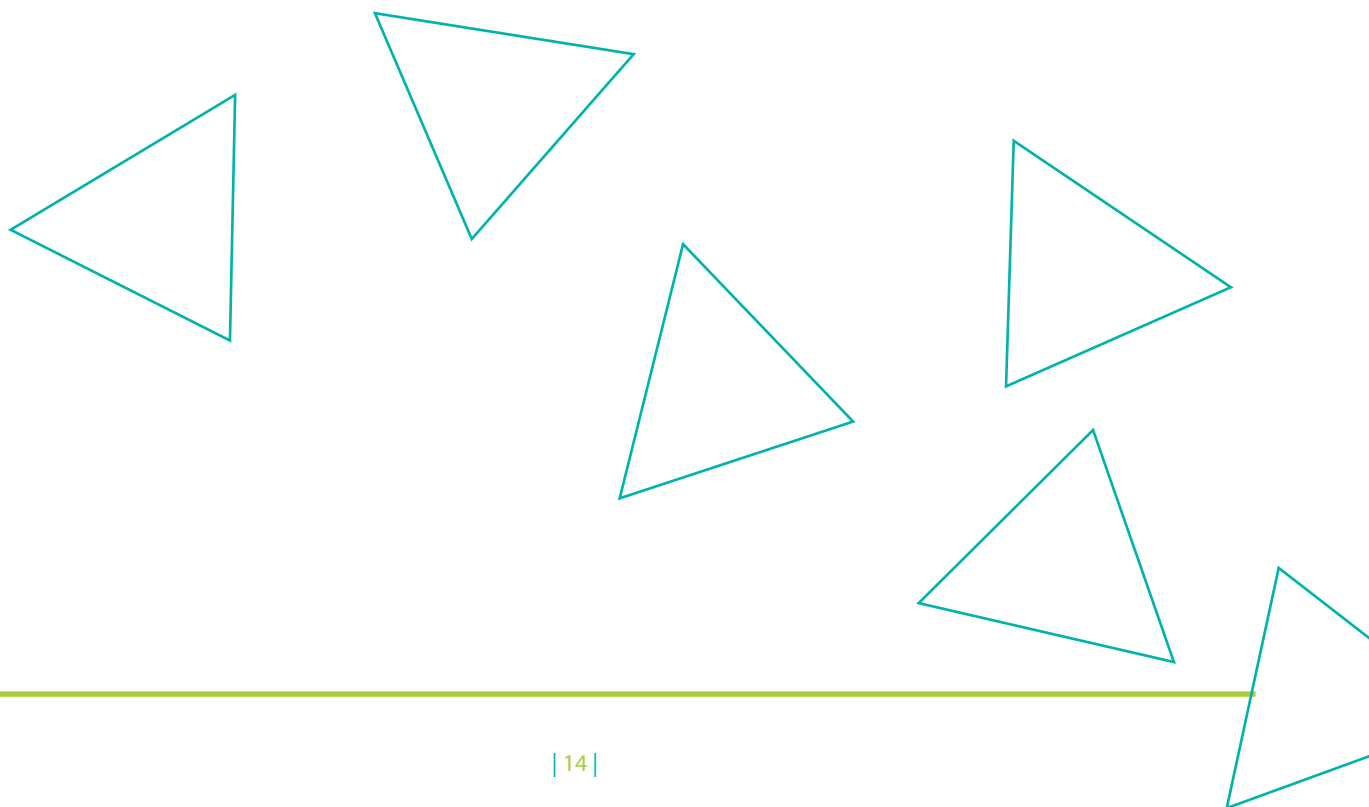
- **Policies may in principle be consistent with all overarching goals but are limited in terms of implementation**

Even when policy instruments are able to contribute to all the objectives of a sustainable food system, obstacles can arise that limit implementation. In the case of Sustainable Public Procurement, where the public food procurer is theoretically in the best position to choose the healthier and more sustainable option for its citizens, the obstacles can be disputes over terminology of what "sustainable" means or the adoption of new procedures, which hinder the civil servants to adopt and apply the correct tender procedures of the best criteria for sustainable procurement.

- ***Policy instruments have not been designed in a systemic and integrated approach.***

While all the instruments analysed have the potential to contribute to a sustainable food system, their implementation remains isolated from or insufficiently coordinated with other instruments. For example, there are explicit references to coordination between Competition policy and the Common Market Organization regulation, and between Nitrates Directive and CAP Cross Compliance, but complementarities are insufficiently enforced.

The transition towards a sustainable food system may gain momentum if relevant instruments and tools are directly implementable by other actors at national, regional or local level. If regional governments made active use of the tools provided under the Nitrates Directive or Public Procurement, their impact would also be better targeted to reflect local specificities.



6 |

RECOMMENDATIONS

The achievement of a sustainable food system requires a fundamental revision of the current policy infrastructure. Subsidiarity does not provide an adequate reason for the European Commission to backtrack on its previous commitment to deliver a strategy for a sustainable European food and farming system, especially since “flexibility” for member states in practice means that they often go for the lowest denominator. For Friends of the Earth Europe, IFOAM EU, EPHA and Slow Food, this means that:

- *There is a need to build a food policy framework at the EU level around strategic tools aimed at the integration and coherence between policies, the reorganization of existing tools, and the introduction of new instruments when necessary in order to delineate the transition towards sustainable food systems.*
- *The new EU policy framework needs to reflect and pursue economic, social, ecological, health, ethical and resilience aspects simultaneously.*
- *A new EU policy framework should balance direct regulation, market-based, knowledge-related, governance and strategic tools into an effective policy mix to systemically address all the factors that are blocking the system in its current unsustainable pathway.*
- *Having both supply- and demand- side instruments integrated in policy mixes would enable policy makers to think holistically, identifying dynamic effects within the system. Using supply- and demand-side policy instruments could also focus explicitly on the food environment.*
- *The new policy infrastructure should develop coordinated governance mechanisms spanning local, regional, national and European levels. It should create an enabling framework for the increasing number of initiatives at regional and local levels, supporting the flourishing of alternative food systems.*
- *Agroecological production and value chain approaches offer promising avenues to comprehensively pursue the above-mentioned criteria of sustainability and should therefore be a focus in an overarching strategy of this sort.*
- *Taking the food environment as a policy focus allows to mobilize a larger set of policies, ranging from commercial licencing to urban garden allotments, disease prevention and public procurement. Key actors in the food sector, such as urban municipalities should be recognised as key food policy actors.*

A promising proposal to enable such development was made in an opinion by the European Economic and Social Committee (EESC), which centred on creating in the short or medium-term a cross-sectoral and inter-institutional task force involving various Commission Directorate Generals and other EU institutions. This task force would be responsible for developing an Action Plan on Food Sustainability, with the aim of helping the EU implement food systems-related SDGs. The Action Plan should be developed through a participatory process involving stakeholders across the food supply chain, civil society and researchers.

The EU ‘Sustainable Food Scoreboard’, an initiative led by the International Panel of Experts on Sustainable Food Systems (IPES-Food), will be developed during the EU Food and Farming Forum (EU3F)⁵ taking place in Brussels in May 2018. The scoreboard aims to present a concrete set of policy recommendations coupled to a timeline, aiming to promote policy alignment at different levels of governance and a transition towards a food policy for Europe.

⁵ <http://www.ipes-food.org/eu-common-food-policy>

In relation to the reform of the EU Common Agricultural Policy (CAP), one of the key policies affecting EU food and farming, the above-mentioned recommendations would entail:

- A much stronger integration of health, ethical and resilience objectives into the policy, going beyond the production side. This means, concerning:
 - 1. **Health** - the new CAP should take a comprehensive approach towards human health protection and promotion, by pursuing objectives in the areas of occupational and environmental health, such as air quality, contributing to healthy and sustainable eating and drinking patterns, reducing antibiotics use and promoting food quality, where the quality of a food product is defined by the sustainability of the system that produces it;
 - 2. **Transparency and governance (ethical)** - the new CAP should refer to transparency in the process of agreeing on the CAP strategic plans and the involvement and participation of, in particular, civil society in the process. It also means that a greater number of actors, rather than only agricultural institutions and specialists, should be involved in determining the new policy;
 - 3. **Resilience** - the CAP should have strong objectives concerning the diversity of genetic resources, soil quality, mixed farming, but also possibilities for farmers to make a fair living, rather than promoting specialised, monoculture farming and land concentration in the hands of few;
- Ensuring that Member States are required to deliver on all objectives set by the EU framework on an equal basis as well as ensuring that they dedicate an adequate budget to the fulfilment of the health, resilience and environmental objectives;
- Ensuring that the new CAP is results oriented and that the payment system is geared towards delivering public goods, by organising the proposed CAP tools (CAP support plans, direct payments, rural development interventions, etc.) around the above objectives and to ensure coherence with other food-related policies;

Ensuring that the implementation of environmental (air and water quality, climate), animal welfare, biodiversity, antibiotics use legislation is linked much more strongly to the granting of direct payments. This would mean strengthening both compliance with mandatory standards and minimum requirements in those areas and ensure that complementarities among policy instruments are not only foreseen but also enforced.

WHO WE ARE

Friends of the Earth Europe (FoEE)

Friends of the Earth Europe is the largest grassroots environmental network in Europe, uniting more than 30 national organisations with thousands of local groups. Friends of the Earth Europe campaigns for sustainable and just societies and for the protection of the environment. FoEE is the European arm of Friends of the Earth International which unites 74 national member organisations, some 5,000 local activist groups, and over two million supporters around the world.

European Public Health Alliance (EPHA)

The European Public Health Alliance, Friends of the Earth Europe, IFOAM EU and Slow Food gratefully acknowledge financial assistance received to prepare this publication. The contents of this document are the sole responsibility of the above mentioned organisations and cannot be regarded as reflecting the position of their funders.

Slow Food

Slow Food is a global, grassroots organization, founded in 1989 to prevent the disappearance of local food cultures and traditions and counteract the rise of fast life. Since its beginnings, Slow Food has grown into a global movement involving millions of people in over 160 countries working to ensure everyone has access to good, clean and fair food. Our goal is to fix the broken food system by moving toward diversified agroecological food systems. We envision a world in which all people can access and enjoy food that is good for them, good for those who grow it, and good for the planet.

IFOAM EU

IFOAM EU is the European umbrella organisation for organic food and farming. We fight for the adoption of ecologically, socially and economically sound systems based on the principles of organic agriculture – health, ecology, fairness and care. With more than 190 member organisations our work spans the entire organic food chain and beyond: from farmers and processors, retailers, certifiers, consultants, traders and researchers to environmental and consumer advocacy bodies.

ACKNOWLEDGMENT

The European Public Health Alliance, Friends of the Earth Europe, IFOAM EU and Slow Food gratefully acknowledge financial assistance from the European Union, Health and LIFE Programmes. The contents of this document are the sole responsibility of the above mentioned organisations and cannot be regarded as reflecting the position of the mentioned funders.

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Published: May 2018