



Slow Food Feedback on the EU Inception Impact Assessment: Sustainable food system framework initiative

26 October 2021

Slow Food welcomes the European Commission's initiative on the Sustainable Food System (SFS) Framework and the possibility to comment on it as we believe that a strong legal framework is necessary to drive the comprehensive transition towards sustainable food systems that is needed to address some of the existential threats we face.

Slow Food has been calling for, and has greatly contributed to developing the idea of, [a Common Food Policy](#) for several years, which entails shifting the focus on agriculture to a food systems approach that encompasses the entire range of actors and activities involved in the production, processing, distribution, consumption and disposal of food products.

In 2019, Slow Food, together with over 25 other civil society organizations, [called for](#) the Farm to Fork Strategy to pave the way for the Common EU Food Policy and bring coherence between all policies affecting food (environmental, agriculture, trade, health, fisheries, etc.) and in line with the EU's sustainability objectives. We believe that certain elements of the European Commission's proposal on the SFS Framework have great potential to bring forward the Common Food Policy.

General comments

To account for the complexity of our food system, **sustainability** should be considered in a holistic way going beyond the environmental, health, and economic dimensions. In order to be sustainable, food systems should meet criteria across 6 dimensions¹:

- **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

¹ "Transitioning towards sustainable food systems in Europe" Policy Brief. <https://www.slowfood.com/wp-content/uploads/2020/12/Transitioning-towards-Sustainable-Food-Systems.pdf>



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.

Slow Food shares the Commission's assessment of key **drivers of unsustainability in our food systems**, in particular the **lack of incentives** to produce sustainable foods/ place sustainable food on the EU market, **the (un)affordability of sustainable foods**, the fact that **negative externalities** are not accounted for, and the recognition that "**dietary behaviour**" is influenced by various factors including social, economic and cultural.

We also agree with the direction of the SFS Framework's objectives and sub-objectives, in particular, the objective to produce food within the **planetary boundaries**, to address the **entire food system**, going beyond the linear food supply chain approach, and to create **favourable food environments**.

Creating enabling food environments means ensuring that foods, beverages and meals that contribute to sustainable healthy diets are the most available, accessible, affordable, pleasurable and widely promoted (see joint policy brief on Food Environments²). As stated by the EU's group of chief scientists, binding policies, such as regulation and fiscal measures, tend to be the most effective interventions and must be the main drivers of change to healthy and sustainable food systems operating within planetary boundaries. Voluntary commitments and self-regulatory initiatives should only be seen as complementary drivers and never replace regulation.³

Some considerations to strengthen the proposal on the SFS Framework

We believe that an **additional objective** of the SFS Framework should be to **drive the transition towards diversified agroecological food systems**, based on farming agrobiodiversity, with lower dependency on external inputs, stimulating social relationships and short-supply chains, to build long-term healthy agro-ecosystems and secure livelihoods. To promote the development of agroecology, the SFS Framework must enable EU food policies to 1) Support farmers in their transition to agroecological food production, and 2) Make agroecological food accessible to all Europeans.

A second concern that we have with the IIA on the SFS Framework is that it seems to take a "**product-based approach**" to sustainability, rather than a "**food systems approach**" by stating that "the overall objective is to ensure that all foods placed on the EU market increasingly become sustainable". Instead, the SFS Framework must take a comprehensive and cross-cutting food systems approach, and address food production, processing, distribution, and consumption, within and outside the EU, and recognise these are all parts of a complex system which must be governed holistically.

Finally, we agree with the Farm to Fork's aim to empower citizens through improved labelling, to allow them to make better choices. However, sustainability labelling should not become an excuse not to **have transparent labelling** about the ways in which foods are produced, and it is critical that

² Policy Brief "Food Environments and EU Food Policy: Discovering the role of food environments for sustainable food systems" <https://www.slowfood.com/wp-content/uploads/2021/10/Food-Environments-for-SFS-EU-FPC.pdf>

³ Scientific Advice Mechanism, Group of Chief Scientific Advisors (2020) Towards a sustainable food system. Scientific Opinion Nr. 8. European Commission



consumers continue to be able to identify food produced with gene-editing such as “New Genomic Techniques”.

Policy Option 4:

Given the urgency with which we need to act, and the depth of the transformation that is needed to address the environmental, social, and health crises Europe is facing today, **Slow Food supports policy option 4** (a new comprehensive framework law on the sustainability of the EU food system) as the only credible way forward to respond to the multiple challenges and opportunities linked to reforming the European food system.

Building on Option 4, the SFS Framework must set a clear vision and direction of travel for EU food systems and driving an ambitious, just and systemic transition to environmentally-sound, fair and healthy food systems. In addition, a strong EU governance framework should be established to implement the SFS Law, and enforce the obligations it contains, and ensure coordinated multilevel action, and monitor and evaluate the progress made in achieving a sustainable EU food system.

We thank you in advance for considering our comments and remain at your disposal for any question you may have.

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