COPA AND COGECA POSITION ON THE FARM TO FORK STRATEGY

Brussels, 16th March 2020

Farm to Fork Strategy

copa cogeca

european farmers european agri-cooperatives

Introduction

The Commission's Communication on the European Green Deal approach has several axis that are very much linked to the agricultural sector. This approach is an opportunity but is also a challenge and raises various concerns. These aspects must be carefully analysed and considered. European farmers are key to managing the transition. The Farm to Fork Strategy will strengthen their efforts to tackle climate change, protect the environment and preserve biodiversity.

It is fundamental that the policy formulation and implementation supports farmers and their cooperatives' economic sustainability, improves the functioning of the markets while contributing to a more economically, environmentally and socially sustainable agri-food sector. It must be recognised that there are numerous production methods which bring additional benefits from a sustainability point of view.

As this initiative will have significant economic, social or environmental impacts, it is imperative that the Commission carry out impact assessments before taking any political or regulatory decision on establishing targets such as to reduce the use of pesticides, as well as the use of fertilisers and antibiotics. This will affect EU production.
The Farm to Fork strategy for sustainable food must take into account all three pillars of sustainability (economic, social and environmental) in this broader discussion. This is the only way to recognise the contribution of agriculture and of rural areas to food and feed production as well as biofuels, textiles and reforestation. Agriculture and forestry can provide long-term solutions.
Yet the current discussions often neglect these social and economic aspects and forget to include the human factor of farmers' work. Any future strategy must follow a comprehensive agri-food chain approach and be based on independent science-based policymaking. This will support investment through predictability and consistency.

European farmers and agri-cooperatives should be equipped with the right toolbox which should be developed hand in hand with cutting-edge scientific progress.
Therefore, European farmers and agri-cooperatives must be given available, safe, effective and affordable tools.

Increased investment into research and innovation at EU level may allow European farmers and agri-cooperatives to go further with the environmental sustainability of their production and should be always encouraged.
While the Farm to Fork Strategy may provide new opportunities for operators in the food value chain, the Commission needs to explain whether "new technologies and scientific discoveries", will include New Breeding Techniques, following the recent European Court of Justice's decision. The Commission must also consider the potential of these techniques to improve sustainability along the food chain.
Furthermore, it should be clarified how we are going to significantly reduce the use of pesticides and fertilisers when there is no mention of a list of "credible and realistic alternatives" in the Green Deal Communication.

In this context, the next legislative proposals should contribute to reducing the competitive disadvantages that exist today in relation to production methods outside the EU and protecting European high standards that are internationally recognised as among the best in the world. Moreover, these proposals should be based on the solid science-based risk analysis paradigm and the precautionary principle. We cannot have food security without food safety.
Furthermore, European production standards must be respected when it comes to trade and imports from third countries. Imported food that does not comply with relevant EU environmental standards should not be allowed on EU markets in order to maintain a level playing field.

Trade agreements must ensure that the parties involved participate actively in promoting sustainable development principles. International standards that are in line with European environmental and climate ambitions for sustainable growth must also be guaranteed. Furthermore, in order to ensure a global transition to sustainable food systems, these agreements should make the Paris Agreement on Climate Change and compliance to this as essential and binding elements.

Reduction in the use of pesticides:

Today, European farmers and their cooperatives are confronted by multiple threats when safeguarding their crops. These threats include pests, diseases and weeds, some of which are exacerbated or created by the effects of climate change at global level.
As part of their jobs, farmers may have recourse to pesticides to grow healthy crops on competitive terms, provide safe food, feed and non-food agricultural products, safeguard the environment and ensure that consumer demands are met at the same time. Without a safe and effective toolbox to hand, especially where farmers already use low levels of pesticides, it is scientifically proven that yields will be reduced, and therefore food security in the future will be threatened.

We need to be able to replace those active substances that have been assessed negatively by EFSA with sustainable alternatives that will assure farmers safe and effective production, through a science-based decision-making process. These alternatives should be seen as a combination of solutions, such as biocontrol technologies, innovative agronomic practices, digitalisation, resilient varieties or research into new agricultural markets. Research and innovation must aim to find new tools and practices that are directly available and applicable on field for farmers, helping farmers to reduce chemical inputs and find alternative and sustainable pest management solutions.

By applying Integrated Pest Management (IPM), farmers are already avoiding an excessive use of pesticides and increasingly moving towards low-risk substances and selective crop protection techniques. They combine various agricultural practices to reduce the impact of agriculture on the environment, including crop rotation, implementation of resistant cultivars, soil management, seed protection, etc. Nevertheless, pesticides will remain an essential element in IPM.

Reduction in the use of fertilisers:

Crop yields are not really predictable before crops are harvested. For this reason, there may be arable land with either over or under fertilisation. The aim should be to fertilise crops as accurately as possible. Precision and digital farming benefit agricultural activities by optimising the application of fertilisers and plant protection products. That is why decision-support and precision-farming tools make it possible to improve the efficiency of crop fertilisation and provide both environmental and economic benefits. An objective of reducing dependence on fertilisers is not an appropriate indicator to promote precision fertilisation. Rather than setting a specific goal on reducing fertilisers, the use of advisory services or programmes which target the nutrient efficiency on individual farms could be a good tool to use. Such services should be encouraged since they have evidently increased efficient use on farms.

The target to reduce dependence on fertilisers should not be legally binding for farmers. The “one-fits-all” approach that sets a specific quantified European reduction target percentage for fertiliser use is not appropriate. This is mainly due to the varying production types and significant differences in farming practices between Member States (e.g. fertiliser use per hectare and the different fertiliser use efficiency). A single European target would be discriminatory for farmers and could have a negative impact on production and/or harvest quality.

Reduction in the use of antimicrobials:

Increasing antimicrobial resistance is one of the most sensitive topics in relation to both human and animal health as well as the environment. It is a serious concern both in Europe and worldwide. Antimicrobial resistance is strongly connected to the amounts of antimicrobials used. A firm commitment to biosecurity and hygiene as tools for disease prevention must be endorsed by all stakeholders. Healthy animals do not need antimicrobials.

Copa and Cogeca consider it necessary to harmonise collection and monitoring systems of antimicrobials in Member States, in order to have reliable and comparable data on where the drugs go, for which animal species and for what purpose. All the different types of livestock sectors and livestock species in Europe should be properly taken into account and assessed. This should be the starting point to allow for analysis and evaluation at EU level. This should be done in a cost-effective manner and without increasing the administrative burden for farmers.
It is clear that a “One Health” approach is important for all health stakeholders in the EU (both for humans and animals) and everyone must play their role in controlling and reducing antimicrobial resistance in Europe.

Based on the principles of “prevention is better than cure” and “as little as possible, as much as necessary”, improving animal health by other means rather than treatment is one of the best ways to reduce the need for antibiotic treatment.
We also want to mention that veterinary supervision of animals and products is an essentially safe tool and significant progress has been made in related

legislative matters at EU level over the past few years.

The development of innovative and/or improved preventive technologies (e.g. vaccination) by the industry has increased and also improved, widening the possibilities to avoid disease outbreaks in the EU territories in the future. Furthermore, epidemiological surveys into animal health ensure that adequate devices are put in place to monitor the risks linked to pathogenic agents which threaten the territory.
Nonetheless, more research to find out new innovations such as improving the gut health of production animals, better feeding strategies and new technologies to breed animals with better immunity and disease resistance, is needed.

Animal Welfare:

The introduction of measures to improve animal welfare in animal husbandry, such as straw bedding, outdoor production systems, group housing, free-farrowing and different systems for egg and rabbit production require considerable investments and long-term commitment from farmers. Furthermore, these costs are often not recovered from market conditions that do not always favour a proper return on investment in due time.

Therefore, a framework of incentives is definitely crucial to ensure better commitment from farmers when it comes to improving animal welfare across all EU Member States. The Common Agricultural Policy plays a relevant role in guaranteeing that our animals are raised in compliance with high traceability, animal health and welfare and environmental standards.
Concerning international trade with third countries, Copa and Cogeca believe that it is important to continue focusing on animal welfare initiatives such as bilateral and multilateral negotiations and cooperation with the WTO, OIE and FAO. There is still a lot of work to be done to ensure that there is a mutual understanding on animal welfare. Furthermore, reciprocity on animal welfare standards should be one of the main requirements when negotiating trade agreements with third countries.
The transportation of live animals within the EU takes place under high animal welfare standard conditions and plays an important role in EU Member State exports.

Human nutrition, consumption and education:

A sedentary lifestyle, poor dietary habits and physical inactivity are only some of the factors influencing how we live our lives and that have an effect on our health. Quite often consumers are probably unaware of the benefits of including agricultural products in a nutritious, balanced diet or they do not have enough time to cook. Agricultural products are an essential source of different nutrients needed for good health and they are much more than just energy, salt, sugar or fat. They include many different vitamins, fibre, essential amino acids, crucial fatty acids, and minerals such as calcium, iron, magnesium, potassium, phosphorus, selenium or zinc, etc. We recommend an increased consumption of agricultural products, as well as high-quality and nutritious value-added products.

Education is of course important and we strongly believe that it has a tremendous impact on food choice and dietary habits. A balanced diet provides an excellent basis for getting into the habit of eating ingredients that are needed to stay healthy. This means eating a wide variety of foods in adequate proportions to achieve and maintain wellbeing, vitality and high living standards.
EU marketing standards play an important role in strengthening the internal market and avoiding the proliferation of national and private standards and, therefore, reducing costs for farmers and cooperatives.

Labelling:

We noticed that the Commission plans to explore new ways to give consumers better information on food in the context of the Green Deal.
Copa and Cogeca would like to underline that consumers show a high interest in information regarding the origin of food. A mandatory “place of farming” (place where the product was harvested or the animal was reared) origin labelling at EU level (“EU”; “non-EU”; or “EU/ non-EU”) should be envisioned for fresh and processed products, as well as for catering services and advertisement materials: consumers shall recognise that European farmers follow some of the best standards in the world. For specific sectors[1], a mandatory origin labelling at Member State level may be considered, whenever economically feasible and advantageous for the primary producers.*

Colour coding labelling systems only focus on certain nutrients, thereby limiting and ignoring the overall nutritional contribution of agricultural products to our diet. The development of a possible EU-wide or other type of systems should

1 i.e. poultry, sheep and goat meat, rice, fresh and processed fruit and vegetables, eggs, rabbits and honey
* Partial reserve from COLDIRETTI

be science-based, meaningful for all consumers and promote a positive approach that does not discriminate between agricultural products and other products that do not even feature as part of dietary recommendations. EU farmers and their cooperatives strongly oppose colour coding systems, as they only focus on certain nutrients, thereby limiting and ignoring the overall nutritional contribution of agricultural products to our diet.

Food fraud along the agri-food chain:

The European Union must enhance its role as a global leader in the fight against food fraud along the entire agri-food chain in order to protect the quality work of EU farmers and food business operators. To do so, it is essential to better define at EU level the concepts of "Agri-food Fraud/ Crime" and "Sounding", in order to avoid quality EU products continuing to be copied, a phenomenon that is causing significant economic damages to EU farmers.
Moreover, within the framework of the Farm to Fork strategy, the European Commission should guarantee a harmonised and well implemented enforcement of the new official controls regulation to ensure the same quality and frequency of controls all over the EU.

Common Agricultural Policy:

The Commission needs to show how the ambition of the Green Deal and Farm to Fork Strategy will be mirrored in the CAP Strategic Plans from the outset. We cannot allow the ongoing co-legislative process on the CAP post 2020 to be hindered, at this stage, with additional requirements. An adequate solution must be found to address the challenges of the European Green Deal in the CAP in a timely manner.
For the eco-schemes that Member States must include in their CAP Strategic Plans, the Commission must also show how farmers can be rewarded for these practices in a context of a smaller CAP budget.

When moving forward to a new and greener policy, a just transition for all is of paramount importance. Farmers and their cooperatives are facing many challenges and they will be the ones to endure the biggest impact on their livelihoods and economic activity. Yet this should not be so. The costs for implementing a new policy must be borne by all, from farmers and processers to retailers and consumers. We need to establish the "leave no man behind" concept and protect the most vulnerable from unintended consequences of the new policy.

Climate change:

European farmers and agri-cooperatives are first in line in terms of climate change impact and must cope with the increased costs of adaptation and mitigation. With the political ambition of Europe to become the world's first climate-neutral continent, a holistic approach must be followed. It is fundamental to design sustainable policies and programmes that accompany our farmers and their cooperative towards this transition and recognise the importance of the existing tools.

Adaptation to climate change involves measures to reduce the impact of excessive rainfall, extreme heat waves, spring frost and droughts on plant growth, carbon sequestration, biomass production and livestock rearing. Preventive measures such as irrigation or drainage, frost and hail control infrastructure, water rights, soil fertility (biological, chemical, physical) management and risk management tools have to be deployed to get more farmers on board.
European farmers and agri-cooperatives need to have access to technological advancements in order to overcome a number of challenges, such as remaining competitive, adapting to and mitigating climate change, and providing an adequate supply of high-quality food.

European agriculture and forestry plays a crucial role in addressing climate change adaptation and mitigation, as it has significant potential to reduce the emissions, to sequester carbon and to boost economies in a sustainable manner. That said, when addressing emissions stemming from agriculture, we must also recognise that these result from natural processes.
Once the inputs in agriculture have been decarbonised, there are still emissions that cannot be avoided and that are part of a natural cycle. As for carbon sequestration, this must be taken into account when implementing the legislative instruments on climate. A carbon market place or crediting schemes should be part of the incentivising toolbox to deliver on climate objectives. More ambition with a diminished CAP budget will not deliver if the private sector is not properly involved.

Research and Innovation:

Research and innovation is crucial to develop and provide innovative tools and solutions for European farmers, their cooperatives and forestry owners to improve their productivity and adapt to climate change while reducing the impact on the environment. In particular, research and innovation will play a central role in ensuring an

effective transition to environmental sustainability, by identifying and optimising solutions that can be rapidly scalable, testing new ones, and improving and optimising existing ones that have already led to tangible results in the efficient management of natural resources.

Innovation uptake can only be secured through their involvement in research and innovation activities alongside adequate investment in technologies, investment in broadband (including reliability), interoperability, digital skills and advisory services, digital innovation hubs, new business and governance models. Access to up-to-date technologies are a key factor in keeping European agriculture competitive on a global market and in maintaining our high standards.

We cannot afford to lose time by refraining from using cutting-edge technologies such as new animal and plant breeding techniques, artificial intelligence and digital technologies. In particular, new breeding techniques (NBTs) could improve the tolerance of plant varieties to water stress and pests, as well as the disease resistance of animals. Each NBT should be analysed and discussed by experts on a case-by-case basis and according to strict scientific criteria.

Biodiversity:

Farmers and forest owners are custodians of the European countryside. Together they have made real progress on the climate and environment front, by reducing emissions and implementing more sustainable practices. In order to continue to do so, they need environmental legislation that recognises their efforts and gives them enough flexibility to use natural resources more efficiently, while ensuring food security.

It is therefore crucial that all targets in the future Biodiversity Strategy 2030, while ambitious, are realistic. Furthermore they must take into consideration these negative consequences of climate change to motivate efforts towards the global 2050 Vision for biodiversity "living in harmony with nature".
Therefore, the EU must ensure that plant, animal genes and genetic natural traits that can be found in nature or obtained through mutagenesis are not patentable. Patents on products, traits or genes derived from genetic engineering breeding techniques should only apply to products that contain DNA that cannot be found in nature or cannot be obtained through conventional breeding methods or mutagenesis techniques.

Circular economy:

In the last decade, the EU has succeeded to support and promote a sustainable circular bioeconomy. This has offered alternatives to fossil-based materials and thus contributed to combat climate change. The updated EU Bioeconomy strategy and the implementation of its action plan must therefore be a key component of the European green deal. Concrete tools included in the EU Invest, CAP and Horizon Europe can contribute to this and deliver on a better use of existing resources whilst creating new business opportunities and jobs for rural areas.

Regarding the fight against food waste, it is essential to make a clear distinction between what is "avoidable" (waste) and what is "non-avoidable" (loss). When defining food losses, several factors affect primary agricultural production that are out of farmers' control, such as adverse weather conditions and climate change, pests and diseases, and market disturbances.
We need a coherent legislative framework, tailored economic support and science-based political will to reposition agriculture at the centre of the circular economy, improving the farmers' toolbox and their access to innovation (biological, technological and societal). Agriculture is the only stage that will be capable of closing the gap in the food chain and making our society truly circular.

Organic farming:

Organic farming strikes a good balance between various aspects of sustainability. This production method puts a high emphasis on the protection of the soil, water and biodiversity and, with regard to animal production, on animal welfare considerations. Despite substantial investments in organic production in recent years, the growth of the European organic food market is now slower than in the past. In some Member States, the share of agricultural land dedicated to organic farming is well above the market share of organic consumption.
Copa and Cogeca strongly support an organic sector development that is driven by consumer demand. This, in order to maintain the economic viability of organic farmers by not reducing farm-gate prices. This is essential to protect existing farming investment in the sector.

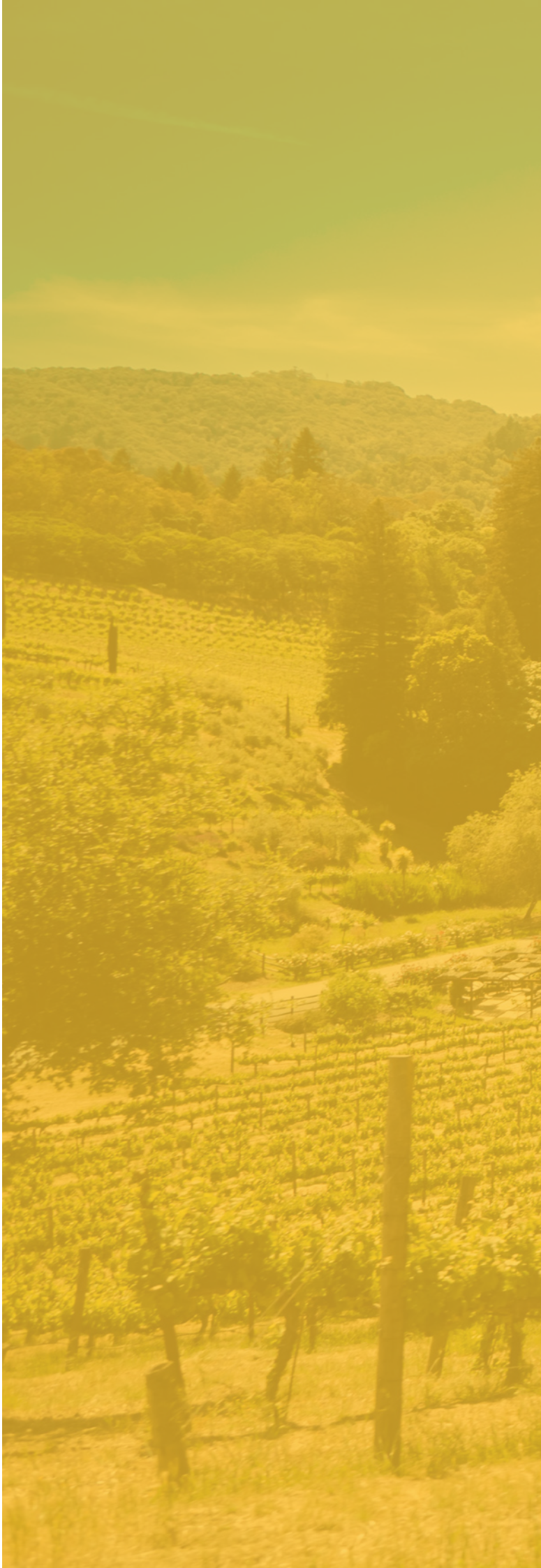
Improving farmers' position in the food supply chain:

In order to deliver on the strategy objectives, responsibilities need to be shared among all actors in the food chain. Additionally, achieving ambitious goals requires synergies between

sectors and players in the value chains. In this context, cooperation among farmers is critical for accomplishing economic, environmental and social goals. Cooperatives as farmer-owned enterprises, by concentrating the food supply and strengthening farmers bargaining power create economy of scales in the market, allow the implementation of innovative, and sustainable actions that create employment in depopulated rural areas, and benefit farmers, consumers and the overall functioning of the value chain2.

Cooperation between farmers needs to be supported by being more efficient and sustainable in many sub-systems (e.g. farming system, waste management system, input supply system, packaging, etc.). This is because it is the tool allowing interactions with other key systems (e.g. energy system, manufacture system, transport systems etc.), and boosts the uptake of digital solutions and novel technologies in the primary production sector. Agri-cooperatives require in this respect a supportive legislative environment to further develop innovative business models that can deliver on the objectives of the Farm to Fork Strategy and contribute to the achievement of the UN Sustainable Development Goals.

In this respect, cooperation among farmers engaged in promoting sustainability and ways to fairly share the added value created by sustainable products and actions with producers, need to be supported, This includes addressing how the competition rules regarding collective initiatives can be clarified.



2 EUROPEAN COMMISSION, Study of the best ways for producer organisations to be formed, carry out their activities, and be supported, May 2019.

copa*cogeca
european farmers european agri-cooperatives

61, Rue de Trèves
B - 1040 Bruxelles

Telephone 00 32 (0) 2 287 27 11
Telefax 00 32 (0) 2 287 27 00

www.copa-cogeca.eu

Copa and Cogeca are the united voice of farmers and agri-cooperatives in the EU. Together, they ensure that EU agriculture is sustainable, innovative and competitive, guaranteeing food security to half a billion people throughout Europe. Copa represents over 23 million farmers and their families whilst Cogeca represents the interests of 22,000 agricultural cooperatives. They have 66 member organisations from the EU member states. Together, they are one of the biggest and most active lobbying organisations in Brussels.

F2F(20)7940