



EUROPEAN COMMISSION  
HEALTH AND FOOD SAFETY DIRECTORATE-GENERAL

**Farm to Fork Strategy**

## **PLENARY MEETING OF THE ADVISORY GROUP ON SUSTAINABILITY OF FOOD SYSTEMS**

8 MAY 2024

### **Summary Record**

#### **1. OPENING REMARKS**

The Director for Food safety, sustainability, and innovation of DG Health and Food Safety opened the meeting and welcomed the participants. He reminded participants that the meeting was recorded for the purpose of drafting the minutes.

The Chair gave an update on the initiatives of the Farm to Fork Strategy, both delivered and ongoing. He noted the ongoing preparatory work in view of the next Commission mandate and stressed the importance of food and the crucial role food production, transformation and distribution play in the economy.

#### Comments and questions raised

FEFANA asked whether the Farm to Fork priorities that were not delivered under the current Commission, would continue to be priorities after the European elections.

The Chair explained that the priorities for the next mandate would be decided by the new Commission.

#### **2. STRATEGIC DIALOGUE – STATE OF PLAY**

COM provided an oral update on the ongoing work supporting the Strategic Dialogue.

On 1 January 2024, the President of the European Commission launched a ‘Strategic Dialogue on the future of the EU farming sector and food systems. A group of 29 stakeholders (farmers’ organisations, food industry, retailers, cooperatives, consumer organisations, environmental and non-governmental organisations and academics), representing the different interests in the food chain, were tasked to work on a shared understanding, vision and approach for EU farming and food systems and would deliver a report, which would feed into the work of the next Commission and of the stakeholders of the food chain. COM stressed that it would not be a Commission report, but a report by the Chair of the group, prepared and agreed on by its members.

The group created 4 working groups around the different key elements for a sustainable agriculture and food systems:

- Economic performance of agriculture
- Environmental performance of agriculture
- Innovation and research

– Bio-chain approach

Alongside the confidential plenary and working group discussions, the Chair launched a targeted consultation to harvest the views of key stakeholders, namely EU-wide organisations who were not directly represented by the 29 members of the group, but whose input would be relevant to the work of the Strategic Dialogue.

COM thanked stakeholders for the contributions, which were being analysed and would feed into the ongoing work of the Strategic Dialogue.

COM added that the Economic and Social Committee (EESC) and the Committee of the Regions (CoR) were also consulted and the Chair of the Group had informed the AGRIFISH Council on the progress of the work. In addition, the Chair had met with COMAGRI and the main groups of the European Parliament.

COM reiterated that it was not a traditional consultation process and emphasised again that it would not be a Commission report, but that the report would be taken into account for the future work of the Commission in the area of the transition of the food system, including the preparation of the next Common Agricultural Policy (CAP).

COM concluded that drafting had started on the key elements of the report, namely the context, vision, guiding principle and actionable recommendations.

#### Comments and questions raised

FEFANA enquired whether the identity of the experts had been made publicly available and commented that the feed industry was not represented amongst the organisations that were consulted.

COM confirmed that the identity of the experts had not been made publicly available on the [dedicated webpage](#), only the names of participating organisations. COM explained that there was representation from the input industry, albeit not FEFANA. Nevertheless, COM invited FEFANA to provide a contribution in the context of the targeted consultation. COM further reassured FEFANA that the challenges linked to the feed industry would be fully considered in the discussion.

EU Specialty Food Ingredients and Starch Europe asked whether COM envisaged further stakeholder consultations and enquired about the timeline. COM replied that no additional stakeholder consultation was foreseen.

AIPCE-CEP expressed concern regarding the lack of references to the fish industry, as opposed to the agricultural sector and requested that a similar Strategic Dialogue should be launched for fisheries. COM confirmed that, while the Strategic Dialogue focused on the future of agriculture and farming, fisheries and fish products had been included in the analysis and the work.

Croplife Europe enquired about the short to medium-term outlook, more specifically with regard to the regulatory checks and balances, including better regulation, in order to create a predictable environment in terms of policy-making and to ensure legal certainty for the industry. COM explained that the Dialogue took a medium-term outlook, i.e. 2040 and beyond. COM noted that predictability and stability of the regulatory environment were part of the conversation in the Strategic Dialogue.

Cellular Agriculture Europe asked to which degree food bio manufacturing was part of the discussion. COM confirmed that it was part of the discussion, in particular in relation to innovation, including new technologies, and that part of the report would be dedicated to this.

UECBV asked whether the Strategic Dialogue was about the joint societal aim and goal envisioned for agri-food production in the EU and would provide a vision for the future. UECBV added that this was not reflected in the four questions that were shared with the stakeholders. COM replied that it could not speak on behalf of the Chair and members of the Strategic Dialogue group, but that – in its opinion - one of the objectives would be to have a shared understanding and vision of what the EU farming and food systems should look like in 2040.

UNESDA asked how the issue of fairness would be addressed in the Strategic Dialogue and whether there would be concrete recommendations on this topic in terms of distribution of margins and profits. COM recognised the importance of having a fair distribution of value across the food chain and assured that it would be covered in the Strategic Dialogue.

ECVC questioned in which forum the debate should be held to ensure the democratic functioning of the EU. ECVC further proposed to enlarge the debate with more in-depth political discussions. COM recalled that the Strategic Dialogue group was not the only forum where there would be a debate on the future of agriculture and food systems. In the aftermath of the publication of the report, there would be further exchanges of views and discussions in existing forums, including the established dialogues with civil society groups. COM stressed that the democratic process would be fully respected for the future work.

### **3. SUSTAINABLE PUBLIC PROCUREMENT – STATE OF PLAY**

COM gave a presentation on [Sustainable Public Procurement](#), highlighting in particular:

- the importance of public procurement as an enabler for the transition towards sustainable food systems
- the main issues with sustainable procurement of food for schools and public institutes
- possible actions to facilitate or support sustainable procurement of food and catering services

#### Comments and questions raised

SAFE commented that buying the cheapest food offer would not necessarily be the healthiest option and further suggested to take food waste management into account in sustainable public procurement. COM explained that the aim of the criteria would be to enable procurers to buy food that is more sustainable, which might indeed not be the cheapest. COM stressed the importance of a balanced approach.

BEUC enquired about the format of the procurement criteria and asked whether the current Commission would propose to the next Commission that the legislative framework for sustainable food systems (FSFS) would remain a priority. COM replied that the work it is currently doing was envisaged in the context of the FSFS. The objective is to carry out preparatory work on sustainable public procurement criteria, starting with an analysis of what has already been done. COM added that it would continue the work to be ready once a decision will be taken on the status of these potential criteria.

EUFRAS asked about the difference between the green public procurement criteria and the sustainable public procurement criteria. COM replied that the green public procurement guidance, which already existed and covered environmental criteria, would be the basis, but would be updated if needed and extended with criteria related to the other dimensions of sustainability, i.e. nutritional, social, health and economic aspects.

EUFRAS further enquired whether it was correct that 14 percent of the GDP was dedicated to public procurement. COM confirmed this figure and added that the public food sector, which is the one liable to be influenced by Sustainable Public Procurement criteria, is estimated to be worth around 55 billion EUR.

FEBA welcomed that the criteria would also focus on food waste prevention. FEBA further stressed that it was crucial to support the organisations that deal with the recovery and redistribution of surplus food and to facilitate food donation. COM confirmed that this was already included in the green public procurement criteria.

PAN Europe welcomed the inclusion of climate change mitigation and adaptation, promotion of sustainable practices and protection of biodiversity, but highlighted the contradiction with the recent removal of a number of such important conditions related to good farming practices from the Common Agricultural Policy (CAP). COM replied that - in its opinion - there was no contradiction. Sustainable public procurement criteria would stimulate farmers to use more environmentally friendly practices over and beyond regulatory requirements.

Independent Retail Europe commented that the application of sustainable public procurement criteria would raise challenges for retailers and consumers, such as less convenient packaging. COM acknowledged the importance of taking the challenges and the impact on the consumers into account.

IFOAM Organics Europe asked whether SANTE planned to work together with AGRI on market engagement and include farmers in the work related to sustainable public procurement. COM confirmed that it was working with AGRI and other DGs to ensure a common approach.

EUREAU commented that the difference between the green public procurement criteria and the sustainable public procurement criteria should be clarified to avoid confusion. EUREAU further commented that water consumption as an indicator was too simplistic and stressed the importance of quantifying the impact on water resilience at regional level. COM explained that water consumption criteria were already included in the green public procurement criteria and that the Joint Research Centre (JRC) would assess the further development and impact of the criteria.

EUREAU asked to elaborate on the uptake of green public procurement criteria. COM explained that it did not have a good view on the uptake of green public procurement criteria.

EFFAT expresses concern regarding the lack of mention of the social labour dimension, i.e. wages, working conditions and respect of collective bargaining through public procurement. COM confirmed that the social / labour dimension is considered in the context of the development of the criteria.

EFFAT asked whether sustainable public procurement now fell onto the authorities, since the FSFS is on hold. COM replied that the sustainability criteria that are being drawn up would not only support the authorities, but also the procurers.

#### **4. PLANTS OBTAINED BY CERTAIN NEW GENOMIC TECHNIQUES – STATE OF PLAY**

COM provided a short oral update on the Commission's [proposal](#) for a Regulation on plants obtained by certain new genomic techniques (NGT) and their food and feed, which had been adopted on 5 July 2023. COM provided an overview of the advancement of the proposal in the Council and Parliament.

##### *European Council*

- In the 2<sup>nd</sup> half of 2023, the Spanish Presidency discussed the proposal at technical level in several Council Working Party meetings and AGRIFISH Council exchanges.

- In December 2023, under the Spanish Presidency, the AGRIFISH Council did not manage to reach an agreement on the Commission’s proposal.
- Since January 2024, the Belgian Presidency has taken up the work in the Council and presented a revised text in COREPER on 7 February 2024. However, a general approach was again not reached.
- In the AGRIFISH Council of 26 March 2024, NGTs were discussed under any other business, and a number of Ministers stressed the importance of providing the agrifood sector with new plant breeding strategies to strengthen its sustainability, resilience, and profitability.

#### European Parliament

- The European Parliament adopted its position for negotiation with Member States on 7 February 2024. The position has been reconfirmed by the EP Plenary on 24 April 2024.

#### Comments and questions raised

SAFE referred to the amendment passed in the Parliament requiring mandatory labelling for products from NGT Plants, Category 1 and NGT Plants Category 2 and asked how this discussion was going in the Council and whether there was mention of it in the text proposed by the Belgian Presidency. COM replied that discussions on the text were still ongoing in the Council. COM explained that the Council, during the Working Party meetings, maintained the general structure of the Commission’s proposal, but that it would be decided in the next weeks how and if the text would be amended.

FoEE enquired about the announced Commission study on patenting of plants and asked COM to clarify whether work had started, what the criteria/guidelines were and who was leading this study. COM confirmed that work had started to prepare the study under the leadership of DG GROW. COM acknowledged the importance of the study on the impacts of patents and emphasised its commitment to deliver.

### **5. EVALUATION OF EFSA’S PERFORMANCE 2017-2024 – NEXT STEPS**

COM presented the next steps regarding the [Commission’s evaluation of EFSA’s performance 2017-2024](#).

COM addressed the background of the evaluation, the purpose and scope, the data collection and methodology, the study to be carried out by an external contractor and the consultation strategy.

COM concluded with an indication of the detailed timeline for the evaluation.

#### Comments and questions raised

FoodDrinkEurope enquired whether the study by the external contractor would foresee individual interviews with applicants. COM confirmed that applicants’ views would be considered. It was part of the terms of reference and this would be followed up on with the external contractor.

FEFANA, EU Specialty food Ingredients and Croplife Europe echoed FoodDrinkEurope and called for targeted stakeholder consultations and interviews. FEFANA expressed concerns if COM were to launch public consultations in July 2024. COM assured stakeholders that any consultation would be launched in September 2024 at the earliest and

would take twelve weeks to three months. COM underlined its commitment to ensure engagement with the business community, civil society and academia so as to ensure a global comprehensive consultation strategy.

EU Specialty Food Ingredients enquired about the timeline for possible targeted consultations. COM explained that it was expecting to sign the contract for the external study in July 2024 for a duration of twelve months. Based on this, COM estimated that the targeted consultations and interviews would still be held in 2024 (2<sup>nd</sup> half), in order to leave six months for the analysis and processing of the evidence.

FVE highlighted practical challenges to participate in the EFSA feedback mechanisms and recommended to streamline these mechanisms. COM suggested to bring up all relevant points in the forthcoming consultation.

PAN Europe highlighted its support for the Transparency Regulation and welcomed its implementation, while underlining the need for EFSA's independence.

Croplife Europe stressed that the performance review was also necessary in light of the challenges related to the Strategic Dialogue in order to provide the agri-food chain with all the tools and innovation necessary to face these challenges.

FoEE asked to clarify EFSA's authority in assessments related to sustainability, which would go beyond food safety, and whether it would also assess social, economic and environmental impacts. COM replied that EFSA's mission is outlined in the [General Food Law](#) (GFL) and is complemented by sectoral legislation. In that context, EFSA is required to perform assessments of impacts on health and the environment in the context of sectoral legislation, thus touching upon certain aspects of sustainability. However, EFSA has currently no mandate for the assessment of economic impacts.

Cellular Agriculture Europe asked to clarify whether there was a difference between the case studies mentioned in the presentation and the targeted consultations planned for the second half of 2024. COM confirmed that there would be a difference between the case studies and the targeted consultations of applicants. COM was planning a number of case studies, covering the delivery of output in reaction to mandates received by COM, the European Parliament or Member States, and self-mandates.

Cellular Agriculture further enquired whether there would a link between the planned [EU Biotech Hub](#) and the evaluation of EFSA and the learnings of its process. COM replied that the report on the evaluation of EFSA's performance would be adopted in March 2026 and that therefore it would depend on the timing. However, COM stressed that there was no direct link between the EU Biotech Hub and the evaluation of EFSA and that the hub's objective was to serve as a mechanism to make information available for potential applicants to facilitate the preparation of their applications.

## **6. IMPLEMENTATION OF REGULATION (EU) 1107/2009– STATE OF PLAY**

COM presented an [update and the ongoing developments on Plant Protection Products \(PPP\)](#).

COM elaborated in particular on:

- (a) Actions to facilitate marked access for biologicals used as active substances in PPPs
- (b) Chemical active substances, safeners and synergists data requirements and uniform principles
- (c) Labelling of PPP, and assessment of authorisation applications, including in particular for co-formulants
- (d) Update on guidance documents and mandates to EFSA
- (e) Delays



### Comments and questions raised

EUREAU welcomed the endorsement of the guidance document (GD) on the impact of water treatment processes on residues of active substances or their metabolites in water abstracted for the production of drinking water, and asked to clarify which active substances are concerned by this new GD. COM explained that all substances on the market would have to submit relevant data at some point in the future, in line with the guidance document.

PAN Europe welcomed the regulation on safeners and synergists and asked whether applicants would already have to carry out the studies at present, or only when the regulation would enter into force, considering that such a requirement has been pending since 2014. COM replied that applicants would have to provide a dossier, containing the data in line with the data requirements. Therefore, applicants would be allowed time to prepare the dossiers and to generate the data. For products already on the market, there would be a transitional period.

PAN Europe asked whether there was an updated version of the 2015 guidance document on negligible exposure. COM replied that a revised draft is in preparation and that stakeholders would be consulted once a more mature draft would be available.

PAN asked for an update on PFAS. COM replied that it had initiated discussions with Member States at the Standing Committee on Plants, Animals, Food and Feed – for the time being no concrete outcome could be reported.

PAN Europe enquired about EFSA's opinion on biotechnology applied to micro-organisms. COM replied that the request to EFSA was done as a follow-up to the request for EFSA's opinion on particular risks of new genomic techniques for plant breeding, at the request of stakeholders and Member States.

Croplife Europe expressed its commitment to contribute to consultations and guidance and underlined its appreciation of the strong focus on low-risk biological products. Croplife further supported the work related to guidance on negligible exposure, emergency authorisation and zonal authorisation.

## **7. PLANT HEALTH AND REPRODUCTIVE MATERIAL – STATE OF PLAY**

COM gave a presentation on the [Legal Implementation of the EU Plant Health Regime and Plant and Forest Reproductive Material \(PRM/FRM\)](#).

### *Legal Implementation of the EU Plant Health Regime*

COM elaborated on the measures taken or to be taken on high-risk plant pests, on the revisions of the annexes of Implementing Regulation (EU) 2019/2072, on the list of measures adopted since the last meeting, on the latest modification of the reduced frequency of import checks of some commodities.

COM also informed on the status of the negotiations in the Parliament and the Council on the Commission proposal for amendment of Regulation (EU)2016/2031. Formal adoption is foreseen for the third quarter of 2024.

### *Plant and Forest Reproductive Material (PRM/FRM)*

COM informed on the status of the negotiations in the Parliament and the Council on the revision of the plant and forest reproductive material legislation presented by the Commission in July 2023. Both proposals have been discussed in the relevant Council Working Party and the examination of proposals is ongoing. A certain number of key

policy issues remain to be addressed before the Council will be ready to reach a position on which they will be able to start discussing with the EP in the trilogues. The Parliament adopted its opinion including amendments on both proposals on 24 April 2024.

#### Comments and questions raised

ENA asked to clarify how the movement of plants without plant passports would work in practice or whether it was necessary to wait for the implementing acts. COM acknowledged the importance of this issue for the sector. COM explained it would work on two implementing acts as regards plant passports very soon and welcomed stakeholder input.

### **8. OFFICIAL CONTROLS REGULATION GUIDANCE (OCR) – STATE OF PLAY**

COM presented a comprehensive update on the [Commission Notice on the implementation of Regulation \(EU\) 2017/625 – Officials Controls Regulation](#).

COM reminded stakeholders of the content of the Guidance for the Official Controls Regulation (OCR) and further elaborated on operators' rights and obligations.

COM concluded with the timeline for the adoption and publication of version 2.0 of the OCR Guidance, which was currently at the stage of internal Commission consultation and is foreseen to be adopted in the coming months.

#### Comments and questions raised

FEFAC suggested that COM could draft guidance regarding Article 9, related to the obligation of Member States to perform controls of monitoring plans, since not all Member States were taking this issue into account in the drafting of their monitoring plans. COM said it was aware and took note of the request. COM explained that it envisaged a third version of the guidance, in which this issue could potentially be addressed.

### **9. AOB**

*European Court of Justice (ECJ) Ruling in relation to the assessment of pesticide products (requested by PAN Europe)*

COM replied that it had not yet completed its analysis of the ruling. The Dutch court having submitted the request for a preliminary ruling would have to decide on the specific case, after having received the ECJ preliminary ruling. COM will discuss with the Member States the consequences of the ruling for product authorisations, once it will have completed its analysis.

#### Closing remarks

The Chair informed participants of the upcoming Animal Health Advisory Group meeting, which was planned to be held physically on 11 June 2024.

The Chair added that the date of the second plenary meeting for 2024 had not yet been decided but would be communicated in due course.

The Chair thanked all speakers and participants for their constructive contributions and closed the meeting.