



EUROPEAN COMMISSION  
HEALTH AND FOOD SAFETY DIRECTORATE-GENERAL

**Farm to Fork Strategy**

**AD HOC MEETING OF THE ADVISORY GROUP ON SUSTAINABILITY OF FOOD SYSTEMS ON A  
LEGISLATIVE FRAMEWORK FOR A UNION SUSTAINABLE FOOD SYSTEM (FSFS)**

12 JULY 2023

**Summary Record**

**1. INTRODUCTION BY THE CHAIR**

The Chair welcomed the participants and briefly explained the context and purpose of the meeting, underlining that the initiative, a framework law, would aim to introduce new concepts, principles and definitions regarding the sustainability of food systems. She underlined that the purpose of the meeting was not to discuss all the building blocks of the future legislative proposal, but to have a discussion on the enabling part of the Framework Law.

The Chair asked whether participants had questions on the scope or the agenda.

Comments and questions raised

EDA commented that – in view of the positive opinion received by the Regulatory Scrutiny Board (RSB) – it expected a more fleshed out presentation.

COM replied that the reflections were still ongoing on the legal proposal and that although at this stage of the process it is not common practice to carry out consultations with the MS and stakeholders, it was considered important to have an exchange of views on the fundamental concepts of the future framework law.

**2. LEGISLATIVE FRAMEWORK FOR A UNION SUSTAINABLE FOOD SYSTEM (FSFS):  
OBJECTIVES, PRINCIPLES, DEFINITIONS, AND GOVERNANCE - EXCHANGE OF VIEW**

COM gave a presentation on the [Legislative Framework for a Union Sustainable Food System](#), consisting of four parts, namely the definitions, the objectives, the principles and governance.

The Chair stressed the importance of the definition of ‘Food System Law’ and of the mechanism of alignment to be introduced in the future proposal that would push COM to evaluate existing law and assess whether they would need to be aligned to the FSFS principles and objectives.

**a) General exchange of views**

AIPCE-CEP asked to elaborate on the economic pillar. It raised concerns with regard to the dependency on imports and asked whether COM was taking into account the economics of sustainability.

FEFAC asked to clarify the lack of reflection in the objectives of lessons learned from the Covid-19 epidemic and the Russian invasion. FEFAC further asked how COM envisaged the FSFS to contribute to the overall EU policy goals in the area of strengthening the food autonomy in the EU.

Starch Europe commented that bio-economy was missing. EFPPRA and CEFIC supported this comment.

FoodDrinkEurope informed COM that it could provide preliminary comments, but that it would need time to consult its members and get back with written comments. Copa-Cogeca, CLITRAVI, EBIC, EFFAB and UNESDA supported this comment.

Copa-Cogeca raised the necessity for a dedicated budget for a sustainable food system in the EU, other than the Common Agricultural Policy. Copa-Cogeca raised the necessity for a dedicated budget for a sustainable food system in the EU, other than the Common Agricultural Policy. CLITRAVI supported this comment.

Eurogroup for Animals commented that a plant based approach would be required to increase the resilience of the food system.

EDA remarked on the lack of competitiveness, trade and single market. EDA enquired about the reason why the plural “s” in food systems was abandoned.

EHN commented that the general objective should not be the internal market, but the promotion of health.

CLITRAVI enquired about the timeline for the legislation. CLITRAVI expected more ambition with regard to the enablers. CLITRAVI supported the reference to the preservation of the cultural and food heritage. Finally, CLITRAVI suggested that the final legislation should be in line with international standards and WTO MC12 declaration, as in the case of the definition of sustainability, in line with the FAO definition to align with international standards. With regard to general architecture and policy coherence, EBIC asked how the alignment mechanism with other EU legislations would work in practice.

EFFAB stated that it would like to see more emphasis on plant and animal breeding. EFFAB enquired how dynamic the framework law would be and whether COM planned evaluations of the different systems.

ECVC commented that it was missing four points in the presentation, namely the lack of human needs and rights, healthy diets, self-sufficiency and the farming sector.

FEDIOL asked for clarification on the alignment mechanism. With regard to governance, FEDIOL called for a harmonised approach at EU level. FEDIOL further asked to clarify the difference between principles and objectives.

Eurocities welcomed the broader use of the word “citizens” instead of “consumers”. Eurocities suggested adding additional definitions, for example related to innovation, to guide the work of policymakers at national and subnational level. Eurocities further welcomed the governance provision. Finally, Eurocities underlined the importance of targets to go together with the definitions.

BEUC stated that the objectives were not ambitious enough and that the single market should not be the main ambition. Regarding the general architecture, BEUC remarked that one of the building blocks on minimum sustainability requirements seemed to have disappeared and asked whether it would be covered by the alignment exercise.

PROFEL expressed concern that the framework measures appear to focus on mitigating further climate change, whilst doing little to build resilience into food production systems that are already challenged by climate change.

## Answers by COM

COM provided the following answers:

### Process:

COM recognised the need for participants to consult with their members and welcomed written contributions. COM explained that it would be difficult to give a deadline, since it would depend on the timing of the adoption, for which the date had not yet been set.

### Level of ambition/aims/internal market vs. enabling systemic transition:

The internal market would be central to the initiative and goes together with sustainability of food systems. The objectives and principles should reflect the need for a systemic transition to sustainable food systems.

### Governance:

COM clarified that the purpose of governance provisions would be to encourage Member States to use their own competencies in areas where there is no EU competency to support further the transition to sustainable food systems, and not to require the adopting national rules that would hinder the smooth functioning of the internal market.

### Competitiveness/economic dimension/trade:

COM would look into the international dimension. It might not be part of the principles, but it would be part of other provisions.

With regard to alignment with international standards, stakeholders and the European Parliament (EP) requested the inclusion of provisions on the applicability of sustainability standards in imported food. COM will look at the possibilities, but it would be in line with the report that was adopted by COM and that required compliance with WTO rules.

### Plant-based diets:

COM would not expect to be that specific in the FSFS, but would ensure that diversity would be taken into account in the structures of food systems. Details of sustainable public procurement and sustainable labelling would be part of the subsequent acts that would specify the mandatory sustainability criteria.

### Public Health:

COM ensured that healthy diets would be central in the FSFS.

### Food Security:

COM explained that food security would be reflected in the principles and definitions with regards to resilience of food systems. COM added that it could be both a principle and an objective.

### Budget:

COM took good note, but added that this would require difficult political decisions under the current geopolitical circumstances. COM acknowledged the need to accompany and facilitate the long-term transition.

### Targets:

COM confirmed that it had no intention to introduce quantitative targets.

### Bio-economy:

With regard to inputs and other areas, which are not directly part of the food system, but which have an influence on the food system, COM said it took good note and would look into how to include these.

Alignment mechanism:

COM would need to look at which modalities to follow. There are different methods that could be used as an example, but further internal discussion would be necessary.

Objectives and principles:

COM explained that principles are not the same as objectives, but that they would need to be taken into account to pursue the objectives. COM recognised that sometimes it is borderline and that some could fit both categories.

Food system vs. food systems

COM explained that the use of singular aimed to clarify that the framework would apply mainly to the EU food system and would not be applicable outside the EU. However, it acknowledged that there may be different types of food systems in the EU and took note of the comment.

FSFS vs. sectoral legislation

COM explained it would be similar to the introduction of the General Food Law (GFL): the FSFS will form a common base upon which sectoral initiatives should build.

Minimum requirements building block

COM explained that minimum requirements were still there, but that it would use the alignment mechanism, principles and requirements, which were outlined in the FSFS, to introduce minimum requirements in sectoral legislation. The do no significant harm (DNSH) would be there as a principle.

**b) Exchange of views on the definitions**

FoodDrinkEurope suggested to align the definition of ‘food system’ to the FAO definition of “sustainable food systems”, which includes the economic dimension in order to ensure that the concept of “profitability throughout the food supply chain” is included in the definition. FoodDrinkEurope suggested that all the definitions are aligned with FAO definitions. COM explained there was a difference between the definitions of ‘food system’ and ‘sustainability’.

FoodDrinkEurope added that a split definition could make its legal interpretation more difficult. Complicate the issue and would incur the risk that afterwards it would be hard to interpret as unified and common.

COM replied that it was necessary for legal drafting considerations. There was a need to define ‘food system’, because it is a framework for a food system. COM ensured that the economic dimension will be reflected.

FoodDrinkEurope asked to take into account the concept of ‘profitability throughout the food chain’. UNESDA supported the comment.

COM said it took note.

EUFRAS commented that the dimensions should be represented equally and in a balanced manner. EUFRAS further emphasised the importance of bio-economy, which links to both the environmental and social dimension. With regard to the economic dimension, EUFRAS highlighted the role of the local economy, the potential of short supply chains, competitiveness and a fair trade policy.

EBIC suggested to include air and soil, as well as resource efficiency in the environmental dimension.

UNESDA commented that profitability throughout the chain was missing from the definition of economic sustainability and asked COM whether there was a legal base.

On the environmental dimension, Eurogroup for Animals commented that planetary boundaries should be included. With regard to the social dimension, Eurogroup for Animals suggested to change the wording from “animal health, welfare” to “animal health and welfare”.

On the social dimension, FEFAC asked whether there would more precise references to OECD guidance and international conventions. On the environmental dimension, FEFAC asked how COM would ensure the alignment mechanism to avoid different sets of sustainability criteria for the same product.

EPHA enquired whether all definitions were FAO inspired or whether COM used other sources. EPHA further asked how COM envisaged to align all three dimensions and raised concerns about the absence of targets, deadlines and accountability.

Copa-Cogeca expressed surprise that everything in the social dimension was linked to healthy diets and commented that it was missing a reference to food affordability. On the economic aspect, Copa-Cogeca suggested to add a reference on economic viability and on competitiveness with regards to third countries.

CEFIC commented that the food chain is interconnected with other sectors and urged COM to take into consideration the by-products. EFRA supported this comment.

EuroCommerce flagged that waste prevention should be included in the environmental sustainability definition and asked COM to consider the environmental, economic and social contribution of SMEs.

Slow Food echoed Eurogroup for Animals with regard to planetary boundaries and would also like to add resilience. The social dimension should address inequalities and should ensure sustainable diets as well as healthy diets. In addition to fair employment, it should also include safe employment. Slow Food supported EFRAS on local economies and short supply chains.

BEUC echoed Copa-Cogeca’s comment on healthy diets. BEUC suggested to refer to health impacts of food systems, e.g. AMR, pollution, and would like to see a mention of affordability. On the economic dimension, BEUC suggested that transparency could be linked to encourage MS to set up observatories on price.

EHN supported Slow Food’s comment on inequalities and added that promoting and protecting health, as well as well-being, should be included.

ENA enquired why plant health was included in the social dimension and not in the economic or the environmental dimension. ENA further asked clarification on what plant productions and agricultural productions would be included in the FSFS.

EuroCommerce commented that consumer awareness, education and partnerships along the chain, are missing from the social dimension.

PROFEL underlined the need to include plant health in all aspects of sustainability (not only in the social dimension proposed by the EC), when developing the future sustainable food system. PROFEL further commented that soil health should be included in the environmental dimension of sustainability.

#### Answers by COM

COM provided the following answers:

##### Definitions:

- COM confirmed it took good note of the suggestions and assured participants that the definitions were a work in progress and have not been finalised yet.
- COM informed participants that it intended to provide a definition for ‘resilience’.
- COM confirmed that some of the definitions were FAO-inspired, but that it had applied different approaches and looked at what already existed internationally.

- COM confirmed that the definition for ‘food system inputs’ would also cover by-products resulting from the food chain. For products not resulting from the food chain, there would be the alignment mechanism.

#### Balance of the three dimensions

COM replied that the three dimensions were equally important and that it was a priority to find a balance. It would be possible to privilege one of the dimensions in a certain piece of legislation, but this would require finding solutions for the other two dimensions, e.g. in the form of mitigating measures or financial support. COM added that this issue could not be resolved in the context of the FSFS.

#### Market imbalances

With regard to questions pertaining to market imbalances, COM replied that it had been identified as one of the problems in the Impact Assessment and that it would tackle this issue. COM invited participants to share any concrete suggestions they might have to resolve the issue.

#### Social dimension

COM explained that suggestions would be considered to the extent possible, but that it was faced with limitations regarding the social dimension.

#### Publication of the Impact Assessment

COM confirmed that the Impact Assessment would be published at the same time as the proposal.

#### Sectoral legislation

COM explained that sectoral legislation would operationalise the principles.

### **c) Exchange of views on the objectives**

FEFAC suggested to include a more explicit reference to continuous improvement. It further asked to clarify the reference to science-based decision-making. This comment was supported by FoodDrinkEurope, FEDIOL and Copa-Cogeca.

SAFE suggested a more precise reference to food inequalities and fair prices for consumers. SAFE further emphasised the importance of a strong governance and accountability of the food chain actors. SAFE called to include strong enforcement mechanisms as overarching objective.

FoodDrinkEurope suggested to include ‘incentivising food operations to become more sustainable over time’ as an objective. It also suggested to add that the general aim of the FSFS should be to avoid fragmentation of the Single Market.

ECVC commented that the first social objective should be to provide decent food to everyone and underlined the importance of social economic innovation.

FEDIOL supported FEFAC and added that risk-based approach and affordability should be included. Copa-Cogeca endorsed the comment on food affordability.

Copa-Cogeca would like to see food security included in the objectives.

PROFEL endorsed ECVC’s comment on food security.

Under the environmental dimension, EUFRAS suggested to add a reference to a “sustainable bio-economy solution”. EUFRAS further commented that investment in education and advisory services were needed.

Animalhealthurope commented that the biggest challenge was not food security, but food safety. Animalhealthurope asked to what extent the SAM report and stakeholder comments would be taken into account.

Clientearth said that access to sustainable food for all, should be one of the core objectives of the FSFS. It further added that time-bound targets against which progress could be monitored would be necessary.

#### Answers by COM

COM provided the following answers:

COM confirmed that science-based driven decisions would be reflected in the FSFS.

COM acknowledged the comment with regard to the progressive increasing of sustainability and took good note.

COM confirmed that SMEs, small farmers and small businesses would be part of the FSFS proposal in terms of principles.

COM recognised the remarks made on the order of the objectives and stated that it would look into the order to ensure that the objectives come out more prominently. COM acknowledged that pertinent remarks were raised regarding the social dimension.

With regard to the SAM opinion, COM informed participants that the Scientific Advisory Committee (SAM) was an independent body and that DG RTD was responsible for the procedural aspects and the process for the finalisation of the SAM opinion.

#### **d) Exchange of views on the principles**

With regard to inclusiveness, Copia-Cogeca commented that different sectors could all contribute to sustainability, but not in the same way. Copia-Cogeca further expressed reluctance as regards the ‘do no significant harm (DNSH)’ principle.

FESASS requested clarification on DNSH, more specifically on the meaning of ‘significant’, and suggested to add food safety to the list of principles. FESASS commented on the absence of TRACES management and asked whether it was included behind one health.

FoodDrinkEurope expressed concerns about the inclusion of the DNSH principle and noted that a clear definition and guidance would be needed should the DNSH principle be included in the FSFS. It suggested to include free movement of goods and the proportionality principle among the principles. suggested a guideline on the DNSH principle and its applicability on food. FoodDrinkEurope commented that the internal market and proportionality should be included.

BEUC commented that food security should not be limited to supply, but should include all dimensions. In addition, BEUC would include ‘polluter pays’ and ‘provider gets’ principles. BEUC considered innovation to be a means rather than a principle. Finally, BEUC asked to clarify collaboration and public engagement.

EPHA requested a specific reference to promotional health and equity. EPHA warned about the supremacy of the food safety and innovation principles over public health ones..

Eurogroup for animals echoed BEUC on the polluter pays principle. It suggested to include the precautionary principle.

EBIC questioned the principle of innovation and asked whether it was meant in the context of the decarbonisation of the single market. On the DNSH, EBIC believed there was a lack of consistency.

Clientearth did not support the food security principle, because it would water down the objectives of the FSFS. On DNSH, Clientearth supported FESASS’s comment.

FEFAC suggested to extend the one health principle to one nutrition. EFFAB supported this comment.

Croplife Europe supported Copa-Cogeca and added that the FSFS should be inclusive and non-discriminatory. Croplife Europe further supported the innovation principle.

IFOAM Europe echoed concerns about food security and supported the inclusion of a 'polluter pays' principle.

EFFAB suggested to include the social innovation dimension.

UECBV emphasised the need for science based approach and importance and suggested to add malnutrition to the list of principles.

UNESDA expressed concerns with regard to DNSH principle and how it would relate to food. Free movement of goods and the proportionality principle could be added. UNESDA and FoodDrinkEurope supported the inclusion of the innovation principle. FoodDrinkEurope highlighted that the European Commission itself considers the innovation principle an essential principle for policy-making and that it will be an essential enabler of the FSFS.

EuroCommerce supported comments on food safety. In addition, EuroCommerce suggested to add coherence to the list of principles. Finally, EuroCommerce stressed the importance of incentives.

#### Answers by COM

COM provided the following answers:

On the DNSH principle, COM clarified that it concerned a principle that would underpin food system law and would aim at ensuring that food system activities would not significantly harm the environmental dimension of sustainability, while safeguarding the social and economic well-being of food system actors. Sectoral legislation, in turn, would operationalise the principle and would make the meaning of DNSH concrete. COM stressed that sectoral specificities should be taken into account.

In relation to crisis management and food safety, COM explained that the link with the GFL would be explained in the recitals. The FSFS would be complementary to the GFL and would not replace it.

COM further underlined that it would focus on the core principles related to the food system.

COM reiterated the limitations with regard to quantitative targets.

### **3. CONCLUSIONS AND WRAP-UP**

The Chair invited stakeholders to send written feedback as soon as possible.

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