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## Freshfel Europe response to European Commission Farm to Fork Strategy

### Introduction

Freshfel Europe, the European Fresh Produce Association, welcomes the European Commission's recently released Farm to Fork Strategy as part of the European Green Deal to facilitate the provision of nutritious affordable and safe food to European citizens. The Strategy's ambitions to improve lifestyles, health and the environment aligns with Freshfel Europe's mission to ensure that the European fresh fruit and vegetable sector is dynamic and supplies healthy products using the highest quality, safety and environmental and social standards to meet consumers' changing needs.

Freshfel Europe supports the scope of the Farm to Fork Strategy, which covers every step in the food supply chain from production to consumption. Representing the entire European fresh fruit and vegetable supply chain, Freshfel Europe actively promotes action at each stage of the chain and cooperation between actors in the chain for effective collective action. Widespread action and change in this manner and as promoted in the Strategy is essential for systemic long-term change in the agri-food sector.

The Farm to Fork Strategy will reshape policies for the fresh fruit and vegetable sector towards 2030 and beyond. In this process Freshfel Europe would like to highlight that policy coherence, meaning consistency between different policies (often with diverging objectives), is prioritized so that efforts in one area are not hampered by those in another. The fresh fruit and vegetable sector's competitiveness must be maintained in both the short and long-term.

### The Farm to Fork Strategy must support the fresh fruit and vegetable sector with concrete initiatives

The EU fresh fruit and vegetable sector has one of the highest consumption recommendations of a minimum of 400g per day per capita<sup>1</sup>. The Farm to Fork Strategy acknowledges however that fruit and vegetable consumption is "insufficient" with an EU average daily per capita consumption of only 348g<sup>2</sup> and that moving towards a plant-based diet "with more fruits and vegetables will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system". This objective however, is not supported by regulatory and non-regulatory initiatives in the Strategy. Freshfel Europe laments this omission of concrete initiatives to support increased consumption to boost the health of Europe's citizens.

### All sustainable practices in the fresh fruit and vegetable sector should be supported

Fruit and vegetable production has one of the lowest environmental impacts compared to other agri-food sectors. Despite this, the sector continues to seek and achieve further long-term sustainability through circular practices and business operations; environmental, social and economic sustainability is at the core of the fruit and vegetable sector's business. Ensuring circularity along the supply chain, beginning with primary production stage, is key to achieving a greener and more sustainable Europe. Actors in the fresh fruit and vegetable supply chain have been pioneers in developing sustainable business models based on European food and plant safety

<sup>1</sup> World Health Organisation, 2018, Healthy Diet – Key Facts, available at <https://www.who.int/news-room/fact-sheets/detail/healthy-diet>

<sup>2</sup> Freshfel Europe, 2019, Freshfel Europe 2019 Consumption Monitor, available at <https://freshfel.org/what-we-do/consumption-monitor/>

regulations as well as private standards and consumer expectations. But while the sector is continually investing in solutions to cope with emerging challenges linked to sustainability concerns, these efforts are often hampered by regulatory demands. Freshfel Europe would like to underline that the Farm to Fork Strategy's initiatives should not impede efforts by the sector to advance sustainability through different business models. In upcoming debates on the Strategy's proposed initiatives it should be recognized that a large variety of existing practices in the sector, such as Integrated Pest Management (IPM) and the reduction of use of plant protection products, are already being successfully implemented to reach many of the Farm to Fork Strategy's objectives.

### **Overall production environmental performance should not be disregarded in preference for organic**

While increasing organic production in the agriculture sector to 25% of total agricultural land is a key priority of the Farm to Fork Strategy, the overall environmental performance of production methods should not be disregarded in preference for organic. In the fresh fruit and vegetable sector the development of organic production should be approached with a holistic perspective. In doing so all aspects relating to environmental footprint of production methods should be taken into account, such as energy, CO<sub>2</sub> emissions, land use and intensive use of a several active substances. In many cases other production methods, such as IPM, have greater environmental benefits compared to organic production, and these should not be disregarded.

If increased organic production is to be successfully achieved, to prevent a collapse of prices on the organic market demand must be equally stimulated to take up production growth. Proposals in the Farm to Fork Strategy, such as the ambition for increased organic production ambition, must take market realities in the sector into account. These proposals must also be accompanied by adequate financial assistance to aid transition either through the Common Agricultural Policy or other EU funding.

### **Holistic environmental footprints must be the basis for upcoming proposals under the Farm to Fork Strategy**

EU fresh fruit and vegetable sourcing is primarily local but there is a need for the sector to operate in a global environment with opportunities for both EU exporters and importers. Movement of fresh produce through intra-EU trade and internationally facilitates the diversity of high-quality products available to consumers on supermarket shelves, which in turns stimulates current low levels of fruit and vegetable consumption. A holistic view of product environmental footprints must be the basis for upcoming proposals under the Farm to Fork Strategy. 'Local' is not always synonymous with higher environmental performance, and a sustainable food system in Europe should benefit from local, regional, national and international products that provide the highest environmental added value.

### **The fresh fruit and vegetable sector's ability to provide high quality, safe, nutritious and affordable food to consumers and adequate return for growers should not be compromised**

The Farm to Fork Strategy's ambitions for significant reductions in the use of fertilizers (-20%) and plant protection products (-50%) must not hamper the fresh fruit and vegetable sector's ability to provide high quality, safe, nutritious and affordable food to consumers and adequate return to growers. The reduction in availability of these vital tools must be complemented by replacement tools. Moreover effective alternative tools must be provided in emergency situations in order to cope with invasive species and plant diseases. The sector already uses as many biological and low-risk products as possible and chemical active substances are used only in situations when non-chemical substances cannot be replaced. While Freshfel Europe supports an increased use of non-chemical substances, it must be ensured that new non-chemical substances placed on the market replacements are equally as efficient, accessible and affordable for users as those chemical substances they are replacing. Furthermore, other alternatives must also be explored in tandem, such as effective IPM control tools, new breeding techniques and irradiation. Any new policy developments must be safe and acceptable for European consumers.

### Maintaining the competitiveness of the fresh fruit and vegetable sector is key

Long-term sustainability of the fresh fruit and vegetable relies heavily on maintaining the competitiveness of actors along the supply chain. New constraints imposed on production as proposed in the Farm to Fork Strategy, such as reductions in fertilizer and plant protection product use, will result in additional costs for growers and affect the competitiveness of EU production if non-EU suppliers are not complying with similar rules. To avoid market distortion and unfair competition production standards and rules must be taken into account in any proposals. Likewise stricter rules on imports into the EU may additionally result in food security issues as these third country suppliers may divert exports to more attractive and less demanding global markets. The resilience of the fresh fruit and vegetable sector should also be looked in terms of the global outlook. COVID-19 will likely cause a downturn in the global economy, which will hamper both the sector's ability to take on new costs and affect consumers' purchasing power for more costly products.

### 2020 and beyond

The successful implementation of regulatory and non-regulatory initiatives in the Farm to Fork Strategy will rely on strong engagement with industry partners. Due to the importance of the fresh fruit and vegetable sector's role in sustainable food systems and healthy sustainable diets, Freshfel Europe should continue to be closely consulted on the ensuing drafting of the Farm to Fork Strategy's proposed initiatives and measures. To this end, Freshfel Europe requests heightened collaboration with the European Commission services to ensure long-term support for the Farm to Fork Strategy's objectives and proposed initiatives as well as to provide a broader range of perspective to measures. Freshfel Europe looks forward to continued dialogue on the Farm to Fork Strategy into 2020 and beyond.