INTRODUCTION

European Coordination Via Campesina (ECVC), representing small and medium farmers committed to sustainable development and peasant agroecology, welcomed with satisfaction the European Commission (EC) Communication on the Farm to Fork (F2F) strategy with its ambitious targets to reduce pesticides, fertilisers and antimicrobials in Europe and to increase organic farming to at least 25% of EU agricultural land by 2030.

We recall that peasant agriculture is the agricultural component of a wider social project, which we want to be democratic, egalitarian and respectful of the environment. It is built around the notion of food sovereignty, as defined by La Via Campesina. Thus, this project does not only concern agricultural policies, but also food policies, which can structure the demand for the products of peasant agriculture.

ECVC sees a shift in the overall vision, with a focus on food, which is also central to ECVC’s vision of food sovereignty and the right to food for all. We also recognise the great value of farmers as food providers in local food systems under democratic control.

The COVID-19 crisis has increased the importance of resilient food systems and has shown the risks and negative consequences of external dependency and lack of food sovereignty in Europe.

However, although the model of sustainable family farming is more highly valued in the principles of the F2F strategy, we fear that in the implementation of the F2F measures small and medium-sized farmers will be excluded. It is necessary that the objectives of the F2F Strategy are realised in the different EU policies concerned, in particular the CAP, in order to support a real transition towards sustainable food systems based on agro-ecology.

On the other hand, ECVC considers that a profound change in other EU policies such as its trade policy is essential because of the lack of coherence with the objectives of the F2F. Continuing to promote free trade agreements that destroy sustainable agriculture and food and impose industrial agriculture and food is contrary to the objectives of the F2F.
CONSIDERATIONS

• More than 33 million European citizens cannot afford a decent meal every two days.
• Recognition of the importance of local markets and producer-consumer link has increased and has been further highlighted by the COVID-19 crisis.
• Small and medium-sized farms are disappearing at an astounding rate, in particular dairy farms (accounting for 60% of disappearances).
• Between 2003 and 2013 (EU-27), the number of holding on record went from 15 million to around 11 million. The vast majority of the farms that disappeared were peasant farms;
• In just 10 years, after 60 years of CAP subsidies, 25% of farms have been lost, which equates to 4 million farms or almost one farm per minute.
• Land concentration has increased exponentially, especially in Eastern Europe;
• Access to land for new farmers is prohibitively expensive.
• The relocation of production is increasing, leading to an agroindustrial model seen, for example, in a farm rearing 20,000 cows in Spain.
• In the EU-27, large farms generate only 5% of total agricultural employment, which shows that farmers and their families are crucial for job creation in rural areas.
• A large dairy farm needs only 1.9 work units to produce 1 million kilos of milk. In peasant agriculture, 3.3 work units are required. The investment required per unit of work is much lower in the case of peasant agriculture, therefore more jobs are created with less investment;
• Prices are often lower than production costs and are set by global markets and the CAP is export oriented.
• In most EU countries, the average income of farmers, even taking CAP subsidies into account, is around 50% of the average income of other citizens.
• FTAs do not protect small farmers, neither in Europe nor in third countries, and contradict EU environmental ambitions.
• European competition law only takes into account economic parameters;
• The position of farmers in the food supply chain deserves more attention;
• The livestock sector is subject to disproportionate “criminalization” in relation to the dynamic and sustainable benefits that this sector brings to rural areas.
• Animal feed still largely depends on imports of GMO soybeans from South American countries.
• The EC proposes the digitization of agriculture as a means of solving many problems, from climate change to the renewal of generations, and wishes to encourage new innovative technologies to improve sustainability and the food system, while ensuring its security. However, it’s hard to see concrete results in terms of sustainability.
• The technological devices of digital agriculture use minerals which are finite resources and which require a lot of energy, which still mainly comes from fossil fuels.
• The agroindustrial model is very dependent on fossil fuels because it is highly dependent on the import of factors of production, fertilizers, pesticides and animal feed rations, among other things, which require an enormous consumption of energy for their production. For example, a grazing livestock feeding system uses 50% less fossil fuel than an intensive feeding system, and grasslands are important CO2 traps.
• On the other hand, industrial agriculture, supported by delocalized consumption, implies an enormous consumption of energy, in particular for transport, refrigeration, packaging and food processing, among others, even before the foods reach the end consumer.
This relocation of crops with high labour requirements also involves the use of carcinogenic or mutagenic preservatives in imported products, such as the brines of fresh plant products like pickles, beans, etc.

- This excessive industrialization in the agricultural, food processing and distribution sectors means that poor nutrition has become one of the leading causes of death in Europe.
- The crisis produced by the pandemic of COVID-19 has also shown that the European agrarian model (both on an industrial and family scale) is dependant on a large, and mostly migrant, workforce who lives in conditions of instability, low wages and social and housing precariousness unworthy, which the health crisis has exacerbated even more. The situation worsens in the case of temporary workers, migrants and undocumented foreigners, in a situation of extreme vulnerability due to the systems of hiring at origin, temporary employment agencies and national regulations allowing deregulation.

**ECVC KEY MESSAGES FOR F2F AND CAP**

To be credible, the content of the F2F strategy must be truly ambitious and the reformed CAP and the National Strategic Plans must comply with it.

To implement food sovereignty and food security for European populations as locally as possible, ECVC notes the importance of the relationship between consumers and producers, and proposes to focus on the organising the market around healthy products and good quality. Farmers must have a decent and stable income, to engage in agroecological change, and workers must have stability and decent wages.

**1) MORE LOCAL AND MORE RESILIENT FARMS**

- Promote small and medium-sized farms and peasant farming models, mainly based on agroecological practices, as the only way to maintain dynamic rural areas and to fight climate change and the loss of biodiversity. Support diversity on the farm, such as farms with animals for both meat and milk.
- Promote grass-fed breeding and high-quality meat in all regions to maintain livestock farming in rural areas, as livestock keeps people in the countryside.
- Promote farm autonomy so that farmers can produce animal feed themselves and stop importing soybeans from South American countries; this autonomy in vegetable proteins is improved using organic manures as well as a rotation system which makes it possible to stop using pesticides and to improve resilience in the face of water stress. This is also true for crops of plants for human use, such as vegetables, legumes and cereals grown in mixed farming.
- Basing the improvement of animal welfare on the recognition of the link between animals, breeders and the environment, and the development of farming systems which respect animals and people at every stage of the chain.
- Support an exit plan for pesticides in agriculture by 2030, with clear and ambitious reduction targets, and the elimination of the most dangerous pesticides (endocrine disruptors, etc.) as soon as possible. We must stop considering the use of chemical molecules as the norm in technical itineraries, and instead see it as the exception.
- We need to ban mega-farms.
• We must support the conversion of intensive farms, and prioritise tackling excess production with regard to domestic consumption. This will be done by modifying production/extension methods, in order to reduce the quantities produced while ensuring the sustainability of the agricultural activity and food quality.
• Set and finance an ambitious level of conversion to organic farming in Europe by 2030.
• New genomic techniques are not the solutions to overcome the challenges that rural areas are facing today and must be subject to GMO regulations.
• Investment of financial funds in the agroforestry sector should be limited and not eligible for public aid.
• The national strategic plans for the CAP should reflect the objectives of more local and more resilient farming and subsidize small and medium-sized farms and the peasant farming model, as the only way to maintain dynamic rural areas.

2) SHORTER FOOD CHAINS, FOR FRESHER AND HEALTHIER FOODS AND INCREASED FOOD SECURITY

2.1 Facilitate short circuits
• The CAP and other policies should facilitate local agricultural markets by various means:
  - Establish appropriate hygiene and standard rules for processing products on the farm;
  - Finance the necessary local and collective equipment initiatives to permit local treatment (slaughterhouses suitable for small farms such as mobile slaughterhouses, options for vegetable processing, public kitchens and infrastructure for local markets (public halls or farm shops etc.);
  - Set targets to reduce the consumption of ultra-processed foods and frozen and chilled fruits and vegetables;
  - Public markets should spend at least 30% of public purchases on products from local farmers;
  - Reform and redistribute food aid so that quality products are accessible to the entire European population.

2.2 Fairer and more equitable long circuits
• We must give preference to the community once again.
• Prioritize production for the local market, not the export of products with low added value.
• Modify the EU competition rules so that they can take into account social, labour and environmental considerations and are adapted to favour local supply and short circuit.
• Set up a price and margin control system.
• Improve the position of farmers in the food supply chain by prohibiting, for example, selling at a loss at the farm level.
• Regulate the market so that prices can be set and regulated on the EU internal market and not on the world market.
• End free trade agreements because they weaken the agricultural sector in the name of the so-called competitive economy and are in contradiction with GD objectives of making Europe a carbon neutral continent by 2050.
• Include social conditionality and respect for human rights, including the Declaration on the Rights of Peasants (adopted in 2018) in all FTAs, and in the CAP.

3) GIVE A FUTURE TO YOUNG PEOPLE
• Many young people want to get involved in agriculture as a profession and it makes sense to feed people and protect nature, using peasant agroecology. They need access to land, not to own it, but to have secure access to the means of production. The EU needs to prepare a land directive to facilitate access for young people, protect the soil and prevent artificialisation of the land.
• More support for young innovative farmers. There is an abundance of initiatives around organic farming (agroforestry, permaculture, micro-farms, etc.), which must be given a chance in times of great uncertainty by increasing funding for the second pillar and by providing monthly support for the first 3 years, or asset support at the start of your career, instead of aid per hectare, and granting tax advantages for young farmers.
• Settling these young people in good conditions requires being able to pool production tools, in order to create small local production and processing cooperatives.
• Support agricultural salaried workers who want to settle as peasants on their own to have access to land and productive and financial resources.

4) MORE DEMOCRATIC AND FAIRER FOOD SYSTEMS
• Generalize local food councils, enabling a broad participation of local organizations and the local population and set up a European Council for sustainable food policy.
• Digitization must be organized in a reasonable and democratic manner to avoid overconsumption of energy and precious metals and the loss of democratic control over very sophisticated technologies.
• The problem of a lack of control and regulatory frameworks to protect data and information generated by farmers and appropriated by few industries must be corrected. In particular, the digitization of information specific to genetic resources should be considered as genetic resources and treated as such in accordance with the CBD and ITPGRAD standards.
• Protection of human, social and labour rights of agricultural workers in Europe must be a priority task to ensure a food system that is not based on the exploitation of any human being and that, on the contrary, is capable of dignifying and integrating people this fundamental group for food production, especially women, seasonal workers and migrants, due to their special situation of vulnerability. Discrimination, racist abuse, private, formal and informal intermediation systems, as well as any other regulation or practice that makes them vulnerable or deprives people of their documentation, their freedom of movement and union organization, should be forbidden.
5) AN IMMEDIATE BAN ON THE MOST DANGEROUS AND TOXIC PRODUCTS, NAMELY CMR (CARCINOGENIC, MUTAGENIC, REPROTOXIC) AND PE (ENDOCRINE DISRUPTORS)

The immediate ban of the most dangerous and toxic products, CMR (carcinogenic, mutagenic, reprotoxic) and EP (endocrine disruptors), in order to reduce the health risks associated with pesticides as much as possible. These bans must be coupled with a border ban on products treated with these same pesticides, as was done in the case of dimethoate.

More precisely:

a. Creating standards adapted to peasant agriculture: specific hygiene standards must be put in place for peasant producers at the European level and in national application. Adapted to their level of production - and not to that of the industry - they must obviously lead to administrative simplification. Controls by the health authorities must also be appropriate and strictly controlled. Environmental rules must be consistent so as not to effectively be responsible for the disappearance of small farms.

b. Re-establish peasant farming in the green belts of large conurbations to feed the people who live there, relocate trade and recreate social links between consumers and producers. This can be achieved by encouraging local elected representatives to implement proactive land policies in these areas and to give priority, in the professional bodies of the agricultural establishment, to projects based on short or local circuits.

c. There is a need to rethink and diversify crop rotation, manage soil organic matter, choose plant species and varieties wisely, de-intensify and encourage environmentally friendly farming systems.

In conclusion, it is clear that without a total overhaul of the CAP, which includes subsidies that are more linked to resources than to hectares and a reconsideration of the Free Trade Agreements, the results of the F2F will remain very limited.

February 2021