

Attn: Executive Vice-President Timmermans
European Commission, Rue de la Loi 200, 1040 Brussels

June 5, 2020

Re: Collective response from food sovereignty scholars on the Farm to Fork Strategy

Contact: nyeleniresearchersconstituency@lists.riseup.net

Dear Executive Vice-President Timmermans,

CC Commissioners: Stella Kyriakides, Virginijus Sinkevičius and Janusz Wojciechowski
CC Director Generals: Wolfgang Bartscher, Anne Bucher and Daniel Calleja Crespo
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On 20 May 2020 the European Commission (EC) released its new Farm to Fork (F2F) Strategy for a fair, healthy and environmentally-friendly food system. As scholars committed to supporting sustainable food system transformation, we commend the EC for delivering a longer term vision, and proposing the development of a legislative framework for sustainable food systems by 2023. Binding mechanisms and coherent, integrated rights-based legislative frameworks are fundamental to ensuring compliance and meeting the proposed targets. We acknowledge that the F2F Strategy contains many positive points, but are deeply concerned that these remain embedded in an outdated framework.

The evidence overwhelmingly points to a need to move beyond the (green) economic growth paradigm. This paradigm, reified by the European Green Deal, perpetuates unsustainable lock-ins and entrenched inequalities. The Scientific Advice Mechanism¹ recently advised the EC to stop treating food as a commodity and start thinking about the implications of seeing food more as a common good.² However, the EC failed to take up this recommendation in the F2F Strategy.

We appreciate that the F2F Strategy presents a food systems approach, from primary production to the consumer. This is needed to tackle the complexity of food and associated challenges. We also appreciate that the F2F Strategy includes targets on chemical pesticides, fertilizers, organic farming, antimicrobial resistance and that there are rewards associated with soil management strategies that sequester carbon. We encourage the EC to put in place rigorous monitoring and impact assessments to enforce and reinforce these.

We are also pleased that the relevance of the 'food environment' to addressing many food-related challenges is highlighted. Here, the commitment to develop an EU tax system that can ensure that the price of different foods reflects their real costs in terms of use of finite natural resources, pollution, Green House Gas (GHG) emissions and other environmental externalities is very welcomed. We support the F2F Strategy's commitment to create shorter food supply chains and the reduction of dependence on long-haul transportation, as well as

¹ Group of Chief Scientific Advisors. 2020. *Towards a Sustainable Food System*. Brussels.

² Vivero-Pol, J.L., T. Ferrando, O. De Schutter, and U. Mattei (eds). (2018) *Routledge Handbook of Food as a Commons*. Oxon: Routledge.

on unsustainable crops to feed the intensive animal industry. We commend the EC for recognizing that through imports the EU is promoting carbon leakage in other territories. We are encouraged to see the EC commit to developing policies that strengthen territorial networks, ecosystems and economies. Building on the premise highlighted by the F2F Strategy that all people need to benefit from a just transition, we insist that social inequalities within territories must be taken into consideration.

Recognizing these important contributions, we have a number of specific concerns about the F2F Strategy.

Production

Ensuring sustainable food production means concrete changes in business as usual. However, the F2F Strategy does not address the causes of our current challenges in sustainable and structural ways. The F2F Strategy fails to recognize that there are various food systems and production models in Europe and that issues such as pesticide and anti-microbial use, excess fertilization, biodiversity loss, labour exploitation, and unhealthy diets promotion are essentially linked to the industrial food system. This lack of recognition restricts the ability of the F2F Strategy to adequately support small-scale producers and peasant agriculture. Instead, the F2F Strategy highlights precision farming and the digital transformation of farms, with an active role for the financial sector, rather than public policies. This can lead to further promotion of farm concentration and accelerate the disappearance of small-scale farmers that are the core of agroecology and a sustainable food systems approach. In this regard, we note that post-2020 Common Agricultural Policy (CAP) National Strategic Plans will play a central role in achieving the goals of the F2F Strategy. While the Commission's CAP reform proposal has been deemed compatible with the Green Deal and the F2F Strategy³, we call on the EC to take the necessary legal, financial and practical measures to ensure there is full alignment between the F2F Strategy and the future CAP.

Agroecology

The F2F Strategy fails to recognize the role of agroecology in European food systems and its potential. In the F2F Strategy, agroecology is defined in a limited way, despite the ample recognition by farmers, social movements and international organisations of its key role in integrating ecological principles into the design and management of agricultural systems. While we are pleased to see a focus on new knowledge and innovations to scale up agro-ecological approaches in primary production, this should not be used to delay action. While more research is always valuable, there is already a wealth of peer-reviewed science about agroecology which provides evidence for immediate action.^{4,5} From this perspective, gene editing remains a false solution that should not be pursued - not only in light of the judgment of the EU Court of Justice,⁶ but as a matter of avoiding further privatization of food systems.

With regards to sustainable food production, and in the context of the current crises, more ambitious targets are needed to promote ecological practices that increase biodiversity and soil fertility, reduce erosion and contamination of soils, water and air, support adaptation to climate change and decrease energy consumption. The F2F Strategy highlights and recognizes the potential of organic farming, especially in relation to opportunities for youth,

³ European Commission, "[Analysis of links between CAP Reform and Green Deal](#)", SWD(2020) 93 final, 20 May 2020.

⁴ van der Ploeg, Jan Douwe, et al. 2019. "The Economic Potential of Agroecology: Empirical Evidence from Europe." *Journal of Rural Studies* 71:46–61.

⁵ De Schutter, Olivier. 2010. "*Agroecology and the Right to Food*", Report Presented at the 16th Session of the United Nations Human Rights Council [A/HRC/16/49]. New York.

⁶ Judgement of the Court (Grand Chamber) 25 July 2018. In Case [C-528/16](#).

but fails to adequately define organic agriculture. It also fails to pay enough attention to farm renewal, access to land and extensive livestock farming.

Access to natural resources

Food producers across Europe struggle with accessing quality and affordable land, but there are no measures in the F2F Strategy that tackle land concentration and the rising cost of land. New entrants face barriers including: access to land; training and start-up costs and access to markets.⁷ Yet, many are attracted to alternative food systems, short chains and community supported agriculture.⁸ These alternative supply chains, which most clearly fulfil the main objectives of the F2F Strategy (provision of accessible, healthy and sustainable food), surprisingly receive no attention in it. The F2F Strategy remains heavily geared towards the global food value chain, and pays no specific attention to youth, potential new entrants, and the diversity of people, cultures, and ecosystems that exist in Europe. As highlighted by the European Court of Auditor,⁹ support to young farmers should be better targeted if effective generational renewal is to be achieved.

The F2F Strategy recognises the importance of traditionally and locally-adapted seed varieties in building sustainable and healthy food systems. However, it fails to recognise the fundamental role played by farmers in managing agricultural biodiversity. Farmers' seed systems play autonomous and decisive roles in amplifying cultivated biodiversity, increasing the capacity to adapt to climate change and provide healthy diets. With regard to the proposal to facilitate the registration of seed varieties, we warn that such mechanisms impose individual rights on seeds in contravention to the provisions of Article 9 of the International Treaty on Plant Genetic Resources for Food and Agriculture, which recognises the right of farmers 'to save, use, exchange and sell farm-saved seed/propagating material' (article 9). The collective rights of farmers to produce, reproduce, save and exchange seeds, including genetic information that can be derived in digitised forms (DSI), should be recognised, prohibiting the imposition of patents on such material and the information contained therein. Any efforts at registration must follow the Nagoya Protocol and create the conditions for the use of these seeds without the obligation of registering them if the users so decide.

Workers

Our current food system is reliant on under-paid, undeclared and precarious farm and food sector workers operating in exploitative and sub-standard working conditions (most often women and migrants).¹⁰ The F2F Strategy supports job creation in the food and agriculture sector without clearly defining the types of jobs that will be created and for whom. Clear vision and leadership is required here and the F2F Strategy should ensure gender equality, secure and dignified working conditions and living wages. In this respect it is important to strengthen legal and safe channels for third-country workers, to reform migration and asylum policies (i.e. the Dublin Regulation), to facilitate the regularization of all migrants,¹¹ to support the implementation of equal treatment provisions covering all categories of workers, to promote social and economic inclusion in rural areas, and to introduce conditionalities on CAP payments based on respect for labour rights, developed with the participation of

⁷ Zondag, M.-J.; Koppert, S.; de Lauwere, C.; Sloom, P.; Pauer. 2015. A. *Needs of Young Farmers. Report I of the Pilot Project: Exchange Programmes for Young Farmers.*; European Commission: Brussels, Belgium.

⁸ Plank, Christina, Robert Hafner, and Rike Stotten. 2020. "Analyzing Values-Based Modes of Production and Consumption: Community-Supported Agriculture in the Austrian Third Food Regime." *Österreichische Zeitschrift Für Soziologie* 45(1):49–68. <https://doi.org/10.1007/s11614-020-00393-1>

⁹ European Court of Auditor (2017). [EU support to young farmers should be better targeted to foster effective generational renewal](#). *Special report No 10/2017*.

¹⁰ J.F. Rye and S. Scott, 2018, International Labour Migration and Food Production in Rural Europe: A Review of the Evidence, *Sociologia Ruralis*, 58: 928-952; F. Natale et al., 2019, *Migration in EU Rural Areas*, European Union, Luxembourg.

¹¹ A. Corrado, F.S. Caruso, M. Lo Cascio, M. Nori, L. Palumbo and A. Triandafyllidou, 2018, Is Italian Agriculture a "Pull Factor" for Irregular Migration – And, If So, Why?, Open Society European Policy Institute.

affected parties. Also, there is need to rethink the 2017 Dublin Regulation on migration and for the EU cooperate with member states so as to facilitate the regularization of all migrants (not only workers or farm workers).

Animals, livestock and fisheries

The lack of target on the reduction of the overall stock of animals, despite recognition that animals contribute 10.3% of GHG in Europe is concerning. We would like to see the EC take concrete measures to move away from and des-intensify industrialised animal farming, and promote sustainable extensive livestock and pastoralist systems, linked to vibrant territories and re-localised food chains. This will have a positive effect on both the promotion of sustainable and healthy diets and on the overall stock of animals. Where transport of livestock is necessary, there is a need for better enforcement, sanctions and reduced journey times,¹² while also supporting transhumant routes.

In general, the F2F Strategy remains rather silent on mobile pastoralism and extensive livestock systems. This sector has been damaged not only by agrarian policies oriented to industrial standards, but also environmental policies that ignored the role of pastoralism in nature protected areas. In this regard, agroecology contributes to achieving multiple goals, as it sees animals as key components of the circular production system of the farm. Further, agroecology contributes to innovations in traditional livestock management systems, promoting mixed and high-nature value landscapes and agro-silvo-pastoral systems. Emerging evidence indicates that holistic management, aligned with agroecological principles, has a number of positive environmental impacts, including soil regeneration and carbon sequestration, fire prevention and biodiversity increases.¹³

Given the importance of fisheries to the EU economy and diet, we found the focus on fisheries too limited, insofar as it focused only on the management of stocks in the Mediterranean and aquaculture. There is a lack of acknowledgement about the role of the Common Fisheries Policy (CFP) itself in facilitating overfishing and excessive by-catch. This is an issue which seriously impacts EU fisheries as well as other countries which have Sustainable Fisheries Partnership Agreements with the EU, thus opening up their marine resources to EU vessels, accelerating overfishing and displacement of local small scale fishers.¹⁴ The F2F Strategy fails to mention the urgent need to address the CFP's unequal distribution of quota that undermines the livelihoods of artisanal and small scale fishers inside and outside of the EU while benefiting the vessels which most contribute to overfishing in the first place.¹⁵ Meanwhile aquaculture is presented as a sustainable solution to overfishing, which obscures the ways that pressure can be simply shifted to wild fish stocks that are used for fish meal to feed farmed fish. Also overlooked in the F2F Strategy are the social consequences of transitioning to capital intensive aquaculture, which can fuel the concentration of control over fisheries resources and undermine small scale fisher livelihoods.¹⁶ EU policy needs to abandon the 'fish-stock' and 'maximum sustainable yield' approach to quotas, take into consideration the enforcement of existing regulations, but also adopt a regenerative and ecological understanding of sea life in the frame of ecosystem-based and adaptive management. While the F2F Strategy highlights

¹² See: <https://www.europarl.europa.eu/news/en/press-room/20190207IPR25224/meps-urge-eu-states-to-ensure-better-care-of-transported-animals>

¹³ Retallack, G. (2013) 'Global Cooling by Grassland Soils of the Geological Past and Near Future' in *Annu. Rev. Earth Planet. Sci.* 2013.41:69–86; Stanley and Rowntree et al. (2018) 'Impacts of soil carbon sequestration on life cycle greenhouse gas emissions in Midwestern USA beef finishing systems'. *Agricultural Systems* 162: 249–258; [COAG \(2018\)](#) Vingt-sixième session Rome, 1-5 Octobre 2018 Agroécologie – de la sensibilisation à l'action - FAO - COAG/2018/5

¹⁴ TNI. 2017. [EU Fisheries Agreements: Cheap Fish for a High Price](#). Amsterdam.

¹⁵ See for example the case of Bluefin Tuna: <https://lifeplatform.eu/bluefin-tuna-an-appeal-for-justice/>

¹⁶ Ertör, Irmak and Miquel Ortega-Cerdà. 2019. "The Expansion of Intensive Marine Aquaculture in Turkey: The next-to-Last Commodity Frontier?" *Journal of Agrarian Change* 19(2):337–60.

the importance of strengthening fishers' position in the supply chain, it does not prioritise clearly enough the position of small-scale and artisanal fishers, who are a cornerstone of resilient and sustainable food systems. Importantly, it also doesn't outline *how* the historic inequalities and unsustainable practices facilitated by the CFP will be reversed.

The role of cities

While we commend the focus on shorter food chains and the promotion of circular economies, we note that the F2F Strategy does not address the role that processes of urbanisation have in determining the structural, infrastructural and policy conditions that enable farmers to operate as stewards of ecological resources in urban and periurban contexts. For food production to happen closer to cities, and for a broader cultural and social engagement with sustainable farming, the F2F Strategy should acknowledge the role of cities in both the governance of natural resources (land, soils and nutrients) and the responsibility they have in devising education and training programmes and dedicated policies to support and enable the transition.

Consumption

While the F2F Strategy recognises the relevance of 'food environments', it fails to promote changes that can deeply transform these and enable healthy and sustainable diets for all. In that form, the economic growth narrative leads the F2F Strategy to fall into contradictions between a free and informed consumer choice approach and an intervention approach through legal and normative measures (apart from the tax). As highlighted above, we support the use of tax incentives to contribute to changing production and consumption patterns (e.g. organic fruit and vegetables). However, we are concerned that these tax incentives could end up benefiting industrial organic farming rather than small-scale farmers. We are also worried with the lack of consideration of actions targeted to ensure low-income families' access to healthy and sustainable food.

The F2F Strategy has a focus on adapting marketing and advertising strategies taking into account the needs of the most vulnerable (e.g. kids); yet, it fails to take the next step in restricting these. There is evidence that aiming to empower consumers through information and/or labelling is not enough to change consumer choices.^{17,18} Rather, the food environment and access to affordable sustainable, healthy and culturally appropriate food for everyone should be the objective. The F2F Strategy dedicates particular attention to the 'rights' of consumers to choose among different products and the importance that labelling has in directing this action. Although we appreciate the importance of transparency and the role that information plays in improving consumption habits, the F2F Strategy does not pay enough attention to the multiple structural constraints that often define consumers' possibility to choose (financial precarity/relative poverty, living in a food desert, etc.).

Towards this end, the F2F Strategy adds little on how to obtain a more ideal food environment, or how to provoke related dietary consumption shifts for those who most need it, recognizing inequalities in access to healthy food. There is mention of the need to reduce red meat consumption, which has also been recommended by the Intergovernmental Panel on Climate Change.¹⁹ However, the F2F Strategy remains unclear on how this reduction can be achieved. Finally, it is regrettable that despite advocating for informed consumer choices, education to

¹⁷ SAPEA. 2020. *A Sustainable Food System for the EU*. Brussels.

¹⁸ HLPE. 2017. *Nutrition and Food Systems*. Rome: Committee on World Food Security.

¹⁹ Intergovernmental Panel on Climate Change. 2019. [Climate Change and Land](#). An IPCC Special Report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems.

children on agriculture and healthy and sustainable diets is not considered in the F2F Strategy.²⁰

In addition, the F2F appears to suggest that the only role of European people in the construction of a sustainable food system is that of voting with their wallets and consuming: this dismisses the political nature of food and food systems and the fact that Europeans are first of all citizens with the right to vote and the right to be directly involved in democratic and open processes around the future of their food, a key element of food sovereignty.

Trade

As the primary food importer and food exporter in the world, the EU needs to show leadership and induce changes in international trade regimes so as to prioritize social and environmental justice. We are pleased to see that the EU is prepared to lead by example and support transitions towards more sustainable practices by our trading partners.

We are disappointed that the F2F approach provides only a generic indication of cooperation for the Green Alliance on sustainable food systems and promotion of food security by means of international development to trade, while providing no indication of specific linked objectives to the social sustainability of food systems or a budget to favour the global adaptation of standards. There is a lack of discussion on the distortive role of Green box subsidies, which represent the biggest part of the CAP subsidies, as long as priority is given to export (i.e. through CAP and the Next Generation EU recovery plan).

Governance

Within the F2F Strategy, different governance mechanisms, actors and spatial scales are mentioned, but a democratic approach is lacking. We have seen with the COVID-19 crisis that sustainable, decentralized food systems linking rural to urban environments are indispensable and more resilient than long-distance chains to shocks. These re-localized food systems need to be supported by the state, but this won't be possible so long as the focus remains on competitiveness and thus on economic growth and the capitalist market. A multi-level governance approach would favour the guarantee of human rights and the democratization of decision-making spaces. In that regard, we regret that the F2F Strategy advances a vision for change that puts high hopes in corporations and consumers as drivers of change but ignores farmers, food workers, citizens and social movements as crucial agents of food system change.

International cooperation and multilateral fora

The scant reference to the objectives of EU international cooperation reads like a shopping list rather than a carefully thought-out policy orientation to support territorial food systems based on small-scale agroecological production and privileging family farmers' access to domestic markets. Instead, the current trend to use public cooperation funds to 'crowd in' European private sector investments in agriculture leads to the producers' incorporation into agribusiness-led value chains in which they lose the autonomy which is the basis of their resilience.

We regret that 'transversal objectives such as human rights, gender and peace' are promised only 'due consideration' whereas they should be the guiding principles of the entire F2F Strategy.

Finally, we regret that the reference to relevant multilateral fora cites the UN Food Systems Summit, highly deficient in transparency and legitimacy, and neglects to mention the UN

²⁰ FAO. (2016). [Report of the Regional Symposium on Agroecology for Sustainable Agriculture of the Regional Symposium](#). Rome.

Committee on World Food Security, the only global food policy forum in which the small-scale producers who feed the world and other social constituencies are full participants.

Research and Innovation

We are concerned that the Research and Innovation (R&I) approach outlined in the F2F Strategy is framed as overtly technical, thereby not only overlooking social innovation, but also social science and humanities research. These are crucial in the endeavour to understand and drive the complex social transformations necessary to achieve just and sustainable food systems.²¹

The claims of the F2F Strategy related to the bio-economy, bio-based (circular) economy and biotechnology are not detailed enough to give clear directions to research that is ethical and that promotes sustainable farming. Such research needs to be designed in cooperation with farmers and citizens. With respect to encompassing a systemic vision, the F2F Strategy fails to explicitly incorporate R&I processes linked to power concentration, territories and people, increasing access to seeds, land and water, and developing and supporting food and kitchen cultivation projects that guarantee the right to healthy and nutritious food and are founded on principles of social justice. We are concerned that the heavy focus on digitalization can lead to capital intensive modes of production and in turn dependency and further reduction in the number of small-scale EU farms.

As researchers, we are concerned about the financing of the F2F Strategy and the role that private capital may play in defining the future of the EU food system. We consider it necessary to specify the parameters and requirements related to the objectives of R&I investments and their impacts and we question the applicability to the F2F context of an EU taxonomy on green investments that upholds the logic and interests of financial actors rather than the interests of food producers and communities. For this reason, we consider that, rather than opening the doors to sustainable finances aimed at supporting capital intensive projects and speeding up the digitalization of low hanging fruits, the F2F Strategy must favour mechanisms for ethical finance that supports cooperatives and mutualism. Such mechanisms should be more aligned to the scale and reality of agroecological production.

In light of these concerns, we recognize that important steps have been made with this F2F Strategy. We also recognize the challenges associated with developing an ambitious F2F Strategy for complex food systems during a moment of compounding crises. Once again however, policy lags behind scientific evidence and we are adamant that the F2F Strategy does not go far enough to ensuring diverse, sustainable and just food systems for all in the EU.

We are prepared to work with the EC to address the concerns raised above to drive forward a more ambitious F2F Strategy for a fair, healthy, rights-based and environmentally-friendly food system.

²¹ 'Just sustainabilities' highlights the need to consider the well-being of future generations in any understanding of sustainable food justice, attending not only to inter-generational justice, but also intra-generational justice. See: Agyeman, J.; Bullard, R.D.; Evans, B. Just Sustainabilities: Development in an Unequal World; Earthscan: London, UK, 2003.

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