



30 June 2023

## **Defining Sustainability: European Coordination Via Campesina's recommendations to the European Commission for the Sustainable Food System legislative initiative**

The European Coordination Via Campesina (ECVC) is a confederation of unions and organisations of peasant farmers, small and medium-scale farmers, and agricultural workers across Europe. We are currently composed of 31 organisations from 21 European countries. Rooted in the right to Food Sovereignty, its main objective is the defence of farmers' and field workers' rights, promoting diverse and sustainable family and peasant farming, thus ensuring the right to healthy, fresh and affordable food to all citizens.

The present contribution is built on our recent recommendations of [directions for Sustainability of Food Systems](#) which stressed the most important and urgent issues. We are now complementing it to offer ways to define, assess and monitor key aspects of sustainability. It is not an exhaustive list but selected items only. The environmental dimension may not be the most reflected dimension here.

### **General provisions and definitions**

As stressed in an EU Scientific opinion in March 2020 **“Food must be viewed more as a common good rather than a consumer good, as been the tendency in the past”<sup>1</sup>**  
A sustainable food system needs to fully respect human rights, especially the right to food. We here importantly refer to our policy brief stating that [Human rights must be placed at the heart of EU food systems transformation](#)

#### **Defining Sustainable food system**

The FAO definition can be the basis:

*“A sustainable food system is one that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generation is not compromised. This means that it is profitable throughout, ensuring economic sustainability, it has broad-based benefits for society, securing social sustainability, and that it has a positive or neutral impact on the natural resource environment, safeguarding the sustainability of the environment.”<sup>2</sup>*

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1 European Commission, Directorate-General for Research and Innovation, Group of Chief Scientific Advisors, Towards a sustainable food system : moving from food as a commodity to food as more of a common good : independent expert report, Publications Office, 2020, p7.

<https://data.europa.eu/doi/10.2777/282386>

2 FAO, 2018, Sustainable food systems Concept and framework. Available at : <https://www.fao.org/3/ca2079en/CA2079EN.pdf>



To this the following provisions must be added:

- It is of utmost importance to always consider sustainability with its 3 dimensions: economic, ecological, and social which includes health, culture and political aspects. Even though the present document does not focus on the environmental dimension, we wish to insist on the importance of it.<sup>3</sup>

- A product cannot be sustainable, only a system can. We value the presentation of sustainability with multi-direction parameters diagrams, which need to reflect crucial aspects of sustainability. Its three dimensions will have to be fulfilled simultaneously to claim sustainability.

These aspects will be further developed below.

### **Food sovereignty**

Food sovereignty must be understood as defined in the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas, UNDRP<sup>4</sup>. That is to say *“the right to define their food and agriculture systems and the right to healthy and culturally appropriate food produced through ecologically sound, and sustainable methods that respect human rights »* It combines sustainability with democracy. It is not to be confused with food security.

## **Minimum sustainability requirements**

### **Concentration of the food system, jobs, rural life and health**

The main threat for the social sustainability of food systems in Europe is the growing concentration of retailing, processing, and in-line production, with a concentration of capital and market power in the system. This is leading to a strong pressure on wages, to job losses and by extension, the loss of vitality in rural areas, the breakdown of rural social systems and little incentive for young people, farmers and families to settle.

Farms get bigger and more specialized, with less biodiversity and more inputs. This also leads to more processed and highly processed food, detrimental to health.

**This system concentration must be stopped, with re-territorialisation of food systems<sup>5</sup>, and assessed with minimum criteria as follows :**

**Number of farms and jobs in agriculture**

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<sup>3</sup> For more information on that aspect, we suggest the reading of ECVC Manifesto for Agricultural Transition to Address Systemic Climate Crises, 2022, <https://www.eurovia.org/publications/manifesto-for-agricultural-transition-to-address-systemic-climate-crises/>

<sup>4</sup> United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas, Resolution adopted by the UN General Assembly on 17 December 2018. Available online: <https://undocs.org/A/RES/73/165>

<sup>5</sup> On the reterritorialisation of the animal farming sector, the following reference can be used: European Coordination Via Campesina, 2023, Livestock in Europe: Supporting an ambitious transition to peasant farming. Brussels. Available online : <https://www.eurovia.org/publications/livestock-farming-in-the-european-union-supporting-an-ambitious-transition-to-peasant-farming/>



Small-scale farms, with an agroecological approach are proven to emit less emissions than industrialized ones. The drastic fall of farms quantity must stop and on the contrary, they must increase, and in first priority in regions where farm loss leads to lack of fresh products, especially fruits and vegetables. The EU food system must be less dependent on transformed or imported products as this will increase food security in times of crises.

Ensuring a sustainable transition to more agroecological practices for all farmers is needed.

**To this aim, special attention must be given to the stability and viability of income. This entices regulation of markets to ensure decent prices and decent compensation for those working in the fields.**

**Criteria** : Evolution in the number of farms – average and distribution of size - **Farmers average income and differences.**

### **Generation renewal**

Barriers to access agricultural activity have long been identified: access to land<sup>6</sup>, access to finance, access to markets and fair remuneration for work, access to knowledge and training. A fair and dignified income and a decent quality of life for farmers and their families are essential conditions for attracting young people and newcomers to the agricultural sector.

- Link between the Common Agricultural Policy and generational renewal: This is one of the objectives of the CAP and must remain a priority. More can be done, including reducing the administrative burden, making investment aid available throughout the budget period and reviewing the age of access to aid.

-Agroecology: Young people are more inclined to adopt agroecological practices as well as “seize the opportunities presented by digital transformations”.

**Criteria** : Renewal rate – Evolution of the average age of farmers

### **Social conditions of farm and agriculture workers**

Social conditionality is now included in the CAP. This criteria must be fully respected, including for imported products so that operators are on an equal footing, and the situation of all workers improved.<sup>7</sup>

### **Fair access to good food for all people**

A system can only be considered sustainable if every single person has access to decent, fresh food, and notably poorest people. Poor quality diet with too much highly-processed food full of empty calories, salt, sugar and fat also leads to non-communicable diseases ( obesity and diabetes, heart diseases...). It should be a priority in food policies.

**Criteria** : (evolution of) number of people food insecure and obesity rate

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<sup>6</sup> For more information please see : ECVC, 2023, Proposal for an EU Directive on Agricultural Land, Bruxelles. Available at: <https://www.eurovia.org/publications/proposal-for-an-eu-land-directive/>

<sup>7</sup> For more information on the implementation, ECVC, 2021, Proposals to implement Social Conditionality in the CAP. Please see: <https://www.eurovia.org/news/ecvcs-proposals-to-implement-social-conditionality-in-the-cap/>



## **GMOs, including new GMOs, such as New breeding or Genomic Techniques (NBT- NGT), cannot be considered sustainable**

There is currently a strong push to impose new manipulated seeds with a new regulation that would exempt certain new varieties from traceability, under the guise of “sustainability”, also claiming that these seeds are supposedly able to resist drought or pests. ECVC and many organisations claim that traditionally and locally-adapted seeds result of the dynamic management of biodiversity in fields by farmers. Those one are absolutely crucial to ensure sustainability.<sup>8</sup> They have proved to be more resilient and notably in the current period of climate change when each territory becomes more vulnerable to extreme changes. So far, GMOs have failed to prove that they can solve problems. They’ve led to monocultures and increased use of pesticides<sup>9</sup>, they have trapped farmers into an unbearable economic model, extremely dependent on externalised input supply chain.

New GMOs, like all GMOs are covered by patents, which strengthen the control on seeds by a few corporations on the food system which makes that food security would increasingly depend on the good will of corporations. Five corporations control about 50% of commercial seeds.

**Law should ensure labelling and traceability of all GMOs (old and new)**

**Collective rights of farmers to produce, reproduce, save, exchange and sell 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.**

## **Fair governance of the food systems**

Democracy is a cornerstone of sustainability, and participation of all parts of society needs to be insured in all decision processes and at all levels.

The European Commission promotes committees at local, regional and national level for an inclusive approach to more sustainable food systems. ECVC fully supports this idea, and some good examples already exist in some countries and regions.

There is also a need for such a holistic approach at European level to give a good direction and impetus for a fair evolution of food systems. The European Economic and Social Committee together with the Committee of Regions could facilitate such a space in an inclusive manner, as they combine expertise of discussion among various professional, social and territorial constituencies, and could therefore ensure inclusiveness. The Advisory group which operates for the moment (AGSFS) mostly gathers business stakeholders and doesn’t have the capacity to address all the dimensions of food systems.

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<sup>8</sup> See this open letter, sign by over 300 organisations. 2023, Time to shift to evidence-based decision making for sustainable food systems and nature, Brussel s <https://www.eurovia.org/news/three-hundred-organisations-call-on-vice-president-of-eu-commission-to-keep-new-gmos-regulated/>

<sup>9</sup> Foodwatch, 2023, New Genomic Techniques (NGTs) won't reduce pesticide use in the EU, Brussels. Available at : <https://www.foodwatch.org/en/new-genomic-techniques-ngts-wont-reduce-pesticide-use-in-the-eu>



For policy coherence, more DGs like TRADE, REGIO or COMP, should be involved , as the four – SANTE, AGRI, ENVI and MARE – which are involved at the moment are not sufficient to cover the scope of food systems.

At the global level, ECVC wishes to draw attention on multi-actor initiatives, led by corporations in non-transparent public-private partnership that go against democratic participation of farmers and citizens, like the UN Food Systems Summit and its development.

We call the Commission to fully respect democratic processes and human rights, and in particular the right to participation of peasants as enshrined in the UN Declaration on the rights of peasants (UNDROP)<sup>10</sup>

**With all the European citizens, we claim “nothing about us without us”**

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<sup>10</sup> Link to the Declaration in all languages, and just press the right option:  
<https://undocs.org/A/RES/73/165>