

The Farm to Fork Strategy implications for agriculture and the CAP



RESEARCH FOR AGRICULTURE COMMITTEE

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Abstract

The aim of this In-Depth Analysis prepared by the Policy Department for Structural and Cohesion Policies is to explore the possible implications of the Farm to Fork Strategy (F2F) for agriculture and the CAP and, as a result, on the legislative works of the AGRICULTURE Committee over the 2020 - 2023 period.

The analysis is based on the following sources: the [Communication on the European Green Deal](#) (COM (2019) 640 of 11 December 2019); the [EC roadmap and key actions](#) of the European Green Deal (11 December 2019); the [EC F2F Strategy roadmap](#) (17 February 2020); the [Communication 'A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system'](#) (COM (2020) 381 of 20 May 2020); the [Draft Action Plan of the Farm to Fork Strategy](#) (Annex of the EC Communication of 20 May 2020); the [Commission staff working document 'Analysis of links between CAP reform and Green Deal'](#) (SWD (2020) of 20 May 2020); and [other background documents accompanying the F2F Communication](#) of 20 May 2020.

This document was prepared for the European Parliament's Committee on Agriculture and Rural Development.

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1. BACKGROUND

1.1. The European Green Deal in the time of Coronavirus

On 28 November 2019 the European Parliament approved a resolution declaring a climate and environmental emergency in Europe and globally ([P9 TA \(2019\)0078](#)), ahead of the UN Climate Change Conference (COP25) on 2-13 December. In a separate resolution of the same day, the European Parliament also urged the EU to submit its strategy to reach climate neutrality as soon as possible, and by 2050 at the latest, to the UN Convention on Climate Change ([P9 TA \(2019\)0079](#)) (Point 23).

The **Communication of the 'European Green Deal'**, published by the European Commission on 11 December 2019 ([COM \(2019\) 640](#)) launched the debate on the strategy to become '*the world's first climate-neutral continent by 2050*'. On 15 January 2020 the European Parliament adopted a new resolution welcoming the initiative ([PA TA \(2020\)0005](#)). MEPs called for an increase in the EU's greenhouse gas emissions reduction target for 2030 to 55% compared to 1990 levels (instead of 'at least 50% towards 55%', as proposed by the European Commission) (Point 13). The EP's resolution also stressed the importance of strengthening social dialogue at all levels and sectors in order to ensure a just and inclusive transition towards a climate-neutral economy (Point 6). Finally, MEPs requested that the Commission analyse the contribution of the CAP reform proposal against the goals set in the European Green Deal (Point 58).

However, the European Green deal goes well beyond just climate policy. It includes an EU's **new sustainable growth model** emphasising that decarbonisation, sustainability, protection of natural resources, public health, and economic competitiveness must go hand-in-hand. In spite of the **COVID-19 crisis**, the urgency of climate change mitigation and the need of sustainable growth have not disappeared. The EU's Green Deal measures and investments can become strategic building blocks supporting the post-coronavirus recovery. In this regard, it should be pointed out that the employment and value added in the EU 'environmental economy' grew faster than the overall economy between 2000 and 2016 ([Eurostat - Environmental economy statistics](#)) ⁽¹⁾.

Therefore, the broad Green Deal package defines the **key political guidelines** of von der Leyen's Commission for the next five years. The new EU's flagship framework confirms the need for a cross-sectoral, coherent and holistic approach, but also a territorial dimension, which is crucial for agricultural resources and biodiversity.

1.2. Overview of the European Green Deal and the policy implications for farming and food systems

The strands of the European Green Deal are strongly interlinked and mutually reinforcing to transform the Union into a resource-efficient, climate-friendly and competitive economy. Many policy initiatives of the package directly or indirectly affect the agriculture and the agri-food sector. The attached **BOX 1** illustrates the various regulatory and non-regulatory, **measures programmed for 2020/2021** in order to create more efficient, healthy and climate-smart agri-food systems while, at the same time, securing a decent living for EU farmers.

¹ See also: '[The European Green Deal after Corona. Implications for EU Climate Policy](#)', CEPS Policy Insights, N° 2020-06, March 2020.

BOX 1

THE EUROPEAN GREEN DEAL AND THE AGRI-FOOD SYSTEM

Based on the indicative policy roadmap announced by the EC Communication on the Green Deal

(COM (2019) 640 of 11 December 2019)

(Measures by objectives / concerns; in chronological order)

- **AGRI-FOOD CHAIN CONCERNS: Designing a fair, healthy and environmentally-friendly agri-food system**
 - **20 May 2020:** *'Farm to Fork Strategy' Communication* (COM p. 11, 13 and 14; Annex P.3)
 - **By 2020/2021:** *Organic farming action Plan* (COM p. 12)
 - **By 2020/2021:** *Long-term vision for rural areas* (COM p. 23)
 - **By 2021:** *Examination of the draft CAP National Strategic Plans* (COM p. 12; Annex p. 3)
 - **By 2021/2022:** *New measures to reduce the use of fertilizers, antibiotics and the use and risk of chemical pesticides* (COM p. 12-13; Annex p. 3)
- **SUSTAINABILITY AND CLIMATIC CONCERNS: Resource-efficient, circular and low-carbon economy**
 - **4 March 2020:** *European Climate Pact* (COM p. 22; Annex p. 4)
 - **4 March 2020:** *First European 'Climate Law'* (COM p. 4; Annex p. 2)
 - **10 March 2020:** *A new Industrial Strategy for Europe* (COM p. 7; Annex p. 2)
 - **11 March 2020:** *Circular economy action plan* (COM p. 7; Annex p. 2)
 - **By Summer 2020:** *Comprehensive Plan increasing the EU Climate targets* (COM p 4; Annex p. 2)
 - **From 2020:** *Legislative waste reforms* (COM p. 8; Annex p. 3)
 - **By 2020:** *New EU Strategy on Adaptation to Climate Change* (COM p. 5; Annex p. 2)
 - **By June 2021:** *Revision of LULUCF Regulation* (COM p. 5; Annex p. 2)
- **BIODIVERSITY CONCERNS: Protecting, conserving and enhancing natural capital**
 - **20 May 2020:** *EU Biodiversity Strategy for 2030* (COM p. 13; Annex p. 3)
 - **By 2020:** *New EU Forest Strategy* (COM p. 13; Annex p. 3)
 - **By 2020:** *8th Environmental Action Plan* (COM p. 23; Annex p. 4)
 - **From 2020:** *Measures to support deforestation-free value chains* (COM p. 13; Annex p. 3)
 - **From 2021:** *Specific measures to address the main drivers of biodiversity loss (from 2021)* (COM p. 13; Annex p. 3)
- **HEALTHY AND WELL-BEING CONCERNS: Safeguarding from environmental risks to health and well-being**
 - **By 2021:** *Zero pollution action plan for water, air and soil* (COM p. 14; Annex p. 4)
- **TRADE POLICY CONCERNS: Trade policy concerns: strengthening sustainable development commitments and compliance with EU food standards at the global level**
 - **From 2020:** *Trade negotiations* (COM p. 21; Annex p. 4).

We have identified **at least 20 policy actions** with more or less impact on the agri-food supply chain. They fit within different objectives (**BOX 1**):

- 1) designing a fair, healthy and environmentally-friendly food system (**agri-food chain component stricto sensu**);
- 2) building a resource-efficient, circular and low-carbon economy (**sustainability and climatic component**);

- 3) protecting, conserving and enhancing natural capital (**resources conservation/biodiversity component**);
- 4) safeguarding from environmental risks to health and well-being (**healthy and well-being component**); and
- 5) strengthening sustainable development commitments and compliance with EU food standards at the global level (**trade component**).

Some of the planned actions have already been published **between January and May 2020** (see links ⁽²⁾).

The **Farm to Fork Strategy (F2F)** stands out among these multiple initiatives as the **flagship agri-food element of the European Green Deal**.

2. THE FARM TO FORK STRATEGY: SCOPE AND GUIDELINES

2.1. Structure of the F2F Communication

On 20 May the European Commission unveiled the Communication '**A Farm to Fork Strategy - For a fair, healthy and environmentally-friendly food system**' ([COM \(2020\) 381](#)) with the goal of providing European citizens with nutritious, affordable and safe food. In fact, it is the first time that the European Commission presents a comprehensive approach covering every step in the food supply chain from production to consumption and supporting farmers' adaptation.

The **body of the text** is divided into **five sections**:

- 1) an **introduction** explaining why a transition to sustainable food systems is urgently needed;
- 2) **the way forward** to achieve the EU vision on the future agri-food systems, establishing overarching objectives and policy targets;
- 3) **enabling factors** supporting a fair transition and turning challenges into opportunities for sustainable growth (research, investments, full involvement of stakeholders, advisory services);
- 4) **EU external policies contributions** to promoting the global transition to sustainable agri-food systems (through the development of Green Alliances at bilateral/multilateral level, new trade agreements, international initiatives on food research and innovation, cooperation with third countries, etc.); and
- 5) **conclusions**, ensuring that the F2F Strategy will be implemented in close coherence with the other components of the Green Deal and announcing that this strategy will be **reviewed by mid-2023** to assess whether the action taken is sufficient to achieve the objectives or whether additional actions are needed.

The **Annex** of the F2F Communication presents a **Draft Action Plan** laying out a swathe of new policy actions revising and/or strengthening the EU current food and farming regulations. The list of legislative proposals and non-regulatory initiatives is accompanied by an **indicative timetable** for each of the actions planned for the period 2020 - 2023. The Annex shows a big picture perspective on the F2F Strategy and consequently becomes the operational core of the Communication.

² On 14 January 2020 the European Commission presented the [European Green Deal Investment Plan and the Just Transition Mechanism](#). This proposal does not directly affect the agri-food sector and it is not mentioned in BOX 1.

2.2. The agricultural playing field of the F2F Strategy

The F2F Strategy comes under the Executive Vice-President of the EU Green Deal, Frans Timmermans. It formally involves a large number of Directorate Generals (DGs) of the European Commission: **Agriculture and Rural Development (AGRI)**, Competition (COMP), International Cooperation and Development (DEVCO), Environment (ENVI), Internal Market & Industry (GROW), Health and Food Safety (HEALTH), Maritime Affairs and Fisheries (MARE) and Trade. However, the DGs involved do not always do so independently. The progress of the F2F Strategy will be led by the Commissioner for Health and Food Safety, Stella Kyriakides, and, consequently, DG HEALTH will play a hegemonistic role.

BOX 2

THE FARM TO FORK DRAFT ACTION PLAN (ANNEX OF F2F COMMUNICATION) - I

ACTIONS RELATED TO THE F2F OBJECTIVES INVOLVING DG AGRI (9 actions in total)

- **HORIZONTAL OBJECTIVE. Legislative framework improving sustainable food systems and ensuring food security**

***Action 2.** Develop a contingency plan for ensuring food supply and food security (Lead DG: (DG involved: AGRI, MARE & HEALTH) (Timetable: Q4 2021).*

- **FOOD PRODUCTION OBJECTIVE: Ensuring sustainable food production (All actions led by DG AGRI)**

***Action 3.** Adopt recommendations to each MS addressing the nine specific objectives of the CAP, before the draft CAP Strategic Plans are formally submitted (Other DG involved: ENI & SANTE) (Timetable: Q4 2020)*

***Action 9.** Proposal for a revision of the Farm Accountancy Data Network Regulation to transform it into a Farm Sustainability Data Network with a view to contribute to a wide uptake of sustainable farming practices (Timetable: Q2 2022)*

***Action 10.** Clarification of the scope of competition rules in the TFEU with regard to sustainability in collective actions (Other DG involved: COMP) (Timetable: Q3 2022)*

***Action 11.** Legislative initiatives to enhance cooperation of primary producers to support their position in the food chain and non-legislative initiatives to improve transparency (Other DG involved: COMP) (Timetable: 2021-2022)*

***Action 12.** EU carbon farming initiative (Other DG involved: ENVI) (Timetable: Q3 2021)*

- **FOOD PROCESSING AND DISTRIBUTION OBJECTIVE: Stimulating sustainable food processing, wholesale, retail, hospitality and food services' practices (All action led by DG AGRI)**

***Action 18.** Proposal for a revision of EU marketing standards for agricultural, fishery and aquaculture products to ensure the uptake and supply of sustainable products (Other DG involved: MARE) (Timetable: 2021 - 2022)*

- **FOOD CONSUMPTION OBJECTIVE: Promoting sustainable food consumption, facilitating the shift towards healthy, sustainable diets (All actions lead by DG AGRI)**

***Action 24.** Review of the EU promotion programme for agricultural and food products with a view to enhancing its contribution to sustainable production and consumption (Timetable: Q4 2020)*

***Action 25.** Review of the EU school scheme legal framework with a view to refocus the scheme on healthy and sustainable food (Timetable: 2023)*

BOX 3

THE FARM TO FORK DRAFT ACTION PLAN (ANNEX OF F2F COMMUNICATION) - II ACTIONS RELATED TO THE F2F OBJECTIVES LED BY DG HEALTH AND FOOD SAFETY

- **HORIZONTAL OBJECTIVE. Legislative framework improving sustainable food systems and ensuring food security**

Action 1. Proposal for a legislative framework for sustainable food systems (DG involved: ENVI & GROW) (Timetable: 2023)

- **FOOD PRODUCTION OBJECTIVE: Ensuring sustainable food production**

Action 4. Proposal for a revision of the Sustainable Use of Pesticides Directive to significantly reduce use and risk and dependency on pesticides and enhance Integrated Pest Management (Timetable: Q1 2022).

Action 5. Revision of the relevant implementing Regulations under the Plant Protection Products framework to facilitate placing on the market of plant protection products containing biological active substances (Timetable: Q4 2021)

Action 6. Proposal for a revision of the pesticides statistics Regulation to overcome data gaps and reinforce evidence-based policy making (Timetable: 2023)

Action 7. Evaluation and revision of the existing animal welfare legislation, including on animal transport and slaughter of animals (Timetable: Q4 2023)

Action 8. Proposal for a revision of the feed additives Regulation to reduce environmental impact of livestock farming (Other involved DG: ENV) (Timetable: Q4 2021)

- **FOOD PROCESSING AND DISTRIBUTION OBJECTIVE: Stimulating sustainable food processing, wholesale, retail, hospitality and food services' practices**

Action 15. Launch initiatives to stimulate reformulation of processed food, including the setting of maximum levels for certain nutrients (Timetable: Q4 2021)

Action 16. Set nutrient profiles to restrict promotion of food high in salt, sugars and/or fat (Timetable: Q4 2022)

Action 17. Proposal for a revision of EU legislation on Food Contact materials to improve food safety, ensure citizens' health and reduce the environmental footprint of the sector (Other DG involved: ENVI) (Timetable: Q4 2022)

Action 19. Enhance coordination to enforce single market rules and tackle Food Fraud, including by considering a reinforced use of OLAF's investigative capacities (Timetable: 2021-2022)

- **FOOD CONSUMPTION OBJECTIVE: Promoting sustainable food consumption, facilitating the shift towards healthy, sustainable diets**

Action 20. Proposal for a harmonised mandatory front-of-pack nutrition labelling to enable consumers to make health conscious food choices (Timetable: Q4 2022)

Action 21. Proposal to require origin indication for certain products (Timetable: Q4 2022)

Action 22. Determine the best modalities for setting minimum mandatory criteria for sustainable food procurement to promote healthy and sustainable diets, including organic products, in schools and public institutions (Other DG involved: GROW) (Timetable: Q3 2021)

Action 23. Proposal for a sustainable food labelling framework to empower consumers to make sustainable food choices (Timetable: 2024)

- **FOOD LOSS AND WASTE PREVENTION OBJECTIVE: Reducing food loss and waste**

Action 26. Proposal for EU-level targets for food waste reduction (Timetable: 2023)

Action 27. Proposal for a revision of EU rules on date marking ('use by' and 'best before' dates) (Timetable: Q4 2022)

It is important to emphasise that **DG AGRI is only involved in nine specific policy actions** (2, 3, 9, 10, 11, 12, 18, 24 and 25) among the 27 initiatives listed by the F2F Draft Action Plan (**BOX 2**). Ultimately, this design **defines the future agricultural policy space** and points out therefore **the next legislative work of the AGRI Committee** related to the F2F Strategy's development.

2.3. Objectives and targets

The list of policy actions of the Draft Action Plan is structured into **1 horizontal objective** and **4 specific objectives** covering all tiers of the food supply chain (food production, food processing and distribution, food consumption) as well as food loss and waste prevention (affecting the whole food chain) (**GRAPH 1**). These objectives are sometimes supported by **targets** indicating what the EC strive to achieve and by when.

As part of each objective, those policy actions listed in the Draft Action Plan define the menu of the F2F Strategy and outline their possible results. This section will get in particular **a glimpse at what main agricultural dishes include this menu**.

The F2F Communication admits that the overall ambition of food sustainable systems will not be successfully achieved by the EU acting alone. As mentioned above (§2.1), one section of the Communication is dedicated to promoting the EU vision at international level. However, the F2F Draft Action Plan does not include any specific policy action at global level.

GRAPH 1. Four specific objectives of the F2F Strategy



Source: European Commission

2.3.1. Horizontal objective: Legislative framework improving sustainable food systems and ensuring food security

Within the F2F Draft Action Plan, this objective involves two policy actions:

- **Action 1.** The European Commission will make a legislative proposal for a **framework for a sustainable food system** before the end of 2023. This will include common definitions, general principles and requirements for sustainable food systems and foods in order to guarantee policy coherence at EU and national level. The framework will also address the responsibilities of all actors in the food system as well as the available tools and incentives to allow operators to overcome the transition. This policy action would likely be chaired by the DG of Health and Food Safety (See **BOX 3**).
- **Action 2.** The COVID-19 pandemic has reiterated the importance of the food security (or capacity to assure the availability of food supply) (see Section 2.2 of F2F Communication). It has also underlined the need to improve the resilience of food operators. Drawing on the lessons learned, the European Commission will develop a **contingency plan for ensuring food supply and food security** to be put in place in times of crisis of any nature (economic, climatic, catastrophic, pests, etc.), to be presented in 2021. In addition to risk assessment and urgent measures to be activated during a crisis, the plan would set a **food crisis response mechanism** coordinated by the Commission and involving Member States. An **EU Food Security Observatory** could be established to monitor and report on the EU's capacity to assure the availability of supplies, covering food production and critical infrastructure, providing transparency and coordination in times of food security crisis. This policy action would be developed by three EC DGs: AGRI, MARE and HEALTH (See **BOX 2**). From an agricultural perspective, this action should revamp the full potential of the **agricultural reserve**.

2.3.2. Food production objective: Ensuring sustainable food production

This objective aims at farming activity. Regulatory and non-regulatory measures are planned in order to stimulate more resource efficient, fairer and inclusive agricultural production. **Ten policy actions** are set out in this area, to be led by DG AGRI (**BOX 2** - five actions: 3, 9, 10, 11 and 12) and DG HEALTH (**BOX 3** - five actions: 4, 5, 6, 7 and 8). These policy actions will represent a serious challenge for the conventional/intensive agriculture, particularly for the livestock sector.

It should be pointed out that this objective includes the sole **quantified targets** of the F2F Communication providing a glimpse into the EC's intentions. Furthermore, **all of these targets directly concern farming practices**:

- Target linked to **Action 3** (measures recommended for the CAP Strategic Plans, reinforced by the Action Plan on organic farming for 2021-2026, a key action of the EU Biodiversity Strategy for 2030): **increasing by 25 % of agricultural land under organic farming by 2030**.
- Target linked to **Action 3** (measures recommended for the CAP Strategic Plans - integrated nutrient management actions plans): **a reduction of nutrient losses by at least 50% while ensuring that there is no deterioration in soil fertility. This will reduce the use of fertilisers by at least 20% at 2030**.

- Target linked to **Action 4** (revision of the Sustainable Use of Pesticides Directive - integrated pest management): a **reduction by 50 % of the overall use and risk of chemical pesticides** and the **use of more hazardous pesticides by 50% by 2030** ⁽³⁾.
- Target partially linked to **Action 8** (revision of the feed additives regulation): a **reduction by 50% of the sales of antimicrobials for farmed animals by 2030**.

The main Commission's initiatives affecting **intensive farming** (under the responsibility of DG HEALTH) (**BOX 3**) are the following:

- **Action 4.** Proposal for a revision of the 2009 [Sustainable Use Directive \(SUD\)](#) to **significantly reduce both 'the risk' and in particular 'the use' and 'dependency' on synthetic chemical pesticides**. This is very specific language. For fertilisers' target (**Action 3**) only '*the use*' is named precisely and for antibiotics' target (**Action 8**) just '*sales reduction*' is mentioned. In order to achieve the pesticides reduction target, the Commission will make a new legislative proposal to enhance the implementation of **Integrated Pest Management (IPM)**. Meanwhile, there is so much we do not know about pesticide use in the EU, according to a recent report from the [European Court of Auditors](#). The Auditors' report noted that there were big gaps in record-keeping of exactly what was being used where, and how much was being used ⁽⁴⁾. These data gaps justify **Action 6**;
- **Action 5.** Revision of the relevant implementing Regulations under the Plant Protection Products framework to facilitate placing on the market of **plant protection products containing biological active substances**. Climate change brings new threats to plant health. The Commission will consequently adopt new measures to protect plants better from emerging pests and diseases, to reinforce vigilance on plant imports and to develop new innovative techniques increasing sustainability and reducing dependency on pesticides.
- **Action 6.** Proposal for a revision of the **pesticides statistics Regulation** to overcome data gaps and reinforce evidence-based policy making;

Furthermore, **livestock farming** is one of the most concerned sector by the F2F Strategy provisions from different angles (environmental, public health, and/or animal welfare). The Communication highlights the **environmental and climate impacts** of current levels of consumption and production of meat, dairy and eggs, the need to shift from an animal-based to a **plant-based diet** in order to reduce risk of life-threatening diseases such as cancer, the evidence that the excessive use of **antibiotics** for farmed animals increase the antimicrobial resistance, and, last but not least, the respect of **animal welfare**.

The main F2F Draft Action Plan's initiatives affecting **livestock farming** are the following:

- **Action 7.** (led by DG HEALTH) (**BOX 3**). Evaluation and revision of the EU legislation on **animal welfare**, including on animal transport and slaughter of animals. The European Commission's [2020 Work programme](#) already confirmed that the current animal welfare strategy will be reviewed this year. The F2F final version simplifies the policy action deleting previous mentions

³ Just a reminder, environmental NGOs propose binding targets to reduce the quantity of synthetic pesticides by 50% by 2025 & by 80% by 2030 (phased out altogether by 2035).

⁴ Additionally, the Auditors recommended that the Commission should include Integrated Pest Management (IPM) practices as a condition for receiving payments from the CAP.

to 'two additional EU reference centres' and 'developing new animal welfare indicators'. The current version of the Draft Action Plan only says that the European Commission will 'evaluate and revise of the existing animal welfare legislation' and postpone the review for three years (until Q4 2023). In addition, the Communication announces that the Commission will consider options for **animal welfare labelling**, justifying it as a way to enhance opportunities for farmers, as consumers increasingly demand more information about the conditions in which the animals whose meat they eat have been raised and slaughtered (⁵).

- **Action 8** (involving DG HEALTH and ENVI). Proposal for a revision of the **feed additives** Regulation to reduce environmental impact of livestock farming (in particular methane and nitrous oxide emissions). In order to improve the sustainability of livestock farms, the European Commission will facilitate the placing on the market of **innovative feed additives** that help reduce the carbon footprint, pollution as well as methane emission. This goal implies the intention to develop **alternative sources of protein** by authorizing novel feed materials such as **insects, algae and by-products from the bio-economy** (e.g. fish waste). The European Commission also points out antimicrobial resistance (AMR) as a serious public health threat linked to the excessive and inappropriate **use of antibiotics** in human and animal health. As mentioned above, the F2F Strategy set out a specific target of decreasing the sales of antimicrobials for farmed animals between 2017 and 2030. However, the Draft Action Plan forgets to mention new regulations on veterinary medicinal products and medicated feed to help achieve this target. Thus, it seems that the entire burden of this action is on the revision of the Feed Additives Regulation.

Finally, this objective involves **five specific agricultural actions** (led consequently by DG AGRI) (**BOX 2**):

- **Action 3**. Adopt recommendations for each MS addressing the nine specific objectives of the CAP, before the **Draft CAP Strategic Plans** are formally submitted. The Communication states in several places the need to implement F2F specific actions within the future CAP Strategic Plans. As examples: the increasing use of agricultural land for **organic farming**; the development of **renewable energies** (biogas, solar) in farms and agricultural cooperatives; reducing the use of pesticides by the implementation of **Integrated Pest Management (IPM)**; developing the **Farm Sustainability Tool for nutrient management** in order to address nutrient pollution at source; improving **advisory services** to enabling farmers to become sustainable; promoting the **EU carbon farming initiative**; assessing any proposal for **coupled support** in CAP National Strategic Plans from the perspective of the need for overall sustainability; etc. Based on the F2F criteria/EC recommendations, each Member State will identify the necessary measures in their National Strategic Plans. A more detailed analysis of the links between the CAP Strategic Plans and the F2F Strategy is developed in Section **§3.2**;
- **Action 9**. Proposal for a revision of the Farm Accountancy Data Network Regulation to convert it into a **Farm Sustainability Data Network** with a view to also collect data on the Farm to Fork and Biodiversity Strategies' targets and other sustainability indicators;

⁵ At the Agrifish Council on 27 January 2020, the German delegation called for the creation of a transparent and harmonised EU-wide animal welfare label, arguing that this will "significantly increase consumer confidence in the labelling of animal products". This proposal was supported by several other delegations, including Spain, Denmark and Italy.

- **Action 10** (shared by DG AGRI and DG COMP). The Commission envisages clarifying the **scope of competition rules** in the TFEU for collective initiatives that promote sustainability in food supply chain. The 2016 Milk package (at the Council's initiative) and the 2017 Omnibus Regulation (at the EP's initiative) already enhanced the collective negotiation powers of farmers. However, the Treaty's '*competition derogation*' for agricultural products is not fully deployed. The DG Competition (DG COMP) remains reluctant to extent the agricultural derogation;
- **Action 11**. Legislative initiatives to strengthen **farmers' position in the supply chain** and to capture a fair share of the added value of sustainable production by **enhancing the cooperation** within the CMO Regulation. Non-legislative initiatives can also be launched to improve transparency. In this context, the F2F provisions may provide the chance to rebalance bargaining power in the agri-food supply chain by publishing Guidelines and/or Commission secondary acts. DG AGRI and DG COMP will work together in order to achieve this objective;
- **Action 12**. An **EU carbon farming initiative** under the Climate Pact will promote new green business ⁽⁶⁾. This initiative should include an '**EU Carbon Farming manual**' to quantify farmers' emission reductions and carbon removals in farms and forestry systems. The Commission's proposals for the post 2020 CAP stipulated that at least 40% of the overall agricultural funds would contribute to climate action. New farming practices are needed to reach the EU's 2030/2050 climate targets ⁽⁷⁾.

As a postscript, it should be highlighted that previous (and leaked) versions of the F2F Strategy included some specific actions that have disappeared from the final list of the F2F Draft Action Plan. This is the case for example of the '**reduction pressure on water resources through the Clean Water Action Plan**' and '**the strategy to reduce the over-fertilisation of soils**' and to prevent water pollution ⁽⁸⁾.

It is also the case of the **new gene-editing techniques** for plants. To jog your memory, on 25 July 2018 the Court of Justice ([Case C-528/16](#)) ruled that products of so-called, "new breeding techniques using CRISPR-CAS 9" should fall under the authorisation of the existing GMO legislation. On this basis, previous versions of the F2F Draft Action Plan had announced as a specific action the '*assessment of the status of new-fangled gene editing techniques*' but this proposal has been kicked into the long grass since 2018. Now, the final version of the F2F Communication simply mentions that '*in response to the request of Member States, the Commission is carrying out a study which will look at the potential of new genomic techniques to improve sustainability along the food supply chain*', due to be finished in April 2021. The cautious terms used by the F2F Communication on these controversial genomic techniques should be noted: '*New innovative techniques, including biotechnology and the development of bio-based products, may play a role in increasing sustainability, provided they are safe for consumers and the environment while bringing benefits for society as a whole*'.

Furthermore, the '*support conversion and maintenance of organic farming in the EU and develop a new Action Plan on organics (2021 - 2026)*' has been deleted from the final version of the F2F Draft Action

⁶ N.B. How to best support carbon capture through the post-2020 CAP was the main topic of discussion of an informal meeting with Agriculture Ministers hosted by the [Finnish Council Presidency in September 2019](#). Grasslands, crop rotation, reduced tillage, direct sowing, afforestation and agro-forestry were highlighted by the Ministers as concrete actions to be developed by the CAP National Strategic Plans.

⁷ On 30 March, The European Commission launched an [online public consultation on the 2030 Climate Target Plan](#). It will be live until 23 June. In addition, the EC will put forward an impact assessment to increase the target from a 40 percent emission-reduction to at least 50 percent and towards 55 percent, compared with 1990 emission levels.

⁸ Water management is one of the vaguest parts of the entire Draft Action Plan in spite of the quantified target set by the Commission to reduce the use of fertilisers by at least 20% by 2030 (see above) and to point out the need to reduce the excess of nutrients (especially nitrogen and phosphorus) through the CAP National Strategic Plans (Action 3).

Plan even though the **Action Plan on organic farming** is mentioned in the text of the Communication and a specific target is confirmed (*‘to reach the objective of at least 25% of the EU’s agricultural land under organic farming by 2030’*) (see above). In fact, the organics’ reference has disappeared because the Action Plan on organic farming for 2021-2026 has become a key action of the EU Biodiversity Strategy for 2030 ([COM \(2020\) 380](#) - Annex).

Finally, the Communication highlights the importance of **seed security and diversity**. However, no specific actions with timetable are listed in the F2F Draft Action Plan.

2.3.3. Food processing and distribution objective: Stimulating sustainable food processing, wholesale, retail, hospitality, and food services practices

This objective aims at food processors, food services operators and retailers. They play a pivotal role between production and consumption in shaping the market through the types of food produced, their nutritional contribution, packaging, merchandising and marketing practices.

The F2F Draft Action Plan lists **seven specific policy actions** in this area to be managed by DG AGRI (1) (**BOX 2**), DG HEALTH (4) (**BOX 3**) and DG GROW (2) (**BOX 4**):

- **Action 13** (led by DG GROW) (**BOX 4**). Initiative to improve the **corporate governance network**, including a requirement for the food industry to integrate sustainability into corporate strategies. Thus, the Commission will seek commitments from food companies to take concrete actions on health and sustainability;
- **Action 14** (led by DG GROW) (**BOX 4**). An EU Code and monitoring framework for **responsible business and marketing conduct** in the food supply chain;
- **Action 15** (led by DG HEALTH) (**BOX 3**). Initiatives to stimulate **reformulation of processed food**, including the setting of **maximum levels for certain nutrients**;
- **Action 16** (led by DG HEALTH) (**BOX 3**). Initiatives to facilitate the shift to healthier diets setting **nutrient profiles** to restrict promotion of food high in salt, sugars and/or fat;
- **Action 17** (led by DG HEALTH) (**BOX 3**). Proposal for a revision of **EU legislation on Food Contact Materials** in order to improve food safety and public health, support the use of sustainable packaging and contribute to food waste reduction;
- **Action 18** (led by **DG AGRI**) (**BOX 2**). Proposal for a revision of EU **marketing standards** to provide for the uptake and supply of sustainable agricultural products and to reinforce the role of sustainability criteria taking into account the impacts on food loss and waste;
- **Action 19** (led by DG HEALTH) (**BOX 3**). The Commission will scale up its combat against **Food Fraud** along the agri-food chain. The European Commission will implement an Action Plan on food fraud to achieve a level playing field for operators and strengthen the powers of control, including by considering a reinforced use of OLAF’s investigative capacities.

The text of the Communication also mentions proposals to strengthen the legislative framework on **geographical indications** and **to promote shorter supply chains**, but the Draft Action Plan does not take on board these initiatives (to be managed by DG AGRI).

BOX 4

**THE FARM TO FORK DRAFT ACTION PLAN (ANNEX OF F2F COMMUNICATION) - III
ACTIONS RELATED TO THE F2F OBJECTIVES LED BY DG GROW**

- **FOOD PROCESSING AND DISTRIBUTION OBJECTIVE: Stimulate sustainable food processing, wholesale, retail, hospitality and food services’ practices**

***Action 13.** Initiative to improve the corporate governance framework, including a requirement for the food industry to integrate sustainability into corporate strategies (Timetable: Q1 2021)*

***Action 14.** Develop an EU Code and monitoring framework for responsible business and marketing conduct in the food supply chain (Timetable: Q2 2021).*

2.3.4. Food consumption objective: Promoting sustainable food consumption, facilitating the shift towards healthy, sustainable diets

This objective aims at consumers and defines **one (trending) target: reversing the rise in gaining weight and obesity rates across the EU by 2030.**

The European Commission points out that EU citizens’ diets are not in line with sustainable and health recommendations and retailers do not always make the sustainable and healthy option the easiest one for consumers. Additionally, the F2F stresses that low-quality diets contribute to the rising incidence of non-communicable diseases, including some cancers.

The F2F Draft Action Plan includes **four policy actions** (to be led by DG HEALTH - **BOX 3**) oriented to build a ‘**Food information policy**’ in order to empower consumers to make sustainable food choices:

- **Action 23.** Over the mid-term (2024), the F2F strategy aims to develop a **sustainable food labelling framework** with ‘a single sustainable food logo’ that would integrate the nutritional, environmental, climate and social dimensions of foodstuffs. As stepping stones to reach this goal, the Commission plans:
 - To harmonise **mandatory front-of-pack nutrition labelling** to enable consumers to make health conscious food choices (**Action 20**).
 - To require **origin indication** for certain food products (i.e. for milk as well as milk and meat used as ingredients) (**Action 21**).
 - To determine the best modalities for setting **minimum mandatory criteria for sustainable food procurement** to promote healthy and sustainable diets, including organic products, in schools and public institutions (**Action 22**).

The F2F Draft Action Plan also suggests reviewing **two specific CAP programmes** with a view to enhancing sustainable production and consumption (**BOX 2**):

- The **EU promotion programme for agricultural and food products (Action 24)**, led by DG AGRI). The F2F Communication explicitly avoids mentioning that current food consumption

patterns are unsustainable from both health and environmental points of view. It calls in particular for reduced meat consumption in order to decrease non-CO2 greenhouse gas (GHG) emissions (methane and nitrous oxide) and to align human intakes to healthy recommendations. In relation to meat, the F2F Communication stresses that the review of the EU promotion programme should focus on how the EU can use its tool to support the most sustainable, carbon-efficient methods of livestock production. Thus, it gives the impression that future consumption promotions will be primarily focused on seasonal fruit and vegetables, whole grain, or fish;

- The **EU school programme** to strengthen educational messages on the importance of healthy nutrition, sustainable food production and reducing food waste (**Action 25**, led by DG AGRI).

2.3.5. Food loss and waste prevention objective: Reducing food loss and waste

Among the 5 overarching objectives of the F2F Strategy (see above **§2.1**), the European Commission includes the integration of food loss and waste prevention in relevant EU's policies. This a real challenge: according to the latest data, about 20% of food produced is currently wasted.

The new Circular Action Plan ([COM \(2020\) 98](#), presented in March 2020) already integrated specific measures against food loss and waste. In fact, this is one of the few areas where the European Commission commits to set concrete, legally-binding reduction targets for the whole EU and particular countries by 2023.

On this basis, the fifth and last F2F objective involves **two policy actions** to be managed by DG HEALTH (**BOX 3**):

- **Action 26.** Proposal for **EU-level targets for food waste reduction**. Following the introduction of an EU-wide methodology to measure food waste and based on data expected from national capitals in 2022, the European Commission will set a baseline and will propose legally **binding targets to reduce food waste**. The recommendations developed by the '[EU Platform on Food Losses and Food Waste](#)' in December 2019 will help show the way forward for all participants of the food supply chain.
- **Action 27.** Proposal for a revision of **EU rules on date marking** ('use by' and 'best before'). The Commission will explore new ways of informing consumers about expiry dates, as the confusion over the current system makes up for a significant portion of food loss in Europe. More specifically, the possible impact of marketing standards such as the 'use by' and 'best before' dates will be analysed.

3. CAP REFORM VS. EUROPEAN GREEN DEAL AND FARM TO FORK STRATEGY

3.1. A unique CAP reform

The context of the CAP reform post 2020 has changed significantly since the publication of the EC proposals in the spring of 2018 to this day. Consequently, the last phase of the on-going CAP reform falls within a **specific background** in socio-economic, environmental and institutional terms (including, among other factors, Brexit, significant budgetary cuts as proposed in the MFF 2021-2027, a new European Parliament and a new European Commission, the acceleration of global warming with extreme temperatures and serious natural disasters over the course of the last two years, intense

agrarian mobilisations in various Member States at the beginning of 2020 ⁽⁹⁾ and, last but not least, the outbreak of the COVID-19 pandemic).

In addition to this particular background, this CAP reform process is characterised by two **formal features** related to: 1) the specific **approach** of Commission's proposals (including the **schedule** for adopting the new CAP regulations, between two parliamentary terms); and 2) the **overlap** between the CAP reform process and the development of the European Green Deal and the Farm to Fork Strategy, consolidating a **new decision-making level**.

- The **EC step by step approach**

Former AGRI Commissioner Hogan heralded a '**phased CAP reform approach**' such as never had been seen before, distinguished by a long string of mini-reforms. This **CAP reform process in stages** started with the [milk package of November 2016](#), with the aim of reducing supply and helping Europe's dairy farmers cope with the price crash that followed the abolition of quotas. The process of partial reforms continued with the [Omnibus Regulation N° 2017/2393](#), with a view to adapting the CAP mechanisms, and with the adoption of the [Directive \(EU\) 2019/633 on unfair trading practices in the food chain](#). The last stage started with the presentation of the MFF (CAP funding) for the period 2021-2027 and the CAP reform package. It should normally be completed during the second semester of 2020. It is yet another partial reform basically devoted to the **CAP governance** issues through the implementation of the named '**new delivery model**' and their **National Strategic Plans**. However, this CAP reform in stages could continue after 2021. The Communication on the European Green Deal announced the presentation of a **long-term vision of rural areas** ([COM \(2019\) 640](#), page 23) (See **BOX 1**) as the new AGRI Commissioner Wojciechowski pledged at the [EP hearings of 1 and 8 October 2019](#). This strategic vision would take the form of a Communication likely to be presented in autumn 2020. But we cannot rule out that this Communication and its Action Plan should be postponed and/or accompanied by legislative proposals. In this scenario we would be facing a **CAP mid-term review**, a new mini-reform likely focused on **improving the implementation of the new delivery model** and **integrating the agricultural matters of the European Green Deal and the F2F Strategy** within the CAP.

- A new **decision-making level on the CAP reform** process

The second particularity of this CAP reform is that the European Green Deal and the Farm to Fork Strategy are going to add a **new decision-making level**. Thus, both initiatives establish a new framework for the CAP post 2020 promoting an integrated approach and strengthening the linkages between the CAP and other common policies with regulatory competences on the agri-food chain. As a result, the European Green Deal and the Farm to Fork Strategy consolidate a **multilevel Common Agricultural Policy** after 2020.

Furthermore, the main difference with previous horizontal legislative packages affecting the CAP is that the European Green Deal and the F2F Strategy become **permanent frameworks** and **threaten the decision-making powers of the AGRI Commissioner**. The past legislative packages adapting agricultural regulations to the WTO or to the Lisbon Treaty, or even the Omnibus package of 2017, were always temporary frameworks in which DG AGRI held its regulatory autonomy and leadership. In contrast to these examples of horizontal packages, the European Green Deal and the F2F Strategy will **continue for a long time**, will be **regularly updated** and a large part of their **implementation will be**

⁹ As the F2F Communication recalls (Section 1), the issue of farmers' incomes remains: the average EU farmer currently earns around half of the average worker in the economy as a whole (See: [CAP context indicators C.26 on Agricultural entrepreneurial income](#), Table 1).

led by other EC Directorates-General (in particular, ENVI and CLIMA for the whole European Green Deal, and HEALTH for the F2F Strategy).

As mentioned (see §1.1), the EP resolution of 15 January 2020 on the European Green Deal Communication ([PA TA\(2020\)0005](#)) reflected MEPs' doubts on the links between the CAP reform and the European Green Deal processes and included a specific request to the Commission to analyse the contribution of the new CAP proposal to the EU's environmental, climate, healthy, and biodiversity protection commitments in order to fully align it to the goals set in the European Green Deal (Point 58 of the resolution).

Replying to this parliamentary request, on 20 May, the Commission published, on the same day as the F2F Strategy presentation, a Staff Working document analysing the links between the CAP Reform and the European Green Deal (including its associated strategies such as the Farm to Fork Strategy) ([SWD\(2020\) 93](#)). This section will summarise this document complementing the descriptive analysis of **Action 3** of the F2F Draft Action Plan (see above **§2.3.2**).

3.2. The relationship between the Farm to Fork Strategy and the CAP Strategic Plan

The F2F policy actions integrate additional **constraints** into the day-to-day farming work (i.e. reducing the use of chemical [pesticides](#), fertilisers and antibiotics; increasing animal welfare requirements; regulating food waste). A few F2F policy actions involve the development of **incentives** for producers (i.e. new support to organic farming) or seek to **improve the farming situation** (i.e. new competition rules enhancing farmers' bargaining power).

Certainly, these two components (new constraints and new incentives) show **how far from the F2F approach the current CAP is**. It is therefore paradoxical that all these new agricultural measures should be **integrated by the new CAP post 2020** with the intention of its being successful.

On this basis, the European Commission must use the F2F policy actions **to refresh the CAP tools** as well as **to strengthen the agricultural contribution to achieve a fair, healthy and environmentally-friendly EU agri-food chain**.

The proposed CAP Strategic Plan Regulation ([COM \(2018\) 392](#)) requires the Commission to consider the **coherence of the draft National Strategic Plans with the common provisions** on conditionality requirements (Annex III of the proposal), types of intervention, environmental and climatic legislation (Annex XI of proposal) ⁽¹⁰⁾, and new societal demands and quantified targets set in strategies associated to the European Green deal (Article 6.1 of proposal) ⁽¹¹⁾. As a result, the new CAP delivery model and their National Strategic Plans theoretically offer Member States the possibility of developing tailor-made and more result-oriented agricultural interventions in order to achieve the Green Deal/F2F political priorities. In other words, a given CAP Strategic Plan will have to contribute simultaneously to achieving national targets and EU/F2F objectives.

However, the F2F Strategy will be getting underway just as reform of the CAP is being brought towards a conclusion. Therefore, the decisions developing the F2F Draft Action Plan will be deployed in the course of the coming years. This implies the **overlapping of the F2F implementation** with the **definition of the scope of the future CAP Strategic Plans**.

¹⁰ However, it is noteworthy that legislation on animal welfare and antimicrobial resistance is not part of Annex XI of the proposal.

¹¹ Article 6.1 of draft Regulation (COM (2018) 392) requests that Member States in their CAP Strategic Plans, to 'improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare'.

In this respect, the EC Staff Working document of 20 May ([SWD\(2020\) 93](#)) concludes that the CAP reform does indeed have the potential to drive forward the Green Deal and associated Strategies, but certain **improvements in the final CAP legislation and the practical initiatives to make the implementation of the future CAP more efficient**, should be developed. As it is described in **Action 3** of the Draft Action Plan (see above **§2.3.2**), this approach confirms the *'instrumental'* role of CAP Strategic Plans to deliver on Europe's objective to become the first climate-neutral continent in the world by 2050 and to build a fair, healthy and environmentally-friendly EU agri-food chain.

The EC staff assessment on the possible gaps jeopardising the objectives of the European Green Deal in the agricultural sector suggests **two improvements in the final CAP legislation**:

- Minimum ring-fenced spending for **eco-schemes** and additional indications concerning agricultural practices that could be supported by eco-schemes.
- Integration of relevant elements of legislation on **animal welfare** and **antimicrobial resistance** in the CAP Strategic Plan Regulation (Annex XI).

Additionally, the Commission could consider taking **practical initiatives to make implementation of the future CAP more efficient**:

- Creating a structured dialogue for the preparation of CAP Strategic Plans, including by providing **recommendations to each Member State** in respect of the CAP specific objectives, **before the Draft CAP Strategic Plans are formally submitted**. This text repeats the definition of **Action 3** of the F2F Draft Action Plan. Under this dialogue, Member States would be asked to address the new quantified F2F targets (see above **§2.3.2**). It ought to be observed that the **European Parliament is completely excluded** from this structured dialogue.
- Publicly sharing additional documents (guidelines) on how **National Strategic Plans** will be assessed as well as sharing observations regarding the assessment of the targets proposed under the different CAP Strategic Plans (allowing consequently their comparison).
- **Assessing coupled income support and interventions under sectorial programmes** proposed in National Strategic Plans in light of its consistency with the need for overall sustainability; and
- Proposing legislation to **enlarge the scope of the current Farm Accountancy Data Network** in order to include sustainability indicators and strengthen its links with advisory services. This proposal is in line with the text of **Action 9** of the F2F Draft Action Plan (see above **§2.3.2**).

The aim of this In-Depth Analysis prepared by the Policy Department for Structural and Cohesion Policies is to explore the possible implications of the Farm to Fork Strategy (F2F) for agriculture and the CAP and, as a result, on the legislative works of the AGRI Committee over the 2020 - 2023 period.

The analysis is based on the following sources: the Communication on the European Green Deal (COM (2019) 640 of 11 December 2019); the EC roadmap and key actions of the European Green Deal (11 December 2019); the EC F2F Strategy roadmap (17 February 2020); the Communication 'A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system' (COM (2020) 381 of 20 May 2020); the Draft Action Plan of the Farm to Fork Strategy (Annex of the EC Communication of 20 May 2020); the Commission staff working document 'Analysis of links between CAP reform and Green Deal' (SWD (2020) of 20 May 2020); and others background documents accompanying the F2F Communication of 20 May 2020.

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