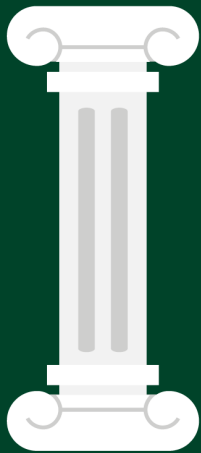




## Three Pillars for a Sustainable European Food System

- Core demands for the next European Parliament and Commission -





## Introduction

2019 will bring the European Union under new political management. The 9th European Parliament, along with a newly appointed College of Commissioners, will have to revise and define policy objectives for the European food system. These decisions will be crucial for re-shaping Europe's food production, food chain, food consumption and agriculture over the coming decades. 2019 will be a make-or-break year regarding the shift towards a sustainable European food system.

While change is deeply needed, the reasons are manifold:

- **Animal welfare:** The current levels of production and consumption of animal products, as well as the sheer scale of approximately 9 billion animals that were raised for food in 2017 in the EU alone<sup>1</sup>, can only be sustained with intensive industrialised farming systems, which have severe implications for animal welfare. European citizens are increasingly opposed to this – according to a Eurobarometer report, 94% of Europeans think that it is important to protect the welfare of farm animals, while 82% believe that they should be better protected than they currently are.<sup>2</sup>
- **Environment and Climate:** The majority of food-related emissions are caused by the livestock sector, which emits 8.1 gigatons of CO<sub>2</sub> equivalents yearly and accounts for around 16% of global anthropogenic greenhouse gas emissions.<sup>3</sup> The sector's share of the emissions allowable under the 1.5°C global warming goal could even increase by up to 49% by 2030 if current trends continue.<sup>4</sup>
- **Health:** The latest report of the EAT-Lancet Commission on a sustainable food system that is healthy for both humans and the planet, states that globally the consumption of healthy foods such as fruits, vegetables, legumes, and nuts will have to at least double, while the intake of red meat and sugar has to be halved by 2050. This is mainly due to the current excessive consumption of these foods in wealthier countries.<sup>5</sup> The report found that a “diet rich in plant-based foods and with fewer animal source foods confers both improved health and environmental benefits”, concluding that a “radical transformation of the global food system is urgently needed.”<sup>6</sup>

<sup>1</sup> FAO (Food and Agriculture Organization of the United Nations) (2017): FAOSTAT Statistics Database. Available at <http://www.fao.org/faostat/en/#data/QL> [24.04.2019]

<sup>2</sup> TNS opinion & social (2016): Special Eurobarometer 422. Report. Attitudes of Europeans towards Animal Welfare. Survey requested by the European Commission Directorate-General for Health and Food Safety and coordinated by the Directorate-General for Communication, p. 4. Available at <http://eurogroub.cluster020.hosting.ovh.net/wp-content/uploads/Eurobarometer-2016-Animal-Welfare.pdf> [29.04.2019]

<sup>3</sup> FAO (Food and Agriculture Organization of the United Nations) (2018): Global Livestock Environmental Assessment Model (GLEAM). GLEAM 2.0 - Assessment of greenhouse gas emissions and mitigation potential. Available at <http://www.fao.org/gleam/results/en/> [15.04.2019]; IPCC (2014): Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, Geneva, Switzerland, p. 46.

<sup>4</sup> Harwatt, H. (2018): Including animal to plant protein shifts in climate change mitigation policy: a proposed three-step strategy. *Climate Policy*, 0, p. 3.

<sup>5</sup> Willett, W., J. Rockström, B. Loken, et al. (2019): Food in the Anthropocene: the EAT-Lancet Commission on healthy diets from sustainable food systems.

<sup>6</sup> EAT (2019): Summary Report of the EAT-Lancet Commission on Healthy Diets From Sustainable Food Systems, p. 3, 5. Available at [https://eatforum.org/content/uploads/2019/01/EAT-Lancet\\_Commission\\_Summary\\_Report.pdf](https://eatforum.org/content/uploads/2019/01/EAT-Lancet_Commission_Summary_Report.pdf) [29.04.2019]

- **Resources:** Around a third of the world's grain and two-thirds of soya, maize, and barley are used as feed crops for livestock.<sup>7</sup> At the same time, the conversion from plant to animal protein is highly inefficient: the majority of the calories from crops fed to animals are used for their metabolism and other physical mechanisms and are, therefore, not available for humans in the form of meat or milk. This amounts to an estimated food loss of 234 kg of human edible cereals per person each year.<sup>8</sup> Furthermore, the water footprint of animal products is much bigger than that of plant products. People from industrialised countries eating a mixed diet that includes meat and other animal-based products have a water footprint of around 3.600 litres per day, in comparison to a 1.700 litre water footprint for people following a vegan diet.<sup>9</sup>

**The European Vegetarian Union (EVU) calls for a paradigm shift in food and agriculture policy, aimed at reducing livestock production and the consumption of animal-based products while, at the same time, boosting the production of plant-based products for human consumption. For this purpose, concrete targets, impactful measures, and clear timelines must be defined by EU policymakers. These must culminate in an EU-wide reduction strategy for animal products.**



Safeguarding natural resources and public goods should take priority over economic interests. Pressure must be removed from the system by reducing the mass production of animal-based products, combined with a shift away from the current focus of increasing exports.<sup>10</sup>

A discussion about the future direction of the food and agriculture sector is justified by the massive amount of subsidies it receives, which constitutes about a third of the EU's budget<sup>11</sup>. Billions are spent within the frame of the Common Agricultural Policy (CAP) without sufficient steering. As a result, subsidies are almost exclusively tied to land ownership rather than rewarding the protection of public goods.<sup>12</sup>

<sup>7</sup> Willett, W., J. Rockström, B. Loken et al. (2019): Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems, p.26.

<sup>8</sup> CIWF (Compassion in World Farming) (2014): A Sustainable Food Policy for Europe: Towards a sustainable, nourishing and humane food policy for Europe and globally, p. 1. Available at <https://www.ciwf.org.uk/media/5858105/a-sustainable-food-policy-for-europe-executive-summary.pdf>

<sup>9</sup> Hoekstra, A. Y. (2012): The hidden water resource use behind meat and dairy. Animal Frontiers, 2, p. 7. Available at [https://waterfootprint.org/media/downloads/Hoekstra-2012-Water-Meat-Dairy\\_2.pdf](https://waterfootprint.org/media/downloads/Hoekstra-2012-Water-Meat-Dairy_2.pdf) [29.04.2019]

<sup>10</sup> EU Commission (2019): Short-term outlook for EU agricultural markets in 2018 and 2019. Available at [https://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/short-term-outlook-spring-2019\\_en.pdf](https://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/short-term-outlook-spring-2019_en.pdf) [07.05.2019]

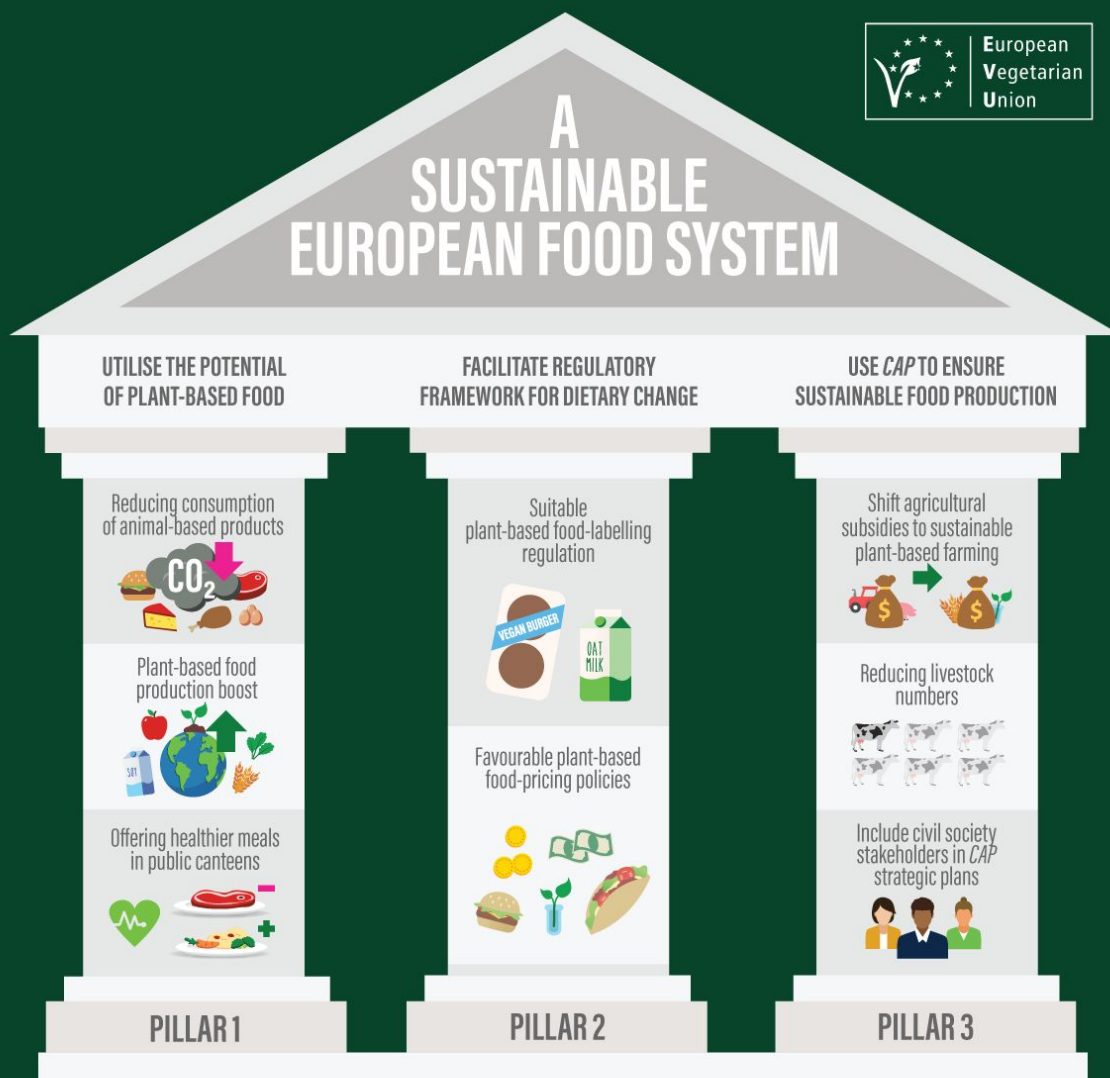
<sup>11</sup> EU Commission (2018): EU Budget: The CAP After 2020. Available at [https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-modernising-cap\\_en.pdf](https://ec.europa.eu/commission/sites/beta-political/files/budget-may2018-modernising-cap_en.pdf) [15.04.2019]

<sup>12</sup> Wissenschaftlicher Beirat für Agrarpolitik, Ernährung und gesundheitlichen Verbraucherschutz beim BMEL (2018): Für eine gemeinwohlorientierte Gemeinsame Agrarpolitik der EU nach 2020: Grundsatzfragen und Empfehlungen. Stellungnahme, S. I. Available at [https://www.bmel.de/SharedDocs/Downloads/Ministerium/Beiraete/Agrarpolitik/GAP-GrundsatzfragenEmpfehlungen.pdf?\\_\\_blob=publicationFile](https://www.bmel.de/SharedDocs/Downloads/Ministerium/Beiraete/Agrarpolitik/GAP-GrundsatzfragenEmpfehlungen.pdf?__blob=publicationFile) [07.05.2019]

Taking all this into account, radical change is warranted. EVU suggests

### 3 Pillars for a Sustainable European Food System:

1. Utilise the potential of plant-based foods.
2. Facilitate a regulatory framework for dietary change.
3. Use CAP to ensure sustainable food production and consumption, as well as environmental and animal protection.





## Pillar 1: Utilise the potentials of plant-based food

Plant-based foods provide the potential for crucial contributions to several policy fields. The solutions they offer should be recognised and acted upon. Important example areas of action include:

### Climate change

Livestock and aquaculture products provide only 37% of protein and 18% of calories to humans' diets, but contribute 56-58% of food-related emissions.<sup>13</sup>

In the EU, livestock farming is responsible for an estimated 12-17% of the EU's greenhouse gas emissions, and is predicted to increase over the next decades.<sup>14</sup> As meeting the goals set by the Paris Agreement would be unattainable if this is not counteracted, ambitious climate protection goals for the agricultural sector need to be established. Livestock-reduction

targets must be included in the EU's long-term climate strategy and national contributions of Member States. Additionally, climate-friendly plant-based food production must be accelerated.

At the same time, animal product consumption has to be targeted in order to avoid shifts towards increased imports from third countries. Unlocking this potential is crucial: in the European Union, halving the consumption of animal products would achieve a 25-40% reduction in greenhouse gas emissions from agriculture.<sup>15</sup>

Plant-based products generally compare favourably when it comes to greenhouse gas emissions. For example, a kilogram of protein from beef generates 45 to 640 kg of CO<sub>2</sub> equivalents, while the same amount of protein from tofu generates only 10 kg of CO<sub>2</sub> equivalents.<sup>16</sup>

### Health and diet-related diseases

Noncommunicable diseases related to the way Europeans eat are on the rise.<sup>17</sup> A great opportunity for adjustment lies in the numerous public canteens and cafeterias throughout Europe, where millions of meals are distributed each day. Obligatory application of dietary guidelines should be a requirement for menu plans as well as climate-related considerations, which would necessarily result in cutting back on meat and offering more plant-based dishes. People should be provided with sufficient information and the option to choose healthier and more climate-friendly meals.

The drafts of the Green Public Procurement guidelines for food procurement and catering services by the European Commission also take the potential of plant-based meals for environment and climate protection into consideration. They provide good advice on making the offerings in public canteens more sustainable by suggesting that plant-based meals be incorporated into everyday menu plans and introducing at least one 'veggie day' per week.<sup>18</sup> The Commission should quickly

<sup>13</sup> Poore, J. & T. Nemecek (2018): Reducing food's environmental impacts through producers and consumers. *Science*. 360, p.990.

<sup>14</sup> Bellarby, J., R. Tirado, A. Leip et al. (2013): Livestock greenhouse gas emissions and mitigation potential in Europe. *Glob Chang Biol*. 2013 Jan. 19(1), p. 9.

<sup>15</sup> Westhoek, H. et al. (2014): Food choices, health and environment: Effects of cutting Europe's meat and dairy intake. *Global Environmental Change* 26, p. 201.

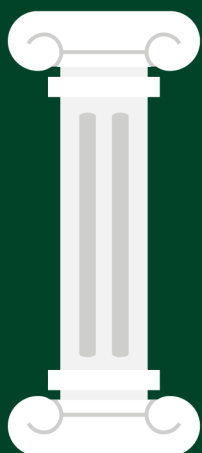
<sup>16</sup> Mejia, A., H. Harwatt, K. Jaceldo-Siegl et al. (2017): Greenhouse Gas Emissions Generated by Tofu Production: A Case Study. *Journal of Hunger & Environmental Nutrition*. p.8.

<sup>17</sup> Willett, W., J. Rockström, B. Loken et al. (2019): Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. Available at [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(18\)31788-4/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(18)31788-4/fulltext) [24.04.2019]

<sup>18</sup> Boyano, A., N. Espinosa, R. Rodriguez et al. (2017): Revision of the EU GPP criteria for Food procurement and Catering Services. European Commission, p. 42. Available at [http://susproc.jrc.ec.europa.eu/Food\\_Catering/docs/EU\\_GPP\\_Food\\_catering\\_criteria\\_TR3.0.pdf](http://susproc.jrc.ec.europa.eu/Food_Catering/docs/EU_GPP_Food_catering_criteria_TR3.0.pdf) [29.04.2019]

adopt these guidelines in order to officially make them accessible for public institutions throughout Europe and incentivise their implementation. Public authorities and political institutions can act as role models by realigning their own canteens, as well as serving healthy, climate-friendly dishes during in-house events.

Moreover, extensive and long-term information and image campaigns surrounding dietary guidelines, health recommendations, the climate impact of diets, and the positive aspects of plant-based foods should be launched in public spaces such as canteens and schools.



## **Pillar 2: Facilitate regulatory framework for dietary change**

As outlined in pillar one, shifting from diets that rely heavily on animal-based products to more plant-based ones has the potential to mitigate negative effects in various problem areas. As a consequence, the regulatory framework for plant consumption and production has to be examined and improved where it is hindering the availability of plant-based products on the one hand and the convenience to choose them on the other. Choosing plant-based foods and meals needs to be the easy option.

### **Food labelling**

Food labelling is a key area of improvement in the regulatory framework for plant-based diets. The most pressing issue here is the legally binding definition of the terms ‘vegan’ and ‘vegetarian’. The European legislator called on the European Commission to issue an implementing act with definitions for these terms in 2011 as part of the Food Information to Consumers Regulation (FIC).<sup>19</sup> Since then, the Commission has remained inactive. Yet, clear and consistent rules on what constitutes a vegan or vegetarian product are necessary in order for consumers to gain reliable information and make informed purchase and consumption decisions. EVU urges the Commission to start working on the implementing acts by 2020, at the latest, so that vegan and vegetarian labelling will be harmonised and universally recognised in the European Union by no later than 2021.

Several stakeholders wish to restrict the usage of sales denominations traditionally used for meat and dairy products to describe vegan and vegetarian alternatives. Legislators should not buy into the myth that terms such as ‘vegan steak’ or ‘vegetarian burger’ mislead consumers, and refrain from introducing any bans on current well-established labelling practices. The current approach, which is widely used, both in Europe and around the world, indicates valuable product information to interested customers and helps them to make informed and independent purchasing decisions. A German representative consumer survey<sup>20</sup> has shown that consumers are not confused by the current labelling and EVU, therefore, calls on decision makers to pave the way for appealing food labelling.

At the same time as the labelling of meat alternatives is being discussed, the situation for dairy alternatives is already very restrictive: the EU’s Common Market Organisation (CMO) prohibits

<sup>19</sup> Art. 36 lit. 3 b) of Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers

<sup>20</sup> forsa on behalf of vzbv (2015): Umfrage zur Kennzeichnung von vegetarischen und veganen Lebensmitteln. Available at [https://www.vzbv.de/sites/default/files/downloads/2017/02/15/meinungen\\_zur\\_kennzeichnung\\_von\\_lebensmitteln\\_080615.pdf](https://www.vzbv.de/sites/default/files/downloads/2017/02/15/meinungen_zur_kennzeichnung_von_lebensmitteln_080615.pdf) [15.04.2019]

plant-based dairy alternatives from bearing sales denominations such as ‘soya milk’ or ‘vegan cheese’. As it evolves, the CMO needs to repeal these anachronistic restrictions on plant-based products. In a first step, the Commission should update Decision 2010/791/EU<sup>21</sup>, which exempts traditional denominations such as coconut milk from the dairy ban, and consult the Member States about useful additions such as ‘soya milk’, aligning regulations with the current perceptions of European customers.

Furthermore, EVU is in favour of comprehensive animal welfare labeling, encompassing all products and methods of rearing livestock.

### Taxation

Tax adjustments are simple and effective means of creating incentives that can influence consumer behaviour. Considering the problematic effects that current levels of consumption and production of animal-based products impose on the environment, climate, health, and animals, reforming taxation policies for these commodities is warranted. Throughout the EU, animal-based products should not be favoured by the Value Added Tax (VAT) system wherever discount rates are applied. This practice acts as a hidden subsidy and cannot be justified, considering the massive negative externalities resulting from the production of animal-based products. In Germany alone, this amounts to an estimated 5.2 Billion Euros.<sup>22</sup> Instead, considerations should be given to the inclusion of externalities in the prices, thus price-signaling the impact of their consumption to consumers. In addition to adjustments in VAT systems, externalities could also be internalised via a range of fiscal measures such as taxes on nitrogen surpluses or the import of feed crops, all of which should be considered.

At the same time, it is important to incentivise the increased consumption of plant-based products. This can be done by reducing taxes for fruits, vegetables, and legumes. Additionally, existing barriers should be eliminated: particularly the disadvantage that plant-based milk alternatives face in comparison to cow’s milk in the VAT systems of many EU countries. Plant-based milk alternatives represent eco-friendly alternatives and should therefore at least be taxed equally.

### EU School fruit, vegetables and milk scheme

The EU school fruit, vegetables and milk scheme<sup>23</sup> is a Europe-wide initiative to educate pupils about health and nutrition and provide them with healthy foods. This educational programme, based on Regulation (EU) 2016/791, needs to be improved regarding the inclusion of certain groups of people and product ranges.

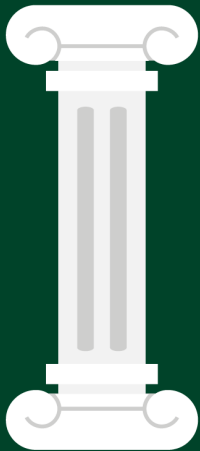
For environmental, health, and animal-welfare related reasons, more and more people are choosing plant-based products over animal-based ones. This applies especially to young people, who are the target of the school fruit, vegetables and milk scheme. The programme needs to acknowledge the various reasons for people to choose plant-based dairy products, and provide adequate alternatives in order for everyone to fully benefit from the programme. Given that the school scheme will subsidise milk and dairy products with 105 million Euros in the school year

<sup>21</sup> Commission Decision (EU) 2010/791 of 20 December 2010 listing the products referred to in the second paragraph of point III(1) of Annex XII to Council Regulation (EC) No 1234/2007 (recast) (notified under document C(2010) 8434) [2010] OJ L336/55. Available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010D0791&from=EN> [29.04.2019]

<sup>22</sup> Köder, L., A. Burger (2016): Umweltschädliche Subventionen in Deutschland. Aktualisierte Ausgabe 2016. Ed.: Umweltbundesamt, p. 67. Available at [https://www.umweltbundesamt.de/sites/default/files/medien/479/publikationen/uba\\_fachbroschuere\\_umweltschaedliche\\_subventionen\\_bf.pdf](https://www.umweltbundesamt.de/sites/default/files/medien/479/publikationen/uba_fachbroschuere_umweltschaedliche_subventionen_bf.pdf) [29.04.2019]

<sup>23</sup> European Commission: School fruit, vegetables and milk scheme. [https://ec.europa.eu/agriculture/school-scheme\\_en](https://ec.europa.eu/agriculture/school-scheme_en) [24.04.2019]

2019/2020 alone<sup>24</sup>, plant-based alternatives should also receive adequate support and subsidisation.



### **Pillar 3: Use CAP to ensure sustainable food production, consumption, environmental and animal protection**

The most important framework for shaping agricultural production in the EU is the Common Agricultural Policy (CAP). Around 70% of the EU's farmland is currently used to feed livestock, with respective CAP direct payments amounting to 28-32 Billion Euros per year.<sup>25</sup> CAP must be used for steering the European food system in the right direction: from 2021 onwards, subsidies must be targeted at aligning agricultural production with sustainability and climate targets such as the Paris Agreement and the Sustainable Development Goals to which the community of states has already committed itself. The European Court of Auditors (ECA) has stated in its opinion on the Commission's proposal for CAP after 2020 that in order to ensure food security in the future, it will be more important to address

climate change than to merely support farm income.<sup>26</sup> CAP must represent a holistic framework that not only focuses on production outcome but which considers the impact it has on climate, environment, and the health of animals and humans. Therefore, public funding needs to be targeted towards protecting public goods. Consequently, subsidies should be tied to sustainable food production, with mandatory measures for improvements in terms of environment, climate, animal welfare, and public health.

EVU urges decision makers to place an emphasis on plant-based foods by shifting more support to plant-based protein for human consumption, and compensating for the inefficient conversion from plant to animal protein. Conversely, measures for the reduction of livestock numbers must be adopted. Such measures could include the coupling of livestock numbers to the farmland available, meaning that only as many animals can be kept as the corresponding farmland can provide for in terms of feed crop production and bear in terms of manure/nitrogen absorption. Reduced livestock numbers open up the possibilities for improvements in animal welfare. As European citizens are increasingly concerned about the conditions in intensive animal husbandry, raising fewer animals can enable improved animal-welfare standards that are more in line with what consumers expect and demand.

Despite more and more calls for a greener CAP, the Commission's proposal for CAP reform does not include impactful measures to increase climate and environmental protection, according to the ECA. Unfortunately, the Commission is planning to drastically cut the funding of CAP's second pillar, a proposal which has been rightfully criticised by many civil society organisations.

<sup>24</sup> EU Commission (2019): €250 million available to support healthy eating habits for European schoolchildren. [http://europa.eu/rapid/press-release\\_IP-19-1848\\_en.htm](http://europa.eu/rapid/press-release_IP-19-1848_en.htm) [06.05.2019]

<sup>25</sup> Greenpeace: Over 71% of EU Farmland dedicated to meat and dairy, new research. Available at <https://www.greenpeace.org/eu-unit/issues/nature-food/1807/71-eu-farmland-meat-dairy/> [29.04.2019]

<sup>26</sup> Publications Office of the European Union (2019): Official Journal of the European Union. Volume 62, 1 February 2019, p. 12. Available at [https://www.eca.europa.eu/Lists/ECADocuments/OP18\\_07/OP18\\_07\\_EN.pdf](https://www.eca.europa.eu/Lists/ECADocuments/OP18_07/OP18_07_EN.pdf) [15.04.2019]



Within the current CAP system, the opportunities offered to the Member States to implement more sustainable and eco-friendly policies have, in many cases, not even been fully exhausted. 15% of CAP's Agricultural Guarantee Fund (EAGF) can potentially be redirected to the European Agricultural Fund for Rural Development (EAFRD),<sup>27</sup> which supports more sustainable and environmentally-friendly farming. Germany, for example, currently only redirects 4.5%.<sup>28</sup> All Member States should make use of this opportunity.

Last but not least, civil-society stakeholders must be consulted during the preparation of the various national strategic plans. These plans are the key instruments used to define the goals, interventions, and finances of the agricultural policies of the Member States. In order to ensure that it is a transparent and democratic process, it is of vital importance to include all stakeholders in their development.

**May 2019**  
**European Vegetarian Union**

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<sup>27</sup> Parliament and Council Regulation (EU) 1307/2013 of 17 December 2013 establishing rules for direct payments to farmers under support schemes within the framework of the common agricultural policy and repealing Council Regulation (EC) No 637/2008 and Council Regulation (EC) No 73/2009 [2013] OJ L347/608. Available at [https://eur-lex.europa.eu/l\\_exUriServ/l\\_exUriServ.do?uri=OJ:L:2013:347:0608:0670:en:PDE](https://eur-lex.europa.eu/l_exUriServ/l_exUriServ.do?uri=OJ:L:2013:347:0608:0670:en:PDE) [29.04.2019]; Parliament and Council Regulation (EU) 1305/2013 of 17 December 2013 on support for rural development by the European Agricultural Fund for Rural Development (EAFRD) and repealing Council Regulation (EC) No 1698/2005 [2013] OJ L347/487. Available at [https://eur-lex.europa.eu/l\\_exUriServ/l\\_exUriServ.do?uri=OJ:L:2013:347:0487:0548:en:PDE](https://eur-lex.europa.eu/l_exUriServ/l_exUriServ.do?uri=OJ:L:2013:347:0487:0548:en:PDE) [29.04.2019]

<sup>28</sup> BMEL (Bundesministerium für Ernährung und Landwirtschaft): Fragen und Antworten zum Hintergrund des geltenden Stands der GAP. Available at [https://www.bmel.de/DE/l\\_andwirtschaft/Agarpolitik/\\_Texte/GAP-FAQs.html](https://www.bmel.de/DE/l_andwirtschaft/Agarpolitik/_Texte/GAP-FAQs.html) [24.04.2019]