

To: Commissioner Kyriakides
Commissioner Wojciechowski
Commissioner Sinkevičius

Brussels, 3rd November 2023

Subject: *The right sequencing and increased dialogue with united agri-food chain is required to develop a robust definition of sustainability and solid and relevant indicators for the F2F monitoring framework – Follow-up request for a meeting*

Dear Commissioners,

The undersigned organisations, members of the DG SANTE Advisory Group on Sustainable Food Systems (AGSFS), have been supporting the development and implementation of the Farm To Fork Strategy (F2F) with constructive input over the past years. We fully agree that monitoring and evaluating progress, based on scientific evidence and clearly identified indicators, is essential to understanding the effectiveness of policy actions. However, **we seriously question the timing and sequencing chosen to establish a F2F monitoring framework as presented on 19 September 2023. We are also concerned by the lack of involvement of the agri-food chain actors in the development of such monitoring framework.**

The overall vision for sustainability related to the agri-food sector has not been truly defined and set at EU level yet. The announced strategic dialogues on the future of agriculture are also expected to contribute to this. The monitoring framework would first require a clear common view of the main goals. If we establish this framework now, we risk finding ourselves with a system that will not match EU legislations and policies linked to F2F, with duplications and incoherences regarding the monitoring objectives and their attached indicators. At this stage, many legal initiatives clarifying goals are still to be launched or adopted (e.g. SUR, revision of the marketing standards, FSFS, revision of animal welfare, etc). The indicators for monitoring the progress towards those objectives are also currently being discussed in those same legislative initiatives.

This system could also be incoherent to other indicators developed out of the F2F by other Directorate-Generals (DGs) within the European Commission, such as the European Sustainability Reporting Standards (developed in the context of the Corporate Sustainability Reporting Directive). Moreover the European Commission recently announced its commitments to reduce additional administrative burden and reporting requirements by 25%. We are strongly calling for full coordination of those initiatives between different DGs, to avoid additional administrative costs and burdens for operators, with ensuing consequences on competitiveness.

The development and adoption of policies and legislation to be monitored should precede the development of the monitoring framework itself. **We thus call on the Commission to review the sequencing of the development of the monitoring framework, starting from common political/societal goals, an assessment of the role of food systems in helping to close priority gaps in sustainable development in Europe, and then targets based on most recent science and clear definitions (including the definition of sustainability).** Only thereafter should a sustainability assessment framework be developed as a tool to measure and ensure progress, taking into account

existing initiatives that have already been proposed or adopted, and progressively adding new elements as additional F2F initiatives are adopted.

Given the potential impact of the monitoring framework, it will be crucial to reinforce stakeholder involvement, as indicated in the letter we sent on 12 May 2023. We encourage the European Commission to organise an in-depth stakeholder approach with workshops describing and defining the food chain more accurately and to develop potential indicators, including the interpretation thereof, more precisely. This exercise has to unfold in a dialogue with all relevant agri-food chain stakeholders to ensure balanced and realistic results.

The signatories of this letter remain open to further engage in the dialogue and would appreciate the opportunity of a meeting with you to discuss the above points.

Thank you for your time and consideration.

Yours sincerely,

On behalf of the following organisations:

Animal Health Europe - representing manufacturers of animal medicines, vaccines and other animal health products in Europe

AREFLH - Assembly of European Horticultural Regions

AVEC - Association of Poultry Processors and Poultry Trade in the EU countries

CEETTAR - European Organisation of Agricultural, Rural and Forestry Contractors

CEEV - Comité Européen des Entreprises Vins

CELCAA - The voice of European traders in agri-food commodities

COCERAL - European association of trade in cereals, oilseeds, rice, pulses, olive oil, oils and fats, animal feed and agrosupply

Copa-Cogeca - the united voice of farmers and their cooperatives in the European Union

EFFA - European Flavour Association

EFFAB - European Forum of Farm Animals Breeders

ELO - European Landowners' Organization

Eurocommerce - the voice of Retail and Wholesale in Europe

FEDIOL - EU vegetable oil and proteinmeal industry

FEFAC - The European Compound Feed Manufacturers' Federation

FEFANA - EU Association of Specialty Feed Ingredients and their Mixtures

FoodDrinkEurope - represents the European food and drink industry, the largest manufacturing sector in the EU in terms of turnover and employment

Freshfel – the European fresh fruit and vegetable chain

GME - Gelatine Manufacturers of Europe

Growing Media Europe - representing the producers of growing media and soil improvers

Hotrec - the umbrella Association of Hotels, Restaurants, Pubs and Cafes and similar establishments in Europe

IBC – International Butchers' Confederation

PFP - Primary Food Processors

Serving Europe - Branded Food and Beverage Service Chains Associations

EU Specialty Food Ingredients - Federation of European Specialty Food Ingredients Industries

UECBV - European Livestock and Meat Trades Union

UEVH - Union of European Veterinary Hygienists - Veterinarians for Public Health



Cc:

Peter Van Kemseke, Member of Commission President Von der Leyen's cabinet
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