

Response to Roadmap “Farm to Fork” Strategy

Key messages

- We welcome the ambition and the comprehensive nature of strategy set out by the Commission in the European Green Deal and the opportunity to comment on the roadmap leading to the Farm to Fork strategy.
- We have already shared our thoughts on the Farm-to-Fork sustainable food strategy in [a letter to Commissioner Kyriakides](#), highlighting the many actions undertaken by our sector in working with the Commission, EU associations and national governments. These have driven change at local, national and global level. We are eager to participate in the roll out of the strategy sharing best practice and seeking opportunities for upscaling and multiplying.
- Food retailers and wholesalers are a central actor in the food supply chain: they are in daily contact with Europe’s 500 million consumers and they operate sophisticated and efficient systems ensuring the reliable and safe distribution of foods. They work to meet consumers’ ever-changing demands and help them lead a healthy and sustainable lifestyle. The 5,4 million companies, large and small, and 29 million people working in the sector, are daily engaged in pursuing these socially valuable objectives.
- It is in retailers’ DNA to offer consumers the best choice of quality, innovation and price. Consumers and businesses are increasingly looking for products which meet their customers’ sustainability expectations. Retailers and wholesalers survive by innovating - reacting quickly to changes in consumer choices and behaviour, such as product-related demands for, among others, fair trade, regional and healthy food products. Changes also include demographic changes, with more single households and an ageing population. This ability to innovate and adapt to new trends and demands is crucial to drive the transformation toward sustainable food systems and voluntary initiatives should be recognised and supported.
- Lastly, as a general comment we would like to bring to the Commission’s attention the digital revolution in the economy which is transforming and disrupting retail and wholesale. It is forcing fundamental changes: new business models and channels are emerging, data is becoming a core part of the business, customers buy differently, new skills are needed, brick and mortar stores in towns have to evolve to stay relevant. SME’s are especially affected and often lack access to the skills and support needed to go online. This digital revolution and disruption should be understood and acknowledged throughout the development and implementation of Farm to Fork Strategy.

Specific comments related to the roadmap

- We urge the Commission to maintain a single **framework** connecting the different initiatives in a coherent manner and setting clear goals, while also keeping a clear link with the Green Deal, especially with the Circular Economy Action Plan, the Single Market Enforcement Action plan and the Biodiversity strategy. In addition, care is needed to ensure the Common Agricultural Policy, the Common Fisheries Policy, the Industrial strategy and the EU Trade policy are properly aligned with the objectives of the Farm to Fork Strategy.

- While we understand that no impact assessment will be done ahead of the publication of the Communication on the Farm to Fork strategy, we strongly advise the Commission to keep a close eye on the impact assessments on individual initiatives, and carefully **assess the cumulative effects**, on the retail and wholesale sector and their economic viability.
- We request the Commission to set up a **dedicated stakeholder platform** for the Farm to Fork Strategy to maintain a proper overview of the discussions that take place in the different stakeholder fora listed in the roadmap.
- We further ask the Commission to **keep food safety and a science-based approach** at the heart of the Farm to Fork strategy. Food safety should never be compromised, and the excellent achievements in this field via the cooperation of all relevant actors in the supply chain need to be secured.
- One of the key factors going forward, namely ensuring the proper functioning of the **single market**, is missing at present. While pursuing the individual initiatives of the Farm to Fork strategy the overarching goal of a frictionless internal market must always be taken into account, without harming (or having a detrimental impact on) the food production(s) of any Member State.
- Equally, a more explicit reference of how the Commission will push this sustainability agenda on **the global stage** should also be included.
- Lastly, we would have liked the roadmap to include **more concrete timelines and milestones**, including on mid-term goals and reviews assessing progress. The targets should be more specific, measurable and timed, and should include a reference to skills and educational programs. In this respect, it would be interesting to get an easy visualization of the timeline of the roadmap.

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Going forward we would already like to share with you the **following key asks**:

Strengthening the single market for sustainable food

Despite a high level of harmonisation in EU rules related to food, there are increasing differences between Member States in implementation and controls, as well as national rules on country of origin, front of pack, food contact material, and more. This fragmentation of the internal market is hampering the free circulation of goods and causes legal uncertainties.

In the light of the Farm to Fork Strategy, we ask the Commission to work with Member States to address this situation and work towards more EU harmonisation.

Consumer information

As a consumer-facing sector, we are committed to our customers who expect to find a wide choice of quality products for the right price. As such, companies continuously adapt their supply chains and product offer in line with evolving demand. Our members have developed multiple initiatives to help consumers make the choice suited to their specific needs and are keen to continue to **develop and share best practice to allow for their further multiplication.**

Driving the market needs a sufficient supply of sustainable food products

Retail and wholesale play a key role in transmitting consumer demand to primary producers and manufacturers. Our sector has, especially through the development of new private label products, been instrumental in the development of the market for sustainable food, such as the organic market, and developing dedicated product ranges and local specialities in store. We believe, therefore, that the strategy needs to start with the consumer and work back.

To support further growth of the market, reliable supplies of quality products with the suitable characteristics are needed. To facilitate this, **the Farm to Fork Strategy needs to avoid additional regulatory burdens for businesses which might reduce the offer of sustainable products to consumers. Instead we ask the Commission to support technology, innovation and research and other enabling actions to help consumer have access to the food product they need.**

Quality standards

Quality standards provide a basis for positive and mutually beneficial relationships between producers, purchasers and NGO's to raise animal welfare and environmental standards. These must be able to go beyond the legal minimum, if the objectives of the Green Deal and the Farm to Fork strategy are to be achieved in a timely manner. Such standards allow for flexibility for supply chain operators and NGO's to drive the sustainability agenda more ambitiously and effectively than regulation. Primary producers should be supported to change the way they produce food to be more environmentally and socially sustainable.

We ask the Commission to recognise and support the role of such third-party and private quality standards and not limit their existence by developing exclusive mandatory EU logos.

Cooperation along the supply chain towards a common goal

Retailers play a crucial role in fostering this cooperation, as they are at the heart of a network ranging from farmers, food producers, logistics operators up to consumers, gathering feedback from all actors of the supply chain.

We have constantly advocated cooperation in the supply chain which is crucial to driving changes in the food supply chain towards a more sustainable food system. The latter cannot be achieved by one actor alone but only in the spirit of dialogue and exchange. The achievements under the General Food Law related to food safety are a clear example of the impact of successful supply chain cooperation. Our members also remain committed to the principles and value of stakeholder dialogue which were developed under the Supply Chain Initiative and will continue to apply these on a voluntary basis.

To ensure cooperation in the supply chain, **we ask the Commission and the member states to focus on implementing the provisions of the unfair trading practices directive in a balanced way, respecting its purpose to support small farmers and SME processors.**

We ask the Commission to facilitate developing this cooperation by defining clear goals and bringing stakeholders together.

Sustainability claims

Future EU sustainability claims would need to be based upon an agreed and science-based methodology. Experience has however shown that, in the remit of food sustainability, the issues are very diverse, making the development of an appropriate methodology for all commodities and all sustainability aspects challenging. Due to this complexity, this information can also be difficult for consumers to correctly interpret.

Accepted standards for sustainability analysis exist. PEF is an additional tool in the toolbox. Currently, we do not see an overall comprehensive and robust procedure that can be the basis for mandatory EU legislation.

Should an appropriate harmonised EU methodology become available **retail and wholesale would be ready to use this for comparing and communicating environmental impacts on a product-by-product basis to consumers.**

Animal welfare

Animal Welfare remains important for retail and wholesale. Together with our partners in the supply chain our sector has been actively promoting animal welfare improvements, by clearly labelling higher-tier products and providing consumer choice. Consumer interest varies in the different markets and the information provided needs to vary accordingly. Voluntary animal welfare labelling schemes provide this flexibility.

Our members have seized the opportunities provided by modern information technology to inform interested consumers. We ask the commission **to acknowledge and support these in the search for optimising voluntary information.**

Food Waste

EuroCommerce is fully engaged in working with the EU Food Waste platform recommendations, with special focus on date marking, food repurposing, and applying consumer research to better communicate to consumers on how to reduce food waste at home. We welcome the new regulation on food waste measurement and expect this to lead to better identification of potential hotspots where further gains can be made.

We ask the Commission to **continue to provide support to consumer research and share best practice.** We also ask for **further harmonisation of the Food Contact Material legislation and review the relevant EU regulation to allow use of food waste as animal feed.**

Global stage

When the Commission engages at bilateral or global level on certain sustainability issues, member companies immediately see a positive impact on their commitments in relation to sourcing sustainable food. We therefore ask **the Commission to maintain a strong presence on the global stage to push the sustainability agenda in line with the Farm to Fork Strategy.**

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