

## Framework for Sustainable Food Systems Key retail and wholesale messages

As part of the Green Deal, the Commission released in May 2020 its [Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system](#), aiming to create a systematic approach to sustainable change in each step of the food chain. Europe's food retailers and wholesalers, and the 11 million people working in them, are key actors in the food supply chain, providing an essential service to Europe's consumers every day. Our sector is fully aware of its responsible societal role in helping their customers make sustainable choices and has already shown its strong commitment to sustainability, but we cannot do it alone: **cooperation** with peers, suppliers and regulators is key to a successful roll-out of sustainable food systems.

Earlier this year EuroCommerce was fully engaged in the process to establish a **Code of Conduct** for responsible food business marketing and promotion and EuroCommerce and many of its company members have since signed up to the Code.

We fully endorse the need for a cross-sectoral coordinating mechanism related to the framework. This mechanism can only be effective if retail and wholesale are part of this, as key partners.

### Overarching issues

First and foremost, the framework should be **coherent** with the various food related policies and legislative initiatives. As part of this, **food safety and a science-based approach** should be kept at the heart of a framework for sustainable food system, building on the success and lessons learned in the implementation of the General Food Law. The excellent achievements in this field via the cooperation of all relevant actors in the supply chain need to be secured.

To collectively move the transition forward, more work is needed on **clarifying and agreeing on sustainability aspects** of food products, food production and distribution. This is especially important for retail and wholesale businesses in support of their voluntary initiatives, their practical operations, strategic direction and existing investments. Furthermore, a sustainable food systems framework needs to take a holistic approach i.e., including the three pillars of sustainability (economic, social and environmental).

An enabling policy environment should support all companies, in their ability to do business, differentiating themselves from their competitors, as a basic condition for an innovative market environment (and including SME's).

The framework should strengthen the single market allowing free circulation of sustainable food and preventing legal uncertainties and national initiatives. A level playing field needs to be ensured though a link with the EU trade policy.

### General principles, common definitions

The lack of a common understanding and agreement on what constitutes a sustainable food (system) is a bottleneck moving forward at European and global level, hampering operators and consumers to collectively contribute to the transition.

**Retailers and wholesalers and their suppliers have been actively engaged** since many years, responding to societal concerns. Many private (and global) initiatives are present in the market, and these can serve as an example when developing principles and definitions.

Food loss and food waste deserve a continued focus, especially at those stages where numbers are highest, to ensure a major step towards a more sustainable food supply chain.

Lastly, **traceability** principles were successfully developed and applied under the GFL as a system which, in case of a crisis allows, tracing back unsafe products to their suppliers. Applying this one-step-forward one-step-back principle should therefore be equally considered for this framework.

## Minimum requirements & responsibilities

Any potential future EU sustainability requirements (and claims), need to be science-based and accompanied by a **methodology that can be practically applied** by all. Food sustainability issues are very diverse, making the development of appropriate requirements and methodology for all commodities challenging. The practicality of a methodology would also apply to any sustainability requirements on business operators.

Retail and wholesale efforts should be facilitated by appropriate regulation, avoiding onerous requirements such as mandatory business certification. In addition, support and tools are needed to encourage and enable new business models, pilots and start-ups as part of the transition to more sustainable food systems.

It is essential to **clearly define roles and responsibilities** so that economic operators are not held responsible for activities outside their scope. This should result in a harmonised, sustainable food supply chain where trading on the EU internal market is facilitated. Where regulation is proposed, its enforceability should be confirmed, to ensure harmonised implementation.

## Consumer information

Our sector is committed to provide customers with a wide and easy choice of affordable quality products for a healthy and sustainable diet.

The principles of information to consumers as established under the FIR need to be applied to sustainability: ensuring consumer demand and understandable, science-based information. It should be assessed if this information is **nice-to-know (voluntary EU label) or need-to-know (mandatory)**, engaging consumers to further drive the market in the different realities of all Member States.

Due to its inherent complexity, sustainability information can be difficult for consumers to correctly interpret. We also perceive a large gap between consumers' views when asked in consultations and their actual buying choices. As such, sustainability labelling has its limits in nudging consumers.

Our members have seized the opportunities provided by modern information technology to inform consumers digitally. The use of digital means and choice of technology should nevertheless remain voluntary and flexible to allow innovation and avoid excessive burdens on SMEs.

More work is needed to **educate consumers on the environmental aspects** of the foods they consume. Educated responsible consumers will help the information efforts in our sector, matching consciousness when purchasing.

## Benefits of voluntary schemes

**Voluntary schemes have provided a basis for positive and mutually beneficial relationships** between producers, purchasers, and NGOs to raise sustainability standards, such as on animal welfare, the environment, social, trade etc. These standards allow for flexibility for supply chain operators to drive the sustainability agenda more ambitiously and effectively than regulation. In a highly competitive market they allow retail and wholesale to stand out from their competitors and provide a tool for consumers.

**Many such initiatives are currently operating successfully on the market.** The commitments under the Code of Conduct further provide a good insight into the breadth and depth of existing initiatives, creating market opportunities and responding to consumer expectations. The impact assessment should carefully **look at the positive role** of such private quality standards and schemes, their practicality, replicability, and their contribution to a sustainable food system together with other actors.