



FVE comments to the principles and definitions for the development of the EU Legislative Framework on Sustainable Food Systems (FSFS)

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IN BRIEF

FVE supports the objectives set out in the Farm to Fork strategy and the Commission's ambition to establish a new EU Legislative Framework on Sustainable Food Systems.

Veterinarians of Europe are at the forefront of the sustainability transition, which is essential for the health and welfare of the animals, for the protection of public health and of the ecosystems.

The animal sector contributes substantially to the European economy and is a key component of the global [agri-food systems](#).

The development of an EU Framework on Sustainable Food Systems (FSFS) is an opportunity for the EU to take a clear step into investing and creating an appropriate regulatory and non-regulatory environment for agriculture to become more sustainable -environmental, social, ethical and economical. In addition, the EU has a significant role to play in contributing to global sustainability through its policies, actions, and collaborations.

In this paper, FVE provides comments on the objectives and principles presented by the EU commission in the Advisory Group on Sustainable Food Systems (SFS) meeting of 12 July 2023.

Veterinarians play a central role in advancing sustainability in the agri-food sector by working in multidisciplinary frameworks to communicate with policymakers, farmers, and pet owners the scientific evidence behind safe food and animal production and care. More information can be found in our position papers^{1 2}. FVE already called the EU Commission to:

1. Acknowledge the efforts and outcomes achieved so far by the agri-food sector to further improve the sustainability of the EU food systems;

¹ [FVE position paper - Veterinarians commit to sustainable food systems](#)

² [Veterinarians' Contribution to the UN Sustainable Development Goals \(SDG\)](#)

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2. Further set up and align to common metrics when it comes to GHG emissions, agricultural and farming practices, circular economy and animal health & welfare standards;
3. Further set up common and measurable targets to help and assist the agricultural sectors in the transition towards the F2F objectives;
4. Further set up subsidies/taxation policies to move towards a balanced approach assisting farmers, fishermen and aquaculture producers.
5. Support policymakers to raise awareness and communicate to consumers the value of products from sustainable food systems.

Further to the Advisory Group on SFS meeting, FVE would like to comment on the presentation given on the objectives, definitions and principles, namely:

Proposed by the EU Commission	FVE comments
Definitions	<p>Definitions need to be agreed upon and serve as a level playing field and need to be globally meaningful as the EU is part of complex global agri-food systems.</p> <p>Generally, before drafting and releasing any strategy or proposal, it is preferred to first set up the general objectives addressing the real causes, the leading principles and the definitions. This results in a more efficient and useful policy process for the legislators and stakeholders</p>
Proposed definitions	
<p><u>Sustainability:</u></p> <p>“Means the process of fulfilling the needs of current generations without compromising the needs of future generations it consists of three interconnected dimensions: environmental, social (including health) and economic”.</p>	<p>Aligning this definition to the FAO definition³ may read more appropriate outlining some key elements:</p> <ul style="list-style-type: none"> - Economic sustainability: It is profitable throughout; - Social sustainability: It has broad-based benefits for society; - Environmental sustainability: It has a positive or neutral impact on the natural environment; <p>FVE would like to point out that “<i>Including health</i>” reads redundant.</p>
<p><u>Food system:</u></p> <p>“Means the entire range of actors and their related activities involved in the production, processing, distribution, consumption and disposal of food that originate from agriculture, forestry or fisheries and aquaculture and food system inputs</p>	<p>FVE underlines that there is more than one food system in Europe, that most food systems are interconnected globally, and that it is important that each region produce food sustainably in line with the natural resources and conditions.</p>

³ [FAO \(2018\) Sustainable Food Systems, Concept and Framework](#)

<p>[including the broader economic, societal and natural environments in which they are embedded]”.</p>	<p>Aligning this definition to the one provided by the WHO may be more appropriate: <i>Food system: “Means the entire range of actors and institutions and their related activities involved in the production, processing, distribution, consumption and disposal of food that originate from agriculture, forestry or fisheries and aquaculture and food system inputs [including the broader economic, societal and natural environments in which they are embedded]”.</i></p>
<p><u>Sustainable diets</u></p> <p>Means diets that are of adequate quantity and quality to achieve optimal growth and development of all individuals and support functioning and physical, mental and social wellbeing, protective and respectful of the environment, [biodiversity and ecosystems]; culturally acceptable; accessible, economically fair and affordable; safe and health-promoting and disease-preventing, providing adequacy, without excess of nutrients and health-promoting substances from nutritious foods and contributing to food security [and to healthy life] for present and future generations”.</p>	<p>Aligning this definition to the one provided by the FAO one may read more appropriate⁴ “<i>Sustainable diets are those diets with low environmental impacts which contribute to food and nutrition security and healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible, economically fair and affordable; nutritionally adequate, safe and healthy; while optimizing natural and human resources</i>” reads more appropriate.</p> <p>The reference to ‘excess of nutrients and health-promoting substances from nutritious foods’ reads confusing. The excess, as well as the lack of nutrients,⁵ are both important. Clarity on ‘nutritious food’, “unsafe”, “excessive intake” or “lack of intake” is desirable.</p>
<p><u>Environmental dimension of sustainability</u></p> <p>“Means all aspects relating to climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection of biodiversity and ecosystems”.</p>	<p>Reference to ecosystems and soil health would be desirable.</p>

⁴ [Sustainable diets and biodiversity, Directions and solutions for policy, research and action, Proceedings of the International Scientific Symposium Biodiversity and sustainable diets united against hunger, 3–5 November 2010 FAO Headquarters, Rome.](#)

⁵ [Micronutrient deficiencies remain widespread globally, especially in low- and middle-income countries and among population groups with increased needs, where diets are often inadequate in iron, zinc, folate, vitamin A, calcium, and vitamin B12”](#)

<p><u>Social dimension of sustainability</u></p> <p>“Means all aspects that pertain to healthy diets including food safety aspects, animal health, welfare and plant health, responsible business practices, and fair employment.”</p>	<p>The social dimension covers certainly the concept of “healthy diets” but it should also consider affordability and all the other socio-cultural elements as acknowledged by WHO⁶. Healthy, sustainable and affordable diets should also refer to animal feed, including for companion animals.</p>
<p><u>Economic dimension of sustainability</u></p> <p>“Means all aspects that pertain to a fair distribution of returns and other impacts across the food system.”</p>	<p>FVE underlines the following:</p> <ol style="list-style-type: none"> 1. <u>Aligning this definition with the FAO one may read more appropriate:</u> <i>“A sustainable food system (SFS) is a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised. This means that: – It is profitable and affordable throughout (economic sustainability); – It has broad-based benefits for society (social sustainability); and – It has a positive or neutral impact on the natural environment (environmental sustainability)”⁷.</i> 2. Considering one of the key pillars of the EU, the <u>Single Market</u> which ensures the free movement of goods, thus the legislative framework on SFS should have enough safeguards. The EU SFS framework needs to work effectively within global systems and the many places EU interacts with them.
<p>Overarching Objectives</p>	<p>Objectives should apply to all actors</p>
<p>List of sustainability objectives</p>	
<p><u>Environment:</u></p> <ul style="list-style-type: none"> • Climate change mitigation and adaptation; • Sustainable use and protection of land, soil, air and water • Protection and conservation of aquatic 	<p>FVE suggests aligning the definition of food loss and food waste to the ones from FAO⁸ that may read more appropriate. Feed, including companion animal feed, should also be considered.</p>

⁶ [WHO guiding principles on sustainable and healthy diets](#) (2019)

⁷ [FAO \(2018\) Sustainable Food Systems, Concept and Framework](#)

⁸ [Technical Platform on the Measurement and Reduction of Food Loss and Waste](#)

<p>resources</p> <ul style="list-style-type: none"> • Transition to a circular economy, including food loss and food waste reduction • Pollution prevention and control <p>Protection and enhancement of biodiversity and ecosystems</p>	
<p>Social:</p> <ul style="list-style-type: none"> • High level of animal health and welfare and plant health; <p>Promotion of sustainable diets, ensuring the right of people, including vulnerable groups, to a food environment that provides and promotes access to such diets.</p> <ul style="list-style-type: none"> • Contribution to decent work and adequate living standards, inclusive and sustainable communities and societies; • Preservation of cultural and food heritage. 	<p>We suggest to replace “environment” with “systems”.</p> <p>Access to food (food security and food availability) is determined by several factors that go beyond strictly the food environment. Food fraud can have significant implications for sustainability across various dimensions, including environmental, economic, and social aspects.</p>
<p>Economic:</p> <ul style="list-style-type: none"> • Contribution to a fair distribution of returns across the food system, in particular by ensuring a fair price for SMEs (including farmers, aquaculture producers and fishers); • Transparency and accountability across the supply chain; • Responsible business practices, including marketing in advertising. 	<p>FVE underlines that this terminology read vague and confusing and not evidence-led. Please see the comment above on the <u>Economic dimension of sustainability</u>.</p>
<p>Principles</p>	<p>Considering the trade-offs between different sustainability objectives, it is of paramount importance that the leading principles ensure balance and proportionality between the four pillars of sustainability (environmental, social, ethical and economical). The ability to baseline and measuring them is therefore crucial.</p>
<p>Proposed Principles</p> <ul style="list-style-type: none"> • Food security • Do not significant harm • Fairness and just transition • Collaboration and public engagement • One Health • Transparency • Circularity • Innovation 	<ol style="list-style-type: none"> 1. <u>Science-based decision making</u>: this should be included among the principles and under the “aim and scope” as is the case in the General Food Law Reg. No. 178/2002 2. <u>Free movement of goods</u>: the free movement of food products in the EU Single Market should be

	<p>included among the principles.</p> <p>3. <u>Research & innovation principle</u>: the Legislative framework on SFS represents an opportunity for the EU. R&I are key drivers for the present and future of the EU society, acknowledged by the European Commission and other EU institutions over the years. Legislation needs to support R&I and enable the transition. To achieve more sustainable food systems, we need to promote better access to R&I whereas in the area of animal health & welfare, precision animal agriculture, food processing and safety, digitalisation, traceability, monitoring and data analysis, better breeding, better feeding and preventive animal health visits play a key role.</p> <p>4. <u>Do No Significant Harm (DNSH) principle</u>: to FVE knowledge the DNSH principle is provided in the EU Taxonomy Regulation (classifying economic activities as environmentally sustainable) and in the Sustainable Finance Disclosure Regulation (SFDR) so basically in the environment area and the sustainable finance policy framework. Clarity on this principle and thorough assessment is necessary.</p> <p>5. <u>Food security</u>: the inclusion of this principle is crucial. Any sustainable food systems should also ensure food security (availability, affordability, and accessibility).</p>
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Notes for Editors

The Federation of Veterinarians of Europe (FVE) represents around 300,000 veterinarians across 39 European countries. The Federation of Veterinarians of Europe (FVE) aims to enhance animal health, animal welfare, and public health and to protect the environment by promoting the veterinary profession.

For further information, consult the FVE website www.fve.org FVE Secretariat
Tel: +32 2 533 70 20 or e-mail: info@fve.org