



# VALUING FOOD

**FOR A GAME-CHANGING EU  
LEGISLATIVE FRAMEWORK FOR  
SUSTAINABLE FOOD SYSTEMS**

WWF vision paper  
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## SUMMARY

The impact of food systems can be felt in our daily lives - they are an essential pillar of our societies and economies, but at the same time massively contributing to biodiversity loss and climate change. The way we produce and consume food is not only unsustainable, but also detrimental to our own health. Currently, our food systems are responsible for 34% of global CO<sub>2</sub> emissions<sup>1</sup> and for the unhealthy diets behind the deaths of 1 in 5 Europeans<sup>2</sup>.

To tackle this, the European Commission placed the *Farm to Fork Strategy for a fair, healthy and environmentally friendly food system* at the heart of the European Green Deal, and announced a flagship *EU legislative framework for sustainable food systems* for late 2023. This new EU law will aim to integrate sustainability into all food-related policies, while addressing the inextricable links between healthy people, healthy societies and a healthy planet.

WWF welcomes the Commission's commitment to rethink and transform our food systems, and believes that to make them truly sustainable, this new law must include the following elements:

- 1. Set mandatory 2050 targets:** Establish a 2050 vision for sustainable food systems to provide a clear direction and ensure coherence among food-related policies. This must include intermediate and final binding targets that apply to the entire food system, from production to consumption, as well as a comprehensive evaluation mechanism to monitor progress.
- 2. Shift consumption:** Support the adoption of healthy and sustainable diets and the protein transition<sup>3</sup>. This must entail using all policy tools to tackle key aspects of the food system, such as food characteristics (i.e. appearance, nutritional content), length of supply chains, public procurement, advertising and promotion, dietary guidelines, retail and other food services.
- 3. Lower prices of sustainable food:** Strive to make healthy and sustainable diets the cheapest option for consumers. By adopting policy measures that are informed by the true cost of food, and which take into account environmental and social impacts while preventing unfair competition, this will also foster more sustainable production.
- 4. National action plans and sustainability rules for business:** Create new obligations for large food businesses - so they improve the sustainability of the food supply chain - and require national governments to complement EU action through national food plans. This will ensure that these actors are accountable with transparent and EU-standardised reporting requirements.
- 5. Improve food systems governance:** Renew the governance of EU food policies, including by creating a scientific advisory board and a platform for locally-led initiatives for sustainable food systems. Making it more inclusive and science-based will ensure fairness and adaptive management capacity during the transition.

<sup>1</sup> Crippa, M., Solazzo, E., Guizzardi, D. et al. Food systems are responsible for a third of global anthropogenic GHG emissions. *Nat Food* 2, 198-209 (2021). <https://doi.org/10.1038/s43016-021-00225-9>

<sup>2</sup> European Commission. 2022. *Factsheet: From farm to fork: Our food, our health, our planet, our future.*

<sup>3</sup> Protein transition in diets consists of eating considerably less animal protein and more plant-based and alternative sources of protein.

# INTRODUCTION

## CONCRETE STEPS TOWARDS SUSTAINABLE FOOD SYSTEMS ARE URGENTLY NEEDED

The COVID-19 pandemic has reminded us all of the importance of a socially just and resilient food system, and of how the health of people, animals and the planet are closely interlinked. The global humanitarian catastrophe created by the war in Ukraine, and which is partly caused by shortages of food, feed and fertiliser supplies, has exposed some of the weaknesses of the global agri-food system. It has also shed light on the EU's dependence on imported fossil fuels and agricultural commodities.

The EU imports more calories and proteins than it exports<sup>4</sup>, and is therefore not in the strongest position to cover any supply gap in the international markets. In other words, the EU is eating the world, but not feeding it. Despite being a major trader of agri-food and seafood, EU food systems are mainly designed to produce high added-value products, including many animal source foods. Although this has a positive impact on the EU economy, the food we produce and consume has low nutritional value. Supporting healthier planet-based diets and addressing the wasteful consumption of feed and food are ultimately crucial steps that the EU has to take to lower the local and global impacts of its food system. This will also give the EU the opportunity to make a greater contribution to food security and resilience.<sup>5</sup>

Halfway between the adoption of the United Nations 2030 Agenda and the deadline for achieving the Sustainable Development Goals, progress towards many food-related targets is too slow and requires a renewed political impetus. The upcoming legislative framework for sustainable food systems can make a major contribution to this global and European agenda. It must embrace the urgent need for food systems transformation and help create the right EU policy environment to achieve it.



4 WWF. 2022. *Europe eats the world*.

5 SAPEA, Science Advice for Policy by European Academies. 2020. *A sustainable food system for the European Union*.

## WHAT IS A SUSTAINABLE FOOD SYSTEM?

While there is no settled universally agreed definition, the working definition proposed by the Science Advice for Policy by European Academies (SAPE) in 2020, and used by the European Commission, underlines the multiple dimensions and complexity of food systems:

*“A sustainable food system for the EU is one that provides and promotes safe, nutritious and healthy food of low environmental impact for all current and future EU citizens in a manner that itself also protects and restores the natural environment and its ecosystem services, is robust and resilient, economically dynamic, just and fair, and socially acceptable and inclusive. It does so without compromising the availability of nutritious and healthy food for people living outside the EU, nor impairing their natural environment.”*

Source: SAPEA

# WWF'S VISION FOR THE SUSTAINABLE FOOD SYSTEM LAW

The new legislative framework for sustainable food systems is an exceptional opportunity for the European Commission to make current and future EU food-related policies play a stronger role in making European food systems sustainable. To achieve this goal, WWF considers that the new law should take the following steps:

## 1. SET MANDATORY 2050 TARGETS

**The new law should establish a 2050 vision for sustainable food systems, setting a clear long-term direction for European food systems and with a focus on human health, environmental protection and social equity.**

The vision should be complemented with a first series of **SMART<sup>6</sup> targets to be achieved 10 years after the adoption of the law** (see Annex for details) and with a comprehensive **“Sustainable Food Systems Dashboard”**, gathering EU-level and national data to robustly monitor progress towards the vision and targets pursued.

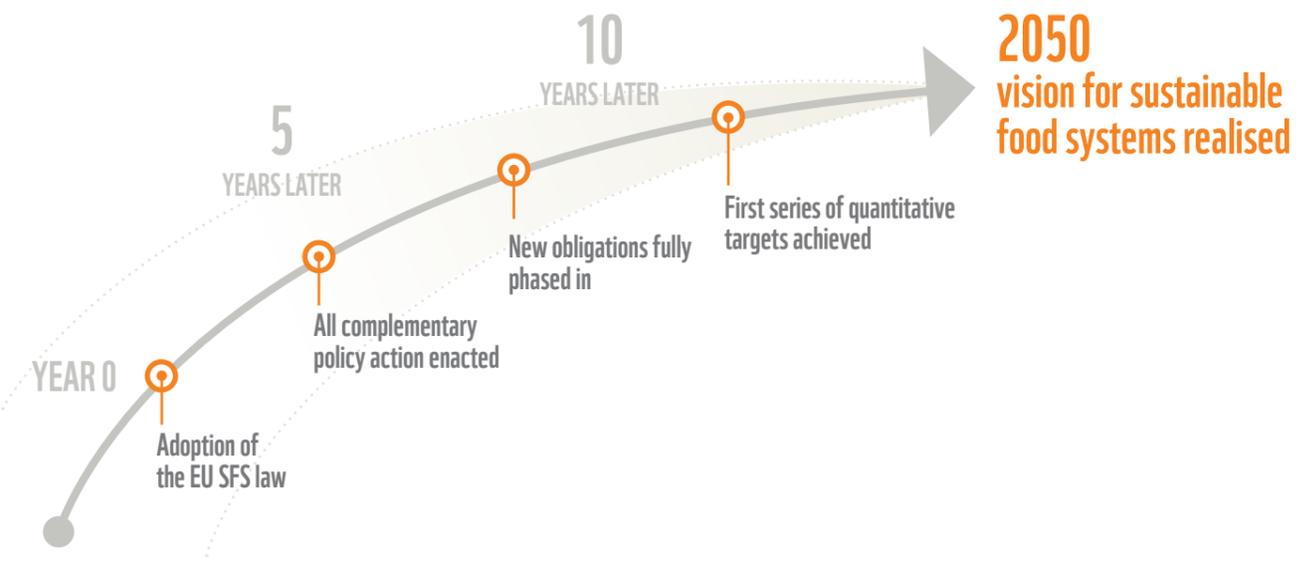
To make rapid progress, **all complementary policy action** (including the revision of existing laws and new legislation) **should be enacted soon after the adoption of the Sustainable Food System Law and by 2030 at the latest**. Robust regulation and policy coherence must guide and facilitate a just transition for producers and other economic actors.

## WHY IS A FRAMEWORK LAW FOR A SUSTAINABLE FOOD SYSTEM NEEDED IN THE EU?

As presented in the Farm to Fork Strategy, one of the main objectives of this legislative framework is to promote policy coherence at EU and national levels, mainstream sustainability in all food-related policies and strengthen the resilience of food systems.

This is largely in agreement with the assessment of food-related legislative interventions recently published by the FAO, where they suggest that *“the purpose of a framework law is to integrate transformative food systems' perspective across different regulatory areas, establishing cross-cutting principles and mechanisms for institutional coordination. It generally does not enter into detailed technical content, as this is left for the sectoral laws that will have to implement and enforce the orientations set in the framework”*.

Source: FAO<sup>7</sup>



6 SMART: Specific, Measurable, Achievable, Relevant and Time-bound.

7 FAO. 2021. *Transforming agri-food systems: legislative interventions for improved nutrition and sustainability*.

## 2. SHIFT CONSUMPTION

*The new law should act decisively on food consumption, creating environments that foster dietary changes, which not only support nature-positive food production but also improve human health.*

A reliable, transparent and comprehensive assessment of the sustainability of food products could be instrumental in this endeavour, but this process could still take several years. Therefore, parallel **action should be initiated immediately to favour** food options such as **plant-based, organic and fairtrade foods**, already taking a solid step towards the protein transition and more sustainable consumption.

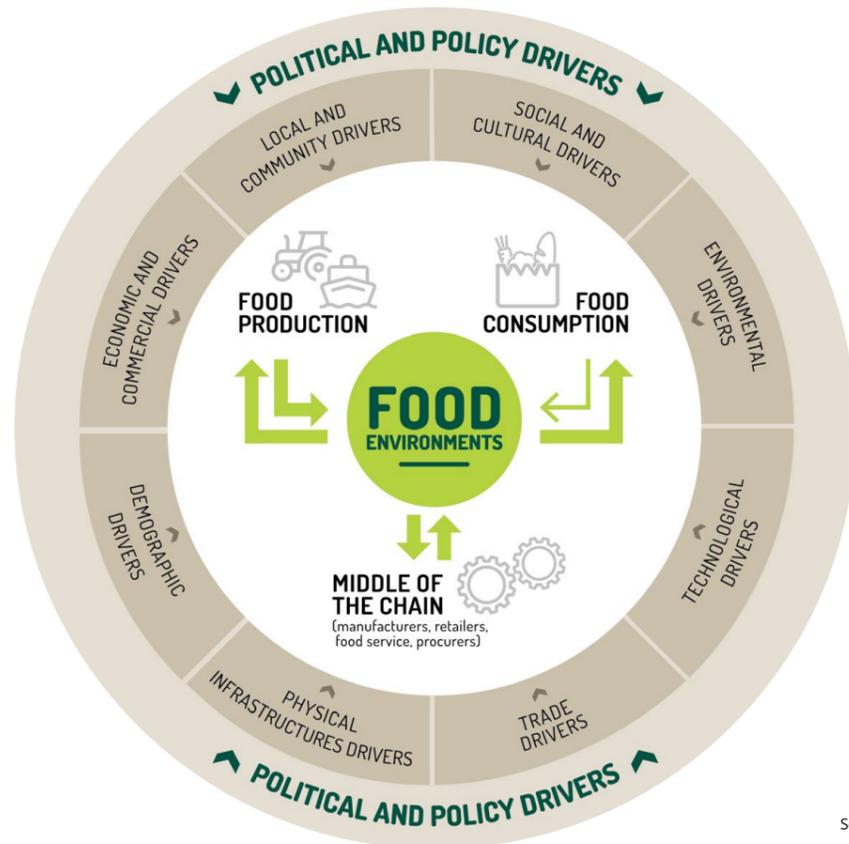
**Shifting consumption** at the necessary pace and scale requires that the contexts in which food choices are made become **more conducive to healthy sustainable diets**. This law should not rely on food labelling and on the limited agency of informed consumers to make better choices and drive demand for sustainable food. This legislative framework **should adopt a wide-reaching food environments<sup>8</sup> approach**: it should use all policy levers to also tackle aspects such as food characteristics (i.e. appearance, nutritional content), length of supply chains, public procurement, advertising and promotion, dietary guidelines, retail and other food services.

## 3. LOWER PRICES OF SUSTAINABLE FOOD

*The new law should strive to make healthy and sustainable diets the cheapest option for consumers, as lower prices will provide the right signal and help drive change in production and consumption.*

Considering that the rules that govern markets hardly consider health, social and environmental externalities, **policy interventions - informed by the true costs of food - are necessary**. Reducing taxes on certain food categories and reorienting subsidies and public investment to increase the availability of food produced at higher socio-environmental standards are just two of the actions that could help achieve this objective. To prevent unfair competition, this should be complemented by restrictions on importing or placing products on the European market that do not meet **minimum mandatory requirements in terms of sustainability**.

**Food businesses also have a direct responsibility**, as they may seek greater margins on sustainability-certified products or try to attract consumers with promotions that artificially lower the prices of less healthy food options. **Such actions need to be prevented, including through regulation where needed**, and make business practices on food pricing align with health and sustainability goals.



Source: EU Food Policy Coalition<sup>9</sup>

<sup>8</sup> Food environments can be defined as "the physical, economic, political and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food". High Level Panel of Experts. 2017. *Nutrition and food systems. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security*, Rome.

<sup>9</sup> EU Food Policy Coalition, 2021. *Food Environments & EU Food Policy - Discovering the role of food environments for sustainable food systems*.

## 4. NATIONAL ACTION PLANS AND SUSTAINABILITY RULES FOR LARGE BUSINESS

*The new law should create new obligations for national governments and large food businesses, which should be commensurate with their power and responsibility to lead food system transformation.*

As many of the areas of EU action relevant for food are under shared competence, the law should **require additional coordinated action from Member States**, which could be set out in national action plans with a clear mandate and accountability mechanisms. Such plans should include areas such as **food taxation, dietary advice and public procurement**, which are typically within the remit of (sub-)national governments and are crucial in achieving the common sustainability goals.

**New sustainability rules for large food businesses**, such as major manufacturers, traders and retailers, **should be phased in progressively in the first five years of application of the new law**, alongside incentives for SMEs to follow suit. Monitoring and transparent reporting on key aspects of the socio-environmental performance of food businesses, and remunerating their domestic or international supply chains for lowering their impacts, should become a basic obligation under the law, alongside requirements to improve their sustainability performance over time.

## 5. IMPROVE FOOD SYSTEMS GOVERNANCE

*The new law should renew the governance of EU food policies and their implementation, to ensure a more inclusive, participatory and science-based transformation of food systems.*

The law should **establish a European Scientific Advisory Board on Sustainable Food Systems** to ensure science-based evaluation and feedback on the transition path. The board should ensure a diverse composition of scientists with strong social and environmental expertise. The European Environment Agency should be mandated to gather data from Member States and provide sound independent information on all environmental aspects of food systems.

In order to involve **food system actors** from the ground, exchange best practice and inform policy-making, the Scientific Advisory Board should be complemented by **an EU platform of locally-led initiatives for sustainable food systems**. The platform should address power imbalances and prioritise the participation of those who are engaged in food councils and similar initiatives, and in grassroots initiatives and enterprises, but have less agency and voice in EU fora, such as socio-economically marginalised communities, small-scale producers, and young citizens.

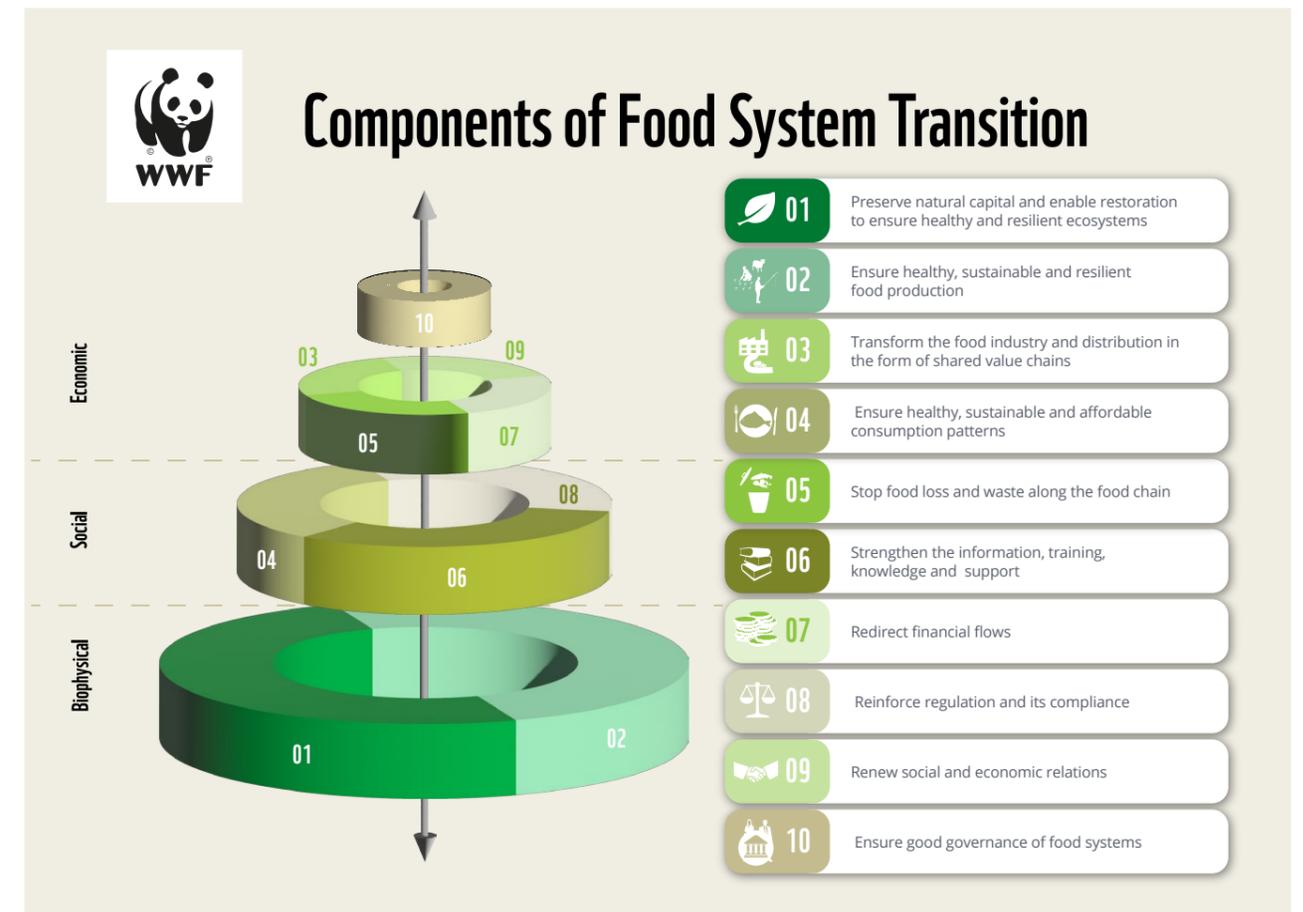


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# ANNEX - SMART TARGETS THAT THE EU SUSTAINABLE FOOD SYSTEM LAW COULD INCLUDE

For WWF's vision of EU Sustainable Food Systems to be realised, progress needs to be made on all components of a holistic food system transition. To provide clear guidance and predictability to food system actors, SMART targets should be set out in this new EU law, with governance mechanisms to ensure the achievement of the first set of intermediate targets 10 years after the adoption of the law at the latest. See below for some examples of such targets:

Components of a holistic food system transition	WWF examples of targets to be set up, with indicative values to be achieved 10 years after the adoption of the legislative proposal at the latest.
1. <b>Preserve natural capital</b>	1 Pollinator populations & Grassland Butterfly Index at satisfactory levels or with increasing trends in all Member States.
2. <b>Sustainable and resilient food production</b>	2 Annual catches in 100% of fish stocks supplying EU markets are at their maximum sustainable yield level or below.
3. <b>Transforming the food industry and distribution</b>	3 At least 50% of the food industry has established protocols that fairly remunerate producers in their supply chain for lowering their climate & environmental impacts and for nature-positive practice.
4. <b>Healthy, sustainable and affordable food consumption</b>	4 Protein in the average European diet is 40% animal-based and 60% plant-based.
5. <b>Slash food loss and waste</b>	5 All EU Member States have updated their national strategies on food loss and waste to also measure and address fish bycatch/discards and farm-level food waste.
6. <b>Strengthen information, training and knowledge</b>	6 Public funding for the Agricultural Knowledge and Innovation Systems is increased to 2% of the CAP and EMFF budgets, and at least half of it is ring-fenced for climate and environmental action.
7. <b>Redirect financial flows</b>	7 Value added taxes on organic fresh fruit and vegetables in all EU countries have been reduced to their lowest possible level.
8. <b>Reinforce regulation and compliance</b>	8 All use of water in agriculture and aquaculture is legal and contributes to the achievement of the objectives of the Water Framework Directive and the Marine Strategy Framework Directive.
9. <b>Renew social and economic relations</b>	9 All food placed in the EU market has been produced / transformed in full respect of labour rights and offering a fair pay to vulnerable workers in the supply chain.
10. <b>Ensure good governance.</b>	10 A fully functional coordination mechanism between the EU and national and subnational governments has been set up to act consistently for food systems transformation.



Source: WWF-Spain, the 10 elements of the food systems transition<sup>10</sup>

The ten components presented in the table and figure above are part of a proposal developed by WWF-Spain for a food system transition scorecard. Intended as a monitoring and evaluation tool, the scorecard should be further developed by public authorities to overcome the lack of a systemic vision, facilitate cross-sector coordination and drive change

throughout the food system. The development of the proposal has revealed that there is frequently a lack of baselines for setting appropriate targets, and a need to improve data collection and data interpretation systems, as well as the coordination between existing databases to better measure and manage the achievement of results.

<sup>10</sup> WWF-España. *Alimentando el cambio*, (upcoming report).

# WWF'S MISSION IS TO STOP THE DEGRADATION OF THE PLANET'S NATURAL ENVIRONMENT AND TO BUILD A FUTURE IN WHICH HUMANS LIVE IN HARMONY WITH NATURE

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