

# EUROPEAN ECONOMIC AREA

## STANDING COMMITTEE OF THE EFTA STATES

Ref. 20-2456

3 March 2021

### SUBCOMMITTEE I ON THE FREE MOVEMENT OF GOODS

#### EEA EFTA COMMENT

#### **on the Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system (COM(2020) 381)**

#### **1. EXECUTIVE SUMMARY**

1. The EEA EFTA States welcome the European Commission Communication “A Farm to Fork (F2F) Strategy for a fair, healthy and environmentally-friendly food system” and acknowledge that the Strategy is at the heart of the European Green Deal.
2. The EEA EFTA States remain dedicated to continuing as constructive partners in the regulatory processes as regards EEA-relevant legislative initiatives under the Farm to Fork Strategy. They emphasise that any regulatory initiatives must be thoroughly and holistically assessed with regard to impacts on food systems, environmental impacts, and overall societal objectives.
3. The EEA EFTA States welcome the Commission’s intention to propose a legislative initiative setting out a framework for sustainable food systems and look forward to the deliberations on the respective proposals, while recognising that parts of the proposals may be outside the scope of the EEA Agreement.
4. The EEA EFTA States are dedicated to join the EU in promoting the global transition to sustainable food systems in international standardisation bodies and relevant multilateral fora, including the cooperation to promote safe food, reduced carbon and environmental footprints, animal welfare and the fight against antimicrobial resistance.

#### **2. GENERAL COMMENTS ON THE FARM TO FORK STRATEGY**

5. The EEA EFTA States welcome the European Commission Communication “A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system”, hereinafter the F2F Strategy. The EEA EFTA States acknowledge that the F2F Strategy

is at the heart of the European Green Deal and that it comprehensively addresses the challenges of sustainable food systems and recognises the links between food systems, healthy people, healthy societies and a healthy planet.

6. The EEA EFTA States recognise that the F2F Strategy contributes to the implementation of the United Nations Agenda 2030 with its Sustainable Development Goals, the Paris Agreement on climate change and the goals set out in the Convention on Biological Diversity.
7. The EEA EFTA States support the development of sustainable food systems, from production to consumption, at national, European, and global level. Much more needs to be done to ensure the health of the public and the planet. The environmental and climate footprint of our food systems should be reduced, taking duly into account the planetary boundaries and the precautionary principle. Furthermore, we endorse measures that should lead to greater appreciation of food and to improved health.
8. The EEA Agreement extends the Internal Market of the EU to the EEA EFTA States, Iceland, Liechtenstein<sup>1</sup> and Norway, and also provides the legal basis for cooperation beyond the four freedoms. The EEA Agreement therefore covers many areas under the F2F Strategy such as food and veterinary matters, chemicals, and fertilisers. While the Common Agriculture Policy and the Common Fisheries Policy are outside the scope of the EEA Agreement, the EEA EFTA States are dedicated to continuously evaluating their relevant national policies in these areas, in light of common international goals such as the United Nations Agenda 2030 for Sustainable Development.
9. The EEA EFTA States remain dedicated to continuing as constructive partners in the regulatory processes as regards the legislative initiatives under the F2F Strategy which fall within the scope of the EEA Agreement. To this end, the EEA EFTA States recall the participatory rights according to the EEA Agreement, especially Articles 99-101 on the participation of the EEA EFTA States in the regulatory processes.
10. The EEA EFTA States agree that, in addition to new legislative initiatives, proper enforcement of the existing legislation as regards food production from farm to fork, as well as existing legislation as regards environmental protection, is essential for sustainable food systems.
11. The EEA EFTA States emphasise that any regulatory initiatives must be thoroughly and holistically assessed with regards to impacts on food systems, environmental impacts and overall societal objectives.

### **3. REMARKS ON THE INITIATIVES PROPOSED BY THE F2F STRATEGY**

12. The EEA EFTA States welcome the Commission's intention to propose, at the latest by the end of 2023, a legislative initiative setting out a framework for sustainable food

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<sup>1</sup> EU legislation regarding food and veterinary matters that has been incorporated into the EEA Agreement shall not apply to Liechtenstein as long as the application of the Agreement between the European Community and the Swiss Confederation on trade in agricultural products is extended to Liechtenstein, as specified in the sectoral adaptations to Annex I to the EEA Agreement.

systems and look forward to the deliberations on the respective proposals, while recognising that parts of the proposals may be outside the scope of the EEA Agreement.

13. We strongly support the Commission's view that it is important to reduce the dependency on chemical plant protection products and to reduce the risk related to the use of these products. Integrated pest management will be a valuable tool to achieve this. We furthermore welcome other initiatives, such as reinforcing the environmental risk assessment of chemical plant protection products and revision of the Sustainable Use of Pesticides Directive.
14. The EEA EFTA States strongly support actions to reduce the overall use of antimicrobials to food producing animals by taking a One Health approach, inter alia by means of the wide range of measures in the new regulations on veterinary medicinal products and medicated feed.
15. The announcement in the F2F Strategy that the existing animal welfare legislation is to be reviewed in the light of the latest scientific knowledge is welcomed. The EEA EFTA States consider that regulations in this field should put in place minimum criteria and that stricter regulations can be applied based on national circumstances. Furthermore, proper enforcement of the legislation is of importance to achieve better welfare and a level playing field.
16. The transition to a circular economy significantly contributes to environmental and climate goals and the EEA EFTA States therefore welcome modernised legislation that enable safe re-use and recycling of resources which are recovered from waste, manure or by-products.
17. The EEA EFTA States welcome the intended measures regarding new and innovative feed ingredients and techniques, which may play a role in increasing sustainability, provided that they are safe for humans, animals, and the environment, while bringing benefits for society as a whole. We welcome the Commission's study in light of the judgement of the Court of Justice of the European Union in Case C-528/16 regarding the status of novel genomic techniques under the EU legislation. Norway has recently established a public committee to prepare a Green Paper on gene technology, inter alia new genomic techniques.
18. The EEA EFTA States fully agree that sustainable food systems also rely on seed security and diversity. Thus, we welcome measures by the Commission to ensure easier market access for traditional and locally adapted varieties. Plant and animal breeding need to be part of the implementation of the F2F strategy to ensure the continuous development of appropriate propagating material and robust animals, and to improve plant and animal health and sustainable intensification to mitigate and adapt to climate change.
19. The EEA EFTA States emphasise the need to maintain a high level of food safety and support further actions that strengthen the food safety system and combat food fraud at all stages from farm to fork.

20. We welcome the Commission's plans to revise the food contact materials legislation to improve food safety, ensure citizens' health and reduce the environmental footprint.
  21. The EEA EFTA States support the ambitions to counter the increased incidence of cardiovascular diseases, excess weight and obesity and agree that current food consumption patterns need to become more sustainable both from a health and an environmental perspective.
  22. The EEA EFTA States concur on the importance of promoting the reformulation of foods and on setting up nutrient profiles and front of pack nutrition labelling in line with guidelines on a healthy and sustainable diet (e.g. for salt, sugar, and saturated fat). They agree on the role of suitable and easily understandable consumer information as an integral part of an improved food environment to promote food consumption patterns that are healthy as well as sustainable and climate friendly.
  23. The EEA EFTA States share the commitment to the Sustainable Development Goal 12.3 to halve food loss and waste and therefore emphasise the need for a revision of the EU rules in order to prevent the misunderstanding or misuse of date marking.
  24. We welcome the Commission's initiative in seeking improved labelling of origin or provenance for certain products, but emphasise the need for an impact assessment, including, for instance, on the benefits for consumers and producers, and the impact on the internal market of a harmonised approach to mandatory declarations of origin or provenance.
  25. The EEA EFTA States welcome the fact that the F2F Strategy also highlights research and innovation as a means of achieving sustainable food systems. That includes green and digital innovation and biotechnology, provided they are safe for human health and the environment, which should contribute to a wide-scale change of food production practices.
  26. The important role of imports on the carbon and biodiversity footprint of the EU's food system is recognised and we invite the European Commission to propose appropriate measures to reduce the impact of imports, while complying with international rules.
  27. Finally, the EEA EFTA States are dedicated to join the EU in promoting the global transition to sustainable food systems in international standardisation bodies and relevant multilateral fora, including the cooperation to promote safe food, reduced carbon and environmental footprints, animal welfare and the fight against antimicrobial resistance.
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