



Tweede Kamer

DER STATEN-GENERAAL

To European Commission
European Commissioner Wojciechowski
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Standing Committee for Agriculture, Nature and Food Quality
House of Representatives of the States General
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Subject Political dialogue – response to the consultation for a sustainable EU food system

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Dear Commissioner Wojciechowski,

Following the opening of the Sustainable EU Food System¹ consultation, the standing committee for Agriculture, Nature and Food Quality of the Dutch House of Representatives of the States General has decided to send you a letter within the context of the political dialogue with the European Commission. Below, you will find comments and questions from several parliamentary groups in the Dutch House of Representatives.

Comments and questions of the parliamentary groups in the House of Representatives

The parliamentary groups of the House of Representatives of the States General (hereinafter: the parliamentary groups) acknowledge the importance of the transition towards sustainable EU food systems. As one of the parliamentary groups stated, it is good that the Commission is highlighting the importance of achieving the targets in the areas of climate, biodiversity and other objectives. According to some groups, making agriculture more sustainable should be the priority of the Green Deal, and the Farm to Fork strategy is currently insufficiently geared towards this sustainability. According to some groups, a sustainable balance between climate and nature on the one hand and people's needs on the other is the only way to create socioeconomic security for people in the long term.

The parliamentary groups regard a number of issues as key aspects in this transition. These issues are elaborated below.

¹ [Sustainable EU food system – new initiative \(europa.eu\)](https://europa.eu)



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Revenue model of farmers

According to the parliamentary groups, an important aspect of the transition to a sustainable EU food system is the improvement of the farmers' position in the chain and a realistic improvement of the farmers' revenue model. This should be the basis of every step towards improved sustainability. One of the parliamentary groups points out that the intended sustainability goals will be difficult to achieve if a farmer does not have the money to invest in improved sustainability. A few of these groups also mention the importance of a good sales market for sustainable products. According to one of the groups, it is currently apparent - at least in the Netherlands - that the production of sustainable products often exceeds the demand, resulting in surpluses. The production of sustainable products is thereby indirectly discouraged. In addition, we must ensure value creation in the chain, so that both the profits and the losses are distributed in the chain in a fair manner. Some parliamentary groups feel that there is a good chance that Europe will have to adapt its consumption pattern to what European agriculture can produce sustainably. These groups believe that supply should become dominant instead of demand, because supply determines the limits of what is possible. According to these groups, European agriculture is able to produce a healthy, tasty and sustainable food supply for everyone, but we have to accept that this may differ from what we are used to.

One of the groups also emphasises the importance of food autonomy in the above context. When setting new sub-targets, it is important to first calculate what consequences this will have for the income of food producers and the food prices for citizens. To what extent does the Commission expect additional sustainability targets set by the EU to lead to extra costs for farmers and market gardeners, a sector that already has to work with very small profit margins?

Fair price

According to one of the parliamentary groups, ensuring a fair price in the chain is now often hampered by well-intentioned regulations to prevent price-fixing agreements. What initiatives does the European Commission intend to take to remove the obstacles currently standing in the way of a fair price? How will the Commission prevent a multitude of sustainability certificates from being created, leaving consumers unable to see the wood for the trees, so to speak?

Chain agreements also play an important role in the context of a fair price. Chain agreements can play a role in making agriculture more sustainable, with the primary aim being that farmers receive a fair price for sustainable products and that all chain parties are obliged to contribute to sustainability.

Level playing field at the European level

An important aspect for the parliamentary groups is the creation of a level playing field in the EU. A sustainable food system starts with the creation of a level playing field.

According to some groups, the EU should therefore ensure that this also applies within member states, and that directives are interpreted in the same way.

In the context of a level playing field, it is important that countries do not differ too much from each other in the area of sustainability. Farmers in a certain country should not be



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disadvantaged due to their country having stricter rules than other countries, resulting in a higher cost price while the purchase price remains the same. The purchase price also remains low, because the buyer will otherwise get the products from another country, where they are cheaper. This is also a threat to the revenue model of the farmer and therefore also to the further sustainability of the sector, according to one of the parliamentary groups.

In the context of the level playing field, one of the parliamentary groups cites a concrete case, namely the targets in the Water Framework Directive. This group is concerned that the principle of "one out, all out" will lead to an unequal playing field for member states. After all, the Netherlands has its measurement system in order, unlike other member states. How will the Commission prevent an unequal playing field from arising between member states, and can the Commission guarantee that all member states will have their measuring systems in order when the Water Framework Directive enters into force, so that member states that do not cannot evade the principle of "one out, all out".

International trade

The parliamentary groups draw attention to the international trade aspect of making the EU food system more sustainable. One of the groups asks whether products from European countries will be seen as more sustainable than products from the rest of the world, since shorter chains lead to less environmental impact? To what extent is the country of origin of a food product also a sustainability target? According to one of the groups, the European Commission must ensure that we do not import food products into the EU that do not meet the same requirements that we set for products produced within the EU. This not only concerns the Carbon Footprint, for example, but also the use of crop protection products. We want the EU Commission to make this a priority to ensure that our food producers are not priced out of the global market.

According to one of the other parliamentary groups, making the EU food system more sustainable would require an exception to be made for agriculture in international free trade agreements. It is already virtually impossible for agricultural entrepreneurs to compete with the rest of the world with the high price of land, let alone if stricter production standards (which go beyond the current product standards) apply in Europe than for other imported items. Moreover, stricter production standards would not be checked either.

Some other parliamentary groups point out that European agriculture has a major impact on the environment, nature and economies elsewhere through the import and export of raw materials and products. This can contribute to food security elsewhere, but it often also leads to destruction of nature, land use change, exploitation and destabilisation of local markets, long transport distances and increased use of fertilizers and herbicides/pesticides. These groups feel that the socioeconomic and ecological consequences of European agricultural practices elsewhere should be part of the assessment framework for a sustainable EU food system. According to these same groups, the import and export often have a disruptive impact on food markets outside



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the EU, including those in vulnerable countries. The EU must take responsibility in this matter and do more to ensure that local markets outside the EU are not disrupted, but rather strengthened through development cooperation. According to these groups, this would also mean that the European agricultural sector should produce more for the local market.

European standards versus national customisation

Several parliamentary groups highlight the importance of a balance between European standards and goals and national customisation. For example, one of the groups wondered how much room the Commission intends to provide for national customisation instead of generic goals? Will attention also be paid to goal-oriented regulations instead of means-oriented regulations? To what extent does the Commission intend to set quantitative generic goals? The balance between European standards and national customisation is also important in the context of a level playing field. According to some groups, the degree of sustainability that a country already has must be taken into account in order to create a level playing field. Customisation can prevent countries that are lagging far behind in the field of sustainability from having the same goals imposed on them as countries that are very progressive, so that the difference between the countries remains equally great. One of the groups mentions the nitrates directive as an example in this context. A loss of derogation from a nitrates directive in a member state can lead to an increase in the use of fertilizers, which actually makes many sustainability goals even harder to achieve. According to this group, customisation is therefore important for achieving sustainability goals. According to one of the groups, a sustainable food system also means adapting agricultural practices to local conditions and determining which production methods can best be applied in which part of the EU. Different parts of the EU have different climates, which also means different agricultural practices. This includes differentiated fertilisation standards that are in line with scientific research, so that emissions are limited while yields are optimised.

One of the parliamentary groups suggests carrying out an economic impact assessment per member state when setting standards and targets.

Some parliamentary groups believe that the EU should draw up minimum directives. It should also be possible for national governments to accelerate where necessary. According to these groups, ambitious member states should not be limited by the EU directives. According to these groups, this also means that national governments must be able to impose additional standards on their farmers who want to receive subsidies within the framework of the CAP, and that member states must be able to spend a higher budget on greener agriculture than the budget established in the agreement.

Binding targets

Several parliamentary groups emphasise the importance of binding targets. These targets could help to establish and enforce local and regional transitions, procedures regarding permits and changes in the use of land. One of the parliamentary groups



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emphasises that making the food system more sustainable is only possible when all the actors in the chain have their own binding targets. It is pointless to oblige the producer to become more sustainable solely by using legislation and targets if the demand side - supermarkets and processing companies - does not also participate in improving sustainability. In other words, ensure that the market starts pulling instead of only having the government push.

Integrity

One of the parliamentary groups emphasises that making the food system more sustainable goes beyond organic farming alone. Much can also be achieved in the field of sustainability in conventional agriculture, e.g. by means of precision agriculture or landscape elements such as laid hedges. The European Commission is therefore asked to adopt a broader/more integrated approach than just a certain percentage of one type of agriculture. Furthermore, this group asks the Commission to look at integrity between agriculture and nature. The dividing line between agriculture and nature is not a border, but a grey area. The European Commission is therefore called upon to participate in/contribute ideas about constructions such as 'agricultural land' that create a judicial hybrid between nature and agriculture.

Feasibility

According to some groups, attention should be paid to practical feasibility when developing a sustainable EU food system. Goals and feasibility are sometimes at odds with each other. If we want to achieve a sustainable EU food system, goals and feasibility must be intertwined and not in conflict with each other. For example, there may be an ambition to limit the use of chemical crop protection products and there may also be an ambition to encourage non-inversion tillage. In practice, this means that green manure or catch crops may not be mechanically incorporated, so that applying glyphosate is the only option to prepare the land for subsequent cultivation. After all, the alternative crop protection products are too weak to incorporate the vigorous crop. In this way, ambitions and practice can be at odds with each other.

A just transition

For some parliamentary groups, the transition must be a just one. This means that additional measures must be taken to improve the rights, working conditions and social protection of workers in the sector, including migrant workers and seasonal workers. In addition, monitoring this by means of due diligence for imported products must be legally established.

Animal welfare

Animal welfare is also an important issue for some parliamentary groups. About 9 billion farm animals and 1.2 billion farmed fish live in the EU. The parliamentary groups call upon the Commission to set higher animal welfare requirements.

Crop protection products



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The parliamentary groups took note of the Commission's ambition to reduce the use of crop protection products. There is support for this transition, but the parliamentary groups still have some questions and comments about it. First of all, a few groups mention the importance of developing alternatives. In order to be able to make the transition to a sustainable EU food system, it is important to quickly introduce alternative means and techniques. However, these parliamentary groups also state that it is essential that the current resources remain available as long as the required resources are not yet developed or available. Existing resources can only be phased out when there is a proven effective and affordable alternative. Secondly, some parliamentary groups mention the importance of faster authorisation of products, especially for green crop protection products. How will the European Commission ensure that institutions, such as EFSA, will also have sufficient capacity - both financial and staff capacity - to be able to effectively meet these kinds of challenges?

Food security

One of the parliamentary groups has some questions and comments on the subject of food security, which is high on the agenda due to the war in Ukraine. The global population is growing and the need for high-quality, healthy food will continue to increase. Food cannot be taken for granted and the space for its production is decreasing as a result of housing construction, climate change, nature, the energy transition and industry. The subject of food security must remain high on the agenda. In addition, the cultivation method influences the yield. If we make the transition to more organic production, the yield loss will be higher than if we simply use crop protection products. This also affects food security.

In addition, some of the food that is suitable for human consumption is currently fed to livestock. There may be an opportunity to cooperate with the sector to develop an indicator for future management of the ratio between proteins in animal feed suitable for human consumption and proteins and residual flows that are only suitable for animal feed.

Common Agricultural Policy and funding for agriculture in the EU

Some parliamentary groups have questions and comments regarding the role of the CAP and funding for agriculture in the EU in making the agricultural sector more sustainable. According to these groups, a sustainable balance between climate and nature on the one hand and people's needs on the other is the only way to create socioeconomic security for people in the long term. According to these groups, this means that money should stop flowing to factory farming and other forms of intensive and monoculture agriculture with a high environmental and climate impact. Subsidies and other favours should benefit the transition to sustainable agriculture and not contribute to the continuation of the system that is currently the problem. These groups feel that much more should be done to pursue the extensification of agriculture, and the conservation and use of ecosystem services. This also means that stricter requirements must be imposed on the area of non-productive elements in the agricultural area. These groups argue that money for environmental measures should actually be used to make agriculture more



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sustainable. Among other things, that means that no economic criteria may be coupled to eco-regulations. It also means that no false environmental measures should be funded. For example, making factory farming more sustainable does not actually improve sustainability, but extensification does.

The Committee for Agriculture, Nature and Food Quality looks forward to your response and would very much appreciate your reply as soon as possible, but at the latest within three months of the date of this letter.

Yours sincerely,

Jaco Geurts

Chair of the Standing Committee for Agriculture, Nature and Food Quality