

Sustainable food system – setting up an EU framework

Fields marked with * are mandatory.

Introduction

Background

In the context of the “European Green Deal”, the European Commission adopted a comprehensive Farm to Fork Strategy[1], which recognises the inextricable links between healthy people, healthy societies and a healthy planet and aims to address comprehensively the challenges of sustainable food systems.

During the last decades the EU has largely been spared from crises threatening food security. However, the Russian invasion of Ukraine and the Covid-19 pandemic show that our food system can be exposed to such risks. The threats that the world is facing are severe and imminent, but so are the climate and biodiversity challenges that are here to stay.

Sustainability is fundamental to ensure long-term food security. Without a transition such as the one set out in the Farm to Fork Strategy, food security will be severely at risk in the long-term, with irreversible impacts globally. Natural resources, such as land, healthy soils, water and biodiversity, are key inputs into food production, and their growing scarcity in many parts of the world makes it imperative to use and manage them sustainably.

To drive the shift to a sustainable food system, the Farm to Fork Strategy has launched numerous actions, which should contribute to the reduction of greenhouse gas emissions, preservation of biodiversity and rural livelihoods, reduction of pesticides use and risk and pressures on water, soil and air quality, and better consumer information and animal welfare, while strengthening the competitiveness of the entire food sector and preserving food security.

The Strategy recognises that these individual and sector-specific actions can neither alone, nor in combination with each other fully ensure policy coherence at EU and national level, mainstream sustainability in all food-related policies and strengthen the resilience of food systems. For this reason, the Farm to Fork Strategy announced an initiative for a horizontal framework law, to accelerate and facilitate the transition to sustainability and ensure that

foods placed on the EU market increasingly become sustainable. Such an EU level intervention aims to establish new foundations for future food policies by introducing sustainability objectives and principles based on an integrated food system approach. This initiative will also include, among others, provisions for a sustainable food-labelling framework to empower consumers to make sustainable food choices, and it will explore new governance systems for a more active involvement of citizens and stakeholders at all levels.

Further background can be found in the [Inception Impact Assessment on the Sustainable EU food system Initiative](#), which was published by the Commission in 2021.

The aim of this public consultation is to gather opinions and evidence from the public and relevant stakeholders on the key issues the initiative aims to address, and on the main elements that may be used in the formulation of policy options to respond to those issues. At the same time, it should be noted that this questionnaire is not exhaustive in its scope. The policy design in the initiative for a Framework for a Sustainable EU Food System will draw on other processes which are ongoing in relation to specific aspects, such as for example the one on [Imports of agricultural and food products – applying EU health and environmental standards \(report\)](#) [2], or other initiatives mentioned on the [F2F website](#).

Moreover, more targeted consultations are also planned to take place during this year for specific stakeholder categories.

Who should fill the questionnaire and how to fill it?

The questionnaire for citizens is accessible in all official EU languages. As there may be delays in translating replies submitted in some languages, contributions in English are welcome, as they will help to process the survey more swiftly.

You can pause at any time and continue later. Once you have submitted your answers, you will be able to download a copy of your completed questionnaire. Questions marked with an asterisk (*) are compulsory. Those who are interested have the option to develop their responses in a more detailed manner.

Please note that in this questionnaire, we do not intend to obtain data relating to identifiable persons. Therefore, in case you will describe a particular experience or situation, please do it in a way that will not allow linking to a particular individual, whether it is you or somebody else.

Received contributions will be published on the Internet. It is important that you read the specific privacy statement attached to this consultation for information on how your personal data and contribution will be dealt with.

[1] Farm to Fork Strategy (europa.eu)

[2] The report, expected in June 2022, will assess the rationale and legal feasibility of applying EU health and environmental (including animal welfare) standards to imported agri-food products, and will identify the concrete initiatives to ensure better consistency in their application, in conformity with WTO rules. The report will not, however, propose any new initiatives.

Glossary/or explanation of terms used in the survey

The present questionnaire makes repeated reference to a number of concepts, for which it is useful to give indicative explanations upfront (i.e. working definitions for the purpose of this questionnaire) :

Food system: the food system is understood to include all relevant actors, resources in a broad sense, and activities relevant for the production and consumption of food and beverages and their associated wastes, and their impact on the economy, environment and society (including health)[1]. It considers the processes, infrastructures and interactions involved in feeding a population.

Food system actors are therefore a very broad category, but for practical purposes (including of this questionnaire), we consider the most relevant to be food/feed business operators including primary producers of food/feed, manufacturers, retailers, distributors as well as inputs providers, traders, consumers, financial actors, international traders, advisors and public authorities.

The food environment concept in this questionnaire must be understood to include physical and digital dimensions. The physical food environment can be defined as the physical, economic, political and socio-cultural contexts in which people engage with the food system to make their decisions about acquiring, preparing and consuming food. The digital food environment refers to the online settings through which flows of services and information that influence people's food and nutrition choices and behaviour are directed. They encompass a range of elements, including social media, digital health promotion interventions, digital food marketing and online food retail.[2]

Sustainable food system: An indicative definition of sustainable food system could be considered the following: "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 population 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." [3]

[1] JRC: Bock, A., Bontoux, L. and Rudkin, J., Concepts for a sustainable EU food system, EUR 30894 EN, Publications Office of the European Union, Luxembourg, 2022, ISBN 978-92-76-43727-7 (online), doi:10.2760/381319 (online), JRC126575.

[2] idem

[3] <https://www.sapea.info/wp-content/uploads/sustainable-food-system-report.pdf>

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
-

- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

s

* Surname

Martin

* Email (this won't be published)

smartin@clientearth.org

* Organisation name

255 character(s) maximum

ClientEarth AISBL

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

96645517357-19

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input checked="" type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |
| <input type="radio"/> Belize | <input type="radio"/> Ghana | <input type="radio"/> Montserrat | <input type="radio"/> Sri Lanka |
| <input type="radio"/> Benin | <input type="radio"/> Gibraltar | <input type="radio"/> Morocco | <input type="radio"/> Sudan |
| <input type="radio"/> Bermuda | <input type="radio"/> Greece | <input type="radio"/> Mozambique | <input type="radio"/> Suriname |
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Bhutan	Greenland	Myanmar/Burma	Svalbard and Jan Mayen
<input type="radio"/> Bolivia	<input type="radio"/> Grenada	<input type="radio"/> Namibia	<input type="radio"/> Sweden
<input type="radio"/> Bonaire Saint Eustatius and Saba	<input type="radio"/> Guadeloupe	<input type="radio"/> Nauru	<input type="radio"/> Switzerland
<input type="radio"/> Bosnia and Herzegovina	<input type="radio"/> Guam	<input type="radio"/> Nepal	<input type="radio"/> Syria
<input type="radio"/> Botswana	<input type="radio"/> Guatemala	<input type="radio"/> Netherlands	<input type="radio"/> Taiwan
<input type="radio"/> Bouvet Island	<input type="radio"/> Guernsey	<input type="radio"/> New Caledonia	<input type="radio"/> Tajikistan
<input type="radio"/> Brazil	<input type="radio"/> Guinea	<input type="radio"/> New Zealand	<input type="radio"/> Tanzania
<input type="radio"/> British Indian Ocean Territory	<input type="radio"/> Guinea-Bissau	<input type="radio"/> Nicaragua	<input type="radio"/> Thailand
<input type="radio"/> British Virgin Islands	<input type="radio"/> Guyana	<input type="radio"/> Niger	<input type="radio"/> The Gambia
<input type="radio"/> Brunei	<input type="radio"/> Haiti	<input type="radio"/> Nigeria	<input type="radio"/> Timor-Leste
<input type="radio"/> Bulgaria	<input type="radio"/> Heard Island and McDonald Islands	<input type="radio"/> Niue	<input type="radio"/> Togo
<input type="radio"/> Burkina Faso	<input type="radio"/> Honduras	<input type="radio"/> Norfolk Island	<input type="radio"/> Tokelau
<input type="radio"/> Burundi	<input type="radio"/> Hong Kong	<input type="radio"/> Northern Mariana Islands	<input type="radio"/> Tonga
<input type="radio"/> Cambodia	<input type="radio"/> Hungary	<input type="radio"/> North Korea	<input type="radio"/> Trinidad and Tobago
<input type="radio"/> Cameroon	<input type="radio"/> Iceland	<input type="radio"/> North Macedonia	<input type="radio"/> Tunisia
<input type="radio"/> Canada	<input type="radio"/> India	<input type="radio"/> Norway	<input type="radio"/> Turkey
<input type="radio"/> Cape Verde	<input type="radio"/> Indonesia	<input type="radio"/> Oman	<input type="radio"/> Turkmenistan
<input type="radio"/> Cayman Islands	<input type="radio"/> Iran	<input type="radio"/> Pakistan	<input type="radio"/> Turks and Caicos Islands
<input type="radio"/> Central African Republic	<input type="radio"/> Iraq	<input type="radio"/> Palau	<input type="radio"/> Tuvalu
<input type="radio"/> Chad	<input type="radio"/> Ireland	<input type="radio"/> Palestine	<input type="radio"/> Uganda
<input type="radio"/> Chile	<input type="radio"/> Isle of Man	<input type="radio"/> Panama	<input type="radio"/> Ukraine
<input type="radio"/> China	<input type="radio"/> Israel	<input type="radio"/> Papua New Guinea	<input type="radio"/> United Arab Emirates
<input type="radio"/> Christmas Island	<input type="radio"/> Italy	<input type="radio"/> Paraguay	<input type="radio"/> United Kingdom
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| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of

origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Questionnaire

1. To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know	Do not take position
* The existing EU food system is not sustainable in the long term	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There is a strong interplay and interdependence between the environmental, social (including health and nutrition) and economic dimensions of sustainability	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sustainability is fundamental for food security and for the resilience of the food system in the long term	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Consumers do not have sufficient information on the sustainability of foods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The current food system is not ready to meet future challenges, e. g. climate change, preserving natural resources and reversing biodiversity loss	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In order to be successful, food systems sustainability must be ensured both in the EU and at global level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. To foster the transition to sustainable food systems, how important (or impactful) are the actions of the actors listed below:

	Very important	Somewhat important	Neither important nor unimportant	Rather not important	Not important at all	Do not know	Do not take position
* Consumers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Primary producers of animal products (e.g. livestock farmers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fishers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Aquaculture producers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Primary producers of crops for food and feed (e.g. farmers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food/feed manufacturers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Traders (of food commodities or food/feed) importing from 3rd countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Traders (of food commodities or food/feed) exporting to 3rd countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Retailers of food/feed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Hospitality and food services, including restaurants and caterers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of plant protection products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of fertilizers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*							

Business operators active in the area of seeds and plant propagating material	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of food contact materials	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of veterinary medicinal products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in biotechnology relating to the food system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU institutions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National governments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regional governments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Cities, local authorities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Educational system	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-governmental organisations	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Investors, banks or financial institutions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Knowledge providers, advisors, research and innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other category: [please specify]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. How easy is it, in your assessment, for the following actors of the food system to make sustainable choices :

	Very difficult	Difficult	Relatively easy	Very easy	Do not know	Do not take position
* Consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Primary producers of animal products (e.g. livestock farmers)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fishers and aquaculture producers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Primary producers of crops for food and feed (e.g. farmers)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food/feed manufacturers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Traders (of agricultural commodities or food/feed) , including importers /exporters, wholesalers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Retailers of food/feed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Hospitality and food services, including restaurants and caterers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of plant protection products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of fertilizers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of seeds and plant propagating material	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of food contact materials	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the area of veterinary medicinal products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in biotechnology relating to the food system	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National governments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regional governments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Cities, local authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Educational system	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-governmental organisations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Investors, banks or financial institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Knowledge providers, advisors, research and innovation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other category: [please specify]	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: please justify your answer briefly

1000 character(s) maximum

The participation of all actors is necessary for a successful transition to sustainable food systems, but capacities to influence change differ. For Qs 2, 3, 7 & 10, we would highlight that actors at all levels of governance have a very important role to play in fostering this transition. However, the EU and its Member States are in the best position to take swift and far-reaching measures, whereas sub-national authorities face some more constraints and other international bodies are slower to achieve change. This is why we identified sub-national authorities as having less impact/leverage in Qs 2, 3, 7 & 10. The new EU legislative framework should require Member States to involve sub-national authorities in its implementation. The EU should act as a front-runner on the global stage and align its trade policy with the framework's objectives. Q3 should distinguish between small and large producers'/businesses' capacity as the choices are very easy for some of the latter.

4. To what extent do the following factors prevent food system actors from making sustainable choices in the production/processing/distribution/consumption of food products:

	To a high extent	To some extent	To no extent	Do not know	Do not take position
* Long-term/real costs and impacts of food are not reflected in the price and cost of food	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food system actors', including consumers', choices are based mainly on short-term costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Increasing competition on global markets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* No systematic integration of sustainability in the operations of food system actors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of common understanding of sustainability among food system actors in the EU single market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of common understanding among food system actors at global level in relation to sustainability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of transparency on/information about the sustainability of a product or its production /distribution process in the EU market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Lack of transparency/information about the sustainability of a product or its production process at global level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Marketing and advertising practices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Unbalance of market power in the food system, weakening the ability of certain actors (e.g. farmers) to invest in more sustainable practices.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Behavioural biases and habits of food system actors, including consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Food environments which predispose to unsustainable choices by consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The regulatory framework (lack of systematic sustainability objectives, definitions etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of targeted incentives to produce sustainable food (e.g. financial, R&I)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Insufficient availability of/accessibility to sustainable processes/products/services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Existence of multiple private standards	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of international standards on sustainability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of proper education, training, advisory services to assist food systems actors in the transition to sustainable food systems.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of investment in / knowledge/ access to innovation support measures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Insufficient research on food systems interdependencies, co-benefits and trade-offs of possible actions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other (please specify):	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify

Insufficient EU rules in favour of sustainable food procurement

Optional: If you wish, please briefly justify your answer

1000 character(s) maximum

The EU lacks a robust legislative framework with SMART objectives and targets based on sound evidence providing the direction of travel for all existing and upcoming food-related laws and policies (such as the CAP) towards an environmentally-sound, fair and healthy food system. The law must uphold the right to healthy and sustainable food, and target powerful actors such as large industrial fisheries, agri-food and seafood businesses, financial institutions, traders, retailers and public authorities. Food environments do not enable consumers to make sustainable, healthy choices. The lack of transparency about the sustainability of

a product or its production/distribution process in the EU/globally needs to be addressed through sound and controlled traceability, as well as robust and mandatory due diligence duties. Efforts should also address the lack of true-cost accounting of negative externalities in food prices and the marketing/advertising of unsustainable and unhealthy food.

* 5. In your direct experience, what are the most important obstacles in the transition to more sustainable practices?

4000 character(s) maximum

The CAP fails to adequately address the environmental and climate impacts of EU agriculture and its subsidies continue to support harmful practices. This was observed in studies and in reports from the European Court of Auditors showing e.g. the CAP 2014-2020 failed to organise the reduction of GHGs emissions and climate-related spending was overstated by at least €72 billion. The CAP 2023-2027 still lacks meaningful environmental and climate ambition and a robust governance framework, a situation that short-sighted derogations adopted for 2023 make worse. EU subsidies also tend to drive overfishing. Harmful subsidies for fisheries are allocated under the EMFAF and granted in the form of State Aid and other public aid, as well as tax exemption for fishing vessels under the Energy Taxation Directive. The absence of legally-binding and time-bound EU- and national-level targets is another significant obstacle. Targets must be introduced covering at least: the adequate contribution of the fisheries & agriculture sectors to GHG reductions, including through reduction of livestock numbers; targets for emissions from food operations contributing to air pollution; the Farm to Fork Strategy targets, especially those not covered in other legislative proposals; and targets to restore soil health.

In other areas, favourable legislation exists but lacks proper monitoring, implementation and enforcement. Seafood supply chains are severely affected by a general lack of transparency, especially when it comes to providing information about source fisheries. IUU fishing activities continue to directly affect law-abiding operators through unfair competition and can generate systemic abuses of human rights. The EU IUU Regulation partly addresses that, but more should be done by businesses internationally. The 2020 deadline to end overfishing in EU waters and by EU vessels – set out in the 2013 CFP Basic Regulation – has not been met; the landing obligation needs to be enforced and fish no longer discarded at sea; and the requirements of Article 17 of that Regulation better implemented to ensure that preferential access to fisheries quotas is granted to small-scale, low-impact fishers. The Water Framework Directive and “daughter” laws, e.g. the Nitrates Directive, are poorly implemented and enforced notably due to lack of alignment of CAP funds with water policy objectives (cf. ECA Special Report 20/2021).

The “responsible consumer choice” discourse that has dominated in recent decades led to policy interventions with insufficient focus on middle-of-the-chain actors, often limiting action to voluntary initiatives such as codes of conduct. The lack of true-cost accounting of negative externalities in food prices limits the purchase of sustainable and healthy products and accentuates inequalities. The absence of EU minimum mandatory criteria for sustainable food procurement hinders the potential of procurement to lead change. The new framework law must integrate an “enabling food environments” approach and alter the structural factors that drive unsustainable and unhealthy food choices by addressing the obstacles raised above and not limiting the EU’s intervention to labelling.

Overall, the EU lacks a coherent and effective regulatory approach to food sustainability. There is a lack of legally binding, overarching objectives and time-bound targets requiring existing laws (such as the CAP) and future initiatives to ensure a sustainable food system. This hinders the EU’s capacity to create coherence across EU and national laws. In defining its vision of a sustainable food system, the EU must recognise that food insecurity arises from barriers to access (not availability), organise the long-term resilience of the food system to operate within planetary boundaries, and uphold the right to healthy and sustainable food. It must also implement its commitment to include provisions on sustainable food systems in trade agreements (COM (2022) 409 fin).

6. To what extent do you consider that the following levels of government promote sustainable food systems in their policies?

	Not at all	Insufficiently	Sufficiently	Too much	Do not know
* EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regional	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Local	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Which level of government can best accelerate the transition to a sustainable food system?

(tick all that apply)

	No role	Limited role	Important role
* Global (international organisations)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* EU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* National	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Regional	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Local	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

8. To what extent do you agree with the following statements:

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know	Do not take position
* To encourage and accelerate the transition to a sustainable EU food system, it is necessary to establish EU-wide general objectives, principles and definitions relevant for the sustainability of the food system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* At EU and national level competent authorities should ensure that sustainability is mainstreamed in all food related policies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU trade policy, in particular, should be consistent with the objectives of the transition to a sustainable EU food system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators active in the food system should have mechanisms in place to ensure that operations/processes and/or products within the businesses under their control satisfy any sustainability-related requirements of EU law	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sustainability objectives for the EU food system should be translated into specific requirements by sector where not available	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A sustainability analysis in the form of a global analysis of the sustainability profile of a product or operations is needed to accelerate the transition to sustainable food systems forward	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Business operators of different sizes should have different levels of responsibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Best practices contributing to achieving a sustainable EU food system should be shared across the EU and nationally	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Optional: If you wish, please briefly justify your answer

1000 character(s) maximum

Adopting a new EU legislative framework featuring overarching objectives with SMART targets for the EU (cf. our answer to Q5) is essential to ensuring coherence across EU and national food laws and policies. The new law should trigger the alignment of laws and policies that would need to comply with its overarching objectives and targets, cross-referencing specific legislation where possible, e.g. the CAP. While food safety remains fundamental (cf. Q9), we invite the Commission to reflect on its meaning to cover nutrition and health (e.g. is food high in sugars or fats safe?) and environmental and climate impacts (i.e. is food safe when its production, processing, or disposal contribute to worsening the climate and nature crises?).

9. How important would you consider that the activity of a food system actor (to be considered as covering their internal operations /processes and/or products, within their businesses and under their control) should not significantly harm the following aspects:

	Very important	Important	Not very important	Not at all important	Do not know	Do not take position
* Climate change mitigation (e.g. reduction of greenhouse gas emission)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Climate change adaptation (e.g. improvement of irrigation efficiency)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The sustainable use and protection of land	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The sustainable use and protection of water and marine resources	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The transition to a circular economy (“reduce, reuse, recycle”)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Pollution prevention and control of air, water and soil	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Protection and restoration of biodiversity and ecosystems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Environmental protection (Minimise or improve all environmental aspects linked to the food system in a holistic way)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Prevention of slavery and forced labour	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fair and just working conditions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fair and just remuneration of primary producers (farmers and fishers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Prevention of child labour and protection of young people at work	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food safety and risks to human health	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Availability of food supplies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Affordability of sustainable food	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Accessibility of sustainable food	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cultural/culinary habits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Quality nutrition, to promote human health	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Animal welfare	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Animal and plant health	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Impact on developing countries	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other [please specify]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify

Human rights

10. At what level does the transition to sustainable food systems need to take place? (tick all that apply)

	Very important	Important	Not very important	Not at all important	Do not know	Do not take position
* Global	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* National	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regional	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Local	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 11. How do you see your role in the transition to sustainable food system?

1000 character(s) maximum

As an environmental law charity, ClientEarth uses the power of law to bring about systemic change that protects the Earth for - and with - its inhabitants. Our work consists of informing, implementing and enforcing the law, advising decision-makers on policy, engaging with businesses to drive responsible sourcing practices and training legal and judicial professionals. We have been active in EU environmental law-making for more than ten years. ClientEarth strives for sustainable food systems in the EU and globally, notably deploying our legal and policy expertise in the fields of agriculture, chemicals and plastics pollution, fisheries and sustainable seafoods, forests, trade, wildlife and the rule of law.

* 12. Are you involved in any platform/dialogue group/initiative that aims to contribute to sustainable food systems?

- Yes
- No

13. If yes: at what level is it active?

- International
- EU
- National
- Regional
- Local

Optional: Please elaborate on its activity and your role in it

1000 character(s) maximum

We are a member of the EU Food Policy Coalition where we co-lead a taskforce dedicated to a sustainable food system in the EU, collaborating closely with civil society organisations, think tanks, small farmers and consumers representatives. We are also the secretariat of a coalition of businesses working to improve sustainability in seafood supply chains, and a member of another coalition working on EU forest-risk commodity supply chains. We were appointed as a member of the new Advisory Group on Sustainable Food System and our Chemicals Project Lead is an alternate member on the management board of EFSA.

14. What role do you see for platforms/dialogue groups/initiatives in the transition to and governance of a sustainable food system?

2500 character(s) maximum

While a new legislative framework is necessary to accelerate the transition in a coherent manner across the bloc, coordinated multi-level action should guarantee the ownership, legitimacy and cross-cutting implementation of this initiative. Sub-national entities and citizens' initiatives should play a significant role in the food system transformation as they are closest to realities on the ground, and best practices have already emerged at the local level (e.g. food councils). Inclusive and balanced public participation processes should inform the design of the new law and related initiatives. Communications from the EU and national authorities should provide transparent and complete information on how inputs received during consultations have been taken into account in the final decision. The new law should feature robust monitoring and evaluation tools to keep track of progress in implementation and efficiently address potential delays in achieving the law's overarching objectives and targets. It should identify science-based indicators and benchmarks and regulate the collection of relevant, comprehensive and standardised national and regional data. Public and private enforcement and accountability mechanisms should be carefully designed and uphold the environmental procedural rights of the Aarhus Convention as well as consumers' rights. Specific attention should be paid to integrating judicial remedies into the legislative proposal, as these empower citizens and civil society to defend the correct implementation of the EU acquis. To have a real deterrent effect, rules on sanctions for non-compliance must be sufficiently detailed and set at sufficiently high level. Adopting a fundamental rights approach in the framework law will help create a common vision for a sustainable food system in the EU, thereby identifying people as its foremost beneficiaries. Access to healthy and sustainable food is linked with human dignity, the integrity of the person and the protection of human health. These are rights directly protected by the EU Charter of Fundamental Rights (Articles 1, 2, 3 and 35). Next to environmental procedural rights and consumers' rights, the law should uphold the right to healthy and sustainable food. The latter has been recognised by the UN Special Rapporteur on human rights and environment as one of the substantive elements of the right to a safe, clean, healthy and sustainable environment, and should be enshrined in the law's objectives.

For the purpose of questions 15, 16 and 17 of this questionnaire, sustainability information to consumers (or sustainability labelling) covers, as specified in the Farm to Fork Strategy, information on the nutritional, climate/environmental and social aspects of food products. Social aspects include amongst others animal welfare and socio-economic aspects.

*

15. On which of the below aspects of sustainability, should consumers receive information to empower them to make sustainable food choices

(please select and rank in order of importance, the first being the most important and the last being the less important)

Use drag&drop or the up/down buttons to change the order or [accept the initial order](#).

⋮ Environment
⋮ Climate
⋮ Animal welfare
⋮ Nutrition
⋮ Fair and just working conditions
⋮ Fair and just remuneration of producers
⋮ Other aspects (please specify)

If "other aspects", please specify

16. To what extent do you agree with the following statements:

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know	Do not take position
* Consumers pay more and more attention to the sustainability of the food they buy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sustainability information currently provided to consumers on food products is reliable	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sustainability information currently provided to consumers on food products is clear and easy to understand	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sustainability information currently provided on food products allows consumers to choose sustainable food products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The multiplicity of sustainability labels on food products are confusing for consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Providing information to consumers about the sustainability of the food they buy is a useful tool and it will accelerate the transition to a sustainable food system	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Reliable and evidence-based sustainability labelling of food products would also help incentivising operators to supply more sustainable products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food businesses should be subject to the same rules on sustainability information to consumers across the entire EU	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A dedicated sustainability label which allows comparing the sustainability of food products would help consumers to make sustainable food choices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 17. If an EU sustainability label was established:

(please select only one answer)

- Such a label should be a voluntary label identifying only sustainable food products
- Such a label should be a voluntary label- identifying sustainable and non-sustainable food products
- Such a label should be a mandatory label informing on the sustainability of all EU food products
- Such a label should be a mandatory label informing on the sustainability of all EU and imported food products
- A EU sustainability label is not necessary / desirable
- Don't know
- Other (please specify)

If "other", please specify:

The establishment of an EU sustainability label for food raises important concerns that must be carefully considered and addressed before a decision is adopted. An EU sustainability label for food would necessarily translate a certain vision of food sustainability and be value-loaded. In addition to selecting a science-based methodology capable of addressing the limitations of other methodologies currently in use, e. g. the Product Environmental Footprint (PEF), the Commission would have to ensure the full transparency of, and balanced representation in the process of establishing the label. We note the risk for the discussion to be sector-driven and result in important trade-offs and weighing, thereby potentially channelling misleading information to consumers on the environmental sustainability of food products. The Commission should also pay specific attention to the reoccurring issue of equal opportunities, as in practice an EU label could be inaccessible to small farmers, fishers and businesses and favour industrial players.

We also note that in 2016, an attempt was made to establish a full EU ecolabel for fisheries and aquaculture products. The Commission subsequently published a feasibility report which find no evidence of market failure or regulatory gaps in eco-labelling, whilst concluding that the ones existing in the fisheries and aquaculture sector were not different than from those in other sectors such as wood and palm oil. The parallel in-depth study commissioned by DG MARE concluded that this option “represented a high cost option with few net benefits identified. It would require significant effort in the development, implementation and promotion of the label. The development process would be lengthy with the need to agree standards for fisheries and for aquaculture, scheme structure, management and administration within an EU institution. Being voluntary label it is not clear that an EU ecolabel would result in cost savings amongst stakeholders in the short to medium term by replacing other labels that are now well established”. (MRAG, 2016. Feasibility Report on options for an EU ecolabel scheme for fishery and aquaculture products)

The risks identified in 2016 by the Commission and the ones we described above explain our current reluctance to position ourselves in favour or against the establishment of an EU sustainability label without further description of the options considered. We consider that the Commission should in priority deploy an array of other initiatives under the new legislative framework that can more effectively address the obstacles identified in Question 5 and the need to create enabling food environments.

* 18. To what extent should schools and public institutions consider sustainability when purchasing food?

- None
- Limited
- Moderate
- Great
- Do not know
- No opinion

19. If “moderate” or “great”, how important do you think such an action would be for the transition to sustainable food system..?

- Very important/impactful
- Moderately important/impactful
- Neutral
- Only with a limited importance impact
- Not important/impactful at all
- I do not know
- I do not take position

20. In relation to **public procurement of food served in schools and public institutions**, to what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know	Do not take position
* The meals should be enjoyable and tasty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The meals should be accessible to all, at an affordable price	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Plant based alternatives should be offered more frequently	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food produced locally should be offered more frequently	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Nutritionally well balanced meals (e.g. alternatives lower in sugars and fats) should be offered more frequently	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* More fruits and vegetables should be offered	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Food produced from traditional and locally adapted varieties, in particular for fruit and vegetables, should be offered more frequently	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Production of food of animal origin should respect high animal welfare standards	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Organic meals/ingredients should be offered more frequently	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The social impact of the meals offered (e.g. human rights , workers rights) should be taken into account in procurement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The environmental impact of the meals offered should be taken into account in procurement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The nutritional quality of meals offered should be taken into account in procurement	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Food services companies that respect social values beyond the sectoral collective agreements should be favoured in procurement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The school has an educational role to play concerning the sustainability of food	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Information about the nutritional composition, of the meals served should be provided in the canteens of public institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information about the environmental impact of the meals served should be provided in the canteens of public institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information about the social impact of the meals served should be provided in the canteens of public institutions.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information about the animal welfare standards respected should be provided in the canteens of public institutions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

21. To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know	Do not take position
* Food composition targets for sugars, salt, and saturated fat for all food categories should be set	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Targets for added sugars, salt and saturated fat for processed and ultra-processed foods and meals should be set	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* When designing policies that impact food prices (such as subsidy schemes and taxation), competent authorities should consider how these policies can encourage a higher consumption of whole grain cereals, vegetables, fruits, legumes and nuts, and a lower consumption of red meat and foods high in sugars, salt, and saturated fat	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

22. To what extent do you agree with the following statements?

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree	Do not know	Do not take position
* The marketing, advertising and sales promotion, including online, of foods high in saturated fat, salt or sugars to children should be restricted	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Marketing techniques should be restricted unless the products they relate to are of high nutritional standard (e.g. low in saturated fat, salt or sugars)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sponsorship activities that result in advertising during big events (e.g. sports events) should be restricted for products high in saturated fat, salt or sugars	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The merchandising of foods (i.e. the way food products are presented in retail outlets) should promote healthier food choices	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. What incentives would be most effective in stimulating sustainable production/processing /distribution/consumption methods and techniques?

1000 character(s) maximum

Market failures and power imbalances in the value chain should be addressed: public subsidies should only sustain small or medium farmers, fishers and businesses demonstrating environmentally friendly and fair practices; food producers should enjoy better contractual protection; environmental and human rights due diligence requirements should apply across the whole value chain, and coherence with the corporate sustainability due diligence directive and deforestation-free products regulation proposals should be ensured. The EU should favour shaping enabling food environments by mainstreaming the procurement of sustainable food; ensuring negative environmental and climate externalities are reflected in food prices; ensuring improved and mandatory traceability; regulating the marketing, advertising and promotion of unhealthy and unsustainable food products; adapting trade rules and agreements; and regulating and creating incentives in the financial market.

* 24. Do food system actors have sufficient knowledge and skills for the transition to sustainable food systems?

- Yes
- No
- Do not know
- I do not take position

* 25. Are there food system actors that are better prepared for the transition than others?

- Yes
- No
- Do not know
- I do not take position

Optional: Please elaborate

500 character(s) maximum

Thank you very much for taking the time to respond to this questionnaire!

Document upload

Please feel free to upload a concise document, such as a position paper.

The uploaded document will be published alongside your response to the questionnaire which is the essential input to this public consultation. The document is optional and serves as additional background reading to better understand your position.

Please upload your file

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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