

RFD

The initial situation

According to the European Commission: "The Commission calls on all citizens and stakeholders to participate in a broad public debate to formulate sustainable food policies, including through assemblies at national, regional and local level".

We want to participate in this broad debate

A) Farmers as the main cause of climate change and environmental degradation

A few sentences from the strategy, which some citizens probably see as such, but which are problematic for a farmer:

...In addition, the production, processing, retailing, packaging and transport of food play a significant role in the pollution of air, soil and water and in greenhouse gas emissions, as well as having a profound impact on biodiversity. Although the EU's transition to sustainable food systems has been initiated in many areas, these systems are still one of the main causes of climate change and environmental degradation. There is an urgent need to reduce dependency on pesticides and antimicrobials, reduce excessive use of fertilisers, intensify organic farming, improve animal welfare and reverse biodiversity loss.

The production, processing, etc. of food does indeed have an impact, which is perfectly logical. Last but not least, they are the result, impact or consequence of national and EU-wide legal rules and regulations to which the vast majority of all those involved in the agricultural sector adhere and have adhered. To identify food production as the main cause of climate change and environmental degradation is a completely unjustifiable slap in the face of anyone who produces food. How significant it actually is in Europe compared to other factors has been studied often enough.

Throughout the study, the EU Commission does not give concrete facts and figures, but uses the familiar and common vocabulary to put farmers in the dock. Food production always has an impact on air, soil, water and biodiversity.

This conflict of objectives cannot be resolved.

B) Food supply chain and food prices

The EU Commission writes about this:

The EU aims to reduce the environmental and climatic footprint of the Union's food system and strengthen its resilience, to ensure food security in the face of climate change and biodiversity loss, and to lead the global shift towards competitive sustainability from the farm to the table and seize the new opportunities that arise.

Two approaches to achieving this will be presented here. The Commission intends to

1. ensure food security, nutrition and public health - to this end, everyone must have access to sufficient, nutritious and sustainable food, which meets high standards of safety and quality, plant health, animal health and animal welfare, while respecting dietary needs and habits

and the Commission intends to

2. keep food prices affordable while generating a fairer economic return in the supply chain, so that ultimately the most sustainable food is also the most affordable, promoting the competitiveness of the EU supply sector, supporting fair trade, creating new business opportunities while preserving the integrity of the internal market and protecting health and safety at work

Point 1 is self-evident. The factors are already met today.

On point 2, farmers have long been expecting a "fair economic return in the supply chain". They have been supplying cheap food for decades.

The EU Commission does not specify in the entire study how it intends to achieve this in concrete terms. The terms "promote", "support", "safeguard" and "protect" are so arbitrary that nobody can do anything with them. And opinions also differ widely about what "fair trade" is. This applies both to the internal market and, above all, to trading conditions with third countries. The conflict of objectives between secure supply, sustainable production and cheap prices is made abundantly clear here.

C) Ensuring sustainable food production

The EU Commission writes about this:

Farmers, fishermen and aquaculture producers must more rapidly transform their production methods and fully exploit nature-based, technological, digital and space-based solutions to improve climate and environmental outcomes, increase climate resilience and reduce and optimise the use of inputs (e.g. pesticides, fertilisers).

If the Commission is really serious about this, many farms in the EU will exit food production in the short and medium term. For digital and space-based solutions (please specify!), these farms lack the financial and, in some cases, the technical possibilities. The extent to which digitisation will make it possible to reduce operating resources is based on assumptions and expectations rather than hard facts. It is also questionable whether the speed of conversion demanded by agriculture is made possible and desired by the technology providers. Statements of a minister "There is no need for 5G at every milk churn" cast doubt on this.

The EU Commission names demands, for the fulfilment of which it names measures that require high investments and whose solutions partly do not yet exist. This is dubious. Wanting to maintain small farms, but at the same time demanding high investments from them, is a conflict of objectives.

D) Recycling management as potential

The EU Commission writes about this:

The biobased circular economy still holds a largely unused potential for farmers and their cooperatives. For example, advanced biorefineries producing organic fertilisers, protein feed, bioenergy and biochemicals offer opportunities for the transition to a climate-neutral European economy and the creation of new jobs in primary production. Farmers should seize the opportunity to reduce methane emissions from livestock by expanding the production of energy from renewable sources and investing in digesters for biogas production from agricultural waste and residues such as manure. Farms also have the potential to produce biogas from other waste and residues, such as food

and drink, wastewater, sewage and municipal waste. Farms and barns are often well suited to the installation of solar panels, so such investments should be prioritised in future CAP strategic plans.

The EU Commission fails to recognise how many farmers have already invested in the above-mentioned fields. Vocabulary such as "farmers should seize the opportunity" or "farms have the potential" fails to recognise that farmers are self-employed entrepreneurs and run their businesses according to economic criteria. The experiences of agriculture with a politically desired and promoted use of renewable resources ("oil sheikhs of tomorrow") and a later condemnation of exactly this use are still present. A small aspect on the side: solar panels and solar thermal energy are forbidden on listed farms in Germany.

If the EU wants to promote the above-mentioned branches of industry more strongly in future and changes the framework conditions, a stronger commitment is likely. Otherwise there is a conflict of objectives.

E) Reduce pesticides by 50%.

What does the EU Commission write?

The use of chemical pesticides in agriculture contributes to the pollution of soil, water and air and the loss of biodiversity and can harm non-target plants, insects, birds, mammals and amphibians. The Commission has already established a harmonised risk indicator to quantify progress in reducing the risks associated with pesticides. According to this indicator, these risks have been reduced by 20% over the last five years. The Commission will take further action to reduce the use and risk from chemical pesticides by 50% overall and 50% for higher-risk pesticides by 2030.

Here are some questions: what is to be achieved? What exactly is meant by 'chemical pesticides'? Also copper? 50% reduction of what? From the active ingredient, from the product, from sales? Which year is the starting point? Why is a distinction made between chemical pesticides and pesticides with a higher risk? Why was 50% chosen as the measure? Why not 30% or 80%? Why not a general ban? Is the use of "chemicals" generally negative or only when it comes to agriculture? Are the chemical substances used to protect plants and animals - for example from viruses - now linguistically deliberately negatively connotated "pesticides" or are they pesticides and veterinary medicines after all? Is this understandable at a time when the whole world is looking for new chemical substances to protect people from viruses? It also remains an open question to what extent Europe wants to counteract its almost total dependence on the Asian region in the case of chemical active substances, especially in the case of pharmaceuticals and plant protection products.

This chapter is illogical in itself. It remains completely unclear what is to be achieved in concrete terms. How is success to be measured? Where is the reference value, the reference year? A complete ban on all plant protection products, including biological preparations, would be consistent. After all, these too have a negative impact on biological diversity through chemical processes. The conflict of objectives can only be resolved by a complete ban. But then a new conflict of objectives arises: the politically and socially desired supply of regional products to the own population cannot be guaranteed.

F) Reduce nutrient losses by 50%.

The Commission will comment on this:

Due to excessive inputs, and given that not all nutrients used in agriculture are actually absorbed by plants, there is an excess of nutrients (in particular nitrogen and phosphorus) in the environment, which is another major source of air, soil and water pollution and climate change. This has reduced biodiversity in rivers, lakes, wetlands and seas. The Commission will take action to reduce nutrient losses by at least 50% while maintaining soil fertility. This will reduce the use of fertilisers by at least 20% by 2030.

A very ambitious target: to reduce nutrient losses by at least 50% while maintaining soil fertility. There is no answer as to how this is to be achieved. At the same time, however, agriculture should store CO₂. That is definitely a conflict of objectives.

G) At least 25% organic farming by 2030

What does the Commission say?

The market for organic food will continue to grow and organic farming must be further promoted. It has a positive impact on biodiversity, creates jobs and offers attractive conditions for young farmers ...

... In addition to CAP measures such as organic farming schemes, investments and advisory services, and measures under the Common Fisheries Policy (CFP), the Commission will present an Action Plan for Organic Farming. This will help Member States to boost both supply and demand for organic products. Consumer confidence and demand will be stimulated through promotion campaigns and green public procurement. This approach will contribute to the objective of organic farming of at least 25% of the EU's agricultural land by 2030 and the significant development of organic aquaculture.

The approach of promoting sales of organic food is the right one. If sales (at reasonable prices) work, production will follow. It must be ensured, however, that no organic products from abroad with lower standards are given preferential treatment by the trade and torpedo development in many European countries. This is exactly what is happening at the moment.

H) Fair income for farmers

What does the Commission say?

The new CAP, proposed by the Commission in June 2018, aims to help farmers improve their environmental and climate performance by shifting the focus to results, better use of data and analysis, improved mandatory environmental standards, new voluntary measures and a stronger focus on investment in environmentally friendly and digital technologies and practices. It should also guarantee an adequate income to feed their families and to survive crises of all kinds.

There is no better way to express the wish of many farmers "It should also guarantee an adequate income to feed their families and to survive crises of any kind". In any case, the old CAP did not make it. Once again, there is no talk of an adequate participation of agriculture in the increase of general prosperity. Instead, salvation is being sought in digitalisation, which small and medium-sized farms in particular can no longer afford. For Eastern European micro-enterprises this is the end of the road.

I) Competitiveness and food security

What does the Commission say?

Climate change and biodiversity loss are acute and permanent threats to food security and livelihoods. In the context of the present strategy, the Commission will continue to pay close attention to food security and the competitiveness of farmers and food operators.

"Continued close attention". What a statement!!! Such platitudes do not radiate the will to implement and enforce. Means and measures to implement them are not even mentioned. There is also little information about the unconditional European will to use new scientific findings in research and technology. And not a word about Crispr CAS.

J) Waste of food

The Commission also addresses this issue in a very short chapter:

The Commission has committed itself to halving per capita food waste at retail and consumer level by 2030 (SDG target no. 12.3). Based on the new EU methodology for quantifying food waste and the data expected from Member States for 2022, it will set a reference value and propose legally binding targets for reducing food waste across the EU.

"Set a reference value and propose targets." How to reduce food waste is not included in the strategy.

K) Food imports

What does the Commission say?

Imported food must continue to comply with the relevant EU rules and standards. The Commission will take environmental aspects into account when considering requests for import tolerances for pesticide active substances that are no longer authorised in the EU, while respecting WTO standards and commitments. To address the global threat of antimicrobial resistance, products of animal origin imported into the EU must meet strict requirements on the use of antibiotics, in line with the recently adopted regulation on veterinary medicinal products.

These are self-evident. The right thing to do would be to only allow the import of foodstuffs that have been produced under the same legal provisions that apply in Europe. This is not the case today.

The impression arises that agriculture should accept without complaint that food with lower standards should be imported from countries outside Europe, so that other, export-oriented economic sectors, such as the food industry, can continue to be able to compete on the market.