



FOOD FEDERATION
Germany

Environmentally friendly, healthy, socially
and economically viable – sustainable
food today and in the future



Food Federation Germany's position on European Commission's
"Farm to Fork Strategy"

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On 20 May 2020, the European Commission presented its "Farm to Fork Strategy" for a fair, healthy and environmentally friendly food system, as part of the "Green Deal". Representing the entire food value chain "from farm to fork" in Germany, Food Federation Germany supports the overarching objective of the Commission strategy and agrees that a sustainable, resource-saving production of food is key, as well as ensuring the industry's social responsibility for people, animals and the environment. With a view to planetary boundaries and the declining availability of raw materials, the greatest challenge is ensuring that the world's growing population is reliably supplied with safe, high-quality food. This can only be achieved by keeping sustainability at the forefront and implementing it in an environmentally friendly, healthy, social and economic way.

What we do already:

We, the food value chain in Germany, are engaged in numerous measures and initiatives that we continuously expand and extend, in order to guarantee more and more sustainable production, refinement, processing and marketing of food. Our solutions include everything from supply chain and raw material management to energy efficiency, waste avoidance in production and joint social engagement initiatives with our customers. We have already made a significant contribution to designing more sustainable food systems through the reuse, recycling and collection of packaging materials, the reduction of food losses, soil protection, the use of plant-based protein sources and the constant further development of our product range.

What we will be continuing to work on:

WE ACT ENVIRONMENTALLY FRIENDLY

- We are committed to reducing the consumption of energy, water and raw materials as well as to optimising transport and logistics processes.
- We invest in agricultural measures which capture CO2.
- We reduce avoidable food waste at all stages of the food chain.
- We strive to optimise the use, reuse, recycling and collection of packaging materials and to promote innovations in this area.

WE ACT TO PROMOTE HEALTH

- We offer a variety of safe and high-quality foodstuffs (170,000 products) to meet every individual lifestyle and need.
- We optimise the nutrient content of our products and provide information about ingredients and nutritional values.
- We use alternative protein sources and new technologies.

WE ACT SOCIALLY

- We uphold human rights, labour standards and fair wages along the supply chain. We take the United Nations Guiding Principles on Business and Human Rights as our benchmark.
- We assume responsibility for global supply chains, jobs and value creation.
- We are working on improved husbandry conditions, because the well-being and appropriate handling of farm animals such as pigs, cattle or poultry are very important to us.

WE ACT ECONOMICALLY VIABLE

- We strive for stable growth in order to ensure investment in sustainability as well as research and development and to maintain and create jobs.
- We are orientated towards the wishes of consumers and rely on voluntary actions so as not to endanger free competition.

What we expect from policy makers when implementing the “Farm to Fork Strategy”:

TAKE INTO ACCOUNT THE CONSEQUENCES OF THE CORONAVIRUS PANDEMIC

The Commission’s strategy was conceived before the coronavirus crisis. Thus, its effects, which are still not fully foreseeable, have not been taken into account. Given that the coronavirus crisis has had a huge financial effect on the food industry and that small- and medium-sized businesses in particular need to ensure economic stability in the coming months, policy makers will now have to decide on the necessary prioritisation and feasibility of individual aspects of the strategy. It has to be examined what is most important and achievable, in view of the recovery from the coronavirus crisis and, above all, considering where joint European solutions can be achieved that are supported by all Member States. Overall, it will therefore be important to reconcile the recovery from the coronavirus crisis with the sustainability goals set. Important instruments in achieving these goals should include digitisation and the orientation of funding programmes towards sustainability.

MAKE VALID IMPACT ASSESSMENTS AND „SUSTAINABILITY TESTS“ A PREREQUISITE FOR ALL MEASURES

In addition to the necessity of including consequences of the coronavirus crisis, the “Farm to Fork Strategy lacks a comprehensive impact assessment (IA) of all proposed measures and approaches in relation to the objectives pursued. All knowledge bases and data mentioned in the strategy which serve as the basis for specific regulatory objectives, such as reducing the use of crop protection products, must therefore be disclosed. This is the only way to see where further clarification and research is required. In addition, new “sustainability tests” must be established to show which measures really lead to improved sustainability in food production and consumption.

CREATE SCIENTIFIC EVIDENCE

All regulatory or other initiatives within the framework of the new sustainability strategy must be based on reliable scientific assessment and evidence. This is a fundamental obligation from Regulation (EC) No. 178/2002, which lays down the general principles and requirements of food law and which was the centrepiece of the „Farm to Fork Strategy”, contained in the White Paper on Food Safety published in 2000. Objective and scientifically sound criteria are essential to resolving conflicts between the existing goals and ensuring the appropriate prioritisation of the various sustainability goals and their implementation. Example: Before the EU environmental footprint (PEF) can form a basis for uniform measurements in the future, its applicability for all products must be further researched.

FOCUS ON SUPPLY SECURITY AND FOOD SAFETY

The COVID-19 pandemic has shown that securing food supplies and food safety in times of crisis is essential. Thanks to the tireless efforts of industry employees and despite major challenges such as closed borders and changing business processes due to new safety and hygiene concepts, the food supply chain in Europe functioned almost seamlessly. All new sustainability approaches should include a focus on supply security and food safety.

PROTECT AND PROMOTE THE SINGLE MARKET

Ensuring the functioning of the Single Market must remain the top priority. Hence, any new country of origin labelling requirements must be checked to see whether they are compatible with this goal, and what they can actually contribute towards the establishment of a sustainable food system. Many Member State regulations of recent years have been primarily protectionist in function and therefore cannot be used as a model for European approaches.

CREATE INCENTIVES FOR INVESTMENT IN RESEARCH AND DEVELOPMENT

Incentives for investment as well as research and development are important core elements on the common path to more sustainable food systems compatible with free-market principles and based on the goals of the 2030 Agenda. Ambitious sustainability goals can only be achieved if they go hand-in-hand with a strengthening of the competitiveness and innovative capacity of companies in the European Union at all levels, from agriculture, traditional crafts, industry and retail to all suppliers and other economic sectors affected. This, perhaps the greatest challenge for Europe's new sustainability strategy, must therefore be at the centre of all considerations, regardless of the individual sustainability goal in question.

DEMAND DETERMINES SUPPLY – COMPANIES MUST RETAIN RESPONSIBILITY FOR THEIR RECIPES

The food industry has always focused on the development of innovative products, thus gearing itself towards the needs of consumers. The development, production and marketing of food is the core competence of companies in the whole food sector. Measures designed to channel consumption, such as taxes or bans on products and advertising, are patronising to consumers and involve government interference in the freedom of companies to compete and design their own recipes and, as such, are not effective.

AGREE ON UNIFORM, VOLUNTARY FRONT OF PACK NUTRITION LABELLING

The Commission's efforts should focus on uniform European approaches to additional voluntary front-of-food-pack nutrition labelling. Food businesses support helping consumers to make informed purchase decisions through expanded nutrition labelling. Now is the time to agree on a "European" approach.

EMPOWER CONSUMERS TO CONSUME SUSTAINABLY

In order for consumers to be able to make conscious and more sustainable purchasing decisions, they need sufficient information and understanding to be able to classify them. In addition to the extensive mandatory labelling, voluntary information is available to consumers, for example on the packaging, in digital format or via governmental and private seals of approval. Regarding additional mandatory information, it must be guaranteed that it is meaningful, understandable, proportionate and feasible. The enabling of more sustainable consumption must be promoted primarily through consumer education.

The German food sector

The German food sector, which is predominantly composed of medium-sized companies, ensures a diverse offering of approximately 170,000 foodstuffs offered at affordable prices. It provides jobs for 12 percent of the workforce and invests continuously in the future of the labour market in Germany. In total, over 5 million people in 700,000 companies ensure that over 82 million citizens in Germany and a large number of people worldwide can enjoy safe, high quality food and drink every day. The German food sector covers the entire chain, from production, refinement and processing right through to marketing to the end consumer.

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