

EFAD response to the Ad Hoc Advisory Group on the Farm-to-Fork Strategy

3 July 2020

Dear Ms Darago

Thank you for offering the European Federation of the Associations of Dietitians (EFAD) the opportunity to participate in the Ad Hoc Advisory Group meeting on the Farm-to-Fork Strategy. Manuel Moñino, lead of the European Specialist Dietetic Network (ESDN) for Public Health dietitians attended on behalf of EFAD, but due to the number of attendees and interventions he did not have the opportunity to comment on the issues discussed. However, we are delighted that all attendees have been given the opportunity to send comments later on, and we are doing so with this letter.

For EFAD it is a pleasure to be able to participate in the development and implementation of this strategy for a healthier and more sustainable EU, which seeks to overcome current barriers using integrative and holistic vision to implement the multiple policies that will have a great impact in our society.

Without a doubt, we are eager to live in a Europe like the one that is being promoted by this strategy and we openly support the initiative.

You can count on EFAD's support and willingness to help to overcome the barriers that may arise as the Strategy is implemented. We are confident we will be able to help bring about success by drawing on the unique abilities and competences in nutrition and dietetics of the European dietetic workforce to facilitate the transition from current consumption patterns to other healthier, fairer and more sustainable patterns of consumption. This can be done by improving food environments, reducing losses and food waste, improving consumer protection and improving citizens' literacy in food, health and sustainability.

Public Health Dietitians promote sustainable and balanced healthy diets whilst upholding the ethos of 'first do no harm' and recognizing the importance of the contribution of a healthy diet to healthy societies and a healthy planet. This role is particularly important with respect to enhancing nutritional knowledge, health and food literacy for all people across the lifespan, recognizing the wider social determinants of health, while leaving no-one behind.

For EFAD's part, we wish to draw attention to the lines of action which the Farm to Fork policy shares with policies that EFAD has been working and advocating for:

- The EFAD White Paper on [Sustainable Health throughout the life span: Nutrition as a Smart Investment for Europe](#), calls for healthy and sustainable food systems. The data show that dietetic interventions demonstrate statistically- and clinically-significant impacts on health outcomes. The purpose of this paper is to illustrate how the prevalence of Non-Communicable Diseases in Europe, and the resulting societal and economic consequences, can be significantly reduced by dietitians due to their unique roles and documented impact. In addition, there are described lines of action to lead Europe toward more healthy and sustainable diets and food systems. Particularly, we strongly recommend a directive encouraging European national and regional

governments to incorporate sustainability as a central pillar of their Food Based Dietary Guidelines, in collaboration with national dietetic associations¹, health services and civil society. Concerns for the environmental impact should be used as a motivator for the transition to healthy and sustainable eating habits, making citizens responsible for their actions, through enhanced food literacy. Motivation should be created for the consumer to adhere to this lifestyle, through knowledge of the environmental impact that food waste causes, as well as making healthy options more affordable at an economic level.

- EFAD have been actively advocating for a transparent, harmonized, colour-coded, evidence-based and non-misleading Front Of Pack nutrition labeling scheme, published in the EFAD position paper that was mentioned in the [EC report on front-of-package nutrition labelling May 2020](#). We will continue to do so.
- Last year EFAD members unanimously adopted the [EFAD Policy Paper on Nutrient Profiling 2018](#) . We are delighted to learn that our recommendation is totally aligned with that of the Strategy, which states that “the setting of nutrient profiles is still pertinent and necessary to protect the consumer”. We are convinced that our work on nutrient profiling will be really helpful when undertaking the important task of establishing fairer, healthier and more sustainable diet and food systems.
- While we are totally in agreement with the intention of the Commission to request EFSA to launch a proposal for Nutritional Profiles by 2022, we believe that proposing the end of 2021 to establish clear limits on key nutrients to facilitate reformulation, could lead to a confusing crossover between food industry and consumers. The two proposals should go hand in hand, so that the limits of the key nutrients are similar, even the same, in both systems, so food industry can establish its reformulation goals aligned with public health aims.
- As regards targets, we strongly believe that whilst it is clearly stated that agriculture contributes only 10.3% of the EUs GHG emissions, there is a lot of emphasis on what agriculture still needs to do, while recognizing what has already been achieved. On the other hand, while it is stated that food manufacturing, processing, retailing, packaging and transportation is acknowledged as contributing to GHGs, the targets for these areas of the food chain are much less focused in terms of objectives and aims. We also find that section 2.5 is very brief and does not fully highlight the contribution of food losses and waste to GHGs. Doing so could help to redress the balance in terms of food and nutrition security.
- Food losses and waste is an issue of concern in many settings (e.g. food services, nursing homes, public health, hospitals, schools, prisons etc.). Dietitians working in these settings can be key actors and leaders. Food waste occurs closer to the consumer in developed regions such as the European Union. Thus, we are glad the Strategy focuses on improving harvesting techniques in terms of production, handling, storage and processing technologies; on changing food (best by, use before, ecolabel, environmental impact, origin etc.) labels and

¹ A full list of European National Dietetic Associations is available on <http://www.efad.org/en-us/about-efad/membership/>

on reducing food portion sizes. Dietitians are already actively involved in sign-posting people to local and seasonal produce, which helps both the local economy and reduces waste, packaging and food miles.

We also request investment in lines of action to give new use to products that would otherwise be considered “waste” (by-products), thus reducing losses and waste as much as possible, both in the field and in other settings.

- EFAD supports the use of fiscal measures to incentivize healthy food consumption, and welcomes the application of new rates of VAT for organic fruit and vegetables and other products, that will be established along the process. This issue was addressed in our [ESDN Public Health Discussion Paper on Fiscal \(and other\) Measures influencing Food and Non-Alcoholic Drinks 2016](#) which is currently being reviewed and will eventually become a Policy Paper. Given the strong focus of the Strategy on producing eco-friendly foods and foodstuffs, we believe that actions on taxation should go further than using VAT as a unique financial tool, since healthy foods are, most of the time, more expensive and less accessible than unhealthy foods and beverages. While more evidence in the real market is needed, actions on taxes and subsidies have been reported to be effective in changing consumption by sufficiently high numbers of studies that their results should not be overlooked. Regulation of prices via taxation, including VAT, but also investing in improving food environments, preventing food deserts and food swamps, would contribute to ensuring food security, especially for vulnerable groups. Whilst the healthy choice is not possible for a large number of Europeans due to cost, assuming great variation across countries, the gap would be even bigger if sustainable/eco/bio choices that currently are more expensive were also included in calculations, highlighting even further the risks to vulnerable groups of food and nutrition insecurity. Inequality must be taken into account, as well as considering all people living in poverty.
- EFAD is concerned, as were several other attendees of the Advisory Group meeting, that the aims for every target are aspirational and not binding, but at the same time we recognize that this is one of the greatest challenges of the Strategy. However, we trust that the aims will be complementing the current regulation, will facilitate a viable transition for the food chain, agriculture, aquaculture and livestock, as a prior step for a stronger legislation affecting not only European production but also the food coming from countries outside the European Union. We are also glad that no staple food or food group is stigmatized, but we must take into account the urgent need for a transition of diets, so it will be inevitable to establish recommendations to encourage the consumption of some food groups and limit others that are currently in conflict with public health aims, not only through their nutritional composition but also for their impact on the environment.
- Despite the CAP representative stating the willingness of CAP to be aligned with the Strategy, we do not agree with what was mentioned during the presentation, when it was stated that “CAP does not have the key for healthy eating”. It is clear that there is a large difference between what we should be eating and what is actually being produced. Thus, we believe that the CAP should be a really key actor in this equation.

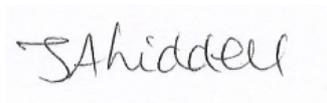
- Other actions aligned with the Strategy where EFAD has participated in official consultations include:
 - [CFS – FAO Voluntary Guidelines on Food Systems and Nutrition](#),
 - HGL of the [EU platform to encourage reformulation](#).
 - WHO response [on draft report noncommunicable disease and their risk factors](#),
 - [EFAD Response following meeting on health dimension of the EU School Scheme](#), etc.

Other operational issues:

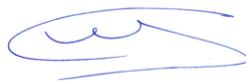
- EFAD would welcome a clearly established route for stakeholders to participate in discussions on the deliverables and actions within the framework of this Strategy

We thank you for your attention to these comments,

Yours sincerely,



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