



Four Paws position on the EU Legislative Framework for Sustainable Food Systems

Summary

The EU Commission is expected to publish a proposal on Framework for Sustainable Food Systems (FSFS) as one of the key actions of the Farm to Fork Strategy in the last quarter of 2023. According to the Commission, "this framework law should promote policy coherence at EU and national level, mainstream sustainability in all food-related policies and strengthen the resilience of food systems". FOUR PAWS believes this to be an incredible opportunity to address all economic, social and environmental impacts from all actors and processes along the entire food value chain, namely human, environmental and animal health.

Food, as a basic human need, not only needs to be available in terms of sufficient amount, affordable price and cultural appropriateness, but also in terms of high enough quality, because of how closely linked it is with our health. Our current diets are a major cause for obesity, and specifically our consumption of red and processed meat poses a cancer risk¹.

Food production, at least the current intensive industrial agricultural model with monocultures and chemical inputs, is putting a high pressure on the environment in terms of greenhouse gas emissions, biodiversity loss, water and energy use, and climate change². Industrial animal farming is also harming animal welfare considerably.

The EU is one of the biggest food producers in the world whilst also relying on imports to meet our demands³. This has increased the EU's negative externalities at home and abroad. Its productivity by hectare has increased considerably and, in the last 50 years, we have doubled our meat consumption, specifically poultry, fish and seafood.⁴

Improved animal welfare, reduced production of animal products and increased consumption of plant-based products are key to building sustainable food systems that operate within planetary boundaries. Instead of blaming the consumer for making the wrong choices, FOUR PAWS believes that production needs to be improved and the most sustainable choice needs to be made the easiest choice through enabling food environments for consumers.

Therefore, FOUR PAWS believes that there needs to be a new framework legislation to create a holistic approach to a sustainable food system covering all actors of the food chain and with binding rather than voluntary policies on food production and enabling food environments for consumers.



Animal welfare as a crossing-cutting component of sustainability

The EU “Farm to Fork” Strategy⁵, already stresses the “urgent need to improve animal welfare”, as essential to achieving a fair transition towards sustainable food systems⁶. High animal welfare should be defined as a key element to what constitutes a sustainable food system and should be taken into account in every relevant part of the framework. This would build upon the relevant aspirational objectives of the EU Code of Conduct for food businesses as well as what many consumers understand to be already included in the term⁷.

Increasing animal welfare has beneficial outcomes not just for animals, but also for the environment and for humans, as already set out in the One Health⁸ and One Welfare⁹ concepts. Improving animal welfare has also been recognised as contributing to achieving the Sustainable Development Goals¹⁰. Specifically, SDG 1 “End Poverty”, SDG 2 “Zero Hunger”, SDG 3 “Good Health and Wellbeing” could be addressed by increasing animal welfare because production systems that ensure high animal welfare tend to also have a lower negative impact on the environment, climate and livelihoods.

For example, keeping a limited number of farm animals in extensive, outdoor farming systems not only increases their welfare, but also maintains permanent grasslands, necessary for carbon sequestration and for maintaining rural landscapes that humans can in turn enjoy. Transitioning to these systems would also contribute towards the Commission’s objective of bringing at least 25% of EU’s agricultural land under organic farming by 2030 and to reduce the overall EU sales of antimicrobials for farmed animals and in aquaculture by 50% by 2030. High animal welfare practices is an multi-faceted component of sustainable food systems.

Under the current production model, the animal agriculture sector is under immense pressure to reduce its costs and compete on price at a European and global level. This has resulted in poor animal welfare conditions and a squeezing out of small-scale farmers who are unable to compete at cost, putting downwards pressure on environmental and social protections. Labour is a key component of cost for the meat processing industry, which puts pressure on the working conditions and wages in the sector; workers are often migrant and undocumented labourers¹¹.

Extensive livestock systems, which can provide higher animal welfare measures, often promote environmental and social cohesion in rural areas. According to an EU-funded study, mixed crop-and-livestock account for the largest share of jobs (37%) far ahead of pig and poultry farms (8%). This is due to the fact, that pig and poultry farms nowadays are typically large farms with high animal numbers and are characterized by a high standard of mechanisation, which allows for a lower intensity of manpower. Typically, the average European livestock farm is managed by 1 to 2 workers¹². Yet, a more localised food production system that prioritises animal welfare measures such as no live transport, but privileges on-farm slaughter and a local processing sector, could provide more local employment opportunities as well as in-built resilience to external shocks such as we have seen with the COVID pandemic.

FOUR PAWS believes that animal welfare is an integral part of any sustainable food system, as a stand alone value but also as a means of achieving the other aspects of sustainability such as human and environmental health. The FSLS therefore should place ‘ensuring animal welfare’ as a key objective.

Food not feed

FOUR PAWS acknowledges that feeding a growing world population is a challenge, but this will not be possible based on the current inefficient animal-based protein system. The conversion of animal feed into animal protein is accompanied by a huge loss of energy as the greatest part of the energy is used to simply keep the animal alive. In fact, only 4 to 25% of the protein inputs as



feed are converted into an animal product e.g., milk or meat, 96% to 75% would be lost during conversion¹³. Thus, if the protein plants that are fed to animals, or the arable land that is used for the cultivation of protein feedstuff, would instead be directly used for human consumption, more people could be fed¹⁴.

Over the last 40 years, farm animals have been bred for high yield that on one hand has led to severe animal welfare issues and on the other hand has dramatically increased the amount of protein feedstuff. Simply, because high performing animals have an extremely high demand for energy and protein. This has resulted in an unsustainable food chain resilient on feed imports originating from deforested lands in the Amazon basin or even in farm animals being exported live to another continent.

In a sustainable agricultural system,¹⁵ ruminants are fed with hay and grass according to their needs. Additionally, agricultural by-/waste- products could be used for poultry or pigs as feedstuff¹⁶. Such a production system, rooted in lower consumption of animal products, would have far fewer negative externalities for humans, animals and the environment.

FOUR PAWS believes that growing crops to feed livestock rather than directly to feed humans is an inefficient system that needs to be changed in order to meet the demands of a growing population. Humans should mainly eat plant-based foods, and the animals that they do eat should be fed on pastures.

Antimicrobial Resistance (AMR) and zoonotic disease risk

If the EU is to ensure a more resilient food system in the aftermath of the Covid-19 pandemic, it must address the threats an industrialised animal agricultural system presents not only to its citizens, but also its own viability; both in terms of the climate and biodiversity crises as well as AMR and zoonotic disease risk.

It is widely accepted that, globally, the massive use of antimicrobials contributes significantly to AMR. The livestock sector accounts for a large proportion of the total amount of antimicrobials used, but they are often administered to healthy animals at high risk of becoming sick due to environmental factors rather than on a therapeutic basis.

Many industrial farms use production methods that severely restrict basic animal behaviour and needs, such as access to the natural environment and free movement, especially in cage-keeping systems. This causes chronic immuno-suppressant stress that leads to unhealthy animals.

Under natural outdoor conditions, a more virulent pathogen might be less transmissible, because in killing its host, it reduces the opportunity for transmission¹⁷. This naturally limiting mechanism is bypassed, however, under the cramped and unhygienic conditions found in factory farms. Additionally, the genetic proximity in high-performance breeds decreases resilience to diseases¹⁸ and adaptability to environmental stressors. High density systems offer ideal circumstances for pathogens to mutate and evolve, which increases the risks of a mutation that is transmissible to humans.

The EU must also consider its impact beyond the farm-gate, and the Union. Land use change for agriculture is a major driver of the emergence of infectious diseases¹⁹ as expansion into highly biodiverse ecosystems removes the buffer zones that reduce the risk of spill-over at the animal-human-environment interface.

FOUR PAWS believes that the most efficient and sustainable way to reduce routine antibiotic use



is by a fundamental improvement in keeping conditions with lower animal numbers and a consistent ban on high-performance breeding lines. Providing high welfare can ensure that animals are in good health and their immune systems are strong, making them less prone to infections that require antibiotic treatment or that could be transmissible to humans. At the same time, transitioning to high animal welfare farming can only happen along with a transition to sustainable, predominantly plant-based diets that lift the pressure of intensive agriculture off the environment and safeguard human health; this should be a key concern of the framework.

Food environments

The most sustainable food choices are not always the cheapest, most attractive or even at all available. Worse yet, consumers are being misled through false or unsubstantiated claims such as, for instance, pictures of a cow in a beautiful meadow where the animals are in fact kept in intensive production systems, or through claims on certain health aspects of otherwise unhealthy foods. This means that consumers make choices negatively affecting animal welfare and the environment, but it can also affect their diet and health, leading to obesity and increasing the number of non-communicable diseases such as cancer, of which red meat has proved to be a root cause²⁰.

FOUR PAWS believes that the FSFS should explore all dimensions of the EU food environments in a holistic, horizontal and harmonised way to become more sustainable²¹.

Food prices

Our food system based on intensification and low prices had created a 'cheaper food paradigm'²² wherein the more we produce, the cheaper food becomes, the more we consume, which means the more resources we exploit; and the more resources we exploit, the more we drive environmental degradation and disrupt natural ecosystems.

'Discounted' food also encourages nutritionally suboptimal diets, particularly for lower-income households and leads to dual malnutrition issues of obesity and hunger and related non-communicable diseases like diabetes and heart disease.

Yet, lost income due to ill health and the costs on public health systems as well as the price of mitigating and adapting to climate change and environmental degradation are not paid for by the food and farming businesses that cause them, nor are they included in the retail price of food. These hidden costs are instead paid by society as a whole.

FOUR PAWS believes that responsibility for a fair and sustainable food system cannot be placed on consumers alone. Solutions like True Cost Accounting allow decision-makers to measure and assess the full costs, but also the value of food systems. Going beyond outdated metrics like "yield-per-hectare", they help improve the understanding of food systems more widely by revealing the invisible connections and interactions between agriculture and food systems, our health, the natural environment, and the treatment of workers and communities.

It is therefore of uttermost importance that the FSFS tackles this problem of pricing, by ensuring that prices of the cheapest animal-based products are increased to a level where it becomes more sustainable to produce less animals, but in a more sustainable and animal welfare friendly way, also more rewarding for the farmers.

The framework must ensure that future food and farming legislation, like the CAP and the Agricultural Promotion Policy, reflects such an ambition and better supports sustainable food production. This includes improving criteria for subsidies and through incentives to help farmers transition from harmful agricultural practices towards regenerative farming systems that prioritise a shift towards more plant-based food and animal and environmental protection over productivity.



Policy Recommendations

Recommendations for the FSFS

- Evaluation of the maximum number of animals that can be raised in the European Union within planetary boundaries
- Offsetting of minimum standards for public procurement policies that respect high animal welfare criteria and that specify the serving of a certain portion of plant-based protein per week.
- Setting of clear targets across the food chain to reduce meat and dairy consumption in line with WHO dietary guidelines and planetary boundaries (with indicators and monitoring). It should include an EU Action Plan on how to achieve this (including financial and social policies, marketing and nutritional education) and require member states to draft their own National Strategic Sustainable Food Systems Plans.
- Public money should not be spent on promotional campaigns encouraging the consumption of meat and fish, if so only on products from certifiable climate/welfare friendly methods. The SFSF should allow for diverting promotional money to boosting the 'image' of protein crops and fruit and veg.
- The SFSF should support the development and production of sustainable European plant-based food as well as innovative alternatives to meat and dairy that mimic taste and texture. This must be accompanied by the elimination of technical and financial barriers for plant-based products and cellular agriculture.

Recommendations for other legislations

- A delegated legislation could create a framework for true pricing of food that internalises costs (polluter pays principle). Any revenue raised should be used to go back into animal welfare and climate friendly practices, lowering these costs for farmers and consumers.
- The EU School Scheme, supporting dairy products, should include a requirement for dairy products only being made available if they can be proven to be from animal welfare and climate friendly sources.
- Better transparency through labelling: a mandatory animal welfare label for all animal-derived food products, including processed food, retail, and out-of-home consumption that includes method-of-production-plus (MOP+), and a Country-of-Origin label for meat-based products.
- Regulating misleading and unsubstantiated claims, showing for instance pictures of a cow in a beautiful meadow where the animals are in fact kept in intensive production systems.
- A WTO compliant legislation that ensures imported animal-based products respect EU rules and meet the highest animal welfare standards.

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Endnotes

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