

FOODDRINKEUROPE RECOMMENDATIONS ON THE IMPLEMENTATION OF THE EU 2030 BIODIVERSITY STRATEGY

The food and drink industry is committed to move towards more sustainable food systems and contribute to preserve, protect and restore biodiversity. As a major buyer of agricultural raw materials and ingredients, our sector and its supply chain partners are highly dependent on healthy ecosystems and have an important role to help deliver on the EU's objectives set out in the new Biodiversity Strategy. In this context, we support the Commission's ambition to develop more ambitious measures to safeguard biodiversity in Europe and beyond. Our recommendations for the way forward.

I. General remarks

The Biodiversity Strategy is a unique opportunity to contribute to a truly holistic and systematic approach to EU food policy which s bring together the most relevant issues relating to food production and consumption in one single place. It also offers momentum to repurpose current policies and mainstream sustainability across all food related legislation.

Furthermore, we believe that biodiversity and resource efficiency should be aligned with the 2050 climate neutrality objectives and support the proper implementation of the United Nations' Sustainable Development Goals. It should also be coherent and consistent with other key elements of the European Green Deal, such as the Common Agricultural Policy (CAP) the Farm to Fork (F2F) strategy and the EU Research policy and trade policy and other existing support frameworks.

We call for the development of an ambitious policy environment that will meet the EU's biodiversity objectives while leaving no one behind, especially in the aftermath of coronavirus, in a more sustainable and inclusive manner. Moreover, any political decisions should be based on reliable scientific data and comprehensive impact assessments, which take into account economic impacts alongside impacts on food security and food safety.

II. Protecting and restoring nature in the EU

1) Biodiversity-related targets

The European food and drink sector use around 70% of the EU agricultural production¹. It relies on the supply of safe and competitively priced agricultural raw materials, with the quantity and quality needed to produce varied high-quality food for European consumers and export markets. The long-term sustainability of our industry thus relies on the long-term

¹ Wageningen University [fact sheet](#) (2018) 'The EU food and drink industry use of domestic raw material'

economic, environmental and social sustainability of the farming sector. While we welcome proposals to reduce and limit the use of pesticides and fertilisers to protect biodiversity, we believe that such measures should be pre-assessed diligently. As shown by research, such measures could have undesirable impacts on yields, the quality (e.g. levels of mycotoxins, certain plant toxins) and prices of raw materials on which food processors rely. At the same time food security and safety is also threatened by climate change, biodiversity loss, decline in natural pollinators, soil degradation, and water pollution.

We thus call on the Commission to conduct cumulative impact assessments to ensure that any targets related to protected areas/land use, pesticides, organic farming and fertilisers will contribute to preserve the food chain's long-term resilience and our ability to provide consumers with a secure supply of high quality, safe and sustainable food at affordable prices. These impact assessments should go alongside an analysis of the accomplishments achieved to date, the availability of alternative products and agriculture practices while guaranteeing the competitiveness of the food chain.

Furthermore, EU policies related to e.g. CAP, research and food safety should support the quest for viable alternatives and use of digital technologies to improve the use of chemical pesticides and fertilisers². In particular, they should facilitate research and innovation, improve market access procedures and promote uptake by farmers.

We also urge for the establishment of a structured and inclusive dialogue with all stakeholders to ensure that food security and safety, economic recovery and sustainability objectives are not compromised.

2) Restoring freshwater ecosystems and soil

Climate change is increasingly impacting water supplies. In the last decades, among other measures, food and drink manufacturers have been working in partnership with farmers to ensure more sustainable agricultural practices. For instance, some food business operators are working to improve the quality and efficiency of water used and implementing measures to protect the wider water catchment areas.

The protection and sustainable management of all types of water resources should be urgently fostered by Member States and public and private sectors. In this context, the food and drink sector embraces³ the ambition of the Water Framework Directive (WFD)⁴. This Directive is key to protect and enhance the status of water quality and aquatic ecosystems, like natural fish populations including migratory fish, and to promote sustainable water use and management across Europe. We urge for further efforts to be made to ensure its proper implementation, based on a common and practically feasible understanding of the definitions and requirements.

The food and drink industry also supports accelerated actions with a view to prevent soil degradation and to restore soil health. To accelerate the transition towards conservation agriculture, public private partnerships should be developed, alongside strengthened collaboration between industry and academia (i.e. R&I) and incentives under the CAP.

² As highlighted in the Sustainable use of Pesticides Directive ([SUD](#))

³ See FoodDrinkEurope [position](#) on water

⁴ [Directive 2000/60/EC](#)

3) Forests

The food and drink industry supports⁵ the development of enabling frameworks to increase the quantity and improve the health and resilience of European forests, including through a new EU forest strategy post-2020. These frameworks should build upon existing EU instruments related to

forest protection and management⁶, which implementation at national level should be bolstered at national level. Sustainable forest management initiatives should also be aligned with other sectoral policies, such as the CAP and Climate Law.

At international level, we share the Commission's objectives to minimise the EU's contribution to deforestation and forest degradation worldwide and to promote the consumption of products from deforestation-free supply chains in the EU. As the EU consumes about 10% of global embodied deforestation through its imports, including of agricultural goods⁷, we call for the EU to leverage its trade policy and diplomacy efforts to establish and encourage measures aiming to tackle deforestation of rainforests in producer countries (see also under Section IV).

To this end, we are committed to strengthen the credibility and reliability of forest related certification schemes.

III. Enabling transformative change

1) Business for biodiversity

The European food and drink industry subscribes to the highest standards of environmental and social sustainability throughout the entire value chain, including human and labour rights and animal health and welfare. We support ongoing political initiatives to explore human rights and environmental due diligence requirements amongst all actors and as part of a smart mix of actions to promote more sustainable and responsible business practices. By conducting due diligence, businesses can assess their impacts on human rights and the environment, address the most relevant ones and report in a transparent manner. Due diligence should apply to all actors in the supply chain to level the playing field and be very clear on the issues that covers to ensure proper implementation and avoid unintended consequences.

In this context, we reiterate⁸ our call for the establishment of an EU-wide harmonised framework on sustainable corporate governance that encourages all actors of the food value chain to adopt due diligence practices in particular for human rights and deforestation. Such framework should aim to enhance economic operators' awareness on human rights and environmental responsibility, to facilitate due diligence processes, and to promote collaborative, impactful and effective actions on the ground.

⁵ See FoodDrinkEurope [position](#) on forest protection and restoration

⁶ Such as Forest Law Enforcement, Governance and Trade Action Plan ([FLEGT](#)) including its voluntary partnership agreements ([VPA](#)) and the EU Timber Regulation ([EUTR](#))

⁷ Commission technical [report](#) (2013-063) - 'The impact of EU consumption on deforestation: Comprehensive analysis of the impact of EU consumption on deforestation'

⁸ FoodDrinkEurope [position paper](#) on forest protection and restoration

2) Measuring and integrating the value of nature

We support the Commission's intentions to develop EU-harmonised methods, criteria and standards to describe, assess and evaluate the characteristics of biodiversity such as services, values, and sustainable use. These could be also helpful for green investments and the Green recovery.

Moreover, the Commission should assess the feasibility to further define biodiversity aspects in the EU Product Environmental Footprint (PEF) methodologies. This should be done in a way that does not further complicate the methodology nor the information that can be provided to consumers as far as they have been developed.

The PEF, and its eleven food and beverage product category rules, put Europe at the forefront of international thinking and action in the environmental sustainability area however it does not yet effectively address biodiversity aspects⁹.

To engage consumers in preserving biodiversity, the EU should establish a harmonised methodology on how to make standardised environmental information available to consumers, based on PEF¹⁰.

IV. An ambitious global agenda

1) Raising the level of ambition worldwide

We support the Commission's ambition to establish a new Biodiversity governance framework to ensure coherent and coordinated implementation of all biodiversity-related obligations and commitments agreed at national, EU and global level. We also support the Commission's goal to achieve an ambitious agreement for a new global framework for post-2020 at 15th Conference of the Parties to the Convention on Biological Diversity. In this context, global platforms such as One Planet to Biodiversity (OP2B)¹¹ should be supported.

2) Trade

We support the EU's efforts to include Trade and Sustainable Development Chapters in EU Free Trade Agreements which reflect biodiversity, climate and other sustainability commitments. We believe that these chapters should advocate for global, science-based biodiversity targets.

In general, trade policy should help support the sustainable development of the European food sector and facilitate security of food supply. It should also provide fair terms of competition and a level-playing field for EU food producers. Policy coherence between EU trade policy and other EU policies is also essential to uphold the integrity of the Single Market and the competitiveness of the agri-food sector. It should be further complemented by EU efforts to raise sustainability standards globally.

⁹ FoodDrinkEurope [proposal](#) for a harmonised framework for the voluntary use of the PEF in environmental product claims

¹⁰ FoodDrinkEurope [views](#) on Environmental Information

¹¹ [OP2B](#)

In particular, EU trade policy should help promote forest-friendly imports and foster long-term partnerships between the EU and producer countries at both government and business level. It should aim to create an enabling environment for more sustainable value chains that reach into the EU market.

Bilateral partnerships with producer countries should strengthen local governance, improve legal enforcement and enable economic development. They should provide local authorities with incentives and support to promote the conservation of biodiversity and natural forests while promoting human rights. They should also contribute to preserve and improve the livelihoods of the people that depend on forests. Support could take the form of integrating inclusive land-use planning, the development and implementation of forest monitoring and assessment programmes, as well as the setting up of national traceability systems to increase the transparency of supply chains.

The newly established Commission multi-stakeholder platform/expert group on “Protecting and Restoring the World’s Forests” should provide a forum to hold constructive and inclusive exchanges between stakeholders on these matters. We recommend a structured and recurrent inclusion of representatives from producer countries in the platform’s discussions.

FoodDrinkEurope represents Europe’s food and drink industry, Europe’s largest manufacturing sector in terms of turnover, employment and value added. FoodDrinkEurope works with European and international institutions, in order to contribute to the development of a legislative and economic framework addressing the competitiveness of industry, food quality and safety, consumer protection and respect for the environment. FoodDrinkEurope membership consists of 25 national federations, including 2 observers, 27 European sector associations and 21 major food and drink companies. For more information on FoodDrinkEurope and its activities, please visit: www.fooddrinkeurope.eu.