

## Sustainability of the Food System - Public Consultation

Information about yourself / your organisation	
Your full name -open reply-( <b>compulsory</b> )	Tracey Reilly
Your contact email address -open reply-( <b>optional</b> )	tracey@nourishscotland.org.uk
I am replying as a..... -single choice reply-( <b>compulsory</b> )	NGO
Please give the name of your association/organisation/authority etc. (if appropriate) -open reply-( <b>optional</b> )	Nourish Scotland
Country (or countries) of you or your organisation -multiple choices reply-( <b>optional</b> )	UK - United Kingdom
How would you prefer your contribution to be published on the Commission website? -single choice reply-( <b>compulsory</b> )	Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
How well informed are you about the sustainable production and consumption of food? -single choice reply-( <b>optional</b> )	Fairly well informed
Defining Sustainable Food	
Do you / your organisation think it is important to have an agreed definition of sustainable food? -single choice reply-( <b>optional</b> )	Yes
Do you / does your organisation use a specific definition or specific criteria to guide your work? -single choice reply-( <b>optional</b> )	No
Which of the following issues do you think should be considered as falling within the scope of a strategy on the sustainability of the food system? (You may select more than one) -multiple choices reply-( <b>optional</b> )	Climate change - Water scarcity - Toxic emission to air and water (nitrogen / phosphorus) - Soil degradation - Food security (which means a combination of 'food availability' - having available sufficient quantities of food on a consistent basis, and 'food access' - having sufficient resources, both economic and physical, to obtain the appropriate foods for a nutritious diet.) - Food price stability / impact of excessive food price volatility - Obesity and related chronic diseases prevention - Malnutrition and under-nutrition
If you have any further comments to add on the subject of defining 'sustainable' in relation to food sustainability, please do so here. -open reply-( <b>optional</b> )	Rather than focusing on whether an individual food product can be seen as sustainable, Nourish prefers to focus on creating a more sustainable system of food production. This would involve: More sustainable diets; co-operation between cities and rural areas; public procurement of organic food; support for new small agroecological farms; stronger links between food policy and public health policy, and joined up research and development on climate-smart and resource-efficient food production.

## Moving towards a more sustainable food system - identifying and assessing policy options

### Better technical knowledge on the environmental impacts of food products

<p>a. Develop a <u>standardised methodology</u> for measuring the environmental impacts of food products. -single choice reply-(optional)</p>	<p>Not particularly</p>
<p>b. Make <u>data</u> on the environmental impacts of food more <u>transparent and accessible</u>. -single choice reply-(optional)</p>	<p>Not particularly</p>
<p>c. Develop <u>technical guidance</u> on how to identify more sustainable food products -single choice reply-(optional)</p>	<p>Not particularly</p>
<p>d. Develop <u>sustainability criteria</u> for specific food products. -single choice reply-(optional)</p>	<p>Not particularly</p>
<p>e. <u>Quantify</u> in economic terms, the <u>environmental and social costs associated with food products or diets</u> (i.e. any hidden costs or 'externalities') -single choice reply-(optional)</p>	<p>Fairly</p>
<p>Do you have any <u>other proposals</u> for actions aimed at improving our technical knowledge on food products? If so, please specify here. -open reply-(optional)</p>	
<p>Do you think that any specific food product categories should be prioritised for action? If so, please specify the product group and explain why this should be seen as a priority. -open reply-(optional)</p>	<p>Although it would be useful to have the technical information referred to in the table above, it is likely to be up to individual producers or co-operatives to decide a) whether to apply these methodologies to their products, b) what information to supply to customers and c) how to best communicate that information to customers. Such information could be used by sustainable producers as a selling point or a way of differentiating their products from those of competitors. Because of the complex methodologies used and the complex decisions made about how best to use our scarce resources, the widespread application of such schemes to products would require a large consumer education programme to allow citizens and buyers to make informed choices and to evaluate the claims made by producers.</p>
<p>a. Develop a <u>standardised methodology</u> for measuring the environmental impacts of food products. -single choice reply-(optional)</p>	<p>Local</p>
<p>b. Make <u>data</u> on the environmental impacts of food more <u>transparent and accessible</u>. -single choice reply-(optional)</p>	<p>Local</p>
<p>c. Develop <u>technical guidance</u> on how to identify more sustainable food products -single choice reply-(optional)</p>	<p>Local</p>
<p>d. Develop <u>sustainability criteria</u> for specific food products. -single choice reply-(optional)</p>	<p>Local</p>

<p>e. <u>Quantify</u> in economic terms, the <u>environmental and social costs</u> associated with food products or diets.</p> <p>-single choice reply-(optional)</p>	<p>EU</p>
<p>For any <u>other actions</u> you have suggested, at <u>what level</u> do you think they would be best taken forward? (Global / EU / National / Local)</p> <p>-open reply-(optional)</p>	
<p>Please give any further details of how you would implement your preferred action/s. -open reply-(optional)</p>	
<p>Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why? -open reply-(optional)</p>	<p>Nourish believes that it would be most useful for the EU to provide ways of quantifying the costs of particular systems of production or of particular diets, rather than individual products. For example, to quantify the health and social impacts of a diet high in salt, sugar, fat or transfats or the environmental impacts of intensive fish or livestock systems which rely on high use of animal feeds or nitrate based fertilisers or pesticides. Such analysis would provide quantifiable data to allow members states to take more informed decisions about how to regulate their own production and consumption.</p>
<p>Do you have any quantative information concerning the benefits and costs of implementing these actions? If so, please give details here. (You may include links or upload relevant documents if you wish.) -open reply-(optional)</p>	
<h3>Stimulating sustainable food production</h3>	
<p>a. Regional, wholesale markets.</p> <p>-single choice reply-(optional)</p>	<p>Not particularly</p>
<p>b. Seasonally produced food.</p> <p>-single choice reply-(optional)</p>	<p>Not particularly</p>
<p>c. Diversification of cultivated species.</p> <p>-single choice reply-(optional)</p>	<p>Fairly</p>
<p>d. Productive, intensive agriculture.</p> <p>-single choice reply-(optional)</p>	
<p>e. Extensive, integrated agriculture.</p> <p>-single choice reply-(optional)</p>	
<p>f. Organic production.</p> <p>-single choice reply-(optional)</p>	<p>Very</p>
<p>g. Sustainable sourcing of key food commodities.</p> <p>-single choice reply-(optional)</p>	<p>Very</p>
<p>h. Higher animal welfare standards.</p> <p>-single choice reply-(optional)</p>	<p>Not particularly</p>
<p>Do you have any <u>other proposals</u> for actions aimed at helping to make food production more sustainable? If so, please specify here. -open reply-(optional)</p>	

a. Regional, wholesale markets. -single choice reply-(optional)	National
b. Seasonally produced food. -single choice reply-(optional)	National
c. Diversification of cultivated species. -single choice reply-(optional)	EU
d. Productive, intensive agriculture. -single choice reply-(optional)	National
e. Extensive, integrated agriculture. -single choice reply-(optional)	National
f. Organic production. -single choice reply-(optional)	EU
g. Sustainable sourcing of key food commodities. -single choice reply-(optional)	Global
h. Higher animal welfare standards. -single choice reply-(optional)	National
For any <u>other actions</u> you have suggested, at what level do you think they would be best taken forward? (Global / EU / National / Local / Retailer / Producer) -open reply-(optional)	
Please give any further details of how you would implement your preferred action/s -open reply-(optional)	
Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why? -open reply-(optional)	Nourish believes that it is vital to make progress at an international level in two areas; organic farming and sustainable sourcing. Agriculture disrupts three key natural cycles – water, nitrogen, carbon. Organic farming locks up more soil carbon, uses less water for irrigation, and does not introduce additional reactive nitrogen from the air into the soil and water. Additionally, organic farming does not introduce new compound chemicals from pesticides into the soil, air and water. Greater support for organic farming, and public procurement of organic products will deliver widespread environmental benefits. Because of the worldwide nature of food production, it is important that progress on sustainable sourcing is made on a global scale. This is particularly important given the amount of grain production that takes place in the US and the extent of soya and maize production in developing countries. Western demand is often responsible for land-use decisions (and changes) in the developing world, which may have severe impacts on issues such as water use and bio-diversity.
Do you have any quantitative information concerning the benefits and costs of implementing these actions? If so, please give details here. You may include links or upload relevant documents. -open reply-(optional)	
<b>Promoting sustainable food consumption</b>	
a. Agreeing a common set of <u>guideling principles</u> of what constitutes 'sustainable' diet.	Fairly

-single choice reply-(optional)	
b. Develop ideas for <u>food labelling schemes</u> and/or <u>on-package information</u> highlighting more sustainable choices. -single choice reply-(optional)	Fairly
c. Run <u>information campaigns</u> on the environmental impacts of different food choices. -single choice reply-(optional)	very
d. Promote more sustainable food choices in retail outlets by <u>increasing their availability/accessibility</u> . -single choice reply-(optional)	very
e. Assess the scope for using <u>personal technology</u> for accessing information, e.g. smart phone apps, bar code readers, etc -single choice reply-(optional)	Fairly
f. Develop and encourage the use of <u>Green Public Procurement</u> guidelines, to help public bodies (or private organisations) purchase food sustainably. -single choice reply-(optional)	very
Do you have any <u>other proposals</u> for actions aimed at helping to promoting sustainable food consumption? If so, please specify here. -open reply-(optional)	
a. Agreeing a common set of <u>guiding principles</u> of what constitutes 'sustainable' diet. -single choice reply-(optional)	EU
b. Develop ideas for <u>food labelling</u> schemes and/or <u>on-package information</u> highlighting more sustainable choices. -single choice reply-(optional)	EU
c. Run <u>information campaigns</u> on the environmental impacts of different food choices. -single choice reply-(optional)	National
d. Promote more sustainable food choices in retail outlets by <u>increasing their availability/accessibility</u> . -single choice reply-(optional)	National
e. Assess the scope for using <u>personal technology</u> for accessing information, e.g. smart phone apps, bar code readers, etc -single choice reply-(optional)	National
f. Develop and encourage the use of <u>Green Public Procurement</u> guidelines, to help public bodies (or private organisations) purchase food sustainably. -single choice reply-(optional)	EU
For any <u>other actions</u> you have suggested, at <u>what level</u> do you think they would be best taken forward? (Global / EU / National / Local /	

Retailer / Producer) -open reply-(optional)	
Please give any further details of how you would implement your preferred action/s. -open reply-(optional)	Additional work will be required to support the greater availability and accessibility of sustainable food. For example, the development of new retail options and alternatives to supermarkets and multiple retailers. These could include online shops, covered markets or delivery services. Small-scale, sustainable producers will require support to develop food labelling, packaging and marketing information to promote their products and will also require help in accessing markets. This may involve assistance to scale up activities, to pay brokers to negotiate contracts or technical support to help them meet the requirements of buyers in packaging, labelling etc It is also important that these products remain accessible to all citizens, including those who are experiencing poverty or who live and work in remoter areas.
Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why? -open reply-(optional)	Because of the spending power behind large companies and public organisations' procurement programmes and the volume of goods procured, the development of green procurement guidelines across the EU could provide a substantial catalyst for change and a means of positively influencing buying decisions. The development of funding streams to allow members states to create alternative retail infrastructure, featuring shorter supply chains and less processed foods would also be of high benefit as would funding for member states to develop information campaigns around the impact of food choices.
Do you have any quantitative information concerning the benefits and costs of implementing these actions? If so, please give details here. You may include links or upload relevant documents. -open reply-(optional)	

## Preventing and reducing Food Losses & Food Waste

a. Develop/disseminate <u>consumer information</u> on avoiding <u>over-purchasing</u> . -single choice reply-(optional)	Fairly
b. Develop/disseminate <u>consumer information</u> on the meaning of food <u>date labels</u> . ('best-before', 'use-by', 'sell-by') -single choice reply-(optional)	Fairly
c. Develop/disseminate <u>consumer information</u> on better <u>storage</u> of food. -single choice reply-(optional)	Fairly
d. Develop/disseminate <u>consumer information</u> on more sustainable food <u>preparation</u> and <u>use of leftovers</u> . -single choice reply-(optional)	
e. Establish new <u>education campaigns</u> on food waste prevention aimed at <u>children</u> . -single choice reply-(optional)	Fairly
f. Establish new <u>education campaigns</u> on food waste prevention aimed at <u>adults</u> . -single choice reply-(optional)	Fairly
g. Facilitate the <u>exchange of good practices</u> on food	Fairly

<p>waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.</p> <p>-single choice reply-(optional)</p>	
<p>h. Clarify the <u>EU VAT Directive for donation</u> of surplus food to food banks for Member States and businesses.</p> <p>-single choice reply-(optional)</p>	Don't know
<p>i. Encourage best-practice in relation to <u>food date labels</u> by food business operators to minimise wastage.</p> <p>-single choice reply-(optional)</p>	Fairly
<p>j. Develop <u>EU Food Donation Guidelines</u> for food donors and food banks on how to comply with the EU Food Hygiene legislation (types of food suitable for donation, conditions for transport and traceability, legal liability, etc.)</p> <p>-single choice reply-(optional)</p>	Don't know
<p>k. Agree a common <u>EU definition of food waste</u>, classifying products as food, feed or waste etc. as appropriate.</p> <p>-single choice reply-(optional)</p>	Very
<p>l. Develop a <u>standardised methodology for collecting and reporting data</u> on food waste to ensure data comparability across Member States.</p> <p>-single choice reply-(optional)</p>	Very
<p>m. Introduce <u>reporting requirements</u> on food waste.</p> <p>-single choice reply-(optional)</p>	Very
<p>n. Set <u>binding targets</u> for food waste prevention.</p> <p>-single choice reply-(optional)</p>	Not particularly
<p>Do you have any <u>other proposals</u> for actions on preventing and reducing food losses &amp; food waste? If so please specify here. -open reply-(optional)</p>	<p>Working with consumers to reduce excess buying and food waste and to encourage safe re-use or recycling is a good thing. Recent experience in the city of Edinburgh has shown that introducing appropriate collection systems can boost recycling (by 240%) and prevent food waste from entering landfill. The Scottish Government is also running a number of worthwhile schemes (Love Food Hate Waste, Kitchen Canny for example) which have effectively influenced householder behaviours and reduced waste. However, much food waste comes from higher up the food chain. Given the percentages involved it would be more useful to consider, at an EU level, how to reduce on-farm waste, processor waste and retailer waste. In addition, hospitality businesses produce significant amounts of waste during food preparation. Working with the food industry can significantly reduce waste before it even reaches the consumer.</p>
<p>a. Develop/disseminate <u>consumer information</u> on avoiding <u>over-purchasing</u>. -single choice reply-(optional)</p>	National
<p>b. Develop/disseminate <u>consumer information</u> on the meaning of food <u>date labels</u>. ('best-before', 'use-by', 'sell-by')</p> <p>-single choice reply-(optional)</p>	National

<p>c. Develop/disseminate <u>consumer information</u> on better <u>storage</u> of food.</p> <p>-single choice reply-(optional)</p>	National
<p>d. Develop/disseminate <u>consumer information</u> on more sustainable food <u>preparation</u> and <u>use of leftovers</u>.</p> <p>-single choice reply-(optional)</p>	National
<p>e. Establish new <u>education campaigns</u> on food waste prevention aimed at <u>children</u>.</p> <p>-single choice reply-(optional)</p>	National
<p>f. Establish new <u>education campaigns</u> on food waste prevention aimed at <u>adults</u>.</p> <p>-single choice reply-(optional)</p>	National
<p>g. Facilitate the <u>exchange of good practices</u> on food waste prevention and reduction activities at all levels: producers, retailers as well as local, regional and national authorities.</p> <p>-single choice reply-(optional)</p>	EU
<p>h. Clarify the <u>EU VAT Directive for donation</u> of surplus food to food banks for Member States and businesses.</p> <p>-single choice reply-(optional)</p>	EU
<p>i. Encourage best-practice in relation to <u>food date labels</u> by food business operators to minimise wastage.</p> <p>-single choice reply-(optional)</p>	
<p>j. Develop <u>EU Food Donation Guidelines</u> for food donors and food banks on how to comply with the EU Food Hygiene legislation (types of food suitable for donation, conditions for transport and traceability, legal liability, etc.)</p> <p>-single choice reply-(optional)</p>	EU
<p>k. Agree a common <u>EU definition of food waste</u>, classifying products as food, feed or waste etc. as appropriate.</p> <p>-single choice reply-(optional)</p>	EU
<p>l. Develop a <u>standardised methodology for collecting and reporting data</u> on food waste to ensure data comparability across Member States.</p> <p>-single choice reply-(optional)</p>	EU
<p>m. Introduce <u>reporting requirements</u> on food waste.</p> <p>-single choice reply-(optional)</p>	EU
<p>n. Set <u>binding targets</u> for food waste prevention.</p> <p>-single choice reply-(optional)</p>	Action not needed
<p>For any <u>other actions</u> you have suggested, at <u>what level</u> do you think they would be best taken forward? (Global / EU / National / Local /</p>	



<p>Retailer / Producer)</p> <p>-open reply-(optional)</p>	
<p>Please give any further details of how you would implement your preferred action/s. -open reply-(optional)</p>	
<p>Which out of these actions (including any of your suggestions) would you give the highest priority for the European Commission to take forward, and why? -open reply-(optional)</p>	
<p>Do you have any quantitative information concerning the benefits and costs of implementing these actions? If so, please give details here. You may include links or upload relevant documents. -open reply-(optional)</p>	
<p>Are there any key initiatives are you undertaking or that you are aware of in the area of preventing/reducing food losses and food waste that you would like to share? (these could form part of a 'best practice' reference.) -open reply-(optional)</p>	<p><a href="http://www.lovefoodhatewaste.com/">http://www.lovefoodhatewaste.com/</a></p>
<p>Do you have economic and/or quantitative data related to food losses and food waste? If so, please provide details and/or links to you information here.....(you may upload files with this question)</p> <p>-open reply-(optional)</p>	
<h2>Preventing food waste and losses in developing countries</h2>	
<p>What initiatives are you already undertaking, or are you aware of, in the area of reducing food waste and losses internationally? -open reply-(optional)</p>	
<p>What actions / policies do you think the EU should prioritise to help prevent food waste and losses in developing countries? -open reply-(optional)</p>	<p>The EU could work to promote more effective buying arrangements, such as forward contracts for supply and to promote better links and communication between producers and citizen buying groups</p>
<h2>Improving food policy coherence</h2>	
<p>Do you think the way our food system is set up is suitable to equip it for future challenges?</p> <p>-single choice reply-(optional)</p>	<p>no</p>
<p>If you would like to give more details in relation to your answer, please do so here. -open reply-(optional)</p>	<p>In addition to addressing food waste and the promotion of more discerning food choices, a coherent food policy should also address the consumption of natural resources during the food production process. By this we mean the use of land, the consumption of water and energy and the application of nitrates and</p>

	phosphorus. The policy should also encompass the management of emissions from food production, distribution and storage as well as the disposal of food waste.
Do you think there are any inconsistencies / incoherence between policies related to food production and consumption? -single choice reply- (optional)	yes
Please specify. -open reply-(optional)	
Do you think there are any regulatory, or other, barriers to sustainable food production and/or consumption? -single choice reply-(optional)	
Do you have examples of good practice to share that demonstrate a more sustainable approach to food system governance? (i.e. where, for example, the typical relationship between producers, retailers, consumers, policy makers etc. has been changed somehow.) -open reply- (optional)	The UK has developed a Sustainable Food Cities network, encouraging cities to develop their own local food strategies which encompass issues such as land use, procurement, affordability and access, environmental impact and health and wellbeing. In Edinburgh, a steering group called Edible Edinburgh is in the process of developing this strategy. In pulling together different sectors – business, retailers, producers, the voluntary sector and community planning partners – the strategy enables a coherent local approach to be taken. It would be useful if, at EU level, some work could be done to facilitate the development of benchmarking data so that cities can measure their progress in becoming more sustainable.
How do you think the overall governance of the food system could be adapted in order to ensure more coherent action at EU level? -open reply- (optional)	The current CAP is focused on maximizing the production and supply of food. It inherently favours large scale enterprises, with payments made per hectare. In our view the CAP should be replaced with a common food policy, which would provide greater incentives towards small scale, often family run, sustainable food production and enable nations and regions to focus more on feeding themselves and less on export trade.
a. Perform a comprehensive <u>review</u> of relevant food policies (International/EU/National/local) to check that they are aligned with each other, that they are coherent, and are <u>in line with agreed sustainability goals</u> . (Also known as a 'fitness check') -single choice reply-(optional)	Fairly
b. Support national and local food system governance by <u>sharing good practices / provide guidance</u> on implementing sustainable food strategies. -single choice reply-(optional)	Very
c. Identify <u>environmentally harmful subsidies</u> (EHS) in the food sector. -single choice reply-(optional)	Very
d. Establish <u>new coordination bodies</u> (or reorganise existing bodies) to provide coherence on in the field of food sustainability. -single choice reply-(optional)	Fairly
Do you have any <u>other proposals</u> for actions on improving food policy coherence? -open reply- (optional)	The current system of food governance across the EU is very top-down in its implementation. The Scottish Government should be commended for its work in developing a food policy for Scotland. To have a food policy in a single document is a big leap forward in such a cross-cutting area. However, this policy remains primarily focused on export driven production and more attention needs to be

	<p>paid to providing affordable and accessible food for our own citizens. Nourish believes that it is important for actions to come from citizens, civil society and from communities rather than actions simply trickling down from government. A more coherent food policy would encourage citizens to take ownership of the ideas within it, to make appropriate and informed choices and to influence others. It should be about building effective relationships between food and farming and between citizens, buyers and producers. It should have the aim of ensuring all citizens have access to a healthy and nutritious diet and have the skills to feed themselves and their families. It should boost consumer confidence in food. It should encourage the creation of a diverse range of small-scale food related businesses which can work with their local communities to support a healthy local economy. Nourish is aware that the current EU Foodlinks programme is drawing to a close. This has been a useful programme and we believe that there is scope for the EU To continue to fund EU wide networks which would facilitate the exchange of ideas and best practice and encourage pan-european learning.</p>
<p>Please give details of how you are, or would, implement your preferred option/s. -open reply- (optional)</p>	<p>We need to exploit the capacity of new technologies to provide information at the point of buying and to allow citizens to access information about where food comes from and how it is made. This could include the use of QR codes to provide information about how sustainable a product is. Technology could also be used to support shorter supply chains, and could be used to support citizen buying groups and to aggregate demand. This could also support better distribution arrangements and reduce waste and excess ordering.</p>