

To the Chair of the AGRIFAO Working Party
Mr Jose Luis Coelho Silva

To the representatives of EU member states in the
AGRIFAO Working Party

Copy: Council Secretariat LIFE 3 FAO
Mr. Leonard Mizzi

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European Commission

Committee of Development of the
EU Parliament (DEVE)
Committee of Agriculture of the
EU Parliament (AGRI)

16 April 2021

Re: Council Conclusion on the United Nations Food Systems Summit

Dear Ministers of Agriculture,

Dear Mr Jose Luis Coelho Silva,

Dear Member States Representatives,

As the European Union is still discussing the Council Conclusions concerning the United Nations Food Systems Summit (FSS), we have the pleasure to write to you to highlight a number of elements we expect and hope will be reflected in these Conclusions.

We welcome the draft Council Conclusions of 16 March 2021, in particular the general principles that acknowledge the need for a deep transformation of the way the world produces and consumes food, reiterates the centrality of human rights and small-scale food producers, indigenous people and local communities, the importance to address poverty, inequality and conflicts and the role of social protection to fight hunger and all forms of malnutrition, the need for a greater focus on territorial markets and short food supply chains, the importance of land rights, and of the gender dimension. We also welcome the recognition of the need to embed the Food Systems Summit into the UN institutional framework, recognizing the central role of the Food and Agriculture Organization of the United Nations (FAO) and the Committee on World Food Security (CFS).

However, we believe that the principles set out fail to be translated into the EU Council's priorities, raising questions about the actual intention to effectively support the transformation of our food systems. The reference to agro-ecology is welcome, but could be further strengthened, and adding a reference to the need to scale up scientific research in that regard would be very important.

We would like to raise some elements which we would like to see addressed, and on which the draft Conclusions are either silent, or not explicit enough in our view. We also encourage the inclusion of more robust and ambitious actions and initiatives that the EU will undertake in

the coming years to move as quickly as possible towards a fair, healthy and environmentally friendly food system.

1. An acknowledgement that food systems need a deep transformation

There is a lack of explicit reference to the structural causes of “weaknesses and unsustainable trends in the current food systems”. Notably, the major power imbalances in food systems are not sufficiently acknowledged in the draft Council Conclusions. If these power imbalances are not recognised and addressed, the transition towards sustainable and fair food systems will be subject to the vested interests of those holding power. Such transition is not going to happen at the scale needed, or is going to take too much time - a time we do not have in light of the rising hunger, inequality, poverty and the urgency of the climate and biodiversity crises.

We therefore suggest to include an express recognition of the excessive power concentration in global food systems, the need to address it through regulation on the one hand, and a much firmer support to small scale producers’ organisations and cooperatives to strengthen their collective weight on the other. As changing these power imbalances is going to be difficult and will require a combination of actions, we call upon the EU to explicitly recognize this issue as a priority to transform food systems. This needs to be done by integrating it into the existing action tracks of the UNFSS, or by the establishment of an additional Action Track in the FSS on the transformation of corporate food systems, echoing thereby the demand of the [People’s Autonomous Response to the FSS](#).

We also believe more attention should be paid to the need to ensure that multilateral and bilateral trade agreements do not jeopardise or contradict the efforts to move away from a food system that is incompatible with planetary boundaries and with the needed support to territorial approaches. The recent commitment in the new EU Trade Policy to have a dedicated chapter on sustainable food systems in trade agreements is a timid step towards recognising that trade and investment liberalisation have detrimental impacts on small-scale food producers, local and territorial markets, the right to seeds and the right to food. The draft conclusions also fail to recall the principle of Policy Coherence for Sustainable Development. Pretending trade can contribute to protecting the environment without acknowledging the fact that an ever-expanding global trade in food and agricultural commodities is incompatible with the 1.5°C scenario would be a gross negligence at this stage. International trade in food and agriculture needs deep rethinking.

All investments need to comply with environmental and human rights standards, be they public or private. When private investments are subsidised with public funds (blending, grants for private companies), there should be a much stronger focus on sustainable and inclusive business models, such as cooperatives, social enterprises and associations of small-scale producers themselves, particularly women. This is particularly valid in the food and agriculture sector, where these businesses are very active. Public funds should support models that are already sustainable, rather than companies that are not even integrating the cost of environmental and social compliance in their business models, let alone ensuring their compliance. Using public funds to cover the externalities of business models primarily geared at privatising profits for their shareholders is not going to allow an actual transition towards sustainable and fair food systems. Additionally, there is no evidence that blended finance is an appropriate instrument in the field of agriculture and food production in low-income countries.

While food labelling initiatives are important and welcome, they are putting the onus on consumers - as can be the case for food losses and waste, and will not suffice to create an enabling food environment. It is important to acknowledge that such initiatives are only a tiny parcel of the broad and diverse range of ambitious measures to be put in place in order to

start the transition towards sustainable and fair food systems. Moreover in order to be effective, these labelling initiatives should be participatory and lead to a better connection between consumers and producers.

The carbon farming initiative may help in terms of carbon accounting, but will not actually reduce emissions, and may go together with huge risks in terms of equity. We call upon the EU to support solutions that will actually deeply transform our food systems by addressing its structural causes, rather than false solutions which in fact allow the continuation of the current flawed model.

Last but not least, we encourage the Council Conclusions to acknowledge that diets in rich countries need to shift towards less consumption of animal products, and that the reduced amount of animal products consumed need to be produced in the respect of animal welfare. We welcome the reference to zoonotic diseases, but consider that an express reference to the need to phase down industrial animal farming should be recognised, as this model is incompatible with animal welfare, increases the risk of zoonotic diseases and drives biodiversity loss. We would like to emphasise that improved animal welfare is positively linked with all of the UN SDGs and that production systems with the potential to provide higher animal welfare are also more likely to have less negative impact on the environment, the climate and livelihoods.

2. The centrality of human rights in the approach and objectives of the Summit

The deep transformation of food systems cannot be accomplished without putting human rights and rights holders at the center of the process. The realization of the right to food must be at the center of the FSS. Unfortunately, it seems that this approach is lacking in the process of the UN Food Systems Summit as highlighted by the last three UN Special Rapporteur on the Right to Food⁸. We consequently welcome the fact that the draft Council Conclusions promote the centrality of the international human rights framework in the Summit, and advocate for the transformation of food systems to be embedded in human rights. This approach needs to be translated into the priorities, reminding the need to respect, protect and promote human rights, and the importance of participation, transparency and accountability. A human rights approach should lead to recognise the roles and responsibilities of rights-holders, duty bearers and third parties in transforming our food systems.

We would therefore suggest putting more emphasis on the central role and agency that local communities, small-scale food producers and family farmers, indigenous peoples, and other marginalised communities, are playing to build resilient food systems. A clear commitment to support them financially and politically, including through finance for climate adaptation, would be welcome in the part “Follow-up to the Summit”. The realisation of women’s rights should be expressly pursued in that framework. The “actionable agenda” that the EU expects the Summit to deliver needs to be grounded in human rights.

3. The governance of food systems

The UN Food Systems Summit raises another major concern amongst civil society and producers' organizations: the global governance of food systems. The Summit is based on a multi-stakeholder approach that lacks democratic legitimacy and clear accountability rules. While we acknowledge that small-scale food producers, indigenous peoples, women and workers in food value chains and other civil society groups are invited to engage proactively in the Summit process, via the Action Tracks and the national and informal Food Dialogues, we also recognize that this is far from enough and that many organisations and social movements feel that the terms of engagement need to be clarified. We call on the EU to be

more decisive and proactive in ensuring that the process 1) addresses inequality and power imbalances, 2) respects a human rights approach where rights-holders are at the center of public policies and can claim their entitlements and 3) clarifies who is in control of taking decisions and by what procedures decisions are made.

The EU should demand the establishment of robust safeguards against conflicts of interest in all bodies and processes of the FSS, to ensure the centrality of public interests over private interests. We also consider that the partnership between the UN and the World Economic Forum – the forum of the wealthiest and most powerful companies on earth – generates such a distrust among the people and the CSOs representing them that the EU should call for a different governance of the FSS, reprioritising the voices of the most marginalised and vulnerable food producers and consumers.

The CFS and the Rome-based agencies need to play a central role in the preparations of the Summit, during the Summit, and after the Summit. No alternative bodies should be established which would drain resources away from existing legitimate bodies, including the High-Level Panel of Experts and the Civil Society and Indigenous Peoples Mechanism of the CFS. We call on Europe to defend these institutions.

The current draft Council Conclusions do not recognize the CFS as the foremost inclusive international and intergovernmental policy platform on food security and nutrition promoting policy coordination, convergence and coherence to realise the Right to Adequate Food. The Conclusions now mainly refer to the CFS in the interface between science and policy, but not as the foremost policy platform, which should also be in charge of the follow-up of the Summit. In that regard, the draft Conclusions refer to multi-stakeholder partnerships and a string of conferences and summits. We do not believe this is the right way forward and call upon Member States to take their responsibilities rather than rely on businesses and codes of conduct to solve the life-threatening crisis generated by an over-reliance on the markets and private sector. The “actionable agenda” highlighted in the follow-up to the summit should be monitored by the CFS.

We thank you for your attention and remain available for further discussion would you consider it useful.

Yours Sincerely,



With the support of CONCORD, the European Confederation of Relief and Development NGOs

