



CONSEIL CONSULTATIF POUR
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NWWAC recommendations in response to the public consultation “Sustainable food system – setting up an EU framework”

21 July 2022

Background

The North Western Waters Advisory Council (NWWAC) welcomes the initiative on a Sustainable Food System EU Framework. The biodiversity and climate crises must be the priority of the upcoming food system transformation and drive future directions in food production and consumption practices. In the last decades, EU policies affecting food systems have mostly been developed in isolated silos, leading to gaps and inconsistencies. Therefore, common, coherent goals and policy actions can help achieve the transition to sustainable, socially fair and healthy food systems for current and future generations.

The following advice has been developed by the NWWAC Focus Group Climate & Environment in support of the response to the questionnaire on the public consultation “Sustainable food system – setting up an EU framework”.

Recommendations

- **The fisheries sector specificities must be considered when developing tools for transforming food systems:** Fisheries need to be considered as an integral component of "food systems", encompassing production systems, their environments, post-harvest value chains, consumer behavior and diets. When developing a common approach to sustainability aspects, including the introduction of sustainability objectives and principles, it is important that the potential need for sector-based approaches for the fisheries sector is taken into account. Indeed, the sector is characterized by significant variety in species, production methods and techniques, production regions, data availability on stocks status, and specific control and enforcement done at sea. The NWWAC believes that the framework should also consider fisheries-specific issues in connection with the problem of food waste, such as the ban on discarding in fisheries, traceability requirements and IUU fishing products entering the EU market.
- **Future food systems must work for both people and nature:** The NWWAC strongly recommends respecting the concept of sustainability provided by the Common Fisheries Policy (Art. 2.1), which covers the three pillars of sustainability: environmental, social and economic. There remains a growing need for considering both fisheries and fishing communities as part of social-ecological systems. The implementation and operationalization of a holistic ecosystem approach to fisheries management, including socio-economic dimensions, is critical to secure long-term availability of seafood as well as resilience of coastal communities.
- **Food systems need to be transformed well-beyond the conventional food sector:** The establishment of a sustainable food system should take into account the interaction between



land and sea ecosystems. Land-based pollution of industrial and agricultural origin, including nutrient and wastewater pollution, which is introduced into the sea via waterways, can produce severe impacts on marine ecosystems, such as eutrophication. Food production and other industrial activities on land should be limiting these pressures as much as possible. There is nothing sea-based food sectors can do to mitigate pressures coming from other sources that have been so far disregarded by food system-related policies.

- **Flexibility must be the guiding principle for all food system-related policies to ensure resilience and adaptation:** In order to establish a resilient, sustainable food system framework, it is crucial that such framework is flexible and adaptive to face changes in future circumstances. Resilience-focused policies can better position a food system to withstand crises like natural disasters and conflicts. With climate-related shocks and stressors adding to existing hazards facing food systems, this is a critical time to examine food system vulnerabilities and work to ameliorate them. Robust systemic risk assessment, normative guidance and integrated risk management tools for capacity strengthening are key elements in this regard.
- **Sustainability and competition policies must go hand in hand:** The current economic performance of the Union shows that more incentives to sustainable production are needed. Increasing restrictions without unleashing new economic opportunities will only negatively affect the EU market and increase imports from countries with lower environmental and social standards. Ensuring the Union's competitiveness in the world is crucial for the Union to shift towards truly sustainable food systems, and not just outsource unsustainable business models. Therefore, Europe needs to be a leader on both sustainability and competition regulations, as these two crucial priorities are interdependent in the long-term. EU standards can play a key role in ensuring a level-playing field especially in relation to seafood imports and exports. At the same time, it is important to consider how to avoid putting a burden on the Global South and drive unequal access to markets, for example by building capacities and exporting best practices in sustainable food production practices in the context of developing countries.
- **A clear overview of what is expected by whom for an effective food system transformation is needed:** The transition to a more just and sustainable food system needs to be coordinated at multiple levels of governance and involve a range of actors in both land-based and marine environments. The NWWAC recommends identifying and distributing clear responsibilities among authorities (EU, national, local) and actors (consumers, retailers, producer, processors, etc.), ensuring a coordinated approach.
- **The food system transformation can only be acceptable if socially just:** Addressing social inequality is essential to building a sustainable food system. Future developments in food systems need to consider differences among consumers and producers, that also stem from economic, social and cultural inequalities thus driving different capacities in food production and consumption choices. What must be avoided is a food system that works only for the wealthy.



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- **Seafood can contribute to climate-friendly and nutrition-sensitive diets if properly managed:**
The NWWAC wishes to highlight the key role of sustainable fisheries products in sustainable consumption and healthy nutrition habits. A sustainable European fishing industry produces a low carbon, high-value protein for consumers, compared to other animal protein producing sectors, and highlight the importance of promoting seafood as part of sustainable, climate-neutral food consumption.

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