EUPHA supports a new ambitious Farm to fork strategy and emphasizes it’s potential to transform food systems and address the social and financial burden of NCDs in EU.¹

We would like to support a preparation of a new Farm to fork strategy with a short review of public health recommendations which relate to a whole chain from farm to fork covering perspectives of reducing environmental contamination and antimicrobial resistance (AMR) to increasing access to healthier diets and tackling livestock implications.

As a scientific organization EUPHA can contribute to the evidence base for transforming our food systems (e.g. through the peer-reviewed European Journal of Public Health) and we provide a platform for the public health community in Europe (e.g. the annual European Public Health conferences, attended by over 2000 public health professionals).

To reach overall targets of EU Green deal, as well as to tackle NCDs, we need ambitious time-bound targets which are not voluntary based and take precautionary principle seriously. From an economic perspective promotion of healthy diets costs a lot of public money and has very low cost-effectiveness, if we don’t change our food environments. Healthy products have to become more attractive and more physically and financially available than unhealthy products.

The appropriate policy interventions to change behaviour have to be context specific and include agricultural research to increase fruit and vegetable cultivation; increase taxes on sugar, sweeteners and fat to reduce the prevalence of obesity; implement regulations for advertising and promotion; and systemize education about nutrition.² The Lancet Commission warns that the policy responses from national governments to global syndemic (obesity, undernutrition and climate change) have been slow and inadequate. This policy inertia stems from the reluctance of political decision-makers to implement effective policies, powerful opposition by vested commercial interests, and insufficient demand for change by the public and civil society.³

Researchers estimated that adopting different healthy diets could avoid around 11 million deaths per year in 2030 and reduce premature mortality by 19%.⁴ A future-looking CAP should focus more on financially stimulating both the demand and supply of foods for healthy and sustainable diets, such as fruit and vegetables, pulses and nuts, on creating markets for these products, and by fostering social innovation in food supply chains.⁵ Current policies have fewer nutritional impacts than they could if they included nutrition among their primary objectives.⁶ Inter-ministerial mechanisms

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¹ Alliance, “Joint Letter I Farm to Fork Needs an Effective Consumption Strategy - EPHA.”
² FAO, Food Systems for Better Nutrition.
³ Swinburn et al., “The Global Syndemic of Obesity, Undernutrition, and Climate Change.”
⁴ Willett et al., “Food in the Anthropocene.”
could be put in place to bring together all relevant ministries (agriculture, environment, health, education), coupled with mechanisms to consult with different stakeholders, potentially as a step towards developing national food policies.\footnote{From Uniformity to Diversity: A Paradigm Shift from Industrial Agriculture to Diversified Agroecological Systems.}

Five co-dependent leverage points can be identified for building healthier food systems: 1) promoting food systems thinking at all levels; 2) reasserting scientific integrity and research as a public good; 3) bringing the positive impacts of alternative food systems to light; 4) adopting the precautionary principle; 5) building integrated food policies under participatory governance.  

**Sugar quotation system** should stay to prevent sugar prices from dropping and it should also be excluded from the voluntary coupled support option in the Direct Payments Regulation. The sweetener market should not be fully liberalised as long as no EU-wide regulatory framework exists to internalise health costs into the price of artificially sweetened products, e.g. through fiscal measures.  

\textbf{Taxing sugar sweetened beverages (SSBs)} can lower consumption and encourage reformulation. It can reduce obesity, type 2 diabetes and tooth decay, especially for lower-income, less-educated and younger populations. Evidence shows that a tax on SSBs that increases the prices by 20\% can reduce consumption by around 20\%.\footnote{WHO, “Taxes on Sugary Drinks: Why Do It?”}

More sustainable set of policies might include using any promotional budgets that are justified to educate consumers about the benefits of produce which both contribute to a healthy diet and are made to high standards (organic, high welfare, pasture-fed etc), and stop using them in ways which promote extra consumption of domestic production per se.\footnote{Baldock and Mottershead, “Towards an Integrated Approach to Livestock Farming, Sustainable Diets and the Environment: Challenges for the Common Agricultural Policy and the UK.”} Fiscal measures need to be allied with greater education about our food and farming decisions at all ages and in all sectors of society, particularly through school curriculum.  

To decrease attractiveness of unhealthy products we need a more comprehensive Audiovisual Media Services Directive to \textit{limit digital marketing to children.}\footnote{WHO, “Tackling Food Marketing to Children in a Digital World: Trans-Disciplinary Perspectives.”} We also need to limit marketing elements on food packaging targeting children (like cartoon characters) and \textit{tackle commercial foods for infants.}\footnote{“Commercial Foods for Infants and Young Children in the WHO European Region. Policy Brief on Two New Reports by the WHO Regional Office for Europe (2019).”}

The EU institutions should publicly acknowledge the need for action on meat production and consumption and \textit{stop support for industrial livestock production} through CAP subsidies (no rural development funds to be used for the construction of new factory farms) and instead support sustainable small-scale livestock producers distributing their products in short food supply chains and

\textit{Anderson et al., “Unravelling the Food–Health Nexus: Addressing Practices, Political Economy, and Power Relations to Build Healthier Food Systems.”}  

\textit{Pushkarev, “A CAP for Healthy LivingMainstreaming Health into the EU Common Agricultural Policy.”}  

\textit{Allen, Bas-Defossez, and Weigelt, “Feeding Europe: Agriculture and Sustainable Food Systems.”}  

\textit{WHO, “Tackling Food Marketing to Children in a Digital World: Trans-Disciplinary Perspectives.”}  

\textit{“Commercial Foods for Infants and Young Children in the WHO European Region. Policy Brief on Two New Reports by the WHO Regional Office for Europe (2019).”}
for the local market. All livestock products should be removed from the voluntary coupled support option in the Direct Payments Regulation to relocate funds to targeted programmes under the Rural Development Regulation in order to support regions in which livestock keeping is vital for socio-economic reasons. Clear and mandatory standards should be introduced to ensure that meals paid for by taxpayers in schools, hospitals, care homes, and all government departments reflect environmental and health factors, relying on less but better meat and dairy which could be achieved by introducing clear green food procurement standards. Policy proposals should include measures to discourage consumption of livestock products harmful to health and environment, and to encourage consumption and production beneficial to health and environment.

Diets should be based on many varieties of natural or minimally processed foods mainly of plant origin to address an extensive list of the environmental and societal impacts of animal-based foods from global warming, deforestation, intensive use of water and contamination of groundwater to generating diseases in animals that can be transmitted to humans. The environmental impacts of food and farming systems threaten human health through a variety of pathways. For example, agriculture is responsible for some 90% of EU ammonia emissions – a major contributor to the air pollution that kills 400,000 Europeans each year. Exposure to endocrine disrupting chemicals (EDCs) via foods, food packaging; agricultural contamination of water sources and AMR also generate major health externalities.

Recommendation are to reduce unnecessary use of antimicrobials in agriculture and their dissemination into the environment. A ban on nontherapeutic antibiotic use (e.g. a ban on the use of all antibiotic growth promoters in animals) would help to limit additional damage and open up an opportunity for better preservation of future antimicrobials in an era when their efficacy is gravely compromised and few new ones are in the pipeline. Certain antibiotics need withdrawal from veterinary medicine and specific classes of antibiotics should be reserved for human use. The need for therapeutic drugs would minimize if monitoring of aquaculture and animal husbandry welfare practices would increase and infection prevention and control including the increased use of vaccination to prevent disease. Aquaculture facilities should be positioned distant from wild fish populations, to prevent dissemination of resistance genes. Other important measures are also limiting antibiotic use for treatment in bee-keeping and a ban on antibiotic use in horticulture. The latest report in 2019 from European Surveillance of Veterinary Antimicrobial Consumption shows that sales of antibiotics for use in animals in Europe fell by more than 32% between 2011 and 2017. The report from 2017 shows that in many EU sales have dropped by more than 5%, which means there is also a potential for a decrease in other countries.

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15 “Meat Atlas.”
16 Buckwell and Nadeu, What Is the Safe Operating Space for EU Livestock?
17 “Plates, Pyramids, Planet - Developments in National Healthy and Sustainable Dietary Guidelines: A State of Play Assessment.”
18 Karamichalis, “Towards a Common Food Policy for the European Union.”
20 Meek, Vyas, and Piddock, “Nonmedical Uses of Antibiotics.”
21 Anonymous, “European Surveillance of Veterinary Antimicrobial Consumption (ESVAC).”
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The European Public Health Association, or EUPHA in short, is an umbrella organisation for public health associations in Europe. Our network of national associations of public health represents around 20’000 public health professionals. Our mission is to facilitate and activate a strong voice of the public health network by enhancing visibility of the evidence and by strengthening the capacity of public health professionals. EUPHA contributes to the preservation and improvement of public health in the European region through capacity and knowledge building. We are committed to creating a more inclusive Europe, narrowing all health inequalities among Europeans, by facilitating, activating, and disseminating strong evidence-based voices from the public health community and by strengthening the capacity of public health professionals to achieve evidence-based change.

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