

To: European Commissioner Janusz Wojciechowski

CC: European Commissioner Stella Kyriakides

CC: Lukas Visek, Annukka Ojala, Agnė Razmislavičiūtė-Palioniene

The Common Agricultural Policy needs a stronger nutrition dimension to align with the EU's new policy framework for food systems

Brussels, 3 September 2020

Dear Commissioner Wojciechowski,

In view of the ongoing reform of the Common Agricultural Policy (CAP) and the European Union's (EU) new framework governing food systems, the undersigned organisations **urge you to enhance the role of nutrition in agricultural policy-making.**

Already in its Communication 'The Future of Food and Farming' the Commission committed to make "nutritious valuable products such as fruit and vegetables easily available for EU citizens".¹ The current CAP proposal introduces a new specific objective to advance "nutritious and sustainable food".²

More recently, the European Green Deal and its component strategies have established a new framework for EU's food and agricultural policy, which emphasises consumption as a key determinant of food sustainability. **Promoting healthier diets with more fruit and vegetables, whole grains, legumes and nuts and less meats, and the need to reverse overweight and obesity by 2030,** are core pillars of the Farm to Fork Strategy.³

Likewise, Europe's Beating Cancer Plan, an upcoming flagship EU initiative, recognises unhealthy diet as a key and highly preventable risk factor for cancer and other non-communicable diseases (NCDs), such as cardiovascular disease and diabetes.⁴ NCDs are overwhelmingly responsible for the EU's burden of ill-health and mortality, and represent over 700 billion EUR in healthcare spending each year. Moreover, the probable links between diet and immune system functioning⁵ and obesity as aggravating factor⁶ have received significant attention in the context of COVID-19.

However, despite existing policy declarations, we are concerned about the persistent lack of attention to the role the CAP can play in promoting healthy, sustainable nutrition and to the absence of a strategic assessment of the economic, social, environmental and food security co-benefits that nutrition-oriented supply chains can deliver.

For instance, while the current CAP proposal commits to addressing nutrition, no new instruments and no nutrition-relevant indicator were included to facilitate the achievement of this commitment. Likewise, the Commission's briefing on CAP specific objective (i) is limited to antimicrobial

¹ [The Future of Food and Farming, COM/2017/0713](#)

² [Article 6 \(i\) CAP Strategic Plans Regulation](#)

³ [A Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system, COM/2020/381](#)

⁴ [European Commission, Non-communicable diseases, Cancer](#)

⁵ [World Health Organization, Healthy at home: Healthy diet](#)

⁶ [Curtin et al. \(2020\) COVID-19 and Morbid Obesity: Associations and Consequences for Policy and Practice. WMHP](#)

resistance (AMR), despite the objective's wider scope.⁷ Moreover, the recent analysis on the consistency of the CAP with the European Green Deal **does not feature any substantive reflections on whether the proposal's design allows it to effectively contribute to diet and nutrition objectives.**⁸

To remedy this state of affairs, we suggest the following three actions.

1. **Add a nutrition indicator to guide CAP Strategic Plans.** With the CAP reform still ongoing, the Commission can adjust the Regulation to enhance its nutrition dimension. This can be achieved by adding a nutrition-related impact and/or result indicator into Annex I of the CAP Strategic Plans Regulation. An appropriate aim for such new indicator would be to increase the supply of, and access to fruit and vegetables. Member States could report their achievements on the basis of projects supported in which increasing fruit and vegetables, as well as whole grains, pulses and/or nuts, figure as a prominent aim.

Such addition would provide a clear incentive to align the national implementation of the CAP with efforts to promote healthy, sustainable food consumption patterns in accordance with the Farm to Fork Strategy. In the current proposal, the nutritional dimension is too easily overlooked.

2. **Recommend the use of CAP instruments to create nutrition-sensitive supply chains.** While the CAP has a patchwork of instruments that could be used to advance nutrition-sensitive supply chains in line with the Farm to Fork Strategy, such instruments are not always readily identifiable or implemented with nutrition in mind.

To ease Member States' task, the Commission's upcoming recommendations on CAP specific objectives⁹ should include a dedicated section analysing how the policy's existing instruments could be used to strengthen supply chains for healthy products and promote health-oriented business models. The investment opportunities under the rural development pillar deserve special attention, given their potential to yield local economic co-benefits. This, for instance, through the development of local market infrastructures for fresh produce, enhancing urban to peri-urban supply chain linkages, establishing innovative business models involving improved access to healthy products, and so forth.

3. **Launch a comprehensive evaluation of the CAP's impact on and contribution to public health.** Despite large numbers of academic studies describing linkages between agriculture, food systems and health, and the obligation in the EU Treaties to ensure a high level of human health protection in the design and implementation of all policies,¹⁰ there has, to date, not been a comprehensive evaluation of the impact of the CAP on public health in all of its dimensions.

Such evaluation should be launched and it should include an assessment of the relationship between agricultural policy, food environments and dietary patterns. This will allow to improve the CAP going forward to make sure it makes full use of its potential to support human and planetary health.

Looking forward to an opportunity to discuss these proposals with you,

⁷ [European Commission, CAP Specific Objectives ... explained – Brief No. 9](#)

⁸ [Commission Staff Working Document, Analysis of links between CAP Reform and Green Deal, SWD\(2020\) 93](#)

⁹ Action number 3 in the Annex to the Farm to Fork Strategy, due in Q4 of 2020.

¹⁰ Article 168(1) TFEU

Sincerely yours,

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Dr Wendy Yared, Director, Association of European Cancer Leagues (ECL)
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Emma Woodford, Chief Operating Officer, European Oncology Nursing Society (EONS)
Floriana Cimmarusti, Secretary General, SAFE – Safe Food Advocacy Europe

Association of European Cancer Leagues (ECL) – ECL provides a unique platform as the only non-profit, pan-European umbrella organisation with the mission of uniting, at the European level, national and regional cancer leagues to achieve a cancer-free Europe. Active since 1980 and located in Brussels, ECL currently has 29 members from 24 countries in the European Region, covering 21 EU member states. ECL's members are cancer charities operating across the whole portfolio - from cancer research and awareness to patient support during and after diagnosis. Cancer leagues are often the main resource for the public for cancer control information and services. ECL's mission is to influence and improve cancer control and cancer care in Europe. This is done by providing a forum and voice for experienced charities and supporting new entrants facilitating collaboration and knowledge sharing, primarily in the areas of cancer prevention, tobacco control, access to medicines and patient support, as well as creating opportunities to advocate for these issues at the EU level. | <https://www.europeancancerleagues.org/>

European Heart Network (EHN) - EHN is a Brussels-based alliance of foundations and associations dedicated to fighting heart disease and stroke and supporting patients throughout Europe. The EHN plays a leading role in the prevention and reduction of cardiovascular diseases, in particular heart disease and stroke, through advocacy, networking, capacity-building, patient support, and research so that they are no longer a major cause of premature death and disability throughout Europe. | <http://ehnheart.org/>

European Medical Students' Association (EMSA) – EMSA represents medical students across Europe. EMSA is committed to ensuring the highest standards of healthcare and medical education in a united Europe by empowering medical students to advocate health in all policies, excellence in medical research, interprofessional healthcare education and the protection of human rights across Europe. | <https://emsa-europe.eu/>

European Oncology Nursing Society (EONS) - The European Oncology Nursing Society (EONS) is a pan-European membership organisation for cancer nurses – the largest group of healthcare workers in the oncology workforce. EONS provides leadership in all areas of cancer nursing: research, practice, continuing education, communications and advocacy for better recognition of cancer nursing across Europe. Our vision is that cancer nursing will be recognised by the cancer community, national and European level policy makers, as a profession with specialised training and qualifications available across the continent. | <https://www.cancernurse.eu/>

European Public Health Alliance (EPHA) – EPHA is a leading European NGO alliance advocating for better health. A member-led organisation made up of public health NGOs, patient groups, health professionals and disease groups, we work to improve health and strengthen the voice of public health in Europe. As part of its priorities EPHA advocates for policies to tackle the common risk factors to non-communicable diseases (NCDs), and advance a transition towards resilient, sustainable food systems with health-enabling food environments. | <https://epha.org/>

SAFE – Safe Food Advocacy Europe – SAFE is a non-profit independent organisation based in Brussels whose main objective is to ensure that consumers' health and concerns remain at the core of the EU food legislation. To date, our membership collectively represents the voice of more than 2.500.000 European consumers. | <https://www.safefoodadvocacy.eu/>