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European Food System Framework Initiative

The position of FEBA and its members

This paper aims to communicate in a concise manner the position of the European Food Banks Federation (FEBA) and its members on the key components of the Sustainable Food System Framework Initiative proposed by the European Commission. It builds on the information transmitted through the corresponding [Inception Impact Assessment](#).

In a world challenged by a growing population and the simultaneous scarcity of resources aggravated through climate change, sustainability enshrined as a mantra for production and consumption of goods is crucial. When it comes to food, while being of special relevance, this notion seems not yet incorporated sufficiently.

Globally, 1.3 billion tonnes of food are wasted every year and 20% of the total food produced in the EU is lost or wasted along the food supply chain every single year ([FUSIONS, 2016](#)). Food waste is a huge environmental problem, with 8% of greenhouse gases produced by food rotting in landfills. At the same time, 36.2 million people cannot afford a quality meal every second day ([Eurostat, 2020](#)).

The COVID-19 pandemic first and the conflict in Ukraine now have made it urgent to find a solution to this paradox. In addition, it is evident that this paradox is not in line with the concept of sustainable food systems, which must be characterised by environmental, social, and economic sustainability in order to respond to the demands of all actors of the food system, from farm to fork. Fostering the transition towards a sustainable food system requires the consultation and involvement of relevant stakeholders having the necessary competence. This is where Food Banks of the FEBA network come in, playing a unique role in implementing the notion of circularity and therewith playing a key role as game-changers by tackling the paradox of scarcity in abundance.

Since we live in a complex environment characterised by inextricable links and dependencies, the connection between food sustainability, food safety, and food security is crucial. However, especially the latter is increasingly fragile given the three interrelated crises of climate change, the COVID-19 pandemic, and Russia's full-scale invasion of Ukraine. Together, they create the perfect storm of crippling supply chains, skyrocketing inflation rates, and spiralling costs of living. These developments, particularly the war in Ukraine, have triggered a shift of priorities and put food security and the resilience of the global food system at the centre of the political agenda. It could be argued that when the primary concern is to put food on people's plates, the way it is produced fades into the background. Sustainability, nonetheless, should not be considered a barrier but rather a lever to achieving and maintaining food



security, now and in the long term, because it fosters the agility, elasticity, and diversity of the food system which is crucial to make it overcome market failures and shocks. Therefore, the implementation of key EU sustainability flagships, such as the Farm to Fork Strategy and its featured measures, should be pursued as eagerly as before the outbreak of the COVID-19 pandemic and the war in Ukraine, while ensuring that it does not provoke additional burdens.

Following this notion, it is important to reiterate that the current three-fold crisis has a severe impact on society and especially on its most vulnerable groups that, once again, are hit the hardest. Given that, the individual components of the Sustainable Food System Framework Initiative put forward by the European Commission must be seen in a light different to the circumstances before the outbreak of the war in Ukraine and the repercussions resulting from that.

FEBA and its members would highlight the following core aspects:

- Preventing food waste improves the resilience of the food supply chain, helps our planet, and contributes to food security. Each food item rotting on the field or going to landfill equals the waste of resources, such as water or land, and additionally produces greenhouse gas emissions fostering climate change. Hence, food loss and waste can never be sustainable, which calls for the necessity to put it in the spotlight of the initiative.
- Due to their core activity, i.e. recovering and redistributing safe and edible surplus food to charitable organisations providing food assistance to people in need, Food Banks are an integral part of a more sustainable, healthier, and equitable food system for all. Through the recovery of surplus food, market failure and production inefficiencies are absorbed and food waste prevented while food insecurity can be reduced through the redistribution of food as a gateway to social inclusion. Therefore, supporting and easing the activity of Food Banks should be considered as a relevant measure to speed up the shift towards a sustainable food system.
- By the same token, public funding on national and/or EU level is crucial to allow Food Banks to scale up their operations and become more efficient. Their role as relevant sustainability promoters must be recognised and rewarded, especially during times of economic hardship caused by rising running costs.
- A horizontal framework law, such as foreseen in the Sustainable Food System Framework Initiative, to accelerate and facilitate the transition towards sustainability should include provisions incentivising and fostering food donation as an effective instrument to prevent food waste. It is not only a business friendly, beneficial solution but also an environmentally sensitive and socially responsible alternative, offering a win-win solution to handle the occurrence of surplus food, for the people and for the planet. Therefore, it can be considered as a key part of a food system resting on all three pillars of sustainability.



- The current patchwork quilt of legislation and voluntary approaches existing across the EU leads to fragmentation. In Member States where no regulation is in place, the food use hierarchy can be disregarded, and the activities of Food Banks hampered. Thus, a regulation at Union level can not only foster cohesion but also align the opportunities of Food Banks to recover and redistribute large quantities of nutritious surplus food of high quality, which enables the end beneficiaries to stick to a balanced diet.
- Although the provision of sustainability-related information to consumers, e.g. through product labelling, is important, when these items are not affordable for a large share of society, the relevance of such a measure decreases. According to current developments and forecasts, the prices for food are likely to further increase, making it even more difficult for those with little or no income to afford food. The ability to select products according to their sustainability becomes a luxury out of reach for many. Thus, in order to nonetheless exploit the benefits of consumers' decision power, food items that are favorable for human and planetary health should be subject to reduced VAT to ensure their accessibility. It therefore takes the willingness and capability of national governments to foster equality while promoting the transition towards a sustainable food system.

Achieving a sustainable, resilient, inclusive EU food system that incorporates the concept of *building back better* after the three-fold crisis of the climate change, the COVID-19 pandemic, and the war in Ukraine must be more than wishful thinking. The journey towards it can only be successful if all stakeholders are convinced of its necessity, work together, and pool their resources. As a member of the Advisory Group on Sustainability of Food Systems (AGSFS) operated by DG SANTE of the European Commission, FEBA is eager to collaborate with the other actors involved to foster the establishment of a sustainable EU food system that, particularly in times of crises, leaves no one behind.

About the European Food Banks Federation

The European Food Banks Federation (FEBA) is a European non-profit organisation and works in collaboration with 24 Full Members and 6 Associate Members in 30 European countries. Since 1986, FEBA's mission has consisted in representing its membership at European and international level; supporting and strengthening Food Banks in Europe by providing training, sharing best practices and knowledge, establishing partnerships; and fostering the creation and development of new Food Banks. FEBA brings together a network of Food Banks which are committed to prevent food waste and to reduce food insecurity.

In 2021, the 341 Food Banks belonging to our membership redistributed 907,280 tonnes of food to 45,810 charitable organisations providing food assistance to 11.8 million most deprived people thanks to the professionalism of 39,781 co-workers (83% volunteers). In addition to surplus food from the food supply chain, FEBA Members also redistribute food from the Fund for European Aid to the Most Deprived (FEAD) and the EU Fruits and Vegetables withdrawal scheme, as well as from individual and corporate food collections.