Dear Commissioners,

Representing a group of 11 Brussels-based organisations, the European organisations of the livestock chain welcome the European Commission’s ambition to transform our current agri-food system through the Green Deal and more specifically the Farm to Fork strategy. As responsible actors linked to livestock farming, the whole chain is willing to drive changes towards greater sustainability. The livestock sector is hotly debated when it comes to sustainable food systems, therefore our voice needs to be heard. We have both a duty and the means to contribute to the European Commission’s objectives.

The first Farm-to-Fork thinking at EU level started in the early 2000s, triggered by food and feed safety reasons, making a move away from the silo mentality and taking a more holistic approach. European animal-source products are known worldwide for their safety and quality, their high animal health and welfare standards, the excellence in animal breeding, including new breeding technologies, animal nutrition and better and more efficient use of resources. We fully support a renewed Farm-to-Fork thinking focusing on sustainability.

Environmental rules have become more stringent and our companies and farmers have already achieved great progress in reducing GHG emissions from the EU livestock sector below 6% of the EU’s total GHG emissions. ¹Our ambition is to remain the engine of employment and economic vitality of rural zones, whilst being committed to greater sustainability to address societal and environmental challenges.

¹ Source: Eurostat, Click HERE
In order to meet these demands, the European organisations of the livestock chain believe that the European Commission’s Farm to Fork Strategy (FtF) needs to take the specificities and assets of the EU livestock value chain that we represent into account.

Our performance will improve...

- by understanding the needs and engaging with all socio-economic partners and public bodies that compose the livestock value chain when it comes to sustainability and circularity of the agri-food system. Livestock production is so much more than just meat, fish, dairy and eggs. The EU livestock sector provides numerous valuable by-products but also services to our society, mainly in rural areas; raw materials / components for the manufacturing of consumer products such as pharmaceutical products, cosmetics, leather, wool and fur products, feed for food producing animals and pet food, biodiesel, porcelain, isolation material whilst preserving rural communities, families, nature and landscapes;
- by maintaining, facilitating and promoting private and public partnerships, across sectors including civil society, for research and innovation in the EU with ambitious research programmes and the appropriate legal frameworks;
- by acknowledging that there is not a one-size-fits-all approach for improvement of sustainable performance of individual operators and therefore by favouring objective-driven legislation vs. prescriptive rules so as to stimulate innovative solutions and allow operators to implement the measures fitting best their specific situation/environment.

with measures built on science, ...

- by fully recognising feed and food safety as an integral part of sustainability in the EU food and feed legal framework;
- by setting transparent and clear peer-reviewed references, and fair and consensual metrics for meaningful impact assessments;
- by acknowledging, promoting and enhancing the benefits of the variety of farming systems in Europe;
- by setting key performance indicators, in particular reduction targets that should be impact oriented, especially for those parameters where no good indicators of performance exist; by setting key and indisputable indicators to evaluate the economic, environmental, animal health and welfare, and social performances of livestock systems
- by developing a systemic approach to address issues and adequately meet societal and environmental needs.

encompassing the three main pillars of sustainability, ...

- by developing a clear definition of sustainability which needs to reflect the FAO concept, including the economic pillar; such a definition would prevent
the proliferation of different schemes and would help to reach a harmonised approach in the EU;  
• by acknowledging that we produce animal products in a very efficient and climate smart way in the EU; the EU livestock sector provides affordable food for EU citizens. Sustainable animal production exported to other countries is also a source of wealth and wellbeing for the EU;  
• by acknowledging and enhancing the benefits of all farming systems in Europe;  
• by ensuring a fair and comparable calculation of environmental footprint, taking into account that:  
  o agriculture is the only sector that can naturally absorb a portion of GHG emissions (grasslands, agroforestry …);  
  o the specificity of methane that does not remain as long in the atmosphere as CO22;  
  o efficient use of manure as natural fertiliser (safeguarding EU soils and biodiversity), possible credits from the use of by-products, and the avoided emissions in the atmosphere, including the recycling of hides and skins into leather and the biogas production.  
• by upholding standards (past and future) that maintain the competitiveness of the EU livestock sector all across Europe and worldwide;  
• by avoiding the externalisation and relocation of production and research and innovation activities to other countries with lower environmental, animal health and welfare, social and safety standards;  
• by keeping in mind, the importance of rural areas and generational renewal in the livestock farming sector and the meat chain;  
• by preserving the primary goal of the CAP which is producing safe food in enough quantity to feed the EU, providing a fair income to farmers and at affordable price for consumers (TFEU, Art. 39).  

promoting balanced and nutritious diets ...  

• by encouraging proper education and information of all consumers categories about the nutritional value of food products versus their nutritional needs; avoiding simplistic approaches, promoting objectivity and tracking false information on this complex issue;  
• by referring to elements that are not controversial from a nutritional viewpoint: animal products are rich in highly digestible protein including essential amino acids, vitamins, trace-elements and other important required nutrients;  
• by acknowledging that sustainable food systems require a fundamental evolution of consumption practices, including education on food storage and preparation, and a balanced diet, optimisation of primary food resources and reducing leftovers at household level;  
• by keeping in mind that enjoyment of animal-source foods, fashion and musical instruments are also part of the Cultural Heritage of Europe.

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2 John Lynch and Michele McCain (Oxford) - https://www.nature.com/articles/s41612-019-0086-4
https://www.oxfordmartin.ox.ac.uk/news/to-meet-paris-agreement-targets-focus-on-warming-not-emissions/
and restoring confidence in the integrity, quality and safety of EU livestock products.

- by ensuring that any new legislative proposal for “Sustainable Food Systems” will be carefully assessed as to not undermine existing animal health, feed and food safety standards;
- by systematically evaluating the extent to which existing and new legislations affect the vulnerability of operators of the livestock chain and consumers/customers to fraudulent behaviour;
- by prioritising facts over opinions and tracking fake information.

To be successful, the Green Deal/FtF strategy needs to be a collective exercise with a fair share of not only benefits, but also efforts. All value chain stakeholders (including consumers), all systems must feel co-responsible and committed in the process so that it can be a fair and win-win exercise, building on legislative acquis (animal health and welfare, feed and food safety, etc.) and objective facts and science. As there is no one solution that fits all, we see it as a long journey requiring frequent evaluations of the performance of legislative and non-legislative initiatives, adapted to knowledge accumulation, innovations and technological developments.

All European agricultural sectors and its diverse production methods must be able to make their contribution in sustainability. In our livestock sectors, we need further investments to make this happen, with your support for consistent, common EU agri-food chain policies.

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<td>1.</td>
<td>Livestock consume 6 Billion tonnes of dry matter, of which 86% are non-edible as human food. <em>Mottet et al., 2018</em></td>
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<td>2.</td>
<td>With more than 90% of water consumed by livestock being ‘green water’ (rainfall), scientists calculate that 1kg of beef would actually remove around 50l of fresh water.</td>
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<td>3.</td>
<td>70% of land used by livestock could not be used for crops (IMS). These areas, which are particularly grasslands, have many environmental advantages. They are reservoirs of biodiversity, protect soils from erosion, filter water and store carbon. <em>Hocquette, Mollier, Darmon, Peyraud, 2019.</em></td>
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<td>4.</td>
<td>While global demand for animal products is growing rapidly in several parts of the world, meat consumption per capita is declining in Europe. In these countries, consumer demands nutritional quality and animal husbandry practices that promote animal welfare and minimize the environmental footprint. <em>Hocquette, Mollier, Darmon, Peyraud, 2019.</em></td>
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<td>5.</td>
<td>In 2017, world meat consumption was estimated at 323 million tonnes. Nearly 47% consumed in Asia (including 27% in China but 2% in India), 19% in Europe (EU and Russia), 13% in North America and 15% in South America, and less than 6% in Africa. <em>OECD-FAO, 2018.</em></td>
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| 6. | In France, the average meat consumption per week is 370 g. More than 2/3 of French people eat less meat than the 500g per week threshold recommended by the PNNS for the prevention of colorectal cancer. *J.Y Mano, M.A.V. Axelos, J.L. Peyraud, P. Dupraz, I. Veissier, B. Allès, F. Pierre, A. Judas, C. Roturier, 2018.*  
In Italy, the 2010-2015 period, the real beef consumption “per capita” was on average equal to kg 10.1 per year and g 27.7 per day. The real consumption of beef is much lower than the apparent consumption. This result underlying the need to consider the real consumption of beef in order to correctly inform doctors, nutritionists and consumers.” *Russo Vincenzo, Rossi Dario, Nanni Costa Leonardo, Trevisi Erminio, 2017* |
7. Animal products (meat, fish, dairy products and eggs) are sources of very high quality protein, easily and quickly assimilated (digestibility rate of 95%) and providing the nine essential amino acids in adequate proportions. Animal products are also important and easily assimilable sources of iron (especially red meat), zinc, calcium (dairy products), vitamins A, B3, B6, D, and the omega-3 fatty acids EPA and DHA (fatty fish). Hocquette, Mollier, Darmon, Peyraud, 2019.

8. Meat is rich in haem iron, the form of iron involved in the promotion of cancer but which is also highly bioavailable and therefore helps to limit iron-deficiency anaemia in children, women and the elderly. J.Y Mano, M.A.V. Axelos, J.L. Peyraud, P. Dupraz, I. Veissier, B. Allès, F. Pierre, A. Judas, C. Roturier, 2018.
The iron in meat present in haemic form is much better absorbed than that present in plants (25% vs. less than 5-10%, AFSSA-CNERNA-CNRS, 2001)

9. It would be key to underline that animal products are the only sources of vitamin B12. Therefore make a major contribution to the intake of these essential micronutrients, especially to the elderly, children and woman of childbearing age who have greater needs. Hocquette, Mollier, Darmon, Peyraud, 2019.

10. Latest Eurostat data (2018) indicate that 36 million people cannot afford a quality meal (including meat, chicken, fish or vegetarian equivalent) every 2nd day.

11. The livestock sector contributes substantially to the European economy (€168 billion annually, 45% of the total agricultural activity) and creates direct jobs for 4 million people and indirectly support the work of 30 million people, mostly in rural areas. European industries linked to animal production (milk and meat processing, feed for livestock) have an annual turnover of approximately €400 billion. Future livestock production could in fact contribute greatly to the circular economy or digital industry, creating new European economic champions. Hocquette, Mollier, Darmon, Peyraud, 2019.
Europe is ranked lowest in the world in terms of CO2 output/produced proteins. FAO statistics also show a 51% drop in emissions from livestock, largely due to the shift to a more specialised agri-livestock system, with still relevant large margin for improvement.
Emission in Agriculture 1961 - 2014 (Enteric Fermentation) of Europe

Source: FAO stats