

We Effect response to the European Commission consultation on the Sustainable Food System Framework Initiative

We Effect was founded in 1958 by enterprises and organisations within the cooperative movement in Sweden, on the core cooperative principle of solidarity.

We Effect currently works in more than 20 countries in Asia, Eastern Europe, Latin America and Africa through our regional offices in partnership with more than 200 local CSOs, farmer organisations, cooperative federations and other democratic organisations.

The core strategy is to strengthen cooperatives of women and men living in poverty through membership-based democracy, long-term economic thinking, social responsibility and transparency.

Partner organisations include farmer organisations, housing cooperatives, and savings and credit association. Strategic partnerships are established with expert organisations involved in human rights, academia and advocacy.

General considerations

We Effect welcomes the Sustainable Food Systems Framework Initiative (SFS) as a cornerstone to deliver ambitious objectives of also the external, non-EU, aspects of the European Green Deal and of the Farm to Fork Strategy.

Firstly, we want to stress the importance of the international dimension of food systems. With the EU being the third biggest importer of food in the world, it is crucial that the SFS covers the entire food value chain for products entering the EU single market. By doing this, the SFS has the possibility to drive global convergence towards higher levels of environmental and social standards in global food supply chains.

The SFS therefore needs to adopt a holistic approach to sustainability throughout the food value chain, recognising that food systems are comprised of all the sustainability elements: social, economic and environmental. Reforming the governance of food systems requires policy actions that tackle the root causes of the unsustainability of the current food system. A system that is currently not addressing poverty and inequality issues for small-scale farmers.

Policy coherence for increased resilience

Ensuring policy coherence and harmonisation will be key and require alignment of relevant laws, policies and trade agreements. The SFS needs to provide strategic direction for various sectoral policies affecting food systems. Areas of policy such as agriculture, food security and environmental law have seldom been considered coherently through a food policy lens.

Additionally, it will need to be strengthened with references to fundamental rights and the inclusion of access to justice provisions, linking up to the Corporate Sustainability Due

Diligence Directive. This, as well as recognising that the import of agricultural commodities can contribute to deforestation in third countries, calls for policy coherence with two laws currently under negotiation.

Linking up with the deforestation regulation, the SFS framework initiative is a crucial opportunity to steer agricultural practices towards agroecology and agroforestry. Food production models which allow us to tackle several environmental challenges simultaneously, contribute to preserved biodiversity while building resilience in farming systems. To exemplify, agroforestry, where trees are grown in combination with agriculture on the same plot of land, increases overall productivity, generates more biomass, maintains and restores soils and provides additional valuable ecosystem services.

Small-scale farmers needs

Focusing in particular on small-scale farmers in the global South, it is important to stress that the initiative needs to be applicable and correct for small-scale actors outside the EU that are very much involved in the food supply chain in the EU.

A majority of these small-scale farmers, many of which are women responsible for providing food for their families, live with high economic insecurity, are increasingly affected by climate change and struggle with securing access to land and sufficient yields in times of food insecurity and price increases.

Small farmer cooperatives have limited administrative capacity and without support, additional sustainability requirements may risk leading to difficulties exporting to the EU. It is crucial that the cost of the transition towards sustainability should not be paid by the most disadvantaged.

It therefore needs to be ensured that sustainable food systems chapters are introduced in future trade agreements. Also that support systems such as the new NDICI instrument includes a human rights-based approach, and that use of partnerships with third countries encompassing concrete action plans, along with additional programmes and financial tools, all aim to help small-scale farmers meet any new EU sustainability requirements.

The recently adopted European Parliament [resolution](#) on addressing food security in developing countries reiterates a number of our asks and may constitute an additional basis for further developing the external elements of the SFS.