

Overview: EU Farm to Fork and Green Deal Initiatives

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EU Green Deal and Farm to Fork Strategy: Current status

[Farm to Fork Strategy](#)

[European Green Deal](#)

Update

This summary highlights the main European Commission initiatives relating to the EU Green Deal and Farm to Fork Strategy with potential implications for agri-food exports from low- and middle-income countries, as of 20 June 2024.

What is changing?

The European Green Deal, adopted at the end of 2019, is a set of policy initiatives that aims to put the EU on the path to a green transition. It sets out how to make Europe the first climate-neutral continent by 2050, with an action plan to boost the efficient use of resources, move to a clean, circular economy, restore biodiversity, and cut pollution.

The Farm to Fork Strategy is at the heart of the European Green Deal, aiming to make food systems fair, healthy, and environmentally friendly. Adopted in May 2020, the strategy sets out both regulatory and non-regulatory initiatives, with the key aims of reducing the environmental and climate footprint of the EU food system; ensuring food security in the face of climate change and biodiversity loss; and leading a global transition towards competitive sustainability, from farm to fork.

This summary outlines the main initiatives under the EU Green Deal and Farm to Fork Strategy that are likely to have an impact on agri-food trade from low- and middle-income countries.

Sustainability

[Sustainable Food Systems framework legislation](#)

The proposal for a legislative framework for sustainable food systems was initially presented as one of the flagship initiatives of the Farm to Fork Strategy. As well as pursuing specific sustainability-related goals, this law would aim to mainstream sustainability in all the EU's policies, which would require a new legal framework for all future food policy and legislation. The

framework was also expected to contain (among others) definitions of sustainability, principles on labelling requirements for food products, and minimum criteria for sustainable public procurement of food. However, work on this initiative has not progressed as originally planned.

Timeline: The proposal was intended to be published in Q3/Q4 of 2023. This did not take place, and the initiative was not included in the [Commission's published work programme for 2024](#). The timeline for the sustainable food systems proposal is therefore currently uncertain.

Directive on Corporate Sustainability Reporting

Current EU law (Directive [2013/34/EU](#)) requires all large companies, and all companies listed on the stock market, to disclose information on their risks and opportunities arising from social and environmental issues, and on the impacts of their activities on people and the environment. This helps investors, civil society organisations, consumers, and other stakeholders to evaluate the sustainability performance of companies.

The new Directive on Sustainability Reporting modernises and strengthens the rules about the social and environmental information that companies have to report. A wider group of large companies, as well as SMEs listed on the stock market, will now be required to report on sustainability. Non-EU companies listed on the stock market that have significant activity in the EU (turnover >€150 million), and a subsidiary in the EU, will also face new reporting obligations. This will put demands on their upstream suppliers to provide information on sustainability.

The specific information that must be presented by companies is set out in European Sustainability Reporting Standards (Regulation [2023/2772](#)). These standards aim to ensure that all companies provide reliable and consistent data which allows stakeholders to compare their sustainability performance.

Timeline: Directive (EU) [2022/2464](#) was published in December 2022 and entered into force on 5 January 2023. The first companies will have to apply the new rules for the first time in financial year 2024, for reports published in 2025.

Directive on Corporate Sustainability Due Diligence

This Directive aims to foster sustainable and responsible corporate behaviour throughout global value chains. EU companies with more than 1,000 employees and a turnover above €450 million, and non-EU companies with a net turnover above €450 million within the EU, will be required to identify and, where necessary, prevent, end, or mitigate adverse impacts of their activities on human rights (such as child labour and exploitation of workers) and on the environment (such as pollution and biodiversity loss).

The new obligations on EU companies will intensify scrutiny of environmental and human rights impacts along value chains supplying the EU market. While most non-EU operators are not directly addressed by these obligations, they will probably have to provide a greater quantity and

range of information on their operations to their EU buyers, to help them demonstrate that sufficient attention (“due diligence”) is being paid to these possible adverse impacts.

Timeline: The Council of the EU (Member States) reached a compromise agreement in March 2024. The European Parliament agreed to the new text in April 2024, and it will be formally approved and enter into force in the second half of 2024.

EU Member States will adopt national laws to implement the Directive within 2 years (approximately by mid-2026).

The due diligence obligations will apply from mid-2027 to mid-2029, depending on the size of the company.

Proposal for revision of EU marketing standards on fruit and vegetables, honey/fruit juices and jams, poultry, olive oil, the hop sector, and eggs

EU marketing standards help to improve the quality of products, provide consumers with adequate and transparent information, and improve financial returns to growers by reducing false claims and unfair competition. Some current standards are now becoming outdated and may hinder efforts to make food systems more efficient and sustainable. These proposals aim to update the existing standards to encourage the supply of more sustainable products and simplify current legislation. The revision of the standards also seeks to address sustainability issues such as food waste.

Timeline: The new standards for fruit and vegetables, and for eggs, were published in November 2023, for the hop sector in December 2023, and for honey/ fruit juices and jams in June 2024. The new standards for poultry meat are yet to be adopted and published.

Council Regulation of certain commodities/products associated with deforestation

Deforestation and forest degradation are occurring at an alarming rate, aggravating climate change and biodiversity loss. The main driver of deforestation and forest degradation is the expansion of agricultural land to produce commodities such as cattle, wood, palm oil, soy, cocoa, or coffee. The objective of this initiative is to curb deforestation and forest degradation resulting from EU consumption and production. It aims to minimise consumption of products coming from supply chains associated with deforestation or forest degradation, and to increase EU demand for, and trade in, legal and “deforestation free” commodities and products. This will provide opportunities to enhance trade from non-EU countries in deforestation free products, as well as boosting opportunities, and creating a fairer and more transparent market for suppliers that invest in sustainable, forest-friendly strategies.

EU companies will have to demonstrate that all products sold on the EU market are “deforestation free” and produced in accordance with legislation in the country of origin. To support this due diligence process, producers and exporters will have to provide specific

geolocation information linked to individual production plots of land, and demonstrate the right to use that land. The requirements and timescale may be challenging for some small-scale producers, for businesses sourcing from complex value chains with large numbers of smallholders, and for smallholders/ indigenous communities in countries where enforcement of land rights is weak.

Timeline: This Regulation was published in June 2023. The new rules will apply from 30 December 2024.

Labelling

Proposal for a Green Claims Directive

Today it is difficult for consumers, companies, and other market actors to make sense of the many labels and initiatives on the environmental performance of products and companies. There are more than 200 environmental labels active in the EU, and more than 450 worldwide. Some of these are reliable, but some are not, and they cover a diverse range of issues. Greenwashing is also a problem, where companies give a false impression of their environmental impact or benefits. This misleads consumers and does not give fair advantage to companies that are making the effort to genuinely green their products and activities. To tackle this issue, the European Green Deal states "Companies making 'green claims' should substantiate these against a standard methodology to assess their impact on the environment".

Under this initiative, new rules will aim to establish a common methodology and enforcement mechanisms for environmental claims for all products (including agri-food). This will provide more consistent information, and prevent companies from making false environmental claims. Given the wide range of private sustainability standards, EU horizontal standards may be simpler for non-EU exporters facing diverging demands. However, there may be technical challenges and associated costs of meeting a broad range of environmental criteria.

Timeline: The proposal was published in March 2023 and is under discussion in the European Parliament and the Council of the EU. The Parliament (March 2024) and Council of the EU (June 2024) have adopted their negotiating positions, and negotiations between them could start in the last quarter of 2024. Once adopted, Member States will have 2 years to transpose the Directive into national law.

Sustainability labelling framework

Under the Farm to Fork Strategy, the European Commission announced a proposal for a sustainability labelling framework with the aim of empowering consumers to make informed and sustainable food choices. The proposal will govern the information given to consumers relating to the sustainability of food products, including nutritional, climate, environmental, and social aspects. For companies supplying the EU market, this will help sustainable suppliers to differentiate their products, mitigating potential effects of greenwashing.

Timeline: To be included in the [Sustainable Food Systems framework](#) that has been delayed (see above).

Origin indication labelling

Indicating the country of origin is currently obligatory for certain foodstuffs including beef and beef products, fresh fruit and vegetables, fishery products, honey, olive oil, and eggs. Under the Farm to Fork Strategy, a proposal is under development to revise the EU rules on information provided to consumers. This includes extending the mandatory origin labelling to other products such as milk, meat used as an ingredient, rabbit and game meat, rice, durum wheat used in pasta, potatoes and tomato products. For non-EU suppliers, origin labelling can enhance the value of products with a strong geographical link in relation to their competitors. However, increasing the amount of origin information enables buyers/ customers/ retailers to become more demanding about specific origin, and could potentially limit opportunities to enter markets. The focus on origin, and preference for local sourcing within the EU, could also reduce demand for imported produce.

Timeline: This proposal was expected in Q3/Q4 of 2023 as part of a broader review of food information to consumers. However, the Commission has indicated that work on this proposal is still ongoing.

Nutrient profiles and front-of-pack nutrition labelling

The Farm to Fork Strategy targets the entire food chain, and describes the need to further empower consumers through labelling information. A revision of Regulation (EU) No [1169/2011](#) on the provision of food information to consumers (the FIC Regulation) is under way. This includes a proposal for EU harmonised and mandatory front-of-pack nutrition labelling, and for setting nutrient profiling criteria (thresholds of nutrients above or below which nutrition and health claims on foods are restricted). The aim is to encourage EU consumers to make more informed and healthy choices by restricting nutrition and health claims to foods with certain nutrient content, and by harmonising rules on mandatory nutrition labelling. The changes will require adjustments to all packed food exported from non-EU countries to the EU market.

Timeline: This proposal was expected in Q3/Q4 of 2023 as part of a broader review of food information to consumers. However, the Commission has indicated that work on the proposal is still ongoing.

Livestock

Revision of existing animal welfare legislation

The Farm to Fork Strategy announced that by the end of 2023 the Commission will revise animal welfare legislation to align it with the latest scientific evidence. This revision would aim to address shortcomings in current animal welfare rules, including lack of adequate animal welfare

monitoring, inadequate training or protection of certain species, and insufficient consumer information. The Commission plans to revise the following pieces of legislation: the Directive on the protection of animals kept for farming purposes; four Directives laying down minimum standards for the protection of laying hens, broilers, pigs, and calves; and the Regulations on the protection of animals during transport and at the time of killing. A proposal on animal welfare labelling is also foreseen.

For non-EU countries supplying the EU market, this may increase demands for monitoring/certification, and potentially increase costs to meet more stringent animal welfare requirements.

Timeline: A proposal on the protection of animals during transport was published on 7 December 2023. The European Parliament did not have the time to consider the proposal before elections in June 2024. The Parliament's review of the proposal will start in the last quarter of 2024, followed by negotiations with the Council of the EU (Member States). The Commission will continue its preparatory work on other animal welfare proposals.

Revision of Feed Additives Regulation

The current Feed Additives Regulation (EC) No [1831/2003](#) sets out rules for authorising feed additives and placing them on the market. A proposed revision of the rules aims to contribute to a more sustainable food production system by establishing new criteria to promote the authorisation of feed additives, with positive effects on animal welfare and on the environment. It will support mechanisms to promote innovation in feed additives, particularly those contributing to reducing the use of antibiotics and mitigating climate change. Further aims include streamlining the risk assessment processes, and reducing the administrative burden for authorisation holder applications, to bring innovative feed additives to the market earlier.

Timeline: The legislative proposal is likely to be postponed to 2025.

Plant health/pesticides

Sustainable Use of Pesticides Regulation

In June 2022, the European Commission adopted proposals for a new Regulation on the sustainable use of plant protection products, in line with the Farm to Fork and Biodiversity strategies. These new proposals were part of a package of measures to reduce the environmental footprint of the EU's food system and help mitigate the impacts of climate change and biodiversity loss. The main measures included: legally binding targets to reduce the use and risk of chemical pesticides by 50% by 2030; environmentally friendly pest control, ensuring that farmers and other professional pesticide users practise integrated pest management (IPM); and a ban on all pesticides in sensitive areas, including ecologically sensitive areas to be preserved for threatened pollinators.

The proposed Regulation addresses the use of plant protection products within the EU, and does not include provisions for operators in non-EU countries. However, changes in authorisations, and the loss of EU maximum residue levels (MRLs), do have an indirect impact on the range of plant protection products that can be used on crops for export to the EU.

Timeline: The Commission's proposal was put to the European Parliament and the Council of the EU for discussion. In November 2023, the European Parliament (very unusually) entirely rejected the Commission's proposal. In February 2024, European Commission President Ursula von der Leyen announced that the Commission will withdraw its proposal. It has now launched a Strategic Dialogue on the Future of EU Agriculture, a process that may lead the Commission to put forward a new proposal on the sustainable use of pesticides.

Pesticides containing biological active substances

The European Commission has adopted new rules to facilitate the approval of microorganisms for use as active substances in plant protection products. The aim is to simplify the risk assessment of microorganisms and bring them to the EU market more quickly. This will increase the availability of, and access to, biological plant protection products, in line with the Farm to Fork Strategy objective of reducing dependency on chemical pesticides. The more rapid development of this technology in Europe could accelerate the availability of non-chemical options in non-EU countries.

Timeline: Four Regulations were published on 1 September 2022.

Food safety

Proposal on new genomic techniques

In 2001 the EU established rules for genetically modified organisms (GMOs) (Directive [2001/18/EC](#)). Since then, new genomic techniques (NGTs) have been developed, which the European Commission believes can benefit farmers, consumers, and the environment. However, the current rules make it challenging for products from these NGTs to enter the EU market. So the Commission is proposing new rules with two different categories of NGT plants/ products.

The first category of plants/ products are considered equivalent to those produced through regular breeding, and will not have to follow current EU GMO rules (Directive 2001/18/EC and Regulation [1830/2003](#)). They only need to be notified/verified by the EU (but not risk assessed) before being introduced to the market.

The second category are NGT plants/ products not equivalent to those produced by conventional breeding. These must undergo risk assessment and authorisation under the existing GMO rules.

Timeline: Discussions on the Commission's proposal are ongoing in the European Parliament and Council of the EU. The European Parliament agreed its negotiating position in February 2024, and broadly supports the Commission's proposal. The Council must reach a common

position among the EU Member States before negotiating with the Parliament, but had not managed to do so by June 2024.

Regulation on plastic materials/articles to come into contact with foods

Regulation (EU) [2022/1616](#) on recycled plastic materials and articles intended to come into contact with foods repeals the previous rules (Regulation (EC) No 282/2008). The new legislation forms part of the measures being brought forward under the EU Circular Economy Action Plan (CEAP). The changes are designed to reduce dependency on raw materials, boost the market for recycled plastics, and ensure that recycled plastics are safe when used in contact with food. Components of food contact materials can transfer from packaging materials into food, affecting not only the safety of the food but also the quality, taste, smell, and appearance. The new Regulation sets out rules to ensure the safety of these materials, including the decontamination of plastic during recycling, and regulation of all recycling processes. Recycling installations located outside the EU must be on the EU register, and must fully comply with the new Regulation, if their recycled plastic is to be used on food products placed on the EU market.

Timeline: The Regulation entered into force on 10 October 2022.

Packaging

Directive amending rules on packaging and packaging waste

The new rules mean stricter sustainability requirements on all food packaging, which will also apply to non-EU suppliers of packaged food to the EU market.

- All packaging must be recyclable. Plastic packaging must contain minimum amounts of recycled plastic, packaging must be minimised, and contaminants must be reduced. Producers of recycled plastic in non-EU countries must produce it in a way that is equivalent to EU standards on collection of plastic and environmental emissions.
- There will be new limits on concentrations of polyfluorinated alkyl substances (PFAS) in packaging.
- Documentation demonstrating compliance with new sustainability requirements must be passed along the supply chain.
- There will be restrictions on the use of certain packaging materials, including a ban on single use plastic packaging for quantities of fresh fruit and vegetables <1.5 kg, and a requirement that all sticky labels attached to fruit and vegetables are compostable.

Timeline: The final Regulation is expected in the second half of 2024 and the new rules would apply from early 2026, with recyclability and recycled plastic targets applying from 2030.

Policy framework for biobased plastics and biodegradable or combustible plastics

The transition to a circular, resource-efficient, climate-neutral economy, together with the ambition to reach zero pollution and the need to protect and enhance biodiversity, have triggered a rethink about how plastics are produced, used, and disposed of in the EU. This EU Communication outlines the EU policy framework on biobased, biodegradable, and compostable plastics. It sets out the EU vision for tackling plastic pollution through the development of alternative plastics (e.g. biobased, biodegradable, and compostable) rather than fossil-based plastics.

Timeline: Communication published November 2022.

Sources

[Farm to Fork Strategy](#)

[European Green Deal](#)

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