

### 3/6/2020: Input to European Commission public consultation on RTD Green Deal call: Testing and demonstrating systemic innovations for sustainable food from farm to fork

We **welcome this proposal as very positive** in supporting the Farm-to-Fork policy, which is a key element of the Green Deal.

We **particularly welcome the specific reference to fertilisers and nutrients** in the proposed call 'Scope'. This is an important for both agricultural productivity and sustainability. Nutrient supply is necessary and critical for crop productivity, food quality and farm economics, but at the same time, nutrient losses are a major environmental problem, with eutrophication being maybe the biggest cause of freshwater quality failure in Europe (Water Framework Directive). Improving nutrient management can also address other policy challenges, in particular EU dependence on the Critical Raw Material phosphate rock.

#### 1) Content:

##### **Economic and policy:**

We suggest to **include assessing economic and policy barriers and needs** (including with regards to the current and future Common Agricultural Policy).

A key challenge currently is that **unhealthy, non-sustainable and non-local food is today often cheaper**. This must be addressed if the Farm-to-Fork objectives are to be achieved, other than for a minority of the population.

Projects should therefore **assess the policy changes, including subsidies, fiscal or other economic tools**, which would facilitate roll-out and lasting implementation of the solutions tested, and make proposals to modify existing policies where appropriate.

##### **Circular economy and recycling**

The "circular bioeconomy" is mentioned in the overall objectives page 1, but neither recycling nor circularity are indicated anywhere in the project Scope nor Expected Impact.

We suggest to add to challenge (4) of "Scope" and to the second bullet point under "Expected Impact: Test, pilot and demonstrate ..." (alongside reducing food losses and waste) the objective of **recycling of nutrients and valorisation of carbon and other materials** in **non-avoidable** food wastes and in agricultural by-products, according to the waste hierarchy.

##### **Nutrient stewardship**

Under point (3) of Scope, we suggest to widen to "increasing the efficiency of fertilising materials and reducing losses of nutrients from soils, manures and fertilisers."

In Europe, the total amount of phosphorus applied to land in manures is comparable to that in mineral fertilisers (with significant regional variations). Both manure and fertiliser nutrients should be clearly addressed. Furthermore, the reference to soil is important for a holistic agronomic approach.

#### 2) Formulation / clarity

Under Scope it is indicated that projects must address only ONE of the five challenges. We suggest that this seems contradictory to the stated objective of "system thinking. It is likely, and even desirable, that systemic approaches will address several of the five challenges.

We suggest therefore to write "one or more of the following five challenges".