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To:

Mr Gerfried Gruber

Head of Department for the Federal Ministry of Sustainability and Tourism, Agriculture

Brussels, 18th October 2018

Subject: Civil society views on the EU Plant Protein Plan ahead of Vienna launch

Dear Mr Gerfried Gruber

We represent a coalition of civil society organisations who want the EU Protein Plan to reach its full potential and ensure the sustainability of plant protein crops in the European Union. We have raised the following concerns and recommendations with Commissioner Hogan and his cabinet and now take the opportunity to raise them with you.

The link between industrial animal production and plant protein demand

Demand for plant protein crops has increased substantially in recent decades due to increased EU production and consumption of animal products, in particular poultry (including eggs) and pig meat, as both animals are more intensively farmed and almost wholly reliant on feed composed of cereal and soybeans. Reducing EU production and consumption of animal products will sizeably reduce demand for protein crops to more sustainable and equitable levels and should be a priority in the protein plan.

Land destruction and degradation in third countries

The EU's intensive animal agriculture model, which is designed to meet high production and consumption volumes, drives the conversion of forests and other ecosystems outside the EU. It is therefore critical that the European Commission adopts an Action Plan to halt deforestation and forest degradation, including legislation to ensure that agricultural commodities, including protein crops, linked to the EU market are free from deforestation and fully respect human rights.

The expansion of industrial soy in Europe

Due to a lack of agricultural land to grow large scale soy in the EU, there is increased pressure on central and eastern European Members States to use their land for soy production. Any expansion in these countries will lead to displacement (directly or indirectly) of small-scale farms and land grabs by bigger enterprises or corporations.

There is real danger that the problems associated with the intensive model in Latin America will just be transplanted to Central and Eastern Europe, which will undermine the objectives of the Common Agricultural Policy and other social and environmental objectives (e.g. climate commitments). Simply expanding soy production in the EU will not solve the protein problems associated with the high level of intensive animal production. A sustainable EU protein plan should support local (protein) feeds from local farms, closed nutrient circles (legumes can play a key role in the rotation) and give priority to small scale farms and rural diversity.

Promotion of pulses for human nutrition and environmental benefits

With the overall goal of reducing EU dependency on protein feedstocks and meat consumption above nutritional need, the new EU protein strategy should promote pulses for human nutrition and aim to reduce intensive animal production. Both approaches will ultimately lead to lower dependence on feed protein imports.

Today, average EU animal protein consumption leads to an intake of saturated fatty acids that is around 40% higher than recommended and is known to increase the risk of cardiovascular diseases. Thus, a reduction in the consumption of animal products, notably high-fat products, would reduce the European disease burden. The market for plant-based meat and dairy alternatives is growing rapidly, with plant-based meat predicted to reach a global net worth of €4.2bn by 2020 and dairy alternatives predicted to grow to a market value of €19bn by 2022. Europe is currently the largest market for meat substitutes with a 39% global market share.

The introduction of leguminous crops in crop rotation would have several other environmental and economic benefits - they help contribute to climate mitigation and adaptation, use little water, add valuable nitrogen to the soil and increase soil fertility and yield. Producing more leguminous crops is also a tool that can assist European farmers in cutting their pesticide dependency. Furthermore, many of their varieties are rich food sources for pollinators.

Investing in research into diverse protein crop development

There is an urgent need for investment into the research and development of high quality, diverse, nutritious, and often neglected, seed crops and grain legumes (pulses) for human consumption that will benefit human health, the environment and support biodiversity.

Policy recommendations:

The Plant Protein Plan should:

- Assess what payments support production models that decrease input dependence of farmers (including animal feed, fertilisers and pesticides) and deliver concrete environmental and animal welfare benefits

- look into concrete measures which can reduce production and consumption of animal products, in order to mitigate the detrimental effects of industrial animal farming and to raise plant protein crop demand for human consumption; including creation of markets for less consumed leguminous (like lupins, fababeans, lentils, checkpea¹)
- Assess what measures can incentivise the production of diverse and underused protein crops for human food, over intensive animal production (including feed) through crop rotation requirements;

In addition, the EU should:

- Adopt an EU Action Plan on deforestation and forest degradation, including legislation to ensure the imports of agricultural commodities, such as protein crops, do not cause deforestation and fully respect human rights;
- Promote the production of protein crops that support beekeeping and offer provisions for wild pollinators;
- Conduct a full assessment with a results indicator on how the objectives of the Protein Plan can be addressed within the CAP, including:
- Include leguminous crops in the crop rotation definition in the enhanced conditionality
- Providing a grant fund under Pillar II to assist farmers in transitioning away from intensive animal farming to the local production of protein crops for human food;
- Increasing financial support for long crop rotation that involve plant protein cultivation while ensuring that the Farm Advisory Service (FAS) in the future increase farmers awareness of soil fertility's potential to increase profit over time;
- Removing support for monocultures, intensive animal farming and other practices that effectively lead to landholding concentration; likewise, these practices should not be supported outside the EU;
- Supporting diverse agroecological farming, creating short supply chains from farm to fork at fair prices for farmers and citizens;
- Ensuring protein and leguminous seed availability at fair prices, this being an opportunity to encourage the ecological breeding of pulses and legumes for human consumption and their marketing in the value chain;
- Providing a grant fund under Pillar II to support improved, decentralised facilities for seed selection and development, processing, storage and marketing of local and regional varieties of legumes.

Thank you for your consideration and we hope that these concerns and recommendations will be acknowledged during the important discussions on the EU Plant Protein Plan in Vienna.

Yours sincerely,

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¹ <http://www.louisboltk.org/sustainable-agriculture/plant-breeding/protein2food-project>

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