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# Feedback from:

## European Sustainable Phosphorus Platform (ESPP)

### Feedback reference

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### Submitted on

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### Submitted by

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### User type

Non-governmental organisation (NGO)

### Organisation

European Sustainable Phosphorus Platform (ESPP)

### Organisation size

Micro (1 to 9 employees)

### Transparency register number

260483415852-40 (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=260483415852-40&locale=en>)

### Country of origin

Belgium

### Initiative

Farm to Fork Strategy (<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12183-Farm-to-Fork-Strategy->)

ESPP welcomes the objective of a holistic EU approach to “farm to fork”, taking into account sustainable development, climate change, farmers’ incomes through to dietary choices and human health impacts.

We welcome that one of the four proposed strategy objectives is “the shift towards healthy, sustainable diets”. This will require concerted and proactive EU action on food policy. The EU will need to influence dietary choice not only by “promotion” (including education and information) but also by effective policies (with Member States) possibly including fiscal policies and regulatory market intervention for certain types of food product. Links should be made to Horizon Europe, in particular to the “Soil Health and Food” mission

We welcome the statement that the Farm to Fork Strategy should “feed into the European Commission’s circular economy objectives”. Links should be made to the Commission’s “Circular Economy Strategy”, in particular to the new EU Fertilising Products Regulation 2019/1009. Links should be made to the Horizon Europe stated objective of “A comprehensive EU policy to balance nutrient cycles ...”

One of the four defined objectives is to “Reduce food loss and waste”. Food waste policy should take into account the nutrient value of food waste losses, which is more significant for environmental and economic impact than “tonnes of waste”.

ESPP welcomes that proposal “providing better food information such as on where the food comes from and its nutritional value.” Phosphorus levels in food products are extremely important for kidney disease patients (CKD). The EU should assess whether consumer information on phosphorus levels in certain food products is appropriate, and if so whether this should be ‘front of pack’ or rather via an online bar-code linked data base available for concerned publics.

ESPP welcomes the link made in the proposed Roadmap to the CAP. We underline the importance of the proposed FaST (Farm Sustainability Tool for Nutrients), included in the Commission’s CAP revision proposals..

The Roadmap proposes to develop measures “to significantly reduce the use and risk of chemical pesticides, as well as the use of fertilisers and antibiotics”. Chemical herbicides should also be targeted (not only pesticides). For “fertilisers”, a reduction in total use at the EU level is probably not compatible with maintaining levels of food production and quality. The objective should be an optimised use of fertilisers, including both synthetic mineral fertilisers and organic fertilising materials (manure, biosolids, recycled nutrient products ...) with reduced losses to air and water, and increased circularity. Implementation of the new EU Fertilising Products Regulation should be referred as a key tool to increase nutrient recycling and ensure quality and safety of fertilising products. Similarly, animal feed nutrition should continue to be optimised.

We welcome the mention of Aquaculture. The Advisory Council on Aquaculture should include in its remit addressing aquaculture feed nutrition efficiency and sustainability, and nutrient recovery / loss mitigation, and should be widened to address all non-meat/dairy protein production routes: insects, algae, bacteria ...

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## Input to EU consultation on Roadmap for “Farm to Fork Strategy”

EU public consultation to 16th March 2020:

[https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2020-941864\\_en](https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2020-941864_en)

**ESPP welcomes the objective of a holistic EU approach to “farm to fork”**, taking into account sustainable development, climate change, farmers’ incomes through to dietary choices and human health impacts.

We welcome that one of the four proposed strategy objectives is *“Promote sustainable food consumption, facilitating the shift towards healthy, sustainable diets”*.

- **This will require concerted and proactive EU action on food policy**, engaging Member States and led by the Commission, in particular DG SANTE (lead DG for the “Farm to Fork Strategy”). The EU will need to influence dietary choice not only by *“promotion”* (including education and information) but also by effective policies (with Member States) possibly including fiscal policies and regulatory market intervention for certain types of food product.
- Links should be made to **Horizon Europe**, in particular to the **“Soil Health and Food” mission**

As indicated in the roadmap, the food system including dietary choice, generates 20-30% of greenhouse emissions, as well as to air, soil and water pollution and biodiversity loss, whilst at the same time around 20% of EU food production is lost as waste whilst 7% of the EU population cannot *“afford a quality meal every second day”* and obesity and diet related disease and health costs are rising.

We welcome the statement that the Farm to Fork Strategy should *“feed into the European Commission’s circular economy objectives”*.

- Links should be made to the Commission’s **“Circular Economy Strategy”**, in particular to the new **EU Fertilising Products Regulation 2019/1009**
- Links should be made to the **Horizon Europe** stated objective<sup>i</sup> of *“A comprehensive EU policy to balance nutrient cycles ... shall include inter alia sustainable sourcing of nutrients for example from wastes, alternative soil management, and livestock emissions and recovery of recycling of nutrients for different industrial sectors ... realisation of a nutrient policy on local and regional levels ... systemic solutions for a sustainable management of nutrients flow in Europe will enhance sustainable, inclusive, safe and healthy primary production and food systems”*



One of the four defined objectives is to “Reduce food loss and waste”.

- **Food waste policy should take into account the nutrient value of food waste losses**, which is more significant for environmental and economic impact than “tonnes of waste”. Further data and analysis are needed on this approach, see for example recent papers by authors from inter alia Nestlé and WRaP UK<sup>ii</sup>.

We welcome that proposal that “the Commission will amongst others, propose actions to help consumers choose healthy and sustainable diets by providing better food information such as on where the food comes from and its nutritional value.”

EFSA published<sup>iii</sup>, for the first time, in 2019, and ADI for phosphorus, stating that It is stated that children and adolescents with average levels of phosphorus in their diet may currently exceed this ADI.

The EU Regulation on Food Information [1169/2011](#) currently makes obligatory, for pre-packed foods, ‘front of pack’ information on content of calories, fat, saturates, carbohydrate, sugars, protein and salt, whereas other nutritional information, including levels of minerals (including phosphorus) is voluntary.

Phosphorus levels in food products are extremely important for kidney disease patients (CKD), that is maybe around 30 million persons in Europe<sup>iv</sup> but can vary widely in processed foods<sup>v</sup>

- **The EU should assess whether consumer information on phosphorus levels in certain food products is appropriate**, and if so whether this should be ‘front of pack’ or rather via an online bar-code linked data base available for concerned publics.

ESPP welcomes the link made in the proposed Roadmap to the CAP.

- **We underline the importance of the proposed FaST (Farm Sustainability Tool for Nutrients), included in the Commission’s CAP revision proposals**, which if adopted would represent a major step forward in monitoring fertiliser use and nutrient losses in EU agriculture.

The Roadmap proposes to develop measures “to significantly reduce the use and risk of chemical pesticides, as well as the use of fertilisers and antibiotics”.

- **Chemical herbicides** should also be targeted (not only pesticides).
- For “fertilisers”, a reduction in total use at the EU level is probably not compatible with maintaining levels of food production and quality. **The objective should be an optimised use of fertilisers, including both synthetic mineral fertilisers and organic fertilising materials (manure, biosolids, recycled nutrient products ...) with reduced losses to air and water, and increased circularity.**
- **Implementation of the new EU Fertilising Products Regulation** should be referred as a key tool to increase nutrient recycling and ensure quality and safety of fertilising products.
- Similarly, **animal feed nutrition** should continue to be optimised.



We welcome the mention of Aquaculture (proposed Advisory Council for Fisheries and Aquaculture), because aquaculture is a key potential area for improving food chain sustainability, as a source of healthy protein, and with significant potential today for improving sustainability, including nutrient use in feed and nutrient recycling with waste loss and pollution reduction.

- The Advisory Council on Aquaculture should include in its remit addressing **aquaculture feed nutrition efficiency and sustainability, and nutrient recovery / loss mitigation**.

Fisheries and aquaculture are only one (albeit today the most developed) route to providing non-meat / dairy dietary protein, essential for more sustainable healthy diets, in combination to improving meat / vegetable balance in diets. Other potential routes include insects, algae and engineered bacterial production, both for animal feed and for extraction of proteins, essential oils, vitamins and other molecules for human nutrition. These routes however today face a range of obstacles, including regulatory (animal feed and human food regulations, end-of-waste, etc) and consumer / industry acceptance and roll-out.

- The Advisory Council for fisheries and aquaculture should be **widened to address all non-meat/dairy protein production routes: insects, algae, bacteria ...**

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<sup>i</sup> European Commission, DG Research, 12/2019 “Orientations towards the first Strategic Plan for Horizon Europe” [https://ec.europa.eu/info/sites/info/files/research\\_and\\_innovation/strategy\\_on\\_research\\_and\\_innovation/documents/ec\\_rtd\\_orientations-he-strategic-plan\\_122019.pdf](https://ec.europa.eu/info/sites/info/files/research_and_innovation/strategy_on_research_and_innovation/documents/ec_rtd_orientations-he-strategic-plan_122019.pdf)

<sup>ii</sup> “Nutrition in the bin: a nutritional and environmental assessment of food wasted in the UK”, K. Cooper, T. Quested, et al., Nestlé Research Centre, Lausanne, Switzerland, and WRAP United Kingdom, *Frontiers in Nutrition*, 5, 19, 2018, <https://doi.org/10.3389/fnut.2018.00019> and “Wasted food, wasted nutrients: nutrient loss from wasted food in the United States and comparison to gaps in dietary intake”, M. Spiker et al., *J Acad Nutr Diet* (2017) 117(7):1031–40. <https://doi.org/10.1016/j.jand.2017.03.015>

<sup>iii</sup> “EFSA issues new advice on phosphates”, 12<sup>th</sup> June 2019 [www.efsa.europa.eu/en/press/news/190612](http://www.efsa.europa.eu/en/press/news/190612) “Outcome of the questions for health professionals in the fields of nephrology, mineral metabolism, cardiovascular and nutrition medicine on phosphates food additives re-evaluation”, EFSA 2019, Question number: EFSA-Q-2018-00312, EFSA Supporting publication 2019:EN-1624 [www.efsa.europa.eu/en/supporting/pub/en-1624](http://www.efsa.europa.eu/en/supporting/pub/en-1624)

<sup>iv</sup> Estimate based on the indication of 10% of the population by EFSA 2019 (reference above) or 7% of the population by Ketteler in “Clinical aspects of natural and added phosphorus in foods”, Humana Press (Springer), 260 pages, 2017, editors O. Gutiérrez, K. Kalantar-Zadeh and R. Mehrotra [www.springer.com/us/book/9781493965649](http://www.springer.com/us/book/9781493965649)

<sup>v</sup> Dietary Phosphate and the Forgotten Kidney Patient: A Critical Need for FDA Regulatory Action, M. Calvo, R Shermann & J. Uribarri, *Am J Kidney Dis*. April 2019, vol. 73, Issue 4, pp. 542–551 <https://doi.org/10.1053/j.ajkd.2018.11.004>