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## JOINT DECLARATION

**Without a comprehensive impact assessment, we will not be celebrating the one-year anniversary of the Farm to Fork strategy.**

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**Today marks one year to the day since the Farm to Fork strategy was presented in Brussels by the European Commission. However, we cannot celebrate its anniversary, as the strategy still raises too many questions in the European farming and agri-food community. A year of intense debate has only increased the number of our concerns.**

We, the signatories of this declaration, do not have a single doubt that the Farm to Fork strategy with its targets will have a considerable impact on the whole agricultural value chain, from farmers to our food systems and to consumers throughout the Union. But most probably not on the ones initially hoped for or expected.

Let's be perfectly clear, we are not opposed in essence to the approach proposed within the Farm to Fork strategy or the Green Deal. We are all conscious that our food system must integrate further measures to improve its sustainability as fast as possible while maintaining the highest quality standards and food affordability.

Nevertheless, not only will this strategy have an impact on the environmental quality of our agriculture, but it will also impact on our production capacity, our competitiveness, our imports and ultimately on consumer prices. As it has been demonstrated over the past year, there are also considerable paradoxes in the composition of those generalised objectives, and by the time these are widely understood, it will be too late. We must not shy away from the debate on these paradoxes. We must collectively discuss them because, even if there appears to be a collective disregard at EU-level these days, the stakes are too high.

A comprehensive impact assessment would have been the appropriate way to engage in a concrete discussion on the substance of the Farm to Fork strategy. Such a study was promised by Vice-President Frans Timmermans. However, although this was promised on many occasions in line with the principles of “good governance” of the Commission, we now know that such an assessment will not be carried out. Yet the Commission's principles on the subject are clear, “*An impact assessment is required for Commission initiatives that are likely to have significant economic, environmental or social impacts. (...) Impact assessments collect evidence to assess if future legislative or non-legislative EU action is justified and how such action can best be designed to achieve desired policy objectives.*” In the face of the challenges posed to our food security, this neglect on the part of the Commission is both incomprehensible and unacceptable.

Individual studies on the different objectives of the strategy are not sufficient. It is only by cumulating and cross-checking the different targets proposed in the strategy that one can realise the real challenges posed by the strategy. In the area of trade policy, the same Commission has had the courage to propose a comprehensive study of the complex cumulative impacts involved in the more than 60 trade agreements signed by the EU. So why shouldn't this be possible for the Farm to Fork strategy? Why has the US government already conducted a study on our own flagship policy?

We are asking for the application of three common sense principles: to have a policy based on concrete data and scientific evidence that is in line with the better regulation principles, not on ideology and political stances; to start talking about concrete tools and technologies capable of creating enthusiasm in our farming community for this political project and finally to have the same level of ambition in the EU internal market vis-à-vis those international trade partners that don't share the same ambitions.

1 <https://ec.europa.eu/info/sites/default/files/better-regulation-guidelines-impact-assessment.pdf>

2 <https://ec.europa.eu/info/sites/default/files/better-regulation-guidelines-better-regulation-commission.pdf>

3 <https://www.ers.usda.gov/webdocs/publications/99741/eb-30.pdf?v=4992.2>

**AnimalHealthEurope** - European Animal Medicines Industry  
**Agriculture and Progress** – European Platform for Sustainable Agricultural Production  
**AVEC** – European Association of Poultry Processors and Poultry Trade  
**Ceettar** - European Organisation of Agricultural, Rural and Forestry Contractors  
**CEFS** - European Association of Sugar Manufacturers  
**CEJA** – European Council of Young Farmers  
**CEMA** - European Agricultural Machinery Industry  
**CEPM** – European Confederation of Maize Production  
**CEVI** - European Confederation of Independent Winegrowers  
**CIBE** - International Confederation of European Beet Growers  
**Clitravi** - Liaison Centre for the Meat Processing Industry in the European Union  
**COCERAL** - European association of trade in cereals, oilseeds, pulses, olive oil, oils and fats, animal feed and agrosupply  
**Copa-Cogeca** - European Farmers and Agri-Cooperatives  
**Cotance** – European Confederation of National Associations of Tanners and Dressers  
**EDA** – European Dairy Association  
**EFFAB** - European Forum of Farm Animal Breeders  
**ELO** - European Landowners' Organization  
**ePURE** - European Renewable Ethanol Industry  
**Euromontana** – European Association of Mountain Areas  
**European Livestock Voice** – European Platform of the Livestock Food Chain (with the support of its local partners **CARNI SOSTENIBILI (IT)** and **SOMOS GANADERIA (ES)**).  
**Euroseeds** - European seed sector Association  
**FARM EUROPE** – European Think Tank on Rural Economies  
**FEAP** - Federation of European Aquaculture Producers  
**FEFAC** - European Feed Manufacturers' Federation  
**FEFANA** - European Association of Specialty Feed Ingredients and their Mixtures  
**Fertilizers Europe** - European Fertilizer Industry Association  
**Euro Foie Gras** - European Federation of foie gras  
**IBC** – International Butchers' Confederation  
**UECBV** - European Livestock and Meat Trades Union

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