



**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
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Sustainability in the Codex European region

Purpose

This paper is intended to support a discussion on the topic of sustainable food system transformation and explore the potential for targeted work that could support members of the region through activities linked to the development and use of Codex standards.

Introduction

A definition of sustainability from the United Nations Brundtland Commission Report (1987) is “*meeting the needs of the present without compromising the ability of future generations to meet their own needs.*” Members of the Codex European region continue to engage on how Codex can support higher level political objectives to transform food systems. Our region appears aligned on many of the issues and the 33rd Session of the FAO/WHO Coordinating Committee for Europe (CCEURO33) provides opportunity for members to engage on this critical issue to explore whether there is work that could support members in the region to turn policy into practice at a national level.

Background

There is a growing awareness and consensus among political leaders, international organisations, governments, and various interested stakeholders about the urgent need for more sustainable food and agriculture systems. These systems will need to be sustainable both in environmental and food security terms, so that an adequate supply of food is maintained in a way that delivers on domestic and international environmental objectives.

International agreements and declarations emphasising the importance of sustainable practices include: the UN's Sustainable Development Goals (SDGs), specifically Goal 2 ("Zero Hunger") and Goal 12 ("Responsible Consumption and Production"); the Paris Agreement which acknowledges the role of agriculture in both contributing to, and being affected by, climate change. The Milan Charter and the Rome Declaration on Nutrition, highlight the need for transformative changes in agriculture to achieve sustainable development.

The prevailing political consensus is driven by a combination of interconnected factors, in relation to the food system. These include:

- Environmental concerns, e.g. biodiversity loss
- Climate change
- Resource scarcity, e.g. water scarcity, land degradation
- Population growth and consumer habits
- Security of food supply
- Diet and health

Codex's parent bodies, the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) have recognised the importance of sustainable food systems and the need for collaboration between stakeholders to address the interconnected challenges to food security, nutrition, and environmental protection

though more sustainable food production and consumption^{[1][2]} The UN Food Systems Summit 2021 brought together all UN Member States and constituencies from around the world to work towards global food systems transformation and achieving the Sustainable Development Goals by 2030.

Sustainability in Codex

Many countries use Codex standards as a benchmark for their national rules. Given this, Codex could play a significant role in transforming the food system through standards that promote sustainable practices that protect consumer health and ensure fair practices in food trade. However, the outcome of the current debate in Codex, framed around the next Strategic Plan, is likely to determine whether Codex will actively, or passively, support sustainability through its standards.

Exploration of whether existing national/international standards could be safely modified to promote more sustainable practices could be conducted. There could also be value in seeking to identify new work that actively encourages or promotes sustainable practices like the recent proposal on recycled packaging. Another example is digitalization and the use of data to more efficiently target regulatory resources both for regulators and industry.

Given the views expressed by members of CCEURO in consultations ahead of CCEURO it is apparent that CCEURO members lean towards Codex actively supporting the transformation towards more sustainable food systems. Elaboration of standards that support the transformation towards more sustainable food systems could increase the level of use and impact of Codex standards.

The Codex Strategic Plan for 2020-2025 recognised that climate change was a driver for change and provided an explicit link between the work of Codex and the Sustainable Development Goals (SDGs): this may prove pivotal to the long-term relevance of Codex and its approach to standard setting. The draft Strategic Plan for 2026-2031 identifies a role for Codex in *'supporting the uptake and implementation of policies and programmes to address the broader imperative to implement more sustainable food systems'*. There are signs that members are starting to factor in such considerations, particularly where a potential food safety risk may be evident, but consensus on how, or even whether, to factor in such considerations to the Codex standard setting process are undecided. Members' views vary there does appear to be a subtle shift occurring in members thinking. For example North America and the Southwest Pacific was the first region to raise the topic of climate change and its impact in a keynote address entitled at the 15th session of its coordinating committee (CCNASWP15 in 2019)^[3].

Some members are beginning to position standards and new work proposals as supporting wider sustainability objectives, for example:

- *Safe use and re-use of water in food production and processing (CCFH)*
- *vTPA principles and guidelines (CCFICS)*
- *Paperless/e-certification (CCFICS)*
- *Guidelines on the use of remote audit (CCFICS)*
- *Work to revise traceability guidelines (CCFICS)*
- *The use of recycled material in food packaging (CAC)*
- *Emerging discussion on the use of environmental inhibitors (CCPR/CCRVDF)*

These are supportive of food system transformation as each promotes sustainable practices, e.g. helping to address water scarcity; reducing energy use and reliance on fossil fuels; encouraging better targeting of regulatory resources, encouraging data sharing and public private partnership; helping to reduce food waste; and helping to reduce greenhouse gas emissions. Both the traceability and the recycled packaging proposals explicitly mentioned the environmental credentials (reduced waste) of the work when justifying its relevance. In the case of recycled packaging, the proposal also referenced sustainability and the UNFSS

CCEURO interests

The current draft of the new Strategic Plan *recognises that the inherent international diversity of food systems means that different values or solutions may be relevant in different national or regional situations*. This tells us that for some issues there is unlikely to be a one-size-fits-all solution. This runs counter to the objective of setting international standards and instead encourages countries and regions to select approaches and options

¹ [FAO Strategic Framework 2022-2031](#)

² [FAO and WHO. 2019. Sustainable healthy diets – Guiding principles. Rome.](#)

³ [Managing food safety in an era of accelerated climate change](#)

that are suitable for them. This paper is designed to support CCEURO explore how it might support governments, industry and consumers to effect transformation in our region. Key questions identified are:

- How might the region collaborate better across the multilateral system and/or across existing pan-European structures to support the incorporation of food systems strategies into policies at national level?
- Can CCEURO members learn from the UNFSS and use participatory methods to design and implement solutions that are tailored, inclusive and comprehensive?
- How might we facilitate a dialogue specifically in the context of Codex to help identify barriers that may be inhibiting actors in the food chain from taking up more sustainable practices?
- What more do we need to do to support innovation and the uptake of new technologies, including digitalisation, to support sustainable practices in European food systems?

Supporting CCEURO - options

In determining whether regional work could be initiated, the UK has drawn from its own experiences and looked at work typically associated with regional committees. We would welcome the views and any additional suggestions or options from other CCEURO members. A range of examples from the UK can be found in Annex 1.

Environmental principles

In the UK, Ministers of the Crown are placed under a duty to consider a set of five environmental principles and environmental policy statement. Principles are not rules and they do not dictate policy decisions by ministers. There could be merit in further exploring the idea of developing a set of “guiding principles”, grounded in Codex’s core values, for use by governments in the region and as an aid to members when forming policy positions within Codex. The purpose of a principles-led approach would be to provide a suitably flexible architecture that helps guide members in their efforts to transform their national food system through policies and programmes consistent with agreed principles. A principles approach would need to be implemented in a way that accounts for environmental concerns without compromising food security. If there is an appetite to explore such an approach in more detail, an EWG could be established to establish how Environmental Principles could be brought into work within the European region on food standards and food control and report to the next session.

Develop toolkits

The UK tabled a discussion paper at CCGP33^[4] which noted the potential value of toolkits in supporting strategic goal 3: *to increase the impact through the recognition and use of Codex standards*. Applied to sustainability, toolkits could be used to turn theory into practice with a view to ensuring greater consistency and coherence in our region. CCEURO members may want to consider whether there is a role for this committee to develop such toolkits that could offer practical assistance with the transformation to a more sustainable food system regarding matters of food standards and food control.

Create a repository

Repositories are used to store useful information or data that can be easily and readily accessed by interested parties. In September 2019 CCEURO agreed to set up a food fraud repository for its members to share relevant information, including for example contact points in each country. Given that CCEURO members are tasked with transforming their food systems it may be helpful to create a repository relating to food standards and food control so that members can share details of their successes. However, the value of such a repository may be enhanced through the development of a template so that relevant and appropriate information is included in a structured format.

Dialogue with industry and stakeholders

There may be value in hosting a dialogue with industry and other stakeholders to identify barriers to adopting more sustainable practices that Codex could help to resolve in food standards and food control. This may lead to new work or suggestions for the revision/amendment of existing standards or guidelines. This could result in the development and amendment of Codex standards, which could help address issues identified. This could be through providing reassurance to industry and other stakeholders that changes in practices can occur that consider the environment without compromising food safety.

⁴ [Discussion paper on practical toolkits to promote the use of codex standards and guidelines.](#)

CCEURO33 is invited to:

- i Consider if Members in the region find merit in the options proposed to further sustainability work in the European region.
- ii Express any preferences for one or more options to pursue.
- iii Decide on the appropriate next steps.

Annex 1

This Annex provides further detail to support members in their consideration of the suggested options.

The Environmental Principles

In the UK, Ministers of the Crown are placed under a duty to consider a set of five environmental principles when making policy. The principles are not rules and they do not dictate policy decisions by ministers. Environmental principles also appear in wider international legal frameworks, for example, the Rio Declaration of 1992.

- integration principle
- prevention principle
- rectification at source principle
- polluter pays principle
- precautionary principle

Repositories and potential toolkits

This section includes some examples of how the UK Government is addressing the challenges associated with transforming its food system across departments and in line with the Environmental Principles Duty. CCEURO members could put forward content for inclusion in the repository or as a basis for the development of a CCEURO toolkit. For example, in support of the environmental principles duty, the UK government developed a policy makers template to provide guidance on appropriate consideration of the duty. CCEURO may want to consider developing a toolkit for potential guidance applicable to the region.

Example One: The Food Data Transparency Partnership (FDTP)

The FDTP is a long-term partnership between government, industry and experts that aims to drive positive change in the food system through better and more transparent food data. For Defra, the focus of the partnership is on increasing the transparency of environmental impact data.

Many food and drink businesses currently struggle to quantify their supply chain emissions. The FDTP is working to address this by standardising the methodology and data sources used for measuring GHG emissions of food and drink at a company level (scope 3 emissions) and at a product level, so emissions can be communicated in a consistent and comparable way.

This will enable the food and drink industry to reliably monitor progress, focus efforts towards achieving net zero, and streamline the reporting process for businesses. More consistent measurement will also enable government, civil society and investors to compare performance on greenhouse gas emissions fairly and recognise and support good practice.

Example Two: Eco Labelling

As part of the Food Data Transparency Partnership, the UK is developing a mandatory methodology for voluntary eco-labelling of food and drink to standardise approaches across existing and emerging schemes. We are working with stakeholders through the FDTP and beyond to create a standardised methodology for businesses to follow if they choose to use eco-labels on their food products to provide product level environmental impact information to consumers.

Through this policy we aim to limit the potential for false or misleading environmental claims ('greenwashing'). In the longer term, we expect this to lead to greater use of eco-labels, increased consumers trust of these labels, and, in turn, a shift towards sustainability in supply chains decisions and consumer choices.

Industry and stakeholders: Addressing barriers to sustainable practices

Exploration of the industry and stakeholder view on whether existing national/international standards could be safely modified to promote more sustainable practices could be conducted. There would also be value in identifying new work that actively encourages or promotes sustainable practices, similar to the recent proposal on recycled packaging. Previous consultations indicate that CCEURO members would prefer Codex to actively support transformation, this option would inform further thought on how we might work in partnership with industry and stakeholders to achieve this.

Dialogue with industry and other relevant stakeholders could both invite them to propose revision of standards on sustainability grounds and seek to find out where they would like Codex to take the lead on providing the evidence and assurance that food safety will not be compromised.