



fighting heart disease  
and stroke

european heart network

## **European Heart Network (EHN) response to “The reform of the CAP towards 2020 - Impact Assessment”**

*January 2011*

The European Heart Network is a Brussels-based alliance of heart foundations and likeminded non-governmental organisations throughout Europe, with member organisations in 26 countries. The EHN plays a leading role in the prevention and reduction of cardiovascular diseases, in particular heart disease and stroke, through advocacy, networking, education and patient support, so that they are no longer a major cause of premature death and disability throughout Europe.

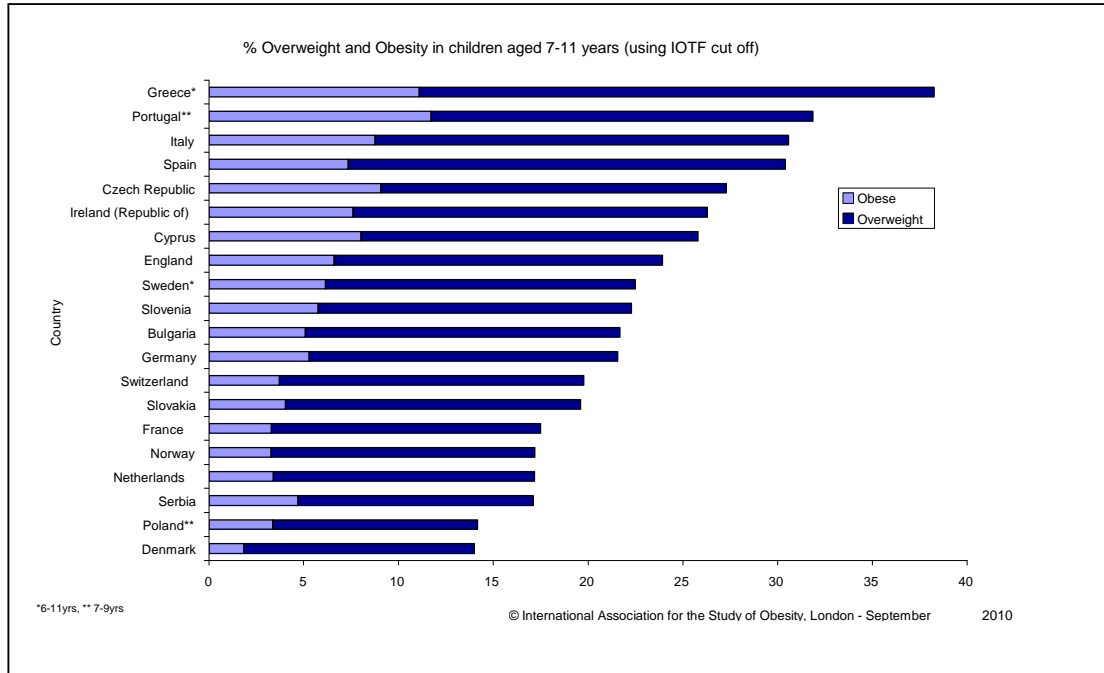
The European Heart Network (EHN) believes that the Common Agriculture Policy (CAP) can play a profound role in improving health and tackling health inequality, but to do this requires a systematic reform. Production of food and agricultural policy are important social determinants of health. The way that our food is produced, processed, distributed, marketed and what is consumed has a major impact on Europeans health and has far reaching consequences in terms of Global health and food security. An increasing body of evidence shows that factors such as availability, accessibility and price play a predominant role in food choice. Policies need to support making the healthy choice the easy choice<sup>1</sup>. The CAP is an important European policy, but needs to change to reflect current and future challenges and be relevant for its citizens. EHN would also like to stress that currently chronic diseases are a significant burden in the EU and represent a major barrier to sustainable development in the EU. Cardio-vascular disease (CVD) alone costs the EU economy € 192 Billion each year.<sup>2</sup> Diet is one of the primary modifiable determinants and an integrated food and agriculture policy is necessary to tackle chronic disease.

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<sup>1</sup>Foresight: Tackling Obesity: Future Choices - Project Report (2007), Government office for science, London, 2nd edition.

<sup>2</sup> European Heart Network (2008) European cardiovascular disease statistics 2008, European Heart Network, Brussels.

Overweight and obesity are currently of particular concern, especially in childhood. An estimated 22% of children aged 5-9 years are overweight (of which 6% are obese) and 16% of children aged 13-17 years are overweight (of which 4% obese) in Europe<sup>3</sup>. Increasing rates of overweight and obesity will put increasing pressure on health care and social costs. Prevention in early life is the most cost effective strategy and requires addressing both diet and physical activity. Rates of obesity exhibit huge social inequalities between and within EU Member States.



EHN welcomes the opportunity to contribute to the Consultation Document for Impact Assessment on the reform of the CAP towards 2020. Although EHN recognises the wide range of issues and challenges that CAP agriculture towards 2020 and the corresponding impact assessment must deal with, this consultation response will focus on public health gains as one of the valuable outcomes of a reformed CAP.

## Questions

- (1) **Are the policy scenarios outlined consistent with the objectives of the reform? Could they be improved and how?**

We welcome and broadly accept the objectives put forth by the communication on the reform of the CAP and applaud the Commission for recognising that CAP can play a role in preventing diet-related chronic disease by making healthy and nutritious foods more readily accessible. The World Health Organisation (WHO) estimates that 80% of cardiovascular diseases, 90% of type 2 diabetes and 30% of all cancers could be prevented by a healthy

<sup>3</sup> Lobstein, T. and Frelut, M. L. (2003). Prevalence of overweight among children in Europe. *Obes.Rev.*, 4, (4) 195-200

diet<sup>4</sup>. EHN would also like to stress that health and well being are explicitly related to loss of biodiversity, environment and climate change, and that addressing these objectives in a consistent manner would provide multiple benefits including a healthier workforce and more inclusive growth.

Building on the text, EHN suggest that the headlines in Section 3 should read:

- Developing the agricultural production capacity on a sustainable, equitable and ethically sound basis throughout the EU
- **Ensuring food security, safety and quality in a manner consistent with public health, environmental and ethical standards and equity**
- Ensuring the provision of public goods through sustainable management of farming systems, inclusive food systems natural resources and the preservation of the countryside
- Contributing to the vitality of rural areas and territorial diversity throughout the EU.

Based on this a policy scenario for sustainable development needs to be devised which drawing on elements from the 3 proposed scenarios and focusing on a thoroughly revised policy framework to meet these 4 objectives.

- The Single Payment Scheme (SPS) needs to be changed so that payments are conditional on a minimum set of good agriculture practices, environment and public health criteria to ensure that EU goals for sustainable development are met. Additional payments can be received for specific environmental or public services supporting strategic issues or national priorities.
- The SPS should be harmonized to achieve equality of payments between and within Member States. More equality in Members States can be achieved by capping payments for single beneficiaries and making them subject to conditions relating to environmental, public health and social goals i.e. employment.
- Market measures should incorporate a food systems approach, strengthening the position of consumers and farmers, taking special care not to disrupt developing markets or undermine food security. Risk management, in addition to developing better instruments to deal with crisis, should focus on longer term goal of increasing the resilience of farming systems and develop new market mechanisms that support local and regional markets.
- Rural development funding should focus on new challenges, agro – ecological innovation and on social and economic development including improved access to health care services in rural regions, especially weaker rural regions.

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<sup>4</sup> World Health Organization (2008) 2008-2013 Action Plan for the Global Strategy for the Prevention and Control of Noncommunicable Diseases, World Health Organization, Geneva.

- A strengthened approach to strategic targeting should be developed and policy coherence with EU goals relating to public health, regional development and inclusive growth should be ensured.
- (2) **Are there other problems apart from those set in the problem definition section of this document that should be analysed when considering the architecture of the CAP in the post 2013 period? What causes them? What are their consequences? Can you illustrate?**

EHN believes that the following issues should be brought into the analysis to meet the objectives as defined:

- **Non-sustainable overall levels of consumption and consumption patterns:** Current consumption patterns in the EU are not sustainable from a point of view of public health and chronic disease, food security and climate change. An agriculture policy which only focuses on technology to increase production and mitigate agriculture's impact on climate cannot meet these challenges<sup>5</sup>. Changes in global consumption patterns, primarily increased consumption of meat and dairy in developing economies (Nutrition transition)<sup>6</sup> lead to overreliance on feed stuffs and less nutritional quality. This has resulted in a rise in poor health outcomes such as obesity and other diet related conditions due to high fat consumption. The rise in meat and dairy production and consumption has also contributed to a rise in agricultural production of animal feeds and less nutritional efficiency in the overall food production process. These challenges mean that production and consumption patterns will increasingly need to move towards plant based diet and policies and instruments should take this into consideration.
- **Separate sustainable production and sustainable consumption agendas:** Neither policies promoting sustainable production of food nor campaigns encouraging healthier, more sustainable diets are enough. Production policy can drive consumption and consumption patterns can lead to more sustainable production, and a more integrated approach is needed to reach the goals for a more sustainable food system. Much more can be done to create links between production and consumption through public procurement policy, nutrition programmes i.e. the EU School Fruit Scheme (EU SFS) and the Most Deprived Persons Scheme (MDP), and catering policy. Programmes and creative action in this field could help enormously to promote affordability and accessibility of high quality, natural, healthy, nutritious and regionally and locally sourced foods, but such action is currently inhibited by EU regulations and trade rules. CAP promotion budgets should give preference to foods which support the EU public health nutrition objectives (such as whole grains, fruit

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<sup>5</sup> Friel S, Dangour AD, Garnett T, Lock K, Chalabi Z, Roberts I, Butler A, Butler CD, Waage J, McMichael AJ, Haines A., Public health benefits of strategies to reduce greenhouse-gas emissions: food and agriculture. *Lancet*. 2009 Dec 12;374(9706):2016-25.

<sup>6</sup>Popkin, B. M. (2001). Nutrition in transition: the changing global nutrition challenge. *Asia Pac.J.Clin.Nutr.*, 10 Suppl, S13-S18

and vegetables, foods low in saturated fat, salt and sugar) and incentive should be provided which create synergies with the EU SFS and MDP schemes.

Unused promotion funds should be made available for public campaigns focusing on healthy diets. EHN believes that funds should not be allowed to be used to promote products that are not otherwise promoted as part of public health nutrition healthy eating goals.

- **Elimination of subsidies for products considered damaging to health:** Regarding public health, the CAP tools should not promote products regarded as damaging to health such as alcohol, whilst the EU increases efforts and funding to encourage its population to refrain from excessive alcohol consumption. Subsidies for production and promotion of alcoholic beverages are counterproductive public health measures in other EU policies to reduce harm caused by alcohol. Ending subsidies for promotion of alcoholic beverages would lead to greater consistency of the EU legislation and better spending practice of the EU budget. Nevertheless currently, (mainly through promotion strands) the EU subsidises promotion of alcohol. For instance, the production of wine alone receives €1.5 billion worth of support yearly through the Common Agricultural Policy (CAP)<sup>7</sup>. CAP subsidies for distillation of alcohol should be phased out in the next framework.

In addition, EHN supports the decision to phase out tobacco subsidies by 2012 and reinforce that support for tobacco production and processing should not be a part of CAP in the future.

- **Health and social equity:** Currently, social inequalities in health are a major barrier to improving population health, maintaining a healthy and productive workforce and ensuring sustainable growth. Inequalities-related losses to health are currently evaluated at €141 billion per year<sup>8</sup>. About 10 million people live below the poverty line in rural areas within the EU. They make up concentrations of poverty and exclusion among certain minorities, including many Roma people, particularly in the new Member States. In most countries, their needs are not effectively addressed by current rural development programmes. Approximately 21 million people suffer from food insecurity in the EU and substantial differences in health outcomes exist within and between Member States. Improved economic analyses of policies and programmes, that directly or indirectly affect health, social exclusion and distribution of these outcomes,<sup>9</sup> can strengthen action to reduce health inequities. In addition, programmes and evidence base for how food and farming need to be created.
- **Regional and local food systems:** Developing regional and local food systems can play a substantial role in more inclusive societies, better access to healthy diets and

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<sup>7</sup>Anderson, P. & Baumberg, B. (2006) 'Alcohol in Europe'. London: Institute of Alcohol Studies.

<sup>8</sup> "Economic implications of socio-economic inequalities in health in the European Union". J.P. Mackenbach, W.J. Meerdink, A.E. Kunst. Rotterdam, 2007

<sup>9</sup> Closing the gap in a generation. Report of the World Health Organization Commission on the Social Determinants of Health, Geneva, 2008

developing more resilient farming systems, but depend upon effective policy support in order to be viable and competitive.

- **Policy coherence:** There are current inconsistencies between policies, both within the CAP and between it and other EU programmes. A future strategy must ensure the coherence of policies across key priorities such as public health, sustainability and the environment.
- **Governance in the food system:** Concentration, inequities in bargaining power, commodity speculation and suboptimal price translation have had a negative impact on affordability of healthy diets for consumer. There is little evidence that transparency, monitoring of price translation, self regulation and codes of conduct are sufficient to provide adequate governance in the food chain. New more rigorous process need to be put in place.

**(3) Does the evolution of policy instruments presented in the policy scenarios seem to you suitable for responding to the problems identified? Are there other options for the evolution of policy instruments or the creation of new ones that you would consider adequate to reach the stated objectives?**

EHN believes that the challenges described in Section 2 of the impact assessment document call for a more dynamic and radical shift of policy than is implied in any of the three central scenarios. Farm incomes are depressed, the farm labour force is falling rapidly, health care costs related to chronic diseases are increasing, greenhouse gas emissions must be cut, loss of biodiversity must be halted, rural vitality must be revived, and public health and food safety must be assured. Gradual evolution of policy, given the challenges faced and speed and scope of change, will not be sufficient. The current reform must mark a decisive shift, into a new paradigm for agriculture and food systems.

- Reorientation from industrial farming, and highly processed foods to sustainable farming and natural foods of high nutritional quality, will require a clear definition of progressive standards of sustainability in agriculture; incorporation of these standards into updated legally binding codes of good practice, with efficient enforcement of these codes; conditionality related to those standards on future direct payments to all farmers; and updated farm advisory systems that encourages agro-ecological innovation
- Policies for food security, trade, aid and supply which together ensure food security for Europeans without compromising developing country farming systems and guarantee a return for farmers as outlined in the Rome and Lisbon Treaties
- Policies for food safety and quality linked to public health nutrition for reduction of food waste; and for promotion of regional and local production and processing of food, and related issues

**(4) What do you see as the most significant impacts of the reform scenarios and the related options for policy instruments? Which actors would be particularly affected if these were put in place?**

The question should be what are the desired impacts of reform and which policy scenario will be most effective in achieving the desired impacts.

Our answer to those questions would include:

- Improved access to and affordability of foods necessary for a healthy and sustainable diet, in order to support public health nutrition objectives
  - Reduction of social inequalities in rural areas
  - Further reduction of greenhouse gas emissions (through clear GHG limits in codes of farming practice)
  - Halt the loss of biodiversity in rural areas, by focusing farm and forest support systems on encouragement and extension of farming systems which enhance biodiversity
  - Secure a high level of delivery of public goods by encouraging the uptake of farm systems such as organic farming, high nature value farming and integrated production
  - Achieve a level “playing field” by strengthening the position of farmers and consumers and assuring fair production-cost-based prices for both groups
  - Maintain employment in farming, and support family farms, through the terms of farm support systems and create new employment opportunities through development of regional and local food systems
  - Reduce food waste by close analysis of all causes of that waste and use of regulations, education and public awareness to address these causes
  - Reduce food miles by promotion of local and regional food systems, and create better links between producers and consumers
  - Reduce dependence of EU farmers upon farm inputs from outside Europe by promoting more sustainable farm systems, low-input breeds, extensive low input (i.e. grass fed) production methods and production and use of animal-feed proteins within Europe
  - Reduce the emigration, especially for young citizens from rural areas to urban areas by action to diversify the rural economies and sustain services in these areas
  - Enlist the knowledge, capacities and resources of all stakeholders in the process of agricultural and rural development, by enabling local strategies and local partnerships to flourish throughout rural Europe.
- (5) **To what extent will the strengthening of producer and inter-branch organizations and better access to risk management tools help improve farmers’ income levels and stability?**

**(6) What environmental and climate-change benefits would you expect from the environment-targeted payments in the first and the second pillar of the CAP?**

EHN believes that targeted payments in the first and second pillar would lead to better delivery of ecosystem services. They must take into consideration maintenance and effective management of the rich and highly diversified heritage of ecosystems, cultural landscapes and other environmental assets including soil and water resources, which are found in the rural areas of the EU. Climate change left unchecked will have a profound effect on public health and well-being and early analysis suggests that it will impact hardest on less affluent countries. All elements of future policy, including (but not confined to) environment-targeted payments, should be designed to achieve that aim.

The EU is already committed to halting the loss of biodiversity, in itself a major challenge. Loss of biodiversity will have a profound effect on health and well-being especially in less affluent regions, and halting the loss of biodiversity should be reflected in cross-compliance and targeted payments. It is important that this includes biodiversity in general, but with a focus on “agriculture biodiversity”. The policy must also focus on the ‘new challenges’ of adapting to and mitigating climate change, generating renewable energy, cutting emissions of greenhouse gases, reducing dependence on fossil fuels and on inputs derived from those fuels, and putting good agronomic sense and agro-ecological innovation at the heart of farming decisions.

**(7) What opportunities and difficulties do you see arising from significant increase the rural development budget and reinforcing strategic targeting?**

**(8) What would be the most significant impacts of a "no policy" scenario on the competitiveness of the agricultural sector, agricultural income, environment and territorial balance as well as public health?**

EHN believes that a “no policy” scenario would have devastating social, economic and environmental consequences and lead to further intensification of production in order to sustain competitiveness. The number of farms, and the farm labour force, would be drastically reduced resulting in loss of employment. Territorial balance would be destroyed, migration from rural to urban areas would accelerate, with serious consequences for unemployment, urban crowding, public health and pressure on public services.

**(9) What difficulties would the options analysed be likely to encounter if they were implemented, also with regard to control and compliance? What could be the potential administrative costs and burdens?**

**(10) What indicators would best express the progress towards achieving the objectives of the reform?**

- Socio-economic status of people working in the agricultural sector.
- Income inequality/Gini coefficient between people working in non-agricultural and agricultural sector.
- Food production levels by sector and type of production (eg intensive, organic etc)



- Indexed production costs, consumer food prices, added value and profit margins by sector
- Indicators relating to food consumption for specific foods per country and disaggregated by gender, age and socio-economic-status;
- % of population facing food insecurity
- Farm-gate prices of farm products covering full costs of sustainable production, and reduced volatility in those prices
- Levels of compliance for standards of sustainable farming
- Improved conservation and sustainable use of biodiversity, also within farming practices
- Measures of biodiversity in general and more specific agricultural biodiversity
- Emission of greenhouse gases by the agriculture sector broken down by sector
- Levels of carbon sequestration for agriculture
- Levels of nitrogen loss
- Levels of regional self-sufficiency (Imports and exports)
- Levels of food waste
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- Levels of rural poverty

**(11) Are there factors or elements of uncertainty that could significantly influence the impact of the scenarios assessed? Which are they? What could be their influence?**

- The pace of recovery from the present economic crisis, particularly in the eurozone. Delays in the recovery could seriously constrain the willingness and ability of Member States to contribute own share to the measures described in the scenarios or in our answers above. Special attention should therefore be given to co-financing and how this will impact on implementation in Member States.
- Intensity speed and impact on climate change on agricultural production. Rapid changes in climatic norms, or rapid increase in the incidence of climatic extremes (storms, floods, droughts, extreme cold or heat), which could disrupt farming, food markets, forests, ecosystems, infrastructure etc

**1. PRACTICAL INFORMATION:**

Consultation is open until 25th January 2011. Contributions should be sent to the functional mailbox [agri-cap-post-2013-consultation@ec.europa.eu](mailto:agri-cap-post-2013-consultation@ec.europa.eu)

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