

ClientEarth's response to the Roadmap for a Farm to Fork Strategy

Addressing procedural and substantial inconsistencies in the Roadmap for a Farm to Fork Strategy

ClientEarth welcomes the initiative of the European Commission (the Commission) to support the transition towards sustainable and environmentally positive food systems through the Farm to Fork Strategy and appreciates the opportunity to provide its views on the Roadmap.

Food system thinking¹ and food policy approach – meaning a policy that encompasses all food-related issues, ranging from agricultural performance to nutrient intake - are not new² but only recently they have gained increasing attention by policy-makers. Driving the transformation towards sustainable and environmentally positive food systems requires deep changes at multiple levels, taking into account the interactions between policies and processes at global, regional, national and local levels. Such a complexity calls for a more holistic approach, ensuring wider policy coherence and coordination among all the strands of the European Green Deal (EGD).

This response will:

1. Raise a procedural point, emphasising that a public consultation process must be conducted prior to the adoption of the Farm to Fork Strategy;
2. Identify, across different policy areas, gaps and weaknesses that, if not addressed, will jeopardise the success of the Farm to Fork Strategy.

¹ Reflecting research developments in the field of systems science (please, refer to, inter alia, Robert L. Flood, Ewart R. Carson (1993), *Dealing with Complexity: An Introduction to the Theory and Application of Systems Science*. Plenum: New York; Andreas Hieronymi (2013), *Understanding Systems Science: A Visual and Integrative Approach*, in *Systems Research and Behavioral Science*, Vol. 30, pp. 580–595. Available at: <https://onlinelibrary.wiley.com/doi/epdf/10.1002/sres.2215> (last access 25th February 2020)), food system thinking understands food as part of a system rather than existing in isolation. Consequently, all the activities carried out along the food supply chain can be connected and placed in their environmental, social, economic context.

² For instance, already in 1983 the World Bank described the so-called food policy analysis approach in one of its publications, i.e. C. Peter Timmer, Walter P. Falcon, Scott R. Pearson (1983), *Food policy analysis*, Washington, D.C., The World Bank. Available at: <http://documents.worldbank.org/curated/en/308741468762347702/Food-policy-analysis> (last access 25th February 2020).

1. A public consultation process must take place prior to the adoption of the Farm to Fork Strategy

A successful Farm to Fork Strategy needs to remove all the relevant obstacles to the transition towards sustainable food systems. This can be done only if the challenges that should be addressed at European Union level are identified through public or stakeholder consultation.

Taking decisions in an open manner and as close to the citizens as possible - Article 1(2) TEU, Article 15 TFEU - as well as the need for an open and transparent dialogue with civil society - Article 11(2) TEU - are fundamental objectives under the EU Treaties. Public consultations are an essential procedure to achieve these objectives on proposed EU measures.

Moreover, the Farm to Fork Strategy represents a plan or programme relating to the environment, therefore requiring public or stakeholder consultation prior to its adoption, pursuant to Article 7 of the Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters (the Aarhus Convention). As explained in the Aarhus Convention Implementation Guide, Article 7 covers “complex strategies” that are “intended to help to protect the environment.”³ The F2F Strategy clearly falls under this definition, as confirmed by its objective as defined in the Roadmap: “[t]he overall objective of the strategy is to accelerate the transition towards a sustainable food system that should have a neutral or positive environmental impact, is capable to adapt to climate change and at the same time contributes to climate change mitigation, ensures food security and creates a food environment which makes healthy diets the easy choice for EU citizens”.

While the Roadmap appears to acknowledge the importance of public participation, it then envisages that “[c]onsultations with a wide range of stakeholders and citizens will take place after the publication of the Strategy in the context of the elaboration of individual initiatives proposed”. Firstly, a consultation on the strategy cannot happen after the publication of the strategy itself. This would represent a failure to comply with the above-mentioned Article 7, Aarhus Convention, which requires that the outcome of the public participation procedure is taken into account in the elaboration of the plan/programme concerned. Secondly, stakeholders and citizens consultations on the specific initiatives that will be launched by the Farm to Fork cannot be considered as substitutes for a consultation on the wide strategy that the Farm to Fork represents. Nor can previous consultations of selected stakeholders - such as the workshop that took place in February 2020 in the context of the Scientific Advice Mechanism’s opinion “Towards an EU Sustainable Food System” - be considered equivalent to a public consultation.

ClientEarth appreciates the effort by the Commission to promptly act but this cannot justify the failure to provide public participation in environmental decision-making: a proper public participation procedure must take place prior to – and not after - the adoption of the Farm to Fork Strategy. The very timing of this Roadmap consultation, closing at a date when significant inter service consultation is known to have already occurred, undermines any notion that public input is valued in the process.

³ *The Aarhus Convention: An Implementation Guide*, 2nd ed. (United Nations publication, Sales No. E.13.II.E.3), available from <http://www.unece.org/env/pp/implementation_guide.html>, p. 176.

2. Concerning gaps and weaknesses potentially jeopardizing the success of the Farm to Fork Strategy

ClientEarth would like to take the opportunity provided by this Roadmap to emphasise the following elements on which EU action is needed to achieve the objectives of the EGD:

- Fully aligning the Common Agricultural Policy and the objectives of the EGD and adequately supporting farmers in the transition towards sustainable agricultural practices;
- Ending overfishing, addressing destructive fishing and reducing unsustainable fish consumption;
- Promoting environmentally-responsible aquaculture;
- In the seafood supply chain, encouraging business leadership towards implementation of responsible practices, ensuring clear and consistent labelling and promoting traceability;
- Adopting a Zero-pollution Action Plan for air, water and soil in the context of agriculture;
- Delivering food without harmful chemical residues, including leakage from food contact materials;
- Reducing use and dependency on agro-chemicals;
- Ensuring that the Farm to Fork Strategy works in harmony with, and does not seek to undermine the Biodiversity Strategy;
- Reducing use and dependency on single-use plastics, aligning the Farm to Fork Strategy with the Circular Economy Action Plan.

Fully aligning the Common Agricultural Policy and the objectives of the EGD and adequately supporting farmers in the transition towards sustainable agricultural practices

The Common Agricultural Policy (CAP) is crucial to implement the Farm to Fork Strategy and to deliver on the ambitious objectives of the EGD. “Greening the CAP” – “examination of the draft national strategic plans, with reference to the ambitions of the European Green Deal and the Farm to Fork Strategy”⁴ - is identified as one of the key actions to ensure the success of the European Green Deal, as highlighted also by the European Parliament in its Resolution on the EGD⁵. ClientEarth echoes the EP’s Resolution, asking the Commission to provide a thorough analysis of

⁴ Annex to the EGD, p. 3.

⁵ European Parliament resolution of 15 January 2020 on the European Green Deal (2019/2956(RSP)), P9_TA-PROV(2020)0005. Available at: https://www.europarl.europa.eu/doceo/document/TA-9-2020-0005_EN.pdf (last access 3rd March 2020).

the “contribution of the current CAP reform proposal to the EU’s environmental, climate, and biodiversity protection commitments in order to fully align it to the goals set in the European Green Deal”⁶. The Roadmap points out that the Farm to Fork Strategy “will be accompanied by other Commission documents relevant for the design of future actions”: ClientEarth expects to see, included in these documents, the abovementioned scrutiny on the current CAP reform against the objectives of the EGD.

The celebratory tone used by the Commission in its Roadmap when stating “[...] the transition into more sustainable food systems, including through the Common Agricultural Policy [...], is ongoing” does not adequately reflect the reality of primary production. The current Proposal from the Commission for a CAP Strategic Plans Regulation (CAP SP Regulation) fails to address the climate crisis and the biodiversity crisis. The specific objectives under Article 6, CAP SP Regulation, are too broadly defined to effectively direct the agricultural strategies within the Member States and no specific criteria for the approval by the Commission of the National Strategic Plans (NSPs) is identified in Article 106, CAP SP Regulation. If not supported by EU-level SMART targets - on, *inter alia*, GHG emissions, inputs management, farmland biodiversity - accompanied by robust monitoring and progress reporting, the New Delivery Model will *de facto* leave to Member States to decide where the bar of ambition for the climate and the environment should be set⁷.

On the contrary, the challenges that we face call for a high and even level of environmental protection across Europe. The Commission⁸ has still the power to amend⁹ the CAP SP Regulation in order to include EU-wide targets¹⁰ against the specific objectives under Article 6. Alternatively, the Commission should use the opportunity provided by the Farm to Fork to commit to further legislation on this matter, ensuring that NSPs are approved only if in line with the objectives of the EGD. In this regard, it is not clear, from the Roadmap, how the Commission intends to ensure that the NSPs will “reflect the ambition of the Green Deal”. Furthermore, the Roadmap announces measures related to the use and risk of chemical pesticides, use of fertilizers and use of antibiotics. While positively receiving these initiatives, it is essential that the Farm to Fork Strategy takes into account, and proposes concrete actions on the whole set of environmental externalities that stem from agricultural activities, including soil degradation, pressure on water resources, air pollution and biodiversity loss.

Finally, farmers need to be supported in order to play an active role in the transition towards sustainable food systems. Agroecology and, more generally, regenerative agricultural practices, are knowledge intensive and require independent and experienced advisors able to transfer the necessary expertise to farmers. Article 13, of the CAP SP Regulation, on Farm Advisory Services (FAS), does not specify the requirement of independency for advisors¹¹ or mention agroecology among the areas covered by FAS. The Roadmap does not address this issue and does not

⁶ European Parliament Resolution on the European Green Deal, par. 58.

⁷ For further details as well as to scrutinise the whole set of ClientEarth’s proposals for a greener CAP, please refer to: <https://www.documents.clientearth.org/library/download-info/securing-the-environmental-ambition-of-the-cap/>

⁸ And the co-legislators.

⁹ Judgment of the Court (Grand Chamber) of 14 April 2015, Council of the European Union v European Commission, C-409/13, para 74.

¹⁰ Among the options for amendments of the CAP SP Regulation to include EU-wide targets, for instance, amendments to Article 6, or Article 106 or improvement of Annex I on the system of indicators.

¹¹ Pursuant to Article 13, CAP SP Regulation, advisors have to be “impartial” and with “no conflict of interests”.

mention any ongoing evaluations or reports concerning the FAS whose results will be taken into account by the Farm to Fork Strategy. We urge the Commission to use the opportunity of the Farm to Fork Strategy to carry out a new study scrutinising how the FAS has been applied in the past ten years¹² and, benefitting from these results, to develop an improved system, adequate to the environmental challenges that we face.

Ending overfishing, addressing destructive fishing and reducing unsustainable fish consumption

A holistic and effective Farm to Fork Strategy must address the problem of unsustainable and destructive fishing. Fishing was identified as one of the main causes of marine biodiversity loss in last year's authoritative UN IPBES global assessment report on biodiversity¹³ and ecosystem services.

The Farm to Fork Strategy should address wild fisheries, including targets for the following goals: (1) Ending overfishing and restoring all fish populations commercially exploited to sustainable levels where they can reproduce safely with a surplus we can harvest; (2) Shifting from fuel-intensive, non-selective and destructive fishing, such as bottom trawling, to low impact fishing.

On this line, another element of great concern is the promotion of the consumption of fish as a low-carbon alternative to meat in the EGD and in the Farm to Fork. Given that the EGD and its subsequent strategies are meant to address both the biodiversity and climate crises together, it would be counterproductive to promote fish consumption in the Farm to Fork Strategy without consideration for the harmful environmental impacts of the fisheries and aquaculture sectors.

First of all, fisheries' impacts on marine ecosystems have serious consequences on the ocean's ability to cope with climate change, which is seldom considered when looking at the carbon footprint of seafood production. It has been shown, for instance, that seagrass meadows, which are regularly destroyed by bottom trawling, can capture CO₂ 35 times faster than a tropical forest.

Secondly, the Roadmap assumes that there is an indisputable association between "sustainable" and "healthy", which is not exact. It is not scientifically accurate to say that the consumption of fish is insufficient in Europe, as stated in the current draft of the Farm to Fork Strategy. Member States guidelines for weekly fish consumption are on average around 300g of fish per week and inhabitant for a healthy and balanced diet¹⁴, which amounts to about 15.6 kg/inhabitant/year. European Commission statistics show that EU citizens eat on average 25.1 kg/inhabitant/year, which is 40% more than what Member States' health guidelines promote. On the one hand, for the last 15 years, research has been carried out on contaminants in the food chain - including in

¹² The last report on the application of the FAS dates back to 2009. Report from the Commission to the European Parliament and the Council on the application of the Farm Advisory System as defined in Article 12 and 13 of Council Regulation (EC) No 73/2009, Brussels, 15.11.2010 COM(2010) 665 final. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52010DC0665&from=EN> (last access 26th February 2020). The last report on the application of the FAS dates back to 2009.

¹³ [UN IPBES global assessment report on biodiversity](https://www.ipbes.org/global-assessment-report-on-biodiversity/)

¹⁴ <https://ec.europa.eu/jrc/en/health-knowledge-gateway/promotion-prevention/nutrition/food-based-dietary-guidelines>

fish¹⁵ -; on the other hand, recommendations on fish consumption have recently¹⁶ changed for vulnerable population. Fish consumption guidelines might be adjusted accordingly and potentially promote a reduction in fish consumption due to the accumulation of contaminants including, potentially, of microplastics. From a health perspective, it does not seem appropriate either to promote fish consumption as an alternative to animal. In this regard, two elements should be taken into consideration: (1) only sustainable fish and seafood should be promoted; (2) community based management systems to manage inshore fisheries should be implemented, as fish remains the main source of protein for vulnerable groups in many areas of the world, where there are no alternative opportunities.

Finally, on a general note, the Roadmap uses the word “fishermen”. Considering the range of roles that women play in the fishing community and industry, the contributions of women should not be undervalued and unrecognised. Therefore, we suggest the use of the word “fishers”, replacing “fisherman”.

Promoting environmentally-responsible aquaculture

If done properly, aquaculture has the potential to be a more sustainable source of fish and seafood. However, current aquaculture feed still includes a high percentage of fishmeal and oil deriving from wild fisheries, thus adding additional pressure on wild fish stock, rather than alleviating them. In addition, escapees from aquaculture farms and nutrient loading have significant environmental effects on marine habitats and species. The systematic use of the word ‘sustainable’ in front of aquaculture is not sufficient to effectively address the environmental impacts of aquaculture production. On the one hand, targets are needed to address additional issues beyond antimicrobial resistance, such as feed, nutrient loading and escapees; on the other hand, aquaculture can be incentivised through robust and credible third-party certification schemes, that pursue GSSI recognition as a means of demonstrating alignment with FAO Guidelines.

In the seafood supply chain, encouraging business leadership towards implementation of responsible practices, ensuring clear and consistent labelling and promoting traceability

The Roadmap on the Farm to Fork Strategy does not mention the role of businesses in boosting environmental responsible practices for production and marketing of seafood products. Companies can leverage their sourcing power to drive change within their own supply chains, by committing to implementing responsible sourcing practices. When faced with decisions to make on where to source their products from, companies should adopt a due diligence approach and identify risks in their supply chains and modify their purchasing decisions or investing in improving the fishery that they source from.

¹⁵ <https://www.sciencedirect.com/science/article/pii/S1382668908000914>

¹⁶ <https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2005.236>;

In order to promote sustainable seafood consumptions, consumers need to be empowered, allowing them to make informed purchasing choices. All seafood products sold in the EU should strictly follow the CMO Regulation¹⁷, providing information pursuant to Article 35, CMO Regulation. ClientEarth is concerned by the fact that there is persisting evidence in the EU that this regulation is not being properly implemented, and that seafood products put on the market are often missing compulsory information or are illegible. This greatly undermines purchasers' ability to make informed decisions that potentially incentivise seafood products caught (or farmed) responsibly.

Sea to plate traceability is also key. In order to make sure that seafood products come from sustainable sources and reduce the risk of fish illegally caught to enter the market, is to promote traceability. Traceability is a key tool to make sure that operators along the seafood supply chain - fishers, seafood traders, processors, retailers - always know where the fish comes from. Given the complexity and global nature of seafood supply chains, mechanisms that ensure a "sea to plate" tracing of the fish are essential to establish a connection between a sustainable source and a responsible buyer. One of the way to do that and reduce risks is through robust and credible third-party certification schemes, that pursue GSSI recognition as a means of demonstrating alignment with FAO Guidelines can also be of help to ensure that products are traceable.

Adopting a zero-pollution action plan for air, water and soil in the context of agriculture

The current Roadmap for the Farm to Fork Strategy does not sufficiently address the issue of air pollution, as part of the zero-pollution action and as an important aspect of EGD. The Roadmap does not address neither the air pollution issues in existing legislation. We see this as a significant gap that should be rectify.

In our view, the Farm to Fork Strategy should address air pollution issues from agriculture by fully integrating the need to tackle, mainly, ammonia pollution and methane pollution¹⁸. On the one hand, ammonia reacts with nitrogen oxides and sulphur dioxide in the air and forms secondary particulate matter (PM2.5), dangerous to human health. The dry and wet deposition of ammonia results in eutrophication and acidification of natural ecosystems, leading ultimately to a loss of biodiversity. Methane, on the other hand, is a short-lived greenhouse gas with a 28 times higher global warming potential than CO₂ and it is a precursor of Ozone, that is being highly health damaging via inflammation in the respiratory tract, causing increased mortality, and also contributing to significant crop losses in Europe.

In Europe, most ammonia emissions and around half of the methane emissions result from agricultural activities. It is therefore essential for protection of both human health, biodiversity and the wider environment (including crops in agriculture) to address the issue of ammonia and

¹⁷ Regulation (EU) 1379/2013 on the Common Organisation of the Markets of Fishery and Aquaculture Products (CMO).

¹⁸ Despite not being the specific focus on this paragraph, also pesticides pollution should be taken into account. For further details, please, refer to Génération Futures, *Des Pesticides Perturbateurs Endocriniens, Cancérigènes Mutagènes Et Reprotoxiques Dans L'air En France*, February 2020. Available at : <https://www.generations-futures.fr/wp-content/uploads/2020/02/pesticides-air-expert-11-bd.pdf> (last access 16th Marc 2020).

methane from agriculture. While ammonia has been currently addressed by the NEC directive¹⁹, methane, so far, is not among the pollutants included in one of the three pillars of the EU Air Quality legal framework²⁰. The current Farm to Fork Strategy gives an excellent opportunity to fill this gap and, not only enforcing and accelerating the ammonia emissions reduction commitments, but also ensuring that methane emissions from agriculture are addressed.

Finally, it is essential to use the Farm to Fork Strategy to initiate a transition for the EU livestock farming in the direction that will reduce the ammonia and methane pollution. The potential measures may include: (1) Improved storage of slurry, manure heaps and digestates; (2) Low-emission techniques for spreading farm manure; (3) Emission reduction strategies through optimised feeding and keeping of livestock including the number reduction²¹; (4) improve nutrient use efficiency in order to combat eutrophication of watercourses and contamination of soil.

Delivering food without harmful chemical residues, including leakage from food contact materials

The Roadmap for a Farm to Fork Strategy does not address the issue of chemical pollution, although a coherent approach to the production and use of chemicals requires a long-term and concrete action plan across all the strands of the European Green Deal.

ClientEarth expects the Farm to Fork Strategy to deliver a new EU legislation on Food Contact Materials (FCM), which addresses harmful chemicals in all materials that come into contact with food and learns from the restrictions and processes adopted under other EU regulations, including REACH. On the basis of the ongoing REFIT, the new regulatory framework for FCM should, on the one hand, ensure the safety of our food adopting cut-off criteria for SVHCs and non-threshold chemicals - including endocrine disruptors -; on the other hand, it should enact EU-level harmonised rules on chemicals in paper, card, inks, glues and coatings. Such new EU legislation should be coherent with REACH and requires urgent actions given that parts of the food industry are moving away from plastic packaging towards other - less regulated - materials.

Finally, a legally binding obligation to ensure traceability throughout articles' life-cycles should be established, as a fundamental tool to prevent the presence of highly toxic chemicals in consumer products, including food packaging. Tracking is currently made solely on a voluntary basis by very few sectors, in a non-harmonised hence not most effective way. On the contrary, "any supplier" should be responsible for sharing data "with sufficient information to allow safe use" of the chemicals contained in the product, during the whole life cycle.

¹⁹ Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants (NEC Directive).

²⁰ [Directive 2008/50/EC](#) on ambient air quality and cleaner air for Europe, NEC Directive and sectoral laws addressing various pollutions sources.

²¹ For more details please see among others: Methane and Ammonia Air Pollution - Policy Brief prepared by the UNECE Task Force on Reactive Nitrogen, May 2015 <https://bit.ly/3aJw6ZC>; Technical and organisational possibilities to reduce ammonia, Clean Air Farming The Project (LIFE17 GIE/DE/610 Air & Agriculture), <https://bit.ly/3aIXjf5>

The use of chemicals in food and food contact materials should follow the principle of green chemistry to ensure safety by design.

Reducing use and dependency on agro-chemicals

ClientEarth welcomes the Commission's initiative to set a target for the reduction of pesticides. Such a target should be as ambitious as possible: by 2030, pesticides use should be reduced by 80%.

The Commission, as guardian of the Treaties, has the responsibility to tackle the implementation deficit of the Plant Protection Products Regulation and of the Sustainable Use Directive and launch infringement proceedings against documented abuse²². In compliance with the precautionary principle, both active ingredients and pesticides products need to be assessed for carcinogenicity and long-term toxicity, adopting risk assessment methods that are overhauled to be scientifically rigorous and objective. Furthermore, not only, a full mapping of pesticides use in the EU should be done, properly implementing the Sustainable Use Directive, but the Commission should also stop the possibility to export pesticides that are banned in the EU.

Ensuring that the Farm to Fork Strategy works in harmony with, and does not undermine the Biodiversity Strategy

Biodiversity is essential to human well-being. Despite ongoing efforts, biodiversity is in crisis, with 1 million species of plants and animals at risk of extinction. Urgent action is needed to tackle the underlying threats to biodiversity posed by unsustainable agriculture.

In addition to the impact of the drivers mentioned above, the IPBES global assessment explains that "Harmful economic incentives and policies associated with unsustainable practices in fisheries, aquaculture, agriculture (including fertilizer and pesticide use), livestock management,, are often associated with land-/sea-use change and overexploitation of natural resources, as well as inefficient production and waste management. ... policy reforms to deal with such causes of environmental harm offer the potential to both conserve nature and provide economic benefits, including when policies are based on more and better understanding of the multiple values of nature's contributions". The same report found that the environment can be safeguarded by "mainstreaming biodiversity and sustainability across all extractive and productive sectors, including mining, fisheries, forestry and agriculture, so that together, individual and collective actions result in a reversal of the deterioration of ecosystem services at the global level".

²² The 2018 study carried out for the Commission in the context of the Plant Protection Product REFIT and the report of the Commission on the Sustainable Use Directive has identified poor implementation by Member States as a major barrier for achieving the goals to protect human health and the environment of the Pesticides Regulation.

It is essential that the Farm to Fork Strategy takes into account, complements, and crucially does not undermine efforts to urgently and radically upscale efforts to protect and restore biodiversity, including those in the Biodiversity Strategy.

Reducing use and dependency on single-use plastics, aligning the Farm to Fork Strategy with the Circular Economy Action Plan

Intensive use of plastic in agriculture – such as plastic films used as crop mulches – pollutes the soil, and significantly reduces the number of key microbes that contribute to nitrogen cycling and organic matter decomposition. As a result, some of the world's most productive agricultural soils are now being affected by plastic pollution, seriously threatening soil health and food security.

In addition, food packaging and fishing nets are some of the main contributors to plastic waste pollution in the EU.

Therefore, it is essential that the Farm to Fork Strategy align with the Circular Economy Action Plan, and that measures are implemented to reduce the reliance on single-plastics in the agricultural, fishing and food sectors.

Conclusions

ClientEarth calls the Commission to ensure that:

- A proper public consultation process is conducted prior to the adoption of the Farm to Fork Strategy;
- The Common Agricultural Policy and the Common Fisheries Policy are adequate to meet the level of ambition set in the EGD;
- In the seafood supply chain, businesses use their leverage to set and promote new rules to support sustainable seafood and consumers receive the information necessary to make responsible purchasing choices;
- The gaps in the existing legislation on air pollution from agriculture emissions are properly filled;
- A concrete action plan is adopted to urgently reduce the exposure of people and environment to toxic chemicals through food products and agricultural activities.
- The Biodiversity Strategy is complemented and not undermined.

- The Farm to Fork Strategy is aligned with the Circular Economy Action Plan and measures are implemented to reduce the reliance on single-plastics in the agricultural, fishing and food sectors.

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