



ARCHE NOAH

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## ARCHE NOAH comments on the Roadmap for the “Farm to Fork Strategy”

We welcome the approach to develop a coherent farm to fork strategy. Especially in the context of the current biodiversity and climate crises, but also in light of the need to produce healthier food for healthier diets, we need immediate ambitious policy changes. The strategy must deliver a strong vision for a fundamental transformation of the European food system, including legally binding goals, concrete measures and sufficient budget. This concerns most importantly the Common Agriculture Policy. But research and innovation, health, and trade policies also have to shift towards fundamentally sustainable models. The overall strategy should lead to ambitious goals in relevant policy processes, such as the European Biodiversity strategy. This strategy presents a unique opportunity for a shift towards an ecological, socially just and more democratic system. It should also support farmers in the necessary transition towards the new, sustainable and knowledge-intensive model.

The roadmap strongly emphasizes the climate crisis, which undoubtedly is one of the largest threats to our ecosystem and for future generations. However, at the same time, the biodiversity crisis has major ramifications for European society and therefore has to be a focal point of the strategy. Moreover, the climate and biodiversity crises are linked: biodiversity loss contributes to the climate crisis, but strong action on biodiversity can also mitigate the climate crisis.

### Seed diversity at the core of the new food system

Agrobiodiversity and seeds have to be the core of the of such a strategy:

- The explicit goal to stop genetic impoverishment in European agriculture. Moreover, ambitious and measurable biodiversity and climate goals, as well as and pesticide and fertilizer reduction targets. This includes stopping all measures which run contrary to those goals.
- Diverse, organic and locally adapted seeds and plant propagating material have the potential to contribute significantly to halting the dramatic biodiversity loss which threatens food systems<sup>1</sup> by providing habitats for many species. Importantly, stopping biodiversity loss is not only about stopping harmful interferences in nature, it is also about building on the many decades of positive human-nature interaction which led to crop diversity and a multitude of varieties. These

<sup>1</sup> IPBES. "Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services.", 2019, 3.



contributions have been eroded by industrialized agriculture, but an ambitious clear investment in diverse genetic resources in agriculture can reverse this process.

- Locally adapted seeds and organic heterogeneous material are less dependent on external inputs, more resilient in the face of climate changes, and not dependent on mineral fertilizer and synthetic pesticides. We do not know what pests, diseases, climatic changes and other challenges agriculture will face; it is therefore imperative to conserve and develop the full breadth of genetic diversity of agricultural plants to ensure we have the tools to ensure our future food security. Diversity in fields and gardens also contribute to achieve climate goals as well as reduction goals for fertilizers and pesticides. They are the base of a diversified agriculture, which increases biodiversity and provide living environments for animals providing crucial ecosystem services, such as pollinators. The Intergovernmental Panel on Climate Change (IPCC) explicitly acknowledges the role of seed archives and seed networks in adapting to climate change and minimizing the risk to food security<sup>2</sup>.
- Crop diversity forms the basis of a healthy, sustainable and primarily plant-based diet, and can facilitate the development of regional supply chains and direct marketing, thus contributing to climate, health and regional development goals.

**High crop biodiversity is our insurance for the challenges of tomorrow. Diverse production systems are an absolute necessity for resilient agricultural and food systems.<sup>3</sup>**

### Proposed goals and measures

- The explicit goal to stop genetic impoverishment in European agriculture. Moreover, ambitious and measurable biodiversity and climate goals, as well as pesticide and fertilizer reduction targets. This includes stopping all measures which run contrary to those goals.
- A radically transformed CAP with clear biodiversity and climate goals at its core, while supporting farmers' incomes in the transition and for the additional service such a farming model provides to societies. The biodiversity goals and the CAP should include an agrobiodiversity indicator. This indicator should be measured on individual farms and include (1) crop-species richness (2) crop-cultivar diversity (3) type of crop accessions (4) livestock-species diversity (up to 5 livestock species), and (5) breed diversity as suggested by Last et al.<sup>4</sup>
- A significant research and innovation focus on organic breeding activities and other sustainable uses of genetic resources, including participatory (pre-)breeding activities. Together with stronger investment in the conservation of genetic resources - both in-situ (on farms) and ex-situ (e.g. in

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<sup>2</sup> IPCC, "Land Degradation: IPCC Special Report on Climate Change, Desertification, Land Degradation, Sustainable Land Management, Food Security, and Greenhouse gas fluxes in Terrestrial Ecosystems.", 2019, Chapter 5, 467-8.

<sup>3</sup> FAO. "The state of the world's biodiversity for food and agriculture." Rome: FAO Commission on Genetic Resources for Food and Agricultural Assessments, 2019, 27.

<sup>4</sup> Last, L. et al. Indicators for the on-farm assessment of crop cultivar and livestock breed diversity. *Biodivers Conserv* 23, 2014, 3051-3071.

seed archives, community seed banks and botanical gardens) – to secure the base for meeting future challenges in the food system.

- The (potential) reform of European seed marketing laws has to contribute significantly to more biodiversity, by liberating seeds from overregulation, making it easier to market locally adapted and historic seeds as well as innovative populations, and promoting free exchange of seeds. The policy framework urgently needs to make space for smaller actors to deliver locally adapted solutions on the currently very concentrated seed market.
- Patents on conventionally bred seeds threaten breeding activities and crop diversity – they finally have to be stopped.

Together with the concentration of the seed market, they hinder a transition of farmers to diverse production systems.

- A clear goal for increase the acreage of organically farmed land in Europe.
- Current food and biodiversity safety standards must not be weakened by the strategy or trade agreements, including the laws for genetically modified organisms.

### **Involved Stakeholders**

The current food system is marked by a strong concentration of power on few stakeholders, especially in the seed and pesticides industries, large retailers, and industry-dominated farming associations.

Innovative projects, alternative food supply chains, which successfully champion solutions the massive ecological crises the failing system generates, are often delivered by stakeholders which work on regional or local level. The stakeholder consultation has thus to go beyond the Civil Society Dialogue and has to accept regional and national stakeholders which currently do not have their interests represented on European level but are crucial for the new food system. Thus the targeted stakeholder consultation has to be open to those stakeholders.

### **About ARCHE NOAH Noah ("Noah's Ark"):**

ARCHE NOAH an Austria--based non-profit Seed Savers' association founded in 1990. Our **mission** is to maintain and spread agricultural plant diversity. Our **activities** include conserving and disseminating about 5,500 endangered cultivated plants. These activities are financed through donations and through our 17,000 members and supporters. These include ordinary citizens, gardeners and farmers from numerous European countries. Furthermore, Arche Noah actively advocates for European policies that stand up for biodiversity, celebrate and safeguard consumer choice in nutritious and tasty food of high quality, while also championing small scale farming.