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ARCHE NOAH



Brussels, 29 May 2018

Dear Commissioner Hogan,

We are writing to you regarding the proposed EU Protein Plan, which is due to be published later this year, and would like to ask for a meeting to discuss its content and focus.

We very much welcome that the EU is proposing a protein plan. The impacts of the EU's demand for imported soy protein have for too long led to widespread damage to the environment, sustainable farming and rural livelihoods, especially in the global South.

With this in mind, we request that the EU Protein Plan addresses the following issues and recommendations:

**The link between industrial animal production and plant protein demand**

Demand for plant protein crops has increased substantially in recent decades due to increased EU production and consumption of animal products, in particular poultry (including eggs) and pig meat, as both animals are more intensively farmed and almost wholly reliant on feed composed of cereal and soybeans. Reducing EU production and consumption of animal products will sizeably reduce demand for protein crops to more sustainable and equitable levels.

**Land destruction and degradation in third countries**

The EU's intensive animal agriculture model, which is designed to meet high production and consumption volumes, drives the conversion of forests and other ecosystems outside the EU. It is therefore critical that the European Commission adopts an Action Plan to halt deforestation and forest degradation, including legislation ensuring that agricultural commodities, including protein crops, linked to the EU market are free from deforestation and fully respect human rights.

### **Promotion of pulses for human nutrition and their environmental benefits**

Pulses are a rich source of minerals such as iron, zinc and folate, are low in fat, and high in both protein and fibre. They also help contribute to climate mitigation and adaptation: they require little water or fertiliser, add valuable nitrogen to the soil and, when grown with other crops, can increase soil fertility and yield. Producing more leguminous crops, especially when part of a solid crop rotation, is also a tool that can assist European farmers in cutting their pesticide dependency. Furthermore, many of their varieties are rich food sources for pollinators.

In order to make the food system more resilient and resource-efficient, it is imperative to ensure a sustainable supply of EU protein crops for human consumption. The market for plant-based meat and dairy alternatives is growing rapidly, with plant-based meat alone predicted to reach a global net worth of €4.2bn by 2020, and Europe is currently the largest market for meat substitutes with a 39% global market share. Promoting grain legumes should therefore be a focal point of the strategy.

### **Investing in research into diverse protein crop development**

There is an urgent need for investment into the research and development of high quality, diverse, nutritious, and often neglected, seed crops and grain legumes (pulses) for human consumption that will benefit human health, the environment and support biodiversity.

### **Policy recommendations:**

- Inclusion of a strategy that sets out concrete measures to reduce production and consumption of animal products, in order to mitigate the detrimental effects of industrial animal farming and to raise plant protein crop demand for human consumption;
- Incentivise the production of diverse and underused protein crops for human food, over intensive animal production (including feed);
- Adoption of an EU Action Plan on deforestation and forest degradation, including legislation to ensure the imports of agricultural commodities, such as protein crops, do not cause deforestation and fully respect human rights;
- Promote the production of protein crops that contribute in parallel to the production of other goods like beekeeping production or the provision of provisions for wild pollinators;
- Conduct a full assessment with a results indicator on how the objectives of the Protein Plan can be addressed within the CAP, including:
  - Ensuring that the purpose of setting aside 'ecological focus areas' is not defeated by re-opening them to herbicide use in the name of soy production;
  - Providing a grant fund under Pillar II to assist farmers in transitioning away from intensive animal farming to the production of protein crops for human food;
  - Increasing financial and advisory support for crop rotation and diversification practices that involve plant protein cultivation;
  - Removing support for monocultures, intensive animal farming and other practices that effectively lead to landholding concentration; likewise, these practices should not be supported outside the EU;
  - Supporting diverse agroecological farming, creating short supply chains from farm to fork at fair prices for farmers and citizens;
  - Ensuring protein and leguminous seed availability at fair prices, this being an opportunity to induce the ecological breeding of pulses and legumes for human consumption and their marketing in the value chain;
  - Providing a grant fund under Pillar II to support improved, decentralised facilities for the seed selection and development, processing, storage and marketing of local and regional legumes crop varieties.

As civil society organisations representing the interests of EU citizens, we hope that you will grant us a meeting to discuss the issues raised above.

We look forward to hearing back from you and remain at your disposal to answer any questions.

Yours sincerely,

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