

TRADING AWAY THE FUTURE?

How the EU's agri-trade policy is at odds with sustainability goals



**>FEED
BACK EU**



Feedback EU is a non-governmental food justice organisation based in The Hague, Netherlands with representation in Brussels. Together with our sister organisation Feedback Global and our partners from the national/European level as well as from the Global South, we strive for a food system that is not only in balance with nature but also fair to those who produce and consume food. For this purpose, we do research, conduct advocacy campaigns, challenge power structures, catalyse action and empower people to achieve positive change.

CONTENTS

EXECUTIVE SUMMARY	3
-------------------	---

INTRODUCTION	5
--------------	---

FIVE KEY AREAS WHERE AGRI-TRADE POLICY IS UNDERMINING FOOD SUSTAINABILITY GOALS	9
---	---

1. The climate crisis	9
-----------------------	---

2. Public health	14
------------------	----

3. Food security and EU farmers' livelihoods	18
--	----

4. Global equity	22
------------------	----

5. Animal welfare	24
-------------------	----

RECOMMENDATIONS	26
-----------------	----

CONCLUSION	31
------------	----

REFERENCES	32
------------	----

EXECUTIVE SUMMARY

We live in a time of polycrisis deeply intertwined with how we produce and consume food. As one of the largest global markets and one of the world's most outward-oriented economies, the European Union (EU) plays a pivotal role in influencing global food trade through its consumption and production patterns. In 2021, a review of the EU's trade policy by the European Commission asserted that it "should use all the tools at its disposal to support social fairness and environmental sustainability"¹. The 2024 Strategic Dialogue on the Future of EU Agriculture has also highlighted the need to align agri-trade policy with sustainability.

However, current EU agri-trade policies do not reflect the urgent imperative of transforming our food system. This report presents case studies of three internationally traded protein commodities (soy, rapeseed, and beef) to demonstrate how EU agri-trade policies are at odds with EU policy objectives in five key areas:

1. **The climate crisis:** by supporting a livestock sector that contributes to deforestation, biodiversity loss, and greenhouse gas (GHG) emissions.
2. **Public health:** by enabling meat- and dairy-heavy diets that harm human health while importing residues of dangerous pesticides, antibiotics, and genetically modified organisms (GMOs).

3. **Food security and EU farmers' livelihoods:** by hampering the ability of EU farmers to get a fair price for their food while reducing the amount of food available for human, rather than animal, consumption.
4. **Global equity:** by maintaining unfair and neocolonial double standards concerning the use of pesticides in third countries and perpetuating land-grabbing from local and Indigenous communities.
5. **Animal welfare:** by accepting the meat import of animals subject to less stringent animal welfare and veterinary standards than the EU would require.

As the EU prepares to mark the fifth anniversary of its landmark Farm to Fork strategy and enters a new legislative period from 2024-2029, the time to act on putting the EU's trade policy at the service of sustainability is now. A business-as-usual approach will make it impossible for the EU to achieve its sustainability goals².

Against this backdrop, this briefing reaffirms the need for a realignment of EU agri-trade policy to enable the urgent transformation of our food system in line with key climate, public health, global equity, food security, and livelihood objectives. It recommends that EU policymakers:

1. PUT EU AGRI-TRADE POLICY AT THE SERVICE OF SUSTAINABLE FOOD SYSTEM TRANSFORMATION

1.1 Champion new possibilities for integrating sustainability and trade

The EU should act as a global leader in integrating sustainability and trade objectives, working through existing WTO mechanisms and supporting the development and implementation of new tools such as the "Codex Planetarius" created by the World Wildlife Foundation (WWF).

1.2 Conduct sustainability assessments of new and existing trade agreements

The EU should assess all new and existing trade agreements against commitments under the Sustainable Development Goals (SDGs), the Paris Climate Agreement, the European Green Deal, and other European strategies.

1.3 Strengthen mirror measures related to health and sustainability

While acting to integrate trade and sustainability more holistically, the EU should strengthen existing mirror measures — provisions that stipulate the same production standards in traded goods as would be required within the EU — to mitigate the health and environmental impacts of producing agricultural goods for the EU market in third countries^a.

a Technical proposals on mirror measures in European agri-trade are the subject of a new report by Feedback EU and partners, 'Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System' (2024).

1.4 Close gaps in current import regulations and improve enforcement capacities

The EU should act urgently to close gaps in trade regulations that allow for the import of commodities harmful to human health, the environment, and the climate, including by bolstering customs and veterinary authorities and revising the scope of the delayed Regulation on Deforestation-free Products (EUDR) to protect sensitive biomes in Latin America (which as of now are not covered).

1.5 End double standards and inconsistencies on the use and export of banned substances

The toxic double standard of European companies exporting harmful pesticides banned in the EU to third countries must end, as should import tolerances for agrichemicals whose long-term impacts on human health, particularly when combined (so-called 'cocktail effects'), are unknown.

1.6 Rectify market distortions of and import dependency on key proteins

The EU should seek to reduce imports of cheap livestock feed from third countries — which undercuts EU farmers growing plant-based proteins — within the framework of new trade-sustainability requirements and an EU-wide protein plan (see Recommendation 2.1).

2. IMPROVE EU PROTEIN AUTONOMY

2.1 Create a comprehensive EU protein plan to guide the shift towards protein autonomy

A key focus of the new 2024-2029 EU legislative period should be to create a comprehensive and binding European protein plan to promote the growth of plant-based proteins for human consumption while improving the sustainability of the livestock sector and the position of EU farmers.

2.2 Ensure the CAP incentivizes plant protein production for human consumption

The Common Agricultural Policy (CAP) should invoke environmental provisions (including the Good Agriculture and Environment Conditions, or GAEC, that were recently rolled back under political pressure³) to incentivize the production of plant proteins for human consumption, while prioritising a shift towards more climate- and environment-friendly agricultural practices.

INTRODUCTION

The global food system is deeply intertwined with trade policies that shape the way agricultural products are produced, exchanged, and consumed across borders (referred to in this report as agri-trade policies)⁴. About one-quarter of food produced for human consumption worldwide is internationally traded^{5,6}. While trade can increase the supply and diversity of certain foods available to consumers, it can also create environmental and public health risks⁶ and disrupt traditional livelihoods; in addition, the rapid liberalisation of global trade in recent decades is seen by many as fuelling global inequality^{7,8}.

The European Union (EU) plays a pivotal role in influencing global trade in food and agricultural products through its consumption and production patterns. The EU is the largest single market area and one of the most outward-oriented economies in the world. From 1999 to 2010, EU foreign trade doubled and now accounts for over 30% of the EU's gross domestic product (GDP)⁹. The EU has exclusive power to legislate on trade matters and to conclude international trade agreements, based on World Trade Organisation rules, on behalf of its 27 Member States⁹. At the end of 2023, the EU had 42 preferential trade agreements with 74 preferential partners, corresponding to 45.8% of total EU external trade¹⁰. The EU imported €158.8 billion worth of agri-food products in 2023¹¹ — equivalent to just under half of the extra funding the block is trying to mobilise annually by 2030 to meet its emissions-related targets in the Green Deal¹².

In 2021, a review of the EU's trade policy by the European Commission asserted that it "should use all the tools at its disposal to support social fairness and environmental sustainability"¹. Yet, the EU's agri-trade policy continues to enable many agricultural practices that are detrimental to its objectives as laid out under the Green Deal of reaching "no net emissions of greenhouse gases by 2050" and "no person and no place left behind"¹³.

This report draws on case studies on three key commodities imported into the EU — beef, soy, and rapeseed — with a focus largely on imports. It uses these commodities to demonstrate how agri-trade is undermining sustainable food systems goals in five key areas: the climate crisis, public health, EU farmers' welfare and food security, global equity, and animal welfare. It makes recommendations for how the EU can use the powerful trade and agricultural policy tools at its disposal to affirm the goals of the Green Deal and Farm to Fork (F2F) strategy, in turn positioning itself as a global leader in food sustainability.

WHY TALK ABOUT AGRI-TRADE POLICY NOW?

Recent events in Europe highlight how progress on food systems change can easily be slowed or halted. While gains in terms of making trade policy more sustainable have been made over the last few years with EU regulations on forced labour¹⁴ and deforestation (EUDR) in supply chains¹⁵, the European Commission has dropped the introduction of the Legislative Framework For Sustainable Food Systems (FSFS) promised by the F2F Strategy. It also rolled back key ecological reforms to the Common Agricultural Policy (CAP) until 2027 under pressure from EU farming lobbies¹⁶, and postponed the implementation of the deforestation regulation by one year under pressure from global corporations and governments¹⁷.

The CAP reform rollback, in particular, was linked to the issue of trade. European farmers protested market distortions caused by more stringent production requirements in Europe than in exporting countries, arguing that these discrepancies impact their competitiveness in a challenging environment already characterised by rising uncertainty related to climate change and the loss of smaller farms around Europe^{3,18,19}. Farmers' frustrations with the current situation are valid. However, the precarity they face is not the result of environmental protection measures, but rather, policies that enforce unfair double standards on European farmers versus their external counterparts and support the continuation of agricultural practices driving global heating²⁰. More equitable and considered agri-trade policies can play a key role in shifting towards more sustainable food systems for the benefit of both people and the planet. These considerations are particularly critical in light of the EU-Mercosur Trade Deal, which, if ratified, would have significant environmental and social repercussions²¹⁻²³.

The need to harmonise trade and sustainability policies is already on the EU's agenda. The Strategic Dialogue on the Future of EU Agriculture, which was delivered following a consensus of 29 major stakeholders from the European agricultural sector and civil society to the EU Institutions in September 2024, concluded that integrating sustainability goals into trade policy will be a key mechanism for shifting the EU towards more sustainable food systems as well as improving the livelihoods of European farmers²⁴. The 2024-2029 EU legislative period represents a critical period for shaping the future of EU food and agricultural policies by acting on these recommendations. Donald Trump's victory in the US presidential election means that one of Europe's largest trading partners may launch a "trade war" with

the bloc, making it a crucial time to rethink European agri-trade policy in the name of both food security and sustainability¹⁵⁶. As the fifth anniversary of the Green Deal and the associated Farm to Fork strategy to promote sustainable food systems approaches, the time to act is now.

ANALYSING AGRI-TRADE POLICY THROUGH THREE KEY COMMODITIES: BEEF, SOY, AND RAPESEED

To examine agri-trade policy and sustainability, this report draws on data from three key protein commodities (see Table 1) with substantial import flows into the EU: beef, soy, and rapeseed. These commodities were selected for three reasons:

- As proteins, they play a key role in both the EU's protein autonomy (defined here as reaching a state of self-sufficiency in key proteins), as well as the transition towards plant proteins as part of a healthy and climate-friendly diet.
- As products produced both in and outside of the EU, they highlight important discrepancies related to production standards.

- Their production and import have notable implications for farmers, workers, communities, and animals both in and outside of the EU.

The interlinkages of these commodities and EU trade policy are made clear in the European Parliament's Report on the draft European Protein Strategy, where rapporteur Emma Weisner (Renew Europe, Sweden) states that the European Parliament²⁵:

...highlights production outside the EU and importing beef or protein crops such as soya beans is sometimes associated with deforestation, unsustainable land use change and negative environmental impacts such as soil erosion and contamination of groundwater, as non-EU producers may be held to lower sustainability, regulatory and ethical standards than producers in the EU; considers that imported products should meet comparable sustainability standards in order to provide greater competitiveness for EU producers and prevent the relocation of EU production abroad.

Beef and soy are two commodities whose trade flows are set to increase if the EU-Mercosur trade agreement were to be implemented (see Box 2). While the EU currently imports just a small share of its beef supply, the agreement provides for the concession of an additional quota of 99,000 hundredweight (cwt) of beef at a reduced customs duty (7.5%) to the EU²⁶.

BOX 1: EU SUSTAINABLE FOOD POLICY EXPLAINED

The EU has various policies, laws, and dialogues related to sustainable food. Below are some of the most relevant:

Agri-food sustainability policies

- **European Green Deal:** a set of proposals and already-adopted laws to make the EU's climate, energy, transport and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels.
- **Farm to Fork (F2F) Strategy:** a flagship strategy of the Green Deal which aims to make food systems fair, healthy and environmentally friendly.
- **Legislative framework for sustainable food systems (FSFS):** a key implementation mechanism of the F2F Strategy. The legislative proposal was expected to be tabled in autumn 2023 but has so far failed to materialise, and it is unclear when or if the framework will be introduced.

BOX 1: EU SUSTAINABLE FOOD POLICY EXPLAINED

Agricultural policies

- **Common agriculture policy (CAP):** a policy package launched in 1962 that regulates and funds the EU's agricultural sector. It is worth €386.6 billion over seven years, accounting for roughly one-third of the EU's budget²⁷. In the spring of 2024, key environmental reforms to the CAP were rolled back due to the EU Commission giving in to demands made by certain EU farm lobbies.

Directives and regulations

- **Regulation (EU) 2023/1115 on deforestation-free products (EUDR):** a regulation related to the Green Deal and the F2F strategy which aims to tackle deforestation in imported products. The Commission has proposed to delay implementation from December 2024 to December 2025.
- **Directive on corporate sustainability due diligence (Directive 2024/1760):** a directive that came into force in July 2024 requiring certain companies to identify and address environmental and human rights impacts in their supply chains.

Dialogues and proposals

- **Strategic Dialogue on the Future of EU Agriculture 2024:** a consultation between 29 diverse stakeholders of the EU's agri-food chain launched in January 2024 and published in September 2024. Recommendations will guide the European Commission as it shapes its Vision for Agriculture and Food, to be delivered in the first 100 days of President von der Leyen's second mandate.
- **EU Draft Protein Strategy:** a draft strategy tabled and approved by the European Parliament on the need for the EU to become more self-sufficient in plant-based proteins, which the Commission has not yet turned into a formal plan.

BOX 2: EU TRADE POLICY AND SUSTAINABILITY OBLIGATIONS: THE CASE OF THE EU-MERCOSUR AGREEMENT

Trade agreements can limit the EU's ability to act on sustainability goals. The elimination of tariffs on products encourages markets to expand, while exceptions (derogations) made for product standards from trading partners can damage the environment and public health.

One example of this is the yet-to-be-ratified EU-Mercosur trade agreement (concluded with the four founding members of Mercosur: Argentina, Brazil, Paraguay, and Uruguay). Legal analysis commissioned by Greenpeace Germany found that the agreement could violate EU climate laws²². While the EU has established rules around Trade and Sustainable Development (TSD) requiring the effective implementation of the Paris Agreement on Climate Change in its trade agreements, the EU-Mercosur agreement fails to account for the deforestation and negative impact on biodiversity created by a massive increase in trade. It also does not account for obligations under the EU Charter of Fundamental Rights and EU laws on emission reduction targets. This opens up the potential for the deal to be challenged in the European Court of Justice by an EU government or the European Parliament²².

Table 1: Three key protein imports in the EU

	Beef	Soy	Rapeseed (also known as canola) ^b
Share of total consumption imported per year (EU total)	4%*	Soybeans: 86% beans Soymeal: 64%**	27%
Top 3 EU trade partners	UK, Brazil, Argentina	Soybeans: Brazil, US, Ukraine Soymeal: Brazil, Argentina, USA	Australia, Ukraine, Uruguay
Top 3 EU importing countries	The Netherlands, Spain, Germany	Soybeans: The Netherlands, Spain, Germany Soymeal: Poland, the Netherlands, Spain	France, Romania, Belgium
Main consumption channel	Human consumption	Animal feed	Animal feed
Key issues	• High GHG emissions • Risk of use of growth hormones/ antibiotics banned in the EU; issues with traceability and animal welfare • Imported deforestation and land-grabbing	• Imported deforestation and land-grabbing • Risk of use of pesticides/ herbicides and practices banned in the EU • Impact of pesticides on local and/or Indigenous communities in third countries • Reliance on imported products jeopardises EU protein autonomy	• Risk of use of pesticides/ herbicides and practices banned in the EU • Reliance on imported products jeopardises EU protein autonomy

*Source: EU Beef and Veal Balance Sheet (thousand tonnes of carcass weight equivalent). Data from 2022. https://agridata.ec.europa.eu/extensions/DashboardSTO/STO_Meat.html

Other figures sourced from Eurostat 2022 and EU feed protein balance sheets 2022 / ** Out of the 36% of soymeal produced in the EU, 92% is made of imported soybeans — meaning that 93% of the total soy (bean and meal) consumed in the EU is imported.

BOX 3: THE NETHERLANDS AS A KEY PLAYER IN GLOBAL TRADE

The flows of imported and exported goods can be complex. For example, the Netherlands, while serving as the EU's top importer of soy (see Table 1), is also the world's second-largest trader and processor of soy, exporting 89%. A handful of multinational and Dutch companies dominate Dutch soy processing: ForFarmers, Royal de Heus, and Agrifirm make up more than half of the Dutch market²⁸. Most soy (68%) is crushed at one of the two crushing plants owned by the two largest soy traders in the world, Archer Daniels Midland (ADM) in Rotterdam and Cargill in Amsterdam²⁹.

The majority of the soy used domestically (93%) in the Netherlands is destined for animal feed, particularly for dairy cattle, pigs, and chickens, which in turn are mostly exported³⁰. In total, the Dutch animal feed industry produced around 14.9 million tonnes of compound feed in 2018³¹.

After Italy and Germany, the Netherlands is also the third-largest exporter of pesticides banned in the EU to third countries where they are permitted^{32,33} (see 'Global equity: Imported commodities and exported pesticides create unfair and dangerous conditions for workers and communities in third countries').

^b Food-grade rapeseed is often referred to as "canola" in North America.

FIVE KEY AREAS WHERE AGRI-TRADE POLICY IS UNDERMINING FOOD SUSTAINABILITY GOALS

This report now addresses five key areas where agri-trade policy related to soy, beef, and rapeseed undermines the EU's food sustainability goals. These goals relate to the climate crisis, public health, food security and EU farmers' livelihoods, global equity, and animal welfare. Each of these areas is addressed in turn.

1. THE CLIMATE CRISIS

RELEVANT EU GOALS:

*Paris Climate Agreement*³⁴

- Substantially reduce global greenhouse gas emissions to hold global temperature increase to well below 2°C above pre-industrial levels and pursue efforts to limit it to 1.5°C above pre-industrial levels, recognising that this would significantly reduce the risks and impacts of climate change

*Kumming Montreal Global Biodiversity Framework*¹⁵⁷

- Protect 30% of Earth's lands, oceans, coastal areas, inland waters

*Sustainable Development Goals*³⁵

- Goal 12: Ensure sustainable consumption and production patterns
- Goal 13: Take urgent action to combat climate change and its impacts
- Goal 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

*European Green Deal*¹³

- "No net emissions of greenhouse gases by 2050"

*Farm to Fork Strategy*³⁶

- Have a neutral or positive environmental impact
- Help to mitigate climate change and adapt to its impacts
- Reverse the loss of biodiversity

*EUDR*³⁷

- Protect and improve the health of existing forests, especially primary forests, while significantly increasing sustainable, biodiverse forest coverage worldwide.

The global food system is a key driver of the climate crisis. It is responsible for one-third of greenhouse gas (GHG emissions) globally²⁰ and drives biodiversity loss and deforestation. Today, one-third of globally produced calories are used to feed livestock³⁸ and producing this feed requires three-quarters of agricultural land under cultivation³⁹. Livestock production accounts for approximately 14.5% of global anthropogenic GHG emissions, with cattle (beef and milk) responsible for about two-thirds of that total⁴⁰. In the EU, emissions from the livestock sector are responsible for 81-86% of the block's total agricultural GHG emissions⁴¹. Agri-trade policy is one mechanism that enables industrial agriculture to be economically viable: about one-third of agri-food exports in the world are traded within supply chains encompassing at least three countries⁴.

The EU's current agri-trade policy is at odds with climate goals. The section below highlights three major discrepancies, evidenced by our three protein case studies.^c

THE LIVESTOCK SECTOR AND MEAT-HEAVY DIETS CONTRIBUTE TO GLOBAL HEATING —ENABLED BY SOY IMPORTS

There is a broad consensus that Europeans consume diets too heavy in meat and dairy to allow our food system to remain within planetary limits.⁴² The EAT-Lancet Commission recommends that people eat no more than 300 grammes of meat per week by 2050 as part of a balanced, sustainable diet; yet Europeans consume closer to 1.3-1.2 kg of meat per week⁴³.^d The amount of dairy consumed in the EU is nearly three times the global average⁴⁴. One study found that cutting the amount of meat, dairy, and eggs consumed in the EU in half would achieve a 40% reduction in nitrogen emissions, 25-40% reduction in greenhouse gas emissions and 23% per capita less use of cropland for food production⁴⁵.

^c These issues are exemplary of key challenges but are not intended to be exhaustive.

^d Calculated using the range of weekly meat consumption given by the 2021 EU Commission projection of Europeans going from consuming 69.8 kg in 2018 to 67 kg per capita per year by 2031.

The EU's current meat and dairy-heavy diet is enabled by an abundant supply of imported animal feed, as its livestock sector relies on imported soy as a feed source. In 2022, the EU imported nearly 30 million tonnes of soy, amounting to 93% of total consumption⁴⁶. Nearly all of this is used to produce the 150 million tonnes of feed required to sustain the EU livestock sector⁴⁷, making it "a key enabler of mass-produced meat and dairy products"⁴⁸. As very little soy is cultivated in the EU, imported soy is currently more cost-effective for European farmers to use as feed⁴⁹. The European Commission's study on strategies to diversify protein sources in the EU noted that the price competitiveness of EU protein sources versus imported protein sources is a key factor in the business decisions of most operators⁴⁹ — highlighting how these soy imports maintain a livestock sector that needs to be drastically reduced to meet climate goals.

While the EU's production of beef, pig, sheep, and goat meat is set to decline modestly by 2035 — for example, beef production in 2035 is set to shrink by 9.2% compared to the 2021-2023 average¹⁹ — this is nowhere near the scale and speed of change needed to meet climate goals (and also does not account for imports). The recent Strategic Dialogue on the Future of EU Agriculture did not reach an agreement on the need to reduce the size of the EU's livestock herd, although it did acknowledge the need for Europeans, who consume 80% more meat than the global average⁵⁰, to shift towards more plant-based diets. A 2024 study at Harvard of over 200 climate scientists and sustainable food/ agriculture experts based in 48 countries found nearly all respondents (92%) agree that reducing emissions from the livestock sector is important to limiting temperatures to a maximum of 2°C above pre-industrial levels, and that livestock emissions should be reduced as much as possible to reduce the risk of temperatures exceeding 1.5°C (87%) or 2°C (85%)⁵¹. An important way of limiting these emissions will be to reduce the size of the EU's livestock herd, coupled with other policies to promote plant-based diets and the growth of plant-based proteins². In modelling done by the Institute for European Environmental Policy, all pathways to reaching net-zero emissions in the EU agricultural sector by 2050 required a 75% reduction of EU meat consumption by 2050 compared to 2010⁵².

These challenges relate directly to EU agri-trade policy. Reducing imports of soy and other feedstocks will be crucial for shrinking the size, and therefore the footprint, of the EU's livestock sector and consumers' meat-heavy diets. Reducing the size of the EU's livestock sector is particularly important given the current perverse incentives offered by the EU to expand livestock production as a means of producing biomethane from manure (this issue is covered in-depth in Feedback EU's October 2024 report, 'Biomethane From Manure: A Curse, Not A Cure'²).

BEEF AND LIVESTOCK FEED IMPORTED INTO THE EU CONTRIBUTE TO DEFORESTATION

Globally, the land-use footprint of soy production is estimated at 131 million hectares — about one-third of the size of the EU⁵³. Soy is notorious for its role in global deforestation and biodiversity loss^{53,54}. Between 2000 to 2016, soybean expansion drove 9% of forest loss in South America⁵⁴.

The EU's heavy dependence on imported soy means that its agri-trade policies have contributed to deforestation in major exporters such as Brazil and Argentina. Brazil is home to as much as 20% of the world's remaining biodiversity⁵⁵, and deforestation impacts sensitive landscapes such as the Amazon and the Brazilian Cerrado^{25,48,56}. The EU has long been aware of this issue: the now-delayed EUDR mirror measure (see Box 4) aims to reduce imported deforestation, including in agri-food products. However, the regulation will only cover products from areas that meet the Food and Agriculture Organization's (FAO) definition of forest, which excludes critical biomes, including large portions of the Cerrado⁵⁷.

While the EU is far more self-sufficient in beef than soy, beef and leather consumed in the EU have also been implicated in deforestation⁵⁸. Additionally, a study by the Greens/EFA Group in the European Parliament found that "additional deforestation as a consequence of the EU-Mercosur Agreement and increased beef exports covers a wide range, from a minimum of 620,000 hectares up to 1.35 million hectares in the worst case scenario over five years"²¹.



Credit: PARALAXIS, Shutterstock

IMPORTED LIVESTOCK FEED RELIES ON AGROCHEMICALS THAT HARM BIODIVERSITY

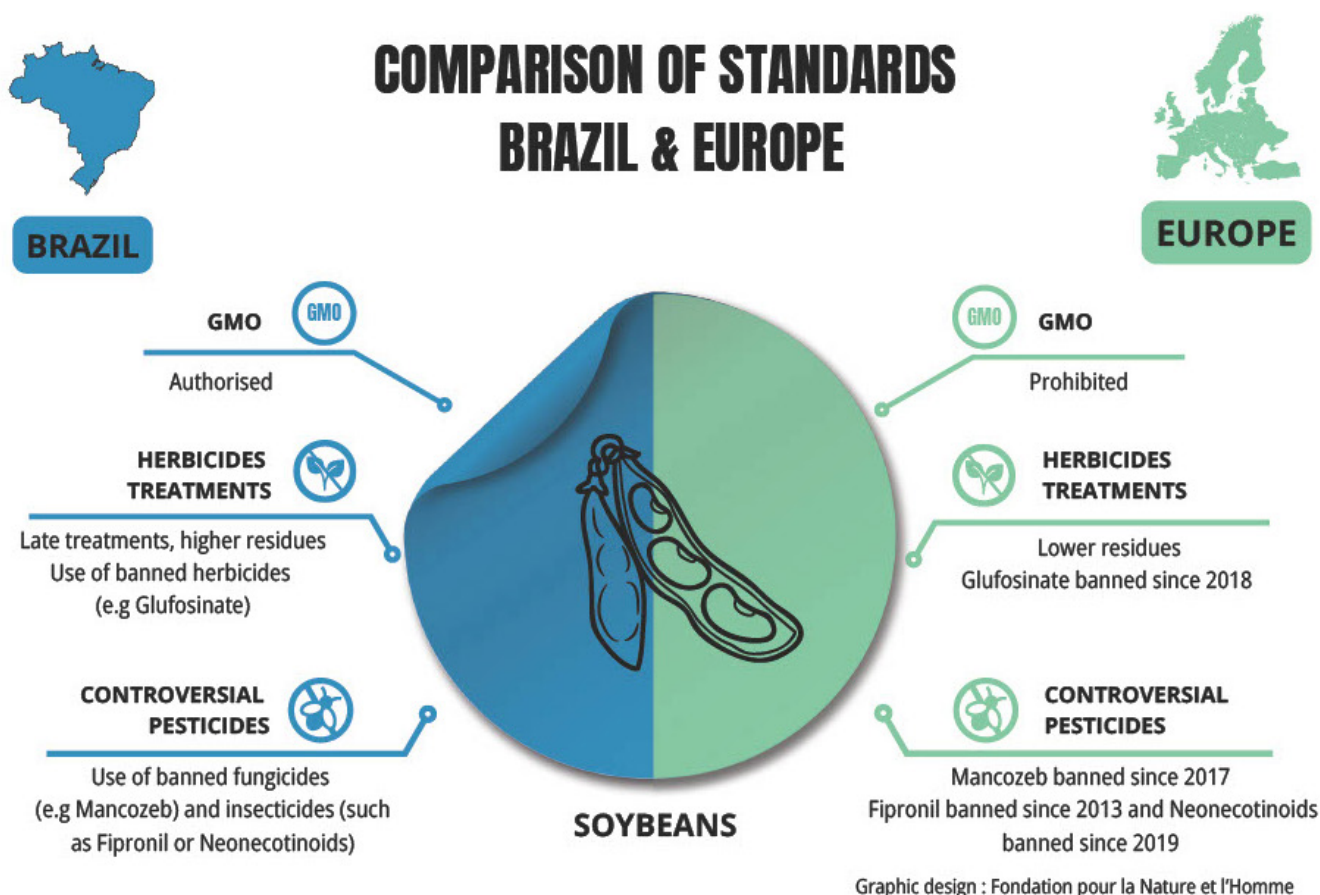
EU imports of soy and rapeseed contribute to biodiversity loss not only through land-use change but also with the use of dangerous agrochemicals. Pesticides and herbicides used on livestock feed in third countries are often toxic to “non-target” species²³. The EU strictly regulates pesticide use in agricultural production inside the block yet allows significant disparities between domestic and imported products. In accordance with EU pesticide regulations^e, products treated with pesticides banned in the EU can still enter the European market if residue levels comply with EU maximum residue limits (MRLs), which dictate the allowable trace amount of pesticides on imported products.

Soybeans are the most pesticide-intensive crop in Brazil, consuming just over half of all pesticides used in the country⁵⁹. Of the active substances approved for soy production in Brazil, more than half are prohibited in the European Union, mainly due to environmental and health concerns (see Figure 1)^f. Insecticides like bifenthrin and acephate, which are used to treat soybeans in Brazil, are harmful to important pollinators such as bees as well as fish and aquatic invertebrates in the case of bifenthrin and birds and mammals in the case of acephate⁶⁰. Fipronil, another highly toxic substance for bees, was banned in the EU in 2016 yet remains authorised in Brazil, including for aerial spraying of soybean crops in many states^{61,62}.

e Notably *Regulation (EC) No 1107/2009* of 21 October 2009 concerning the placing of plant protection products on the market and *Regulation (EC) No 396/2005* of 23 February 2005 on maximum residue levels of pesticides in or on food and feed of plant and animal origin.

f The calculation was made in March 2024 by cross-checking data from the Government of Brazil — Ministry of Health. n.d. 2024. <https://www.gov.br/anvisa/pt-br/assuntos/agrotoxicos> and the EU Pesticides Database — Active substances, safeners and synergists. 2024. <https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/start/screen/active-substances>.

Figure 1: Comparison of Soy Production Standards: Brazil and the EU



Source: *Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System. Feedback EU and partners. (2024).*

Similar issues can be seen with rapeseed. In Australia, the top exporting partner of rapeseed to the EU, a little more than twenty insecticide molecules have been authorised for aerial treatment on rapeseed⁶³. Only around half of these have been authorised in Europe, and some, like dimethoate and chlorpyrifos, are banned⁶⁴. Additionally, the use of neonicotinoid insecticides like clothianidin and thiamethoxam — highly toxic for bees and other wildlife⁶⁵ — as seed treatments is permitted in Australia, despite being banned in the EU in 2019.

The lack of more stringent regulation on deforestation caused by imported soy and beef, as well as the use of hazardous pesticides forbidden in the EU, means that the EU is importing deforestation and biodiversity loss — and outsourcing environmental and public health externalities in the process.

BOX 4: EUDR AND MORE — WHAT ARE MIRROR MEASURES AND CLAUSES?

The EUDR is an example of a mirror measure. Mirror measures are provisions integrated into EU trade policy that makes access to EU markets conditional on compliance with European production standards, regardless of product origin. Mirror measures aim to encourage reciprocity of production standards in trade and can mitigate distortions that reduce the competitiveness of European farmers.

Isolated examples of mirror measures have existed for a long time: in 1996, the EU banned imports from livestock farms using growth hormones. Since the launch of the Green Deal, the EU has adopted several mirror measures, including the EUDR, a regulation banning traces of two neonicotinoids (clothianidin and thiamethoxam) in imported products, and a forthcoming regulation to ban the use of forced labour in supply chains⁶⁶. While these measures represent a positive step towards protecting EU consumers, the environment, and global workers, much remains to be done to effectively apply them and rectify inconsistencies (the EUDR, for example, does not protect all sensitive biomes at risk of deforestation)⁵⁷. More broadly, there is an urgent need for more holistic and systematic action on the gaps in production standards between European and imported products.

The EU also enacts mirror clauses. Like mirror measures, these stipulate standards on the environment, health, or animal welfare; however, they pertain only to specific bilateral trade agreements, and condition access to import quotas or reduced customs duties for partner countries.

BOX 5: FURTHER READING ON SOY

Friends of the Earth Europe (2019). *Soy Alert: How to increase the EU's plant protein production in a sustainable and agroecological way?* (https://friendsoftheearth.eu/wp-content/uploads/2019/01/soyalert_report_fv_web.pdf)

The Landworkers' Alliance, Pasture for Life, Sustain, and Hodmedod (2023). *Soy No More: Breaking away from soy in UK pig and poultry farming.* (<https://www.sustainweb.org/reports/jun23-soy-no-more/>)

VOICES FROM EU FARMERS

“ In France, 90% of soybeans are imported to feed livestock, mainly from North and South America. It's cheaper, but its health and environmental impacts are enormous. Why accept this GMO soy, sourced from deforested areas and treated with pesticides banned in the EU? This is a major obstacle that prevents the development of European supply chains with more sustainable practices, which would strengthen our resilience and food sovereignty. ”

Christophe, soybean producer
(originally published in 'Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System' by Feedback EU and partners).

2. PUBLIC HEALTH

RELEVANT EU GOALS:

Sustainable Development Goals³⁵

- Goal 3: Ensure healthy lives and promote well-being for all at all ages

Farm to Fork Strategy³⁶

- Ensure food security, nutrition and public health, making sure that everyone has access to sufficient, safe, nutritious, sustainable food
- Promote sustainable food consumption and facilitate the shift to healthy, sustainable diets
- Reduce the overall use and risks of chemical pesticides and the use of more hazardous pesticides by 50 percent by 2030.⁶⁷

This section highlights two examples of how the EU's trade policy undermines public health in the bloc. One relates to the use of pesticides (see 'The Climate Crisis: Imported livestock feed relies on agrochemicals that

harm biodiversity') that are harmful to human health as well as insects and wildlife. The other looks at how an affordable supply of imported feed currently sustains the EU's livestock sector; having an abundance of meat produced in the block encourages EU citizens to consume meat and dairy-heavy diets that increase the risk of non-communicable diseases (NCDs).

BEEF AND LIVESTOCK FEED IMPORTED INTO THE EU CONTAIN AGROCHEMICALS THAT ARE DANGEROUS TO HUMAN HEALTH

Pesticides and herbicides

The EU maintains stringent regulations on pesticide residues in agricultural products, often going further than global standards set by the Codex Alimentarius, a collection of internationally adopted standards on food safety and hygiene⁹. However, pesticides banned or not approved in the EU can return to European consumers through imported products. A human



Credit: Grindstone Media Group / Shutterstock

⁹ The Codex Alimentarius, created by the Codex Alimentarius Commission, was established in 1963 by FAO and WHO. It presents food standards and related texts aimed at protecting consumers' health and ensuring fair practices in the food trade. The Codex Alimentarius includes standards for foods (processed, semi-processed or raw) for human consumption with respect to food hygiene, food additives, residues of pesticides and veterinary drugs, contaminants, labelling and presentation, methods of analysis and sampling, and import and export inspection and certification. Codex standards are voluntary and need to be transposed into national legislation to be enforceable. They also act as a reference in WTO trade disputes.

biomonitoring survey conducted between 2014 and 2021 found that 84% of samples from the bodies of children and adults across five European countries contained residues of two or more pesticides⁶⁸. Exposure to pesticides has been associated with increased risk of disease, including various types of cancers, neurological disorders and developmental delays, adverse impacts on fertility and reproduction, behavioural problems, and chronic respiratory diseases⁶⁸⁻⁷⁰. The 2024 Eurobarometer survey by the European Food Safety Authority (EFSA) found that 84% of respondents were concerned about hazardous chemicals in everyday products⁷¹.

A 2023 study by Greenpeace Germany to assess pesticide residues on limes across Europe found pesticide residues in 51 of the 52 samples, including for six active substances that are either not authorised or banned in the EU²³. In the 51 samples with residues, Greenpeace detected 27 different pesticide active substances. While none of the residues exceeded the MRL, Greenpeace's report notes that there is no safe level of pesticide exposure — and that MRLs do not account for unknown interactions between various agrochemicals^{23,68}.

Additionally, the maximum residue limits (MRLs) for agrochemicals vary⁷². The MRLs for some of the toxic substances allowed for treating soy crops (including acephate, glufosinate, and glyphosate) are higher than the allowed MRLs for other crops. MRLs may be established or revised upon request (known as “import tolerances”) from parties with a legitimate interest, including companies manufacturing these products. For example, the pesticide company Corteva requested an import tolerance on glyphosate in 2021 for genetically modified soybeans imported from the US (see ‘Box 6: GMOs on European Plates’).

In the case of Corteva's request, the European Safety Authority determined that an import tolerance increase wasn't necessary. Regardless, it said that “the short-term

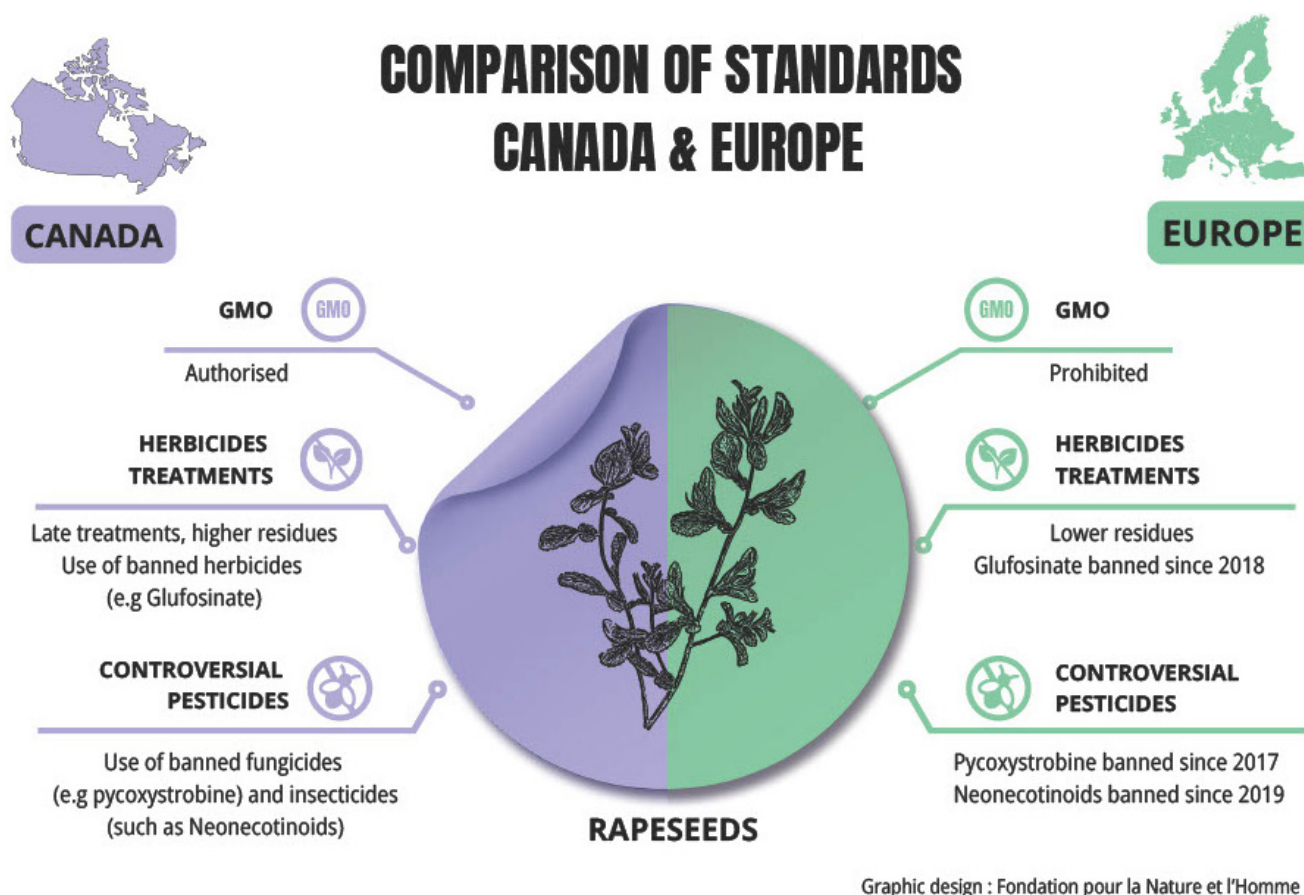
and long-term intake of residues resulting from the existing uses of glyphosate and the import tolerance on soybeans is unlikely to present a risk to consumer health” — but admitted that the risks of chronic exposure remained difficult to calculate⁷³. Indeed, even low levels of pesticide exposure may have harmful effects⁶⁸. As highlighted in the previous section (see ‘The Climate Crisis: Imported livestock feed relies on agrochemicals that harm biodiversity’), soybeans are the most pesticide-intensive crop in Brazil⁵⁹, and Brazil is the largest exporter of soy globally to the EU. This means that much of the EU's livestock herd is fed a diet of pesticide-treated grain, which can be stored in its fatty tissues and later ingested by consumers^{74,75}.

Concerns about pesticides in animal feed are not limited to soy: Canadian rapeseed (also known as canola) is subject to different production standards than the EU allows (see Figure 2). Among the roughly twenty active herbicide substances approved for canola cultivation in Canada, only half are authorised in the EU^{64,76}. In Canada, spraying rapeseed crops with glyphosate is permitted far later in the harvest, exposing the growing seeds — the part of the plant to be consumed — to the chemical⁷⁷.

BOX 6: GMOS ON EUROPEAN PLATES

The EU generally restricts the cultivation of genetically modified organisms (GMOs). But 94% of US-grown and 97% of Brazil-grown soy is genetically modified⁷⁸. This means that GMOs still make it onto European plates via animal products fed with GMO soy, which go unlabelled even though labelling GMO food imports is mandatory^{79,80}. GMOs are also strongly correlated with the use of glyphosate, a highly effective broad-spectrum herbicide that the World Health Organization has categorised as a 2a carcinogen, meaning it probably causes cancer in humans^{78,81,82}.

Figure 2: Comparison of Standards: Rapeseed Production in Canada and the EU



Source: *Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System. Feedback EU and partners. (2024).*

Antibiotics and growth hormones

The EU has banned the use of antibiotics as growth promoters in livestock since 2006⁸³. In 2018, the EU introduced further restrictions prohibiting the use of antimicrobials to prevent the rise of antibiotic-resistant bacteria. The EU has created a so-called mirror measure to extend this ban to third-country operators wishing to export animal products to the EU but this measure has major gaps^{84,85}:

- It concerns only antibiotics considered medicinal products and not feed additives, therefore covering a small proportion of use in third-country producers.
- It will come into force only from 2026, and the implementing act defining the list of third countries authorised to export their animal products to the EU has still not been published.

- The first implementing act, published in January 2024, requires third-country operators to complete a self-declaration and veterinary report attesting that the product complies with the ban set by EU regulations, making it vulnerable to non-compliance.

The issue is further compounded by limits regarding the traceability of cattle in third countries. The EU requires the full traceability of animals from birth to slaughter for livestock within its borders. However, this requirement does not apply to animal products imported from countries outside the EU: only traceability during the fattening and finishing period is required by the European authorities for imports^{21,84,85}. This traceability gap poses significant challenges for implementing mirror measures on antibiotics, as well as addressing imported deforestation (see 'The Climate Crisis: Beef and livestock feed imported into the EU contribute to deforestation').

In Brazil, for example, traceability is not mandatory, except in the state of Santa Catarina²¹. Although a national cattle identification system exists, producers' adherence to it is generally voluntary²¹. Additionally, while some antibiotic substances are now banned, several remain in use in cattle farming, mainly as growth stimulators²¹.

BOX 7: WHO BENEFITS FROM TRADE DEALS?

According to a 2023 report by Greenpeace Germany on the EU-Mercosur trade agreement, the main EU exporters of pesticides to the Mercosur region are France and Belgium. These two countries, however, do not have national corporations active in the pesticide market⁸⁶; rather, subsidiaries of other companies from countries including India, the US, and Switzerland make up large shares of the French and Belgian markets, using these countries only as a base to export highly hazardous pesticides outside Europe. According to Greenpeace Germany, this analysis demonstrates that “non-EU companies will also benefit from the EU-Mercosur trade agreement, disproving the notion that trade deals are about geographic competition or advantage. They are corporate deals made at the expense of people and the planet” (p.6)²³.

BEEF AND LIVESTOCK FEED IMPORTED INTO THE EU CREATE RISKS TO HUMAN HEALTH BY PROMOTING MEAT-HEAVY DIETS

Beef and livestock feed imported into the EU cause risks to human health by enabling meat-heavy diets that increase the risk of NCDs. The International Agency for Research on Cancer (IARC) classifies the consumption of red meat as “probably carcinogenic” and the consumption of processed meat as “carcinogenic” to humans⁸⁷. Other studies have shown that eating just two servings of red meat per week is associated with a higher risk of Type 2 diabetes⁸⁸ and that each 50g/

higher intake of unprocessed red meat increased the risk of coronary heart disease by 9% (a figure that jumps to 18% for 50g/higher per day intake of processed meats)⁸⁹. A scientific opinion on sustainable food commissioned by the European Commission stressed the need to tax red meat products to address what is currently seen as over-consumption⁹⁰. The same report also argues that the impact of the food system on public health, including obesity and NCDs, “can be addressed by transitioning to a more plant-based diet, sustainably sourced fish and seafood, and lower meat, processed meat, salt, added sugar, and high-fat animal product consumption”⁹⁰.

The EU Agricultural Outlook 2023-2035 notes that while plant-based diets are increasingly popular in the EU, “animal protein is expected to remain the dominant source of protein consumed in the EU in the future (around 60%)”^{19,91}. The popularity of animal protein relates to agri-trade policy: giving access to the EU market for soy imports to maintain the size of the EU's livestock sector maintains a plentiful supply of meat for EU consumers, largely to the benefit of large corporations⁹². If there is supply, agrifood corporations will ensure that there is demand: ‘Big Meat’ lobbyists, using a playbook gleaned from fossil fuel companies, “are turning up in record numbers” at events such as UN climate conferences (or ‘COPs’) and working behind the scenes to promote the industrial livestock sector^{93,94}. A 2021 analysis by Greenpeace found that from 2016-2020, the EU spent €252.4 million to promote European meat and dairy products (while just €146.4 million went to fruit and vegetables)⁹⁵. Lobbying by meat companies simultaneously co-opts public money to create demand for their products while disparaging alternatives: corporate influence has been a key driver in the recent ban on cultured meat in Italy⁹⁶ as well as the shelving or stalling of key pieces of EU sustainable food legislation, including the Sustainable Food Systems Framework intended to be the flagship outcome of the Farm to Fork Strategy⁹⁷.

3. FOOD SECURITY AND EU FARMERS' LIVELIHOODS

RELEVANT EU GOALS:

Sustainable Development Goals³⁵

- Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture

Farm to Fork Strategy³⁶

- Ensure food security, nutrition and public health, making sure that everyone has access to sufficient, safe, nutritious, sustainable food
- Preserve affordability of food while generating fairer economic returns, fostering competitiveness of the EU supply sector and promoting fair trade

EU Protein Strategy (Briefing)⁹⁸

- Increase the EU production of plant-based proteins

This section highlights the twin challenges created by unsustainable agri-trade policy: food insecurity and the undercutting of EU farmers' livelihoods, which in turn has resulted in rollbacks of key pieces of environmental policy. Additionally, the inefficient use of land and resources to grow plant proteins for animal feed, rather than food, limits the number of calories available for human consumption². These issues relate to trade policy (high volume of duty-free imports) as well as European agricultural policy (e.g., the CAP).

IMPORT DEPENDENCY PUTS EU FOOD SECURITY AT RISK

Despite its self-sufficiency in many agricultural products, the EU has a major deficit in vegetable proteins due to the high demand from the livestock sector, which cannot be met domestically⁹⁹. The EU's self-sufficiency in soy meal is 3% and rapeseed 69%¹. This reliance on imported plant proteins puts the EU's food security at risk. The EU has long aimed to reduce its domestic protein deficiency⁹⁸. Needing to import so much of the feed that EU livestock relies on means that the EU is vulnerable to supply chain shocks from natural disasters, pandemics, and geopolitical crises¹⁰⁰; for example, the EU imports the second-largest amount of its rapeseed from Ukraine⁴⁶ (and has continued to import wheat from Russia even after its 2022 Ukraine invasion¹⁰¹).

The cumulative effects of these events has had a negative impact on EU consumers, particularly lower-income households. In December 2022, following the COVID-19 pandemic and the outbreak of the war in Ukraine, inflation on foodstuffs in the eurozone reached 13.8%, up from 3.2% in 2021¹⁰². A draft report adopted by the European Parliament in October 2023 on a future European Protein Strategy urged the Commission to present a comprehensive EU protein strategy and stated that:

European resilience levels need to be significantly strengthened in crucial sectors such as food and feed supply by reducing, as far as possible, dependencies on agricultural products and resources from just one or a few suppliers through stronger domestic production.⁹⁸

Despite these statements, the fact remains that due to WTO negotiations dating back to 1962, imports of soy products soy benefit from entering the EU market duty-free^{21, h}. Some exporting markets, like Argentina, impose export taxes on soy. In the summer of 2024, the new Argentine president Javier Milei pledged to remove these taxes in response to discontent from Argentine farmers¹⁰³. Indeed, if the EU-Mercosur Trade Agreement were to be ratified, these taxes would be ended, further driving an influx of competitively priced imported soy into the EU. In Argentina, increases in cropped areas for soy cultivation have already led to an increase in the use of pesticides, and soy production in both Argentina and Brazil has been implicated in deforestation that wouldn't be protected under the current geographic scope of the EUDR²¹.

FOCUSING ON LIVESTOCK FEED DIMINISHES THE EU'S CAPACITY TO GROW FOOD FOR HUMAN CONSUMPTION

Protein-crop production in the EU has increased in the last decade. However, there continues to be a significant shortfall in domestic production of these crops as the size of the EU's livestock herd has also increased.¹ This has consolidated the EU's heavy dependence on imports of protein-rich crops from non-EU countries¹⁰⁴. Currently, EU Member States only devote 3% of their agricultural land to plant-based proteins¹⁰², making the EU depend on third countries¹⁰². Meanwhile, over 71% of EU farmland is used to produce fodder for livestock farms¹⁰⁵. While consumers are increasing

^h Imports of oilseeds and meals into the EU have been duty-free since the Dillon Round of GATT (1962).

ⁱ The deficit is in protein-rich plants with a crude protein content of more than 15% (oilseeds such as rapeseed, sunflower seeds and soya beans; pulses including beans, peas, lentils, lupins, and more; and fodder legumes: mainly alfalfa and clover), accounting for about 1/4 of the total crude plant protein supply in the EU.

their consumption of plant-based proteins¹⁹, the livestock sector's need to secure sufficient animal feed competes with this demand¹⁰⁶. For example, in 2018-2019, 53% of the EU's supply of protein-rich pulses was used for animal feed¹⁰⁷. The issue of European protein autonomy is linked as much to the evolution of livestock systems — which, as this report has sought to demonstrate, are tied closely to issues of trade — as to European plant protein production.

Consumption of animal products impacts the demand for vegetable proteins used to feed livestock. For the EU, the pursuit of greater protein independence is part of the choice to promote a more input-autonomous and sustainable agriculture. Converting the current mix of crop uses worldwide to growing food exclusively for direct human consumption, would make 70% more calories available¹⁰⁸. In contrast, maintaining business-as-usual livestock production would require an increase in edible crops grown by 2050¹⁰⁹, with tremendous impacts on land use, climate change, biodiversity, and rural communities. For these reasons, trade policies, such as the EU-Mercosur trade deal, which drive land expansion for feed production, even indirectly, pose a significant threat to global and EU food security¹¹⁰. By enabling large-scale livestock production, duty-free imports of livestock feed undermine the bloc's ability to incentivize growing more plant-based proteins for human consumption.

There are signs that trends are beginning to shift in the right direction. The EU is expected to remain a net importer of oilseeds and protein crops through to 2035 but imports are expected to decrease by 17%¹¹¹. Human

consumption of pulses in the EU is also expected to increase by 61% between 2021-2023 and 2035; however, most of these pulses will still end up in livestock feed¹¹¹. The 2022-2023 Commission medium-term agricultural outlook report expects domestic soybean production to increase by over one-third in the next decade¹⁹. Further commitments to fostering EU-grown plant proteins, including alternative feed materials (i.e. insects, marine feed, algae and by-products) were made in the Farm to Fork strategy, but no comprehensive protein plan has been announced. Additionally, the introduction of eco-regimes in the CAP that could have resulted in incentives to develop the cultivation of plant proteins, for example, through measures to promote crop diversification in crop rotations¹¹², have been rolled back under political pressure (see the following section for more detail) partially driven by political discontent related to agri-trade policy.

FREE-TRADE AGREEMENTS (EXISTING AND POTENTIAL) CREATE THE RISK OF DISTORTING COMPETITION, WHICH IS DETRIMENTAL TO FARMERS' LIVELIHOODS AND ENVIRONMENTAL POLICY

The EU's reliance on cost-competitive livestock imports has also undercut EU farmers. In early 2024, farmers across the EU staged widespread protests over the multiple pressures they were enduring^{3,113}. Many protestors highlighted the double standards that allow imported agricultural products — produced under different environmental, sanitary, and labour standards — to enter the European market, causing trade distortions that undercut EU farmers who are required to adhere to more stringent regulations. These



Credit: Ieva Brinkmane/Pexels

protests underscored the growing tension between the EU's trade policy, its sustainability goals, and the economic realities faced by EU farmers, whose income is significantly less than the EU average¹¹⁴.

The EU has strict production requirements related to the environment and climate, animal welfare, and food safety — often far more strict than countries that export products to the bloc¹⁰⁶. In some cases, the EU has introduced mirror measures and/or mirror clauses (see Box 4) to rectify these inconsistencies. However, if the scope or implementation of these clauses is not sufficient (e.g., soy linked to deforestation being able to be imported from areas outside of Amazonia, import tolerances for banned pesticides, issues with the traceability of beef that may be reared using growth hormones), it can cause distortions in the market that make it more difficult for EU farmers to remain price competitive.

EU farmers are under a lot of economic pressure: in 2020, there were 5.3 million fewer farms in the EU than in 2005, with the losses nearly exclusively coming from small and medium farms^{115–117}. For many farmers, times are tough. According to a briefing by Allianz Research, higher prices commanded by record-high food inflation in the EU have not benefitted the bloc's farmers, with real incomes dropping by 12% in the EU and as much as 22% in France between 2022 and 2023¹¹⁸. Retailers and food companies impose low prices on farmers, while agrochemical companies hike prices for necessary inputs¹¹⁶. EU farmers are suffering from the impacts of the climate crisis, including droughts, extreme

heat, wildfires, and floods^{116,119}. Farmers felt undercut by the EU's decision to allow tariff-free goods into the block from Ukraine following Russia's crippling of its agricultural trade routes¹²⁰. The yet-to-be-ratified EU-Mercosur agreement could also flood the EU market with large quantities of beef and other commodities produced under less stringent standards¹²¹.

Certain farming lobbies took advantage of farmers' anger to frame the issue not as unfair geopolitical and economic decision-making but rather as the threat of heavy-handed environmental protection. In response to pressure from lobbyists, EU policymakers ended up rolling back several key 'good agricultural and environmental conditions' (GAEC) which were to be added to the CAP as part of the Green Deal, eliminating requirements for farmers on:

- Leaving part of their farm fallow to promote biodiversity (GAEC 8)
- Ensuring good practices such as soil cover (GAEC 6)
- Low tillage (GAEC 5)
- Crop rotation (GAEC 7)

The changes exempted all farms below 10 hectares in size from any conditionality rule or controls³. An analysis by Greenpeace noted that these rollbacks mean that none of the major agricultural policies part of the European Green Deal have been implemented, despite the fact they would benefit EU farmers, and that accordingly, none of the Farm 2 Fork Strategy targets have been reached¹¹⁶.

BOX 8: QUANTIFYING TRADE DISTORTION

Quantifying the costs of EU regulations on producers is challenging, but looking at beef can give us an idea of how producers have widely different production costs across the globe. A study commissioned by the European Commission (DG Agri) in 2011 and published in 2014 estimated the total additional cost linked to compliance with regulation for EU beef producers to be between 0.5% and 3% of the cost of production¹²², while another study by the Institut d'Elevage in 2001 estimated the cost of complying with particular regulations to be around 8%¹²². The Institut d'Elevage also looked at cost reductions in lower-regulation environments, finding that antibiotics that help animals grow more quickly can allow farmers to reduce their feeding costs by 7-8%¹²².

These distortions will pose serious issues for EU farmers if the EU-Mercosur trade agreement goes ahead. Beef from Mercosur, which accounts for 25% of the world's beef production and one-third of the world's beef trade, is cheaper than beef produced in the EU across all production stages²¹. According to a study commissioned by the Greens/EFA Group in the European Parliament, if the EU-Mercosur agreement were to be ratified, modelling scenarios show an increase in the share of certain cuts of beef on the EU market from 13% in 2019 to 21%-26% in 2030²¹. As these cuts are equal to one-third of the value of adult cattle in the EU, the implementation of the Mercosur deal poses a major threat to the revenues of European beef producers²¹. Organisations representing the EU farming sector released a statement in October 2024 arguing that "the overall outcome of the EU-Mercosur FTA negotiations would expose the EU agri-food sector to unfair competition with negative consequences for farmers' livelihoods, wages, working conditions and employment" and calling for the EU take into account principles of economic, social, and environmental responsibility in rejecting the deal¹²¹.

The rollbacks demonstrate a vicious cycle in which agricultural practices that drive climate change continue — and farmers are then impacted negatively by climate change, in turn impacting the EU's food security. While far-right political parties disingenuously co-opted the protests to frame them as solely being about the negative impact of "green" policies, the truth is that EU farmers are being undercut by bilateral trade agreements that also cause environmental and social harm in third countries.

VOICES FROM EU FARMERS

“ In France and Europe, we were close to self-sufficiency in rapeseed, but for several years, imports of rapeseed from Canada or Australia have undermined this self-sufficiency. The problem is not, as one might hear, European environmental standards that protect biodiversity and the environment. We need biodiversity to produce. The problem is that these imports, with less stringent standards, undermine our competitiveness. ”

Jean-Bernard Lozier, rapeseed producer (originally published in 'Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System' by Feedback EU and partners).

BOX 9: IMPORTED LIVESTOCK FEED SUPPORTS AN INDUSTRIAL FARMING MODEL THAT FOSTERS BAD CONDITIONS FOR EU WORKERS — MANY OF THEM MIGRANTS

In the EU, the livestock sector employs over 4 million workers, mainly concentrated in new Member States¹²³. Given that about one-quarter of the EU's agricultural labour force works on large, non-family farms, we can assume that many livestock workers are industrial-scale operations¹¹⁷. Workers on factory farmers and throughout the meat processing supply chain are often migrant and/or undocumented labourers, who are made to live and work in appalling conditions^{124,125}. Workers have reported living in squalid accommodation while not being granted any sick leave and being forced to work undefined hours¹²⁴. While a full analysis of the link between workers' rights and EU trade policy is beyond the scope of this paper, the fact is that massive imports of livestock feed into the EU are what sustains the industrial farming sector — and therefore, trade policy is also a labour justice issue, particularly for marginalised migrant populations.

4. GLOBAL EQUITY

RELEVANT EU GOALS:

Sustainable Development Goals³⁵

- Goal 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture
- Goal 3: Ensure healthy lives and promote well-being for all at all ages
- Goal 5: Achieve gender equality and empower all women and girls
- Goal 12: Ensure sustainable consumption and production patterns
- Goal 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

Through imports of beef, soy, and rapeseed, the EU is playing a role in undermining public health in third countries as well as perpetuating neo-colonialist forms of agrarian extractivism^{126,127}. The EU has acknowledged the impact of its supply chains on third countries by introducing mirror measures on labour conditions and environmental destruction (see Box 4). However, significant gaps remain.

IMPORTED COMMODITIES AND EXPORTED PESTICIDES CREATE UNFAIR AND DANGEROUS CONDITIONS FOR WORKERS AND COMMUNITIES IN THIRD COUNTRIES

Agrochemicals permitted in EU supply chains can be dangerous to human health (see 'Public Health: Beef and livestock feed imported into the EU contain agrochemicals that are dangerous to human health'). In some cases, these chemicals, despite being banned or not approved for use in the EU, are actually produced by European companies such as Bayer, Syngenta, and BASF and exported to third countries with different regulations on pesticides and herbicides^{86,126}. This is an egregious double standard in terms of respect for public health and the environment within and beyond the EU's borders, and emblematic of the neo-colonial dynamics that underpin the EU's trade policy as what scholars have termed "molecular colonialism"^{127,128}.

The former European colonies of Latin America, which have already seen much of their natural wealth plundered through violence and genocide, are now experiencing another phase of colonialism, which is not only characterised by the physical violence involved in the displacement of traditional peoples and communities who are driven from their land to make way for "modern" agriculture. The peoples of Mercosur's countries are, to a great extent, also under assault from a kind of chemical violence, evidenced by the large number of people poisoned by substances developed and often sold by countries in the EU.¹²⁷

While regulatory gaps mean that EU consumers may inadvertently consume residues of banned or unapproved pesticides, the quantities imposed on populations in third countries are far higher. Brazil is the largest exporter of soy to the EU, and soybeans are the most pesticide-intensive crop in Brazil⁵⁹. Between 2011 and 2021, over 29,000 pesticide poisonings in Brazil were recorded¹²⁹. In a similar time frame, between 2010 and 2019, more than 1,800 people died by poisoning from pesticides used on Brazilian farms, i.e. one death from pesticide poisoning every two days. Around 20% of these victims are children and adolescents between the ages of 0 and 19, and Indigenous communities have been disproportionately impacted^{126,127}. A study of the Mato Grosso region of Brazil, where soy is grown intensively, found pesticide residues in 88% of the plants collected, including medicinal herbs and fruits. In the last ten years, cancer rates among Indigenous populations in the area have increased by 137%¹³⁰.

This exposure is compounded by agricultural practices such as the aerial spraying of soy crops with pesticides, which is permitted in Brazil. As pesticides can spread even further and more extensively with aerial rather than direct spraying, this practice puts local communities at higher risk. Pesticides can travel in the wind over 1,000 kilometres from spray zones, and people can be unintentionally exposed to such pesticides in various situations: on the field, in the forest, through food or drinking water¹³⁰.

BOX 10: FURTHER READING ON GLOBAL INEQUITY IN EU AGRI-TRADE POLICY

Greenpeace *et al.* 2024. "Toxic Double Standards: How Europe Sells Products Deemed Too Dangerous for Europeans to the Rest of the World." (<https://www.greenpeace.org/static/planet4-eu-unit-stateless/2024/09/54eba298-toxic-double-standards-ngo-briefing-sept.-2024-with-corrections.pdf>)

IMPORTED SOY IS IMPLICATED IN LAND GRABBING AND HAS ADVERSE IMPACTS ON INDIGENOUS COMMUNITIES

Soy imported by the EU to sustain its livestock herd has been implicated in land-grabbing from Indigenous communities²⁶. Farm cooperatives in Brazil that supply some of the world's biggest agricultural firms with soybeans — for which the EU is Brazil's second-largest market — are illegally using land on Indigenous reservations¹³¹. Infrastructure built by agrifood companies to process soy threatens Indigenous land^{132,133}. For example, Cargill recently proposed to build a \$150 million port in the north of Brazil on land traditionally owned by fishermen and acai gatherers who are descendants of formerly enslaved African people and hold special land rights in Brazil¹³³. These residents sued Cargill in federal court on claims that the company had acquired the land through fraudulent means¹³³. This kind of illegal land grabbing increases the risk of conflict between soy producers and traditional communities, reduces rural populations' access to the natural resources necessary for a healthy life, increases migration to cities, reduces the availability of rural jobs, and increases poverty and inequality¹³⁴.

Again, neocolonial patterns of exploitation are evident here. While around 84% of EU exports to Mercosur are services and high-value industrial products, 75% of Mercosur exports to the EU are agricultural and mineral resources that rely on land use change and extraction, mirroring dynamics in place since the late 15th century¹²⁶.

THE EU IS IMPORTING GENDER INEQUITY WITH ITS SOY, BEEF, AND RAPESEED

Unsustainable practices in the supply chains of EU imports impact women in third countries in specific ways. Firstly, socio-economic inequities in agricultural work make women workers particularly vulnerable. In Brazil, women make up 10% of the labour force in the national soy sector, yet they earn approximately 25% less than men¹³⁵. Additionally, less than 15% of land in Brazil is registered to women, and women make up the majority of landless people in the country¹³⁵ — meaning that illegal land grabs can increase the vulnerability of an already marginalised group. Deforestation and land degradation have a particularly severe effect on women, who are often responsible for food and water sourcing and are more likely to depend on forest resources for their daily subsistence and livelihoods¹³⁶.

The EUDR, while a good first step towards cracking down on deforestation in EU supply chains, covers only a limited amount of land (see 'The Climate Crisis: Beef and livestock

feed imported into the EU contribute to deforestation') and has been criticised by advocacy groups for being gender-blind, in that it does not require exporting nations to comply with international standards on gender and human rights¹³⁷.

Agrochemicals also have gendered impacts. In many countries, women disproportionately carry out the work of pesticide spraying (often without adequate protection) even as they are excluded from decision-making related to pesticide application^{138,139}. It's not only women agricultural workers who are impacted; women in farming households are often exposed to pesticides through household chores like washing clothes and cleaning up equipment¹³⁸. As women have a higher percentage of body fat, agrochemicals bioaccumulate in their bodies at higher rates¹³⁹. Glyphosate, a herbicide widely used in GMO soy production as well as on imported rapeseed/canola, has a particularly harmful effect on women's health, having been associated with breast cancer, miscarriage, and birth defects¹⁴⁰. A study conducted in the southwest region of the Paraná state in Brazil, where intensive pesticide use is common, found that women in the region had a 41% higher rate of breast cancer diagnosis and 14% higher breast cancer mortality rates than average rates in the country as a whole¹⁴¹.

In these ways, the EU is importing gender inequity straight into its feedlots and onto consumers' plates.



Credit: sagar sintan/Pexels

5. ANIMAL WELFARE

RELEVANT EU GOALS:

*Farm to Fork Strategy*³⁶

- EU trade policy should contribute to enhance cooperation with and to obtain ambitious commitments from third countries in key areas such as animal welfare, the use of pesticides and the fight against antimicrobial resistance.

As recently as 2021, over 9 billion land animals were slaughtered in the EU every year, 72% of whom were reared on what constitutes “very large” farms^{125,142}. Putting aside the issue of whether animal welfare standards on such large farms can be assured, Council Directive 98/58/EC lays down the minimum standards for the protection of all farmed animals, while specific directives are in place to protect different species.

However, third countries importing meat into the EU may not have the same animal welfare requirements. This means that once again, the food on EU consumers’ plates may not be meeting EU regulations.

IMPORTED BEEF MAY NOT MEET THE EU’S REQUIREMENTS ON ANIMAL WELFARE REGULATIONS

The EU is largely self-sufficient in beef, producing more (106%) than it consumes¹⁴³. Regardless, it imports around 300 million tonnes of beef per year, largely in high-value cuts like loin muscle¹⁴⁴. Most beef comes from the United Kingdom (UK), followed by Brazil and Argentina.

While the EU positions itself as a global leader in animal welfare by setting strict rules for animal feed and livestock breeding, transport, and slaughter conditions, most



Credit: Sandsun / Shutterstock

obligations do not apply to imported meat. When it comes to imports, only welfare at the time of slaughter is taken into consideration^{145,146}. In Brazil, the second-largest beef exporter to the EU, animal welfare checks on farms and slaughterhouses are not regularly carried out¹⁴⁷. In Argentina, the third-largest exporter, the humane slaughter of animals is not required¹⁴⁷. This means that beef consumed in the EU may not have followed requirements on animal welfare, despite the EU's goals to improve animal welfare in its supply chains. Gaps in requirements on tracing livestock (see 'Public Health: Beef and livestock feed imported into the EU contain agrochemicals that are dangerous to human health') across its lifecycle compound the problem of monitoring animal welfare in imported beef.

There is strong public support in the EU for more stringent import requirements: the special 2023 Eurobarometer survey on animal welfare found that 93% of European citizens want imported animal products to respect the same animal welfare standards as those applied in the EU¹⁴⁸.

VOICES FROM EU FARMERS

“ Due to international agreements, it's possible to import beef from farms with much more intensive practices than ours. And when people go shopping, they don't even know it's possible, and on top of that, the information isn't easily accessible. This lack of transparency undermines our sectors and is putting us in a situation of unfair competition. ”

Claire Juillet, beef producer (originally published in 'Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System' by Feedback EU and partners).



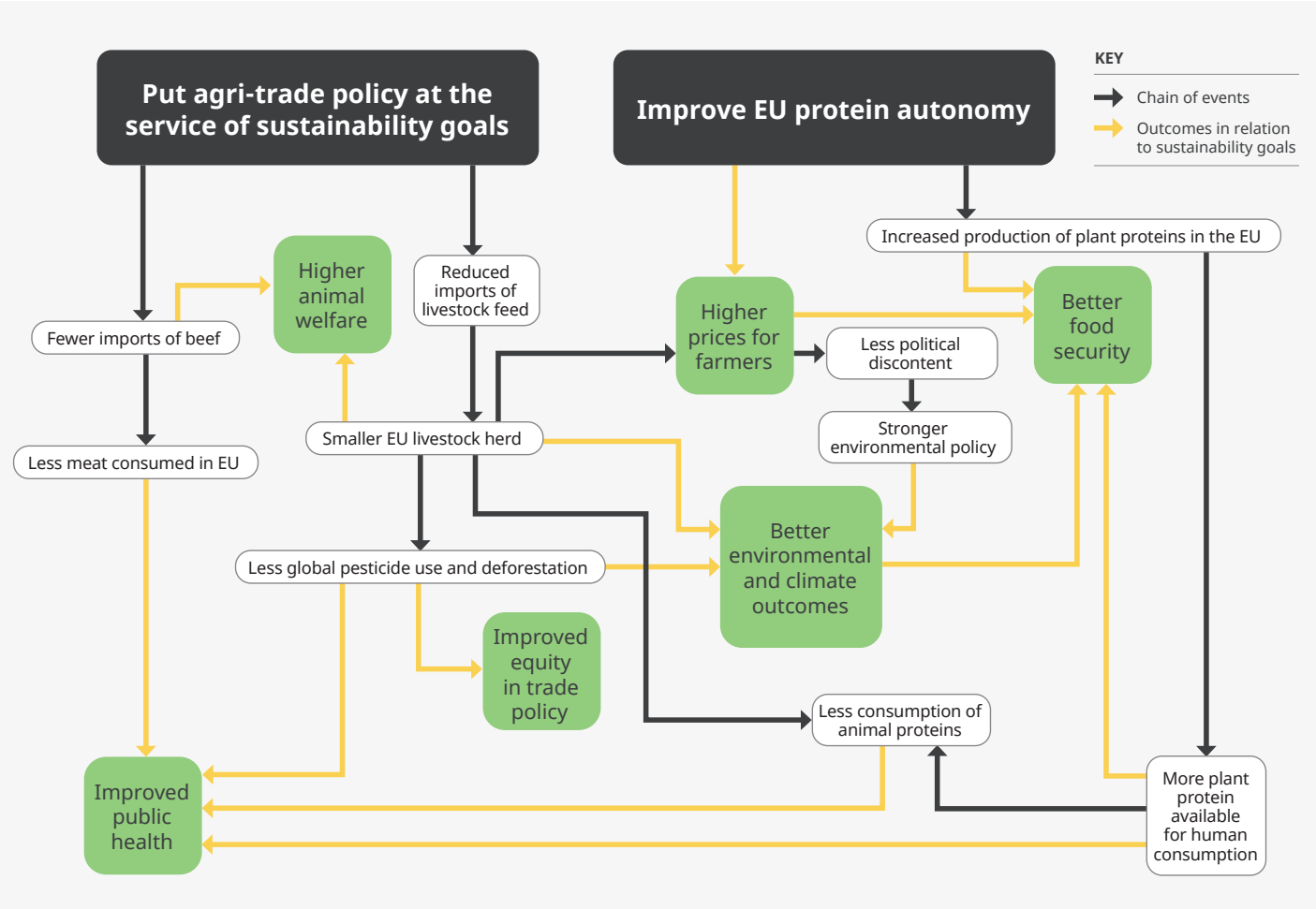
Credit: Sergey Ryzhov / Shutterstock

RECOMMENDATIONS

This report highlights five key areas where EU trade policy currently undermines food sustainability goals. Policymakers must urgently act on these areas if the EU is to meet the ambitions of the Green Deal. Integrating sustainability into trade policy will allow policymakers

to tackle multiple issues simultaneously: the urgency of promoting more plant-based diets, public health, global equity, food security, farmer’s livelihoods, and animal welfare (see Figure 3). To address these concerns, the report proposes several policy recommendations.

Figure 3: Agri-trade policy framework



Credits: Feedback EU, 2024

1. PUT EU AGRI-TRADE POLICY AT THE SERVICE OF SUSTAINABLE FOOD SYSTEM TRANSFORMATION

1.1 CHAMPION NEW POSSIBILITIES FOR INTEGRATING SUSTAINABILITY AND TRADE

The EU should work to define more ambitious international standards on sustainability in food products, and the new 2024-2029 EU legislative period is a critical opportunity for the EU to act boldly on integrating sustainability and trade. The Strategic Dialogue on the Future of EU Agriculture argues that to do so, the EU should:

adopt import requirements in EU law in ways that are consistent with the rules of WTO: to benefit EU farmers, workers, businesses, citizens, sustainability, and animal welfare, to preserve EU safe and high-quality production standards for all agricultural products. This could be done by assessing existing concepts already recognised in WTO agreements (such as equivalence or reciprocity models) or develop new approaches which ensure fairness for EU farmers as well as trading partners. (p.48)²⁴

Under WTO rules, the EU can use Article XX of the GATT to justify measures if they are necessary and not applied in a discriminatory or disguised restrictive manner¹⁴⁹. This provides an option for the EU to end national exemptions for banned pesticides and stop their export to countries outside the bloc. Another mechanism at the EU's disposal is to work with or innovate on the Codex Alimentarius, which serves as an international code on minimum mandatory health and safety standards in food production. The code does not currently cover environmental sustainability¹⁵⁰. However, the World Wildlife Fund (WWF) and partners have recently developed a model for a "Codex Planetarius" that defines environmental standards for producing globally traded food, modelled on the Codex Alimentarius^{150,151}. Given its political influence and power as one of the world's largest trading blocs, the EU should urgently support the development and ratification of such updated standards, including their integration into the frameworks of international bodies such as the WTO¹⁵⁰. This would allow the EU to demonstrate global political leadership in food sustainability and green policy while levelling the playing field for producers at home and abroad.

1.2 CONDUCT SUSTAINABILITY ASSESSMENTS OF NEW AND EXISTING TRADE AGREEMENTS

In addition to championing new global standards on environmental protection in food production, the EU should conduct sustainability assessments before ratifying any new trade agreements. This type of assessment will be particularly important prior to formally ratifying the trade deal with Mercosur countries. This suggestion was also made in the Strategic Dialogue on the Future of EU Agriculture, which urges the Commission to conduct impact assessments in any future trade negotiations that include "concrete and scientific comparison and mapping of production methods and standards as well as conclusions on their impact for agricultural producers, the environment, health, labour, animal welfare, businesses, and consumers in both EU and partner countries" (p.49)²⁴. The Strategic Dialogue report also highlights that these assessments should include detailed information on the context of production in potential partner countries²⁴.

While the EU already committed to strengthening non-compliance measures in its Trade and Sustainable Development (TSD) chapters in its bilateral trade policies from 2022 onwards, this method has notable flaws. For example, there is no stipulation on pre-agreement cooperation on sustainability, which would enable partner countries to implement national policy frameworks on sustainability regardless of the negotiation outcome¹⁵². Additionally, while TSDs integrate the objectives of the Paris Agreement and standards from the International Labour Organization (ILO), there is no assessment of compliance with other multilateral agreements, including SDG priorities such as biodiversity conservation and public health¹⁵².

In addition to assessments of new trade deals, the EU should also require periodic reviews of agreements already signed. This would allow the EU to see what trade agreements are unfit for purpose against its own goals of a sustainable food transition and to assess what changes need to be made. Additionally, all existing derogations to environmental, health, and equity standards given on a bilateral basis (see Box 2) should be reviewed against sustainability standards.

The nascent Codex Planetarius (see Recommendation 1.1) could provide a strong blueprint or methodology for integrating more ambitious objectives into trade agreements. Any trade agreements that encourage the exchange of products harmful to the environment, climate, public health, and animal welfare and do not meet core sustainability objectives should be opposed. While often implicit in any discussion of labour, health, and environment, gender equity should be made an explicit indicator in such impact assessments.

1.3 STRENGTHEN MIRROR MEASURES RELATED TO HEALTH AND SUSTAINABILITY

“Mirror measures” refer to setting import requirements equivalent to EU production standards (see Box 4). The EU has tabled several mirror measures in recent years (e.g., the yet-to-be-implemented EUDR, a forthcoming regulation on forced labour in supply chains, and the regulation banning traces of two neonicotinoids in imported products). However, numerous shortcomings remain (see Recommendation 1.4). More broadly, there is still a lack of more systematic action on the gaps in production standards between European and imported products, such as through the use of mirror measures¹⁵³.

Mirror measures are the focus of the November 2024 report ‘Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System’ by Feedback EU and partners (The National Centre for Development Cooperation, Slow Food, The Foundation for Nature and Mankind, SEO/Birdlife, Humundi, and The Veblen Institute for Economic Reforms). The report provides a technical overview of where current mirror measures fall short and detailed recommendations on strengthening them. It recommends EU policymakers to:

- Generalise the principle of mirror measures by adopting a regulation on the mitigation of environmental and health impacts associated with food imported to the EU.

- Adopt a ‘mirror measures reflex’: systematically consider including provisions on the treatment of imported and exported goods in all landmark EU legislation, at every stage, particularly in impact studies, consultations, or when drafting legislative proposals.
- Ensure that the design and implementation of mirror measures do not burden vulnerable countries and producers in international value chains.^j

These proposals will help to rectify trade distortions created by double standards in trade policy, improving the competitiveness of EU farmers. They will also protect the health of EU consumers and improve environmental standards in global production.

1.4 CLOSE GAPS IN CURRENT IMPORT REGULATIONS AND IMPROVE ENFORCEMENT CAPACITIES

A key issue with some mirror measures in the EU is the lack of enforcement capacity and/or gaps in the scope of the regulation. While shifting towards the more coherent sustainability frameworks outlined in Recommendation 1.1, the EU should seek to close these gaps and bolster its capacities to ensure that regulations are being enforced.

The now-delayed EUDR, for example, should be implemented as soon as possible, and its scope should be urgently revisited, as sensitive biomes at great risk of deforestation have been left out. The EU should pledge to adhere to “zero products from imported deforestation” regardless of origin and the regulation should cover areas including wooded lands (in order to protect peatlands and forested savannahs).

Through mirror measures, trade partners should be required to adhere to standards equivalent to those in force in the EU for animal agriculture in third countries, particularly regarding breeding conditions, transport, and traceability. To do so, the EU should improve and increase import checks to ensure compliance with EU standards (e.g., on imported deforestation, animal welfare, and the use of antibiotics/growth hormones). This would require strengthening the resources and capabilities of customs, veterinary, and phytosanitary authorities regarding all new sustainable import requirements.

j See “Double Standards on Our Plates: Using Mirror Measures to Mitigate the Impacts of EU Trade Policy for a Sustainable Food System” (2024) by Feedback EU and partners for more detailed technical proposals on policy design of mirror measures.

1.5 END DOUBLE STANDARDS AND INCONSISTENCIES ON THE USE AND EXPORT OF BANNED SUBSTANCES

The Strategic Dialogue on the Future of EU Agriculture highlights the need to end “unethical” double standards in EU trade policy²⁴. This includes exporting banned pesticides to countries with less stringent regulations, which also risks the re-import of residues of banned molecules. Additionally, all import tolerances for banned pesticides should be ended. Meat from animals that have been treated with antibiotics or hormones banned in the EU (growth-promoting antibiotics) should be banned, and meat from animals who have consumed GMO soy clearly labelled.

1.6 RECTIFY MARKET DISTORTIONS OF AND IMPORT DEPENDENCY ON KEY PROTEINS

Given the urgent need to transition towards more plant-rich diets, the EU should cease importing large volumes

of livestock feed to enable the growth or maintenance of its current livestock sector. Higher import duties on soy (which currently enters the EU duty-free) and other meals used in animal feed will allow EU grain farmers to become more competitive, while ideally incentivizing the shrinking of the EU’s livestock herd and shifting towards less-intensive animal agriculture practices (see Figure 3). These changes could be justified under the EU’s adherence to new sustainability frameworks (see Recommendations 1.1 and 1.2), which should consider the GHG impact of products across their entire lifecycle. For example, the externalities of cattle production must be included in any attempts to quantify the footprint of imported soy used to feed it. These changes could also be justified through a European protein plan that prioritises the use of EU-grown feed while reducing the overall size of the EU’s livestock herd (see ‘Recommendation 2.1: Create an EU-wide protein plan to guide the shift towards protein autonomy’).

2. IMPROVE EU PROTEIN AUTONOMY

EU trade policy cannot be adjusted in a vacuum without causing disruption to EU producers and consumers. The EU must also shift agricultural policy to complement and support shifts in trade patterns and regulations, including by reducing livestock numbers and expanding the cultivation of plant proteins for human consumption.

With plant protein growth trending in the right direction (the latest Commission medium-term outlook report 2022-2032 expects areas where soybean and pulses are grown in the EU to expand by 825,000 hectares in the next decade, making the EU nearly self-sufficient in pulses¹¹¹), it will be crucial to ensure that the crops grown are prioritised for human consumption (rather than the current dynamic of food vs. feed competition). This will have the benefit of lowering the EU’s reliance on imported livestock feed, thereby improving food security and the bloc’s ability to weather geopolitical and climate shocks. It will also support farmers to transition towards cultivating plant proteins, enabling them to secure a higher price due to less market distortion from cheap imports aimed at feeding livestock. Ultimately, it will act in service of the EU’s climate goals by reducing the size of the EU’s livestock herd.

2.1 CREATE A COMPREHENSIVE EU PROTEIN PLAN TO GUIDE THE SHIFT TOWARDS PROTEIN AUTONOMY

The Commission should urgently bring forward a comprehensive and binding European Protein Strategy. Such an analysis will be essential to assessing the benefits and trade-offs of policy measures to encourage shifts towards producing more plant protein in Europe for direct human consumption. The EU has made much progress on this topic to date: in 2018, it published a report about plant proteins¹⁰⁴, which was followed by the European Parliament’s 2023 draft report calling for an ambitious, comprehensive EU protein strategy in 2023, which noted that increasing EU protein production could have the combined benefit of reducing imported deforestation and GHG emissions, contributing to food security and human nutrition, and improving environmental outcomes^{25,98}. However, the Commission has yet to produce an EU protein strategy. This should be prioritised in the new 2024-2029 EU legislative period. The plan should be integrated into the existing framework of the Green Deal and Farm to Fork Strategy and include explicit requirements that a certain percentage of animal feed be sourced from within the EU in order to reduce the bloc’s reliance on imports. It should also require the expansion of the cultivation of protein crops.

2.2 ENSURE THE CAP INCENTIVIZES PLANT PROTEIN PRODUCTION FOR HUMAN CONSUMPTION

The introduction of eco-regimes under the new CAP could result in incentives to develop the cultivation of plant proteins¹¹². The recent rollbacks to several of the ‘good agricultural and environmental conditions’ (GAEC) in the CAP must therefore be urgently reversed. Requirements such as crop rotation (GAEC 7) are part and parcel of a wider policy package that would incentivize farmers to grow food for human consumption according to the principles of agroecology. Some studies have already shown a positive link between environmental practices and the competitiveness of farms, especially concerning the more efficient use of inputs¹⁰⁶. GAEC should be accompanied by additional support measures, such as minimum prices in arable farming, guaranteeing that European farmers get stable, cost-effective prices for their crops.

BOX 11: NATIONAL PROTEIN PLANS

Following the European Parliament’s 2018 report on proteins, many EU Member States have taken up the call to improve EU protein autonomy by integrating a focus on plant proteins into their CAP strategic plans¹⁵⁴. The Dutch government released a standalone National Protein Strategy (NES) at the end of 2020¹⁵⁵. The Dutch strategy aims to sustainably increase the degree of protein self-sufficiency in the Netherlands and the EU. It calls for a reduction in imports of protein-rich crops from outside the EU as well as a change in land use towards the cultivation of plant-based proteins, stipulating that 100,000 hectares of land should be used for protein-rich crops by 2030. In addition to increasing the cultivation of certain protein-rich crops, the strategy also focuses on the development of alternative protein sources and a shift from animal to vegetable protein consumption.



Credit: Kampus production/Pexels

CONCLUSION

This report has demonstrated the need to integrate food system sustainability goals into EU agri-trade policy. It notes how current agri-trade policies are at odds with EU sustainability goals in five key areas: the climate crisis, public health, food security and farmers' livelihoods, global equity, and animal welfare. The EU is highly reliant on imports of oilseeds like soy and rapeseed to feed its livestock herd, which is currently far too large to meet urgent climate objectives laid out by the Paris Climate Agreement and the European Green Deal. EU agri-trade policy also perpetuates unfair double standards concerning the export of banned agrochemicals to third countries by EU companies and the import of animal products subject to weaker welfare standards.

By allowing for the import of products implicated in deforestation, pesticide poisonings, and gender inequity, current EU agri-trade policy outsources negative environmental and health impacts of EU consumption onto communities in third countries. It also exposes EU consumers to residues of harmful pesticides and contributes to meat- and dairy-heavy diets that negatively impact the health of the EU's population. Meanwhile, EU farmers, the backbone of the bloc's agricultural sector, face unfair distortions in production costs, making it more difficult to implement vital environmental reform in EU agricultural policy. These issues will only compound if the EU is to ratify the much-criticised EU-Mercosur trade agreement.

With these challenges in mind, this report envisions how policymakers can reconsider the role of EU agri-trade as part of the longer-term vision for sustainable food systems. In this vision, trade would support a resilient food system that prioritises the environment, public health, global equity, farmers' livelihoods, and animal welfare over continually expanding bilateral trade agreements that mainly enrich multinational corporations.

Policymakers should champion ambitious new international standards on trade and sustainability while conducting impact assessments of future and existing trade deals. They should also urgently enact mirror measures to close regulatory loopholes that allow for the import and export of products that do not adhere to EU standards. To reduce the EU's dependence on imports for the livestock sector, they must also work to create an EU-wide protein plan that prioritises the growth of plant proteins for human consumption, and ensure that the CAP incentivises these shifts.

The new 2024-2029 EU legislative period will determine whether the EU continues down the dangerous path of trading as usual, or whether catalytic shifts begin to occur. As the EU approaches the fifth anniversary of the Green Deal without the flagship Farm to Fork Strategy initiatives enacted, the time for the bloc to act decisively is now.

REFERENCES

1. European Commission. *Trade Policy Review — An Open, Sustainable and Assertive Trade Policy*. https://eur-lex.europa.eu/resource.html?uri=cellar:5bf4e9d0-71d2-11eb-9ac9-01aa75ed71a1.0001.02/DOC_1&format=PDF (2021).
2. Feedback EU. *Biomethane from Manure: A Curse, Not a Cure*. https://feedbackeurope.org/wp-content/uploads/2024/10/Report-Biomethane-from-Manure-Oct24_FINAL.pdf (2024).
3. Ibbott, S. 'Green' CAP rollback. *EEB — The European Environmental Bureau* <https://eeb.org/green-cap-rollback-right-as-scientists-warn-about-the-need-for-urgent-and-decisive-action/> (2024).
4. Zimmermann, A. & Rapsomanikis, G. Trade and Sustainable Food Systems. in *Science and Innovations for Food Systems Transformation [Internet]* (Springer, 2023). doi:10.1007/978-3-031-15703-5_36.
5. FAO. *The State of Agricultural Commodity Markets 2022*. (FAO ;, 2022).
6. M. Springmann, H. Kennard, C. Dalin, & F. Freund. International food trade contributes to dietary risks and mortality at global, regional and national levels. *Nature Food* **4**, 886–893 (2023).
7. Rodrik, D. A primer on trade and inequality. *Oxford Open Economics* **3**, i1076–i1082 (2024).
8. Dorn, D. & Levell, P. *Trade and Inequality in Europe and the US*. <https://ifs.org.uk/inequality/trade-and-inequality-in-europe-and-the-us/> (2021).
9. Trade policy and agreements — EU action | European Union. https://european-union.europa.eu/priorities-and-actions/actions-topic/trade_en.
10. European Commission. Report from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on the Implementation and Enforcement of EU Trade Policy. (2024).
11. Faure, G. Monitoring EU agri-food trade. https://agriculture.ec.europa.eu/document/download/b891b544-471a-4fbf-ab9f-d979564b4492_en?filename=monitoring-agri-food-trade_sep2024_en.pdf
12. European Commission. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Strategy for Financing the Transition to a Sustainable Economy. (2021).
13. European Commission. The European Green Deal — Striving to be the first climate-neutral continent. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en.
14. Legislative Observatory- European Parliament. Procedure File: 2022/0269(COD). *Legislative Observatory- European Parliament* [https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2022/0269\(COD\)](https://oeil.secure.europarl.europa.eu/oeil/popups/ficheprocedure.do?lang=en&reference=2022/0269(COD)).
15. *Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the Making Available on the Union Market and the Export from the Union of Certain Commodities and Products Associated with Deforestation and Forest Degradation and Repealing Regulation (EU) No 995/2010. OJ L vol. 150* (2023).
16. Maria Simon Arboleas. EU countries seal relaxation of CAP green requirements until 2027. *Euractiv* (2024).
17. European Commission. Commission strengthens support for EU Deforestation Regulation implementation and proposes extra 12 months of phasing-in time, responding to calls by global partners. *European Commission — European Commission* https://ec.europa.eu/commission/presscorner/detail/en/ip_24_5009 (2024).
18. Ibbott, S. Fast-and-loose: EU passes the fastest CAP reform ever. *EEB — The European Environmental Bureau* <https://eeb.org/fast-and-loose-historic-move-as-eu-rushes-to-remove-environmental-safeguards-in-the-cap-despite-renewed-calls-from-scientists-to-accelerate-climate-action/> (2024).
19. European Commission. Directorate General for Agriculture and Rural Development. *EU Agricultural Outlook 2023-2035*. (Publications Office, LU, 2023).
20. Crippa, M. *et al.* Food systems are responsible for a third of global anthropogenic GHG emissions. *Nat Food* **2**, 198–209 (2021).
21. Buczinski, B., Chotteau, P., Dufлот, B. & Rosa, A. *The EU-Mercosur FreeTrade Agreement, Its Impacts on Agriculture*. https://www.greens-efa.eu/files/assets/docs/mercotur_en_study.pdf (2023).
22. Greenpeace Germany. EU-Mercosur trade deal breaches EU climate laws — legal analysis. (2024).
23. Cunha, L. *et al.* *A Toxic Cocktail: The EU-Mercosur Deal Limes Reveal How European Pesticides Travel around the World (and Back)*. <https://www.greenpeace.org/static/planet4-sweden-stateless/2023/04/23fac49f-study-a-toxic-cocktail-the-eu-mercotur-deal.pdf> (2023).
24. European Commission. Strategic Dialogue on the future of EU agriculture. *European Commission* https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/agriculture-and-green-deal/strategic-dialogue-future-eu-agriculture_en.
25. Wiesner, E. Report European protein strategy. *European Parliament* https://www.europarl.europa.eu/doceo/document/A-9-2023-0281_EN.html (2023).
26. Slow Food Deutschland. *Equal Standards for All Food: Plea for an EU Regulation with Mirror Measures for Imported Products from Third Countries*. (2024).
27. European Commission. The Common Agricultural Policy: an overview | EU CAP Network. https://eu-cap-network.ec.europa.eu/common-agricultural-policy-overview_en.
28. Kuepper, B. & Rijk, G. *Who's Profiting from Brazilian Soy? An Analysis of the Dutch Soy Supply Chain*.
29. Friends of the Earth Netherlands. *Joint NGOs' Contribution to the Fourth Universal Periodic Review of the Netherlands by the UN Human Rights Council*. <https://milieudefensie.nl/actueel/upr-nl-2022-foe-joint-stakeholder-report.pdf> (2022).
30. Ministerie van Landbouw, Natuur en Voedselkwaliteit. *Nationale Eiwitstrategie*. (2020).
31. European Feed Manufacturers' Federation. *Compound-Feed-Production-1989-2019.Pdf*. <https://fefac.eu/wp-content/uploads/2020/08/Compound-Feed-Production-1989-2019.pdf> (2020).
32. NL Times. Netherlands plays key role in exporting banned pesticides: report | NL Times. <https://nltimes.nl/2024/06/13/netherlands-plays-key-role-exporting-banned-pesticides-report> (2024).
33. Grandjean, L. G. and G. V. data visualisation: M. Banned in Europe: How the EU exports pesticides too dangerous for use in Europe. <https://www.publiceye.ch/en/topics/pesticides/banned-in-europe> (2024).
34. Nations, U. The Paris Agreement. *United Nations* <https://www.un.org/en/climatechange/paris-agreement>.
35. Department of Economic and Social Affairs Sustainable Development. Goal 3: Ensure healthy lives and promote well-being for all at all ages. *United Nations* <https://sdgs.un.org/goals/goal3>.
36. European Commission. Farm to Fork Strategy — for a fair, healthy and environmentally-friendly food system. *European Commission* https://food.ec.europa.eu/horizontal-topics/farm-fork-strategy_en.
37. European Commission. Deforestation. https://environment.ec.europa.eu/topics/forests/deforestation_en.
38. Cassidy, E. S., West, P. C., Gerber, J. S. & Foley, J. A. Redefining agricultural yields : from tonnes to people nourished per hectare. (2018) doi:10.1088/1748-9326/8/3/034015.
39. Poore, J. & Nemecek, T. Reducing food's environmental impacts through producers and consumers. **992**, 987–992 (2019).
40. Food and Agriculture Organization of the United Nations FAO. *Livestock Solutions for Climate Change*. <https://www.fao.org/family-farming/detail/en/c/1634679/> (2017).
41. Peyraud, J., MacLeod, M., & Directorate-General for Agriculture and Rural Development. *Future of EU Livestock: How to Contribute to a Sustainable Agricultural Sector?* (Publications Office, LU, 2020).
42. Horizon — The EU Research & Innovation Magazine. Plant-based diets improve health and environment, says top EU scientific advisor. *European Commission* <https://projects.research-and-innovation.ec.europa.eu/en/horizon-magazine/plant-based-diets-improve-health-and-environment-says-top-eu-scientific-advisor> (2023).

43. European Commission. EU agricultural outlook 2021-31: consumer behaviour to influence meat and dairy markets. https://agriculture.ec.europa.eu/news/eu-agricultural-outlook-2021-31-consumer-behaviour-influence-meat-and-dairy-markets-2021-12-09_en (2021).
44. Greenpeace European Unit. EU climate diet: 71% less meat by 2030. *Greenpeace European Unit* <https://www.greenpeace.org/eu-unit/issues/nature-food/2664/eu-climate-diet-71-less-meat-by-2030/> (2020).
45. Henk Westhoek *et al.* Food choices, health and environment: Effects of cutting Europe's meat and dairy intake. *Global Environmental Change* **26**, 196–205 (2014).
46. Oilseeds and protein crops — European Commission. https://agriculture.ec.europa.eu/data-and-analysis/markets/overviews/balance-sheets-sector/oilseeds-and-protein-crops_en (2024).
47. Basnet, S. K., Ghosh, R. K., Eriksson, M. & Lagerkvist, C.-J. The distortion in the EU feed market due to import constraints on genetically modified soy. *Agricultural and Food Economics* **11**, 50 (2023).
48. Friends of the Earth Europe. *Soy Alert: How to Increase the EU's Plant Protein Production in a Sustainable and Agroecological Way?* https://friendsoftheearth.eu/wp-content/uploads/2019/01/soyalert_report_fv_web.pdf.
49. European Commission. Directorate General for Agriculture and Rural Development., Agrosynergie., Areté., Cereopa., AFZ. Study on feeding strategies to diversify protein sources used in different livestock production systems in the EU: final report. [Internet]. LU: Publications Office; 2024 [cited 2024 Oct 10]. Available from: <https://data.europa.eu/doi/10.2762/57517>
50. Kuepper, B. *Impacts of a Shift to Plant Proteins — Effects of Reduced Meat Production on GHG Emissions, Land, and Water Use*. <https://profundo.nl/download/impacts-of-reduced-meat-consumption-2311> (2023).
51. Harwatt, H., Hayek, M. N., Behrens, P. & Ripple, W. J. *Options for a Paris-Compliant Livestock Sector*. (2024).
52. Lóránt, A. & Allen. *Net-Zero Agriculture in 2050: How to Get There*. https://ieep.eu/wp-content/uploads/2022/12/IEEP_NZ2050_Agriculture_report_screen.pdf (2019).
53. Luyckx, K. *Soy No More: Breaking Away from Soy in UK Pig and Poultry Farming*. (2023).
54. Song, X.-P. *et al.* Massive soybean expansion in South America since 2000 and implications for conservation. *Nat Sustain* **4**, 784–792 (2021).
55. UN environmental programme. Megadiverse Brazil: giving biodiversity an online boost. *UN environmental programme* <https://www.unep.org/news-and-stories/story/megadiverse-brazil-giving-biodiversity-online-boost> (2019).
56. Wedeux, B. & Schulmeister-Oldenhove, A. *Stepping Up? The Continuing Impact of EU Consumption on Nature Worldwide* STEPPING UP? THE CONTINUING IMPACT OF EU CONSUMPTION ON NATURE WORLDWIDE. <https://www.wwf.nl/globalassets/pdf/stepping-up-the-continuing-impact-of-eu-consumption-on-nature-worldwide.pdf> (2021).
57. Global Witness. The Cerrado crisis: Brazil's deforestation frontline. *Global Witness* <https://www.globalwitness.org/en/campaigns/forests/the-cerrado-crisis-brazils-deforestation-frontline/>.
58. Earthsight. Fresh evidence of illegal deforestation in European beef and leather imports underscores importance of EU law. <https://www.earthsight.org.uk/news/beef-leather-imports-EUDR>.
59. Laurent Gaberell & Carla Hoinkes. *Highly Hazardous Profits — How Syngenta Makes Billions by Selling Toxic Pesticides*. https://www.publiceye.ch/fileadmin/doc/Pestizide/2019_PublicEye_Highly-hazardous-profits_Report.pdf (2019).
60. National Pesticide Information Center. Bifenthrin Technical Fact Sheet. <http://npic.orst.edu/factsheets/archive/biftech.html>.
61. EcoAmericas. Bee die-offs in Brazil putting spotlight on fipronil. <https://www.ecoamericas.com/issues/article/2021/12/7AD3FE6A-BFD6-4BF8-A389-282B89A63559>.
62. Bonmatin, J.-M. *et al.* Environmental fate and exposure; neonicotinoids and fipronil. *Environ Sci Pollut Res* **22**, 35–67 (2015).
63. Department of Primary Industries and Regional Development. Insecticide spray guides for crops in Western Australia | Agriculture and Food. <https://www.agric.wa.gov.au/insecticides/insecticide-spray-guides-crops-western-australia> (2024).
64. European Commission. EU Pesticides Database — Active substances. <https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/start/screen/active-substances> (2024).
65. European Commission. Neonicotinoids. *European Commission* https://food.ec.europa.eu/plants/pesticides/approval-active-substances-safeners-and-synergists/renewal-approval/neonicotinoids_en.
66. European Parliament. Products made with forced labour to be banned from EU single market. *News — European Parliament* <https://www.europarl.europa.eu/news/en/press-room/20240419IPR20551/products-made-with-forced-labour-to-be-banned-from-eu-single-market> (2024).
67. European Commission. Farm to Fork targets — Progress. *European Commission* https://food.ec.europa.eu/plants/pesticides/sustainable-use-pesticides/farm-fork-targets-progress_en.
68. European Environment Agency. How pesticides impact human health (Signal). <https://www.eea.europa.eu/en/european-zero-pollution-dashboards/indicators/pesticides-impact-on-human-health> (2024).
69. European Human Biomonitoring Initiative. *Substance Report*. (2022).
70. Ki-Hyun, K., Ehsanul, K. & Shamin, A. J. Exposure to pesticides and the associated human health effects. *The Science of the total environment* **575**, (2017).
71. European Commission. Attitudes of Europeans towards the environment. <https://europa.eu/eurobarometer/surveys/detail/3173> (2024).
72. European Commission. EU Pesticides Database — MRLs — Pesticide residue(s) and maximum residue levels (mg/kg). *European Commission* https://ec.europa.eu/food/plant/pesticides/eu-pesticides-database/start/screen/mrls/details?%20lg_code=EN&pest_res_id_list=120&product_id_list=.
73. EFSA (European Food Safety Authority). Setting of an import tolerance for glyphosate in soyabeans. *EFSA Journal* **19**, e06880 (2021).
74. Jia, Q. *et al.* Pesticide residues in animal-derived food: Current state and perspectives. *Food Chemistry* **438**, 137974 (2024).
75. Tongo, I. & Ezemonye, L. Human health risks associated with residual pesticide levels in edible tissues of slaughtered cattle in Benin City, Southern Nigeria. *Toxicology Reports* **2**, 1117 (2015).
76. Saskatchewan Ministry of Agriculture. *2024 Guide to Crop Protection — For the Chemical Management of Weeds, Plant Diseases and Insects*. <https://www.saskatchewan.ca/business/agriculture-natural-resources-and-industry/agribusiness-farmers-and-ranchers/crops-and-irrigation/crop-guides-and-publications/guide-to-crop-protection> (2024).
77. SFM. Europe to Ban Pre-Harvest Glyphosate on Crops — so should Canada. *Safe Food Matters* <https://safefoodmatters.org/2023/11/17/europe-to-ban-pre-harvest-glyphosate-on-crops-so-should-canada/> (2023).
78. Lang, S. Feed: soy, forest, and savanna. *Heinrich Böll Stiftung — Brussels — European Union* <https://eu.boell.org/en/2021/09/07/feed-soy-forest-and-savanna> (2021).
79. European Commission. Traceability and labelling. https://food.ec.europa.eu/plants/genetically-modified-organisms/traceability-and-labelling_en.
80. Inf'OGM. GMO & labeling in European Union. <https://infogm.org/en/etiquetage-3/>.
81. IARC. IARC Monograph on Glyphosate. *International Agency for Research on Cancer — WHO* <https://www.iarc.who.int/featured-news/media-centre-iarc-news-glyphosate> (2018).
82. Böhn, T. & Millstone, E. The Introduction of Thousands of Tonnes of Glyphosate in the food Chain — An Evaluation of Glyphosate Tolerant Soybeans. *Foods* **8**, (2019).

83. European Commission. Ban on antibiotics as growth promoters in animal feed enters into effect. *European Commission — European Commission* https://ec.europa.eu/commission/presscorner/detail/en/ip_05_1687 (2005).
84. Dupré, M., Kpenou, S. & Colli, M. *A quand la fin des importations de viandes issues d'animaux dopés aux antibiotiques activateurs de croissance? — Enquête sur l'absence de mise en œuvre d'une mesure miroir essentielle pour la santé.* <https://www.veblen-institute.org/A-quand-la-fin-des-importations-de-viandes-issues-d-animaux-dopes-aux.html> (2024).
85. Kpenou, S. Antibiotiques activateurs de croissance : une mesure miroir toujours non opérationnelle. <https://www.veblen-institute.org/Antibiotiques-activateurs-de-croissance-une-mesure-miroir-toujours-non.html>.
86. Greenpeace European Unit. Report: Toxic Double Standards in EU trade. *Greenpeace European Unit* <https://www.greenpeace.org/eu-unit/issues/democracy-europe/47171/report-toxic-double-standards-in-eu-trade/> (2024).
87. IARC. IARC Monographs evaluate consumption of red meat and processed meat. (2015).
88. Gu, X. *et al.* Red meat intake and risk of type 2 diabetes in a prospective cohort study of United States females and males. *The American Journal of Clinical Nutrition* **118**, 1153–1163 (2023).
89. Papier, K., Knuppel, A., Syam, N., Jebb, S. A. & Key, T. J. Meat consumption and risk of ischemic heart disease: A systematic review and meta-analysis. *Critical Reviews in Food Science and Nutrition* **63**, 426–437 (2023).
90. Directorate-General for Research and Innovation (European Commission) & Group of Chief Scientific Advisors (European Commission). *Towards Sustainable Food Consumption: Promoting Healthy, Affordable and Sustainable Food Consumption Choices.* (Publications Office of the European Union, 2023).
91. Science, D. of F. Most Europeans are reducing their meat consumption, EU-funded survey finds. <https://food.ku.dk/english/news/2023/most-europeans-are-reducing-their-meat-consumption-eu-funded-survey-finds/> (2024).
92. Lighthouse. Big Meat. *Lighthouse Reports* <https://www.lighthousereports.com/investigation/big-meat-fat-subsidies-thin-taxes/> (2022).
93. Samuel, S. It's not just Big Oil. Big Meat also spends millions to crush good climate policy. *Vox* <https://www.vox.com/future-perfect/22379909/big-meat-companies-spend-millions-lobbying-climate> (2021).
94. Sherrington, R., Carlile, C. & Healy, H. Big meat and dairy lobbyists turn out in record numbers at Cop28. *The Guardian* (2023).
95. Eräjää, S. *Marketing Meat — How EU Promotional Funds Favour Meat and Dairy.* <https://www.greenpeace.org/static/planet4-eu-unit-stateless/2021/04/20210408-Greenpeace-report-Marketing-Meat.pdf> (2021).
96. Ian Quinn. Meat industry lobbying behind cultured meat bans, claims investigation. *The Grocer* <https://www.thegrocer.co.uk/news/meat-industry-lobbying-behind-cultured-meat-bans-claims-investigation/693849.article> (2020).
97. InfluenceMap. The European Meat and Dairy Sector's Climate Policy Engagement. <https://influencemap.org/report/The-European-Meat-and-Dairy-Sector-s-Climate-Policy-Engagement-28096>.
98. European Parliamentary Research Service. *EU Protein Strategy.* [https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/751426/EPRS_BRI\(2023\)751426_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/751426/EPRS_BRI(2023)751426_EN.pdf) (2023).
99. European Commission. Reducing the plant protein deficit of the European Union — European Commission. https://agriculture.ec.europa.eu/news/reducing-plant-protein-deficit-european-union-2024-10-08_en (2022).
100. Foote, N. Member states call for unified EU plant protein strategy. *Euractiv* (2022).
101. O'Carroll, L. EU to impose tariff of up to 50% on Russia grain imports. *The Guardian* (2024).
102. EU feed autonomy: Closing the gaps in European food security | Think Tank | European Parliament. [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2023\)739328](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2023)739328).
103. Associated Press. Argentina's Milei renews vow to scrap export taxes as country's powerful farmers get impatient. *Voice of America* <https://www.voanews.com/a/argentina-s-milei-renews-vow-to-scrap-export-taxes-as-country-s-powerful-farmers-get-impatient-/7716264.html> (2024).
104. European Commission. Report from the Commission to the Council and the European Parliament on the development of plant proteins in the European Union. <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX%3A52018DC0757> (2018).
105. Greenpeace European Unit. *Feeding The Problem — The Dangerous Intensification of Animal Farming in Europe.* <https://www.greenpeace.org/static/planet4-eu-unit-stateless/2019/02/83254ee1-190212-feeding-the-problem-dangerous-intensification-of-animal-farming-in-europe.pdf> (2019).
106. Beck, M. *et al.* *Rural Areas — Levels of Support and Impact on Competitiveness of Farms.* [https://www.europarl.europa.eu/RegData/etudes/STUD/2024/747270/IPOL_STU\(2024\)747270_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2024/747270/IPOL_STU(2024)747270_EN.pdf).
107. Greenpeace European Unit. Majority of European crops feeding animals and cars, not people. *Greenpeace European Unit* <https://www.greenpeace.org/eu-unit/issues/nature-food/45159/majority-of-european-crops-feeding-animals-and-cars-not-people/> (2020).
108. Cassidy, E. S., West, P. C., Gerber, J. S. & Foley, J. A. Redefining agricultural yields: From tonnes to people nourished per hectare. *Environmental Research Letters* **8**, (2013).
109. Berners-Lee, M., Kennelly, C., Watson, R. & Hewitt, C. N. Current global food production is sufficient to meet human nutritional needs in 2050 provided there is radical societal adaptation. *Elementa* (2018) doi:10.1525/elementa.310.
110. Pörtner, L. M. *et al.* We need a food system transformation — in the face of the Ukraine war, now more than ever. (2022) doi:10.5281/ZENODO.6371849.
111. European Commission. Medium-term — A medium-term outlook on the prospects for agricultural markets and income. *European Commission* https://agriculture.ec.europa.eu/data-and-analysis/markets/outlook/medium-term_en (2024).
112. ARC. Impact of CAP Beyond the EU — A Closer Look on Soya Imports and Milk Product Exports. *Agricultural and Rural Convention* <https://www.arc2020.eu/impact-of-cap-beyond-the-eu/> (2023).
113. Manzanaro, S. S. NGOs unite against EU's rollback of green policies for the agrifood sector. *Euractiv* (2024).
114. European Commission. *Brief 1: CAP Specific Initiatives Explained — Ensuring Viable Farm Income.* https://agriculture.ec.europa.eu/system/files/2021-01/cap_specific_objectives_-_brief_1_-_ensuring_viable_farm_income_0.pdf (2018).
115. European Commission. EU farms: 5.3 million fewer in 2020 than in 2005. <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20230403-2> (2023).
116. Marco Contiero. Farmers are right to protest — but Green Deal is wrong target. *Greenpeace European Unit* <https://www.greenpeace.org/eu-unit/issues/nature-food/46990/farmers-are-right-to-protest-but-green-deal-is-wrong-target/> (2024).
117. Eurostat. Most of the 9.1 million farms in the EU are family-run. *Eurostat* <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/ddn-20231024-2> (2023).
118. Allianz Research. *What to Watch: European Farmers Unite in Unrest, Industrial Policy Déjà vu in Brazil and ECOWAS Put to the Test.* (2024).
119. Gustavo Naumann, Carmelo Cammalleri, Lorenzo Mentaschi, & Luc Feyen. Increased economic drought impacts in Europe with anthropogenic warming. *Nature Climate Change* **11**, 485–491 (2021).
120. Al Jazeera. Photos: Angry Polish farmers protest against EU rules, Ukraine farm imports. *Al Jazeera* <https://www.aljazeera.com/gallery/2024/3/7/angry-polish-farmers-protest-eu-rules-ukraine-farm-imports> (2024).

121. European Federation of Food, Agriculture and Tourism Trade Unions. European Agro-Food Workers Unions and Farming Sector Strongly Reject the Conclusion of the Mercosur Trade Agreement. *EFFAT — European Federation of Food, Agriculture and Tourism Trade Unions* <https://effat.org/in-the-spotlight/european-agro-food-workers-unions-and-farming-sector-strongly-reject-the-conclusion-of-the-mercotur-trade-agreement/> (2024).
122. Institut Veblen. *Pour La Mise En Place De Mesures Miroirs: Cas D'Étude — La Viande Bovine.* (2023).
123. Hostiou, N., Vollet, D., Benoit, M. & Delfosse, C. Employment and farmers' work in European ruminant livestock farms: A review. *Journal of Rural Studies* **74**, 223–234 (2020).
124. McSweeney, E. & Young, H. 'The whole system is rotten': life inside Europe's meat industry. *The Guardian* (2021).
125. Friends of the Earth Europe & Food & Water Action Europe. *The Urgent Case to Stop Factory Farms in Europe.* https://www.foodandwatereurope.org/wp-content/uploads/2020/10/Factoryfarms_110920_web.pdf (2020).
126. Friends of the Earth Europe. *Toxic Trading: The EU Pesticide Lobby's Offensive in Brazil.* <https://friendsoftheearth.eu/wp-content/uploads/2022/04/Toxic-Trading-EN.pdf> (2022).
127. Bombardi, L. M. *Geography of Asymmetry: The Vicious Cycle of Pesticides and Colonialism in the Commercial Relationship between Mercosur and the European Union.* <https://ocaa.org.br/en/publicacao/geography-of-asymmetry-the-vicious-cycle-of-pesticides-and-colonialism-in-the-commercial-relationship-between-mercotur-and-the-european-union/> (2021).
128. Mendes, M. Molecular Colonialism. *Anthropocene Curriculum* <https://www.anthropocene-curriculum.org/contribution/molecular-colonialism> (2017).
129. Panis, C. *et al.* Evidence on Human Exposure to Pesticides and the Occurrence of Health Hazards in the Brazilian Population: A Systematic Review. *Front Public Health* **9**, 787438 (2022).
130. Gabay, A. Poisoned by pesticides: Health crisis deepens in Brazil's Indigenous communities. *Mongabay Environmental News* <https://news.mongabay.com/2023/01/poisoned-by-pesticides-health-crisis-deepens-in-brazils-indigenous-communities/> (2023).
131. Soy grown illegally on Brazil's tribal lands finds its way to global markets. *Reuters* (2024).
132. Direitos, T. de. Study shows that Cargill port has been operating in Itaituba (Pará) for 10 years irregularly. <http://terradedireitos.org.br/en/news/news/study-shows-that-cargill-port-has-been-operating-in-itaituba-para-for-10-years-irregularly/23865>.
133. Bjorhus, J. Cargill's bid to open new port in Brazil opposed by human rights, conservation groups. *The Minnesota Star Tribune* <https://www.startribune.com/cargills-bid-to-open-new-port-in-brazil-opposed-by-human-rights-conservation-groups/600177539> (2022).
134. Government of France. National strategy to combat imported deforestation. *Stratégie nationale de lutte contre la déforestation importée* <https://www.deforestationimportee.ecologie.gouv.fr/en/affected-products/article/soy> (2024).
135. Proforest, Good Growth Partnership, WWF & gef. *Addressing Gender Considerations in the Soy Supply Chain: Tackling Gender Inequality through Responsible Sourcing.* https://static1.squarespace.com/static/5b48c2572487fd71f29d1c/t/611b9718bfa285676b17911a/1629198105630/ENG_Gender_DisP_V1.2_16Aug21.pdf (2021).
136. United Nations Convention to Combat Desertification. *Differentiated Impacts of Desertification, Land Degradation and Drought on Women and Men.* https://www.unccd.int/sites/default/files/2022-05/SDM_ENGLISH_webfile.pdf (2022).
137. Global Forest Coalition. *A Gendered Perspective of the Proposed EU Regulation on Deforestation-Free Products.* https://www.fern.org/fileadmin/uploads/fern/Documents/2022/EN_A_Gendered_Perspective_on_Deforestation_Regulation.pdf (2022).
138. Ilang-Ilang Quijano. Gender: at the forefront of the exposure. *Heinrich Böll Stiftung | Brussels office — European Union* <https://eu.boell.org/en/PesticideAtlas-gender> (2022).
139. FAO. *Addressing Gender Issues in Pesticide Management.* <https://openknowledge.fao.org/server/api/core/bitstreams/f03270a3-b26c-4474-8451-0ce25ba0d733/content> (2022).
140. Canola Watch. Pre-harvest products for use in canola. *Canola Watch* <https://www.canolacouncil.org/canola-watch/2018/08/01/pre-harvest-products-for-use-in-canola-3/> (2018).
141. Panis, C. *et al.* Exposure to Pesticides and Breast Cancer in an Agricultural Region in Brazil. *Environ. Sci. Technol.* **58**, 10470–10481 (2024).
142. Eurogroup For Animals. *50 NGOs Call on the European Commission to Stop the Promotion of Meat and Dairy.* https://www.ciwf.eu/media/7446925/50-ngos-call-on-the-european-commission-to-stop-the-promotion-of-meat-and-dairy.pdf?utm_campaign=factoryfarming&utm_source=twitter&utm_medium=ciwf (2021).
143. Directorate-General for Agriculture and Rural Development. Meat products short-term outlook. https://agridata.ec.europa.eu/extensions/DashboardSTO/STO_Meat.html.
144. Meat and Livestock Australia. *EU Market Snapshot.* https://www.mla.com.au/contentassets/a8396b0b1b064e6380ed5dbcf1008355/eu_2023-mla-mi-market-snapshot_290124.pdf (2023).
145. Dahm, J. Stricter animal welfare rules should apply to imports, EU ministers say. *www.euractiv.com* <https://www.euractiv.com/section/agriculture-food/news/stricter-animal-welfare-rules-should-apply-to-imports-eu-ministers-say/> (2022).
146. Euro Group for Animals. Most animal welfare rules do not apply to imported products | Eurogroup for Animals. <https://www.eurogroupforanimals.org/what-we-do/areas-of-concern/most-animal-welfare-rules-do-not-apply-imported-products> (2023).
147. Euro Group For Animals. *Analysis of Animal Welfare Standards for Animal Products Imported to the EU.* https://www.eurogroupforanimals.org/files/eurogroupforanimals/2023-02/2023_EfA_Analysis%20of%20animal%20welfare%20standards%20for%20imported%20products.pdf (2023).
148. Stop cruel imports! Applying EU animal welfare standards to all products placed on the EU market | Eurogroup for Animals. <https://www.eurogroupforanimals.org/library/stop-cruel-imports-applying-eu-animal-welfare-standards-all-products-placed-eu-market> (2023).
149. World Trade Organization. WTO rules and environmental policies: GATT exceptions. https://www.wto.org/english/tratop_e/envt_e/envt_rules_exceptions_e.htm.
150. Clay, J. Opinion: How a Codex Planetarius can account for the true cost of food. *Devex* <https://www.devex.com/news/sponsored/opinion-how-a-codex-planetarius-can-account-for-the-true-cost-of-food-108460> (2024).
151. Codex Planetarius. Codex Planetarius: To Reduce the Environmental Impacts of Food Production. <https://codexplanetarius.org/>.
152. Blot, E. *Reflections on the New Approach to the TSD Chapters for Greener Trade — A Rapid Review of the New Approach and Stakeholders' Positions.* https://ieep.eu/wp-content/uploads/2023/02/Reflections-on-the-new-approach-to-the-TSD-Chapters-for-greener-trade_IEEP-2023-1.pdf (2023).
153. Feedback EU. Spiegel spiegel aan de wand, zijn mirror measures goed voor iedereen? *FeedbackEU* <https://feedbackeuropa.nl/spiegel-spiegel-aan-de-wand-zijn-mirror-measures-goed-voor-iedereen/> (2024).
154. European Commission. *CAP Strategic Plans and Protein Crops.* (2024).
155. Ministerie van Landbouw, N. en V. Letter to Parliament on further elaboration of National Protein Strategy. <https://www.rijksoverheid.nl/documenten/kamerstukken/2022/06/03/nationale-eiwit-strategie> (2022).
156. Gijs, C. EU's trade war nightmare gets real as Trump triumphs. *Politico* (2024).
157. Convention on Biological Diversity. COP15: Nations Adopt Four Goals, 23 Targets for 2030 In Landmark UN Biodiversity Agreement. *Convention on Biological Diversity* <https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022>.

Feedback EU regenerates nature by transforming the food system. To do this we challenge power, catalyse action and empower people to achieve positive change.

All reasonable attempts have been made to verify the nature and status of the primary and secondary sources collected here in good faith and in the public interest. Any opinions expressed are honestly held and based on facts true at the time of publication.

Published November 2024

Author: Isabela Bonnevera

Further research & editing: Frank Mechielsen, Julianne van Pelt, Natasha Hurley, Maximillian Herzog, Jean-François Garnier

Cover illustration: Imke Chatrou

Design: Garth Stewart

Suggested citation: Feedback EU, 2024. *Trading Away the Future? How the EU's agri-trade policy is at odds with sustainability goals.*
The Hague: Feedback EU.

www.feedbackeurope.org
@feedback_europe

Registered as charity with ANBI status in the Netherlands
KvK number: 83634096

