



fighting heart disease
and stroke
european heart network

Feedback to the EU consultation on the CAP Strategic Plans

August 2018

The European Heart Network (EHN) welcomes that the proposed regulation on the CAP Strategic Plans (2018/0216 (COD)) acknowledges that it "... is well known that consumption patterns have an influence on public health. Via its link to food and sometimes also the way food is produced, agricultural policies are linked to health policies..." EHN also welcomes that one of the proposal's nine specific objectives is dedicated to "Improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, as well as animal welfare."

Our concern is about the proposal's ability to deliver this specific objective in a meaningful way. Concerns include:

- the objective is very broadly formulated; in our view, the impact and result indicators (Annex I) do not sufficiently reflect the stated objective. For example, impact indicators on consumer demand and use of antibiotics and pesticides do not include the societal need for the CAP to align with health priorities and population guidelines on nutrition/food
- a structure, where the vast majority of financing is allocated to direct payments, does not seem to allow adequate flexibility for the Member States to achieve the CAP's objectives, notably in terms of health
- there do not seem to be clear accountability mechanisms linking the implementation of the CAP Strategic Plans to subsidies/financial allocations
- the proposal provides no new, or expanded, instruments to achieve the aim to make "nutritious valuable products such as fruit and vegetables easily available for EU citizens", as included in the Commission Communication *The Future of Food and Farming*. No indicator on fruit and vegetables has been proposed, which is inconsistent with the need to transition towards more sustainable and healthy – i.e. more plant-based – diets.

One way of addressing our concerns is to involve stakeholders, including health organisations, at national and EU levels in developing the Strategic Plans to ensure that the CAP will effectively contribute to health-promoting, sustainable food systems.