

RIVISTA QUADRIMESTRALE
DI
DIRITTO DELL'AMBIENTE

NUMERO 1 - 2021

FILIPPO VENTURI

*The Farm to Fork Strategy. A Comprehensive but Cautious Approach to
“Multidimensional” Food Sustainability*



G. Giappichelli editore

ISSN 2239-964X

FILIPPO VENTURI*

The Farm to Fork Strategy. A Comprehensive but Cautious Approach to “Multidimensional” Food Sustainability

TABLE OF CONTENTS: 1. *Introduction*. - 2. *From one Macro-Objective to several Sub-Objectives: an Integrated and Progressive Approach to a “Multidimensional” Food Sustainability*. - 3. *Regulatory Instruments: The Reformist Legal Approach of the Commission and the Need for a Collective Effort*. - 4. *Continuity and Change: the F2F Strategy in the Evolution of Agriculture and Food Law*. - 5. *The F2F Strategy as a Social Regulation Agenda*. 6. *The F2F Strategy’s Possible Shortcomings*. - 7. *Concluding remarks*.

1. *Introduction*

In May 2020, during the first wave of the pandemic emergency, the European Commission has presented a new “Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system”¹. Such Strategy is part of the Green Deal project launched in December 2019 as one of the first and defining initiatives of the newly appointed von der Leyen Commission². Within the context of the Green Deal, the Strategy aims at addressing «the challenges of sustainable food systems and recognises the inextricable links between healthy people, healthy societies and a healthy planet».

This article takes seriously the ambitions of the Farm to Fork Strategy (from now on, the F2F Strategy) and discusses the following questions: which are its objectives and instruments? How does it relate to previous evolutions of EU agriculture and food law? What is its overall rationale? And which are the institutional and substantive causes of its (possible) flaws?

In order to answer such questions, the article will first describe the objectives of the F2F strategy (§ 2) and the regulatory instruments proposed to achieve these objectives (§ 3); then, it will discuss the pattern of continuity and

* Ph.D. candidate in Law, Sant'Anna School of Advanced Studies, Pisa, Italy. Email: filippo.venturi@santannapisa.it.

¹ COM (2020) 381 final.

² COM (2019) 640 final. For an analysis (also) of the acts following the Green Deal, see G. SEVERINI-U. BARELLI, *Gli atti fondamentali dell'Unione europea su “transizione ecologica” e “ripresa e resilienza”*: prime osservazioni, in *Riv. giur. ambiente online*, 20, April 2021.

change between the F2F strategy and EU agriculture and food law (§ 4) and will highlight its fundamental rationale (§ 5); finally, it will provide a critical discussion of some possible flaws of the F2F strategy (§ 6).

2. From one Macro-Objective to several Sub-Objectives: an Integrated and Progressive Approach to a “Multidimensional” Food Sustainability

The F2F Strategy is mainly a regulatory agenda, *i.e.* a list of objectives³ characterized by a comprehensive and integrated approach⁴. Indeed, first, it identifies one ambitious macro-objective and then, in a progressively more specific way, several sub-objectives. These sub-objectives ultimately represent the actual changes of the different stages of the food supply chain (and of its context) that are necessary to achieve that comprehensive macro-objective.

The Strategy's macro-objective is the «transition to sustainable food systems». The concept of food sustainability is nevertheless left undefined by the Commission⁵. However, a careful reading of the entire text of the Communication reveals that it has a “multidimensional”⁶ meaning. Indeed, the Commission builds its understanding of food sustainability on three fundamental (and potentially conflicting⁷) social values: i) food security⁸, ii) food safety (and health)⁹, and iii) environmental protection. According to the Commission, pursuing food sustainability requires trying to achieve these three

³ H. SCHEBESTA-J. L. CHANDEL, *Game-changing potential of the EU's Farm to Fork Strategy*, in *Nature Food*, 2020, p. 586.

⁴ The nexus between agriculture, food, nature and climate (also in the field of public policies and also in the context of the F2F Strategy) is well described by M. ALABRESE, *Politiche climatiche, politiche agricole e il bisogno di coordinamento*, in *Riv. dir. agr.*, 2020, 3, pp. 636 ff.

⁵ H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 586 critically say that «the concept remains rather ill-defined in the F2F Strategy, appearing as a panacea without clear conceptual boundaries». According to them, the ambiguity of the concept creates the risk of “policy incoherencies”.

⁶ This adjective is used by H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 586.

⁷ Again ID., *ibidem*.

⁸ For a well-known definition of food security see FAO, Rome Declaration on World Food Security and World Food Summit Plan of Action, 13-17 November 1996, Rome. In this document, it is stated that «food security, at the individual, household, national, regional and global levels [is achieved] when all people, at all times, have physical and economic access to sufficient, safe and nutritious food to meet their dietary needs and food preferences for an active and healthy life».

⁹ The concept of food safety is instead related to the quality of food. For a narrow definition of this notion, see article 14 of the Regulation n. 178/2002: «1. Food shall not be placed on the market if it is unsafe. 2. Food shall be deemed to be unsafe if it is considered to be: (a) injurious to health; (b) unfit for human consumption».

social values in all the stages of the food process: as it explicitly points out, there are strong «interrelations between our health, ecosystems, supply chains, consumption patterns and planetary boundaries»¹⁰.

This ambitious macro-objective is then progressively articulated in several sub-objectives, having a wider or more narrow scope. In other terms, the Strategy moves from the macro-objective through “intermediate” sub-objectives to specific sub-objectives. In this way, the Commission tries to articulate gradually and comprehensively the paths that should be followed to achieve a “multidimensional” food sustainability. Only after having listed the specific sub-objectives, it can identify the corresponding concrete regulatory actions that should be taken to realize its ambitious macro-objective.

As anticipated, the many specific sub-objectives¹¹ are placed by the Commission in four main policy areas, which, in turn, represent the four “intermediate” sub-objectives of the Strategy¹². These are: i) sustainable food production, ii) sustainable food processing and distribution, iii) sustainable food consumption, and iv) food loss and waste prevention¹³.

These four “intermediate” objectives clarify the approach of the Commission to the challenge of a “multidimensional” food sustainability: it is an integrated and comprehensive approach that steers the entire food process, from the producer (“farm”) to the consumer (“fork”) by way of the food

¹⁰ These words recall the concept of “food integrity”, on which G. STEIER, *Food Integrity and the Food System From a Switchboard Perspective*, in *RQDA*, 2019, 1, p. 92.

¹¹ There are 21 specific sub-objectives. However, the distinction between regulatory objectives and regulatory instruments is not always clear in the text of the F2F Strategy. Therefore, this estimate has room for error. However, quantitative accuracy is not fundamental in this legal analysis.

¹² As correctly observed by A. MASSOT MARTI, *Research for Agri Committee, The Farm to Fork Strategy implications for agriculture and the CAP*, European Parliament Policy Department for Structural and Cohesion Policies, Brussels, May 2020, p. 10.

¹³ There is also another peculiar field of legal action identified by the European Commission: that of global and international initiatives. The Commission wants the EU to be the leader of the «global transition to sustainable agri-food systems», mainly through «international cooperation and trade policy». However, this part of the F2F Strategy will not be analysed because it would broaden too much the scope of this paper: indeed, it could not be well understood without a thorough study of the global food and environmental legal regimes with which the Strategy should interact.

processing actors (industry)¹⁴, towards the values of food security, food safety and environmental protection.

The analysis of the specific sub-objectives confirms the integrated approach of the F2F Strategy. It may be useful to give few examples from each policy area. In the area of sustainable food production, the Commission is committed to promoting a circular bio-based economy, reducing the use of hazardous pesticides (by 50% by 2030) and fertilizers (by 20% by 2030) and supporting the algae industry. In the area of sustainable food processing and distribution, the Commission states instead that sustainable production methods and circular business models in food processing and retail should be encouraged. In the area of sustainable food consumption, the Commission wants to realize the transition to a more plant-based diet with less red and processed meat (to tackle obesity and other “ordinary” diseases). Lastly, in the area of food loss and waste prevention, the Commission wants to propose legally binding targets to reduce food waste. In fact, there is also another sub-objective that is presented as “autonomous” and that is worth mentioning for its importance, *i.e.* the development of a contingency plan for ensuring food supply and food security in times of crisis.

These few examples reveal the strategic rationale of the Commission. To achieve a “multidimensional” food sustainability, a huge transformation is needed, a transformation that should affect all the actors involved in the food supply chain. For this reason, the macro-objective of the Strategy is articulated in specific sub-objectives concerning food production, food processing and food consumption (which can determine food loss and waste): farms need to change, industries need to change, consumers need to change. Ultimately, these sub-objectives specify in which ways the different stages of the food supply chain should change to achieve a “multidimensional” food sustainability.

This integrated and comprehensive approach is due to the Commission’s ambitious “multidimensional” understanding of food sustainability. Indeed, if food sustainability had meant (as it does, for example, in the Report of June 2020 by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security) only the guarantee of

¹⁴ This holistic approach was anticipated (on the control side) by the Regulation n. 625/2017. See F. ALBISINNI, *Regulation (EU) 2017/625: Official Controls, Life, Responsibilities, and Globalization*, in *European Food and Feed Law Review*, 2019, pp. 118 ff.

“intergenerational” food security¹⁵, then the F2F Strategy would have been much simpler and shorter. However, because the Commission is inspired by the values of food safety, food security and environmental protection at the same time, then the Strategy needs to set several specific objectives concerning the entire food supply chain.

The few specific sub-objectives recalled, however, are also useful to stress another important point. Indeed, some of them (*e.g.* the promotion of the algae industry) seem expressions of the idea that the Strategy should also «offer economic gains» to European citizens. In fact, the Commission goes even beyond (a “multidimensional” understanding of) food sustainability when it explicitly points out that the «shift to a sustainable food system can bring environmental, health and social benefits, offer economic gains and ensure that the recovery from the crisis puts us onto a sustainable path». The idea is that the transition «to a sustainable food system» should be “just”, thus taking a social justice perspective, and should represent «a huge economic opportunity», especially in the aftermath of the COVID-19 pandemic and the subsequent economic downturn. By saying that, the Commission seems to design the F2F Strategy as an initiative aimed not only at achieving environment- and food-related results but also at fostering the economic, social and political recovery of the European integration process. However, even from the few examples given one can say that, while the economic growth paradigm is somehow implicit in the underlying rationale of the F2F Strategy, the social justice spirit is instead underdeveloped and, ultimately, rhetorical. But we will come back later to this consideration.

As argued, by listing the specific sub-objectives, the Commission approaches the identification of the corresponding concrete regulatory actions required to realize the transition. In fact, in the Strategy, there is also a part called “Enabling the transition”. It contains other specific sub-objectives that are instrumental to the achievement of the goals of other policy areas¹⁶. These “instrumental” sub-objectives could be placed in a fifth residual policy area,

¹⁵ High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, 15th Report, Food security and nutrition. Building a global narrative towards 2030, June 2020.

¹⁶ Actually, one could also consider them regulatory instruments. However, the legislative initiatives through which they will be realized are not always clarified in the main text of the Communication. Therefore, it is better to consider them as “instrumental” sub-objectives.

that of protection of R&I (research and innovation) on and knowledge sharing about sustainable food systems. In this part of the Strategy, the Commission proposes, for example, to increase funds for R&I on food and environmental issues, to take (more) actions against food fraud along the food supply chain, to enhance the common European agriculture data space with specific attention to sustainability, and so on. These “instrumental” sub-objectives thus identify the changes of “context” necessary to the realization of the specific sub-objectives concerning the transition of the food system. In this perspective, they confirm the complexity of the F2F Strategy, which adopts an integrated and comprehensive approach that considers not only “internal” aspects of the food supply chain, but also factors (such as R&I, data sharing, frauds) that are “external” to (but impacting on) it.

3. Regulatory Instruments: The Reformist Legal Approach of the Commission and the Need for a Collective Effort

As said before, the F2F strategy is mainly a list of regulatory objectives. However, it is not only that. Indeed, the Commission also points to several regulatory instruments that could be used to achieve (some of)¹⁷ these objectives. These regulatory actions are presented in the Annex to the Communication¹⁸, which provides a list of 27 regulatory measures, divided into the four main policy areas of the Strategy and accompanied by the indication of the year in which they will be probably implemented (between 2021 and 2024). In fact, there are also two cross-cutting initiatives that are worth mentioning for their importance: the «proposal for a legislative framework for sustainable food systems» and the development of a «contingency plan for ensuring food supply and food security in times of crisis».

It is interesting to point to two aspects of the Annex's regulatory actions: how they relate to the existing EU regulatory framework and their “autonomy” from or “dependence” on other social and institutional actors. The overall impression is that the Commission shows a reformist legal attitude and that it is aware of the need for a collective implementing effort, which should also involve Member States, businesses and citizens.

¹⁷ As H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 587 point out, «many of the strategy's promises are not translated into action points».

¹⁸ Draft Action Plan of the Farm to Fork Strategy, Annex to COM/2020/381.

Indeed, from the first point of view, the types of regulatory actions that the Commission proposes to realize the objectives of the F2F Strategy are three: i) the revision of the existing regulatory framework (regulation, directives, etc.), ii) the proposal of new regulatory instruments, iii) the use of the Common Agricultural Policy (from now on, CAP) and, in particular, the direction and control of draft CAP Strategic Plans of Member States¹⁹.

The first type of initiatives is more frequent and, in a certain sense, specific: indeed, one may from now foresee their content by considering the existing legal rules that will be reformed (even if a certain vagueness is inevitable). For example, knowing the specific sub-objectives of the Strategy (reduction of the use of chemical pesticides by 50% by 2030), one can already predict in which way the Sustainable Use of Pesticides Directive will be reviewed. The second type of measures, slightly less frequent, tends to be more generic: for example, the (fundamental) initiative to create a legislative framework for sustainable food systems is so generic that one cannot foresee its contents²⁰, but the same could be said also for other innovative regulatory measures (e.g. the «legislative initiatives to enhance cooperation of primary producers to support their position in the food chain»). The third type of action is instead recalled only once, but it has great importance for all the objectives of the Strategy because it represents the way in which the Commission will try to steer Member States' agricultural policies through the targeted use of a third of the EU's total budget and the coordination of the functioning of national administrations²¹.

As anticipated, a balanced reformist approach emerges: the Commission wants to exploit the existing legal framework, refining it and not demolishing it. Indeed, also the innovative regulatory actions have a limited sectorial scope (except for the «proposal for a legislative framework for sustainable food systems», which may have a broader impact). In this perspective, there is no doubt that a lot will change (hopefully for the better), but there does not seem to be any intention to overthrow the existing regulatory paradigm. The impression

¹⁹ For a further analysis of the F2F Strategy's Annex and its relationships with the CAP, see A. MASSOT MARTI, *op. cit.*, pp. 18-20.

²⁰ As noted by H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 587.

²¹ See S. CASSESE (ed.), *La nuova costituzione economica*, VI ed., Bari, Laterza, 2021, p. 99 and A. MASSOT MARTI, *op. cit.*, p. 13.

is that the F2F Strategy is an evolution (rather than a revolution) of the existing EU law.

From the second point of view (concerning the “autonomy” or “dependence” of the actions proposed by the Commission from other social and institutional actors), it should be stressed that a large majority of these regulatory instruments is likely to be hard law, while a slight minority of them is likely to be soft law (in particular, in the area of sustainable food processing and distribution) or of national governments coordination (in particular, in the CAP area)²². However, the importance of soft law initiatives should not be underestimated. Indeed, if the transition to “multidimensional” food sustainability must affect the entire food supply chain, then the EU’s powers and competencies are not enough: a comprehensive transformation such as the one described by the Commission also requires the active involvement of Member States and citizens. This is made clear by what will be said later about the fundamental role played in the Strategy by the CAP, but another example could be the initiative to «develop an EU code and monitoring framework for responsible business and marketing conduct in the food supply chain»: self-responsibility of virtuous economic actors should be steered towards food sustainability, even beyond hard law rules.

But, even more interestingly, also most of the hard law initiatives described in the Annex are not “concrete” and, so to say, “self-executive”: take, for example, «the revision of the relevant implementing Regulations under the Plant Protection Products framework to facilitate placing on the market of plant protection products containing biological active substances» or the «legislative initiatives to enhance cooperation of primary producers to support their position in the food chain and non-legislative initiatives to improve transparency» or, to make only another example, the «proposal for EU-level targets for food waste reduction». These measures (and many others like them) will only create a general legislative framework that will enable other institutional, economic and social actors to realize the transition. Indeed, under the principles of competence, subsidiarity and proportionality, the Commission is only able to create the legal conditions for citizens, businesses and, above all, national governments to create sustainable food systems. The Commission is well aware

²² Obviously, given the generic and synthetic nature of Annex, these are only predictions: it is up to the future choices of European institutions to determine the actual composition (in terms of hard law or soft law) of the food and agricultural legal framework.

of that when it says, in the conclusions of the Strategy, that this transition «requires a collective approach involving public authorities at all levels of governance (including cities, rural and coastal communities), private sector actors across the food value chain, non-governmental organisations, social partners, academics and citizens». This is the reason why sometimes one may have the impression that the regulatory instruments proposed in the Annex only scratch the surface of the great ambitions of the F2F Strategy²³. The truth is that the EU cannot, alone, realize its challenging objectives. It can only create the general legislative framework (quantitative limits on the use of certain products, bans on the use of certain products, quantitative targets, labelling rules, economic incentives, etc.) within which other actors (in particular, Member States) should take concrete administrative or economic actions capable of realizing the transition.

To sum up, the Annex's regulatory actions reveal two fundamental implicit features of the F2F Strategy. The first one is its reformist attitude towards the existing EU regulatory framework. The second one is the fundamental role that it attributes to other actors besides European institutions, such as citizens, businesses and, mostly, Member States.

4. Continuity and Change: the F2F Strategy in the Evolution of Agriculture and Food Law

Once recalled the regulatory objectives and instruments of the F2F Strategy, we can now situate it in the historical evolution of EU agriculture and food law.

In this perspective, the Strategy can be considered a gradual evolution of the existing agriculture and food legislation through some real novelties and some rediscovered values. As for the novelties, the main innovation is represented by the autonomous dignity gained, in this field, by environmental protection. As for the rediscoveries, there is a new (wider) understanding of the concepts of food safety and food security²⁴. The prominence of these three

²³ Impression shared also by H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, pp. 586-587.

²⁴ The increased political sensitivity on (and the connection between) the issues of food security, food safety and sustainable agriculture is stressed by A. JANNARELLI, *Il diritto agrario del nuovo millennio tra food safety, food security e sustainable agriculture*, in *Riv. dir. agr.*, 2018, 4, pp. 511 ff. At p. 548 he says that «the main novelty compared to recent past is that the same issues

social values (which together form the “multidimensional” food sustainability) makes the economic impact of the Strategy’s policy proposals less important than it has traditionally been in the EU’s history.

Indeed, perhaps unsurprisingly, the F2F Strategy is first of all coherent with the relevant Treaty provisions. While laying down the conditions for renovating the food system, the Strategy does not go beyond the objectives of the CAP as established by Article 39 TFEU and *integrated* with the needs of environmental protection under Article 11 TFEU. Similarly, the regulatory instruments of the Strategy, which reflect this balance, are aligned with the measures listed in Articles 40 and 41 TFEU.

Also from the point of view of primary legislation, the F2F strategy represents a way to continue the transition of the CAP and of European food law towards a more ambitious project of “multidimensional” food sustainability.

To cut a long (and complex) story short, the CAP original main concern was market support (to foster productivity and, consequently, to ensure food security after the IIWW). Then, since 1992, it became producer support (in the form of direct payments to farmers to ensure their income and avoid production surpluses). In the meantime, in the near field of food law, the EU started to give increasing importance to “food safety”, originally conceived as the prohibition of «unsafe food», *i.e.* food that is «injurious to health» or «unfit for human consumption» (Regulation n. 178/2002). Therefore, one can say that, in recent times, food-related policies started focusing also on consumers²⁵.

During the last years, however, there has been a further eco-friendly evolution of the CAP. In the 2018 Regulation proposal for the CAP reform²⁶, its general objectives are defined by article 5 in this way: «(a) to foster a smart, resilient and diversified agricultural sector ensuring food security; (b) to bolster environmental care and climate action and to contribute to the environmental- and climate-related objectives of the Union; (c) to strengthen the socio-

concerning food safety and food security need to be addressed in the perspective of the so-called “sustainable development”, in which “productive agriculture” itself should be placed» (originally in Italian).

²⁵ *Amplius*, on the evolution of CAP, see S. CASSESE (ed.), *op. cit.*, pp. 100-103. On the history of European food law, B. M. J. VAN DER MEULEN, *The Structure of European Food Law*, in *Laws* 2013, pp. 73-78. See also G. BUIA, *Agricoltura multifunzionale e produzione integrata: profili giuridici*, in *RQDA*, 2019, p. 46 ff.

²⁶ COM (2018) 392 final.

economic fabric of rural areas». Even more interestingly, within the nine CAP specific objectives enlisted in article 6 of the Regulation proposal, six seem to anticipate quite accurately the contents of the F2F Strategy: «(a) support viable farm income and resilience across the Union to enhance food security; [...] (d) contribute to climate change mitigation and adaptation, as well as sustainable energy; (e) foster sustainable development and efficient management of natural resources such as water, soil and air; (f) contribute to the protection of biodiversity, enhance ecosystem services and preserve habitats and landscapes; [...] (h) promote employment, growth, social inclusion and local development in rural areas, including bio-economy and sustainable forestry; (i) improve the response of EU agriculture to societal demands on food and health, including safe, nutritious and sustainable food, food waste, as well as animal welfare»²⁷. Therefore, even if the European Green Deal is a cornerstone of the political action of the von der Leyen Commission, also the Juncker Commission started to orient European food policies towards climate change mitigation, preservation of biodiversity, promotion of bio-economy and, more generally, environmental protection²⁸. Thus, the Strategy did not come out of the blue, being instead the final (political) product of a mature political will.

As anticipated, the F2F Strategy seems coherent with this overall evolution of EU agriculture and food law and represents a further step of this process, characterized by four “new” features.

Firstly, after its decline in 1992, the importance of food security is emphasized again²⁹ (because of the growing population but also because of the “shock” of the COVID-19 pandemic³⁰), but its understanding is now enriched by the attention given to the value of “food variety”³¹. The Commission

²⁷ More information on the contents of the proposal can be found in SWD (2020) 93 final, p. 3-8. On p. 8-16, this document also clarifies that the links between the CAP reform and the F2F Strategy are more than those recalled in this essay and concern also operative aspects.

²⁸ However, as A. MASSOT MARTI, *op. cit.*, pp. 17-19 observes, the reform of the CAP will be affected by the new «socio-economic, environmental and institutional» background post-2020.

²⁹ See also F. ALBISINNI, *La definizione di attività agricola nella nuova PAC, tra incentivazione e centralizzazione regolatoria*, in *Riv. it. dir. pubbl. comunit.*, 2014, p. 967 ff.

³⁰ On the impact of the COVID-19 pandemic on the food system, see L. PAOLONI, *La sostenibilità “etica” della filiera agroalimentare*, in *Riv. dir. alim.*, 2020, 4, pp. 7 ff. See also P. CAVARZERAN, *COVID-19 e agricoltura. La gestione europea della crisi nel contesto di transizione della PAC*, in *Riv. dir. agr.*, 4, 2020, pp. 925 ff.

³¹ For the importance of the concept of “food diversity” and for the renewed importance of the value of “food security” in EU agricultural policies, C. NAPOLITANO, *Food security: percorsi per la sostenibilità alimentare*, in *RQDA*, 2020, 2, pp. 83-84. See also M. MONTEDURO, *Diritto*

ambitiously speaks of the need to ensure a «sufficient and varied supply of safe, nutritious, affordable and sustainable food».

Secondly, the concept of food safety is widened because it considers now not only directly “injurious” (toxic) food (like Regulation n. 178/2002) but also “unhealthy” food, which causes “ordinary” pathologies (such as obesity, cardiovascular diseases and cancers). The aim is to guarantee to European citizens «healthy and sustainable diets will benefit their health and quality of life, and reduce health-related costs».

Thirdly, environmental protection gains autonomous dignity (even if from an anthropocentric point of view) in the agriculture, fishery and food sector³² and it is pursued notwithstanding other concerns. The entire F2F Strategy is an expression of this new approach in which environmental protection is an objective *per se*, but a clear and specific example of it is the part of the Strategy on carbon sequestration: this proposal has indeed no other aim than the environmental one³³.

Fourthly, and lastly, compared to food security, food safety and environmental protection (that together form the “multidimensional” food sustainability), the economic impact of the transition is not a major concern of the F2F Strategy and it is easily dismissed by saying that «the transition to sustainability presents a first mover opportunity for all actors in the EU food chain». Rather, purely economic measures of the CAP (such as direct payments) are made instrumental to the achievement of environmental objectives (so-called eco-schemes). In other terms, market and producer support are relevant for the Strategy as long as they contribute to the realization of the transition to food sustainability. However, the “marginality” of the economic consequences of the Strategy is only formal and apparent: indeed, as we will see in the next paragraph, the economic growth perspective is somehow implicit in the

dell'ambiente e diversità alimentare, in *RQDA*, 2015, 1, pp. 116 ff. For the concept of “agrobiodiversity”, M. BRUNORI, *Which pathways for agrobiodiversity in the new CAP reform?*, in *Riv. dir. agroalimentare*, 2020, 2, pp. 277 ff.

³² On the recent “greening” of the CAP and, more generally, on the environmental impact of agricultural activities, see G. A. PRIMERANO, *Il carattere multifunzionale dell'agricoltura tra attività economica e tutela dell'ambiente*, in *Dir. Amm.*, 2019, p. 837 ff.

³³ Even if it should be realized also through economic incentives. Indeed, there is no need to clarify that, even if the farmers who realize carbon sequestration practices are economically rewarded, the aim of this policy proposal remains exclusively environmental.

underlying rationale of the proposals of the Commission³⁴, which believes that the realization of a “multidimensional” food sustainability will also determine the creation of «new green business models», more competitive and modern.

In conclusion, from a legal point of view, the F2F Strategy does not break the existing regulatory framework of EU agriculture and food law. Rather, it is a gradual evolution of the existing legislation, an evolution in which social values (food security, food safety and environmental protection) acquire wider significance and greater importance. From the perspective of “multidimensional” food sustainability, the assessment of the purely economic impact of the transition becomes somehow silent and implicit (but still present, as will be clarified in the next paragraph).

5. The F2F Strategy as a Social Regulation Agenda

What has just been said suggests that the F2F Strategy is not about economic integration³⁵ or economic regulation. It is, instead, a project of social regulation. This is the real “substantive” meaning of the “multidimensional” food sustainability objective pursued by the Commission.

To clarify this statement, it is first of all necessary to explain the meaning of the expressions “economic regulation” and “social regulation”. Following Giandomenico Majone, we can consider economic regulation as the regulation directed to improve «the efficiency of the economy by correcting specific forms of market failure such as monopoly, imperfect information, and negative externalities»³⁶. On the contrary, to understand the meaning of “social regulation”, we can recall the work of Alfred Müller-Armack on “social market

³⁴ According to A. MASSOT MARTI, *op. cit.*, p. 5, «the European Green deal goes well beyond just climate policy. It includes an EU’s new sustainable growth model emphasising that decarbonisation, sustainability, protection of natural resources, public health, and economic competitiveness must go hand-in-hand». It is not by chance that “economic growth” is mentioned by the Commission at the beginning of the part of the Strategy called “Promoting the global transition”: even if it is not an objective of the Strategy, it is still the traditional policy paradigm, implicit also in the Strategy.

³⁵ It is the well-known history of the creation of the EU customs union and monetary union, on which S. CASSESE (ed.), *op. cit.*, pp. 67-137. See also C. JOERGES-F. RÖDL, “*Social Market Economy*” as Europe’s Social Model?, EUI Working Paper, n. 2004/8, pp. 3-9.

³⁶ G. MAJONE, *The rise of the regulatory state in Europe*, in *West European Politics*, 1994, p. 79. For some failures of the food market, L. COSTATO, *Il “Dio mercato” e l’agricoltura*, in *Riv. dir. agr.*, 2018, 1, pp. 88 ff.

economy”³⁷: in this paradigm, the regulation pursues social objectives, but these are in any case «subordinated to the functionality of market mechanisms». The concept of social regulation may be better understood through a comparison with the different concept of welfare social policy: while in the latter the State creates alternatives to the market through tax-financed public services directed to free citizens from some of their basic needs (such as healthcare, education, etc.), in the former regulatory actions that «threaten to distort market competition and its core, the price mechanism, are excluded from the socio-political agenda»³⁸.

Following these definitions, the F2F Strategy can be considered a social regulation agenda. As argued before, the F2F Strategy has a reformist legal approach in which the social values of food security, food safety and environmental protection compose the macro-objective of food sustainability: however, the Commission believes that this macro-objective could and should be realized by the (common) market. Indeed, the transition to a “multidimensional” food sustainability needs to be (also) economically sustainable. In other words, the Strategy should not distort (or replace) the food market, but rather exploit its hidden “green” potentialities. Therefore, while the objectives of the Strategy are predominantly social, its subjects (those who are called to make the transition happen) are private individuals and businesses, steered and coordinated by European (and national) public institutions.

As already argued, however, the market is not an objective of the Strategy for itself. On the contrary, agriculture, fishery and food markets seem to be redesigned as «social economic spaces» and are considered instrumental to the achievement of social purposes. Their negative externalities on the environment (and on the health of present and future generations) are therefore corrected through different measures (quantitative limits on the use of certain products, bans on the use of certain products, quantitative targets, labelling

³⁷ A. MÜLLER-ARMACK, *Wirtschaftslenkung und Marktwirtschaft*, 1946 reprinted in *Wirtschaftsordnung und Wirtschaftspolitik. Studien und Konzepte zur sozialen Marktwirtschaft und zur europäischen Integration*, Freiburg, 1966, pp. 19-170. This study is recalled by C. JOERGES-F. RÖDL, *op. cit.*, pp. 12 ff.

³⁸ These quotes are taken by C. JOERGES-F. RÖDL, *op. cit.*, p. 16. The Authors do not define the concept of welfare social policy. However, it can be derived *a contrario* by Müller-Armack's definition of “social market economy”, which is conceived as opposed to «the socialist or at least interventionist (mixed economy)» project.

rules, corporate governance systems, etc.)³⁹. The Commission states indeed that the transition to a sustainable food system «is also a huge economic opportunity»: however, economic growth is not an objective of the Strategy *per se* but rather a positive consequence of its implementation. A consequence that the Commission considers inevitable because it conceives the Strategy as an avant-garde and anticipatory project in a world that changes (better, that must change) in the direction of environmental sustainability. Therefore, the F2F Strategy is not an economic regulation project.

But the Commission does not either want to create a real alternative to the market: the paradigm is always the (now sustainable) economic growth paradigm. Indeed, as food sovereignty⁴⁰ scholars pointed out in their “collective response” to the F2F Strategy⁴¹, the Commission failed to take up in its Communication the recommendation of a group of independent experts according to whom «food must be viewed more as a common good rather than as a consumer good»⁴². Considering this, the Strategy cannot be considered a welfare social policy proposal. Instead, it is a perfect example of social regulation: the economic dynamics of the market are steered towards the creation of a sustainable food system (which is a socially valuable objective). Even economic public incentives, such as the so-called eco-schemes or the guarantees of the InvestEU Fund, do not aim at replacing the market. They only aim at boosting “sustainable practices” and, in this way, promoting the “transition” to environmental sustainability of the common market itself, which remains the core of the European unitary project. Indeed, the Commission explicitly says that «the framework [for a sustainable food system] will allow operators to benefit from sustainable practices and progressively raise sustainability standards so as to become the norm for all food products placed on the EU market». Ultimately, the fundamental economic rationale is always Alfred Müller-Armack’s “social market economy”.

³⁹ Also, D. BEVILACQUA, *Il Green New Deal e la regolazione pubblica*, in *Riv. giur. ambiente online*, 19, March 2021.

⁴⁰ For the concept of food sovereignty, see A. RINELLA, *Food sovereignty*, in *RQDA*, 2015, 1, pp. 16 ff. For a critical analysis, G. ZAGREBELSKY, *Sovranità alimentare: un concetto costituzionale*, in *Riv. dir. agroalimentare*, 2017, 3, pp. 435 ff.

⁴¹ Food sovereignty scholars (G. ALBERDI et al.), *A collective response from food sovereignty scholars on the EU’s Farm to Fork Strategy*, May 2020.

⁴² Group of Chief Scientific Advisors, Scientific opinion n. 8, *Towards a Sustainable Food System*, Brussels, March 2020, p. 7.

This is made clear also by the paragraph regarding the need to ensure food security in times of crisis, in which the Commission does not consider food as a “common good”. Instead, it only proposes to use the “agricultural crisis reserve”, which is however a simple form of «additional support for the agricultural sector in the case of major crises affecting the agricultural production or distribution» obtained from «a reduction to direct payments» to farmers⁴³. This is the old idea of producer support, applied to (modern) times of crisis. Surely, it is not a form of welfare social policy in which food is produced and distributed for free by public institutions. The Commission believes that, also for future unpredictable crises, the solution will come from the common market (with some public incentives).

To sum up, the F2F Strategy is an advanced form of regulation that proposes an integrated and comprehensive approach that steers the entire food process, from the producer (“farm”) to the consumer (“fork”) by way of the food processing actors (industry)⁴⁴, towards an idea of food sustainability based on three social fundamental values: food security, food safety and environmental protection. Therefore, the Strategy is a social regulation agenda: indeed, food sustainability is a social macro-objective and the idea of the Commission is that the common market could achieve it on its own after having been correctly shaped and steered by public policies. Consequently, economic growth is not an objective of the Strategy for itself, but it is considered as a certain positive consequence of the transition because, according to the Commission, the Strategy «presents a first mover opportunity for all actors in the EU food chain». In other terms, even if the Strategy is not an economic regulation project, the economic growth paradigm is somehow implicit in its “social market economy” philosophy. Furthermore, being consistent with this philosophy, the Commission does not want to use the F2F Strategy to propose a welfare social policy agenda. Indeed, it believes that the food supply chain, even in times of crisis, cannot be entirely public: according to the Commission, it is necessarily private and, for this reason, it is up to farms and food companies (and citizens) to become environmentally sustainable, with some help from public institutions. Therefore, also from a more “substantive” point of view, the

⁴³ Article 25 of the Regulation n. 1306/2013.

⁴⁴ As H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 586 notice, «it is the first time in the history of EU food law that the union has addressed food sustainability in a comprehensive manner, from primary production to the consumer».

cautious reformist approach of the Strategy is confirmed: to realize the huge transition to a sustainable food system, the Commission intends to follow known (legal and substantive) regulatory paths.

6. *The F2F Strategy's Possible Shortcomings*

In the previous pages, we have reconstructed the relationship between the F2F Strategy and the existing EU agriculture and food law. We should now develop such analysis by considering the possible flaws of the approach taken by the Commission in the Strategy.

Among the shortcomings so far detected by commentators and social actors, three of them are relevant to our analysis.

To begin with, it is argued that the F2F Strategy gives a too important role to CAP⁴⁵ (of whose budget, nearly a third should be devoted to climate change mitigation and environmental protection actions⁴⁶). Indeed, the CAP has a “dark side”: it strongly relies on the action of Member States’ national governments⁴⁷. After its reform, national Strategic Plans will be even more important⁴⁸. Therefore, the success of the Strategy will strongly depend on the capacity of the Commission to steer the Member States towards the idea of food sustainability⁴⁹. The Commission shows to be aware of that when it recognizes that «the [CAP] strategic plans will need to reflect an increased level of ambition to contribute to reaching these targets»⁵⁰. However, commentators

⁴⁵ See also A. MASSOT MARTI, *op. cit.*, p. 19-20. For a critical overview of the CAP’s reforms, F. ALBISINNI, *La nuova PAC e le competenze degli Stati Membri tra riforme annunciate e scelte praticate*, in *Riv. dir. agr.*, 2020, 1, pp. 43 ff.

⁴⁶ SWD (2020) 93 final, p. 7.

⁴⁷ On this, in the perspective of the nexus between food security, food safety and environmental protection, A. JANNARELLI, *Agricoltura sostenibile e nuova PAC: problemi e prospettive*, in *Riv. dir. agr.*, 2020, 1, pp. 23 ff.

⁴⁸ SWD (2020) 93 final, p. 3, where it is said: «the future CAP is proposed to be implemented through national CAP Strategic Plans, a programming tool that will define, for each Member State, the key parameters for the implementation of all CAP instruments (direct payments, rural development and sectorial interventions). The proposal provides for objectives and a set of broad types of interventions laid down at EU level, establishing what Member States can do with the resources allocated to them: each Member State will be free to select and further design the specific measures it considers the most effective in meeting its own specific needs. A common set of indicators is proposed at the EU level to allow monitoring of policy implementation and an evaluation of policy impact based on common indicators».

⁴⁹ SWD (2020) 93 final, p. 20.

⁵⁰ SWD (2020) 93 final, p. 9.

have already shared «their worries about the lack of ambition among Member State governments, as well as the relabelling of CAP instruments as climate expenditure without having substantive climate impacts»⁵¹.

A second possible flaw, underlined by food sovereignty scholars, is represented by the fact that the Strategy gives an «active role for the financial sector, rather than public policies». According to them, this «can lead to further promotion of farm concentration and accelerate the disappearance of small-scale farmers that are the core of agroecology and a sustainable food systems approach»⁵². Therefore, they argue that the Strategy relies too much on private capital.

The third criticism was raised by the European Federation of Food Agriculture and Tourism Trade Unions (EFFAT), which suggested that more attention needs to be given to economic and social negative impacts (job losses, new skills required, etc.) of the Strategy⁵³: indeed, «food processing, agriculture and hospitality are not included among the sectors covered by the Just Transition Fund as proposed». According to the EFFAT, «social policies must be fully integrated into the new vision» of the Strategy⁵⁴.

To sum up, from a wide legal point of view, we can identify three main possible shortcomings of the F2F Strategy detected by commentators and social actors: i) too much reliance on Member States, ii) too much reliance on private capital and market dynamics, iii) too little attention on social negative impacts of the transition.

Time will tell whether these criticisms are correct. In the meanwhile, we can stress the fact that each of the three flaws derives from the limits of the cautious and reformist approach of the Strategy.

⁵¹ H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 587. See also p. 588, where they say that «successful coordination with the Member States is therefore a prerequisite without which there is a real risk of a watering down of the Strategy's ambitions in the Member State implementation phase». The same criticism is shared by H. MOSCHITZ et al., *How can the EU Farm to Fork strategy deliver on its organic promises? Some critical reflections*, in *EuroChoices*, 2021, 20(1), pp. 30-31.

⁵² Food sovereignty scholars (G. ALBERDI et al.), *op. cit.*, p. 2.

⁵³ A similar worry is shared by H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 588.

⁵⁴ European Federation of Food Agriculture and Tourism Trade Unions, *For a successful EU Farm to Fork Strategy*, 2020, p. 2 and p. 4. A similar criticism is expressed by H. MOSCHITZ et al., *op. cit.*, pp. 33-34. They observe that «the key role of innovation is clearly identified in the F2F strategy, but the focus is almost exclusively on nature-based, technological and space-based solutions, largely neglecting social processes»: therefore, according to them, more attention should be given to the education and training of the people involved in the transition (farmers, consumers, etc.).».

Let us start with the third criticism. It is quite clear that Trade Unions point to the lack of a real social policy in the Strategy: they underline the need of embedding into it a stronger social justice action. However, as argued before, the Commission does not want, in this Communication, to open a new path of the EU substantive action, *i.e.* the path of welfare social policies. Indeed, the element of the “just transition” is quite rhetorical and superficial in the text of the Strategy: the idea of the Commission is that the «shift to a sustainable food system can bring [...] social benefits», without the need of a specific public intervention to support the ones damaged by the transition (other than the traditional producer support payments of the CAP). But the EFFAT underlines precisely that it is unlikely that the social “wounds” of the transition will be spontaneously healed by the market. Nevertheless, it is true that the European Green Deal also includes a Just Transition Mechanism, in which an important role is played by a Just Transition Fund financed through the EU budget. But, at the moment, it seems that this instrument will be used only to give a support that should be always «linked to promoting a transition towards low-carbon and climate-resilient activities», providing to citizens vulnerable to the transition «access to re-skilling programmes, jobs in new economic sectors, or energy-efficient housing»⁵⁵. This is an expression of the traditional “social market economy” approach: public funds are used to steer private individuals towards jobs and activities that are (environmentally and socially) sustainable. The idea is that the market, with a little public support, should become able to achieve the goal of food sustainability and to repair social damages on its own. This is, as said before, the overall rationale of the F2F Strategy. Obviously, one cannot exclude that, in the future, the Commission will decide to use part of the Just Transition Fund to realize also some real welfare social policies *beyond* the market (such as providing a basic income to citizens who have lost their jobs because of the transition): but, at the moment, this is not probable nor foreseeable.

The criticism of food sovereignty scholars is similar. Indeed, they believe that the Strategy’s strong reliance on private investments may boost processes, such as “farm concentration”, that they think are negative (also) for the environment. For this reason, they advocate for a major role of public

⁵⁵ COM (2019) 640 final, p. 16. See also the website of the European Commission, page: The European Green Deal Investment Plan and Just Transition Mechanism explained.

investments, asking for a stronger social policy capable of maintaining and promoting certain modes of production, such as «small-scale producers and peasant agriculture». This may imply only a difference of understandings about the better ways to realize food sustainability: indeed, food sovereignty scholars support the paradigm of agroecology⁵⁶, while the Commission always relies on the paradigm of (green) economic growth. While leaving open the question of which option would be preferable, however, the criticism of food sovereignty scholars reveals that the Commission aims at realizing the only form of food sustainability that the market, with a little public support, can achieve on its own. Therefore, social and environmental objectives are subordinate to the logic of the market. This confirms once again that the core of the European Green Deal, as of the whole European unitary project, is the common market: its dynamics, even in a social regulation programme, cannot be distorted too much. Consequently, the Commission imagines a form of food sustainability inside the logic of the capitalist market, with all its (positive and) negative consequences. This is exactly the reason why food sovereignty scholars affirm that «the (green) economic growth paradigm [...] reified by the European Green Deal, perpetuates unsustainable lock-ins and entrenched inequalities»⁵⁷. In the end, their “collective response” reinforces the opinion expressed before: the F2F Strategy is a cautious (and not ground-breaking) reform of the current food production and distribution processes. Thus, it is a perfect example of social regulation.

EFFAT and food sovereignty scholars' criticisms both emphasize the need for a stronger social (environmental) commitment of the EU, even if from different perspectives (social security for the EFFAT and environmental protection for food sovereignty scholars). On the contrary, the first possible flaw recalled above does not concern this aspect, but the institutional architecture of the EU. In fact, it seems to advocate for greater autonomy of the action of EU institutions at a supranational level. Excessive reliance on national governments could indeed undermine the ambitions of the F2F Strategy and increase differences and asymmetries among Member States. However, one has to consider that the implementation of the CAP (or of similar policies of diffuse

⁵⁶ For a definition of the complex concept of agroecology, see E. LENI, *What Legal Foundations for Agroecology? Exploring Insights from the Thai Sufficiency Economy Philosophy*, in *RQDA*, 2019, 2, pp. 1 ff.

⁵⁷ Food sovereignty scholars (G. ALBERDI et al.), *op. cit.*, p. 1.

public control and intervention) requires huge administrative resources that the Commission does not have now. The proposed CAP reform seems to explicitly accept this, being characterized by a legal shift «from rules and compliance towards results and performance»⁵⁸ and recognizing National Strategic Plans as the main instrument to the realization of economic and environmental objectives. Thus, EU institutions are fully aware of their operative limits. In the current institutional context, the Commission knows that it can only act as a coordinator of the actions of national governments. The Strategy exactly shows that, for now, European public institutions can only fix common standards, binding limits, quantitative targets, create common legal frameworks and coordinate policies: but the relevant administrative implementing actions (such as direct payments, local projects, etc.) can only be done by national administrations (even if, sometimes, in the form of joint implementation). The dependence on the action of Member States is a hallmark of the European integration project and the Strategy confirms such consolidated feature, although its challenging ambitions make the limits of this architecture even tighter and clearer.

7. Concluding remarks

This essay has analysed the structure and the rationale of the F2F Strategy.

In the first descriptive paragraphs, we have stressed that it has one ambitious macro-objective, *i.e.* the creation of a sustainable food system, which has a “multidimensional” meaning based on three social values: food security, food safety and environmental protection. This macro-objective is then articulated in several sub-objectives, some “intermediate” and some specific: the main text of the F2F Strategy is indeed a regulatory agenda that adopts a progressive, comprehensive and integrated approach to food sustainability. But it also has an Annex that includes a list of regulatory actions, which reveal the cautious reformist approach of the Commission and the importance of a collective implementing effort of all the institutional, economic and social actors of the EU (in particular, Member States).

⁵⁸ This is the exact wording used on the website of the European Commission, page: Future of the common agricultural policy.

After that, we have stressed the coherence between the F2F Strategy and the existing EU agriculture and food law. Indeed, the F2F Strategy is an integrated application of Articles 11, 39, 40 and 41 TFUE and a continuation of the evolution process of food and agricultural primary law through some real novelties (such as the autonomous attention given to environmental protection) and through a new understanding of some “rediscovered” concepts (food safety and food security).

Then, we have tried to identify the “substantive” rationale of the F2F Strategy by considering the different models of economic regulation, social regulation and welfare social policy. We have seen that the Strategy is a social regulation project. Indeed, at its core, there is the idea that the common market should be shaped and steered to achieve the “multidimensional” food sustainability (which is a social objective). Economic growth is considered as a certain consequence of this approach, but it is not an objective of the Strategy for itself. Moreover, the Commission does not want to create alternatives to the market: food is not conceived as a “common good”.

In the last paragraph, some possible flaws of the F2F Strategy have been discussed. We have said that they derive from the limits of the cautious and reformist approach of the Commission. Indeed, some criticisms point to the lack of a strong social justice action: however, the Commission does not want the Strategy to open a new (foundational) path of welfare social policy in the EU and, consequently, it is up to the market (appropriately steered by public institutions) to absorb any negative social impacts of the transition. Moreover, other criticisms underline, from an institutional point of view, the excessive reliance of the Strategy on the implementation actions of Member State: however, in the European institutional architecture, direct and diffuse administrative action has always been responsibility of national governments and, according to the Commission, the F2F Strategy is not the occasion to change this fundamental feature of the EU.

To conclude, the F2F Strategy is a challenging reformist project that represents an evolution (rather than a revolution) of the existing EU agriculture and food law: it is, in other terms, an attempt to satisfy the urgent needs of environmental protection *within* the existing institutional, political and economic architecture of the EU. This does not imply a negative judgment on the F2F Strategy. The point is that the analysis has shown a relationship of continuity, not of rupture, between the F2F Strategy and the existing EU

regulatory framework. But this does not mean that the F2F Strategy is not ambitious enough: indeed, its success will depend on the bravery that the Commission and the Member States (and all other EU social and economic actors) will show in implementing it through legal, administrative and economic measures⁵⁹. The F2F Strategy, like the entire European Green Deal, is indeed only the political starting point for our collective effort to address the most important and urgent challenge of modern times, that of saving our “common home”⁶⁰.

⁵⁹ The same opinion is shared by H. SCHEBESTA-J. L. CHANDEL, *op. cit.*, p. 586.

⁶⁰ The expression “common home” is used by the Holy Father Francis in the Encyclical letter *Laudato si’ on care for our common home*, 24th May 2015.

ABSTRACT

Filippo Venturi - *The Farm to Fork Strategy. A Comprehensive but Cautious Approach to “Multidimensional” Food Sustainability*

This paper focuses on the “Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system”, adopted by the European Commission in May 2020. Firstly, it provides a conceptual analysis of the objectives of the F2F Strategy: the “multidimensionality” of the macro-objective of food sustainability is underlined. Secondly, the paper examines the regulatory instruments proposed by the European Commission to realize this ambitious agenda: in particular, it underlines the fact that the F2F Strategy adopts a cautious reformist approach based on the cooperation of all the institutional and economic actors involved in the food system. After this descriptive analysis, the paper situates the F2F Strategy in the (recent) history of EU agriculture and food law and frames it as a gradual evolution of the existing legislation through four “new” features: the regained importance of the concept of food security, the enlargement of the concept of food safety, the autonomy of environmental protection in agricultural and food law, and the (only apparent) irrelevance of the economic impact of the transition. The latter point is then critically and specifically analysed: the conclusion is that the F2F Strategy represents a “social regulation” agenda in which the EU tries to realize a multi-layered social objective (food sustainability) through the steering of (common) market. In other words, the underlying “substantive” rationale of the F2F Strategy is the traditional economic growth paradigm, now “greened”. Lastly, three possible flaws of the F2F Strategy’s cautious and reformist approach are discussed: the lack of a strong social justice action, the excessive economic reliance on private capital and the excessive institutional reliance on the implementation actions of Member States.

KEY-WORDS: *Farm to Fork Strategy; European Green Deal; EU agriculture and food law; common agricultural policy; sustainable food system; food safety; food security; environmental protection; social regulation; social market economy.*