European Economic and Social Committee

OPINION

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Towards a sustainable plant protein and plant oil strategy for the EU

Towards a sustainable plant protein and plant oil strategy for the EU
(own-initiative opinion)

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1. Conclusions and recommendations

1.1 Livestock farming (including meat and dairy products and eggs) is an economically important agricultural sector in the EU. However, in recent years it has increasingly been the subject of public debate, among other things because of the regional and global environmental impact of intensive livestock farming and because the sector is heavily dependent on animal feed imports. This last point raises concerns about the EU's feed and food security. In particular, there is considerable dependency (around 75%) on imports of plants with a high protein content.

1.2 As well as indirectly using arable land outside the EU, the livestock sector also takes up a large part of the arable land within the EU. Around 50% of the harvest is used as animal feed to produce animal-based products; less than 20% is used directly by people as plant-based food.

1.3 A European protein strategy has been under discussion for years, but there has been little progress to date on declarations to expand protein crop production in Europe. With this opinion, the European Economic and Social Committee (EESC) would like to provide guidance on what additional aspects should be taken into account.

1.4 The EESC points out that, in the EU, there is little shortage in the protein supply in the (plant-based) food sector itself, but rather and more importantly in the feed sector. There are many good reasons to expand protein production in the EU and, in particular, to increase the role of grassland in feeding animals. However, despite the existing potential, in purely quantitative terms it will not be possible to fully substitute the high level of protein imports with European production without triggering profound consequences for other sectors of agricultural production.

1.5 The EESC further highlights that expanding oil crop cultivation in the EU could also lead to positive impacts such as self-sufficiency in terms of tractor fuel, increased availability of oil cakes supply that have an excellent protein feed potential and increased crop rotations.

1.6 After all, there is an absolute limiting factor: the agricultural area available. Although both conventional and organic farming are continuously taking innovative steps to increase productivity, they too are reaching their limits in terms of volume. The EESC therefore believes that there is an urgent need for the EU to carry out a study on the Europe-wide potential and land-share of protein and oil crops that could be grown within the EU.

1.7 An important part of the European protein strategy must be to make livestock farming as a whole compatible with EU and UN objectives regarding European and global food security, supply autonomy and sustainability. Increased protein production in the EU is only part of this. Globally, a trend in which the global average per capita consumption of meat and dairy products approaches the current levels of developed economies seems incompatible with the UN SDGs.

1.8 A European protein and oil strategy should also contribute to the sustainable development of rural areas in line with the EU long-term vision on rural areas, for example through the development of new regional value chains that are self-sustaining.

1.9 In Germany, a "Commission on the Future of Agriculture (ZKL)" set up by the federal government, in which all relevant social groups were represented, developed proposals for a sustainable agricultural and food system, including the livestock sector, using a comprehensive approach. It proposed changes in production methods to be implemented through a set of tools (remuneration through markets and payments) to enable all farmers to adapt if possible. The EESC recommends that the European Commission look more closely at the format of this process and consider whether it would also be appropriate for the development of a European protein strategy.

1.10 A protein strategy that also meets the objectives of strategic supply autonomy will have to include the following:

- fostering research and innovation in the area of plant-based proteins along the entire value chain and for need-oriented and optimised use of plant-based protein sources;
- developing and more strongly promoting protein potential in the EU;
- strengthening a sustainable domestic production of plant-based proteins, produced in accordance with the high European standards;
- developing and expanding regional value chains and regional processing capacities;
- continuously collaborating with institutions and agricultural organisations to promote the cultivation and use of domestic plant proteins in the food and feed industry;
- further increasing crop potential by improving and broadening breeding strategies;
- expanding education and advisory services and knowledge transfer;
- enabling and facilitating protein-crop production on ecological focus areas;
- more strongly linking livestock farming with regional feed potential;
- consistently complying with existing limit values for pollution caused by emissions (nitrate in surface and ground water, ammonia, etc.); internalising external costs;
- promoting particularly animal-friendly farming practices through consumer information and product labelling;
- setting production and quality standards addressing the health and environmental impact of imports of products competing with those produced in the EU;
- running an information campaign in parallel on the consequences that different dietary habits have on the environment and health.

2. Introduction and background

2.1 EU agricultural policy and practice have been successful in terms of food supply but are now focused more on sustainability issues and on achieving the objectives of the Green Deal and the SDGs, including through the Farm to Fork Strategy. The focus has also been on the goal of strategic supply autonomy, especially since the COVID-19 pandemic and the war in Ukraine.

2.2 Livestock farming (including meat and dairy products and eggs) is an economically important sector in the EU. However, in recent years it has increasingly been the subject of public debate for a number of reasons; one aspect is its strong dependence on animal feed imports.

2.3 The European Parliament's resolution on *A European strategy for the promotion of protein crops*[1] refers to a "major deficit in vegetable proteins due to the needs of its livestock sector" and states that the situation "has regrettably seen little improvement [...] despite the use of co-products from biofuel production in animal feed". The EU "devotes only 3% of its arable land to protein crops and imports more than 75% of its vegetable protein supply, mainly from Brazil, Argentina and the United States"[2], although the total European production of protein-rich matter rose from 24.2 to 36.3 million tonnes (up 50%) between 1994 and 2014, but at the same time consumption increased from 39.7 million tonnes to 57.1 million tonnes (up 44%)[3]. Political decisions such as the Blair House Agreement have been instrumental in creating these dependencies.

2.4 Soya meal plays an important, even a leading role in the feed industry[4] and "is a privileged ingredient in compound feed formulation, because of its high protein content (over 40%), amino acid content and year-round availability, which limits the need for frequent reformulation[5]."Soya consumption in Europe has risen from 2.4 million tonnes in 1960 to almost 36 million tonnes a year. Meeting this huge demand for soya requires an area of almost 15 million hectares,"13 million ha of which are in South America"[6]; this equates to more than the total area of arable land in Germany (11.7 million ha)[7]. The vast majority of imported soya (around 94%) is made up of genetically modified varieties.

2.5 The plants with a high protein content (over 15%) mentioned in the Commission document[8] account for "about 1/4 of the total crude plant protein supply in the EU. Although cereals and grassland **significantly** contribute to the total EU plant protein supply", surprisingly the Commission does not include them in its strategic reflection on plant proteins "because of a low protein content and low market relevance, respectively"[9]. The EESC cannot accept this argument.

2.6 The high level of imports, especially of soya, is primarily due to the fact that the natural cultivation conditions in the US and South America make it much cheaper to produce soya there; the at times significantly lower environmental and social standards also play a role, such as the deforestation of natural forests in South America, and the displacement of indigenous

1 European Parliament resolution of 17 April 2018 on a European strategy for the promotion of protein crops.

2 European Parliament resolution of 17 April 2018, point E. Comment from the EESC: the 75% dependency refers to protein crops with a high protein content; the importance of grass and cereals as a source of protein for animals is inexplicably overlooked in many discussions.

3 European Parliament resolution of 17 April 2018, point L.

4 Report from the Commission to the Council and the European Parliament on the development of plant proteins in the European Union, COM(2018) 757 final, page 2.

5 COM(2018) 757 final, page 3.

6 European Parliament resolution of 17 April 2018, point L.

7 According to Eurostat, Europe's total agricultural area (including pastures and meadows) is around 174 million ha (data before Brexit).

8 COM(2018) 757 final.

9 European Parliament resolution of 17 April 2018.

peoples and small-scale farmers[10]. The EESC welcomes the fact that the Commission has recognised the problem and is advocating "deforestation-free supply chains"[11].

The EU has not adopted any satisfactory initiatives that could really reduce import dependency, either in the latest common agricultural policy (CAP) reform proposals or in negotiations with the Mercosur countries.

2.7 In this connection, it is worth mentioning that, under the current CAP, protein production has particularly benefitted from Ecological Focus Areas (EFAs), which will no longer exist after the reform. Nitrogen-fixing crops are the most frequently declared type of crop for EFAs, accounting for as much as 37% of EFA usage. The submitted national strategic plans for the implementation of the new CAP are yet to be evaluated, so it is not yet possible to say whether they will improve or worsen the situation. Although the Member States have a number of options (in particular, coupled payments) for promoting cultivation, initial analyses suggest that a) not all Member States will make use of them and b) the funding levels are not attractive enough.

2.8 The EESC's position is clear: "improving the EU's protein autonomy is desirable from all points of view. Imports of soybeans from third countries can be responsible for deforestation, forest degradation and the destruction of natural ecosystems in certain producing countries. The development of legumes and pulses with high protein content in the Union would limit the use of imports and thus have a positive impact on the climate and the environment"[12].

2.9 Nobody disagrees with this position. On the contrary, the need for a corresponding European protein strategy has been under discussion for a long time in the EU, but so far this has led to little more than commitments to expanding European protein production and the tools mentioned in point 2.7, so an effective European protein strategy is still a long way away.

2.10 Since the beginning of the COVID-19 pandemic, and certainly with the war in Ukraine, it has become clear that the global division of labour and trade relations do not only have a positive impact. They can lead to problems that were not previously, or were insufficiently, considered. The new key term is strategic supply autonomy. Whether we are talking about shortages of face masks, medicines, semiconductors or fossil fuels such as gas, oil and coal, dependencies can lead to severe economic and social disruption.

2.11 The war in Ukraine and its expected long-term consequences will have a lasting impact on both the European and the global agricultural sector and on the European food industry, requiring changes.

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10 EESC opinion on Minimising the risk of deforestation and forest degradation associated with products placed on the EU market, OJ C 275, 18.7.2022, p.88.

11 EESC opinion on Minimising the risk of deforestation and forest degradation associated with products placed on the EU market, OJ C 275, 18.7.2022, p.88.

12 EESC exploratory opinion requested by the French presidency of the Council on Food security and sustainable food systems, OJ C 194, 12.5.2022, p. 72, point 1.3.ii.

2.12 The EESC resolution on *The war in Ukraine and its economic, social and environmental impact*[13] stresses that "the conflict will inevitably carry severe consequences for the EU's agri-food sector, which will require additional support; to this end; underlines that the EU must reinforce its commitment to deliver on **sustainable food systems** [...] in particular, the EU must improve its food security by reducing dependencies on key imported agricultural products and inputs".

2.13 At the same time, the EESC stresses that "the impacts of the war should not come to the detriment of climate action and sustainability" and that the UN 2030 Agenda SDGs also promote peace, security and poverty reduction. Progress would be made towards implementation of the UN 2030 Agenda and a just transition through the **European Green Deal**.

2.14 The EU heads of state and government also addressed this issue in the Versailles Declaration from 11 March 2022, which states: "We will improve our food security by reducing our dependencies on key imported agricultural products and inputs, in particular by increasing the EU production of plant-based proteins."[14]

3. Facts and trends

3.1 The EESC believes that, when developing a comprehensive European protein strategy, systemic issues must be discussed and taken into account to a much greater extent. This includes clarifying how the current system is to be assessed from the point of view of European strategic supply autonomy and global and regional sustainability, and what advantages and disadvantages it has for farmers, consumers, the environment and livestock. Current trends that affect the protein supply sector must also be considered.

Food, fuel or feed – what are we growing and what becomes of harvested agricultural plants?

3.2 Europe's current high level of meat production would not be possible without high levels of protein imports, even though a large proportion of agricultural yield is already currently used as animal feed. In Germany, for example, this accounts for almost a staggering two thirds of the total harvest, namely almost all the grassland, which of course cannot be used directly to feed people, and 60% of both maize and cereals[15]. The second main use of the harvest in terms of volume is not plant-based food but rather the production of technical energy (maize for biogas, rapeseed for biodiesel, and cereals and sugar beet for bioethanol). The direct use of crops as food only comes in third place. The plant-based food consumed in Germany – mainly bread cereals, potatoes, sugar, rapeseed oil and field vegetables – accounts for only 11% of total crop production.

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13 EESC resolution adopted at the plenary session on 24 March 2022, OJ C 290, 29.07.2022, p. 1.

14 https://www.consilium.europa.eu/media/54773/20220311-versailles-declaration-en.pdf.

15 In 2017, the agricultural used area in the EU (27) was 178.7 million hectares: of this, 105.5 million ha were arable land, of which 63% (i.e. 66.8 million ha) was used for animal feed (https://de.statista.com/statistik/daten/studie/1196852/umfrage/landwirtschaftliche-flaechen-in-der-eu-nach-nutzungsart/).

3.3 Moreover, 93% of imported plant proteins are used as animal feed. It is these imports and the scale and intensity of meat production that have become the subject of many debates in society in recent years.

3.4 Two findings should be anticipated: firstly, in the EU, there is little shortage in the protein supply in the (plant-based) food sector itself, but rather and more importantly in the feed sector. Secondly, it will not be possible to fully substitute the high level of protein imports with European production without triggering profound consequences for other sectors of agricultural production.

3.5 After all, there is an absolute limiting factor: the agricultural area available. Although both conventional and organic farming are continuously taking innovative steps to increase productivity, they too are reaching their limits in terms of volume. The association for the oilseed processing industry in Germany (OVID) therefore concludes in an in-depth analysis that the supply channels of these protein sources must continue to be secured, since complete self-sufficiency with domestically produced protein remains unrealistic[16].

3.6 These fundamental statements should not be misunderstood. There are many good reasons to actively encourage more protein and oil crops to be grown in the EU: they fix nitrogen in soil, reduce the need for mineral nitrogen, improve soil quality and fertility, and make a positive contribution to climate change mitigation (e.g. reduced transport needs, less deforestation and less use of resources). Extended crop rotations reduce the prevalence of pests and are good for biodiversity. Currently, protein crop cultivation only accounts for a very small proportion (around 3%) of the agricultural area. As such, expanding this cultivation, while highly advisable, would inevitably come at the expense of other types of cultivation, e.g. other food or energy crops, or would conflict with, for example, other nature conservation measures.

Current trends

3.7 It is therefore advisable to start by identifying and analysing trends that could in the future affect livestock farming and animal nutrition and thus protein needs and quality.

3.7.1 Firstly, there is already a change in consumer behaviour and consumption patterns. More and more consumers are reducing their consumption of meat or giving it up entirely. The high consumption of meat in Europe is now also being brought into question for nutritional reasons. Meat consumption has already decreased in some Member States[17]. This can clearly be seen not only in statistics, but also on supermarket shelves, where there has been a visible increase in the amount of meat substitutes produced from protein crops.

3.7.2 Another trend can be described as "less but better quality meat": there is an increase in premium product ranges that put more emphasis on animal welfare and local produce, which has an impact on animal feed. This is leading more and more consumers to take an interest in how animals are reared, whether they are, for example, fed locally produced and/or non-GMO feed,

16 OVID, *Eiweißstrategie 2.0*, 2019.

17 In Germany, pork consumption per inhabitant decreased from 39.8 kg to 31 kg between 1995 and 2021.

whether they have access to grazing, and so on. There is already a high level of differentiation in the EU in this regard.

3.7.3 This trend used to be considered a small niche area, but a major shift seems to be underway: many large supermarket chains in several Member States have already gradually increased animal welfare and environmental performance requirements for their fresh meat products. More radical changes are in the pipeline: from 2030, some major discount stores will source their full range of fresh meat only from farms providing outdoor access or optimal rearing conditions. This drive is targeting all livestock groups: cattle, pigs, chickens and turkeys.

3.7.4 The increase in organic farming that is planned or already underway in the EU will also have an impact on feed supply (and soya imports). Up until now, organic livestock farming has increased by 10% a year according to the European Commission. The Farm to Fork Strategy's goal of making 25% of farming organic will add further impetus to this if markets evolve accordingly, to which the CAP aims to contribute. As only 6% of soya beans worldwide are marketed as non-GMO, farmers need to look for alternatives and/or increase on-farm feed production.

3.7.5 Significant changes can already be seen with milk as well: in many Member States, the food retail industry requires dairies to produce milk and dairy products without using GMO cow feed. As a result, in Germany, for example, soya meal is no longer used as feed in around 70% of milk production. The market is starting to differentiate between products, e.g. meadow, hay and mountain milk. Nevertheless, dairy products will continue to be a vital source of protein in the future and accessible to everyone as part of a balanced diet for all age groups.

3.7.6 In this regard, it is worth remembering the EESC's information report on *Benefits of extensive livestock farming and organic fertilisers in the context of the European Green Deal*[18], which not only recognises the particular importance of extensive livestock farming (based on permanent meadow and pasture) for biodiversity and other environmental and agricultural services, but also states that its role "in providing sustainable, healthy, safe and excellent food is key, particularly with a growing world population." Another Committee opinion points to the need to take greater account of "the role of pastures/ clovers as an important source of protein for ruminants"[19].

3.7.7 Another, completely different development which can have disastrous economic consequences for agriculture, traditional livestock farming and the whole agri-food system of this sector, is the development of so- called "cultured meat", which, however, has nothing to do with meat, but is an industrial product manufactured in reactors. This trend does not come from either consumers or farmers, but from large multinationals such as Cargill, Tyson Foods and Nestlé. They are researching or developing practices to produce cultured meat in industrial reactors. Their argument is that, what farmers have always done throughout the history of mankind by

18 EESC information report on the *Benefits of extensive livestock farming and organic fertilisers in the context of the European Green Deal*.

19 EESC exploratory opinion requested by the French presidency of the Council on Food security and sustainable food systems, OJ C 194, 12.5.2022, p. 72.

practising traditional livestock farming (namely growing cells), they can do in a reactor using much less land, while the doubt about water saving and other resources used remains, as do the unknowns relating to "quality" and related production costs. The EESC calls for a broad societal debate to be launched regarding concerns about this potential development and its negative consequences for livestock farmers and the meat production chain, a potential source of damage to the economies and employment levels of all Member States, and to the European Union as a whole.

Policy responses

3.8 There are now clear policy responses, some of which go even further in terms of content than the Farm to Fork Strategy and which have also been drawn up as part of a completely different social debate. In Germany, for example, the federal government set up a Commission on the Future of Agriculture (ZKL) in July 2020 consisting of 32 members from very diverse social groups, including traditional farmers' associations and academia. The goal was to develop a vision for the future of the agricultural and food system that would be accepted by a broad range of society. The recommendations were adopted by unanimous agreement and published in June 2021. They all follow the same principle: the most effective and sustainable way of improving the agricultural sector's environmental and ethical responsibility, including in terms of animal welfare, is to find ways to remunerate more sustainable production methods, thereby making them economically viable, by introducing new instruments.

3.9 For the livestock farming sector, the ZKL follows the recommendations of the Commission on Improvements in Livestock Farming (Kompetenznetzwerk Nutztierhaltung), which was set up by the German Federal Ministry of Food and Agriculture. The commission's proposals were published in February 2020[20] and set out a transformation strategy to transform livestock farming, with a substantial increase in animal welfare levels. This includes financing by means of taxes or duties combined with higher market prices and a payment linked to a mandatory animal husbandry label with set husbandry standards, which the commission believes is crucial to open up economic opportunities for the farmers concerned. This transformation strategy should secure the livelihood of livestock farms while reducing livestock numbers.

3.10 In conclusion, current forms of livestock farming in Europe differ, sometimes fundamentally, in terms of both demand for imports (mainly soya) and the regional impact on the environment. While more traditional or extensively environmental, land-based farming methods mostly use regional resources and feed, have a manageable environmental impact and are sometimes even indispensable for the preservation of cultural landscapes, the current and growing volume of intensive livestock farming is putting a strain on the regional environment and – despite already high demand for arable land in the EU – largely uses imported feed, which has a major impact in the countries where it is grown (e.g. contributing to global deforestation, climate change and social upheaval).

3.11 An important part of the European protein strategy must therefore be to make livestock farming as a whole compatible with EU and UN objectives regarding European and global food security,

20 https://www.bmel.de/SharedDocs/Downloads/DE/_Tiere/Nutztiere/200211-empfehlung-kompetenznetzwerk-nutztierhaltung.html.

supply autonomy and sustainability. Increased protein production in the EU is part of this but, globally, a trend in which the global average per capita consumption of meat and dairy products approaches the current levels of developed economies seems incompatible with the UN SDGs. Livestock numbers need to be reduced.

3.12 In principle, the ZKL has already carried out such an assessment of the current agricultural and food system as part of a social discussion process that merits further analysis by other EU Member States and the European Commission itself. On the one hand, this assessment recognises the indisputable positive benefits that agriculture provides to society, but on the other hand is critical of the basis for production developments in recent years and the impact they have had: "The flip side of this progress is seen in overexploitation of the natural environment, and of animals and biological cycles – up to and including seriously harmful effects on the climate. Added to this is the fact that farming faces an economic crisis. Various factors, not least policy decisions in the past, have led to farming practices that are no longer sustainable in environmental, economic and social terms. [...] Given the external costs of prevailing production forms, retaining today's agriculture and food system is not an option on environmental, animal ethics and economic grounds[21].

4. Calling for a sustainable protein supply and a greater role for oil crops

4.1 As Europe is increasingly recognising supply autonomy as a strategic goal, it is definitely worthwhile making comparisons to energy policy: dependence on imports should be reduced as far as possible and the focus should be on meeting needs sustainably with Europe's own resources.

4.2 Unlike in the energy sector, where new technologies (wind, solar, biomass, hydrogen, etc.) can offset the lack of fossil fuels, the global food sector needs to adapt production and consumption to the potential of the finite natural capital (mainly land, but also biodiversity). This must include prioritising the use of agricultural yield. Supplying people with plant products (cereals, fruits, vegetables, etc.) must be the top priority. Fortunately, there is no reason to worry about whether the EU will be able to meet this need for its own population. However, given the growing concern about world hunger, it should be borne in mind that this problem cannot be solved with meat production. On the contrary, feed production is in competition with food production, as is biomass produced for energy purposes.

4.3 This land use conflict is intensifying because, in almost all regions of the EU, agriculture faces sometimes considerable competition for land: according to EU calculations, the loss of agricultural land to urbanisation, construction, infrastructure, and so on, will reduce usable land by almost 1 million hectares by 2030.

4.4 Nevertheless, the EU is in a comfortable position by global standards: an EU agriculture based on the principles of the European agricultural model[22] will clearly be able to provide sufficiently high-quality plant products for all its citizens as well as large quantities of feed,

21 The ZKL's final report.

22 EESC own-initiative opinion on the Reform of the common agricultural policy in 2013, OJ C 354, 28.12.2010, p. 35.

though not enough to meet current demand. Moreover, given the likely breakdown in supplies of cereals from Ukraine and Russia to regions where hunger is rife, it must be considered whether we in the EU ought not use less cereal for feed (or fuel) so as to help resolve the growing global hunger problem and increase the protein supply.

4.5 When considering a European protein strategy, it must be borne in mind that ruminants (but not only them) can do something people cannot: they can digest grass. Grassland can even make up part of the diet of monogastric animals (pigs and poultry). It should therefore also be an essential component of a sustainable protein supply and gets far too little attention in current political discussions. The decision taken last year by the EU to reauthorise the use of meat meal and insect meal in animal feed may also help to reduce the proportion of plant-based protein in feed.

4.6 Recent studies by special bodies from Germany's Union for the Promotion of Oil and Protein Plants (UFOP) on the potential of rapeseed and legumes in cultivation and feed give cause for optimism that there is potential in terms of cultivation techniques to grow a lot more rapeseed and legumes, while at the same time significantly increasing crop rotations. Rapeseed and legumes could account for around 10% of arable land each, which for legumes, for example, particularly grain peas, broad beans, soya beans and sweet lupins, would mean more than double the current level. Therefore, more oil crops do not stand in the way of sustainable land use – quite the opposite. Nevertheless, this can only be done to the detriment of other types of cultivation.

4.7 However, the study also shows that current livestock needs cannot be met independently and that livestock numbers need to be reduced in order to move closer to the objective of strategic supply autonomy.

4.8 The EESC therefore believes that there is an urgent need for the EU to carry out a study on the Europe-wide potential of protein and oil crops that could be grown within the EU's borders. The study must take into account the sustainability of land use (crop rotations, soil fertility, including biodiversity). The outcome of the study should then be used to identify the land required for a healthy, plant protein-based diet for Europe's citizens. It will then be possible to determine what remains for animal feed (or for energy purposes) and thus how much still needs to be imported for a livestock farming sector that is geared towards sustainability and animal welfare while remaining within European and global ecological limits. The European protein strategy must then also determine how it will affect existing trade agreements (e.g. Mercosur) and how to protect EU farmers who produce sustainably from imports deriving from unsustainable production.

4.9 The EESC thinks it important to stress that the oil originating from oil crop cultivation of 10% of EU arable land could lead to self-sufficiency in terms of tractor fuel if just used for this purpose. The EESC has already pointed out in previous opinions[23] that it considers it useful to set up a specific programme for the use of non-esterified (i.e. pure) vegetable oils in agricultural machinery rather than relying on a blend with diesel. However, the use of B100 type fuels

23 EESC opinion on the use of energy from renewable sources, OJ C 77, 31.3.2009, p. 43.

(100% vegetable oil esterified) should also be considered. The resulting oil cake[24] makes for excellent protein feed (the same is true of waste from alcohol production).

4.10 Some Member States – for very different reasons – are already working on reducing livestock numbers (e.g. the Netherlands). This can be regulated or organised through market-based instruments. In addition to clear environmental and animal welfare standards, the EESC primarily advocates market-based solutions that create conditions for establishing new regional value chains that are self-sustaining and do not permanently depend on support. At the same time, they should open up opportunities for all livestock farms if possible. They must also, as far as possible, enable all EU farmers to produce sustainably and have a secure livelihood. This requires protection against unfair competition and unfair trading practices, which involves boosting farmers' market power in the transformation towards a global sustainable food system.

4.11 All of this shows once again that a sustainable EU strategy for plant protein and oil must consider the whole agricultural and food system; an isolated cultivation strategy will not help.

4.12 Market mechanisms must be designed in such a way that they reflect the real social and environmental costs. Market failures can be addressed by state interventions based on facts and science that aim to optimise the trade-off between costs and benefits for society, while taking into account all interests.

Brussels, 27 October 2022

Christa Schweng
The president of the European Economic and Social Committee

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24 When rapeseed is pressed, around 1/3 becomes oil and the other 2/3, oil cake.