



Position and views on EU plant protein strategy and Circular Agriculture

European Protein: part of solution for the future

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Introduction

The production and sourcing of plant protein is of crucial importance for food and feed production. The European Union (EU) imports most of its current protein need from third countries. This dependency needs reflection in the light of global trade policy developments, as well as different regional views with respect to food and feed safety demands and diverging EU policy on breeding innovations (genetically modified organisms – GMO- and new plant breeding techniques - NBTs) and maximum residue levels (MRLs) for plant protection products. Recently the European Commission (EC) issued a report on the development of plant proteins in the European Union¹. This report outlines examples of protein production in Europe and is meant to incentivise EU Member States to enhance availability of EU-grown proteins.

At the same time there is an increased interest in circular agriculture. The recent vision of the Dutch Ministry of Agriculture² for instance is primarily based on this principle. The Dutch government is focussing on closing the (circular) mineral loops in agriculture at the smallest geographical level; produce locally what can be done locally and use international sources when needed.

Soybeans, rapeseeds and sunflower seeds are examples of protein-rich plants. All are relevant for a number of different applications ranging from food, feed, oleochemical and biobased products to biofuels. Promoting the production of European proteins, the following needs to be considered.

Three markets to consider

The above report of the EC discusses the perspective of reducing EU-dependency on imports of plant proteins for three markets.

Conventional feed: limited growth prospects for EU-grown plant proteins.

Premium feed: because of the increased awareness of the consumers different premium markets segments have emerged in the EU. This creates economic opportunities for EU-grown feed.

¹ https://ec.europa.eu/agriculture/cereals/development-of-plant-proteins-in-europe_en

² <https://www.rijksoverheid.nl/documenten/beleidsnota-s/2018/09/08/visie-landbouw-natuur-en-voedsel-waardevol-en-verbonden>



Food: within the food markets, meat and dairy alternatives are continuously growing. The report concludes that there is a growth in relative competitiveness of EU-grown protein crops versus other crops and non-EU plant proteins.

We believe that the analysis above is relevant and that the trends indicated are indeed likely to continue. This offers opportunities for EU farmers. However, whether environmentally responsible production can deliver the right price and profit will be determining factors in the end. New Plant Breeding Techniques (NBTs) can play an important role for a more sustainable agriculture and to higher protein self-sufficiency in Europe. EU farmers need the opportunity to make use of these NBTs. The EU GMO legislation will have to be amended for this. Besides protein, oilseeds also contain oil. Farmers and other economic operators in the value chain depend on a profitable demand for these two components. Farmers can only viably produce plant protein if the oil can be used in other applications, including biofuels. The annual EU production of rapeseed for example has reached 20 million tons, driven by the increased demand for biodiesel in combination with rapeseed meal being an important source of EU-grown protein-rich feed. The growing amount of fallow land in the EU indicates that crop production in the EU is under pressure. Therefore there is a direct link between the EU Protein Strategy and the Renewable Energy Directive and the Common Agricultural Policy. Circular agriculture is only possible with an integral approach of these policies.

The EU-grown proteins will never completely replace imported proteins. The current EU-plan should hence not be used to mislead about Europe's ability to be self-sufficient. The EU can certainly grow more protein crops, but it is not realistic to consider that EU-grown proteins will effectively replace imported proteins. It is hence important to continue the work on sustainability of imported protein crops at a global level. We believe that a transition towards more EU-grown proteins or non-GM proteins should be developed by market demands and not via government subsidies and/or regulations.

Circular agriculture

We agree with the current ideas of reorganising parts of the current food systems as suggested in the Dutch Ministry of Agriculture's vision on circular agriculture, but the international perspective should prevail at all times. Circular agriculture should not be used as a reason to promote protectionism and unfounded overvaluation of local production. We should work together on stimulating sustainable production in those areas where this is necessary. In the meantime this serves reaching common sustainable development goals (SDG's) of the United Nations around 'zero hunger' and 'no poverty'.

In an earlier report³ issued by the Netherlands Scientific Council for Government Policy (WRR), a *robust* food policy was promoted. Robustness within the food policy was defined as being able to

³ <https://www.wrr.nl/publicaties/rapporten/2014/10/02/naar-een-voedselbeleid>



deal with (unforeseen) changes. This is exactly what is at stake here. The EU has to be able to anticipate (unforeseen) changes whether caused by nature or by trade policy developments, by making optimal use of available protein sources within and outside Europe so as to fulfil the needs of its people.

Conclusion

- We welcome the European Commission's European Protein Strategy and the Dutch Ministry of Agriculture's Vision on Circular Agriculture. We agree and see the need for continuous evaluation of our supply chains. The world we live in is changing and we (Europe, the Netherlands) need to adapt. This also relates to our protein supply.
- We think it is good to study the developments (and size) of the three different protein markets (conventional feed, premium feed and food) in more detail. And we need to acknowledge that there is only a business case for protein crops production and processing when there is sufficient demand for both the proteins and the oils that these crops deliver.
- We need to acknowledge that there is a direct link between the EU Protein Strategy and the EU Renewable Energy Directive and the EU Common Agricultural Policy. Circular Agriculture is only possible with an integral approach.
- The current plans should not be used to mislead about Europe's ability to be self-sufficient. The EU can certainly grow more protein crops, but it is not realistic to expect that EU-grown proteins will effectively replace imported proteins. We believe that a transition towards more EU-grown proteins or non-GM proteins should be developed by market demands and not via government subsidies and/or regulations.
- New Plant Breeding Techniques (NBTs) can play an important role for a more sustainable agriculture and to higher protein self-sufficiency in Europe. EU farmers need the opportunity to make use of these NBTs. The EU GMO legislation will have to be amended for this. We call upon the Dutch government and the EU to initiate a legislative change that provides innovation-friendly rules.
- It is not realistic to consider that EU-grown proteins will effectively replace majority of all imported proteins. The work on sustainability of imported protein crops at a global level needs to be continued, so as to reduce the impact EU-imports of these commodities on deforestation. We have to stimulate the sustainable developments and link these to the SDG framework. This should build on initiatives taken both at public and private (industry and NGO) level.

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