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SUSTAINABLE FOOD SYSTEMS IN THE LIGHT OF THE LEGAL AND ECONOMIC CONDITIONS OF THE COMMON AGRICULTURAL POLICY

Abstract

The purpose of this paper is to formulate a preliminary assessment of the selected solutions of the Common Agricultural Policy as to whether they are adequate from the perspective of the objectives of the SFS. Sustainability of food systems has become a complex process, dependent on a number of environmental, economic, and social factors. The authors assess that the instruments for supporting Sustainable Food Systems included in the national strategic plan are adequate to the goals of these systems, but some reservations can be raised about them. In particular, in addition to measures that are certainly beneficial and consolidating (e.g., supporting the reduction of antibiotic use in livestock production and pesticide use in crop production), the national strategic plan lacks larger-scale instruments (important from the point of view of the big picture) to support, for example, the introduction of resource-efficient and climate-resilient production, the promotion of a healthy and sustainable diet, the wider introduction of quality food (not only organic), the reduction and combating of food waste, the proper storage of food, or the reduction and management of waste generated in the food chain. The relative nature of the conditionality mechanism remains a shortcoming.

KEYWORDS

agricultural law, sustainable food systems, common agricultural policy, agricultural activity

SŁOWA KLUCZOWE

prawo rolne, zrównoważone systemy żywnościowe, wspólna polityka rolna, działalność rolnicza

1. INTRODUCTION

The subject of consideration is Sustainable Food Systems (SFS) in light of the legal and economic conditions of the Common Agricultural Policy (CAP). The expression "sustainable food systems" encompasses systems that ensure food safety and food security for all in a way that does not threaten the economic, social, and environmental foundations of this security for future generations.[1] The determinants of the Common Agricultural Policy are defined by various legal acts, in particular Regulations 2021/2115,[2] 2021/2116,[3] 2021/2117,[4] as well

[1] HLPE, Food losses and waste in the context of sustainable food systems, Roma 2014; Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Farm-to-Fork Strategy for a Fair, Healthy and Environmentally Friendly Food System, COM/2020/381 final, https://www.europarl.europa.eu/news/pl/headlines/society/20200519STO79425/stworzenie-zrownowazonego-systemu-zywnosciowego-strategia-ue (accessed 15 June 2023), hereinafter referred to as "Farm-to-Fork Strategy".

[2] Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 laying down the rules on support for strategic plans drawn up by Member States under the common agricultural policy (CAP strategic plans) and financed by the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No. 1305/2013 and (EU) No. 1307/2013 *PE/64/2021/REV/1*, OJ L 435, 6 December 2021, pp. 1-186, hereinafter referred to as Regulation 2021/2115.

[3] Regulation (EU) 2021/2116 of the European Parliament and of the Council of 2 December 2021 on the financing, management, and monitoring of the common agricultural policy and repealing Regulation (EU) No. 1306/2013, PE/65/2021/INIT, OJ L 435, 6.12.2021, pp. 187-261, hereinafter referred to as Regulation 2021/2116.

[4] Regulation (EU) 2021/2117 of the European Parliament and of the Council of 2 December 2021, amending Regulations (EU) No. 1308/2013 establishing a common organization of the markets in agricultural products, (EU) No. 1151/2012 on quality schemes for agricultural products and foodstuffs, (EU) No. 251/2014 on the definition, description, presentation, labeling and protection of geographical indications of aromatized wine products and (EU) No. 228/2013 laying down specific measures in the field of agriculture for the outermost regions of the European Union

as the National Strategic Plan for the Common Agricultural Policy. In principle, all "interventions" should be part of this strategic plan and have an impact on the sectors that are defined in Regulation 1308/2013.[5] Sustainable food systems are referred to in various documents of a strategic nature, in particular, the European Green Deal,[6] and including the Farm to Table strategy.[7] Sustainable food systems in the EU are based on the goals formulated in the United Nations (UN) Agenda for Sustainable Development.[8]

The issue specified in the title has been considered by representatives of various sciences in the literature,[9] including foreign studies,[10] for example, in the field of agricultural economics.[11] However, it has not been elaborated in an exhaustive

PE/66/2021/REV/1, OJ L 435, 6 December 2021, pp. 262-314, hereinafter referred to as Regulation 2021/2117.

[5] Regulation (EU) No. 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organization of the markets in agricultural products and repealing Council Regulations (EEC) No. 922/72, (EEC) No. 234/79, (EC) No. 1037/2001 and (EC) No. 1234/2007, OJ L 347, 20 December 2013, p. 671.

[6] Communication from the Commission to the European Parliament, the European Council, the Council, the Economic and Social Committee and the Committee of the Regions, European Green Deal, COM/2019/640 final, hereinafter referred to as the European Green Deal.

[7] Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, Farm-to-Fork Strategy for a Fair, Healthy and Environmentally Friendly Food System, COM/2020/381 final, https://www.europarl.europa.eu/news/pl/headlines/society/20200519STO79425/stworzenie-zrownowazonego-systemu-zywnosciowego-strategia-ue (accessed 15 September 2020), hereinafter referred to as "Farm-to-Fork Strategy".

[8] Resolution adopted by the General Assembly on 25 September 2015 [without reference to the Core Committee (A/70/L.1)] 70/1 Transforming Our World: 2030 Agenda for Sustainable Development, http://www.unic.un.org.pl/files/164/Agenda%202030_pl_2016_ostateczna.pdf (accessed 29 June 2023).

[9] T. Srogosz, *Food systems in the context of the Sustainable Development Goals – some remarks in a time of pandemonium*, Public Law Review 2020, No. 6, pp. 24-37; K, Leśkiewicz, *Sustainable food systems in the context of the reform of the Common Agricultural Policy – legal aspects*, Przegląd Prawa Rolnego 2020 No. 2, pp. 75-85, B. Włodarczyk, *Prawne instrumenty ochrony środowiska i przeciwdziałania zmianom klimatu we Wspólnej Polityce Rolnej na lata 2023–2027*, Przegląd Prawa Rolnego 2022, No. 2, pp 11-26; A. Niewiadomska, *Key challenges related to smart village*, Przegląd Prawa Rolnego 2023 No. 1, pp. 11-23; A. Kapała, *The role of short supply chains and local food systems in the concept of food sovereignty and food democracy*, Przegląd Prawa Rolnego 2023 No. 1, pp. 117-138.

[10] See, i.e. *Healthy and Sustainable Food Systems,* Mark Lawrence, Sharon Friel (eds.), London 2019.

[11] Cf. M. Kwasek (ed.) *Z badań nad rolnictwem społecznie zrównoważonym*, Warsaw 2018; R. Grochowska (ed.) *Kierunki rozwoju rolnictwa i polityki rolnych – wyzwania przyszłości* (Synteza), Warsaw 2014; A. Kołodziejczak, *Modele rolnictwa a zróżnicowanie przestrzenne sposobów gospodarowania w rolnictwie polskim*, Poznań 2010. The issue of food systems and their sustainability was addressed, among others, in studies: B. Kneen (1993). *From Land to Mouth. Understanding the Food System*. Toronto: NC Press Limited, p. 144; M.C.. Heller, G.A. Keoleian (2003). *Assessing the sustainability of the US food system: a life cycle perspective. Agricultural Systems*, 76(3); P. Ericksen (2008). *Conceptualizing food systems for global environmental change*

way, as food systems are transforming, and their objectives, structure, organization as well as scope of implemented activities are changing.

The choice of the research topic is justified by socio-economic considerations. In a broader context, sustainable food systems are one of the major challenges of the European Green Deal (hereinafter: European Green Deal), the EU's strategy for inclusive and sustainable growth. The European Green Deal aims to stimulate the economy, improve people's health, quality of life and care for nature. Issues of well-being and health of citizens and future generations are closely linked to access to healthy and affordable food. The European agri-food system sets global standards for food safety, security of supply, nutritional value, and quality.[12]

In order to achieve the goals of the European Green Deal and to secure the future of agriculture, support from the EU's agricultural policy is crucial. The new arrangements for the Common Agricultural Policy from 2023 to 2027 focus on ten specific objectives for social, environmental, and economic sustainability in agriculture and rural areas. A special role is to be played by strategic plans – at the national level, member states implement the CAP with their own plan, which combines a wide range of targeted interventions in response to specific needs and is designed to produce tangible results in terms of EU goals.

The Polish Strategic Plan for the Common Agricultural Policy 2023-2027 (PS CAP) addresses all major EU climate and environmental issues.[13] The new programming period will feature the so-called system of new "green architecture" consisting of mutually complementary mandatory requirements and additional voluntary incentives for environmentally and climate-friendly agricultural practices. The elements of the green architecture will be:

1) mandatory conditionality system,
2) voluntary climate and environmental schemes for farmers, the so-called ecoschemes,

research. Global Environmental Change, 18(1), pp. 234-245; J. Ingram (2011). A food systems approach to researching food security and its interactions with global environmental change. Food Security, 3(4), pp. 417-431; S. Kowalczyk (2010). Globalization of agribusiness: specifics, dimensions, consequences. Issues in Agricultural Economics, (2), pp. 6-26; R. Capone, H. El Bilali, P. Debs, G. Cardone, N. Driouech (2014) *Food system sustainability and food security: connecting the dots. Journal of Food Security*, 2(1), 13-22; J. Golebiewski (2019): *Food systems under circular economy. A comparative study of European Union countries*. SGGW Publishing House Warsaw, p. 271.

[12] Cf. Agriculture and the Green Deal https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/agriculture-and-green-deal_pl (accessed 1 August 2023).

[13] Strategic Plan for the Common Agricultural Policy 2023-2027 – short version. European Commission-approved Strategic Plan for the Common Agricultural Policy 2023-2027 – Common Agricultural Policy after 2020 – Gov.pl Portal (www.gov.pl), accessed 18 July 2023, hereinafter referred to as the National Strategic Plan.

3) pro-environmental support instruments – multi-year commitments and investments made under Pillar II.[14]

It is worth bearing in mind that in addition to the continuation of solutions already known,[15] the new CAP introduces solutions that increase the emphasis on investments for the environment and climate, animal welfare, or production based on the highest standards. An important addition to the catalog of farm support is the possibility of using support based on various forms of cooperation.

When it comes to economic considerations, it should be pointed out that the total amount of commitments under the CAP for 2021-2027 is EUR 386,602.8 million, of which 76.8% is allocated to spending in Pillar I, and 23,2% in Pillar II (rural development policy). Currently, agricultural spending in the European Union budget in 2021-2027 will account for 31%. The budget cost of the CAP as a percentage of gross national income (GNI) in the EU has therefore decreased from 0.54% in 1990 to 0.32% in the 2021-2027 projections.[16]

The purpose of the paper is to formulate a preliminary assessment of the selected solutions of the Common Agricultural Policy, whether they are adequate from the perspective of the objectives of the SFS. The structure of the considerations was subordinated to such a goal. First, it was necessary to establish the objectives of the SFS, then to identify the legal solutions for their implementation, showing their economic background.

2. SELECTED ASPECTS OF BUILDING SUSTAINABLE FOOD SYSTEMS (SFS)

Sustainable food systems are included in the European Union's major strategies. The EU food policy has been oriented towards achieving the UN Sustainable Development Goals.[17] In particular, it is expected to contribute to climate change mitigation. On the one hand, the Common Agricultural Policy should ensure affordable, safe and tasty food, an adequate standard of living for farmers and

[14] J. Gierulska (2022): *"Green Deal" in agriculture - what is the Polish plan?* Pomorski Thinkletter No. 3/2022: *The green transformation of Polish agriculture - meaning, philosophy and paths to the goal*, pp. 94-98.

[15] Among them: young farmers' bonuses, the LEADER initiative, and farm modernization support.

[16] CAP funding | Topical notes on the European Union | European Parliament (europa.eu) (accessed 18 July 2023).

[17] Resolution adopted by the General Assembly on 25 September 2015 [without reference to the Core Committee (A/70/L.1)] 70/1 Transforming Our World: 2030 Agenda for Sustainable Development, http://www.unic.un.org.pl/files/164/Agenda%202030_pl_2016_ostateczna. pdf (accessed 19 July 2023).

protect natural resources. On the other hand, it is about ensuring food security, responding to global market fluctuations and price volatility, as well as maintaining rural development in the EU.

Climate protection related to reducing atmospheric emissions of greenhouse gases poses ambitious challenges for current food systems to link agricultural production with a greater commitment to resource conservation and biodiversity. It is assumed that "In doing so, the characteristic of sustainability can be applied to all aspects of production, resource use, production techniques and methods, substances used, waste generation and management, atmospheric emissions, or consumption. The result of such a composition should be a product – food, allowing to meet food security needs".[18] As indicated by the National Strategic Plan for the Common Agricultural Policy 2023-2027, in the section "Strategic Declaration", a total of about 1.4 million farms are identified in Poland, with the main sectors being dairy, cereals, pig breeding, poultry and horticulture. In particular, agriculture is characterized by a diversity of production and economic potential, with a large share of farms of small economic size. There are significant income disparities. It was also pointed out that water shortages and surface water pollution are observed. Despite upward trends, the use of plant protection products remains below the EU average. Rural areas still lack access to modern social and technical infrastructure. A progressive aging of the population is evident. The majority of businesses are associated with the agricultural and forestry services, in the processing and tourism sectors. The strategic plan is intended to support the sustainable development of Polish farms, the processing sector, and the improvement of living and working conditions in small rural towns. In addition, the CAP is intended to serve sustainable farming methods, friendly to the climate and the environment; protecting water, soil and air, and biodiversity.[19]

First of all, bearing in mind the definition of food systems mentioned at the beginning of the discussion, it is crucial to determine which of the actions adopted in the National Strategic Plan directly serve to ensure food security and nutrition, taking into account the economic, social and environmental aspects of sustainable and balanced food chains. The objectives identified in the National Strategic Plan can be divided by the object of impact – into the economy, society and the environment, as follows:

1) Economy – supporting decent farm incomes and resilience across the Union to enhance food security, increasing market orientation and competitiveness, including a greater focus on research, technology and digitization, improving farmers' position in the value chain,

[18] K. Leskiewicz, *Sustainable systems*..., p. 80.

[19] Strategic Plan for the Common Agricultural Policy 2023-2027 – short version, p. 5. (European Commission-approved Strategic Plan for the Common Agricultural Policy 2023-2027 – Common Agricultural Policy after 2020 – gov.pl Portal (www.gov.pl) (accessed 18 July 2023), hereinafter referred to as the National Strategic Plan.

2) Environment – contributing to climate change mitigation and adaptation, as well as sustainable energy production, promoting sustainable development and efficient management of natural resources such as water, soil, and air, contributing to biodiversity conservation, enhancing ecosystem services, and protecting habitats and landscapes,
3) Society – attracting young farmers and facilitating rural business development, promoting employment, growth, social inclusion, and local development in rural areas, including bioeconomy and sustainable forestry, improving the response of EU agriculture to societal needs for food and health, including safe, nutrient-rich and sustainable food, as well as animal welfare.

Due to the framework of the study, selected aspects of the indicated areas of CAP support will be the subject of comments. It is worth noting that at the stage of formulating strategic plans, the need for a more ambitious approach to the specific objectives of the Common Agricultural Policy related to the environment and climate[20] was emphasized. Indeed, the areas mentioned are to constitute specific "areas" of impact, while maintaining the productive function of agriculture closely linked to the elementary *right to food* and *access to food*. Reference to this function can be seen in the delineation of the conceptual framework of agricultural activity in Article 4(2) of Regulation 2021/2115. The EU legislator indicates that in the concept of agricultural activity, Member States should include contributing to the provision of public and private goods by means of at least animal husbandry or cultivation, or maintaining agricultural land in a condition that makes it suitable for grazing or cultivation, without taking preparatory measures beyond the use of ordinary agricultural methods and ordinary agricultural equipment. Thus, agricultural activities should contribute to the provision of public or private goods, which presumably include agricultural products produced under the SFS. For years, in the solutions of the Common Agricultural Policy, the production function has not been fundamental and exclusive. On the one hand, this is a shortcoming of the solutions that distorts the essence of the productive nature of the agricultural system, while on the other hand, it opens up opportunities for other functions of agriculture related precisely to the environment. Therefore, it is important that agriculture should retain the feature of productivity and not be reduced to merely maintaining agricultural land. This issue has been repeatedly addressed by various authors.[21] Already at this point, it is necessary to point out some inconsistencies in the formation of an approach to sustainable agricultural production. One should point out, for example, the mechanism of conditionality. The essence of conditionality for direct payments is the requirement for

[20] Paragraph 123 of the preamble of Regulation 2021/2115.

[21] See i.e. L. Costato, *Mulitifunzionalità dell'impresa agricola ed equivoci sull'agroalimentare: la PAC snaturata*, I Georgofili: Atti dell'Academia dei Georgofili, serie VIII, Vol. 11, Tomo II 2014, pp. 556-570.

cross-compliance and greening, and currently includes Good Agricultural and Environmental Condition of Land (GAEC) standards and Statutory Management Requrements (SMRs). Failure to comply with conditionality does not result in the loss of support but in a 3% reduction in support for various instruments. This solution, at first glance, may not be conducive to the efficiency of the entire support system and does not serve the consistent transformation of agriculture.

Summarizing the above considerations, the transition to a sustainable food system can bring environmental, health, and social benefits, as long as its requirements are fully implemented. The EU's goals in this regard are:[22]

1) reducing the environmental and climate footprint associated with the operation of the food system,
2) guaranteeing food security in the face of climate change and biodiversity loss,
3) strengthening the resilience of the EU food system,
4) ensuring that the EU leads the global transformation toward competitive "farm-to-table" sustainability,
5) enabling more fair economic returns (fair distribution among the various players along the food chain).

3. IMPLEMENTATION OF SUSTAINABLE FOOD SYSTEMS INSTRUMENTS IN THE NEW CAP FUNDING PERSPECTIVE

The 2023-2027 CAP is based on the approach of fulfilling ten specific objectives, which are also the framework for EU countries' CAP strategic plans. They combine targeted "interventions" that address specific needs and achieve EU-level goals. During the approval process, the European Commission assessed how each EU country's CAP strategic plan affects and complies with EU climate and environmental legislation and commitments.[23] As already mentioned, in Poland, financial support under the EU CAP for 2023-2027 will be allocated on the basis of the document entitled: Strategic Plan for the Common Agricultural Policy for 2023-2027.[24] The budget of the CAP SP is 25,125 billion euros. The

[22] Cf. Agriculture and the Green Deal, https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/agriculture-and-green-deal_pl (accessed 1 August 2023).

[23] Cf. CAP Strategic Plans https://agriculture.ec.europa.eu/cap-my-country/cap-strategic-plans_pl (accessed 1 August 2023).

[24] Strategic Plan for the Common Agricultural Policy 2023-2027, https://www.gov.pl/web/rolnictwo/plan-strategiczny-dla-wspolnej-polityki-rolnej-na-lata-2023-27 (accessed 1 August 2023).

funding of Pillar I, after the transfer of 30% from Pillar II, is 17,326 million euros, while the Pillar II allocation is 7,799 million euros.[25]

An analysis of this voluminous (1,257 pages) document allows us to conclude that among the objectives of the CAP there were two related to the creation of sustainable food chains:

1) improving the position of farmers in the value chain (specific objective SO3),
2) improving the responsiveness of EU agriculture to societal needs for food and health, (specific objective SO9).

In terms of the SO3 objective, the European Commission noted that "agriculture is characterized by a constant and low share of value added in the value chain due to high input costs, fluctuations in production, and the inclusion of new services".[26] The effect of the goal is to empower farmers through measures such as strengthening cooperation among farmers, increasing market transparency, and providing effective mechanisms to combat unfair trade practices.[27]

The CAP SP needs assessment and intervention strategies include the following needs:[28]

– stimulating joint activities among farmers in various forms of collaboration and cooperation (CS3.P1),
– supporting short/alternative value chains including those related to high quality manufacturing (CS3.P2),
– developing cooperation, improving competitiveness and innovation along the value chain (CS3.P3),
– supporting the development of organized forms of trade (CS3.P4),
– consulting, coaching, cooperation with leaders of the scientific and business communities (CS3.P5),
– promoting solutions to support supply contracts between farmers and the processing industry (CS3.P6),
– the use of digitization in access to financial services, information and improving the supply chain (CS3.P7).

In terms of priorities at the level of the CAP strategic plan, the first two needs received the status "critical (+++)", the next two "required (++)", CS3.P5 was "beyond prioritization" and the last two needs received the status "desirable (+)". In determining whether a need was included in the CAP strategic plan, the first

[25] Strategic Plan for the Common Agricultural Policy 2023-2027 – p. 42, https://www.gov.pl/web/rolnictwo/plan-strategiczny-dla-wspolnej-polityki-rolnej-na-lata-2023-27 (accessed 1 August 2023).

[26] Cf. Key Policy Goals of the CAP for 2023-2027, https://agriculture.ec.europa.eu/common-agricultural-policy/cap-overview/cap-2023-27/key-policy-objectives-cap-2023-27_pl (accessed 2 August 2023).

[27] Cf. cap-specific-objectives-brief-3-farmer-position-in-value-chains_en_0.pdf (europa.eu) (accessed 2 August 2023).

[28] Cf. Strategic Plan for the Common Agricultural Policy 2023-2027, pp. 45-46.

five needs were annotated "partially", CS3.P6 was annotated "yes" and CS3.P7 was annotated "no".

Objective SO9, on responding to societal needs for food and health, focused on the challenges of producing high-quality, safe, nutrient-rich, and sustainably produced food and on reducing food waste. It also emphasized the need to increase animal welfare and combat antimicrobial resistance in animal husbandry and highlighted the relationship between animal welfare, animal health, and foodborne diseases.[29]

The CAP PS, in assessing needs and intervention strategies, detailed:[30]

- supporting the reduction of antibiotic use in livestock production (CS9.P1),
- sustainable use of inputs and improved farm biosecurity (CS9.P2),
- animal food production with higher levels of animal welfare (CS9.P3),
- ensuring the availability of organic food produced in food quality systems (CS9.P4),
- raising consumer awareness of food production systems and product labeling (CS9.P5),
- support for the construction of producer groups within the framework of food quality systems and horizontal relations (CS9.P6),
- raising awareness among market participants to counter food waste (CS9. P7),
- raising farmers' knowledge of sustainable use of inputs and bioassurance (CS9.P8).

At the national CAP PS level, in terms of prioritization, needs CS9.P1-P3 and CS9.P6 were given the status "critical (+++)", CS9.P4 and CS9.P5 were given the status "required (++)", and the last two were placed "outside prioritization". Need CS9.P3 was included in the plan in its entirety (annotated "yes") and the remaining needs were included "partially".

Further analysis of the Polish PS of the CAP allows us to conclude that a variety of activities, or the so-called interventions, have been identified to support the implementation of the needs identified earlier, based on the results of the SWOT analysis. Thus, for Objective 3, on improving the position of farmers in the value chain, 20 specific interventions were envisaged, under 6 types of interventions classified into two forms of intervention.[31] For Objective 9, on responding to social needs for food and health, 21 interventions were envisaged to be implemented (3 of which are the so-called ecoschemes), under 7 types and 3 forms of intervention.[32]

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[29] Cf. https://agriculture.ec.europa.eu/system/files/2018-12/cap_briefs_9_final_0.pdf (accessed 2 August 2023).

[30] Cf. Strategic Plan for the Common Agricultural Policy 2023-2027, p. 49.

[31] Cf. Strategic Plan for the Common Agricultural Policy 2023-2027 – pp. 131-132.

[32] *Ibid*, pp. 275-277.

Due to the limited scope of the article, the evaluation of the solutions contained in the CAP SP focuses on the most important aspects from the perspective of sustainable food systems.

In the case of Objective SO3, there is an apparent emphasis on efforts to strengthen the vertical integration of small and medium-sized farms into the food industry and to improve the position of farmers in the food chain, or to promote cooperation between farmers (including joint ventures). This is in line with the farm-to-table strategy's priority of shortening food supply chains. Several interventions are dedicated to these needs, including perhaps the most interesting under "COOP(77) – Cooperation" (and well in line with the idea of ICZM):

- creation and development of producer organizations and agricultural producer groups (I13.2),
- promotion, information, and marketing regarding food produced under food quality systems (I13.3),
- development of producer cooperation within the framework of food quality systems (I13.4),
- cooperation of EPI Operational Groups (I13.5).

Three interventions to support the development of value chain cooperation should also be mentioned (I10.6.2, I10.7.1, and I10.7.1).

A smaller representation of interventions relates to increasing the scale of small-scale processing in the quality-food production sector, which is based on farms' own resources. It seems that stronger support for this segment of the agri-food market should facilitate faster development of local markets and farmers' direct outreach to consumers (including through the establishment of processing businesses by farmers, or agricultural retailing). There is also doubt that small and medium-sized processing plants will receive sufficient support for modernization that will bring them in line with the requirements of a greener and digital economy and strengthen their competitiveness in the market. It is not entirely clear what will be the share of the support (what financial instruments envisaged) for large processing companies for their modernization related to increasing environmental requirements ("Green Deal", "From Farm to Table", or GMO-free feed production). As you know, subsidizing these largest companies requires a lot of money, but at the same time can be crucial for the entire processing sector, or the economy more broadly, due to the large scale of production (and the volume of emissions generated).

It should be noted that for Objective SO9, the main challenge diagnosed in the SWOT analysis is to reduce the use of antibiotics and pesticides, especially in intensive agricultural production. This is, of course, in line with the European Commission's recommendations on the need to ensure animal welfare and reduce the use of antibiotics and pesticides. However, there seems to have been too much emphasis on this aspect in Goal 9 (or - too little attention to other issues). Several interventions correspond to these issues (including ecoschemes: I4.3, I4.4 and

I4.6). The issue of the need to provide adequate information to food consumers (also advocated by the EC) in the CAP SP is already less well represented in principle only through intervention I13.3. Promotion, information and marketing of food produced under food-quality systems (intervention I.7.3 applies only to fruit and vegetable producers). Support related to the implementation of the farm-to-table strategy is evident – activities and investments contributing to environmental and climate protection are represented by three interventions (I.7.5, I 10.2, I 10.4), as well as support for increasing the area of agricultural land covered by the organic farming system (I 8.11).

In both cases, support for fruit and vegetable producers and markets is strongly noted (in SO3 – 6 interventions and in SO9 – 4 interventions in the form of "Sectoral-fruits and vegetables").

In the opinion of the authors, a debatable issue that, unfortunately, cannot be developed further in this study is the number and adequacy of result indicators for evaluating the implementation of individual measures. Why, for example, only three indicators were proposed for the SO3 objective (R 10 R11 R39)? Why indicator R39 (Development of the rural economy. Number of rural enterprises, including bio-economy enterprises developed through CAP support) is also linked to Objective 8? Such a solution "blurs" the actual results obtained for Objective 3. The situation is similar for the result indicators for Objective 9 (R4, R6, R7 R29, R43, R44) – according to the authors, they do not allow to fully measure the effects of the implementation of all interventions under SO9. There is also the phenomenon of using a given indicator to assess the implementation of several objectives, while on the implementation of indicator R29 (Development of organic agriculture. Percentage of utilized agricultural area under CAP support for organic farming, broken down by maintenance and conversion) is influenced by only one intervention I.8.11 – Organic farming. However, it is worth noting that under this intervention, it is imposed on farmers to produce organically and appropriately allocate the harvest, at least 30% of which must be destined for sale or processing.[33] Already at this point, it can be pointed out that this solution is directed at supporting the supply of organic products both primary and processed and subsequently the share of these products in the food market. For years, organic farming has been one of the important instruments for the transformation of EU agriculture, but not sufficiently developed in Poland.

[33] Ordinance of the Minister of Agriculture and Rural Development of 17 April 2023 on the detailed conditions and detailed procedure for granting and paying organic payments under the Strategic Plan for the Common Agricultural Policy for 2023-2027, Journal of Laws of 2023, item 791.

4. CONCLUSION

The Common Agricultural Policy accounts for 1/3 of the total EU budget. Although this share has been steadily declining (in the 1980s it was 70%), it remains a key element of the financing of EU agriculture and as a result, the challenges it faces. Implementation of the new CAP has been taking place at national levels since 2023 with the help of strategic plans.

The considerations carried out allow us to formulate the conclusion that a comprehensive assessment of the sustainability of food systems is associated with the analysis of numerous phenomena – in economic, social, and environmental dimensions, at different scales (e.g., geographical and temporal).[34] Sustainability of food systems has thus become a complex process, dependent on a number of environmental, economic and social factors, which can be viewed from different perspectives. Many of them appear inside food systems (e.g., farmer relations, short supply chains, organic farming), and some exist outside of them (e.g., the issue of health care, or energy security). It should be remembered that the construction of these systems, however, is mainly based on the close link between agricultural production and instruments for combating climate change, restoring and protecting biodiversity from the impact of agriculture. Therefore, the current reform of the Common Agricultural Policy implies a greater focus on the results achieved in terms of climate and environmental protection, as well as the strengthening of efforts for organic farming, or the preservation of biodiversity. These measures – which are part of the pan-European EZ³ strategy – are particularly evident in the Polish CAP SP. Many interventions relate to more environmentally friendly agricultural production (ecoschemes). Further down the list, and consequently with less financial support, are the activities related to sustainable food systems (a total of 41 interventions under CAP objectives SO3 and SO9).

A detailed analysis of these support instruments makes it possible to conclude that the support is primarily aimed at agriculture, and less concerned with food processing (especially large-scale processing), storage, distribution, or consumption. Meanwhile, as defined by the UN Food and Agriculture Organization (FAO), "food systems comprise the entire range of actors and their interrelated value-added activities involved in the production, collection, processing, distribution, consumption, and disposal of food products from agriculture, forestry or fisheries and parts of the broader economic, social and natural environment in which they are embedded".[35] Policies to support and develop sustainable food systems should be comprehensive, not focused on selected subsystems (mainly agri-

[34] Cf. M. Adamowicz, A. Smarzewska *Model and measures of sustainable and balanced development of rural areas locally*, Zeszyty Naukowe SGGW w Warszawie, European Politics, Finance and Marketing No.1 (50), 2009, pp. 251-269.

[35] Cf. https://www.usda.gov/oce/sustainability/definitions (accessed 3 August 2023).

culture). With the recognition that the food system consists of the environment, people, institutions, and processes through which food products are produced, processed, and delivered to people, a holistic approach is needed in creating more sustainable food systems.

Another reflection is that the solutions suggested by the CAP SP are local in nature. On the one hand, it is important for the new CAP to be more flexible and pragmatic, on the other hand, the effects of implementing the solutions may further differentiate the situation of agriculture in individual member countries. Seeing the solution in local food and shortening marketing chains (food bought close to home, in small markets) is a familiar trend. Local systems can be effective, but it should be remembered that their essence is not exclusively to consume food only within a specific area. LGS needs efficiency, and efficiency is about maximizing the use of the resources at hand. To ensure food security (in the context of the growing global hunger problem), local systems are only part of the combined efforts necessary for us to produce nutrient-rich food in the future.[36]

In summary, the instruments for supporting SFS contained in the CAP SP are adequate to the objectives of SFS, but some reservations can be raised about them. The food system is a complex chain: from production, through processing, distribution and trade, to consumption and waste, which has a major impact on the environment, health, and food safety. The chain is made up of relationships between numerous actors.[37] In addition to measures that are certainly beneficial and consolidating (e.g., support for reducing the use of antibiotics in livestock production and pesticides in crop production to increase the resilience of the food system, or interventions under "COOP(77) – Cooperation"), the document lacks larger-scale instruments (important from the perspective of the big picture) to support, for example the introduction of resource-efficient and climate-resilient production, promotion of healthy and sustainable diets, wider introduction of quality food (not only organic), reducing and combating food waste, proper food storage, or reducing and managing waste generated in the food chain.

The discussion undertaken does not exhaust all the important aspects of SFM and its place in the CAP SP (for example, the amount and structure of financial outlays for interventions are not addressed). The EU's sustainable food economy strategy aims to protect the environment and provide healthy food for all while guaranteeing farmers' livelihoods. A final assessment of whether implementing

[36] Cf. https://www.wrp.pl/zrownowazony-system-zywnosci-co-to-jest/ (accessed 3 August 2023).

[37] Within the food system, a special role is played by the so-called food operators – a concept that took shape in the 1990s, as part of the concept of "From farm to table" assuming the influence of each entity – a link in the chain – on the safety of the final consumer (cf. Czarnecki J. (2022): *On the need for sustainable food systems,* https://www.kongresobywatelski.pl/pomorski-thinkletter/wszystkie-teksty/o-potrzebie-zrownowazonych-systemow-zywnosciowych/ (accessed 3 August 2023).

the CAP's tasks in the EU and a sustainable food system in Poland will make it more robust and resilient to future crises, such as pandemics or increasingly frequent natural disasters, will be possible after a certain period of implementation of the presented new CAP instruments.

REFERENCES

Adamowicz M., Smarzewska A., *Model and measures of sustainable and balanced development of rural areas locally.* Zeszyty Naukowe SGGW w Warszawie. European Politics, Finance and Marketing No.1 (50) 2009

Capone R., H. El Bilali, Debs P., Cardone G., Driouech N., *Food system sustainability and food security: connecting the dots*, Journal of Food Security 2014, 2(1)

Costato L., *Mulitifunzionalità dell'impresa agricola ed equivoci sull'agroalimentare: la PAC snaturata*, I Georgofili: Atti dell'Academia dei Georgofili 2014 serie VIII, vol. 11, Tomo II 2014

Czarnecki J., On the need for sustainable food systems 2022, https://www.kongresobywatelski.pl/pomorski-thinkletter/wszystkie-teksty/o-potrzebie-zrownowazonych-systemow-zywnosciowych/ (accessed 3 August 2023)

Ericksen P., *Conceptualizing food systems for global environmental change research*, Global Environmental Change 2008, 18(1)

Gierulska J., *"Green Deal" in agriculture - what is the Polish plan?* Pomorski Thinkletter No. 3/2022: The green transformation of Polish agriculture - meaning, philosophy and paths to the goal

Gołębiewski J., *Food systems under circular economy. A comparative study of European Union countries,* SGGW Publishing House Warsaw 2019, p. 271

Grochowska R. (ed.) 2014, *Kierunki rozwoju rolnictwa i polityki rolnych - wyzwania przyszłości (Synteza),* Warsaw

Heller M.C., Keoleian G.A., *Assessing the sustainability of the US food system: a life cycle perspective.* Agricultural Systems 2003, 76(3)

Kwasek M. (ed.) *Z badań nad rolnictwem społecznie zrównoważonym*, Warsaw 2018

Ingram J., *A food systems approach to researching food security and its interactions with global environmental change*, Food Security 2011, 3(4)

Kapała A., *The role of short supply chains and local food systems in the concept of food sovereignty and food democracy*, Przegląd Prawa Rolnego 2023, No. 1

Kołodziejczak A., *Modele rolnictwa a zróżnicowanie przestrzenne sposobów gospodarowania w rolnictwie polskim*, Poznań 2010

Kowalczyk S., G*lobalization of agribusiness: specifics, dimensions, consequences*, Issues in Agricultural Economics 2010, (2)

Kneen B., *From Land to Mouth. Understanding the Food System*, Toronto 1993: NC Press Limited

Lawrence M., Sharon F. (eds.) *Healthy and Sustainable Food Systems* edited by Mark Lawrence, Sharon Friel, London 2019

Leśkiewicz K., *Sustainable food systems in the context of the reform of the Common Agricultural Policy – legal aspects*, Agricultural Law Review 2020, No. 2

Niewiadomska A., *Key challenges related to smart village*, Przegląd Prawa Rolnego 2023 No. 1

Włodarczyk B.*, Prawne instrumenty ochrony środowiska i przeciwdziałania zmianom klimatu we Wspólnej Polityce Rolnej na lata 2023–2027*, Przegląd Prawa Rolnego 2022, No. 2

Srogosz T., *Food systems in the context of the Sustainable Development Goals - some remarks in a time of pandemonium*, Public Law Review 2020, No. 6