

Policy priorities for the plant-based fat sector in Europe: Perspectives of the European Margarine Association

In the wake of advanced economic development and growing population, global food demand is expected to further rise in the coming decades. The increased competition for the use of land, water and other resources to supply food, feed and non-food related goods (e.g. biofuels, biomaterials) will put more pressure on agriculture, as well as on the environment. More than ever, there is urgent need to foster more sustainable food systems. At the same time, we testify of a steady change in consumption patterns towards healthier diets, as consumers shift to more sustainably produced and nutritionally balanced foods.

We see the integration of more plant-based food in diets (in replacement of foods from animal origin) as part of the solution to respond to the aforementioned challenges. Several national nutrition guidelines, alongside the recent IPCC report, recommend stepping up plant-based food consumption, in that regard. Yet, plant-based foods, including plant-based fats, are not yet properly recognised within the current EU agri-food policy/legislation. There is a lot of EU legislation protecting the production, sales and marketing of foods from animal origin (dairy, meat, fish, etc.) The European Margarine Association (IMACE) thus calls for a strong, science-based EU policy framework that supports this emerging sector, while fostering sustainable, circular plant-based food value chains.

The environmental footprint of margarine is 3 times lower than the footprint of animal based fats (i.e. butter) and margarines provide also an important source of the healthy unsaturated fatty acids, omega 3 fatty acids and vitamins, contributing to good health.

Policy Priorities for IMACE

1. Fostering sustainable food systems

Sustainable plant-based food chains require an integrated, cross-sectoral approach that encourages environmentally-friendly practices along the value chain, from crop production to food waste and recycling. It is thus essential to elaborate a **comprehensive EU agri-food policy**, which would encompass two essential components.

- **Sustainable sourcing and production:** The plant-based fat industry is highly concerned to use ingredients from sustainable sources. We need to avoid and reduce negative environmental impacts related to food production, e.g. deforestation, harmful pesticide use, and so forth. The EU has already taken important steps towards fighting deforestation, as per the recent Communication on “Stepping up EU Action to Protect and Restore the World’s Forests”.

IMACE endorses this action and calls for closer collaboration and dialogue with stakeholders and countries worldwide to deliver tangible and meaningful results at the source.

- **Food First!** Crops are valuable raw materials and therefore they should be destined to high-value applications, first, i.e. in the food chain, so as to respond to basic human needs. Other value applications – such as feed, biofuels or biochemicals – should be considered secondly.

IMACE calls for a hierarchy of crop valorisation that gives priority food applications over other value outputs. A food waste hierarchy that would contribute to better valorisation of food and encourage high quality recycling.

2. Achieving a level playing field for plant-based foods

Plant-based foods are often presented as “*alternatives to...*”, “*imitation food*”, “*replacer ...*” which gives them to be seen as unauthentic and of lower quality, while they are expected to observe more legal requirements. In order to recognise their role in healthy diets, as well as in climate change mitigation, we need to work towards a level playing field for plant-based products. This includes three key measures.

- **Plant-based farming in the CAP:** The European Commission acknowledges the economic opportunities of cultivating plant-based ingredients for food consumption. To develop such potential, it is essential to support crop and plant farmers to the same level as animal farmers, through valorisation schemes based on the final application of their crops and production.

IMACE encourages policymakers to provide incentives to plant-based farming within the post-2020 Common Agriculture Policy (CAP).

- **Ruminant/non-ruminant Trans-Fatty Acids (TFA):** TFA are considered harmful for health; hence, Regulation (EU) 2019/649 sets maximum levels for their presence in food. However, the Regulation only applies to non-ruminant or industrial TFA and excludes ruminant TFA (found in animal-based fats such as butter). This discrepancy creates unfair competition between plant-based and animal-based fat products. Most importantly, it distorts consumers’ perception of animal-based fats as being TFA-free; which is highly misleading, if not deceiving.

IMACE strongly calls for the same rules to apply to all sources of trans-fatty acids, whether of industrial and ruminant origin.

- **Stimulating the plant-based food sector:** Market development depends on demand and consumption habits. In order to sustain a variety of choice for the consumer, the EU needs to dedicate more efforts to educating consumers about plant-based foods (e.g. fats, proteins) in line with national nutrition guidelines, etc..

IMACE supports the need for EU-wide awareness raising campaigns targeting the characteristics of plant-based foods and their role in diets, as well as health impacts. Doing so, information conveyed to consumers should be based on scientific evidence and food safety principles, as developed and advised by the European Food Safety Authority (EFSA).

3. Implementing meaningful labelling requirements for plant-based fats

While EU food labelling legislation aims to better inform consumers to support healthier and/or sustainable choices, some requirements that bear on plant-based fats are little relevant, or may even misguide, consumers as to the content, origin and nutritional value of the food products.

- **Mandatory labelling of partially and fully hydrogenated vegetable oils (PHVO/FHVO):** Contrary to FHVO, PHVO releases TFA and is associated with heart diseases. Despite being phased out (as a consequence of above-mentioned Regulation (EU) 2019/649), producers are still required to label PHVO or FHVO on fats. Yet, consumers have a negative perception of PHVO and FHVO, and their health effects are often misunderstood.

IMACE invites EU policymakers to put an end to mandatory labelling requirements for hydrogenation.

- **Nutrient Profiles:** Different nutrient profiling schemes are applied across EU Member States, based on different criteria and methodology. Yet, if they intend to inform consumers about the nutritional value of foods, they are too often partial, over-simplified and do not educate them correctly to understand food and daily dietary needs (discriminating plant based products from animal based foods on non-objective and not science based grounds) .

IMACE stands for simple, rightful nutrition labelling, which takes into account the role of a food in a balanced and healthy diet (including realistic standard daily portions). The labelling should also focus on the positive nutrients (such as the unsaturated fatty acids and vitamins) that a food contributes to the overall diet.