

IMACE POSITION ON A SUSTAINABLE FOOD SYSTEM FRAMEWORK

The European Green Deal underlines the European Union's commitment to tackling climate and environmental-related challenges. In this context, the European Commission adopted the Farm to Fork Strategy, which acknowledges the importance of building sustainable, healthy and resilient food systems to achieve the climate neutrality goal.

The European Margarine Association (IMACE) welcomes the European Commission's commitment to move towards more sustainable food systems and to adopt a Sustainable Food System Framework (SFSF), which aims to establish a horizontal instrument to tackle current market issues and regulatory fragmentations which hinder the full and effective implementation of food sustainability policies. In order to develop a forward-looking framework fit for purpose, the following elements must be taken into account:

- **A set of general principles**

The SFSF should establish additional general principles, alongside the ones already defined by the Union treaty as well as stemming from the General Food Law¹, to underpin all existing and future food initiatives. In particular, the SFSF should be:

- **Holistic:** The SFSF should assess food products considering economic, environmental, social and health considerations to ensure food security and the competitiveness of the EU Food systems in the global market.
- **Science-based:** The SFSF should be based on sound, reliable scientific information and data, as well as on a robust impact assessment.
- **Harmonised:** The SFSF should be harmonised across Member States and avoid fragmentation at national and local level.
- **Inclusive:** The transition towards a sustainable food system framework should include the whole food supply chain actors, including the SMEs. The transition process will most likely come with financial, technical, and regulatory hurdles,

¹ The transparency principle, the protection of consumers' interests, and the precautionary principle.

therefore the SFSF should ensure that the whole food value chain is properly equipped and supported to undergo this transition.

- **Consistent:** The SFSF should be aligned with the EU food sustainability goals, including the shift towards more plant-based diets, as defined in the EU Farm to Fork Strategy.
- **Flexible:** the SFSF should allow for flexibility in crisis situations which require exceptional measures, such as during the COVID-19 crisis and the war in Ukraine.
- **Proportionate:** Food safety is the foundation of the current EU food policy, and ensures that food products placed on the EU market comply with precise criteria, guaranteeing the health of European consumers. A future SFSF could complement the food safety one, but should not jeopardise its implementation. Particular attention should therefore be paid to the interaction between these two frameworks.

- **A harmonised definition of sustainable food systems**

An EU-wide definition of “sustainable food systems” should be developed and would facilitate the understanding and implementation of the framework. It would define the sustainability requirements and coordinate actions by different food system actors along the value chain.

The definition should align as much as possible with current agreed international standards and definitions, such as the one by FAO²: “A sustainable food system is a food system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised”.

- **A harmonised legislative framework**

The development of a horizontal framework to harmonise food sustainability initiatives is an opportunity to address outdated legislations that disincentivise sustainable production and consumption, and to tackle market and regulatory hurdles that hinder access to sustainable

² [Sustainable food systems Concept and framework](#), FAO, 2018

foods. The EU's goal to shift towards more plant-based diets is hampered by several barriers, such as taxation (e.g. higher VAT rate for plant-based fats compared to their animal-based counterpart) and financial measures (e.g. subsidies to the animal-based sector under the Common Agricultural Policy). This distorts the market and makes plant-based fats less affordable for consumers, which is detrimental to the uptake of sustainable consumption patterns since margarine and spreads are associated with lower climate impact, water use and land use in the EU.³ **Therefore, IMACE calls for an EU legislative framework that creates a level-playing field.**

- **Minimum sustainability requirements common across food actors**

The minimal sustainability requirements should be clear, realistic, consistent, and science-based, providing food chain actors with the information, tools, and incentives they need to produce more sustainable food, setting a *common* reference for an equal assessment of products' sustainability. This is the reason why **IMACE strongly recommends against the establishment of sector-specific minimum mandatory criteria**, which would provide a fragmented understanding of the sustainability performance of foods and convey a distorted message to consumers, *de facto* preventing them from comparing products and choosing healthier, more sustainable options. Applied to margarine and spreads, sector-specific mandatory criteria would not allow the comparison between animal-based products and their plant-based alternatives, substantially hindering the shift towards more plant-based diets as set in the Farm to Fork Strategy.

IMACE also strongly believes that promoting sustainable consumption patterns requires looking at the role of food products in the context of an overall well-balanced diet, without putting a tag on specific products. For instance, the daily consumption of margarine (about 10g) provides a source of good fats and vitamins with a lower carbon footprint than butter and should thus have a place in a sustainable diet as the best fat option.

³ Liao, X., Gerichhausen, M.J.W., Bengoa, X. et al. Large-scale regionalised LCA shows that plant-based fat spreads have a lower climate, land occupation and water scarcity impact than dairy butter. Int J Life Cycle Assess 25, 1043–1058 (2020). <https://doi.org/10.1007/s11367-019-01703-w>

- **A holistic EU sustainability label**

Nowadays, consumers do not have access to information about the sustainability of food products in a uniform way across the EU, due to the lack of a common framework. The food industry has taken action and set up initiatives to inform on the sustainability of its products, but an EU-wide harmonised approach is missing. That's why IMACE welcomes the intention to set up an EU sustainability labelling framework, to provide consumers with a comprehensive overview of the impact of food products across the different sustainability pillars and guide more well-informed choices.

A future EU food sustainability labelling framework should facilitate consumers' understanding of the environmental, health and social impacts of foods, ensuring comparability across food categories. In this regard, the single sustainability impacts (e.g. environmental, nutritional) must remain separated to avoid diluting information that could ultimately mislead consumers' perception of foods (e.g. the environmental performance of a product is not linked to its nutritional value).

The sustainability of food products should be assessed on a science-based, holistic approach, which should ensure EU-wide harmonisation and application across Member States. Defining relevant sustainability parameters and methodologies, as well as collecting the necessary data, is thus a prerequisite for developing the framework. A dedicated EU body could be set up to take care of such assessment – considering its three main dimensions – and would act in close cooperation with the European Food Safety Authority (EFSA).

Based on the above-mentioned arguments, **IMACE supports Option 4.B** on the development of an EU general framework and of a mandatory harmonised EU sustainability label for all EU and imported food products.

- **Sustainable public procurement rules able to shape future-proof dietary patterns**

A transition towards more sustainable food systems and more plant-based diets requires a transition in dietary habits. Public settings have the potential to shape consumption patterns, some from an early age (e.g. schools).

Conclusion

Taking into consideration IMACE's above-mentioned recommendations would make an effective contribution to the creation of a sustainable food systems framework legislation that would place sustainability at the heart of EU food policy. IMACE looks forward to working alongside the food industry and EU policymakers to develop a sound, overarching framework that will support the transition towards more sustainable food systems.