

IMACE POSITION ON A SUSTAINABLE FOOD SYSTEM FRAMEWORK

Brussels, 5 July 2022

The European Margarine Association (IMACE) welcomes the opportunity to contribute to the public consultation on the Sustainable Food System Framework initiative. IMACE endorses the European Commission's intention to set up a horizontal instrument that could tackle current market issues and regulatory fragmentations which hinder a full and effective implementation of food sustainability policies.

IMACE's remarks on the Sustainable Food System Framework initiative

Alongside the input already provided directly in the survey, IMACE would like to raise the following points which are critical in setting up a comprehensive framework fit for purpose:

- **The need for a common 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 should align as much as possible with current agreed international standards and definitions, such as the one by FAO¹.
- **A comprehensive approach to sustainability.** A future sustainability framework should assess food products considering economic, environmental, social and health considerations.
- **A harmonised, science-based approach to sustainability.** 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

¹ “A sustainable food system (SFS) 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.” [Sustainable food systems Concept and framework](#), FAO, 2018

dimensions – and would act in close cooperation with the European Food Safety Authority (EFSA).

- **Push and pull measures should aim at levelling the playing field and making sustainable foods the default option.** The development of a horizontal framework to harmonise food sustainability initiatives is an opportunity to readdress outdated legislation that disincentivises sustainable production and consumption, and to tackle market and regulatory hurdles that hinder access to sustainable foods. The EU 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 make plant-based fats less affordable for consumers, which is detrimental to the uptake of sustainable consumption patterns, since margarines and spreads are associated with lower climate impact, water use and land use in the EU.²
- **Ensuring the growth and competitiveness of the EU.** The transition towards a sustainable food system framework will need to consider the role of food business operators, such as the margarine industry, both inside and outside the EU, to ensure the sector remains competitive. Sustainability requirements will therefore need to comply with international trade agreements.
- **Support to SMEs.** The transition towards a sustainable food system framework will most likely come with financial, technical and regulatory hurdles, especially for small and medium enterprises. The framework will therefore need to ensure that the whole food value chain is properly equipped and supported to undergo the transition.
- **Alignment across EU policies.** The objectives, targets and timelines of the FSFS with other food-related legislation and policy should be aligned to ensure a predictable regulatory environment that encourages innovation needed for sustainable food system.

² 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>

Of critical importance is the coherence between the food safety and food sustainability frameworks. 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 food sustainability framework 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.

IMACE's remarks on the public consultation survey

IMACE would like to take this opportunity to complement and expand on the answers provided in the survey. Specifically:

- **Question 2.** All actors are equally important in facilitating the transition towards more sustainable food systems. Succeeding in developing a framework of such a magnitude will require continuous dialogue and exchange between EU policymakers and stakeholders in the food value chain.
- **Question 9.** The uptake of more sustainable production and consumption patterns offers the chance to upgrade culinary habits, making them fit for the future. Plant-based foods – such as plant-based fats – play a key role in this, as they provide consumers with a healthier and more sustainable alternative to animal-based products (e.g. butter) that can be easily integrated in people's consumption habits.
- **Questions 16 and 17.** 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, with a view to providing consumers with a comprehensive overview of the impact of food products across the different sustainability pillars and guiding more well-informed choices. Such work would have ideally been performed before starting the development of specific EU legislation on the matter (e.g.

nutritional labelling and environmental labelling). However, given the ongoing status of the policymaking process, IMACE suggests finalising the vertical labelling schemes first - e.g., FOP labelling and green claims – before initiating works on the horizontal framework.

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). Any proposal on the matter should be preceded by a thorough stakeholder consultation and impact assessment.

- **Question 21.** Taxation should encourage consumption of sustainable foods, such as plant-based fats, backed by science-based arguments on their environmental and health benefits.
- **Question 22.** IMACE 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 is 10g and 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.

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.