IMACE POSITION ON A SUSTAINABLE FOOD SYSTEM FRAMEWORK

The climate crisis we are experiencing – exacerbated by the energy and food crises – exposed the vulnerability of European and global supply chains. Food systems play an important role in this regard, being a major driver of climate change[1,2], environmental degradation[3] and biodiversity loss[4], largely due to an overconsumption of animal-based products such as meat and dairy[5].

Accelerating the transition towards more sustainable and resilient food systems is therefore key to address today's environmental, economic and social challenges, and must include a shift towards more plant-based diets, also acknowledged in the EU Farm to Fork Strategy[6], the EU Beating Cancer Plan[7], and the EU Drivers of Food Security[8]. However, such shift requires deep changes in our production and consumption patterns, that must be supported by a sound EU regulatory 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. The SFSF offers an unique opportunity to build

[1] Crippa, M., Solazzo, E., Guizzardi, D., Monforti-Ferrario, F., Tubiello, F. N., & Leip, A. J. N. F. (2021). Food systems are responsible for a third of global anthropogenic GHG emissions. *Nature Food*, *2*(3), 198-209.
[2] Clark, M. A., Domingo, N. G., Colgan, K., Thakrar, S. K., Tilman, D., Lynch, J., ... & Hill, J. D. (2020) Global food system emissions could preclude achieving the 1.5° and 2°C climate change targets Science, 370(6517), 705-708.
[3] Global Land Outlook - Second edition, United Nations Convention to Combat Desertification, 27 April 2022
[4] Food system impacts on biodiversity loss: Three levers for food system transformation in support of nature, Chatham House, 2021
[5] Greenpeace. (2019). Feeding the Problem: the dangerous intensification of animal farming in Europe.
[6] EU Farm to Fork Strategy
[7] Europe's Beating Cancer Plan
[8] Drivers of Food Security

a regulatory framework that effectively accelerates the transition towards more sustainable food production and consumption patterns. In order to develop a forward-looking, fair and effective 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 Law[9], 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, 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

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[9] The transparency principle, the protection of consumers' interests, and the precautionary principle.

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 FAO[10]: *"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 clear vision with time-bound measurable targets?**

Next to the more holistic top-line definitions, the SFSF should also **set the foundations for a real transition that moves away from business-as-usual food** and ignites **a new sustainable way** of producing and consuming by introducing <u>a clear vision with timebound and measurable objectives to move towards</u> (eg moving away from intensive farming to more regenerative farming practices, transitioning towards more plant-based production and consumption, reducing food waste & food loss, …..). A clear direction (with smart targets) is needed to guide the industrial actors and Member States optimally, avoiding different ambitions and interpretations. The EU is perfectly placed to take the lead globally in this regard.

- **A harmonised legislative framework**

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[10] Sustainable food systems Concept and framework, FAO, 2018

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 current access to sustainable 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, CMO). 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.[11] **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** for food operators (primary sector, transformation and retail).

IMACE strongly opposes against the establishment of food sector/product category -specific minimum mandatory sustainability 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

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[11] 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

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.

- **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. Food procurement, in particular, has an enormous potential to forge more virtuous dietary habits, initiating bottom-up change in public settings (e.g. schools, hospitals, universities) that can then stimulate food system actors to take action in the private sector as well and towards consumers. It must therefore be a pillar of the plan to achieve the EU sustainability goals.

IMACE supports the set-up of minimum requirements for sustainable public procurement which promote a shift towards more plant-based diets, prioritising nutritionally relevant foods while not hindering food innovation. In this regard, it is important not only to increase the offer of fruit and vegetables, but also to expand and widen the offer of other whole plant-based foods, such as legumes, whole grains, seeds, and nuts, as well as plant-based alternatives to meat and dairy. A proper solution would be **to establish an EU-wide mandatory minimum threshold for plant-based food in public procurement** that Member States would need to comply with according to the specificities of each national and local contexts.

- **Governance**

The transition towards sustainable food systems needs to take place at all levels – from global to local. Many competencies related to foods and diets are national competencies, however, change must be triggered and driven at global and EU levels, helping streamline and harmonise the implementation at national, regional and local levels. Specific national initiatives or measures should however not distort the single market.

The role of the EU is key in guiding, coordinating and minitoring efforts across Member States, towards converging national initiatives to facilitate the transition. This could take the shape of National Food Sustainability Strategies for Member States to translate the provisions of the SFSF into national actions. A monitoring process should be put in place for the EC to keep track of progress, while a platform featuring the EC, the Member States and food system stakeholders should be established to foster the exchange of knowledge and best practices.

Such a platform would be all the more instrumental as it would give a voice to all stakeholders of the value chain, including farmers and emerging innovative food producers.

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.