

November 17, 2021

**Ms Claire Bury**

Deputy Director General  
DG SANTE  
European Commission  
By email

Dear Ms Bury,

IMACE is the **voice of the European margarine producers** for retail and business-to-business, representing more than 70% of the European sector. Committed to sustainable and healthy food systems, IMACE supports the creation of a favourable policy environment that lays the foundation for a responsible and innovative margarine and plant-based spreads industry.

Tackling the challenges of greatest concern to European consumers and communities requires legislative as well as voluntary actions from businesses. In this spirit, the margarine and plant-based spread industry has taken **decisive steps towards providing healthy and environmentally friendly products to consumers**. IMACE is therefore proud to sign the EU Code of Conduct as a milestone in the transition towards responsible business and marketing practices. Building on the achievements made in the last decades and aware of its role as representative of the industry, IMACE pledges to:

- **Endorse** the aspirational objectives of the Code (if applicable);
- **Promote and disseminate** the Code within its membership;
- **Encourage its members** to align their business and marketing practices to the aspirational objectives and targets of the Code;
- **Provide**, on an annual basis, **a report of its activities** in support of the Code.

IMACE is glad to support its members in their contribution to:

- **Healthy, balanced, and sustainable diets**, aligned with aspirational objective #1. The margarine industry contributed to this objective by investing in [product reformulation and fortification](#) as well as by ensuring transparent and clear communication to consumers.
- **A reduction of packaging waste** in line with aspirational objective #3. IMACE members are fulfilling this objective by choosing sustainable and safe packaging made of recyclable materials where possible.

- **A resource-efficient food chain**, aligned with aspirational objective #4. IMACE members have minimised the consumption of energy and natural resources in the production process thanks to the use of renewable energy as well as the reuse of by-products.
- **Healthier and more sustainable communities**, in line with aspirational objective #5. IMACE members help make this objective reality by supporting research in the sustainability and health of local communities as well as in innovation to accelerate the development of margarine and plant-based spreads which can meet today's challenges and demands.
- **Sustainable and responsible sourcing**, aligned with aspirational objective #7. IMACE members are committed towards responsible sourcing that refrains from the exploitation of people and the planet. IMACE is also part of the Roundtable on Sustainable Palm Oil and of the European Sustainable Palm Oil Advocacy Group.

Convinced that responsible business practices, environmental protection and social integrity are key to long-term success, IMACE is looking forward to contributing to the achievement of the sustainability and health goals of the EU Farm to Fork Strategy, the EU Green Deal, and the UN Sustainable Development Goals.

Kind regards,



**John Verbakel**  
President IMACE



**Siska Pottie**  
Managing Director IMACE