

IMACE POSITION ON A SUSTAINABLE FOOD SYSTEMS FRAMEWORK

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The Farm to Fork Strategy sets the EU vision to develop more sustainable, healthy and resilient food systems, which would directly contribute to reaching the Green Deal objective of carbon neutrality by 2050. The initiatives stemming from the Strategy will also be linked to other policies – e.g. Europe’s Beating Cancer Plan, Circular Economy Action Plan, EU Biodiversity Strategy – with the aim to make food production and consumption more sustainable. However, no overarching framework is currently in place to streamline such initiatives and make sure that their potential is used to the maximum to reach the EU sustainability and health goals.

The European Margarine Association (IMACE) welcomes the European Commission’s work on a Sustainable Food System Framework, and acknowledges the need for a horizontal instrument that could tackle current market issues and regulatory fragmentations which hinder a full and effective implementation of food sustainability policies.

IMACE is in favour of setting up a comprehensive framework, which should consider the following aspects:

- **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 to 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 taking into account economic, environmental and social considerations.

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

- **A co-creation process with food stakeholders.** Developing a framework of such magnitude will require continuous dialogue and exchange between EU policymakers and stakeholders in the food value chain, via, for instance, the setup of an EU platform. This would be instrumental to assess potential impacts, to set up proper mitigation measures during the transition period, to clearly define the role of food actors and public authorities as well as to establish shared, realistic and proportionate responsibilities.
- **Providing incentives to produce and consume sustainable foods.** The current EU food system can incentivise consumers and producers toward unsustainable foods, through mechanisms such as a higher VAT for plant-based margarines and spreads than for dairy butter in some Member States. This makes it less appealing to produce and to choose these products, 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 The development of a horizontal, harmonised framework to harmonise food sustainability initiatives is an opportunity to readdress outdated legislation that disincentivises sustainable production and consumption.
- **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 dimensions – and would act in close cooperation with the European Food Safety Authority (EFSA).
- **A mix of legislative and non-legislative measures.** A combination between legislative and non-legislative measures is the most appropriate way to enable the transition towards more sustainable food systems. The EU Code of Conduct could be a good

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>

starting point – aligned with the policy agenda – to develop a coherent, realistic action plan for the food industry.

- **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.
- **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 is looking 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.