

IMACE POSITION ON THE REVISION OF EU MARKETING STANDARDS

The European Margarine Association (IMACE) welcomes the opportunity to contribute to the public consultation on the Inception Impact Assessment on the proposal for a revision of EU Marketing Standards.

Marketing standards were developed to facilitate the smooth functioning of the EU single market, to keep food of unsatisfactory quality off the market, to provide consumers with essential information and to ensure a level playing field for all products. As the recent evaluation shows, marketing standards have been effective in reaching these objectives¹. However, the Farm to Fork Strategy acknowledges the need to move towards more sustainable food systems in order to overcome current environmental and health challenges. Plant-based diets play a key role in this transition. Therefore, marketing standards need to be adapted to be able to deliver on the EU sustainability goals.

IMACE strongly believes that it is essential to reflect changes in consumers' behaviour in the marketing standards legislation and align with the objectives of the Farm to Fork Strategy to promote healthier and more sustainable food production and consumption in Europe. For this reason, **IMACE is supportive of a revision of the EU Marketing Standards for modernisation purposes, as per option 3 of the Commission's Inception Impact Assessment.**

The revision of marketing standards for plant-based fats should address current hurdles that prevent the proper uptake of margarine and spreads. In fact:

- Current marketing standards **fail to reflect evolving consumption patterns, and do not cover the wide range of plant-based fats available on the market.** Citizens are aware of the importance of sustainable food consumption habits and are demanding healthier and more sustainable products. In response to the increased consumer interest in healthy and sustainable foods, the margarine industry further optimised the nutritional profile of its products by eliminating trans-fats, reducing saturated fats

¹ [Evaluation of marketing standards \(contained in the CMO Regulation, the "Breakfast Directives" and CMO secondary legislation\)](#), Commission Staff Working Document, 20.10.2020

while increasing unsaturated fats, and offering a wide range of products with different fat content. However, current marketing standards are based on a total fat content, without differentiating between healthy (unsaturated) and unhealthy (saturated) fats. Hence, **it is crucial to update the current terminology and provide a distinction in quantity and quality of fats.**

- Current marketing standards provide **little to no room for innovation**. Following increasing consumer demand, the margarine industry has invested heavily in research and innovation to provide healthier and more sustainable products which are plant-based analogues to butter. **The terminology used to define these products should be in line with the sustainability goals of the EU to move towards more plant-based diets**, clearly distinguishing between the plant-based or animal-based nature of fats.
- Current marketing standards **do not provide a thorough overview of the applications of (plant-based) fats**. In fact, both butter and plant-based fats fall under the category “spreadable fats intended for human consumption”, which limits the functions of fat products only to spreading, disregarding many other applications such as baking and cooking. **The category name should therefore be updated, providing a more truthful description of the applications of (plant-based) fats.**

The above-mentioned hurdles need to be addressed in the revision of the EU Marketing standards. At the same time, IMACE would also like to stress the importance of **considering animal- and plant-based fats as competing products** and therefore **keeping them in the same product category**, as it is currently the case. The principle of comparability based on product function, appearance, and usage has been the cornerstone of EU legislation on marketing standards for fats², and it is essential to guide consumers to make conscious consumption choices, as they usually compare ‘interchangeable’ products within the same functional category.

The above-mentioned points will ensure that consumers are kept transparently informed about healthy and sustainable fat alternatives. IMACE looks forward to working together with

² [Council Regulation \(EC\) No 2991/94 of 5 December 1994 laying down standards for spreadable fats](#)

other stakeholders and EU policymakers to update marketing standards which truly contribute to the Farm to Fork Strategy's sustainability goals. IMACE is looking forward to exchange in more detail on the specific review needs for the marketing standard on "spreadable fats for human consumption".