

IMACE position on the EU Farm to Fork Strategy

Brussels, 12 June 2020

The EU Farm to Fork Strategy will be the cornerstone of the EU food policy towards building resilient, healthy and sustainable food systems in Europe. It approaches food policy from a value chain perspective, with the objective to tackle the way we produce and consume food as much as how we dispose of land and waste.

IMACE adheres to the European Commission's ambition with the Farm to Fork Strategy, and particularly welcomes the explicit reference to the need for the EU to promote and support plant-based diets. The recognition of the role of plant-based foods in climate change mitigation and health is an important first step towards the sustainable transition. This position paper puts forward recommendations to further effectively implement sustainable food systems, from production to diets.

1. Sustainable primary production

Policymakers and the EU food industry have made significant progress in improving the sustainability of value chains through responsible sourcing. While it is essential to pursue those efforts, IMACE supports high EU ambitions for sustainable production.

- **Sustainable sourcing:** The EU has taken important steps towards fighting deforestation. IMACE welcomes the EU's intentions to toughen its efforts to halt forest degradation at home and abroad. We strongly encourage the European Commission to pursue high ambitions to avoid and reduce negative environmental impacts related to food supply chains. Our sector is committed to and will continue its efforts to foster sustainable forest management, as part of the European Sustainable Palm Oil Alliance, as well as for other commodities.
- **Sustainable production – Healthy by design:** Beyond sourcing, the EU has a role to play in encouraging more environmentally-friendly farming practices. This entails to foster systemic change to reduce pesticide use, enhance resource efficiency (water, energy) and limit agriculture-related emissions and pollution (e.g. especially with regard to animal farming and animal-based food production).
- **Stronger support to plant-based food systems:** Stepping up the EU's efforts for sustainable food production requires to identify the role and the challenges of different segments of the food chain. Plant-based foods hold vast potential to reduce the environmental footprint of European diets, while providing greater choice to

consumers willing to reduce their consumption of animal-based foods – whether for environmental, ethical or health reasons. IMACE welcomes the EU’s open support to plant-based diets and further calls on the European Commission to, first, not only promote plant-based alternatives to meat but also to dairy; second, to put in place the necessary measures and tools to enable plant-based food systems to grow. We need stronger incentives for sustainable (crop) farming and a level playing field with the animal farming, e.g. by rebalancing subsidies going to the two agricultural sectors.

- **Food first:** Crops are valuable raw materials. As such and because they respond to basic human needs, they should be destined to high-value applications, first, i.e. in the food chain. Lower value applications – such as feed, biofuels or biochemicals – should be considered further down the line.

2. Sustainable food processing

A comprehensive food policy should address critical aspects of food processing, i.e. nutrition, food safety and environmental impacts.

- **Nutrition and reformulation:** The plant-based fats sector has engaged in reformulation and adapted its recipes. As a result, it successfully improved the nutritional value of fat products (e.g. margarine and spreads), reducing their content in trans-fatty acids below the legal limit of 2g/100g of fats, as well as the content in saturated fatty acids. In addition, plant-based fats and spreads are an important source of healthy unsaturated and essential fatty acids. Despite those efforts, margarine and spreads are increasingly perceived as a threat to health, due to little awareness of their positive components. IMACE would thus welcome the European Commission’s support in educating the public about the benefits and need of food processing for certain categories of products, to achieve a sustainable food system.
- **Packaging & food safety:** The plant-based food sector embraces the EU’s ambition for a circular economy, and its aim to limit – if not forbid – single-use plastics to reduce plastic pollution. In addition to prevention, IMACE sees packaging recycling as an important action point. Support measures are necessary to accompany food operators in ensuring proper collection, separation and recycling of (plastic) packaging. Nonetheless, IMACE calls on EU and national food authorities to carefully consider food safety and consumers’ health when looking at packaging materials in contact with food. It is crucial to carry out thorough science-based assessments of the impact of novel materials (e.g. recycled plastics) on foods (migration and contamination risks).
- **Environmental footprint:** Product environmental footprints can increase our knowledge of supply chains and their impact on the environment (biodiversity, air, water, wildlife). A common methodology and framework at European level is needed,

but should accommodate the diversity of the food industry, as well as the diversity within sectors. Classifications and sustainability labels applicable to the entire food industry should not be based on the characteristics of a specific value chain. Instead, they should provide enough flexibility to adapt to the particularities of different sectors, while providing accessible information to consumers to inform their decisions.

3. Sustainable food consumption

Better consumer education and information about foods, healthy diets and lifestyles should be a priority of the European Commission as part of preventive measures for diet-related diseases.

- **Consumer information and labelling:**
 - **Front-of-pack (FOP) labelling:** The EU is essential to ensure consumer access to healthy and affordable food across Europe. Yet, consumer education remains a pitfall. Information about foods, their nutritional value and their impact on health is increasingly prone to subjective and simplistic communication. In this regard, the plant-based fats sector welcomes the intentions of the Commission to harmonise FOP labelling and nutrient profiles at Union level. It is necessary to put an end to the fragmentation of food labelling as diverse national nutrition labelling systems co-exist, each based on different methodologies. However, it is crucial that harmonisation is done in the right way, relying on science-based information that takes into account both the negative and the positive components of foods, and their role in a healthy diet.
 - **Non-discriminatory labelling:** It is key that the EU population moves to a more plant-based diet for environmental and health reasons. To achieve this, consumers need to decrease their consumption of animal-derived foods, and thus need suitable options to replace those, namely with plant-based foods. IMACE therefore calls on the EU to apply non-discriminatory labelling principles for plant-based foods.
 - **Tax incentives:** Affordability and accessibility of healthy products is key to move towards sustainable and healthy diets. Plant-based and animal-based fats are unequally taxed across the EU: the higher VAT rates applied to margarine often makes it a less affordable choice than butter for consumers. IMACE therefore calls for a level playing field for plant- and animal-based fats, allowing equal access to the market and providing equal choices to consumers.

The plant-based fats sector is supportive of the upcoming EU Code of Conduct for responsible business and marketing practices. IMACE and its members are relentlessly working towards making the spreadable fats value chain more sustainable, namely through becoming deforestation-free. Our sector is committed to pursuing this goal.