

FEDIOL COMMENTS ON THE COMMISSION CONSULTATION ON THE FARM TO FORK STRATEGY ROADMAP

FEDIOL - the EU association representing the vegetable oil and protein meal industry - welcomes the opportunity to provide comments on the consultation on the European Commission Roadmap on the Farm to Fork Strategy.

FEDIOL companies are an integral part of the food and feed value chain and have been striving to ensure environmental, social and economic sustainability across their supply chain. By adding value to agricultural commodities through their transformation into food ingredients, our sector is contributing ultimately to affordable prices for consumers and ensuring an efficient management of food and feed safety risks.

Industries in our sector also operate as bio-refineries and convert agricultural biomass into bio-materials throughout a continuous production process. While the supply of safe and affordable food constitutes the core priority for our sector, relying on different outlets is a fundamental aspect for the competitiveness of the EU agricultural sector. Hence, any policy proposal under the Farm to Fork should be carefully assessed against parallel legislation in other sectors (such as circular economy, waste regulation, protein strategy and renewable energy) so as to ensure policy coherence and harmonisation among the different initiatives.

For a real change to happen, efforts must be undertaken at each step of the food/feed chain. Our sector is conscious of its responsibility in driving change throughout the supply chain by reducing its environmental impact and for over a decade our industries worked towards effective progress in this matter.

FEDIOL concurs that, as the issue of food sustainability is an integral part of the Green Deal, it needs to be addressed in a holistic way. As such, alignment and coherence across the Farm to Fork Strategy and within the Green Deal integrating all responsible DGs is fundamental.

Recognising the importance of accelerating the transition towards an EU sustainable food system, the forthcoming initiative should firstly integrate the need for maintaining the same level of European food safety as the top priority. At the same time, a complete overhaul of the current food system is likely to affect the role of Europe in ensuring food security as well as the viability and competitiveness of agriculture raw material cultivation and food processing in the EU. Envisaged changes need assessment and will lead to political trade-offs which should be clearly communicated. In this context, education and further communication on how the EU food and feed chain model works are necessary tools to consider, together with the promotion of science-based policy strategies.

For FEDIOL, it is important that the strategy include an international dimension based on cooperation and partnership with countries with which we have trade relations. The EU has

already established a set of instruments in trade and international cooperation. For the implementation of additional initiatives on food sustainability not to be detrimental to the EU competitiveness or to our trading partners' ability to access the EU market, appropriate mitigation approaches will have to be considered.

Considering the broad spectrum of the Farm to Fork strategy, FEDIOL would like to focus on the following specific non-exhaustive list of topics:

1) Pesticides: strengthening consumer, health and environmental protection whilst ensuring access for EU operators to sourcing from the global market

With a view to strengthening consumer, health and environmental protection, FEDIOL can understand the need for a new policy on pesticides to *significantly reduce the use and risk of chemical pesticides*.

Comprehending this objective, FEDIOL calls for an approach which embraces the system change this implies and puts more emphasis on integrated approaches, technologies, instruments and time necessary to transition to this new normal. The implementation of this new policy should be accompanied by measures helping to mitigate the impacts on supply chain players, notably in rural communities, and avoid supply disruptions. New responses should be given to pressure from pests and diseases through the development of alternatives to existing agronomic practices and to chemical pesticides. Indeed, whilst we note the ambition to create new business models, this cannot take place in one day and requires tailor-made adaptation steps. Such potentially disruptive transition is not only a serious challenge for farmers, but also to processing sectors like ours, directly relying on raw materials from the EU but also from outside the EU and relying on existing best practices for the processing of these raw materials.

We would particularly underline that a government to government approach is necessary to accompany such fundamental change in policy approach in order to mitigate impacts on raw materials sourced from outside the EU, where pesticides' MRLs would remain at a higher level. FEDIOL believes that the EU has a key role to play in raising awareness with third countries. Our sector is of course willing to support such actions via outreach to key third countries' authorities and business representatives to inform them about new EU law requirements but government to government discussion remains key. The new policy approach will have an important impact on current imports of raw materials from third countries, and carry consequences on many supply chains, which will have to be carefully assessed and acknowledged.

It is important to understand that, whilst pesticides use and risk can be reduced, they **cannot be lowered to zero**. FEDIOL members are already facing an increased threat of crop contamination, both at production and post-harvest level, in turn leading to losses in yield, revenue and as a consequence in overall environmental performance. We can anticipate that these effects would increase as a consequence of climate change. Hence, due account of impacts of climate change and other crop stressors on food and feed should be considered (e.g. [CLEFSA project](#) led by EFSA). When setting concrete reduction goals on the use and risk of chemical pesticides, the **availability of viable alternatives and implementation of agricultural techniques are key**. This entails the increased use of Integrated Pest management (IPM), the stimulation of the availability of efficient alternatives, low-risk or biological solutions by adapted regulatory framework. Instead of a complete change of the existing legislations on pesticides, FEDIOL would rather plead for a better enforcement of the existing legislations and for the adaptation of some parts of the regulatory framework where relevant. For example, the existing Directive 2009/128 on the sustainable use of pesticides already contains harmonized risk indicators which could be used to set targets for the reduction of use and risk of chemical pesticides. Beyond the clear cut distinction between organic and conventional farming, other concepts such as "integrated agriculture", based on IPM should be further investigated.

Organic farming is another element to consider in the debate. Today, the supply of organic raw materials for use by our sector is often scarce. The current requirements of organic processing often do not match available crushing and/or refining techniques of vegetable oils and fats. At the intersection between farmers, food and feed industry downstream and consumers, achieving growth in the share of organic vegetable oils requires technological advances in agriculture and processing techniques so to enable a share of organic production to reach industrial scale in our sector. FEDIOL stands ready to engage on what can be adapted or not in our industry for the production of organic vegetable oils, whilst maintaining food safety and quality.

As regards fertilizers, and whilst we understand the need to lower the environmental impact of chemical fertilisers and reduce their use, any concrete EU targets need to go hand in hand with the setting up of a full strategy on how to maintain/optimize the use of nutrients in agriculture whilst ensuring efficiency of land use, productivity and circularity.

2) New Genomic Techniques: setting up a new policy framework open to new technologies.

New genomic techniques hold exceptional promises for the development of smart agriculture that will be needed to address various challenges linked to reduced availability of active substances, to lesser use of fertilizer and to increased climate change impacts and to improve sustainability along the chain.

FEDIOL welcomes the ongoing assessment of the issue and the development of an appropriate questionnaire aimed at gathering input from all stakeholders.

Plant varieties obtained with these techniques are already available or expected to be available on the market in the very near future. For FEDIOL, a regulatory framework specifically adapted to these techniques is urgently needed. Such framework should treat NGTs in a manner which is commensurate to their specificities. This would avoid leaving an important gap in the way NGTs are dealt with in the EU and in other countries as this can potentially lead to high uncertainty and serious problems for commodity trade.

3) Food Information to consumers: empowering consumers through effective food labelling

As mentioned in the Roadmap, a cornerstone of the Farm to Fork strategy lies in the provision of better food information.

In this context, FEDIOL would like to highlight the following points:

- a) **Vegetable oils and fats play an important role in a healthy and balanced diet.** They provide essential nutrients for our body, such as in particular omega 3 and polyunsaturated fats, for which specific EU nutrition and health claims have been approved at EU level. They are also a key vector for the absorption of fat-soluble vitamins. Whilst the WHO recommends to moderate the consumption of total fat intake to less than 30% of total energy intake in the context of a healthy diet, it particularly recommends to favour vegetable oils and fats rich in polyunsaturated fats. EU labelling and nutrition policies should take into account such nutritional benefits.

Our sector will continue to support reformulation efforts in the final food products into, on the one hand, reducing saturated fats to the level possible depending on each food product, and on the other hand on increasing the content in polyunsaturated fats, as recommended by WHO and national dietary guidelines.

As a sector and in line with such dietary guidelines, in order to further address nutritional quality of food products, FEDIOL stands ready to **further support the omega 3 consumption by making available a broad spectrum of bottled vegetable oils** high in or source of omega 3 fatty acids across all EU Member States.

- b) FEDIOL awaits the upcoming Commission report on **nutrient profiles**, which will shed light on the next EU steps and set the path towards a harmonised EU FOP nutritional scheme.

In this context, FEDIOL recognises the need for a simplified system to drive and stimulate consumers' choices towards nutritionally better food products. For such a system to be efficient and drive adequately consumers' choice, an absolute FEDIOL pre-requirement is alignment with existing international, EU and national dietary guidelines as well as EU approved nutrition and health claims where nutritional benefits of some vegetable oils and fats components are clearly recognised.

This is not the case for bottled vegetable oils under existing national nutrition schemes like the Nutriscore which are more and more used by EU countries, and hence adjustments are required. To enable a comparison across bottled vegetable oils and fats and alignment with EU law and dietary guidelines, FEDIOL proposes to take due account of "high omega 3 fatty acids" and "high unsaturated fatty acids" as defined in Regulation (EC) No 1924/2006. This could apply to any type of simplified EU harmonised FOP nutrition scheme. A [FEDIOL infographic](#) further illustrates this.

- c) With regards to **origin labelling**, FEDIOL understands consumers' request to know where the food comes from and the quality associated with it. However, this should be assessed on a case-by-case basis and depending on the relevant food products. As substantiated in past Commission work, quality is dependent on the know-how of a refiner and not on where the refining occurred. Therefore, providing the origin of vegetable oils and fats on a mandatory basis risks misleading consumers on a non-substantiated link between safety or quality and a specific origin (that such products would not possess intrinsically). FEDIOL considers that, for vegetable oils and fats, the new Regulation on voluntary origin labelling provides a sufficient framework.
- d) **Other ways** than the traditional labelling need to be explored to provide information to consumers. **Digital means** can play a role to give more information than what is physically possible on a food package. FEDIOL is investigating the possibility of implementing a QR codes system for our vegetable oils and fats, which would provide overall FEDIOL information on nutrition and link to further FEDIOL members' specifics.
- e) Increased focus on food information to consumers should entail a revision of existing EU legislation and the assessment of **existing labelling requirements to check whether they are still fit-for-purpose**. The existing requirement for fully and partially hydrogenated labelling is an example of redundant and even confusing labelling, now that the EU legislation setting a maximum level on *trans* fatty acids (TFA) is in force.
- f) Last but not least, **education** remains a very important tool, which should be strengthened. Industry can play a role, but its actions and effectiveness would be limited. Hence, accompanying educational tools on what a "sustainable and healthy diet" entails and how to achieve it are essential, so to guide consumers' choice. A number of national authorities have already done work in this area, such as the Schijf van Vijf in The Netherlands which provides concrete examples of meals in line with nutritional guidelines. EFSA could also play a role in this context in coordinating actions from Member States.

4) Labelling of environmental performance

FEDIOL participated in the elaboration of Product Environmental Footprint (PEF) methodologies and is supporting the harmonisation that PEF has achieved. Methods as well as data are now available for LCA assessment, creating a level playing field in case companies would communicate on LCA results or on certain aspects of the environmental performance of products. While FEDIOL can support the harmonization being offered by PEF methodology a potential policy framework should ensure that it remains voluntary. The design and implementation of a policy framework that allows the use of PEF as a diagnostic tool for identifying hotspots and promoting continuous improvements should be favoured. It would also be important to involve all stakeholders in the development of such policy framework.

While Product Environmental Footprint Category Rules (PEFCR) are now available for six food and drink sectors, for the many remaining sectors like ours, category rules have yet to be developed with important cost implications to care for independent verification of the PEFCR results. The variety and complexity of food and drink products like vegetable oils and fats should be taken into account.

It should also be highlighted that there is still no assessment available of the impact, which product-related environmental claims would have.

Before using any PEF claims, it may indeed be relevant to investigate whether and to what extent:

- consumer would change their consumption pattern in favour of lower impact food,
- whether certain impacts should be taken care of in a pre-competitive manner,
- and to what extent it would effectively contribute to lowering the impact or rather to reallocate product flows and hence export impact to other regions.
- the use of PEF as reference methodology can combat false green claims.

FEDIOL recommends 1) the use of product environment footprint as a basis for continuous improvement and 2) to further research into the use of such method in the framework of communication of the environmental impact of products.

5) Food waste: avoiding unnecessary restrictions on an already efficient sectoral processing

Our sector has a long history of process optimisations, which has led to high standards of resource efficiency and raw materials' valorisation, thanks to which we can produce a wide range of products and by-products for use in food, feed and industrial applications, leaving virtually no waste.

As such, we already provide an efficient example of food waste prevention and directly contribute to the circular economy ambitions of the EU.

However, the recent European Commission Delegated Decision (EU) 2019/1597 as regards a common methodology and minimum quality requirements for the uniform measurement of levels of food waste inaccurately categorises the processes from the vegetable oil and protein meal industry as producing food waste, to be measured across the EU. This assumption does not match reality and needs adjustment.

FEDIOL asks the European Commission to reconsider the inclusion of edible oils processing in the Delegated Act, as no food waste results from the processing of edible oils. Any mandatory measurement of food waste would create administrative burden without delivering any environmental benefit.

6) Environmental tools under the Common Agricultural Policy (CAP)

The CAP is recognised as one of the key tools to support and enforce the Farm to Fork strategy. Under the current framework, Member States will be asked to boost the environmental and climate performance of their farming systems through National CAP

Plans. As these plans have not been drawn up by Member States and approved by the EU Commission, we believe that the Farm to Fork strategy should bring clarity on how exactly the specific initiatives will be incorporated in the new CAP framework. The proposed frameworks for CAP and Farm to fork strategy should thereby complement and not contradict each other and make use of existing initiatives and tools.

The current CAP has a strong focus on environment and climate objectives, since cross-compliance and greening measures mean farmers only receive CAP grants if they meet specific environmental requirements. This should be accompanied by sufficient funding mechanisms in the EU budget. To allow the farming sector to respond to higher expectations with regard to environmental protection and performance, adapted and more effective tools and technologies will need to broadly be made available. Beyond the production of food, it will also be important to identify new ways of remunerating environmental services rendered by the farming sector, such as carbon storage, enhanced biodiversity, etc.

7) Biodiversity and climate resilience

FEDIOL companies are conscious of their responsibility for the objective of reducing biodiversity loss and eliminating deforestation from their supply chain. They have developed and implemented over the years voluntary sourcing policies, pledges, monitoring, traceability, verification systems, financial instruments and other tools to achieve transformation towards practices meeting biodiversity and climate objectives.

The EU will pursue the objective of eliminating deforestation from imported materials as a contribution to reduce impact on climate change and address biodiversity loss. This objective only makes sense if accompanied by actions to stop deforestation or conversion on the ground, which will require the EU to engage in partnership and cooperation with countries producing forest-risk commodities, via trade agreements, development cooperation and other instruments.

Intervention at EU level should support common definitions, raise awareness about the important role of every actor across the chain and send a signal to global partners about the EU's commitment to eliminate deforestation from its supplies. EU action should also provide incentives for a broader engagement of all players in this effort and for a wider use of available tools (traceability, pledges, monitoring, sourcing policies, reporting on progress, certification, grievance procedures, payment for environmental services/green bonds...) by private and public players to ensure a level playing field.
