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FEDIOL position on sustainable food systems

FEDIOL - the EU association representing the vegetable oil and protein meal industry - welcomes the opportunity to provide comments on the public consultation on setting up an EU framework on sustainable food systems. Whilst we are responding to the questionnaire of the public consultation, we would also like to add several points and clarifications. This document is hence to be understood as complementary to the submission of our responses to the questionnaire.

FEDIOL supports the overall objective of setting an EU framework on sustainability, particularly as a clear signal is required to provide an agreed, comprehensive vision of the food system the EU considers sustainable and wants to transition to. The change towards more sustainability will be subject to trade-offs and in the run-up to such framework, there is a need for debate, understanding and communication of the nature of these trade-offs and their implications, so that they can be studied, and the policy revised if appropriate.

Education and further communication on how the EU food and feed chain model works and how it should evolve are necessary tools to consider.

Strategies developed to support achieving a sustainable food system must be science-based, inclusive, harmonized, and flexible and continue taking into account technological and scientific advancements. As such, the new legislative framework and its implementing legislation(s) would need to be periodically reviewed to assess their impact and to take account of the potential of the technological, scientific, and regional advancements.

1. Definitions and principles

The first crucial point in setting such a new EU framework is to ensure that definitions and principles are very clear and agreed by all parties. FEDIOL hence regrets that this is not part of the public consultation. FEDIOL would however like to share some thoughts on this. Today, there is no harmonised approach neither on how to define sustainability nor on how to promote sustainable choice, which is leading to a patchwork of policies at MS and at EU level. It is important that the future sustainable food systems legislation strives to harmonize approaches. To empower consumers making sustainable choices, it is essential to ensure a common vision for food systems sustainability at EU level but also to continue driving at global level several key requirements for food production and a converging vision for sustainable food systems.

In the public consultation, a definition of “food system” is provided, which refers to recent JRC work¹, which contains a similar approach to the definition provided by WHO², referring to “*impacts on the economy, environment, and society (including health)*”, whilst WHO refers to “*outputs of these activities, such as socio-economic and environmental outcomes*”. In addition, FAO defines sustainability in a more comprehensive way, as it also encompasses food security³. FEDIOL considers that the wording used by WHO as regards the 3 pillars of sustainability provides for a more balanced and realistic approach and should be favoured. In addition, the aspect of food security as well as the social and cultural aspects are equally important and should also be included into the EU definition of sustainability. FEDIOL considers that the EU definition should be revised to address those important elements.

The public consultation further offers a definition of sustainable food systems⁴. Whilst it does refer implicitly to the 3 pillars of sustainability – social, environmental, and economic – which are common knowledge⁵, FEDIOL however considers that this should be acknowledged clearly **as an integral part of the upcoming new EU framework** and the economic pillar considered in the sustainability assessment.

Furthermore, FEDIOL considers that the **links between various principles and EU policy objectives** – such as food safety, nutrition, climate, environment to name a few – also need to be set clearly. It would not be acceptable for example that setting a sustainable framework would come at the expenses of a lowering of EU food safety standards or nutrition objectives. Equally, FEDIOL considers that a science-based policy approach should be at the core of any future steps to initiate a transition for more sustainability. It is hence important that such interlinks between the various other EU policies are set clearly in the upcoming EU framework. For example, when it comes to labelling, FEDIOL considers that the upcoming new EU framework on sustainable food systems should not undermine the existing EU framework on food labelling (Regulation (EC) No 1169/2011) which is also under revision (see response to question 15).

Also, policy coherence and proportionality should be enshrined in all food/feed policy/regulatory topics. The link to Regulation (EC) No 178/2002 should be clarified.

2. Overall sustainability considerations

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 efficient industrial transformation into food and feed ingredients, our sector contributes to affordable prices for consumers and guarantees revenues for farmers, while ensuring

¹ JRC: Bock, A., Bontoux, L. and Rudkin, J., Concepts for a sustainable EU food system, EUR 30894 EN, Publications Office of the European Union, Luxembourg, 2022, ISBN 978-92- 76-43727-7 (online), doi:10.2760/381319 (online), JRC126575.

² <https://www.who.int/initiatives/food-systems-for-health> According to WHO, “a food system includes all the elements (environment, people, inputs, processes, infrastructures, institutions, etc.) and activities that relate to the production, processing, distribution, preparation and consumption of food, and the outputs of these activities, such as socio-economic and environmental outcomes.”

³ <https://www.fao.org/3/ca2079en/CA2079EN.pdf>

⁴ “A sustainable food system for the EU is one that: provides and promotes safe, nutritious, and healthy food of low environmental impact for all current and future EU population in a manner that itself also protects and restores the natural environment and its ecosystem services, is robust and resilient, economically dynamic, just, and fair, and socially acceptable and inclusive. It does so without compromising the availability of nutritious and healthy food for people living outside the EU, nor impairing their natural environment.” <https://www.sapea.info/wp-content/uploads/sustainable-food-system-report.pdf>

⁵ Purvis, B., Mao, Y. & Robinson, D. Three pillars of sustainability: in search of conceptual origins. Sustain Sci 14, 681–695 (2019). <https://doi.org/10.1007/s11625-018-0627-5>.

a professional management of food and feed safety risks. It also uses agricultural raw materials to the full, providing value added to all components of the agricultural commodity through applications in food, feed and non-food uses, triggering very limited waste at industrial level.

For a real change to happen, **efforts must be undertaken at each step of the chain**. With its unique central place in the food and feed chain, our sector is already working on several sustainability initiatives and ready to engage on the transition towards more sustainable food systems.

As an EU association, FEDIOL signed the **EU Code of Conduct for responsible business and marketing practices**. It has further developed an action plan and will build on the exchange and intelligence sharing among signatories to pursue areas for closer cooperation. Building on corporate commitments of its member companies, FEDIOL is particularly cooperating with other EU associations and with organisations in third countries on enhancing sustainability and reducing the impacts of the production of commodities that it sources for further processing.

With the numerous actors involved, FEDIOL considers that setting platforms to foster dialogue is crucial to accompany a change towards sustainable food systems. For example, this has already worked in the past on reformulation through the setting of the High Level Group on Nutrition and Physical Activity and the Platform for Action on Diet, Physical Activity and Health. This is a way to facilitate cooperation across the supply chains on this matter, to enable a level playing field and to ensure ultimately access of sustainable products to consumers. Dialogue should enable to reach consensus on core principles i.e., what is sustainability, which criteria to apply etc. These platforms should serve as a space for exchange of expertise and understanding of sustainability challenges from a practical point of view to make sure that the most impactful, workable, and efficient approaches are agreed on. This way of working should be further pursued through the new EU framework on sustainable food systems.

Overall, FEDIOL would also like to stress the need to take due account of innovation to increase sustainability. Regulatory barriers to bring innovations to market should be addressed. In this context, new genomic techniques (NGT) are essential to the development of smart agriculture that will be needed to address various challenges linked to reduced use of pesticides, to lesser use of fertilizer and to increased climate change impacts and to improve sustainability along the chain. FEDIOL hence considers crucial that they are considered as part of the solution and that an appropriate legal framework is set.

3. Sustainable labelling considerations

Moving towards more sustainable production remains difficult for most actors in the middle of the chain, as it often involves costs in the short term, but also issues of achievability. The possibility to opt for sustainable choice will be made after an analysis on return on investment.

As regards consumers, the multiplication of various labels, private initiatives like smart phone applications and different definition of what entails sustainability can also make choices difficult.

FEDIOL does not believe that a name and shame approach is the right way to increase sustainability in the chain and ultimately the uptake by consumers when deciding on which food products to buy. Instead, FEDIOL believes that the use of voluntary information or labelling using recognised methods for the assessment of environmental performance, like LCAs and PEF would have value in consolidating efforts throughout

the EU and help consumers. If an EU sustainable label was to be set, it should only be applicable on a voluntary basis and it should help identify sustainable food products. The criteria and assessment methodologies applied should be harmonized, scientifically robust and developed in consultation with stakeholders and take the specificities of sectors and products into account.

FEDIOL commissioned a PEFCR for vegetable oils and protein meal products to VITO, which has been released in early June 2022. The life cycle stages covered include the industrial processing of commodities, such as oilseeds and crude vegetable oils, but also the up-stream stages of cultivation and transport and the downstream stages of transport of the processed products to the customers. The full study and PEFCR are available [here](#) and [here](#). Thanks to that study, FEDIOL companies now have the tools to assess the environmental hot spots of their own products. They can also use a footprint method that is harmonised across the industry to respond to customer requests on the environmental impacts of their products.

4. Nutrition considerations

FEDIOL understands that one of the objectives pursued by the future EU framework on sustainable food systems would be to investigate the possibility to set food composition targets for sugars, salt, and saturated fats for all food categories.

As far as vegetable oils and fats are concerned, FEDIOL would like to highlight that **setting targets can only make sense, if such targets are science-based, achievable through reformulation and be developed per food category/considering food category specificities. This is not the case for vegetable oils and fats** – and particularly single botanical origin bottled oils – whose content in SAFA cannot be reformulated as such and depends on the inherent natural properties of their botanical origin. **FEDIOL hence does not consider that this is the right approach for bottled vegetable oils and fats.**

As regards the concept of ultra-processing, there is no common definition of what it should entail. Various approaches have been followed by different institutes. As far as vegetable oils and fats are concerned, they are either not considered as processed food as such⁶ or are considered as ultra-processed food⁷. This is leading to clear discrepancies and confusion, particularly for consumers. **FEDIOL is against the inclusion of the concept of ultra-processing into the new EU framework on sustainable food systems, as it is so far not based on science-based criteria and is stigmatizing some food products.**

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 polyunsaturated fats like omega 3, 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 moderating the consumption of total fat intake to less than 30% of total energy intake in the context of a healthy diet, it particularly recommends favoring vegetable oils and fats rich in polyunsaturated fats. This is also the approach followed by national and international dietary guidelines. It has also been recently further highlighted by EFSA⁸. Setting criteria for ultra-processed foods, which could potentially

⁶ NOVA classification.

⁷ SIGA classification.

⁸ EFSA NDA Panel (EFSA Panel on Nutrition, Novel Foods and Food Allergens), Turck, D, Bohn, T, Castenmiller, J, de Henauw, S, Hirsch-Ernst, KI, Knutsen, HK, Maciuk, A, Mangelsdorf, I, McArdle, HJ, Naska, A, Peláez, C, Pentieva, K, Thies, F, Tsalouri, S, Vinceti, M, Bresson, J-L and Siani, A, 2022. Scientific Opinion on the scientific advice related to nutrient profiling for the development

include vegetable oils and fats, would not be in line with national and international dietary recommendations and runs the risk to even lower the consumption of such nutrients, which are crucial for our health.

5. Sustainable food and food systems aspects in relation to imports

As the EU is examining ways to apply equivalent environmental and health standards to imports of agricultural and food products into the EU, FEDIOL stresses the importance of consulting and coordinating with producing countries as well as providing the necessary assistance, especially to developing and least developed countries, when applying EU measures.

Unilateral action runs the risk of being challenged under the WTO dispute settlement system. Furthermore, insufficient assessment of the technical and economic feasibility of import standards in producing countries, combined with a lack of support for implementation, generally leads to an exclusion of the most vulnerable actors from EU supply chains without resulting in a net positive change in practices at the level of regions/countries. Therefore, to promote the uptake of sustainable practices on the ground according to the EU's standards, financial incentives and support are required.

Finally, the EU should ensure that clear and feasible control mechanisms are designed to avoid legal uncertainty for companies placing products on the EU market.

FEDIOL remains available to provide further input into the next steps of the process, including on the subsequent legal acts to implement the future EU framework on sustainable food systems.

of harmonised mandatory front-of-pack nutrition labelling and the setting of nutrient profiles for restricting nutrition and health claims on foods. EFSA Journal 2022; 20(4):7259, 48 pp. <https://doi.org/10.2903/j.efsa.2022.7259>