

EU Specialty Food Ingredients on the way forward sustainable food systems framework



EU Specialty Food Ingredients is fully committed to the EU Green Deal and Farm to Fork's objectives of ensuring climate change adaptation and mitigation solutions while producing sustainable, safe, affordable, high quality and nutritious food ingredients for the food supply chain in compliance with the circular use of resources. Furthermore, EU Specialty Food Ingredients recalls that the food sector is a highly regulated domain, with product specificities rigorously assessed by a dedicated agency (EFSA) and dedicated Standing Committees. Therefore, the new legislation has to consider the sector's specificities by applying a risk-based approach assessment.

As a signatory of the EU Code of Conduct on Responsible Food Business and Marketing Practices, our federation and its members are fully engaged in the dynamic transition towards more sustainable food systems, and we support a robust and fair proposal for an EU legislative framework for sustainable food systems to be presented by September 2023. The new legal framework should set a clear path for the transition to a sustainable and resilient EU food supply chain, as it is a critical step to achieving the Paris Agreement, the UN SDGs, the European Green Deal and Farm to Fork goals.

EU Specialty Food Ingredients stresses the following:

1. RESEARCH, INNOVATION AND NEW TECHNOLOGIES

Research and Innovation are widely recognised prerequisites to the green transition. As such, these are critical to fully unleash the potential of an innovation-led sustainability-enabling sector such as the specialty food ingredients industry. With 3-8% of its turnover dedicated to R&D, the European Specialty Food Ingredients industry considers a conducive regulatory framework essential to innovation, development and timely market breakthrough. These elements are critical drivers for transitioning to sustainable food systems, from primary production to consumption.

Innovative ingredients and applications should be recognised as critical in addressing societal demands for new protein sources, reformulated and healthier foods, and more sustainable sourcing and production, to prevent food waste and meet climate ambitions.

The innovation principle should be fully implemented to ensure that all EU policies and legislation are “developed, implemented and assessed in view of encouraging innovations that help to achieve the EU’s environmental, social and economic objectives, and to anticipate and harness future technological advances.”¹

Agility and flexibility are needed in the legislative framework to facilitate the development and introduction of innovative sustainability-enabling specialty food ingredients and allow these to realise their full potential to contribute to sustainable food systems.

1. See the European Commission on the Innovation Principle in the Innovation Principle Fact Sheet, available online at: https://research-and-innovation.ec.europa.eu/system/files/2022-07/ec_rtd_factsheet-innovation-principle.pdf

2. ENABLING LEGISLATIVE AND POLICY ENVIRONMENT

Securing an EU-common, science-based, feasible and predictable framework is crucial to support innovative solutions for producing and employing food ingredients. Thus, it is key to clarify the relations between the Framework for Sustainable Food Systems and the General Food Law as well as the relation with other pertinent sectors (i.e. emissions, chemical, food waste targets, packaging, and plastic waste), avoiding regulatory uncertainties or potentially harmful trade-off among EU laws compliance (i.e. food security and/or food safety vs sustainability).

Ensuring the transition to a sustainable food systems framework by a coherent approach in all Union present policies and actions is essential for the resilience and competitiveness of the EU food sector. The public-private research and investment partnerships (Horizon Europe, Cluster 6, Taxonomy delegated acts) should continue to be supported, specifically in scaling-up projects and new sector-specific actions, i.e., an EU Food Investment and Resilience Plan. Political and strategic coherence includes the EU green diplomacy for levelling the playing field in the EU market and strategic coordination under the EU institutions' mandates.



Working together with food supply chain stakeholders and the co-legislators is paramount to build workable solutions to enable the food industry to contribute effectively to the Framework for Sustainable Food Systems, foreseeing technical dialogues and adequate time to deliver quality contributions. Also, the food industry should have a realistic time for the transition to comply with the Framework for Sustainable Food Systems provisions.²

2. For example, foreseeing flexible mechanisms for the food industry in case of emergencies or unpredictable circumstances in applying the new framework provisions.

3. ACCURATE, TRANSPARENT AND UNBIASED LABELS

The EU Specialty Food Ingredients industry strives to offer innovative and sustainable solutions to meet the demand of customers and consumers. **Accurate, transparent and unbiased communication should prevail** to achieve the common objectives of a high level of food safety, consumers' interests in food information, and an EU future-proof, sustainable and resilient food system

Specialty food ingredients play an **active role in developing sustainable food systems** by providing healthier and more sustainable dietary solutions (e.g., plant-based proteins, sugar and salt substitutes, plant-based fibers, preservatives and fermentation solutions that can help prolong shelf-life and prevent food waste). The incoming legislation on Front of Pack Nutrition Labelling and sustainability labelling should be instruments to guide consumers to make scientifically sound choices in terms of nutrition, quality and sustainability.

Environmental food labels are welcome to help consumers make choices based on transparent and reliable information to consumers on products' sustainability, circularity, and life cycle assessment. Environmental impacts should be holistically assessed beyond the product's carbon footprint. It is needed to develop specific guidelines for the specialty food ingredients, or, the industry should be permitted to substantiate its claims based on the PEF methodology. The safe use of approved food ingredients should not be put at risk of unnecessary restrictive regulatory interpretation or not scientifically supported hazards, as specialty food ingredients are essential to ensure high nutritional values, preserve product quality and palatability and extend shelf life to prevent food waste. Only relevant sustainability-related information should be part of the labels because the level of processing is not a marker of health or sustainability.



To conclude, **EU Specialty Food Ingredients** welcomes the incoming framework legislation on Sustainable Food Systems and supports the proclamation of 2024 as the “European Year of Sustainable and Resilient Food Systems”, and **it’s willing to support with its know-how and innovation potential the EU towards sustainable and safe food systems**. It, therefore, stresses the need for a paradigmatic change that enables all supply chain stakeholders, including consumers, to cooperate for common long-term solutions in the legislative Framework for Sustainable Food Systems.

FOCUS ON FOOD WASTE PREVENTION

Food waste causes resource depletion and greenhouse gas emissions. The specialty food ingredients industry fully supports the EU pledge to halve food waste by 2030. It actively contributes to this change by enabling the prevention of food waste, which is the top priority according to the waste hierarchy. Ingredient manufacturers constantly improve their solutions to optimise production processes and enable other food chain stakeholders to make their products more sustainable.

The long-term viability of natural resources has stimulated food ingredient manufacturers to revisit current practices and explore circular and sustainable alternatives. More importantly, for example, food ingredients such as fermentation technology, preservatives, anti-oxidants and enzymes help extend the shelf-life of foodstuff, keeping food products’ quality longer and preventing consumer food waste.

EU Specialty Food Ingredients represents a united voice for the specialty food ingredients industry on scientific, technical and regulatory issues relating to food products in Europe. It is our aim to ensure that all stakeholders - from manufacturers and retailers to regulatory authorities and consumers - are correctly informed of the use, safety and benefits of specialty food ingredients. In total, more than 200 international and national food ingredients companies are currently involved in the Federation's activities through direct membership or an association. 3-8% of EU specialty food ingredients manufacturers' turnover is dedicated to research and development.

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