

26. October 2021

Feedback on the European Commission's Roadmap on Sustainable Food Systems

We welcome the opportunity to comment on the inception impact assessment leading to a Framework for Sustainable Food Systems and encourage the Commission to look at the many private and voluntary initiatives that are already present in the market today and use them as an example when developing new principles and definitions.

General comments

The Danish Chamber of Commerce supports the general content of the roadmap, which covers a broad range of important aspects to be considered when setting up a framework for sustainable food systems. We believe that research and innovation, as well as the development of new biotechnologies are important drivers for the transition to more sustainable and healthy food systems. It is however key that food safety is never compromised, and we therefore encourage the Commission to keep food safety and a science-based approach at the heart of the sustainable food system, building on the success and lessons learned in the implementation of the general food law.

The Danish Chamber of Commerce suggests that a framework for sustainable food systems focuses on initiatives that support new, innovative foods and greens proteins, help reduce food loss and waste, stimulate a healthier and more sustainable food consumption, and sets harmonised mandatory sustainability criteria for public procurement.

We believe that the best way to reach the objective of ensuring that all foods placed on the EU market increasingly become sustainable, and to ultimately transform the EU food system into a positive contributor to the health of people, of the economies and of the planet, is through a combination of reinforcing existing regulation and voluntary approaches, like the EU Code of Conduct.

The Commission has already started reinforcing existing regulation like the revision of marketing standards to take into account sustainability considerations and the revision of date marking rules, to further reduce food waste. Initiatives that we support, but we also see obvious areas where more can be done to reduce food waste, for example revision of rules and procedures for food recalls and withdrawals, as well as revision of the rules on animal feed.

Specific comments

New, innovative foods and greens proteins

The global demand for protein is expected to double ahead of 2050. A significant part of the growing demand for proteins should, preferably, be covered by alternative green proteins as a supplement to traditional meat protein and new grass and plant proteins. Alternative green proteins are

for example animal feed proteins that are produced by fermentation of methane gas, or proteins for human consumption that are produced from fermentation of micro algae.

The climate mitigation potential from alternative green proteins is immense. An analysis from HBS Economics¹ shows that green proteins hold the potential to reduce global carbon emissions by more than 1 billion tons CO₂ in 2030, even by a conservative estimate. Today, however, both demand and supply of green proteins are seriously hampered in the EU. On the demand side, the CAP should encourage the adaptation of carbon reduction technologies among farmers, e.g., by providing an incentive to switch to alternative protein feedstock instead of importing soybean-based feed from third countries. On the supply side, green proteins for human consumption are regulated by the novel food legislation, resulting in lengthy and bureaucratically complex approval processes. Finally, alternative green proteins are negatively impacted by the current EU agricultural policies, since the CAP subsidizes traditional meat proteins but not green proteins, meaning that producers of alternative green proteins do not compete on a level playing field.

Global competition with new food products and green proteins is fierce and growing. In 2020, US start-ups within alternative proteins raised 2,8 billion USD in capital. In other words, the EU risks losing the chance to create growth and new jobs within this growing food sector. Therefore, the Danish Chamber of Commerce encourages the European Commission to ensure innovation and growth friendly framework conditions for the development, production, and consumption of alternative green proteins.

Reduction of food loss and waste

The Danish Chamber of Commerce supports the EU commitment to meet the Sustainable Development Goal 12.3 target to halve per capita food waste at the retail and consumer level by 2030 and reduce food losses along the food production and supply chains. Both at EU- and national level as well as at individual company level we are already well under way in reducing food loss and waste, but still food business operators along the whole supply chain are challenged with obstacles because of EU-rules, for example the different procedures concerning food recalls and withdrawals between EU member states, as well as the strict rules on animal feed that make it almost impossible to donate surplus foods to farmers as feed. We believe that food waste deserves a continued strong focus, especially at those stages where numbers are highest, and we therefore encourage the Commission to perform an in-depth analysis of where existing EU-food regulation hinders reduction or even increases food loss and waste.

Stimulating a healthier and more sustainable food consumption

The Danish Chamber of Commerce supports a thorough reflection on the provision of information on the sustainable performance of the food (sustainable labelling), as part of this framework. Any future EU sustainability labelling would need to be based upon an agreed, reliable, and documentable science-based methodology. When considering provisions on sustainability labelling it is also important that there is consistency with other relevant EU regulations (e.g., organic

¹ HBS Economics, "CO₂-reduction potential from biosolutions in 2030", Analysis for The Danish Chamber of Commerce, March 2021

production rules and the EU taxonomy), and it should be carefully assessed if this information is nice to know or need to know for the consumer, before deciding if any additional labelling requirements should be voluntary or mandatory. For example, we believe that any further origin labelling requirements on foods, are only nice to know (thus should not be mandatory), since a local or national origin of a food not necessarily means that it is more sustainable than similar foods originating further away. Such rules also carry the risk of resulting in food protectionism and thus hamper the well-functioning of the Single Market.

The principles of information to consumers as established under the regulation on food information to consumers (FIC) need to be applied to any future sustainability information, ensuring that consumer demand is confirmed, and that the information is understandable, and non-misleading to the consumer. Furthermore, the requirements must not be so complex and detailed that they put an unnecessarily big burden on the food industry, and they should be fully harmonised ensuring the well-functioning of the Single Market.

Referring to the findings of the special Eurobarometer² we also believe that more work is needed to educate consumers on the environmental aspects of the foods they consume.

Mandatory sustainability criteria for public procurement

Europe's public authorities are major consumers making an important contribution to sustainable consumption and production therefore green public procurement, can be a strong driver to increasing the share of sustainable food, like it has already proven powerful to expand land under organic production.

The Danish Chamber of Commerce suggests that once a definition and standards for sustainable food has been set under this framework regulation, the Commission's Green Public Procurement document needs to be updated with specific fully harmonised goals and requirements for all EU member states.

Best regards,

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² Special Eurobarometer 505 - Making our food fit for the future - Citizens' Expectations