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FEDIOL preliminary input on the future Farm to Fork strategy

FEDIOL welcomes the possibility to provide preliminary feedback to DG SANTE on the upcoming Farm to Fork strategy, in the context of the Advisory group of the food chain, animal and plant health.

As we understand, the future Farm to Fork strategy will be an integral part of the Green Deal. Hence, ensuring alignment and coherence between the different pillars of the Green Deal is vital to secure a functioning system. This also requires full participation and agreement among various DGs such as DG TRADE, DG AGRI and DG GROW.

FEDIOL welcomes any policy initiatives aimed at strengthening environmental sustainability on the long term. Such initiatives, however, should not compromise European food security in the short term nor the viability and competitiveness of food processing in the EU. Overall, the Farm to Fork strategy should empower the EU to maintain or even increase its competitiveness and embrace all actors in the food and feed chain equally. In this context, education and further communication of how the EU food and feed chain model works are equally important tools to consider to further promote science-based policy strategies.

Trade considerations should be an integral part of the Strategy. The EU has already established a set of instruments in trade and international cooperation. The implementation of additional initiatives on food sustainability might be detrimental to the EU competitiveness or to our trading partners' ability to access the EU market, if not appropriately balanced and harmonised via multilateral fora. Open markets and multilateralism should remain the core approach of the EU trade strategy and not be put at risk by excessively restrictive requirements.

FEDIOL would like to highlight the following specific non-exhaustive list of issues to be considered in the development of the strategy:

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, the EU intends to implement stricter rules on plant protection products and favour alternatives to pesticides. FEDIOL can understand the need for a new policy on pesticides, given the strong public pressure. However, this should not come at all costs.

Such new policy should consider climate change challenges and its influence on pests and diseases. In this respect, the outcome of the ongoing [CLEFSA project](#) led by EFSA, which is assessing impacts of climate change related topics on the food and feed, should be considered.

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 in overall environmental performance. We can anticipate that these effects could increase as a consequence of climate change. In this context, FEDIOL members support the availability of other pesticides, alternatives or other tools, as long as based on EFSA rigorous assessment and readily provided to farmers. From experience, our sector is aware that the development of such alternatives takes time and cannot be achieved from one day to

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another. Hence appropriate accompanying programs and measures for farmers but also for other sectors like ours need to be put in place. Transition should also be provided to still enable access to raw materials from outside the EU.

Overall, the impact of further EU regulatory changes on the ability of operators to continue sourcing from global markets needs to be assessed with great care. Overlooking external effects of domestic policy initiatives risks leading to unintended consequences, such as the outsourcing of processing capacities and imports of products processed from the very same raw materials that EU operators cannot access.

Whilst we understand the need to lower the environmental impact of fertilisers and the declared ambition to reduce their use, we believe that this objective should be weighed against the need to maintain and even increase efficiency of land use, productivity of food production and circularity in the agricultural cycle.

2) New Breeding Techniques (NBTs): setting up a new policy framework open to new technologies.

Increased global demand for food, feed and renewable energy, linked to a global population increase, creates additional pressure on the EU to produce its fair share of agricultural raw materials. This challenge requires collective efforts to address diminishing or stagnating yields and tackle farmland abandonment. At the same time, climate and environmental considerations are increasing pressure to produce more food with fewer inputs. In this challenge, new breeding techniques are essential to the development of smart agriculture and sustainable intensification of production. Any assessment of the ECJ ruling on NBT needs to consider those aspects. Allowing farmers to access these new technologies is essential to provide adequate responses to climate change challenges and as such an appropriate policy framework should be put in place.

It has indeed become increasingly clear that NBTs are not adequately addressed by the EU's GMO directive as it stands today. FEDIOL believes that plants obtained with new breeding methods should not be considered under the same legal requirements as GMOs when they could also have been obtained, for example, through earlier mutagenesis techniques, traditional hybridisation methods or from spontaneous processes in nature.

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

Vegetable oils and fats can play an important role in a healthy and balanced diet. They provide essential nutrients for our body like omega 3 and polyunsaturated fats. They are also a key vector for vitamin absorption. EU labelling and nutrition policies should take into account the nutritional benefits of their use in different foods.

Customers' and consumers' concerns, preferences and requirements drive how we operate as an industry. For example, industry initiatives to define best practice for refining and reformulating oil blends have proved very effective in responding to public health concerns on trans-fatty acids (TFA) across a number of EU countries, thereby reducing TFA levels significantly.

Regulators can help consumers make healthy and informed choices through effective labelling and nutrition policies. Nevertheless, food labelling policies can be driven by considerations that go beyond health and nutrition concerns and/or scientific evidence.

Mandatory country of origin labelling on our products risks misleading consumers on a non-substantiated link between safety or quality and a specific origin. As regards vegetable oils and fats and as substantiated in past Commission work, quality is dependent on the know-how of a refiner and not on where the refining occurred.

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As regards nutrient profiles, FEDIOL awaits the upcoming Commission report on nutrient profiles which will shed light on next EU steps. Whilst FEDIOL can recognise the need for a simplified system to drive and support consumers' choices, any system should be aligned with existing international, EU and national dietary guidelines as well as EU Nutrition and Health claims. Failure to do so will lead to further confusion and provision of diverging messages to consumers. For example, as assessed in details by FEDIOL, the Nutriscore in its current format is not meeting these criteria as regards bottled vegetable oils and fats.

Any revision/reform of the existing rules on food information to consumers should empower consumers to make informed choices through more effective food labelling. In this context, the establishment of any new labelling should be carefully assessed. Similarly, existing labelling requirements should be assessed if still fit-for-purpose. The existing fully and partially hydrogenated labelling is an example of a redundant and even confusing labelling, now that the EU legislation setting a maximum level on trans fatty acids (TFA) is in force.

Last but not least, as regards obesity, this is a complex and multi-faceted issue, which include food intake but also other criteria like lack of physical activity, socioeconomic and environmental factors etc. Whilst consumption of vegetable oils and fats should be moderated to less than 30% of total energy intake in the context of a healthy diet as recommended by WHO, stopping eating vegetable oils and fats is actually detrimental for consumers' health. Vegetable oils and fats are needed as part of a healthy and balanced diet for the reasons outlined above. Hence, reformulation of final food products should rather focus on the one hand on reducing saturated fats to the level possible depending on each food product, and increase the content in polyunsaturated fats on the other hand, as recommended by WHO¹ among other.

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

The recent European Commission's Draft Delegated Decision for the uniform measurement of levels of food waste categorises the processes from the vegetable oil and protein meal industry, and from other primary processors alike, as producing food waste which should be measured across the EU. This does not reflect the realities of production for our sector, since our industry strives for resource efficiency and optimise the valorisation of raw materials by producing 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.

FEDIOL asks the European Commission to reconsider the inclusion of edible oils processing in the Delegated Act on food waste measurement published on the 3rd of May 2019, 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.

FEDIOL remains available to further discuss and intends to provide further detailed input in the next steps.

¹ WHO, Healthy Diet Factsheet, 23 October 2018. <https://www.who.int/news-room/fact-sheets/detail/healthy-diet>