



EAPF's Position on Minimum Criteria for Sustainable Public Procurement

Brussels, July 2021

The European Alliance for Plant-based Foods (EAPF) welcomes the opportunity to contribute to the Inception Impact Assessment (IIA) on minimum criteria for sustainable food procurement (SFP) under [Directive 2014/24/EU](#) on public procurement.

Public procurement is an important instrument that can (re)shape markets towards smarter, more sustainable, and inclusive trends, whilst ensuring the efficient use of public funds. Food procurement, in particular, can play a crucial role in realising the EU's ambitions for climate neutrality by 2050 and for sustainable food systems, as per the European Green Deal, the EU Farm to Fork (F2F) Strategy, and in line with the UN Sustainable Development Goals¹. To this end, public authorities and tenders should account for the economic, environmental and social impacts of food contracts.

Public procurement can significantly influence dietary habits and facilitate access to nutritious and sustainable food in public spaces (e.g. schools, public hospitals, retirement homes and so forth). Plant-based foods – made from vegetables, fruit, cereals, pulses, and fungi – can contribute to this objective, allowing to diversify diets while providing essential ingredients and nutrients (e.g. proteins, vitamins, good fats). Consumers are increasingly turning to such products out of concern for the environment, health or for ethical reasons.

Yet, tenders across Europe vastly focus on the economic aspect and settle for the most affordable offer. The selection process disregards the sustainability and nutritional diversity of diets. As a result, food procurement regularly favours common products with high environmental impacts, such as meat and dairy, and is not in line with evolving consumer demand, environmental standards, and market changes.

To strengthen the EU's position as a global leader in sustainable food systems, EAPF calls on the European Commission to include plant-based foods in the mandatory criteria for sustainable food procurement. To this end, the EU should:

- 1) Foster alignment between public procurement and the F2F Strategy;
- 2) Integrate environmental impacts of foods and diet in the cost/quality assessment of offers;
- 3) Establish a mandatory minimum threshold for plant-based foods in food procurement;
- 4) Set stronger incentives to encourage competition, especially for innovative SMEs.

¹ SDG 3 – Good Health & Well-Being, SDG 12 – Responsible Consumption & Production, and SDG 13 – Climate Action

1. Foster alignment between public procurement and the F2F Strategy

In line with the ambitions of the F2F Strategy, as well as evolving consumption habits across the EU, several Member States have committed to promoting healthier and more sustainable options, such as plant-based foods, through their national dietary guidelines. For instance, the Netherlands, Luxembourg, Finland, and Spain² recommend decreasing the consumption of meat and dairy, and increasing the intake of vegetables, fruits, cereals, and pulses. In addition, Finland specifically acknowledges the environmental and health benefits of plant-based diets.

However, unprocessed plant-based food alone cannot cover the needs of our growing population. Food processing and innovation are instrumental to making plant-based foods more accessible and affordable. Processed plant-based foods should thus contribute to the EU and national efforts to activate the shift towards more plant-based diets³ for all. They should be part of food public procurement in order to enable healthier, sustainable dietary habits.

2. Integrate environmental impacts of foods and diet in the cost/quality assessment of offers

[Directive 2014/24/EU](#) on public procurement encourages public entities to favour the most economically advantageous tender (MEAT) whilst accounting for environmental and social considerations. However, these indications are not fully implemented: in its Communication on Making Public Procurement Work in and for Europe ([COM\(2017\)572](#)), the Commission stressed that the majority of tendering procedures currently consider the lowest price as the main selection criterion.

It is essential to account for all impacts of food production and supply in the cost/quality assessment. This should entail environmental externalities, such as CO₂ emissions, water usage, food waste, and pollution. To this end, EAPF supports a common EU methodology for calculating the lifecycle costs in sustainable food procurement, as initially foreseen in the Directive.

3. Establish a mandatory minimum threshold for plant-based foods in public procurement

The EU and its Member States should actively encourage the uptake of more sustainable and diverse foods, such as plant-based foods. The Intergovernmental Panel on Climate Change (IPCC) encourages the diversification of food systems, whereby '[b]alanced diets, featuring plant-based foods, such as those based on coarse grains, legumes, fruits and vegetables, nuts and seeds, and animal-sourced food produced in resilient, sustainable and low-GHG emission systems, present major opportunities for adaptation and mitigation while generating significant co-benefits in terms of human health'⁴. The EU Farm to Fork Strategy and Europe's Beating Cancer Plan also recognise the need to shift to plant-based diets and to reduce the consumption of red and processed meat⁵.

² The Netherlands: '[Eat well with the Wheel of Five](#)' (2018). Luxembourg: '[Ernährung und Bewegung](#)' (2016). Finland, [Nutrition and Food Recommendations](#) (2021). Spain: '[Come sano y muévete: 12 decisiones saludables](#)' (2016).

³ Gibney, M. J. (2019). Ultra-processed foods: definitions and policy issues. *Current developments in nutrition*, 3(2), nzy077

⁴ [Special Report on Climate Change and Land](#). Section B. 2019.

⁵ [EU Farm to Fork Strategy](#) (2020), p.13; [Europe's Beating Cancer Plan](#) (2021), p. 11.



To fulfil this commitment, EAPF calls on the EU to **establish a mandatory minimum threshold for plant-based food in public procurement**. This would further contribute to raising awareness and educating the wider population about the benefits of healthy, sustainable and diversified diets. Moreover, it would be a vital step forward in accommodating consumers' medical needs, including intolerances, allergies, or specific dietary requirements related to diseases or medical treatments.

A starting point towards harmonised minimum criteria is represented by the staff working document 'EU green public procurement criteria for food, catering services and vending machines' ([SWD\(2019\) 366 final](#)). In the context of Green Public Procurement (GPP) it suggests several measures concerning plant-based foods, including a minimum number of plant-based dishes per week, a minimum threshold for plant-based proteins, as well as the bulking up of meat dishes with beans, grains or vegetables. While welcoming this initiative, EAPF is concerned that the SWD does not provide tangible thresholds for minimum harmonisation, but leaves the decision with contracting authorities. In the absence of concrete benchmarks, EAPF strongly encourages Member States to establish minimum criteria for plant-based food in sustainable procurement at national level.

Several Member States⁶ have already adopted such minimum requirements, namely:

- **The Netherlands.** Contractors are encouraged to provide dishes with low animal-protein content, i.e. no more than 50% of animal protein;
- **Sweden.** At least one plant-based meal should be offered in public kitchens and catering. For schools specifically, at least one dish needs to be plant-based and the school shall provide a separate salad buffet with at least five different components;
- **Finland.** Since its 2014 dietary guidelines⁷, the Finnish government recommends reducing the intake of red meat and encourages to prefer white meat, fish and plant-based proteins;
- **Denmark.** Caterers should provide plant-based meals with a certain frequency (e.g. weekly). In addition, the Danish Food Authority has introduced the Healthy Meal label which certifies that meals in public procurement are prepared according to the official nutritional guidelines;
- **Latvia.** The government has dedicated efforts to menu design in order to provide vegetarian choices and more nutritionally balanced menus in public facilities;
- **France.** In April 2021, as part of the French Climate Law, the French Parliament voted in favour of a having mandatory meat-free menu in school canteens at least once a week. The Parliament is also currently debating whether the measure should be introduced in all administrations, public establishments, as well as public enterprises, from 2023 onwards.

A common EU requirement for minimum thresholds for plant-based food would be a strong commitment to the transition towards healthy and sustainable food systems.

4. Set stronger incentives to encourage competition, especially for innovative SMEs

⁶ EPHA, '[How can the EU Farm to Fork Contribute? Public Procurement for Sustainable Food Environments](#)', December 2021; Interreg & The European Regional Development Fund, '[Baltic Sea Region Dynamic Sustainability Model for Public Procurement and Catering Services](#)'.

⁷ Ibid.



Transforming food systems further requires fostering competition on the single market. The EU and its Member States have direct interest in developing **stronger incentives for innovative food business models and SMEs**.

As pointed out by the Communication on Making Public Procurement work in and for Europe, competition in public procurement remains too low. Too many tenders receive a single bid, and the participation of SMEs remains very low, despite their growing contribution to the European economy.

Current public procurement requirements therefore hinder the selection of contracts with the best price/quality ratio and impede the emergence of healthier, more innovative, and sustainable products. **EAPF thus calls on the Commission to shape a future-proof framework for procurement, and to include plant-based food in the mandatory criteria for sustainable food procurement.**

The European Alliance for Plant-Based Foods (EAPF) brings together like-minded organisations in the plant-based value chain around a unique mission: To put plant-based foods at the heart of the transition towards more sustainable and healthy food systems. The Alliance represents the entire plant-based value chain: Food producers and manufacturers, NGOs, nutritionists, research & academia, and consumers.