

EAPF position on an EU Legislative Framework for Sustainable Food Systems

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There is growing awareness about the risks of climate change for food security. Besides this, the recent energy and food crises have further exposed the vulnerability of European and global supply chains. Indeed, the war in Ukraine has resulted in a shortage of agricultural commodities and a sharp increase in certain staple foods across Europe¹. Food systems play an important role in food security, and are currently a major driver of climate change^{2,3}, environmental degradation⁴ and biodiversity loss⁵, all of which are mainly due to the overconsumption of animal-based products such as meat and dairy^{6,7}.

Accelerating the transition towards more sustainable and resilient food systems is essential to address today's environmental, economic, and social challenges. It must include a shift towards more plant-based diets, as acknowledged in the EU Farm to Fork Strategy⁸, the EU Beating Cancer Plan⁹, and the EU Drivers of Food Security¹⁰. Dietary changes are instrumental for food systems to contribute to climate change mitigation: economic modelling shows a need for drastic changes in consumer preferences towards more plant-based, agroecological and local foods, as well as for increased investments in agri-food technology¹¹.

Therefore, the shift to more plant-based diets requires deep transformations of our production and consumption patterns. We need a sound EU regulatory framework that enables to address current barriers, namely related to financial instruments and taxation, public funding for research and innovation (R&I), investments in food technology, and consumer access at points of sales or in catering.

The European Alliance for Plant-based Foods (EAPF) sees the development of the Sustainable Food System Framework (SFSF) as a unique opportunity to build a regulatory framework that effectively accelerates the transition towards more sustainable food production and consumption, profiling

¹ European Commission, [Drivers of Food Security](#), January 2023.

² Crippa, M., Solazzo, E., Guizzardi, D., Monforti-Ferrario, F., Tubiello, F. N., & Leip, A. J. N. F. (2021). [Food systems are responsible for a third of global anthropogenic GHG emissions](#). *Nature Food*, 2(3), 198-209.

³ Clark, M. A., Domingo, N. G., Colgan, K., Thakrar, S. K., Tilman, D., Lynch, J., ... & Hill, J. D. (2020). [Global food system emissions could preclude achieving the 1.5° and 2°C climate change targets](#) *Science*, 370(6517), 705-708.

⁴ [Global Land Outlook - Second edition](#), United Nations Convention to Combat Desertification, 27 April 2022

⁵ [Food system impacts on biodiversity loss: Three levers for food system transformation in support of nature](#), Chatham House, 2021

⁶ Greenpeace. (2019). [Feeding the Problem: the dangerous intensification of animal farming in Europe](#).

⁷ [Global Land Outlook - Second edition, United Nations Convention to Combat Desertification](#), 27 April 2022

⁸ [EU Farm to Fork Strategy](#)

⁹ [Europe's Beating Cancer Plan](#)

¹⁰ [Drivers of Food Security](#), January 2023

¹¹ Rööös, E., Mayer, A., Muller, A., Kalt, G., Ferguson, S., Erb, K. H., ... & Schwarz, G. (2022). [Agroecological practices in combination with healthy diets can help meet EU food system policy targets](#). *Science of The Total Environment*, 847, 157612.



the EU as a leader on the global stage. Such framework would help level the playing field by supporting the production and uptake of sustainable foods, such as plant-based products including plant-based alternatives to meat and dairy.

EAPF welcomes the opportunity to share its views on the building blocks of the Framework: definitions, overarching principles and objectives, and governance.

» Definitions

The SFSF should provide a common understanding of key concepts and terms, starting with a definition of “sustainable food systems”. That would facilitate the implementation of the framework, based on cross-sectoral, overarching sustainability principles and criteria. It would further bring coherence to the actions of the various food system actors from the value chain.

Such definition should be easily enforceable by policymakers and food actors, and should be aligned with existing international standards. That includes the definition of the FAO according to which a sustainable food system is:

‘a system that delivers food security and nutrition for all in such a way that the economic, social and environmental bases to generate food security and nutrition for future generations are not compromised. This means that:

- *It is profitable throughout (**economic sustainability**);*
- *It has broad-based benefits for society (**social sustainability**); and*
- *It has a positive or neutral impact on the natural environment (**environmental sustainability**).¹²*

The plant-centric nature of sustainable food systems should also be a focal point of the EU definition. In the same line, definitions of “plant-based diets” and “plant-based foods” should be inclusive and take into account the wide spectrum of plant-based options that can support consumers in making the shift. EAPF proposes the following definitions:

“A plant-based diet is a diet composed of foods made from vegetables, grains, pulses, nuts, fungi, algae, including alternatives to animal-derived foods.”

“Plant-based foods are foods made from vegetables, grains, pulses, nuts, fungi, algae, including alternatives to animal-derived foods.”

¹² SAPEA: [A sustainable food system for the European Union](#), March 2020

» Overarching principles and objectives

The SFSF should set the foundations for a real transition that moves away from business-as-usual food systems and ignites new ways of producing and consuming. In this regard, there is wide scientific consensus that a shift to more plant-based production and consumption is one of the most effective actions to make food systems more sustainable and tackle their impact on climate change¹³, environmental degradation¹⁴ and biodiversity loss¹⁵, as well as on public health.

Notwithstanding scientific evidence on the environmental and health benefits of predominantly plant-based diets, animal-based foods still dominate: the ratio of animal- versus plant-based protein composing European diets is currently 58 to 42, and consumption of animal-based protein is 50 % higher than in the early 1960s and double the global average¹⁶.

Consumption habits are deeply rooted in cultural values and norms. Political action and commitment are therefore required to drive such change. As the main political actor setting the framework and goals of agri-food policies across Member States, the EU plays an essential role in enabling the dietary shift and stirring the transition, thereby reshaping market conditions for food businesses and value chains^{17,18}.

To be effective, policies should be grounded into solid EU-wide overarching principles applicable to all food actors in a systematic and equal way. The Commission is already considering essential principles (e.g., the do-no-significant-harm, the precautionary, the transparency and the polluter-pays principles). In addition, EAPF suggests including the following:

- **The principle of integration:** environmental protection requirements are integrated into the definition and implementation of EU agri-food policies;
- **The principle of fair competition:** the Framework should take into consideration the role of the EU in the global stage, including international trade and the need to ensure competitiveness of EU food system actors vis-à-vis third countries.

Principles within the Framework should also align with international commitments and strategies such as the **Sustainable Development Goals**, making sure the implementation of the measures stemming from the Framework serves the overall objective of driving sustainability at the global stage, in line with the international leadership that the EU wants to have.

While principles give a common basis to the framework, sustainability objectives represent the dot on the horizon and should underlie the Framework in order to achieve the shift towards more sustainable food systems.

¹³ Crippa, M., Solazzo, E., Guizzardi, D., Monforti-Ferrario, F., Tubiello, F. N., & Leip, A. J. N. F. (2021). [Food systems are responsible for a third of global anthropogenic GHG emissions](#). *Nature Food*, 2(3), 198-209.

¹⁴ Willett, W., Rockström, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., ... & Murray, C. J. (2019). Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. *The Lancet*, 393(10170), 447-492.

¹⁵ [Food system impacts on biodiversity loss: Three levers for food system transformation in support of nature](#), Chatham House, 2021

¹⁶ [Drivers of Food Security](#), January 2023

¹⁷ International Panel on Climate Change. (2022). [Sixth Assessment Report - Climate Change 2022: Impacts, Adaptation and Vulnerability](#).

¹⁸ NewForesight, "[A pathway to plant our future](#)", December 2022.

The Framework should therefore:

- **Integrate the three dimensions of sustainability and embed them into all EU policies.** A comprehensive regulatory framework should account for the three pillars of sustainability – economic, social and environmental – upon assessing the overall impacts of food products. This is particularly important considering that the current regulatory framework mainly focuses on economic considerations and neglects the environmental and social impacts¹⁹. That creates market distortions that feed the existing unsustainable food system where animal production and consumption are subsidised with no regard for their social and environmental implications. For instance, the Common Agricultural Policy (CAP) and EU agricultural promotion measures largely provide (financial) support intended for stimulating demand and production of those products over more sustainable plant-based foods. This goes against the objective of transitioning towards more sustainable and plant-centric food systems. **Rebalancing current incentives towards plant-based food alternatives is key to support and scale up a relatively young, innovation-driven sector with great perspectives of growth:** in fact, the industry is forecasted to value €7.5 billion by 2025²⁰, having reached a retail market value of €5.8 billion in 2022²¹, driven by growing consumer demand²². If promoted by supportive policies, the sector has the potential to drive the economic, environmental and social sustainability of the EU agri-food chain.
- **Develop a coherent regulatory framework supporting the uptake of sustainable production and consumption practices.** Alongside the introduction of new policy measures and instruments (see points below), EAPF stresses **the need to critically review existing rules and make them fit to reach the EU sustainability goals.** As a matter of fact, the current legislative fragmentation, both at EU and national level, prevents an efficient implementation of food sustainability policies and gives rise to market distortions that make sustainable foods – such as plant-based foods – less affordable and accessible to consumers (e.g., different VAT rates across EU countries²³ and other distorting taxes²⁴). In addition, the existing legislation does not provide enough support to producers in developing more sustainable products (e.g., limited R&I funding addressed to innovative sectors and products, such as plant-based foods; limited access to public financing in the form of subsidies). Therefore, introducing an overarching regulatory framework should go hand-in-hand with revising ongoing rules to stimulate and accelerate the shift towards more sustainable, plant-centric food systems.

¹⁹ [Concepts for a sustainable EU food system](#), Joint Research Centre, February 2022

²⁰ [Growth of meat and dairy alternatives is stirring up the European food industry](#), ING Report, October 2020

²¹ [Europe's plant-based food retail market insight](#), GFI Europe, April 2023

²² [Plant-based foods in Europe: What do consumers want?](#), SmartProtein project, November 2021

²³ For instance, in Italy, plant-based drinks are subject to a 22% VAT, compared to the 4% VAT of dairy milk

²⁴ As of 1 January 2024, the NL will increase the consumption tax for non-alcoholic beverages to € 26.13 per 100 liters. The scope of the tax includes all non-alcoholic beverages (incl. the majority of plant-based drinks) except mineral water, milk and soy milk.

- **Support food business operators in becoming more sustainable.** Achieving this goal requires looking at both operations and final products, taking a lifecycle approach that considers the different stages of the production process. Food manufacturers should be supported in their efforts to make their products and operations more sustainable by being able to transparently communicate these to consumers. Some initiatives are already ongoing to gather, promote and monitor the implementation of the food industry's commitments, such as the EU Code of Conduct for Responsible Businesses and Marketing Practices: the Framework could build upon these initiatives to align and consolidate such efforts.
- **Foster easier sustainable food choices by making sustainable foods the default option for consumers – including for plant-based foods.** Shifting towards more plant-based diets is an essential part of a successful transition in line with the ambitions of the EU Farm to Fork Strategy to make food systems more sustainable^{25, 26}. Yet, despite more and more people opting for plant-based foods out of medical, health, environmental or ethical reasons²⁷, meat and dairy still dominate modern diets. This imbalance needs to be readjusted by **giving plant-based foods²⁸ – including plant-based alternatives to animal-derived products – a more central role in diets**. Through the SFSF, the European Commission stands the chance to make its commitment more concrete by setting clear goals for sustainable diets. This is why EAPF calls on the EU to set a target to shift 40% of current consumption²⁹ of animal-based products towards plant-based foods – including plant-based alternatives – by 2030, as part of the overarching principles of the Sustainable Food System Framework initiative, and in line with the EAT Lancet Recommendations on Healthy Diets from Sustainable Food Systems³⁰.

» Governance

The transition towards sustainable food systems needs to take place at all levels of the value chain – from global to local. Change must be triggered and driven at global and EU levels in order to streamline and harmonise implementation at national, regional, and local levels, where many competencies on food and diets lie.

The role of the EU is crucial in guiding and coordinating efforts across Member States towards converging national initiatives to facilitate the transition. This could take the shape of **National Food Sustainability Strategies** for Member States to translate the provisions of the SFSF into national actions, according to targets set at EU level and to which EU countries should work towards based on each national specificity. Such action would harmonise individual initiatives already put forward

²⁵ IPCC Sixth Assessment Report, [Climate Change 2022: Mitigation of Climate Change](#), April 2022

²⁶ NewForesight, "[A pathway to plant our future](#)", December 2022.

²⁷ SMART PROTEIN: [Europe's plant-based food industry shows record-level growth](#), March 2021

²⁸ "Foods made from vegetables, grains, pulses, nuts, funghi, algae, including alternatives to animal-derived foods."

²⁹ Baseline: 2021 data from the [OECD/FAO Agricultural Outlook 2022-2031](#)

³⁰ Willett, W., Rockström, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., ... & Murray, C. J. (2019). Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems. *The Lancet*, 393(10170), 447-492.

by few frontrunning Member States to move towards more plant-centric food systems³¹. A monitoring and reporting process should be put in place for the EC to keep track of progress, while **a platform featuring the EC, the Member States and food system stakeholders should be established** to foster the exchange of knowledge and best practices. Such a platform should acknowledge and engage all stakeholders, in particular farmers and innovative food system actors. In fact, implementing more sustainable agricultural practices is a significant challenge that must be addressed together with those farmers who want to realise the transition from livestock to crop farming. In a similar way, food policies currently remain in the hands of a traditional food industry where innovative players e.g., actors within the plant-based value chain, are under-represented – both at EU and national levels. A **holistic and inclusive approach to stakeholder engagement** is therefore crucial for a just and effective transition towards more sustainable food systems.

Policy measure 1: Minimum sustainability requirements

Minimum sustainability requirements would be instrumental in driving the change for food products to be sustainable by design. They should be clear, realistic, consistent and science-based, and provide legal certainty to ensure a level playing field for business operators in the EU Single Market. As such, they **should be overarching and equally apply to all food system actors**.

In this vein, EAPF strongly opposes the set-up of sector-specific sustainability requirements that may stem from the implementation of the Framework. A sectoral approach risks creating unnecessary burdens for suppliers and producers serving different food sectors in the value chain. A coherent approach would facilitate collaboration and drive the transition in a more efficient and effective way. As such, should minimum requirements be set within the SFSF, those should be applied horizontally across all sectors, and equally to all processes.

Policy measure 2: Sustainability labelling

Sustainability information about food products is insufficient to guide consumers' food choices. **EAPF therefore supports a transparent, harmonised and mandatory sustainability labelling scheme, able to ensure comparability among food products that perform the same function.** To ensure a level playing field across food actors and fair competition between EU industries and third countries, such labelling should be **applicable to both domestic and imported products**. In this regard, EAPF strongly opposes:

- **The use of methodologies that rely on the composition of food products, such as the Product Environmental Footprint (PEF) tool.** As it currently stands, the PEF looks at the composition

³¹ Few best practices include:

- The Netherlands: the Dutch government took the political commitment to moving the country's animal- vs plant-based food consumption ratio from 60%-40% to 50%-50% by 2030.
- Denmark: a plant-based fund was set up allocating 168 million € to advance plant protein crop farming and plant-based food production;
- Flanders: The Flemish government took the commitment to shifting the country's animal- vs plant-based food consumption ratio from 60%-40% to 40%-60% by 2030

and manufacturing process, but is not applied across categories based on product functionality, thereby giving a distorted perception of the environmental performance of products. In fact, consumers usually tend to choose between products which are interchangeable in function (for instance, dairy milk and plant-based drinks) and not based on the composition of the products (dairy milk vs dairy yoghurt). It is therefore crucial to align the sustainability labelling scheme with consumers' purchasing behaviours, in order to adequately guide them towards more conscious, healthy and sustainable food choices, while at the same time incentivizing operators to reformulate and innovate their practices to develop healthier and more sustainable products.

- **An approach integrating different sustainability dimensions – e.g. environment, health and nutrition, animal welfare – into a single value.** Such an approach would be too simplistic and risk misleading consumers: if a product has a good nutritional value, but a negative environmental footprint, it will reflect into an average grade or value on the label, which will not transparently inform consumers about the real health and environmental performance of the product. Different aspects should therefore be presented separately in order for consumers to have a clear idea of the product's impact from an environmental, nutritional and ethical point of view.

Policy measure 3: Sustainable public procurement

Public procurement is an important instrument that can (re)shape markets towards smarter, more sustainable, and inclusive consumption patterns, whilst ensuring the efficient use of public funds. Food procurement, in particular, has an enormous potential to forge healthier dietary habits, initiating bottom-up change in public settings (e.g. schools, hospitals, universities) that can then stimulate food system actors to take action in the private sector as well as towards consumers. It must therefore be a pillar of the plan to achieve the EU sustainability goals.

EAPF supports the set-up of minimum requirements for sustainable public procurement that promote a shift towards more plant-based diets, prioritising nutritionally relevant foods while not hindering food innovation. In this regard, it is important not only to increase the offer of fruit and vegetables, but also to expand and widen the supply of other whole plant-based foods, such as legumes, whole grains, seeds, and nuts, as well as plant-based alternatives to meat and dairy. A proper solution would be **to establish an EU-wide mandatory minimum threshold for plant-based food in public procurement** that Member States would need to comply with according to the specificities of each national and local contexts, including dietary guidelines, which should be clearly linked to food policies implemented at national level³². Few options could encompass the inclusion of a minimum number of plant-based dishes per week, a minimum threshold for plant-based

³² [Plates, pyramids, planet. Developments in national healthy and sustainable dietary guidelines: a state of play assessment](#), FAO and the Food Climate Research Network at the University of Oxford, 2016.



proteins, the inclusion of a plant-based alternative in every meal (e.g. plant-based drinks alongside dairy milk).

Moreover, while EAPF welcomes the promotion of organic production via food procurement, we are concerned about some asymmetrical dispositions of the EU organic production legislation. Indeed, according to Regulation (EU) 2018/848, fortified plant-based foods are currently not eligible to organic certification while fortified animal-based products are. This contributes to an unlevelled playing field, as those products are *de facto* excluded from public food procurement in countries or regions strongly promoting organic products. EAPF sees the transition towards organic agriculture and sustainable plant-based diets as interdependent and mutually reinforcing.

We therefore call on the EU to address these legislative inconsistencies which could jeopardise the EU food sustainability goals. Allowing fortification of plant-based products would help consumers choose fortified as well as organically produced plant-based foods, and it would be in line with the already existing requirement to fortify animal feed for organic milk products.

EAPF looks forward to contributing to the development of such an important initiative, together with policymakers, likeminded stakeholders in the food value chain, and public authorities.

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 sustainable food systems, promote plant-based innovation and advance the transformation towards plant-based foods. The Alliance represents the entire plant-based value chain: Food producers and manufacturers, NGOs, nutritionists, research & academia, and consumers.