

# ENSA feedback – Sustainable Food System Framework Inception Impact Assessment

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October 2021

The European Plant-based Foods Association (ENSA) welcomes the opportunity to comment on the Inception Impact Assessment (IIA) for a Sustainable Food System Framework (SFSF).

We support the European Commission’s aspiration to develop an integrated policy framework to accelerate and facilitate the transition towards sustainable and more resilient food systems. Facing the challenges of the food system while meeting the large-scale EU’s climate and environmental ambitions will take a holistic rethinking of the ways food is produced and consumed. Against this background, it appears clear to us that **Option 4 of the IIA** is the only option that can deliver the systemic approach required.

As European producers of plant-based foods, which are used as alternatives to animal meat and dairy products, we would like to attract the Commission’s attention to certain elements which deserve careful consideration in the impact assessment.

First of all, when establishing the desired outcomes of the SFSF, it will be essential to have a science-based consensus on what a sustainable diet is. To this end, we support the **establishment of EU sustainable dietary guidelines**, which take into account both human health and dietary needs but also the environmental impacts of different foodstuffs constituting our Western diets. The contribution of the European Food Safety Authority (EFSA) will be essential to ensure these guidelines are science-based. It should be assessed whether EFSA is adequately equipped, both financially and in terms of scientific expertise, to integrate the environmental aspects in dietary recommendations, to ensure it has the means to pursue its mission with credibility and legitimacy. This will be essential for these sustainable dietary guidelines to serve as the commonly accepted compass guiding all policy actions in the SFSF and beyond.

There is no doubt that **a shift towards a more plant-based diet is a desired outcome** of a Sustainable Food System. A non-exhaustive list of scientific references supporting such a shift can be found [here](#). We therefore believe that the Impact Assessment should specifically look at the potential of the different options outlined in the IIA in achieving this shift, and its impact on all the indicators outlined in the IAA.

In particular, specific attention should be given to assessing the following aspects:

- The **effect on plant-based supply chains in Europe**, which are already under pressure as not able to cope with increasing demand for high-value plant-based ingredients of EU origin.
- The unintended consequences due to inconsistency or incoherence between different policy interventions. To give you a very concrete example: **sustainable public procurement criteria** may sometimes be incompatible, for instance rightfully requiring that plant-based products meet certain nutritional criteria such as a minimum calcium or iron content and at the same time favour organic products, whereas the EU Organic Regulation prohibits the addition of vitamins and minerals in organic foodstuffs. As a result, organic plant-based foods are legally prevented from meeting the sustainable public procurement requirements, which is obviously counter-productive.

- We welcome the fact that the IAA recognises the fact that there are market distortions due to the lack of internalisation of external costs in food prices. We believe that **all factors influencing pricing (subsidies, VAT, carbon tax** etc.) deserve to be assessed in the context of the IAA. In the case of plant-based foods, it should be noted that today they are not even on an equal level-playing-field: many Member States exclude these products from the scope of their reduced VAT rate for foodstuffs, meaning that they are subject to a higher taxation rate than alternative meat or dairy products.
- When assessing the impact of **sustainable food labelling**, we consider it out utmost important to assess the effectiveness of such schemes in nudging consumers to change their eating habits, i.e. move from one category of products to another. Comparability of claims and labels between products in different categories but used in the same way and at similar consumption moments by consumers will be key to enable them to make informed choices between two or more options and to ensure changes in purchasing decisions are not having only a marginal impact.
- Carefully evaluate how to integrate sustainability requirements with **food safety principles** to ensure that the latter remain at the core of the EU Food policy. To this end, the relationship between the General Food Law and future food sustainability requirements should be clarified.

### **About ENSA**

The European Plant-based Foods Association (ENSA) represents the interests of plant-based food manufacturers in Europe. ENSA is an association of internationally operating companies, ranging from large corporations to family-owned businesses with an annual turnover of around €1.8 billion. ENSA members produce high-quality plant-based alternatives to dairy and meat products. Since its establishment in 2003, ENSA has been raising awareness about the role of plant-based diet in moving towards more sustainable and healthier food consumption patterns.