



EPOA reaction on EC Inception Impact Assessment regarding Sustainable food system framework initiative

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The European Palm Oil Alliance is underlining the aims of the EU Green Deal to protect the health and well-being of citizens from environment-related risks and impacts. EPOA also considers a sustainable food system crucial to get to a healthy and sustainable future world. As for the use of palm oil, we promote the use of sustainable palm oil (in food products). We consider sustainable palm oil as an important ingredient to feed the world, protect biodiversity and improve socio-economic development.

- We believe it is important to have the right information about food products shared with consumers. However, effectively empowering the consumer to make a sustainable choice for complex food products can only be done provided true and honest information is shared which is not one-sided. The current (F2F related) proposal for a sustainable food labelling framework to empower consumers to make sustainable food choices needs to consider this complexity. In order to be truly sustainable, environmental, social and economic aspects should be taken into account. Erroneous information will lead to damaging diets.
- In principle a particular focus on sustainable foods is welcome. However, we have to realize that a number of food ingredients have possible multiple uses. We underline the importance to ensure coherence with all other EU food related policies (e.g. agriculture, fisheries and aquaculture) in terms of sustainability objectives, including biodiversity and climate objectives. Alignment is key since a multitude of different regulations and/or definitions about what a healthy and sustainable food product entails should be avoided. As such, the 'Sustainable Corporate Governance' and the 'Deforestation and forest degradation - reducing the impact of products placed on the EU market' proposals are relevant and should all be in line.

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- EU legislation on sustainability claims needs to be scientifically supported. The proposal is considering to reduce insufficient transparency on sustainability aspects across the food system, and the need to inform consumers enabling them to make sustainable food choices. EPOA agrees with this goal. However, as this can be considered as the heart of the proposal, it needs to be fool-proof. Information should be true and honest, unbiased. The world of food is complex and different food products cannot be compared easily. As such the idea of a sustainable diet should be combined with honest and truthful information on specific food products and/or ingredients like palm oil. If labels are going to be introduced it is necessary to build on scientific data and support from knowledgeable international experts.
- Organic is not sustainable per se. Within the F2F strategy, organic production is also considered. Very often organic is seen as 'more sustainable' per definition where there is no scientific base for this. (Actually, it is likely to be the other way around.) Possible labelling should avoid and oppose such messaging.
- European produced foods and/or raw materials are not more sustainable than food from third countries per definition. Sustainability claims should not be used as an instrument for EU protection.
- Claims shall be objective and shall not denigrate competitors, nor shall they denigrate ingredients legally used. Also we have seen detrimental effects due to so-called 'free from claims'. In the case of the free from palm oil claim, consumers are often misled about the existence of truly sustainable palm oil leading to an unwanted and unsustainable ban of palm oil. In line with this we would like to refer to current EU legislation for cosmetics on conditions for using claims. (Regulation (EU) No 655/2013), where it is stated that 'claims shall be objective and shall not denigrate the competitors, nor shall they denigrate ingredients legally used.'
- Importance of including circularity. Furthermore, we would like to include the circularity aspect. EPOA considers a circular and biobased economy as a pre-condition of a future sustainable world. This would include making optimal use of ingredients, feed and food (supply chains). It would, also increase recycling use (like from used cooking oils) to a maximum level.



- Lastly, it is important to note that sustainability is dynamic. We should not end up with tight regulation but allow flexibility to include latest scientific sustainability insights.

The European Palm Oil Alliance is a business initiative of palm oil refiners and producers. We believe that sustainably produced palm oil is a key food ingredient that fits in a nutritionally balanced diet and helps feed the world, protect biodiversity and improve socio-economic development. We push for sustainable palm oil market transformation and support initiatives committed to sustainable palm oil across Europe. We share inspiring stories about the people that make sustainability a reality.