



EPOA position regarding the ‘Sustainable Food System Framework’ initiative

Background

The European Palm Oil Alliance underlines the aim of the EU Green Deal to protect the health and well-being of citizens from environment-related risks and impacts. We need to work on improving our global environment in a sustainable manner. EPOA considers a sustainable food system crucial to get to a healthy and sustainable future world. As for the use of palm oil, we support and promote the use of sustainable palm oil (in food products, feed and oleochemicals). We consider sustainable palm oil an important ingredient to feed the world, protect biodiversity and improve socio-economic development. We also believe that honest and truthful information should be developed and shared to raise awareness and inform consumers. In order to move towards a truly sustainable future, consumers should base their choice for (food) products on complete information. We believe that current information is very often one-sided and not reflecting the complexity of our food system, which is characterized by global and mutual interconnected supply chains with equally complex interlinked challenges to address.

The European Commission has launched an initiative around a **EU sustainable food system**. This initiative is meant to make the EU food system sustainable and to integrate sustainability into all food-related policies. It will define general principles and objectives and requirements and responsibilities for all actors in the EU food system. One crucial element of this initiative is the sustainability labelling of food products.

EPOA agrees 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. Food supply chains are complex and involve many different products stemming from a large number of production areas. Especially in the case of tropical oils (amongst which palm oil) Europe is completely depending on imports from other regions to serve the needs from European food, feed, oleochemical and biobased energy markets and secure access to sustainable supplies.

The current (Farm to Fork 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. In doing so, the needs and positions of all supply chain actors (upstream and downstream) should be considered. If labelling is used, the complexity behind food supply chains should also be clear to the (end) consumer. Erroneous and/or incomplete information may lead to damaging diets and unsustainable food (choices).

Harmonization of EU proposals on sustainable and healthy food

EPOA is in favour of focussing on sustainable foods and healthy food choices.

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. We also have to realize that a number of so-called food ingredients have possible multiple uses besides food products. 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. This should also be reflected in a possible labelling of food products.

Sustainability claims need to be fact-based

EPOA believes that EU legislation on sustainability claims needs to be scientifically supported. EPOA also believes that any information to consumers should be fool-proof. Currently there is a lot of debate about what can be considered sustainable. Very often these discussions are more building on gut feeling than on solid scientific grounds. Information should be true and honest, unbiased and based on latest scientific insights. The world of food is complex and various food products may not be easily compared. 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. 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.

An absence of an ingredient does not make a product

If labelling is considered, any possible claim shall be objective and shall not denigrate competitors, nor shall they denigrate ingredients legally used.

Also we have seen detrimental effects due to the so-called 'free from claims'. In the case of the free from palm oil claims, 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 the 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.'



Organic is not always more sustainable

Within the Farm to Fork strategy, organic production is also considered. Very often organic is automatically seen as 'more sustainable' where there is no real scientific base for this. Organic production usually results in lower yields. Furthermore, organic production does not mean that no agro-chemicals are used. In addition, organic farming does not take into consideration the social aspects of sustainable production. The knowledge about organic farming and the consequences for land use, environment and livelihoods should be shared with consumers in a balanced way and perhaps even be integrated in organic requirements.

Local versus global supply chains

EPOA is worried about the trend of promoting European products only. European produced foods and/or raw materials are not by definition more sustainable than food from third countries. Sustainability claims should not be used as an instrument for EU protection. Already for centuries, the EU is depending on imports for numerous products and ingredients. This is also the case for tropical oils. Banning important ingredients like palm oil would hamper food security and may result in empty supermarket shelves and/or even less sustainable production. Consumers should be made aware of the global interdependence when choosing their foods.

Circular economy

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.