

Plantebranchen: Position on Sustainable EU Food Systems

The Danish Plant-based Business Association (Plantebranchen) welcomes the EU legislative framework on sustainable food systems as a key initiative in meeting the aspiration of the Farm to Fork Strategy and the European Green Deal as well as being instrumental in supporting advancement towards a sustainable food system transformation. In continuation, Plantebranchen welcomes the opportunity to contribute to the public consultation on a sustainable EU food system initiative as we fully support the European Commission's ambition to create a coherent framework which will ensure that foods placed on the EU market become increasingly sustainable. In summary, Plantebranchen calls on the European Commission to consider a holistic approach to sustainability that supports the uptake of sustainable production and consumption practices and fosters a level playing field when developing the framework.

Below, Plantebranchen will provide our remarks on the Sustainable Food System and elaborate our position on our desired format of a future framework. Further, Plantebranchen would like to take the opportunity to expand on our answers provided in the survey. When developing the framework, Plantebranchen encourages that the following is considered:

1. A harmonized definition of sustainable food systems
2. A holistic approach to sustainability
3. A coherent regulatory framework supporting a sustainable transition

(1) A harmonized definition of sustainable food systems

To ensure that the challenges of sustainable food systems are addressed comprehensively, Plantebranchen encourages that the starting point for the EU framework should build on the definition of a sustainable food system provided by Science Advice for Policy by European Academies (SAPEA):

“A sustainable food system for the EU is one that provides and promotes safe, nutritious and healthy food of low environmental impact for all current and future EU citizens in a manner that itself also protects and restores the natural environment and its ecosystem services, is robust and resilient, economically dynamic, just and fair, and socially acceptable and inclusive. It does so without compromising the availability of nutritious and healthy food for people living outside the EU, nor impairing their natural environment [\(SAPEA, 2020\)](#)”

Plantebranchen believes that a common starting point with a harmonized definition of sustainable food systems is necessary to drive the comprehensive transition towards increasingly sustainable food products on the EU market. A strong legal framework based on such common and harmonized definition is essential in addressing and accommodating today's food system challenges.

(2) A holistic approach to sustainability

In continuation of the importance of building the framework on a harmonized definition of sustainability, it is further of urgency to adopt a holistic approach to sustainability that considers all three pillars: economic, social, and environmental sustainability. When assessing the sustainability of a food product, it is of the essence to properly consider all three dimensions holistically to avoid potential market distortions that would favor less sustainable food products.

(3) A coherent regulatory framework supporting a sustainable transition

To ensure long term value of the framework, it is essential to develop a framework that acknowledges the current regulatory obstacles and directly supports the uptake of sustainable production and consumption patterns. To ensure that the framework is aligned with the objectives stated in the Farm to Fork Strategy and the European Green Deal, Plantebranchen strongly encourages that efforts are made for the framework to become an enabler for a level playing field. It is relevant that the framework recognizes the critical role of all food groups, including plant-based foods and drinks, in fulfilling the objectives and supporting the sector's sustainability transition.

Despite a growing demand for plant-based foods, hurdles to market access remain; hurdles that become increasingly visible when reviewing the current regulatory and market barriers that hinders the uptake of sustainable foods. To ensure fair and open market competition between sustainably produced animal-based and plant-based foods on the EU single market it is central to ensure equal level playing field conditions. The importance is further emphasized by virtue of the role that plant-based diets play in the Farm to Fork Strategy and the European Green Deal:

“Moving to a more plant-based diet with less red and processed meat and with more fruits and vegetables will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system” [\(source\)](#).

As a highly relevant and urgent example, it becomes evident that outdated legislation is currently in place that disincentives sustainable production and consumption. In relation to plant-based foods and drinks, the market potential is restrained by the current uneven playing field with the animal-based sector, particularly in relation to organic certification.

In this context, it is relevant to highlight the urgent need for EU's organic legislation to facilitate fortification of plant-based drinks. At present, the EU legislation on organic production does not allow fortification of vitamins and minerals in organic plant-based drinks. Again, in line with the European Green Deal, it is an aim to promote and increase organic and plant-based foods and diets in order to make Europe a more sustainable continent. To achieve this, it is essential to minimize obstacles for consumers to consume sustainably. As a relevant example, Lithothamnium calcareum, an alga naturally rich in calcium, should be used in the production of organic plant-based drinks to make them a valuable source of calcium and thus a viable alternative to cow's milk. This is an important focus point to ensure that the transition towards organic agriculture does not counteract with the transition towards sustainable plant-based diets.

Plantebranchen strongly encourages that the Litho algae is not to be treated as calcium fortification. We advocate for the use of this algae in organic foods and drinks given our organizations' strong belief that organic plant-based drinks should be able to provide a source of calcium for consumers abstaining from animal-based products for various reasons. In conclusion, allowing fortification with the Litho algae is an important initiative to ensure a level playing field as there - to our knowledge - is currently no other method available with the same beneficial outcome. Revising the EU organic legislation in this regard would be an important step in ensuring a coherent regulatory framework.

General remarks on the public consultation survey

Further, Plantebranchen welcomes the opportunity to elaborate on certain answers provided in the survey with the aim of clarifying and giving more nuance to our answers:

Definition and principles of the framework

Relevant to all questions

A prerequisite to respond to several of the questions in the survey is a common understanding of the definition and principles of the framework. As the survey does not contain questions to establish such a common understanding, some questions are challenging to provide satisfactory answers to.

The important role of the political institutions

Particularly relevant to question 3

Based on the belief that most food actors experience hurdles in transitioning towards more sustainable food systems, Plantebranchen believes that a key role is played by political institutions especially at EU and international level. In this regard, Plantebranchen works closely with relevant stakeholders to encourage political will as this is fundamental in triggering much-needed change along the entire food value chain.

Ensuring a level playing field

Particularly relevant to question 8

As already described as part of point (3) when arguing for the need of a coherent regulatory framework supporting a sustainable transition, Plantebranchen would in this regard like to highlight the need for bringing coherence between all policies affecting food. To harness the potential of the framework to be a turning point for EU food systems and to ensure a level playing field, Plantebranchen opposes the setup of sector-specific sustainability requirements. Rules should be overarching and apply equally for all. Only this way can the framework contribute to facilitating and encouraging a shift towards more sustainable - and plant-based - diets aligned with the objectives stated in the Farm to Fork Strategy and the European Green Deal.

The role of cultural and culinary habits in the promotion of plant-based foods

Particularly relevant to question 9

The role of cultural and culinary habits in a sustainable food system transformation is relevant for Plantebranchen to highlight and discuss. Plant-based food products can play an important role in inspiring behavioral change among today's consumers - and consumers to come; behavioral change with positive consequential impact on the health of people, societies and planet. An increased offer of plant-based foods will contribute to diversifying the assortment of sustainable foods available to consumers and support consumers who are seeking to adopt a more plant-based diet. It is very positive that many plant-based products can merge into consumers' existing consumption patterns without consumers needing to drastically change their habits.

Sustainability information on food products

Particularly relevant to question 16

To guide consumers effectively to adopt more sustainable consumption patterns, Plantebranchen supports a clear and user-friendly sustainability label that allows consumers to compare products within the same functional categories. As an example, such sustainability labels will allow the consumer to compare dairy milk and plant-based drinks; two products within the breakfast drink category that hold similar functionality and use. To date, sustainability labels are insufficient in achieving this objective as they are currently neither reliable nor clear and effective in guiding consumers.

Minimum requirements for sustainable public procurement

Particularly relevant to question 20

Plantebranchen welcomes the role that sustainable public procurement plays in driving the transition. Setting minimum requirements for sustainable public procurement can contribute to promoting the uptake of more sustainable foods and drinks, including plant-based products. It is highly relevant to expand the offer of not only fruits and vegetables but likewise of legumes, whole grains, seeds, and other whole plant-based foods.

Further, Plantebranchen would like to raise concern about the focus on organic products. As already described as part of point (3) when arguing for the need of a coherent regulatory framework supporting a sustainable transition, fortified plant-based foods and drinks are currently not eligible to organic certification according to the Regulation (EU) 2018/848. For this reason, the products do not hold the same entitlement as their animal-based alternatives in countries that strongly promote organic products in their public procurement. Plantebranchen encourages that these legislative inconsistencies be addressed to ensure equal level playing field conditions.

Focus on a balanced and varied diet

Particularly relevant to question 21

Instead of targeting food categories based on an absolute assessment of their nutritional values, Plantebranchen proposes that the role of a food product is assessed within a balanced and varied diet. In continuation, Plantebranchen would like to raise concern about the targets for added salt, sugar, and fats regarding ultra-processed foods. We believe that

the inconsistent use of the term “ultra-processed” has misleading implications on the consumer’s perception of foods. Plantebranchen shares the viewpoint that the healthiness of a food product is not determined by the level of processing but is rather attributed to the product’s nutritional composition and quality of the raw materials. In fact, food processing is key to facilitating the dietary shift towards healthier and more sustainable food systems as it allows for the production of plant-based products that consumers can easily integrate into their existing habits. On this basis, Plantebranchen opposes targets linked to the concept of ultra-processed foods.

Balancing nutritional value and environmental impact

Particularly relevant to question 22

Finally, Plantebranchen wishes to encourage that nutritional value and environmental impact is addressed comprehensively and that both aspects are considered when promoting sustainable products. This is highly relevant to avoid the promotion of food products that may be nutritionally dense but insufficient or even detrimental from an environmental perspective.

Plantebranchen looks forward to contributing to this important consultation.

With more than 70 members spanning the entire food value chain, The Danish Plant-based Business Association represents the voices of the industry’s frontrunners aiming to radically change the food system and drive a transition towards a more plant-based diet. Together, we strive for political influence, market development and community building along the food value chain to achieve our common vision of making the world greener through food.

For more information, please visit www.plantebranchen.dk