

16 March 2020

## UNESDA SUBMISSION TO THE CONSULTATION ON THE ROADMAP FOR THE EU FARM TO FORK STRATEGY ON SUSTAINABLE FOOD

### Overview of UNESDA

- UNESDA - Soft Drinks Europe is the Brussels-based trade association representing the non-alcoholic beverages sector, representing European producers of soft drinks including carbonates, still drinks (e.g. ice teas), energy drinks and fruit-based drinks.
- The [membership of UNESDA](#) comprises 23 national beverages associations and 9 companies with operations in several member states.
- The EU soft drinks sector is rooted in the European economy and society throughout its €185 billion value chain - employing 1.7 million people throughout its value chain, and with 424 soft drinks production and bottling plants.

**UNESDA supports the input to this consultation provided by our umbrella association FoodDrinkEurope. In this present submission, UNESDA places emphasis on some of the key aspects of major importance and relevance to the EU soft drinks sector.**

As background, we consider it important to stress that UNESDA members very much support the importance of balance and moderation in promoting healthy lifestyles and are proud to have taken long-standing self-regulatory commitments in relation to several of the measures highlighted by the 2019 OECD report ([‘The Heavy Burden of Obesity – the economics of prevention’](#)) such as:

\* providing full calorie and GDA (now RI) labelling since 2008 – far ahead of EU legislative requirements;

\* not advertising soft drinks to children under 12 since 2006 – not on TV, in print or online (and since 2011 not on social media or company websites);

\* in EU primary schools – not offering any of its products for sale;

\* in EU secondary schools – offering only low and no calorie soft drinks for sale and placing them in non-branded vending machines; and

\* reducing added sugars in its products by an average of 10% between 2015 and 2020, by increasing efforts on reformulation and new product innovation – with the use of low-and no-calorie sweeteners serving as a key tool for this achievement.

## 1. UNESDA's general comments on the Farm-to-Fork Roadmap

**UNESDA welcomes the European Commission's ambition as set out in the Roadmap** to the Farm to Fork Strategy to achieve a more sustainable food system including stimulating sustainable food processing and facilitating the shift towards healthy, sustainable diets.

**++ UNESDA is keen to play a constructive and pro-active role in transitioning towards a sustainable food system by taking an active role in stakeholder dialogue on designing and implementing the strategy.**

**UNESDA considers that a multi-faceted approach involving all stakeholders is the most efficient way to address healthy diets instead of just focusing on one specific element**

**++ Overweight and obesity are complex issues with multi-factoral causes requiring a coordinated, multi-stakeholder approach with governments, industry, the healthcare community and civil society working together.**

**UNESDA calls for a convincing science- and evidence-base**

It is the strong belief of UNESDA that sound science and a convincing evidence-base must serve as the bedrock for any sustainable food system. We therefore call upon the European Commission to ensure that any measures proposed under the Farm-to-Fork Strategy – whether legislative or non-legislative – are based on relevant, robust evidence and science

**++ UNESDA call upon all actors in designing and implementing the Strategy, whether at EU or national level, to ensure the upholding of EFSA's scientific advice and that, in general, the Strategy is grounded in sound science so that specific foods or ingredients are not unjustifiably discriminated.**

**++ UNESDA urges the European Commission to support - and work with - Member States in conducting dietary intake surveys to underpin any recommended policy interventions.**

**UNESDA calls for a harmonized approach: A pan-EU sustainable food system**

As highlighted by FoodDrinkEurope in their comments, the sustainability of food systems does not stop at EU internal borders and can only be achieved in the context of a strong Single Market with support from all Member States. Fragmentation of the EU Single Market contributes to additional costs, burdens and inefficiencies - and does nothing to support EU competitiveness.

**++ UNESDA calls upon the Commission to give due consideration to the considerable costs resulting from fragmentation – as exemplified by the plethora of member states' initiatives on front-of-pack nutrition labelling.**

## 2. UNESDA's specific comments on the Farm-to-Fork Roadmap

### **HEALTHY DIETS = THE EASY CHOICE**

*“The overall objective of the strategy is to accelerate the transition towards a sustainable food system that ... creates a food environment which makes healthy diets the easy choice for EU citizens” (Roadmap, section B)*

UNESDA fully agrees with the over-arching strategy outlined in the Roadmap that one of the most important and effect strategies to fight against overweight and obesity is to create a food environment that makes *“healthy diets the easy choice”*.

#### **Sugar/calorie reduction**

The soft drinks industry has been reducing sugar and calories in its products since the 1970s when the first no- and low-calorie drinks were introduced. Most recently, the sector reduced average calories by a further 11.9% between 2015-17 – well ahead of its pledge of 10% by 2020. To date, the soft drinks industry remains the only sector to have officially committed to the EU's 10% added sugar reduction target by 2020 (as laid out in the EU sugar reduction annex). Today some 25% of soft drinks sold across Europe contain no calories – rising to 40% in some countries.

The industry is committed to continuing its sugar and calorie reduction journey through reformulating existing products, innovating to develop new products with lower sugar profiles, placing promotion behind no/low calorie options to nudge consumer behaviour, and reducing pack sizes to help portion control. When it comes to reformulating for sugar reduction, there is a need for gradual efforts taking into consideration consumer acceptance, tastes and preferences.

**++ UNESDA calls upon policymakers to maintain momentum and create opportunities to generate critical mass in driving sugar and calorie reduction across food and drink products, while acknowledging the crucial role that food additives, approved for use in the EU, have to play in these efforts to reduce sugar and calories.**

#### ***Low-calorie sweeteners: Reputable evidence and science must be part of the conversation***

UN members have urged the private sector to contribute to reducing the risk factors for NCDs by *“reformulating products to provide healthier options that are affordable and accessible ...”*.

The soft drinks industry has responded by intensifying innovation efforts on reformulating to offer consumers an ever-widening choice of no- and low calorie drinks, as well as a range of different sweetness levels.

Low-calorie sweeteners are a key tool for the soft drinks industry to support this global health objective. It is therefore crucial for the European consumer to be fully confident in the use of low-calorie sweeteners once they have been evaluated as safe by EFSA and

then authorised for use by the European Commission.

**++ To sustain and scale up calorie- and sugar-reduction efforts, UNESDA looks forward to the European Commission taking a more active role in balancing the public conversation on the safety and benefits of low and no calorie sweeteners. Reputable evidence and science must always be part of the conversation around any EU-approved food ingredients.**

## **IMPROVED FOOD INFORMATION**

*“To promote sustainable food consumption, the Commission will, amongst others, propose actions to help consumers choose healthy and sustainable diets by providing better food information such as where the food comes from and its nutritional value” (Roadmap, section B)*

### **Nutritional labelling**

UNESDA members have committed to providing full Guideline Daily Amount nutritional information front-of-pack since 2006. Since then, many other front-of-pack nutrition labelling schemes have been developed and are used across the EU. The proliferation of differing schemes adds to consumer confusion and the complexity for businesses. We fully welcome the ambition of the European Commission to harmonize front-of-pack labelling.

**++ UNESDA is supportive of the establishment of an EU-wide, harmonized front-of-pack nutrition labelling system that is meaningful, informative and relevant to consumers, has the potential to be scaled across the EU, is developed based on an EU governance model and is in line with EU legislation. UNESDA looks forward to working with the European Commission and other stakeholders to develop the most appropriate system of front-of-pack nutrition labelling.**

### **Towards more holistic consumer information**

We are fully supportive of exploring more holistic consumer information systems, covering not only nutritional information but also environmental- and sustainability-related aspects.

**++ UNESDA calls upon the European Commission to work with stakeholders, including UNESDA, to explore effective off-label information systems via digital means, such as by smartphone applications. Not only will this meet consumers’ increasing desire for digital information but will also be necessary due to space constraints on labels.**

**++ Environmental and sustainability information must enable consumers to make responsible and confident decisions. We call for a harmonised approach at EU level, with a strong scientific basis - along the lines of the existing Product Environmental Footprint methodology - for further defining footprint of various food and drink products.**

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