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INCEPTION IMPACT ASSESSMENT CONSULTATION: SUSTAINABLE FOOD SYSTEM FRAMEWORK INITIATIVE

A. Introduction and background

UNESDA Soft Drinks Europe welcomes the opportunity to provide input on the European Commission's Inception Impact Assessment on the Sustainable Food System Framework Initiative.

For the last 15 years or so, UNESDA has demonstrated their members' resolve to create a more sustainable future by making a series of ever more ambitious commitments¹. These include three successive sugar reduction commitments and a ground-breaking commitment not to market any type of soft drink to children.

UNESDA has recently reinforced its voluntary actions by way of a robust contribution to the recently adopted EU Code of Conduct for Responsible Business and Marketing Practices². This includes yet a further commitment for an average 10% sugar reduction by 2025.

B. Seven guiding principles for creating an EU Sustainable Food Framework Initiative

UNESDA believes that closely adhering to the set of core guiding principles outlined below will be essential to build a durable, credible, workable and successful EU sustainable food system framework.

1. EU-wide definition of 'sustainable food system'

UNESDA proposes that the EU sustainable food system framework initiative is based around the widely accepted definition for a 'sustainable food system' as laid down by the UN FAO. This clearly sets out the three dimensions for creating a sustainable food system³:

UN FAO definition for a 'sustainable food system'

« On the economic dimension, a food system is considered sustainable if the activities conducted by each food system actor or support service provider are commercially or fiscally viable. The activities should generate benefits, or economic value-added, for all categories of stakeholders : wages for workers, taxes for governments, profits for enterprises, and food supply improvements for consumers.

On the social dimension, a food system is considered sustainable when there is equity in the distribution of the economic value added, taking into account vulnerable groups categorized by gender, age, race and so on. Of fundamental importance, food system activities need to contribute to the advancement of important socio-cultural outcomes, such as nutrition and health, traditions, labour conditions, and animal welfare.

¹ <https://www.unesda.eu/responsible/>

² <https://www.unesda.eu/new-health-nutrition-commitments/>

³ [FAO publication](#) "Sustainable food systems Concept and framework", 2018

On the environmental dimension, sustainability is determined by ensuring that the impacts of food system activities on the surrounding natural environment are neutral or positive, taking into consideration biodiversity, water, soil, animal and plant health, the carbon footprint, the water footprint, food loss and waste, and toxicity. »

2. Combination of mandatory and voluntary approaches

UNESDA strongly believes that the quickest and most effective route towards achieving greater sustainability in the EU food system would be achieved via a combination of mandatory/legislative and voluntary/self-regulatory initiatives.

As a flagship initiative of the EU's Farm to Fork Strategy, the recently adopted EU Code of Conduct for Responsible Food Business and Marketing Practices has proven to be an effective means of swiftly bringing food business operators around the table to commit to an impressive range of voluntary commitments to build more sustainable food systems.

3. Food safety to continue to be the foundation of EU food policy

Food safety, legislated at framework level by the EU General Food Law 178/2002, must continue to be the foundation of EU food policy, taking precedence over sustainability aspects.

4. A strong science- and evidence-base is essential to foster credibility

Any provision proposed in the context of this framework initiative should be underpinned by strong science and evidence. For instance: a) methodologies for any sustainability analysis should always be based on strong evidence; and b) improved collection of dietary intake data is required to provide a better understanding of what people actually consume.

5. Sustainability rules, criteria and analysis to be evidence-based, centralized, harmonised, clear, realistic and proportionate

To avoid unnecessary delays, risking the free movement of goods and creating additional costs for businesses, the body eventually mandated with carrying out sustainability analysis should ensure centralised and harmonised decisions applicable in all Member States.

Furthermore, it would be appropriate that the above-mentioned body should support in establishing the relevant criteria applicable to all food business operators. Clearly defined, harmonised sustainability criteria will be required to ensure a level playing field.

Sustainability analysis should not determine whether a food can be placed on the market but should instead be used to incentivise food businesses to improve the sustainability of their products and, eventually, to inform consumer choice. For example, the approval of substances, such as food additives, should continue to be based on food safety. Sustainability analysis should complement the approval process, but not be an integral part of it.

Any envisaged 'minimum requirements' and incentives should be centralised and harmonised and based on science and evidence. They should be voluntary, clear, and easy to use for food business operators.

When it comes to sustainability labelling, there should be no required pre-authorisation.

6. Gradual transition towards sustainability with appropriate transition periods

A key principle in building a more sustainable food policy framework is to secure a phased, gradual approach. Appropriate transition periods will be crucial to facilitate the journey for all actors in the food chain in building an increasingly sustainable food system.

7. A single EU-wide monitoring framework: EU Code of Conduct scheme

The monitoring scheme developed for the EU Code of Conduct for Responsible Food Business and Marketing Practices should be considered as the mechanism to monitor and evaluate progress towards an effective transition to a more sustainable food system. This will avoid duplication and additional burdens for those food business operators who signed up to the Code.

For any questions or comments, please contact Helen Benson, Scientific & Regulatory Affairs, UNESDA:

Tel: +32 476247464 hbenson@unesda.eu