

Feedback on the European Commission Roadmap for the initiative ‘[Sustainable EU Food Systems](#)’

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The Good Food Institute Europe welcomes the opportunity to provide feedback on the roadmap of the European Commission’s new initiative for Sustainable EU Food Systems. We appreciate the Commission’s thoughtful approach of considering different policy options outlined in the roadmap.

Making the food we eat more sustainable is at the heart of the European Green Deal and Farm-to-Fork Strategy which explicitly recognises¹ the transformative potential of alternative proteins – including plant-based, microbial, algae, and other meat substitutes – to make our food system more sustainable, healthy, and secure.

Recognising the enormous challenge to transform the European food system and bring it in line with the European Green Deal, we support policy option 4 outlined in the roadmap – a new comprehensive framework legislation on the sustainability of the Union food system – as the potentially most transformative approach.

Such a framework must facilitate the shift towards more health and sustainable food products that are affordable, accessible and appealing to consumers. While the Farm to Fork Strategy recognises the need to substantially reduce the amount of meat we eat, EU meat consumption is estimated to stay stable at high levels, decreasing by only 1.5% in the next decade². Producing meat from plants or growing it directly from animal cells enables consumers to make more sustainable food choices by giving them the products they love, but made more sustainably. To make sure these sustainable proteins reach their full potential, Europe must

¹ [Farm to Fork Strategy](#), European Commission 2020, p15

² [EU Agricultural Outlook](#), European Commission, 2020, p36

support these industries in their goal to reach price and taste parity. This can be achieved through investment in R&D, a clear regulatory path-to-market, and fair labelling rules.

Regardless of which of the policy options outlined in the roadmap the Commission will pursue, with regard to the different indicative elements outlined in the roadmap **the Commission ought to take the following principles into account that are further explained below: 1) Taking a holistic view of environmental sustainability, and 2) Creating a truly level playing field for all food categories.**

1) Taking a holistic view of environmental sustainability

It is important that new definitions and labelling for environmentally sustainable food take into account a diverse set of environmental dimensions, including climate change, deforestation, biodiversity loss, and local air and water pollution. Such a holistic understanding is vital in order to avoid unintended consequences that could result from a more narrow focus on too few dimensions.

For example, farmed fish has a similar carbon footprint to pork. But eutrophying emissions — runoff of excess nutrients into surrounding waterways — are much higher for farmed fish than pork³. Leaving out the dimension of water pollution would deprive consumers of crucial information about the relative environmental sustainability of fish and pork.

2) Creating a truly level playing field for all food categories

Any approach to introducing mandatory front-of-pack sustainability labels, minimum sustainability standards, or common definitions of sustainable food products must have a maximally wide scope. It cannot be limited to only certain food categories. Exempting some categories or subcategories of foods would introduce unintended consequences that could actually lead to more harm to the environment and would be in direct contradiction to the objectives of this initiative.

A comprehensive analysis of global environmental footprints shows⁴ that some foods have an impact multiple orders of magnitude higher than others across multiple environmental impact categories (carbon emissions, land use, water use, eutrophication). In order for those differences to be reflected in definitions or labelling of sustainable foods, these categories need to be within the scope of such rules.

³ Data compiled and visualised by [Ritchie & Roser 2020](#); Data source: [Poore & Nemecek 2018](#)

⁴ Ibid.

The Farm to Fork Strategy acknowledges⁵ the need for a dietary shift towards more plant-based foods both on the grounds of sustainability and health. For consumers to make informed choices about the sustainability implications between plant-based and their animal-based counterparts, both need to be subject to the same sustainability rules.

Thank you for considering this submission. For further information or a more detailed discussion, please do not hesitate to reach out to Alex Holst, Policy Manager at the Good Food Institute Europe, at alexh@gfi.org. Thank you!

The Good Food Institute Europe is an international NGO helping to build a more sustainable, healthy and just food system by transforming meat production. We work with scientists, businesses and policymakers to advance plant-based and cultivated meat, eggs, dairy and seafood – making them delicious, affordable and accessible across Europe. We believe that making meat from plants and cultivating it from animal cells is fundamental to addressing climate change, improving public health and reducing animal suffering.

⁵ [Farm to Fork Strategy](#), European Commission 2020, p14