

# SUSTAINABILITY OF THE EUROPEAN FOOD SYSTEM

THE EU STARCH SECTOR VISION FOR, AND EXPECTATIONS OF, A CONSTRUCTIVE SUSTAINABLE FOOD SYSTEMS FRAMEWORK LEGISLATION

SUMMARY | JULY 2023



# 1. INTRODUCTION

In late 2023, the European Commission is due to publish its proposal for a legislative framework on sustainable food systems (FSFS). This proposal, once adopted, will likely provide the framework for a multitude of specific actions to help promote a sustainable food system going forward for years to come. It is of paramount importance to get that right.

This paper aims to demonstrate the substantial contribution so far of the EU starch industry to a sustainable food system, as well as what core needs our sector has for that contribution to continue, and even increase.

The European starch industry, a signatory of the EU Code of Conduct for Responsible Food Business and Marketing Practices, is a central actor in today's agrifood sector, and a key enabler of the transition to a more sustainable food system. Starch biorefineries across the EU not only provide direct employment in rural areas to roughly 16.000 people, and helps secure the livelihood of roughly 60.000 farmers through the processing of nearly 25 million tonnes of EU-grown agricultural raw materials to produce 600 high quality ingredients. They also that serve all outlets of the bioeconomy, which allows the industry to be near zero-waste, to adapt to shifting society demands, and helps its customers be more sustainable every day.

# 2. OUR VISION AND NEEDS

For EU starch producers to further develop their contribution towards a more sustainable food system, and for the FSFS to fulfil its objectives of accelerating the transition and promoting policy coherence, it is vital that the following core principles are adhered to by EU Policy Makers

## A. Recognising the importance of our ingredients to European diets and overall sustainability

EU policy makers should recognise and acknowledge the key contribution of the many ingredients of the EU starch industry both to EU consumers' diets, and to food system sustainability more broadly. From essential carbohydrates, through sugars and low-calorie sweeteners, to plant-based proteins and fibres, starch producers deliver safe, high-quality, and essential ingredients which contribute to a more balanced, nutritional and innovative diet for EU consumers. Policy makers should avoid misinformation or ambiguous messaging in their communication, and EU legislation and communication should remain soundly grounded in robust science, conducive to innovation, and supportive of the introduction of innovative ingredients and technologies.

## B. Understanding the critical interlinkage of the EU bioeconomy and sustainability in our food system

It is fundamental that EU policymakers take into account, in future legislative proposals, the importance of the inextricable interlinkage between the sustainability of the food system and a vibrant EU Bioeconomy. Help, support, and promotion of the bioeconomy is essential to make our food system more sustainable, and it is vital for policy makers to view sustainability holistically and to avoid creating artificial conflicts between food and non-food uses of agricultural raw materials.

## C. An EU Protein Strategy to ensure resource diversity and increased autonomy

An ambitious EU Protein Strategy should be developed and implemented, hand-in-hand with this Framework (FSFS). This must help fully realise the potential of EU-grown plant proteins, if we hope to not only offer better variety and diversity of proteins in our diets as a source of increased sustainability, but simultaneously increase the resilience of the food system, including through a rules-based international trade system, to strengthen food security.

## D. The global dimension

While the starch sector, like other actors in the Agrifood chain have shown incredible resilience, continuing to produce and supply food & drink to EU consumers even through recent crises, the strain on our sector has been heavy. It is important that measures continue to be taken to guarantee our competitiveness and protect the EU agrifood chain from international competitors who do not suffer the same constraints, thereby better levelling the playing field.

## E. Investment to support sustainability

The EU Farm to Fork strategy has set extremely ambitious sustainability targets, but has, thus far, not always matched these targets with either the policy support or financial support needed for their implementation. Support to innovation will be key to giving both EU farmers and primary food processors, like starch producers, the necessary tools to help them achieve the sustainability and decarbonisation targets which have been set, and the overall transition to a more sustainable food system. On top of existing financial support linked to, inter alia, the EU Bioeconomy Strategy and EU Green Deal Industrial Plan, this could include a dedicated EU Food Investment and Resilience Plan to help our industries manage, and invest for, this transition.

## F. Coherence and long-term policy predictability

It remains fundamental for all stakeholders in the AgriFood value chain to have both short- and long-term clarity on the policy framework in which they operate. It is therefore of paramount importance that EU policy makers ensure coherence when developing this Framework (FSFS), notably with the principles General Food Law (Regulation 178/2002), to ensure that a balanced approach between the sustainability goals remains the norm. This requires the continued reliance on a balanced risk-based approach. Disproportionate and unbalanced approaches risk leading for example to food loss or waste, and unnecessary economic losses. It is equally critical that EU-wide solutions be sought, to ensure the safeguarding of the EU Single Market. Relying on Member States for national implementation plans could do untold damage to the integrity of the Single Market.

Finally, all stakeholders must continue to be part of the decision-making process, rather than resorting to unpredictable, unilateral Delegated Acts as a means to design the policy framework for the future.

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