

APRIL 2026
POSITION PAPER

EU-GROWN SOLUTIONS FOR EUROPE'S PROTEIN AMBITIONS

RECOGNISING THE ESSENTIAL ROLE OF **STARCH BIOREFINERIES**
IN THE EU'S PROTEIN STRATEGY AND BEYOND

| EXECUTIVE BRIEF

- » The EU's protein strategy aims to strengthen food security, sustainability and protein autonomy, with a balanced approach to plant-based and animal proteins.
- » The starch industry is a key contributor to this strategy, as it co-produces large volumes of plant-based proteins from EU-grown crops through circular biorefineries, without requiring additional land.
- » By linking farmers to food and feed markets, starch processors enhance EU resilience, reduce import dependence, and support rural economies.
- » We ask for the recognition of processors as key actors in the EU Protein Strategy, ensuring a competitive and innovation-friendly framework, and alignment of protein policy with the EU bioeconomy and competitiveness agenda.

| INTRODUCTION

The European starch industry is a cornerstone of the EU bioeconomy and a strategic contributor to Europe's resilience and increasing protein autonomy, as it produces more than 1 million tonnes of high protein content products each year for the food and feed markets. In a highly competitive global environment, ensuring that Europe's processing sector remains innovative and cost-competitive is essential to making affordable, sustainable plant-based foods available to consumers.

Through a proven near zero-waste circular biorefinery model, our sector transforms every component of EU-grown crops such as wheat, corn, and potatoes—carbohydrates, proteins, and fibers—into high-value ingredients. This includes high-quality plant-based proteins produced without requiring additional land. As longstanding partners to European farmers, we provide stable outlets, support crop rotation and soil health, and strengthen rural economic resilience. In doing so, starch processors act as a bridge between farmers and the food and feed sectors, creating diversified markets for EU-grown raw materials.

As the EU prepares its 2026 EU Protein Strategy, alignment with the Bioeconomy Strategy and the broader innovation and competitiveness agenda will be essential. A balanced approach that supports both animal and plant-based proteins—working with and for farmers—will best strengthen EU food security, competitiveness and sustainability. Processing is central to this ambition: competitive biorefineries are indispensable to scaling production, enhancing nutrient density, improving functionality and ensuring food affordability.

Starch Europe offers a unique dual contribution:

- » Expanding high-quality, nutritional and functional plant products with high protein content for human diet (from bakery and specialised nutrition to sports, infant, and elderly nutrition)
- » Supplying a reliable, homegrown stream of high-quality nutritional and functional high protein content products for specialised feed (aquaculture, pet food, young animal food)
- » Producing medium protein content products as feed material (such as corn & wheat gluten feed) for livestock.
- » Providing carbohydrates as essential feedstock for the production of fermentation proteins.

This complementarity strengthens EU food security, contributes to strategic autonomy by reducing import dependence, and supports climate, circularity and biodiversity objectives.

To unlock the full potential of this EU-grown protein success story, Europe must ensure a predictable, innovation-friendly and competitive policy framework that allows processors to scale up production, invest, and continue driving value for farmers, consumers, and the wider bioeconomy.

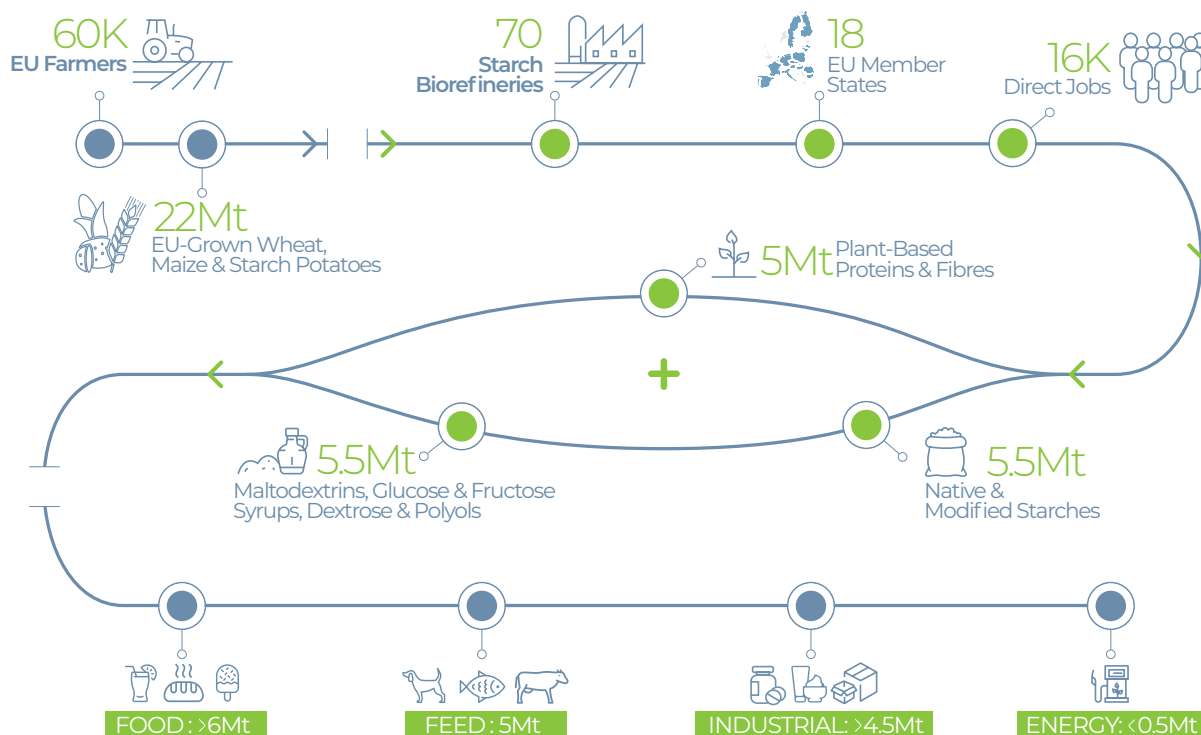


Fig. 1 The Starch Industry Value Chain

This is the moment to modernise Europe's protein framework and recognise the essential role of processors—including starch biorefineries—as central enablers of EU food security.

THE STARCH INDUSTRY'S CONTRIBUTION TO EUROPE'S PROTEIN AMBITION

A PROVEN, SCALABLE, CIRCULAR PROTEIN ENGINE

Processing roughly 22 million tonnes of EU agricultural raw materials each year into over 600 ingredients, the European starch industry inherently produces 5.3 million tonnes of plant-based proteins and fibres, including 1.1 million tonnes of high-protein ingredients, for food and specialised feed markets. This scale already makes starch producers one of Europe's largest and most efficient protein suppliers — since proteins are extracted alongside starch from the same raw materials, maximising the use of existing crops rather than requiring additional land—while strengthening domestic value chains and resilience.

AN EXPANDING PORTFOLIO FOR FOOD

Food applications increasingly rely on plant-based proteins from the starch industry—potato protein, pea protein, wheat gluten, maize protein—for their functionality and nutritional value. Innovation is accelerating across:

- » bakery performance
- » meat and dairy alternatives, including blended options
- » convenient flexitarian products
- » specialised nutrition (clinical, elderly, sports)

Processing is not a weakness but a strength: it enhances safety, digestibility, functionality and nutrient density while maximising resource efficiency. Through innovation in ingredient functionality and formulation, starch-based proteins contribute to healthier and more affordable food options for consumers.

A DEPENDABLE PARTNER FOR EU LIVESTOCK AND FEED SECTORS

The industry simultaneously supplies highly nutritional & functional proteins and fibres essential for European feed markets—from wheat gluten for young animal food through maize gluten meal for poultry and aquaculture, to potato protein for piglets. Critically, food and feed markets are complementary, not competitive, and each strengthens EU resilience.

Furthermore, the use of side streams as a source for feed contributes greatly to the zero-waste nature of our sector and to the circularity and sustainability of the agri-food system more broadly.

FUTURE-READY: ENABLING NEW PROTEIN SOURCES

Starch-based feedstocks (glucose, bran, steep liquor) are foundational inputs for fermentation-based and novel proteins, supporting Europe's diversification and innovation goals. A regulatory system that works for innovation—not against it—will be essential, including in the context of future EU biotech initiatives and Horizon Europe priorities.

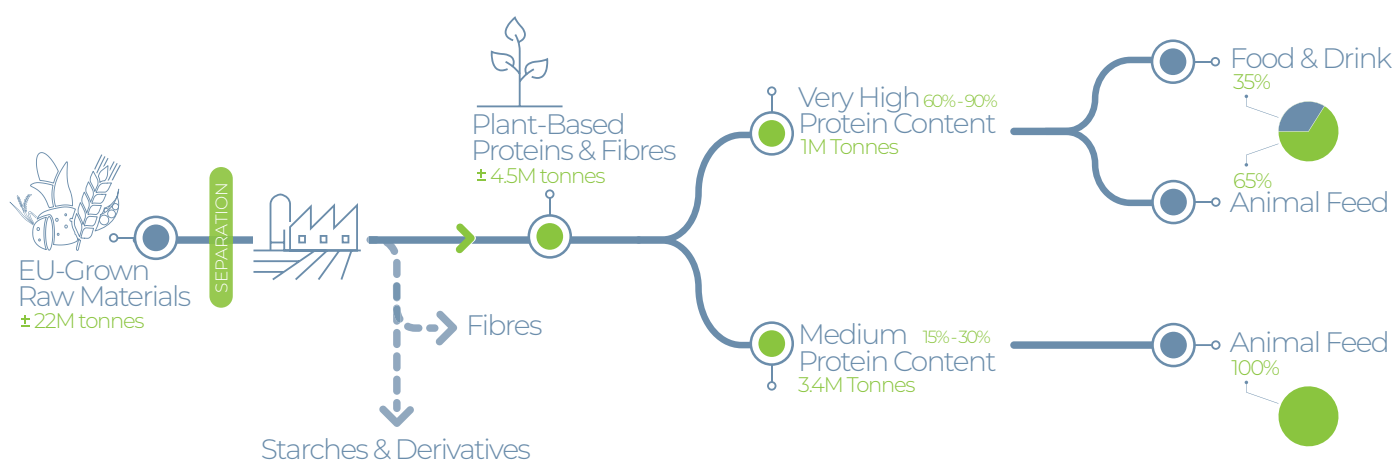


Fig 1 Starch Industry Protein production and outlets (Starch Europe Industry Figures 2024)

STARCH EUROPE'S THREE POLICY ASKS

ASK 1

ADOPT A FULL VALUE-CHAIN APPROACH AND RECOGNISE ALL EU-GROWN PROTEIN SOURCES FOR FOOD AND FEED

Europe must adopt a comprehensive value-chain approach—from farmers to consumers—that integrates supply and demand measures. Demand creation tools such as public procurement, promotion policies and education initiatives are essential to stimulate uptake of EU-grown proteins and plant-based food.

We Ask For:

- Explicit recognition of starch potato- and cereal-derived proteins in EU protein and bioeconomy policy, as well as the inclusion of all plant-protein sources in the 'protein' category of the CMO regulation.
- CAP and CMO measures that enhance the availability, quality, and diversification of EU raw materials.
- Support for crop rotation models that include cereals and pulses that feed starch plants and improve soil health.
- A structured dialogue with the plant protein value chain, in line with the livestock workstream, to

ensure coordinated policy development.

- » Alignment between the EU Protein Strategy and the Bioeconomy Strategy.
- » The establishment of demand-creation tools such as clear promotion and educational initiatives on plant-based proteins

ASK 2

ENABLE INNOVATION AND MARKET ACCESS BY SIMPLIFYING REGULATORY PATHWAYS AND BOOSTING R&I SUPPORT

Innovation in food and feed processing is both an opportunity and a bottleneck, particularly regarding Novel Food approvals and the cost of scaling new ingredients.

We ask for:

- » A simplified, faster, risk-proportionate and harmonised Novel Food process for plant-based and fermentation-derived proteins.
- » Dedicated Horizon Europe / CBE-JU funding for ingredient functionality, nutritional science, and processing optimisation, including for decarbonisation, energy reduction, water use, and emissions in production.
- » A predictable and innovation-friendly biotech framework that strengthens Europe's global competitiveness.

ASK 3

STRENGTHEN EU COMPETITIVENESS BY ENSURING A FAIR AND PREDICTABLE MARKET ENVIRONMENT

EU-produced proteins face pressure from low-cost imports and an evolving regulatory environment for labelling, promotion and trade.

We ask for:

- » Inclusion of protein-rich plant-based foods and plant-based proteins in EU promotion schemes under Regulation 1144/2014.
- » Future-proof Single Market rules, including proportionate and evidence-based approaches to product denominations, ensuring clarity without undermining innovation.
- » Policy coherence that enables affordability and scaling of EU-produced plant proteins.

I CONCLUSION: A READY-TO-SCALE EUROPEAN SUCCESS STORY

The starch industry is already strongly contributing to Europe's protein, bioeconomy and resilience objectives, delivering food security, protein diversification, diversification for farmer income, and can do far more. With the right policy support, Europe can expand its production of nutritional, functional and sustainable plant proteins; reinforce food security and strategic autonomy; support livestock and specialised nutrition sectors; and provide farmers with diversified and competitive market outlets.

Starch Europe stands ready to work with EU institutions and partners across the value chain to make the 2026 EU Protein Strategy a catalyst for Europe's long-term resilience, competitiveness and sustainability.