



## EuropaBio response to the public consultation on the roadmap on Sustainable Food Systems

October 2021

EuropaBio supports the ambition for a sustainable EU and global food system, as enhanced sustainability in the food chain can benefit both people and planet. This initiative, as with all new EU initiatives addressing sustainability, should consider the three pillars of sustainability: economic, environmental, and social.

Rather than commenting in detail on the policy options that will be part of the impact assessment at this stage, we would like to comment on some more specific items included within the roadmap:

In terms of the sustainability assessment of products to be placed on the market, we consider that all products should be assessed equally. Assessment of products to be placed on the market should remain science- and risk-based, with any new sustainability requirements ideally falling into existing informational requirements for approval and assessment to avoid increasing the administrative burden on food chain actors.

The roadmap also outlines the possibility of developing sustainability labelling for consumer information and to support market pull for sustainable products. We note that any labelling developed for the purpose of informing consumers regarding sustainability criteria should be informative and standardized, similar to current labelling norms around allergen presence and nutritional information. This would also enhance transparency for the consumer by preventing (or reducing) the use of sustainability terms used as subjective marketing terms. Labelling should be meaningful and truthful.

The bioeconomy sectors have important roles to play in contributing towards sustainable food systems, improving industrial efficiencies and reducing food waste. As part of this, we consider that sustainability in food systems should focus on the entire sustainability footprint of a product and needs to be supported by the best available solutions, and not on the process used to make them. While there are no silver bullets, all technologies including both established and cutting-edge techniques like new genomic techniques should be considered as part of the toolbox available to food chain actors. In this regard we welcome the Commission's intention to pursue a legislative initiative for plants developed using new genomic techniques but at the same time we encourage the Commission to broaden the scope of its actions to also include microorganisms.

Finally, we would like to emphasize that biorefineries are key as they valorise every component of renewable feedstock to produce a wide range of products and

ingredients for food and feed, amongst other sectors. They significantly contribute to the principles of a circular bioeconomy and move towards a 'zero waste' society.

**Please see also:**

[Industrial Biotechnology Solutions for Sustainable Agriculture – EuropaBio report](#)

[Industrial biotechnology – Helping End Hunger Sustainably – EuropaBio case study on UN SDG 2](#)

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