

Contribution to public consultation on the Roadmap on “Farm to Fork strategy”

EU Specialty Food Ingredients represents directly and indirectly around 200 European manufacturers of specialty food ingredients. Specialty food ingredients are combined with staple ingredients in order to typically preserve, texture, emulsify, colour, help processing and add an extra health dimension to produced food. They are all key to guarantee the wide range of processed foods as offered today to the consumer. They range from micro-ingredients like vitamins, minerals and enzymes to macro-ingredients like specific proteins, functional carbohydrates, fats, fibres and other substances. With their technological, nutritional and health related functions, they make the food tasty, pleasant to eat, safe, sustainable, health and affordable.

Specialty food ingredients:

- Contribute to the safety and convenience of foods
- Bring a technical and market response to public health needs
- **Are one of the key options for sustainable food processing.**

Actually, specialty food ingredients:

- improve resource efficiency by continuously innovation and by using all valuable components of raw materials;
- help make processing of foods more efficient, thus limiting the quantity of raw materials required for production and resulting in energy saving, thus reduction of Greenhouse gas;
- contribute to waste reduction.

Furthermore, technology advancements reduce the environmental impact of the specialty food ingredient production.

To know more about the role of specialty food ingredients as “**sustainability enablers**”, please consult our fact sheet available [here](#).

Being a frontrunner on addressing the challenges and opportunities of a sustainable food chain for many years, **EU Specialty Food Ingredients welcome the launch of the new Farm to Fork strategy within the global frame of the Green Deal and the UN Sustainable Development Goals.**

As regards what the Farm to Fork initiative aims to achieve and how, **we particularly welcome the intended stimulation of research, innovation and financial investments to provide solutions for sustainable food systems and market opportunities:** actually, with an average of 5 % (up to 8 %) of their annual turn-over invested in R&D, our member companies are at the cutting edge of innovation in the food chain. Providing sustainability enabling solutions is not new to them, and they are constantly looking at improving the efficiency of these solutions.

Yet a crucial aspect to facilitate the shift to sustainable food consumption and reduction of food loss and waste lies on the acceptance by consumers of these sustainability enabling solutions.

Whilst a lot of attention is paid to acceptance by consumers/civil society of novel technologies (e.g. biotechnologies, nanotechnologies etc.), which is for example addressed in the upcoming Scientific Opinion on the topic of “Towards an EU Sustainable Food System: Insights from Social Sciences”, acceptance of existing solutions and of their potential future improved derivatives is not addressed at all.

We believe that **the intended stimulation of research and innovation should clearly encompass a communication dimension towards the consumers/civil society, which provides a clear and unambiguous support from the legislator to these safe sustainability enablers, many of which are food improvement agents, processing aids and other types of ingredients.**

Failure to do so puts the food chain at the risk of being deprived from useful technological and functional tools to support the transition towards more sustainable food systems in relation to – for example and non-exhaustively - nutrition and food reformulation, food waste reduction, novel ingredients.

Finally, whilst we can agree that no impact assessment is carried out ahead of the adoption of the strategy roadmap in the light of its general scope, we insist very much on the **need for economic impact assessments (EIA) for the regulatory initiatives that may result from the future action plan.** For such specific initiatives, EIA cannot be substituted by general consultations such as the ones put in place ahead of the adoption of the strategy roadmap.

We thank you for the opportunity to comment. Our sector remains committed to help the journey towards more sustainable food systems. We look forward to a fruitful cooperation to achieve this goal.

EU Specialty Food Ingredients is the trusted and preferred source for credible information on the many health and functional benefits of specialty food ingredients for manufacturers, retailers, regulatory authorities and consumers, working with trusted experts and a science-based approach.

EU Specialty Food Ingredients' identification number in the Transparency Register: 6160532422-38.

For more information, please contact:

EU Specialty Food Ingredients – Tel. +32 (0)2 736 53 54 – Email: info@specialtyfoodingredients.eu – Website: www.specialtyfoodingredients.eu