

Fedima Manifesto

FOR THE 2024-2029 EU POLICY CYCLE

Fedima is the federation of **European manufacturers and suppliers of ingredients to the bakery, confectionery, and patisserie industries**.

We represent the interests of almost **27,000 direct employees** across Europe. Fedima's membership comprises national associations in **13 European countries** and represents **200 companies** across Europe, generating an **annual turnover of 7 billion euros**.

The food and drink industry is a cornerstone of Europe's economic landscape and cultural identity. Bread and pastries are a staple of European diets and culinary traditions.

As a European association of B2B food ingredients producers, **Fedima defends the importance of a strong and harmonised internal market and regulatory frameworks that provide certainty and nurture innovation and sustainable growth across the European Union**.

To support Europe's bakery, confectionery and patisserie sector and the entire bread and pastry value chain, Fedima puts forward the following **recommendations to EU policymakers, for the benefit of European citizens, the environment and our economies during the 2024-2029 mandate**.

1 A positive regulatory framework for innovation and growth

Innovation is vital for our industry, not only to **meet the evolving dietary needs and expectations of European consumers**, but also as a key tool for **achieving sustainable and resilient food systems**. However, existing regulations often pose unnecessary obstacles to innovation, stifling the development of new products and processes that could enhance the nutritional quality of bakery, confectionery, and patisserie products. We hope that initiatives such as the upcoming Biotechnology Act from the European Commission will address these challenges and support the industry's ability to innovate effectively and competitively.

Representing food ingredients producers, we believe that **removing regulatory bottlenecks will ensure that safe, innovative and sustainable processes, technologies and products can be introduced onto the food market in a timelier manner**.



We call for a food regulatory approach that supports innovation and sustainable economic growth in the food industry, while protecting intellectual property and securing EU competitiveness.

A flexible and adaptive framework to the specific needs of our sector will enable us to continue our vital role in contributing to the European Union's nutritional goals and ambitions.

2 Recognising the essential role of bread and pastry in European diets and traditions



We urge policymakers to acknowledge the vital nutritional and emotional role that bread and pastry products play in the daily lives and diets of Europeans.

Facilitating a regulatory framework that encourages product enhancement is crucial to meet evolving consumer needs and preferences.

A balanced diet is the foundation of good health, and **baked goods like bread and pastries play a crucial role in maintaining a healthy and balanced lifestyle and eating habits among European citizens**. Bread has been a staple in European diets and **culinary traditions** for centuries, and it continues to play a critical role in providing **essential nutrients** to millions of people across the continent. Pastry consumption also satisfies a variety of **emotional and functional needs**, with pastry products being associated with emotions such as joy, indulgence, energy and connection with others among European consumers.

Despite this importance, the contribution of bread and other baked goods to the lifestyle of Europeans is often underestimated. Our commitment to continuously improving the quality of bakery, confectionery, and patisserie products is unwavering, and **we are dedicated to playing our part in making Europeans healthier and happier**. This means not only **improving the nutritional composition of our products**, but also ensuring that our industry has the freedom to **innovate and respond to changing consumer needs and preferences**, for example by developing breads with reduced salt content and pastries with lower sugar levels.

Recognising the unique characteristics of the B2B sector 3

The business-to-business (B2B) sector operates under specific conditions that are often not fully accounted for in legislation, while it is still frequently impacted by regulations designed for the business-to-consumer (B2C) sector. **When legislation is created having the B2C sector in mind, B2B suppliers are often indirectly affected due to the additional demands placed on us by our customers**.

In some cases, **regulatory frameworks lack clear guidance on how they apply to the B2B sector**, creating uncertainty and inconsistency in compliance. In other cases, B2B suppliers risk being held responsible for product decisions made further down the chain beyond their control.

Recognising the unique characteristics of the B2B sector includes **distinguishing between B2B and B2C responsibilities**, particularly in areas such as labelling, contaminants, and product formulation, to ensure that accountability is fairly distributed throughout the supply chain. By addressing these issues, we can ensure **greater legal certainty and smoother collaboration across the industry**.



We call on policymakers to provide clear guidance on how policies created for B2C sectors apply to the B2B sector, which operates under different and unique circumstance. This will ensure greater legal certainty and smoother collaboration across the supply chain.

For example, labelling legislation intended for consumer-facing products can lead to unnecessary complexity in the B2B supply chain, as we face requests for compliance from B2C producers that do not reflect the practical realities of our operations. We believe that **digital labelling solutions**, which provide more flexibility and detailed information, should be embraced to help alleviate these challenges.

Commitment to science-based regulations 4



We call on policymakers to ensure that science is at the heart of any regulatory framework affecting the food industry.

Fedima supports regulations that are grounded in robust scientific evidence and that reflect the **latest research in health, nutrition and food safety**, building on sound methodologies that provide reliable results. Bakery ingredients manufacturers are committed to working with policymakers, scientists, and other stakeholders to develop regulations that **promote and enhance the quality and safety of the products we supply**.

Our industry needs more predictable, science-based regulation to build confidence for future investments.

5 Harmonisation and legal certainty for a functioning internal market for the food industry

A harmonised regulatory framework is essential for ensuring the legal certainty and smooth functioning of the internal market for the European food industry. The lack of harmonisation has detrimental effects on both consumers and businesses. **Inconsistent regulations across member states create confusion, undermine consumer trust, and increase costs for businesses that operate across borders**.

For example, the proliferation of voluntary Precautionary Allergen Labelling (PAL) and diverging authorities' approaches in the absence of harmonisation at EU level, together with its appearance on unexpected products, have restricted food choices for allergic consumers. This has led to a loss of credibility and reduced observance, with consumers then taking increasing risks in their consumption habits.



We call for regulatory harmonisation across EU members states in order to address current disparities that undermine the smooth functioning of the internal market for food.

Consumers deserve to receive clear and consistent information, regardless of where in they purchase their products.

Promoting sustainability through clear and harmonised legislation 6



We call on policymakers to facilitate harmonised sustainability regulations across all EU member states, ensuring a level playing field conducive to a competitive industry able to keep growing responsibly.

With sustainability at the core of its mission, Fedima is committed to making both the European food industry and the diets of Europeans more sustainable. Sustainable practices are integral to our future, and we believe that with the right regulatory framework, our industry can lead the way in reducing environmental impacts and **promoting healthier and more sustainable food choices**.

Legislation should encourage and incentivise these efforts rather than hinder them, allowing our sector to thrive while contributing to the EU's sustainability goals. To achieve this, **legislation on sustainability must be clear and innovation-driven, without placing excessive burdens on companies**.

7 Acknowledging the impact of climate change on raw materials availability and food safety

Climate change poses a significant threat to the availability and quality of raw materials essential to the bakery, confectionery, and patisserie industries. Changes in weather patterns, increased frequency of extreme events, and rising temperatures will affect agricultural yields, leading to shortages of key ingredients and fluctuations in quality. All such **hazards and risks introduced by climate change will compromise food safety and lead to food insecurity**.

Developing legislation that ensures the long-term availability of safe, high-quality raw materials will be crucial to ensure food security for future generations of Europeans.

Fostering **innovation in sustainable agricultural practices**, promoting **research into climate-resilient crops**, and supporting **supply chain diversification** will help mitigate the effects of climate change on our industry while maintaining food safety and quality standards.



We urge policymakers to take a proactive approach to addressing food security risks through climate adaptation strategies in agriculture and along the entire food supply chain.

Fedima calls on EU policymakers to foster a regulatory environment that promotes **innovation, growth, and sustainability** across Europe's bakery, confectionery, and patisserie industries.

By recognising the **essential role of bread and pastries** in a balanced diet, **supporting science-based regulations**, addressing the **unique needs of the B2B sector**, prioritising **climate adaptation strategies**, and ensuring **harmonised legal frameworks** for a functioning internal market for food, we can continue enhance the quality, safety, and sustainability of our products.

Clear, consistent, and supportive legislation will enable our industry to innovate, meet evolving consumer expectations, and contribute to a more sustainable European food system.

With this framework, Fedima reaffirms its commitment to contributing to the health and well-being of Europeans, strengthening the internal market, and pushing for a vibrant and sustainable future for the European food industry.

Federation of European Manufacturers and Suppliers of Ingredients to the Bakery, Confectionery and Patisserie Industries

www.fedima.org

secretariat@fedima.org
Rue de la Loi 38, 1000 Brussels, Belgium
EU Transparency Register: 904362515084-73

fedima