

REPLY TO THE CONSULTATION ON THE FARM TO FORK STRATEGY

ACE supports an ambitious EU Farm to Fork Strategy aimed at achieving sustainable food systems. As the latter contribute to about 25%-30% of the EU greenhouse gas emission, the Farm to Fork strategy is an essential tool to enable the EU transition to a climate neutral economy.

Renewable food packaging materials, such as beverage cartons, have an important role to play in both reducing greenhouse gas emission and in achieving a circular economy. Circularity starts with the use of renewable materials made from sustainably-sourced biomass that replenishes and regrows over time. By enabling the replacement of finite fossil-based sources, such materials secure raw material supply for the long term. At the same time, they contribute to climate neutrality by acting as carbon sinks and replacing carbon-intensive fossil-based materials in certain applications.

To scale up the contribution of food systems to the climate and environmental ambitions outlined in the Green Deal, ACE supports a future Farm to Fork Strategy that:

- Recognises the **role of packaging** in protecting food all along the value-chain: it contributes to **minimise food waste** and spoilage, while protecting **consumers health**. **Functionally relevant packaging solutions** are an essential tool to achieve the Green Deal objectives to reduce over packaging, minimize food waste and facilitate portion control for a healthier and sustainable diet.
- Secures **sustainable practices in food distribution**, allowing logistic efficiencies, better information sharing between food supply chain players to detect deficiencies and an improved traceability system to identify losses and waste.
- Incentivises **the use of sustainable packaging**: in the same way as recycling, the use of low-carbon circular materials should be embedded in the Essential Requirements of the Packaging and Packaging Waste Directive. The use of low carbon packaging materials, such as **sustainably-sourced renewable materials**, contributes to climate neutrality, preserves biodiversity and has positive social impacts. Both the [EU Bioeconomy Strategy](#) and the [EU 2050 long-term Strategy](#) acknowledge that sustainable renewable raw materials are key to achieve climate neutrality. In addition, a recent [report](#) stresses that the substitution of carbon intensive fossil-based materials with low carbon materials produced from Swedish forest lead to a saving of around 42MtCO₂, which represents more than the total CO₂ emissions of a country like Denmark.
- Ensures that all food packaging raw materials are **sustainably sourced**, based on legally binding provisions on due diligence and globally recognised certification standards.
- Supports **further harmonisation of rules on food contact materials**, including specific measures for those materials that are not covered yet, such as paper and board. This will: ensure that the same rules apply all over Europe; strengthen the internal market; improve the competitiveness of the European industry that will have to comply with a unified legal framework, instead of a patchwork of national legislations.