

## SAFE Safe Food Advocacy Europe



Several activities described in the present report were financially supported by the LIFE programme of the European Commission under the Agreement No. LIFE19 NGO/FPA/BE000033. Contents and opinions expressed in this document do not reflect the official opinion of the European Union and are the sole responsibility of Safe Food Advocacy Europe and its partners.

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## The main take-aways of the year from our Secretary General

It is a privilege for me to present to you the Annual Report of the activities ran by SAFE in 2021.

First and foremost, we would like to thank the European Commission (EC) for the financial support bestowed to SAFE through the Life Operating Grants and the several projects SAFE is coordinator or partner of.

It has been a very important year for us, as we were awarded **EU Climate Pact Ambassadors**, as SAFE has worked towards the promotion of sounder consumption habits through concrete initiatives and projects aiming at decreasing the environmental footprint of the food sector. We believe it is important to keep on reaching out to people and/or organisations who are not yet involved in climate action, to inform, inspire and create a bigger international community committed to reach climate justice and sustainable food environment, and to become a bridge between civil society, interested stakeholders and the European Commission.

During the last year, we have been working for the protection and representation of EU consumers in the food sector to ensure that their health and their concerns would have remained at the core of the EU's food legislation. In the following pages you will read about all the actions we have undertaken in 2021 to strengthen the voice of civil society in the EU debate over food regulation, thereby reinforcing participatory democracy in the EU.

Our biggest achievement was **the ban of E171** as an additive in EU food and we cannot be happier for this result, since it is our priority to advocate for **safer food standards, sounder food production methods and more fit-for-purpose food donation rules**, while **increasing public awareness** of food safety issues. For these reasons, we have been organising trainings, we have run campaigns to raise awareness and to allow citizens to make informed choices, guided by the silver thread running through our activities and linking food and environment to human health, while promoting sustainable consumption habits and agricultural practices.

I would like to stress the effort undertaken by SAFE to ensure safer food standards for consumers by monitoring the EU food legislation process and cooperating with EU stakeholders to draft comprehensive food regulations. SAFE has continued supporting the development of policies and awareness-raising actions which jointly address **health, environment, food safety and sustainability**, all-the-while being involved in several EU-funded projects aimed at reducing the environmental impact of the food sector, increasing sustainability, and promoting healthier food environments for consumers. For next year, I am thrilled to share with you that we will add **inclusion** to our main goals, since poverty has increased because of the Covid-19 pandemic.

To conclude, I would like to thank once again and never enough our members, for unconditionally supporting SAFE and working together, always reminding each other that there could be no equity in our systems, if the tools given to citizens are different.

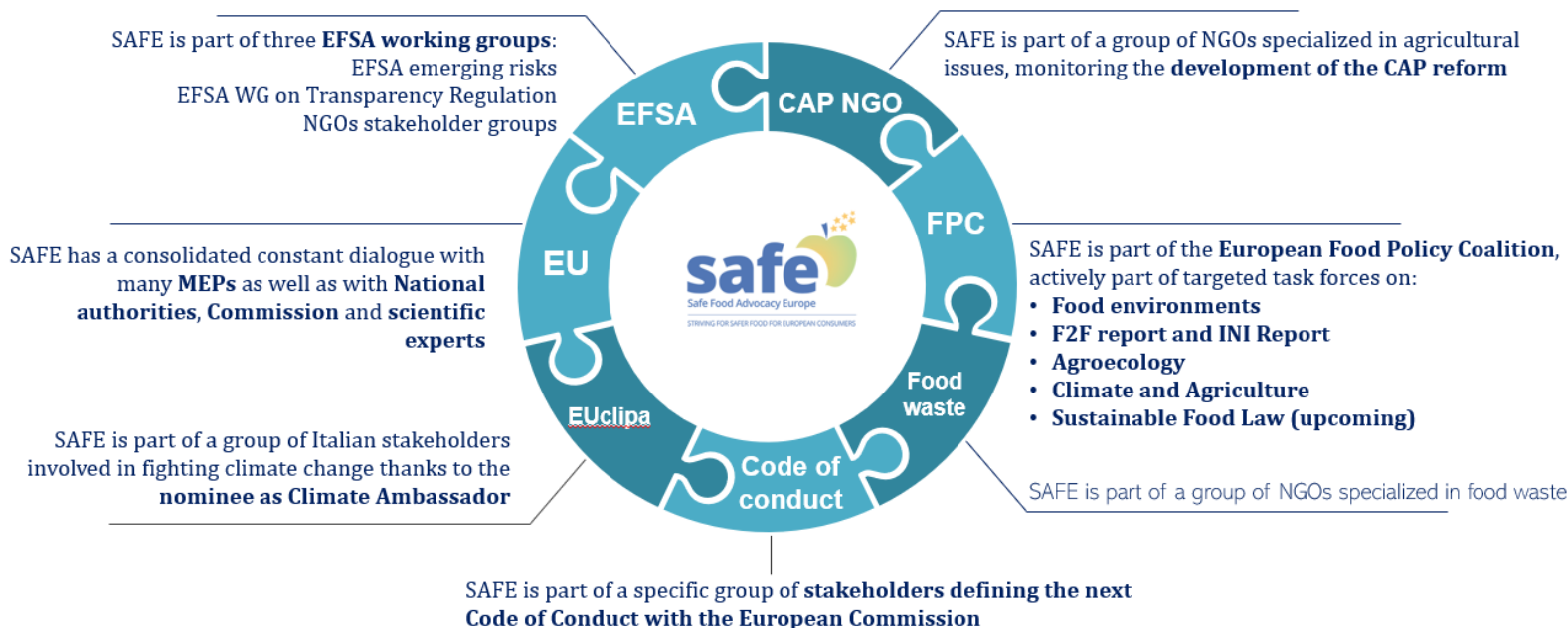
Floriana Cimmarusti,

*Secretary General, SAFE - Safe Food Advocacy Europe*

## SAFE members

SAFE Members are spread over 15 European countries (Belgium, France, Italy, Germany, the United Kingdom, Ireland, Greece, Bulgaria, Romania, Cyprus, Poland, Luxembourg, the Netherlands, Croatia, Lithuania) and they collectively represent over 17,000,000 European citizens. They are national consumer organisations, health organizations, obesity associations, organisations fighting against food waste and food poverty, universities and independent researchers, doctors, nutritionists, sustainable agriculture organisations. In the past year, SAFE obtained 6 new members, who are consumer organisations, organisations working in the fields of Food Waste management and Sustainable Agriculture, and universities. The new members are the **Center for Consumer Education and Information** (CEIP, Croatia), the **Union of Working Consumers of Greece** (EEKE, Greece), **Happy Hours Market** (Belgium), the **Lithuanian Consumer Institute** (LCI, Lithuania), the **Université de Liège – Gembloux AgroBioTech** through its Laboratory of Phytopathology (Belgium), and the **Ver. Netwerk ter bevordering van Biocyclische-Veganlandbouw in Nederland en Vlaanderen** (The Netherlands). Furthermore, the **Vegan Society Luxembourg** (Luxembourg), one of SAFE's previous members, decided to join our network once again.





## SAFE network

Over the last years, SAFE built a considerable network engaging with all different types of stakeholders.

Additionally, to all the advocacy activities, SAFE continued building capacity and strategies within existing external groups such as:

- The **EU Food Policy Coalition (FPC)** – SAFE attended several meetings to present the vision, mission and objectives of the FPC used to enable policy integration and to achieve alignment at EU-level of all policies to facilitate the transition to fully sustainable food systems. In addition, SAFE coordinated with the NGOs part of the coalition to comment on the amendments proposed for the INI Report of the EP on the Farm to Fork strategy organised by the FPC.
- The **Horizon Europe Matchmaking Platform**. Thanks to the work performed in this working area, SAFE broadened its network participating in networking events connecting with stakeholders operating to create sustainable food packaging, and to create more sustainable and safer FCMs for both consumers and the environment. The event was organised by ERRIN together with The Research Council of Norway, and the Norwegian EU networks FINN-EU, Horizon Sustainable Oslo Region and Horizon Mid-Norway.

## 1. Key working areas of 2021

Thanks to the LIFE funds that SAFE was granted with, during 2021 we were able to carry out activities linked to three areas of interest: food waste, food packaging, and sustainable agriculture.



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### 1.1. Food Waste

#### Advocacy

Food waste constitutes a dire environmental issue, being also accountable for 8% of all global greenhouse gas emissions caused by humans. It is estimated that around 88 million tons of food are thrown away each year in Europe. These figures add to the colossal amounts of food lost and wasted along the supply chain (e.g. during the harvesting and production stages).

In 2021, SAFE developed its already existing work on food waste, which resonate with specific EU and international policies or initiatives: the European Green Deal, the EU Climate Law, the EU Climate Pact, the Farm to Fork Strategy, the Biodiversity Strategy, the new Circular Economy Action Plan, the Directive 2008/98/EC on Waste, the Regulation (EC) No 1935/2004 on Food contact materials, the Paris Agreement on climate Change (COP21), the Sustainable Development Goals of the UN, the Communications 'Towards a Circular Economy: a zero waste programme for Europe', 'Roadmap to a resource efficient Europe', 'A roadmap for moving to a competitive low carbon economy in 2050', etc.

By speaking in EFSA events on food waste, drafting responses to consultations, reports and joint position that have been systemically and collectively shared online (i.e., when working alongside the Food Policy Coalition), SAFE managed to increase the food waste regulation package effectiveness. We believe our actions have contributed to the debate on food waste regulation packages, suggesting clear policy paths by repeatedly calling for strong binding reduction targets of 50% for both food waste and loss by 2030 across the entire food chain and demanding a more fit-for-purpose date marking EU framework in the context of the revised Food Information to Consumer Regulation (estimated release date: 2023).

SAFE participated in EU working groups, parliamentary session, meetings with Commission officials and panels of experts, notably advocating for binding targets within the framework of the revision of the Directive 2008/98/EC on waste and its amending directive 2018/851, the Circular Economy Action and the Farm to Fork Strategy. SAFE also responded to [public consultation](#) (e.g., public consultation on Sustainable Food Systems in October 2021) and participated in joint position papers ("10 priorities for the Farm to Fork INI report") to help incentivize stakeholders towards more ambitious goals, i.e. mandatory targets within the framework of the Farm to Fork Strategy. Both these elements tackled the framework envisaged by directive 2018/851 and helped pave the way for a political environment that helped fostered these voluntary targets.



Furthermore, SAFE also participated in an EU Waste Coalition meeting on April 13<sup>th</sup>, 2021, which tackled the EC Revision of the Food Waste Directive. Throughout the year, and more intensively in November and December 2021, SAFE was in constant contact with its members and prospective members with the idea of involving them in future advocacy activities, notably its working group on food waste. Fruitful, in-depth preparatory calls as well as the handing out of questionnaires has allowed SAFE to better assess members' willingness to be involved as well as their capacity of action. Among new members who joined SAFE in 2021, 2 showed their interest to be involved in SAFE's food waste activities.

## Campaigns

Reducing food waste and increasing food redistribution activities are the main priorities of the European Green Deal and Farm to Fork policies. Through its work and network within the Food Policy Coalition, SAFE has successfully contributed to the debate by collaborating in impactful joint position papers such as the "10 priorities for the Farm to Fork INI report". This document successfully encouraged the European Parliament to endorse the Farm to Fork binding targets relating to food waste ("the reduction target must be made binding and apply through the entire supply chain, including the primary production and retail levels"). Our response to the public consultation on Sustainable Food Systems in October 2021 also called for strong binding reduction targets of 50% for both food waste and loss by 2030 across the entire food chain, while our January 2021 contribution to the Road map on Food labelling tackled the issue of date marking and its link to domestic food waste.



In December 2021, SAFE has teamed up with [Happy Hours Market](#), a Belgian start-up that fights food waste by offering consumers unsold food from supermarkets at a reduced price. The remaining food is then redistributed to charities to further halt food waste and help out those in needs. Happy Hours Market currently delivers to 8 charities located across Namur and Brussels, with food deliveries benefiting disadvantaged groups of pensioners, children or college students. The goal of this partnership is to better combat food waste while maximising the social impact

of the campaign. This will be through an active follow-up of Happy Hour Market's deliveries with organisations, while striving to expand the charity network through a joint communication strategy.

Due to the covid-19 crisis and the several hotels across the Brussels region closing down, SAFE went back to its last campaign “[One Man’s Waste is Another Man’s Treasure](#)” financed under our previous LIFE operating grant in order to focus on food surplus originating from the retail sector. Within these settings, SAFE has successfully managed to conduct 46 deliveries to various charities across Brussels. What’s more, to sustain this action in the long term, SAFE will continue to work towards a more accessible food redistribution framework under the ESF+ operating grant (2022-2024).



### **Future actions**



To conclude, it is important to highlight a very important achievement for us: in 2021, SAFE became a consortium partner of 2 approved Horizon 2020 projects. The first one, [SISTERS](#) (abbreviation of “Systemic Innovations for a SusTainable reduction of the EuRopean food wastage”), started in 2021 and will finish in 2024. The project aims to reduce food loss and food waste in the main different stages of the Food Value Chain in Europe through innovations targeted to each link of the value chain. SAFE is involved in different activities but is the leader in charge of the coordination with the EC services and the establishment of links with other relevant European & National programmes.

The second project, [ZeroW](#), aims to demonstrate the applicability of systemic innovations in addressing the current food system’s Food Losses and Waste lock-in effects and steer a just transition towards a near-zero FLW system. This systemic innovation approach is based on the development of a core demonstrative environment supporting nine Systemic Innovation Living Labs (SILLS) along the value chain, complemented by assessment activities to ensure a long-term environmental and economic sustainability of zero-FLW solutions and a just transition towards a near-zero FLW system.

These two projects will allow SAFE to further engage in research and advocacy actions relating to food waste alleviation long after its actions under Life are finished, thereby ensuring sustainability of action. This partnership will undeniably contribute to the identification of new issue or solution related to food waste.

## **1.2. Food Packaging and Food Contact Materials**

### **Advocacy**

SAFE conducted both advocacy and raising-awareness activities within the food packaging policy area. In the frame of its advocacy strategy, SAFE participated in EU working groups, parliamentary sessions, meetings with Commission officials and panels of experts to convincing EU policymakers to reduce food packaging by promoting the use of solutions such as safe reusable containers and bulk retail sales. To support this work, SAFE developed policy papers and reports as evidence material useful for the public consultation launched by the Commission, calling for more sustainable and toxic-free food packaging options.

Specifically, SAFE developed [contributions](#) to public consultation on recycled plastics and Food Contact Materials (FCMs) and research papers investigating food packaging waste increase due to



the Covid-19 outbreak. SAFE published its report on recycled plastics in FCMs at the end of 2020 and advocated for higher safety standards within the revision of the FCM Regulation during the whole 2021, proving scientific data on the substances of concerns whose restriction procedure should be revised.

In January 2021 SAFE [responded](#) to the Road map “Revision of EU rules on food contact materials”, to invite the Commission to give greater attention to the presence of NIAS in the recycled plastic in FCMs, specifically considering the Circular Economy objectives. As these substances are harmful for consumers, there should be a strong regulation assessing the healthiness issues. In that sense, we endorse the need of an independent scientific research on this matter.

## Campaigns

As regards the raising awareness campaigns, SAFE developed [guidelines for safe use of FCMs for consumers](#) and circulated the document among its members and other consumers organisations. In addition, SAFE increased its collaboration with other NGOs, cooperating with the Food Policy Coalition for the realisation of a policy brief on food environments and supporting in its dissemination through main EU media channels and social media. SAFE delivered a report on “Covid pandemic and consumers trends leading to an increase in plastic waste”. We decided to create this report investigating the effects of Covid-19 on plastic waste trends, showing how the pandemic increased delivering food services with consequent effects on plastic food packaging consumption. The research was also presented at the EFSA Emerging Risks meeting in March 2021.



Thanks to the Life grants on FP, SAFE helped increase awareness of the small food businesses regarding FP. As a matter of fact, we decided to raise awareness among consumers instead of food businesses regarding food packaging showing best practices for using FCMs properly in order to reduce their exposure to hazardous substances. SAFE contacted and shared the guidelines with all its members and with other consumers organisations. By sharing best practices with consumers and raise awareness on the environmental risks connected with excessive packaging, SAFE helped the reduction of FP, also showing the rising numbers of FP items following the Covid-19 pandemic and the increased numbers of delivering services.

## The “Consumers Come First” Conference

The annual conference, named “[Consumers Come First](#)”, was organised to analyse the important challenges hampering proper food information to consumers, trying to understand how to shift towards a more sustainable food system. The conference aimed to identifying trends capable of fostering better food environments for consumers and ultimately facilitating the shift towards a more sustainable food system and it was advertised through SAFE’s main challenges and website.

The organisation of this event was taken on by SAFE, and divided in three panels, each one addressing a core policy area of SAFE. The participants addressed the main challenges linked to the revision of the FCM Regulation, highlighting the main regulatory and safety shortcomings.

Furthermore, thanks to the conference organised on the 10<sup>th</sup> of November, SAFE gathered 171 attendees and the participation of [Commissioner Kyriakides](#) that addressed the main issues connected with the FCMs revision.



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### 1.3. Sustainable Agriculture

#### Advocacy

SAFE had identified a set of overall objectives that have been delivered during 2021, as SAFE's constant advocacy and awareness-raising activities have contributed to an increased knowledge and awareness of consumption and production patterns and the impact that such ways have on the environment and climate. Similarly, these activities have contributed to the growth of SAFE's capacity and network, thanks to the strengthening of its positions and expertise and its growing exposure at EU level.

In 2021, SAFE published a [policy brief](#) (*"A 10+13 agroecology approach to shape policies and transform EU food systems"*), as a part of the FPC Taskforce. This policy paper - co-signed by 25 NGOs - puts forward a proposal to mainstream agroecology into policies governing EU food systems. This paper builds on the consensual vision to use the FAO "10 Elements of Agroecology" and "13 Agroecological Principles" as a framework to develop the appropriate instruments and targets for EU policies. Agroecology, *'the science of applying ecological concepts and principles to the design and management of sustainable agriculture and food systems'*, has been identified by a series of landmark international reports as a key enabler for food systems transformation. This brief was meant to describe a common understanding of the pathways towards sustainability, using agroecology as the central notion to build sustainable food systems.

In February 2021, SAFE and 20 NGOs sent a [joint letter](#) to the Portuguese Presidency of the Council of the EU concerning restrictions on the labelling of plant-based food in the reform of the Common Agricultural Policy, and the need to oppose the EP's Amendments 171 and 72 regarding the denomination of plant-based products.

In March 2021, SAFE co-signed (with 33 European NGOs and 8 national civil society organisations) a [joint letter](#) to EC Executive Vice-President Timmermans, Commissioner Wojciechowski, Minister do Céu Antunes, and MEP rapporteurs concerning the CAP regulations calling for ambition in dialogues for a green and fair reform of the CAP. The letter urged the lead negotiators to integrate five overarching priorities into the three CAP regulations, including aligning the objectives and targets of the CAP with the Green Deal to give the CAP Strategic Plans a clear direction.

In April 2021, SAFE co-signed a [joint letter](#) with 14 NGOs to EC Executive Vice-President Timmermans and Dombrovskis, Vice-President Jourova, and Commissioners Kyriakides and Wojciechowski to support the 'End the Cage Age' European Citizens' Initiative supported by 1.4

million verified signatories. The letter asks to phase out the use of cages in farming by revising EU Directive 98/58/EC on the protection of animals kept for farming purposes.

In April 2021, SAFE also co-signed a [policy paper](#) put together by 24 NGOs ahead of the preparation of the European Parliament own initiative report on the EU Farm to Fork Strategy. This policy brief lists 10 key priorities for action and calls on MEPs to endorse them.

In October 2021, SAFE co-signed a [joint statement](#), signed by 27 NGOs, during the stakeholders' discussions around the implementation of the Farm to Fork Strategy. The statement calls on MEPs to support an ambitious Farm to Fork Strategy, setting the course for the transition towards sustainable food systems with ambitious targets to cut back on agro-chemical inputs and antimicrobials and to move towards more organic farming.

## Campaigns

On this issue, SAFE was able to increase the knowledge and use of the stock-free organic farming techniques, by continuously producing communication/informative material, and participating in relevant policy events and meetings, to push forward the knowledge and visibility of stock-free organic farming techniques at EU level. Within this context, SAFE contributed to the implementation of concrete farming measures, promoting stock-free organic labelling systems, certification schemes and alternative business pathways. We engaged in collective actions with other NGOs (through the CAPNGO and EU FPC groups) to build and sustain a strong narrative aiming at strengthening the sustainability dimension of the agricultural policies in the EU.

The end results of these actions are to be seen in the coming months, as the Covid pandemic and external events (such as international tensions) have delayed some conversations or reduced capacity, but strong declarations have been made by EC Vice-President Timmermans and other Commissioners in the framework of public conferences (Farm to Fork Conference, AgriOutlook conference, etc.), providing forward-looking views to foster sustainable agri-food systems, aiming to improving the general legislative framework.

## The Grow Green Conference



On the 1<sup>st</sup> and 2<sup>nd</sup> of June 2021, following up on a similar initiative launched in the United Kingdom by SAFE's member The Vegan Society in 2019, SAFE organised the "[Grow Green](#)" conference, on the topics of Sustainable Agriculture, Plant-based Organic Farming and Food. The management of this event was taken on by SAFE, with the special support of the Vegan Society (UK) and the expert support of a group of SAFE's members - Végétik (BE), the Vegan Organic Network (UK), the Förderkreis Biozyklisch-Veganer Anbau (DE), VeganOK (IT), Vegan France (FR), SONVE (IT), BNS Biocyclic Network Services (HE/CY) - taking part in the Working Group on Sustainable Agriculture and Stock-Free Organic Farming, which met several times in the course of 2021 to follow-up on 2020 discussions around the conference, including in two formal meetings in February 2021.

The conference successfully increased the awareness of policymakers about the impact of animal agriculture and the benefits of moving towards plant-based organic farming, through several

dedicated sessions and panel discussions. Moreover, it promoted plant-based organic agriculture as one of the solutions to combat the climate crisis. Participants and speakers discussed and gathered support for policies favouring this type of agriculture, especially with regards to the Organic Action Plan launched by the EC in April 2021 and in the framework of the discussions around the revision of the CAP happening in the course of 2021.

Thanks to the [conference](#), plant-based and organic farming pioneers shared their knowledge and demonstrated that their methods and techniques are economically viable for farmers. This showed the opportunities that plant-based organic offers to food manufacturers and retailers.



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### **RegAgri4Europe Project**



**Erasmus+**

From 2021 onwards, SAFE has been part of the [RegAgri4Europe](#) Project. It is a two-year project (24 months) financed by the Erasmus+ Programme of the European Union. We are working together with other 6 partners from Belgium, Germany, and Greece, to promote, facilitate and accelerate the global transition to regenerative food, farming and land management in order to restore climate stability, increase biodiversity, rebuild soil fertility and produce healthy food.

In the framework of the RegAgri4Europe project, SAFE and its partners produced in 2021 a [policy brief](#) with recommendations, to enhance the effectiveness of sustainable agriculture, as for the EU to best meet its climate ambitions. This project has been co-funded with support from the Erasmus+ programme of the European Commission.

### **PermaModule Project**

The “Undergraduate University Module in Permaculture: Creating new synergies between higher education and professionals to promote sustainable systems” project – in short, [PermaModule](#) – is an Erasmus+ project under key action 2 (“Cooperation for innovation and the exchange of good practices”), which SAFE proudly coordinates since September 2019. We are designing an [undergraduate module](#) which will involve both university researchers/teachers and professionals in permaculture.

The module is built around a curriculum, including its teaching methodology, several intensive study programmes in permaculture; a student handbook to support lectures and on-field work from students; an online platform easy to use.

## **2. Food Safety and Information to Consumers**

As you are SAFE’s mission is to improve the representation of ordinary citizens in the EU debate concerning the future of EU food regulation. During the past year, SAFE achieved many of its goals

working on advocacy actions to improve information to consumers and achieving safer standards in certain types of food and for certain types of additives.

## 2.1. Titanium Dioxide (E171)

[Titanium Dioxide](#) (TiO<sub>2</sub>), also known as E171 in food, is commonly used as a white colourant in food, but also in coatings or medicine. E171 is a mix of TiO<sub>2</sub> particles, some of which can be defined as nanoparticles (being smaller than 100 nm).

On 6 May 2021, The European Food Safety Authority (EFSA) published its long-awaited safety assessment of titanium dioxide (TiO<sub>2</sub>) used as a food additive (E171). The assessment clearly underlines that TiO<sub>2</sub> (nano)particles have the potential to induce DNA strand breaks and chromosomal damage – thus, the agency stated that a concern for genotoxicity could not be ruled out. Overall, based on current existing evidence, it was concluded by the expert panel of EFSA that E171 “can no longer be considered safe when used as a food additive”. Moreover, EFSA also considered that it was uncertain “whether a threshold mode of action could be assumed”. SAFE – Safe Food Advocacy Europe welcomed the conclusions of this new safety assessment. NGOs and consumers alike have been calling for an EU-wide ban of this potentially harmful substance for several years. The new EFSA opinion applies to E171 as described in EC Reg. (EU) No 2031/2021 and paves the way for a revision of the second Annex of the Regulation (EC) No 1333/2008 listing authorised food additives – meaning that an EU-wide ban of the substance could finally come true.

## 2.2. Transparency of Information and Foods High in Fat, Sugar, and Salt (HFSS)

The issue of informing consumers on the food they consume, of all ingredients present in their food, or of the feed that animals in the food production chain will consume, is a topic that has always been at the core of SAFE’s actions, and it has been followed in recent years with particular interest by us and our members. Consumers should indeed be able to make informed choices by having clear and understandable information on food packaging, or by being sure that health messages on food products are scientifically justified, because without correct and comprehensive labelling information, there is no choice.

At the beginning of 2021, SAFE [contributed](#) to the EC’s Roadmap “Food labelling - revision of rules on information provided to consumers”, by stating that a harmonised front-of-packaging (FOP) nutrition labelling is needed to ensure consumers would be able to make healthy and sustainable choices. To achieve the goals of the Farm to Fork Strategy, it is paramount that the EC comes up with a proposal that could display all food components and products characteristics in a clear and understandable way. The new framework should be based on the principle that the main policy objective of FOP nutrition labelling is to help consumers to make healthier food choices.

In 2021, SAFE member Action on Sugar recently conducted a [study](#) on children’s yoghurts and misleading health claims. Evaluating over 100 children’s yogurts, the study has shown that only 1 in 20 of yogurts with child-friendly designs contain low sugar levels, with over 63% of these products containing more than a third of the daily sugar intake per portion. The main issue identified by the study is that all these products featured misleading packaging with deceitful health claims, with front-of-packs promoting the dairy products as high in protein, and a “source of calcium and vitamin D”. However, no mention is ever made as to their high levels in added sugar, syrups, or saturated



fat. Action on Sugar emphasised how these marketing techniques could be misleading for parents and constitute a genuine health thread given growing level of overweight and obese children in countries children in countries like the United Kingdom, where the study was conducted.

SAFE has supported the call to stop such misleading practices, agreeing to the need for tighter labelling and marketing rules to limit children exposure to sugar. However, there is very limited data on the digital life of children. In a recent report “Monitoring and Restricting Digital Marketing of Unhealthy Products to Children and Adolescents” (June 2018) WHO Europe indicated that more needs to be done to monitor and limit digital marketing of HFSS and other unhealthy products to children. SAFE agrees and support WHO’s statements, as exposing children to targeted online advertisement contributes to the development of obesity. If the EU wants to tackle childhood obesity, all risk factors need to be addressed. It is essential that national and European policy makers ban all HFSS products advertisements targeting young minds.

Moreover, SAFE also welcomed the EP’s move to protect the EU’s most vulnerable consumers by lowering excessively high sugar levels in baby foods. A [report](#) by the WHO’s Commission on Ending Childhood Obesity released on 25 January 2016, exposes distressing trends in obesity among children aged under five years. SAFE supported the results of the vote on processed cereal-based baby foods, contacted MEPs and stakeholders to urge the EU to adopt draft rules in line with the WHO’s recommendations to ensure the EU’s youngest consumers are provided with safe nutritious and adequate diets.

The institutional response arrived on the 8<sup>th</sup> of July 2021, when DG SANTE released its final [report](#) on the exposure of children to linear, non-linear, and online marketing of HFSS foods.

The goal of this study was to quantify such a marketing exposure to develop instruments to address the problem and ultimately fight youth obesity. This report coincides with the 2014-2020 EU Action Plan on Childhood Obesity, which aims to specifically tackle the issue of the marketing of HFSS foods targeting children.

However, the report emphasised that children were not specific targets of HFSS television spots, as most spots tend to be directed towards the general public. It specifically stated that the amended AVMSD has arguably helped lower exposure by fostering co-regulation and self-regulation, by namely setting a definition for restricted foods and beverages or the type of services to which regulations apply. Other instruments such as self-regulatory codes and other practices taken as part of the EU Pledge have helped ensure that the positive quality of such foods not be wrongfully broadcasted. Ultimately, this report goes to show that none of the measures in place at the EU, national or industry levels can grant full protection to this group.

The conclusion was that there is still a lot to be done on labelling and marketing rules to protect children from exposure to HFSS foods and empower them to opt for healthier diets.

### **2.3. Tackling Adolescent Obesity (TAO)**

February 2021 saw the end of one of the most successful projects designed by SAFE and 10 partners stemming from 5 EU Member States with very complementary profiles. We are talking about

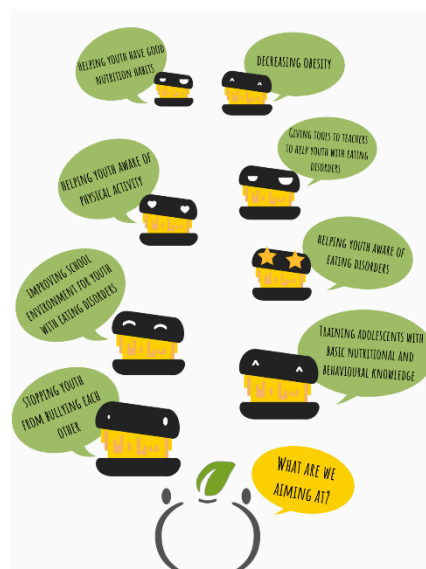
Tackling Adolescent Obesity (TAO), an educational project aimed at tackling adolescent obesity within the European Union.

In 2018, SAFE was selected to receive an Erasmus+ grant, which has allowed it to implement the project. The project ran for two and a half years from September 2018 until February 2021. With the other partners coming from very diverse backgrounds, SAFE was able to organise trainings in schools, to develop two nutrition handbooks for students and for teachers, and an interactive website to implement the trainings.

At the end of the project, on the 26<sup>th</sup> of February 2021, a virtual [conference](#), “**Tackling Adolescent Obesity: How to make a shift towards healthier behaviours**”, has been successfully organised to disseminate the project intellectual outputs and training at partner schools. The [event](#) attracted 200 participants from all over Europe and other parts of the world, including Belgium, Portugal, UK, Greece, Italy, Bulgaria, Singapore, Mexico, to name but a few. It was a great opportunity to discuss the challenges and opportunities to tackle adolescent obesity in Europe at multiple levels and to listen to the adolescents’ opinion on the issue.

SAFE was glad to collaborate on this project with partners such as European networks specialised in the field of nutrition and adolescent obesity like the European Childhood Obesity Group (ECOG) or the Italian and German national obese patient associations (AdipositasHilfe Deutschland, Amici Obesi), the Medical Faculty of Rzeszow, an association that gathers nutritionist and dietitians expert on plant-based diets (SONVE), a psychologist expert on obesity-related matters (Emotifood) and, last but not least, three high schools in which trainings were tested (Liceo Scientifico Enrico Fermi and Doukas School).

Following the test period, the educational material will be made accessible to all students and teachers at partner schools. Moreover, in order to reach more schools and implement the project at a broader scale, the materials are currently being translated into Polish and will all be freely accessible on <https://meet-tao.eu/>. Lastly, the project’s results and intellectual outputs will also be made accessible on the online platform “Erasmus+ Project results” and on the project’s collaborative online platform.



## 2.4. Vegan and Vegetarian Consumers and Animal Welfare

According to the Food and Agriculture Organisation of the United Nations (FAO), livestock production is responsible for about 14.5% of all human greenhouse gas emissions, more than all global transport. Studies estimate that realistic changes in dietary habits, involving lower levels of meat consumption, could reduce diet-related greenhouse gas emissions by 25-40%. Increased meat consumption, which would further stimulate industrial meat production, would have serious environmental consequences, and hinder the shift, if necessary, to sustainable agricultural practices that support the full range of ecosystem services.

To undermine the growing success of plant-based alternatives to animal products, an amendment was adopted by the Agriculture Committee (AGRI) of the 8<sup>th</sup> parliamentary term on 1 April 2019 in the context of the proposal for a regulation of the common agricultural policy (CAP) establishing a common organisation of the markets in agricultural products (2018/0218 COD). This amendment aims to prohibit the use, for products of plant origin, of names that have been typically associated with meat products and preparations, such as “steak”, “sausage” and “hamburger”.

SAFE, together with other NGOs kept on [reacting](#) in several open letters to MEPs to ensure that consumers are not prevented from making informed choices when buying food. In the last letter sent to the institutions in 2021, SAFE called on the European Commission and the Member States in the Council of the EU to stand by their original position in the CMO dialogues and oppose the EP’s Amendment 171 and Amendment 72. Despite the effort, Amendment 171 passed and introduced new, unnecessary, and extreme restrictions on the labelling of plant-based dairy products. Not only this might change and put plant-based food manufacturers at an unjustified and disproportionate disadvantage, but it might also deprive consumers of essential information about the suitability of plant-based products in their diets, and directly contradict the sustainability goals of the EU Green Deal and Farm to Fork Strategy. Amendment 72, on the other hand, introduced legal uncertainty that could jeopardize the labelling of plant-based food in the future.

For these reasons, SAFE will keep on advocating so that the EU could facilitate, not undermine, consumer shifts towards more plant-based diets, by standing up for consumers, and remaining in line with the EU’s Green Deal and Farm to Fork ambitions.

## 2.5. Acrylamide

Acrylamide is a chemical compound that is formed during most high-temperature cooking processes. It is naturally present in many everyday food products. Most industrial and commercial cooking methods can cause acrylamide formation (frying, roasting, baking). Cooking at home may also lead to the formation of this compound.

In June 2015 the European Food Safety Authority (EFSA) published its [first full risk assessment concerning the acrylamide in food](#). EFSA experts confirm that acrylamide in food can increase cancer risks for consumers of all age and consider it a public health concern. Considering standard diet composition and body weight information, children are the age group most exposed to acrylamide.

SAFE has been continuously working to raise consumer awareness on acrylamide, to inform about legislative developments, and to advocate to reduce the exposure of citizens to acrylamide through the adoption of strong legally binding maximum levels of acrylamide in our food. SAFE strongly believes that the Commission should change the current Regulation 2017/2158 on acrylamide, which provides a benchmark level of 40 µg/kg for the category of baby food. SAFE is still strongly concerned about the impact this value could have on the health of the youngest consumers and encourages the Commission to reconsider the setting of a lower acrylamide maximum level.

During the past year, SAFE [recommended](#) the Commission to establish safer binding levels for acrylamide in types of food largely consumed by young children, with particular reference to those biscuits, wafers, and breakfast cereal products that are directly marketed to children. Besides, we would like to highlight that benchmark levels for acrylamide in food are not strong enough and there

is a need for regulated maximum levels, as suggested in Recital 15 of Commission Regulation 2017/2158, which better protect European consumers' health.

During 2022 SAFE will continue advocate for the inclusion of Commission Recommendation categories in the acrylamide regulation 2017/2158 hoping that the monitoring of new categories will be taken into account by the European Commission.

## **2.6. #KnowYourBotanicals Campaign**

As many of SAFE's members are vegetarian and vegan associations widely using these kinds of products, we believe the topic of botanical food supplements and its related health claims constitutes a key issue which, if not addressed, could prevent the achievement of the Farm to Fork objectives.

[Botanicals](#) are “all materials (e.g., whole, fragmented or cut plants, plant parts, algae, fungi and lichens) including preparations obtained from botanicals by various processes obtained by various processes (e.g., pressing, squeezing, extraction, fractionation, distillation, concentration, drying up and fermentation)”. They can be used to create botanical food supplements, i.e., foodstuffs with nutritional or physiological benefits destined to supplement a normal diet and usually found in doses (e.g., capsules, pastilles, tablets, or pills, or liquids or powders with recommended intake amounts).

Botanicals can be regulated according to their medical or food uses, following different legislations. The medical use of botanicals is harmonised through the 2004 Traditional Herbal Medicinal Product Directive, aiming at providing a simplified regulatory approval process for traditional herbal medicines in the European Union (EU). According to the Regulation on food supplements, Member States are first and foremost responsible for classifying which product is to be considered as food or medicine. To this day, 19 Member States have adopted national laws on plants authorised in foods - often used to simultaneously incorporate the principles established at community level.

This duality means that, while botanicals are vastly accessible across the EU food market, the current lack of a harmonised definition of botanicals in food leads some products to be considered as “food” in one Member State, while being classified as “medicine” or both in another. There are several regulatory issues that lead the Commission to decide to create the “on-hold” list for many botanicals, creating a system misleading for consumers. In fact, the requirements for scientific substantiation for health claims on plants are difficult to meet, having now only 267 health claims authorised, most of which relate to essential nutrients, such as vitamins and minerals.

Given the described uncertainties, SAFE ran the [#KnowYourBotanicalsCampaign](#) to ask the EC to act to avoid further confusion caused by the legal grey zones embedded in the current regulatory framework.

To ensure the Farm to Fork and Green Deal objectives are achieved, we believe that these regulatory inconsistencies need to be tackled, and a new system for assessing health claims for botanicals needs to be found to allow consumers to be aware of their choices.

## **2.7. WeValueTrueNatural Campaign**

In 2021 SAFE carried out the WeValueTrueNatural campaign to raise awareness on the value of real natural food, to ensure that natural-labeled products are free from GMOs and synthetic substances,

and biodegradable. Consumers generally connect the term “natural” to positive associations related to origin, minimal processing and/or absence of additives, but the lack of a clear definition of the term can often be found on products which do not correlate with consumers’ expectations. Based on the analysis of the EU law, SAFE published a [report](#) identifying some considerations to apply the principles affirmed by the Green Deal in an effective and proportionate way. More than [30 MEPs](#) supported our campaign.

In details, we are convinced that the EU food law should clearly define the term “natural”, while foreseeing criteria to use the term on labels to ensure proper information to consumers. Information as the origin of the ingredients and the real composition of the products are not easily recognisable by consumers. The report showed the complexity standing on the current labelling regulatory framework. As we are witnessing a growing debate around sustainable labelling and a rising concern on empowering consumers in making healthy, sustainable, and informed choices, SAFE’s WeValueTrueNatural campaign has been and is still a tool to raise a common voice for safer and healthier food.

We conducted an intense campaign and managed to insert the issue of natural vs synthetic in the INI Report on the F2F Strategy from the European Parliament. Thanks to this action, the European Parliament acknowledged in an official initiative report the issue for European consumers.

## 2.8. Dual Food Quality Project

The “Empowering Consumer Organisations: towards a harmonised approach tackling dual quality in food products” ([ECO](#)) project is a European project funded by the Rights, Equality and Citizenship



Programme (REC) of the DG Justice of the EC. This project aims at limiting dual quality practices in food and strengthening consumer organisations in the EU. This one-year long project aimed to creating a structure based on consumer organisations and able to alert and provide the relevant authorities (at national and EU level) with a full and accurate assessment on dual food quality in the EU. The project developed harmonised training materials for consumer organisations to test food products and identify misleading branding strategies.

Moreover, we created an online platform to report and share test results and misleading branding strategies, which is provided to consumer organisations, to test at least 500 products uploaded by a 18 consumer organisations across Europe.

“Dual quality is a practice in which companies use different recipes, formulations or standards for items sold under the same brand name and with very similar looking packaging”. In the food sector, “dual quality” developed especially presenting products sold under the same brand and with the same or very similar packaging, but with different ingredients and quality depending on the European country where they were delivered. The Commission issued guidelines on the application of EU food and consumer laws to dual quality products to help national authorities to determine



whether a company is breaking EU laws when selling seemingly identical products with a different composition in different countries. The national consumer and food authorities are responsible for ensuring that companies comply with EU laws. However, the European Commission is committed to helping them through guidance and through different work strands.

**How to engage**

We hope you enjoyed reading about all the activities we accomplished during the past year, and we look forward to keeping on working with you to raise our voices for a safer and healthier food for consumers around EU.

If you would like to get involved, please do not hesitate to reach out to us:

**At our office**

Rue du Taciturne, 50 / Willem de Zwijgerstraat, 50  
1000 Brussels  
Belgium  
B.C.E.: 0578.909.064  
Tel: +32 (0) 2 898 38 38

**On our website:**

<https://www.safefoodadvocacy.eu/>

**On our social media channels:**



<https://www.facebook.com/SAFEFoodAdvocacy>



<https://twitter.com/SafeFoodEurope>



<https://www.linkedin.com/company/safe-food-advocacy-eu/>

<https://www.youtube.com/channel/UChWoVbNUDWIYnU5u8b0oEJw>

