



Association of the German  
Confectionery Industry

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## BDSI Statement of Position

### on the EU Commission's “Farm to Fork strategy for sustainable food”

The Association of the German Confectionery Industry (BDSI) welcomes the EU Commission's “Farm to Fork strategy for sustainable food” and is pleased to be able to make an important contribution to the EU's strategy. European foods, such as confectionery, are known for their safety and high quality.

As a trade association and an employers' association, the BDSI represents the interests of the predominantly medium-sized companies in the German confectionery industry. The sector, featuring over 200 companies employing around 50,000 workers, produces a very broad range of products for the domestic and international market, generating an annual turnover of around 12 billion euros.

The German confectionery industry supports the efforts being undertaken to ensure that the high quality standards applicable in the EU are now also to become the global standard for sustainability and is convinced it can make a key contribution to the planning, development, and implementation of appropriate measures.

#### **A sustainable food strategy is the objective**

The key objective of the European Green Deal is to bring about sustainable ecological change. Developing a sustainable food strategy is crucial to achieving this Green Deal goal. In this respect, sustainability has many facets which act together at all levels of the value chain, hence only a holistic approach can lead to sustainable success.

The German confectionery industry shouldered takes its share of this responsibility very seriously and is already undertaking a great many efforts in areas where it can influence sustainable development, be it in the cocoa sector, with regard to other food raw materials, such as palm oil or hazelnuts, helping towards the prevention of illegal deforestation, or resolving issues in the field of packaging. The key point is that all European companies, regardless of their size, can become involved in this process.

What is more, holistic sustainability can only be achieved if all the actors concerned pull together. The efforts undertaken by the confectionery manufacturers can only succeed if all the actors along the food value chain, without exception, are involved in these sustainability efforts, lending them their support and actively working

## Competence in Confectionery since 1877

together to ensure their implementation. This particularly includes the governments in the producing countries, the German federal government in cooperation with the governments of the other EU member states and the EU in cooperation with the producing countries, the agricultural trade, the standards and certification organisations, the food retailers, civil society, and ultimately the consumers.

### **Sustainable food consumption**

The BDSI welcomes the fact that the “Farm to Fork strategy for sustainable food” aims to stimulate sustainable food consumption and thereby promote the goal of “affordable food for all”. Moreover, the EU Commission’s approach of supporting consumers in choosing a balanced and sustainable diet and its efforts towards reducing food waste are fully deserving of approval. Furthermore, this proposal for improving the information provided to the consumer is key in helping him or her to make an independent choice when choosing what food to eat. However, it must be ensured that the additional information provided – for example as regards the origin, nutritional value, or environmental impact of a particular food – is demonstrably required, non-discriminatory, and meaningful. In addition, a decisive prerequisite must be that the provision of additional information is actually feasible and proportionate.

German confectionery manufacturing companies are dedicated to providing a high level of product transparency. This is already comprehensively guaranteed by the Food Information Regulation (EU) No 1169/2011 (FIR). In addition to the mandatory information provided on ingredients, energy content, and nutrients contained in the product, such as carbohydrates, sugar, fat, saturated fatty acids, protein, and salt in the form of the nutrition table, consumers are given additional information as further help and guidance. This is achieved, for example, by using the reference-intake model that is voluntarily displayed front-of-pack in addition to the nutrition table, offering consumers a quick guide. Seen from the sector’s perspective, all the information provided must be science-based and understandable.

Information systems that go beyond this point will only be of additional help to consumers if the same requirements are met, i.e. they are not only understandable but also non-discriminatory and science-based. Above all, they must be proportionate, i.e. the added value and the need to provide information to consumers must be weighed against the additional effort and extra costs for the trade, the manufacturers, their suppliers, and all the way down to the individual farmer. This applies to all new and further-reaching labelling approaches, whether it be, for example, a pan-European, voluntary front-of-pack (nutritional) labelling scheme, environmental/sustainability or animal welfare labelling, or other indications of origin.

We consider the possibility of making additional food information digitally available to be an excellent approach and lend it our full support.

### **Healthy lifestyle**

The BDSI advocates maintaining a balanced diet and an active lifestyle where confectionery products also have their rightful place as goods primarily consumed for pleasure and enjoyment. Any debate on boosting healthy food consumption must include all the various aspects relating to the occurrence of obesity and other non-

communicable diseases so as to enable development of a promising approach. For obesity and other non-communicable diseases have many underlying causes, including lack of physical exercise. It is hardly promising for a single cause to be viewed in isolation whilst other causes are left aside. Only a multifactorial approach holds any promise of success.

#### ► **Overweight prevention**

It is this conviction that leads the BDI to support the German Platform on Diet and Physical Activity (peb) as an active member. Here one has adopted an integrated approach to preventing overweight. This recognises the fact that the occurrence of overweight is a multi-factorial process and a challenge for society as a whole. Viewing nutrition in isolation or analysing the consumption of individual foods, or even the intake of certain nutrients, alone will not help provide a conducive and sustainable solution. We call for any and all deliberations on the prevention and reduction of obesity to be focussed not on a single aspect, as is often the case at present, with emphasis being given to nutrition alone or individual foods, and instead argue that key emphasis should be given to efforts that society as a whole needs to find and undertake to teach people decision-making skills in all areas of their lives from an early age onward.

#### ► **Pleasure and enjoyment**

Pleasure and enjoyment or the capacity to experience these emotions is a health-contributing factor that should not be underestimated: the capacity to experience pleasure and enjoyment, together with a balanced diet and sufficient physical activity and relaxation, is conducive to a healthy lifestyle. Confectionery, snack products, and ice cream are first and foremost products we consume for our pleasure and enjoyment. They are the little pleasures in our everyday lives and – mindfully enjoyed – fit well into the concept of a balanced and enjoyable diet.

#### ► **Innovation and reformulation**

The confectionery industry offers a wide-ranging choice of products to suit every requirement and taste. It sees changing consumer demands as an opportunity, is continuously developing its range of products based on careful consideration of consumer demands and market conditions, and responds flexibly to new requirements and findings. In addition to its classic and traditional products, which have enjoyed long-standing market success and should be left to exist unchanged, it also offers numerous sugar-reduced, fat-reduced, salt-reduced, gluten-free and lactose-free versions as well as other innovative products. In addition, confectionery, snack products, and ice cream are available in very diverse portion and pack sizes, including many small and resealable packs. The diversity of products made by the confectionery industry comes from its innovation and reformulation activities which, even within the scope of already existing possibilities, are continuously being driven forward. However, these are subject to certain limitations, as is the development of new products:

- of the technological kind (e.g. sugar crispens up biscuits and fine bakery wares and, without sugar, ice cream would lose its creamy texture);
- quality and safety aspects (e.g. the sugar in fruit fillings prevents the development of microorganisms and hence has a naturally preserving effect);

- legal requirements (e.g. the EU Cocoa Directive and the German Cocoa Ordinance for Chocolate set minimum specifications for cocoa butter content, and the use of sweeteners is also sometimes subject to excessively strict requirements).

In this respect, however, formulations are the sole responsibility of the companies who invented them and are in many cases the cornerstone of a brand. Formulations may not be encroached on by legislative requirements and it should be left to the companies themselves to decide if and when changes are to be made to their products and which new developments/innovations are to be implemented.

All this must be considered within the scope of options debated within the strategy's framework and, with regard to the said limitations, must be appropriately resolved by way of setting statutory requirements. The objective must be to continue to be able to produce tasty and innovative products that meet the individual requirements of individual diets.

### ► **Media literacy**

Within the scope of deliberations being made on healthy food consumption, the BDSI advocates the development of concepts to communicate and strengthen media competence, especially among children<sup>1</sup>. In order for children to find their way around in the modern media world, they must learn how to handle modern media and advertising, and develop advertising literacy. Children can best develop these skills if they are taught to think independently at an early age and hence become empowered to think autonomously and independently about how they deal with media offerings.

Food advertising is already comprehensively regulated today. This is because it is subject to numerous legal regulations and, in addition, regulations voluntarily imposed by the industry. These likewise apply to online advertising.

Here again, the confectionery industry has already faced up to its share of the responsibility. The member companies of the BDSI comply, as does the entire German food industry, with the code of practice laid down by the German Advertising Standards Council (DW) governing all forms of commercial communication on foods and support a catalogue of criteria that is to be observed in the case of online advertising on websites for children. For example, in Germany it is forbidden for children's TV and radio programmes to be interrupted by advertising. In addition, advertising must be made clearly distinguishable as such to children.

At European level renowned food manufacturing companies, including confectionery producers, have taken a united stand within the scope of the so-called EU Pledge. Among other things, they have agreed to not direct any advertising towards children under 12 years of age, except in the case of products fulfilling specific nutritional criteria.

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<sup>1</sup> Children are young persons under the age of 12.

### **Establishing a recycling-system economy**

The German confectionery industry has a strong interest in handling the required resources in a forward-looking and efficient manner. This is particularly true when it comes to food packaging.

Hence packaging material has been continuously reduced by the manufacturers for a number of years. Plastic packaging has become ever lighter since the introduction of the recycling-system economy in 1991, together with the establishment of the Germany's Dual System (DSD) for waste avoidance and recycling. As a result of technical progress in the manufacturing sector, the use of plastic packaging is now 35% lower than what counted as state-of-the-art technology in 1991. It is for this reason that the manufacturers of German confectionery have a great interest in continuing along this path, thereby helping to further reduce the corresponding environmental impact.

The development of recyclable packaging solutions should therefore be promoted within the framework of the "Farm to Fork strategy for sustainable food". Innovation must be the instrument used to achieve the goal of increasing recyclability and achieving a higher level of degradability. Research must also focus on the factors energy balance, carbon footprint, and the environmental footprint of recycling or thermal recovery.

Food safety is of paramount concern for the confectionery industry and its many diverse products. This must be given top priority in all ongoing deliberations. For reasons of hygiene, among other things, confectionery must be effectively protected against the entry of contaminants, microbial spoilage – such as bacteria, yeasts, and fungi – and against light and oxidation. This protection must be ensured throughout the product's entire shelf life. For consumers simply must be able to rely on the safety of the confectionery products they eat.

### **SMEs**

Given the fact that 90% of the BDSI's members are small and medium-sized enterprises (SMEs), as is likewise true of the sector's make-up across the entire EU, the BDSI would of course welcome it if the current "SME strategy for a sustainable and digital Europe" also expressly provided support for SMEs in implementing the "Farm to Fork strategy for sustainable food". This is because the "Farm to Fork strategy for sustainable food" also represents a key part of the transition to sustainability and digitisation within the framework of the Green Deal, and SMEs, in particular, urgently require support in ensuring its implementation for the reasons stated in the SME strategy.

For more information on BDSI positions please visit  
<http://www.bdsi.de/en/priorities/overview-of-all-topics>

Bonn, 10 March 2020

#### *The sector association:*

*The BDSI represents the economic interests of over 200 mostly medium-sized German confectionery companies. It is both a trade association and an employers' association. The German confectionery industry is the fourth-largest sector of the German food industry, accounting for around 10% of overall sales. It is particularly characterised by its strong focus on exports. Germany's confectionery manufacturers have an overall workforce of around 50,000 employees.*