

IMACE Contribution to the Public Consultation on the JRC Draft Report: Sustainable Public Procurement (SPP) for Food, Food Services and Vending Machines (May 2025 Draft)

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Submitted by: IMACE – European Margarine Association

Executive Summary

IMACE welcomes the European Commission's initiative to strengthen Sustainable Public Procurement (SPP) criteria for food, food services and vending machines, as developed by the JRC. We strongly support the integrated approach that considers not only environmental aspects but also nutritional, social and economic dimensions.

In this submission, we highlight the important role that **margarine and vegetable oil-based spreads** can play in delivering on both nutritional and environmental objectives of sustainable public procurement:

- Margarine and spreads are **low in saturated fats**, typically much lower than animal-based fats such as butter.
- They are **rich in unsaturated fatty acids**, including polyunsaturated and essential omega-3 fatty acids, which contribute positively to cardiovascular health.
- They contain **minimal trans fatty acids (TFA)**, fully complying with EU regulations.
- From an environmental perspective, plant-based margarines and spreads generally demonstrate a **lower carbon footprint, lower land use, and lower resource intensity** compared to animal fat-based alternatives.

IMACE encourages the European Commission and JRC to strengthen the recognition of these benefits in the final SPP criteria, by more explicitly recommending actively **plant-based margarines and spreads** as suitable fat sources and as replacement of butter or butter-based fats for public procurement, while reflecting the evidence-based differences in nutritional composition and environmental performance.

General support for the JRC draft report

IMACE appreciates the comprehensive and balanced approach taken by the JRC in the May 2025 draft report. The integration of nutrition and health into sustainable public procurement represents a major step forward and is in line with EU public health and sustainability goals, including:

- The European Green Deal
- Farm to Fork Strategy
- EU's Vision for Agriculture and Food (February 2025)

We fully support the inclusion of specific **nutritional criteria for fat content**, as well as the section on **more environmentally friendly vegetable fats (Section 3.1.5)**. The report rightly acknowledges that vegetable oils and plant-based fats contribute to healthier diets and lower environmental burdens.

Nutritional profile of margarines and spreads

The proposed nutritional criteria in Section 6.1.1.2 on fat composition align closely with current public health recommendations. Within this framework, **margarine and vegetable oil-based spreads provide a highly suitable option for public food procurement**:

- **Low saturated fat content:** Typically 60–80% less saturated fat than butter, helping reduce population intake of saturated fats in line with WHO and EFSA recommendations.
- **Rich in unsaturated fats:** High levels of monounsaturated and polyunsaturated fats, which have been shown to lower LDL cholesterol and support cardiovascular health.
- **Source of essential omega-3 fatty acids (ALA):** Contributing to adequate intake of essential fatty acids in the general population.

Numerous dietary guidelines from WHO, EFSA, and EU Member States encourage substituting saturated fats with unsaturated fats. Many national guidelines specifically **advise replacing butter with vegetable oil-based margarines and spreads**.

Trans fatty acids (TFA): Margarines vs dairy fats

We fully support the report's recognition of the importance of minimizing trans fatty acid intake.

- Modern margarine and spread formulations are **fully compliant with EU legislation** (maximum 2g TFA per 100g fat as per EU Regulation 2019/649).
- In practice, most plant-based spreads today contain **negligible TFA levels** (typically below 0.5g/100g fat).
- Natural dairy fats (including butter) contain **ruminant trans fats** that are typically present at levels between 3–6g/100g fat, contributing to overall TFA intake in the population.

While ruminant TFA may have slightly different metabolic effects, EFSA has stated that TFA intake should be kept as low as possible from all sources. In the current EU context, **natural dairy fats have become a significant remaining source of dietary TFA intake**, as industrial TFA sources have been largely eliminated.

Environmental performance of margarines and spreads

The inclusion of environmental criteria for vegetable fats (Section 3.1.5) is highly relevant. Multiple life cycle assessments (LCA) consistently show that **plant-based margarines and spreads have a significantly lower environmental impact** compared to animal-based fats:

Environmental Indicator	Margarine & spreads(plant-based)	Butter
GHG emissions (kg CO ₂ eq per kg)	~1–3	~9–12
Land use (m ² /kg)	Lower	Higher
Water use	Lower	Higher

Sources: Poore & Nemecek (2018, Science), IMACE internal LCA studies

This lower environmental footprint supports the objectives of the EU Green Deal, Farm to Fork strategy, and the Climate Target Plan, particularly in relation to GHG reduction and resource efficiency.

Proposed recommendations for strengthening the final criteria

IMACE respectfully suggests that the final SPP criteria could better reflect the strong alignment between plant-based margarines and spreads and the policy objectives set by the EU by:

1. **Explicitly recognizing margarine and vegetable oil-based spreads as a preferred category** of fats for public procurement, next to the vegetable oils, fully compliant with both nutritional and environmental targets.
2. **Encouraging substitution of high-saturated butter products** with plant-based alternatives such as margarines and spreads as a concrete implementation measure for healthier and more sustainable menus.
3. **Highlighting the negligible TFA content** of modern plant-based spreads, reinforcing their suitability for public procurement where TFA minimization is desired.
4. **Continuing to integrate LCA-based environmental assessment** that recognizes the significantly lower carbon and resource footprint of plant-based fats compared to animal fats.

Conclusion

We thank the JRC and the European Commission for the opportunity to provide input into this important consultation. IMACE remains fully committed to supporting the EU's objectives on sustainable and healthy food systems, and stands ready to contribute further scientific, nutritional and technical expertise as the development of the SPP criteria continues.
