

IMACE MANIFESTO 2026–2029

Food Is Strategic. Our Sector Delivers. Europe Must Act.

The European margarine and spreads sector is one of the most efficient converters of plant-based raw materials into affordable, heart-healthy, and low-carbon food products. We serve millions of Europeans daily, providing vitamins and essential fatty acids – in households, bakeries, patisseries, and foodservice. Our industry is a €200+ billion value chain multiplier and a cornerstone of EU food security.

Yet this strategic sector is held back by regulatory fragmentation, an uneven playing field within the yellow fats category, and a failure to fully harness the health benefits our sector can deliver.

At a time when the Draghi Report warns that Europe’s competitiveness model is broken, the Niinistö Report on EU preparedness and the Munich Security Conference both identify food as a geopolitical weapon, this manifesto sets out what IMACE asks of EU policymakers – and what we offer in return.

What our sector delivers

<p>AFFORDABILITY</p> <p>Margarine price on average in Europe: €3.1/kg vs Butter: €5.8/kg^{1,2}</p> <p>Nearly half the price for consumers</p>	<p>ENVIRONMENTAL PERFORMANCE</p> <p>2–3x lower CO₂ footprint and 50% less land & water use vs butter³</p> <p>Supports near- and long-term decarbonisation</p>
<p>HEART-HEALTH PERFORMANCE</p> <p>Trans fats eliminated below 1% since 1990s</p> <p>Source of healthy unsaturated fatty acids & vitamins. Recommended by many national dietary guidelines</p>	<p>FOOD SECURITY</p> <p>Long shelf-life, options for ambient storage</p> <p>Resilient supply chains, strategically important dietary source of unsaturated fats</p>

1. Cut Red Tape, Trust Science, Enable Innovation

The Competitiveness Compass promises simplification. The margarine sector needs it delivered. Duplicative supplier data demands, redundant audits, and trickle-down obligations from directives designed for multinationals (CSDDD, CSRD, EUDR) are suffocating the mid-caps and SMEs that form our sector’s backbone.

Equally damaging is the rise of the “Ultra-Processed Foods” ideology. Processing-based food classification systems such as NOVA are not scientific tools to evaluate the nutritional

quality and healthiness of foods. If the EU allows such classifications to drive nutrition and health policies, it will penalise the very innovation and autonomy that could unlock international competitiveness: reformulation, heart-healthy products, fermentation-enabled ingredients, functional emulsifiers, and New Genomic Techniques for climate-resilient oil crops. Meanwhile, Europe's competitors in Asia and the Americas are embracing food technology and innovation to ensure long-term food security.

We call on the EU to:

- Implement a genuine “tell-us-once” principle and digital-first approach to reduce administrative burden
- Reject processing-based food classifications as a basis for regulation and adopt science-based standards that evaluate nutritional composition, food quality and safety
- Ensure the nutritional value of foods is considered fully in on-pack nutrition information disclosures – e.g. including trans-fat labelling
- Increase EFSA capacity to clear the novel food approval backlog and keep pace with global innovation
- Establish EU regulatory sandboxes for novel food ingredients, allowing regulators and applicants to jointly test innovative products, processes, data requirements and methodologies prior to full authorisation
- Involve industry experts in implementing acts for EUDR, PPWR, and simplification omnibuses to ensure practical workability
- Improve analytical and sampling methods for emerging contaminants before using questionable data as a basis for regulation
- Include heart-healthy products (including products made with plant oils) in public procurement criteria for schools, hospitals, and public institutions – in line with many national and international dietary guidelines

2. Create a Genuine Level Playing Field

The EU's goals of strong, healthy competition and a smooth-running Single Market are not supported by its current policy framework regarding the yellow fats category. Within this category, there are discrepancies in incentives, restrictions and fiscal measures. Unequal VAT rates between competing yellow fats products of animal origin (butter) and plant-based alternatives (margarines and vegetable fat-based spreads), distorting consumer choice. Higher CAP subsidies for dairy products. Protection of “dairy terms” that prevents common-sense product descriptions.

If the EU is serious about a thriving economy and a transition to more resilient and sustainable food systems, it must address market distortions that undermine fair competition and environmental outcomes, while putting in place a coherent EU framework to inform and incentivise consumers towards plant-based options, in line with clear scientific evidence and

climate targets supporting more plant-rich diets. This would support environmental and health outcomes at a lower cost to citizens.

We call on the EU to:

- Empower Member States to ensure fair VAT treatment across comparable products, including animal-based and plant-based alternatives, and remove EU-level obstacles to such alignment
- Adopt a function-based approach to nutrition and environmental labelling – comparing products by what they do in the diet, not by their origin – to allow fair comparison between product categories, and reflect the choices consumers make at the supermarket shelf
- Rebalance CAP support to reward good stewardship of land, agricultural resources, and food production, incentivising future-proof, resilient supply chains
- Put in place a coherent EU framework to inform and incentivise towards plant-based options

A level playing field also requires harmonisation. Fragmented national regulations on labelling, product denominations, and contaminants force manufacturers to navigate 27 different rule sets. This “gold-plating” destroys the economies of scale that our sector needs to remain competitive. We call for a decisive halt to further market fragmentation and full harmonisation of rules affecting our category.

3. Recognise Food as a Strategic Geopolitical Asset

The weaponisation of food production and trade dependencies have made food security a hard national security issue – not a development afterthought.

The EU margarine and spreads sector sits at the crossroads of European oilseed production and global trade flows. The European refiners process 18.4 million tonnes of vegetable oils annually and the margarine and spreads sector is the primary food outlet for the EU’s refining industry. Europe is largely self-sufficient in rapeseed, sunflower, and soy oils for food but remains structurally dependent on imports of tropical oils.

Margarines and spreads have resilient supply chains, are good vehicles to provide essential fatty acids, as well as vitamins such as A, D and E, and should be considered strategically important in terms of food security, and of nutrition security.

We call on the EU to:

- Designate plant oil value chains as strategically important for EU food security
- Enforce a “Food First” principle: edible oils must be prioritised for human consumption before diversion to biofuels
- Strengthen diversified global sourcing through standard equivalence and removal of disproportionate trade barriers, while incentivising domestic oilseed production

- Recognise the contribution of ambient, long shelf-life products to resilient and readily deployable food supplies within the European Food Security Crisis Preparedness and Response Mechanism (EFSCM)
- Ensure that country-of-origin labelling proposals apply to the place of production, not to individual ingredients, to avoid undermining the diversified sourcing that underpins EU food security

We are ready to deliver. Remove the barriers.

About IMACE

IMACE is the European Margarine Association, the only European organisation fully dedicated to representing margarine and plant-based spreads. Our members are leading in nutrition, sustainability, competitiveness and innovation — from optimising the fat composition of products to driving healthier, affordable plant-based diets. IMACE gives the industry a strong voice in Europe, shaping fair regulation and promoting the role of margarines and spreads in building a healthier and more sustainable future.

For more information, visit www.imace.org.

¹Eurostat, *Comparative Price Level Indices for Food, Beverages and Tobacco*

²European Commission, *Dairy Market Observatory (butter prices)*

³Comparative LCA of margarine and butter consumed in UK, France and Germany, 2010, Katarina Nilsson and Anna Flysjö