

17 June 2025

EFFCA Contribution to the Call for Evidence on the Bioeconomy Strategy Update

The European Food and Fermentation Cultures Association (EFFCA) welcomes the Commission's initiative to update the EU Bioeconomy Strategy and strongly supports its ambition to promote a circular, regenerative and competitive bioeconomy. Microbial food cultures and fermentation processes are essential tools in this transition, delivering tangible environmental, economic and societal benefits across the food system and beyond.

Fermentation is one of the most established, efficient and scalable biotechnologies. It plays a central role in sustainable food systems by supporting food safety, shelf-life extension, resource optimisation, and the valorisation of biomass. Microbial food cultures are live, active ingredients that contribute to flavour, texture, preservation and nutritional value in a wide variety of traditional and innovative foods, from cheese and yoghurt to plant-based products. They drive circularity, reduce food loss and waste, and offer nature-based solutions aligned with EU climate, biodiversity, health and agri-food policy goals.

Despite their strategic importance, microbial food cultures remain largely invisible in many EU policy frameworks and underrepresented in innovation support and funding programmes. EFFCA urges the Commission to explicitly recognise fermentation and microbial food cultures as enabling technologies of the EU bioeconomy, deserving of dedicated support in research and development, industrial scale-up, infrastructure investment, and training and skills development.

Regulatory bottlenecks are currently limiting the full contribution of microbial innovations. A persistent challenge is the legal uncertainty surrounding food cultures with bioprotective effect. While widely recognised as food ingredients under Regulation (EC) No 178/2002, some Member States interpret certain uses as falling under the Food Additives Regulation (EC) No 1333/2008. Such a shift would entail disproportionate pre-market authorisation requirements and EFSA evaluations, placing a heavy burden on SMEs, fragmenting the internal market, and discouraging the use of effective, natural bioprotection tools that reduce food waste and improve food safety.

EFFCA calls for clear and consistent recognition of these cultures as food ingredients. We also support the introduction of a voluntary labelling approach, such as "protected by fermentation," to ensure transparency for consumers without triggering additive classification. Industry-developed standards and self-regulatory guidelines already ensure traceability, quality, and safety.

Innovation in microbial strain development is also held back by the absence of a clear regulatory pathway for the deliberate release of food microorganisms improved through new genomic techniques (NGTs). These techniques, such as targeted mutagenesis and cisgenesis, allow for

precise, predictable improvements aligned with EU sustainability and health goals. A fit-for-purpose, product-based, and risk-proportionate framework is urgently needed to unlock this innovation potential and prevent the relocation of research, investment and talent outside the EU.

EFFCA supports the Strategy's priorities, including increasing the high-value use of biomass, improving circularity, supporting rural livelihoods, and enabling sustainable bio-based production. The revised strategy should ensure that microbial food cultures and fermentation technologies are fully integrated into relevant policy roadmaps, R&I priorities, funding programmes, and the EU's bioeconomy monitoring system.

EFFCA and its members are committed to contributing technical expertise and sector-specific knowledge to support the Commission in shaping a science-based, innovation-driven and inclusive bioeconomy. We stand ready to collaborate to ensure that microbial food cultures and fermentation continue to advance Europe's sustainability, resilience and competitiveness.