

STAYING THE COURSE

amid political headwinds

As we move into the final quarter of 2025, it is increasingly evident that Europe is entering a new era, politically uncertain, economically volatile and strategically ambiguous. While headlines are dominated by sudden U-turns in policy, cross-Atlantic tensions and fragmented leadership within EU institutions, one truth remains unchanged: our sector cannot afford to stand still.

The savoury snacks industry has long been one of the most agile and innovative players in Europe's food and drink landscape. But now, more than ever, we must not merely adapt to the times. Instead, we must actively shape them. As policy pivots and political winds shift, our role as a stable, trustworthy and forward-leaning actor has never been more critical. In a world of diminishing predictability, clarity of purpose becomes our most valuable commodity.

BUSINESS DEMANDS DIRECTION

Let us be frank: the recent political twists and turns in Brussels seem to have exposed serious cracks in EU governance. The withdrawal and then partial un-withdrawal of the Green Claims Directive – an emblematic file of the EU's green ambition – has sent confusing signals to businesses and society at large. The directive was meant to crack down on greenwashing and restore trust in sustainability claims. Instead, it has become a political football, kicked between institutions afraid of owning its consequences.

This saga was more than a communications misstep; it revealed a deeper institutional malaise: an inability to offer long-term direction with confidence. Policy retreats dressed as simplification exercises are slowly dismantling what was



Sebastian Emig
explains why the
snacks sector
must lead, even as
others falter

once a strong and coherent Green Deal. The narrative has shifted from “transformational change” to “administrative burden reduction,” leaving industries like ours navigating a regulatory landscape where clarity is lacking and ambition is in retreat.

For manufacturers and suppliers in the snacks sector, this policy paralysis is more than a Brussels drama; it affects the decisions we make every day. Can we invest in sustainable packaging if labelling laws remain in flux?

Our position remains firm: smart, science-based regulation that provides certainty and incentivises innovation is not a luxury; it is a necessity. We continue to call for a predictable regulatory environment, harmonised, and anchored in the long-term needs of Europe's food system.

WHEN TRADE BECOMES A WEAPON

Beyond internal EU matters, we are also

witnessing an erosion of the international rules-based trading system. The reintroduction of US tariffs on European exports – and the EU's reluctant acceptance of retaliatory measures – marks a low point in transatlantic trade relations.

Let us be clear: this is not just a trade dispute, it is a systemic test. Europe's willingness to accept questionable tariffs without pushing back risks normalising coercive trade tactics and weakening the very foundation upon which our industry depends: open, rules-based commerce. The consequences for our sector are tangible. Higher input costs, reduced access to critical ingredients, and rising uncertainty across global supply chains must be addressed with urgency.

ESA has already taken proactive steps, aligning with affected sector associations, engaging with MEPs and participating in consultations with the Trade Commissioner. Our message is simple: trade must remain fair, transparent and reciprocal. Mirror clauses and high environmental standards should not become bargaining chips in transatlantic disputes. We will continue to defend the interests of European snack producers and suppliers with vigour and resolve.

COMPETITIVENESS AT A CROSSROADS

The Draghi Report, commissioned to inform the future of European competitiveness, offers a sobering analysis: food and drink, the EU's largest manufacturing sector by employment and turnover, lags behind global peers in productivity and investment. Between 2008 and 2023, the EU's share of global food exports declined while rivals surged ahead. EU food companies invest ▶



Snack Seasonings

FLAVOURS OF WELCOME

2026 World Cup Special

For snack producers, the Soccer World Cup is more than a sporting event – it's a flavour opportunity. Seasonal Concepts like this turn global excitement into sales momentum.

Our new snack seasoning concept "Flavours of Welcome" celebrates the host nations Mexico, the USA, and Canada with bold, authentic tastes inspired by their diverse cuisines. The concept range spans from Smoky Kansas BBQ and Spicy-Dill Pickle heat to vibrant Chipotle & Lime and indulgent Salted Maple Syrup notes.

Now is the time to start your project and launch your World Cup snack right in time for the kick-off!



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for more
snack
seasoning
variety!



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between two and five times less in R&D than those in the USA or China. Our productivity per worker is half that of our American counterparts.

This must change. For our industry, this means a renewed focus on innovation, efficiency and sustainability; not as buzzwords, but as real strategic levers. Investment in food tech, fairer trading conditions, infrastructure modernisation and a robust export strategy are no longer optional; they are existential imperatives.

Our sector is already doing its part. Across Europe, snack producers are reformulating products to reduce salt and fat content, investing in plant-based innovation, adopting AI in manufacturing and improving packaging circularity. But these efforts must be matched by enabling policy. Streamlined regulation, faster approval pathways, and investment incentives must be part of a renewed competitiveness agenda.

SIMPLIFICATION OR POLICY DRIFT?

The new political cycle in Brussels has brought with it a wave of so-called "omnibus" legislation, aimed at simplifying regulation and lifting administrative burdens. In theory, this should be welcome. In practice, it has often translated into policy drift and the quiet burial of important initiatives. Many of you will have noticed that terms like "Farm to Fork" and "Green Deal" are disappearing from Commission communications. Sustainability objectives are being de-scoped. Food policy is being decentralised without a clear strategy to guide the transition.

Let me be clear: simplification must not come at the expense of strategic coherence. The fragmentation of responsibilities among different Directorates-General, especially between DG AGRI and DG SANTE, risks leaving the food system without a central steward. ESA continues to advocate for a holistic approach to food governance; one that recognises the interdependence of farming, food processing, nutrition, trade and the environment.

We urge the Commission to provide clarity on its food vision, engage industry early in the legislative process, and avoid the stop-start policy cycles that undermine business confidence. With a new Vision for Agriculture and Food expected from the Commission, we will be working to ensure that snacks are not forgotten.

REFLECTIONS AND OUTLOOK

As we look back on 2025, I want to take a moment to sincerely thank all ESA members for their strong support of the Secretariat on key regulatory matters. Your efforts have been instrumental in raising awareness of both the challenges and strengths of our sector among policymakers and opinion leaders.

Looking ahead, 2026 promises to bring not only challenges but also many exciting opportunities.

A heartfelt thank you to all my colleagues and our members for your dedication, professionalism, and teamwork – your contributions are deeply appreciated.

On behalf of the entire ESA team, I wish you and your loved ones a joyful festive season and a happy, prosperous New Year. ■

Director General Sebastian Emig*

*in his capacity as permanent representative of Prime Consulting BXLBCN SL