



**Food policy has grown into a vibrant area of European policy with multiple links to public health. In the next months and years, the 'Farm to Fork Strategy' will introduce a range of initiatives with significant health opportunities. 'Europe's Beating Cancer Plan' and the EU 'Common Agricultural Policy' (CAP) will offer additional pathways to address food-related health concerns.**

**The present survey asks for your input to update EPHA's narrative and positioning on food and health. This will enable us to have a stronger common voice on EU food policy.**

**Your feedback is very important. Thank you for participating in this survey which should take around 30 minutes to complete.**

*Please respond by: 30 October 2020*

**\* 1. This is a members-only consultation. Are you currently a member of the European Public Health Alliance (EPHA)?**

Yes (you will continue to the questions)

No (this will be the end of the survey)

**This survey asks questions to EPHA members about different food-related topics** to update EPHA's positioning and allow a stronger common voice on current issues in food and agricultural policy.

**Results from this survey** will be used to draft a general EPHA approach to the Farm to Fork Strategy and to provide guidance for preparing positions on specific policy files.

While responding, please be aware that:

- This survey asks for your input on strategic issues, taking into account EPHA's role as a public health organisation. It does not replace further member consultations on specific policy positions.
- The survey includes different types of questions, ranging from open questions, to multiple choice questions, to questions asking to comment on proposals for an EPHA approach.
- Should there be diverging views on any of the questions, a process will be found to reach a consensus.
- This survey is without prejudice to the outcomes of EPHA's strategic review and the overall priorities agreed therein.

Should you have any **comments or questions** for clarification, please contact EPHA's food systems policy lead at [nikolai@epha.org](mailto:nikolai@epha.org)

\* **2. Which organisation do you represent?**

**Name + Surname**

**Name of organisation**

**Email Address**

**3. Does your organisation pursue priorities on food-health related topics?**

- Yes (please briefly mention these priorities in the comment box below and/or add link to any relevant document)
- No, but we are considering to engage more on the topic
- No
- Other

Comment:



**Start of the survey.**

**To facilitate your navigation, the survey is divided into 10 sections:**

- A.** Which front-of-pack nutrition labelling scheme?
- B.** 'Ultra-processed food': a new food-health category?
- C.** A food systems approach to food and health?
- D.** From diets to food environments?
- E.** Which obesity and NCD prevention policies to prioritise?
- F.** Towards 'less and better' meat, dairy and eggs?
- G.** How to align food systems transition with a social justice agenda?
- H.** What place for alcohol in the food policy debates?
- I.** Further suggestions for 5 key upcoming Farm to Fork policies?
- J.** Final remarks

**Please note, there are no mandatory questions.** If a certain topic is of no particular relevance to your organisation, you can leave it open. No answer will be interpreted as an implicit approval of a proposed way forward.

**Your answers will be saved before submitting, so you do not have to complete the survey in one go.**

You can also **download the questions** here.

## A. Which front-of-pack nutrition labelling scheme?

At the end of 2022, the Commission will come forward with a proposal for a harmonised, mandatory front-of-pack nutrition labelling (FOPNL) scheme. While the proposal is still some time away, the debate about different options - such as Nutriscore, traffic-light, Nutrinform - is already very heated.

Having a well-defined FOPNL system is a component of a healthier food environment, and EPHA has positioned itself in favour of FOPNL on previous occasions. However, to play a role in the current policy debate our position needs to become more specific. This is especially relevant considering the 'outsized' role this file will likely play in the overall food and health policy debate.

### 4. Does your organisation have a position on front-of-pack nutrition labelling (FOPNL)?

- Yes (please add a link to this position in the comment box below)
- No, but we are working on one / are considering to elaborate one
- No, we will unlikely have a position
- Other

Comment: if yes - please provide a link to your position; if other - please explain.

- **The European Heart Network (EHN) has recently published a paper discussing the pros and cons of different FOPNL schemes accompanied with its position** ([see here](#)). In brief, EHN provides conditional support for Nutriscore, if (and only if) its algorithm is adapted to reflect national food-based dietary guidelines. A scientific committee of independent experts should be established to review and adapt the algorithm.

### 5. Which position should EPHA adopt?

- A position that provides conditional support for Nutriscore if certain further conditions are fulfilled (similar approach as EHN).
- A position that provides (conditional) support for another current FOPNL system.
- A position that highlights what conditions a FOPNL needs to fulfill, without yet highlighting a specific system.
- Other approach (please explain below)

Comment:

- **The WHO has published (draft) Guiding principles for front-of-pack labelling schemes** ([see here](#)).

Based on these WHO principles and other considerations, EPHA proposes a shortlist of the following key features that an EU FOPNL scheme should fulfill (this is complementary to any position adopted under the previous question).

6. Please mark the conditions you agree with that should be part of EPHA's approach to FOPNL (multiple answers possible).

- The system should be mandatory across the EU
- The system should be interpretive, based on symbols, colours, words and/or quantifiable elements (WHO)
- The system must be colour-coded (further specification of previous point)
- The system should enable appropriate comparisons both between food categories and within a food category (WHO)
- The system should be accompanied by a monitoring and review process (WHO)
- The system should be aligned with healthy dietary guidelines and policies (WHO)
- The system should be sensitive to whole grains
- The system should be designed to recognise ultra-processed foods as a health-relevant category (see below)
- The system should be fine-tuned by independent experts
- Any new system to be considered for adoption, should be tested against other options in a collaborative approach, led by governments / independent experts
- Other

Comment: if other - please specify; or additional comments:

## B. 'Ultra-processed food': a new food-health category?

There is strong emerging evidence that 'ultra-processed' foods (UPFs) pose a significant risk to health. Their consumption has, among others, been widely associated with obesity, different non-communicable diseases (NCDs), including cardiovascular diseases, type-2 diabetes and several cancers, with gastrointestinal disorders and depression.

Ultra-processed foods often overlap with foods high in fat, sugar and salt (HFSS), which is the 'traditional' unhealthy food category. However, there is increasing evidence that not only nutritional composition, but the level and type of processing *in itself* is health-relevant too.

A recent [review](#) concluded that: "*There is now a considerable body of evidence supporting the use of UPFs as a scientific concept to assess the 'healthiness' of foods within the context of dietary patterns and to help inform the development of dietary guidelines and nutrition policy actions.*"

[See here](#) for a short EPHA briefing on ultra-processed foods.

The draft conclusion of this briefing is that "*despite perspectives to the contrary, there is a strong body of evidence associating UPFs with a variety of health issues*" and that "*the question of UPFs needs to be urgently addressed*".

Four main steps are proposed:

1. Find an evidence-informed agreement about whether to address UPFs as a separate food-health category.
2. Launch tender(s) to gain specific additional evidence in case of need.
3. Find agreement on an evidence-informed method to classify UPFs.
4. Consider ways to integrate concerns around UPFs into relevant European food policies.

### 7. Do you agree for EPHA to highlight the urgency of addressing the question of 'ultra-processed foods' in line with these 4 steps?

- Yes
- No
- Other

Comment:

**- Based on the above discussion of 'ultra-processed foods', please consider EPHA's proposals for three practical policy approaches (Q7-9).**

8. Consider integrating ultra-processed foods into front-of-pack labelling.

EPHA proposes to raise debate about whether the category of 'ultra-processed food' should be integrated into any algorithm for a front-of-pack nutrition labelling (FOPNL) scheme. If ultra-processed products are a health-relevant category, it would be a legitimate expectation to see this reflected in FOPNL.

Do you generally agree with this approach?

- Yes
- No
- Other

Comment:

9. Exclude ultra-processed foods from marketing to children.

The WHO Europe Nutrient profile model, designed to determine which foods can and which cannot be marketed to children - and which is considered to be the strongest available profile - does not entirely prohibit the marketing of ultra-processed products as such.

The gap in the nutrient profile is especially significant when it comes to meat products. There is a good case to be made that products such as hot dogs, chicken nuggets, burgers, salami pizzas etc., all considered to be ultra-processed food, should per definition be excluded from marketing.

EPHA proposes to bring forward the point that in efforts to regulate children's exposure to unhealthy food marketing, the nutrient profile model used should per definition exclude ultra-processed products. This next to having per-nutrient limits for other foods.

Do you generally agree with this approach?

- Yes
- No
- Other

Comment:



#### 10. Plant-based meat substitutes.

Meat and dairy substitutes are on the rise. In most cases these are ultra-processed food products that carry the (probable) health risks that accompany this food category.

At the same time, we are faced with an urgent need to transition towards less meat-heavy diets in Europe. This poses a dilemma.

As a middle way between rejecting and embracing such products, EPHA proposes to:

- acknowledge that meat substitutes have a role to play in a transition towards less meat-heavy diets, especially when replacing ultra-processed meats;
- highlight that efforts need to be made to improve the nutritional profiles of such products, including salt levels and micro-nutrient composition;
- not to embrace or promote this category of products;
- to emphasise the benefits of plant-based whole foods over meat substitutes as part of a transition towards healthier more plant-rich diets.

Do you generally agree with this approach?

- Yes
- No
- Other

Comment:

### C. A food systems approach to food and health?

Food systems encompass a wide range of elements and activities related to the production, processing, distribution, marketing, preparation and consumption of food. Consequently, food systems shape multiple health determinants.

Of these, nutrition and food safety are the most direct and significant health links, but not the only ones. Other links include air quality, antimicrobial resistance, climate change, zoonotic diseases, exposure to agrochemicals, social determinants and threats related to land expansion and biodiversity loss.

The policy links between food and health can be defined either more narrowly or more broadly:

- A more narrow approach focuses on the direct links between food products and health (nutrition, food safety).
- A broader approach also includes the health impacts arising through production systems. Such 'food systems approach' encompasses 'planetary health' and 'one health' dimensions, allowing to make health, for instance, more relevant to aspects of the EU Green Deal and to better reflect public health as a discipline.

EPHA has, as part of its work on the Common Agricultural Policy, proposed a comprehensive framing of the links between food and health, while maintaining its primary focus on health nutrition.

11. Should EPHA continue to frame and refine the links between food and health from a 'food systems' perspective, with a primary focus on nutrition, but also encompassing wider concepts of 'planetary health' and 'one health'?

- Yes
- No
- Other

Comment:

12. Does your organisation have explicit positions that relate to the health impacts of food production? (this can include any aspects related to agriculture, incl. pesticides use, air quality, antibiotics use etc.)

- Yes (please share the main themes of attention and/or links to position below)
- No
- Other

Comment:

#### D. From diets to food environments?

'Food environment' is a public health concept that is now increasingly used in food policy debates. In a recent report, the EU's chief scientific advisors call to implement regulatory and fiscal policies to change food environments, rather than rely on consumer choice. The term has also been incorporated into the Farm to Fork strategy.

The importance of this shift cannot be overstated. Creating healthy food environments is about ensuring that healthy food choices become the default, most attractive and affordable ones, empowering changes in eating patterns. This is the opposite of the age-old industry narrative focused on putting the burden of dietary change on individuals.

To further emphasise the need for a reframing of food policy, EPHA proposes to shift, where justified, away from speaking about 'diets' - a term that too easily refers back to individuals, towards speaking about 'food environments' - the structural contexts in which choices are made.

This involves:

- Stating explicitly that the aim of food policy is to change 'food environments', not to change diets.
- Making explicit that 'healthy diets' are the expected outcomes of healthy food environments.
- Making sure to avoid terminology like 'lifestyles', which tends to individualise the issue.

#### 13. Do you agree for EPHA to pursue such narrative approach?

- Yes
- No
- Other

Comment:

## E. Which obesity and NCD prevention policies to prioritise?

Creating healthy food environments requires a range of policies to be implemented in line with the [WHO Best Buys](#). At the same time, and without abandoning this comprehensive approach, it is helpful to focus attention on a number of promising policy levers.

In this light, it is also well-recognised that a credible European policy narrative should point to how the EU should engage with actions at different governance levels.

EPHA proposes to prioritise the following four policy levers, each at a different level of governance:

- **Global:** Stress the EU's role in negotiating **trade** deals and setting trade policies.
- **EU internal market:** Stress the imperative and competence to ensure EU-wide legislative action to minimise the exposure of children to the **marketing** of unhealthy food, based on a [child rights](#) approach. (Note that EPHA together with members, partners and scientific advisors is currently working on a draft Directive on this topic).
- **National level:** Stress the added value of supporting national governments with developing, implementing and evaluating **fiscal policies**, including both taxation and subsidies.
- **Local level:** Point to the added value of creating enabling conditions for the uptake of healthy and sustainable **public food procurement** policies by local authorities.

14. Do you agree for EPHA to prioritise these four policy levers for the creation of healthy food environments to prevent obesity and diet-related NCDs?

- Yes
- No
- Other

Comment:

## F. Towards 'less and better' meat, dairy and eggs?

Numerous studies have shown an association between high red and processed meat consumption and a variety of health risks. Standard dietary advice is to 'moderate' meat consumption, especially of red and processed meat. The Farm to Fork Strategy recognises that the "*average intakes of energy, red meat, sugars, salt and fats continue to exceed recommendations*" and the "*consumption of whole-grain cereals, fruit and vegetables, legumes and nuts is insufficient*".

Likewise, multiple studies, most prominently the EAT-Lancet Commission, have shown the potential for significant health, environmental and economic co-benefits of moving towards more plant-rich diets, with on average less meat, dairy and eggs (for high consuming countries).

EPHA over the years has consistently promoted policies to support a transition towards healthier, more diverse, plant-rich diets with lots of fruit and vegetables, whole grains, pulses, nuts, seeds and herbs, and with 'less and better' animal products.

EPHA proposes a public health vision for its advocacy that seeks to fine-tune a 'less and better' approach to farm animal products, which is based on two equal pillars involving the consumption and production dimensions:

1. Create food environments that enable and drive a transition towards eating patterns with **less** meat (all types, not just red meat), dairy and eggs, while being sensitive to different nutritional needs at various stages of life (e.g. childhood, pregnancy etc.).
2. Promote **better** production systems that have the potential to minimise antibiotics use, increase animal welfare, improve biodiversity, reduce climate impacts, minimise arable land use and improve added value for farmers. Such systems include organic agriculture and methods inspired by agro-ecological approaches, agroforestry, organic, circular and regenerative methods. The potential co-benefits of such systems can only materialise under lower animal production scenarios.

### 15. As part of your organisation's approach to healthy diets, do you explicitly support a reduction in meat and/or other animal product consumption?

- Yes (please explain how you formulate this approach/recommendation)
- No (please explain why not)
- Other

Comment:

### 16. If 'yes' to the previous question: does your position distinguish between different animal production methods?

- Yes (please explain how you formulate this approach/recommendation)
- No
- Other

Comment:

17. Do you agree for EPHA to base its approach to farm animal products on such a 'less and better' vision?

- Yes
- No
- Other

Comment:

**- What to do with meat taxation?**

Taxation has proven to be a very effective health measure across tobacco, alcohol and food. Different forms of meat taxation have been proposed and are being discussed at a policy level in Germany and the Netherlands.

While there is undoubtedly a need to move away from meat-heavy eating patterns in Europe, meat taxation raises a variety of issues, especially related to the potential impacts on people exposed to socio-economic vulnerabilities and potential unwanted consequences on producers (e.g. pricing small-scale and/or more sustainable producers out of the market).

EPHA has been asked for its position on this topic, which will most likely intensify in the coming period. In this light, EPHA proposes to remain open to the idea of fiscal measures to increase the price of meat, but to call for more evidence before advocating for any particular course of action. More evidence would especially be required on:

- The subject of taxation: at which different points in the food supply chain could levies be imposed, and which types of products are best targeted and for which characteristics;
- The upstream and downstream effects of different forms of taxation, especially for vulnerable consumers, small-scale producers and more sustainable production systems;
- The possibilities to earmark funds from levies to compensate for any potential unwanted effects;
- That such evidence should be produced through modelling studies and/or policy evaluations in countries that have gone forward to implement such levies.

18. Do you agree for EPHA to actively call for more evidence about different forms and effects of meat taxation?

- Yes
- No
- Other

Comment:

**- Aquatic foods and 'alternative' proteins**

At EU level, the policy debate about food and agriculture is increasingly integrated, but the debate about fisheries and aquaculture is largely conducted in a separate 'bubble'. From both a health and a food systems perspective, such separation is not justified. The health benefits from fish and other aquatic products is widely recognised, but both fisheries and aquaculture pose vast sustainability and global health and equity challenges.

At the same time, initiatives for the production of 'alternative proteins', including algae, insects and proteins that are totally disconnected from agriculture or fisheries, like lab-grown meat and other novel processes, are mushrooming.

19. Does your organisation have a specific position about the role of aquatic products in a healthy and sustainable diet?

- Yes (please explain below and/or provide a link to this position)
- No
- Other

Comment:

20. Does your organisation have a specific position about the role of 'alternative proteins' in a healthy and sustainable diet?

- Yes (please explain below and/or provide a link to this position)
- No
- Other

Comment:

**- Omnivore, flexitarian, pescatarian, vegetarian, vegan: all (potentially) compatible with nutritionally healthy diets?**

There is a large variety in general dietary patterns, mainly distinguished by different approaches to animal-based products. There appears to be an increasing consensus that, if sensitive to different needs at different stages of life, most of these headline diets could, in principle, be compatible with nutritional health. Diets that fully exclude animal products may need more careful planning and supplementation.

21. Does your organisation have a specific position about the nutritional/health adequacy of different types of diets?

- Yes (please explain below and/or provide a link to this position)
- No
- Other

Comment:

## G. How to align food systems transition with a social justice agenda?

Social determinants, or the conditions in which people are born, grow, live, work and age, permeate every aspect of public health. People exposed to socio-economic vulnerabilities are disproportionately burdened by ill-health, including diet-related and wider food system-related ill-health.

While food systems transition is expected to produce large scale co-benefits, steps forward are often hampered by arguments (fairly or not) that these could have negative consequences for lower socio-economic groups. Food insecurity is a reality in Europe - around 12% of the EU population is unable to afford a quality meal every second day, and this has probably increased in the COVID era.

Inequalities pose a significant challenge for food systems and food systems transition. There are a few lines of arguments that EPHA has used to align food system reform with a social justice agenda, but further work seems to be needed:

- There is good evidence that many public health, population-based NCD prevention policies, such as unhealthy food taxation, can improve health equity.
- Health policies often promote healthy nutrition schemes and subsidies targeted at lower socio-economic groups.
- While it is unacceptable to envision a food systems transition that will push people into precarious situations, food policy is not the instrument to solve poverty and social exclusion. This is where social and economic policies come into play.

## 22. How does your organisation address and communicate about the relationship between healthy food policies and social determinants?





#### H. What place for alcohol in the food policy debates?

In health terms, alcohol is a harmful, psychoactive 'substance'. In EU law, it is classified as a 'food'. Alcoholic drinks are therefore part and parcel of many food policies, but alcohol reduction measures are usually not included into narratives about 'healthier food systems'.

Over the last period, EPHA has addressed alcohol as part of wider policy files, such as the [CAP](#), [agricultural promotion policy](#), [marketing](#) and also in the context of its work on [NCD prevention](#).

23. In your opinion, should alcohol be more prominently included into the 'healthy food policy' narrative, or should alcohol not be associated to the food policy debate so as not to undermine its status as a 'harmful substance'?

24. What opportunities do you see for EPHA's further engagement and added value on this topic?



## I. Further suggestions for 5 key upcoming Farm to Fork policies?

In the next months and years, a range of actions will be initiated under the [Farm to Fork strategy](#). Below, a selection of five policy actions is presented that are particularly relevant to health.

While some of these actions are still some time away, the earlier we can put down key asks, the more chance to influence the discussion.

### 1) Voluntary Code of Conduct for responsible business and marketing practices

In early 2021 the Commission will come forward with a voluntary code of conduct for business actors in the food supply chain, which will function on the basis of voluntary commitments. While not welcoming such voluntary approach, EPHA proposes to make the best of it by making sure commitments are meaningful and precise enough to be easily monitored.

EPHA considers proposing a following set of specific commitments:

- End to unhealthy food at check-out counters in retail settings.
- End to in-store promotions of unhealthy foods, esp. attractive to children.
- End to brand equity characters on unhealthy foods.
- End to meat promotion, especially in retail advertising.
- End to in-store promotion of alcoholic drinks.
- Structural separation of alcoholic drinks in retail settings.

25. Do you agree with these proposals, and which other specific industry commitments could be proposed?

### 2) Mandatory criteria for public food procurement

In mid-2021 the Commission will consider ways to introduce mandatory food procurement criteria across the EU to promote healthy and sustainable diets.

EPHA has made a case for this in a joint [discussion paper](#) from 2019.

26. Do you have examples of specific health criteria that can be introduced in public food procurement settings and made mandatory across the EU?

### 3) Reformulation of processed food

Towards the end of 2021 the Commission will launch initiatives to stimulate the reformulation of processed foods, including the setting of maximum levels for certain nutrients.

27. Do you have suggestions about which foods should be reformulated as a priority; what are the success factors for effective reformulation initiatives; and which foods (e.g. infant foods) should become subject to mandatory nutrient levels?

**4) Nutrient profiles for health and nutrition claims.**

Towards the end of 2022 the Commission will set nutrient profiles to prevent unhealthy foods from bearing health and nutrition claims.

28. Do you have suggestions for a nutrient profile that could serve as a baseline for the Commission proposal, or key conditions that should be met by an EU nutrient profile?

**5) Legislative framework for sustainable food systems**

In 2023 the Commission will propose a regulatory framework for sustainable food systems, which will set principles and definitions, and provide a guiding framework for food policy-making both at EU and national levels.

An initial EPHA suggestion is that the structure of this legislative framework should be inspired by UN Framework Conventions, such as the one Tobacco control and Climate change.

29. Do you have suggestions about the key issues that an EU legislative framework for sustainable food systems should address?

**J. Final remarks**

30. How would you rate the overall clarity and usefulness of this survey? (1 = least satisfactory, 5 = most satisfactory)



Please explain why (optional):

31. Any other topics you would like to raise? Or additional thoughts, input, concerns? Please share here:

**THANK YOU FOR YOUR PARTICIPATION!**

Please contact [nikolai@epha.org](mailto:nikolai@epha.org) should you have any questions

\*\*\*

The European Public Health Alliance has received funding under an operating grant from the European Union's Health Programme (2014-2020). The content of this survey represents the views of the author only and is his/her sole responsibility; it cannot be considered to reflect the views of the European Commission and/or the Consumers, Health, Agriculture and Food Executive Agency or any other body of the European Union. The European Commission and the Agency do not accept any responsibility for use that may be made of the information it contains.