

## **Farm to Fork strategy: contribution to the Code for responsible business conduct**

11 January 2021

The European Public Health Alliance (EPHA) is pleased to submit the following suggestions to the design of the “EU code and monitoring framework for responsible business and marketing conduct in the food supply chain” (the Code) to be launched under the Farm to Fork Strategy.

### **Code of Conduct: potentially useful part of the policy mix**

EPHA believes that the Code, if well-designed, can contribute to the aims of the Farm to Fork strategy. However, this only in as far as the Code is explicitly conceived as complementing, rather than competing with, regulatory activity. Checks should be put in place to prevent the initiative from crowding-out regulatory approaches in areas where mandatory standards are more effective.

This position is fully aligned with the opinion of the Group of Chief Scientific Advisors to the European Union (EU), which holds that: “*Voluntary initiatives (...) can be very helpful. However, evidence shows they must not be relied upon as the sole or main drivers of change as an alternative to binding measures.*”<sup>1</sup>

### **Learning from evidence and past initiatives**

Drawing on experience with the EU Platform for Action on Diet, Physical Activity and Health and on existing evidence regarding the functioning of voluntary commitment initiatives, EPHA would like to emphasise the importance of the following design features:

- **Focus on core business.** Commitments should focus on the core business of the entities involved. Considering that the essential activities of targeted industries are centred on making food available to consumers, commitments must include nutrition objectives.

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<sup>1</sup> Group of Chief Scientific Advisors (2020) [Scientific opinion – Sustainable food system](#). European Commission



While food systems produce vast environmental (health) impacts that urgently need to be addressed, an exclusive focus on the environmental aspects of supply chains would not result in a balanced approach towards sustainability.

Core business furthermore presupposes that commitments focus on changing ‘food environments’, rather than inducing ‘lifestyle’ changes. None of the entities involved are educational establishments or tasked with creating and communicating dietary guidelines. Therefore, informing people about behaviours is not a core activity for any of the actors involved.

- **Commitments should be additional, unambiguous, easily verifiable and, ideally, be based on evidence.** Academic evaluations of voluntary commitment often find serious design flaws in such initiatives, including that commitments are often not designed to maximise health impact.<sup>2</sup>

To ensure the credibility and added value of this initiative it will be important at least to ensure commitments are:

- **Additional** – while many businesses are making steps forward towards more healthy, sustainable operating models, sometimes in direct response to public demand, the Code should clearly show its additionality to what is going on already. In other words, the Code should not be a collection of existing activities.
- **Unambiguous** – academic evaluations often describe the vagueness of many voluntary commitments, making it difficult to evaluate their societal contribution. Care should be applied that commitments under this Code are framed in an unambiguous way, so that the value of contributions can be understood.
- **Easily verifiable** – commitments that are easily verifiable will facilitate the task of monitoring and evaluation.
- **Based on evidence** – where evidence exists about the effectiveness of certain approaches, for instance as in the case of checkout policies,<sup>3 4</sup> such initiatives should be prioritised.

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<sup>2</sup> See for instance: Knai et al. (2015) [Has a public-private partnership resulted in action on healthier diets in England? An analysis of the Public Health Responsibility Deal food pledges](#). *Food Policy*

<sup>3</sup> Brimblecombe et al. (2020) [Effect of restricted retail merchandising of discretionary food and beverages on population diet: a pragmatic randomised controlled trial](#). *The Lancet*

<sup>4</sup> Ejlerskov et al. (2018) [Supermarket policies on less-healthy food at checkouts: Natural experimental evaluation using interrupted time series analyses of purchases](#). *PLOS Medicine*





- **Need for a robust monitoring system.** The ability to show clear and trustworthy results will be key for the credibility of the Code. Therefore, the monitoring system should focus on evaluating both the progress made towards achieving commitments, and the societal impacts of commitments.

Especially for the latter, independent evaluation will be required. It is doubtful whether such evaluation, however, should be financed by public resources. A system where commitment holders contribute to an independently managed fund that will tender out evaluations could be imagined instead. This may also lead to a ‘quality over quantity’ approach towards the commitments submitted.

#### **Examples of such commitments for retailers would include:**

- Remove foods high in fat, sugar and salt (HFSS) from check-out counters in retail settings.
- End in-store promotions of HFSS foods, especially those attractive to children.
- End price promotions for meat and meat products, including in retail advertising.
- End multi-buy (e.g. buy-one-get-one-free) and other price promotions for HFSS foods.

More complex commitments covering food service, retail and processing, inspired by the ‘Better by Half’ Roadmap proposed by the Eating Better alliance, can also be considered.<sup>5</sup> More interpretative commitments, such as those focused on improving menus, plates, shopping baskets, making healthier, more sustainable items more appealing etc. would need to be well-defined to allow monitoring and evaluation.

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<sup>5</sup> Eating Better. [Better by half roadmap](#)

