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Why Europe needs a health-oriented food policy

EPHA position paper on the EU Farm to Fork Strategy



The **European Public Health Alliance (EPHA)** is a change agent, a leading European civil society alliance in Brussels, made up of public health NGOs, patient groups, health professionals and disease groups, working to improve health and strengthen the voice of public health in Europe.

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I. Introduction: Europe in crisis needs a health-oriented food policy

Europe needs to double down on its ambitions to transform the food system. A public health vision can lead the way.

Two years ago, in May 2020, the “Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system”¹ was launched as part of the European Green Deal.² It represents the most coherent and comprehensive European attempt yet to respond to the **fundamental challenges posed by today’s food systems**.

In this brief period, Europe’s sustainable food agenda has faced two **deep crises**, in the COVID-19 pandemic and the war in Ukraine. We have also experienced the effects of accelerating climate change, from deadly floods to unprecedented forest fires. In addition, Europe continues to be burdened by high levels of obesity and other diet-related diseases, as well as rising antimicrobial resistance and growing health inequalities.

Recognising the **urgency for a transition to sustainable food systems**, European civil society and other public interest organisations have shown consistent support and constructive engagement with the Farm to Fork Strategy’s agenda.^{3 4 5 6 7 8 9 10} This in contrast to sustained opposition from a number of vested interests.

Today, with Europe in turmoil, there are calls to abandon the Farm to Fork Strategy. But instead of lowering its ambitions, what is needed now is an even stronger commitment to sustainability, accompanied by a paradigm shift towards a **health-oriented food system that puts the health of people, planet, and animals at its core**.¹¹

A health-oriented approach to food systems change can **bring many significant benefits**:

- A food system designed around **healthy eating** can achieve food security within planetary boundaries and a more effective use of land;
- A food system based on **health equity** will ensure dignity and well-being for consumers, producers and workers alike;
- A food system that recognises that human health and well-being is dependent on the **health of the planet** will prioritise tackling the climate and biodiversity emergencies;
- A food system focused on the **health and welfare of animals** will support a transition to sustainable animal farming with its many societal co-benefits;
- A food system that strives to fulfil people’s **right to food and health** can contribute to a people-centred society that puts the public interest before commercial imperatives.

This position paper sets out why the Farm to Fork Strategy is a key initiative and where it should be further strengthened for it to succeed in advancing a **health-oriented, sustainable food system**, which is so urgently needed today.

The paper draws on the contributions of EPHA, its members and partners to different parts of the strategy and will especially reflect on how the upcoming **Legislative framework for sustainable food systems** can be a game-changer for people’s health.

II. Food systems change is a public health priority

The current European food system generates profound risks for human health, many of which can be reduced or avoided. There is therefore an urgent need to change food systems both for European and global health.

The Farm to Fork Strategy rightly aims to address in a “comprehensive way” the sustainability of food systems, recognising the **“inextricable links between healthy people, healthy societies and a healthy planet”**.

The **links between food and people’s health run deep and wide**. Nutritious, safe food in adequate quantities is a basic human need – and a human right¹² – and eating well is a key building block of healthy and flourishing lives. At the same time, other factors also define the relationship between food, food systems and health. How food in Europe is produced, processed, marketed, consumed and re-utilised has major repercussions – both positive and negative – for a wide range of health determinants and risk factors, both in Europe and across the globe.

Dependent on how food systems operate and perform, their **health impacts** can manifest as either **positive** – for instance in reduced disease burdens, longer years lived in good health (i.e. increased healthy life expectancy) and improved social well-being, or **negative** – especially as non-communicable diseases (NCDs), communicable diseases, injuries and premature mortality.

Despite important achievements in food safety and availability, the **European food system is not sustainable**, endangering our health, climate, nature, economy, and social fabric.^{13 14} Five impact pathways have been proposed to describe how food systems can negatively impact human health. These include occupational hazards; environmental contamination; contaminated, unsafe, and altered foods; unhealthy dietary patterns; and food insecurity.^{15 16}

As further described in the **Annex below**, today’s food system is driving diet-related diseases, is a major contributor to the climate emergency, plays an important role in the growing threat of antimicrobial resistance (AMR), significantly contributes to air pollution and the emergence and spread of infectious diseases, is an important source of exposure to dangerous chemicals, and is often associated with occupational hazards and socio-economic inequalities.

The **European food system can and must be decisively transformed to become a cornerstone of a healthy, prosperous, and sustainable future** – which it has all the potential to be.¹⁷ This requires good quality policy making, based on sound analysis. Such analysis must ensure that all relevant dimensions and impacts linking public health and food systems are captured and considered.

The avoidable burden of NCDs

When societal and ecological systems malfunction, people pay the price with their health and well-being. Public budgets and health systems also suffer, having to divert resources to deal with the consequences of often preventable emergencies, rather than making much-needed investments into building a sustainable and prosperous future.

Non-communicable diseases (NCDs) are a prominent example of this situation. NCDs, such as cardiovascular diseases, cancers, diabetes, chronic respiratory diseases, liver diseases, as well as mental ill-health – and as increasingly recognised, obesity – are the major health issues of the 21st century.¹⁸ NCDs represent over 90% of all deaths and 85% of the entire burden of diseases in the EU.¹⁹ They account for the premature death of more than 550,000 people aged between 25 and 64 each year. Premature mortality from NCDs alone results in a loss of €115 billion annually to the economy.²⁰ Each year, around €700 billion from healthcare budgets is spent on treating NCDs.

Many NCDs are to a significant degree preventable. The food system has a wide-ranging and modifiable impact on the burden of NCDs, including through its contribution to climate change, air pollution, occupational risks, and exposure to dangerous chemicals.

Unhealthy diet is a leading risk factor for the incidence of NCDs. For instance, dietary risks are responsible for approximately half the burden of cardiovascular disease, Europe's main cause of premature mortality, costing the EU economy over €102 billion a year.²¹ **Overweight and obesity** have reached epidemic proportions in Europe, affecting almost 60% of adults and nearly one in three children. No country is on track to halt their rise.²² The effects of overweight and obesity on life expectancy, health expenditure and the labour market have been estimated to cut GDP by 3.3% in OECD countries.²³

Recommendation

1. The European Commission should **improve impact assessment methodologies and practices** applied to food-related European legislative processes, to ensure all relevant dimensions linking food systems and health are captured and considered. This is especially important to ensure a well-balanced proposal for the upcoming Legislative framework for sustainable food systems.

Better health impact assessment means to:

- Apply impact assessment methodologies that systematically account for all relevant determinants of health and integrate the **One Health**²⁴ and **Planetary Health**²⁵ conceptual frameworks;
- Take a health equity lens by analysing the impact of proposed policy measures on different population groups with the aim of designing policies that reduce social inequalities;
- Analyse the health costs of non-action, including for global health and health equity;
- Factor in how changes in food consumption can support the achievement of other food system sustainability objectives.

III. The co-benefits of sustainable healthy diets

A shift in food consumption patterns is unavoidable to secure a sustainable and prosperous future. Europe should transition at population-level to healthy, more plant-rich diets higher in fruits, vegetables, whole grains, pulses, seeds, berries, and nuts, and lower in calories, processed foods high in fats, sugars, and salt, and with ‘less and better’ animal products.

The Farm to Fork Strategy recognises that **food consumption patterns in Europe are unsustainable** and argues for a move to a “more plant-based diet with less red and processed meat and with more fruits and vegetables”.

A large body of evidence confirms that a **transition to sustainable healthy diets can deliver essential**

societal co-benefits. Such benefits include improved nutrition and reduced diet-related diseases, lower health-related societal costs, climate mitigation, increased land availability, the conservation of forests and biodiversity, lower antibiotics use, and lower consumer spending.^{26 27}

28 29 30 31 32 33 34 35

A **healthy diet** is “of adequate quantity and quality to achieve optimal growth and development of all individuals and support functioning and physical, mental and social well-being at all life stages and physiological needs. Healthy diets are safe, diverse, balanced, and based on nutritious foods.”²⁰⁰

Healthy diets protect against malnutrition in all its forms. The building blocks of a healthy diet are described in the World Health Organization (WHO) Healthy diet fact sheet.²⁰¹

Sustainable diets are those diets “with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations”.^{202 203}

Sustainability in relation to food systems involves at least the following six dimensions: health; ecological; economic; social; ethical; and resilience.²⁰⁴

A **sustainable food system** for the EU could be described as one that: “provides and promotes safe, nutritious, and healthy food of low environmental impact for all current and future EU citizens in a manner that itself also protects and restores the natural environment and its ecosystem services, is robust and resilient, economically dynamic, just, and fair, and socially acceptable and inclusive. It does so without compromising the availability of nutritious and healthy food for people living outside the EU, nor impairing their natural environment.”²⁰⁵

Co-benefits are the additional benefits of tackling multiple societal issues at the same time.²⁰⁶ Designing policies for co-benefits is about conceptualising measures that maximise benefits across as many food systems dimensions as possible, while minimising trade-offs.

While recognising the need for dietary change, the Farm to Fork Strategy however **leaves several key aspects of this transition under-articulated**. This has important consequences for the way problems and solutions are framed. Two gaps especially stand out:

1. **A new social contract on the production and consumption of animal foods**

The way animal foods, including seafood, are produced and consumed in Europe play a **disproportionate role in the sustainability challenges linked to the current food system**. Current animal production is a major factor in driving climate change, global biodiversity loss, zoonotic diseases, antibiotics overuse, occupational risks in the food sector, and air pollution. High consumption of red, and especially processed meat, contributes to dietary risks.³⁶

To tackle these challenges and to **maximise the positive contribution animal food production and consumption can bring**, including for nutrition and agronomic systems, a **'less and better'** vision on animal foods is gaining ground.³⁷ This approach rests on two inseparable pillars: one being 'less' animal source food consumption and production compared to current levels, the other being 'better' production methods, implying benefits for producers, climate, environment, health, and animal welfare. These two pillars are not only inseparable; they are also interdependent. Better production – away from high-density, industrial animal farming systems – can, in a sustainable system, only be achieved with fewer farm animals.³⁸

Transitioning animal farming systems is urgent and deserves priority attention. Given the important role animal foods play in Europe's food system it is also fraught with challenges. A **comprehensive approach is needed to forge a new social contract** on the production and consumption of animal foods in Europe, based on a 'less and better' scenario.

This requires a strategy that:

- Defines and integrates 'less and better' into the design and implementation of all relevant public policies;
- Instils confidence with producers, workers, and consumers that the socio-economic, occupational, cultural, and power-related challenges involved are adequately and fairly handled, while ensuring meaningful participation in the transition;
- Tackles in earnest the climate and biodiversity impacts of the current system;
- Seizes the opportunities of linking improvements in animal welfare to reducing the need for antibiotic use;³⁹
- Ensures that nutritionally rich animal foods are available for population groups that might need them most and that animal foods are not replaced by nutritionally poor substitutes.^{40 41}

2. **The role of nutritionally poor foods and commercial determinants in driving unsustainable food systems**

The Farm to Fork Strategy correctly points to the need to reduce the intake of sugars, salt, and fats in the diet. It is, however, much less articulate about the **foods responsible for today's excessive intakes**. While the quality of diets is what ultimately matters, the foods that constitute diets are also critical. Diet-related diseases, including the shocking global rise in overweight and obesity, have been overwhelmingly linked to the overconsumption of processed **foods high in fats, sugars, and salt (HFSS)**,^{42 43} or otherwise energy-dense, nutrient-poor foods.⁴⁴

In addition, an active scientific and societal debate is taking place about **food processing and its relation to health**.⁴⁵ While food processing is a multifaceted activity, the debate is fuelled by emerging evidence about how the structure of

food, including texture and matrix, and the ease and speed with which food is consumed, may influence health-relevant indicators, such as energy intake and metabolism.^{46 47} As part of this, the concept of **‘ultra-processed foods’ (UPFs)** has risen to prominence. UPF is an emerging term used to categorise foods according to levels and types of processing, alongside nutritional composition.⁴⁸ Despite challenges with accurately categorising UPFs,^{49 50 51} a mounting body of evidence finds that the share of such foods in people’s diets has expanded throughout Europe and much of the world,^{52 53 54} and that increased consumption is linked with adverse health outcomes.^{55 56 57 58 59 60 61} While questions remain,⁶² should evidence on the health impacts of different forms of food processing solidify, this could have important repercussions for food policy.

Next to the dietary impacts of specific categories of processed food products, the strategy also omits to reflect on the **environmental sustainability and land use implications** related to the manufacturing and marketing of foods associated with ill-health.^{63 64} Using land, an increasingly limited and vital resource, to produce ingredients for foods that harm people’s health cannot be a sustainable strategy and must

be questioned. The same applies to ingredients for alcoholic beverages, with alcohol use being another major driver of Europe’s burden of disease and premature mortality.⁶⁵

HFSS foods tend to be mass-produced and mass-marketed. Significant commercial interests are vested in these foods, which are ubiquitous because of well-calibrated business models. The term **‘commercial determinants of health’** is used to describe how private sector activities affect people’s health, either positively or negatively.⁶⁶ In the adverse case, food businesses, through marketing and their supply chains, promote products and food choices that are detrimental to health. They also use lobbying and public relations strategies to undermine effective health policies.⁶⁷

A critical step towards a real debate about the place of nutritionally poor foods in a sustainable food future and towards finding solutions in the public interest is to recognise the role of such commercial determinants. The next is to find ways to ensure that, while being consulted, **food businesses are prevented from setting the tone and direction of public policy.**

Recommendations

1. The EU* and national governments should forge a **new social contract on the production and consumption of animal foods, including seafood, based on a 'less and better' approach**. This includes mainstreaming a transition towards healthy, more plant-rich diets with 'less and better' animal food consumption and production into all relevant European and national public policies. It also requires a special focus on solving the socio-economic challenges that may arise in such a transition for producers, food workers and consumers, while maximising the benefits for climate and biodiversity.
2. The European Commission should prioritise **independent research** to answer open questions about the potential health impacts of different types of food processing, especially with a view on policy development.
3. National governments should update their dietary guidelines to include other sustainability dimensions beyond nutrition. The European Commission should facilitate the move towards national **sustainable healthy dietary guidelines**, which should include dedicated guidelines for population groups with special nutritional needs and specific guidelines for different dietary patterns.

Based on existing examples,⁶⁸ the European Commission should facilitate the process of drawing-up a European guideline for sustainable healthy diets, to support coherent food policy making.

4. The European Commission should reconsider its policy consultation mechanisms and introduce governance mechanisms to prevent food system actors with **conflicts of interest** from contributing to setting the public policy agenda.
5. The European Commission should host an **effective coordination mechanism** for national public authorities and other public interest actors to improve exchange and alignment on healthy food policies across Europe.

* 'The EU' refers to the European Commission, European Parliament and European Council each in their relevant legislative and policy capacities

IV. Changing diets means changing ‘food environments’

Unhealthy, unsustainable diets are a normal response to today’s food environments which “exploit people’s biological, psychological, social, and economic vulnerabilities, making it easier for them to eat unhealthy foods.”²⁰⁷ The most effective and equitable way to shift consumption patterns is to change food environments, the structural factors that drive food choice.

The Farm to Fork Strategy has put ‘food environments’ at the heart of the EU food policy agenda. The **importance of food environments cannot be understated**: they are critical for understanding how eating patterns come about and how they can best be shifted.⁶⁹

The term food environment refers to the **“physical, economic, political and sociocultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food.”**⁷⁰

In contrast to consumer-centric perspectives which, wrongly, put the burden of dietary change on

individuals, the ‘food environment approach’ recognises that **food choices are shaped by the contexts within which they are made**. Following from that, it recognises that the most effective and equitable way to shift food consumption patterns is to change the contexts that drive food choice.*

Food environments are largely **shaped by food businesses in the ‘middle of the food chain’**, such as retailers, manufacturers, food service companies, advertisers, and others. Setting new ‘rules of the game’ for such actors, often through regulation, is a central pillar of creating health-enabling food environments and a recognition of the commercial determinants of health.

A vision for enabling food environments²⁰⁸

“Creating enabling food environments means ensuring that foods, beverages and meals that contribute to sustainable healthy diets are the most available, accessible, affordable, pleasurable, and widely promoted.

Such environments make the healthy and sustainable choice the default and most desirable choice, while limiting the availability and promotional opportunities for foods associated with unhealthy and unsustainable diets.

Sustainable food environments, furthermore, drive demand for socially just supply chains and production models that work with nature, rather than against it, that are climate-proof, and that take high levels of animal welfare as their starting point.”

* For a comprehensive explanation of food environments and their role in EU food systems change see: Policy briefing, [Food Environments & EU Food Policy. Discovering the role of food environments for sustainable food systems](#) (2021) EU Food Policy Coalition

The Farm to Fork Strategy recognises that current food environments are responsible for **eating patterns not being in line with dietary recommendations** and aims for the “creation of a favourable food environment that makes it easier to choose healthy and sustainable diets”.

While the strategy introduces several important actions to that effect, the proposed measures and instruments do not appear to have been based on a **systematic analysis about the policy needs** and current gaps in European food regulations.⁷¹ Although Europe’s Beating Cancer Plan provides several complementary actions for the creation of healthy food environments,⁷² a more joined-up approach is desirable.

A more coherent plan of action for the **creation of health-enabling food environments** is proposed below, based on the Healthy Food Environment Policy Index (Food EPI) framework.⁷³

This includes a **package of EU food policy recommendations focused on seven key dimensions of food environments**. The recommendations cover both actions to improve the properties of the foods on the market, and to shift the relative availability, accessibility, affordability, and desirability of foods towards contributing to sustainable healthy diets. The recommendations are informed by public health positions by EPHA and its members.^{74 75 76 77 78 79 80 81}

SEVEN DIMENSIONS OF FOOD ENVIRONMENTS WITH POLICY RECOMMENDATIONS

1. FOOD PROPERTIES

Objective: Foods placed on the EU market conform to the highest possible health, labour, social, climate, environmental, and animal welfare standards. Processes are in place to regularly review standards upwards and introduce new ones when required.

Only foods complying with such standards may be placed on the EU market. Non-compliance with key sustainability regulations leads to the withdrawal of such foods from the market, similar as is currently foreseen in EU legislation on food safety.⁸²

Recommendations

- The EU should design the upcoming Legislative framework for sustainable food systems to ensure that **foods placed on the internal market** maximise health and other sustainability characteristics.
- The EU should **set maximum levels for certain nutrients of concern**, such as sugars, fats, and salt in sensitive product categories, including foods for babies and infants and certain other processed products regularly consumed in Europe.
- The Commission should monitor and ensure compliance with the **antibiotic use** provisions of the Veterinary Medicines and Medical Feed Regulations.⁸³ The EU should update animal welfare legislation, including with a view on how higher animal welfare standards could create the conditions to reduce the need for farm antibiotic use.⁸⁴

- The EU should introduce and regularly update **regulatory standards** to reduce greenhouse gas and air pollutant emissions, pesticide hazards and nitrogen pollution linked to food production. The Commission should monitor and ensure compliance with these standards.
- The EU and national governments should implement and enforce the Common Fisheries Policy to ensure the **seafood** that reaches European consumers derives from sustainably managed fisheries.⁸⁵
- The EU and national governments should ensure supply chains deliver **fair prices** for producers and should, in consultation with social partners, set and uphold decent **minimum wages** and adequate **labour standards** for food workers.
- The European Commission, European agencies and national governments should ensure and enforce strict **food safety** standards.
- The EU should introduce adequate legislative standards to minimise the risk of exposure to **dangerous chemicals from food packaging**.

2. FOOD LABELLING

Objective: Labels applied to the packages of food products in the EU make it easier for consumers to navigate the foods on the market and take informed purchase decisions based on nutrition and other key sustainability indicators.

Alcoholic beverages are covered by the same nutritional labelling rules as non-alcoholic beverages. Food packages, including any labels, claims or representations used, do not mislead consumers as to the nature of the product.

Recommendations

- The EU should adopt a **mandatory front-of-pack nutrition labelling scheme** to be applied throughout the EU. In the absence of such a scheme, the introduction of national mandatory schemes should be allowed.

A European front-of-pack nutritional labelling scheme should be:⁸⁶

- Based on the mission to promote good health;
- Mandatory;
- Interpretative;
- Based on uniform reference values (e.g. per 100g or 100ml);
- Mixed, in terms of highlighting both positive and negative attributes;
- In line with the WHO 15 draft principles on FOP labelling.

- The EU should adopt **nutrient profiles** to remove the risk of consumers being misled by health or nutrition claims placed on products with poor nutritional quality.⁸⁷
- The European Commission should propose **sustainability labelling principles** based on robust methodologies that provide clear and meaningful information to consumers about selected environmental and social dimensions of sustainability. It should also ensure that **food packages** do not mislead consumers regarding the sustainability credentials of the food product.

3. FOOD PROMOTION AND MARKETING

Objective: Only those foods that contribute to sustainable healthy diets are promoted across the EU. This is made possible, among others, by having strict regulations in place that minimise the opportunities to market and advertise foods associated with unhealthy, unsustainable diets.

Recommendations

- The EU should ensure that European funding for the **promotion of agricultural products** is dedicated to health-enhancing food products that are currently under-consumed. Nutritionally poor food and foods whose current high levels of consumption pose sustainability challenges, as well as alcoholic drinks,⁸⁸ should be excluded from eligibility for promotional support.⁸⁹
- The EU should adopt comprehensive legislation to **minimise the exposure of children to the marketing of nutritionally poor food**, with child defined as any person until the age of 18.⁹⁰
- The Commission should review compliance across the EU with the provisions and spirit of the **International Code of Marketing of Breast-milk Substitutes** and propose legislation and other relevant actions to address insufficiencies.⁹¹

4. FOOD PROVISION

Objective: The procurement and provision of food by national, local, and European public bodies contributes to sustainable healthy diets, while incentivising fair and just supply chains and labour rights, as well as climate and environmentally friendly production methods with high levels of animal welfare.

Food provision is conceived as contributing to the right to food, focused on providing access to the best possible food and diets for all, especially schoolchildren from underserved communities.

✔ Recommendations

- The EU should adopt minimum mandatory criteria for **sustainable food procurement**. At their very least, these should include criteria on the nutritional quality of foods and menus, the share of organic products in procurement, the share of foods from other quality or sustainability schemes, and the share of plant-based menus offered.⁹²
- The EU and national governments should ensure adequate support, including financial, by drawing on existing EU financial mechanisms, to enable the achievement and exceeding of **minimum procurement requirements**.^{93 94}

The EU **School scheme for the distribution of fruit and milk** should be redesigned to contribute to healthy school food environments, including by supporting innovation in public procurement practices.⁹⁵

5. FOOD RETAIL AND SERVICE

Objective: Food retail and food service outlets, both physical and digital, make the healthy, sustainable food options the most available, accessible, and desirable options.

In such settings, foods associated with unhealthy, unsustainable diets are not promoted, including through price, promotional offers, preferential placing, or other means of increasing the desirability of such foods.

✔ Recommendations

- National governments, supported by the European Commission, should elaborate and periodically update **national 'sustainable healthy food policy plans'** with a strong emphasis on **retail and food service settings**, both physical and digital.

Such plans should include a range of regulatory and non-regulatory actions advanced at national, regional and local levels to create enabling food environments, such as introducing policies and approaches to remove nutritionally poor foods from near checkout counters; improve the positioning of foods associated with sustainable healthy diets in retail settings; restrict price promotions on nutritionally poor foods and foods with heavy environmental footprints; determine where and how food outlets can operate in the urban environment; improve the food offer in (fast food) restaurants and food delivery services; support direct and short supply chain, including by supporting the inclusion of small and micro food producers into supply chains; limit portion and packaging sizes; and more.⁹⁶

6. FOOD PRICES AND FOOD ACCESS

Objective: The relative prices of food products support the uptake of sustainable healthy diets. Food prices across the EU reflect more closely the true cost and value of food in view of current health and other sustainability challenges. Food prices also allow decent wages for workers, and incomes for producers who employ methods that are better for people, climate, biodiversity, and animals.

All people in the EU can have access to healthy food and diets.

Recommendations

- National governments should apply **differentiated VAT regimes** to support healthy, under-consumed products, such as fruit, vegetables, and nuts, and discourage products that contribute to unhealthy, unsustainable diets.
- National governments should **subsidise healthy, under-consumed products** such as fruit and vegetables,⁹⁷ including through their national Common Agricultural Policy (CAP) Strategic Plans.⁹⁸
- National governments, supported by the European Commission, should introduce **taxes on foods high in sugars, fats, and salt (HFSS)**, including but not limited to soft drinks. The European Commission should introduce a proposal for a framework Directive on HFSS food taxation.
- National governments, supported by the European Commission, should align their food policy and social policy agendas, and introduce **non-stigmatising fiscal and social policy measures** to support access to healthy food and diets for people experiencing socio-economic vulnerabilities.
- The European Commission should support research, piloting, and modelling to explore the most effective and equitable ways of using pricing, fiscal, and supply chain measures to improve the **alignment of food prices with sustainability requirements**.

7. FOOD TRADE AND INTERNATIONAL AGREEMENTS

Objective: Food imported into the EU is produced following equivalent health and other sustainability standards as applicable to domestic products, for key indicators. EU development funding is used to support small-scale producers from eligible countries to achieve such equivalence.

Imports do not contribute to biodiversity degradation and the undermining of labour rights. Trade and investment agreements the EU enters into do not result in ‘regulatory chill’ in either the EU or third countries, and do not preclude any country from shaping their food systems.

Recommendations

- The EU should ensure that **import standards**, for key indicators, are set at equivalent levels as health, environmental, labour, and animal welfare standards applied and enforced in the EU. This coupled with assistance to third country producers from lower income countries to achieve those standards. Such rules should include barring the entry of animal foods using antibiotics as growth promoters and subsequently those produced under routine application of antibiotics.
- The EU should, in trade and investment agreements with third countries, include binding provisions that underline the EU’s commitment to ensuring sustainable food systems, including the right of third countries to shape their own food policies and not to reduce the levels of health, social and environmental protection afforded by domestic laws. A **binding health chapter** should be included in each agreement.⁹⁹

V. Food security is about social policy and nutrition-sensitive production

The surest way to achieve food security within planetary boundaries, is to make healthy nutrition for all the focus of food systems policies.

In response to the COVID-19 pandemic, a food security pillar was prominently included into the Farm to Fork Strategy. Following the invasion of Ukraine, **food security is once more at the top of the European political agenda.**^{100 101 102}

Food security, which is “a situation that exists when all people, at all times, have physical, social and economic access to sufficient, safe, and nutritious food that meets their dietary needs and food preferences for an active and healthy life”,¹⁰³ is **critical for human health.**

It is unfortunate therefore that debates on food security tend to emerge primarily in the context of crises. The Farm to Fork Strategy too focuses its food security pillar on developing a “contingency plan for ensuring food supply and food security to be put in place in times of crisis”. Such a **narrow framing of food security** risks creating false paradigms and partial responses that prioritise food supply, without sufficient regard for the other elements that constitute food security.¹⁰⁴

Food security, properly understood, consists of **six indivisible and mutually reinforcing pillars:**¹⁰⁵

1. **Availability:** having a sufficient supply of food both in quality and quantity;
2. **Access:** having adequate resources for acquiring appropriate foods for a nutritious diet;
3. **Utilisation:** having a nutritious diet, supported by enabling food environments;

4. **Stability:** having the ability to ensure food security during crises;
5. **Agency:** having the capacity as individuals or groups to shape the food system;
6. **Sustainability:** having a food system that meets today’s needs without endangering the needs of future generations.

While achieving food security does require mechanisms for crisis response, policies should equally prioritise tackling the **structural factors that impede the achievement of food security**, both now and in the future:

- Nearly 8% of the EU population, or over 35 million people, is unable to afford a nutritious meal every second day;¹⁰⁶
- Approximately one in five Europeans is at risk of poverty or social exclusion;¹⁰⁷
- Cascading hazards from climate change and biodiversity loss endanger food production;¹⁰⁸
- Food security is not just about having enough calories, but about healthy nutrition;
- Large disparities exist in both income and wealth among food producers;¹⁰⁹

Seen in this light, food security deserves to be a permanent focus of food policy, not just when confronted with crises. A strategy to achieve food security in Europe should focus on **drastically reducing social inequalities**, which is a precondition for ensuring access to healthy

food and diets for all. The Commission's recent communication on "Safeguarding food security and reinforcing the resilience of food systems"¹¹⁰ moves closer towards recognising the structural challenge of access to healthy food for lower-income households. However, a more elaborate, comprehensive, and coordinated strategy to strengthen and expand social protection systems is needed for tackling issues of food affordability.¹¹¹

Food security should, notably, also be based on rethinking land use and agricultural policies, making them 'nutrition-sensitive'. **Nutrition-sensitive agriculture** refers to a food-based approach to agriculture, which puts nutritionally rich foods and dietary diversity at the heart of food system policies.^{112 113} While usually applied to the context of 'developing' countries, the concept has major relevance for Europe. Focusing land use policies on attaining population-level nutritional goals based on sustainable healthy diets, is probably the surest way to **achieve food security within planetary boundaries**.¹¹⁴

The EU **Common Agricultural Policy (CAP)** and the national CAP Strategic Plans, should play an important role in aligning agricultural policies with health objectives.^{115 116} The new CAP specific objective on "food and health"¹¹⁷ provides an especially promising entry point to support the production of healthy, under-consumed products.¹¹⁸ Likewise, funding should advance sustainable production, for instance by supporting **agroecological approaches**.¹¹⁹ A Europe based on agroecological farming in the context of sustainable healthy diets is possible and has been shown to be able to significantly reduce climate and environmental impacts, while improving contribution to global food security.¹²⁰

Despite a prevailing narrative of 'Europe feeding the world', the opposite is true today. Europe is highly **dependent on the imports of human-edible crops** for further processing, especially in the form of animal products. The EU's exports, currently dominated by processed foods for higher-end consumers, do little to improve global food security.¹²¹

Access to food is about "having personal or household financial means to acquire food for an adequate diet at a level to ensure that satisfaction of other basic needs are not threatened or compromised".²⁰⁹

Nutrition-sensitive agriculture "is an approach that seeks to ensure the production of a variety of affordable, nutritious, culturally appropriate and safe foods in adequate quantity and quality to meet the dietary requirements of populations in a sustainable manner".²¹⁰

Agroecology is an "integrated approach that simultaneously applies ecological and social concepts and principles to the design and management of food and agricultural systems. It seeks to optimize the interactions between plants, animals, humans, and the environment while taking into consideration the social aspects that need to be addressed for a sustainable and fair food system".²¹¹ Agroecology is a science, a practice, and a social movement.²¹²

Recommendations

1. The European Commission should adopt a **comprehensive understanding of food security** based on its six core pillars and emphasise the key contribution of the European Green Deal, as well as social and nutrition policies to long-term food security.
2. The European Commission and national governments should draw up a dedicated **European strategy for ensuring access to healthy food and diets for all**, with a focus on coordinating the use of economic and social policy instruments.

The European Commission should, in its upcoming proposal for a Legislative framework for sustainable food systems, ensure that the implementation of Europe's sustainable food policy is integrated with its social and economic policies, including the European Pillar of Social Rights, the Child Guarantee, and the European Semester process.

3. The European Commission should explore the paradigm of a **'nutrition-sensitive' approach to food, agriculture and land use** and put it at the heart of Europe's thinking around and incentives for the food system, with reference to the principles of agroecology.
4. National governments, supported and overseen by the European Commission, should use their **CAP Strategic Plans** to support a nutrition-sensitive agricultural sector.

VI. Sustainability should be driven by people-centred objectives

People's health and well-being should be at the heart of food systems reform, driven by health-oriented targets and objectives.

The Farm to Fork Strategy is based on three overarching objectives and sets several tangible targets. Targets, when well-selected, can be **useful for signalling ambition, setting a clear direction of travel and monitoring progress**. The strategy's targets on reducing the use of pesticides and fertilisers and the sales of antimicrobials, as well as increasing organic farming and aquaculture are quite relevant to people's health.

However, despite the strategy's aim to facilitate a shift to "healthy, sustainable diets" and the desire to reverse "the rise in overweight and obesity rates across the EU by 2030", it **sets no targets that relate to these goals**.

Likewise, while pointing out that a sustainable food system "must ensure sufficient and varied supply of safe, nutritious, affordable and sustainable food to people at all times", no concrete achievements are proposed that relate to **tackling inequalities in access to healthy food and diets**.

A comprehensive food systems transformation should address all sustainability dimensions.¹²² **Health and social fairness are key pillars of sustainability**. This calls for the addition of specific objectives and targets that directly relate to people's health and well-being, setting the pace for a health-oriented food system with the ensuing social, environmental, and economic benefits.

Recommendations

1. The European Commission, in its upcoming proposal for a Legislative framework for sustainable food systems, should fill the gaps in the current Farm to Fork Strategy by **adding specific objectives and targets** related to:
 - The uptake of sustainable healthy diets;
 - Halting and reversing obesity, and potentially other diet-related NCDs;
 - Expanding access to health-promoting foods and diets, especially for people experiencing socio-economic vulnerabilities.
2. The European Commission in its upcoming proposal for a Legislative framework for sustainable food systems should make the **current targets in the Farm to Fork Strategy legally binding**, accompanied by a mechanism to allow them to be revised upward as required.

VII. Great expectations: the sustainable food systems law must be a game-changer

The upcoming EU Legislative framework for sustainable food systems is the best, and maybe last, chance to put Europe's food system on track to support a healthy future. An opportunity that cannot be missed.

The upcoming Legislative framework for sustainable food systems,¹²³ if well-designed and implemented, can be the Farm to Fork Strategy's main legacy – its crowning achievement. This initiative has the potential to set the European food system on track towards sustainability, in line with the main recommendations in this paper. It is critical therefore, that the **framework is conceived as a comprehensive game-changer, not only as a series of incremental steps.**¹²⁴

The **importance of a legislative approach** to food systems change must be emphasised. The evidence that binding policy measures, such as regulatory measures like bans, minimum requirements and maximum ceilings, as well as fiscal measures, are more effective in enabling change is overwhelming, and summed-up well by the EU's chief scientific advisors.¹²⁵

This in contrast to **voluntary approaches**, such as the EU Code of Conduct on Responsible Food Business and Marketing Practices, another Farm to Fork initiative.¹²⁶ The latter can, at best, be seen as a complementary measure, but should not be relied on as a main driver of change.¹²⁷

To achieve its transformative potential, the legislative framework should be **designed to generate direct impact** in terms of the responsibilities it establishes on food system actors, both private and public. It should also **leverage the adaptation of existing sectoral regulations and policies** – including the next

CAP – and guide the creation of new policies, both at EU and national levels.¹²⁸

The success of the framework hinges not only on the strength of measures, but also on its field of focus. It is critical that the initiative takes a **food systems approach**, based on the intention to make the aggregate outcomes of the food system sustainable, including in its impacts on non-EU countries. It cannot be limited to a product-based approach, focused on individual foods on the market becoming increasingly 'sustainable'. This because the sustainability of individual foods cannot be understood outside the impacts of the entire system.

The **creation of enabling food environments** that empower people to contribute to sustainable food systems must be at the heart of the legislative framework. The absence of strong legislative measures to improve food environments would risk leaving demand-side action predominantly to voluntary initiatives. This would spell failure for the food systems agenda, given that voluntary initiatives have repeatedly shown to be a false promise in reforming food systems and improving health outcomes.^{129 130}

In designing an effective framework to deliver a comprehensive, fair, and sustainable transition it is critical to implement safeguards to prevent **vested commercial interests** from exerting undue influence over the policy-making process, thereby undermining the public interest vision.¹³¹

For too long commercial imperatives have dominated European food and agricultural policy. It is **time to put people and their rights to food and health first**. This means progressively approaching **food as a common good**, rather than a marketed commodity only. This will mean embedding a **rights-based approach** in the

legislative framework, with special emphasis on children's rights.^{132 133} As an extension of the rights-based approach, greater participation of people in the food system can be supported by providing effective judicial remedies to challenge infringements of the regulation.

Addressing food products and food systems

To shift towards a sustainability food system, the framework needs to ensure that both:

1. Individual foods, beverages and meals on the market maximise health and other sustainability characteristics (product-based approach); and
2. Average dietary patterns are healthy and sustainable (food systems-approach).

The legislative framework should, therefore, hasten changes in both (1) the properties of the foods on the market, and (2) in the relative availability, accessibility, affordability, and desirability of foods with a view on their contribution to sustainable healthy diets.

The legislative framework should, furthermore, do away with any ambiguities about alcohol as part of the sustainable food systems debate. While alcohol, given its particular properties, needs a specially dedicated approach in terms of regulation,¹³⁴ it is critical not to exclude alcoholic drinks from improvements in EU food policy legislation. There can be **no sustainable food system that leaves alcoholic drinks underregulated**.

Annex.

Some main ways in which current food systems affect human health in Europe

Some of the most **prominent ways in which food systems affect human health in Europe** include:

- **Unhealthy diet** is a leading underlying cause of the burden of disease in the EU. In 2019, over 814,000 premature deaths and over 14 million healthy life years lost in the EU were attributed to unhealthy diet.^{135 136} Unhealthy diets, driven by unhealthy food environments, have primarily been linked to the excessive consumption of energy, fats, sugars and salt, as well as low consumption of vegetables, fruits and whole grains.¹³⁷ While current levels of food availability and accessibility support adequate nutrition for many Europeans, lower than recommended intakes of micronutrients can pose health concerns for particular population groups.¹³⁸ People exposed to socio-economic vulnerabilities are disproportionately affected by unhealthy diets and resulting health harms, further entrenching social inequalities.^{139 140 141 142}
- **Climate change** is the single biggest health threat facing humanity.¹⁴³ Current food systems are responsible for around a third of global greenhouse gas emissions.^{144 145 146} The climate emergency is already contributing to Europe's burden of disease, including through heat-related deaths, floods, infectious diseases, allergies and mental ill-health.^{147 148} Dependent on the extent of further warming and the adaptation measures taken, future impacts may be incomparably greater, deeply affecting natural conditions and social dynamics, with major repercussions for health, well-being and food security.¹⁴⁹
- **Antimicrobial resistance (AMR)**, or drug resistance, threatens the effective treatment of infections and endangers critical healthcare interventions, from surgeries to chemotherapy.¹⁵⁰ It is a major threat to human health, with 1.27 million deaths globally attributed to bacterial AMR.¹⁵¹ Resistance to antibiotics is also becoming more widespread in Europe, currently killing at least 33,000 people each year.¹⁵² While human medicine appears to be the leading cause, antibiotic overuse in animal farming has been conclusively linked to drug resistance in humans.^{153 154 155} Left unaddressed, 10 million people may die of AMR globally by 2050 or 390,000 in Europe.¹⁵⁶
- **Air pollution** is Europe's leading environmental health risk. Among pollutants, the health harms of small particulate matter (PM_{2.5}) pollution stands out, with over 300,000 premature deaths attributed to it in Europe in 2019.¹⁵⁷ Ammonia, over 90% of which in Europe is emitted by agriculture, contributes to the formation of PM_{2.5}.¹⁵⁸ Estimates vary, but findings suggest ammonia emissions to be a major contributor to PM_{2.5} formation in Europe and associated health harms.^{159 160 161}
- **Occupation** in food and agriculture can be part of a cherished socio-cultural identity. It also generates income, contributing to social well-being.¹⁶² At the same time, working conditions are often hazardous with significant risks related to accidents, the exposure to agrochemicals, musculoskeletal disorders, respiratory disease, exposure to infectious agents, risk of AMR, mental

ill-health and with often precarious conditions for food workers.^{163 164 165} Furthermore, income, socio-economic inequalities and inadequate labour conditions may impair the contribution that food-related professions can make to socio-economic well-being.^{166 167}

- **Infectious diseases** are in many ways connected to the functioning of food systems. Agriculture, through its contribution to global land use change and the conversion of natural habitats, plays a significant role in the risk of the emergence and spread of infectious diseases, especially of zoonoses.^{168 169 170 171} While 75% of new or emerging infectious diseases are of zoonotic origin,¹⁷² agricultural drivers have been associated with more than 25% of all, and more than 50% of zoonotic infectious diseases in humans since 1940.¹⁷³ At the same time, high-density animal farming systems can act as breeding grounds for new zoonotic diseases and may increase the risk of severe contamination events.^{174 175} Most food safety outbreaks in Europe are linked to zoonotic pathogens.¹⁷⁶
- **Chemicals** are widely used in all stages of the food system, from production to packaging. While the total burden of chemicals on human health in Europe is not known, the exposure to hazardous chemicals is associated with a wide range of serious health impacts, including chronic diseases, neurological disorders and developmental effects.¹⁷⁷ While pesticide residue levels in EU food are consistently within legal limits in around 95% of samples,¹⁷⁸ worries remain.¹⁷⁹ Moreover, the intensive and widespread use of agrochemicals in agriculture has led to concerns about the health impacts of long-term, low-dose exposures to chemicals, including on the endocrine system.^{180 181 182 183 184} Pesticides overuse is also a main contributor to pollinator decline, entailing risks for future food security and nutrition.^{185 186 187} Chemicals in food packaging can likewise pose significant health risks.^{188 189 190 191 192} Emerging studies point to microplastics as a possible public health problem.^{193 194 195}

It deserves to be noted that while some health impacts are well-described, others, while potentially very significant, remain **insufficiently quantified**, such as in the case of chemicals.^{196 197} In some cases, current levels of impact may be well-below future hazards, leading to a **possible underestimation of risks**. This could, for instance, be in the case of runaway climate change, a sudden global outbreak of an infectious disease, the spread of antimicrobial resistance, or the cumulative effects of continued biodiversity loss.^{198 199}

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