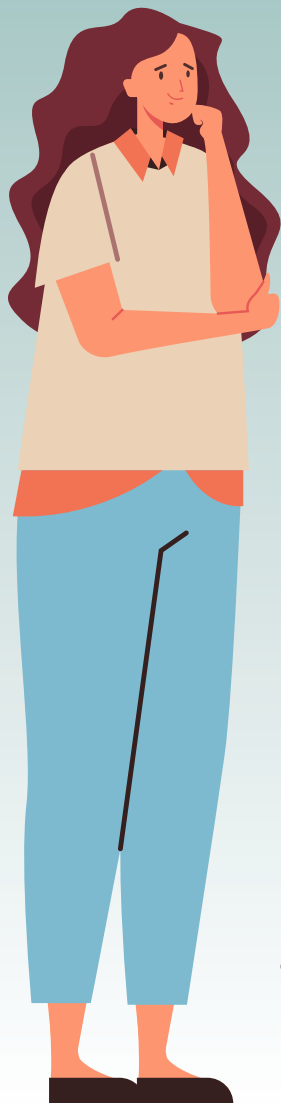


THE ILLUSION OF CHOICE

Why someone already decided what you will eat for lunch



**PUT CHANGE
ON THE MENU**

THE 'PUT CHANGE ON THE MENU' PROJECT

As the European Commission is due to propose a landmark law on sustainable food systems in the autumn of 2023, Eurogroup for Animals, the European Consumer Organisation (BEUC) and the European Public Health Alliance (EPHA) have joined forces for a project called 'Put Change on the Menu'. Their aim is to move the debate around food environments to the forefront and campaign for food environments that promote healthy, sustainable diets that feature 'less and better' animal products.



GLOSSARY

ASF	Animal source foods
FAO	Food and Agriculture Organisation of the United Nations
FBDGs	Food Based Dietary Guidelines
FSFS	Framework for Sustainable Food Systems
HFSS	High fat, sugar and salt foods
NCDs	Non-communicable diseases
WHO	World Health Organization

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EXECUTIVE SUMMARY

There is growing evidence that consumers' food choices are shaped by the 'food environments' they navigate in. **Most individuals, however, do not realise the extent to which their eating habits are steered by a multiplicity of factors**, from the ads they keep seeing on billboards in the street to the range of food products that is available at the supermarket, through the promotional offers and discounts offered by retailers.

Today's food environments largely push consumers towards diets which are not in line with healthy eating recommendations. Yet **shifting to healthy, more plant-based diets with 'less and better' animal source foods (ASF) can benefit people's health while bringing a series of co-benefits** for climate and the environment, farm animal welfare, and food security.

The European Commission has announced a proposal for a legislative Framework for Sustainable Food Systems (FSFS) for the autumn of 2023. This landmark law must **pave the ground for a transformation of food environments** through subsequent policy measures and interventions, both at EU and national level, to address the **availability, affordability, and desirability of healthy and sustainable food**. Specifically:

THE HEALTHY AND SUSTAINABLE FOOD CHOICE MUST BE THE MOST AFFORDABLE ONE. Food prices need to send the right signal and support the shift to diets richer in fruit, vegetables, and pulses and with 'less and better' ASF. Retailers should be required, through their price and promotion strategies, to increase the affordability of healthy and sustainable food. Governments should also act (via fiscal measures and subsidies) to make healthy and sustainable food more affordable.

THE HEALTHY AND SUSTAINABLE FOOD CHOICE MUST BE WIDELY AVAILABLE AND ATTRACTIVE. Retailers should improve the availability and appeal of healthy and sustainable food – while restrictions should apply to the placement of unhealthy products in prominent locations. Governments should set targets for increasing the proportion of supermarket sales from healthy and sustainable food at national level.

THE HEALTHY AND SUSTAINABLE FOOD CHOICE MUST BE THE MOST MARKETED. The EU should regulate (ban) the marketing of unhealthy food to children (under 18). As for its own promotion policy for agricultural products, the EU should ensure it is aligned with healthy eating guidelines and only promotes products Europeans should consume more of.

THE HEALTHY AND SUSTAINABLE FOOD CHOICE MUST BE EASY WHEN EATING OUT. Food and beverage service chains and meal delivery platforms should be required to provide calorie information on menus and adapt their offer in line with healthy and sustainable eating recommendations.

THE HEALTHY AND SUSTAINABLE FOOD CHOICE MUST BE THE DEFAULT CHOICE FOR PUBLIC PROCUREMENT. Mandatory requirements should be introduced for sustainable public food procurement, covering the environmental, social-health (including animal welfare) and economic dimensions. Member States should be required to update their food-based dietary guidelines with a view to integrating sustainability, so that these could serve as a reference for procuring sustainable and healthy meals in public settings.

FOOD MUST BECOME HEALTHIER AND MORE SUSTAINABLE BY DESIGN. As announced in the Farm to Fork Strategy, the EU should stimulate reformulation of processed food, including via the setting of maximum levels for certain nutrients (saturated fat, added sugars and salt). To increase the availability of 'better' ASF, EU farm animal welfare standards should be strengthened and should apply equally to imported products.



SETTING THE SCENE

Contrary to the dominant narrative that tends to blame consumers for making the ‘wrong’ food choices, there is growing evidence that individual choices are shaped by the so-called ‘food environments’ consumers navigate in. When shifting focus onto the concept of food environments, it becomes clear that **there is no such thing as a free consumer choice taken in a vacuum and based on the best available information,¹ but rather a complex range of influences beyond individual control.** Currently, food environments do not ensure that the healthy and sustainable option is always the easiest one for consumers.²

Most individuals do not realise the extent to which their choices are steered by a multiplicity of factors, from the ads they keep seeing on billboards in the street to the range of food products that is available at the supermarket where they shop, through the promotional offers and discounts offered by retailers.

THE CONCEPT OF ‘FOOD ENVIRONMENTS’

Food environments are the “physical, economic, political and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food”.³ The factors influencing consumer choice range from marketing and advertising, promotional offers, food availability and price, spatial layout in supermarkets and many more.

The concept of food environments has been extensively described and explained in a policy brief developed by 24 civil society organisations participating in the EU Food Policy Coalition, including BEUC, EPHA and Eurogroup for Animals.⁴ This report supplements it and offers a practical understanding of food environments through real-life examples of both good and bad food environments.

1 What’s happening at EU level?

The Farm to Fork Strategy, the EU’s sustainable food and farming blueprint published by the European Commission in 2020, states clearly that current consumption patterns in the EU are not sustainable from both an environmental and economic point of view.⁵ It notes that average intakes of energy, red meat (incl. beef, pig, lamb, and goat meat) and processed meat, sugars, salt and fats continue to exceed recommendations, while the consumption of whole-grain cereals, fruit, vegetables, legumes and nuts is insufficient.⁶

Although it recognises the role of food environments and considers that all actors in the food chain should see it as their responsibility to support consumers in choosing healthy and sustainable food, the Farm to Fork Strategy falls short of making concrete proposals for creating *favourable* food environments. Instead, it focuses on “empowering consumers to make informed, healthy and sustainable food choices” primarily with the help of labelling.⁷ However, **while consumer information and labelling are important and necessary** (both to allow for informed consumer choices and to incentivise producers to improve their products), **evidence shows that such measures are insufficient on their own.** Consumer choices are heavily influenced by other elements of food environments, such as advertising and marketing, availability, or pricing.

¹ Scientific Advice Mechanism, Group of Chief Scientific Advisors (2020) [Towards a sustainable food system](#). Scientific Opinion Nr. 8. European Commission

² Farm to Fork Strategy <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381>

³ HLPE (2017) [Nutrition and food systems](#). A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome.

⁴ Policy brief on Food Environments & EU Food Policy. *Discovering the role of food environments for sustainable food systems* (2021) produced in the framework of the EU Food Policy Coalition.

⁵ https://food.ec.europa.eu/system/files/2020-05/f2f_action-plan_2020_strategy-info_en.pdf

⁶ Willett W. et al (2019), ‘Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems’, in *Lancet*, Vol. 393, pp. 447–92.

⁷ Farm to Fork Strategy <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381>

In the autumn of 2023, the European Commission is due to present a **proposal for a legislative Framework for Sustainable Food Systems (FSFS) as one of the flagship initiatives** of the Farm to Fork Strategy. This legislation is expected to introduce definitions, key objectives and principles to pave the way for existing and future EU and national food laws to establish a sustainable food system that operates within planetary boundaries. This must include promoting favourable food environments where healthy sustainable diets, which are more plant-based and with ‘less and better’ animal products, are the easy choice for people.

2 Reality check: collecting examples from across Europe

While people experience it in their daily lives, the concept of a ‘food environment’ may sound dry to many and not immediately relatable, paradoxically. With this report, we aim to **make it tangible by bringing concrete examples of the practices – good or bad – which push consumers towards healthy and sustainable (or conversely, unhealthy and unsustainable) food choices.**

With the help of the respective membership of our organisations, we collected evidence and examples of such practices by a range of actors (including retailers, the hospitality sector, canteens, etc.) across Europe. The report does not aim to be (nor should it in any way be considered as) an exhaustive review of good and bad practices by food chain actors or of the factors contributing to food environments. Rather, our action provides an illustrative snapshot of the many factors that constantly influence consumer choices and preferences.

FOOD ENVIRONMENTS FOR SUSTAINABLE HEALTHY DIETS

1 What do we mean by favourable food environments?

For the scope of this report, ‘enabling’ or ‘favourable’ food environments are understood as the practices which encourage and incentivise the consumption of healthy, nutritious and environmentally friendly foods - minimally processed plant-based foods such as fruits, vegetables, legumes, nuts and wholegrains – as well as limited amounts of animal source foods (ASF) of high animal welfare standards.

On the contrary, practices not in line with the above criteria are considered as contributing towards ‘unfavourable’ food environments. This includes practices that push consumers towards consuming foods contributing most to unhealthy diets – such as highly processed foods high in fat, sugars, and salt (HFSS), as well as red and processed meat. Diets that heavily rely on these products are linked to the development of multiple non-communicable diseases (NCDs), such as obesity, diabetes, several types of cancer, and cardiovascular diseases.⁸ Practices that push consumers towards consuming foods with high environmental impact and/or low animal welfare standards, such as ASF from industrialised livestock systems, are also considered as

⁸ NCD Alliance (2022) [Unhealthy diets and malnutrition](#)

contributing towards unfavourable food environments.

WHAT DO SUSTAINABLE HEALTHY DIETS CONSIST OF?

According to the Food & Agriculture Organisation (FAO) and the World Health Organization (WHO), sustainable healthy diets “have low environmental pressure and impact, are accessible, affordable, safe and equitable and are culturally acceptable”. They are “based on a great variety of unprocessed or minimally processed foods, balanced across food groups, while restricting highly processed food and drink products”. They “include wholegrains, legumes, nuts and an abundance and variety of fruits and vegetables” and “can include moderate amounts of eggs, dairy, poultry and fish; and small amounts of red meat”.

In the EU, average intakes of energy, red and processed meat, sugars, salt, and fats continue to exceed recommendations, whereas consumption of whole-grain cereals, fruit and vegetables, legumes and nuts is insufficient.

[FAO and WHO. 2019. [Sustainable healthy diets – Guiding principles](#). Rome.]



2 ‘Less and better’ animal source foods

Current intakes of ASF – especially meat – are not in line with **dietary recommendations**, with meat intake levels exceeding these by 2-4 times.⁹ At the same time, only 12% of the EU population consumes the recommended five portions or more of fruits and vegetables daily.¹⁰ Aligning Europeans’ diets with healthy eating recommendations would contribute to food security, as a considerable proportion of agricultural land is used to produce feed rather than food for direct human consumption.¹¹ It would also significantly reduce the environmental footprint of food systems.¹²

Indeed, animal agriculture is largely known as one of the main drivers of **climate change and biodiversity loss**. Food represents 42% of the environmental impacts of the consumption of an EU citizen¹³ – with multiple planetary boundaries crossed by the EU’s food system alone¹⁴ – and within the food category, animal-based products, e.g. meat, dairy, and eggs, are responsible for the largest share of the impacts of food consumption for most impact categories.

When adding emissions related to the production, transport, and processing of feed to the European agricultural sector emissions, the livestock sector is responsible for 81-86% of total agricultural **greenhouse gas (GHG) emissions**.¹⁵ The Intergovernmental Panel on Climate Change (IPCC) has recognised that changes to lifestyles and behaviour, including shifting to sustainable healthy diets, can result in a 40-70% drop in GHG emissions worldwide by 2050, while also improving health and wellbeing.¹⁶

Several European countries have updated their **national food-based dietary guidelines (FBDGs)** to factor in the environmental impacts of food choices. For instance, Denmark updated its FBDGs in 2021 to urge people

⁹ EC, 2023. [Drivers of food security](#)

¹⁰ Numbers from 2019. Eurostat: How much fruit and vegetables do you eat daily? <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20220104-1>

¹¹ EC, 2023. [Drivers of food security](#)

¹² Farm to Fork Strategy: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381>

¹³ Sala, S. and Sanye Mengual, E., Consumption Footprint: assessing the environmental impacts of EU consumption, European Commission, 2022, JRC126257.

¹⁴ Calculated *per capita*, with Planetary Boundaries allocated equally among the global population.

¹⁵ Data from 2017. EC, 2020. [Future of EU livestock: how to contribute to a sustainable agricultural sector](#)

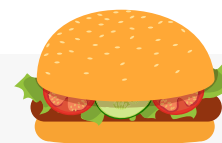
¹⁶ IPCC, 2022: Summary for Policymakers [P.R. Shukla, J. Skea, A. Reisinger, R. Slade, R. Fradera, M. Pathak, A. Al Khourdjie, M. Belkacemi, R. van Diemen, A. Hasija, J. Malley, D. McCollum, S. Some, P. Vyas, (eds.)]. In: *Climate Change 2022: Mitigation of Climate Change. Contribution of Working Group III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [P.R. Shukla, J. Skea, R. Slade, A. Al Khourdjie, R. van Diemen, D. McCollum, M. Pathak, S. Some, P. Vyas, R. Fradera, M. Belkacemi, A. Hasija, G. Lisboa, S. Luz, J. Malley, (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA. doi: 10.1017/9781009157926.001.

to eat more fruit, vegetables and legumes and less meat. The recommended amount of meat was reduced from 500g to 350g per week in the new guidelines, and Danes are advised to eat 100g of legumes, in addition to 600g of fruit and vegetables, a day.¹⁷ Similarly, Spain has updated its FBDGs and recommends a maximum of three portions of meat per week.¹⁸

Human and animal health are intrinsically linked, as acknowledged by the One Health approach. One key aspect linking the two is the use of antimicrobials, of which the inappropriate use – in both humans and animals – fuels **antimicrobial resistance (AMR)**. The WHO has declared AMR one of the top 10 global public health threats facing humanity.¹⁹ In the EU, the routine preventative use of veterinary antibiotics has been banned since January 2022.²⁰ Sales of veterinary antibiotics have almost halved between 2011-2021, according to the latest EU data. Between 2018 and 2021, Member States have achieved approximately one third of the Farm to Fork Strategy's 50% reduction target set for 2030.²¹ Nevertheless, some countries continue to lag behind. As the pace of the decline in antibiotic sales appears to have slowed since 2017, efforts to sustain this descending trend must be maintained.

Lastly, EU **animal welfare** standards are currently not up to pace with scientific developments and European citizens' expectations that farm animals should live a good life.²² The minimum set of rules established by EU legislation only provides a sub-optimal level of farm animal welfare, as the Fitness Check of the EU Animal Welfare legislation found.²³ In the absence of more ambitious rules, consumers willing to purchase ASF derived from animals which have been kept in better conditions must look for the organic label or other labels developed by the private sector – some of which have questionable trustworthiness. For the scope of this report, we have used the organic label as a proxy for 'better' ASF as this is the only harmonised EU label which can be considered as indicating better animal welfare.

Both reducing the consumption of animal source foods and changing the way animals are raised is key to tackling the above-mentioned challenges.



WHAT ABOUT PLANT-BASED ALTERNATIVES TO MEAT AND DAIRY?

As an alternative to traditional ASF, we can find an increasing number of plant-based products on the market. **They play a role in transitioning to diets with lower amounts of animal proteins**, for example by offering convenience for consumers. However, just like their meat counterparts, such as burgers and sausages, plant-based products vary in nutritional quality (notably salt and saturated fat contents) and level of processing. **Food manufacturers should therefore work on improving the composition of these products**, including the bioavailability of key micronutrients (iron, calcium, B12, etc.) and the presence of potentially harmful substances (e.g. soy isoflavones).

The denomination of plant-based alternatives to ASF should **neither mislead consumers nor discourage them from buying these products**. For instance, the use of culinary *meaty* names on plant-based foods (such as *steak*, *sausage*, *burger*) makes it easier for consumers to know how to integrate these products within a meal, and as such should not be banned.

Plant-based alternatives to ASF can play an important role in supporting consumers to shift from high rates of ASF consumption to a greener dietary pattern. Nevertheless, the consumption of healthy plant source foods such as vegetables, legumes and pulses should be preferred.

¹⁷ [Danish updated Food Based Dietary Guidelines](#) (2021)

¹⁸ [Spanish updated Food Based Dietary Guidelines](#) (2022)

¹⁹ [WHO Antimicrobial Resistance fact sheet](#)

²⁰ [Regulation \(EU\) 2019/6 on veterinary medicinal products and repealing Directive 2001/82/EC](#)

²¹ European Medicines Agency, European Surveillance of Veterinary Antimicrobial Consumption, 2022. 'Sales of veterinary antimicrobial agents in 31 European countries in 2021' (EMA/795956/2022).

²² [End the Cage Age ECI](#)

²³ Commission Staff Working Document - [Fitness check of the EU Animal Welfare legislation](#). SWD(2022) 329.

WHAT SHAPES OUR FOOD CHOICES

The illusion of choice refers to the fact that, when making decisions on buying, cooking or eating food, consumers' preferences are highly influenced by multiple factors. Far from being random or unintentional, these factors have been meticulously studied and utilised to trigger the consumption of certain products.

Relying on willpower and consumers' responsibility (only) to make 'better' food choices has been proven an ineffective approach. As such, the WHO has criticised the continuing narrative that addressing obesity is the responsibility of the individual, and not the responsibility of the wider society including governments, as one of the barriers to implementing obesity policies.²⁴

Actively re-shaping food environments is needed to support healthier and sustainable food patterns. This can be done through policies and interventions addressing food availability, affordability, characteristics, and desirability.²⁵

1 The power of price signals

Food prices play a key role in shaping our purchasing and consumption decisions. In a recent survey of European consumers, price was found to be the **main barrier to sustainable eating**.²⁶

In the past years, food chain disruptions and a rise in cost for energy and fuel prices, exacerbated by Russia's invasion of Ukraine and the EU's dependency on imported agricultural inputs, have led to significant inflation, especially affecting consumers' shopping baskets.²⁷ Many consumer organisations in Europe reported that consumers changed their shopping behaviour as a result of the cost-of-living crisis, with some countries reporting that consumers increasingly skip meals, buy frozen food to cut costs or resort to ready meals.^{28,29} Food affordability and pricing remain one of the major concerns for consumers – even more so in times of crisis. Through their pricing strategies and promotions, businesses can therefore do a lot to support – or conversely, hinder – sustainable and healthy dietary habits.

1.1. Pricing strategies by food businesses

An obstacle to the consumption of (processed) plant-based alternatives to meat is their higher price (this is less true for unprocessed legumes and pulses, however).

Whereas the price difference between animal-based and plant-based processed products has narrowed over time,³⁰ it remains a deterrent for many consumers. Food businesses need to step up their efforts to try and close this gap.

²⁴ WHO European Regional Obesity Report 2022. Copenhagen: WHO Regional Office for Europe; 2022. Licence: CC BY-NC-SA 3.0 IGO.

²⁵ Food Policy Coalition (2021). Policy Brief. [Discovering the role of Food Environments for Sustainable Food Systems](#)

²⁶ BEUC, [One bite at a time: consumers and the transition to sustainable food](#), An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

²⁷ [Eurostat food price monitoring tool](#)

²⁸ e.g. [Consumer survey](#) done by Which?, BEUC member from UK.

²⁹ <https://www.ocu.org/consumo-familia/derechos-consumidor/noticias/inflacion-cambio-habitos>

³⁰ <https://proveg.com/press-release/dutch-survey-finds-price-gap-between-meat-and-meat-substitutes-is-shrinking/>



As an illustration of what the private sector can do, IKEA restaurants announced in October 2022 that they will offer plant-based items at the same or lower price than the meat-based alternatives. They also aim at making all main meals plant-based by 2025.³¹ In Slovakia for instance, the plant-based meatball dish costs €3,39 while the regular meatball menu is priced at €4,99.³² Similarly, the regular IKEA hotdog costs €0,79 compared to €0,59 for the plant-based one.

Bezmäsité guľôčky
8 ks, hrášok, smotanová omáčka, zemiaková kaša, brusnice
€3,39



Mäsové guľôčky 12 ks, príloha
€4,99



Hot dog
€0,79



Vegetariánsky hot dog
€0,59



Likewise, the price of organic food is a barrier to their greater purchase by consumers. More labour-intensive production methods and lower yields mean consumers expect to pay a premium for organic produce. But retailers' margin policies are compounding the situation, according to a study by French consumer group UFC–Que Choisir. They found that the price gap between organic and conventional fruit and vegetables is largely due to the premium charged by supermarkets, whose gross profit on organic products is much higher than on conventional products.³³ These excessive price mark-ups have also been denounced by farmers' organisations in France.³⁴



Fancy a snack? Sadly, the healthy choice is often not the most affordable one. Here a small Norwegian grocery store has bananas on offer that cost almost 50% more than a bag of processed cheese puffs.



³¹ [IKEA is making plant-based food more affordable and accessible for the many](https://www.ikea.com/sk/sk/stores/restaurant/svedska-restauracia-kaviaren-a-bistro-pub27586b70)

³² <https://www.ikea.com/sk/sk/stores/restaurant/svedska-restauracia-kaviaren-a-bistro-pub27586b70>

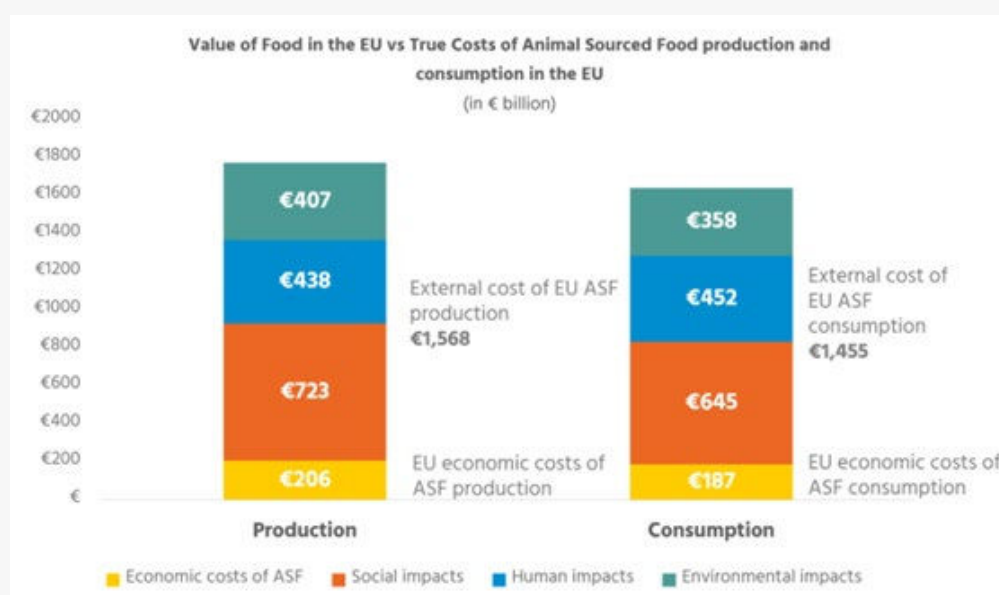
³³ <https://www.quechoisir.org/action-ufc-que-choisir-sur-marges-sur-les-fruits-et-legumes-bio-la-grande-distribution-matrasque-toujours-les-consommateurs-n69471/>

³⁴ <http://www.confederationpaysanne.fr/actu.php?id=12715&PHPSESSID=9868h9me2va7iup2qsnermn6p0>

THE HIDDEN COSTS OF ANIMAL SOURCE FOODS

Prices today poorly reflect the costs to society associated with food production and consumption. This is especially true for ASF. As an example, a recent EU Court of Auditors' report recognised that the widespread long-distance transport of live animals within and to and from the EU is only profitable because no monetary value has been assigned to animal suffering during transport. The Court instead recommended taking account of it in the transport costs and the price of meat.³⁵

Research commissioned by Eurogroup for Animals estimated the external 'hidden' costs of ASF *production* in the EU (including exports) at €1,567 billion – or approximately 7.6 times higher than the economic costs of producing ASF.³⁶ The external hidden costs of ASF *consumption* were estimated at €1,455 billion for 2022 – or approximately 7.8 times higher than the economic costs of EU animal source food consumption. Put simply, **the price paid by consumers in the shop represents an estimated 13% of the 'true costs' associated with ASF consumption in the EU.**



Economic costs of EU animal source food production and consumption compared to the total costs of animal source food production and consumption based on available data and the True Price method

Key causes of these hidden external costs are low animal welfare, diet-related diseases, and impacts to the environment (particularly air pollution and land use). These costs are even greater than the contribution of ASF to climate change, while historically receiving significantly less attention.³⁷

The research further found that **combining 'better' production systems with 'less' consumption of ASF** would cut the hidden costs of ASF and support the EU's ambition to lower the environmental footprint of food and improve animal welfare, while simultaneously reducing numerous human health impacts.

³⁵ European Court of Auditors. [Transport of live animals in the EU: challenges and opportunities](#). April 2023.

³⁶ Impact Institute (2023). [External costs of Animal Sourced Food in the EU. Research](#) commissioned by Eurogroup for Animals.

³⁷ Both the external costs of production and consumption are likely underestimations due to several costs that either could not be quantified or were outside the scope of the research such as deforestation for pastures or feed crops and antimicrobial resistance stemming from overapplication of antibiotics in farm animals.

THE HIDDEN COSTS OF UNHEALTHY DIETS

Unhealthy diets are a leading cause of NCDs in the EU. NCDs such as cardiovascular diseases, certain cancers, diabetes, chronic respiratory diseases, liver diseases, obesity, and mental ill-health, are a major health burden of the 21st century.³⁸ Only these conditions represent 85% of the entire burden of diseases, and over 90% of all deaths in the EU.³⁹

In 2019, more than 814,000 premature deaths and over 14 million years of healthy life lost in the EU were attributed to unhealthy diets.^{40,41} Premature deaths account for a loss of €115 billion annually to the economy.⁴²

Moreover, overweight and obesity have reached epidemic proportions in Europe, with 60% of adults living with overweight or obesity. The effects on life expectancy, health expenditure and the labour market have been estimated to cut GDP by 3.3% in OECD countries.⁴³

1.2. Multibuy deals and supermarket promotional offers

Retailer price promotions play an important role in supermarket food environments and consumer purchases. From 'buy one get one free' price deals to in-store price discounts, there are several ways retailers can use price promotions to influence and guide consumers towards certain purchasing choices.

Volume promotions such as multibuy deals are a common form of price promotion which requires customers to purchase a certain number of items to get a better unit price. They can steer consumers towards less healthy, less sustainable choices but they can equally support consumers in buying healthy, sustainable foods such as fruit, vegetables, pulses, nuts and whole grains.



As an example of practices steering consumers towards less healthy and less sustainable choices, a Belgian supermarket offers two portions of pork and veal sausages at the price of one while a Portuguese retailer offers a large multibuy promotion of 6 for the price of 5 pastry packs.



³⁸ ECDA, EPHA, NCD Alliance. Towards an EU strategic framework for the prevention of NCDs (2019). <https://epha.org/joint-paper-i-towards-an-eu-strategic-framework-for-the-prevention-of-ncds/>

³⁹ Health Promotion and Disease Prevention Knowledge Gateway. EU burden from non-communicable diseases and key risk factors. Gateway European Commission. https://knowledge4policy.ec.europa.eu/health-promotion-knowledge-gateway/eu-burden-non-communicable-diseases-key-risk-factors_en

⁴⁰ Health Promotion and Disease Prevention Knowledge Gateway. EU burden from non-communicable diseases and key risk factors. European Commission

⁴¹ Institute for Health Metrics and Evaluation, University of Washington. GBD Compare, European Union, all sexes, all ages, all risk factors. Based on the Global Burden of Disease study.

⁴² OECD/EU. Health at a Glance: Europe 2016 – State of Health in the EU Cycle. OECD (2016) - https://ec.europa.eu/health/state-health-eu/health-glance-europe/health-glance-europe-2016_en.

⁴³ OECD. The Heavy Burden of Obesity (2019) - <https://doi.org/10.1787/67450d67-en>



By contrast, a Swedish supermarket advertises multibuy for beans on large billboards while a Dutch retailer offers 'pick and mix' promotion for fruit.



As the effects of the cost-of-living crisis continue to be felt, consumers are keenly interested in the various price promotions offered by retailers. However, unfortunately, supermarkets continue to have more promotions on *less healthy*, rather than more healthy food and drinks. A **2015 survey in the Netherlands found that 70% of promotions in supermarket leaflets were categorised as unhealthy**,⁴⁴ while a recent evaluation of over 15,000 food promotions featured in five of the largest Belgian retailers' promotional leaflets found that only one in ten were for fruit and vegetables while those for meat, both processed and fresh, featured twice as frequently.⁴⁵

WHEN SHRINKING SALES OF ORGANIC FOOD FOLLOW THE DROP IN PRICE PROMOTIONS



Research by Swedish consumer group Sveriges Konsumenter found that the number of retailer promotional offers for organic food decreased steadily in Sweden over 2017-2022. In 2022, there were less than half the number of promotions for organic compared to the peak year 2017 (whereas the total number of promotional offers remained stable). **A drop in sales of organic food has shortly followed the decrease in supermarkets' promotional offers**, and so has a drop in the supply of organic food – jeopardizing Sweden's target of 30% agricultural land under organic farming by 2030.

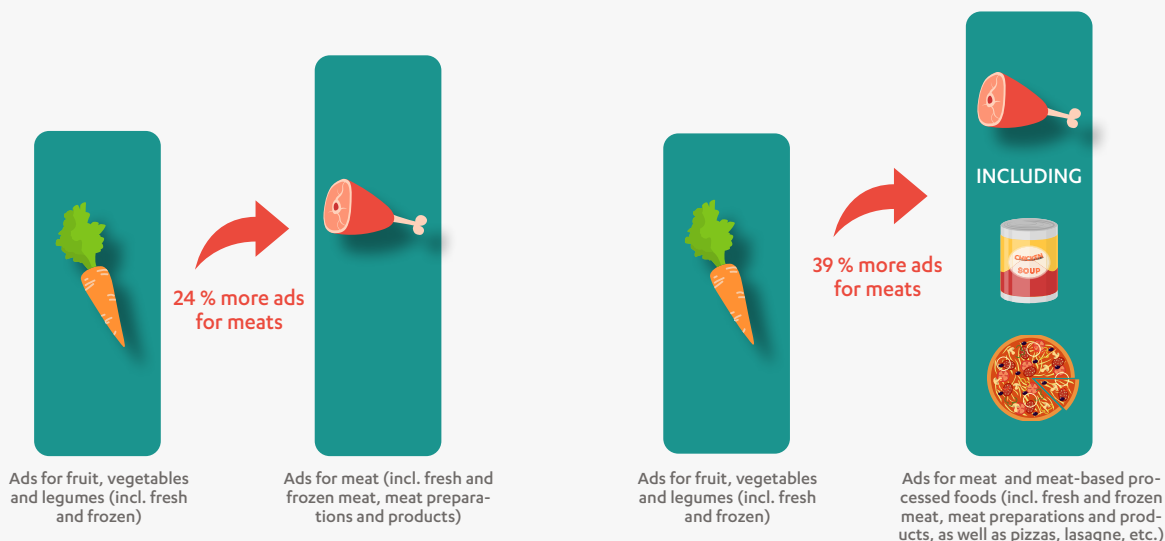
Supermarket promotional leaflets are only the 'tip of the iceberg', though. Retailers are increasingly moving away from mass promotions to engage in personalised offers targeting individual consumers based on their customer profile. Such customized marketing largely escapes monitoring and analysis by academic researchers.

⁴⁴ Ravensbergen EA, Waterlander WE, Kroeze W, Steenhuis IH. Healthy or Unhealthy on Sale? A cross-sectional study on the proportion of healthy and unhealthy foods promoted through flyer advertising by supermarkets in the Netherlands. *BMC Public Health*. 2015 May 6;15:470. doi: 10.1186/s12889-015-1748-8. PMID: 25943988; PMCID: PMC4492173.

⁴⁵ Vandevijvere, S., Van Dam, I. The nature of food promotions over one year in circulars from leading Belgian supermarket chains. *Arch Public Health* 79, 84 (2021). <https://doi.org/10.1186/s13690-021-00591-7>

A SNAPSHOT OF EU SUPERMARKETS' PROMOTIONAL FLYERS⁴⁶

Over the month of March 2023, we collected online the promotional flyers of 18 supermarket chains of various sizes and price ranges across 11 EU countries.⁴⁷ In total, we counted 10,641 individual promotional ads for food and drink products (incl. alcoholic beverages). Out of these, 1,623 ads were for meat (incl. fresh meat, meat preparations and products) – 1,815 if meat-based prepared foods such as lasagna, pizzas, ready-meals etc. were also included – and 1,306 were for fresh and minimally processed (e.g. frozen, canned) fruit, vegetables and legumes. **Compared to the number of promotional ads for fruit, vegetables and legumes, there were 24% more promotional ads for meat – 39% more if meat-based prepared foods were also included.**



Out of the promotional ads for meat, **less than 2% were for 'better' (organic) meat.** We came across a few private animal welfare labels (e.g. 'Beter Leven') and quality labels with an animal welfare component (e.g. Label Rouge) but did not include them because they are not harmonised at EU level. A few more ads were for meat carrying geographical indications (GIs) – yet GIs are not related to animal welfare. A higher number of promotional meat ads emphasised the (national) origin of the meat – however this is also no guarantee of higher animal welfare standards.



⁴⁶ Because of its limited duration (one month only), this snapshot assessment was not meant to be a comparative analysis of practices across supermarkets and/or countries. It only aimed at illustrating the difference in proportion of promotional ads for meat vs. for fruit, vegetables, and legumes.

⁴⁷ Austria (Hofer, Spar), Belgium (Delhaize, Lidl), France (E. Leclerc, Lidl, Super U), Germany (Rewe, Lidl), Italy (Conad, DeSpar/InterSpar), Luxembourg (Aldi, Match), the Netherlands (Jumbo, Albert Heijn), Poland (Kaufland, Netto), Romania (Carrefour, Kaufland), Spain (Aldi, Lidl, Dia) and Sweden (ICA Maxi, Stora Coop).



1.3. The role of governments in making healthy sustainable food more affordable

Through their fiscal policies and subsidies, governments can incentivise (or deter) the consumption of certain products by altering their relative price. While price incentives are widely supported by consumers, taxes are less popular.⁴⁸ Fiscal policies should apply to the entire food chain, from the farm to the fork, and not only to the final product.

Recently, some countries have implemented measures to support consumers through the cost-of-living crisis by making food staples more affordable. Spain, for example, has temporarily decreased the VAT for basic products such as fruit and vegetables, legumes, eggs, bread and milk from 4% to 0%, and from 10% to 5% for some products like pasta and vegetable oils. The VAT rate for meat and fish has remained unchanged. Portugal has also temporarily lowered VAT to 0% for “healthy essential foodstuffs”, including fruit and vegetables, oils, fish and meat.⁴⁹ At the same time, Portugal also introduced a special tax rate of 6% for plant-based butter, drinks and yoghurts, among other products and services.

A lowering of VAT to 0% for fruit, vegetables and pulses has been under discussion for some time in Germany – a move which consumer, environmental and social groups have called for to increase the affordability of healthy food.⁵⁰ The Netherlands has had similar discussions – likewise inconclusive so far.⁵¹

⁴⁸ BEUC, *One bite at a time: consumers and the transition to sustainable food, An analysis of a survey of European consumers on attitudes towards sustainable food*, June 2020.

⁴⁹ <https://dre.pt/dre/detalhe/lei/17-2023-211783460>

⁵⁰ <https://www.vzbv.de/pressemitteilungen/weniger-mehrwertsteuer-auf-obst-und-gemuese-fuer-klimaschutz-und-gesundheit>

⁵¹ <https://eenvandaag.avrotros.nl/item/is-het-nu-wel-of-niet-mogelijk-om-btw-op-groente-en-fruit-af-te-schaffen-volgens-wetenschappers-levert-het-veel-op/>

WHAT WE NEED:

- Eating healthy and sustainably should not be more expensive than not doing so. Food prices should send the right signal to consumers and support the shift to diets richer in fruit, vegetables, and pulses and with 'less and better' ASF.
- By adjusting their margin policy, retailers should close (if not reverse) the price gap between plant vs. animal-source foods as well as between organic and conventional products.
- Retailers should report annually on the ratio of their price promotions for:
 - healthy vs. unhealthy food (defined in accordance with independent, scientifically backed nutritional criteria such as the WHO nutrient profiles); and
 - organic food and 'better' ASF (either organic or any equivalent trustworthy animal welfare label) vs. conventional food and ASF.

HOW TO GET THERE:

- The FSFS should pave the way for the introduction of new requirements imposed on retailers, including:
 - An obligation for retailers' operations to have a demonstrable positive impact on the affordability of healthy and sustainable diets.
 - Restrictions on price promotions for unhealthy food and drink products. Despite a common belief that such restrictions are regressive, evidence shows that price promotions on unhealthy food and drink products push lower-income families towards diets that can harm their health, while costing them more money in the long-term.
 - When developing sustainability reporting standards for the wholesale trade and retail sector, the EU should introduce reporting requirements that allow users to assess the extent to which retailers' policies, such as price promotion practices, support the shift to healthy and sustainable diets.
- The FSFS should require Member States to develop National Food Plans to complement EU-level action. As part of these plans, governments should roll out measures (e.g. a lowering of VAT) to make healthy food such as fruit, vegetables and legumes affordable to consumers.

2 How the shopping environment influences what goes into your basket

Today, most Europeans buy their groceries in supermarkets and convenience stores (whether in brick-and-mortar shops or online through pick-and-collect and delivery services). Food retail is often the first and main entry point for consumers making purchasing decisions and has a major influence on consumers' shopping baskets through various factors such as the availability and range of products on offer, the store layout, the location of products in the shop, the sourcing policies and more.

The WHO acknowledges the role of retail environments in shaping the global obesity pandemic and the fact that "unhealthy foods have become more available, more affordable, more acceptable and more heavily promoted through retail food environments such as supermarkets, convenience stores and fast-food outlets."⁵²

⁵² WHO European Regional Obesity Report 2022. Copenhagen: WHO Regional Office for Europe; 2022. Licence: CC BY-NC-SA 3.0 IGO

2.1. What you find is what you buy

The 'Superlijst' project, which has been carried out in four European countries so far,⁵³ investigated **how supermarkets help consumers to shop in a healthy, sustainable, animal-friendly, and fair way – and the results show they could do much more.**⁵⁴

In Belgium, the 'Superlijst'⁵⁵ report revealed that supermarkets are currently contributing little to making food systems more sustainable. For instance, the research found that two in three ready meals sold in Belgian supermarkets contain meat or fish, and only 4% are fully plant-based. It also found that ready-to-prepare meat products such as sausages and hamburgers are often sold in (too) big portions (over 100 or even 150g).

Similar research was conducted in France by Réseau Action Climat (RAC),⁵⁶ which concluded that French supermarkets do not help consumers make sustainable choices. Out of the eight French supermarket chains analysed, none achieved a higher score than 10/20 for their efforts in supporting consumers in transitioning to healthier and more sustainable diets. Other findings from the RAC's investigation include the fact that 92% of ready-made meals contain meat or fish; less than 10% of promoted minced meat and chicken are organic; and none of the supermarkets analysed has any measures in place to stop the promotion of industrially produced meat.⁵⁷

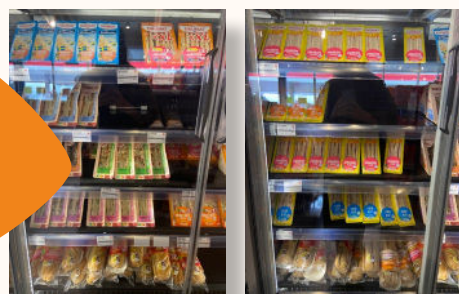
Moreover, depending on where they live and shop for groceries, consumers have unequal access to a wide range of foods, including healthy options at an affordable price. In the UK, research by the consumer organisation Which? found that the availability of budget basic groceries varies across stores. While it was generally good in large stores, shoppers using supermarket-branded convenience stores would almost never be able to buy the budget-line items.⁵⁸ Of note, previous research by the British consumer group found that it is often the poorest people who rely on convenience stores the most (e.g. because of mobility issues, lack of access to a car or poor access to public transport).



Some supermarkets have announced plans to increase the amount of plant source foods they offer. In Germany, the large supermarket chain Lidl has announced they will "continuously increase" their plant-based range by 2025 and beyond, and feature more and more plant-based alternatives in their weekly promotions, citing environmental reasons and the growing number of consumers following special diets.⁵⁹ In the Netherlands, the retailer Jumbo has committed to rebalancing its offer in plant vs. animal source foods by 2030.⁶⁰



Looking for a sandwich, but preferably without meat or fish? Sadly, you do not have many options left at this store in France. Will you find it?



⁵³ The Netherlands, Sweden, the UK and Belgium.

⁵⁴ Partners involved in the Belgian 'Superlijst' project included a.o. the NGO [Rikolto](#), BEUC member [Test Achats/Test Aankoop](#), the [Questionmark](#) Foundation, and several Belgian environmental organisations.

⁵⁵ <https://www.superlijst.be/#resultaten>

⁵⁶ https://reseauactionclimat.org/wp-content/uploads/2023/01/rac_gdedistri_rapport06-email.pdf

⁵⁷ *ibid.*

⁵⁸ <https://www.which.co.uk/news/article/supermarkets-fail-to-make-cheaper-food-ranges-available-to-most-at-risk-shoppers-az9sx1n2sJY9>

⁵⁹ [Lidl announces plans to reduce animal-based products in store](#)

⁶⁰ <https://www.rtlnieuws.nl/nieuws/nederland/artikel/5368448/vleesvervangers-naast-het-vlees-jumbo-twello>

2.2. Eye level is buy level: product placement and in-store navigation

The psychology of consumer behaviour at different stages, e.g. pre- and in-store influences, in supermarkets and other retail spaces has been thoroughly studied, and behaviour-based strategies are widely applied to steer consumers towards certain products.⁶¹

Consumer research has found that around 50% of shoppers are flexible with their shopping plans, so opportunities to influence buying decisions in-store are widely used.⁶² This includes in-store messaging and displays to encourage purchases, particularly to influence those shoppers who do not have a clear idea of what they want to buy before they enter the shop.

The physical layout of a grocery store is one of the main factors that influence consumers' purchasing decisions, often guiding consumers to certain types of products. This includes highlighting certain products on promotional shelves (e.g., end-of-aisle promotional displays), guiding consumers with signs and colours, as well as featuring more expensive products at adults' eye level, and cheaper own-brand products and products marketed to children at lower eye level.

Stores' physical layout can incentivise the purchase of unhealthy and unsustainable products such as HFSS foods. Large displays in prominent locations in the store attract consumers' attention and stimulate a purchase.⁶³ Stores' layout can also discourage the purchase of healthier and more sustainable products, if placed at less prominent locations.



As you enter these supermarkets in Germany and the UK, you will have a hard time escaping the large display of crisps on discount or the Coca-Cola truck made from cardboard located at the entrance of the store



In a large Italian supermarket, plant-based ice cream is available in 1 out of the 10 freezers and located in the very back of the aisle, making it practically invisible for anyone who does not specifically go out of their way to search for it.



⁶¹ e.g. Cil, I. (2012). Consumption universes-based supermarket layout through association rule mining and multidimensional scaling. *Expert Systems with Applications*, 39(10), 8611-8625.

⁶² [Research commissioned by the UK Agriculture Horticulture Development Board \(AHDB\)](#) outlines the decision-making process of shoppers when buying meat. For instance, it advises that messaging placed throughout the store and displays inspiring meals in different aisles can encourage a meat purchase in the store.

⁶³ A [UK experiment](#) during the run-up to Easter showed that the "removal of chocolate confectionary from prominent locations was associated with reduced purchases of these products, of sufficient magnitude to observe a reduction in the energy content of total food purchases"



Dry legumes are displayed at the entrance of a supermarket in Italy.



In a Danish supermarket, a large display of oat milk was found at the entrance of the shop, placed in a high visibility area and offering a price promotion.



WHAT WE NEED:

- Wherever they shop, consumers should have easy access to a wide and attractive range of healthy and sustainable foods.
- Retailers should improve the availability, positioning, and appeal of healthy and sustainable foods, and ultimately commit to increasing their sales. Conversely, they should reduce the availability, prominence, and sales of unhealthy and unsustainable foods.

HOW TO GET THERE:

- Following the UK's lead, the FSFS should pave the way for subsequent measures restricting the placement in retail stores and their online equivalents of certain food and drink products. This would ensure that the retail environment better aligns with healthy and sustainable eating guidelines. For instance, HFSS foods should be banned at supermarket check-out.
- As part of their National Food Plans, governments should set targets for increasing the proportion of supermarket sales from healthy and sustainable foods (including 'better' ASF) at national level. Such targets could be aspirational in a first stage, but faced with a lack of progress from retailers, governments should consider making them binding.

3 Close-up on the out-of-home sector

3.1 The struggle of eating healthy and sustainably when dining out

The out-of-home sector includes all outlets where food and drinks can be purchased and consumed outside the home. From restaurants, bars and cafes, to takeaways, street-food trucks and fast-food outlets, as well as concessionary outlets in entertainment venues such as the cinema or sports, the opportunities to consume food away from home are numerous. The out-of-home sector thus has the potential to play an important role in shaping food environments that incentivise healthy sustainable consumption, or conversely, stimulate unhealthy and unsustainable consumption patterns.

In recent years, the proportion of the energy intake from food and drinks consumed by Europeans when eating out has significantly increased, while the market continues to rapidly expand. In the UK for example, authorities estimate that a quarter of all calories consumed are done so out-of-home, while in Spain, over a third of food expenditure is done so in the sector.⁶⁴ At the same time, **food sold and consumed out of the home is often higher in saturated fats, sugar and salt while portions tend to be substantially larger than retail equivalents**⁶⁵, which can lead to unhealthy dietary patterns, a risk factor for NCDs.⁶⁶ Research shows that when purchasing food in the out-of-home sector, people tend to consume, on average, **200 more calories per day than if they eat homemade meals.**⁶⁷

Strikingly, while consumers from lower socio-economic groups tend to be the most at risk of becoming overweight or obese, **out-of-home food environments tend to be the unhealthiest in the most deprived areas.** In England for example, fast food outlets are five times more likely to be found in the poorest areas compared to the most affluent.⁶⁸

A recent study in Flanders found that, not only was there a significant increase in unhealthy out-of-home outlets near all schools between 2008 and 2020 (more fast-food outlets for example), but that schools with a higher proportion of children from lower-socio-economic backgrounds had unhealthier food environments than the schools with more children from higher-income households.⁶⁹ A similar study in Spain showed that, while the vast majority (94%) of schools in Madrid had an unhealthy food outlet within 400 metres, schools located in more disadvantaged areas were associated with greater counts of such outlets.⁷⁰

In a survey on improving the out-of-home food environment run by Food Standards Scotland, almost all respondents (95%) agreed that **consumers should be able to access small or half portions when eating out**, and 68% were in favour of **mandatory calorie labelling**. Similarly, 81% agreed that a range of actions should be adopted by the public sector to support healthy eating out-of-home.⁷¹



⁶⁴ Mandating Calorie Labelling in the Out-of-Home Sector: Government Response to Public Consultation, UK Department of Health and Social Care, July 2020.

⁶⁵ The out-of-home food environment: report of a WHO Regional Office for Europe and Public Health England expert meeting, 10 June 2021. Copenhagen: WHO Regional Office for Europe; 2022. Licence: CC BY-NC-SA 3.0 IGO.

⁶⁶ <https://apps.who.int/iris/handle/10665/350121?locale-attribute=fr&>

⁶⁷ Nguyen, B.T., Powell L.M. The impact of restaurant consumption among US adults: effects on energy and nutrient intakes. *Public Health Nutrition*. 2014; 17: 2445-2452.

⁶⁸ <https://www.gov.uk/government/news/englands-poorest-areas-are-fast-food-hotspots>

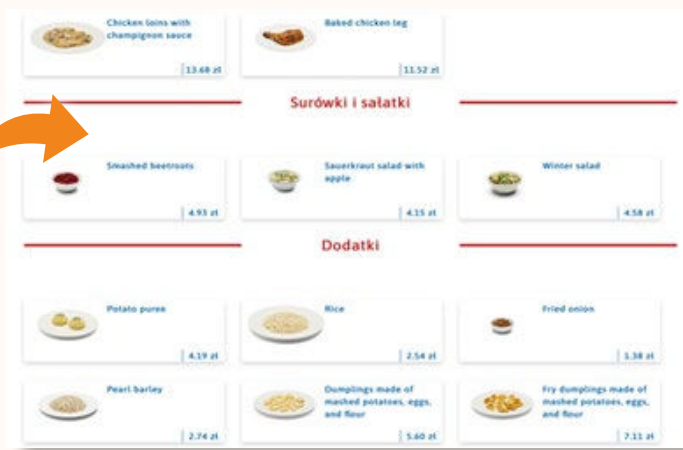
⁶⁹ Smets, V., Vandevijvere, S. Changes in retail food environments around schools over 12 years and associations with overweight and obesity among children and adolescents in Flanders, Belgium. *BMC Public Health* 22, 1570 (2022). <https://doi.org/10.1186/s12889-022-13970-8>

⁷⁰ Díez, J.; Cebrecos, A.; Rapela, A.; Borrell, L.N.; Bilal, U.; Franco, M. Socioeconomic Inequalities in the Retail Food Environment around Schools in a Southern European Context. *Nutrients* 2019, 11, 1511. <https://doi.org/10.3390/nu11071511>.

⁷¹ https://www.foodstandards.gov.scot/downloads/FSS_OOH_Consultation_analysis_report.pdf



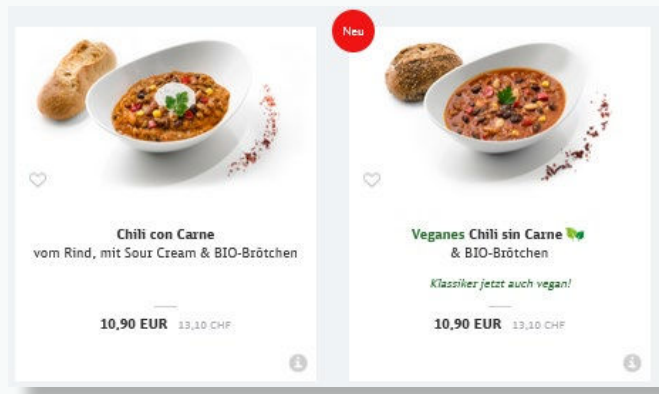
In Poland, ‘bary mleczne’, or milk bars, are canteens that are partly subsidised by the government. The menus are often based on (processed) meat and dairy and offer few healthy plant-based options, such as pulses and vegetables. Here the menu of such a milk bar: both main courses are meat-based, the only plant-based options are side dishes.



While restaurants could stimulate healthy, sustainable eating, this Danish restaurant clearly incentivises the overconsumption of meat with an ‘all you can eat’ offer for fried pork belly with parsley sauce.



Deutsche Bahn, the German national train company, shows in its onboard restaurants that it is possible to incentivise healthy sustainable consumption by offering a variety of plant-based dishes at the same price as their meat equivalents. In March 2022, Deutsche Bahn announced that more than 50% of the dishes offered will be vegetarian or vegan.



Fast food chains are very popular with children and young people. Yet, research carried out by French consumer group CLCV found that children’s favourite fast food menus are too energy-dense and too rich in fat and salt.⁷² **Their nutritional composition has even worsened over time, CLCV noted, and ‘super-size’ menus – popular with adolescents – continue to be offered**, including some which provide as many as 1,800 calories, which is close to 80% of an adult’s daily energy needs. Whereas a few ‘light’ menu options are available and have acceptable nutritional composition and calorie content, these are not the ones most frequently ordered and consumed by children and young people.

⁷² <https://www.clcv.org/alimentation/enquete-menus-enfants-dans-les-fast-foods-trop-de-calories-et-peu-dinformation-nutritionnelle>



3.2. Meal delivery apps: unhealthy, unsustainable food only a click away

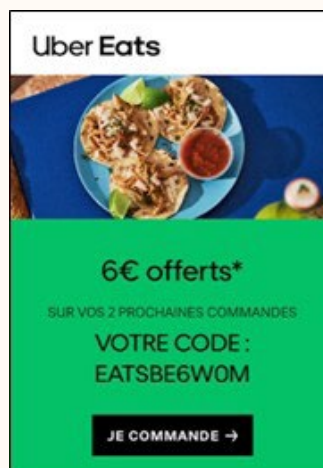
In recent years, **meal delivery app services have become very popular and are now a significant component of digital food environments, especially in major urban areas.** These online delivery web-based applications allow users to place orders from fast food outlets, restaurants and even convenience shops. The rapid rise in consumer use has been consolidated by the COVID-19 pandemic as physical out-of-home outlets became unavailable to customers.⁷³

While the convenience of these apps makes them attractive to many consumers, **there are concerns that meal delivery platforms are making unhealthy and less sustainable foods more accessible.** Although evidence of the impact of increased use of meal delivery apps on public health is still lacking, the emerging evidence supports calls for surveillance and more research to investigate the link between these apps and people's diets.⁷⁴ For instance, a study carried out in Australia and New Zealand found that nearly all (over 90%) of food options or outlets with the 'healthy' tag on the Uber Eats delivery app were actually classified as unhealthy according to an independent scoring system.⁷⁵

A recent study in the UK found that **altering food delivery apps to include pre-selecting smaller portions, positioning lower-calorie foods more prominently and displaying calorie labels could reduce the number of calories purchased by up to 15%.**⁷⁶



Push notifications on your smartphone, promotional offers and discounts are a common feature of meal delivery apps. Are you willing to recommend the app to a friend so that they start using the service? You get an extra discount! Meal delivery apps collect significant amounts of user data for targeted offline and online advertising. Many advertisements upsell unhealthy options as they are more likely to be classified as 'most popular' on meal delivery apps.



⁷³ Slide to order: a food systems approach to meals delivery apps: WHO European Office for the Prevention and Control of Noncommunicable diseases. Copenhagen: WHO Regional Office for Europe; 2021. Licence: CC BY-NC-SA 3.0 IGO.

⁷⁴ *ibid.*

⁷⁵ Partridge, S.R.; Gibson, A.A.; Roy, R.; Malloy, J.A.; Raeside, R.; Jia, S.S.; Singleton, A.C.; Mandoh, M.; Todd, A.R.; Wang, T.; Halim, N.K.; Hyun, K.; Redfern, J. Junk Food on Demand: A Cross-Sectional Analysis of the Nutritional Quality of Popular Online Food Delivery Outlets in Australia and New Zealand. *Nutrients* 2020, 12, 3107. <https://doi.org/10.3390/nu12103107>.

⁷⁶ Bianchi, F. et al. (2022) Reordering food options on delivery apps could help to reduce obesity. rep. Available at: https://media.nesta.org.uk/documents/Nesta_BIT_AHL_Food_delivery_apps_July_2022_Final_pdf_aWtrcHp.pdf.



Meal delivery platforms often partner with fast food chains and food companies to offer exclusive deals – generally for unhealthy food. Here, the fast food chain Quick and Coca-Cola have partnered with Uber Eats and Deliveroo to offer free items to customers purchasing above a certain amount via the platforms.



WHAT WE NEED:

- Food and beverage service chains and meal delivery platforms should ensure that healthy and sustainable options are widely available, affordable, and appealing to consumers, especially the younger ones, including by harnessing the power of marketing and advertising.
- There should be more publicly-funded research to further investigate the link between the nutritional quality and sustainability of food available in the out-of-home sector – and on meal delivery apps in particular – and Europeans' nutritional status and food consumption footprint.

HOW TO GET THERE:

- The FSFS should pave the way for the introduction of new requirements imposed on food and beverage service chains and meal delivery platforms, including regarding:
 - The provision of calorie information on menus (physically and online). As new requirements on information to consumers regarding the environmental impact of food and the method of production for animal products are being introduced in EU legislation, their extension to the out-of-home sector should be considered as well (both physical outlets and online meal delivery apps).
 - The alignment of their offer with healthy and sustainable eating guidelines – including the shift to more plant-based diets with 'less and better' ASF and the provision of healthy portion sizes (as opposed to 'XL', 'Maxi' and other 'Giant' menu options).
 - The use of commercial practices such as loyalty points, vouchers, and social media offers to support healthy and sustainable choices by consumers – as opposed to steering them towards less healthy, less sustainable options.

4 The influence of marketing

4.1. The endless array of food companies' marketing tactics

As consumers, we are heavily exposed in our daily life to many different forms of food marketing from a young age. From ads on TV, billboards, bus stops, radio and print media to sponsorship of sports events, branded games and competitions online, endorsements by celebrities or influencers on social media, it is almost impossible to avoid exposure to such marketing.

A large body of scientific research shows this exposure, coupled with the powerful techniques used by advertisers, can have a **significant impact on food preferences and consumption patterns, especially in children**. According to the World Health Organization, there is **'unequivocal evidence' that childhood obesity is influenced by the marketing of foods which are high in fat, salt, and sugar**.⁷⁷ The 'advertised diet' bears little resemblance to the recommended diet, and the foods which appear in ads, especially those which are targeting children, are predominantly ones that contribute to unhealthy diets.^{78,79}

It only takes a short stroll outside to be exposed to billboard ads promoting burgers, pizzas, and soft drinks. Studies conducted in the UK have found that **most food-related ads on street billboards were for less healthy food and fast-food products**.⁸⁰ There is evidence that outdoor advertising exposure is related to consumption of unhealthy food and drinks, yet the understanding of its actual impacts has been insufficiently researched and established (unlike for food marketing on TV and digital media), which prevents policy progress in this area.⁸¹



While parents do their best to teach their children healthy eating habits, this is what many children keep seeing on their daily walk to school.



⁷⁷ World Health Organization. Regional Office for Europe. (2016). Tackling food marketing to children in a digital world: trans-disciplinary perspectives: children's rights, evidence of impact, methodological challenges, regulatory options and policy implications for the WHO European Region. World Health Organization. Regional Office for Europe. <https://apps.who.int/iris/handle/10665/344003>.

⁷⁸ E.g. BEUC member OCU found that 89% of products marketed towards children get a Nutri-Score rating of D or E (89%): OCU, '[Empacho de anuncios: Alimentos no saludables para niños](#)', OCU Salud, June 2021. Likewise, BEUC member Test Achats/Test Aankoop found that biscuits and chocolates represented over 60% of food ads alone: Test Achats/Test Aankoop, Publicité envers les enfants : le laxisme règne, September 2021

⁷⁹ Food marketing exposure and power and their associations with food-related attitudes, beliefs and behaviours: a narrative review. Geneva: World Health Organization; 2022. Licence: CC BY-NC-SA 3.0 IGO.

⁸⁰ <https://obesityhealthalliance.org.uk/2021/12/07/outdoor-advertising-a-major-loop-hole-in-food-marketing-restrictions/>

⁸¹ Finlay A., Robinson E., Jones A., Maden M., Cerny C., Muc M., Evans R., Makin H., Boyland E. A scoping review of outdoor food marketing: exposure, power and impacts on eating behaviour and health. BMC Public Health. 2022 Jul 27;22(1):1431. doi: 10.1186/s12889-022-13784-8. PMID: 35896996; PMCID: PMC9330687.



An interesting initiative has been the 2019 Transport for London’s (TfL) ban on ‘junk’ food (i.e. HFSS products) advertising across all TfL-owned modes of transport such as underground, buses, taxis and TfL-owned roadside advertising sites. A study has shown that three years in, the ban has contributed to a 1,000 calorie (6.7%) decrease in unhealthy purchases in people’s weekly shopping. It suggests “considerable potential health and economic gains” following the ban.⁸²



Credit: sustain UK

The Dutch city of Haarlem has announced plans to ban meat advertising on bus shelters, billboards, and pillars, due to meat’s major climate impact. The ban might take effect from 2024 provided any legal hurdles are cleared. If it can eventually apply, Haarlem would be the first city in the world with such a ban.⁸³



Opdrachtgever: La Vie | Bureau: Fitzroy | Media: JC Decaux

Marketing can also take the form of **sponsorship, which is widely used for sports events** – mostly to promote unhealthy food.⁸⁴ Although it contributes to the obesogenic environment, such sponsorship remains largely unregulated. And it is not only beverage and unhealthy food companies that are frequently sponsoring events and sports clubs, but also other companies selling products Europeans should consume less of, such as meat.



In France, Charal, a subsidiary of the big meat producer Bigard, is sponsoring the skipper Jérémie Beyou. The company has justified this partnership by a “need to speak positively about meat by highlighting values such as vitality and strength, and on the other hand, to get closer to [their] customers.”⁸⁵ Thanks to this partnership, Charal was also able to address young people via its special Vendée Globe educational kit, which was downloaded 11,000 times and of which 8,000 copies were distributed in schools.⁸⁶



⁸² Thomas, C., Breeze, P., Cummins, S. et al. The health, cost and equity impacts of restrictions on the advertisement of high fat, salt and sugar products across the transport for London network: a health economic modelling study. *Int J Behav Nutr Phys Act* 19, 93 (2022). <https://doi.org/10.1186/s12966-022-01331-y>

⁸³ <https://www.vrt.be/vrtnws/nl/2022/09/07/ophef-in-haarlem-omdat-stad-vleesreclame-wil-verbieden-voor-het/>

⁸⁴ Ireland R, Boyland E. Sports sponsorship and young people: good or bad for health? *BMJ Paediatr Open*. 2019 Jun 29;3(1):e000446. doi: 10.1136/bmjpo-2019-000446. PMID: 31338427; PMCID: PMC6613843.

⁸⁵ <https://www.boatsnews.com/story/25706/a-new-sponsor-and-a-new-boat-for-jeremie-beyou>

⁸⁶ <https://www.sponsoring.fr/sponsoring/charal-continue-avec-jeremie-beyou-jusqu'en-2026-438142.shtm>



An Italian meat producer is the official supplier for the Italian Rugby Federation. Their poster, which reads “the good meat team”, associates meat with physical fitness and health and thus encourages consumption.



New means of targeting consumers through **digital food marketing** are increasingly dominant and can have significant relevance for the target audience using personal data such as gender, age, purchasing history and browsing history.⁸⁷ From influencers and celebrities promoting dairy and meat on their social media profiles to advergames for crisps targeting children, digital marketing techniques are often simultaneously more subtle than traditional advertising while being more immersive and engaging.

Despite the large body of evidence showing that consumers, and **especially children, continue to be massively exposed to unhealthy food marketing, authorities have been slow to take action to protect minors** from these major influences, whether online or offline. Instead, the EU and most Member States have relied on **self-regulatory** approaches, whereby food companies themselves devise voluntary rules – called the ‘EU Pledge’. An evaluation of the ‘EU Pledge’ carried out by BEUC highlighted **significant shortcomings**, including weak nutrition criteria that still permit HFSS foods to be marketed to children as well as rules that are ill-suited to cover all TV programmes watched by children and address the world of digital marketing.⁸⁸

A coalition of European health, consumer, child, and family organisations, including EPHA and BEUC, has called on the EU to tackle the exposure of young people to the marketing of nutritionally poor food. The coalition has put forward a blueprint Directive presenting how the EU could use its powers to regulate health-harmful marketing to children.⁸⁹



In January 2023, German retailer Lidl announced EU-wide plans to stop marketing directed at children for any foods that are high in fat, sugar, or salt according to the WHO nutrient profiling criteria.⁹⁰ By the end of 2025, for its own-brand products, Lidl also wants to sell only those food and drink products in packaging attractive to children that meet the WHO criteria.



⁸⁷ See trends in media use (among children), marketing methods in the new digital media landscape: WHO (2016) [Tackling food marketing to children in a digital world: trans-disciplinary perspectives](#)

⁸⁸ BEUC (2021). [Food marketing to children needs rules with teeth: a snapshot report about how self-regulation fails to prevent unhealthy food to be marketed to children.](#)

⁸⁹ <https://epha.org/campaigns/regulate-food-marketing/>

⁹⁰ <https://www.sueddeutsche.de/wirtschaft/einzelhandel-lidl-keine-werbung-mehr-fuer-ungesunde-kindernahrung-dpa.urn-newsml-dpa-com-20090101-230110-99-168893>

WHAT WE NEED:

- In a favourable food environment, food marketing should seek to incentivise healthy and sustainable, rather than unhealthy and unsustainable, eating habits.
- Whether they watch TV, use social media, attend sports events, or walk to school, children (under 18) should no longer be exposed to nutritionally poor food marketing.

HOW TO GET THERE:

- The FSFS should pave the way for the EU to regulate the cross-border marketing of food and minimise the exposure of children (under 18) to nutritionally poor food marketing by:
 - ending the marketing of such food between 6am and 11pm on broadcast media, including television and radio;
 - ending the marketing of such food on digital media, including social media and video sharing platforms;
 - ending the sponsorship by food brands of events with cross-border effects, including sports and cultural events, such as festivals, unless brands can prove that such sponsorship is not associated with nutritionally poor food; and
 - ending the use of marketing techniques appealing to children for the promotion of nutritionally poor food, including on food packages. Influencers and other personalities shall not promote nutritionally poor food.

The definition of nutritionally poor food should be based on the WHO Europe nutrient profiling model.

- Cities and public transport companies should consider enacting restrictions on the outdoor advertising of foods, the consumption of which should not be encouraged – for health and/or sustainability reasons.

4.2. When taxpayers' money is funding meat ads

The EU supports campaigns to promote agrifood products both at home and abroad through its EU promotion policy with a budget of EUR 185.9 million in 2023.⁹¹ The EU promotion policy aims at “enhancing the competitiveness or the Union’s agricultural sector”, as well as to “increase the competitiveness and consumption of the Union’s agricultural products”.⁹²

The EU promotion policy is up for review by the European Commission, with a view to better aligning it with the Farm to Fork Strategy and Europe’s Beating Cancer Plan⁹³ – both of which highlight the need to shift to more plant-based diets. But despite being announced for early 2022,⁹⁴ the proposal has not yet been published.

Concerns have been raised that **the EU continues to spend significant amounts of money to encourage the consumption (and hence, production) of products – such as red meat – which Europeans are eating in excess.** According to the European Commission’s own data, between 2016 and 2019, 24% of the EU agricultural promotion policy budget were allocated to campaigns promoting meat and meat products.⁹⁵

⁹¹ [EC Promotion of EU farm products](#)

⁹² [REGULATION \(EU\) No 1144/2014](#)

⁹³ European Commission, [Europe’s Beating Cancer Plan](#).

⁹⁴ [Initiative EU farm and food products – review of policy on promotion inside and outside the EU](#)

⁹⁵ [https://www.europarl.europa.eu/RegData/questions/reponses_qe/2020/001576/P9_RE\(2020\)001576_EN.pdf](https://www.europarl.europa.eu/RegData/questions/reponses_qe/2020/001576/P9_RE(2020)001576_EN.pdf)

Since 2014, the EU has funded multiple campaigns promoting meat and dairy consumption,⁹⁶ including ‘Become a Beefatarian’ supported with nearly €3.6 million. The campaign received considerable criticism – including from Members of the European Parliaments⁹⁷ – for contradicting scientific recommendations on the environmental, climate and health impacts of red meat consumption and undermining the Farm to Fork Strategy and Europe’s Beating Cancer Plan.

While young adults in several European countries tend to eat less meat in line with healthy and sustainable eating recommendations, **several of the EU-funded promotion campaigns have specifically targeted this group of consumers** with a view to reversing this trend – such as the ‘Love Pork’ campaign run in Denmark and Sweden over 2018-2021.⁹⁸



Love Pork



A European movement for more taste

The action targets the Danish and Swedish markets for pork. The sector is significantly challenged by low and continuous declining consumption of pork especially amongst young consumers aged 18-29. Increased consumption of pork on the two markets will have a positive impact on the European pig meat industry. Pork is no longer a natural part of the young Scandinavians' diet. They tend to eat less meat in general and to avoid pork in particular. The objective is to increase consumer demand and thereby halt an otherwise forecasted continued decline. By maintaining current levels of penetration and spending, the action will effectively increase penetration with up till 19.7 pct and spending with 30 pct on the target markets. The target group perceives pork as neither trendy nor tasty. To support the objective of increased demand, the action will work to raise the product profile and improve the attractiveness of the product category by means of an innovation seminar for the meat processing industry and retail. The objective is to introduce a total of 40 new pork products or meal concepts in retail for the target group. To reach and convince a complex target group of young consumers, the creative element of the action is to create a consumer movement driven by a group of social media role models with a view to re-establish pork in northern food and eventually throughout Europe. A primary communication tool will be influencer marketing, and the action will rely on

Budget(s):	
Proposing country:	Denmark
Campaign budget:	3 063 957,20 €
EU contribution:	2 451 165,76 €
Proposing country:	Sweden
Campaign budget:	121 868,00 €
EU contribution:	97 254,40 €

There is strong public demand for public money to go towards the promotion of healthier, more sustainable options. The vast majority (79%) of EU citizens who responded to the open public consultation on the EU promotion policy review said they want it to only promote EU agri-food products and quality schemes which are aligned with healthy, sustainable diets.⁹⁹ **Citizens expressed “strong support for shifting the focus of the policy towards promoting more plant-based diets by removing at least meat** and, to a lesser extent, other animal products from the range of products eligible to benefit from the policy”.¹⁰⁰

In recent years, the European Commission has strived to align the promotion policy a bit more closely with the Farm to Fork Strategy’s objectives, such as the sustainability of EU agriculture and promoting the consumption of fresh fruit and vegetables. However, the **lack of an agreed definition for ‘sustainable agriculture’ leaves room for some greenwashing.**



A visual from the ‘Duurzame Belgische zuivel’ campaign, supported by the EU supposedly to promote sustainably produced milk, proudly claims that two in three Belgians *think* that farmers produce milk in a climate-friendly way. While this is not backed by any evidence (except from a *perception* of consumers), this visual cleverly (and misleadingly) gives the impression that the Belgian milk sector – regardless of the type of production system considered – is sustainable.



⁹⁶ See a range of campaigns [here](#)

⁹⁷ <https://www.politico.eu/article/become-a-beefatarian-meps-slam-brussels-campaign-promote-meat/>

⁹⁸ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/opportunities/projects-details/31072773/825384/AGRIP>

⁹⁹ https://agriculture.ec.europa.eu/system/files/2021-07/preliminary-results-public-consultation-giulia-martino_0.pdf

¹⁰⁰ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12782-Information-and-promotion-measures-for-agricultural-and-food-products-in-the-internal-market-and-in-non-EU-countries/public-consultation_en

WHAT WE NEED:

- EU funds for the promotion of agricultural products need to move away from products Europeans should consume less of (incl. meat, but also alcoholic beverages) to those we should eat more of (fruit, vegetables, wholegrains, pulses and more).

HOW TO GET THERE:

- The review of the EU promotion policy must ensure it is fully aligned with the Farm to Fork Strategy and Europe's Beating Cancer Plan through the introduction of new conditionality requirements and eligibility criteria.

5 Public procurement: Leading by example

Healthy and sustainable public food procurement and service policies have untapped potential to support dietary shifts. Public settings, such as government offices, schools, childcare facilities, nursing homes, hospitals and canteens can play a key role in ensuring people are provided with nutritious, safe, healthy, and sustainably produced food. Too often, however, meals and snacks in these settings do not align with healthy and sustainable eating recommendations.

Public procurement is seen as one of the main levers for food system transformation, as it can influence both consumption and production patterns. Healthy and sustainable public procurement can stimulate the supply of nutritious food by creating large-scale predictable demand and making production more economically viable. It can shape eating habits and shift demand and consumption patterns towards healthier food and improve access of at-risk groups to healthy diets while supporting vulnerable actors such as small-scale producers.¹⁰¹

Depending on the policy measures, public procurement could determine what kind of food will be purchased (e.g. local, healthy), from whom it will be purchased (e.g. from local or smallholder farms), and from what type of production it will be purchased (e.g. organic and 'better' ASF).

A group of civil society organisations working in the context of the EU Food Policy Coalition has published a policy paper on the benefits of implementing sustainable food procurement,¹⁰² as well as a Farm to Fork Procurement Manifesto,¹⁰³ including seven mandatory (minimum) and optional criteria for public canteens. These include the procurement of healthy food from organic or agroecological farming; the support of small-scale producers; the lowering of the climate impact through more plant-based meals and the reduction of food waste; the consideration of social and labour rights, as well as fair trade and animal welfare standards.

¹⁰¹ <https://www.who.int/news/item/15-07-2022-the-untapped-potential-of-healthy-public-food-procurement-and-service-policies-to-support-the-repurposing-of-food-and-agricultural-policies-for-delivery-of-affordable-healthy-diets>

¹⁰² https://foodpolicycoalition.eu/wp-content/uploads/2021/06/Sustainable-public-procurement-of-food-a-goal-within-reach_EU-FPC-website.pdf

¹⁰³ https://foodpolicycoalition.eu/wp-content/uploads/2023/01/Manifesto-for-establishing-Minimum-Standards-for-Public-Canteens-across-the-EU_final.pdf



A German high school canteen offers three menu options every day: one meat-based dish (beef, chicken, or fish), one vegetarian dish and a 'low-allergen' dish (gluten free and vegan). All dishes are organic, and two out of three are vegetarian/vegan.



Speiseplan Grundschule "SISS Primary" Mensa "Funky Food" "Mensa Oase"		NOWCOOK catering solutions			
KW 11	13.03.2023	14.03.2023	15.03.2023	16.03.2023	17.03.2023
Menu 1 fleischlich Hochwertig/Sokal vegt.	Pasta mit zureicher Käsesauce und Nudelschinken dazu Nudeln Parmesan (2,3,7,8)	Hühnerbraten und Aalschilde in Tomatensauce mit Nudeln (8,11)	Hähnchen mit Apfel-Pfirsich- kompott (7,8)	Currywurst (Hähnchen) mit Dip und Ofenkartoffeln (2,3,7)	Hähnchen-Eintopf mit Zwiebelsauce, Ingwer und Kartoffeln dazu Kartoffelbraten (2,7)
Menu 2 vegetarisch Hochwertig/Sokal vegt.	Pasta mit zureicher Käsesauce dazu Nudeln Parmesan (2,3,7,8)	Gelbes Kornbrei mit Käsesauce dazu Nudeln (8,11)	Vegetarisches Filet-Knollen mit Dunkel- und Protein- dazu Gute Protein (7)	Spezial-Bratling mit Käse- Quark und Ofenkartoffeln (2,3,7)	Kartoffelbraten mit Kartoffel und Käse Kartoffelbraten (2,7)
Menu 3 Allergene	Kornbrot (7)	Milchreis mit Sonnenschein und Dressing	Waldbeeren (7)	Paprika-Milch-Salat	Buttermilch-Kartoffel- Creme (7,8)
Menu 3 Allergene	Ganzkörner Nudeln mit Käsesauce	Waldbeeren in zureicher Sauce mit Nudeln (8,11)	Grillfleisch mit Ofenkartoffeln und Dip	Gutkorn-Salat mit Chili und Honig	Gemüse-Eintopf mit glutenfreiem Brot

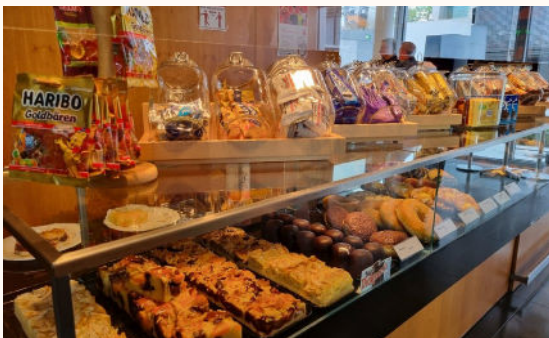
The caterer of the university canteens in the Brittany region of France offers two vegetarian options besides one meat or fish dish. 50% of the students choose the vegetarian menu (1.5 million vegetarian meals each year).



Some cities have implemented ambitious food strategies which address public procurement, making it easier for people to eat healthy and sustainably. The city of Copenhagen, for example, aims to reduce the carbon footprint of public meals by a minimum of 25% per capita by 2025. To get there, it aims to reduce the total amount of animal products and increase the amount of plant-based raw products and protein sources such as legumes.¹⁰⁴ Similarly, the Belgian city of Ghent is a frontrunner for the protein transition with their food strategy. Since 2009, all of Ghent's city schools, day-care centres and public services only serve vegetarian meals on Thursdays. As an action plan, the city has also promised to shift the protein consumption towards 60% plant-based by 2030.¹⁰⁵ In France, the Climate and Resilience Law adopted in 2021 has mandated the offering of a fully vegetarian menu at least once a week in school canteens, as well as the offering of a daily vegetarian option in government-run, public-sector facilities.¹⁰⁶



Despite actively working on a nutrition strategy for Germany¹⁰⁷ and aiming to tackle food environments, the German National Parliament does not translate their ambitions into action on their own premises. The canteen of the Bundestag offers a variety of HFSS snacks, pastries and cakes on a large display.



credit: Oliver Huizinga, Political Director at the German Obesity Society (DAG)

¹⁰⁴ <https://maaltider.kk.dk/sites/default/files/2022-06/The%20City%20of%20Copenhagen%20Food%20Strategy%202019.pdf>
¹⁰⁵ <https://stad.gent/en/city-governance-organisation/city-policy/ghents-climate-actions/sustainable-food#93300>
¹⁰⁶ <https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000043956924>
¹⁰⁷ <https://www.bmel.de/DE/themen/ernaehrung/ernaehrungsstrategie.html>

WHAT WE NEED:

- Public canteens (in schools, hospitals, day-cares, etc.) should serve healthy and sustainable meals – including more plant-based and with ‘less and better’ ASF.

HOW TO GET THERE:

- The FSFS should introduce mandatory requirements for sustainable public food procurement covering the environmental, social-health (including animal welfare) and economic dimensions.
- National dietary guidelines that integrate sustainability concerns should serve as a basis for public procurers of sustainable and healthy meals. To this end, the FSFS should require Member States to update their food-based dietary guidelines with a view to integrating sustainability (following the lead of countries such as Denmark and Spain).
- As part of their National Food Plans, governments should set time-bound targets for progressively increasing the procurement of healthy and sustainable food. These targets should be accompanied with adequate financial and technical support for public buyers – including regarding the training of staff handling and preparing food in public settings.

WHAT ABOUT FOOD LABELLING?

Labelling is one of the entry points for action on food environments – along with promotion, prices and more. **Not only does labelling allow consumers to make better informed choices, but it also incentivises companies to improve their products** (especially graded labels that apply across-the-board and include an interpretive element such as a colour code). BEUC, EPHA and Eurogroup for Animals have long been calling for improved consumer information on the nutritional value,¹⁰⁸ environmental impact¹⁰⁹ and method of production (for animal welfare) of food products.¹¹⁰ We have also campaigned against misleading claims misrepresenting the health and nutritional,¹¹¹ or environmental¹¹² benefits of food products.

Scientific evidence increasingly shows, however, that **consumer information and labelling**, even while they are trustworthy, **are insufficient on their own** because consumer choices are also affected by factors such as cultural food taste preferences, advertising or pricing.¹¹³ For this reason, and because labelling already tends to get a lot (if not most) of policy attention, we have chosen not to cover food labelling in this report. We remain convinced that **improved labelling is important and necessary**. Yet it is **not a silver bullet** and is only one tool in policymakers’ toolbox.

¹⁰⁸ https://www.beuc.eu/sites/default/files/publications/BEUC-X-2022-133_Public_health_and_consumer_groups_ask_for_a_timely_proposal_on_Front-of-Pack_Nutritional_Labelling.pdf

¹⁰⁹ <https://foodpolicycoalition.eu/wp-content/uploads/2022/03/Joint-letter-on-concerns-over-PEF-methodology-for-agri-food-products.-MAR-2022..pdf>

¹¹⁰ <https://www.eurogroupforanimals.org/what-we-do/areas-of-concern/method-production-labelling#:~:text=Method%2Dof%2Dproduction%20labelling%20on,more%20humane%20animal%20agriculture%20industry>

¹¹¹ https://www.beuc.eu/sites/default/files/publications/beuc-x-2017-049_mgo_joint-letter-eu-wide-nutrient-profiles-for-nutrition-and-health-claims.pdf

¹¹² https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-025_A_climate-neutral_food_basket-Too_good_to_be_true.pdf

¹¹³ Scientific Advice Mechanism, Group of Chief Scientific Advisors (2020) [Towards a sustainable food system](#). Scientific Opinion Nr. 8. European Commission.

6 Making food healthier and more sustainable by design

Food characteristics can be understood as encompassing the nutritional composition of products as well as their method of production and processing, and what it means in terms of the products' environmental, animal welfare and other impacts.

By improving their products' recipes to make them healthier, by offering a broader range of healthy options and smaller portion sizes, and by switching to sustainably sourced ingredients (e.g. from organic farming and high animal welfare standards), food producers, retailers and the food service and catering sectors can do a lot to support consumers in making healthier and more sustainable choices.

As a follow-up to the Strategy for Europe on Nutrition, Overweight and Obesity related health issues published in 2007,¹¹⁴ a series of frameworks for national initiatives on food reformulation was developed in a bid to boost efforts by food companies to lower amounts of salt, saturated fat and added sugars in their products.^{115,116,117,118} Over a decade later, however, progress has been insufficient because of a reliance on voluntary commitments and industry's goodwill. In the Netherlands for instance, the consumer organisation Consumentenbond has lamented the lack of binding rules to oblige food makers to cut levels of salt, saturated fat and sugars in their products.¹¹⁹ Whereas the prospect of a compulsory colour-coded front-of-pack nutritional label has incentivised some producers to improve their recipes to avoid red scores on their products,¹²⁰ **much more could be done to push companies to offer healthier products to consumers.**

A good example of **bold and impactful policy action to make food products healthier by design is the legal restriction on artery-clogging trans fats** which has applied in Europe since 2021. Manufacturers have had to bring down the amount of industrially produced trans fatty acids to less than 2gr per 100 gr of fat in products such as pizzas, biscuits, and wafers.

Product improvement is not restricted to the nutrition area. Take animal welfare for instance. Several companies and fast-food chains have **committed to switching to cage-free eggs** in their products in all or part of the world. Yet to ensure that progress in this area does not remain limited to a few front-runners, regulation should be adopted to phase out cage eggs across Europe.



Big multinational companies such as Nestlé, Unilever, and Mondelez as well as fast-food giants such as Burger King, McDonald's, and Starbucks have all committed to sourcing 100% cage-free eggs in their products, and some have already reached this goal.



Product improvement is also not restricted to the food we produce in Europe. A lot of the food we eat is imported from third countries, and while it must comply with European food safety and labelling rules, it does not need to meet production requirements (such as those relating to animal welfare). Not many consumers are aware of this fact – and when they are, the lack of origin information often keeps them in the dark as to where food comes from. **This means that when dining out, or when buying nuggets made from imported poultry meat for instance, consumers may unwittingly eat meat from animals reared in conditions that do not match those from animals raised in the EU.** With nine out of ten Europeans agreeing that imported products should respect EU animal welfare standards,¹²¹ much more should be done to ensure that this becomes the rule.

¹¹⁴ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0279:FIN:EN:PDF>

¹¹⁵ http://ec.europa.eu/health/archive/ph_determinants/life_style/nutrition/documents/salt_initiative.pdf

¹¹⁶ https://health.ec.europa.eu/system/files/2016-11/euframework_national_nutrients_en_0.pdf

¹¹⁷ http://ec.europa.eu/health/nutrition_physical_activity/docs/saturated_fat_eufnisen_en.pdf

¹¹⁸ https://health.ec.europa.eu/system/files/2016-11/added_sugars_en_0.pdf

¹¹⁹ https://www.consumentenbond.nl/nieuws/2021/aanpak-te-veel-zout-suiker-en-vet-in-voeding-heeft-gefaald?cid=ext_twitter_ggez_aanpak-ongezonde-voeding

¹²⁰ <https://www.quechoisir.org/action-ufc-que-choisir-nutri-score-seule-une-obligation-de-l-afficher-poussera-les-industriels-de-la-malbouffe-a-ameliorer-leurs-recettes-n107018/>

¹²¹ European Commission, Directorate-General for Communication, 'Special Eurobarometer 442: Attitudes of Europeans towards Animal Welfare', 2016, http://data.europa.eu/88u/dataset/S2096_84_4_442_ENG.

CONCLUSION

Food choices are seldom random or based on the best available information but are influenced by a complex range of factors beyond individual control. In stark contrast to the narrative that relies on consumer information, their willpower and responsibility to make 'better' food choices, our report shows that most food environments steer consumers towards unhealthy and unsustainable diets.

Whether they shop at the supermarket, dine out, order food from a meal delivery app, or eat in a public canteen, consumers keep being pushed towards choices which are good neither for health nor for the planet. From price signals to marketing practices through food characteristics, **food environments need to change** to make it easy for Europeans to eat healthy and sustainably.

The good news is that some private and public operators are leading the way, as our report also demonstrates. But they can do much more to steer change in eating habits towards diets which are healthier, more plant-based, and with 'less and better' ASF.

The legislative Framework for Sustainable Food Systems offers a unique opportunity for the EU to initiate a transformation of food environments. EU policymakers must stop shying away from taking effective (i.e. regulatory) action, when the mapping of commitments under the EU Code of Conduct for responsible food business and marketing practices has clearly shown that industry self-regulation delivers weak and patchy results.

Finally, the FSFS and the subsequent transformation of food environments are also the occasion to **bring the EU closer to its citizens** – many of whom can feel distant from 'Brussels' at times. With the rising cost of living topping their concerns, Europeans expect the EU to work on solutions to bring about concrete, positive change in their lives. Ensuring easy and affordable access to healthy sustainable diets for all would be a good place to start.

We would like to thank our members and colleagues, who have supported us in collecting real life food environment examples. Specifically, we would like to thank Eurogroup for Animals' members Animal Law Italia, Animal Protection Denmark, Campaigns and Activism for Animals in the Industry (CAAI), Otwarte Klatki, Green REV Institute, Humánný pokrok, Djurens Rätt, and LAV as well as BEUC's members Altroconsumo, Confederación de consumidores y usuarios (CECU), DECO, Forbrugerrådet Tænk (FBRNO), KEPKA, Spoločnosť ochrany spotrebiteľov (S.O.S.) Poprad, Sveriges Konsumenter (SK), and Verbraucherzentrale Bundesverband (vzbv).

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