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Climate and Resilience Bill: an opportunity to take better account of the climate in food policies

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For food policies to take better account of climate issues, members of the Citizens' Convention on Climate (CCC) have proposed their integration into the scope of the French National Nutrition and Health Programme (PNNS). This suggestion responds to several key sustainable food governance issues. However, the Climate and Resilience Bill (resulting from CCC proposals) departs from the initial proposal, which limits its scope. This blog post outlines several recommendations to strengthen the ambition of this measure.

The PNNS, a food policy reference framework

The [French National Nutrition and Health Programme](#) (PNNS) is the main national reference text on nutrition. Created in 2001 and revised every five years, its purpose is to ensure that public health policies take better account of nutrition (Boubal, 2019);¹ it is therefore under the supervision of the Ministry of Health. The key public policy tools of the PNNS remain the provision of health information and education, which are made available to the general public via a number of tools implemented by the French Public Health (Santé Publique France) agency.² These tools include: an internet portal to publicize nutritional recommendations (mangerbouger.fr); communication campaigns (“Mangez cinq fruits et légumes par jour” - Eat five fruits and vegetables a day); and, more recently, the development of the [Nutri-Score](#) nutrition label (which is now being rolled out across Europe). The PNNS is not the only text that provides a framework for food policies in France: it coexists with the [National Food Programme](#) (PNA), launched in 2010 and also revised every five years, under the supervision of the Ministry of Agriculture. To improve the synergy between the PNA and the PNNS, in 2019 the Ministries of Agriculture and Health—during the last revision of the two programmes—produced a [“joint presentation document”](#) called the National Programme on Food and Nutrition (PNAN), which at present has no legal or regulatory basis—there are no legal texts that mention its existence or role—nor does it have allocated resources.

The spirit of the CCC proposal

Among the proposals of the “Eating” working group of the Citizen’s Climate Convention is that of “strengthening communication on PNNS and reforming the PNNS into a PNNS Climate” (Proposition SN5.2.1).³ In our opinion, this proposal addresses various issues.

The PNNS has insufficient means of action: the first aspect of the proposal concerning strengthening the PNNS’s communication is linked to the observation of a [lack of effectiveness](#) of communication and awareness tools implemented on behalf of the programme, particularly among the most disadvantaged populations (Hercberg, 2017). In 2014, for example, the PNNS’s communication budget amounted to €4 million,⁴ while the food sector’s media investment reached €2.4 billion,⁵ heavily directed towards promoting the type of nutrition-poor foods that the PNNS advises against. However, lack of financial resources is only one cause of PNNS inefficiency: institutional constraints, particularly the search for consensus between nutritional recommendations and the private sector, have an impact on the design of communication campaigns, and this “gradually overshadows the issue of effectiveness,” as shown in the [work of Camille Boubal](#).

The citizen must be provided with a systemic vision of sustainable food: The PNNS has so far focused on health issues. However, health is only one component of sustainable food, which also incorporates various environmental issues: reduction of climate change impact, biodiversity protection, reduction of plastic pollution, etc.⁶ The absence of a reference text that takes the different facets of sustainable food into account may lead to a confusion of voices and recommendations, leaving consumers to fend for themselves, while not facilitating coordinated collective action.⁷ By including environmental issues, particularly climate change, the PNNS could therefore serve as a benchmark for sustainable food.

Nutritional and environmental recommendations must eventually converge: although the latest PNNS shows the beginnings of convergence between nutritional and environmental recommendations (reducing meat and dairy product consumption, increasing the consumption of beans and pulses, encouraging the consumption of organic food), the recommended consumption thresholds are not yet at the level needed to comply with global limits (Loken and DeClerck, 2020).⁸ It is therefore important that, in the medium term, nutritional recommendations should take

environmental issues into account, as suggested by ANSES (French Agency for Food, Environmental and Occupational Health Safety) in the concluding sentence of its [latest report on updating dietary guidelines](#), as well as the National Low Carbon Strategy (2015, 2018). A number of scientific works on the future of food are also at the crossroads between environment and health agendas (see in particular [Eat-The Lancet](#)). In the short term, however, the priority is to translate nutritional recommendations into actual dietary practices, which is far from being the case at present.⁹

Convergence between the health and climate food agendas can be regarded as a strategic opportunity, as such an alliance would help increase political clout and thus strengthen the forces for change against the status quo. This synergy should then be translated into governance changes,¹⁰ for example by better integrating environmental actors as stakeholders, but also into coordination between the Ministries of Health, Agriculture and Ecological Transition; and efforts to improve the transparency of the functioning of these different programmes.¹¹

The Climate and Resilience Bill: a missed opportunity?

Article 61 of the Climate and Resilience Bill, which is supposed to take up the CCC's proposal, in fact departs from it in several ways. Firstly, the Government does not propose any practical measures to strengthen the communication and resources of the PNNS, even though its resources are clearly insufficient. Secondly, it does not propose the integration of climate into the PNNS, as suggested by citizens, but instead into the PNAN, which has been renamed as the "National Strategy for Food, Nutrition and Climate" and inserted into the rural code, with the role of "determining the orientations of less carbon-intensive sustainable food policies" (10/02 bill draft). While this decision may potentially enable a more cross-cutting approach to food policies, as suggested by [the French government](#), since the PNAN is the umbrella organization for the PNNS and the PNA, it must nevertheless include accompanying measures to ensure a real step forward in the transition towards a more sustainable diet.

We identify three conditions that seem particularly important in this respect:

- a) It is absolutely essential to reduce the gap between the financial means allocated to the promotion of sustainable food and that dedicated to selling products that differ significantly from such foods. This objective requires both a strengthening of the budgetary means intended to inform and raise awareness about sustainable food among the population, and at the same time regulating advertising food products that are not sustainable for health or the environment (see footnote 5).
- b) If the PNAN were to become the "National Strategy for Food, Nutrition and Climate", it should explicitly be mandated to ensure compatibility between French climate objectives as defined by the National Low Carbon Strategy (SNBC) and the nutrition policies set out in the PNA (e.g. as part of the funding of the Territorial Food Plans) and the PNNS.
- c) Finally, the third condition that follows on from the second, is the necessity to integrate the Ministry of Ecological Transition into the implementation of this strategy, to ensure consistency with French climate objectives. It should be noted that the PNAN is currently drafted solely by the Ministries of Agriculture and Health.

¹ France was a pioneer in proposing this programme when it held the Presidency of the European Council. At the time, the programme was also seen as a response to the consumer confidence crisis that emerged during the mad cow crisis.

² In 2016, the Institut de la prévention et l'éducation à la santé (INPES) merged with the Établissement de préparation et de réponse aux urgences sanitaires (EPRUS) to create the Santé publique France agency.

³ The legislative committee, which has translated the citizens' proposals into law, is thus proposing to modify the definition of the PNNS in the health code.

4 See Boubal (p. 70 and p. 148). IGAS (General Inspectorate of Social Affairs) estimates are of a similar order of magnitude (between 2 and 5.7 million euros between 2011 and 2015). IGAS points out the great difficulty in reconstituting the budget of the PNNS on the basis of the budget documents (p. 34-37; no mention is made of this in the official document presenting PNNS 4), which is problematic for assessing the capacity of this tool to achieve its many objectives.

5 The CCC also proposed to ban advertising products proscribed by the PNNS (proposal SN 5.2.2). The Climate and Resilience Bill cautiously takes up this proposal by referring to the voluntary commitments of actors in the media, food and advertising industries. It should be noted that 88% of advertising spots that target the youngest audiences promote Nutri-Score D and E foods, while this figure is 43% for all audiences.
<https://tinyurl.com/y4azmrkv>

6 This consideration of the links between health and environmental issues is, for example, advocated by the One Health concept.

7 In the absence of a reference vision enabling the linking of health, environmental and social issues, civil society actors such as consumer associations, for example, are finding themselves unable to adopt a position on clear recommendations.

8 In particular, to strengthen ambitions in terms of the consumption of beans and pulses, and the reduction of meat consumption, including poultry, which is not the case today.

9 According to the Esteban study, “few adults report that their consumption is in line with the new dietary recommendations”; Santé publique France, 2019, Adéquation aux nouvelles recommandations alimentaires des adultes âgés de 18 à 54 ans.

10 On this subject, we can refer to the 2019 RAC-Solagro report, in particular p. 8 on governance within the PNNS.

11 For example, the complex governance of the PNNS and the opacity of its functioning make it difficult to know “who’s talking” and who “ensures the ownership of the proposals”, see <https://www.cairn.info/que-manger--9782707197702-page-23.htm> . Moreover, the composition of the PNNS Monitoring Committee is not made public, and changes regularly.

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