



IMPULSE

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# Towards food policies that support healthy and sustainable consumption

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Country case studies and the role of EU food policy



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### Impulse

Towards national food policies that support healthy and sustainable consumption.  
Country case studies and the role of EU food policy.

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## Preface

Dear reader,

Food policy is relevant for a complex set of interconnected challenges, including food security, public health and environmental sustainability. To address these issues effectively, demand-side policies, that support healthy and sustainable consumption patterns are needed. This implies not only new measures, but also a more coordinated approach, one that aligns different policy areas and enhances coherence across local, national and EU levels. Such a coordinated, integrated approach to food policy is still rare among European countries.

With this policy paper, we particularly aim to inform national policymakers in the Member States and at EU level about the potential of demand-side food policies. Specifically, we examined key policies to support fair food environments and thereby improve competence in healthy and sustainable diets as well as their affordability, availability and appeal.

Beyond specific policy measures, we also highlight success factors in the policy development process and examine the potential role of food strategies at the national level. Our insights are illustrated with positive examples from eleven European case studies, which are presented here and detailed in the accompanying report [\[link\]](#). We conclude with an overview of entry points through which EU policy can best support national food policies.

We hope that this policy paper will be a valuable contribution to the discussion on integrated food policies and their role in building a sustainable, healthy and equitable food system across Europe.

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## → Key findings at a glance

- 1 **Changing food consumption patterns has significant potential to help solve pressing challenges related to the food system.** These include reducing greenhouse gas emissions, improving public health as well as strengthening food security and strategic autonomy. To realise this potential, demand-side food policies – designed to support changes in consumer behaviour – are an essential tool.
- 2 **Demand-side policies can help create fair food environments by improving food-related competences and the availability, affordability, and appeal of healthy, sustainable options.** This moves the focus from individual responsibility towards shaping the conditions in which choices are made. It marks a paradigm shift from current policy approaches that mostly focus on consumer education and information – but have limited impact without parallel changes to the broader food environment.
- 3 **Promising examples of demand-side policies are emerging across Europe, offering inspiration for EU Member States.** These initiatives address the different aspects of food environments to make healthy and sustainable options the easy choice. Important policy instruments include public food procurement and product reformulation, labelling and information, marketing and advertising rules and fiscal measures such as taxes and other incentives.
- 4 **National food strategies and supportive EU-level frameworks can help governments to advance effective demand-side food policies.** Interventions addressing food consumption are often seen as complex and politically sensitive. In this context, an EU platform could facilitate the sharing of best practices and success factors among Member States. At the same time, the development of national food strategies offers a space for negotiation on a shared vision and measures.

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## Executive summary

The food system in the EU is characterised by high levels of food safety, variety and availability. Extreme forms of undernourishment and hunger are very rare. However, new challenges have emerged for food policy in recent decades, ranging from health and diet-related diseases, household food insecurity, animal welfare debates to the environmental and climate impacts of the food system, and its resilience to environmental degradation, pandemics and growing geopolitical instability.

Demand-side food policies offer untapped potential to address many of these challenges by contributing to more sustainable and healthier food consumption patterns. This includes reducing food waste and promoting healthy and sustainable diets, in line with dietary guidelines, with high intakes of vegetables, fruits, whole grains, nuts and legumes, and moderate intakes of fish, dairy products, meat and sugar.

Against this background, this policy paper analyses food policies in eleven European countries and explores opportunities for further developing demand-side food policies. Combining the results of the case studies with a broad literature review, we provide insights into three key questions for food policymaking:

1. **What changes in the current food policy mix can mobilise this untapped potential?** How can demand-side food policies become more effective?
2. **Which policy instruments are effective in shifting towards more sustainable and healthier food consumption patterns** and why is building fair food environments so important in this regard?
3. **How can policymakers develop and implement effective demand-side food policies?** What are key learnings on how to develop, adopt and implement policies that create fair food environments? How can EU policy support this?

These questions are addressed after an overview of the methodology.

### Methodology

This report brings together insights from case studies of eleven European countries and key findings from the grey and academic literature on food policy. This combination of case study-based policy analyses and a literature review provides insights into the important aspects of effective food policymaking.

The country case studies cover nine Member States of the European Union (Denmark, Finland, France, Germany, Poland, Portugal, Spain, Sweden and the Netherlands) as well as Switzerland and the United Kingdom. The analysis of the case studies was carried out by policy experts in research institutions in their respective countries (see Table 1 in the Introduction). This report summarises some of the main findings from the case studies. They are presented in full in a separate report [[link](#)].

Each country case study provides background information on the country's food policy, one to three examples of demand-side policies as well as processes that led to their adoption. The countries and policy examples were selected to highlight positive examples from different European regions and to illustrate the diversity of demand-side policies, e.g. public procurement requirements for food, free school meals, 0% VAT on fruit and vegetables, a sugar tax, community approaches to diet-related diseases and food aid alternatives, reform of dietary guidelines etc. The case studies also analyse governance, institutions and processes, such as the role of citizens' councils, the involvement of local and regional food policymakers or the establishment of a public-private partnership for food waste reduction.

## 1. What changes in the current food policy mix can mobilize the untapped potential?

The context of food policy has changed significantly in recent decades. However, its approach and focal points of food policy often remain the same. At both EU and national level, food policy continues to focus on agricultural production as well as on food safety and nutrition. Work on other food policy objectives, such as health, environmental quality, social equity or animal welfare, is either lacking, marginal or is not well coordinated, leading to a substantial lack of coherence. Finally, where demand-side food policy instruments that support changes in consumer behaviour exist, they still largely rely on the provision of information, placing the primary responsibility on the consumer.

The absence of a well-coordinated and thus integrated food policy, including measures that address the demand side, comes at a high cost to societies, as little change takes place in consumption patterns that are linked to health, environmental and social equity deficits.

To address these challenges, food policy needs to change in three ways:

- First, **a more efficient food policy requires to further develop demand-side food policies.** Policies focused on the production side alone are not sufficient to bring about changes in consumption patterns. A more impactful food policy should pay particular attention to actors in the middle of the chain, such as retailers and industrial operators, who have considerable influence on the production and demand side of the food chain.
- Second, **the development of demand-side food policies requires building fair food environments.** Recognising the role of food environments is a paradigm shift in policymaking, with a focus on interventions that go beyond merely providing information to consumers. Information has limited impact on consumers food choices and behaviour without changing the broader food environment. Rather, policies need to improve

not only food-related competences as well as the availability, affordability and appeal of sustainable and healthy options.

- Third, **building fair food environments requires greater coherence across policy areas and policy levels.** Competence and influence over the factors that shape consumption patterns are distributed across policy areas (social, environmental, health, spatial planning, etc.) and scales (EU, national, local). An effective food policy ensures that they are interconnected, reducing trade-offs and increasing synergies.

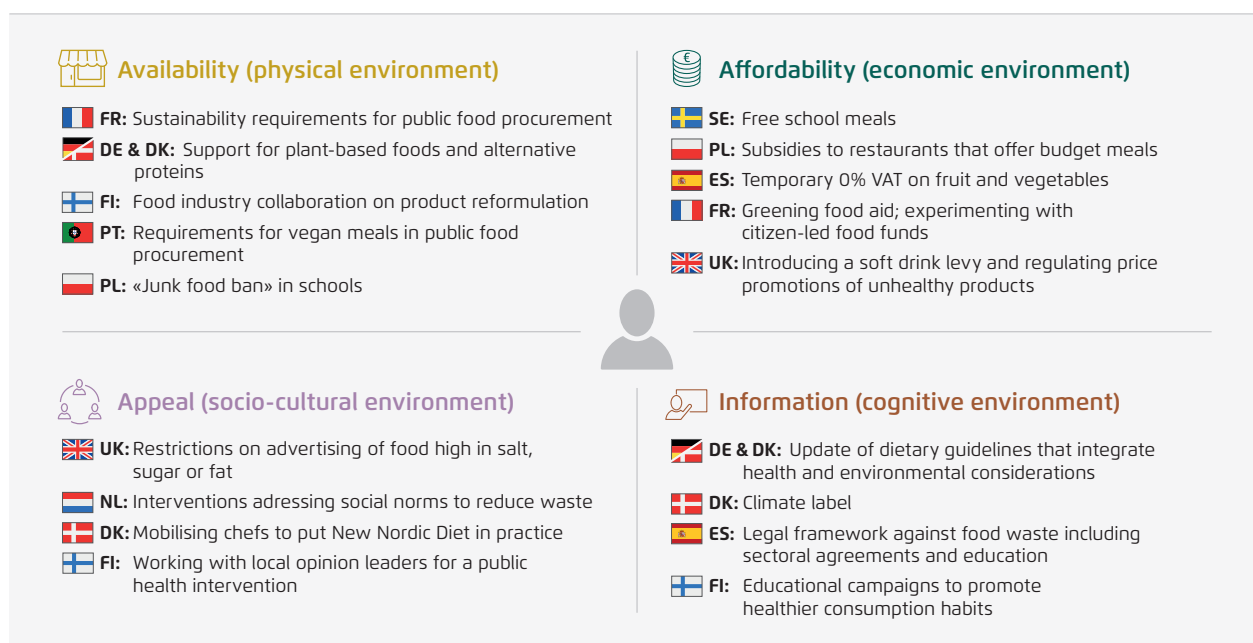
## 2. Which policy instruments are effective in changing food consumption patterns?

Fair food environments influence consumer food choices in four dimensions. These can be addressed through different policies:

- A. policies that improve **availability** (physical environment) – for example
  - availability of food in public procurement that is linked to dietary guidelines or (other) sustainability standards
  - instruments addressing retailers and their product portfolio including sustainability reporting standards
  - implementation of reformulation targets, affecting products that are high in salt, sugar and/or fat
- B. policies that improve **affordability** (economic environment) – for example
  - instruments to address social security systems, basic income and food aid
  - adaptation of fiscal policies (such as VAT rates or a soft drink levy)
  - a general review of financial incentives and disincentives in the food system
- C. policies that improve **appeal** (socio-cultural environment) – for example
  - limiting exposure to advertising for products whose frequent consumption is unhealthy, especially advertising aimed at children

## Case study examples of this report that help to build fair food environments

→ Fig. 1



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- involving opinion leaders or mobilising public funds to promote the consumption of, for example, fruit, vegetables or legumes

D. policies that improve **information**

(cognitive environment) – for example

- development and use of reliable labelling schemes
- use of primary and secondary education to increase food-related knowledge and competences
- provision of information on dietary guidelines or best practices to avoid household food waste.

A wealth of examples can be found in European countries, covering the four dimensions of the food environment. These are presented in the case studies in this report (see Figure 1).

### 3. How can policymakers develop and implement effective demand-side food policies?

Although there is a growing number of good practice examples of demand-side food policies in a

number of European countries, they are still rarely implemented across Europe. Indeed, our case studies and literature review show that the development of demand-side policies is often perceived as a) too politically sensitive, b) too complex, c) too difficult to agree on due to the number of stakeholders involved.

In this policy paper, we reflect on options to address these challenges and show that:

- new governance mechanisms and/or bodies (e.g. to coordinate food-related policy proposals across government departments), the development of policy packages and policy evaluation based on continuous monitoring can be useful in dealing with the complexity of food policies
- well-designed stakeholder engagement processes, collaboration along the food chain on specific policies and the use of scientific input can help to manage controversies and set a common vision
- food environment policies can increase fairness, and sequencing interventions can be a useful strategy in a difficult political context.

National food strategies can play an important role in overcoming common barriers to the development

and implementation of demand-side food policies. While they are neither a prerequisite nor a guarantee for an impactful food policy, they can make a useful contribution to overcoming the barriers mentioned above. For example, the development of national food strategies provides a space for negotiation between different actors in the food system to agree on a common vision and implementation plan. We therefore provide an overview of important steps in developing a food strategy, from the preparatory phase to implementation and monitoring.

EU policies can be another relevant enabler for demand-side food policies at national level. We identify six different entry points through which the EU can effectively support action at the national level. These fall under two categories:

First, establishing processes and supportive frameworks that incentivise Member States to develop and improve demand-side measures for more integrated food policies.

This includes:

- improving EU-wide food system indicators and data monitoring, among others in the area of household food insecurity
- establishing an EU platform to support collaboration on and implementation of integrated food policies in Member States

- mainstreaming sustainable food system objectives and principles into existing national strategies, such as within the CAP Strategic Plans and National Energy and Climate Plans
- EU-wide support and investment focused on promoting healthy, plant-rich diets, for example through the launch of an EU Action Plan for Plant-Based Foods

Second, adopting EU-wide regulatory measures where European-level action offers particular value, such as creating a level playing field across the single market. Examples include:

- providing EU-wide regulations, for example for labelling frameworks, food reformulation or minimum standards for public procurement.
- establishing a framework establishing common principles and objectives for the EU food system and phasing-in the adoption of national food strategies

Against the background of the EU Vision for Food and Agriculture of February 2025, which announced several dialogue formats and a comprehensive plan for a sustainable EU protein system covering production and consumption, our policy options for an EU Platform for Fair Food Environments to support Member States and an EU Action Plan for Plant-Based Food are two starting points for strengthening demand-side policies in Member States through EU policy action.

## Introduction

Food systems face a wide range of complex challenges that affect food security, climate, the environment and the social well-being of populations globally and in the EU. Addressing these challenges requires not only food policies on the production side, but also demand-side food policies to promote healthy and sustainable consumption patterns.

There is broad scientific consensus that changing food consumption patterns has significant potential to help solve pressing food system challenges and can contribute to achieving health, social well-being, climate and environmental goals, as well as global food security and strategic autonomy.

However, policies aimed at sustainable and healthy consumption and the reduction of food waste (hereafter referred to as “demand-side food policies”), whether at EU or national level, suffer from several shortcomings. First, they remain largely underexplored. Second, they are analysed as lacking coherence, direction and ambition. Third, demand-side policies have so far relied mainly on providing information to consumers. Several studies show that this shortcoming has resulted in a limited impact on consumption in the absence of parallel efforts to address the broader food environment. Rather, policies not only need to improve food-related competences but also the availability, affordability and appeal of healthy and sustainable options.

It is against this backdrop that participants in the Strategic Dialogue on the Future of EU Agriculture called for taking action by declaring that “the Commission and Member States should adopt demand-side policies, which address agri-food systems as a whole, to create enabling food environments where balanced, less resource intensive, healthy diets are available, accessible, affordable, and attractive” (European Commission, 2024, p. 55). At the same time, good examples of demand-side policies are emerging across Europe and can serve as inspiration for other EU Member States.

In this policy paper, we focus on demand-side food policies with the aim of informing national governments and other stakeholders about the opportunities related to their development by

- providing an overview of relevant policies, instruments, success factors and barriers
- outlining learnings from existing efforts and good practices in different European countries.

We also discuss the role that EU policy can play in supporting Member States in developing demand-side policies.

To this end, this policy paper presents key insights from the grey and academic literature and analyses food policies in eleven European countries to explore opportunities for further developing demand-side food policies. Each country case study provides background information on the country’s progress in food policy, the role of food strategies, relevant actors and concrete examples of good practice.

Table 1 gives an overview of the countries and focus areas covered. The full text of all the case studies, each between four and eight pages long, is published in the separate document “[Towards food policies that support healthy and sustainable consumption. Case studies from 11 European countries highlighting good practices for demand-side policies](#)”. The compilation of these examples shows the wide variety of policies that can be used to build fair food environments, but also the success factors that have helped in the adoption and implementation of these policies.

Combining the results of the case studies with a broad literature review, we provide insights into three key questions for food policymaking:

1. **What changes in the current food policy mix can mobilise this untapped potential?** How can demand-side food policies be made more effective?

2. Which policy instruments are effective in shifting towards more sustainable and healthier food consumption patterns and why is the creation of a fair food environment so important in this regard?
3. How can policymakers develop and implement effective demand-side food policies? What are the key learnings on how to develop, adopt and implement policies that create fair food environments? How can EU policy support this?

We structure this policy paper in five chapters.

1. Chapter 1 describes the challenges faced in today's food system and discusses the potential of demand-side policies to address these challenges, their main characteristics and expected societal benefits. It elaborates on the role of fair food environments and introduces the concept of integrated food policies.
2. Chapter 2 provides an overview of important demand-side policies along the four dimensions

of food environments: affordability, availability, appeal and information, and gives examples of good practices in European countries.

3. Chapter 3 identifies success factors for food policy implementation and discusses three commonly perceived difficulties in addressing demand-side food policies: political sensitivity and legitimacy; complexity; and managing diverging interests.
4. Chapter 4 describes the role of food strategies as a tool for better coordinated food policies, including an overview of relevant steps to develop and implement them. This chapter also summarises examples from different European countries and illustrates the heterogeneity of approaches to food strategies to date.
5. Chapter 5 outlines how EU policy can support Member States in improving demand-side food policies. In this chapter we also reflect on the food policy aspects of the EU Commission's Vision for Agriculture and Food.

## Case study focus areas of the policy brief and contributing partners

→ Table 1

Country	Contributing partner	Good practice policies analysed
France	IDDRI	<ul style="list-style-type: none"> <li>– Sustainability in public food procurement</li> <li>– Social policy: greening food aid and developing alternatives</li> </ul>
Germany	Agora Agriculture	<ul style="list-style-type: none"> <li>– Developing a food strategy: building momentum</li> <li>– Support for alternative proteins</li> </ul>
Netherlands	WUR	<ul style="list-style-type: none"> <li>– Food loss and waste reduction</li> <li>– Alternative proteins</li> </ul>
Finland	Demos Helsinki	<ul style="list-style-type: none"> <li>– National food strategy iterations</li> <li>– A public health intervention using a community approach: the North Karelia Project</li> </ul>
Denmark	Concito	<ul style="list-style-type: none"> <li>– Dietary guidelines for health and climate</li> <li>– Climate data in procurement and labelling</li> <li>– Promotion of plant-based foods and alternative proteins</li> </ul>
Poland	IZG	<ul style="list-style-type: none"> <li>– Health policy interventions: sugar tax and junk food ban in schools and kindergartens</li> <li>– Social policy for combating food poverty</li> </ul>
Portugal	University of Evora	<ul style="list-style-type: none"> <li>– Mandatory vegetarian options in public canteens</li> </ul>
Sweden	SEI	<ul style="list-style-type: none"> <li>– Free and more sustainable meals in schools</li> <li>– Organic food in public procurement</li> </ul>
Spain	BC3	<ul style="list-style-type: none"> <li>– Food Chain Law</li> <li>– 0% VAT on fruit and vegetables</li> <li>– Food Waste Law</li> </ul>
UK (Non-EU)	IEEP UK	<ul style="list-style-type: none"> <li>– Process of setting up recommendations for a food strategy</li> <li>– Dietary policy addressing obesity: soft drink levy and restrictions on the promotion of food high in fat, salt and/or sugar</li> <li>– Regional and local food policy</li> </ul>
Switzerland (Non-EU)	ETH Zurich	<ul style="list-style-type: none"> <li>– Involving experts and citizens to formulate integrated food policy recommendations</li> </ul>

# 1 A new vision for food policy: why demand-side food policies are needed

## 1.1 Food system challenges and the role of sustainable consumption patterns

The EU faces several challenges related to food systems, most of which are closely linked to food consumption patterns: health, environment, global food security and strategic autonomy. The ability to respond to these challenges is therefore closely linked to the ability to enable changes in food consumption.

Although the European food system today is characterised by high levels of food safety, variety and availability, and extreme forms of undernourishment and hunger are very rare (European Commission, 2023; SAPEA, 2020), a proportion of the EU population remains partly food insecure. While there is no explicit data on food insecurity in the EU, Eurostat data can be used as an indicator, showing that “9.5% of the EU population were unable to afford a meal containing meat, fish or a vegetarian equivalent every second day” (Eurostat, 2024).

Other challenges related to the food system and food consumption include health and diet-related diseases, as unhealthy diets are drivers of non-communicable diseases, such as cardiovascular disease, type 2 diabetes and various cancers. These together account for about 80% of the total disease burden in Europe (OECD & European Union, 2022). In addition, more than half of the adult population and up to one in three children in Europe are overweight or obese (WHO European Region, 2022). Changing dietary patterns towards more plant-rich foods is associated with reduced risk of obesity, type 2 diabetes, coronary heart disease, cardiovascular disease and some cancers (Hemler & Hu, 2019; Kahleova et al., 2017). Moreover, as calculated in the FAO’s “State of Food and Agriculture” report (FAO, 2023b), there are

significant hidden costs in the food system associated with diet-related diseases, including lower labour productivity and public expenditure.

Moreover, food policy faces challenges related to the environmental impact of the food system (Campbell et al., 2017) and its resilience in the face of environmental degradation and climate change. Based on a life cycle assessment, Sanye & Sala (2023) estimate that the food system accounted for 38% of the climate footprint of total EU consumption in 2021. There is broad scientific consensus that the two most important levers for reducing the environmental impact of food consumption are a) shifting towards healthier diets by increasing the share of plant-based foods in relation to animal-based foods and b) reducing food waste (Bowles et al., 2019; Lee et al., 2023; Rös et al., 2022; Sanye & Sala, 2023; Scherhauser et al., 2018; Willett et al., 2019).

Food consumption is also closely linked to global food security. Today, the EU is a net importer of calories, proteins<sup>1</sup> and virtual land<sup>2</sup>. If the EU were to adopt more plant-rich diets and a reduction in food waste, land demand for food would decrease substantially. As shown in Agora Agriculture’s 2024 study, this would reduce pressure on global land resources and thus contribute to global food security. According to the scenario developed in the study, the EU could

1 The European Union is a net exporter in value due to high value commodities (e.g. cigarettes, wine, cheese, spirits and high processed commodities) but it is a net importer of calories (11% of EU consumption is imported) and proteins (26% of EU consumption) (IDDRI & INRAE, 2021).

2 The EU is a large producer and exporter, as well as a large importer of agricultural products. To illustrate the effects of agricultural trade on land use, the so-called “virtual land trade” can be calculated. A virtual land trade balance converts trade flows to and from a geographical region into the area needed to produce the traded products (Qiang et al., 2020).

shift from being a slight net importer of virtual land in 2020 to becoming a substantial net exporter by 2045 (Agora Agriculture, 2024). In addition, a 2021 scenario by IDDRI and INRAE shows that agro-ecological production and dietary shifts towards more plant-based foods allow Europe to shift from a net importer to a net exporter of calories (Schiavo et al., 2021).

Finally, the objective of strategic autonomy has gained importance for the EU in recent years. Two key aspects with relevance for the food system are a) vulnerabilities related to protein supply (mainly feed for the livestock sector) and b) fertilisers. The EU was 76% self-sufficient in protein feed in 2023/2024, including only 34% in high-protein feed (Hristov et al., 2024). Second, diets rich in animal foods use fertiliser more intensively than those rich in plant foods (Harvey, 2023; Marlow et al., 2015). The EU is also heavily dependent on imports of fertilisers such as potash and phosphate and, indirectly, nitrogen (whose production depends on highly energy-intensive processes using imported natural gas) (Garske et al., 2024). A shift towards plant-rich diets can thus contribute to strategic autonomy by reducing the EU's dependence on animal feed and fertilisers. Reducing food waste also contributes to an efficient use of resources in the EU.

In conclusion, sustainable and healthy consumption patterns are key to successfully addressing many of today's challenges related to food systems. This means reducing food waste and promoting healthy and sustainable diets that, in line with dietary guidelines, are plant-rich, with high intakes of vegetables, fruit, whole grains, nuts and legumes and moderate intakes of fish, dairy products, meat and sugar. Addressing these challenges therefore requires a new approach to food policy.

## 1.2 The need for food policies to adapt to today's challenges

Food policies are all policies that have an impact on the food system<sup>3</sup>. Therefore, not only agricultural policies, but also aspects of environmental, health, economic and social policies can be food policies.

Historically, food policy in Europe has been viewed and addressed primarily through an agricultural lens (Candel & Pereira, 2017), initially rooted in a twentieth-century perspective centred on food *security* – defined at the time as “the fight against hunger through increased food production” (Lang & Barling, 2013). As a result, food policy has developed around tools and objectives that focus on agricultural production. Later, food *safety* also became a key component of EU food policy, with the General Food Law of 2002 as its cornerstone legislation.

In the context of growing and pressing food system challenges, recent evaluations of food policies in Europe show that they are no longer fit for purpose and call for a transformative food policy mix at both EU and national levels (Barbero et al., 2024; EEA, 2023; SAM, 2023). They underline that:

- Most measures are sectoral and lack overall coherence, indicating fragmentation across policy areas. This fragmentation can lead to conflicting policies, which may result in low performance. Existing policies should be evaluated to assess how they support (or contradict) the objective of a sustainable and healthy food system, and an integrated approach should be developed.
- Policy instruments mainly target producers and consumers but to a much lesser extent take into account the role of middle-of-chain actors, such as retailers and processors.

3 A food system covers “the entire range of actors and their inter-linked value-adding activities involved in the production, aggregation, processing, distribution, consumption and disposal of food products that originate from agriculture, forestry or fisheries, and parts of the broader economic, societal and natural environments in which they are embedded” (FAO, 2018).

- Demand-side policies remain largely underexplored. The few existing demand-side interventions – such as awareness campaigns to promote sustainable consumption – have primarily relied on providing information to consumers. This focus on information provision has been shown to have a limited impact if the affordability, availability and appeal of food choices are not addressed in parallel.
- Food policies are implemented at all levels of governance (European, member state, local), which can complicate the implementation processes of initiatives from one level to another and can lead to strong heterogeneity between Member States. Enhanced coordination between different levels of governance is key to improving coherence.

Addressing the food system challenges as described in Chapter 1.1 will require a more integrated approach to food policy that better coordinates food-related issues in these different policy areas, but also across policy levels and along the entire supply chain (see Box 1 and Figure 2 below).

A more integrated food policy is essential to improve coherence between sectors and levels of governance, to achieve objectives more efficiently, to leverage

synergies between policy instruments and to minimise trade-offs (EEA, 2023; European Committee of the Regions, 2023; OECD, 2021).

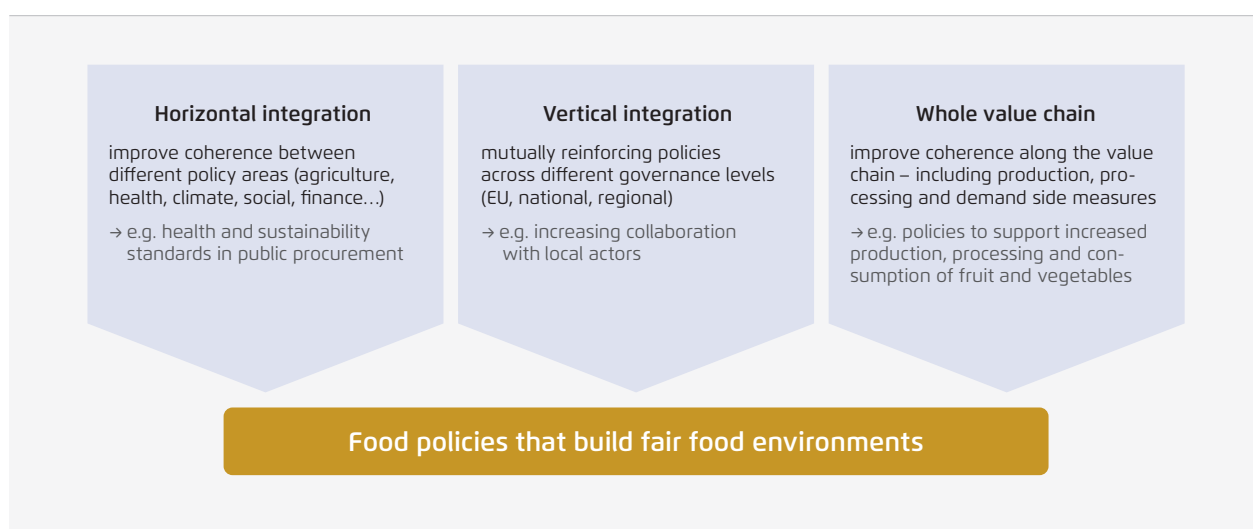
### → Box 1: An integrated approach to food policy

We define integrated food policies along three characteristics:

1. Integrated food policies improve the coherence between different policy areas relevant to the food system, such as agriculture, health, environment and social policies (horizontal integration).
2. Integrated food policies are complementary across different levels of governance, e.g. EU, national, regional (vertical integration).
3. Integrated food policies improve coherence along the entire value chain and also take into account the role of food businesses (value chain integration). They consider the relevant steps and actors involved in the production, processing, distribution, consumption and disposal of food.

## The three elements of integrated food policy

→ Fig. 2



In order to be efficient demand-side food policies need to build fair food environments – a key concept explained in the following chapter.

### 1.3 The key role of fair food environments

Food practices<sup>4</sup>, including food consumption patterns, are strongly influenced by the context in which they take place. This context is referred to as the food environment. More specifically, 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” (HLPE, 2017)<sup>5</sup>. Food environments determine the availability, affordability and appeal of food as well as the provision of food information. Research indicates that food environments significantly influence food choices through a number of factors, such as the meals offered in canteens, restaurants and schools; the relative affordability of different products and the way food is labelled and promoted in retail settings (FAO, 2021; HLPE, 2017; SAPEA, 2023).

Emphasising the role of food environments on consumer behaviour recognises the limitations of the concept of “responsible consumer” choice that has guided food policy for decades (Capacci et al., 2012; Macura et al., 2022; Temme et al., 2020). This concept is based on the idea that awareness, information and knowledge motivate people to make healthy food choices. However, science shows, that policies that only focus on providing information and education have a very limited effect on food consumption behaviour (Inserm, 2017; SAPEA, 2023), especially in the long term if the wider food environment does not change (Macura et al., 2022). This is because

daily food choices are not only simply goal-oriented or based on the best available information, but are shaped by structural factors at the household, community and system levels that are beyond the control of individuals (Herforth & Ahmed, 2015; Paddock, 2017; SAPEA, 2020; Thøgersen, 2024). The food system is characterized by asymmetries of power and information which further limit the agency and responsibility of individuals (SAPEA, 2020).

Moreover, the “responsible consumer” paradigm is not only problematic in terms of its effectiveness, but also largely disregards social inequalities. This is related to the fact individuals not all have the same capacity to translate recommended practices into action due to the type and level of constraints they face (Brocard et al., 2022). Studies<sup>6</sup> show that different social groups receive the same information in different ways, resulting in uneven capacities to take action and make sustainable or healthy food choices. One example of this is the socially differentiated reception of nutrition campaigns aimed at promoting fruit and vegetable consumption. Studies indicate that individuals with a higher socio-economic status find it easier to change their habits in line with dietary recommendations. At the same time middle-class consumers may find it more difficult (and therefore may feel guilty if they do not succeed) and lower-income groups may be critical of or indifferent to the norm (Régner & Masullo, 2009). Similar conclusions are drawn by Grunert & Wills in their meta-study analysing who uses labelling schemes to make purchasing decisions and how (Grunert & Wills, 2007).

Finally, the responsible consumer paradigm also does not sufficiently acknowledge the differences between consumers, that have different normative standards. As a result, a similar practice such as eating organic

4 Food practices encompass all aspects of daily life related to food, ranging from shopping, storing, preparing, sharing a meal and dealing with leftovers.

5 The academic literature around food environments is vast and convergent even though typologies may differ (e.g. Downs et al., 2020; Hawkes et al., 2013; Herforth & Ahmed, 2015; Swinburn et al., 2015). The concept has also been used in science-policy contexts to analyse food policies and make recommendations (Agora Agriculture, 2024; Brocard & Saujot, 2023; EEA, 2023; WBAE, 2020).

6 See the large international literature review on the reception of nutrition messages and the impact of marketing conducted by the French National Institute for Health and Medical Research (Inserm, 2017). For more specific contributions see, for example, Reckinger & Régner (2017) on a French-Luxembourgish comparison of the social reception of nutritional requirements, Einhorn (2020) on social attitudes towards meat consumption in Germany or Micheelsen et al. (2014) on the social acceptance of the New Nordic Diet.

will not have the same meaning or the same value depending on what group the individual belongs to. Practices may also be closely associated with a specific group, making other groups reluctant to adopt them. Such social dynamics can be reinforced by public policies that emphasise sustainable consumption practices as requiring radical change or framing them in terms that appeal to only a minority of the population. This in turn can prevent larger adoption of sustainable practices (Dubuisson-Quellier & Gojard, 2016; Johnston et al., 2012).

The implication for demand-side food policies is that they need to address all dimensions of the food environment to make sustainable and healthy choices easy for all (see Chapter 2). To address the social challenges associated with consumption patterns, the food environment approach needs to be further enriched with a dimension of fairness. In line with the German Scientific Advisory Board on Agricultural Policy and Food, we use the term “fair food environments” to indicate that they are “(1) attuned to our human perception and decision-making possibilities as well as behaviour; and (2) are

more health-promoting and have greater social, ecological and animal-welfare compatibility and thus contribute to sustaining the livelihoods of the world’s current and future generations” (WBAE, 2020, p. 5).

In contrast, the food environments that currently prevail in Europe discourage sustainable and healthy consumption patterns through a variety of factors, including price incentives, portion sizes and the marketing of unhealthy foods (BEUC, 2023; EEB et al., 2021). As such, they contribute to increasing diet-related outcomes such as obesity by exploiting people’s biological, psychological, social and economic vulnerabilities (Hall, 2018; Osei-Assibey et al., 2012).

Food policies have so far not sufficiently addressed the role of mid-chain actors such as food service providers, retailers and the food industry (EEA, 2023; SAM, 2023). Situated between producers and consumers, they hold great market influence and strongly shape food environments and consumption patterns. Addressing food environments therefore also means redirecting some of the focus from consumers and farmers to mid-chain actors (SAPEA, 2020).

## 2 Demand-side policy: designing fair food environments

Above, we reflected on the need for integrated food policies, their key aspects and expected benefits. We have highlighted the importance of demand-side policies and the role of supporting fair food environments, which have been underexplored in both national and EU food policies.

In this chapter we aim to answer the following questions: What demand-side policies contribute to fair food environments? What policies can effectively promote sustainable and healthy consumption patterns by directly or indirectly influencing diets and food waste?

We structure this chapter around the four dimensions of food environments: affordability, availability, appeal and information (see Figure 3):

1. Improving the **availability** of sustainable and healthy food by transforming the **physical environment** of consumers that determines what and

how much is consumed (e.g. in retail, schools, hospitals, restaurants, online stores and ordering platforms).

2. Improving the **affordability** of sustainable and healthy diets and promoting access to food for all by changing the **economic environment** of consumers (household income and prices).
3. Improving consumers' **information**, knowledge and competences (assessment of food's impact on health and the environment, cooking skills etc.) by changing their **cognitive environment**.
4. Improving the **appeal** of sustainable and healthy diets by promoting a supportive **socio-cultural environment** for consumers (e.g. through advertising, marketing, social eating norms).

In the following sub-chapters, demand-side policies that address the food environment are presented in more detail along the four dimensions. Each policy instrument is illustrated with examples of its implementation in European countries.

Examples of policies from all four dimensions of the food environment that influence food consumption

→ Fig. 3



Agora Agriculture and IDDRI (2025)

If the measure in question is referred to in one of the case studies in this report, we will indicate this by adding "(CS)".

## 2.1 Improving availability (physical environment)

The types of food available to people in their physical environment are an important factor in determining what and how much is consumed. This has an impact on health and other sustainability indicators. The physical environment includes both the commercial environment (supermarkets, shops, restaurants, online stores and ordering platforms) and the community environment (schools, hospitals, workplaces etc.). Changing the physical food environment to improve the availability of healthier and more sustainable options is an important lever for improving diets (European Commission, 2018; Kwasny et al., 2022; Walton, 2023). Availability refers to both the presence of a particular product in a store or canteen and its relative prominence. Product placement in specific areas such as the end of the aisle and the entrance to the store, but also store layout and increased shelf space have all been shown to increase purchases (Walton, 2023). Research shows that physical environments are often "obesogenic", meaning that they promote certain behaviours that are correlated with obesity and overweight (Lake, 2018). This is the case, for example, with the density of fast food outlets in an urban area. They can also discourage or impede access to nutritious and sustainable food (Cooksey-Stowers et al., 2017; Osorio et al., 2013), for example when the availability of fresh produce is poor.

Improving the quality of the physical environment therefore increases the availability of healthy and sustainable products and reduces that of others. Instruments include:

- Introducing mandatory standards or voluntary agreements for **product reformulation**, e.g. to reduce sugar, fat and salt in processed products
- **Spain:** agreements with industry players to reduce sugar, salt and fat (Barbero et al., 2024)
- **France:** sectoral agreement with the bread industry to reduce salt content
- **Finland:** public health intervention (North Karelia project) uses collaboration with the food industry to improve the provision of healthy food (CS)
- Supporting **product development and market access** for sustainable and healthy products
  - **Denmark:** promotion of plant-based foods and alternative proteins, including subsidy schemes for production (CS)
  - **Germany:** support for alternative proteins, e.g. public support for marketing platforms for legumes (CS)
- Reducing exposure to certain foods through **restrictions**, e.g. in public spaces
  - **Poland:** junk food ban in schools (CS)
  - **UK:** limits for new fast food restaurants near schools and restricting promotions of foods high in fat, sugar or salt in key locations in-store (checkout areas, ends of aisles, store entrances) and online
- Introducing **standards in public procurement** that shape the choice towards healthier and more sustainable food (e.g. linking public food procurement to dietary guidelines, through minimum requirements for organic and plant-based products or other quality requirements) and/or a reduction in food waste (e.g. reducing portion sizes)
  - **France:** series of measures to increase the sustainability of public and private food procurement: e.g. weekly vegetarian meals and a minimum threshold for the "quality" foods (including organic) (CS)
  - **Portugal:** requirements for vegan meals in public food procurement (CS)
  - **Sweden:** free school meals and public policy on organic products (CS).

## 2.2 Improving affordability (economic environment)

Affordability depends on two main factors: the economic resources of households; and the price of foods. However, it's not just about the price of food per se, but also about food that is in line with people's cultural preferences and knowledge. Research on sustainable diets shows that the composition of a sustainable and healthy food basket varies from country to country (due to cultural differences) and that its cost may be lower, equal or higher than the average food basket<sup>7</sup> consumed in that country.

Supporting the affordability of sustainable food is therefore an important area for policy intervention, as price is still perceived as a major barrier to sustainable diets across Europe according to consumer surveys (BEUC, 2020). At the same time, price signals (whether by increasing or decreasing the price) can be used as a means of directing consumers towards certain types of foods. These policies include: differentiated VAT rates; regulation of private actors' pricing and promotion policies (e.g. discount policies); health-related taxes (e.g. on sugary drinks or confectionery) (ECSIP Consortium, 2014; European Commission & ICF S.A, 2022).

Policies which increase prices for certain products might however disproportionately affect those with the lowest incomes compared to the rest of the population. This risk should be taken into account in decision-making and needs to be mitigated by complementary policies. While socio-economic inequalities between Member States have been decreasing, inequalities within countries are increasing (EEA, 2024). Policy instruments addressing food prices should therefore pay particular attention to the impact on vulnerable groups.

Finally, improving affordability is also about increasing the economic resources available to households. In this sense, policies that strengthen households' budgets also contribute to a more favourable food environment, such as social policies (e.g. food assistance) or labour market policies (e.g. minimum wage).

Policy entry points addressing affordability may take the following forms:

- Addressing and developing **public food provision services**, e.g. through food aid<sup>8</sup>, free meals for low-income households, subsidised shops and restaurants, food stamps, school programmes, etc.
  - **Poland:** commercial restaurants ("milk bars") offer cheap meals, supported by a state subsidy (CS)
  - **France:** local experiments around citizen-led food funds and food councils (CS)
  - **Poland:** "Meal at School and Home" programme supports low-income households with financial assistance, food products and meal delivery (CS)
  - **Sweden:** all school children have a legal right to free meals (CS)
  - **France:** greening food aid and developing alternatives (CS)
- Reviewing the **fiscal architecture**, e.g. adjusting VAT rates to reflect sustainability and health impacts or creating new fiscal incentives or disincentives
  - **Spain:** VAT reduction on essential food items, 0% VAT on fruit and vegetables (CS)
  - **UK:** soft drink levy (CS)
  - **Poland:** sugar tax (CS)

<sup>7</sup> In these studies, the cost of the food basket depends mainly on the proportion of organic/labelled foods (which tend to be more expensive), meat alternatives (idem) and meat products in the diet as well as on the amount of waste avoided. See Benvenuti et al., 2019; Boizot-Szantai et al., 2017; Hirvonen et al., 2020; Masset et al., 2014; Perignon et al., 2016; Rogissart et al., 2021; WWF, 2017.

<sup>8</sup> Food aid is generally one of the main responses to food insecurity at national level and is supported by the European Social Fund Plus (ESF+). From a system designed to respond to emergencies, the food aid system is now often linked to tackling food waste and providing market opportunities for part of EU production. Studies underline the limitations of the current food aid system, such as its reliance on nutritionally unbalanced food and its lack of respect for users' autonomy and freedom of choice. Researchers and associations underline the need to develop alternatives to this system (Caillavet et al., 2022).

- Monitoring the **food price formation** and **regulating the pricing and promotion** policies of private actors
  - **Spain and France:** establishment of an observatory to monitor and report food prices and analyse the value distribution in the value chain of certain food products. Spanish Food Chain Observatory (CS), French Observatory for Food Prices and Margins Formation, forthcoming European Agriculture and Food Chain Observatory
  - **Spain:** requirement that food prices paid by each tier of the food chain cover the production costs of the previous tier (CS)
  - **France:** requirement that trade negotiations between retailers and processors do not include the share of the product price that represents the cost of agricultural raw materials
  - **UK:** restrictions on promotions of products high in fat, sugar and salt (multibuy offers).

## 2.3 Improving information (cognitive environment)

Lack of information or competence is usually one of the main barriers cited by consumers when asked what prevents them from shifting to a healthier diet (BEUC, 2023). The provision of trustworthy, adequate and accurate information, e.g. through education or labelling, is therefore essential for a policy mix aimed at increasing the sustainability and healthiness of food consumption. It is also the area that is most frequently addressed by policymakers in the EU to date (Barbero et al., 2024).<sup>9</sup>

However, research shows that providing information to consumers without changing the wider food environment has limited impact (SAPEA, 2023). It is also important to consider the multi-factorial influences on consumer choice. For example, research on nutrition or sustainability labelling has shown a lack

of significant impact on consumer behaviour, due to the impact of other influences such as consumer confusion, information overload, limited interest in responding to the message conveyed by the label, lack of time to process the information (Osman & Jenkins, 2021). Another barrier to sustainable food practices is the lack of competences such as cooking skills, knowledge of food storage (which avoids food waste) and understanding of product information (Brown & Hermann, 2005; Reicks et al., 2018). Such competences are unevenly distributed in society and are closely related to the ability to receive and process new information (Mathé & Hébel, 2020).

Improving information is therefore not only about providing consumers with new information but also about limiting the overall amount of (sometimes conflicting) information, ensuring trust and providing citizens with the right tools to make decisions. It can take the following forms, for example:

- Developing and supporting **reliable labelling schemes**, which in the future should also reflect a more holistic approach to sustainability (e.g. integrating nutrition, environmental and animal welfare indicators)
  - **France:** development of the Nutri-Score health label now adopted by seven European countries (Hercberg et al., 2021)
  - **Denmark:** development of a voluntary state-controlled climate label (CS)
  - **Belgium:** "Sustainable Canteens Label" awarded to collective catering facilities that offer healthier and local food (Barbero et al., 2024)
- Using **primary and secondary education and vocational training to increase food-related knowledge and competences** (cooking, production methods, knowledge of health and environmental impacts, reduction of food waste, etc.) by introducing food-related classes into curricula
  - **Netherlands:** "Healthy Lifestyle Curriculum Framework" and the 2018 "Learning to Eat Young Programme" (Barbero et al., 2024).
  - **Finland:** public health intervention (North Karelia project) used educational campaigns to promote healthier consumption habits

<sup>9</sup> According to Barbero et al. (2024) "Nutrition label standards and regulations on the use of claims and implied claims on food" is the only area addressed in all EU Member States and the most targeted area in general.

- **Denmark:** promotion of plant-based foods and alternative proteins, including education of kitchen professionals, research and innovation (CS)
  - **Spain:** legal framework law against food waste including education and voluntary sector agreements (CS)
  - **Netherlands:** activities to reduce food loss and waste in households through information and interventions targeting social norms (CS)
  - **Netherlands and UK:** school education programmes on food waste reduction such as “Do Good: Save Food” in the UK or the Dutch Food Literacy Programme, including a module on food waste “Smaaklessen – smaakmissie” (Garcia Herrero et al., 2023)
- **Providing the public with reliable information on food and nutrition**, e.g. through public dietary guidelines, nutrition counselling, regulation of product information<sup>10</sup> and restrictions on false claims
- **Germany and Denmark:** updating of dietary guidelines taking into account the integration of health and environmental considerations (CS).

## 2.4 Improving appeal (socio-cultural environment)

Eating is a social practice. As such, it is strongly influenced by social norms, culture and social representations of products and behaviours. Socio-cultural food environments are shaped by a number of actors, such as opinion leaders, the media, industry and retailers (through marketing and advertising), public authorities (through public campaigns, recommendations), scientists, non-governmental organisations, but also peer groups (family, friends and colleagues). As a relevant factor, the influence of advertising and marketing on people's perceptions of food and food brands often unconsciously influences what and how much is consumed (Walton, 2023).

Behavioural change can be driven by changes in social eating norms, the perceived standards of what is considered normal and acceptable for members of a social group, such as the amount of food or specific food choices (Baril et al., 2012; Grundy et al., 2022; Nyborg et al., 2016; Robinson et al., 2014; SAPEA, 2020). Such an approach is highlighted in the recent report of the European Commission's Group of Chief Scientific Advisors, which recommends policy interventions aimed at “exploiting peer influence and social environments, which can effectively shape consumption choices” (SAM, 2023).

Social environments differ between social groups which means mainstream culture and social representations are not perceived in the same way by everyone. Perceptions of products (e.g. organic food) and behaviours (e.g. vegetarianism) can vary depending on where people are socially positioned (Brocard et al., 2022).

Overall, improving the socio-cultural environment for consumers is a matter of moderating the influences that increase the appeal of unhealthy and unsustainable food choices (e.g. those high in fat, sugar and salt) and supporting those that increase the appeal of healthy and sustainable food choices (e.g. diets in line with dietary guidelines, reducing food waste). It can take the following forms:

- **Limiting exposure to advertising and sponsorship**, particularly targeted at children, of products whose frequent consumption is unhealthy or unsustainable
  - **UK:** restrictions on TV and digital advertising of foods high in salt and/or sugar and the “Food Promotion and Placement Regulation”, which restricts the promotion of products high in fat, salt and/or sugar at sponsored events and in certain locations (CS)
- Defining the rationale of **public promotion programmes** to promote those foods whose consumption would increase as part of a healthy and sustainable diet
  - **France:** campaigns by the national Agency for Organic Agriculture and Food (Agence Bio) (CS)

<sup>10</sup> For example, allowing the use of names that indicate the expected taste and type of use, such as “plant-based sausages”.

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- **Organising the support of opinion leaders** to communicate messages and narratives promoting sustainable and healthy food practices in different social groups, to set (new) social norms and to mobilise broader support in societies
- **Finland:** public health intervention (North Karelia project) uses local opinion leaders to promote new consumption habits/norms (CS)
  - **Netherlands:** multi-pronged strategy to reduce food loss and waste along the value chain, including households, e.g. through interventions addressing social norms (Garcia Herrero et al., 2023)
  - **Denmark:** New Nordic Diet public policy conducted, which mobilised chefs and private actors around new dietary practices (Micheelsen et al., 2014).

Greater coherence can also be achieved by linking interventions that address different dimensions of the food environment, recognising that measures in one area can be reinforced by others. For example, social policies can be mobilised to improve the affordability of healthy food in schools, while the development of value chains can increase the availability of certain products, such as fruit, vegetables or legumes, while marketing and education policies can improve the appeal of healthy and sustainable diets.

### 3 Success factors for developing and implementing demand-side food policies

Developing food policies that support changes towards healthy and sustainable consumption is often perceived as difficult. A number of studies have analysed the barriers to successful demand-side food policies and how they can be overcome.<sup>11</sup>

In this chapter, we discuss selected approaches to three commonly perceived barriers to the development and implementation of demand-side food policies, which are frequently highlighted in the literature and were found to be relevant in our case studies.

1. "Food policy is too politically sensitive: the risk of backlash from citizens or actors is too high."
2. "Integrated food policy is too complex: it is difficult for public authorities to grasp."
3. "There are too many diverging interests: it is impossible to agree on a common direction."

Below we reflect on the relevance of each issue and identify some of the success factors and enablers for addressing them, including examples. Where the

success factor in question has been observed in one of the case studies in this report, we will indicate this by adding "(CS)".

#### 3.1 Responding to food and diets as politically sensitive issues

##### 3.1.1 Legitimacy of demand-side food policies

Food is an integral part of cultural identity and social life. Eating habits are fundamentally individual, deeply linked to traditions, customs, personal history, identity and belonging. Attempts to change these practices through policy are sometimes perceived as a restriction on personal freedom. The high level of media attention given to food issues in general often reinforces this perception. This can prevent political actors from demanding or implementing effective measures. As a result, policymakers often favour information and education instruments, which create less tension in this respect, but have little impact without broader changes in the food environment.

The argument that personal freedom would be restricted by creating fair food environments is rather weak for two reasons. First, this argument overlooks the fact that there is already no "free choice". Instead, many aspects of the food environment are influenced by companies along the food chain, including advertising, product placement, the location of retail outlets, pricing policies and product composition. Other aspects are already influenced by government action, in particular information and labelling policies, but also differential food taxation, consumer protection and food safety issues. However, government influence is often not used sufficiently to develop fair food environments.

11 For example, the EU Healthy Food Environment Policy Index (Food-EPI) not only identifies key food environment policy domains, but also includes six "infrastructure support domains" (leadership, governance, funding and resources, monitoring and intelligence, platforms for interaction and health-in-all-policies). Lobczowska et al. (2022) conducted a meta-review that identified key determinants that occur in the implementation process of policies promoting healthy diets (e.g. costs, individuals' knowledge and beliefs, implementation climate, external policies and networking with other organisations), while Loffreda et al. (2023) identified strong governance and leadership, conflict management, political accountability and policy evaluation and monitoring as key facilitators for the implementation and adoption of cost-effective interventions. (Fesenfeld et al., 2023) emphasises the potential of deliberative food system governance, science-policy interface and effective policy sequencing to accelerate food system transformation. Termeer et al. (2018) highlight five principles for effective and holistic food system governance: system-based problem framing, connectivity across boundaries and inclusion of non-state actors, adaptability, inclusiveness and transformative capacity.

Second, surveys regularly emphasise consumers' intention to eat healthier and more sustainably (BEUC, 2023; EIT Food, 2024). However, current food environments prevent these positive attitudes towards healthy and sustainable eating from being translated into everyday life.

Furthermore, a narrative that only recognises the importance of personal freedoms fails to acknowledge the impact of individual food choices on others. It ignores public interest objectives such as improving public health and reducing healthcare costs; reducing the environmental impact of the food system and adapting to changing ecological conditions; increasing food security and reducing inequalities.

This makes the state an important and legitimate actor (IPES Food, 2020; SAPEA, 2020, 2023; WBAE, 2020). The question is therefore not whether policy interventions on food consumption are legitimate, but how context-specific interventions can be designed to achieve their public objectives with minimum restrictions on individual freedom of choice.

In this respect, public interventions that create fair food environments represent an important paradigm shift in food policy – a policy that no longer relies solely on the “responsible consumer”, but helps making the healthy and sustainable choice the easy and attractive choice.

### 3.1.2 Gradually sequencing interventions

The success of implementing integrated food policies benefits from moving stepwise towards more transformative measures. In this context, sequencing interventions in the food system over time can help secure political support and reduce resistance to new measures, for example through incentives and support for innovations. Sequencing creates the conditions for the emergence of new interest groups and coalitions that benefit from policy changes and will then provide support to more ambitious policy changes (Fesenfeld et al., 2023; Fesenfeld et al., 2022).

- **Germany:** As part of the government's policy to promote alternative proteins, an “Opportunity Programme for Farms” was set up in 2024 that specifically supports farmers who want to switch from animal husbandry to the production and processing of innovative proteins and climate-friendly foods (CS).
- **Netherlands:** The Netherlands has established a national protein strategy that sets the framework for investment in research, innovation and development, as well as a regulatory framework to support commercialisation (CS).
- **Denmark:** As part of a 2021 agreement on the green transition of the agricultural sector, the government has earmarked 170 million euros between 2022 and 2030 for the development of plant-based foods, including a grant to support innovation in the industry, a strategy for green proteins for food and feed and an Action Plan for Plant-based Foods (CS).

## 3.2 Dealing with the complexity of integrated food policies

Integrated food policies involve different policy areas at different levels of governance. However, in most cases, the institutions, the division of responsibilities and the governance structure are not adapted to deal with this complexity, which hinders more coherent policymaking. Ways to deal with this complexity are:

- governance arrangements to link food policy across sectors and departments
- the development of policy packages and
- data collection, monitoring and evaluation.

### 3.2.1 Governance arrangements to link food policy across sectors and departments

A number of governance arrangements have been put into place to better link food policy across sectors and departments, including cross-government thematic groups, multi-stakeholder advisory groups, dedicated units or the reorganisation of ministerial portfolios (Parsons, 2022). The establishment of overarching

food strategies is also a mechanism to facilitate the involvement of a wide range of stakeholders (see Chapter 4). Examples of governance arrangements to support more integrated food policies include:

- **Germany:** As part of its national food strategy, the German federal government has established an inter-ministerial working group to discuss measures and implement the food strategy (CS).
- **Austria:** The country has established a public “Service Centre for Sustainable Agri-food Systems”<sup>12</sup> to coordinate agriculture and food issues between the three national ministries of health, environment and agriculture.
- **France:** A new institution, the Secretariat General for Ecological Planning, first established at prime ministerial level, has played a positive role in the process around the 2025 National Food Strategy, particularly in terms of stocktaking, policy mapping and inter-ministerial coordination (CS).
- **Sweden:** The country provides an example of how agencies that support the implementation of public policy can be instrumental in promoting the implementation of food policy at the local level. The Swedish Competence Centre for Public Meals, hosted by the Food Agency, developed national guidelines for school meals, gathered data from municipalities, collected best practices examples and maintained an ongoing dialogue with stakeholders (CS).

### 3.2.2 Development of policy packages

The cross-sectoral nature of integrated food policies calls for policy packages or policy mixes that include different policy instruments (Candel & Pereira, 2017; OECD, 2021; Parsons & Barling, 2021). The 2022 IPCC report highlights that integrated policy packages that are based on a combination of market-based, administrative, information and behavioural policies can

reduce costs and increase acceptance among stakeholders and civil society compared to uncoordinated interventions (Pathak et al., 2022).

Another advantage of policy packages is that they can combine different measures with varying degrees of intervention, which in combination increase overall public acceptance (Fesenfeld et al., 2020; Wahnschafft et al., 2024). For example, a tax on meat or fat could be combined with tax relief on fruit and vegetables or transfer payments to selected groups of consumers (WBAE, 2020). There is a growing number of examples of policy packages in food policy:<sup>13</sup>

- **Denmark:** In 2024, the country announced a Green Tripartite Agreement between government, industry, environmental and agricultural groups, which combines regulatory and incentive-based measures, including a CO<sub>2</sub> tax on livestock farming, a Green Land Fund to set aside 15% of agricultural land for biodiversity-rich uses and new regulations to reduce nitrogen pollution from agriculture (State of Green, 2024). These measures complement Denmark’s measures to increase the production of plant-based proteins (CS, Parsons & Barling, 2021).
- **UK:** The country’s Childhood Obesity Plan, includes, for example, a ban on price promotion for products high in fat, sugar and salt, a levy on the soft drink industry and restrictions on advertising (CS, Parsons & Barling, 2021).
- **Finland:** The country’s public health intervention uses a community approach that combines levers to address social norms, industry product formulation and individual competences (CS).
- **Sweden:** Sweden started using a supply-demand approach to promote organic food, including setting a target for organic consumption in public procurement as early as 2006 (CS).

Although these examples are very different, what they have in common is that they mobilise different policy instruments and a wide of actors in the food system towards the same goal(s).

<sup>12</sup> For Austria there is no case study in this policy brief. More information about the Austrian “Servicestelle für nachhaltige Lebensmittel- und Ernährungssysteme” can be found at [https://akademie.ages.at/aufktaktveranstaltung\\_sustainable\\_food\\_systems](https://akademie.ages.at/aufktaktveranstaltung_sustainable_food_systems).

<sup>13</sup> Reports such as Parsons & Barling (2021) and SAPEA (2020) provide additional insightful examples of policy mixes across Europe.

### 3.2.3 Data collection, progress monitoring and evaluation

A third key factor in managing the complexity of integrated food policies is the role of data collection, progress monitoring and evaluation. They are essential to assess the status quo and the impact of policy interventions and to facilitate a learning policy design. As many of the required policy measures are relatively new and “bundled” in different policy constellations, continuous evaluation and adaptation of food policy is particularly important. It provides feedback on the impact of individual policy instruments as well as complex policy mixes. However, data on the state of the food environment at EU level is generally scarce, often not standardised and sometimes non-existent, as shown in a recent JRC report (Tóth et al., 2024). It is therefore important to start collecting these data at member state level and for governments to support harmonisation at EU level (see Chapter 4 on monitoring and Chapter 5 on EU policies). Examples of public policies that represent a step towards collecting relevant data to improve food policy include:

- **EU:** The [EU Food System Monitoring Dashboard](#), produced by the European Commission’s Joint Research Centre, provides information on five dimensions of the food environment for all EU Member States.
- **UK:** The government has set up the [Food Data Transparency Partnership](#) to work with the private sector and other stakeholders to increase the quality, quantity and operationalisation of food data for environmental sustainability (e.g. farm data, imported products, Scope 3 reporting, etc.).

## 3.3 Managing diverging interests

Food policy is of interest to a wide range of stakeholders in the food system, including private actors (farmers, industry, retailers, food service providers, investors, insurance companies, traders, etc.), public authorities and policymakers at different levels and civil society organisations (environment, consumer

protection, health, water, animal welfare, etc.). Various examples in the literature show that among these actors, food industry representatives and retailers have been reported as the main actors involved in ways that hinder or delay both the adoption and implementation of food-related public health policies (Clarke et al., 2016; Croizean et al., 2016; Loffreda et al., 2023; Sacks et al., 2018), including attempts to introduce taxes on sugar-sweetened beverages and efforts to develop and implement nutrition and environmental labelling.

Implementing demand-side food policies therefore requires careful design of stakeholder engagement and collaboration processes, as described below.

### 3.3.1 Stakeholder engagement processes

Stakeholder engagement, whether on a specific policy (e.g. labelling) or a broader framework (e.g. a food strategy), is a key success factor for demand-side food policies (Bock et al., 2022; FAO, 2023a; SAM, 2023).

When starting stakeholder engagement, it can be helpful to first map the relevant stakeholders that may be involved. This process can help to understand the power dynamics between actors (FSEC, 2024; Loffreda et al., 2023) as well as power asymmetries (SAM, 2023). In particular, actors in the middle of the chain, such as retailers and the food industry “tend to hold more power than other actors in the food system” (SAM, 2023, p. 15). The mapping should take into account relevant groups that are not yet close to the food policy decision-making process, such as local authorities, trade unions, organisations representing people that are affected by food poverty, health professionals, food policy councils and so on.

The policymaking process generally consists of three phases: a consultation phase, a policymaking phase and an implementation phase. In each phase, stakeholder participation processes may have different uses and objectives (Cullerton et al., 2022; Dentoni et al., 2018; HLPE, 2018; OECD, 2021). Depending on the

phase of the policymaking process, different actors may be involved, while ensuring that policy capture by special interests is avoided.

Examples of stakeholder involvement can be found in our case studies:

- **France, Germany, Switzerland:** Citizens' assemblies show the value of including the voice of citizens and illustrate the often strong public support for certain policies, which can help set the agenda or support a policy choice.
- **UK:** The UK case study highlighted the role of an independent review conducted in 2021 to inform the National Strategy. It provides a positive example of consulting a wide range of stakeholders, including citizens through the organisation of events in their region, and the ongoing involvement of parliamentarians from all parties to build political support for the measures.
- **Germany:** Finally, the German case study highlights a successful format for stakeholder collaboration to build a common vision between groups with divergent interests within the Commission for the Future of Agriculture (ZKL), which showed the added value of involving independent researchers in the process.

An inclusive stakeholder process depends on a **good facilitation** and organisation to support the negotiation of trade-offs between all stakeholders. It therefore places a heavy responsibility on the public institutions organising the process. Structurally, different constellations are possible: In some cases, members of the authorities facilitated the process, in others, members of parliament were involved. In Germany and the UK, external actors facilitated the development of the food strategies.

The review of the selected examples points to the prominent role of facilitators who are perceived as neutral and unbiased – which is more often the case when the facilitators are not from the institution coordinating the process.

### 3.3.2 Developing collaboration along the food chain and across sectors

Ensuring the participation of all stakeholders in the successful implementation of an integrated food policy may require the development of collaboration and partnership formats. There are a number of examples that show the variety of successful collaboration formats:

- **Netherlands:** To prevent food waste, the country has set up a public-private partnership, Food Waste Free United, which brings together 125 stakeholders to better monitor waste, share best practices and achieve waste reduction targets (CS).
- **Denmark:** The “Danish Wholegrain Partnership” is a partnership between public authorities, health NGOs and the food industry (especially the bread industry) that combines product reformulation with communication and education, effective marketing in retail, dietary guidelines and monitoring and evaluation (SAPEA, 2020).
- **France and the UK:** There are a number of examples of cross-sectoral collaboration with policymakers on local level. These include the multi-sectoral “food partnerships” in the UK (CS) or the example of the *Projets Alimentaires Territoriaux* (Territorial Food Projects) in France (CS), which aim to support the establishment of multi-stakeholder local food strategies through a government-led framework and funding (Liu, 2024).

## 4 The role of food strategies as tools for developing demand-side food policies

In the above, we have identified the different dimensions of effective food policies, listed which measures are important to support the development of fair food environments and identified general success factors for the elaboration of demand-side food policies. This chapter proposes to focus on a specific tool for designing and guiding the implementation of demand-side food policies: food strategies.

### 4.1 Experiences with food strategies in European countries

Over the years, several Member States have developed multi-sectoral food strategies: Sweden and Finland were the first to adopt a strategy in 2017, followed by Scotland (2018, 2022), Ireland (2021), Germany (2024), Northern Ireland (2024), Austria (2024) and Spain (2025). France is currently in the process of developing its national food strategy. Other European countries (e.g. the UK in 2022, Switzerland with its Nutritional Strategy in 2017 and Climate Strategy for Agriculture and Food in 2023) have also started work on more integrated food strategies. These strategies vary considerably in terms of the policies proposed, focus within the food system, ambition, impact and overall comprehensiveness.

Food strategies can be useful in establishing the necessary stakeholder exchange, gathering information to understand the problems and opportunities of the food system, providing a political opportunity for coalition building and creating a space to negotiate distributional effects, policy sequencing and policy packaging.

Our analysis of eleven European countries, including nine EU Member States, demonstrates that these emerging food strategies can facilitate the development of demand-side food policies. The cases of Germany and the UK illustrate how national food strategies can provide a coherent and strategic framework for policymaking. Depending on the participatory process, its facilitation and the management of contentious issues, establishing a strategy can also increase stakeholder buy-in.

However, the analysed national food strategies often lack appropriate implementation measures and do not consistently follow an integrated approach. For example, the 2017 National Food Strategy for Sweden has a strong agricultural focus, while the 2019 French Programme for Food is restricted to consumer education, public procurement and local action when it comes to environmental sustainability. Others “lack teeth” in that they do not set specific, quantified targets and lack the necessary budget to implement the planned measures (as is the case in Finland and Germany, for example). However, we also found that food policy coherence and progress are not necessarily contingent on a formal food strategy. Denmark, for example, does not have an explicit food strategy, yet its food policies are relatively well-developed and coherent across sectors.

To highlight the diversity of approaches to integrated food policy in selected European countries and the different roles of food strategies within this process, Table 2 below provides an overview of the 11 country case studies analysed in this policy paper.

We then identify the key elements in the process of developing and implementing an integrated food strategy.

Overview of selected European countries on their progress towards integrated food policies at national level, including the role of food strategies → Table 2

Country	Progress towards integrated food policies at national level
Denmark	Denmark's food policy consists of several independent but related food policy initiatives led by the Ministry of Food, Agriculture and Fisheries. There is no comprehensive food strategy. Since the 1990s, food policy has focused on promoting organic products, food safety, health and animal welfare. In the 2020s, the climate and land use impacts of food have emerged as an important issue in promoting sustainable food production and consumption, with recent initiatives including climate-informed dietary guidelines, the use of climate data in public procurement and the promotion of plant-based foods.
Finland	The Finnish government published the first National Food Strategy (for 2030) in 2010, which was updated in 2016. It aimed to improve competitiveness, promote healthy diets and combine support for domestic production with demand-side measures through a more comprehensive food policy. The development of the strategy was led by the Ministry of Agriculture and Forestry and promoted greater cross-sectoral collaboration between administrations, as a first step towards a more integrated food policy. In 2023, the government set up a working group to develop a third National Food Strategy (for 2040), with a stronger focus on domestic food production, but also with the aim of incorporating sustainable development in a comprehensive and up-to-date manner. In practice, however, food policy remains rather siloed in different policy domains.
France	France has had a Health and Nutrition Plan since 2001, a French Food Plan (public procurement, education, waste, local, gastronomy) since 2010 and a National Pledge for Food Waste Reduction since 2013. The first is managed by the Ministry of Health while the others are administered by the Ministry of Agriculture. The plans are sectoral strategies that lack an overarching framework. Other policies, such as organic farming, are dealt with separately. The government is currently developing a National Strategy for Food, Climate and Nutrition, which will provide a vision and direction for the Health Plan and the Food Plan (both of which will remain active). Stakeholders will only be formally consulted after a first draft is published in April 2025.
Germany	Germany has a number of sectoral strategies and policies that contribute to different aspects of sustainable food systems, such as reducing food waste or increasing organic farming. In 2024, the German government published a Federal Food Strategy that takes an integrated approach to food policy. It provides a comprehensive set of strategic long-term goals and recognises the key role of fair food environments. However, the strategy would be more effective if supported by a concrete implementation plan and an adequately funded implementation budget.
Poland	Poland does not have a cross-sectoral food strategy at national level. Food policy is mainly considered through the lens of agricultural and health policy. In 2021, the Ministry of Health published a National Health Plan 2021-2025 in which the prevention of overweight and obesity is one of the main objectives. Poland also has several social policies aimed at tackling food poverty.
Portugal	Portugal does not yet have a comprehensive food strategy. The main guiding plan is the National Programme for the Promotion of Healthy Eating which has been running since 2012. It focuses on promoting healthy and nutritious diets, tackling childhood malnutrition and social inequalities. Although legislative measures have been introduced to promote sustainable and healthy diets, a fragmented governance approach in Portugal has missed the opportunity to link agricultural, environmental and climate, health and land access elements, which are key to developing a holistic food policy strategy. Importantly, this national programme plays a significant role in addressing public procurement and promoting plant-based diets, particularly from a consumer perspective, which is an important step towards a more integrated approach to food policy.
Sweden	Sweden adopted its first National Food Strategy in 2017. It emphasises competitiveness and food production but also encompasses other objectives, including sustainability. The Ministry of Rural Affairs and Infrastructure is the responsible ministry, with several government agencies also playing a role in its implementation. The impact of the strategy has been analysed as limited, e.g. in terms of achieving relevant environmental objectives and healthy diets. A possible contributing factor is the lack of a strong common vision among government actors that would support a coherent food policy. In 2023, the government announced an update of the strategy to focus on improved robustness in the food chain, exports and Swedish quality and gastronomy, which was published in March 2025.

Country	Progress towards integrated food policies at national level
Switzerland	Traditionally, food policy debates in Switzerland have focused either on demand-side health-related nutrition strategies or on supporting domestic agricultural production, its environmental impacts and self-sufficiency, rather than taking a more holistic food system approach and linking these perspectives. The resulting policy mix is not yet systematically integrated into a coherent food policy strategy but addresses similar objectives with different approaches, indicators and time horizons. In recent years, however, sustainability and broader food system perspectives have become more salient in policy debates, leading to discussions on an integrated food system policy, notably in the context of the Climate Strategy for Agriculture and Food, the new Swiss Nutritional Strategy 2025–2032 and the current reform of Swiss agricultural policy.
Spain	Recent food-related policies in Spain have focused on relationships within the food chain, food prices and waste reduction. However, there is growing momentum for food strategies and policies at regional and local levels. In addition, the government has just developed a National Food Strategy, covering a range of issues from sustainability and food security to nutrition and rural areas. It was published in February 2025.
Netherlands	The Netherlands started early to address sustainable food production and consumption through strategic documents and policies. In 2009, the Netherlands published “Sustainable Food”, a strategic document outlining its vision for sustainable food for the next 15 years. Thematic priorities included reducing land and resource use, minimising emissions, improving animal welfare and reducing food waste. Building on this foundation, the 2015 Food Agenda for Safe, Healthy and Sustainable Food broadened the government’s focus. Developed through inter-ministerial collaboration, it emphasised the interdependence of health, sustainability and food security. The policy documents have mainly been used to define priority issues within existing funding schemes, e.g. for research policy. Food policy in the Netherlands primarily follows a collaborative approach between the public and private sectors, with partnerships with businesses and civil society organisations becoming central to policy implementation.
UK	The UK Government published its Food Strategy in 2022 that takes a food system approach. It follows publication of an independent review in 2020 and 2021 that proposed a diagnosis and recommendations on health, inequalities, agriculture and food culture after extensive consultation of experts and citizens. The Government Food Strategy is considered less ambitious and comprehensive than the review. Although it had cross-departmental buy-in, it lacked legislative grounding and a means to assess progress. The Strategy’s commitments and actions focus on England while Wales, Scotland and Northern Ireland have their own policies and strategies. However, the Government Food Strategy introduces a very useful set of indicators on, for example, household food insecurity as part of the Food Security Index.

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## 4.2 Steps in the development of food strategies

While there is no universal “recipe” for developing food strategies, reflection on the processes involved in their development suggests that certain core elements are required.

The following steps should be seen as guidelines for action, not as a strict chronological sequence. Rather, all steps are closely interlinked and iterative. Stakeholder involvement (see also Chapter 3) is a cross-cutting issue in all steps.

There are different ways of starting the process of developing a food strategy. In most of the examples we have seen, a public institution, such as the ministry of food and agriculture or the ministry of health, has initiated the process, usually in a context of growing attention to food policy also by actors from civil society, academia or the private sector.

The following overview of steps and success factors is based on publications dealing with the set-up and design of better food policies and food strategies, including the role of stakeholder involvement (Baldock & Hart, 2021; OECD, 2021; Parsons, 2019; TSE,

2022; UNFSS, 2021; WBAE, 2020, p. 202; Wunder & Jägle, 2022). We also include insights on the development of regional food strategies, as there is a growing body of research reflecting on the experience of the last decade in setting up local food strategies and food policies, mainly catalysed by the 2015 Milan Urban Food Policy Pact<sup>14</sup> (FAO, 2018; Food Trails, 2021; Foster et al., 2016; IPES Food, 2017; Wunder, 2019). The review also includes findings from the case studies and background interviews presented in this policy brief. Overall, however, there is little academic literature to date that provides a structured analysis or evaluation of the development of food strategies, particularly at the national level.

## 1. Understanding the status quo, defining objectives and mapping stakeholders

Countries have different starting points for developing food strategies. These include, for example, the role of diet-related diseases and their impact on the national health system; the agricultural sector, including the relevance of particular production systems; the current and intended contribution to environmental sustainability; and how many people are affected by food poverty – to name but a few.

As a first step:

- Understand the baseline situation through an initial **stocktaking**: What policies are in place? What is known about their (cost) efficiency? Where are the problems, what are the expected trends? What are the key issues for improving the food system in the country? To do this, existing data on the national food system (in the relevant areas of health, agriculture, trade, environment, industry, etc.) need to be reviewed. In some cases, the work of scientific institutions and/or scientific councils had been crucial to the stocktaking (as the examples of the Netherlands, Germany, the UK and

Switzerland show). The Healthy Food Environment Policy Index, developed by the Policy Evaluation Network (PEN Consortium, 2021) can be a helpful starting point, as can the [EU Food System Monitoring Dashboard](#) provided by the European Commission.

- **Stakeholder mapping** identifies the most relevant actors working on the key issues, who will be affected (including potential winners and losers of policy changes), and who are and can be strong actors/influencers (including public and private sector as well as NGOs, associations and civil society).
- **Defining overarching goals** – supported by different consultation processes (e.g. stakeholder fora or citizens' assemblies – as used in Switzerland, Germany, the UK, France, etc.) and in line with pre-existing commitments at EU or international level (e.g. Sustainable Development Goals, Paris Agreement, Fit for 55, International Covenant on Economic, Social and Cultural Rights, European Child Guarantee, etc.).

## 2. Setting the agenda, prioritising areas for action

In a next step, areas for action are prioritised on the basis of the data collected. In many cases, this process will reveal that data still needs to be collected or analysed (e.g. on public food procurement, food poverty or food waste).

At the same time, it will be identified which key policy instruments with food relevance already exist in the different institutions and ministries within the priority areas for action. This will help to determine potential synergies, trade-offs and controversies that need to be managed when defining measures for the selected priority areas (see Step 1).

## 3. Formulating policy, identifying suitable measures

Based on the priorities identified, concrete and time-bound objectives will be set and measures defined in an action plan. Planning for implementation is

<sup>14</sup> The Milan Urban Food Policy Pact – a legacy of the EXPO 2015 Milan – is an international agreement between cities, committed to developing sustainable food systems. It has been signed by over 200 cities from around the world. More than a declaration, it is a concrete working tool for cities and includes a framework for action.

important, given the often-observed problem of (food) strategies staying at the level of setting objectives and creating a vision.

There is a range of suitable and possible policies and measures, as shown in Chapter 2. To increase the likelihood that appropriate measures will be implemented, it is helpful to calculate their approximate costs in ex-ante impact assessments, as was done for the English food strategy “The Plan” (see UK case study), and to agree on the range of budgets available.

While new policies and measures may be needed in many areas, it is equally important to adapt existing policy instruments in different policy areas (e.g. health, agriculture, education, economy, environment, consumer protection, social affairs, research, etc.) in order to improve policy coherence. It is also relevant to take into account other policy levels such as the EU and regional levels, to support a mutually reinforcing policy framework (see Chapter 5).

#### 4. Implementing policies and measures

The next phase is the implementation of the strategy, or the process of putting the agreed measures of the strategy into effect. There are a number of challenges that lead to discrepancies between the objectives of a policy, its implementation and its outcomes (see e.g. Lobczowska et al., 2022; Loffreda et al., 2023; Moschitz et al., 2021). While these cannot be covered in detail in this policy paper (see also Chapter 3), we would like to highlight two aspects for consideration in the implementation process, based on the review of existing national food strategies:

- As food strategies are often designed as non-binding documents, the strategy should also consider which elements can be given legal status. Legal frameworks can guide food policies and actions over time, regardless of political changes

or shifting priorities. In the UK, for example, an previous food strategy was shelved when a new government came to power. As a result, the UK’s independent review for a “National Food Strategy”, which provided the recommendations for the “Government Food Strategy” (see UK case study), recommended a “Food Bill” However, this has not yet been taken up by the government.

- As many policy instruments (particularly within a policy mix) do not have sufficient evaluations of their effects, it is important to design the set-up of the measures and projects in such a way that monitoring of their effects is built in from the beginning (see also next step).

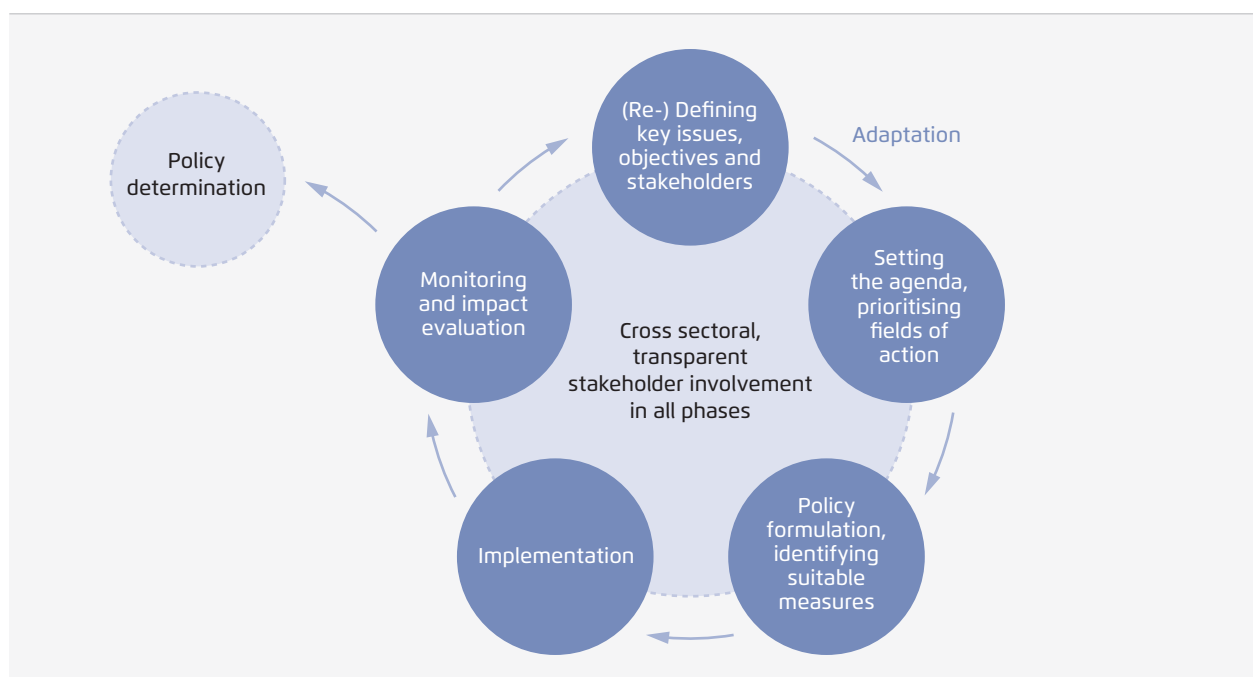
#### 5. Monitoring progress, evaluating impact

In order to demonstrate the effectiveness of the measures taken under the food strategy, it is necessary to monitor selected indicators. The results of monitoring will provide the basis for further developing, adapting and improving policy instruments and, where necessary, addressing inconsistencies between instruments (see Figure 4). Examples of continuous monitoring that has informed policymaking include the Danish case of using climate data in procurement and labelling, the Dutch policy on food waste and the French monitoring of health (e.g. Nutri-Score, soda tax) and social (e.g. food aid) policies.

In parallel, a food strategy process is supported by the establishment of **pilot projects**, which can act as “door openers” or “starter projects”, providing initial visible results and a sense of achievement. They can encourage stakeholders and policymakers to take further action and provide a first practical experience of cross-sectoral and multi-stakeholder collaboration. If they include a research component, such pilot projects can also help to collect data and build evidence on the (in)efficiency of a policy, which can then inform the adaptation of existing policies or the scaling up of a new type of intervention.

## Core elements and steps in the set-up of a food strategy

→ Fig. 4



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### 4.3 Reflections on the possible role of a food strategy

As discussed above, national food strategies can play an important role in developing coherent food policies that integrate demand- and production-side measures and contribute to building fair food environments.

They are neither a prerequisite nor a guarantee for an impactful food policy, but the process of developing and implementing a food strategy can provide many of the success factors described above for the implementation of a successful food policy mix.

Most importantly, the development of national food strategies provides the space for different actors in the food system to negotiate and agree on a common vision, objectives and implementation plan. In addition, if food strategies include frequent monitoring and review of the measures set, they contribute to the further development of effective policies. Finally, setting up food strategies provides an opportunity

to assess the suitability of governance structures for integrated food policies. They can therefore provide the space for the establishment of coordination structures between government departments and/or stakeholder councils, both of which can help in the elaboration and implementation of the food strategy.

However, there is a risk that food strategies will remain weak documents that set out goals and visions but lack an action plan and a budget and/or staff to support implementation. In this respect, political support for the strategy is crucial, as is building staff capacity and conducting cost assessments for implementing the measures. Another potential disadvantage of setting up food strategies is that during the often time-consuming development process, no progress is made in adopting and implementing policy measures – with the risk that the development of a food strategy becomes an excuse for policy inaction. It is therefore recommended that a food strategy process be accompanied by the establishment of pilot projects (see Chapter 4.2).

## 5 How EU policies can support the adoption of demand-side measures for more integrated national food policies

While responsibility for food policymaking is largely shared between Member States and the EU, national policies are often better suited to tailor food policies to specific regional and local contexts and circumstances. At the same time, action at EU level can play an important role in supporting Member States in advancing such policies.

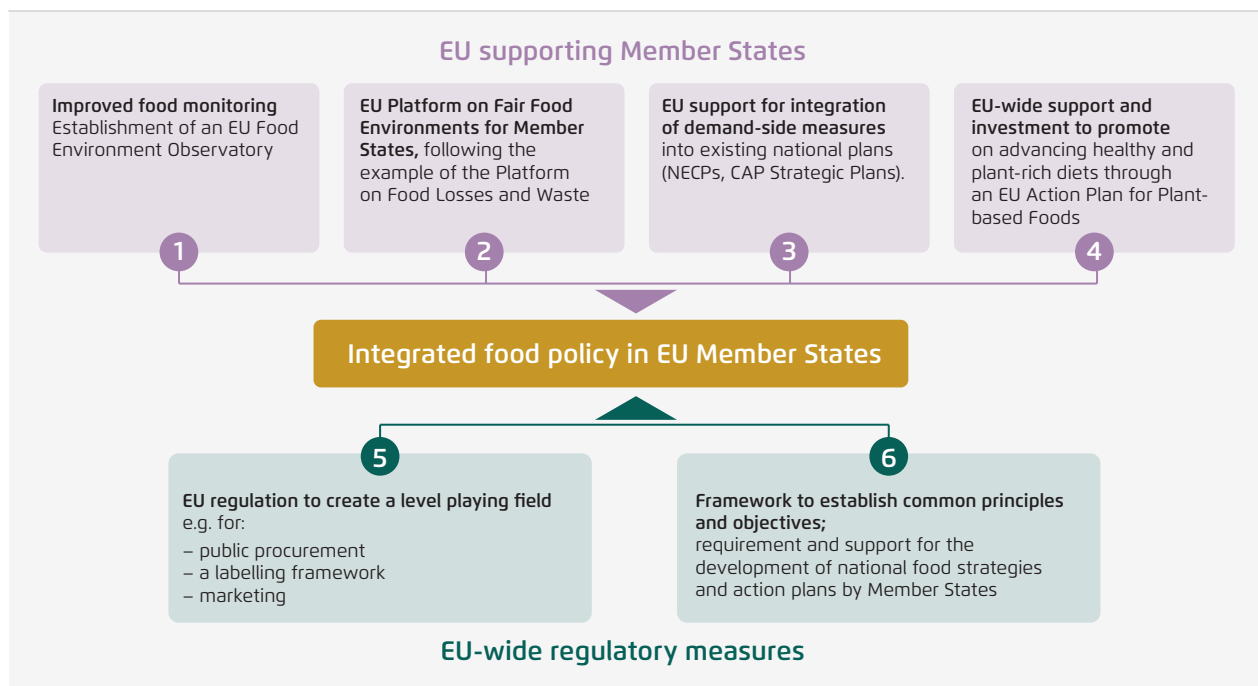
The following chapter first presents an overview of the general evolution and current state of integrated food policies at EU level. It then examines options for EU policymakers to support demand-side policies, in particular those that support the development of fair food environments in Member States. These options are structured around two key mechanisms (see Figure 5):

- A. establishing processes and supportive frameworks that encourage Member States to develop and improve demand-side measures for more integrated food policies (including four key entry points for policy)
- B. adopting EU-wide regulatory measures in areas where action at the European level can add particular value, such as creating a level playing field across the internal market (including two more entry points for policy).

We describe different EU entry points that differ in policy ambition but are not mutually exclusive. On the contrary, they can be implemented together or as stand-alone elements. They can also be sequenced to generate positive feedback loops and further

Key areas for EU policy to support Member States

→ Fig. 5



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transform food environments. We include references to two recent EU strategic policy documents: the results of the Strategic Dialogue (European Commission, 2024b) and key points of the EU Vision for Agriculture and Food (European Commission, 2025), to illustrate where there is overlap with the ideas presented in this policy paper.

## 5.1 Development of an integrated food policy approach in the EU

At EU level, the **Farm-to-Fork-Strategy** (COM/2020/381), published by the EU Commission in 2019 as part of the Green Deal, was the first EU strategy to develop a more integrated view of the different objectives of food system sustainability, including impacts on the environment, health, food safety and “fairer economic returns”. Although the Farm-to-Fork Strategy started to anchor a holistic vision for sustainable food systems at EU level, it did not set targets related to food consumption. Moreover, many of the announced policy initiatives have been delayed or stopped. One of its most important initiatives, the “Legislative framework for sustainable food systems” – scheduled for adoption in 2023 and presented as one of the key deliverables of the Farm-to-Fork Strategy – has not yet been published. Early drafts of the proposed legislative framework<sup>15</sup> included an option to require Member States to develop and implement national food strategies to ensure coherent implementation of the building blocks of the proposed legislation within national policy contexts.

Later, and partly in response to farmers’ protests that began in 2023, European Commission President von der Leyen launched the **Strategic Dialogue** on the Future of EU Agriculture in January 2024, with the aim of reaching a common understanding and vision for the future of the EU’s farming and food systems. The forum brought together 29 stakeholders from Europe’s agri-food sectors, civil society, rural communities and academia. The final report, published in September 2024, provides an assessment

of the challenges and opportunities, followed by a set of recommendations. Among the many recommendations, it also called the European Commission and Member States to “adopt demand-side policies, which address agri-food systems as a whole, to create enabling food environments where balanced, less resource intensive, healthy diets are available, accessible, affordable, and attractive” (European Commission, 2024, p. 12).

The third and most recent process at EU level was the publication of the **Vision for Agriculture and Food**, proposed by President von der Leyen as a priority initiative for the first 100 days of the new Commission’s mandate and published in February 2024. Building on the report of the Strategic Dialogue on the Future of EU Agriculture, the Vision aims to ensure the long-term competitiveness and sustainability of the EU’s agriculture and food sector.

In contrast to the results of the Strategic Dialogue, the Vision for Agriculture and Food (European Commission, 2025) is less concerned with integrated food policies and provides few strategic entry points for promoting healthy and sustainable diets. However, it does recognise the need to

- improve “favourable food environments” (p. 22)
- “provide the right incentives to promote the consumption of local, seasonal products, and food produced with high environmental and social standards, including organic products and food originating from shorter supply chains” in public food procurement (p. 23)
- “monitor the effects of certain advertising and marketing practices of food” (p. 23)
- “develop a comprehensive plan to ... integrate policy ... to create a more self-sufficient and sustainable EU protein system” (p. 11)
- “reduce food loss and food waste” (p. 24)
- “deliver healthy, affordable and sustainable food to EU citizens” (p. 18)
- “realise the innovation potential in the food system” (p. 18)
- support dialogue around “food reformulation, collection of data on dietary intake and food affordability” (p. 24)

<sup>15</sup> Often also called “Sustainable Food Systems Law” or “SFS Law”.

It also suggests that “changing societal expectations with regard to food hold opportunities for the sector” and sees a role for the EU Commission to “promote the exchange of best practices and monitor the way food poverty is addressed in Member States”, for example through an annual Food Dialogue.

Overall, demand-side interventions are not the focus of the vision, although it provides a number of entry points for improving food policies.

## 5.2 Developing a supportive framework for Member States

EU policy can provide a supportive framework for Member States to establish and improve demand-side measures for more integrated food policies. As outlined below, there are four key areas:

1. Improving food monitoring
2. Supporting collaboration on and implementation of integrated food policies in Member States through an EU platform
3. Integrating sustainable food system objectives and principles into existing national strategies
4. Providing EU-wide support and investment to promote healthy and plant-rich diets.

### 1. Improving food monitoring

While some food-related indicators already exist at the EU level and in individual Member States, improved EU-wide monitoring is still needed in many areas. To determine the most useful new indicators and provide a framework for making them available and comparable across Member States, the EU could establish an EU Food Environment Observatory to collect and disseminate information on the state of the food environment in each member state. Indicators will be needed for all dimensions of food environments, which is likely to require new indicators, for example on household food insecurity, the quality of public food procurement and the physical food environment.

The data collected and presented by such an Observatory would provide the basis for comparisons between and within Member States and a foundation for monitoring the outcomes of national food strategies.

In light of the discussions on an “agriculture benchmarking system” proposed in the Strategic Dialogue (2024), the establishment of such an Observatory would provide an opportunity to move beyond on-farm sustainability assessments and indicators by linking the supply and demand dimensions, thereby including actors further downstream in the food chain.

In addition, the EU Vision for Agriculture and Food highlights the need for oversight in two areas: First, it emphasises the importance of monitoring the effects of food companies’ “advertising and marketing practices”. “In particular, the impact on the health and well-being of the most vulnerable groups of consumers, such as children, should be investigated.”<sup>16</sup> Second, it also calls for monitoring and supporting exchanges on how food poverty is addressed in Member States.

### 2. Supporting collaboration on and implementation of integrated food policies in Member States through an EU platform

Our analysis reveals that very few EU countries have established national food strategies and none have yet introduced a comprehensive policy mix to create fair food environments. Establishing an EU platform could facilitate exchange among Member States on the development of integrated food policies and demand-side policies in particular. Such a platform – for example named “EU Platform on Fair Food Environments” – could facilitate the exchange of information among all Member States and selected relevant actors regarding suitable measures, lessons

<sup>16</sup> However, research into the influence of the marketing of foods and non-alcoholic beverages high in fat, sugars and/or salt on children has already been carried out by the European Commission in 2021. See European Commission et al. (2021).

learned in developing national food strategies and the evaluation of success factors for implementing various measures, thereby supporting member state action (Agora Agriculture, 2024; Bock et al., 2022).

The set-up of such a platform could draw on the experience of the EU Platform on Food Losses and Food Waste, which has been active since 2016 and regularly brings together representatives from all Member States, the private sector, NGOs as well as researchers. Following a similar model, working groups could address specific issues, such as developing a system of indicators to support the establishment of monitoring and benchmarking tools.

The platform could serve as a catalyst for coordination across government departments and levels, enhancing coherence between national and European authorities (PEN Consortium, 2021). This would contribute to what the Strategic Dialogue describes as the need for “governance change and new culture of cooperation”, fostering “trust and multistakeholder participation among the actors and within institutions”, ensuring “practicability and consistency between the different policy areas and [overcoming] silo-thinking” (European Commission, 2024b).

For the platform to be successful, it requires sufficient funding to support pilot activities that generate crucial learning for subsequent implementation steps.

The EU Vision for Agriculture and Food contains several references to planned dialogue formats that could provide a starting point for the establishment of an EU platform to support collaboration on and the implementation of integrated food policies. Most importantly: A “Food Dialogue” is announced, to be held every year, “with the food system’s actors, including consumers, primary producers, industry, retailers, public authorities and civil society. This dialogue would be the forum to address pressing issues such as food reformulation, collection of data on dietary intake and food affordability, just to name

a few.” It should “also aim to promote the exchange of best practices and monitor the way food poverty is addressed in Member States by the use of EU and national instruments, including social policies, school schemes and food stamps for the most vulnerable.” Second, it also mentions the “upcoming agri-food Transition Pathway Platform” and the European Cluster Collaboration Platform, which can, for example, “facilitate SME networking”.

### 3. Integrating sustainable food system objectives and principles into existing national strategies

Food policy is closely linked to other policy areas – some of which also require national strategies for EU policy implementation, such as National Energy and Climate Plans (NECPs) and the CAP Strategic Plans. To increase coherence, the EU could support Member States in better integrating the links between these strategies’ main targets and objectives and the principles of sustainable food systems. This particularly concerns measures supporting healthy, plant-rich diets – which are crucial for achieving sufficient greenhouse gas emission reductions (a central focus of NECPs) and have significant implications for farmers’ production perspectives and their necessary support (the focus of CAP Strategic Plans). Recognising the challenges of mainstreaming cross-cutting policy issues into sectoral policies, establishing a cross-directorates institutional structure could be beneficial to support dialogue between Member States and the Commission in the pursuit of more coherence.

While the EU Vision for Agriculture and Food does not refer to the need to mainstream sustainable food system objectives into existing national strategies, it acknowledges the importance of integrating different dimensions of objectives, calling in its vision statement for “a future proof agri-food sector that is functioning within planetary boundaries ... and in line with a One Health approach”.

#### 4. Providing EU-wide support and investment to promote healthy and plant-rich diets

Through strategic support, research and investments, the EU can foster the development of future markets that enable healthy and sustainable diets, particularly regarding the increased consumption of plant foods and protein diversification.

Following the Strategic Dialogue's recommendation that "The European Commission should develop, by 2026, an EU Action Plan for Plant-based Foods to strengthen the plant-based agri-food chains from farmers all the way to consumers", such an action plan could include two pillars:

- an investment plan to support production-side measures, including improved production capacity for fruit, vegetables, legumes, nuts and alternatives to livestock products
- demand-side measures to support and promote plant-based products within the context of a healthy and sustainable diet – going beyond existing initiatives such as the school scheme supporting fruit and vegetable consumption in schools<sup>17</sup>

The EU Vision for Agriculture and Food addresses the issue of plant and animal proteins, considering "both the way protein is produced and consumed in the EU". More specifically, it announces that the Commission will "develop a comprehensive plan to address these challenges, integrating policy, research and on the ground efforts to create a more self-sufficient and sustainable EU protein system, while at the same time diversifying imports." Additionally, while the Vision focuses on competitiveness, resilience and food sovereignty, promoting plant-based foods could contribute to these goals, even though it is not explicitly mentioned.

<sup>17</sup> According to the recommendations of the Strategic Dialogue and "in order to encourage consumers towards healthier and more sustainable diets, other actions can be foreseen, with the involvement of public and private actors, such as the launch of a European wide campaign to raise awareness about the importance of healthier and sustainable choices."

#### 5.3 Adopting EU-wide regulatory measures

A second type of approach for EU policymakers is the adoption of EU-wide regulatory measures where European-level action can add particular value. As presented below, there are two other key areas:

5. Contributing to a level playing field through EU regulation
6. Introducing a framework to establish common principles and objectives

#### 5. Contributing to a level playing field through EU regulation

For many policy areas affecting the food system and food environments, EU-wide action can provide added value by contributing to a level playing field among Member States, thereby reducing distortions to the internal market. Important areas for policy action on food environments where the EU has the competence to act and can provide added value include:

- **Labelling framework:** Implementing a mandatory and harmonised EU front-of-pack nutrition labelling scheme would empower consumers make informed choices.<sup>18</sup> It would also send signals along the value chain, incentivising producers aiming for better rankings to modify their production practices, for example through reformulation and sourcing adjustments. Moreover, improving the date marking of food products (e.g. "use-by" and "best-before" dates) would contribute to reducing food waste and can be regulated at EU level.
- **Health and sustainability criteria in public food procurement:** Establishing EU-wide minimum health and sustainability criteria for public food procurement can leverage its potential to promote both dimensions simultaneously. These criteria can build on the European Commission's voluntary

<sup>18</sup> According to the recommendations of the Strategic Dialogue: "The European Commission should conduct a full review and, where necessary, update EU food labelling legislation."

green public procurement guidelines (European Commission, 2019), particularly regarding the promotion of plant-rich menus.<sup>19</sup> Public food procurement is also a central issue in the EU Vision for Agriculture and Food, with a legislative proposal announced to strengthen its role.<sup>20</sup>

– **Advertisement and marketing environment:**

Several marketing-related issues require specific EU policy attention (see Agora Agriculture 2024: 72), such as the need for a comprehensive regulatory approach to reduce children's and adolescents' exposure to marketing of foods and beverages high in fats, sugars and salt. Health and sustainability criteria should also be applied to the EU's food product promotion policies.<sup>21</sup> The EU Vision for Agriculture and Food explicitly mentions its intentions to address advertising and marketing, such as a) evaluating the EU Code of Conduct on Responsible Food Business and Marketing Practices, including assessing whether further action is needed and b) monitoring the effects of certain food advertising and marketing practices, although an evaluation has already been carried out in 2021 (ECORYS et al., 2021).

19 According to the recommendations of the Strategic Dialogue, the "European Commission should propose a revision of Directive 2014/24/EU on Public Procurement". It also calls for "adequate financial and technical support for public buyers, including the training of staff handling and preparing food in public settings, as well as guidance and training for public tender adjudicators."

20 Specifically, it says: "The Commission will come forward with a legal proposal to strengthen the role of public procurement. Public procurement should pursue a 'best value' approach to reward quality and sustainability efforts made by European farmers, food industry and services, and should provide opportunities for small and medium-sized enterprises (SMEs) to participate in such activities."

21 According to the recommendations of the Strategic Dialogue: "By 2026 the European Commission should publish a report evaluating the effectiveness of current national measures and industry voluntary commitments relating to the marketing to children of food high in fat, sugars and salt, offline and online, and where appropriate, accompany this report with a legislative proposal."

## 6. Introducing a framework to establish common principles and objectives

While the project of establishing a legislative framework for sustainable food systems, as outlined in the Farm to Fork Strategy and initially scheduled for 2023, has been removed from the Commission's 2024 work programme, the need for a common definition of key principles and objectives for sustainable food systems remains.

Therefore, a framework containing two core elements is needed:

- **Defining shared principles and objectives for the EU food system** that link supply- and demand-side dimensions. The agreed-upon principles would be translated into indicators to monitor progress in Member States and guide the design and evaluation of policy instruments.
- **Supporting Member States in establishing national food strategies and action plans** to improve the coherence of food-related policies and develop fair food environments. Such national strategies and action plans could be gradually mandated for Member States. In regular reports to the European Commission, Member States would describe their measures to achieve the framework's objectives and their progress in implementing policies for fair food environments.

The EU Vision for Food and Agriculture does not mention an overarching legislative framework.

In conclusion, EU policy action can mobilise several distinct and powerful levers to support demand-side food policies in Member States (see Figure 5). This in turn has the potential to contribute to addressing health, environmental, food security and strategic autonomy objectives.

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## Publication details

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### About Agora Agriculture

Agora Agriculture develops science-based and politically feasible approaches for a sustainable food, agriculture and forestry sector. As part of the Agora Think Tanks, the organisation works independently of economic and partisan interests and aims to contribute to achieving democratically negotiated sustainability goals such as climate neutrality and biodiversity protection.

### About IDDRI

IDDRI is a globally influential think tank that seeks to create the conditions for a just transition to prosperity compatible with the Earth's capacities. It focuses on two areas of action: international cooperation, and European policies. Created nearly 25 years ago by public authorities, research centres and major French companies, IDDRI is now recognized for its decisive contributions to the major multilateral agreements of the last 10 years (climate, biodiversity, high seas) and for its ability to facilitate multi-stakeholder debates on concrete development pathways compatible with these commitments in key countries and sectors.

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