



# HUNGRY FOR CHANGE

AN EU SUSTAINABLE FOOD SYSTEMS LAW  
FOR PEOPLE AND NATURE

OCTOBER 2022



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EC register for interest representatives:  
Identification number: 06798511314-27  
BCE identification number: 0415.814.848  
RPM Tribunal de l'entreprise francophone de Bruxelles

Published October 2022

Author: Isabel Paliotta, Associate Policy Officer for Sustainable Food Systems  
[isabel.paliotta@eeb.org](mailto:isabel.paliotta@eeb.org)

European Environmental Bureau (EEB)  
Rue des Deux Eglises 14-16  
1000 Brussels,  
Belgium +32 (0)2 289 1090

Acknowledgments: With thanks to the following colleagues for their input and feedback: Célia Nyssens (EEB), Nick Meynen (EEB), Katharina Wiese (EEB), Ruby Silk (EEB) and Ben Snelson (EEB).



This report was produced with financial support from the European Union's Life Programme, the MAVA Foundation and the European Climate Foundation. Its contents are the sole responsibility of the authors and do not necessarily reflect the views of the donors.

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## THE BIGGER PICTURE

Food security, food safety and access to healthy food in Europe are all attainable, but not under the current food system. The industrialisation, hyper-globalisation and monopolisation that underpin the current system make it a self-defeating structure, driving deforestation, species extinction, health crises, soil depletion and climate breakdown. These characteristics also make for a system that is fragile in the face of global pressures, as demonstrated by the supply chain disruption resulting from Russia's war in Ukraine and Covid-19. If the current food system is left to continue, and inevitably exhaust itself, the dire consequences already being endured by our generation will only get worse. Already, over 13 million people across the EU face moderate to severe food insecurity, with the trend rising since 2015. Most affected are women, children, and marginalised groups.

Such entrenched systems can feel like an unchangeable reality. But we can choose otherwise. We can diversify the food we eat and decentralise the

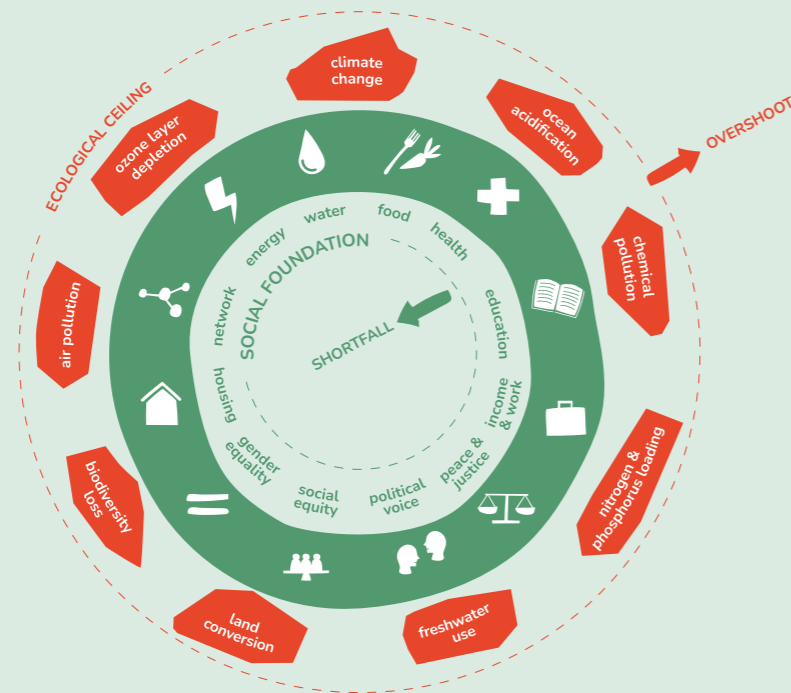


systems of production and consumption to make our food system resilient, secure and safe. This is hardly radical when compared to the current growth-at-all-costs driven system that is wrecking the planet and threatening food security in the long-term for ever more people.

## THE DOUGHNUT ECONOMY

One economic structure that could support such a transformation is that of the 'Doughnut economy'. This concept was developed to represent an economy and production system geared towards keeping human activities safely within planetary boundaries and safeguarding the social foundation for a healthy, safe, dignified and fulfilling life for all. The corresponding circular food system would be based on regenerative practices rather than excessive production and consumption. Such safe operating space is highlighted in green in the image below.

More on this at <https://eeb.org/doughnuteconomicsforall/>



The good news is that Europe is endowed with the resources to be self-sufficient and support a secure, sustainable food system for all. The EU can and must lead a wider food system revolution, and the proposal for a Sustainable Food Systems Law announced in the Farm to Fork strategy and expected for the end of 2023 represents a key opportunity to initiate this.

Such a law has the potential to bring about decent jobs in agriculture, more security of food supply and healthier food, available for all, while helping to curb climate breakdown, soil erosion and species loss. All it needs is a good dose of imagination, courage and responsible governance.

## A SUSTAINABLE FOOD SYSTEM

A sustainable food system should be structured to remain safely within planetary boundaries while safeguarding its social foundation. It should sustainably integrate the environment, social relations and human health.

### THE FOOD SYSTEM SHOULD...

- provide easily accessible sustainable, healthy and nutritious diets to everyone;
- stay safely within planetary boundaries, contributing to the protection and restoration of natural resources and ecosystems, including water, soil health, air quality, biodiversity and landscapes;
- be shaped and managed by representatives of all relevant stakeholders, at all levels of governance;
- provide dignified working conditions and a fair income to all workers employed in it, everywhere (farmers, fishers, processors, retailers, etc.);
- ensure the highest animal welfare standards are met throughout.

## SUSTAINABLE FOOD POLICY

A siloed approach to food policy has created a policy landscape characterised by conflicting objectives and measures, and in some cases actual policy gaps. In these instances, private actors have been left free to pursue their economic interests unchecked, even when they conflicted with the public good.

The narrow focus on boosting production and financial gains has ushered in the predominance of monocultures of fewer and fewer species along with a widespread addiction to synthetic inputs like pesticides, fertilisers and antimicrobials. Such decimation of the genetic diversity of the plants and animals we farm and eat has severely undermined our food system's resilience as well as our nutritional intake.

The impact of our diets on the environment and public health is disastrous and worsening, with about 30% of all anthropogenic GHG emissions coming from the



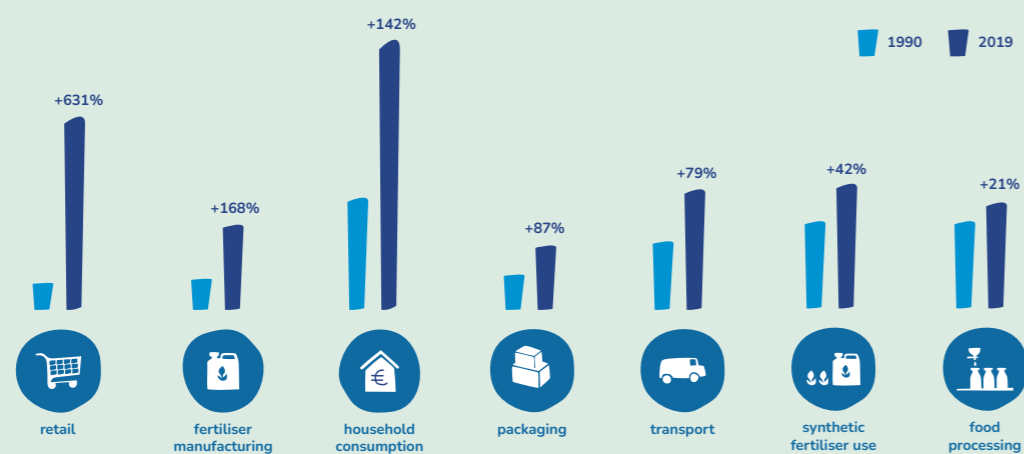
food system, and unhealthy diets being a leading cause of non-communicable diseases (NCDs), which represent around 90% of all premature deaths in the EU.

The current food system has also engendered a gaping power divide, with a diminishing number of increasingly powerful actors pulling the strings of the system and exerting considerable lobbying power. At the other end of the spectrum stand small and medium-sized producers, battered by impossible competition, and citizen-consumers, misinformed and manipulated by businesses for the sake of corporate interests.

The food system is also entirely globalised, relying on lengthy, extractive and exploitative supply chains that are far too easily disrupted to guarantee long-term food security. As well as debilitating biodiversity worldwide and compounding climate change, these dynamics have disrupted local communities, economies and food systems.

Policy at all levels has adapted to and supported the structure of this system, further entrenching it. The measures of success we use to assess the functioning of the food system are correspondingly warped, guided by the narrow and short-sighted focus on economic growth and efficiency. Considering the vital significance of the fundamental rights the food system

INCREASE IN EMISSIONS FROM FOOD SECTOR ACTIVITIES, 1990 – 2019



Source: Tubiello, F. N. et al. (2022). *Pre- and post-production processes along supply chains increasingly dominate GHG emissions from agri-food systems globally and in most countries*, Earth System Science Data, <https://essd.copernicus.org/articles/14/1795/2022/essd-14-1795-2022.pdf>

should be designed to support, we are clearly using the wrong benchmarks.

Such systemic issues can only be dealt with effectively by robust public policies and reformed governance. Placing the onus on citizens, baffled by choice and conflicting information, to make the ‘right’ choice or to private actors with commercial interests to do the ‘right’ thing are not viable options. It is the responsibility of public authorities to work for the public good, and in this remit, the public good is about making the EU food system healthy and sustainable in the long term.

## THE EU SUSTAINABLE FOOD SYSTEMS LAW: A CRITICAL JUNCTURE

The Commission’s commitment to design an integrated EU approach to food through a new framework law for Sustainable Food Systems (SFS Law) comes at a critical time, as 2022 sees record temperatures disrupting food chains and livelihoods across Europe.

The stated objectives of the framework to “promote policy coherence at EU and national level, mainstream sustainability in all food-related policies and strengthen the resilience of food systems” (Farm to Fork strategy, 2020) are crucial for addressing some of the key obstacles to the transition<sup>1</sup>.

However, since its publication, the Farm to Fork strategy has repeatedly come under fire from the powerful actors who have dominated agri-food policymaking for decades and whose interests are threatened by the green transition. In their latest bid to impede progress towards a sustainable food system, these actors have intentionally fed public fears around food security, caused by the invasion of Ukraine, to call for a curtailing of the EU’s environmental ambitions in agriculture and a renewed focus on boosting food production. However, there can be no food security without sustainable and resilient food systems.

An ambitious proposal from the Commission could help rally citizens’ support for the EU by demonstrating its will to stand up to protect people’s health and quality of life. The Union could do so more effectively than individual member states, particularly considering the heavy-



weight corporate interests the system change is up against. At the same time, a bold EU food policy could build on and scale up local food policies, providing a multiplier effect for bottom-up change. It could also support the achievement of sustainability objectives set in other EU policies by aligning with them and bolstering policy coherence. Finally, the EU's international standing as a leading policy innovator and human rights advocate could also benefit from a strong proposal on sustainable food systems, which is critical to achieving key UN Sustainable Development Goals, particularly SDG 2 on "Zero Hunger" and SDG 3 on "Good Health and Well-Being".

Making EU food systems sustainable, fair, resilient and healthy must be a top priority for policy makers, and the SFS Law should be the catalyst of that transition. Agri-food policy in the EU has historically been centred on production, often leading to overproduction. After several food-related public health scandals shook Europe, the EU took strong action to guarantee food safety for EU consumers, resulting in the General Food Law. In a similar way, the SFS Law must now effectively tackle the appalling harm EU food systems cause to the climate and biodiversity, and to our health, by heralding a new, integrated food policy for the European Union.



## A DEFINITION

In order to adequately frame an effective legislative proposal for systemic change in EU food systems, some key founding definitions should be put forward, starting from a workable definition of sustainable food systems.

*"A sustainable food system is one that provides and promotes safe, nutritious and healthy food of low environmental impact for all current and future EU citizens in a manner that itself also protects and restores the natural environment and its ecosystem services, is robust and resilient, economically dynamic, just and fair, and socially acceptable and inclusive. It does so without compromising the availability of nutritious and healthy food for people living outside the EU, nor impairing their natural environment."* (SAPEA, 2020)

## EEB RECOMMENDATIONS FOR THE SFS LAW

### 1. The SFS Law should adopt a systemic and rights-based approach, ensuring policy coherence

To initiate a successful transition to a sustainable food system, the SFS Law must establish a rights-based and systemic approach to food policy.

#### a. Building a rights-based framework for food policy

A rights-based framework entails that the SFS Law should be founded upon the following principles:

- **Action** through the formulation of **policies and strategies** that contribute to achieving fair, healthy and sustainable food systems **is the responsibility of public authorities at all levels.**
- **Equity is a key pillar of policy design and implementation**, therefore the law works consistently to empower the most vulnerable and marginalised people.\*

Indeed, taking a rights-based approach to food policy places the onus of creating an environment in which our fundamental rights can be guaranteed firmly on public authorities. Moreover, human rights are universal by nature and thereby necessarily require that those same public authorities work to enable everyone, especially the most vulnerable and marginalised, to fully express and enjoy the relevant rights.

#### b. Establishing an integrated, coherent and systemic approach to food policy

The SFS Law must first and foremost establish the transition to healthy, fair and sustainable food systems as its overarching objective, with all other objectives fitting within this wider framework. Overarching objectives focussed on individual food products or operations would be insufficient and ill-suited given the Law's systemic ambition.

Setting such a system-wide objective as a guiding common objective would also support improved policy coherence. Indeed, the EC's Group of Chief Scientific Advisors identified the lack of policy coherence as one of the main obstacles to food system sustainability (SAPEA, 2020). The absence of an overarching vision for EU law-making on food obstructs

\* Concrete measures through which institutions at different levels can achieve this include: information sharing, capacity strengthening and accountability mechanisms, support to participation in decision-making arenas, etc.

the achievement of environmental, social and economic sustainability objectives, as competing policies undermine each other.

Fragmented interventions and measures attempting to tackle isolated issues, such as those mainly deployed until now, have not led to substantial progress towards a more sustainable food system. This shift requires systemic integration of environmental priorities into all policy areas.<sup>2</sup>

The SFS Law should therefore take the form of an umbrella law laying down the definitions, guiding principles and overarching objectives for the EU food system, and requiring all existing and new food-related legislation and policies to align with these definitions, principles and objectives.

## CAP AS A DAUGHTER LAW

The heaviest environmental impacts from food products take place before the farm gate. Attempting a shift to sustainability for our food system without tackling the agricultural level would ultimately compromise the credibility of the whole framework. Yet, the CAP has so far been at odds with many of the EU's sustainability objectives and environmental acquis.

Configuring the CAP as a daughter law falling under the remit of the overarching – and binding – principles and objectives outlined in the SFS Law would present an opportunity to open 'fortress CAP' once and for all, allowing the agricultural policy making process to become more inclusive and democratic, and truly aligning the EU's agricultural sector with the overall shift to sustainability. Finally, setting the production-side legislation within the same legislative framework as measures tackling the consumption side would provide for complementary objectives and mechanisms, boosting policy coherence and therefore effectiveness.

## 2. The SFS Law should adopt a consistent food environments approach

To achieve a shift to a sustainable food system, the SFS Law will have to address all aspects of the food system, from production to consumption. Tackling unsustainable and unhealthy consumption patterns systemically will require the adoption of a 'food environments approach', as recognised in the Farm to Fork strategy. Food environments are the "physical, econom-

ic, political and socio-cultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food."<sup>3</sup>

The SFS Law must leave behind the "consumer responsibility" narrative, which puts the onus of change on consumers, ignoring the fact that people's choices are influenced by their environment. Instead, public authorities have the responsibility to facilitate healthy and sustainable choices by creating food environments which make those choices the de-



fault. This can include measures affecting the relative price of food, promotion and marketing policies, regulating food composition and retail environments, and setting minimum criteria for public procurement and labelling. This type of intervention has had proven success in many parts of the world, particularly when interventions on food environments have been integrated so as to simultaneously act on different levels.\*

In light of the stark power imbalances that define food environments, policy makers should pay particular attention to the most powerful actors in the agri-food sector, who have the greatest ability to shape food environments, particularly in the middle of the food supply chain – retailers, wholesalers, manufacturers, advertisers, procurers and food services. By acting on food environments and focussing obligations on the biggest players, public authorities can deliver much fairer and more effective policies, which harness individual diets as powerful levers of change.

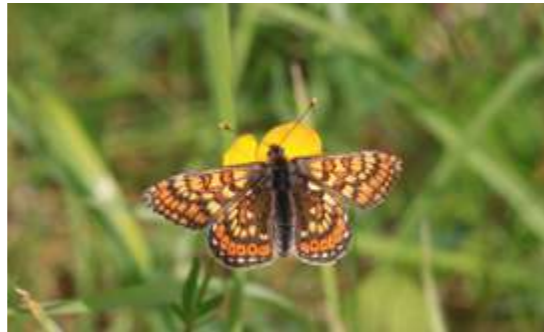
\* Perhaps the most notable best practice worth mentioning here is Chile's progressive National Law of Food Labelling and Advertising (Law 20.606). This regulation was adopted to tackle the country's obesity-related health crisis, and tackles marketing, sets strict parameters for front-of-pack labelling, forbids HFSS foods in school public procurement, and refers to a strict nutrient profiling model which allows it to capture and regulate a wider array of unhealthy food items. The law was adopted in 2016 and has produced remarkable results, including a reduction of about 50% in exposure to HFSS food advertising for children and adolescents and an 85% reduction in child-directed advertising of HFSS foods (Mediano-Stelze et al., 2019). While other Latin American countries have also introduced measures tackling specific aspects of food environments – such as the sugar sweetened beverages (SSBs) tax introduced in Mexico in 2014 – the Chilean example attests the importance of adopting an integrated food environments approach rather than isolated measures (Mozaffarian, 2018; Taillie et al., 2020).

The SFS Law should integrate key measures for which the EU has competencies and require strong action at national and local level to reach common targets.

The SFS Law should therefore:

**a. Establish ambitious minimum mandatory criteria for public procurement**

Public canteens are increasingly referred to as the ‘low-hanging fruit’ in the transition to food system sustainability. If geared towards the achievement of ambitious targets and the Farm to Fork Strategy objectives, public procurement can catalyse food system transformation by harnessing public authorities’ purchasing power and multiplying both health and environmental benefits. The SFS Law should set out minimum mandatory criteria for public procurement going beyond [Green Public Procurement \(GPP\)](#) by considering environmental, health and social aspects. Those criteria should reflect ambitious targets on health, method of production, climate, social sustainability and labour rights, and animal welfare, as detailed in the EU Food Policy Coalition’s *Manifesto for establishing Minimum Standards for Public Canteens across the EU*<sup>4</sup>.



**b. Regulate marketing and promotion practices**

Regulating marketing and promotion practices can be a very effective tool to curtail citizens’ exposure to certain categories of food. However, industry self-regulation has been the most common approach so far, such as in the case of the [EU Pledge](#), despite the fact that “self-regulatory or voluntary schemes are typically narrow in scope, with weak criteria and limited government oversight” (Boyland et al., 2018). The SFS Law should set clear guiding principles for food promotion policy at the EU level, including putting an end to EU subsidies that promote unsustainable food products.

**c. Nudge member states to put in place supportive fiscal policies and to reshape the food retail environment**

Environmental externalities should be systematically internalised in the price of food.<sup>5</sup> Fiscal policy can support the uptake of healthy and sustainable diets by lowering the relative price of certain food groups

through subsidies, particularly to more vulnerable population groups. The possibility of VAT exemptions for healthier food groups, as recently envisioned by the European Parliament, is a good example of such policy. Taxing certain foods to discourage their consumption can have very positive results for public health and the environment, if the tax rate is adequate and this is done alongside supporting policies such as education campaigns and marketing regulation.<sup>6</sup> Increasing the price of certain foods through taxation mostly works when whole food groups – rather than specific nutrients – are targeted. Overall, taxation and subsidy schemes work best when designed to complement each other, with the revenue from the levies being used to fund the subsidies or other related schemes.

Policy designed to shape retail environments can aim either to determine which foods can be sold in outlets – banning certain food groups or setting minimum stocking amounts for others – or how they are displayed and advertised therein, e.g. through banners or special offers. Research and policy trials indicate that the most effective type of intervention is the former, where public authorities directly regulate the food options made available in retail.

Since these measures fall under national competencies, the SFS Law should set clear common objectives and ambitious targets while explicitly referring to retail regulation and economic tools as some of the most effective ways for member states to achieve those targets, as is the case regarding fiscal tools in Article 4 of the EU’s Single-Use Plastics Directive.<sup>7</sup>

**d. Address the power imbalances defining food environments**

Power imbalances in supply chains have been identified as an obstacle to the needed transition and must therefore be tackled as part of efforts to shape enabling food environments (SAPEA, 2020). To achieve a fairer distribution of power, the SFS Law should aim to restructure governance in the food system entirely. Some concrete efforts in this direction could be made by widening the scope of EU competition rules to also cover contractual imbalances between small and medium-sized suppliers and buyers with disproportionate bargaining power, currently only addressed in the EU Directive on Unfair Trading Practices (UTP).

### 3. The SFS Law should set clear, time-bound and legally binding targets

Setting clear targets is crucial to guide policies and steer public and private actors to achieve change. To be effective, targets must be legally binding, backed up by robust accountability mechanisms (see recommendation 5), and SMART (Specific, Measurable, Achievable, Realistic, and Time-bound).

The SFS Law should set clear and binding intermediate and long-term targets for member states and the EU to achieve. This would allow for subsequent daughter laws and national implementing measures to cater for national, regional, and local contexts while still contributing effectively to higher-level common sustainability objectives. Targets set in the SFS Law should build on those set in the Farm to Fork strategy while also increasing their scope and level of detail. They should also contribute to achieving targets set in other relevant legislation. Below, we have listed some of the key targets the SFS Law should set to boost the transition, from a 2020 baseline.

#### Important targets:

- Cut the **environmental footprint of EU food consumption** by at least **30% by 2030, 50% by 2035**, and bring our food system within planetary boundaries by 2040
- Cut **greenhouse gas emissions from the food system by 60% by 2030** and achieve **net-zero emissions in the food system by 2040**
- Cut EU **consumption of animal protein by 30% by 2030 and by 60% by 2040**<sup>8</sup>
- Eradicate **household food insecurity** in the EU **by 2030**, in line with Sustainable Development Goal 2
- Ensure **everyone has access to healthy, nutritious and sustainable diets by 2040**, therefore reducing the impact of diet-related non-communicable diseases (NCDs) and contributing to the eradication of obesity

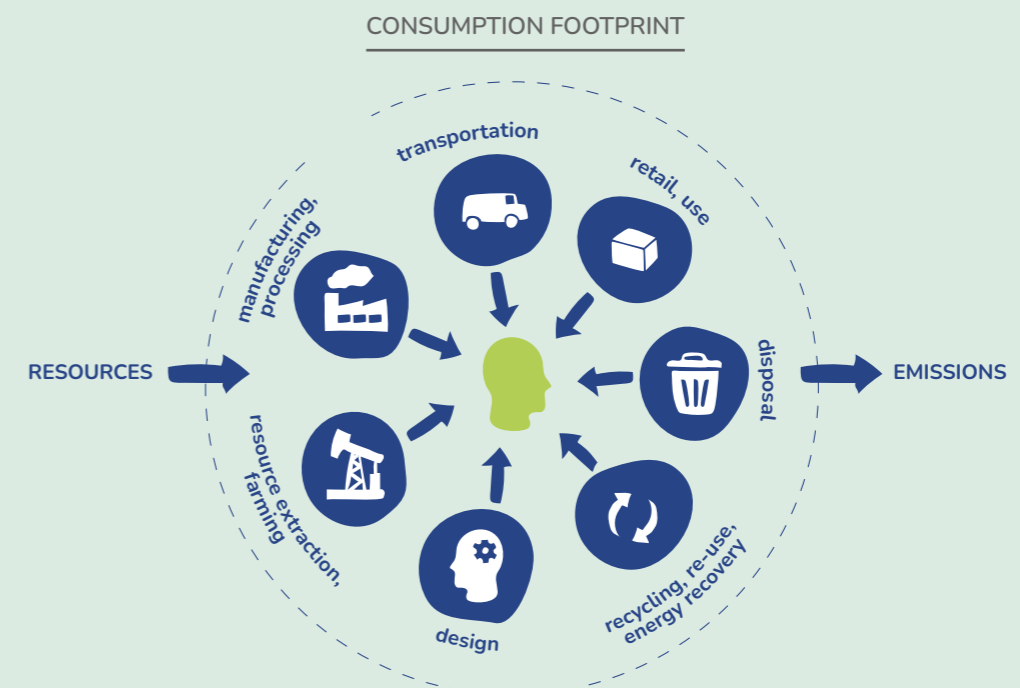
#### In focus:

Below, we have a closer look at the two key targets of reducing our consumption footprint and reducing the consumption of animal protein.

#### a. Reducing our consumption footprint

The Commission's Joint Research Centre has developed an assessment framework to track the development of EU citizens' consumption foot-

prints in different areas, including food, in relation to planetary boundaries.<sup>9</sup>The framework was designed to monitor progress towards the achievement of key EU policy ambitions defined under the [EU Green Deal](#) and the [Circular Economy](#) and [Zero Pollution](#) Action Plans. The framework was designed to monitor progress towards the achievement of key EU policy ambitions defined under the [Environmental Footprint](#) method and assessing products' life stages against 16 environmental impact categories.\*The indicator focusses on country performance and allocates the individual stage impacts to the country in which the product is consumed. The indicator also refers to trade statistics and integrates the impact of imported goods. Based on the aggregate of different product impacts, the overall indicator is then adapted for the EU as a whole. Because of the remit considered, exported goods are not accounted for. Unsustainable consumption patterns across sectors are at the core of devastating environmental degradation in the EU and abroad, but it overall remains a blind spot in EU policy.<sup>10</sup> The consumption of food and drink accounts for a significant portion of the EU's overall consumption footprint (about 20-30%)<sup>11</sup> and, there-



\* The impact categories considered are as follows: climate change, ozone depletion, human toxicity (cancer and non-cancer), particulate matter, ionising radiation, photochemical ozone formation, acidification, eutrophication (terrestrial, freshwater and marine), land use, ecotoxicity freshwater, water use, resource use (fossils, minerals and metals).



fore, requires specific policy attention. The SFS Law should set a binding reduction target for the EU's food consumption footprint, as well as setting the corresponding accountability mechanisms and framework for action. Member states should then be required to outline national pathways of action to reduce national consumption footprints in their National Sustainable Food Plans (see Section 4).

#### b. Reducing the consumption of animal protein

The production, processing and consumption of animal protein accounts for 70-80% of the environmental impact of our food system.<sup>12</sup> According to the EU Court of Auditors, meat is causing 53% of all food-related greenhouse gas emissions in the EU.<sup>13</sup> Since the early 1960s, per capita consumption of meat and fish has doubled (IPES-Food, 2022), with devastating effects on the environment and on our health. The production of animal protein also depends upon a disproportionate consumption of resources. Achieving a sustainable food system will necessarily entail a reduction of the amount of animal products we consume, particularly those from intensive and industrial farming.

### 4. The SFS Law should envisage National Sustainable Food Plans to engage all levels of governance and maximise effectiveness

Achieving the objectives set by the SFS Law will require strong implementation and coordination measures. These will have to be developed across policy sectors and at all relevant levels of governance to ensure coherence between the EU and national levels in the transition. The SFS Law should set a legal framework for National Sustainable Food Plans through which national and local authorities should set out how they will deliver on the objectives of the SFS Law. It should also include provisions to support and encourage equitable access to policy making for all relevant stakeholders (Lang et al., 2009).

As is the case under the Climate Governance Regulation, member states should be required to elaborate five-year National Sustainable Food Plans set within long-term national strategies to be reviewed every ten years. Member states would have to adopt the Plans within one year of the entry into force of the SFS Law, and these should all share common compulsory elements, to be defined in the SFS Law – e.g. public procurement, fiscal

policy, dietary guidelines – which would help ensure a coherent EU-wide approach, as well as a level playing field. Plans would cover a set period of time, e.g. five years, to allow for effective prioritisation of action, consideration of best practices and lessons learned, adaptation to overarching objectives through intermediate targets best suited to regional and local specificities. Furthermore, National Sustainable Food Plans should build on existing national and local policies and deploy measures at the local and regional level. Member states would set more specific targets adapted to national contexts but contributing to the overarching high-level targets set by the SFS Law.

The plans should open food policy processes up to all relevant stakeholders at the regional and local level, therefore supporting the establishment of participatory and inclusive governance systems managing food policy-making.<sup>14</sup>

The monitoring, reporting and evaluation mechanisms for National Food Action Plans should be established in the SFS Law. EU co-funding for member states facing particular challenges should be made available and additional competitive funding lines could also be made available to encourage increased ambition from member states. Indeed, while National Sustainable Food Plans should not be backed up by large-scale EU funding, EU support in these cases could promote cohesion and bolster implementation.

### 5. The SFS Law should lay out a strong accountability and performance framework to monitor progress

Putting in place a strong accountability and performance framework will be key not only for National Sustainable Food Plans, but for the SFS Law as a whole. A comprehensive set of indicators within a wider evaluation mechanism will be vital to monitor progress and boost the timely achievement of targets. The lack of appropriate monitoring mechanisms making financial support strictly conditional to the achievement of intermediate targets and the fulfilment of a strong set of implementation requirements has repeatedly hindered policy implementation in the EU (Lang et al., 2009). Setting out clear intermediate targets and evaluation frameworks can also support implementation from the bottom-up, as it provides useful tools and points of reference to stakeholders taking part in governance mechanisms.



To build an effective monitoring framework, the SFS Law should provide for:

- A set of food indicators on environmental, social and economic aspects for member states to report on annually
- Reports by member states to be developed every two years
- Review and update of National Sustainable Food Plans every five years
- Conferral to the European Environmental Agency (EEA) of the powers to scrutinise the implementation process, monitor progress and advise the EC and member states on policy development
- An annual State of the Food System Report on progress in the transition to be drawn up by the EEA

## CONCLUSIONS

The SFS Law is an exceptional opportunity for the European Union to establish an integrated approach to EU food policy and initiate a food system-wide transition to sustainability. To achieve the ambitious objectives listed for the SFS Law in the Farm to Fork strategy, the Commission will have to set out a bold and wide-ranging proposal for systemic change. Circularity, governance reform and a food environment approach should be the principles guiding the vision for a sustainable food system.

Policy makers will have to display a strong political will to effectively initiate a transition to sustainable food systems in the EU. The SFS Law can introduce an integrated approach to food systems, but it will have to include ambitious actions tied to time-bound targets and supported by clear monitoring mechanisms.

To achieve this momentous shift, we recommend five priorities for the SFS law:

- Adoption of a **systemic and rights-based approach**, ensuring **policy coherence**
- Adoption of a consistent **food environments approach**
- Setting of clear, time-bound and **legally binding targets**
- Engagement of **all levels of governance** to maximise effectiveness and democratic ownership of the transition
- Establishment of a strong **accountability and performance framework** to monitor progress

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European  
Environmental  
Bureau

European Environmental Bureau

Rue des deux Eglises 14-16  
1000 Brussels, Belgium

Tel +32 2 289 1090

[eeb@eeb.org](mailto:eeb@eeb.org)

<https://eeb.org>



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