

The Consumer Voice in Europe

SUSTAINABLE FOOD MADE EASY

The consumer perspective on the EU Sustainable Food System Framework initiative



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Why it matters to consumers

Today's EU food system is unsustainable. It both suffers from and drives climate change, pollution and waste, loss of biodiversity, and diet-related non-communicable diseases – among others.

Most European consumers are open to eat more sustainably yet face barriers. They expect stronger action from both their national government and the European Union to promote sustainable food production and consumption.

The announced Framework Law for a Sustainable EU Food System is a unique opportunity to be a game changer and meet consumers' expectations for healthier, fairer and greener food and farming.

Summary

In its 'Farm to Fork' Strategy, the European Commission has announced a new EU legislative Framework for a Sustainable Food System (FSFS) for the end of 2023. BEUC looks forward to this major initiative, which has the potential to foster the transition to a healthy, fair and environmentally friendly EU food system.

Concretely, we expect a high-level umbrella law which sets the direction of travel and establishes some key definitions (e.g., 'healthy diet'), principles (such as 'Polluter Pays', 'One Health'), and objectives, as well as some time-bound targets. For the sake of policy coherence, existing and future EU laws linked to food should be aligned with the FSFS – notably the EU trade policy.

The FSFS must aim at making sustainable healthy diets the easy choice for consumers. To this end, it must embrace the concept of 'food environments' and lay the foundations for making healthy and sustainable food the most available, affordable, promoted and advertised option. The FSFS must also facilitate informed choices by consumers. This must be done through ensuring that information about any of the dimensions of food sustainability (nutritional, environmental, etc.) is meaningful and trustworthy.

Finally, the FSFS should be the overarching structure guiding and coordinating action across policy areas and governance levels to achieve a sustainable food system for the EU. It should drive Member States action to complement EU-level policies. It also needs to pave the ground for new minimum sustainability requirements applying to economic operators and their activities.

The FSFS can be a game-changer. We urge the European Commission to come forward with an ambitious proposal that meets the expectations of EU citizens, who have overwhelmingly supported a more sustainable EU food system in the open public consultation on the FSFS.

Table of Contents

1. Introduction	3
2. Setting the direction of travel.....	3
2.1. Scope of the FSFS.....	3
2.2. Policy coherence across the board	4
2.3. Key definitions and principles	4
2.4. Time-bound targets.....	7
3. Consumers and the food system transformation	7
3.1. Sustainable healthy diets: a win-win for health, climate and food security	7
3.2. Consumers struggle to meet sustainable and healthy eating goals	8
4. A paradigm shift: making the sustainable choice easy as apple pie	9
4.1. Food prices that send the right signal	9
4.1.1. About the cost of healthy and sustainable diets	9
4.1.2. Moving towards 'true pricing' of food	10
4.1.3. A just transition leaving no one behind.....	11
4.1.4. The role of competition policy	12
4.2. Promoting foods which contribute to sustainable healthy diets.....	12
4.2.1. Marketing unhealthy food to children must stop	12
4.2.2. Getting EU promotion policy right.....	13
4.2.3. Price and location promotions on unhealthy food must be restricted	14
4.3. Making food products healthier and more sustainable by design	14
4.4. Clear labelling for better informed choices	15
5. Fostering action at all levels from farm to fork.....	16
5.1. Member States	17
5.2. Food chain economic actors.....	17
5.3. Consumers and consumer organisations.....	18
6. Conclusion	19

1. Introduction

It is widely recognised that our food system is unsustainable on many counts. Today, the way we produce and consume food in Europe is a major driver of climate change,¹ environmental degradation, and biodiversity loss. Obesity is still rising. Antimicrobial resistance linked to the inappropriate use of antimicrobials in animals and humans kills an estimated 33,000 people every year. In short, our food system takes a heavy toll on Europeans' health and places a significant burden on healthcare systems.² It is unequitable, with 88 million tons of food being wasted annually while over 8.6% of the European population cannot afford a proper meal every second day^{3,4}. Food poverty is expected to increase even further because of the food inflation and the cost-of-living crisis hitting European households. The EU food system also has severe environmental and social impacts abroad, with EU consumption driving deforestation (e.g. for soy and palm oil) and overfishing.

To address this stark reality, in May 2020, the European Commission published the 'Farm to Fork' Strategy for a fair, healthy and environmentally friendly food system.⁵ The EU's sustainable food blueprint sets out a promising direction of travel but has no binding effect. Importantly, its concrete implementation is yet to be supported by a series of legislative initiatives. Among these, a new EU legislative Framework for a Sustainable Food System (FSFS) has been announced for the end of 2023.

As the European Commission is currently conducting the impact assessment of the FSFS initiative, BEUC, the European Consumer Organisation, shares the following considerations and recommendations for an ambitious FSFS from a consumer perspective.

2. Setting the direction of travel

2.1. Scope of the FSFS

The European Environment Agency⁶ recognised that "societal systems of production and consumption (food, energy and mobility) must be transformed to achieve Europe's sustainable, low-carbon future". The upcoming EU legislative Framework for a Sustainable Food System (FSFS), therefore, should have a **broad scope capturing the entire food system**. It should span from the farm (incl. agricultural inputs) to the fork (incl. retail, food service and catering) through primary production, processing, etc. – and any relevant sectors. Whereas existing EU legislation and policies mainly target primary producers and consumers, the 'middle of the food chain' (incl. food processors, retailers, the food service sector) warrants prominent focus in the FSFS owing to its strong influence on what is being produced and consumed.⁷

¹ Agriculture is responsible for 10.3% of the EU's GHG emissions and nearly 70% of those come from the animal sector.

² Disease-related malnutrition is estimated to cost the EU €120 billion annually according to the SAPEA Evidence Review Report: [A Sustainable Food System for the European Union](#).

³ https://ec.europa.eu/food/safety/food-waste_en (data from 2020)

⁴ <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20220225-1>

⁵ European Commission, 'Farm to Fork' Strategy for a fair, healthy and environmentally friendly food system, 20 May 2020.

⁶ *The European environment — state and outlook 2020*, 2019.

⁷ European Commission, Directorate-General for Research and Innovation, Group of Chief Scientific Advisors, *Towards a sustainable food system: moving from food as a commodity to food as more of a common good: independent expert report*, Publications Office, 2020, <https://data.europa.eu/doi/10.2777/282386>.

2.2. Policy coherence across the board

The FSFS should be a **high-level umbrella law** which will mainstream sustainability across existing and future EU policies related to food. It should require that existing EU legislation be evaluated for its **coherence with a sustainable food system** and – as needed – reviewed to phase out any inconsistencies. The evaluation should be comprehensive and cover policies for which a review is already foreseen under the Farm to Fork Strategy. Indeed, in the absence of common definitions and principles for ‘sustainable food systems’, ‘healthy diets’, etc. to be set out in the FSFS, on-going policy reviews (e.g., as regards the EU promotion policy for agricultural products) may fall short of a full alignment with sustainability objectives.

The FSFS should include some general trade obligations to ensure **strong coherence and alignment between EU policies on sustainable food production and consumption and on trade**. This will avoid externalisation of unsustainable practices. It will also meet the expectations of EU citizens, of whom 93% agree, for instance, that imported products from outside the EU should respect the same animal welfare standards as those applied in the EU.⁸ Concretely, the FSFS could require that EU legislation should be evaluated and where needed, revised to include ‘mirror clauses’ ensuring that relevant provisions also apply to food imports (as is already the case for some EU rules pertaining to the use of antimicrobials in farmed animals). The Commission’s report published in June 2022 confirmed that, under certain conditions and provided this is done in compliance with World Trade Organisation (WTO)’s rules, EU health, environmental and animal welfare standards on production methods may be applied to imported products.⁹

The FSFS should include a reference to **competition policy** considering the latter’s role in the transition towards more sustainable agricultural practices and food supply chains.

Lastly, sectoral policies such as the **Common Agricultural Policy (CAP) and the Common Fisheries Policies (CFP) should also be brought into coherence** with the FSFS when they are next reviewed. Given the significant share of the CAP in the EU budget, a ‘public money for public good’ principle should apply, and the next CAP reform should end all forms of agricultural subsidies which run counter to the FSFS objectives.

BEUC recommendation

By 2030 at the latest, the Commission should evaluate and **review all existing horizontal and sectoral policies** linked to food and food systems to ensure that they are **consistent with and support the objectives and targets of the FSFS**.

2.3. Key definitions and principles

To set a clear direction of travel for all actors involved, the FSFS needs to establish some **common definitions**, including:

Healthy diets: according to the World Health Organization (WHO)¹⁰, a healthy diet “helps to protect against malnutrition in all its forms, as well as noncommunicable diseases (NCDs), including such as diabetes, heart disease, stroke and cancer”.

⁸ European Commission, Directorate-General for Health and Food Safety, *Attitudes of Europeans towards animal welfare: report*, European Commission, 2016.

⁹ Report from the European Commission to the European Parliament and the Council. [Application of EU health and environmental standards to imported agricultural and agri-food products](#). COM(2022) 226. June 2022.

¹⁰ What constitutes a healthy diet has been defined in WHO’s Fact Sheet 394 (see also Box 1).

Sustainable healthy diets: according to the Food & Agriculture Organisation (FAO) and WHO, sustainable healthy diets “have low environmental pressure and impact, are accessible, affordable, safe and equitable and are culturally acceptable”. They “achieve optimal growth and development of all individuals and support functioning and physical, mental, and social wellbeing at all life stages for present and future generations”, while “support[ing] the preservation of biodiversity and planetary health. Sustainable healthy diets must combine all the dimensions of sustainability to avoid unintended consequences”.¹¹

Box 1 – A healthy diet: implications for current EU consumption patterns?

What does the WHO recommend?

- **Fruit and vegetables:** At least 400 grams per day as cornerstone of a healthy diet.
- **Fats:** Saturated fats should represent less than 10 % of total energy intake, with a shift in fat consumption away from saturated fats and trans-fats to unsaturated fats, and towards the elimination of industrial trans fats.
- **Free sugars:** Less than 10% of total energy intake. A further reduction to less than 5% of total energy intake would bring additional health benefits.
- **Salt:** Keeping salt intake to less than 5 g per day helps prevent hypertension and reduces the risk of heart disease and stroke in the adult population.

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

Food and nutrition security: food security is more than just about supply and freedom from hunger. It is also not to be confused with food independence. The Committee on World Food Security has defined “food and nutrition security” as when “all people at all times have physical, social and economic access to food, which is safe and consumed in sufficient quantity and quality to meet their dietary needs and food preferences, and is supported by an environment of adequate sanitation, health services and care, allowing for a healthy and active life”.¹² As for the role of the EU in ensuring global food security, it is often overstated: in reality, the EU imports low-value raw products, such as cocoa, fruits and animal feed for its livestock sector, while it mostly exports high-value products such as wine, spirits and chocolate – making little to contribute to world food security.¹³

Sustainable food system: defining a ‘sustainable food system’ for the EU, albeit important, might prove challenging due to contrasting visions thereof, with the risk of ending up with a vague, poorly operational definition. The SAPEA report (2020) offers a good starting point for such definition.¹⁴ As a complement, the FSFS should establish a set of clear objectives and criteria spanning all dimensions of sustainability¹⁵ and require that these criteria be reflected in relevant existing and future legislation.

¹¹ FAO and WHO. 2019. [Sustainable healthy diets – Guiding principles](#). Rome.

¹² <https://www.fao.org/3/md776e/md776e.pdf>

¹³ WWF European Policy Office. *Europe Eats the World* (2022).

¹⁴ A sustainable food system for the EU 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.” In: SAPEA, Science Advice for Policy by European Academies. (2020). *A sustainable food system for the European Union*. Berlin: SAPEA. <https://doi.org/10.26356/sustainablefood>

¹⁵ Health, ecological, economic, social, ethical and resilience. See policy brief on [Food Environments & EU Food Policy. Discovering the role of food environments for sustainable food systems](#) (2021) produced in the framework of the EU Food Policy Coalition.

The FSFS also needs to establish some **key principles and concepts**:

'One Health': this principle recognises that the health of humans, domestic and wild animals, plants, and the wider environment (including ecosystems) are closely linked and inter-dependent. The FSFS must promote a One Health approach in the transformation of the food system. It also needs to create the conditions for more systematic and strengthened collaboration between EU agencies responsible for risk assessment such as the European Food Safety Authorities (EFSA), the European Chemicals Agency (ECHA), the European Centre for Disease Prevention and Control (ECDC), the European Environment Agency (EEA) and the European Medicines Agency (EMA).

'Do No Harm': In the EU Green Deal, the Commission pledged to ensure that all other non-Green Deal initiatives live up to a green oath to 'Do No Harm'. To foster policy coherence, the FSFS must require that any EU (and national) policy initiative affecting food should undergo a 'Do No Harm' test against the set of sustainability criteria mentioned above (and which may need to be tailored to different sectors via secondary acts). The 'Do No Harm' test should also apply to businesses in relation to their operations and the products they place on the EU market.

'Polluter Pays', 'Provider Gets': A report by the EU Court of Auditors found that 'Polluter Pays' is reflected and applied to varying degrees in the different EU environmental policies, and its coverage and application is incomplete (e.g. the agricultural sector is often not charged for wastewater treatment).¹⁶ Another Court of Auditors' report looking into the effectiveness of CAP climate spending in reducing GHG emissions from agriculture concluded that the EU does not apply a 'Polluter-Pays' principle for agricultural emissions.¹⁷ It recommended that the Commission should assess the potential to apply the 'polluter pays' principle to emissions from agricultural activities, and reward farmers for long-term carbon removals.

A study carried out for the European Parliament's AGRI Committee also underlined the need to more effectively apply the 'polluter-pays principle' in the provision of CAP payments via stricter conditionality rules.¹⁸ The application of the 'Polluter Pays' principle to the agricultural sector would foster more sustainable practices at the production level. In parallel, the explicit formulation of a 'Provider Gets' principle (in line with the concept behind the CAP 'eco-schemes' and a 'Public Money for Public Good' approach), would serve to recognise that producers who go beyond EU minimum legal requirements and deliver additional environmental benefits should be compensated for that. A BEUC survey on EU consumers' attitudes towards sustainable food found that 53% agree that farmers should be given incentives (e.g. through subsidies) to produce food more sustainably.¹⁹

Applying 'Polluter Pays'/'Provider Gets' on the supply side would also have an impact on the consumption/demand side, as it would mean moving towards **'true cost' accounting for food** (with prices better reflecting externalities such as pollution costs). This would also be in line with the Farm to Fork Strategy's stated ambition to make the sustainable choice the most affordable one.

¹⁶ https://www.eca.europa.eu/Lists/ECADocuments/SR21_12/SR_polluter_pays_principle_EN.pdf

¹⁷ https://www.eca.europa.eu/Lists/ECADocuments/SR21_16/SR_CAP-and-Climate_EN.pdf

¹⁸ INRAE and AgroParisTech (2020). *The Green Deal and the CAP: policy implications to adapt farming practices and to preserve the EU's natural resources*.

¹⁹ BEUC, *One bite at a time: consumers and the transition to sustainable food*, An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

BEUC recommendation

The FSFS must promote the **full application of the 'Polluter Pays' and 'Provider Gets' principles to the agricultural sector**. This is part of a fair and socially just transition to a sustainable food system.

'Food Environments': The concept of 'food environment' has been defined as the "physical, economic, political and sociocultural context in which consumers engage with the food system to make their decisions about acquiring, preparing and consuming food."²⁰ Contrary to the dominant narrative which tends to blame consumers for making the 'wrong' food choices, a food environment approach recognises that individual food choices are also "constrained by norms and conventions, cost, convenience, and habit, and the ways in which food choice is presented".²¹ The FSFS must **fully endorse the concept of 'food environment' and set out a clear vision** for "a favourable food environment that makes it easier to choose healthy and sustainable diets" as mentioned in the Farm to Fork Strategy.²²

2.4. Time-bound targets

To foster planning, monitoring and, ultimately, delivery on the FSFS objectives, the law should establish a few time-bound targets focused on priority policy objectives. These targets should include those already set in the Farm to Fork and Biodiversity strategies – yet only aspirational until translated into legally binding ones.

Other targets should be considered, on both the supply (e.g. GHG emissions reduction goals for various stages of the food supply chain) and demand/consumption sides (e.g. reducing obesity levels by x% by 2035, reaching x% of the population in each EU country adhering to dietary guidelines for healthy and sustainable eating by 2030-35, etc.).

3. Consumers and the food system transformation

3.1. Sustainable healthy diets: a win-win for health, climate and food security

Demand-side changes are part and parcel of the food system transformation. Unhealthy diets are a leading risk factor for a range of noncommunicable diseases, including heart attacks and stroke, cancer, diabetes and other conditions linked to obesity. With 1 in 2 European adults and 1 in 3 children overweight or obese, the WHO's Europe office has warned that obesity is on track to overtake smoking as the main risk for preventable cancer in Europe.²³ The promotion of a "more plant-based diet with less red and processed meat [...] and more fruit and vegetables" also features prominently in the European Commission's 'Europe Beating Cancer Plan'.²⁴

²⁰ HLPE. 2017. Nutrition and food systems. *A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security*, Rome.

²¹ European Commission, Directorate-General for Research and Innovation, Group of Chief Scientific Advisors, *Towards a sustainable food system: moving from food as a commodity to food as more of a common good: independent expert report*, Publications Office, 2020, <https://data.europa.eu/doi/10.2777/282386>.

²² The role of food environments in a sustainable food system is comprehensively addressed in this document: Policy briefing. Food Environments & EU Food Policy. *Discovering the role of food environments for sustainable food systems* (2021). EU Food Policy Coalition.

²³ <https://www.who.int/europe/news/item/03-05-2022-new-who-report--europe-can-reverse-its-obesity--epidemic>

²⁴ https://ec.europa.eu/health/system/files/2022-02/eu_cancer-plan_en_0.pdf

On the climate front, the latest IPCC Working Group III report highlighted dietary shifts (as part of behaviour and lifestyle changes) as low-hanging fruits having great potential to swiftly bring GHG emissions from food systems down.²⁵ Similarly, in the context of the war in Ukraine and its impact on agri-food markets, over 660 scientists have called for accelerating the shift towards healthier diets with less animal products in Europe, as it would lead to a more sustainable and resilient food system while contributing to global food security.²⁶

Eventually, dietary changes in Europe are also key to ensure that the Farm to Fork Strategy will not have unintended consequences for food systems in other parts of the world (e.g. Africa), adding to rising food prices.^{27,28}

3.2. Consumers struggle to meet sustainable and healthy eating goals

Consumer interests and expectations in relation to food have evolved over time. Today, most of them say they pay some (47%) to a lot (17.3%) of attention to the environmental impact of their food choices, a BEUC survey found. Two-third of consumers are open to changing their food habits for environmental reasons.²⁹

But in practice, many consumers struggle to turn their sustainable eating goals into action. Aspects such as taste and cost continue to be prioritised in the purchase situation, according to a pan-European poll.³⁰ In Denmark, BEUC member Forbrugerrådet Tænk's latest consumer barometer on food and sustainability found that traditional factors including taste, quality, freshness, and price remain the main drivers of consumer food choices, before climate considerations.³¹ The BEUC survey identified price, lack of knowledge, the challenge of identifying sustainable food options as well as their limited availability as the main perceived barriers to sustainable eating.²⁹

The Danish survey also showed that consumers see food sustainability first and foremost as a challenge for the whole of society to take care of, echoing previous findings whereby EU citizens consider that they themselves only have a secondary role in making our food systems sustainable or might place a greater reliance on other actors to do so.³⁰ Most consumers **put the onus on food producers and manufacturers** to make the food system sustainable.³⁰ They also **expect governments to take leadership** in promoting sustainable food production and consumption.²⁹

Only 19% of Europeans have changed their diets to incorporate more sustainable food, according to an EU-wide poll.³² The BEUC survey found that an average of 1 in 3 consumers are willing to cut down on red meat consumption – while close to 1 in 2 are willing to eat more vegetables/plant-based foods. Cutting down on dairy appears to be more of a challenge for consumers, with only 1 in 5 willing to reduce consumption.²⁹

²⁵ <https://www.ipcc.ch/report/ar6/wg3/>

²⁶ <https://www.pik-potsdam.de/en/news/latest-news/food-crisis-due-to-ukraine-war-calls-for-action-less-meat-less-waste-and-greening-eu-agricultural-policy>

²⁷ <https://ecdpm.org/talking-points/russias-invasion-leaves-north-africa-with-food-crisis-what-can-europe-do/>

²⁸ The shift to environmentally friendly farming practices may result in lower agricultural yields – albeit [not to the extent](#) predicted by some too narrowly-focused 'impact studies'. But the fact is that scenario modelling an agroecological or organic Europe by 2050 all factor in dietary shifts with less animal source foods (e.g. [IDDRI](#), [CNRS](#)).

²⁹ BEUC, [One bite at a time: consumers and the transition to sustainable food](#), An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

³⁰ European Commission, Directorate-General for Health and Food Safety, *Making our food fit for the future – Citizens' expectations: report*, European Commission, 2020.

³¹ Forbrugerrådet Tænk's Consumer Barometer on food and sustainability. May 2022. <https://taenk.dk/presse/klimahensyn-vokser-i-vores-valg-af-foedevarer>

³² European Commission, Directorate-General for Environment, *Attitudes of European citizens towards the environment: report*, European Commission, 2020.

Recent large-scale international research on attitudes towards climate policies brings interesting insights on factors influencing people's willingness to adopt climate-friendly behaviours (incl. change what they eat).³³ In this study, individuals were generally unwilling to limit their beef or meat consumption significantly. However, willingness to cut down on meat would increase significantly if respondents were told that others, especially the most well-off, would also change their behaviour.

4. A paradigm shift: making the sustainable choice easy as apple pie

While consumers struggle to turn intentions into food purchasing decisions, blaming them for their choices is counterproductive and unfair, as it disregards the fact that factors such as income, education, time, social norms and habits, location, etc. influence and constrain individuals' food choices.

The role of 'food environments' in influencing consumption choices is now widely recognised. According to the latest WHO EURO Obesity Report, "policies and regulations in most high- and middle-income countries have led to food environments that are overwhelmed by highly accessible, relatively cheap and heavily promoted unhealthy foods that typically contain high levels of sodium, saturated fat and/or added sugar. These unhealthy food environments result from changes in the global food supply (for instance, in the European context, heavy subsidies, both national and EU-funded, on the production of meat, dairy and sugar make them relatively cheaper and more available population-wide); they are now the major drivers of unhealthy diets, obesity and related non-communicable diseases".³⁴

BEUC recommendation

The FSFS **must foster enabling food environments**, where foods that contribute to sustainable healthy diets are the most available, accessible, affordable, attractive and widely promoted.

4.1. Food prices that send the right signal

4.1.1. About the cost of healthy and sustainable diets

Consumers commonly think that eating healthily and/or sustainably is more expensive than not. Evidence on whether this is the case is mixed, however (see Box 2) – and likely depends on the starting point.

While a healthy and sustainable diet may not necessarily cost more than the *average* diet in a country, it is not affordable to all either. **Access to safe and nutritious food remains a problem for parts of the EU population**, and food poverty is a concern for 8.6% of people in the EU who are unable to afford a quality meal every second day.³⁵ The current food price inflation driven by the recovery of global demand post-COVID, skyrocketing energy prices and increased transport, feed, and fertiliser costs, and exacerbated by the Russian invasion of Ukraine, is only worsening the situation.

³³ Dechezleprêtre, A., et al. (2022), "Fighting climate change: International attitudes toward climate policies", OECD Economics Department Working Papers, No. 1714, OECD Publishing, Paris, <https://doi.org/10.1787/3406f29a-en>.

³⁴ WHO European Regional Obesity Report 2022. Copenhagen: WHO Regional Office for Europe; 2022.

³⁵ See Eurostat, 2020.

Box 2 - Eating a healthy and sustainable diet: does it always have to cost more?

In Belgium, [a study](#) looking into the average prices of over 2,000 food items found that the cost of diets of Belgian consumers meeting healthy eating guidelines was greater than that of those not meeting these guidelines. Likewise, in the UK, [it is estimated](#) that the 20% of households with the lowest levels of disposable income would have to spend 39% of their disposable income to eat a healthy diet, as defined by the UK Government's recommended Eatwell Guide.

In Switzerland, [consumer group Fédération romande des consommateurs \(FRC\)](#) found that shifting to a diet that is both in line with nutrition recommendations and more sustainable (incl. less animal proteins, less food waste, and tap instead of bottled water) would save consumers money compared to the cost of the average Swiss diet. This was true even when consumers would also shift to buying more organic products.

In France, the Agency for Ecological Transition (ADEME) [published a leaflet](#) showing consumers that eating more sustainably does not have to cost more provided one also changes their food habits. For the same price as the standard food shopping basket, consumers could lower their food-related CO₂ footprint and buy more organic and sustainably sourced products if they would also cut down on fish, meat, sugary drinks and processed products, buy more fruit and vegetables, legumes and wholegrains, and waste less food.

4.1.2. Moving towards 'true pricing' of food

Today, **consumers who wish to eat more sustainably often pay a higher price for the greener and healthier option.** Indeed, price signals poorly reflect environmental and social (including health-related) costs associated with food production and consumption. The Farm to Fork Strategy ambitions – and rightly so – for the most sustainable food to also become the most affordable one yet says little on how to achieve that goal concretely.

EU citizens are in fact paying more for their food than the price tag they see in the shop – but without even realising it. They pay for their food in many ways: at the checkout, but also through healthcare costs,³⁶ agricultural subsidies,³⁷ and water charges for instance (incl. costs for dealing with drinking water pollution from pesticides and excess livestock manure and mineral fertilisers).

Research found significant gaps between the price paid by German consumers in the shop and the 'true costs' of various food items.³⁸ Yet, **81% of Europeans agree that food prices should reflect the costs for society** (i.e. including environmental and health impacts associated with food consumption).³⁹

³⁶ Half of the EU adult population is overweight or obese (Eurostat, 2021), while overweight and obesity are risk factors for many non-communicable diseases.

³⁷ The Common Agricultural Policy accounts for roughly a third of the EU's budget 2021-2027.

³⁸ Michalke, A., Gaugler, T. (2020). [How much is the dish? True Cost Accounting von Umweltfolgekosten und „wahre Preisschilder“ in Deutschland](#). Were the impacts (and associated costs) of nitrogen, greenhouse gases, energy, and land-use change 'internalised', it was estimated that German consumers would pay up to 8% more for conventional tomatoes (4% for organic tomatoes), 122% more for conventional milk (69% for organic milk), and 173% more for conventional meat (126% more for organic meat).

³⁹ Special Eurobarometer 505. Making our food fit for the future – Citizens' expectations. October 2020.

Fiscal measures are increasingly touted to ‘nudge’ consumers towards better choices by altering the relative prices of sustainable vs. unsustainable food options.⁴⁰ Whereas price incentives are supported by consumers, taxing food that is less sustainable is – expectedly – less popular. Only 1 in 4 consumers would support taxes on less sustainable products.⁴¹ Taxes are also less likely to be accepted if people feel they are paying the full price for environmental/climate protection, while food producers escape their responsibilities. Notably, there is growing concern that agricultural subsidies are not sufficiently targeted at incentivising sustainable practices. **A repurposing of farm subsidies can incentivise sustainable practices while lowering the relative price of sustainable food.**

The latest *State of Food Security and Nutrition* report by the United Nations found that agricultural subsidies often target the production of staple foods, dairy and other animal source foods, while fruits and vegetables are relatively less supported. If governments repurposed the resources they are using to incentivise the production, supply and consumption of nutritious foods, they would contribute to making healthy diets less costly, more affordable and equitable for all.⁴²

4.1.3. A just transition leaving no one behind

The transformation of the food system will incur costs (albeit much lower than continuing with the current system), some of which will have to be covered by the markets. Measures to reduce food waste combined with the promotion of dietary readjustments can help mitigate some of these costs at consumer level,⁴³ yet **social compensation will be vital to cushion the impact on lower-income households and support access to sustainable healthy diets for all.**

Leaving no one behind equally applies to farmers, many of whom – especially smallholder family farmers – struggle to make a decent living. There is often a big gap between the price paid by consumers at the supermarket and the price which farmers receive for their produce. **Achieving fair prices for farmers requires increased transparency on margins for processors and retailers.**

Consumers should know how much from the price they pay goes to farmers versus other food chain actors – even more so in the current economic context of rising food prices. An investigation carried out by the Fédération romande des consommateurs (FRC) on the Swiss market (with a focus on dairy products) found that retailers’ margins account for 30-40% of the price paid by consumers.⁴⁴ Member States should be encouraged to set up observatories of price formation and margins in the food sector⁴⁵ and use competition law to tackle abuses by powerful market players.

⁴⁰ The Scientific Advice Mechanism (SAM) report [Towards a Sustainable Food System](#) found that “evidence is clear that binding (‘coercive’) policy measures, such as regulation and fiscal measures, tend to be the most effective in achieving change towards food sustainability”.

⁴¹ BEUC, [One bite at a time: consumers and the transition to sustainable food](#), An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

⁴² <https://www.who.int/news/item/06-07-2022-un-report--global-hunger-numbers-rose-to-as-many-as-828-million-in-2021>

⁴³ Guyomard et al. Research for the AGRI Committee – The Green Deal and the CAP: policy implications to adapt farming practices and to preserve the EU’s natural resources. Nov 2020. According to the authors, consuming smaller quantities of higher-price product categories (meat-based products, alcoholic beverages, prepared meals) and larger quantities of lower-price product categories (fruit and vegetables, legumes) may be a way to lessen the impacts of higher prices on food expenditure.

⁴⁴ <https://enquetes.frc.ch/marges>

⁴⁵ The French example ([Observatoire de la formation des prix et des marges des produits alimentaires](#)) could be improved by providing greater transparency on individual processors’ and retailers’ margins, as opposed to displaying average data which is not meaningful.

4.1.4. The role of competition policy

Competition law can play an important role in the needed transition to a more sustainable economy. While benefits of transitioning towards more sustainable agricultural practices and food supply chains can exist for consumers, farmers and businesses, **competition policy must make sure that the burden of this transition does not fall on consumers alone but is instead shared fairly between all levels in the food supply chain.**

Cooperation agreements will be sometimes necessary to generate desirable sustainability outcomes for the economy and offer a wider choice of products that are more sustainable and environmentally friendly to consumers. However, the current cost-of-living crisis increases even more the temptation of companies to opt for greenwashing and/or unjustified and disproportionate price increases.

The wrong types of sustainability agreements and mergers not only boost prices but also restrict the sustainable choice, the food quality and/or lead to lack of needed sustainability innovation. Competition law enforcement must therefore closely review this, both in the areas of antitrust and merger control.

BEUC recommendations

- **Food prices must send the right signal** to consumers yet moving towards 'true pricing' of food should be done in a just and equitable way. This requires considering first and foremost supply chain measures and a repurposing of agricultural subsidies.
- To improve consumer access to healthy food (such as fruit and vegetables, pulses), national governments should be encouraged to **subsidise and/or lower/eliminate VAT on these products.**
- National governments must have **adequate social policies** in place to guarantee access to sustainable healthy diets for all. They should also foster greater **transparency on price formation and margins** in the food supply chain.
- National governments must prevent that businesses use **sustainability as a cover (greenwashing) to hide anti-competitive practices** leading to less choice and/or higher prices for consumers.

4.2. Promoting foods which contribute to sustainable healthy diets

4.2.1. Marketing unhealthy food to children must stop

Consumer food purchasing decisions are strongly influenced by marketing – and young consumers are particularly vulnerable. Evidence is now 'unequivocal' that the marketing to children of foods which are high in fats, salt, and sugar (HFSS) has a strong impact on childhood obesity.⁴⁶

⁴⁶ Boyland E, Tatlow-Golden M. Exposure, power and impact of food marketing on children: evidence supports strong restrictions. *European Journal of Risk Regulation* 2017;8(2):224-236.

A report published by BEUC in 2021 showed that **industry self-regulation is failing to adequately protect children from unhealthy food marketing and advertising**, and instead advocated **EU binding rules including**:⁴⁷

- An online ban for the marketing of unhealthy food products, including food company websites and social media accounts.
- A 6am-11pm TV watershed to stop the broadcast of unhealthy food advertising when children watch TV the most.
- A ban on the use of marketing techniques appealing to children on food packaging (e.g., cartoon characters and brand mascots).

These rules should apply to children up to the age of 18, and the World Health Organization nutrient profiling model should be used to determine which foods should not be advertised to children.

BEUC also joined health, children, and family organisations in calling on the EU to regulate the cross-border marketing of food and minimise children exposure to nutritionally poor food marketing.⁴⁸

4.2.2. Getting EU promotion policy right

The EU itself is financing promotional campaigns designed to sustain, or even increase the demand for EU farm products within and outside the EU.

Despite evidence of meat (especially red and processed) consumption in the EU being above healthy eating recommendations and contributing significantly to the EU's food footprint, the EU continues to spend significant amounts of money to encourage consumption (and hence, production) of these products. According to the European Commission's own data, **between 2016 and 2019, 24% of the EU agricultural promotion policy budget were allocated to campaigns promoting meat and meat products**.⁴⁹

Because young adults in several EU countries tend to eat less meat (which benefits their health and the planet), promotion campaigns are increasingly targeting this group of consumers (e.g. "Love Pork" campaign run in Denmark and Sweden⁵⁰, "Let's talk about pork" campaign run in France, Spain and Portugal⁵¹). Some of these meat promotion activities even target children.⁵²

Cutting back on meat is a challenge for many consumers. Therefore, the last thing they need is EU-funded ads to promote meat consumption. To accompany and facilitate the shift in eating habits, the **EU promotion policy must be aligned with recommendations for healthy and sustainable diets**. Concretely, funds must be redirected to promoting fruit and vegetables, but also wholegrains, pulses and other foods Europeans should eat more of, while moving away from promoting products they should consume less of (incl. meat, but also alcoholic beverages).

⁴⁷ BEUC (2021). [Food marketing to children needs rules with teeth: A snapshot report about how self-regulation fails to prevent unhealthy foods to be marketed to children](#).

⁴⁸ <https://epha.org/wp-content/uploads/2021/11/call-to-protect-children-from-the-marketing-of-nutritionally-poor-food-final-november2021.pdf>. A blueprint Directive was drafted, which presents how the EU can use its powers to regulate health-harmful cross-border marketing.

⁴⁹ [https://www.europarl.europa.eu/RegData/questions/reponses_qe/2020/001576/P9_RE\(2020\)001576_EN.pdf](https://www.europarl.europa.eu/RegData/questions/reponses_qe/2020/001576/P9_RE(2020)001576_EN.pdf)

⁵⁰ <https://ec.europa.eu/chafea/agri/en/campaigns/love-pork>

⁵¹ <https://sopexa.com/fr/portfolio/lets-talk-pork-tout-ce-qu'il-faut-savoir-sur-la-filiere-porcine/>

⁵² The "Pork Lovers Campaign" featured playful ateliers and gifts for children, while the "Become a Beefatarian" campaign used children in several of its visuals.

4.2.3. Price and location promotions on unhealthy food must be restricted

Price promotions and prominent product positioning are two strategies frequently used by supermarkets to encourage customers to purchase products.⁵³ Research conducted by Which? in the UK found that over half of supermarket price promotions (53%) were on less healthy foods compared to healthier products (47%).⁵⁴ The consumer watchdog identified the balance of promotions on unhealthy foods, rather than healthier ones, as a key barrier for consumers looking to make better food choices.

Restricting the use of price and location (e.g. end-of-aisle, checkout) promotions on unhealthy foods in supermarkets and other retailers offers the potential to improve food choices.⁵⁵ Starting in October 2022, the UK has just introduced new world-leading rules to limit the prominent location of HFSS foods in stores. Rules restricting volume promotions on HFSS foods (such as 'buy-one-get-one-for-free' deals) were also due to be introduced at the same time, but the UK government decided to delay them by a year, arguing it needed more time because of the cost-of-living crisis and rising food prices.^{55,56} Yet, allowing price promotions on unhealthy foods to continue will only further push lower-income families towards diets that can harm their health, while costing them more money in the long-term.

Similar restrictions could be envisioned for promotions on foods of which consumption would need to decrease as part of the shift to sustainable healthy diets.

BEUC recommendations

To lead to an enabling food environment:

- The EU must **restrict the marketing and advertising of unhealthy food to children** under 18, both offline and online.
- In line with the Farm to Fork Strategy and EU Beating Cancer Plan, the EU must stop funding promotional campaigns for **agri-food products which are over-consumed from a health and/or sustainability perspective, such as red and processed meat.**
- National governments should be encouraged to introduce **restrictions on volume-price and location promotions** on foods that do not support the shift to sustainable healthy diets.

4.3. Making food products healthier and more sustainable by design

Where relevant,⁵⁷ food manufacturers should reformulate their products to gradually reduce salt, sugars and/or fat content, replace saturated fat with unsaturated fat, and reduce the energy density. In the Farm to Fork Strategy the Commission announced the setting of maximum levels for certain nutrients in food. Alternatively, public health authorities could define **binding targets to reduce levels of saturated fat, sugars, and salt** in food categories which contribute the most to excessive intakes of these

⁵³ WHO European Regional Obesity Report 2022. Copenhagen: WHO Regional Office for Europe; 2022.

⁵⁴ <https://www.theguardian.com/money/2016/aug/04/supermarket-price-promotions-targeting-less-healthy-food-survey-finds>

⁵⁵ <https://www.legislation.gov.uk/uksi/2022/1007/made/data.htm>

⁵⁶ <https://www.reuters.com/world/uk/britain-delays-ban-promotion-high-sugar-foods-2022-05-13/>

⁵⁷ This may not be feasible for some minimally processed products.

nutrients. Indeed, tests by consumer organisations have consistently found voluntary reformulation efforts by the food industry to be uneven and insufficient.⁵⁸

Food companies should also be encouraged to alter recipes to incorporate ingredients which Europeans need to eat more of – such as fruit, vegetables, wholegrain cereals, and pulses – and to reduce portion sizes (or at least offer a wider range of portion sizes, including smaller ones).

4.4. Clear labelling for better informed choices

Most consumers want sustainability information to become compulsory on food products, BEUC research found.⁵⁹ Yet today, this information is largely missing or when available it is often unclear, incomplete, and consumers are unsure whether they can trust it.

To prevent a proliferation of labels, some of which could confuse or even mislead consumers, the **FSFS will establish a general framework for sustainability-related food information**. Any label related to the sustainability performance of food products will have to comply with it. Such framework will give space for various systems to develop while ensuring they meet certain minimum criteria. Ultimately, it will be possible to evaluate which one works best with consumers.

The Commission has said this sustainable labelling framework will cover “the nutritional, climate, environmental and social aspects of food products”.⁶⁰ BEUC finds it essential that the various components of a food’s overall sustainability performance (see Box 3) should be **expressed via separate individual indicators, and not in the form of a synthetic score aggregating all sustainability dimensions**. Such format will serve to incentivise the minimisation of trade-offs between various sustainability dimensions. Specifically, it would ensure that a product cannot offset, say a poor environmental performance, with good socio-economic credentials – or the other way around.

The general framework for sustainability labelling should stipulate that indicators about the sustainability performance of food products should apply across the board and **highlight both the high and low performers**. Indeed, evidence shows that graded labels are more effective than endorsement logos, which only highlight the best performers in a category of products. To enhance consumer understanding and use, such information should also include an **interpretive element**, like colour-coding.

Finally, we wish to stress that **sustainability labelling can never replace a GMO label**. We understand the Commission may consider substituting GMO labelling for sustainability labelling or changing labelling requirements for certain new genomic techniques as part of an initiative on Plants produced by certain new genomic techniques due in the first half of 2023. **Clear labelling and traceability of GMOs, ‘old’ and ‘new’, is required for consumers.**

⁵⁸ In Norway, [Forbrukerrådet found uneven progress](#) in salt reformulation across different food categories and called for ambitious reformulation targets. In the Netherlands, [Consumentenbond found](#) that the current voluntary approach to product reformulation led to very little progress. Sometimes, reformulation claims by food companies do not withstand scrutiny by consumer groups: in Germany, [Verbraucherzentrale Hamburg found discrepancies](#) between Nestlé’s claims that it has improved the nutritional composition of its products over time and the actual composition of the companies’ products.

⁵⁹ BEUC, [One bite at a time: consumers and the transition to sustainable food](#), An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.

⁶⁰ European Commission, ‘Farm to Fork’ Strategy for a fair, healthy and environmentally friendly food system, 20 May 2020.

Box 3 – Individual components of sustainability labelling of food

Nutritional component: It should be in line with the legislative proposal for an EU-wide front-of-pack nutritional label (FOPNL). [BEUC supports the Nutri-Score](#) to become the EU-wide mandatory FOPNL, as evidence shows it is currently the best-performing label in helping consumers to compare the nutritional value of foods across a range of products.

Environmental component: The methodology should **drive changes in consumer food purchase decisions and agricultural practices which are in line with the Farm to Fork Strategy**. This includes reducing the use of pesticides, fertilisers, and antimicrobials, increasing the share of organic farming, improving animal welfare, and supporting the shift to more plant-based diets with 'less and better' animal source foods. BEUC and other civil society organisations have raised [concern over the Product Environmental Footprint \(PEF\) method](#), which is currently inadequate to measure the environmental performance of agri-food products. BEUC's position on environmental labelling of food is further developed [in this paper](#).

Social component: Some extremely important social aspects warrant regulation rather than labelling. They range from fair working conditions and the respect of labour rights (incl. no child labour) to decent incomes for farmers. Leaving it to consumers to avoid food produced under certain conditions may be unethical in the first place. Where social aspects are covered as part of a label, it should go beyond legal requirements and should come together with robust certification mechanisms so consumers can trust the information.

BEUC recommendations

- The FSFS should spell out meaningful and trustworthy principles and criteria which sustainability-related food information should comply with.
- The nutritional component should be based on the upcoming EU proposal for front-of-pack nutrition labelling.
- The environmental component should be designed to **steer consumer diets and agricultural practices towards outcomes in line with the Farm to Fork Strategy**. As such, it should allow comparing products *within* food categories (e.g. various types of meat, or conventional vs. organic meat) and *across* (e.g. animal vs. plant proteins).

5. Fostering action at all levels from farm to fork

The FSFS should guide and coordinate action across policy areas and governance levels to achieve a sustainable food system for the EU.

5.1. Member States

Many government sectors have responsibility for policies that affect food environments and the broader food system, including education, urban planning, taxation, etc. The national (or even local) level is where policy competence mostly lies for certain aspects, such as nutrition/health and consumption.

The development of food-based dietary guidelines (FBDGs) is an important part of national nutrition policies. These science-based recommendations for healthy eating are intended for consumer information, but they also serve to inform and orientate national health promotion policies. With a few exceptions,⁶¹ **EU countries' FBDGs currently fail to integrate the environmental dimension and should therefore be updated** to support the shift to sustainable healthy diets.⁶²

The FSFS should drive action by Member States in relevant areas in a way that matches and complements what can be done at EU level. BEUC supports the idea of Member States developing **'National Food Strategies' in the form of multi-annual action plans**.⁶³ A similar mechanism for official food controls could serve as an inspiration: Member States must draw up a multi-annual plan describing their food control strategy for an effective enforcement of EU food laws.

The FSFS should impose on Member States to actively involve stakeholders in the development of these National Food Strategies, and to report progress of their implementation.

BEUC recommendations

- Member States should integrate the environmental dimension in their national FBDGs and guide consumers towards diets which are better for both their health and the planet.
- The FSFS should require Member States to develop National Food Strategies detailing the actions to be taken at national level and the related monitoring/evaluation framework.

5.2. Food chain economic actors

Evidence is clear that **binding policy measures tend to be the most effective** in achieving change towards food sustainability.⁶⁴ Voluntary industry action (such as codes of conduct) should be considered only as supplementary drivers.

The FSFS should pave the ground for **new obligations and minimum sustainability requirements** for economic operators and their activities, covering all dimensions of sustainability. New minimum sustainability requirements would help rid the EU market from the least sustainable products and practices. They would need to be periodically

⁶¹ Denmark is one of the few countries having [updated national FBDGs to integrate the climate dimension](#). It has been estimated that if Danes would adopt the newly revised recommendations, they would not only improve their health status but could reduce emissions of greenhouse gases from their diet by about 35%. [Spain also recently updated](#) its dietary guidelines to integrate sustainability.

⁶² In France, for instance, the Conseil National de l'Alimentation (CNA) [recommended updating the national FBDGs](#) to take account of environmental aspects and reflect the need to move towards more plant-based diets.

⁶³ The idea has been developed in a policy paper by IEEP (see Baldock, D. and K. Hart (2021) '*Pathways towards a legislative framework for sustainable food systems in the EU*', Institute for European Environmental Policy) and is also considered as part of the impact assessment of the FSFS.

⁶⁴ SAPEA (2020a). *A sustainable food system for the European Union*. doi: 10.26356/sustainablefood. Retrieved from: <https://www.sapea.info/topics/sustainable-food/>

reviewed to keep abreast of new scientific knowledge and foster continuous improvement. They should apply to operations on the EU market but also to food imports to prevent pollution leakage to third countries and ensure fair competition for EU producers abiding by these higher standards.

Taking inspiration from the General Food Law provisions about operators' responsibilities regarding food safety, the FSFS should establish that food business operators are the primary responsible entity for meeting sustainability requirements applying to products and activities under their control.

BEUC recommendation

- The FSFS should pave the ground for new minimum sustainability requirements applying to food products (incl. imports) and operations and establish that food business operators shall be primarily responsible for complying with these new rules.

5.3. Consumers and consumer organisations

When given the means through enabling food environments and adequate social policies, consumers can play an active and positive role in the food system transformation, notably by eating sustainable diets and wasting less food at home.

Policymakers are generally wary of policies that can be perceived as interfering in people's daily lives. Yet the International Energy Agency's '10 points' plans to cut oil use⁶⁵ and the EU's dependence on Russian gas⁶⁶ both put forward a mix of measures, some of which directly address and seek to influence the demand side. They could serve as a source of inspiration for **public-facing communication campaigns** aimed at encouraging more sustainable food habits among citizens.

Consumer organisations do a lot to promote sustainable food habits. For example, they raise awareness among consumers on the sustainability impacts of their food choices and help them recognise trustworthy food labels and what they stand for.⁶⁷ They provide consumers with plant-based recipes good for health, the wallet and the planet,⁶⁸ and with tips to cut food waste. They also play a key role in bringing the consumer perspective to the policy debate for well-designed policies which benefit consumers and society at large. Additional resources would make it possible for consumer organisations, especially in less affluent Member States, to step up their activities related to sustainable food consumption and food systems.

Finally, BEUC reminds the European Commission of the importance to link the FSFS and the new obligations and responsibilities it will establish with Directive (EU) 2020/1828 on representative actions for the protection of the collective interests of consumers, with a view to creating an enforceable consumer right to healthy and sustainable food environments.

⁶⁵ https://iea.blob.core.windows.net/assets/faeb3d2d-35b9-4e70-b162-800c32a5866a/10-Point-Plan-to-Cut-Oil-Use_Summaryinfographic_English.pdf

⁶⁶ <https://iea.blob.core.windows.net/assets/c7503b68-528f-44f7-8196-ce0c3aad6030/10PointPlanToReducetheEuropeanUnionsRelianceonRussiaNaturalGasinfographic.pdf>

⁶⁷ See for instance [work by the Slovenian consumer organisation, ZPS](#) on sustainability labels on chocolate and palm oil.

⁶⁸ See for instance [meat-free recipes proposed by the Belgian consumer organisation, Test Achats/Test Aankoop](#) who invited their members to take part in a 'veggie challenge' over the month of March 2022.

6. Conclusion

Fighting the climate crisis and protecting our environment requires profound changes to the way we live, incl. what and how much we eat and how it is produced.

With the FSFS, the EU has a unique opportunity to build a sustainable food system which operates within planetary boundaries. This requires a comprehensive, system-based approach that addresses both the supply and demand sides.

Yet to avoid that ambitious policy action to transform the EU food system is met with resistance by parts of society, incl. some groups of consumers, policymakers must pay **attention to the transition being also socially just and benefitting the planet and people alike**. Bearing this in mind, BEUC and our members will actively contribute to the upcoming policy discussions on the FSFS and advocate a well-designed law which guarantees easy, equitable and affordable access to sustainable healthy diets for all European consumers.

ENDS

