



CUES

CONSUMERS' UNDERSTANDING OF EATING SUSTAINABLY



D5.1

Report on landscape of EU policies and good practices at national and sub-national level

Fair Trade Advocacy Office (FTAO)

28/02/2026



Funded by
the European Union

Document Information

Issued by:	Fair Trade Advocacy Office (FTAO), Heidelberg University (UHEI)
Issue date:	28/02/2026
Due date:	28/02/2026
Work package leader:	Fair Trade Advocacy Office (FTAO)
Dissemination level:	Public

Document History

Version	Date	Modifications made by
1	21/01/2026	First draft version sent to quality reviewers
2	11/02/2026	Feedback and suggestions received by quality reviewers
3	28/02/2026	Final version submitted to the EC

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Executive Summary

This report provides a comprehensive mapping of policies on sustainable food consumption, particularly through communication to consumers. Its primary objectives are to synthesise the main approaches EU-level policies take toward sustainable food consumption, identify key policy gaps, and analyse how national and regional best practices address these gaps and or move beyond them.

The policy mapping begins with a systematic review and analysis of EU policies (legal acts) published between 2015 and 2025, complemented by an assessment of relevant unpublished (unadopted) initiatives. More than 1,500 policy documents were screened for relevance. Relevant policies addressed communication about sustainability to consumers and or promoted sustainable or ethical food consumption. Published policy texts were obtained from the [EU SDG policy mapping](#) and [EUR-Lex database](#). Unpublished policy documents were obtained from the [Legislative Train](#) and [Legislation in Progress](#) platforms. In total, 78 published policies and 23 unpublished policies were identified as relevant. Identified policies were analysed using an inductive coding approach and a structured keyword search, allowing for both thematic categorisation and the identification of recurring emphases and omissions. This analysis of individual policies is then contextualized with a detailed discussion of the broader EU-level policy frameworks from the relevant European Commission mandates (2014-2019, 2019-2024, 2024-2029). Gaps are then identified in the EU-level policies and policy frameworks, and lastly a review of national and regional best practices that illustrate how both sustainable food consumption and policy gaps at the EU-level are addressed in practice across Member States.

Summary of Key Results

Topic	Results
Codes	<ol style="list-style-type: none"> 1) Food labelling: published policies provide sustainability information to consumers; unpublished policies do this and remove unsustainable products from the market. 2) Promoting agroecological practices: published policies focus on research initiatives, whereas unpublished policies target food systems through broader policy frameworks. 3) Monitoring: published policies focus on food safety and organic production), whereas unpublished policies focus on broad environmental regulations (e.g., soil, unsustainable fishing, waste).

Keywords	<ol style="list-style-type: none"> 1) The main emphases for all policies are environmental concerns and food labelling 2) Value chain keywords are used more frequently in unpublished policies compared to published policies, particularly <i>food waste</i>, <i>food systems</i>, and <i>pesticides</i>.
Frameworks	<ol style="list-style-type: none"> 1) Sustainable consumption is primarily framed through environmental and climate objectives 2) A gap persists between strategic ambition (e.g. food systems transformation) and legislative delivery 3) Governance relies heavily on information-based and coordination instruments rather than binding consumption-shaping measures 4) Political sensitivity and subsidiarity concerns constrain more interventionist approaches 5) Despite “food systems” language, governance remains fragmented across sectoral domains
Gaps	<ol style="list-style-type: none"> 1) Consumers are mainly addressed as recipients of information rather than actors embedded in food environments 2) Explicit ethical language is used sparingly; fairness-related concepts are framed technically rather than normatively 3) Health integration within sustainability discourse remains limited 4) Binding EU-level targets addressing consumption patterns are largely absent 5) Economic levers (e.g. fiscal tools) are weakly articulated at EU level
Best practices at national and regional level	<ol style="list-style-type: none"> 1) Sub-national authorities use structural food environment interventions (e.g. procurement, school schemes) 2) Some Member States apply fiscal and economic incentives to influence consumption 3) Health and sustainability are more frequently integrated at local and national levels 4) Social and affordability dimensions are more explicitly addressed in certain best practices 5) Progress is uneven, creating risks of fragmentation across the EU

The analysis of EU policies reveals a regulatory framework that has developed clear strengths in certain areas of sustainable food consumption, while leaving significant gaps unaddressed. At EU level, the most pronounced strengths lie in efforts to regulate consumer information, food labelling and the prevention of misleading environmental claims, as well as in the promotion of agroecological practices through research, strategies and sectoral legislation. EU policies have also been effective in setting common objectives and minimum standards, particularly regarding environmental sustainability, monitoring, and market surveillance. These elements provide legal certainty and a shared policy direction, enabling Member States to act within a harmonised framework.

At the same time, several structural gaps persist at EU level. Published policies remain heavily focused on information provision and voluntary measures, with limited use of binding instruments to shape food environments, affordability or consumption patterns directly. Social and ethical dimensions of sustainable consumption, including fairness in value chains, and economic inequalities among consumers, are addressed unevenly or indirectly. Moreover, the absence of coherent EU-wide approaches to fiscal measures, food public procurement, sustainable dietary guidance and food environments has resulted in fragmented implementation and variable ambition across Member States.

Unpublished EU initiatives and broader policy frameworks reveal more ambitious goals, showing greater willingness to influence food environments, putting greater emphasis on sustainable value chains. However, many of these initiatives have been delayed, narrowed in scope, or withdrawn, limiting their impact. The gap between strategic ambition and legislative delivery is a recurring feature, reflecting political sensitivity, subsidiarity concerns and resistance from key stakeholders. As a result, several flagship EU initiatives with potential relevance for sustainable consumption have not translated into binding or coherent policy instruments.

National and regional best practices have addressed some of these gaps more decisively. In particular, sub-national action has been most effective in areas where EU policies provide legal space but limited direction. Public food procurement, sustainable dietary guidelines, fiscal incentives and food-environment interventions illustrate how national and local authorities have gone beyond EU minimum requirements to influence availability, affordability and default choices. These practices demonstrate that, where political will exists, sustainable consumption can be supported through structural measures rather than relying solely on informed individual choice.

However, not all EU-level gaps have been effectively addressed through national and regional action. Measures tackling social sustainability across global value chains, affordability for low-income consumers, and the harmonisation of sustainability standards remain limited or uneven. In areas requiring strong coordination, market-wide consistency or binding obligations, national initiatives alone have proved insufficient to compensate for the absence of EU-level leadership. As a result, progress in these domains remains partial and uneven, reinforcing disparities between Member States and regions.

Overall, the findings suggest that although EU policies provide important foundations through common objectives, minimum standards and consumer protection mechanisms, their limited ambition in key areas constrains the scale and coherence of change. National and regional best practices demonstrate the potential of more structural and binding approaches but also highlight the risks of fragmentation in the absence of stronger EU-level leadership. Addressing these gaps would be essential to ensure that sustainable consumption is supported consistently across the EU and does not remain dependent on uneven national and regional initiatives.

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List of Terms and Definitions

Table 1: Terms and Definitions

Acronym	Meaning
BEUC	European Consumer Organisation
CAP	Common Agricultural Policy
CEAP	Circular Economy Action Plan
CEJA	European Council of Young Farmers
CMO	Common Market Organisation
COPA-COGECA	Committee of Professional Agricultural Organisations – General Confederation of Agricultural Cooperatives
CSO	Civil Society Organisation
CUES	Consumers’ Understanding of Eating Sustainably
DG	Directorate-General
DG SANTE	Directorate-General for Health and Food Safety
EC	European Commission
ECA	European Court of Auditors
ECOS	Environmental Coalition on Standards
EEB	European Environmental Bureau
EFSA	European Food Safety Authority

EPP	European People's Party
EPRS	European Parliament Research Service
EU	European Union
EU	European Union
EUDR	European Union Deforestation Regulation
EUFLR	European Union Forced Labour Regulation
EUOR	European Union Organic Regulation
FIC	Food Information to Consumers Regulation
F-POD	Food Policy Observatory Database
FTAO	Fair Trade Advocacy Office
GA	Grant Agreement
JRC	Joint Research Centre
MEP	Member of the European Parliament
NGO	Non-Governmental Organisation
PAN	Pesticide Action Network
SDG	Sustainable Development Goal
SF4C	School Food 4 Change
SME	Small and Medium-sized Enterprise
SUR	Sustainable Use of Pesticides Regulation
UHEI	University of Heidelberg
UTP	Unfair Trading practices
VAT	Value Added Tax
WP	Work Package

1. Introduction

1.1 Aims

The Consumers' Understanding of Eating Sustainably (CUES) is a Horizon Europe project which aims at creating a more sustainable food system through a focus on consumers. A way to encourage more sustainable food consumption is via public policies that influence food choices. Food sustainability policies take a variety of approaches toward this aim, including regulating what and how sustainability information is communicated to consumers, and limiting the availability of unsustainable products. But the food sustainability policy landscape is large and complicated. It remains unclear which consumer-oriented approaches have been taken by existing policies overall and which have not. Without such a "map" of this landscape, future policy can neither systematically develop, nor continue pushing existing policy topics forward or to move in unexplored directions.

This policy mapping provides this information by identifying the strengths and gaps of the food policy landscape on sustainability from 2015 to 2025. It includes an analysis of consumer-oriented policies at the European Union (EU) level, as well as an overview of best practices at national and regional levels. The result is a comprehensive mapping of the last decade of food sustainability policy in the EU, that will encourage the development of a more sustainable food system in the EU and hopefully beyond.

1.2 Roadmap

Here a brief overview of each section of the report is provided as a guide:

Section 2 describes the methods used in the policy mapping analysis. These include the policy databases reviewed; how relevant policies were identified, retrieved, and coded; as well as how the keyword searches were conducted.

Section 3 describes the key themes uncovered in the policy mapping results, revealed through the coding process and keyword searches. The section first discusses published policies, focusing on how their emphases changed from 2015 to 2025. This is followed by a discussion of unpublished policies, which compares them to their published counterparts.

Section 4 examines the broader EU policy frameworks that shape action on sustainable food consumption, focusing on strategies, action plans and long-term visions rather than individual legislative acts. It traces the evolution of these frameworks across successive legislative periods, from the initial integration of sustainability considerations in 2014–2019, through the heightened ambition of the European Green Deal and the Farm to Fork Strategy in 2019–2024, to early developments in the 2024–2029 period. In doing so, it highlights how priorities, levels of ambition and policy framing have shifted over time, as well as the recurring gap between strategic objectives and legislative delivery. The section ends with an analysis of these policy frameworks, focusing on how different frameworks conceptualise

sustainable food consumption, the role attributed to consumers and markets, and the balance between voluntary approaches, regulatory intervention and governance mechanisms. This analysis highlights recurring patterns, tensions and inconsistencies across frameworks, providing a more integrated understanding of how EU policy approaches have evolved over time.

Section 5 identifies the main gaps emerging from the analysis of EU policies and frameworks, and **Section 6** groups these gaps into thematic clusters. These sections examine thematic areas that remain weakly addressed, including social and ethical dimensions of sustainability, food environments, affordability and system-level governance. The sections also consider structural and implementation-related gaps, such as the reliance on information-based tools, voluntary commitments and soft coordination, and explain how these limitations constrain the EU's ability to influence food consumption patterns more effectively.

Section 7 turns from EU-level analysis to practice on the ground, examining how national and regional authorities have addressed some of the gaps identified in previous sections. It explores how Member States and sub-national actors have adopted measures that go beyond existing EU requirements, demonstrating alternative and more structural approaches to supporting sustainable food consumption.

The final section, **Section 8**, synthesises the main findings of the report and reflects on their implications for future EU policy development. It revisits the central question of whether EU policies primarily enable or actively drive sustainable food consumption and considers what would be required to strengthen the EU's role, including greater attention to food environments, social sustainability and system-level governance. Lastly, the report outlines key considerations for aligning strategic ambition with effective, coherent and inclusive policy instruments across EU, national and sub-national levels.

2. Policy mapping methods

2.1 Selection of food policy databases

Researchers began by reviewing food policy databases for sources of relevant published policies. The databases that were reviewed are given in the following list. The **EU KnowSDGs Platform** proved to be the most comprehensive, as it included all the policies later identified as relevant in other databases, together with direct access to official policy texts.

- The **EU KnowSDGs Platform** tracks progress on sustainability indicators aligned with EU goals.
- **F-POD** provides detailed documentation on food policy implementation across governance levels, focusing on public health and sustainability.
- **FIT4FOOD2023**, part of Horizon 2020, emphasises research and innovation in sustainable food systems, and offers diverse and recent perspectives across health, sustainability, and innovation.
- **NOURISHING** highlights health related policy actions combating obesity and non-communicable diseases.

Researchers also consulted two sources of unpublished EU policies, described in the list below. These platforms report the legislative status of all initiatives they list, and all such states except for “adopted/completed” or “adoption” were considered unpublished. These initiatives, which were not fully implemented or advanced, provide valuable insight into emerging trends and remaining gaps within the EU political landscape.

- **EU Legislation in Progress** is a platform managed by the **European Parliamentary Research Service** (EPRS), offering systematic analyses of major EU legislative proposals. It provides stakeholders with detailed insights into proposals at every stage of the legislative process.
- **Legislative Train Schedule** is a platform managed by the European Parliament that outlines the main components of the EU institutions' work programme. Organised into thematic categories, it offers access to a wide range of legislative initiatives and helps track their progress.

2.2 Policy scope and timeline

The policy review encompassed both published and unpublished EU policies. To structure the timeline of the analysis, researchers focused on the following European Parliament legislatures: 2014–2019, 2019–2024, and 2024–2029. Accordingly, the timeframe for the review was set from 2015 to end of 2025, as the deliverable was set for early 2026.

2.3 Identification and retrieval of relevant policies

2.3.1 Criteria for relevance

Once the policy databases had been selected, the task was to identify relevant policies within them. The criteria for relevance were taken from the specific aims of CUES Task 5.1, and from the CUES project goals more generally, as described in the table below. Accordingly, policies influencing “inclusive and smart ways to communicate sustainability of food,” policies on sustainable claims and labels, as well as policies “designed to promote sustainable and ethical consumption of food products” were included. Primary emphasis was placed on *sustainability* and *sustainable food consumption* rather than on ethical consumption of food.

Sustainability and *sustainable food consumption* can be defined in a variety of different ways. The research team decided to leave the definitions of these terms open at the outset, to privilege those used in the policies examined.

Table 2: Policy identification criteria

Criteria	Description
CUES WP5 Aim	“To assess existing EU policies and good practices at the national and sub-national levels that influence inclusive and smart ways to communicate sustainability of food” (CUES proposal, p.192/206).
CUES T5.1 Work Description	“EU policies on sustainable claims, labels, and policies designed to promote sustainable and ethical consumption of food products” (CUES proposal, p.192/206).
Policy Type and Time Period	Published and unpublished legal acts (<i>directives, decisions, regulations, recommendations, declarations, resolutions</i>) issued from 2015 through 2025.

2.3.2 Policy identification and retrieval

Relevant sections of each policy database were selected and then divided among researchers. Policies within those databases were then identified as relevant based on a review of policy titles and summaries. Inclusion was privileged over exclusion to avoid errors of omission. Identified published policies were then retrieved from the EU SDG database mentioned earlier (via links to the [EUR-Lex database](#)), and unpublished policies from the Legislative Train Schedule and EU Legislation in Progress platforms described above. The texts of unpublished policies included: working drafts, upcoming legislative proposals, communications, and other grey literature. In total over 1500 policies were reviewed for relevance.

2.4 Analysis

2.4.1 Coding identified policies

After identifying relevant policies, the research team moved on to the coding phase, a process used to organise and make sense of large amounts of information. In this context, coding involved examining the policies in greater detail and assigning each to a code that described its focus, approach, and objectives.

The coding process began with each team member independently reviewing a subset of identified policies and then creating codes for those policies. The research team decided on a guideline of five codes per coder, as a number that would highlight similarities among policies, while allowing enough room to document variety. No other restrictions on the content of the codes were imposed. This approach, known as [inductive coding](#), allows the analysis to stay open to unexpected or emerging ideas, rather than forcing policies into pre-established codes from the outset. Once all team members had completed their initial review, they came together to discuss their findings and establish a common set of codes for all identified policies. This process produced clear, consistent codes that were relevant to all the policies analysed.

Five codes were created:

1. Support for citizens' initiatives

This code refers to mechanisms and instruments that enable EU citizens to actively participate in policymaking by proposing new legislation or policy measures. Through tools such as the [European Citizens' Initiative](#), citizens can organise campaigns, gather signatures, and formally submit policy proposals to EU institutions, thereby helping to shape the legislative agenda and highlighting societal concerns that may otherwise be overlooked. The policies included in this code highlight several such overlooked concerns that are relevant to sustainable and ethical food consumption.

2. Authorising or refusing to authorise health claims made on foods

This code involves the regulatory evaluation of statements made on food products regarding their health benefits. EU authorities assess the scientific evidence supporting such claims and either grant authorisation or refuse it. Although the policies included in this code do not directly address sustainable or ethical food consumption, they were included because they represent an important means of communication about food to consumers, and involved health, a theme explored in the keyword search portion of the analysis (see below for details).

3. Food labelling and information to consumers

This code encompasses legislation governing the information provided on food packaging, including nutritional content, origin, and sustainability aspects. The policies included in this code thus promote sustainable (but as reported later, not ethical) food consumption through communication about such topics to consumers.

4. Monitoring

In this context, monitoring refers to the establishment and oversight of targets, indicators, and compliance mechanisms relevant to sustainable and ethical food consumption within the food system. The policies included in this code set measurable objectives, track adherence to legal requirements, enforce due diligence obligations, and take corrective action where rules are not met. Accordingly, they promote sustainable and ethical food consumption not through communication to consumers, but instead by monitoring compliance with relevant regulations.

5. Promotion of agroecological practices, including research initiatives

This code encompasses policies designed to encourage agroecological practices, i.e., applications of ecological principles to agriculture. Accordingly, these policies typically aim directly at food sustainability goals. Policies in this group take a variety of approaches, including setting regulatory frameworks that support sustainable farming, providing financial incentives or subsidies for environmentally friendly food production, and funding research on agroecology to inform policy development.

6. Food environments

This code captures policies that shape food choices through social, institutional and cultural contexts rather than through information or market signals. These policies promote sustainable and or ethical food consumption by, for example, making sustainable and ethical food choices more available than less sustainable and ethical alternatives. Such measures thus influence the broader food environment in which food consumption takes place.

2.4.2 Keyword search

Following the coding process, the research team conducted a more detailed analysis of the identified and retrieved policies with a structured keyword search. This analysis aimed to identify how frequently and in what context key terms in food sustainability appeared in relevant EU policies. Researchers used a targeted digital search method (applying the Ctrl+F function) to search for key terms in each policy document. This technique enabled the identification of patterns, recurring language, thematic strengths, and potential gaps in coverage across the policy landscape.

A total of thirty-four keywords were selected by team members with expertise in food policy. Selections were guided by the thematic scope and analytical framework of the CUES project, and thus reflect the project's core areas of interest. Crucially, variants of the keywords were also used in the keyword search. For example, searches for the term "sustainability" included variants such as "sustainable." This more flexible approach allowed the keyword search to capture a wider range of relevant policy content.

For clarity and consistency, the keywords were further organised into five thematic categories: Environment, Consumers, Value chains, Cross-cutting categories, and Health. These categories provided a structured lens through which to interpret the results and facilitated the comparison of findings across different types of policies, and the identification of policy gaps. The categories together with the keywords contained in each are shown in the table below.

Table 3: Keyword search categories

Theme	Keywords	
Environment	<ul style="list-style-type: none"> - Biodiversity loss - Environmental impact 	<ul style="list-style-type: none"> - Greenhouse gas emissions - Pesticides
Consumers	<ul style="list-style-type: none"> - Consumer behaviour - Consumer information - Consumer trust - Food consumption patterns - Greenwashing - Food choice 	<ul style="list-style-type: none"> - Food culture - Food democracy - Food environment - Food labelling - Economic inequality - Ethical food consumption
Value Chains	<ul style="list-style-type: none"> - Ethical food production - Fair trade - Food security - Food sovereignty 	<ul style="list-style-type: none"> - Food systems - Food value chains - Food waste - Small-scale producers - Short supply chains
Cross-cutting Categories	<ul style="list-style-type: none"> - Triple change - Sustainability - Policy change 	<ul style="list-style-type: none"> - Food environment - Cultural transition
Health	<ul style="list-style-type: none"> - Non-communicable disease - Ultra processed foods 	<ul style="list-style-type: none"> - Healthy diets - Meat - Plant-based

3. Policy mapping

This section focuses on policy “strengths,” that is, frequently discussed themes in the policies reviewed. These themes are derived from the results of the coding process and keyword search described above. First, the strengths of published policies are described (Section 3.1), focusing on their approaches and how they meet the criteria for relevance used. The discussion of unpublished policies that follows (Section 3.2) compares strengths between unpublished and published policies. Each of these two subsections ends with a summary of the main results, and includes some brief notes on “gaps,” i.e., themes that are rarely discussed. Sections 5 and 6 review these gaps in detail.

3.1 Published policies

3.1.1 Codes

A total of 78 relevant *published policies* were retrieved and coded. The resulting codes and the number of policies in each are presented in the table below.

Table 4: Published policy codes

Codes	Number of published policies
1. Support for citizens’ initiative	7
2. Authorising or refusing to authorise health claims made on foods	31
3. Food labelling and information to consumers	17
4. Monitoring	14
5. Promotion of agroecological practices, including research initiatives	9
6. Food environments	0

Only a small number of published policies reviewed (78 of over 1500) met the criteria for relevance described above, even when privileging inclusion, as the research team did. The policies that most clearly met these criteria (i.e., policies influencing “inclusive and smart ways to communicate sustainability of food,” policies on sustainable claims and labels, and policies “designed to promote sustainable and ethical consumption of food products”) are in Codes 1, 3, and 5. The policies in Code 4 do not address communication about ethical or sustainable food consumption to consumers, but they involve monitoring aspects of ethical and sustainable food consumption. Code 2 contains policies that regulate health claims (an important form of communication about food to the public), but these policies

do not mention ethicality or sustainability of food. There were no policies in Code 6. The codes are discussed in descending order of relevance below.

A) Food labelling and information to consumers

The group of published policies that most directly address the aims of this policy mapping are those on food labelling and information (Code 3). These policies primarily influence what information about food is available to the public. They also constitute the second largest group of relevant policies, indicating that food information is a key topic of food policy from 2015 to 2024 (the years during which these policies were published). This group consists of policies regulating geographical indications (GIs), the labelling of organic food, and information communicated to consumers regarding food quality, pesticides, and environmental sustainability and impacts. It also includes regulations on food or agricultural products in the interests of consumer safety and protection. Most of the information regulated by these policies is relevant to sustainability, thus meeting the first criterion for relevance described above, regarding the provision of sustainability information to consumers (see the first row of Table 2). However, the direct promotion of sustainable and ethical food consumption (the second criterion for relevance, see the second row of Table 2) are rarer. Only one policy on [empowering consumers for the green transition](#) promotes sustainable food consumption, and none promotes ethical food consumption. All policies in this group are listed in Table A3 in the appendix.

B) Promotion of agroecological practices, including research initiatives

Policies promoting agroecological practices (Code 5) constitute the second most relevant group of published policies. These policies were issued between 2017 and 2024, and established large-scale research programs such as [PRIMA](#), [LIFE](#), and [Horizon Europe](#), which aimed to advance sustainable farming and climate resilience. Although these programs are vast and encompass a wide variety of research topics, they all promote sustainable and ethical food consumption (the second criterion for relevance discussed above), primarily through research and innovation. As an example, the CUES project is funded by Horizon Europe. Other policies in this group established best practices for environmental management and set sustainability requirements for products produced or sold in the EU, both of which also promote sustainable and ethical food consumption. All policies in this group are listed in Table A5 in the Appendix.

C) Monitoring

The third most relevant group of policies was published from 2017 through 2024. This group promotes sustainable and ethical food consumption by monitoring compliance with sustainable and ethical food production regulations. The regulations involve animal welfare and plant health, products and substances allowed in the production of organic food, [sustainability reporting standards](#), [unfair trading practices](#), and [prohibiting products made with forced labour](#). Although "sustainability" primarily refers to *environmental* sustainability in the policies analysed in this review, the last two policies in this list adds *social* sustainability to the discussion. The policies in this group can be found in Table A4 in the Appendix.

D) Citizen participation

The fourth most relevant group of policies support citizen initiatives calling for transparency and sustainable practices in food production and labelling (Code 1). Policies in this group emerged between 2018 and 2022, in a more limited period than policies in either of the preceding codes. These policies meet both criteria for relevance used here, as they register citizen-led initiatives that strongly promote both communication about food sustainability to consumers and ethical and sustainable food consumption. These initiatives aimed to make available information regarding origin, nutrition, and environmental impact on food package labelling, phase out synthetic pesticides to restore biodiversity and support farmers in the transition, and make vegan alternatives for food and drink widely available. However, these policies only registered requests for the proposed initiatives. They established no legal obligation to implement the sustainable practices recommended. Moreover, two of the seven policies in this group are not themselves initiatives, but instead regulate their logistics, specifically, “the extension of the periods for the collection of statements of support for certain European citizens’ initiatives.” The policies discussed here can be found in Table A1 in the Appendix.

E) Health claims

This last group of policies, issued from 2015 through 2023, is the largest by far, but the least relevant for the purposes of this review. These policies either authorise or refuse to authorise health claims regarding food (Code 2), though the majority are in the latter group. The health claims concerned are varied and highly specific. Policy examples include: refusal to authorise a causal relationship between the consumption of olive leaf water and glucose intolerance, and the consumption of sugar-free hard confectionery with at least 90 % erythritol and reduction of dental plaque. Even though these policies do not address ethical or sustainable food consumption, they are included in this mapping because the large number of such policies relative to those in the other codes indicates that this is an important means of communicating information to the public about food consumption, and because it illustrates a clear separation between health on the one hand and sustainable and ethical food consumption on the other. As discussed in the keyword search results for both published and unpublished policies, health is clearly not a theme of the policies reviewed here. Thus, the communication of health information about food consumption is not combined with either the communication of sustainability information or the promotion of sustainable or ethical food consumption.

3.1.2 Keyword search

The table below shows the 11 most and least used keywords in the 78 published policies analysed. The most used keywords are those used at least 20 times across all policies examined. All but one of the least used keywords are used at most twice across all policies examined.

Table 5: Most and least used keywords in published policies

Most used	Count	Least used	Count
Sustainability	665	Food environment	3
Food labelling	248	Food value chain	2
Biodiversity loss	233	Plant-based	2
Environmental impact	127	Economic inequality	2
Meat	105	Non-communicable disease	2
Consumer information	75	Food choice	1
Fair trade	56	Food culture	1
Pesticides	55	Food democracy	0
Greenhouse gas emissions	49	Food sovereignty	0
Small-scale producers	44	Greenwashing	0
Consumer trust	24	Triple change	0

The keyword analysis of published policies reveals that the most used keywords relate to **environmental concerns** and **food labelling**.

The results of the keyword search reveal that first, environmental concerns, and second, food labelling, dominated the 77 published policies analysed. **Sustainability** (and “sustainable”) is by far the most used keyword, appearing **665** times in the published policies: more than twice as often as the second most used keyword. Although sustainability can (and arguably should) be used in non-environmental contexts, examination by the research team suggests that this term is typically used in the context of environmental sustainability in the published policies reviewed here. The other keywords that signal environmental concerns included: **biodiversity loss (233 occurrences)** and **environmental impact (127 occurrences)**. Together, these three terms are among the five most used keywords overall. Clearly, environmental concerns are the primary theme in food policy on sustainability communication and the promotion of sustainable and ethical consumption. The second most used key word is **food labelling (248 occurrences)**. A related term, **consumer information**, appears much less frequently, only **75 times**. This suggests that food labelling, arguably the more specific of the two terms, is emphasized far more than consumer information. To summarise, environmental concerns and food labelling are the major themes in food policy on sustainability and its communication.

Meat is also used frequently, appearing **105 times**. Most of these occurrences are in Monitoring policies (Code 4) that establish quality standards relating to animal health and welfare. These policies emphasise quality standards rather than ethical concerns, though of course the concepts are related. As will be described briefly in the summary below, ethical concerns are largely absent from the published policies reviewed here. A few of those in which the keyword “meat” appears address organic production specifically, but this remains a minor concern relative to general quality control. It is also worth noting

that this keyword does not appear in the context of reducing meat consumption in the interests of sustainability or health (the thematic category that includes this keyword, see Table 3 above). Thus, discussions of meat in the published policies reviewed here primarily occur in the context of quality control rather than of ethics, sustainability, or health.

3.1.3 Summary

To summarise, the primary themes of policies communicating and promoting sustainable food consumption from 2015 to 2025 are first, environmental concerns, and second, food labelling. Moreover, given the recent appearance of policies specifically targeting sustainability through food labelling, there may be increasing overlap between the two themes in the near future. A tertiary theme is the promotion of agroecological practices, particularly through large-scale research initiatives. Throughout this period, the EU has consistently supported research on sustainability, support which began well before the appearance of legislation clearly targeting sustainability in other realms (e.g., in food labelling and monitoring)

The results of the coding process and keyword search also point to several major gaps, that is, underemphasised themes in published policies in this period. These include: 1) the near absence of the word “ethical”; and the infrequent use of most keywords related to 2) value chains, 3) consumers, and 4) health (see Table 3 above for the keywords in each of these categories).

First, **ethical food consumption** and **ethical food production** occur rarely in the published policies examined here (**only 4 times**), but as discussed above, the mapping uncovered several policies related to these topics. This suggests that the term “ethical” is not commonly used in published policies on these topics. In contrast, a related term, **fair trade**, is used far more frequently (**56 times**), and even though 53 of those occurrences are in a single Monitoring policy on [unfair trading practices](#), it suggests that “unfair” is a more accepted way of talking about “(un)ethical” food production.

Second, keywords related to value chains occur infrequently. These include **ethical food production** and **fair trade**, as just discussed, as well as **food security (13 occurrences)**, **food sovereignty (0)**, **food systems (12)**, **food value chains (2)**, **food waste (17)**, **small-scale producers (44)**, and **short supply chains (3)**.

Third, most terms related to consumers occur rarely in published policies, with the obvious exception of **food labelling**, the second most used keyword in the published policies examined, as well as the more moderate exception of **consumer information**, as discussed above. However, the remaining terms are nearly absent: **consumer behaviour (10)**, **consumer trust (24)**, **food culture (1)**, **food democracy (0)**, **food environment (3)**, **food consumption patterns (7)**, **greenwashing (0)**, **food choice (1)**, **economic inequality (2)**, and **ethical food consumption (4)**.

Lastly, all health-related keywords except **meat** occur infrequently: **non-communicable disease (2)**, **ultra processed foods (17)**, **healthy diets (3)**, and **plant-based (2)**. In addition, **meat** occurs primarily in the context of food safety and not in the context of reducing meat consumption to promote healthier

and more sustainable diets. As mentioned earlier, these gaps will be discussed in further detail in a later section of the report.

3.2 Unpublished policies

3.2.1 Codes

The coding process resulted in the retrieval and coding of 23 relevant *unpublished policies*. These policies were identified in the Legislation in Progress and Legislative Train platforms described above. As a reminder, the research team classified all policies without the status “adopted/concluded” or “adoption” at the time of retrieval as unpublished policies. Accordingly, the policy texts examined are not legislative acts but proposals, communications, working documents, etc. The table below lists the number of relevant unpublished policies included in each code.

Table 6: Unpublished policy codes

Codes	Number of published policies
1. Support for citizens’ initiative	0
2. Authorising or refusing to authorise health claims made on foods	0
3. Food labelling and information to consumers	5
4. Monitoring	7
5. Promotion of agroecological practices, including research initiatives	10
6. Food environments	1

The distribution of unpublished policies among the established codes differs from that of published policies. The majority of unpublished policies are included in Code 5, and the remainder are mostly divided between Codes 3 and 4, with the exception of a single policy in Code 6. Nearly all these policies seek to encourage sustainable consumption. There are no unpublished policies regarding either health claims (Code 2), or citizen’s initiatives (Code 1). The codes are discussed below in order of relevance.

A) Food labelling and information to consumers

The unpublished policies in this group are the most relevant for the purposes of this review because they focus on both communicating sustainability information to consumers and promoting sustainable food consumption. Like their published counterparts, unpublished policies in this group do not promote ethical food consumption. Unpublished policies about **Food Labelling (Code 3)** employ two general approaches: 1) regulations on sustainability-related information provided to consumers; and 2) removal

or reduction of unsustainable products from the market. The first approach includes establishing or improving regulations on marketing or labelling standards, particularly regarding information on environmental impacts. The second approach includes policies that aim to reduce food packaging waste and the use of environmentally unsustainable chemicals. Compared to published policies on food labelling, unpublished policies more actively promote sustainable consumption, not only providing information to consumers, but removing unsustainable options from the market. The policies in this group are listed in Table A3 in the Appendix.

B) Promotion of agroecological practices, including research initiatives

Unpublished policies promoting agroecological practices are the second most relevant group because they promote sustainable and ethical food consumption, primarily by targeting food systems. These include Farm to Fork, the European Green Deal, A Vision for Agriculture and Food; The EU Biodiversity Strategy for 2030, and the Commission Work Programmes for 2023 and 2025. The texts of these policies are typically quite long and provide the bulk of the text in this group (which is important context for the keyword search results below). This group also includes a few policies seeking to promote the sustainable use of plant protection products and fertilisers. A clear difference between the unpublished and published policies in this code is that the focus on research in the latter is missing in the former. The policies in this group can be found in Table A5 in the Appendix.

C) Monitoring

The unpublished Monitoring policies reviewed here largely involve environmental regulations, and in so doing promote sustainable consumption. They aim to eliminate unsustainable fishing practices, preserve soil health, and minimize packaging waste. This group also contains a policy seeking to limit unfair trading practices in the agricultural and food supply chain, which promotes ethical food consumption. This last policy indicates a concern for *social* sustainability, which is also apparent in published Monitoring policies. A key difference between unpublished and published Monitoring policies, however, is their scope. Whereas the main targets of published Monitoring policies are organic production and the application of laws relating to plant health and animal welfare, unpublished Monitoring policies take aim at broader, environmental targets, such as waste and deforestation. The policies discussed here are listed in Table A4 in the Appendix.

D) Food environments

Only one unpublished policy is included in this code, but its approach was so unlike the others that the research team decided that it deserved its own code. Furthermore, as discussed in Section 4 below, the code helps make a key distinction among *policy frameworks*, which provide important context for the specific policies discussed here in Section 3. The policy included here is the [EU School Scheme](#) (also listed in Table A6 in the Appendix), which aims to provide fruit, vegetables, and milk to schools, in addition to educational activities about agriculture and healthy eating. This policy thus encourages sustainable food consumption by altering the food environment in which children make food choices. It likely also provides information about food sustainability through its educational activities, but the

modifications it makes to school food environments places it in this group rather than in the food labelling and information to consumers group.

3.2.2 Keyword search

The table below shows the 11 most and least used keywords in the 23 unpublished policies analysed. The most used keywords are those used at least 50 times across the unpublished policies. The least used keywords are those used at most four times across all policies examined.

Table 7: Most and least used keywords in unpublished policies

Most used	Count	Least used	Count
Sustainability	656	Food choice	4
Food waste	474	Food environment	4
Food labelling	273	Ultra processed foods	3
Environmental impact	239	Ethical consumption	2
Consumer information	120	Triple change	2
Food systems	102	Ethical food production	1
Pesticides	97	Plant-based	1
Fair trade	78	Cultural transition	0
Consumer trust	75	Food culture	0
Biodiversity loss	63	Food democracy	0
Greenhouse gas emissions	52	Non-communicable disease	0

The results of the keyword search in unpublished policies reveals: 1) similar emphasis as in published policies on **environmental concerns** and **food labelling**, and 2) stronger emphasis on **food waste**, **pesticides**, **fair trade**, and **food systems**.

1. Emphases shared with published policies: environmental concerns and food labelling

As in published policies, the most used keyword in unpublished policies is **sustainability (656 occurrences)**, and it is typically used in environmental contexts. This term appears with similar frequency in published policies (665 occurrences), but there are far fewer unpublished policies, which indicates a stronger emphasis on sustainability in unpublished policies. As for related terms, **environmental impact (239)** appears more frequently in compared to published policies (127), but the occurrence of **biodiversity loss** is considerably lower in unpublished policies (**63 occurrences**)

compared to published ones (233). This suggests that both unpublished and published policies prioritize environmental concerns, although unpublished policies emphasise biodiversity loss less.

Food labelling is another keyword that appears often in both published and unpublished policies: 248 times for the former and **273** for the latter. In unpublished policies, a related term, **consumer information**, also appears regularly (**120**), as it does in published policies (75 times).

2. Emphases unique to unpublished policies: food waste, food systems, pesticides

Food waste, **food systems**, and **pesticides** appear far more frequently in unpublished policies than in published ones. **Food waste** is the third most used keyword in unpublished policies, appearing **251 times**, whereas in published policies it appears only 17 times. This difference is largely due to an [unpublished proposal on food and textile waste](#). The keyword **pesticides** appears **97 times** in unpublished policies, compared to 55 times in published policies. These appearances are mainly divided between two unpublished policies: one proposing a regulation on [sustainable plant protection products](#) (51 occurrences), and the rest from Farm to Fork (21 occurrences). **Food systems** appears a similar number of times (**102 times**), which is significantly larger than the 12 times that it appears in published policies. A third of these occurrences come from Farm to Fork (32 occurrences), with the remainder mostly divided among two policies: [a vision for agriculture and food](#) (22), and the [EU waste directive](#) (15).

Although the greater use of these keywords among unpublished policies is concentrated in a few policies, these policies are broad, ambitious, and help to set the general direction (e.g., overarching vision, strategy, etc.) for policy goals in this period. A more detailed discussion of these policies can be found in Section 4 below.

3.2.3 Summary

As in published policies, environmental concerns and food labelling are the primary concerns of unpublished policies on sustainable food. The two groups of policies differ, however, in unpublished policies place markedly greater emphasis on food waste, food systems, and pesticides.

With regard to gaps, unpublished and published policies share three: 1) the “ethical” gap; 2) the near absence of keywords related to health; and 3) the infrequent use of most keywords related to consumers. **Ethical food consumption** and **ethical food production** make even fewer appearances in unpublished policies compared to published ones. Yet, as in published policies, the frequent appearance of the related term **fair trade** (**78 occurrences**) and the presence of unpublished policies addressing related topics suggests that the word “ethical” is not the preferred term (or may even be consciously avoided) in these discussions.

Keywords related to health appear rarely in unpublished policies, as they do in their published counterparts (with the exception of **meat**, which appears frequently in published policies as discussed above). These keywords include: **non-communicable disease** (**0**), **plant-based** (**1**), **ultra processed**

foods (3), and **meat (9)**. **Healthy diets** appears **17 times**, which is almost entirely attributable to Farm to Fork.

The gaps in published policies represented by keyword usage relating to consumers are partially addressed by unpublished policies. Apart from **food labelling** and **consumer information**, which are frequently used in both unpublished and published policies as discussed above, most gaps in keywords related to consumers are shared. Unpublished policies feature more instances of **consumer trust (75)**, **consumer behaviour (35)**, and **greenwashing (34)** than do published policies, but the remaining keywords in this group represent shared gaps: **food culture (0)**, **food democracy (0)**, **food environment (4)**, **food consumption patterns**, **food choice (4)**, and **ethical food consumption (4)**.

Keywords related to value chains generally appear more frequently in unpublished policies compared to published ones. These include **food waste**, **food systems**, and **pesticides**, as discussed above. **Food security (42 occurrences)** and **food value chains (30 occurrences)** can also be added to this list, although the frequencies are lower. Gaps remain in the use of **food sovereignty (8)** and **short supply chains (15)**, and have even grown in the use of **small-scale producers (11 occurrences)** compared to 44 in published policies).

A more detailed discussion of these gaps appears in Sections 5 and 6 of this report.

4. Policy frameworks mapping

While the policy mapping focuses primarily on legislative acts, it is equally important to examine the broader **policy frameworks** within which these instruments are situated. These are understood as strategic and programmatic instruments that define the overall direction of EU action in a given policy area. These frameworks typically take the form of strategies, action plans, communications, roadmaps, or long-term visions adopted by the European Commission or endorsed by EU institutions. Although they are not legally binding in themselves, they perform an important governance function, articulating political priorities, and shaping the direction and coherence of subsequent legislative and non-legislative measures. In addition, where relevant, the analysis goes beyond the level of general orientations to examine specific legislative initiatives announced or foreshadowed within these frameworks, allowing the mapping to capture how strategic priorities translate into concrete regulatory proposals.

The policy frameworks analysed in this report were identified through a screening of EU level policy outputs relevant to food systems, sustainability, and consumer policy during the period 2014-2025. On the one hand, the analysis focused on identifying dominant policy contexts within each framework and assessing how these align with the rationales underpinning the established codes as used for the key words analysis above. On the other hand, the assessment also considered how frameworks framed or prepared the ground for subsequent legislative proposals, ensuring that the analysis reflects not only discursive priorities but also emerging regulatory trajectories. To ensure analytical consistency, framework analysis drew on primary institutional sources, including Commission Communications, Impact Assessments and Staff Working Documents, relevant Council Conclusions and European Parliament reports, complemented by stakeholder position papers and EU news media articles. These sources were selected because they represent the principal arenas in which EU policy frameworks are formulated, justified, negotiated, and interpreted. Institutional documents provide authoritative accounts of policy objectives, problem definitions, legal and political rationales, and intended policy pathways. Impact Assessments and Staff Working Documents offer insight into the evidence base, policy options considered, and underlying intervention logics that may not be fully visible in high-level strategy documents.

Stakeholder position papers and EU news media were included to capture how these frameworks are received, framed, and contested beyond the institutions, whenever possible, and to reflect the broader policy debate surrounding their development and implementation. The selection was guided by relevance to the policy area under study, temporal proximity to the adoption of the frameworks, and their role in shaping or interpreting subsequent policy processes. This combination of sources allowed the analysis to triangulate between formal policy intent, technical justification, and political or societal interpretation. As a result, the analysis captures not only stated objectives, but also how policy frameworks function in practice as governance instruments embedded in wider policy dynamics.

The frameworks are analysed following a chronological structure aligned with successive European Parliament legislatures ([President Juncker's Political guideline 2014–2019](#), [President von der Leyen's Political Guidelines 2019–2024](#) and [President von der Leyen's Political guidelines 2024–2029](#)). The time

periods used in this policy mapping were selected for practical and analytical reasons. The first period (2014–2019) corresponds to a full European Commission legislative cycle and was chosen to ensure a manageable set of policy instruments for analysis. The same time frame was applied during the initial retrieval of policies in the first stage of the research, ensuring consistency across data collection. Although partly pragmatic, this period was selected to provide a baseline prior to the launch of the CUES project in 2022. The two subsequent periods align with the project timeline, making it easier to track policy developments and changes in governance approaches over time.

Frameworks were selected as focal cases where they met three cumulative criteria. First, they needed to have a systemic scope, addressing food systems or sustainable consumption across multiple stages of the value chain rather than focusing on a single sector or policy instrument. Second, they had to be directly relevant to the governance dimensions captured by the coding framework (**Codes 2–6**), in particular by shaping how sustainability objectives are translated into consumer information, food environments, production practices, monitoring or enforcement mechanisms. Third, priority was given to frameworks that explicitly positioned consumption or consumers within sustainability transitions, either by articulating expectations of behavioural change, by proposing consumer-facing instruments, or by influencing the settings in which food choices are made.

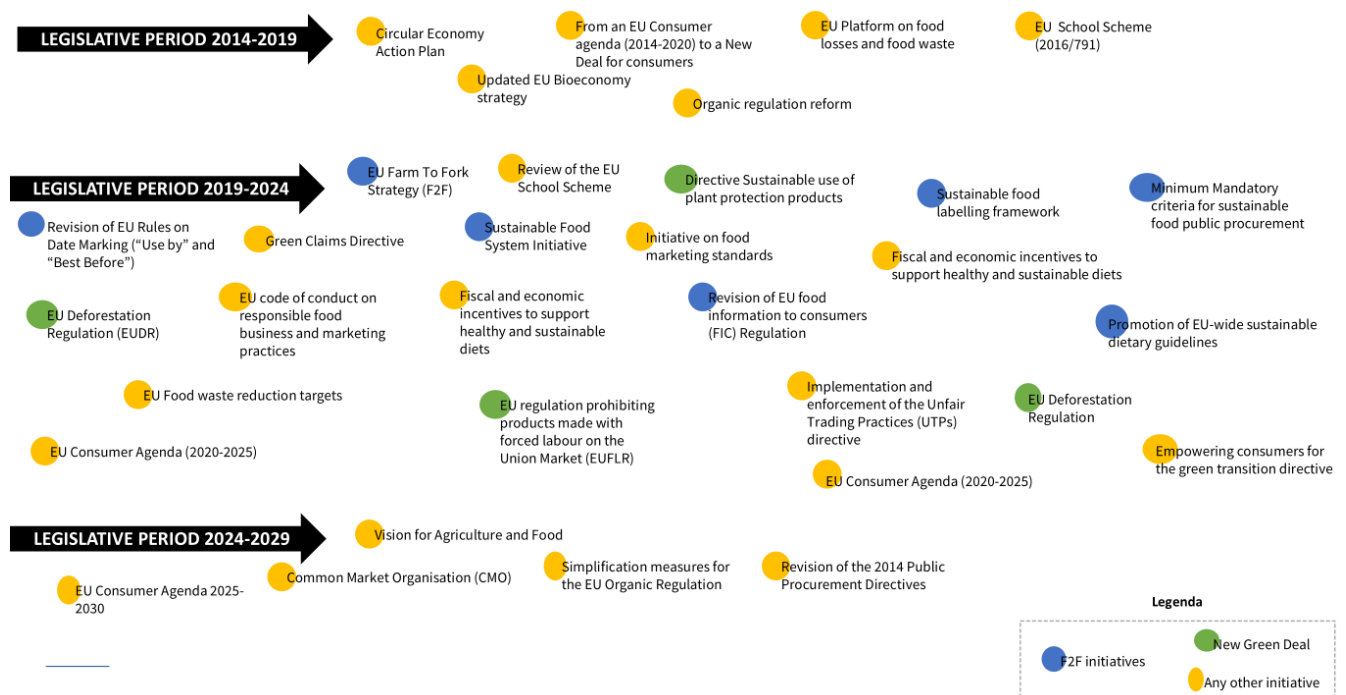
Frameworks meeting these criteria were treated as analytical anchors because they structure subsequent legislative initiatives, recur across Commission Work Programmes, and provide a reference point against which both policy ambition and subsequent gaps can be assessed.

This approach allowed to trace shifts in priorities, ambition and framing over time. A key starting point for mapping the frameworks are the [Political guidelines of the Commission President](#) for each legislature (2014-2019, 2019-2024, 2024-2029), which set out the overarching priorities and strategic direction for the Commission’s mandate. These high-level priorities form the basis for specific policy frameworks, such as strategies, action plans, communications, roadmaps, and long-term visions, — which are then developed and announced. To track how these frameworks translate into concrete initiatives, the analysis drew on the European Commission’s annual Work Programmes, published each year to outline planned legislative and non-legislative actions. Annual work programmes were reviewed alongside other institutional documents (Commission Communications, Impact Assessments, Council Conclusions, European Parliament reports) to capture both strategic objectives and the specific policy proposals they generate over time. This approach provides a structured chain from political priorities to frameworks and then to concrete policy measures.

Finally, the framework analysis revealed that some EU initiatives influence food related behaviour not through consumer information or claims, but by intervening directly in the settings in which food choices are made. To capture this dimension, the additional code **Food environment** was introduced. This code covers policies that act on the physical, institutional or social contexts of food consumption, thereby shaping availability, accessibility, affordability and default choices. Rather than relying on individual consumer decision making, these measures influence behaviour by modifying the environments in which food choices are made, such as schools, workplaces, public procurement, retail spaces or catering settings.

Figure 1 shows a timeline of European Union food consumption related policy initiatives organised by legislative period (2014–2019, 2019–2024, and 2024–2029). Individual initiatives are displayed as labelled circles positioned within each legislative period and are colour-coded according to their classification: Farm to Fork initiatives, European Green Deal initiatives, and other related EU initiatives. The figure includes policies covering areas such as food systems, consumer information, agricultural regulation, sustainability, and public procurement, and provides a chronological overview of initiatives adopted or proposed across successive EU legislative terms.

Figure 1: Timeline of European Union food consumption policy initiatives



4.1 Legislative period 2014-2019

4.1.1 Circular Economy Action Plan

In late 2014, the Juncker-led European Commission withdrew the previous Commission’s 2014 Circular Economy package. The latter was prepared under the Barroso Commission which had focused primarily on waste legislation and recycling targets. Although politically controversial, the withdrawal was justified under the “Better Regulation” agenda, a reform drive aimed at simplifying EU legislation, reducing regulatory burdens, and strengthening the use of impact assessments and economic competitiveness criteria in policymaking.

The Commission Communication “[Closing the loop, an EU action plan for the Circular Economy](#)” (COM(2015) 614 final) (CEAP) was adopted on **2 December 2015**. The text promoted a value chain approach spanning production, consumption and disposal. By treating waste, packaging and resource efficiency as interconnected, the CEAP normalised the use of information, marketing rules and behavioural interventions as legitimate regulatory tools shaping consumer choices, rather than as purely voluntary measures.

Alongside the CEAP, the European Commission tabled [four waste-law proposals](#), also known as the “waste package”. Negotiations centred on the scope of waste prevention as well as the balance between binding rules and guidance. The package was adopted in 2018 and was widely described by the Parliament as [central to the EU’s shift towards a circular economy](#), because it introduced binding targets for recycling and waste reduction, promoted waste prevention measures, and harmonised rules across Member States, thereby creating the legal foundation for a systemic transition from disposal oriented waste management to resource efficient circular practices.

Stakeholder reactions were mixed. NGOs, as reported by [Euractiv](#), criticised the withdrawal of the earlier package and called for stronger justification, while [Zero Waste Europe](#) argued that the revised package weakened prevention measures and omitted binding targets on food waste and marine litter. [BEUC](#), the European Consumers Organisation, welcomed the circular economy agenda for its potential consumer benefits, particularly in terms of product durability and repair, but called for stronger consumer-oriented design requirements and rights.

CEAP is best coded under **Code 3 Food labelling and information to consumers**, even though it is not itself a labelling instrument. The CEAP’s significance lies in how it reframed waste, packaging, and resource efficiency as interconnected elements.

4.1.2 EU Platform on food losses and food waste

In **2016**, the European Commission established the [EU Platform on food losses and food waste](#) as a multi-actor governance mechanism supporting progress toward SDG 12.3 “food waste reduction”. Through this initiative, the EU convened stakeholders and developed guidance, exchange of practices, and shared measurement approaches. The platform launched its [first meeting in 2016](#) bringing together EU institutions, Member States, industry, NGOs, and other actors. During its first mandate (2016–2021), it focused on structuring the policy field through thematic subgroups and practical outputs, with its main achievements later documented in Commission and sectoral summaries, reflecting its role as an early coordinating and knowledge-building mechanism.

Environmental organisations such as [Feedback Global](#) explicitly welcomed the creation of the Platform and argued for strengthening measurement scope (i.e. pushing to cover losses earlier in the supply chain).

The Platform is an initiative that best corresponds to **Code 4 monitoring**. While the Platform also served coordination and agenda-setting functions, its concrete outputs focused heavily on developing shared measurement approaches, improving data comparability, and structuring how food losses and food waste are defined and tracked across the EU.

4.1.3 From an EU Consumer agenda (2014-2020) to a new deal for consumers

The [EU Consumer Agenda 2014–2020](#) served as the strategic framework for EU consumer policy during the 2014–2019 legislature. It set priorities for consumer safety, trust and knowledge, stronger enforcement, and the modernisation of consumer law in response to cross-border and digital market developments.

Negotiation and debate around the Agenda focused less on expanding consumer rights and more on strengthening enforcement mechanisms and deterrence. Member States broadly supported the objectives of consumer protection, but expressed concerns regarding subsidiarity and proportionality, particularly where stronger EU-level coordination or harmonised sanctions were envisaged.

In the aftermath of its publication, the [European Commission repeatedly identified weak and uneven enforcement of consumer rules](#) across Member States, particularly in cross-border cases, as a central problem, with national authorities lacking effective tools to tackle EU-wide infringements. At the same time, rapid [digitalisation](#) exposed gaps in consumer law, as online marketplaces, ranking and review systems as well as, personalised pricing created new challenges. These pressures were amplified by [high-profile mass-harm cases](#) i.e. widespread Dieselgate emissions scandal discussed in Commission impact assessments as illustrative of consumer detriment in enforcement and redress), frequently referenced in Commission impact assessments and parliamentary debates, which underscored the limited deterrent effect of existing sanctions and the absence of effective collective remedies.

These tensions became more visible in the lead up to the [New Deal for Consumers package](#) proposed in 2018, which represented the most concrete legislative outcome associated with the Agenda. [Member States and industry groups](#) raised concerns about aspects of enforcement and penalties, such as the proposal for harmonised fines tied to trader turnover, with some arguing that such measures could impose disproportionate burdens on national systems and businesses. [Consumer advocacy groups](#) welcomed key elements of it but also registered pushback on scope and detail. For example, BEUC explicitly supported stronger sanctions and collective compensation tools but cautioned that the Commission's approach was too limited and procedural hurdles could blunt effectiveness.

The agenda falls squarely under **Code 3 Food labelling and information to consumers**. Indeed, the EU Consumer Agenda 2014–2020 explicitly targets the quality, reliability and enforcement of information provided to consumers, which is the core concern of Code 3. Indeed, one of its central priorities was to ensure that consumers receive clear, truthful and comparable information, particularly in cross-border

and digital markets. This includes information conveyed through product descriptions, marketing claims, rankings, reviews and commercial communications.

4.1.4 Updated EU Bioeconomy strategy

On 11 October **2018**, the Commission issued the updated Bioeconomy strategy, “[A sustainable Bioeconomy for Europe](#)” (COM(2018) 673 final), revising the EU framework for the use of renewable biological resources and explicitly linking the bioeconomy to decarbonisation, circularity and sustainable food system objectives. The strategy focused on scaling up bio-based solutions through EU funding, supporting local bio economies, and improving understanding of ecological limits via better monitoring. The new EU approach was endorsed by [Council](#) conclusions adopted on 29 November **2019**.

Implementation of the 2018 Bioeconomy Strategy was uneven. [Commission reporting](#) highlighted progress in coordination and agenda setting, including the uptake of national strategies, expanded EU funded research, and the creation of the [Joint Research Centre Bioeconomy Monitoring System](#). At the same time, [Commission and external analyses](#) criticised the strategy’s reliance on voluntary measures and soft coordination, noting the absence of binding safeguards or limits on biomass use and warning of risks to land, biodiversity and ecosystems.

The strategy falls under **Code 5. Promotion of agroecological practices, including research initiatives**. Indeed, the strategy emphasised scaling up bio-based solutions, supporting innovation through EU research funding, and promoting sustainable resource use across agriculture, forestry, fisheries, and food systems.

4.1.5 Organic regulation reform

The reform of the EU organic framework began with a [Commission proposal in 2014](#) and followed a prolonged legislative process, culminating in a political agreement in June 2017 and the [adoption of Regulation \(EU\) 2018/848](#) by the European Parliament and the Council in 2018. Framed by the Parliament as a measure to strengthen consumer trust in organic food, the Regulation repealed the 2007 legal framework and entered into force in January 2022 (delayed to account for challenges presented with the COVID-19 pandemic). It established harmonised EU wide rules for organic production, processing, labelling, certification, control systems and trade, and introduced mechanisms such as group certification to facilitate market access for smaller producers while ensuring consistent standards across Member States. Its implementation has been supported by [delegated and implementing acts refining control and compliance mechanisms](#).

The regulation primarily aligns with **Code 3 Food labelling and information to consumers**, as its core function is to define how organic production is regulated and how the EU organic logo may be used, through harmonised EU-wide standards, controls and certification systems. It has a secondary link to

Code 5 Promotion of agroecological practices, insofar as the regulatory structure shapes the conditions under which organic production operates.

4.1.6 EU School Scheme (2016/791)

Adopted in May **2016**, [Regulation \(EU\) 2016/791](#) merged the EU School Fruit and School Milk Schemes into a single EU School Scheme aimed at promoting healthier eating habits among children through food distribution and education. The reform stemmed from a [2014 EC proposal](#) and was negotiated over roughly two years between the EU institutions.

Negotiations reflected political disagreements over budget allocation, EU steering versus Member State flexibility, and the binding nature of educational measures. On the one hand, the European Parliament pushed for a [stronger educational and health focus](#), while on the other [several Member States emphasised subsidiarity](#), resulting in a compromise that reinforced education, but left wide scope for national discretion.

Although the Scheme has expanded access to fruit, vegetables, milk and nutrition education, [Commission monitoring](#) indicated uneven implementation and limited evidence of lasting behavioural change. [The European Parliamentary Research Service](#) has pointed to variation in delivery, limited coverage in some regions, and weak evaluation of long-term impacts. It further noted that monitoring and evaluation focused mainly on outputs (such as quantities distributed or numbers of participating schools) rather than outcomes.

This scheme falls under **Code 6 Food environment**, as the scheme intervenes not by persuading consumers through information or claims, but by structuring the material and institutional context in which food choices are made.

Figure 2: Distribution of EU food-related policy instruments by governance code, 2014-2019

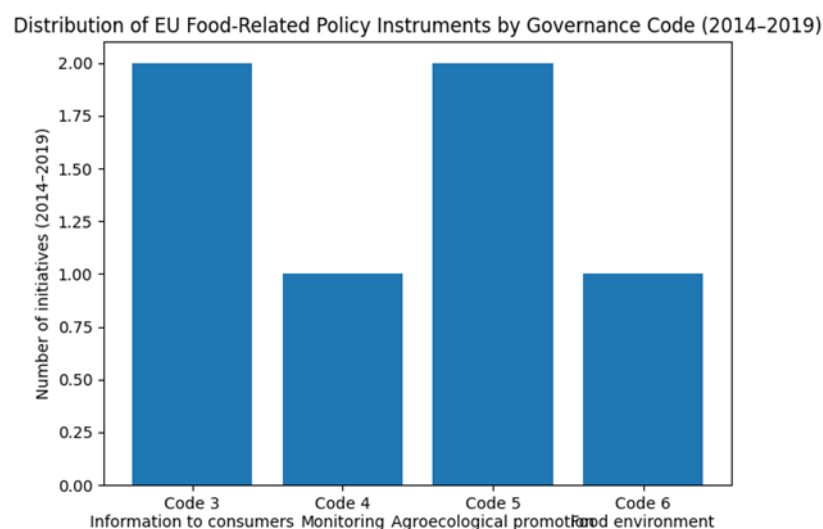


Figure 2 illustrates the distribution of EU food consumption related policy instruments adopted during the 2014–2019 legislature across identified CUES codes. The figure shows a clear concentration of initiatives under Code 3 (information to consumers) and Code 5 (promotion of agroecological practices and research), reflecting the Juncker Commission’s preference for informational, market-shaping and innovation-oriented governance rather than direct regulatory intervention in consumption or production. Monitoring-based instruments (Code 4) and food environment interventions (Code 6) appear less frequently, indicating a more limited reliance on data infrastructure and structural choice shaping measures. Overall, the distribution suggests a policy mix characterised by soft steering, transparency and knowledge-based coordination, with comparatively fewer interventions that directly restructure food environments or impose binding behavioural constraints. This pattern is consistent with the Commission’s “Better Regulation” agenda and its emphasis on subsidiarity, competitiveness and stakeholder acceptance during the period under study.

4.2 Legislative period 2019-2024

4.2.1 EU Farm to Fork Strategy (F2F)

The EU’s [Farm to Fork \(F2F\) Strategy](#) was announced in December **2019** as part of the [European Green Deal](#) and formally published in May **2020**. It positioned food systems at the centre of the EU’s sustainability transition, addressing environmental, climate and public health challenges across the entire food value chain, from production to consumption and waste. The Strategy set out measures to reduce emissions, pesticide and fertiliser use and food waste, while promoting healthy, safe and affordable food. Alongside environmental and health goals, F2F aimed to support fairer economic conditions for farmers and food businesses. The strategy was accompanied by an [Action Plan of 27 legislative and non-legislative measures](#) to be implemented between 2020 and 2024, covering agricultural production, food processing, retail, consumption, and waste.

On the consumption side, F2F included initiatives on food labelling, public procurement, dietary guidance, food waste, marketing practices, and fairness in the food chain, all of which would shape how consumers engage with healthier and more sustainable food. While some measures have been adopted, others remain delayed or abandoned, revealing gaps between policy ambition and implementation.

This falls primarily under **Code 5 Promotion of agroecological practices, including research initiatives**, while also intersecting with **Codes 3 Food labelling, 4 Monitoring and 6 Food environment**. Indeed, F2F is mainly concerned with steering systemic change in food production and supply chains, notably through targets and policy orientations on pesticide reduction, fertiliser use, organic farming expansion, etc. Similarly, the strategy explicitly integrates complementary consumer facing and governance instruments, including **commitments on food labelling and information (Code 3)**, the **establishment of targets and indicators for food waste and sustainability performance (Code 4)**, and actions aimed at reshaping **food environments through public procurement, school food schemes, and dietary guidance (Code 6)**.

Below, researchers provide a review of initiatives pertaining to the Farm to Fork Strategy.

4.2.2 Sustainable Food System Initiative

The [Sustainable Food Systems Initiative \(SFS\)](#) was announced in **May 2020** in the F2F as a horizontal framework to align EU food policy with sustainability goals. The Commission confirmed this intent in 2020, launched an [impact assessment and public consultation](#) in 2022, and included a regulation on sustainable food systems in [its 2023 Work Programme](#). The consultation showed strong public support for EU action, including sustainability labelling and food composition targets.

As delays emerged in 2023, civil society criticised the absence of the promised proposal from the 2024 Work Programme. Organisations such as the [WWF](#) warned this risked fragmenting food policy and shifting responsibility onto consumers. Concerns over transparency led to a formal complaint and an inquiry by the [European Ombudsman](#) into the Commission's handling of the file.

Several factors explain why the Sustainable Food Systems Initiative stalled. First, it was perceived as highly ambitious and cross-cutting, covering sensitive areas such as diets, food composition, public procurement and labelling, [which directly affect consumer behaviour and national policy choices and therefore raise subsidiarity and competence concerns](#). As noted by the [European Parliamentary Research Service](#), such horizontal food initiatives encountered resistance in the Council, where several Member States raised concerns about subsidiarity, regulatory overreach and administrative burden in areas partly seen as national competences. This is reflected [in the Parliament's Legislative Train](#), where cross-cutting Farm to Fork files were repeatedly flagged as politically difficult due to **persistent inter-institutional disagreement, subsidiarity concerns and sectoral opposition**.

Second, the political context shifted from 2022 onwards following Russia's invasion of Ukraine, food and fertiliser market disruptions and sharp food price inflation. Food security, production capacity and farmer incomes moved to the forefront of EU priorities, reducing appetite for new comprehensive regulatory frameworks, with the Commission and Council explicitly [acknowledging these pressures](#).

Finally, key elements initially envisaged under the SFS, such as sustainability labelling, were progressively channelled into separate legislative files. This strategic reorientation was later formalised when the [Commissioner for Agriculture](#) announced the development of a "Vision for Agriculture and Food" as a more politically acceptable roadmap balancing sustainability and competitiveness presented in February 2025.

This falls primarily under **Code 6 Food environments**, as the SFS framework aimed to reshape the structural conditions of food production, provision and consumption. It also intersected with **Code 3 labelling and information to consumers and Code 4 Monitoring**.

4.2.3 Sustainable food labelling framework

The [Sustainable food labelling framework](#) announced under the F2F aimed to give consumers clear, harmonised information on the environmental and social sustainability of food products, including climate, biodiversity and animal welfare impacts. An inception impact assessment and a public consultation were published between [28 September and 26 October 2021](#), and the replies to it showed strong stakeholder interest. However, the framework was never proposed and published.

[Assessments of F2F implementation](#) show that many flagship measures have been delayed or abandoned due to stakeholder opposition, from multiple directions. In 2023–2024, agricultural unions and farming organisations across the EU staged sustained protests and tractor blockades against perceived burdens associated with Green Deal and food system reforms, arguing that proposed sustainability requirements would increase costs and threaten farm livelihoods and competitiveness. Although a cornerstone of the EU’s Green Deal, the strategy faced strong political and what has been characterised as broader “[farmer backlash](#)”. Indeed, evidence suggests it was disproportionately driven by well organised lobbying from incumbent agri-industrial interests. In particular, influential farm organisations such as [Copa-Cogeca](#), which primarily represent large landholders and industrialised farming systems, played a central role in mobilising resistance to key F2F measures. Civil society organisations such as [Corporate Europe Observatory](#) have documented how these actors leveraged privileged access to EU decision-making to dilute or block reforms perceived as threatening existing production models, pointing to dynamics of corporate and regulatory capture within EU agri-food governance. As a result, despite being a cornerstone of the EU Green Deal, only around half of the 31 actions announced under the strategy were ultimately delivered.

Although a cornerstone of the EU’s Green Deal, the strategy faced strong political and [protesting farmer backlash](#). Of the 31 actions announced, around half were not delivered.

This framework falls under **Code 3 Food labelling and information to consumers**. The sustainable food labelling framework was explicitly designed to harmonise and improve sustainability related information provided to consumers at the point of purchase.

4.2.4 Revision of EU food information to consumers (FIC) regulation

Closely linked to the sustainable food labelling framework was the planned [revision of the Food Information to Consumers \(FIC\) Regulation](#), which governs how food information is presented to EU consumers. The Regulation establishes the core principles for clear and accurate labelling to ensure a high level of consumer protection. Proposed review elements included harmonised mandatory front-of-pack nutrition labelling, nutrient profiles to limit health and nutrition claims on foods high in salt, sugar or fat, possible extensions of mandatory origin labelling, and revised date-marking rules to address consumer confusion and prevent unnecessary food waste.

The planned revision was preceded by extensive evidence gathering and consultation. An inception [impact assessment](#) was published in December 2020, followed by a [public consultation](#) in 2021 that attracted over 3200 stakeholder submissions.

Industry groups, including [FoodDrinkEurope](#) urged that any revision should avoid disproportionate burdens on companies, particularly SMEs, reflecting wider concerns about impacts on the internal market. [Public health advocates](#) report that industry resistance, notably to mandatory front-of-pack labelling such as Nutri-Score, has contributed to delays on the file.

Indeed, this revision was announced in **2020** but was not delivered. Further, in 2024, [Members of the European Parliament](#) explicitly asked the Commission why the proposal had not been published, without a reply being granted.

Civil society organisations, such as [Foodwatch](#), have publicly criticised the lack of transparency around the stalled proposal, pointing to repeated delays and rejected information. Foodwatch International has appealed to the European Ombudsman after the Commission refused to disclose documentation or a clear rationale for the delay. A [European Court of Auditors \(ECA\)](#) report noted that [national schemes](#) have emerged in the absence of EU action, reflecting political and technical difficulty in reaching agreement.

This revision falls under **Code 3 Food labelling and information to consumers** and also relates to **Code 2 Authorising or refusing health claims made on food**. The revision relates to how food information is presented to consumers, including front-of-pack nutrition labelling. Also, the introduction of nutrient profiles would directly affect the conditions under which health claims may be made, intersecting with Code 2.

4.2.5 Green Claims Directive

The European Commission's proposal for a [Green Claims Directive](#) was published in **March 2023**, in light of studies finding that more than half of green claims made by companies in the EU were vague or misleading, and 40% were completely unsubstantiated. It sought to address this by requiring that green claims be scientifically substantiated and independently verified before use. It wanted to create a consistent EU framework for credible environmental claims, without imposing a full life-cycle analysis for all claims. The proposal also set rules on how environmental claims and labels are communicated, requiring claims to reflect only verified impacts and introducing ex-ante verification by accredited bodies. It included provisions on private labelling schemes, exemptions for microenterprises, support for SMEs, and enforcement mechanisms.

The first trilogue negotiation between the European Commission, Council of the EU and European Parliament, was held on 28 January 2025 and the second on 24 April 2025. The negotiations focused on claims and labelling schemes, information to consumers and verification and access to justice and penalties. The third trialogue was scheduled for June 23 2025. In the week prior to the scheduled negotiation, however, the [European People's Party \(EPP\)](#), the largest political party in the EU Parliament,

issued a letter requesting that the Commission “reconsiders and ultimately withdraws” the directive, arguing that the new rules would be overly burdensome and complex, in contrast to ongoing efforts to simplify compliance burdens on companies. On 20 June 2025, the Commission [announced](#) that it intended to withdraw the proposal, stating that its proposed scope would cover micro-enterprises, creating what officials described as “very high administrative burden” for these firms. However, the initiative is still listed as “pending proposals” in the [European Commission work programme 2026](#).

Several [EU lawmakers](#) strongly criticised the Commission’s decision. MEP Anna Cavazzini, Parliament’s Chair of the Committee on Internal Market and Consumer Protection, and Antonio Decaro, Chair of the Committee on the Environment, Climate and Food Safety, said: “This modus operandi could set a dangerous precedent for the legislative process and institutional procedures, leading to unnecessary and avoidable confrontation among co-legislators”.

[Others](#) called into question the claim that the cancellation was due to the inclusion of microenterprises, pointing out that Parliament had already decided to remove microenterprises from the scope of the directive

The proposal mainly falls under **Code 3 Food labelling and information to consumers** as it focuses on how environmental and sustainability claims are communicated to consumers, aiming to ensure that labels and marketing statements are clear and not misleading. It also relates to **Code 4 Monitoring**, as verification and enforcement mechanisms are included to ensure compliance.

4.2.6 Empowering consumers for the green transition directive

On 27 March **2024**, the [EU’s Directive \(EU\) 2024/825 on empowering consumers for the green transition](#) entered into force. It amended the [Unfair Commercial Practices Directive \(UCPD\)](#) and the [Consumer Rights Directive](#) to strengthen consumer protection against misleading practices and support more sustainable and circular consumption.

Following a [Commission proposal](#) in March 2022, a political agreement in September 2023 and [adoption](#) in early **2024**, the Directive introduced harmonised point of sale information on durability, reparability and legal guarantees, banned generic or unsubstantiated green claims, restricted unverified sustainability labels, and addressed practices linked to early/planned obsolescence. Member States must transpose the Directive by 27 March 2026, with application from 27 September 2026.

CSOs reactions largely welcomed the Directive as a long-awaited step toward restoring trust in sustainability claims, particularly by addressing greenwashing and planned obsolescence. At the same time, organisations such as [the Fair Trade Advocacy Office \(FTAO\)](#) emphasised that improved consumer information alone cannot guarantee genuinely sustainable or fair products unless it is backed by stronger accountability and trading conditions throughout global supply chains. Environmental groups, including [ECOS](#), echoed this concern, supporting the crackdown on misleading labels while cautioning

that uneven oversight of certification schemes and limited enforcement capacity could weaken the Directive's practical impact.

The directive falls under **Code 3 Food labelling and information to consumers**. It shapes the informational conditions under which consumers encounter and assess claims related to durability, reparability, environmental performance, and ethical attributes of products, including food.

4.2.7 Minimum mandatory criteria for sustainable food public procurement

The F2F included an action to define minimum mandatory criteria for sustainable food public procurement in schools, hospitals and other public institutions, with the aim of promoting healthy and sustainable diets. Originally scheduled for **2023**, this initiative has not been published as a legislative proposal.

It was intended to go beyond existing [Green Public Procurement criteria](#) by introducing mandatory environmental, social and health criteria. The [EU Food Policy coalition](#) had suggested to the EU focusing on areas such as healthy food, support for small-scale farmers, climate action, Fair Trade, and animal welfare, amongst others. By shaping food environments in public settings, such criteria would significantly influence consumer exposure to sustainable food while encouraging fairer production practices and better remuneration for sustainable producers.

National and local authorities with strong sustainable procurement strategies (i.e. [Italy](#) and [France](#)) show that ambitious criteria can be effective, but harmonised EU requirements have not been put forward by the Commission.

The delay in adopting mandatory criteria for sustainable food public procurement largely reflects [legal and practical constraints](#). In particular, the absence of an agreed EU-level definition of “sustainable food” has complicated the design of binding criteria covering environmental, social and health objectives. Although the Farm to Fork Strategy envisaged a Sustainable Food Systems Framework to address this issue, delays in its adoption have left the necessary legal basis unresolved. In addition, sustainability remains difficult to operationalise in procurement practice, as existing criteria have focused primarily on environmental aspects, while social and health dimensions are less developed. Taken together, these legal and technical challenges have made the shift from voluntary to mandatory criteria complex and politically sensitive.

This initiative falls primarily under **Code 6 Food environments**, with links to **Code 5 Promotion of agroecological practices**. The mandatory criteria would reshape consumption patterns through availability and exposure rather than individual choice. This makes it a structural intervention in food environments. At the same time, by incentivising sustainable and agroecological production upstream, it also relates to **Code 5**.

4.2.8 Review of the EU School Scheme

Under the F2F, the Commission committed [to reviewing the EU School Scheme](#), the programme that supports distribution of fruit, vegetables, milk, and milk products to school children with the goal of refocusing it on healthy and sustainable food and education. The review was initially scheduled for **2023**, with the [“Have Your Say” Commission portal indicating that final adoption could be expected by Q4 2024](#). In parallel, the European Parliament’s [AGRI Committee](#) recognised the scheme’s potential to support Green Deal and F2F goals while highlighting limits in coverage.

Despite these preparatory steps, no formal legislative proposal emerged. On 18 July **2025**, the Commission instead published a new proposal on the EU School Scheme effectively signalling that the original review had been [abandoned](#) in favour of a fresh legislative text. The new proposal focused on restructuring the scheme’s aid mechanisms rather than the originally envisaged sustainability refocus.

The shift reflected the political and practical difficulty of integrating sustainability and dietary objectives into a long-standing agricultural aid scheme. Updating the School Scheme raised contentious questions about product scope and implementation, [including debates over the inclusion of plant based drinks, which exposed deep division](#). Parliament’s implementation reports also highlighted structural weaknesses, such as limited reach ([around 20% of pupils](#)) and uneven delivery across Member States, raising concerns about the feasibility of expanding the scheme’s objectives equitably.

This falls under **Code 6 Food environments**. The EU School Scheme influences dietary habits through the food environment rather than through information or marketing. The planned F2F review aimed to strengthen this role by better aligning with health and sustainability objectives.

4.2.9 Promotion of EU-wide sustainable dietary guidelines

Under the F2F, the Commission committed to encouraging Member States to integrate environmental sustainability into their [Food Based Dietary Guidelines](#) (FBDGs). This non legislative action aimed to promote healthier and more sustainable diets by reducing dietary environmental impacts and supporting a shift toward foods with lower climate and biodiversity footprints.

Since **2020**, the Commission has supported this goal through guidance and dialogue, but it remains non-binding, with Member States free to decide whether and how to update their dietary guidelines. Several countries, including Denmark and Germany, have incorporated sustainability elements such as [plant-rich diets, reduced meat consumption and food waste into their national guidance](#). The Commission and EU bodies such as the [JRC, EFSA and the Knowledge4Policy](#) have published evidence and comparisons on how sustainability is reflected in national dietary guidelines. No EU-wide sustainable dietary guideline has been adopted. Thus, the EU’s role has largely been facilitative.

This falls under **Code 6 Food environments**. By influencing what is considered an appropriate or “normal” diet across public institutions and educational settings, sustainable dietary guidelines contribute to the broader food environment for consumers understanding of eating sustainably.

4.2.10 Fiscal and economic incentives to support healthy and sustainable diets

Under the F2F, [the European Commission recognised fiscal incentives as an important but largely indirect tool](#) to support healthier and more sustainable diets. The Commission encouraged Member States to use measures such as VAT differentiation, subsidies and price incentives. Since **2020**, EU institutions have published analytical work on how price signals influence diets, but no binding EU framework has been introduced, and implementation remains uneven due to political sensitivities around food prices, equity concerns and sectoral resistance.

In November 2024, Members of the European Parliament (MEPs) raised a written question on how [tax policies could help reduce the cost gap between healthy foods and less healthy alternatives](#), explicitly referring to F2F objectives and asking whether the Commission had assessed such measures or planned EU action. While, no EU-wide fiscal framework exists, several Member States, including [Romania, Denmark, Finland, Hungary, France, the Netherlands and Belgium](#) have introduced taxation policy initiatives aimed at encouraging healthy eating (including taxes on unhealthy or processed foods and targeted incentives for fresh produce).

This falls primarily under **Code 6 Food environments**, with secondary links to **Code 5 promotion of agroecological practices**. Fiscal incentives shape food choices by altering prices and affordability, thereby changing the consumption environment rather than relying on information alone. While EU action remains indirect, the core mechanism is a structural demand-side intervention through price signals.

4.2.11 EU Food waste reduction targets

The Commission proposed binding EU food waste reduction targets in July 2023 through a [revision of the Waste Framework Directive](#). The proposal required Member States to cut food waste by 10% in processing and manufacturing and by 30% per capita in retail, food services and households by 2030, compared with a 2021–2023 baseline. In February **2025**, [the Parliament and Council reached a provisional agreement](#), marking the EU’s first legally binding national food waste targets, alongside measures on food donation and harmonised monitoring.

[The agreed targets were formally adopted by the European Parliament in September 2025](#), triggering entry into force of the amended Waste Framework Directive. Member States have up to 20 months to

transpose the rules, while the Commission will monitor progress and may propose more ambitious targets by 2035.

Civil society broadly welcomed the adoption of binding food waste targets, while criticising their limited ambition. [Zero Waste Europe](#) described the rules as a positive step for circularity, but argued that the agreed reductions fall short, particularly in manufacturing. [Too Good To Go](#) also welcomed the binding targets but warned that they were insufficient to meet Sustainable Development Goal 12.3 on Food loss and waste reduction and called for stronger action on prevention and redistribution across the supply chain.

This falls primarily under **Code 4 Monitoring**, as the policy relies on binding targets, harmonised measurement and ongoing EU oversight to track Member State progress. It has a secondary link to **Code 6 Food environments**, since the targets are expected to drive structural changes in retail, food services and household facing practices.

4.2.12 Revision of EU Rules on Date Marking (“Use by” and “Best Before”)

The F2F identified date marking (“use by” and “best before”) as a source of avoidable food waste and announced a review of EU rules to reduce consumer confusion. A [2018 Commission study](#) estimated that up to 10% of EU food waste is linked to misunderstandings of date labels. Following a roadmap and public consultation, the Commission initially planned a proposal to [revise the Food Information to Consumers \(FIC\) Regulation](#) by **2022–2023**.

Despite this, no formal legislative proposal has been submitted to date. Current EU action therefore focuses on improving understanding and guidance rather than changing the law for instance through the [EU platform on food losses and food waste](#) mentioned for the previous legislature.

This falls primarily under **Code 3 Food labelling and information to consumers**, as date marking is a consumer-facing labelling tool intended to improve understanding and reduce avoidable food waste. It has a secondary link to **Code 4 Monitoring** by consumer research and evidence to assess impacts, but the core intervention remains informational.

4.2.13 Sustainable Use of Pesticides (SUR)

Under the F2F, the Commission committed to reducing the use and risk of chemical pesticides by 50% by 2030, linking the goal to environmental protection, biodiversity and public health. In June 2022, it proposed [a Regulation on the Sustainable Use of Plant Protection Products](#), introducing binding national targets, stronger Integrated Pest Management requirements, restrictions in sensitive areas and enhanced monitoring.

Several Member States and industry actors signalled resistance with arguments centred on potential negative impacts on agricultural production, food availability and farmers' incomes. They invoked ongoing geopolitical disruption caused by [Russia's war in Ukraine](#) as a key justification for delaying or weakening pesticide reduction commitments. [Critics pushed for additional impact assessments and highlighted administrative burdens](#), using food security concerns to argue that binding reduction targets were too risky amid supply chain instability.

By late 2023, resistance culminated in [the European Parliament rejecting the amended SUR](#) in November 2023, effectively halting the proposal. In February **2024**, the [Commission withdrew it](#), citing the lack of political consensus amid farmer protests, economic pressures and food security concerns. Mainstream reporting at the time highlighted that the decision came amid [farmer protests, right-wing backlash against Green Deal measures, and broader anxieties about regulatory burden in the agricultural sector](#) which reinforced national caution toward ambitious EU-wide environmental legislation linked to agriculture.

Civil Society Organisations (CSOs) criticised the withdrawal as undermining F2F and delaying action on health and environmental risks. Organisations such as [PAN Europe](#) argued that pesticide reduction underpins consumer trust in sustainable diets by ensuring consistency between sustainability claims and production practices.

This falls primarily under **Code 5 Promotion of agroecological practices**, as the SUR aimed to reduce chemical inputs through binding targets and stronger Integrated Pest Management. It has a secondary link to **Code 4 Monitoring** via its reporting and tracking requirements.

4.2.14 Action plan for organic production

The [EU Action plan for organic production](#) was adopted in **2021** under the F2F Strategy, which set a target of 25% of EU agricultural land under organic farming by 2030. The plan aimed to support this transition and strengthen fairer food supply chains, but [faced criticism](#) for limited ambition and funding, as well as for weaknesses in CAP eco-schemes and difficulties in combining them with organic support. According to the most recent Commission and Eurostat data (2023–2024), organic farmland stands at around 10–11% of EU agricultural land. Progress continues, but at a [pace insufficient](#) to reach the 25% target without significant acceleration.

This falls primarily under **Code 5 Promotion of agroecological practices**, as the Plan supports organic conversion, market development to scale agroecological production.

4.2.15 EU code of conduct on responsible food business and marketing practices

Adopted in **2021**, [the EU Code of Conduct](#) set voluntary standards for responsible business practices in the food sector, including marketing and labelling. Developed through an initial [stakeholder discussion](#) led by DG SANTE in early 2021, it relied on voluntary commitments and self-reporting. While it included standards relevant to responsible marketing, labelling and the credibility of sustainability claims, these are embedded within a broader agenda covering healthy diets, climate neutrality, resource efficiency and sustainable sourcing.

This falls under **Code 3 Food labelling and information to consumers**, as the Code centres on voluntary commitments related to marketing, labelling and business communication. It has secondary links to **Code 4 Monitoring** through self-reporting and transparency requirements.

4.2.16 Initiative on food marketing standards

Complementing the Code of Conduct, the Commission signalled plans to revise marketing standards and food information rules to improve consumer understanding of sustainability and prevent misleading claims. A specific formal EU public consultation focused solely on marketing standards has not yet been published.

In practice, the initiative moved into the [EU “Better Regulation” pipeline](#) for agricultural products (inception impact assessment and [public consultation in 2021](#)), but it did not translate into a legislative proposal. Instead, the Commission proceeded through targeted product-specific updates, notably the [April 2023 proposal](#) revising marketing standards for selected products and the parallel revision of the “Breakfast directives,” both advancing in 2023–2024. In contrast, the planned revision of [fishery and aquaculture marketing standards](#) remains blocked. Overall, implementation has been narrowed to [sectoral updates](#), while a broader horizontal framework for sustainability-related marketing standards has not been delivered.

The initiative falls primarily under **Code 3 Food labelling and information to consumers**, as marketing standards and related directives aim to improve transparency on product composition and origin. It has a secondary link to **Code 4 Monitoring** through the inspection and enforcement mechanisms needed to ensure compliance.

4.2.17 Implementation and enforcement of the Unfair Trading Practices (UTPs) directive

The [EU Unfair Trading Practices Directive \(EU\) 2019/633](#) was adopted in 2019 to address power imbalances in the agri-food supply chain and was enforced in 2022. The Directive sits within the broader [Common Agricultural Policy and food governance context](#) that complements Farm to Fork's objectives of fair economic returns and resilient food systems. It establishes a minimum level of protection for suppliers in the agricultural and food supply chain against abuses by more powerful buyers. It prohibits a set of “blacklisted” practices, such as late payments for food products, last minute cancellations of perishable goods, unilateral contract changes, and commercial retaliation against suppliers. In response to Member State experience with enforcement and the identification of gaps, in December 2024, the Commission proposed a [regulation to strengthen cross-border enforcement of the UTP Directive](#) through cooperation among national authorities. The file advanced through 2025, with the Council and Parliament [agreeing a provisional deal](#) in November 2025 on mutual assistance, information sharing and coordinated enforcement, and the text now awaits formal adoption.

The FTAO and allied civil society groups have welcomed steps to strengthen implementation and enforcement of the UTP framework, but have also called for [clearer inclusion of non-EU suppliers in enforcement mechanisms and stronger protections against unfair practices](#), arguing that current definitions and scope risk excluding unfair practices involving non-EU parties and that enforcement gaps persist despite the Directive's intention to provide a minimum level of protection to agri-food suppliers.

This falls primarily under **Code 4 Monitoring**, as it focuses on enforcement, investigation and cross-border cooperation against unfair practices. It also has indirect relevance to **Code 6 Food environment**, since fairer trading conditions can influence market structure, supply stability and food pricing over time.

4.2.18 EU regulation on prohibiting products made with forced labour on the Union Market (EUFLR)

The ban on products made with forced labour gained momentum within broader EU efforts on ethical supply chains and human rights. The Commission [proposed a Regulation](#) on September 2022 to prohibit such products, responding to evidence of widespread forced labour in global value chains and gaps in existing EU enforcement powers.

The initiative built on repeated European Parliament resolutions like the [2022](#) one calling for a ban on products made with forced labour. A provisional agreement was reached in March 2024, with [formal adoption](#) by the Council in November 2024. Regulation (EU) 2024/3015 entered into force in December 2024 and will apply from December 2027. It prohibits placing on, exporting from or holding on the EU market any product made with forced labour, in line with [ILO definitions](#). Enforcement is risk-based, with national authorities investigating cases and the Commission leading where forced labour occurs outside the EU. Products found to involve forced labour must be withdrawn or banned from the EU market.

Civil society groups, including [Human Rights Watch](#), welcomed the Regulation as a major step toward supply chain reform, while stressing that strong enforcement and early corporate action are essential. Ahead of adoption, [NGOs and trade unions](#) urged EU legislators to ensure the Regulation was ambitious, enforceable and included meaningful accountability and remediation measures.

While there was no outright opposition to the forced labour ban, some Member States and industry groups raised concerns about implementation complexity, particularly for SMEs and global supply chains. Industry organisations, including [Business Europe](#) warned of administrative burdens and compliance costs, framing the debate around proportionality and legal certainty rather than rejecting the policy objective itself.

This falls under **Code 4 Monitoring**, as the Regulation relies on market surveillance and enforcement to block products made with forced labour, At the same time, it also links to **Code 3 Food labelling and information to consumers**, as consumers and civil society can submit substantiated concerns that may lead to investigations, and the objective is to keep products made with forced labour off the market. This measure thus supports **consumer protection** by safeguarding the market through regulatory oversight.

4.2.19 EU Deforestation Regulation (EUDR)

The [EU Deforestation Regulation \(EUDR\), Regulation \(EU\) 2023/1115](#) entered into force in June 2023 aimed at reducing the EU's contribution to deforestation, biodiversity loss and emissions. The objective was to strengthen transparency in agrifood supply chains by requiring due diligence to ensure that key commodities and derived products placed on the EU market are deforestation-free and legally produced. It replaced the EU Timber Regulation and expanded its scope beyond timber to major agricultural drivers of deforestation.

In December 2024, the [EU postponed the application date](#) by one year to 30 December 2025 for most operators, with a further grace period for SMEs. On 4 December 2025, Member States and Parliament agreed on further [targeted changes and simplification measures](#), and co-legislators tasked the Commission with a simplification review by April 2026 to assess administrative burdens. While its objectives enjoy broad support, implementation raised concerns over complex [traceability requirements](#), [IT readiness](#) and administrative burden. Exporting countries and their governments (i.e. Indonesia, Brazil) have criticised the EUDR [as burdensome and potentially exclusionary for small producers](#), seeking more flexible approaches and additional support for compliance.

In October 2025, a group of NGOs including [Fern](#) issued a joint letter denouncing the Commission's proposal to delay implementation, warning that such setbacks would have catastrophic consequences for forests, Indigenous Peoples and climate goals.

The regulation falls primarily under **Code 4 Monitoring**, as the EUDR relies on due diligence, traceability and compliance checks. It also links to **Code 5 Promotion of agroecological practices** by incentivising more sustainable production through market access conditions.

4.2.20 EU Consumer Agenda (2020-2025)

In **2020**, the Commission adopted the [New Consumer Agenda 2020–2025](#), linking consumer protection to the green and digital transitions. The agenda set out five priority areas: supporting consumers in the green transition, protecting consumers in the digital economy, effective enforcement and redress, addressing the specific needs of vulnerable consumers, and international cooperation. It prioritised support for consumers in the green transition, stronger enforcement and protection against greenwashing, recognising that existing consumer law tools were insufficient to address widespread and poorly regulated sustainability claims.

The Agenda draws on evidence and monitoring from the previous consumer-policy cycle (2014–2020), including Commission reporting and consumer surveys (e.g., the [Consumer conditions scoreboard 2019](#)) showing persistent enforcement gaps and low reliability of sustainability-related information. [Commission](#) and [consumer studies](#) revealed that many green claims were vague or rarely sanctioned, undermining consumer trust. Thus, the new strategy marked a shift from relying on ex post consumer redress to proactively shaping the information environment, prioritising credible and enforceable sustainability information over individual consumer responsibility.

Stakeholders broadly supported the Agenda’s enforcement focus but differed on implementation. [Consumer organisations](#), led by BEUC, welcomed the explicit recognition of greenwashing as a consumer protection problem and called for binding rules. By contrast, [business and industry](#) organisations broadly supported the objective of harmonisation but cautioned against overly prescriptive requirements and administrative burdens.

The agenda falls primarily under **Code 3 Food labelling and information to consumers**, with a secondary link to **Code 4 Monitoring** through its emphasis on enforcement and market surveillance.

Figure 3: Distribution of EU food-related policy instruments by governance code, 2019-2024

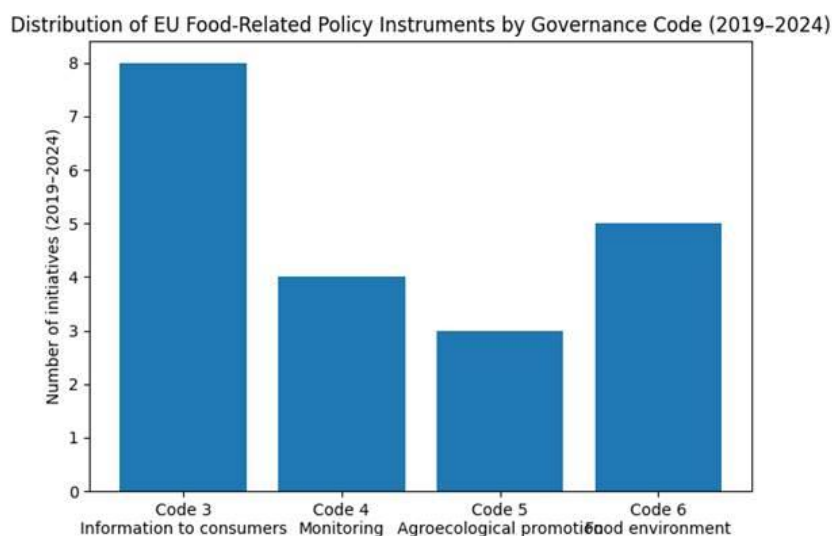


Figure 3 shows the distribution of EU food related policy instruments adopted between 2019 and 2024 across governance codes. Compared with the previous period, instruments based on information to consumers (Code 3) remain the most prevalent, indicating continued reliance on transparency, claims regulation and consumer facing measures. At the same time, the figure shows a relative increase in food environment interventions (Code 6) and monitoring based instruments (Code 4), reflecting greater attention to structural conditions shaping food choices and to data, measurement and enforcement capacities. Agroecological promotion and research-oriented measures (Code 5) remain present but less numerous. Overall, the distribution points to a more diversified governance mix than in the earlier period, while still prioritising information-based approaches.

4.3 Legislative period 2024-2029

The policy mapping for the 2024–2029 legislature reflects developments up to December 2025. Due to the timing of the present deliverable and the early stage of the legislative cycle, it was not possible to capture all initiatives announced or expected during this 5-year period. The analysis therefore focuses on proposals, frameworks and negotiations that were formally published, adopted or sufficiently advanced by the end of 2025.

4.3.1 EU Vision for Agriculture and Food

In September **2023**, the [Commission launched a strategic dialogue](#) on the future of agriculture involving 29 stakeholders from across the agri-food chain. Chaired by [Peter Strohschneider](#), the seven-month dialogue sought to [reduce polarisation and identify compromises](#) on farmer incomes, sustainability, competitiveness and innovation. The group’s joint report, published in September 2024, provided policy recommendations that fed directly into the [Vision for Agriculture and Food](#) which was published in February **2025** and set a long-term roadmap for agri-food systems to 2040. It was intended to replace the Farm to Fork Strategy as the main framework guiding future agri-food policy. With agriculture accounting for around 12% of EU greenhouse gas emissions and significant biodiversity impacts, the Vision positioned the next CAP reform as central to reconciling sustainability goals with the economic realities facing farmers. Alongside the Vision, the Commission established the [European Board on Agriculture and Food](#) to continue stakeholder dialogue. The initiative signalled a review of the Unfair Trading Practices framework to strengthen fairness and trust in supply chains, promoted a “best value” approach to public food procurement that prioritised sustainability and quality in public settings, and committed to enhanced transparency on prices and margins through the EU Agri-food Chain Observatory. The Vision also pointed to future action on food composition targets for salt, sugar and saturated fats, greater alignment of production standards for imported products, and stronger safeguards against misleading sustainability claims.

The Vision marked a shift away from Farm to Fork, placing greater emphasis on economic sustainability, resilience, competitiveness and simplification. It ruled out [reviving binding pesticide reduction targets](#), instead prioritising alternatives such as biopesticides, and signalled a tougher trade stance by [aligning import standards on pesticides and animal welfare](#). The text had a stronger focus on farming than on food consumption, with front-of-pack labelling dropped, limited action on advertising, and only selective proposals on public procurement and origin labelling.

Reactions to the Vision were mixed. [Copa-Cogeca welcomed](#) it as a “pragmatic reset”, but criticised the lack of clarity on future CAP funding, while [CEJA supported the approach](#), but found it insufficiently specific. [Via Campesina](#) and environmental NGOs, including [BirdLife Europe](#) and the [European Environmental Bureau](#) (EEB), argued the Vision lacked ambition and failed to address climate and biodiversity crises. Industry group [FoodDrinkEurope](#) also criticised its strong focus on farming at the expense of food businesses and consumers.

Civil society actors, including the [FTAO](#), consumer and environmental and health NGOs, welcomed elements such as stronger UTP enforcement and a focus on sustainable procurement, but criticised the Vision for prioritising competitiveness and CAP subsidies over binding market reforms, living incomes for farmers and meaningful consumer empowerment. They warned that, without enforceable mechanisms, consumers may continue to face opaque pricing, limited access to healthy and sustainable food, and weakly verified sustainability claims. CSOs also pointed to gaps in the Vision’s external dimension (i.e. the EU’s impact beyond its borders through trade, development and sustainability policies) and public health ambition and noted that consumers are largely absent from its framing, reinforcing a producer-centred approach that overlooks how market reforms could better support sustainable consumer choices.

The Vision for Agriculture and Food primarily shapes the production side of the food system by setting priorities for farming practices, innovation, resilience and CAP reform, placing it under **Code 5 Promotion of Agroecological practices**. It also fits with **Code 6 Food Environment** through initiatives on public procurement and origin labelling that may influence food availability in institutional settings.

4.3.2 Common Market Organisation (CMO)

The Common Market Organisation (CMO) is the legal framework governing EU agricultural markets under the Common Agricultural Policy, covering market stability, sectoral support, marketing standards and crisis measures. In July 2025, [the Commission proposed amendments](#) to the CMO Regulation (Regulation 1308/2013) to update the framework for the post-2027 CAP period, addressing priorities such as market resilience and food security. The proposal is currently under negotiation in the Parliament and Council as part of the 2028–2034 CAP package.

CSOs like [FTAO](#) welcomed the Commission’s focus on strengthening farmers’ position, particularly the proposal to regulate terms like “fair” and “equitable” to prevent misleading claims and support fair remuneration. However, it warns that vague EU definitions could enable “fair washing” and undermine higher ethical standards.

The CMO reform shapes how food markets function, influencing availability and pricing stability, which places it under **Code 6 Food Environment**. It also strengthens transparency and market oversight through monitoring and reporting tools, justifying a secondary link to **Code 4 Monitoring**.

4.3.3 Omnibus simplification packages

Omnibus packages group targeted amendments across multiple legislative files to reduce administrative burdens while formally preserving core policy objectives. In practice, they are being used to introduce adjustments to measures such as the EU Organic Regulation, the implementation timelines of the EU Deforestation Regulation, CAP rules and reporting requirements.

For the purposes of the CUES policy mapping, the analysis focuses specifically on the simplification measures related to the EU organic regulation, as this framework is directly linked to consumer-facing sustainability information and to the governance of organic labelling. Given the project's focus on consumers' understanding of sustainable eating, other elements of the omnibus packages that primarily affect production rules, compliance procedures or administrative timelines were considered less directly relevant and were therefore excluded from the mapping.

4.3.4 Simplification measures for the EU Organic Regulation

Experience with the implementation of Regulation (EU) 2018/848 since January 2022 has showed that control rules have created significant practical challenges, particularly for [smallholder producer organisations and operators in third countries](#).

CSOs, certification bodies and producer networks warned during 2023–2024 that compliance costs and legal complexity were becoming prohibitive, concerns confirmed by surveys coordinated by [Fairtrade International](#) indicating widespread difficulties in maintaining certification. [IFOAM Organics Europe](#) similarly cautioned that the new rules risked excluding producers and destabilising supply chains. These concerns were further echoed in the [Fit for Future Platform's recommendations](#) on the EU organic production and labelling framework, which called for simplification and better coordination to reduce administrative burdens and improve harmonised implementation? In response, and within the broader CAP simplification agenda, the Commission tabled a targeted [amendment to the Organic Regulation in December 2025 \(COM\(2025\) 780](#); presented as a narrowly scoped burden reduction package that preserved high standards while clarifying rules on certification, labelling, groups of operators and third-country equivalence. Sector stakeholders have broadly welcomed this approach, stressing that simplification must deliver legal certainty and inclusiveness without undermining consumer trust in the organic label.

The file is at the moment of drafting this report, with the European Parliament and the Council for negotiation.

The simplification falls under **Code 3 Food Labelling**, as the EU organic regulation (EUOR) fundamentally governs the conditions for using the EU organic logo and the credibility framework behind organic claims. It also connects to **Code 4 Monitoring**, since effective and feasible control mechanisms underpin trust in the scheme. A secondary link can be made to **Code 5 Promotion of agroecological practices**, as reducing disproportionate administrative barriers helps safeguard the viability of organic production.

4.3.5 Revision of the 2014 Public Procurement Directives

Since their adoption in 2014, the Public Procurement Directives (including Directive 2014/24/EU on public procurement, Directive 2014/25/EU on utilities and Directive 2014/23/EU on concessions) have been credited with increased transparency and broader participation in procurement markets. However, [evaluations](#) show they did not fully deliver on strategic objectives such as simplifying procedures, increasing procedural flexibility, and mainstreaming sustainability criteria.

The revision of the directives began in December 2024, when the European Commission launched a [call for evidence and public consultation](#) on the performance of the 2014 procurement directives to assess whether they remain fit for purpose and capable of delivering strategic socio-economic and sustainability objectives. The Commission published its [evaluation report and staff working document](#) in October 2025, confirming that while transparency and competition improvements have occurred, legal certainty, sustainability uptake and procedural flexibility are still limited. [Parliamentary activity](#) also reflects momentum as MEPs have been raising questions about the need for more flexible procurement rules with an OWN INI Report that was adopted in September 2025. A new [public consultation](#) has been announced by the European Commission with deadline for feedback on the 26 January 2026.

Public procurement shapes what food is served in schools, hospitals and other institutions, making it a clear **food environment** intervention **Code 6**. By integrating sustainability and quality criteria, it also creates demand-side incentives for **agroecological production, linking it to Code 5**.

4.3.6 EU Consumer Agenda 2025-2030

The [EU Consumer Agenda 2025-2030](#) is the European Commission's strategic framework guiding EU consumer policy over the next five years, aimed at strengthening consumer protection, enhancing competitiveness, promoting social fairness, and supporting sustainable growth across the Single Market. It built on the previous 2020-2025 agenda and was developed through extensive stakeholder consultations and an open public consultation in mid-2025. The agenda was formally adopted on 19 November **2025**, and it outlined four main priority areas: completing the Single Market for consumers by removing cross-border barriers; advancing digital fairness and online consumer protection; promoting sustainable consumption and combating greenwashing; ensuring effective enforcement and redress mechanisms against unsafe or non-compliant products and unfair practices. The agenda also

emphasised protection for vulnerable consumers and simplification for businesses, and its implementation will be monitored through ongoing cooperation with national authorities and stakeholders through to 2030.

While the Commission’s adopted Agenda reflects broad stakeholder input, some [CSOs](#) continue to press for deeper action in specific areas, including clearer sustainability information, and stricter action against manipulative “dark patterns” and fast-consumption business models or barriers to accessing basic financial services and fairness in digital financial products.

The EU Consumer Agenda (2025-2030) falls under **Code 3. Food labelling and information to consumers**, as it continues to structure the informal conditions under which consumers encounter sustainability-related claims, including those relevant to food products.

Figure 4: Distribution of EU food-related policy instruments by governance code, 2024-2029

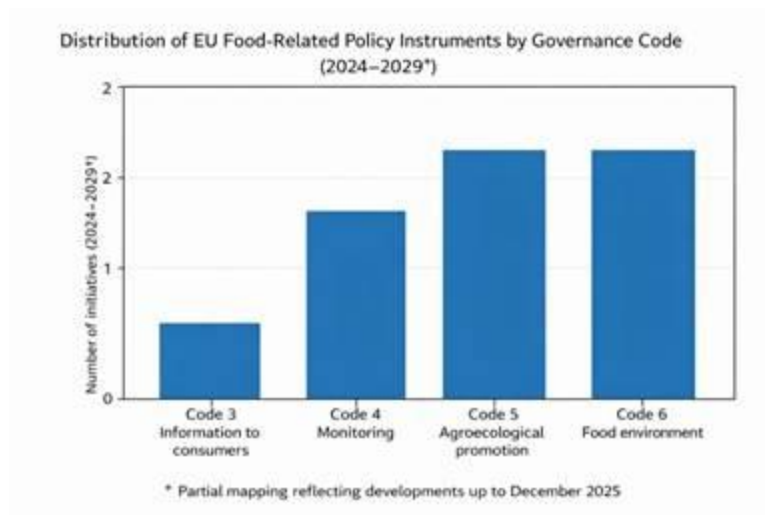


Figure 4. presents the distribution of EU food related policy instruments mapped for the period 2024–2029, based on developments up to December 2025. The figure shows a more limited number of initiatives overall, reflecting both the partial nature of the mapping and the early stage of the legislative cycle. Compared with earlier periods, information to consumers instruments (Code 3) are less prominent, while monitoring-based measures (Code 4) and food environment interventions (Code 6) feature more strongly. Agroecological promotion and research-oriented instruments (Code 5) also remain present, indicating continued attention to production side sustainability and innovation. Taken together, the distribution suggests a tentative shift away from consumer facing information measures towards structural, monitoring and implementation-focused governance, although conclusions remain provisional given the incomplete coverage of the period.

4.4 Policy framework analysis

Across the three legislatures, the frameworks move from “fixing the rules” to “steering transitions” and then to “rebalancing sustainability with competitiveness”.

In **2014–2019**, the dominant context is internal-market housekeeping. The Commission and co-legislators concentrate on enforcement gaps, cross-border problems, and the early frictions of digitalisation, while sustainability mostly enters through value chain framing (i.e. as articulated in the Circular Economy Action Plan (COM (2015) 614) and the establishment of the EU Platform on Food Losses and Food Waste).

The **Consumer Agenda 2014–2020** and the subsequent **New Deal for Consumers** illustrate this orientation clearly. These frameworks did not seek to redefine what consumers should eat or how food systems should be structured, but rather to ensure that existing rights were enforceable and that markets functioned more fairly. The emphasis was on tackling misleading practices, improving redress, and strengthening cooperation between national authorities.

Crucially, these initiatives encountered relatively limited political resistance. They were framed as technical and corrective: closing loopholes, updating outdated rules, and aligning enforcement tools with cross-border realities. They relied on well-established legal bases in consumer law and did not impose new substantive obligations on how food should be produced, marketed, or priced. Member State discretion was preserved, particularly in sanctions and enforcement design, and short-term economic impacts on powerful agri-food sectors were minimal. As a result, broad institutional consensus was possible.

Within this framework logic, the consumer is constructed primarily as a market actor who needs protection after harm occurs, or clearer information to avoid deception. The consumer needs clearer rules and fairer markets (through stronger enforcement, fewer misleading practices, better coordination), which naturally aligns with **Code 3** Food labelling and information to consumer and **Code 4** Monitoring, while production change shows up more cautiously through sectoral frameworks (notably the 2018 Bioeconomy Strategy and the Organic Regulation reform (Regulation (EU) 2018/848) aligning with **Code 5** Promotion of agroecological practices, including research. This is also the period where many files advance with relatively limited pushback precisely because they look corrective rather than redistributive and/or transformative: they update existing legal bases, keep room for Member State discretion, and avoid directly confronting volumes, prices, or dietary patterns.

The **2019–2024** legislature marks a clear rupture in framing. With the **European Green Deal** and **Farm to Fork Strategy**, food systems are no longer treated as a peripheral regulatory domain but as a central pillar of the EU’s sustainability transition. This shift profoundly alters both the role assigned to consumers and the political dynamics surrounding food related frameworks.

Empowering consumers to make sustainable choices becomes a stated policy objective, not merely a side effect of market transparency. This is visible in the planned **Sustainable Food Systems framework**,

and the expansion of initiatives on labelling, green claims, public procurement, and food waste. The consumer is no longer only protected **in markets** but is increasingly positioned as a **lever for system change** (including the Green Claims Directive proposal (2023), the Empowering Consumers for the Green Transition Directive (EU) 2024/825, the planned Sustainable Food Labelling Framework, and the proposal for binding EU food waste reduction targets under the Waste Framework Directive revision). That expands the policy repertoire: **Code 3** remains central, but **Code 6** Food environment gains traction as policies begin to target the settings in which choices are made (for example through the review of the EU School Scheme and the planned minimum mandatory criteria for sustainable food public procurement under Farm to Fork) rather than focusing only on the information displayed on products.

At the same time, **Code 4 Monitoring** gains strategic importance. As ambitions rise, so does the reliance on evidence, indicators, targets, and enforcement capacity. Monitoring becomes the governance mechanism that allows the Commission to justify action while navigating political sensitivity. Binding food waste targets, observatories, and reporting obligations exemplify this trend (including the EU Agri-food Chain Observatory and strengthened enforcement of the Unfair Trading Practices Directive (EU) 2019/633). However, this period also reveals the limits of consensus. Frameworks that remained close to information, monitoring, or incremental standards, such as strengthened enforcement progressed relatively smoothly. By contrast, initiatives that implied redistribution of costs or constraints on production models (notably the Sustainable Use of Pesticides Regulation (SUR) proposal and elements of the Sustainable Food Systems Initiative that were not tabled) encountered strong resistance. These files triggered competitiveness narratives, farmer income concerns, and subsidiarity arguments, particularly in the Council.

This divergence explains why some Farm to Fork commitments advanced while others stalled or were withdrawn. The consumer's role, while rhetorically elevated, became politically contested: once consumer empowerment implied changes upstream in production or downstream in diets, opposition intensified. In analytical terms, the tension emerges between **Code 3 and 4 instruments**, which were seen as legitimate market governance, and **Code 5 and 6 interventions**, which touched the political economy of food.

The **early phase of the 2024–2029** legislature, following the 2024 European elections, is characterised by a recalibration rather than a reversal of sustainability objectives. Inflation, geopolitical instability, farmer protests, and growing concern about regulatory burden reshape the framework discourse. Sustainability remains present, but it is increasingly filtered through lenses of competitiveness, simplification, and implementation capacity.

This shift is clearly reflected in the **Vision for Agriculture and Food** and the turn toward omnibus simplification packages (including proposed amendments affecting the Organic Regulation and adjustments to the implementation timeline of the EU Deforestation Regulation (EU) 2023/1115). Frameworks are less likely to announce new horizontal obligations and more likely to focus on refining, enforcing, or rationalising existing rules. **Code 4** Monitoring again becomes the least contested pathway for EU action, while **Code 3** Labelling and consumer information is retained as a tool for maintaining consumer trust without reopening production battles.

The role of the consumer also evolves. Consumers are no longer foregrounded as drivers of systemic change, but rather as beneficiaries of trust, fairness and transparency. Initiatives on unfair trading practices and procurement framed as “best value” (such as the reopening of the Unfair Trading Practices framework and the revision of the Public Procurement Directives) speak to consumer confidence rather than behavioural transformation. Most notably, the Vision does not mention consumers directly and focuses on production rather than on food. **Code 6 food environment** appears selectively, often justified in terms of efficiency or fairness rather than sustainability per se.

The new cycle rewards frameworks that can be presented as de-bureaucratising, enforcement-improving, or market-clarifying (**Code 4 and Code 3**), as illustrated by the emphasis in the Vision for Agriculture and Food on simplification, the reopening of the Unfair Trading Practices (UTP) framework, the revision of the Public Procurement Directives, and omnibus simplification packages affecting instruments such as the Organic Regulation and the EU Deforestation Regulation (EUDR), whereas more transformative packages that would reallocate costs along the chain or constrain production choices (such as the Sustainable Use of Pesticides Regulation (SUR), the non-adopted Sustainable Food Systems Framework, or binding sustainable food labelling proposals announced under Farm to Fork) based on health and/or sustainable grounds, remain the most exposed to blockage.

At the same time, more transformative ambitions, particularly those associated with **Code 5** promotion of agroecological practices, are increasingly mediated through voluntary pathways, innovation support, or long-term visions rather than binding targets. This reflects a political judgement about feasibility rather than a rejection of sustainability goals.

Across the three legislatures, a clear pattern emerges in terms of political viability. Policy frameworks framed as **technical, corrective or procedural**, and operating primarily through information, monitoring or enforcement, have proven comparatively resilient. This is visible in files such as the Consumer Agenda (2014–2020 and 2020–2025), the New Deal for Consumers, the Empowering Consumers for the Green Transition Directive (EU) 2024/825 and strengthened enforcement of the Unfair Trading Practices Directive (EU) 2019/633. These instruments typically rely on established legal bases, preserve Member State discretion, avoid visible redistribution, and impose limited short-term costs on powerful economic actors. This helps explain why many consumer related initiatives progressed even as broader sustainability ambitions stalled or were scaled back under more ambitious transition frameworks such as the European Green Deal and the Farm to Fork Strategy.

By contrast, frameworks that more directly challenge **distributional interests, production models or competitiveness narratives** encounter significantly greater resistance. This dynamic was evident in the rejection and withdrawal of the Sustainable Use of Pesticides Regulation (SUR), the delay and fragmentation of the Sustainable Food Systems Initiative, the political contestation surrounding the Green Claims Directive, and resistance to mandatory sustainable public procurement criteria under Farm to Fork. This is especially the case where interventions move beyond consumer empowerment toward structural food system change. It is in this space that policies associated with **Code 5** (promotion of agroecological practices) and **Code 6** (food environments) are most politically exposed.

Reading through the coding framework, the analysis also reveals where the EU can act with the least institutional and political friction. **Code 2** (authorisation of health claims) remains relatively stable across cycles, reflecting its technocratic, science-mediated and routinised nature. Anchored in EFSA-based risk and claims governance, it rarely triggers the coalition-building or distributive conflict that can derail more transformative reforms.

Code 3 (food labelling and information to consumers) becomes progressively more contested over time. What begins as a classic internal-market transparency tool increasingly evolves into a battleground over sustainability claims, labelling architectures and the regulation of corporate marketing space.

Code 4 (monitoring) gains prominence as enforcement and oversight emerge as the lowest-common-denominator form of action. When agreement on substantive policy direction proves difficult, institutions converge around improving measurement, coordination and compliance as a politically acceptable way forward.

By contrast, **Code 5** marks a clear conflict line: once frameworks imply binding input reductions or production constraints, they collide with narratives around competitiveness, farmer income and food security. **Code 6** is even more politically sensitive, as it intervenes in everyday food environments, public procurement, schools, fiscal incentives and dietary norms, where subsidiarity concerns, cultural preferences and distributional effects intensify resistance.

Against this backdrop, the EU’s portrayal of consumers evolves in step with the shifting political context. During 2014–2019, consumers are primarily framed as protected market participants; in 2019–2024, they are repositioned as levers of the sustainability transition; and in the current cycle (2024–2029, mapped to December 2025), they appear increasingly as stakeholders whose trust must be safeguarded while policy is recalibrated around delivery, competitiveness and economic constraints. This evolution mirrors the broader trajectory from incremental legal correction to systemic transition rhetoric, and finally to a phase in which the politics of implementation, burden-sharing and distribution determine which ambitions are realised, rescaled or postponed.

Table 8: Consumer framing by legislature

Legislature	Consumer framing
2014-2019	Consumer as protected market participant
2019-2024	Consumer as lever of the sustainability transition
2024-2029	Consumer as stakeholder whose trust must be safeguarded

The table above synthesises the preceding analysis by translating recurring patterns across codes, keyword distributions and identified gaps into dominant framings of the consumer. These framings do not derive from any single policy instrument but emerge inductively from how consumers are positioned

across EU frameworks: as recipients of information, targets of market transparency measures, or indirect beneficiaries of production- and environment-oriented policies. As shown above, the dominance of Code 3 instruments and high-frequency use of terms related to information, labelling and sustainability contrast with the near absence of language on participation, culture or agency. Together with the limited presence of food environment interventions (Code 6), this supports the interpretation that EU frameworks primarily frame consumers as informed market actors rather than as participants in shaping food systems.

5. Gaps

The keyword analysis reveals a marked asymmetry in approaches and topics covered by sustainable food policy at the EU level. While certain concepts are heavily foregrounded, others are almost entirely absent or marginal, pointing to **gaps in framing rather than in policy activity per se**.

These gaps are analytically significant because they help identify areas where EU-level discourse remains narrower or more cautious than debates taking place at national, regional, or academic levels. The gaps identified in this section are derived from **the systematic keyword analysis** described earlier, rather than from qualitative interpretation of individual legislative instruments.

The methodology rests on **comparative frequency and relative salience**, not on the absolute presence or absence of policies. In the following, selected keywords are used to represent analytical dimensions already established in the coding process (Codes 2–6), including consumer information, monitoring and enforcement, production practices, food environments, health, ethics, and participation. For each dimension, the analysis compares the frequency of terms commonly used in academic literature and national policy debates with their occurrence in EU “framework” documents (i.e., strategies, action plans, agendas, visions and accompanying communications).

Gaps are identified where one of three recurring patterns emerges:

- (1) the complete absence of terms that would normally signal a particular policy lens (for example, *food democracy*, *food culture*, or *non-communicable disease*);
- (2) the systematic under-representation of normatively or politically salient concepts compared to more technical or managerial terms (for example, *ethical consumption* versus *labelling* or *monitoring*); or
- (3) asymmetric visibility between problem categories and transition pathways (for example, *meat* versus *plant-based*).

Importantly, these gaps do not automatically imply that the EU takes no action in these areas. In many cases, issues are addressed indirectly through adjacent policy domains or via proxies such as sustainability, efficiency, or consumer information. The observed absences therefore often reflect discursive silences or de-emphases at the level of overarching frameworks rather than a complete policy void.

At the same time, limited discursive visibility may in some cases correspond to weak or absent binding measures at EU level. These silences cannot be explained solely by legal competence or subsidiarity constraints. They also reflect political economy dynamics, including the influence of incumbent agri-food industries, lobbying pressures, and risks of regulatory capture, which shape what can be named explicitly in EU-level frameworks and what remains implicit or deferred. The keyword analysis thus highlights patterns of prioritisation and marginalisation, while recognising that silence can signal indirect governance, political sensitivity, or limited policy action.

The identification of these gaps is embedded in a broader **two-step analytical approach** combining: 1) a qualitative review of EU policy framework documents; and 2) the targeted keyword analysis described above. The two methods serve **distinct but complementary purposes**.

First, EU policy frameworks were analysed qualitatively to assess **what the EU chooses to articulate at the level of strategic orientation**, regardless of whether this translated into binding legislation. This framework analysis made it possible to trace shifts in emphasis across the three legislatures (2014–2019, 2019–2024, 2024–2029), examine how the role of consumers is framed over time, and identify areas where ambition is repeatedly signalled but not operationalised.

Second, keyword analysis was used **solely to support the identification of discursive gaps**, not to interpret the substance of individual frameworks. High-frequency terms indicate areas of discursive consolidation, while systematic absence or rarity signals boundaries of political articulation. These patterns were then interpreted in light of the framework analysis, allowing gaps to be characterised as **avoidance, deferral, or indirect treatment**, rather than as simple policy omissions.

This combined approach allows gaps to be identified **without assuming a lack of EU activity**. Instead, gaps are understood as moments where policy ambition is reframed into technical instruments, delegated to Member States, absorbed into other legislative files, or postponed altogether. Analysing frameworks (including delayed, unpublished or withdrawn initiatives) was therefore essential to capture **pre-legislative ambition, political caution, and narrative boundaries**, and to avoid bias toward only those policies that survived the legislative process.

Finally, all gaps are interpreted through the same coding framework used for legislative acts (Codes 2–6), ensuring analytical consistency. This makes it possible to assess not only **what is under-articulated at EU level**, but also **which types of intervention** (such as food environments, agroecological transformation, or fiscal measures) are structurally more constrained at EU level and therefore more likely to be taken up, advanced, or experimented with by national and regional authorities.

Applying this lens across the mapped policies reveals a consistent structural pattern. Interventions centred on information provision, labelling, voluntary coordination, and research funding are comparatively well represented at EU level, while measures that directly reshape food environments, redistribute economic value along supply chains, or introduce binding consumption-related targets encounter significantly greater political and institutional resistance. Where ambition extends into these more structural domains, it is frequently softened, fragmented, or deferred. This indicates that EU-level governance of sustainable consumption systematically favours market-compatible and informational instruments over more redistributive or consumption-limiting approaches.

5.1 Gap 1. Implicit food environments: cultural and democratic gaps in EU policy

Terms such as **food culture** and **food democracy** do not appear at all (0 occurrences). These terms are analytically relevant in light of the coding framework developed earlier, particularly Code 6 (food environments), which explicitly captures policies that shape food choices through social, institutional and cultural contexts rather than through information or market signals alone. This contrasts sharply with the high frequency of more technical and system-level terms such as **sustainability (1321)**, **environmental impact (366)**, and **food waste (251)**.

From a keyword perspective, this indicates that EU frameworks frame **sustainable eating primarily as a technical and environmental challenge, rather than as a cultural, social or democratic process**. The absence of food culture and food democracy language suggests a gap in how everyday food practices, social norms and citizen participation are conceptualised at EU level. This gap is particularly relevant for **Code 6 (food environments)**, where cultural dimensions are central but remain largely implicit in EU discourse. The absence of democratic and cultural language may also reflect the political sensitivity of opening food policy to participatory or cultural claims that could challenge dominant market actors or established consumption models, making such framings more contested at EU level.

5.2 Gap 2. Ethics by proxy: the dominance of information and labelling in EU food policy discourse

The analysis shows that EU frameworks strongly emphasise **consumer information (224)** and **food labelling (521)**, while related but more politically charged concepts such as **ethical food consumption (6)**, **ethical food production (5)** and **policy change (10)** appear only sporadically.

This pattern suggests that EU policy discourse relies on information and labelling as proxies for broader ethical and behavioural questions, rather than naming these explicitly. Ethical dimensions of consumption and production are therefore addressed indirectly through technical instruments rather than through explicit normative framing.

5.3 Gap 3. Distributional silence and avoidance of conflictual language

The absence or near absence of terms such as **policy change (10)**, **triple change (2)** and **ethical food consumption (6)**, points to a reluctance to frame sustainable food policy in terms that imply **redistribution, behavioural constraint or structural transformation**. The scarcity of terms associated with redistribution or ethical judgement suggests that EU frameworks tend to avoid language that could foreground trade-offs between actors, sectors or social groups. Concepts such as ethical consumption

or policy change implicitly raise questions about who bears the costs of transition, whether consumption should be constrained, and how responsibilities are allocated across producers, consumers and public authorities. Their near absence therefore points to a discursive gap in which sustainability is framed primarily as an efficiency or optimisation challenge rather than a distributive one.

5.4 Gap 4. Absence of health-system framing beyond environmental proxies

The near absence of **non-communicable disease (1)** and the sporadic appearance of **healthy diets (17)** contrasts sharply with the high frequency of environmental and system-level terms such as **sustainability (1321)**, **environmental impact (366)**, and **food waste (251)**. From a keyword perspective, this suggests a gap in how health outcomes are framed within EU food policy discourse. While environmental sustainability is extensively articulated, diet-related health risks are not often named explicitly. This implies that public health considerations are addressed indirectly, for example through sustainability or consumer information, rather than through an explicit health-system or disease-prevention lens. The gap indicates a framing in which sustainable eating is primarily environmental rather than epidemiological, leaving health externalities largely implicit. Similarly, the low frequency of **ultra-processed foods (21)** stands out given its growing prominence in nutrition science and several national dietary strategies. Keyword analysis alone suggests that EU-level frameworks avoid directly naming or problematising specific food categories linked to unhealthy or unsustainable consumption patterns. This avoidance is particularly striking given the economic concentration of the ultra-processed food sector and the documented intensity of industry lobbying around nutrition policy, which may contribute to the political sensitivity of explicitly targeting such products at EU level.

The framework analysis further highlights this gap. The effective downgrading of Farm to Fork as a guiding framework, followed by its replacement with the Vision for Agriculture and Food, created a gap in EU-level framing of dietary transition. While Farm to Fork explicitly connected sustainability, health and consumption patterns, the newer framework recentres around competitiveness, resilience and production. This leaves a discursive and strategic vacuum around how diets should evolve to meet sustainability and health goals.

5.5 Gap 5. Weak articulation of citizen agency beyond information provision

While **consumer information (224)** appears frequently, terms implying active participation or agency, such as **food democracy (0)** or **policy change (10)**, are largely absent. This imbalance suggests a gap between consumers as informed recipients and consumers as active political or civic actors. Keyword analysis therefore points to a discursive framing in which consumers are positioned primarily as participants in markets, rather than as participants in shaping food policy or food systems. This reinforces

a model of governance centred on choice architecture and trust, rather than deliberation or co-decision. By framing consumers primarily as market actors rather than political subjects, EU discourse also limits avenues through which citizens could contest or counterbalance corporate influence within food system governance.

5.6 Gap 6. Decoupling of food production from ethical consumption

The extremely low frequency of terms such as **ethical food production (5)** and **ethical food consumption (6)** reveals a discursive gap in how EU frameworks link production practices to consumer-facing ethical considerations. Keyword analysis shows that while production-side impacts are frequently discussed through environmental proxies, such as **pesticides (146)**, **biodiversity loss (308)**, and **greenhouse gas emissions (107)** these are rarely framed in explicitly social terms or connected to moral responsibility along the food chain. This suggests that sustainability is predominantly articulated as a technical or environmental performance issue, rather than as an ethical relationship between producers, consumers and the conditions under which food is produced. The near absence of ethical vocabulary implies a reluctance to frame consumption choices as moral acts with implications for labour conditions, production methods or social justice, leaving a gap between production realities and consumer-oriented ethical narratives. As a result, ethical consumption is largely subsumed under neutral sustainability language, rather than explicitly recognised as a driver of accountability and change within food production systems.

5.7 Gap 7. Limited normalisation of plant-based language

With **meat** appearing **114** times and **plant-based** only **3**, the discourse seems weighted toward recognising or discussing meat, while giving limited textual space to the alternative that would operationalise a dietary shift. This can be read as a gap between **diagnosis** and **direction**: the frameworks are much more explicit about the object under discussion (meat), but far less explicit about the consumption pathway that would translate sustainability aims into a clear transition narrative (plant-based). This imbalance is further reflected in recent political debates over language at the EU level: in October 2025, the [European Parliament voted](#) in favour of amendments that would reserve traditionally meat-associated terms such as “burger, sausage and steak” exclusively for animal-derived products, effectively restricting their use on plant-based food labels.

5.8 Gap 8. Absence of a binding, horizontal food-systems framework

Across the period analysed, EU food policy frameworks consistently operate through sectoral strategies and thematic agendas (consumer policy, agriculture, environment, competition, health), without being consolidated into a binding, horizontal governance framework for sustainable food systems. This gap is most clearly illustrated by the non-adoption of the Sustainable Food Systems Framework, which was announced under Farm to Fork but never materialised as a legislative proposal. As a result, sustainability objectives remain dispersed across multiple frameworks with different legal bases, timelines and priorities.

5.9 Gap 9. Absence of binding dietary guidance with sustainability objectives

EU frameworks consistently avoid adopting binding or harmonised dietary guidance that integrates sustainability and health. This avoidance reflects a combination of legal and political constraints. Diets and public health nutrition fall largely within Member State competence and attempts to define EU-level dietary standards raise subsidiarity concerns, particularly where recommendations may affect cultural food practices, national health policies and agricultural interests. While strategies encourage Member States to update Food-Based Dietary Guidelines, EU frameworks stop short of defining minimum standards or shared sustainability benchmarks. This leaves a gap in which dietary change is acknowledged but not coordinated at EU level. National and regional authorities, however, retain full competence over dietary guidelines and have used this space to introduce more explicit recommendations on meat reduction, plant-based diets and environmental impacts of food choices.

5.10 Gap 10. Lack of explicit consumption reduction targets

EU frameworks articulate environmental targets (e.g. emissions, pesticides, deforestation) but avoid consumption-based targets linked to food categories or dietary patterns. The absence of framework-level consumption reduction objectives creates a gap between production-side ambition and consumption-side clarity. National and regional authorities, by contrast, can adopt quantitative targets (e.g. meat reduction in public catering or schools) without triggering EU-wide market distortions.

5.11 Gap 11. Weak framework-level treatment of public food procurement as a systemic lever

Although public procurement is repeatedly mentioned across EU frameworks, it is not consolidated into a strong, binding framework with mandatory sustainability criteria. This leaves a gap in translating strategic ambition into everyday food environments. National and regional governments, however, can adopt mandatory procurement standards, sustainability thresholds and sourcing requirements within their own public institutions.

5.12 Gap 12. Limited integration of social justice and affordability in sustainability transitions

EU frameworks increasingly acknowledge affordability and competitiveness concerns but rarely embed explicit social-justice mechanisms within sustainability strategies. The absence of distributive tools at EU framework level leaves a gap in addressing inequalities in access to sustainable food. National and regional authorities can intervene through fiscal measures, targeted subsidies, social procurement and school food programmes.

5.13 Gap 13. Sustainable food labelling beyond EU harmonisation delays

The delay and uncertainty surrounding the EU's sustainable food labelling framework has left a gap in translating sustainability objectives into consumer-facing signals. While EU frameworks continue to emphasise the need for credible information, the absence of legislation on this has opened space for national and regional initiatives to develop sustainability-related labelling, certification schemes or public endorsement systems tailored to local priorities.

5.14 Gap 14. Pesticide reduction after withdrawal of the SUR proposal

The withdrawal of the Sustainable Use of Pesticides Regulation represents a clear framework-level gap in EU ambition on input reduction. This gap arises because the SUR was the only initiative designed to translate the Farm to Fork pesticide reduction objectives into binding, harmonised national targets and enforceable obligations. While the EU retains long-term targets rhetorically, the absence of a binding regulatory framework removes common benchmarks, monitoring requirements and enforcement mechanisms, leaving implementation largely to Member States. The withdrawal reflects strong political resistance from several Member States and farming constituencies, particularly in the context of farmer protests, food security concerns and rising input costs following Russia's invasion of Ukraine, which made binding EU-wide input reduction politically untenable.

5.15 Gap 15. Limited EU-level framing of fiscal incentives for sustainable diets

While the Farm to Fork Strategy recognised fiscal and economic incentives as important levers for healthier and more sustainable diets, EU frameworks stop short of articulating a common fiscal approach. Taxation is consistently framed as an indirect tool and deferred to Member States on subsidiarity grounds, leaving EU action largely confined to analysis and encouragement rather than coordination or guidance.

This creates a gap between recognition and operationalisation. Although price signals are acknowledged as central to shaping food environments, they are not integrated into the EU's sustainability framework in a systematic way. As a result, issues such as food affordability, price differentials and equity remain weakly addressed at EU level.

6. Grouping gaps into thematic clusters

The gaps identified at EU framework level do not imply policy inaction, but rather **structural limits on what can be articulated or operationalised at EU level**. National, regional and local authorities frequently act where EU frameworks remain indirect, cautious or fragmented. The examples below are therefore not presented as “best practices” in a normative sense, but as **functional responses to EU-level discursive and governance constraints**, showing how specific gaps are being filled in practice.

The clusters are derived directly from the EU-level gap analysis. They were created by grouping individual gaps that point to the same underlying type of EU-level under-articulation. Concretely, each gap was first linked to the relevant governance code(s) (Codes 3–6) and to the policy function it concerns (e.g. shaping everyday food settings, addressing fairness and distribution, guiding diets and consumption patterns, strengthening governance and legal integration, mobilising economic levers, or sustaining production-side ambition). Gaps that shared the same function and governance logic were then grouped into a cluster. For transparency, each cluster therefore includes (i) a short definition, (ii) the relevant code(s), and (iii) an explicit list of the gaps it contains.

A selective, illustrative approach into clusters is used. Examples are grouped by **policy function**, rather than by country, to highlight how similar tools are mobilised across different contexts to address comparable EU-level limitations.

6.1 Cluster 1: food environments, culture and everyday practices

Structural, contextual conditions shaping consumption Code 6 Food Environment

This cluster captures gaps where EU frameworks acknowledge sustainability objectives, but **do not operationalise them in the spaces where food choices are normalised** (schools, public catering, cultural settings). EU frameworks largely treat food consumption as an outcome of information and markets, rather than as a product of **institutions, culture, participation and everyday environments**.

Included gaps:

- **Gap 1** –Implicit food environments: cultural and democratic gaps in EU policy
- **Gap 5** –Weak articulation of citizen agency beyond information provision
- **Gap 11** –Weak framework-level treatment of public food procurement as a systemic lever

6.2 Cluster 2: ethics, fairness and distributional questions

Who bears costs, who benefits, and how responsibility is framed (Codes 4, 5, 6)

This cluster groups gaps where EU discourse **avoids normative or redistributive language**, favouring technical or procedural framing. Ethical, social and distributive dimensions are **addressed indirectly or displaced**, leaving responsibility diffuse and trade-offs largely unspoken.

Included gaps:

- **Gap 2** – Ethics by proxy: the dominance of information and labelling in EU food policy discourse
- **Gap 3** – Distributional silence and avoidance of conflictual language
- **Gap 6** – Decoupling of food production from ethical consumption
- **Gap 12** – Limited integration of social justice and affordability in sustainability transitions

6.3 Cluster 3: health, diets and consumption patterns

Substantive dietary change and health outcomes (Codes 3 and 6)

This cluster highlights gaps where EU frameworks **recognise diet as an issue but avoid naming concrete health risks or food categories**. EU frameworks stop short of **explicit dietary direction**, leaving health and consumption change largely implicit or delegated.

Included gaps:

- **Gap 4** – Absence of health-system framing beyond environmental proxies
- **Gap 7** – Limited normalisation of plant-based language
- **Gap 9** – Absence of binding dietary guidance and consumption targets with sustainability objectives
- **Gap 10** – Lack of explicit consumption reduction targets

6.4 Cluster 4: governance architecture and legal integration

Fragmentation, coordination and binding force (Codes 4 and 6)

This cluster captures gaps related to **how EU food policy is structured**, rather than what it aims to achieve. Sustainability objectives remain **dispersed across files**, weakening coherence and slowing delivery of consumer-facing tools.

Included gaps:

- **Gap 8** – Absence of a binding, horizontal food-systems framework
- **Gap 13** – Sustainable food labelling beyond EU harmonisation delays

6.5 Cluster 5: economic levers and market signals

Prices, incentives and affordability (Code 6)

This cluster isolates gaps where the EU **acknowledges powerful tools but refrains from operationalising them**, citing subsidiarity and political sensitivity. Price-based instruments are recognised analytically but **left to Member States**, creating uneven consumer experiences across the EU.

Included gaps:

- **Gap 16** – Limited EU-level framing of fiscal incentives for sustainable diets

6.6 Cluster 6: production-side ambition and input reduction

Agroecological transformation and regulatory withdrawal — Code 5

This cluster groups gaps where **EU ambition has been explicitly scaled back**, leaving implementation uneven. Binding production-side transformation proves politically fragile, resulting in **framework-level retreat** and reliance on national action.

Included gaps:

- **Gap 15** – Pesticide reduction after withdrawal of the SUR proposal

7. Going beyond the gaps: Best practices at regional and national levels

In this section, the analysis shifts from identifying EU-level gaps to examining selected practices at national and regional levels that illustrate how these gaps are being addressed in practice within existing competences. The examples are not intended to provide an exhaustive inventory or to rank policies by effectiveness, but to illustrate concrete governance approaches that respond to limitations observed in EU frameworks.

The selection of practices followed a purposive and collaborative approach. Some initiatives were identified through the professional networks and policy engagement activities of the researchers' own organisations, reflecting ongoing involvement in food policy, consumer protection and sustainability debates. Others emerged through structured exchange and collaboration within the CUES consortium, drawing on the diverse geographical and thematic expertise of project partners. Selection was guided by relevance to the specific EU-level gaps identified earlier, clarity of the policy mechanism employed, and evidence of implementation rather than mere policy intent.

Together, these examples demonstrate how national and regional authorities operationalise sustainability objectives through instruments that remain weakly articulated at EU level, thereby providing practical insight into alternative governance pathways without implying direct transferability or normative endorsement.

7.1 Filling gaps in Cluster 1: food environments, culture and everyday practices

Cluster 1 components:

- **Gap 1** – Implicit food environments: cultural and democratic gaps in EU policy
- **Gap 5** – Weak articulation of citizen agency beyond information provision
- **Gap 11** – Weak framework-level treatment of public food procurement as a systemic lever

Spain (Catalonia Food Policy Council) - [Barcelona Food Policy Council \(2022\)](#)

This public institution-led initiative was established by the City of Barcelona to embed food governance within municipal policy through participatory structures. The Barcelona Food Policy Council brings together representatives from local government, civil society organisations, producer groups, consumer associations, academics and community initiatives to deliberate on and co-design food strategy. It operates within the framework of Barcelona's broader sustainable food strategy and has been particularly active in areas such as food justice, short supply chains, urban agriculture, and access to healthy and

culturally appropriate food. The Council institutionalises food governance as a cross-sectoral urban policy issue rather than limiting it to agriculture, health or consumer protection.

Why it matters: This initiative directly addresses the absence of food democracy and food culture within EU-level frameworks by embedding citizen participation into formal decision-making structures. Rather than relying solely on consumer information or behavioural nudges, it creates institutional space for collective deliberation on food systems, thereby strengthening citizen agency beyond market choice. By integrating food culture, social justice, and community knowledge into policy design, the Council demonstrates how food environments can be shaped through democratic governance. It offers valuable insights for EU policymaking by showing that food policy can move beyond information provision toward participatory and systemic approaches that recognise food as a cultural, social and political domain.

Germany - [Über den Tellerrand \(2013\)](#)

This organisation promotes integration and social participation, especially for people with refugee experience, through food-focused projects that foster exchange and mutual learning. At [its Kitchen Hub](#) in Berlin, people with and without refugee backgrounds meet regularly to cook, share meals, and celebrate cultural diversity. Initiatives like [Pinch of Humanity](#) and [World Kitchen](#) in Frankfurt bring together communities through shared culinary experiences, highlighting food's power to connect people and promote cultural understanding.

Why it matters: The projects this organisation works on are all focused on cultural exchanges centred around food culture. By implementing these projects bringing people with and without refugee experience from different countries, it highlights the importance of food culture, the social and cultural role of food in people's lives, and how food practices are linked to identity, tradition and community. In doing so, the projects work toward culturally sensitive interventions and respond to the absence of food culture in mainstream policy. They also offer valuable insights for EU policymaking by showing how food can be recognised as a driver of integration, social cohesion, and community-building beyond traditional approaches that focus only on employment or language.

The Netherlands - [Amsterdam Food Strategy \(2023\)](#)

The Amsterdam Food Strategy embeds cultural dimensions into its policy framework by for example transforming the city's food assistance programs. Previously, these programs were primarily focused on emergency relief. Under the new strategy, they have been restructured to promote food sovereignty and cultural inclusion. This includes supporting area-specific collaborations and initiatives like the food circle in Amsterdam Noord, which aims to increase food security while respecting cultural preferences and traditions. Additionally, the strategy emphasises the importance of community-driven food

initiatives. For instance, the city supports the development of “food commons” and community kitchens, which serve as platforms for residents to share culinary knowledge, preserve food heritage, and foster social cohesion.

Why it matters: For EU policymakers, this provides a practical model for linking culture with policy design: it illustrates that cultural inclusion is not just a social value, but also a strategic tool for achieving broader objectives such as food security, sustainability, and community cohesion across diverse populations.

7.2 Filling gaps in Cluster 2: ethics, fairness and distributional questions

Cluster 2 components:

- **Gap 2** – Ethics by proxy: the dominance of information and labelling in EU food policy discourse
- **Gap 3** – Distributional silence and avoidance of conflictual language
- **Gap 6** – Decoupling of food production from ethical consumption
- **Gap 12** – Limited integration of social justice and affordability in sustainability transitions

Belgium

[Make Belgium a Fair Trade Country \(2016-2017\)](#)

This campaign was launched in 2016, and a resolution was drafted and adopted in 2017 at the federal level with the clear ambition of making Fair Trade a real goal for Belgium. It aimed to achieve a variety of ethical consumption objectives by 2020 including:

- Increasing the ratio of Belgians who had heard of Fair Trade to 95 percent
- Every Belgian will spend approximately €15 on Fair Trade products per year
- All major supermarket chains will offer Fair Trade products
- 51 percent of Belgian municipalities will be Fair Trade Towns
- More than half the Belgian provinces will be equitable provinces
- 80 percent of federal and regional parliaments/ ministries and communities will consume at least two Fair Trade products regularly
- Fair Trade will be mentioned at least 600 times a year in the mainstream media

Why it matters: The “Make Belgium a Fair Trade Country” resolution directly addresses the gap in ethical consumption in food production. By setting national Fair Trade targets, the campaign structurally integrates fair practices in public and private sectors. These fair practices promote the ethical aspects of food production including fair wages, safe working conditions, and transparent sourcing. This illustrates the power of national policies in promoting ethical food production, and their ability to combat key systemic challenges like inequality by promoting sustainability efforts.

[Beyond Chocolate Initiative \(2018\)](#)

In December 2018, the Minister for Cooperation Alexander de Croo announced that, by 2025, 100 percent of Belgian chocolate will be sustainably certified. By 2030, the Belgian chocolate industry will no longer contribute to deforestation and cocoa farmers involved in the production of Belgian chocolate will all have a living income. Stakeholders, retailers, Belgian universities, NGOs, impact investors, trade unions and companies joined together and signed the initiative. The project began in January 2019, with different working groups established to examine themes including living income, child labour, monitoring and evaluation. The first pilot project focuses on living incomes for cocoa farmers in Côte d’Ivoire. Subsequent projects aim to establish sustainable organic and high-quality cocoa production in Yeyasso de Man cooperative in Côte d’Ivoire; improve incomes for cocoa farmers in Ghana (“Beyond Trees”); and manage environmental landscapes for cocoa livelihoods.

Why it matters: “Beyond Chocolate” promotes ethical consumption and food production by incorporating concrete commitments (i.e. living incomes for cocoa farmers and zero deforestation) into Belgium’s chocolate industry. The initiative unites the government, industry, retailers, and trade unions, to make ‘ethical chocolate’ by making production standards ethical. In doing so, these parties tackle key challenges such as labour exploitation, inequality and supply chain opacity.

[Ghent Food Strategy \(2015-2024\)](#)

This strategy aims to: 1) incorporate sustainability and position food as a central element in urban well-being; 2) encourage behavioural shifts in public consumption; and 3) increase the share of organic and Fair Trade food at receptions by 2024. It does this primarily by promoting Fair Trade products, free-range eggs, and fish with a Marine Stewardship Council label or equivalent; and working to ensure that 23% of school meals are organic and include Fair Trade products.

Why it matters: This strategy tries to bridge the gap between ethical consumption and ethical production by engraining social values into public procurement practices. It prioritizes Fair Trade products and socially responsible purchasing to ensure that food production is ethical, i.e. considering fair wages, safe working conditions and transparent sourcing. It provides a model for how local governments can promote ethical food production and consumption by addressing the labour realities behind food.

Spain - [Fair Trade practices in public procurement \(2008-current\)](#)

In Spain, different municipalities promote Fair Trade practices through different initiatives via public procurement:

- León City Council promoted Fair Trade and joined the Fair Trade Towns program (2008), adding Fair Trade coffee to vending machines.
- Córdoba City Council renews an annual agreement with IDEAS for the Fair Trade Cities campaign, offering training for municipal procurement staff.
- Aragón includes Fair Trade coffee clauses in procurement contracts for vending machines.
- Barcelona incorporates Fair Trade food, such as coffee, chocolate, and tea, into public food procurement.
- Sabadell offers a virtual guide on responsible consumption and Fair Trade, created with the Solidarity and Cooperation Council.
- Jerez de la Frontera features a dedicated Fair Trade section on its municipal website.
- Valladolid adapts contracts for SMEs, enabling them to compete more effectively in future tenders.

Why it matters: These municipal initiatives across Spain show how public procurement is used to promote ethical food production. By incorporating Fair Trade products into contracts and public catering, cities ensure that fair labour practices are reflected in everyday choices. It shows how local governments can incorporate ethical consumption values into procurement practices, which can help close the gap between ethical consumption and food production.

Germany - [Bohn \(2019\)](#)

The city of Bohn in Germany uses public procurement to implement SDGs and promote Fair Trade, with the following goals:

- By 2030, all products will be procured based on sustainability (social, regional, fair, ecological) criteria;
- Fairtrade Town designation (2010); dedicated position for Fair Trade coordination and annual Fair Week programme;
- Focus on minimum ecological and social standards for procurement staff, involving product users in the process;
- Development of the "[Sustainability Compass](#)" procurement tool to guide fair and sustainable purchasing;
- Strict sustainability criteria in procurement, including a 30% weighting for social criteria in tenders;
- Events like "Bonn - All Around Sustainable" merge Fair Trade and ecological activities, promoting sustainability;

Why it matters: Bohn's strategy works toward ethical production and consumption as an essential requirement in public procurement. Through its targets and tools like the Sustainability Compass, the city ensures it makes choices through procurement but also that consumer choices align with fair wages, safe working conditions, and transparent sourcing. Therefore, it addresses the ethical production gap, by basing its public procurement strategy on Fair Trade and sustainable goals.

7.3 Filling gaps in Cluster 3: health, diets and consumption patterns

Cluster 3 components:

- **Gap 4** – Absence of health-system framing beyond environmental proxies
- **Gap 7** – Limited normalisation of plant-based language
- **Gap 9** – Absence of binding dietary guidance and consumption targets with sustainability objectives
- **Gap 10** – Lack of explicit consumption reduction target

France – [Egalim Law \(2018\)](#)

France's Egalim Law on agriculture and nutrition promotes healthy diets through two main aims:

- Enhancing the sanitary, environmental and nutritional quality of products for healthy, high quality, sustainable food.
- Driving the reduction of social inequality and as a vehicle for public health.

This law promotes healthy and environmentally friendly choices, by adopting an approach to food that combines nutritional balance and pleasure, but also by ensuring a consistently high level of food safety^[1]. It has reform measures for institutional catering (i.e. schools, hospitals, prisons, welfare centres) that focus on serving sustainable high-quality food products and providing information to consumers. For example, by aiming to have 50% of products with indications of origin and quality in public catering by 2022, it promotes healthy food for all.

Why it matters: The Egalim law has some aspects which focus on healthy diets as a key objective of food policy. By placing targets on achieving organic and high-quality products in institutional catering and helping low-income families access school meals with healthy foods, this law aims to tackle this health gap. Consumers who regularly buy or consume organic food have healthier dietary patterns associated with various health benefits, including a reduced risk of chronic diseases such as type 2 diabetes and cardiovascular diseases^[2]. This shows an effort to improve the dietary quality and access to healthy foods in France, and while it does not specifically target NCDs, it works to improve food quality which helps address the healthy diets gap and indirectly their role in preventing NCDs.

Portugal - CIM Alto Minho – FEAST Living Lab (2022)

The CIM Alto Minho Living Lab in northern Portugal is focused on transitioning public school canteens toward healthier and more sustainable food systems. In partnership with ten municipalities and the Polytechnic Institute of Viana do Castelo (IPVC), this FEAST Living Lab works to improve dietary habits, support local producers, shorten supply chains, and reverse the abandonment of cultivated land. Its core strategy centres on school meals as a catalyst for broader change, especially by engaging children, teachers, municipal leaders, food suppliers, and canteen managers.

Why it matters: The Lab addresses key dietary and structural factors that influence long-term health. It uses school meals as a way of improving dietary habits, supporting healthier food environments for children and addressing behavioural change, community involvement and shorter supply chains.

Denmark - Official dietary guidelines (2021)

In response to rising rates of obesity and diet related non-communicable diseases such as type 2 diabetes, cardiovascular conditions, and certain cancers, Denmark launched its National Action Plan for Healthier Food and Meals in 2021. The initiative was developed by the Danish Ministry of Food, Agriculture and Fisheries in close collaboration with the Ministry of Health.

A central motivation for the plan was that Danes were consuming too much salt, sugar, and saturated fat, while falling short of recommendations for fruit, vegetables, whole grains, and fish. The plan set measurable targets to help shift population wide dietary patterns, such as reducing salt intake, increasing fibre consumption, and promoting more plant-based foods. One of the central pillars of the plan is **public communication** and **awareness-raising**, aligning closely with the idea that empowering citizens with information is key to preventing NCDs. The government used a range of **communication tools** to promote healthier diets, including mass media campaigns, educational materials for schools and municipalities, and partnerships with chefs and influencers to make healthy eating more relatable and aspirational.

- The “**Alt tæller**” (“**Everything counts**”) **campaign** emphasised small, achievable steps toward healthier eating, such as replacing white bread with rye bread or adding one extra vegetable to dinner. It used **TV spots, social media ads, and posters** in public spaces, schools, and health clinics. The tone was positive and non-moralising, aiming to motivate rather than shame. “**Healthy food doesn’t need to be difficult or expensive**” was a key message across the campaigns, aiming to reach low-income households and thereby reduce inequalities in diet-related health.
- A campaign aimed at **canteen managers and public kitchens** promoted the concept of the “**New Nordic Diet**”, a healthy and environmentally sustainable dietary pattern rich in root vegetables, whole grains, berries, legumes, and fish, and low in processed meats and refined foods.

- Schools received [teaching materials](#) aligned with the national dietary guidelines, often delivered in collaboration with municipalities. These included fun challenges like “fruit and vegetable weeks”, and cooking classes focused on preparing healthy meals.

Why it matters: This action plan is particularly relevant to this cluster of gaps due to its understanding that dietary change cannot be achieved through personal responsibility alone. It explicitly recognised the importance of creating a supportive information environment, where healthy choices are easier and more appealing. Communication campaigns used simple, encouraging language and visuals to show that healthier eating can be accessible and enjoyable, countering stigma and promoting a collective sense of responsibility.

Germany - [Updated national dietary Guidelines \(2024\)](#)

Germany has published in 2024 new federal dietary guidelines which recommend reducing meat consumption and increasing intake of legumes, whole grains, and plant-based proteins, not just for health, but explicitly for climate protection. These guidelines are the first to be produced with a **mathematical optimisation model that minimises both chronic-disease burden and greenhouse-gas emissions**. The guidelines roll out toolkits for schools and canteens and add monitoring indicators by 2027 supported by the German Nutrition Society offering practical advice, sample menus, and upcoming educational materials aimed at both the general public and institutional settings like schools.

Why it matters: Germany’s model illustrates how dietary guidelines can serve as a bridge between high-level climate objectives and everyday consumer choices.

France - [Egalim Law and School Meal Reform \(2018\)](#)

France’s Egalim Law mandates that all public schools offer at **least one vegetarian meal per week**. This is not just about reducing meat consumption, it’s about familiarising children with diverse, healthy, plant based foods early in life. Some cities, like [Paris](#), go further, offering vegetarian options more frequently.

Why it matters: France’s *Egalim* law demonstrates how binding rules, such as the requirement to serve at least one vegetarian meal per week in schools, can successfully embed plant based eating into public food culture. It shifts vegetarian meals from being optional to becoming a regular and accepted part of children's diets, helping to normalise healthier and more sustainable food choices early in life.

The Netherlands - [The Wheel of Five \(2023\)](#)

The Netherlands uses a visual, public friendly tool known as the “Wheel of Five” to communicate dietary advice. It emphasises that **no more than 40% of protein should come from animal sources**, promoting legumes, nuts, and plant-based protein alternatives. The tool is supported by a **public education infrastructure** that includes school programs, digital tools, and health professional training.

Why it matters: This is an example of consumer-focused communication that helps individuals make sustainable food choices in everyday life.

Spain - [“Menos Carne, Más Vida” Campaign \(2022\)](#)

Spain’s Ministry of Consumer Affairs launched a mass-media push urging people to cut meat to the 0-3 servings per week recommended by its **scientific committee, linking over-consumption to climate and health costs**. The controversy generated weeks of primetime debate, raising awareness that Spaniards eat nearly double the recommended amount.

Why it matters: This national media campaign on reducing meat consumption shows how timely, emotive initiatives can spark a public debate, especially when anchored in science and practical dietary guidance. While the campaign grabbed attention, it was not warmly received, showing how hard it is to change consumer habits. At the EU-level, citizens have also tried to push a similar conversation. In 2022, the European Citizens’ Initiative [End the Slaughter Age](#) sought to phase out subsidies for animal agriculture and channel support towards plant based and cultivated alternatives. Despite being formally registered by the Commission, the initiative failed to gather the required one million signatures across Member States and therefore did not advance. Together, these examples highlight the challenge: shifting diets requires not just bold messaging, but resonance with public sentiment, institutional support, and clear guidance.

Horizon2020 - School Food for Change (SF4C) Project (2022-2026)

The [SF4C](#) project, consisting of 43 partners and lead by ICLEI – Local Governments for Sustainability, introduced the [Whole School Food Approach](#) in over 3,000 schools across 16 EU countries. This approach reimagines schools as living food systems, transforming what children learn about food, how it is procured, and how the entire community, from cooks and teachers to farmers and families, is involved.

One of the partners, the city of [Ghent](#), has developed a [food Strategy](#) which encourages behavioural shifts in public consumption, particularly by introducing plant based protein as a complement or replacement of animal protein (i.e. “[Thursday Veggie Day](#)” in public institutions). In particular, under SchoolFood4Change, Ghent expanded this vision inside its schools with a series of connected initiatives.

At [GO! Middle School and GO! Atheneum Voskenslaan](#), students helped test and launch new plant based sandwich spreads, reinforcing the idea that healthy food can be both tasty and co-designed. At [De Mozaïek Primary School](#), children participate in a “Pimp Your Soup” bar and run a pop-up veggie shop before school, helping to normalise vegetables in their daily diet.

Similar transformations are taking place in other cities in the project:

- [Milan](#) has integrated plant-based options into procurement contracts and launched “farm-to-school twinning” to bring farmers into the classroom.
- [Vienna](#) runs mobile cooking workshops on vegetarian meals and trains teachers as “lunch ambassadors” to support children’s engagement with sustainable eating.
- [Dordogne](#) achieved 100% organic, largely plant-based school meals without raising costs for the municipality.
- Cities like [Nuremberg](#), [Essen](#), and [Tallinn](#) have hosted public events and curriculum-linked activities around climate-friendly and plant based diets.

Why it matters: In a policy context where the EU’s Sustainable Food Systems law was withdrawn, and where Green Public Procurement criteria remain voluntary, SchoolFood4Change shows what committed local governments can do in the absence of top-down mandates. It demonstrates that the public plate can be a lever for systemic change particularly in promoting plant-based foods.

Spain - [FoodCLIC Barcelona Living Lab \(2022-2027\)](#)

FoodCLIC is an EU-funded project that connects people and policies from different sectors for an integrated approach to transform urban food environments and food systems. Through this project, the Metropolitan Area of Barcelona sees a need for improvement in people’s health and nutrition as the prevalence of food related diseases is on the rise. Therefore, they implement a series of food-related policies and food initiatives to tackle this issue. Among these are:

- [PEAC- Strategic Food Plan of Catalonia](#): A proposal of measures to be developed at the regional level in Catalonia led by the government. It promotes change towards a new food system which produces healthy, accessible and quality food, aiming to promote healthier eating patterns and safeguarding the health of customers.
- [Barcelona Healthy and Sustainable Food Strategy for 2030](#): A roadmap developed by the Barcelona City Council together with food system stakeholders and civil society for achieving a healthier and more sustainable food system. This includes aims such as healthier and more sustainable food canteens.
- [Xamec](#): An Agroecological Network of School Canteens of Catalonia including five school canteens, an organic vegetable garden, an agroecological purchasing centre, a restaurant association and an NGO. They offer 17,000 agroecological menus on a daily basis in 24 schools and 22 restaurants, and have a school canteen model which focuses on quality, organic seasonal and local food. Agroecological foods are directly linked to healthy and nutritiously diverse foods.

Why it matters: This project offers policies and initiatives that work to improve health and nutrition in relation to the rise of food-related diseases. The Metropolitan Area of Barcelona, including the government, the Barcelona City Council, stakeholders and civil society work together to implement food policies and initiatives to tackle the Cluster 1 gaps. By pushing for healthier eating patterns through transforming the food system, creating healthier canteens, promoting organic foods and food education, this project brings a health rationale to food system change.

7.4 Filling gaps in Cluster 4: governance architecture and legal integration

Cluster 4 components:

- **Gap 8** – Absence of a binding, horizontal food-systems framework
- **Gap 13** – Sustainable food labelling beyond EU harmonisation delays

Vienna, Austria - Sustainable Gastronomy and Urban Farming (2023)

Vienna aims to become carbon neutral by 2040, significantly ahead of the Paris Agreement's targets. Urban farming and sustainable agriculture play a crucial role in this initiative. The city features nearly 5,000 acres of fields and vineyards, further supported by educating and aiding local growers to reduce their ecological impact. Viennese restaurants reflect these changes through fresh, local, and produce-driven menus, moving away from traditional meat-heavy dishes. For instance, the vegetarian restaurant Tian, renowned for its locally sourced ingredients, earned a Michelin Green Star for its sustainable gastronomy. Similarly, Alma offers biodynamic wines and daily fresh menus utilizing locally grown produce. Smaller producers, like Hut & Stiel, repurpose coffee grounds to grow mushrooms, while Gugumuck Wiener Schnecken Manufaktur promotes sustainable snail farming.

Why it matters: Vienna’s approach illustrates what a true “triple change” looks like, linking policy, culture, and the value chain into a coherent transformation of the local food system. Through its Sustainable Gastronomy and Urban Farming Strategy, the city embeds climate and food objectives into policy, supporting local production, sustainable procurement, and the goal of carbon neutrality by 2040. At the same time, a cultural shift is underway as restaurants and consumers embrace plant-forward, seasonal cuisine, with places like Tian and Alma redefining Viennese gastronomy around sustainability and local sourcing. This cultural change is reinforced by value chain innovation: urban farmers, biodynamic wine producers, and circular initiatives such as Hut & Stiel’s mushroom cultivation from coffee waste demonstrate new business models that reduce emissions and strengthen local resilience. Together, these developments show how aligning governance, social norms, and production practices can turn sustainability from a niche effort into a shared urban identity and a practical pathway toward climate neutrality.

7.5 Filling gaps in Cluster 5: economic levers and market signals

Cluster 5 components:

- **Gap 16** – Limited EU-level framing of fiscal incentives for sustainable diets

Hungary – [Public Health Product Tax \(2011\)](#)

Hungary implemented a “junk food tax” (Public Health Product Tax) on packaged foods and drinks with high levels of sugar, salt or fat. This policy led to decreases in consumption of processed foods and shifted some consumption toward less processed choices. Revenues from the tax were earmarked for public health spending, further reinforcing positive market incentives.

Why it matters: This use of taxation illustrates how fiscal policy can be *designed with explicit public health and diet objectives*, going beyond general consumption taxes. Earmarking revenue toward health and nutrition initiatives strengthens the market signal that sustainable diets are a priority.

France - [Taxation on sugary foods and beverages \(2011\)](#)

France has implemented taxes on sugar-sweetened beverages and other unhealthy food categories to reduce consumption of nutrient-poor, energy-dense products. These measures are now well documented and recommended by public-health bodies because they reduce demand for these products and can improve diet quality.

Why it matters: These taxes function as economic disincentives embedded into food prices, shaping consumer behaviour and sending a clear market signal that less healthy products should be less affordable.

The Netherlands - [Netherlands, policy modelling on VAT reform \(2025\)](#)

Although still largely in the policy discussion phase, modelling in the Netherlands shows the potential impact of reforming VAT rates on food, reducing VAT on fruits & vegetables while increasing VAT on meat and dairy, to incentivise diets that are both healthier and lower in environmental impact. This kind of fiscal design demonstrates how fiscal systems could be restructured to align price signals with sustainability goals.

Why it matters: This illustrates a concrete approach for using tax system reform (differentiated VAT) to guide consumers toward more sustainable diet patterns. In contrast, current EU VAT frameworks often treat all food similarly, regardless of environmental or health externalities.

7.6 Filling gaps in Cluster 6: production-side ambition and input reduction

Cluster 6 components:

- **Gap 15** – Pesticide reduction after withdrawal of the SUR proposal

Luxembourg - [PAN \(2017\)](#)

Luxembourg has adopted a clear and quantitative national commitment to pesticide reduction through its National Action Plan. Its target is to **halve pesticide use by 2030**. This objective is embedded in a broader strategy combining restrictions on pesticide use in sensitive areas, strengthened integrated pest management requirements, and support for alternatives such as organic and low-input farming. Luxembourg has also implemented bans for certain uses earlier than many other EU countries, notably phasing out pesticide use in public spaces. The country also aligns its reduction target with water protection and biodiversity objectives.

Why it matters: This initiative matters because it demonstrates that binding, numeric pesticide reduction targets can be set and operationalised at national level even in the absence of EU-wide legislation like the SUR. Luxembourg provides a concrete example of how Member States can maintain production-side ambition and policy coherence with Farm to Fork objectives, preventing backsliding after the withdrawal of EU-level targets.

Denmark - [National Action Plan \(Strategy 2017-2021\)](#)

Denmark has pursued pesticide reduction for several decades through a comprehensive national framework centred on its [Pesticide Load Indicator \(PLI\)](#), a risk-based metric that accounts for toxicity and environmental impact rather than volume alone. Subsequent national action plans have set explicit targets to reduce the pesticide load, supported by measures such as differentiated pesticide taxes, bans on the most hazardous substances, mandatory advisory services, and strong monitoring systems. As a result, Denmark has achieved substantial long-term reductions in pesticide risk and use while maintaining agricultural productivity.

Why it matters: This experience is highly relevant for Gap 15 because it shows that risk-based national targets and economic instruments can deliver meaningful pesticide reduction without an EU-wide SUR framework. Denmark illustrates how Member States can translate the principle of input reduction into enforceable national policies, offering a credible model for maintaining production-side ambition and reducing dependency on chemical pesticides despite the current EU policy vacuum.

7.7 Analysis of best practices at national and regional levels going beyond EU policy gaps

National and regional initiatives provide useful insight into how EU policy frameworks operate in practice, particularly in relation to sustainable consumption. In several Member States, sub-national authorities have adopted measures that translate sustainability objectives into concrete action more effectively than EU-level instruments, especially where EU policies remain non-binding, delayed or fragmented. These practices suggest that EU policies often function as enabling frameworks by offering legal clarity and political direction, while at the same time limiting ambition by leaving key decisions to lower levels of governance.

Public food procurement is a clear example of this dynamic. Although EU strategies such as Farm to Fork recognise the potential of public procurement to influence consumption patterns, the absence of binding EU-wide sustainability criteria has resulted in uneven implementation. In response, national and local authorities in countries such as France, Italy and Denmark have introduced mandatory requirements for organic sourcing, local food, or Fair Trade products in public catering and school meals.

These initiatives demonstrate that EU procurement rules permit the integration of sustainability considerations, but do not actively drive them. As a result, access to sustainable food through public institutions varies considerably across the Union.

A similar pattern can be observed in the use of fiscal measures to support sustainable consumption. While the EU acknowledges the role of price signals in shaping consumer behaviour, it has largely refrained from proposing coordinated fiscal instruments in this area. Several Member States have therefore acted independently, introducing taxes on sugar-sweetened beverages or ultra-processed foods, as well as reduced VAT rates or subsidies for healthier and more sustainable options. EU rules allow such measures, but the lack of an EU-level framework means that their scope and effectiveness remain uneven, and concerns around affordability and social equity are addressed inconsistently across countries.

National dietary guidelines offer further evidence of bottom-up approaches filling EU-level gaps. In countries such as Denmark and Germany, environmental sustainability has been explicitly incorporated into food-based dietary guidelines, including recommendations to reduce meat consumption and food waste. At EU level, action in this area has remained largely facilitative, focusing on evidence generation and exchange of practices rather than common guidance. This limits coherence across Member States and weakens the potential of dietary advice as a tool to normalise sustainable eating patterns.

At regional and local level, several authorities have also moved beyond information-based approaches by intervening directly in food environments. Measures such as sustainability criteria in public catering, restrictions on certain marketing practices, or default sustainable options in institutional settings reduce reliance on individual consumer choice. These initiatives highlight the limitations of EU policies that prioritise information provision and labelling, while also exposing the legal and political constraints faced by local authorities operating within internal market rules.

Taken together, these best practices suggest that EU policies primarily enable sustainable consumption indirectly, by setting minimum standards and opening space for action, rather than actively driving systemic change. Where EU measures remain voluntary or narrowly focused on consumer information, national and regional authorities have stepped in to address affordability, availability and social sustainability. While this has encouraged innovation, it has also led to fragmentation, with sustainable consumption opportunities depending heavily on national and local policy choices rather than being ensured uniformly across the Union.

8. Conclusion

This policy mapping examined how the EU addressed sustainable food consumption between 2015 and 2025, using a structured approach with three main elements. First, more than 1,500 EU-level policy documents were screened against clear relevance criteria. This led to the identification and coding of 78 published and 23 unpublished policies related to sustainable consumption, as well as associated communication tools. Second, these policies were grouped through an inductive coding process based on their main governance approach. A keyword search was then carried out using 34 terms in five broad themes: Environment, Consumers, Value Chains, Cross-Cutting Categories, and Health. Third, the mapping included a chronological analysis of strengths and gaps in EU policy frameworks across successive European Commission mandates (2014–2019, 2019–2024, 2024–2029). It also reviewed national and regional examples that helped address gaps identified at EU level. Taken together, these elements made it possible to look across legislative tools, strategies, and how they had been implemented over time.

The coding and keyword analyses (Sections 2-3) revealed distinct approaches but similar topical emphases in comparing published and unpublished policies on sustainable food. Beginning with the approaches, first, unpublished policies on food labelling go beyond published policies, not only providing information about sustainability to consumers, but also removing unsustainable products from the market. This addition indicates a greater willingness to shape more sustainable food environments at the EU level, alongside informing consumers about the sustainability of their food choices. Second, whereas published policies promoting agroecological practices primarily supported sustainability research, unpublished policies moved to targeting food systems directly through wide-ranging and ambitious policy frameworks. Third, published policies on monitoring focused on food safety and quality control, whereas unpublished policies targeted broad environmental regulations, e.g., on soil health, unsustainable fishing, and waste. Moving to topical emphases, both published and unpublished policies emphasised keywords related to, first, environmental concerns, and second, food labelling. The main topical difference highlighted by the keywords analysis is the more frequent use of keywords related to value chains in unpublished compared to published policies. These keywords were: food waste, food systems, and pesticides. Taken together, the coding and keyword analyses indicate that unpublished policies are more active and ambitious in their approaches than published policies, with greater emphasis on developing more sustainable value chains.

The policy framework analysis (Section 4) showed a few consistent patterns in how EU policy frameworks approached sustainable food consumption. Overall, the findings underscored those of the coding and keywords analyses. First, sustainable food consumption was mainly framed through environmental and climate objectives, while social aspects such as fairness, affordability and public participation received less attention. In the keywords analysis, terms related to environmental concerns were by far the most used keywords across all policies, with social aspects (e.g., ethical food consumption, economic inequality) appearing infrequently. Second, there was a clear gap between broad strategic ambitions and concrete legislation. For example, strategies like the “Farm to Fork” set out far-reaching goals, but several key initiatives were delayed, scaled back or dropped. This echoes the coding analysis, which

found that many unpublished policies like Farm to Fork had more ambitious sustainability goals than published policies (legislative acts). Third, EU action also relied largely on information tools, monitoring and voluntary coordination, with fewer binding measures that would directly influence consumption. This reliance was also revealed by the coding analysis, which found that published policies emphasised information provision and monitoring, whereas unpublished policies sought to influence consumption directly, primarily by making unsustainable products unavailable. At the same time, the policy frameworks analysis showed that subsidiarity concerns and political sensitivities (especially around diets, taxes and behaviour-related policies) limited the scope for stronger intervention. Lastly, even though policy framework documents increasingly referred to “food systems”, responsibilities remained spread across different policy areas such as agriculture, environment, health, consumer protection and the internal market, without a single framework bringing sustainable consumption objectives together.

The gaps analysis (Sections 5 and 6) pointed to several areas where EU policy still falls short in shaping sustainable food consumption. In some cases, these areas highlighted the findings of the coding, keywords, and policy frameworks analyses. First, consumers were treated mainly as people who receive information, rather than as citizens operating within social, cultural and economic food environments. As seen in the coding, keywords, and policy frameworks analysis, information to consumers was privileged over other, arguably quite effective tools for behavioural change, including food culture and measures to address economic inequality. Related to this, explicitly “ethical” language was rare in EU texts. Related ideas on fairness did appear (for example in discussions on unfair trading practices), but mostly in technical or market terms, not as part of a broader justice or values-based framing. Second, health was also not well integrated into sustainability discussions, so the two agendas often ran in parallel rather than being addressed together. The coding and keywords analysis pointed to this under-emphasis on health, revealing the strong separation between policies on health information about food and those on food sustainability, and the near absence of health-related keywords in policies on sustainable food. Third, clear consumption-reduction targets (for instance on meat or other resource-intensive foods) were absent, despite strong environmental arguments. Fourth, economic tools such as VAT changes, subsidies or fiscal incentives remained underdeveloped at EU level. Lastly, public food procurement was widely recognised as an important lever, but there was no comprehensive mandatory EU framework to guide it. Overall, these gaps reflected a continued reliance on information-based approaches rather than stronger structural measures, which limited the EU’s ability to drive more systemic change.

The review of national and regional policies (Section 7) showed that many of the gaps identified at EU level were already being addressed in practice, although not consistently across countries. In several cases, local and regional authorities introduced structural measures in food environments (especially through public procurement and school meals planning) making sustainable options the default without relying only on consumer awareness. Some Member States also used fiscal and economic tools to influence consumption, showing that price-based measures are workable in practice. Regional initiatives often combined health and sustainability goals, avoiding the policy split that was visible at EU level. Many of the stronger examples also paid explicit attention to social fairness and affordability, linking sustainability to wider equity concerns. Overall, local experience suggested that more ambitious measures can be politically and administratively feasible when there is a clear mandate and stakeholder

support. At the same time, these examples highlighted the risk of fragmentation as progress depended heavily on national priorities and capacity, leading to uneven ambition across the EU. In areas that require common market rules or shared sustainability criteria, national action alone was not enough.

Taken together, the findings showed that EU policies have laid some important groundwork for more sustainable food consumption. However, the EU approach has mostly focused on enabling change rather than driving it. Strategies often set out system-wide ambitions, but the legislation that followed did not always match that level of ambition, especially where measures would have directly shaped food environments, addressed inequalities, or more firmly steered consumption patterns.

National and regional experience showed that stronger, more structural measures are possible within existing legal frameworks. But without clearer and more binding direction at EU level, this progress is likely to remain patchy. A stronger EU role would mean moving beyond information-based approaches, taking a more holistic view of food environments, giving social sustainability equal weight to environmental goals, and better aligning strategic commitments with enforceable measures across the food system.

In the end, making sustainable food consumption the easy and typical choice across the EU will depend on closing several gaps: between vision and implementation, between environmental and social goals, and between supportive frameworks and real structural change.

9. Appendix

Table A8: List of reviewed policies in Code 1

Code 1: Support for citizens' initiatives	
Published policies (n=7)	Unpublished policies (n=0)
Commission Decision (EU) 2018/1304 of 19 September 2018	
Commission Decision (EU) 2019/1566 of 4 September 2019	
Commission Decision (EU) 2019/718 of 30 April 2019	
Commission Implementing Decision (EU) 2020/2200 of 17 December 2020	
Commission Implementing Decision (EU) 2021/1137 of 30 June 2021	
Commission Implementing Decision (EU) 2021/360 of 19 February 2021	
Commission Implementing Decision (EU) 2022/2053 of 18 October 2022	

Table A9: List of reviewed policies in Code 2

Code 2: Authorising or refusing to authorize health claims made on foods	
Published policies (n=31)	Unpublished policies (n=0)
Commission Regulation (EU) 2015/402 of 11 March 2015	
Commission Regulation (EU) 2015/539 of 31 March 2015	
Commission Regulation (EU) 2015/1041 of 30 June 2015	
Commission Regulation (EU) 2015/1052 of 1 July 2015	
Commission Regulation (EU) 2015/1898 of 21 October 2015	
Commission Regulation (EU) 2015/2314 of 7 December 2015	
Commission Regulation (EU) 2016/371 of 15 March 2016	
Commission Regulation (EU) 2016/372 of 15 March 2016	
Commission Implementing Regulation (EU) 2016/854 of 30 May 2016	
Commission Implementing Regulation (EU) 2016/862 of 31 May 2016	
Commission Regulation (EU) 2016/1379 of 16 August 2016	
Commission Regulation (EU) 2016/1411 of 24 August 2016	
Commission Regulation (EU) 2016/1412 of 24 August 2016	
Commission Regulation (EU) 2016/1413 of 24 August 2016	
Commission Implementing Regulation (EU) 2017/672 of 7 April 2017	
Commission Implementing Regulation (EU) 2017/676 of 10 April 2017	
Commission Regulation (EU) 2017/1200 of 5 July 2017	
Commission Regulation (EU) 2017/1201 of 5 July 2017	

Commission Regulation (EU) 2017/1202 of 5 July 2017
Commission Regulation (EU) 2018/199 of 9 February 2018
Commission Regulation (EU) 2018/1555 of 17 October 2018
Commission Regulation (EU) 2018/1556 of 17 October 2018
Commission Regulation (EU) 2021/77 of 27 January 2021
Commission Implementing Regulation (EU) 2021/686 of 23 April 2021
Commission Regulation (EU) 2022/710 of 6 May 2022
Commission Regulation (EU) 2022/711 of 6 May 2022
Commission Regulation (EU) 2022/719 of 10 May 2022
Commission Regulation (EU) 2022/727 of 11 May 2022
Commission Regulation (EU) 2023/648 of 20 March 2023
Commission Regulation (EU) 2023/1141 of 1 June 2023
Commission Regulation (EU) 2023/1101 of 6 June 2023

Table A10: List of reviewed policies in Code 3

Code 3: Food labelling and information to consumers	
Published policies (n=18)	Unpublished policies (n=5)
Commission Delegated Regulation (EU) 2015/1829 of 23 April 2015	European Parliament resolution of 18 January 2024 (2023/2049(INI))
Commission Implementing Regulation (EU) 2015/1831 of 7 October 2015	Revising the EU geographical indications for wine, spirit drinks and agricultural products
Commission Decision (EU) 2017/2337 of 29 May 2017	Green Claims Directive
Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018	Chemicals Strategy for Sustainability
Directive (EU) 2019/2161 of the European Parliament and of the Council of 27 November 2019	Packaging and Packaging Waste
Regulation (EU) 2019/1381 of the European Parliament and of the Council of 20 June 2019	
Regulation (EU) 2019/787 of the European Parliament and of the Council of 17 April 2019	
Directive (EU) 2020/1828 of the European Parliament and of the Council of 25 November 2020	
Regulation (EU) 2020/1693 of the European Parliament and of the Council of 11 November 2020	
Commission Delegated Regulation (EU) 2021/642 of 30 October 2020	
Commission Implementing Decision (EU) 2021/334 of 23 February 2021	

Regulation (EU) 2021/2117 of the European Parliament and of the Council of 2 December 2021	
Commission Delegated Regulation (EU) 2022/126 of 7 December 2021	
Regulation (EU) 2023/988 of the European Parliament and of the Council of 10 May 2023	
Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024	
Regulation (EU) 2024/1143 of the European Parliament and of the Council of 11 April 2024	
Directive (EU) 2024/1438 of the European Parliament and of the Council of 14 May 2024	

Table A11: List of reviewed policies in Code 4

Code 4: Monitoring	
Published policies (n=14)	Unpublished policies (n=7)
Commission Implementing Regulation (EU) 2017/892 of 13 March 2017	Unfair trading practices in the food supply chain
Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017	Plants Produced by Certain New Genomic Techniques
Directive (EU) 2019/633 of the European Parliament and of the Council of 17 April 2019	Soil Monitoring Law
Commission Implementing Decision (EU) 2020/1550 of 23 October 2020	Fisheries management measures
Commission Implementing Regulation (EU) 2020/2042 of 11 December 2020	Trade measures against countries allowing non-sustainable fishing
Commission Delegated Regulation (EU) 2021/1374 of 12 April 2021	Waste framework directive
Commission Delegated Regulation (EU) 2021/1691 of 12 July 2021	Products Associated with Deforestation
Commission Delegated Regulation (EU) 2021/1698 of 13 July 2021	
Commission Implementing Regulation (EU) 2021/1165 of 15 July 2021	
Commission Implementing Regulation (EU) 2021/2325 of 16 December 2021	
Commission Implementing Decision (EU) 2022/1947 of 13 October 2022	
Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023	

Commission Implementing Regulation (EU) 2023/2229 of 25 October 2023	
Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024	

Table A12: List of reviewed policies in Code 5

Code 5: Promotion of agroecological practices, including research initiatives	
Published policies (n=9)	Unpublished policies (n=10)
Decision (EU) 2017/1324 of the European Parliament and of the Council of 4 July 2017	Strengthen the position of farmers and the trust of the actors in the food supply chain
Commission Decision (EU) 2018/813 of 14 May 2018	Production and Marketing of Plant Reproductive Material
Commission Implementing Decision (EU) 2018/210 of 12 February 2018	Sustainable use of plant protection products
Commission Implementing Decision (EU) 2021/173 of 12 February 2021	EU fertilising products
Council Regulation (EU) 2021/2085 of 19 November 2021	Farm to Fork Strategy on Sustainable Food System
Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021	The European Green Deal
Regulation (EU) 2021/783 of the European Parliament and of the Council of 29 April 2021	A Vision for Agriculture and Food
Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023	EU Biodiversity Strategy for 2030
Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024	Commission Work Programme 2023
	Commission Work Programme 2025

Table A13: List of reviewed policies in Code 6

Code 6: Food environments	
Published policies (n=0)	Unpublished policies (n=1)
	EU school fruit, vegetables and milk scheme



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