

# Towards sustainable food consumption

The policy landscape

SA  EA

Science Advice for Policy by European Academies

The text of this work is licensed under the terms of the Creative Commons Attribution licence which permits unrestricted use, provided the original author and source are credited. The licence is available at <http://creativecommons.org/licenses/by/4.0>. Images reproduced from other publications are not covered by this licence and remain the property of their respective owners, whose licence terms may be different. Every effort has been made to secure permission for reproduction of copyright material. The usage of images reproduced from other publications has not been reviewed by the copyright owners prior to release, and therefore those owners are not responsible for any errors, omissions or inaccuracies, or for any consequences arising from the use or misuse of this document.

This document has been produced by the SAPEA consortium. The information, facts and opinions set out in this report are those of the authors and do not necessarily reflect the opinion of the European Commission. The SAPEA Consortium is not responsible for the use which may be made of the information contained in this report by anyone, including the European Union institutions and bodies or any person acting on their behalf.

- DOI 10.5281/zenodo.8032480
- Downloadable from <https://www.sapea.info/topics/food-consumption/>

## Version history

Version	Date	Summary of changes
1.0	28 June 2023	First published version

### Publisher

SAPEA  
c/o acatech  
Pariser Platz 4a  
10117 Berlin, Germany

### Contact

SAPEA Communications Office  
Rue d'Egmont 13  
1000 Brussels, Belgium  
[contact@sapea.info](mailto:contact@sapea.info)



Science Advice for Policy by European Academies

# Towards sustainable food consumption

## *The policy landscape*

### Table of contents

<b>Introduction</b>	<b>5</b>
<b>Foodstuffs, consumer protection and General Food Law</b>	<b>8</b>
<b>Labelling and nutrition</b>	<b>14</b>
<b>Farm-to-Fork Strategy</b>	<b>18</b>

# About SAPEA

SAPEA brings together outstanding expertise from natural sciences, engineering and technology, medical, health, agricultural and social sciences, and the humanities. We draw on over a hundred academies, young academies and learned societies in more than 40 countries across Europe.

SAPEA is part of the European Commission's Scientific Advice Mechanism. Together with the Group of Chief Scientific Advisors, we provide independent scientific advice to European Commissioners to support their decision-making.

We also work to strengthen connections between Europe's academies and Academy Networks, and to stimulate debate in Europe about the role of evidence in policymaking.

Europe's academies draw on the best scientific expertise to provide independent, balanced and authoritative scientific advice. This approach makes SAPEA a critical source of evidence for policymakers and the wider public.

Our Academy Networks collectively represent over a hundred academies, young academies and learned societies across Europe. SAPEA works to strengthen these academies and provides a means for close collaboration in a unique and interdisciplinary way.

For further information about SAPEA, visit [www.sapea.info](http://www.sapea.info).

# Introduction

This document provides an overview on some of the main areas of action at EU level as regards sustainable food consumption. The primary aim is to identify legal acts and preparatory documents relevant to understanding policy development. It also seeks to broadly highlight some of the trends and challenges highlighted in the policy documents over the years.

The policy landscape shows how legislation on foodstuffs emerged from the need to harmonise national rules to establish an internal market and free movement of products. Concerns over product safety, public health and consumer protection were apparent from an early stage. In this context, consumer information became particularly relevant in legislative initiatives adopted over the years. Wider trends of EU integration also influenced relevant legislation. At the turn of the century, legislative consolidation and simplification was a clear focus of the European Commission, as were new topics such as sustainable development. The intersection of foodstuffs legislation with environmental considerations became more frequent and explicit over the last few years. The European Green Deal adopted by the European Commission in December 2019 sought to embed environmental and climate action across all policy fields, in an attempt to create synergies.

In accordance with the spirit of the European Green Deal, we acknowledge that sustainable food consumption is influenced by several policy areas, and relevant to several actions plans within that umbrella strategy. We recognise the importance of matters such as sustainable development and the circular economy, greenhouse gas emissions, industrial policy, the Common Agricultural Policy (CAP) and the Common Fisheries Policy (CFP), among others. Due to the complexity and depth of EU integration, it would be very difficult to produce and manage a comprehensive reflection on all those policy areas within the timeframe, resources, and writing space available for this document.

The backbone of this policy landscape is therefore the Farm-to-Fork Strategy and associated actions. It appears to be the first major attempt to comprehensively integrate environmental and climate targets across all food-related legislation. This approach was informed by the scoping paper and additional guidance provided by the European Commission's Unit RTD.02. The drafting of this document also took into account the work carried out by the working group and some the main aspects of their evidence review report. While the core of this narrative developed around the actions put forward by the Farm-to-Fork Strategy, other action plans and policies may still be mentioned in passing

## Introduction

---

whenever mentioned explicitly by the main policy documents or otherwise deemed relevant.

The narrative was developed from text analysis of legal acts and preparatory documents published by the co-legislators of the European Union. Particular focus was provided to preparatory documents made available by the European Commission, as to sole institution with powers of legislative initiative. We recognise that the legislative procedure may lead to changes and amendments potentially relevant to understanding different interests and priorities. However, we did not believe this would be the suitable place for such an in-depth analysis, considering the primary aim of the document.

Research was carried using the functionalities offered by the EUR-LEX database, the EU's main official resource of legislative information. Policy texts were screened for context and hints to other relevant policy documents. Search terms used for other literature reviewing work in the framework of the ERR were used to search in text. EuroVoc keywords were also used for searching in the database. Document identifiers have been added in the footnotes to facilitate access to relevant documents from all steps of policy procedure via EUR-LEX. The author can be contacted for further support in finding those documents.

# Foodstuffs, consumer protection and General Food Law

The approximation of rules between Member States on matters relating to foodstuffs started in the 1960s, on issues such as colourings<sup>1</sup>, preservatives<sup>2</sup> and antioxidants<sup>3</sup>. Harmonisation was deemed necessary to guarantee free movement of relevant products, but also to protect public health and shield consumers from falsification. In 1969, the Council decided to set up a Standing Committee on Foodstuffs to encourage cooperation between Member States and the Commission of the European Communities<sup>4</sup>. The expansion of related legislation continued in the 1970s for a number of other products and components, including sugars<sup>5</sup>. In April 1974, the Commission created a Scientific Committee for Food to advise on health and safety when it comes to the composition, manufacturing, characteristics, packaging and labelling of foodstuffs<sup>6</sup>. In the following year, the Commission set up an Advisory Committee on Foodstuffs, to allow representatives of the industry, consumers, agriculture, commerce and workers to participate in the policy-making process<sup>7</sup>. In the same year, the Commission tabled a proposal to limit the existence of erucic acid in oils and fats<sup>8</sup>, implementing advice from its Scientific Committee following reports on possible harmful effects of the consumption of rapeseed oil. The Council Directive was adopted in July 1976<sup>9</sup>.

---

1 Council Directive on the approximation of the rules of the Member States concerning the colouring matters authorized for use in foodstuffs intended for human consumption

2 Council Directive 64/54/EEC of 5 November 1963 on the approximation of the laws of the Member States concerning the preservatives authorized for use in foodstuffs intended for human consumption

3 Council Directive 70/357/EEC of 13 July 1970 on the approximation of the laws of the Member States concerning the antioxidants authorized for use in foodstuffs intended for human consumption

4 Council Decision 69/414/EEC of 13 November 1969 setting up a Standing Committee for Foodstuffs

5 Council Directive 73/437/EEC of 11 December 1973 on the approximation of the laws of the Member States concerning certain sugars intended for human consumption

6 Commission Decision 74/234/EEC of 16 April 1974 relating to the institution of a Scientific Committee for Food

7 Commission Decision 75/420/EEC of 26 June 1975 setting up an Advisory Committee on Foodstuffs

8 European Commission (1975) Proposal for a Council Directive fixing the maximum level of erucic acid in fats and oil and margarine for food (COM/1975/307)

9 Council Directive 76/621/EEC of 20 July 1976 relating to the fixing of the maximum level of erucic acid in oils and fats intended as such for human consumption and in foodstuffs containing added oils or fats

## Foodstuffs, consumer protection and General Food Law

---

In 1977, a proposal addressing consumer protection in the indication of prices of foodstuffs was put forward<sup>10</sup>. The Council Directive was formally adopted in June 1979 and it again focused on the final consumer, and did not include foodstuffs sold and consumed in the same location<sup>11</sup>. Throughout the following decade, existing legislation on foodstuffs was updated to account for the enlargement process and wider integration trends.

In July 1992, the Commission adopted its first proposal focusing on novel foods and novel food ingredients<sup>12</sup>. It was primarily tabled to eliminate national rules hindering the establishment and functioning of the EEC internal market. However, it also highlighted the environmental risks associated to genetically modified organisms (GMOs) by introducing a specific environmental risk assessment. The Regulation was eventually adopted in January 1997<sup>13</sup>. It foresees an active role for the Standing Committee on Foodstuffs. The concept of itself came to influence relevant legislation thereafter, which still identifies as novel foods any food not consumed to a significant degree by humans in the EU before May 1997, when the Regulation came into force.

In that same year, the European Commission unveiled its Green Paper on Food Law<sup>14</sup>. It recalls the growing volume of EU level legislation on foodstuffs, particularly as a result of the internal market programme and the progressive implementation of the Common Agricultural Policy (CAP). It also highlights that most national food legislation has been harmonised at Community level.

Specific legislation on sugars for human consumption suffered an update during the 1990s. A legislative initiative was tabled in May 1996 to simplify the framework, make it suitable for free movement of products in the internal market, and align it with other relevant legislation (such as food labelling)<sup>15</sup>. The Council Directive was adopted in December 2001<sup>16</sup>. A similar exercise was carried out for other products, such as honey.

---

10 European Commission (1977) Proposal for a Council Directive on consumer protection in the marking and display of the prices of foodstuffs (COM/1977/171)

11 Council Directive 79/581/EEC of 19 June 1979 on consumer protection in the indication of the prices of foodstuffs

12 European Commission (1992) Proposal for a Council Regulation (EEC) on novel foods and novel food ingredients (COM/1992/295)

13 Regulation (EC) No 258/97 of the European Parliament and of the Council of 27 January 1997 concerning novel foods and novel food ingredients

14 European Commission (1997) The general principles of food law in the European Union - Commission Green Paper (COM/1997/176)

15 European Commission (1996) Proposal for a Council Directive relating to certain sugars intended for human consumption (COM/1995/722)

16 Council Directive 2001/111/EC of 20 December 2001 relating to certain sugars intended for human consumption



In January 2000, the European Commission presented its White Paper on Food Safety<sup>17</sup>. It built on the consultation arising from an earlier Green Paper. It set out a number of actions seeking to guarantee the highest standards of food safety. It unveiled a comprehensive, integrated approach to regulating the food supply chain – from production to consumption – in what was named farm to table. Over 80 separate measures were included in the White Paper. They arose from the understanding that enormous developments had occurred in the methods of food production and processing, and that controls were required to ensure safety standards were met. It became clear that the EU legislative framework needed to be brought up to date. The risks associated with the contamination of foods – brought into focus by a recent dioxin crisis – were also highlighted. Scientific advice and consumer information were also part of the strategy, as was the international dimension. Consumer protection and human health were the ultimate priority.

In this context, the Commission tabled in November 2000 a draft Regulation laying down the general principles and requirements of food law. It proposed the establishment of the European Food Authority – which superseded the Standing Committee on Foodstuffs and absorbed the competences of the Scientific Committee for Food – and the establishment of relevant procedures in matters of food<sup>18</sup>. This piece of legislation – also known as the General Food Law – was eventually adopted by the co-legislators in January 2002<sup>19</sup>. The Regulation provides the basis for the assurance of a high level of protection of human health and consumers' interest in relation to food, taking into account in particular the diversity in the supply of food including traditional products. It establishes common principles and responsibilities, the risk analysis principle in EU food law, the means for an adequate science base, efficient organisational arrangements and procedures underpinning decision-making in matters of food and feed safety.

The White Paper on Food Safety also vowed to update and simplify existing legislation with regard to food additives. The draft law was tabled by the Commission in July 2006 to bring together all provisions concerning the authorisation and use of additives in foodstuffs, which includes colourings, sweeteners and flavourings<sup>20</sup>. The Regulation was adopted by the co-legislators in December 2008<sup>21</sup>.

---

17 European Commission (2000) White Paper on Food Safety (COM/1999/719)

18 European Commission (2000) Proposal for a Regulation of the European Parliament and of the Council laying down the general principles and requirements of food law, establishing the European Food Authority, and laying down procedures in matters of food (COM/2000/716)

19 Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

20 European Commission (2006) Proposal for a Regulation of the European Parliament and of the Council on food additives (COM/2006/145)

21 Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives

The White Paper included the intention to examine the application of the framework on novel foods. As a result of that assessment, the Commission adopted in January 2008 a draft law seeking to further develop and update the existing legislation<sup>22</sup>. Clarification was also required following the adoption of specific legislation for genetically modified food and feed<sup>23</sup>. However, discussions between the co-legislators were unsuccessful (particularly as regards animal cloning) and the proposed Regulation was later withdrawn by the Commission. A new draft law was tabled in December 2013, limiting its scope to the safety of novel foods<sup>24</sup>, and focusing on streamlining and simplifying the regulatory process. The Regulation was adopted in November 2015<sup>25</sup>.

In December 2011, the Commission tabled a proposal seeking to revise the framework on public procurement<sup>26</sup>. It was seen as one of the main tools to fulfil the objectives of the wider Europe 2020 strategy for growth, which included the promotion of a low-carbon, resource-efficient and competitive economy. The legislation revision aimed at encouraging wider use of green procurement. The Act was eventually adopted by the co-legislators in February 2014<sup>27</sup>. Specific green public procurement criteria for food were published by the Commission in September 2019<sup>28</sup>. These criteria aimed at, among others, increase the share of organic products, avoid food waste, promote an increased offer in plant-based menus, and avoid the consumption of fish and marine products from depleted stocks.

The Commission published in May 2012 its European Consumer Agenda<sup>29</sup>. Its focus lays on sustainability and consumer empowerment, seeking to strengthen their safety, information, education, rights, means of redress and enforcement. It highlights legislation on food information, and on nutrition and health claims as examples of high level provision of consumer protection and empowerment.

---

22 European Commission (2008) Proposal for a Regulation of the European Parliament and of the Council on novel foods and amending Regulation (EC) No XXX/XXXX [common procedure] (COM/2007/872)

23 Regulation (EC) No 1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed

24 European Commission (2013) Proposal for a Regulation of the European Parliament and of the Council on novel foods (COM/2013/894)

25 Regulation (EU) 2015/2283 of the European Parliament and of the Council of 25 November 2015 on novel foods, amending Regulation (EU) No 1169/2011 of the European Parliament and of the Council and repealing Regulation (EC) No 258/97 of the European Parliament and of the Council and Commission Regulation (EC) No 1852/2001

26 European Commission (2011) Proposal for a Directive of the European Parliament and of the Council on public procurement (COM/2011/896)

27 Directive 2014/24/EU of the European Parliament and of the Council of 26 February 2014 on public procurement and repealing Directive 2004/18/EC

28 European Commission (2019) EU green public procurement criteria for food, catering services and vending machines (SWD/2019/366)

29 European Commission (2012) A European Consumer Agenda - Boosting confidence and growth (COM/2012/225)

In May 2013, the European Commission adopted a draft law seeking to revise the legislative framework on official controls in place to ensure the correct application and enforcement of food and feed law across the agri-food chain<sup>30</sup>. It sought to overcome shortcomings on its wording and application, to simplify processes and reduce the administrative burden, and to strengthen the principle of risk-based controls. The co-legislators adopted the Regulation in March 2017<sup>31</sup>. The Act reinstates that organic and plant protection products are within its scope.

Later that year, the co-legislators adopted its CMO Regulation for the MFF 2014-2020 in the context of the Common Agricultural Policy (CAP)<sup>32</sup>, which included provisions for support to scheme seeking to improve access to food. It served as the basis for a draft law tabled by the European Commission in January 2014 for an aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments<sup>33</sup>. It was framed as an initiative to improve the distribution of agricultural products and children's eating habits. The Regulation was adopted by the co-legislators in May 2016<sup>34</sup>. The EU School Fruit, Vegetables and Milk Scheme entered into force in August 2017, and it merged previous EU-wide schemes – the School Milk Scheme dates back to 1968 (implemented in 1977), and the School Fruit Scheme became a political commitment of the 2007 CMO reform. The new scheme sought to address the declining consumption of those products, introducing economic and public health benefits and strengthening the educational dimension of previous schemes.

Following up on the publication of its Communication on the Circular Economy<sup>35</sup>, the European Commission also established the EU Platform on Food Losses and Food Waste (FLW) in 2016. It brings together national and supranational stakeholders together to define measures needed to prevent food waste, share best practice, and assess progress made over time. Following a first mandate concluded in 2021, the Platform was

---

30 European Commission (2013) Proposal for a Regulation of the European Parliament and of the Council on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health, plant reproductive material, plant protection products... (COM/2013/265)

31 Regulation (EU) 2017/625 of the European Parliament and of the Council of 15 March 2017 on official controls and other official activities performed to ensure the application of food and feed law, rules on animal health and welfare, plant health and plant protection products...

32 Regulation (EU) No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007

33 European Commission (2014) Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 1308/2013 and Regulation (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in the educational establishments (COM/2014/32)

34 Regulation (EU) 2016/791 of the European Parliament and of the Council of 11 May 2016 amending Regulations (EU) No 1308/2013 and (EU) No 1306/2013 as regards the aid scheme for the supply of fruit and vegetables, bananas and milk in educational establishments

35 European Commission (2015) Closing the loop - An EU action plan for the Circular Economy (COM/2015/614)

re-instated in 2022 in the framework of the Farm-to-Fork Strategy. One of the Platform's sub-groups focuses on consumer food waste prevention.

Facing reports of food of lower quality being sold in certain parts of the EU despite identical packaging and branding, the Commission tried to address the problem of dual quality of consumer in September 2017, when it published a set of guidelines on the application of EU food and consumer laws<sup>36</sup>. In April 2018, the Commission also adopted a New Deal for Consumers, introducing a fresh agenda focusing on consumer protection<sup>37</sup>. In this context, it proposed amendments to the Directive on Unfair Commercial Practices to strengthen enforcement, which were adopted in November 2019<sup>38</sup>. The New Deal also acknowledged the increasing demand for sustainable products, and urged action to raise awareness on the different EU labelling instruments (such as the EU organic label).

In April 2018, the Commission tabled a proposal seeking to revise certain elements of the General Food Law and other legislative acts addressing the food chain<sup>39</sup>. It responded to concerns over the transparency of scientific studies and the risk assessment in the agri-food chain. It also adopted a draft Directive concerning unfair trading practices across the food supply chain<sup>40</sup>. It recognised that affected businesses might be left without margin to invest in sustainable and climate-friendly production, or might feel pressured to compensate the lost margin by cutting corners when it comes to environmental and food safety legislation. The first proposal was adopted by the co-legislators in June 2019<sup>41</sup>, and the second in April 2019<sup>42</sup>.

In June 2018, the Commission proposed the establishment of a new Single Market Programme for the period 2021-2027<sup>43</sup>. The Programme broadly seeks to improve the functioning of the internal market, the competitiveness and sustainability of enterprises,

---

36 European Commission (2017) Commission Notice on the application of EU food and consumer protection law to issues of Dual Quality of products — The specific case of food (C/2017/6532)

37 European Commission (2018) A New Deal for Consumers (COM/2018/183)

38 Directive (EU) 2019/2161 of the European Parliament and of the Council of 27 November 2019 amending Council Directive 93/13/EEC and Directives 98/6/EC, 2005/29/EC and 2011/83/EU of the European Parliament and of the Council as regards the better enforcement and modernisation of Union consumer protection rules

39 European Commission (2018) Proposal for a Regulation on the transparency and sustainability of the EU risk assessment in the food chain (COM/2018/179)

40 European Commission (2018) Proposal for a Directive of the European Parliament and of the Council on unfair trading practices in business-to-business relationships in the food supply chain (COM/2018/173).

41 Regulation (EU) 2019/1381 of the European Parliament and of the Council of 20 June 2019 on the transparency and sustainability of the EU risk assessment in the food chain and amending Regulations (EC) No 178/2002, (EC) No 1829/2003, (EC) No 1831/2003, (EC) No 2065/2003, (EC) No 1935/2004, (EC) No 1331/2008, (EC) No 1107/2009, (EU) 2015/2283 and Directive 2001/18/EC

42 Directive (EU) 2019/633 of the European Parliament and of the Council of 17 April 2019 on unfair trading practices in business-to-business relationships in the agricultural and food supply chain

43 European Commission (2018) Proposal for a Regulation of the European Parliament and of the Council establishing the Programme for single market, competitiveness of enterprises, including small and medium-sized enterprises, and European statistics and repealing Regulations (EU) No 99/2013,

and consumer protection, for the management of expenditure in the area of plants, animals, food and feed. It covers, for example, activities for preventing food waste and food fraud, short supply chains and the implementation of information and awareness raising initiatives. The Act was adopted by the co-legislators in April 2021<sup>44</sup>

The Commission published in October 2018 a revised bioeconomy strategy<sup>45</sup>, placing food and nutrition security as the first objective. It highlights that food and farming systems account for about three quarters of the overall bioeconomy employment and about two thirds of bioeconomy turnover.

A further agenda focusing consumer protection was adopted in November 2020, already incorporating some of the principles laid out by the Farm-to-Fork Strategy.

---

(EU) No 1287/2013, (EU) No 254/2014, (EU) No 258/2014, (EU) No 652/2014 and (EU) 2017/826 (COM/2018/441)

44 Regulation (EU) 2021/690 of the European Parliament and of the Council of 28 April 2021 establishing a programme for the internal market, competitiveness of enterprises, including small and medium-sized enterprises, the area of plants, animals, food and feed, and European statistics (Single Market Programme) and repealing Regulations (EU) No 99/2013, (EU) No 1287/2013, (EU) No 254/2014 and (EU) No 652/2014)

45 European Commission (2018) A sustainable Bioeconomy for Europe: Strengthening the connection between economy, society and the environment (COM/2018/673)

# Labelling and nutrition

In 1976, the Commission adopted a draft Council Directive proposing harmonisation of rules relating to the labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer. It was regarded as a measure implementing the EEC's consumer protection programme, which had been adopted in 1975. The Act was eventually adopted in December 1978<sup>46</sup>. Ten years later, the Commission proposed a Council Regulation specifically on nutrition labelling<sup>47</sup>. Its focus was the establishment of the internal market and the growing public interest in the relationship between diet and health. Nutrition had been identified as a priority in the European Programme against cancer, adopted by the Council in 1986. Specific labelling was seen as a tool to increase public knowledge and allow the individual to make an informed choice. This Act was adopted by the Council in September 1990<sup>48</sup>.

In July 2003, the Commission adopted a draft law concerning nutrition and health claims made in commercial communications on foods<sup>49</sup>. It sought to complement existing legislation on labelling and nutrition labelling. It responded to the increasing complexity of food production, and the proliferation in number and type of claims on the labels of food. Harmonisation was required given the discrepancies as regards definitions and conditions across the European Union, introducing barriers to ensuring a high level of consumer and public health protection. The Regulation was adopted by the co-legislators in December 2006<sup>50</sup>.

In May 2007, the Commission published its strategy for an EU-wide approach to nutrition, overweight and obesity related health issues<sup>51</sup>. It highlights that the individual is ultimately responsible for their lifestyle, despite the relevance of their context, and that only a well-informed consumer is able to make rational decisions. It also argues that an optimal response can only be achieved by promoting both the complementarity and integration of different relevant policy areas and levels of action. It also points out that in many relevant

---

46 Council Directive 79/112/EEC of 18 December 1978 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer

47 European Commission (1988) Proposal for a Council Directive (EEC) on nutrition labelling rules for foodstuffs intended for sale to the ultimate consumer (COM/1988/489)

48 Council Directive 90/496/EEC of 24 September 1990 on nutrition labelling for foodstuffs

49 European Commission (2003) Proposal for a Regulation of the European Parliament and of the Council on nutrition and health claims made on foods (COM/2003/424)

50 Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods

51 European Commission (2007) White Paper on a Strategy for Europe on Nutrition, Overweight and Obesity related health issues (COM/2007/279)

areas the EU can only complement and optimise primary actions put forward at national and local level.

Legislation on labelling was subject to many amendments over the years. In March 2000, those changes were codified into a single Directive<sup>52</sup>, primarily for clarification. The Commission eventually tabled a proposal to update labelling rules in January 2008<sup>53</sup>. Importantly, it aimed at merging the existing framework on labelling and nutrition labelling. The Regulation was eventually adopted by the co-legislators in October 2011<sup>54</sup>. It provides the basis for the assurance of a high level of consumer protection in relation to food information, taking into account the differences in the perception of consumers and their information needs. This text applies to food business operators at all stages of the food chain, and to all foods intended for the final consumer.

The Commission published in May 2020 a report assessing the use of additional forms of expression and presentation of the nutrition declaration, on their effect on the internal market and on the advisability of further harmonisation of those forms<sup>55</sup>. It presents the main front-of-pack nutrition labelling schemes implemented or under development at EU level, as well as some of the scheme implemented internationally.

In February 2021, the Commission adopted a fresh approach to cancer prevention, treatment and care<sup>56</sup>. It addresses the need for health diets and sets out the intention to reduce the presence of carcinogenic contaminants in food. It highlights the fight against obesity and diabetes, which the Farm-to-Fork Strategy intends to address by reviewing the EU school fruit, vegetables and milk scheme. It mentions the front-of-pack nutrition labelling and the importance of informed food consumption, commercial communication on unhealthy food and drinks, and the promotion policy for agricultural products. It also points out an initiative on VAT rules allowing EU countries to make more targeted use of rates in the context of health promotion.

The Farm-to-Fork Strategy also foresees measures seeking to once again update the rules on food labelling to account for environmental and climate targets.

---

52 Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs

53 European Commission (2008) Proposal for a Regulation of the European Parliament and of the Council on the provision of food information to consumers (COM/2008/40)

54 Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004

55 European Commission (2020) Report from the Commission to the European Parliament and the Council regarding the use of additional forms of expression and presentation of the nutrition declaration (COM/2020/207)

56 European Commission (2021) Europe's Beating Cancer Plan (COM/2021/44)

# Organic farming

In December 1989, the Commission proposed the first piece of legislation focusing on organic production of agricultural products and related identification<sup>57</sup>. It focused on consumer protection and information. The Council Regulation was adopted in June 1991<sup>58</sup>. It provided a legal definition of organic production through production rules, and set out control and labelling requirements and rules for importing organic products.

The first EU-wide Action Plan focusing on organic production was adopted in June 2004<sup>59</sup>. It vowed to lay the basis for future policy development in the context of the Common Agricultural Policy (CAP). It recognised the dual societal role of organic farming – marketing, led and rewarded by consumer demand and concerns; land management, delivering public goods in terms of environment and rural development. It focused action on consumer expectations, on the integrity of inspection systems, and on the need for further research and technology. In this context, the Commission tabled a draft law to update rules affecting the sector in December 2005<sup>60</sup>. It sought to clarify its principles and objectives, and to simplify the legal framework. It covered not only the labelling of organic products but also organic production. The Regulation was eventually adopted by the Council in June 2007<sup>61</sup>.

In March 2014, the Commission adopted a new Action Plan to support growth in the organic farming sector<sup>62</sup>. Ensuring steady growth while maintaining consumers' trust was identified as the main challenge, and the credibility of organic production the most important element. Alongside it, a draft law was tabled to broaden the scope of existing legislation<sup>63</sup>. The Regulation was eventually adopted by the co-legislators in May 2018<sup>64</sup>.

---

57 European Commission (1989) Proposal for a Council Regulation (EEC) on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs (COM/1989/552)

58 Council Regulation (EEC) No 2092/91 of 24 June 1991 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs

59 European Commission (2004) European Action Plan for Organic Food and Farming (COM/2004/415)

60 European Commission (2005) Proposal for a Council Regulation on organic production and labelling of organic products (COM/2005/671)

61 Council Regulation (EC) No 834/2007 of 28 June 2007 on organic production and labelling of organic products and repealing Regulation (EEC) No 2092/91

62 European Commission (2014) Action Plan for the future of Organic Production in the European Union (COM/2014/179)

63 European Commission (2014) Proposal for a Regulation on organic production and labelling of organic products, amending Regulation (EU) No XXX/XXX of the European Parliament and of the Council [Official controls Regulation] and repealing Council Regulation (EC) No 834/2007 (COM/2014/180)

64 Regulation (EU) 2018/848 of the European Parliament and of the Council of 30 May 2018 on organic production and labelling of organic products and repealing Council Regulation (EC) No 834/2007



and entered into force in January 2022. It seeks to simplify labelling rules, reduce the administrative burden and the exemptions, strengthen the control system and the trade regime.

In the meantime, a new Action Plan was published in March 2021 focusing on the organic farming sector in the framework of the Farm-to-Fork Strategy.

# Farm-to-Fork Strategy

The European Green Deal was published in December 2019 to tackle environmental challenges and embed measures to fight climate change across all policy fields. A number of strategies were subsequently adopted to further set out specific contributions.

In this context, the European Commission adopted a Farm-to-Fork (Farm-to-Fork) Strategy<sup>65</sup> in May 2020. It seeks to accelerate the European Union's transition to a sustainable food system. The overall objectives include:

- Neutral or positive environmental impact;
- Climate change mitigation and adaptation to its impact;
- Reversing the loss of biodiversity;
- Ensuring food security, nutrition and public health;
- Preserving affordability of food while generating fairer economic returns, fostering competitiveness and promoting fair trade.

Alongside the strategy, the Commission also published a series of reports, among which an assessment on the implementation of Regulation (EC) No 1924/2006<sup>66</sup> and another covering the use of additional forms of expression and presentation of the nutrition declaration<sup>67</sup>.

Before that, in March 2020, the Commission published a new Circular Economy Action Plan<sup>68</sup>. It highlights that the food value chain is responsible for significant resource and environmental pressures, and that 20% of the food produced in the EU is lost or wasted. It hints at the creation of a target for food waste reduction as one of the measures of the then-forthcoming Farm-to-Fork Strategy.

In September 2020, the Commission adopted a Communication revising the EU's ambition in reducing greenhouse gas emissions by 2030<sup>69</sup>. The plan sustains that consumers must be encouraged to pick sustainable and healthy food and diets, as

---

65 European Commission (2020) A Farm-to-Fork Strategy for a fair, healthy and environmentally-friendly food system (COM/2020/381)

66 European Commission (2020) Evaluation of the Regulation (EC) No 1924/2006 on nutrition and health claims made on foods with regard to nutrient profiles and health claims made on plants and their preparations and of the general regulatory framework for their use in foods (SWD/2020/95)

67 European Commission (2020) Report regarding the use of additional forms of expression and presentation of the nutrition declaration (COM/2020/207)

68 European Commission (2020) A new Circular Economy Action Plan For a cleaner and more competitive Europe (COM/2020/98)

69 European Commission (2020) Stepping up Europe's 2030 climate ambition. Investing in a climate-neutral future for the benefit of our people (COM/2020/562).

this would help the agricultural and food sector to reduce emissions but also improve consumers' health, reduce food waste and reduce wider costs for society. It also highlights that emissions reduction stemming from changing consumer choices could be as relevant as any technical options available to reduce emissions in those sectors.

An updated consumer agenda was adopted by the Commission in November 2020<sup>70</sup>. It recalls some of the actions suggested by the Farm-to-Fork Strategy, in particular those aimed at reducing the environmental and climate footprint of food systems and at empowering consumers to make informed, healthy and sustainable food choices. It also highlights the importance of the digital transformation in consumer habits.

In December 2020, the Commission published a set of recommendations aimed at supporting Member States drafting their strategic plans in the framework of the Common Agricultural Policy (CAP)<sup>71</sup>. This Communication acknowledges that food consumption patterns in the EU are unsustainable from both health and environmental points of view, and that the food environment must support a dietary shift towards a more plant-based diet. It suggests that increasing added value of agricultural products may be harnessed through EU quality schemes, in light of increasing consumer awareness and demand for healthier and more sustainable products and production methods. It also points out that economic opportunities can stem from a better fit between agricultural production and changing consumer demands.

In February 2021, the Commission tabled a proposal introducing amendments to the framework on statistics on agricultural input and output<sup>72</sup>. It pointed out that access to high quality food requires regular statistics on the areas and production of various crops and on the animals and derived products. The connection between agriculture and the environment was also highlighted, underlying its importance to the Farm-to-Fork Strategy. The Act was adopted by the co-legislators in November 2022<sup>73</sup>.

A Communication on the rights of the child was tabled in March 2021<sup>74</sup>. It acknowledges the importance of a healthy diet and highlights that the increased availability and affordability of ultra-processed, unhealthy foods led to escalating overweight and obesity. In line with the Farm-to-Fork Strategy, the Commission urges food industry and

---

70 European Commission (2020) New Consumer Agenda Strengthening consumer resilience for sustainable recovery (COM/2020/696).

71 European Commission (2020) Recommendations to the Member States as regards their strategic plan for the Common Agricultural Policy (COM/2020/846).

72 European Commission (2021) Proposal for a Regulation of the European Parliament and of the Council on statistics on agricultural input and output and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009, (EC) No 1185/2009 and Council Directive 96/16/EC (COM/2021/37)

73 Regulation (EU) 2022/2379 of the European Parliament and of the Council of 23 November 2022 on statistics on agricultural input and output, amending Commission Regulation (EC) No 617/2008 and repealing Regulations (EC) No 1165/2008, (EC) No 543/2009 and (EC) No 1185/2009 of the European Parliament and of the Council and Council Directive 96/16/EC (Text with EEA relevance)

74 European Commission (2021) EU strategy on the rights of the child (COM/2021/142).

retail sectors to make healthy and sustainable food options increasingly available and affordable.

In the same month, a Communication setting out an action plan for the development of organic production was also adopted<sup>75</sup>. It reaffirms the key role of organic production and consumption, and it lays out the road to fulfill the Farm-to-Fork Strategy goal of achieving at least 25% of the EU's agricultural land under organic farming and a significant increase in organic aquaculture by 2030. It builds on previous work carried out at EU level on this front. This plan is organised along three axes that accommodate the structure of the food supply chain – production, processing, and retails and consumers.

In May 2021, the Commission tabled a Communication focusing on a new approach for a sustainable blue economy in the EU<sup>76</sup>. Growing consumer demand for low environmental footprint and short supply chains is again acknowledged, and so is the need to reward those efforts made by fishers and fish farmers to achieve product quality. The Commission also adopted a Communication setting out guidelines for a more sustainable and competitive aquaculture sector<sup>77</sup>. This guidance was designed *inter alia* to help consumers make an informed choice of sustainable aquaculture products and to ensure a level playing field in the EU. The document identifies scope for further sectoral diversification when it comes to attracting younger consumers, the use of quality schemes and labels, and the promotion of sustainable aquaculture as an example of local production linked to short food circuits. Sectoral competitiveness is largely seen as relying on social acceptance and recognition of the benefits and value of aquaculture activities and products. In this context, information and communication become a key element.

A Communication setting out a long-term vision for rural areas across the EU was adopted by the Commission in June 2021<sup>78</sup>. It highlights that evolving consumer demand for better quality, more sustainable and healthy food is able to generate fresh opportunities for farmers and the rural economy. It adds that the transition towards organic production methods, the development of short supply chains, local processing and innovative products, can contribute to strengthening the role of farmers and increasing their income.

---

<sup>75</sup> European Commission (2021) Communication on an Action Plan for the development of organic production (COM/2021/141).

<sup>76</sup> European Commission (2021) Communication on a new approach for a sustainable blue economy in the EU. Transforming the EU's Blue Economy for a Sustainable Future (COM/2021/240).

<sup>77</sup> European Commission (2021) Strategic guidelines for a more sustainable and competitive EU aquaculture for the period 2021 to 2030 (COM/2021/236).

<sup>78</sup> European Commission (2021) A long-term Vision for the EU's Rural Areas - Towards stronger, connected, resilient and prosperous rural areas by 2040 (COM/2021/345).

In the same month, the non-legislative EU Code of Conduct for Responsible Food Business and Marketing Practices was published<sup>79</sup>. This was seen as one of the first deliverables of the Farm-to-Fork strategy. Whereas it is not a legislative text, it sets out common aspirations and indicative actions which Farm-to-Fork stakeholders can voluntarily align, commit and contribute to in support of the transition towards sustainable food systems.

In October 2021, the co-legislators adopted legislative amendments aimed at tightening control over the use of antimicrobials by third countries operators exporting animals and products of animal origin to the EU<sup>80</sup>. The draft law – adopted by the Commission in March 2021<sup>81</sup> - highlighted the target set out by the Farm-to-Fork strategy to reduce by 50% the overall EU sales of antimicrobials used for farmed animals and aquaculture by 2030.

In November 2021, the Commission unveiled a Communication highlighting the contribution of the EU's competition policy to delivering on the green and digital transitions<sup>82</sup>. It argues that consumer preferences for sustainable products, services and technologies should be taken into account in the competition assessment, whenever appropriate. Among the outlined actions, the Commission suggests a new derogation from antitrust rules in relation to agricultural sustainability agreements, in the framework of the CAP reform. The measure was intended at supporting farmers to address pollution, climate change and other sustainability challenges.

In the same month, the Commission adopted a draft Regulation aimed at curbing deforestation and forest degradation driven by the EU<sup>83</sup>. The proposed rules aim to guarantee that products that EU citizens buy, use and consume on the EU market do not contribute to global deforestation and forest degradation. The Commission also adopted a Communication setting out a new strategy aimed at securing healthy soils across the EU<sup>84</sup>. The documents highlights that many business are increasingly committing to agro-

---

79 EU Code of Conduct for Responsible Food Business and Marketing Practices. A common aspirational path towards sustainable food systems

80 Regulation (EU) 2021/1756 amending Regulation (EU) 2017/625 as regards official controls on animals and products of animal origin exported from third countries to the Union in order to ensure compliance with the prohibition of certain uses of antimicrobials and Regulation (EC) No 853/2004 as regards the direct supply of meat from poultry and lagomorphs.

81 European Commission (2021) Proposal for a Regulation amending Regulation (EU) 2017/625 as regards official controls on animals and products of animal origin exported from third countries to the Union to ensure compliance with the prohibition of certain uses of antimicrobials (COM/2021/108).

82 European Commission (2021) Communication on a competition policy fit for new challenges (COM/2021/713).

83 European Commission (2021) Proposal for a Regulation on the making available on the Union market as well as export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (COM/2021/706).

84 European Commission (2021) EU Soil Strategy for 2030 – Reaping the benefits of healthy soils for people, food, nature and climate (COM/2021/699).

food and forestry production practices that respect and increase the health of soils. This is seen as supporting consumer awareness and addressing expectations by citizens and stakeholders concerning concrete results on soil health.

The co-legislators adopted in December 2021 a set of rules on the objectives to be pursued through support provided to the national strategic plans under the CAP and financed by EAGF and EAFRD<sup>85</sup>. While fully aligned with the 2020 Farm-to-Fork strategy, the draft law was adopted by the Commission in June 2018, as discussions on the EU's Multiannual Financial Framework (MFF) 2021-2027 and related talks on CAP reform unfolded. The CAP is seen as a vehicle to ensure food security, meaning access to sufficient, safe and nutritious food at all times. It is also seen as a tool to improve the response of the agricultural sector to new society demands on food and health, including sustainable agricultural production, healthier nutrition, animal welfare and reduction of food waste. Support should therefore be provided to farms in proactively adjusting their production according to market signals and consumers' demands.

In February 2022, the Commission adopted a Communication reaffirming the EU's commitment to champion decent work both within borders and around the world<sup>86</sup>. It reaffirms the interdependence between the EU and millions of workers worldwide through the supply chains, and the increasing focus of EU consumers on fair and sustainable production of goods. In the same month, a draft law was proposed concerning corporate sustainability due diligence<sup>87</sup>. It seeks to set out a horizontal framework to foster the contribution of businesses to the respect of human rights and environment in their own operations and through their value chains. The initiative is largely anchored on the European Green Deal and addresses concerns also highlighted in the Farm-to-Fork Strategy.

In the context of an Action Plan seeking to make sustainable products the norm<sup>88</sup>, the Commission tabled in the following month a draft Directive aimed at empowering consumers for the green transition through better protection against unfair practices and better information<sup>89</sup>. It also adopted a Communication setting out measures focusing on

---

85 Regulation (EU) 2021/2115 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP Strategic Plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD)

86 European Commission (2022) Communication on decent work worldwide for a global just transition and a sustainable recovery (COM/2022/66).

87 European Commission (2022) Proposal for a Directive of the European Parliament and of the Council on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937 (COM/2022/71)

88 European Commission (2022) Communication on making sustainable products the norm (COM/2022/140)

89 European Commission (2022) Proposal for a Directive amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and better information (COM/2022/143).

the intersection between food security – in response to rising food and input costs – and the objectives of the Farm-to-Fork strategy<sup>90</sup>.

The co-legislators adopted a Decision setting out the priorities for the eighth General Union Environment Action Programme (EAP)<sup>91</sup> in April 2022. One of its core aims is to promote environmental aspects of sustainability and reduce key environmental and climate pressures related to the EU's production and consumption in several areas, including the food system.

In June 2022, the Commission and the EU's High Representative for Foreign Affairs and Security Policy adopted a Joint Communication setting out the EU's International Ocean Governance agenda<sup>92</sup>. Among other priorities, the EU vows to engage in partnerships to address marine pollution and promote sustainable consumption and promotion. It also pledges to revise the EU's marketing standards for fisheries and aquaculture products to provide information to consumers and operators in the supply chain on sustainability aspects of EU and imported products.

In the same month, the Commission also published a report focusing on the application of EU health and environmental standards to imported agricultural and agri-food products<sup>93</sup>. This report had been requested by the co-legislators during the CAP negotiations in July 2021. It identifies actions that the EU is already taking at multilateral and bilateral levels, but also autonomously, to address global environmental concerns or citizen expectations with regard to imported agricultural and agri-food products.

The Commission also tabled draft amendments to the Farm Accountancy Data Network (FADN), which is to be turned into a Farm Sustainability Data Network (FSDN). It envisages to consider the environmental and social dimensions of the farming sector next to the economic one. This development was first laid out in the Farm-to-Fork strategy.

A draft Regulation focusing on the sustainable use of plant protection products was also adopted in June 2022<sup>94</sup>. It recalls the conclusions of the Conference on the Future of Europe, which highlighted the need to achieving safe, sustainable, just, climate responsible, and affordable production of food, respecting sustainability principles, the environment, safeguarding biodiversity and ecosystems, while ensuring food security.

---

90 European Commission (2022) Safeguarding food security and reinforcing the resilience of food systems (COM/2022/133)

91 Decision (EU) 2022/591 on a General Union Environment Action Programme to 2030.

92 European Commission & EEAS (2022) Setting the course for a sustainable blue planet - Joint Communication on the EU's International Ocean Governance agenda (COM/2022/28).

93 European Commission (2022) Report on the application of EU health and environmental standards to imported agricultural and agri-food products (COM/2022/226).

94 European Commission (2022) Proposal for a Regulation of the European Parliament and of the Council on the sustainable use of plant protection products and amending Regulation (EU) 2021/2115 (COM/2022/305)

## Farm-to-Fork Strategy

---

Citizens have also asked the EU to protect and restore biodiversity, the landscape and oceans, and eliminate pollution, as well as to take measures to promote and guarantee a more ecological and climate-oriented agriculture. It delivers on the Farm-to-Fork strategy aims on the use of chemical pesticides to achieve a fair, healthy and environmentally-friendly food system, and to improve the position of farmers in the value chain.

The Commission published its strategy for a sustainable algae sector in November 2022. It follows up on the understanding in the Farm-to-Fork strategy that algae can be an important source of alternative protein for sustainable food system and global food security. In this context, the Commission intends to raise the sustainability profile of algae-based produces in the EU sustainable food labelling framework, including in marketing standards for fisheries and aquaculture products and green public procurement initiatives.

In February 2023, the Commission adopted a Communication setting out its strategy to strengthen the contribution of the Common Fisheries Policy to the wider environmental objectives championed by the European Green Deal<sup>95</sup>. The sustainability of the food systems are at the core of this Action Plan, seeking to conciliate climate and biodiversity with the practices of the fisheries and aquaculture sector. It was adopted as part of a package of strategies seeking to address sectoral resilience and sustainability.

Planned initiatives on front-of-pack nutrition labelling, date marking and food waste are yet to be unveiled by the Commission. The same applies to a revision of the EU's school fruit, vegetables and milk scheme, and to a framework for sustainable food systems.

---

<sup>95</sup> European Commission (2023) EU Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries (COM/2023/102).





SAPEA is part of the European Commission's Scientific Advice Mechanism, which provides independent, interdisciplinary, and evidence-based scientific advice on policy issues to the European Commission.

SAPEA has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement no. 737432.



[www.sapea.info](http://www.sapea.info)  
@SAPEAnews