



Building a healthy, sustainable, and just EU food system.

EU Policy Action Brief guided by EAT-Lancet science, based on the contributions from 90+ EU food system stakeholders.



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Europe's food system has real strengths to build on: it feeds nearly 450 million people to some of the highest safety standards in the world, sustains a rich food culture, and rests on deep agricultural, industrial, and research capacity.

It simultaneously faces major challenges. Poor diets high in salt, sugar and fat are a leading driver of preventable diseases such as cardiovascular disease, obesity, and diabetes, causing 800,000 deaths a year; farm incomes are squeezed by volatile prices of fertiliser and fuel; planetary boundaries are being crossed at a cost above €50 billion a year; and dependence on imported inputs, like feed protein, leaves supply chains exposed to shocks.

These challenges are deeply interconnected, and the food system sits at the heart of them. It is both a primary cause and the single most effective place to act. The EU is well placed to lead that response and the science sets out a direction.

The 2025 EAT-Lancet Commission provides a scientific vision, definitions and guardrails for healthier, more sustainable and more just food systems, and points towards the need for progress across three pillars i) sustainable production, ii) healthy consumption guided by the planetary health diet (PHD), and iii) reduced food waste and loss.

More alignment with EAT-Lancet can result in multiple benefits for the EU. Including (not limited to) the reduction of deaths caused by poor diets, reducing related healthcare system costs, reducing AMR risk in line with EU One Health objectives, increasing supply chain resilience and strategic autonomy, improving access and affordability of healthier and more sustainable food for consumers, rewarding farmers through income stream diversification and incentivise sustainable farming practices, and improving the state of biodiversity and the environment.

The science is clear. **What is missing is not knowledge, but the political alignment needed to turn knowledge into action.** This EU Policy Action Brief aims to contribute to that work. With recommendations straight from the value chain actors themselves: Through six Communities for Action (CfAs), more than 90 organisations from across the food value chain, including farmers, retailers, manufacturers, food services, consumers, cities, and public health actors, identified shared priorities for a healthier, more sustainable, and more just food system.

Despite their different starting points, the CfAs found overlapping interests, demonstrating that meaningful policy change is both needed and achievable. The overlapping interests are grouped into six mutually reinforcing policy packages:

1 Value Chain Development – Strengthen sustainable production and consumption of healthier and more sustainable foods, reduce food waste and loss, and enable better cross-value collaboration.

2 Fiscal and Economic Support – Support farmers and other actors' transition and improve food affordability and food environments.

3 Public Procurement – Encourage public institutions to procure healthier, more sustainable, and more just food, to create stable demand and market confidence.

4 Information, Transparency, and Trust – Create clear and consistent rules on labelling, advertising, and campaigns to inform choices.

5 Research, Innovation, and Knowledge Sharing – Invest in research, innovation, knowledge sharing, and pilots that speed up food system adaptation.

6 Trade and Market Rules – Ensure fair trading practices in the EU single market, align imported products with EU social and environmental standards, and harmonise fortification rules.

These six policy packages function as a flywheel: the packages reinforce each other, and momentum in one area makes subsequent policy action easier and more impactful.

Across all six Communities for Action, one consistent message emerges: They are ready to act, and are making progress, but

they call for coherent, aligned, and cross-sectoral EU policy action across all levels, especially political families, European Commission Directorates-Generals (DGs), and Member States. They need a policy environment that enables them to do more, including incentives, removal of structural barriers, enabling standards, coherent rules, public investment and institutional legitimacy.

Specifically, the CfAs are calling on the EU institutions to:

Set the direction. Introduce an EU Action Plan for a healthy, sustainable, resilient, and just food system, with clear Commission ownership, integrated objectives, voluntary targets, and budget tied to production, consumption, processing, and food-loss reduction. Serving the EU's wider goals of competitiveness and strategic autonomy and making sustainable business cases for farmers.

Deliver it coherently. Act on the identified policy packages across European Commission Directorates-Generals, political families, and Member States together. Embedding EAT-Lancet objectives across Commission DG mandates and starting where the conditions for action and potential impact are strongest.

Keep the communities at the table. Involve the Communities for Action, alongside scientists and wider food system actors, in the design, delivery, and monitoring of these policies. Recognising that the legitimacy, durability, and effectiveness of coherent EU food policy depend on sustained engagement with the full breadth of actors who shape what Europeans grow, sell, prepare, and eat.

There is a broad coalition of actors that translated science into policy unlocks to deliver real-life impact. **What is needed now, is the political leadership to take action together.**

SECTION 1

The opportunities of a healthier, more sustainable, and more just food system

1.1 Context of the current EU Food System

Europe's food system has real strengths to build on. It feeds nearly 450 million people to some of the highest safety standards in the world. It sustains a wide diversity of regional and quality products, a living food culture, and rural communities whose knowledge and stewardship shape much of the landscape. There are a wide variety of strengths, and knowledge in the entire system from policy to plate, to identify and implement the needed adaptations to the system.

That same food system is also under growing strain. These pressures are no longer passing shocks; they are structural, and they compound one another:

- **Public health.** Diets high in salt, sugar, and unhealthy fats drive a rising burden of non-communicable disease and an estimated 800,000 Europeans die due to poor diets (1). Moreover, anti-microbial resistance risk linked to food systems is identified as a top 3 public health risk, causing 35,000 deaths due to infections from antibiotic-resistant bacteria (2).
- **Affordability and equity.** Rising living costs, including food prices cause food poverty and are widening social inequalities, while too many Europeans live in food swamps and food environments that encourage

unhealthy food choices (3).

- **Farmer viability.** Volatile energy, feed, and fertiliser costs continue to squeeze farm incomes and erode confidence to invest (4).
- **Environment.** Biodiversity loss, pesticide runoff, soil and water degradation, and climate pressure are mounting, with the EU transgressing multiple planetary boundaries at a cost estimated above €50 billion a year (5,6,7).
- **Resilience and autonomy.** Dependence on imported inputs, nitrogen, fertiliser, and feed protein in particular, leaves regional supply chains exposed to environmental, climate and geopolitical shocks (8).

These pressures are interconnected, and the food system sits at the centre of them, which is also why it is the most powerful lever for addressing them. Changing how Europe produces, processes, distributes, consumes, and recovers food is a practical response to risks the EU already carries.

EU policy action is needed to support Europeans to produce food more sustainably and to eat more healthily. With major policy and budget files now in negotiation, there is a clear reason to act. This EU Policy Action Brief sets out priorities for policy action, based on the collective contributions more than 90 food system actors from across the EU (see Appendix A).

1.2 The 2025 EAT-Lancet Commission science and its benefits for the EU

The EAT-Lancet Commission was established to provide comprehensive scientific guidance on healthy diets that stay within planetary boundaries and are socially just. To date, the EAT-Lancet Commissions (2019 and 2025) delivered comprehensive global scientific evaluations of food systems to answer:

- What constitutes a healthy dietary pattern?
- What are the safe boundaries for food within the Earth system?
- What are the social foundations of just food systems?

The central finding of the **2025 EAT-Lancet report** (9) is straightforward and useful for policy: progress depends on movement across three fronts i) more sustainable production, ii) healthier consumption, and iii) reduced food waste and loss. On consumption, the EAT-Lancet Commission translates the health evidence into the Planetary Health Diet (PHD), a flexible dietary guideline which accommodates omnivorous, flexitarian, pescatarian, vegetarian, and vegan

diets, and it is adaptable across food cultures rather than overriding them. The PHD is built exclusively on health criteria; that it also eases environmental pressure and widens access to healthier and more sustainable food is a consequence of eating well, not a separate agenda.

For the average European diet, moving towards the PHD means eating more of what is currently under-consumed (vegetables, fruits, legumes, pulses, nuts, seeds, and whole grains) and rebalancing intake of foods consumed in excess, including those high in sugar and salt and, on average, red and processed meat. The PHD is translatable to existing regional diets in Europe, and many traditional dishes already sit comfortably within it. The PHD has informed recent revisions of national dietary guidelines in several Member States, although a gap remains between current guidelines and everyday eating (10).

The EU is well-positioned to unlock the significant benefits of shifting its food system towards an EAT-Lancet aligned one. They are concrete and fall along the same three lines the brief returns to throughout.

- **A healthier Europe:** European quality of life will increase by making nutritious diets more affordable, and convenient, all while



reducing the burden of diet-related non-communicable diseases and the costs that follow. At the same time, reducing antibiotic use in farming will address the growing threat of antimicrobial resistance, responsible for over 35,000 deaths and costs of nearly EUR 11.7 billion annually in the EU/EEA area (11).

- **A more sustainable Europe:** more diversified, resilient production with less food waste and loss would bring the system back within safe environmental limits, while reducing dependence on imported inputs (e.g., fertiliser, feed, and energy)

strengthens strategic autonomy and dampens the price volatility that destabilises the whole food value chain.

- **A more just Europe:** steadier input costs and new income streams from protein-rich crops and other nutritious staples would support farm viability and rural livelihoods, while wider access to affordable, sustainably grown, healthy food would narrow the inequalities that shape Europeans' ability to eat well. Lastly, shifting the food system within safe environmental boundaries provides benefits to current and future generations.

1.3 The EU Policy Action Brief: Method, stakeholders and process

This EU Policy Action Brief aims to provide an answer to the question: what EU policy unlocks are needed to move towards a healthier, more sustainable and more just EU food system? Guided by EAT-Lancet science, based on the contributions from EU food system stakeholders.

Building on an earlier global process (12), the convening organisations (13) brought together actors from across the food value chain into six “Communities for Action” (CfAs): farmers, retailers and manufacturers, food services, consumers, cities, and public health actors (see Appendix A). Their role was to identify the policy unlocks that would help their own ambition towards building a healthier, more

sustainable, and more just food system. This was done across the full chain, from research and farming through processing, markets, and demand. Through a structured dialogue series, each community developed its own list of policy unlocks (Appendix B). These were then analysed to find where they converge: the overlaps where actors with very different starting points are asking for the same thing.

This EU Policy Action Brief focuses on the areas where convergence is strongest, to highlight where the greatest policy momentum exists for food system adaptation.



Our Communities

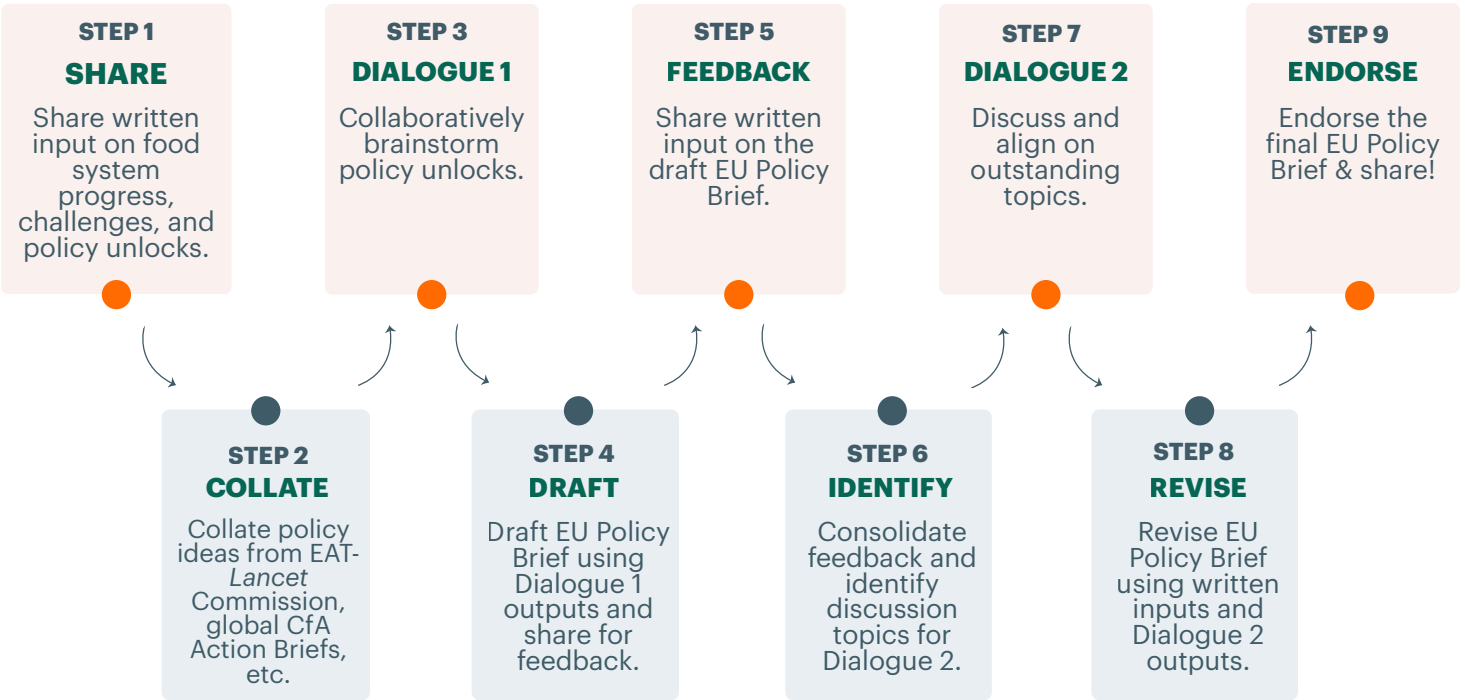
Key stakeholders represented across the food system ecosystem.



Our Process

A chronological, co-creative community dialogue series led to the development of this brief.

Community for Action Activities Organising Committee Activities





2.1 Topline insights based on where the communities for action converged

Across all six Communities for Action, one consistent message emerges: They are ready to act, and are making progress, but they call for coherent, aligned, and cross-sectoral EU policy action across all levels, especially the political families of the EU Parliament, European Commission Directorates-Generals (DGs), and Member States.

Alignment across policy areas, on all levels in the EU, is needed to enable more positive progress and deliver benefits to actors across the interconnected food system. Farmers can shift their production systems provided there is reliable, long-term market demand and economic support. Consumers can make healthier choices with a food environment that makes those choices more accessible, affordable, and transparent. Food manufacturers and retailers can innovate more meaningfully with regulatory coherence, stable consumer demand, and predictable and enabling environments. Cities can lead public procurement reform with EU standards that give them the mandate and confidence to act on their ambitions. Food services can provide healthier and more sustainable meals and avoid food waste and loss better when public procurement rules and food waste regulations and other policies align.

regulations and other policies align.

Lastly, public health actors can more effectively reduce disease burden when policies across food, health, and education are coherent and mutually reinforcing.

Based on the convergence between policy unlocks that were identified by the CfAs (Appendix B), a pattern emerged, which can be grouped into the following six policy packages:

1 Value Chain Development

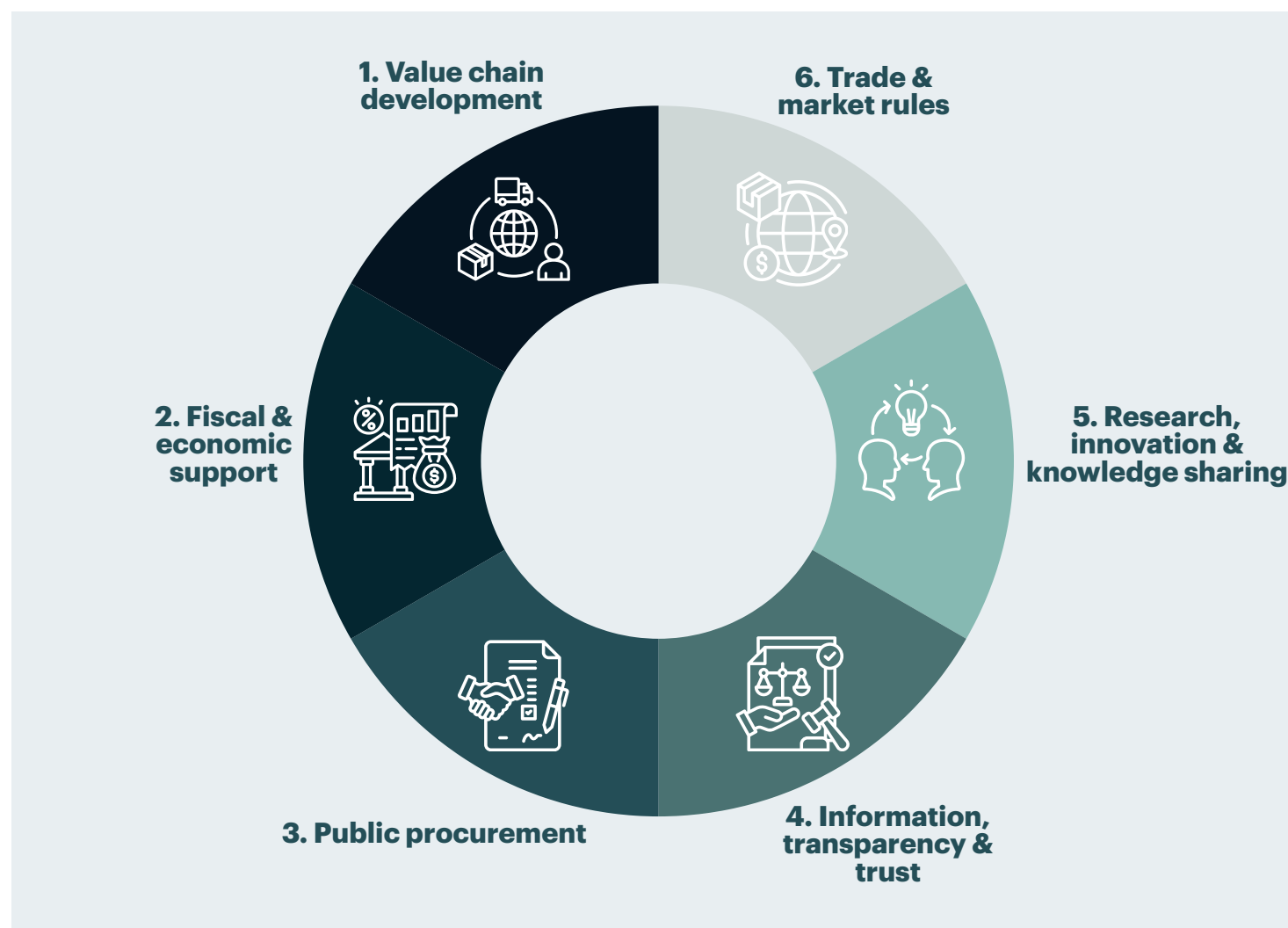
2 Fiscal and Economic Support

3 Public Procurement

4 Information, Transparency, and Trust

5 Research, Innovation, and Knowledge Sharing

6 Trade and Market Rules



The six policy packages do not function as isolated silos. They form a flywheel: each lever reinforces the others, and momentum in one area accelerates progress across the EU food system. For example, value chain development and public procurement give policy signals and create an increase in demand that justify product investment and innovation. Fiscal incentives and economic support close financial gaps that demand increases alone cannot. Transparent information helps to build consumer confidence that manufacturers, retailers and food services need. Trade and market rules, as well as governance and collaboration structures ensure that these policy benefits happen coherently, with actors along the whole food system value chain, such as farmers, businesses, city, and civil society representatives collaborating around shared goals and harmonised rules.

2.2 Six policy packages

Below, each policy package is further detailed with a reference to the CfAs that identified them, and areas for further dialogue. The latter is an indication of where tensions exist within the converging topics, and where more time should be spent to map insights and ways forward.

Policy Package 1: Value Chain Development

Healthy, sustainable and just food only scales when the whole chain effectively collaborates and holds together. This package strengthens that chain on three fronts: building the value chains for the foods Europe needs more of, cutting the food lost along the way, and enabling better collaboration.

A. Strengthen Value Chains – Introduce EU objectives, roadmaps, voluntary targets with monitoring of progress, and Member State guidance to strengthen value chains of healthy, just, and sustainable food products.

- **Outcome:** Value chains for food categories that play a larger role in PHDs (e.g., vegetables, legumes, fruits, and nuts) receive stronger policy support across the full chain, from farming to processing and retail. For food categories that are part of PHDs in smaller quantities (e.g., animal-sourced products), support is given to transition towards more sustainable production. Together, this drives an overall increase in the sustainable production, availability and consumption of nutritious and sustainable food, more aligned with PHD recommendations and planetary boundaries.
- **Identified based on converging CfA policy unlocks of:** Retail & manufacturers, Food services, Consumers, and Public health actors.
- **Area for further dialogue:** i) Which value chains to prioritise first? ii) How to ensure production matches consumption?

B. Food waste and loss reduction – Ensure the effective implementation of existing legally binding targets for food waste reduction and support side stream valorisation innovation.

- **Outcome:** An EU food system with reduced food waste and loss across the whole value chain, due to valorisation of side streams and the liability-safe donation of unavoidable food waste. Creating a more circular, food secure and resource-efficient food system.

- **Identified based on converging CfA policy unlocks of:** Farmers, Retail & manufacturers, Cities, and Food services.

- **Area for further dialogue:** i) While acknowledging that food waste reduction targets are already part of the Waste Framework Directive (WFD), how can other policies support achieving these targets? E.g. reducing on-farm food losses (like non-harvested products, which are currently out of scope of the Directive) by updating of market standards, or infrastructure investments for side stream valorisation. Or other food waste prevention on consumer level?

C. Cross-Value Chain Collaboration – Introduce and/or improve enabling environments for cross value chain collaboration platforms and tools.

- **Outcome:** Structural measures that determine how actors across the food system organise, cooperate, and share risk, and ownership are in place. This includes multi-stakeholder coordination mechanisms, producer organisations, and cooperatives, multi-year contracts and (pre-competitive) data sharing along the value chain, and cross-sector collaboration platforms. Public-private partnerships co-design and pilot solutions while drawing on good practice examples from existing initiatives. Governance structures reflect both the collaborative potential and the conflicts of interest and trade-offs inherent in cross-value chain relationships, enabling a more equitable and resilient food system where benefits, responsibilities, and risks are shared across actors.
- **Identified based on converging CfA policy unlocks of:** Farmers and Food services.

- **Area for further dialogue:** i) Which type of data is most important to share across the value chain? ii) What conditions and governance arrangements should govern data platforms? iii) Risk-sharing mechanisms and iv) the current gap in EU financing schemes designed for cross-value chain collaboration need further attention. v) The role of public policy in defining what forms of collaboration are encouraged, permitted, or restricted also remains to be clarified.

Policy Package 2: Fiscal & Economic Support

Doing the right thing has to be affordable and in reach for both farmers making the transition, and for the actors shaping what food costs and how it is offered. This package works on two fronts: backing the production transition and aligning financial incentives to create food environments where healthier and more sustainable foods are the easiest options.

A. Subsidies and (Co-)Financing - Agricultural subsidies to further support ecosystem regeneration, and a just transition towards sustainable farming practices.

Outcome: Ecosystems are actively regenerated by farmers as they obtain support from a policy environment in which action- and outcome-based payments are linked to environmental, social, animal welfare,

and public health indicators. Farmers and food producers (including small-scale producers, tenants, and land stewards) have access to transition grants, co-financing and de-risking mechanisms, technical training, stranded asset regulation, and fair land access conditions to support generational renewal and the transition towards sustainable and regenerative practices across horticulture, arable, and animal-based farming systems. This contributes to an EU food system operating within planetary boundaries and One Health principles, while supporting biodiversity, resilient rural livelihoods, animal welfare, and reduced AMR risk.

- **Identified based on converging CfA policy unlocks of:** Farmers, Public health actors, Food services, and Retail & manufacturers.
- **Area for further dialogue:** i) How to best measure, report and reward action- and outcome-based payments, also considering factors beyond farmers' control (e.g., weather) and ensuring proportionality across different farming contexts. ii) How can the transition from conventional to more sustainable and regenerative production models be best facilitated to ensure they are economically viable and just for farmers and value chain actors? E.g., Providing transition support and fair risk-sharing to create economically viable pathways. Lastly, iii) public health actors call for strengthening existing commitments on reducing antibiotics use in agriculture and AMR risk. E.g., make reduction targets more enforceable, and/or through introducing CAP-linked incentives.



B. Financial incentives – Introduce EU guidance to align financial incentives to create food environments that offer healthy, just and sustainable food.

- **Outcome:** Food manufacturers, food service actors, public institutions, and other food system actors are financially incentivised and rewarded (e.g., through price signals, co-financing, subsidies, public procurement incentives, reporting frameworks, and fiscal measures) to create food environments that have a larger share of more healthy, sustainable, and just food for consumers.
- **Identified based on converging CfA policy unlocks of:** Consumers, Public health actors, Food services, Retail & manufacturers, and Cities.
- **Area for further dialogue:** Acknowledging that the theme of fiscal incentives is broad i) which interventions should be prioritised? Moreover, ii) when are VAT and other taxation differentiation measures effective to encourage healthier, more sustainable and more just foods consumption? While there is WHO guidance, the retail & manufacturing community nuanced that VAT reductions do not always lead to lower consumer prices or shifts in consumption patterns. Lastly iii) how can EU fiscal regimes be more harmonised and coherent to strengthen the EU single market?

Policy Package 3: Public Procurement

This is the one policy package that came up in every community. Farmers, consumers, public health actors, retailers and manufacturers, cities, and food service all identified public procurement as a priority. This is the clearest point of agreement and opportunity for action.

A. Public Food Procurement – Introduction of voluntary criteria based on PHD

- **Outcome:** Public canteens, such as schools, hospitals, offices, prisons, and elder care homes, serve balanced, healthier, more sustainable, and diverse meals aligned with the EAT-Lancet PHD principles. Public procurement frameworks support concrete and measurable criteria related to nutrition, sustainability, seasonality, responsible production practices, and menu composition, while remaining sufficiently flexible to reflect different national and local contexts. This contributes to shaping healthier food environments, and food literacy by demonstrating what healthy and sustainable diets look like in practice.
- **Identified based on converging CfA policy unlocks of:** All six CfAs.
- **Area for further dialogue:** i) How to best allow for the benefits of locality and regional development whilst prioritising health, and sustainability criteria? Taking into account that “local” sourcing cannot legally function as a standalone procurement criterion under EU single market rules. A constructive way forward could be to establish clear minimum nutrition and sustainability standards as primary procurement criteria (including seasonality and responsible production standards) while allowing flexibility for additional contextual criteria where appropriate. Further dialogue is also needed on ii) how procurement frameworks can remain ambitious yet feasible across different national, regional, and budgetary contexts (JRC guidance), and on iii) how public procurement can better support collaboration across food system actors, including farmers, retailers, manufacturers, and food service providers.



Policy Package 4: Information, Transparency & Trust

People can only choose well when the food environment gives them honest, consistent information and when the rules are the same across the EU single market. This package works on three fronts: what is on the label, what is advertised, and what public campaigns promote.

A. Labelling - Introduce and/or harmonise nutritional and environmental food labelling.

- **Outcome:** Consumers have trustworthy information on the health and sustainability criteria of food products, based on which they can make more informed choices on what to eat. Additionally, improved harmonisation across the EU results in easier and more cost-effective alignment for the manufacturing and retail sector.
- **Identified based on converging CfA policy unlocks of:** Consumers, Public health actors, Retail & manufacturers, and Cities.
- **Area for further dialogue:** i) How could harmonisation of nutritional and environmental labelling be implemented in practice? Acknowledging that there are ongoing discussions (14) that can be built upon, questions that need solving, and lessons to be made from the past. E.g., Which labels will be used? Which labels are voluntary versus mandatory?

Which calculation methods are used? What can be learned from Nutri Score discussions of the past?

B. Advertisement - Introduce and/or harmonise advertisement restrictions of unhealthy food products

- **Outcome:** Harmonised advertisement rules that restrict the advertisement of unhealthy products (e.g., food products high in saturated fats, salt and sugar (HFSS)) towards vulnerable populations, especially children, in the physical environment, and across digital platforms including influencer marketing and algorithm-driven content.
- **Identified based on converging CfA policy unlocks of:** Consumers, Public health actors, and Cities.
- **Area for further dialogue:** i) Which advertisement interventions should be considered? Acknowledging there is [WHO guidance](#), and ii) How to translate this into concrete policy and ensure effective implementation and enforcement?

C. Food literacy & Food promotion campaigns - Further strengthen EU-funded campaigns promoting healthy and sustainable foods

- **Outcome:** EU food campaign budgets and information campaigns support quality European agri-food products, build consumers' food literacy and guide consumers towards healthier, more balanced diets and more sustainable food choices.
- **Identified based on converging CfA policy unlocks of:** Cities, Public health actors, Retail & manufacturers, and Food services.
- **Area for further dialogue:** i) How to coordinate with Member State campaigns for consistent messaging?

Policy Package 5: Research, Innovation & Knowledge Sharing

A more resilient food system depends on better tools and better knowledge and on making sure both reach the people who can use them. This package works on two fronts: investing in the research and innovation that makes change possible, and closing the gap between what is known and what is practised.

A. Research & Innovation (R&I) - Co-finance R&I to strengthen vegetables, fruits, legumes, whole grains, nuts, seeds, and sustainable plant- and animal value chains.

- **Outcome:** Food value chains and markets are more resilient and developed through circularity innovations, as well as through the introduction of more profitable and (climate) resilient crops, more sustainable animal rearing practices, better processing equipment and techniques, healthier ingredients, improved taste and market access, and a better investment climate for healthier, more sustainable, and more just plant-, animal food products, addressing population nutrient gaps and strengthening the evidence base on health, environmental, and economic benefits.

- **Identified based on converging CfA policy unlocks of:** Retail & manufacturers, and Farmers.

- **Area for further dialogue:** i) Which R&I investments to prioritise and from which public funding platforms (e.g. Food 2030, FP10, Agri2040, EIT Foods, CBE-JU, Member state initiatives, etc)

B. Knowledge and Education – Improve access to knowledge and education

- **Outcome:** Better access to education for food system actors across the value chain is in place. E.g., Farmer peer-to-peer learning and demo sites exist based on operational farm lighthouses and living labs, advisory services, and training through producer organisations, including documented business cases from EU projects such as Horizon Europe. Improved curricula for medical and healthcare professionals and private and public chefs exist, enabling them to act on food and nutrition evidence and illness prevention. Promotion of youth education and improved curricula on healthy and sustainable diets within primary and secondary school systems are in place.
- **Identified based on converging CfA policy unlocks of:** Farmers, Public health actors, and Food services.
- **Area for further dialogue:** i) How to best work together with the different tools available to Member States on this?

Policy Package 6: Trade & Market Rules

The rules of the market decide whether high standards are an asset or a disadvantage. This package works on two fronts: an EU single market and trade framework that rewards rather than penalises responsible production, and product rules that make the healthier and more sustainable option the easier one to make and sell.

A. Trade - Strengthen single market rules, fair trading practices, alongside workable implementation of corporate sustainability and due diligence rules around social and environmental standards.

- **Outcome:** Fair competition due to harmonised social and environmental standards and a level playing field in EU food supply chains (both domestically and at international trade), supporting fairer value distribution for farmers and other suppliers to produce with high standards, and industry and consumers having access to food products with high standards. Ensuring fair-trading practices to reward social and environmental practices in food supply chains.
- **Identified based on converging CfA policy unlocks of:** Farmers, Consumers, Food services, and Retail & manufacturers.
- **Area for further dialogue:** Acknowledging that trading practices, single market rules, and foreign trade agreements are under constant revision, this policy unlock is an encouragement for i) a constant dialogue to ensure effective alignment, implementation, enforcement, and revisions.

Especially in the light of the current EU strategy to seek and conclude on international trade agreements.

B. Reformulation Rules - Incentivise and harmonise rules around product reformulation and fortification to improve the nutritional profiles of food products.

- **Outcome:** Consumers have access to appealing and tasty healthy foods, and manufacturers have a harmonised internal market and level playing field.
- **Identified based on converging CfA policy unlocks of:** Consumers, Public health actors, and Retail & manufacturers.
- **Area for further dialogue:** i) Ongoing debate between consumers and public health professionals who demand mandatory reformulation rules on food high in saturated fats, sugar, and salt (HFSS), whereas food manufacturers & retail request incentives. Actors in the CfAs agree to ensure that reformulation guidance is science-based, and with the goal to guide consumers towards well-balanced diets more in line with the PHD.



SECTION 3

Conclusion and calls to action

Europe stands at a pivotal moment.

Geopolitical tensions, food supply chain shocks, food poverty, rising diet-related illnesses, climate disruption, biodiversity loss, environmental- and soil degradation make the adaptation of our food system a strategic imperative that can deliver multiple benefits. Europe has the agricultural knowledge, the institutional infrastructure, the economic power, the research capacity, and the civic engagement to make its food system better.

The science has been clear for years and has set out, in detail, what a healthier, more sustainable, and more just food system requires.

The gap is not about knowledge. It is about political alignment to act on what is already well understood to build a food system that is healthy, just, and sustainable. That is what this EU Policy Action Brief offers.

Six communities often assumed to be at odds – farmers, consumers, retail and manufacturers, public health professionals, cities and food services – started from their own positions and converged on overlapping ideas. Where actors with such different interests converge, reforms become politically possible as they are carried by a coalition broad enough to support them.

These communities are already acting, by investing in new practices, reformulating products, redesigning menus,

building resilient supply chains and educating themselves and others. **What they are asking for is an EU policy environment that supports their efforts:** one that aligns incentives, removes structural barriers and burdens, creates enabling standards, coherent policies and regulations, and backs their work with public investment and institutional legitimacy.



We therefore call on the EU institutions to take three steps, in this legislative and budget cycle:

1. Set the direction



Introduce an overarching EU Action Plan for a healthy, sustainable, resilient and just EU food system, with clear European Commission Directorates-Generals (DGs) ownership, accountability, integrated objectives, voluntary targets to track progress, and budget tied to production, consumption, processing, and food waste and loss reduction. Supporting the EU's wider goals of competitiveness and strategic autonomy, and building on the extensive preparatory work and consultations carried out under the past mandate in view of an integrated policy framework for Sustainable Food Systems.

2. Deliver it coherently



Act on the six packages across Directorates-Generals, political families, and Member States together, with *EAT-Lancet* aligned objectives embedded across Commission mandates. Start where conditions are strongest and impact greatest, and let early progress carry momentum as the packages are built to reinforce one another.

3. Keep the communities at the table



Involve the Communities for Action, alongside scientists and wider food system actors, in designing, delivering, and monitoring these policies. Recognise that the legitimacy, durability, and effectiveness of a coherent EU food policy depend on sustained engagement with the full breadth of actors who shape what Europeans grow, sell, prepare, and eat.

APPENDIX

A. Contributing Organisations

We would like to express our sincere gratitude to the 90+ organisations that have taken part in this dialogue process. Their engagement, time, expertise and willingness to contribute have been invaluable throughout the process. The breadth of participation has helped ensure a richer and more balanced exchange of perspectives, and has strengthened the quality, relevance and legitimacy of the insights that have emerged. Contributing organisations share the ambition to help create a healthier, more sustainable and more just food system, and have helped shape the insights and recommendations in this policy action brief through dialogue, input and review. The brief reflects the collective perspective of the group, while recognising that it does not necessarily represent the full and detailed positions of each individual organisation. Participation as a contributing organisation therefore does not imply endorsement of the brief in its entirety, or of every finding, formulation or recommendation.

Farmers: Agroecology Coalition (UNFSS), Arla, Association for Farmers Rights Defence Georgia (AFRD), Donau Soja, Caring Farmers, CIRAD, Climate Farmers, EARA, European Carbon Farmers, European Landowners Organisation, Farm of Francesco, Federal Office for Agriculture, FiBL, FrieslandCampina, IFOAM Organics Europe, Monte Silveira, Polytechnic Institute of Viseu, RaaPI, Refood, Swedish Society for Nature Conservation, Centre for Functional Ecology, University of Coimbra.

Consumers: Act4Food, BEUC, Consumentenbond, Consumers International, Cornell University, EU Food Policy Coalition, EuroConsumers, European Food Information Council (EUFIC), European Heart Network, European Vegetarian Union, University of Guelph.

Public Health Actors: European Lifestyle Medicine Council, European Medical Students Association, European Public Health Alliance (EPHA), FAO World Food Program, GAIN Health, Health Care Without Harm Europe, Healthy Diet Healthy Life (HDHL), INRAE, Physicians Association for Nutrition (PAN) International, PAN Czechia, PAN Nederland, Physicians for the Future, Planetary Health Alliance, Polish Society of Lifestyle Medicine, ProVeg International, Rhea, The Good Food Institute, UCD Institute of Food and Health, University College Dublin, UK Food Systems - Centre for Doctoral Training, University of Malta, Vegetarian Society of Denmark.

Cities: Carbon Neutral Cities Alliance, City of Barcelona, City of Copenhagen, City of Milan, City of Vienna, Comune di Bergamo, Eurocities, FoodCloud, ICLEI.

Retail & Manufacturers: Ahold Delhaize, Danone, UNDP, Esselunga, EuroCommerce, EUVEPRO, Flora Food Group, InterVeg, LIDL, Madre Brava, Nestle, Oatly, European Alliance for Plant-based Foods (EAPF), Plant-Based Foods Europe, Stiftung für Wirtschaftsethik, Tetra Pak, Uppsala University, WBCSD, WWF.

Food Services: Access to Good Food Foundation, European Food Systems, Finnish Institute for Health and Welfare, HelloFresh, Sodexo, Stockholm University, The Sustainable Restaurant Association, European Food Bank Federation (FEBA), University of Gastronomic Sciences

As the initiative moves forward, besides contributing organisations, we also welcome supportive organisations:

Standing Committee of European Doctors (CPME), European Society of Clinical Nutrition and Metabolism (ESPEN), and International Diabetes Federation (IDF).

Supportive organisations were not involved in the content creation phase of this policy brief, yet share the ambition of advancing healthy, just and sustainable food systems and are broadly supportive of the content of this brief. Being a supportive organisation does not imply endorsement of the brief in its entirety, or of every finding, formulation or recommendation.



B. Specific Community for Action Policy Unlocks

B.1 Farmers

Farmers are the primary stewards of agriculture and the foundation of the food system, shaping not only what is produced, but also how natural resources, animals, and soils are managed over time. Their decisions affect biodiversity, soil health, water, climate resilience, and the long-term capacity of Europe to feed itself. They sustain local economies, skills, and community life in rural areas. Without a strong and viable farming community, ambitions for healthier, more sustainable, and more resilient food system cannot be achieved.

This community calls for the following policy unlocks:

1. **Implement generational transfer incentives** and fast-track support packages that prioritise sustainability from day one to facilitate affordable land access for young farmers and new entrants committed to nutrient-dense, low-input systems, including sustainable livestock production.
2. **Invest in regional value-adding capacities and market-entry conditions to enable the safe valorisation of agricultural outputs**, including unavoidable by-products into higher-value food, feed, and bio-based uses while reducing losses, improving circularity, and keeping more benefits near production hubs.
3. **Mandate healthy, just, and environmentally sustainable food procurement**, such as legumes, whole grains, seeds and nuts, in line with the planetary health diet, in public canteens and food services, supported by science-backed minimum quotas and sustainability criteria
4. **Support long-term market-oriented research** that demonstrate a practical performance across climates, species and equipment types, with clear pathways to farm-level adoption in the near term, to enable climate-ready, nutrition-focused production and economically viable alternatives to chemical pesticides.
5. **Align public support, including CAP payments, agro-environmental funding, and de-risking mechanisms, to reward ecosystem stewardship** and support profitable shifts toward more diverse, nutrient-dense crop rotations, as well as sustainable livestock production, while helping farmers manage transition costs, including stranded assets. Move the CAP away from action- to result-based payment schemes.
6. **Support cross-value-chain coordination** through producer organisations, cooperatives, partnerships, openly usable shared data systems, and multi-year written contracts, to strengthen farmers' position and bargaining power, while improving benchmarking, decision-making and allowing for shared risk across the value chain.
7. **Develop and strengthen qualified advisory services on sustainable farming and healthy food production**, supported by farmer training through agricultural schools, demo sites, peer learning, and producer organisations, to improve management know-how, close yield and quality gaps, and de-risk adoption.
8. **Strengthen unfair-trading rules and align import and sustainability standards with EU requirements**, to support fair competition and a level playing field for actors across the value chain.

to create predictable demand that stabilises prices, de-risks production shifts, and supports long-term market opportunities for farmers.



B.2 Consumers

Consumer representatives are key actors of decision-making in food environments, bringing the importance of daily choices that shape food demand and signal what is valued in the marketplace. Their choices are shaped by cost, income, literacy, culture and geography, hence an enabling food environment is needed to encourage the right choice.

This community calls for the following policy unlocks:

1. Improve food access, affordability and food literacy: Across Europe, food affordability is increasingly recognised as a social challenge, not simply because of a matter of market prices, but because time, money and knowledge constraints have made ready-to-eat meals a more convenient and easy option. For low-income households in particular, the time and cost of preparing healthy meals can represent a real barrier, which is rarely acknowledged in public and policymaking. Addressing it requires policy that works across multiple fronts. For instance, EU-level targets for food security, mandatory reformulation targets for nutrition-poor products to cut unhealthy ingredients and preserve nutritional value. A broader access to diverse protein sources — including alternative types of proteins and naturally protein-rich foods like legumes,

nuts and seeds — can deliver health, environment and economic competitiveness. Finally, another lever is to improve consumers' food literacy, especially for children and adolescents.

- 2. Restrict advertising of unhealthy foods (e.g., HFSS) through voluntary pledges,** especially for children (<18yo), both online and offline, to curb diet-related illnesses.
- 3. Harmonise and make mandatory nutritional front-of-pack labelling** across food products sold in supermarkets to provide consumers with transparent and clear information on the nutritional value of food, and shift market incentives toward healthier food options.
- 4. Introduce minimum voluntary criteria in public food procurement, in schools, hospitals, care homes, and public institutions,** to promote the consumption of healthy, nutritious, and sustainable food, including organic and seasonal foods, cooperative markets, and commercial kitchens development, and give cities, which have achieved good best practices in this domain, the confidence to act beyond price-based decision-making. Promote (require) farm visits as part of the school (and university) curriculum at all levels.
- 5. Use subsidy schemes (e.g., EU School scheme) to make healthy food more affordable** in order to shape food

environments in promoting healthy food options and build consumers' food literacy.

6. Strengthen bottom-up action and consumer' participation in food system policy making and governance in order to support co-designing local food initiatives, while holding institutions accountable.

7. Include social and environmental standards into trade agreements (existing and future ones), in order to promote high environmental and social standards linked to food production, not just at home, but also when importing from third countries.

8. Review "best before" information on food products. Make "best before" dates optional on products that don't pose safety risks to support the reduction of households' food waste and improve consumers' clarity on the perishability of food bought in supermarkets.

9. Provide incentives for the collection of unsold food products at all stages of the food supply chain and for their safe redistribution, including to charitable organisations, to reduce food waste and loss.

B.3 Public Health Actors

Public health actors, including medical doctors, nutritionists, dietitians, researchers and public health authorities, are uniquely positioned to support the transition towards healthier diets from a more sustainable and equitable food system. As lifestyle and diet-related illnesses remain the leading cause of deaths in Europe, public health actors can offer a credible, trusted and evidence-based voice to connect policies from production to primary and secondary prevention, and primary/secondary prevention to treatment. They can bridge the gap between food production and consumption policies to support the development of dietary patterns that benefit both human and planetary health aligned with the PHD and national dietary guidelines.

This community calls for the following policy unlocks:

1. Bridge agricultural policies and CAP subsidies with public health outcomes in order to support production systems that contribute to diversifying protein sources supporting healthier and more sustainable dietary patterns from a public health perspective (e.g., plant-rich diets like



flexitarian and vegetarian diets can support cardiovascular disease prevention). For instance, the creation of an EAT-Lancet Committee could be tasked in implementing a cross-sectoral agricultural-climate-food-health resilience strategy.

2. **Set binding reduction targets for antibiotics in animal farming** in order to strengthen antimicrobial stewardship and curb AMR outbreaks.
3. **Develop an EU-wide framework for 'good practices' in reviewing national dietary guidelines** to link health and sustainability based on the latest scientific evidence about healthy and sustainable diets to support healthier and more sustainable consumption patterns.
4. **Restrict misleading advertising, including price promotion, of unhealthy foods** in order to curb diet-related illnesses such as cardiovascular diseases, cancer, type 2 diabetes and other chronic and non-communicable diseases (NCDs).
5. Harmonise and make mandatory **nutritional front-of-pack labelling** on foods sold in supermarkets to provide consumers with transparent and clear information on the nutritional value of food.
6. **Set binding targets for reformulation of HFSS foods and food fortification** to curb the consumption of unhealthy foods and support essential micronutrient intake in plant-rich dietary patterns. The UPF debate is increasingly being weaponised to target plant-based foods without a scientific basis, and that debate is happening without the clinicians and dietitians who understand its nuance. This highlights the need for a globally accepted definition of UPFs for policy and regulatory purposes.

7. **Rebalance economic structures and fiscal incentives across public procurement and price settings** in order to make healthy options genuinely affordable. In public procurement, developing an EU-wide requirement for a minimum amount of plant-rich and minimally processed meal options (e.g., flexitarian or vegetarian aligned with food-based dietary guidelines and the Planetary Health Diet) for schools, canteens, hospitals, and publicly served meals could support healthier and more sustainable food environments. At the same time, financial incentives, in the form of VAT reduction, across Member States should also be supported in order to promote better dietary patterns.

8. **Develop EU-wide recommendations for the development of national evidence-based nutrition curricula for medical and healthcare professionals** to build the knowledge needed to strengthen primary and secondary prevention. Structural prioritisation of prevention within health systems, through nutrition education for healthcare professionals, clinical training, and care pathway integration based on national dietary guidelines should be prioritised.

B.4 Retail and Manufacturers

Food retail (incl. wholesale) and manufacturers are critical agents of change, guiding both food supply and responding to demand. Informed by consumers needs and wants, they play a central role in connecting actors along the food supply chain, including production, to ensure a broad choice of quality products are available. As they are in direct touch with consumers, they play an important role in informing consumers about healthy and sustainable food. They are uniquely positioned to support the adaptation towards a healthier, more equitable,

and environmentally sustainable food system. Achieving this vision requires a strong policy environment that enables and incentivises collaboration across the entire food value chain and support businesses to invest in demand-side incentives to encourage healthy and sustainable consumption.

This community calls for the following policy unlocks:

1. **Include criteria in public procurement directives to favour healthy, just, and environmentally sustainable foods**, that contribute to the planetary health diet, to incentivise and create demand from public institutions (e.g., offices, schools, hospitals, etc.) to food manufacturers and retailers for healthy and sustainable foods.
2. **Introduce policies that harmonise consumer information and transparency requirements around nutrition and environmental qualities**, to allow for more informed decision-making by consumers. E.g., product claims, harmonised emission methodologies, food literacy, voluntary data sharing platforms, advertisement, front/back of pack labelling, and digital labelling.
3. **Support Member States around fiscal measures to incentivise the consumption of healthier, more sustainable, and more just food**. E.g., Establish a Member State cooperation network around VAT reduction and best practice sharing for healthy and sustainable food categories that should play a larger role in planetary health diets like fruits, vegetables, nuts, legumes, and fibre-rich foods, or equalising of VAT for plant-based alternatives to animal-based counterparts.
4. **Enable food manufacturers and retailers to source more sustainably by introducing policies, co-financing, and guarantees to support farmers to use sustainable, circular,**

and resilient farming practices, including rewarding ecosystem services, technical training, good working conditions, high animal welfare standards, and transition grants for sustainable farming practices and the production of healthy and sustainable food categories that should play a larger role in planetary health diets.

5. **Incentivise food waste and loss reduction and circularity for food manufacturers and retail**. E.g., ease the repurposing of food leftovers (e.g., liability-safe, and zero-VAT food donation to charities/food banks), innovation incentives to prevent food waste (e.g., innovation around processing, packaging, storage, and side-stream valorisation), strengthen implementation of food waste and loss reporting, voluntary targets, transparent tracking on target achievement, and facilitate cross-sector collaboration and data sharing.
6. **Finance or complement investments into research and innovation in vegetables, fruits, legumes, grains, and nuts, and healthy and sustainable animal-, plant-, and alternative proteins**. E.g., crop cultivation to improve yield and resilience, processing techniques and ingredient innovation to improve taste and health qualities, behavioural and health research to support consumer acceptance and adoption of well-balanced diets, and faster market entry for novel foods without jeopardising food safety. Moreover, ensure retail and manufacturer involvement during innovation projects to ensure economic alignment, market orientation and better scaling and deployment across the value chain.
7. **Create more consumer demand by aligning EU-funded food promotion campaigns with a priority for healthier, more sustainable, and just food products**. E.g., prioritising evidence-based communication and promotion campaigns of healthy food categories that should play a larger role in planetary health diets and practical food

skills such as cooking and nutrition education into school programmes and community initiatives.

8. Incentivise product reformulation of products high in sugar, salt, and fats (HFSS), and align fortification rules with nutritional needs. With a focus on bringing the nutrition profiles of foods closer to the planetary health diet recommendations, and allowing the fortification of organic products, to create a stronger EU single market for retail and manufacturers around reformulation and fortification, which should make it easier for consumers to make healthier choices. Measures should focus on positive incentives, innovation, and reformulation, addressing overall dietary patterns, lifestyle factors, and the full nutritional and ingredient profile of foods.

9. Develop an EU-wide guidance for Member States around protein diversification strategies, including protein split targets to create a level playing field for retailers, and to strengthen the whole value chain to contribute to achieving the protein split targets.

10. Ensure the implementation and guidance for EU corporate due-diligence requirements and the Trade and Sustainable Development commitments in EU trade agreements so food manufacturers and retailers can have greater confidence in fair labour conditions,

minimum standards for working conditions, living wages, and human rights in their food supply chains. Build on responsible business fora and existing benchmarks related to social and environmental corporate responsibility.

B.5 Cities

In Europe, three out of four people live in urban areas. The design and governance of cities have a significant impact over food system functions from production through to waste management as well as the quality of life of their denizens. Regulation and spatial planning shape consumer food environments and opportunities for urban agriculture. City institutions influence production in their foodshed through public procurement. Social services and public infrastructure impact health outcomes, food access, and nutrient recovery from food waste. Action at the city-level could improve health, environmental, and justice outcomes for the majority of Europeans, but EU collaboration at this scale may require new ways of working.

This community calls for the following policy unlocks:

1. Develop formal mechanisms for city and municipal government engagement with EU-level policies and initiatives. This may include creating channels to allow municipal



government voices to be heard in EU forums, meaningfully involving cities in creating and implementing research, and adapting funding mechanisms to allow cities to implement interventions.

2. **Restrict the marketing, advertising, and availability of HFSS foods targeting children, including in digital spaces and around schools**, to protect children from harmful influence and consumption. Ground restrictions in evidence-based health guidelines (e.g., limiting high levels of sugar, fat, and salt).
3. **Set binding food waste reduction targets for the urban food service sector, including mandatory reporting**, to reduce large volumes of food waste generated in cities. Assess baseline levels of food waste to set targets and monitor the impact of regulations.
4. **Introduce minimum criteria in public food procurement, including in schools, hospitals, and other public institutions**, to promote healthy and sustainable diets.
5. **Develop an EU-wide guidance supporting lower VAT or tax incentives on healthy products (e.g., fruits, vegetables, legumes, whole-grains, pulses and nuts)** to make healthy food more affordable.

6. **Introduce EU-level guidelines that ensure a minimum density** of food retailers carrying fresh and healthy products in underserved areas to improve equitable access to affordable, healthy food, and reduce the prevalence of food swamps and deserts.

7. **Create and deliver a strong communication campaign** to shift the behaviour and dietary patterns of EU residents towards ones that are healthier and more sustainable.

B.6 Food Services

Food service organisations are a critical link between production and manufacturing upstream and consumer choice downstream. Through procurement, these actors can shape demand for agricultural products and influence production methods. Simultaneously, they can craft healthier, more sustainable, and delicious menus that spark joy and make the healthy and sustainable choice an easy one. Shifts to the enabling environment for these businesses may be necessary to ensure positive outcomes for consumers as well as dignified and secure livelihoods for workers across the value chain. Policies and interventions must be developed and tested with organisations of different sizes and in different contexts to ensure that they work at an operational level.



This community calls for the following policy unlocks:

1. **Include criteria in public procurement directives** to favour healthy and environmentally sustainable produced foods, in line with the planetary health- and food-based dietary guidelines, to incentivise and create demand from food service organisations for healthy and sustainable foods. E.g., adopting a guideline for a minimum of one nutritious plant-rich meal on offer.
2. **Enable food service businesses to source sustainably by introducing policies, co-financing, and guarantees to support farmers to use sustainable and resilient farming practices**, including good working conditions, high animal welfare standards, and transition support for sustainable farming practices and protein diversification. Foster and test collaborative models between producers, food service organisations, and financiers to transition demand and offerings.
3. **Create policies to strengthen nutrition and sustainable diet training across educational institutions.** In primary and secondary schools, introduce a mandatory curriculum of sustainable dietary patterns aligned with the planetary health diets. Increase nutrition training and curriculum in tertiary education for doctors, nurses, and healthcare professionals; particularly to ease patient referrals between healthcare professionals and nutritionists.
4. **Introduce and update policies that support tackling food waste in food services and restaurants.** Offer clear and comprehensive legal protection for food donors to reduce liability, which currently disincentivises donations. Divert food waste streams by introducing requirements to prioritise recovery and donation. Craft harmonised EU guidance to prevent food waste (e.g., portion sizes, packaging formats, expiry date labelling) and introduce food waste reporting requirements, target setting, and data sharing.
5. **Provide EU guidance to align taxes** to improve the affordability and increase the consumption of healthier, more sustainable, and more just foods. E.g., reduced or zero VAT rate on healthy and plant-rich meals and fruits, nuts, and other fibre-rich foods, or disallowing reduced rates for products high in total sugar, salt, and unhealthy fats. Harmonise tax reduction and exemptions for food donations.
6. **Harmonise reporting and regulatory requirements.** Ensure data collection and sharing requirements are ambitious but also feasible for actors of different sizes. Develop and test requirements in extensive collaboration with food service organisations, particularly those operating at a smaller scale.
7. **Finance critical infrastructure in the midstream.** Close gaps in processing infrastructure and food waste recovery to allow stronger value chains between producers and food service organisations.
8. **Align EU-funded food promotion** for campaigns focusing on agricultural products contributing to diversified and well-balanced diets that are healthier, more sustainable, and more just. Focus food categories that should play a larger role in planetary health diets, such as fruit, vegetables, legumes, seeds, nuts and pulses.
9. **Develop EU-wide guidance on protein strategies and protein split targets** to create a level playing field for food service organisations and encourage chefs and food manufacturers to contribute to achieving those targets.
10. **Strengthen the implementation of EU corporate due diligence requirements and trade rules** so food service organisations can rely on fair labour conditions, minimum standards for working conditions, ensure living wages, and uphold human rights in their food supply chains.



- (1) [EU burden from non-communicable diseases and key risk factors](#), EU Commission, 2026
- (2) [EU Action on Antimicrobial Resistance](#), EU Commission, 2026
- (3) [Soaring Food Prices Threaten Recent Economic Gains in the EU](#), World Bank Group, June 2025
- (4) [Fertiliser prices are increasing](#), European Commission 2026
- (5) [Identifying the safe operating space for food system](#), *Nature Food*, October 2025
- (6) [Sustainable use of key natural resources, an urgent need for reform](#), EU Commission, 2026
- (7) [Caring for soil is caring for life](#), EU Publication, 2020
- (8) [Reducing the plant protein deficit of the European Union](#), DG Agri, 2026
- (9) [EAT-Lancet report 2.0](#), The Lancet, October 2025
- (10) [Towards more balanced dietary guidelines: connecting climate, culture, and nutrition](#), A. Klapp, Cambridge University, Sept 2025
- (11) [EU Action on Antimicrobial Resistance](#), European Commission, 2026
- (12) This dialogue process mirrors [a community for action dialogue process](#) that had successfully been done in the year prior to the 2025 EAT-Lancet Commission launch. The process for creating this EU Policy Action Brief has been tweaked to make it more regionally relevant and actionable for EU policy makers.
- (13) The convening organisations of this initiative are a mix of science and civil society organisations that have deep knowledge of food systems and public health: EAT, Physicians Association for Nutrition, Protein Project, Fern, BirdLife, FEAST 2030, Convene.
- (14) A separate note on ultra-processed food: While the WHO and European Union commissioned a study on the matter, across the communities there is a shared caution on how the "ultra-processed" label is used. Public health actors raise a concern about the (mis)use of the UPF narrative to lump nutritionally distinct products together, which can discredit nutrient-rich processed and fortified foods. Retail and food manufacturing ask to focus on the nutritional profile over processing alone and note that incentives for healthy food formulation are preferred over negative measures.

