Disclaimer: The contributions received cannot be regarded as the official position of the Commission and its services and thus do not bind the Commission. Responses to the consultation activities cannot be considered as a representative sample of the views of the EU population.

1. OBJECTIVES OF THE CONSULTATION

The public consultation supports the preparation of a new EU sustainable food system initiative.[1] This initiative will aim to make the EU food system sustainable and integrate sustainability into all food-related policies. The initiative is part of the wider Farm to Fork Strategy[2], which (in the context of the European Green Deal[3]) recognises the inextricable links between healthy people, healthy societies and a healthy planet and aims to address the challenges of sustainable food systems comprehensively.

The sustainable food system initiative will lay down general principles and objectives, together with the requirements and responsibilities of all actors in the EU food system. The initiative is due to be adopted by the Commission in the second half of 2023.

The public consultation on the EU sustainable food system initiative was open for twelve weeks between 28 April and 21 July 2022 and accessible in all official EU languages via the “have your say” platform. It aimed at collecting the views from all relevant stakeholders, namely citizens, economic operators (including SMEs) and their representative organisations, public purchasers, public authorities at all governance levels, academic and research institutions, consumer organisations, social partners, NGOs, and any other interested stakeholder.

The main purpose of the public consultation was to gather opinions and evidence, where available, on the key issues the initiative seeks to address, and on the main elements to be considered when formulating policy options to respond to those issues.

This public consultation is part of the broader consultation strategy of the European Commission on this initiative. It is followed and complemented by a series of targeted consultation activities, including interviews, surveys and stakeholder workshops.

2. OVERVIEW OF RESPONDENTS

A total of 2,671 responses were received from all 27 EU Member States and 21 non-EU countries. Data was screened and cleaned in line with the Better Regulation Toolbox[4]. One duplicate was identified and separated from the analysis. Therefore, the final number of responses for the analysis amounted to **2,670 responses**.

Most contributions to this consultation came from respondents identified as citizens, accounting for 77% of all respondents (2062 replies), followed by civil society organisations accounting for 11% of all respondents (282 replies), which encompass NGOs (198 replies), academic and research institutions (59 replies) and consumer organisations (25 replies). Business associations, companies and trade unions account for 10% (255 replies) of all respondents, public authorities for 2% (48 replies) and "other" for the remaining 1% (23 replies).

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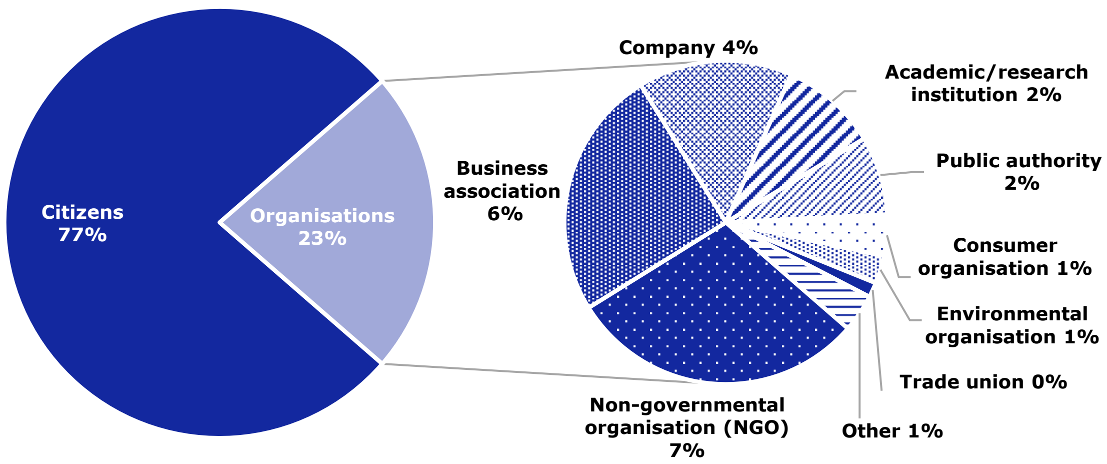
[1] Sustainable EU food system –new initiative. Available at: https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13174-Sustainable-EU-food-system-new-initiative_en
[2] COM(2020) 381 final. A Farm to Fork Strategy for a fair, healthy and environmentally friendly food system. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0381
[3] COM(2019) 640 final. The European Green Deal. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1576150542719&uri=COM%3A2019%3A640%3AFIN
[4] Better regulation toolbox #54. Available at: https://ec.europa.eu/info/sites/default/files/br_toolbox_-_nov_2021_-_chapter_7.pdf

Figure 1 Breakdown of responses by stakeholder group

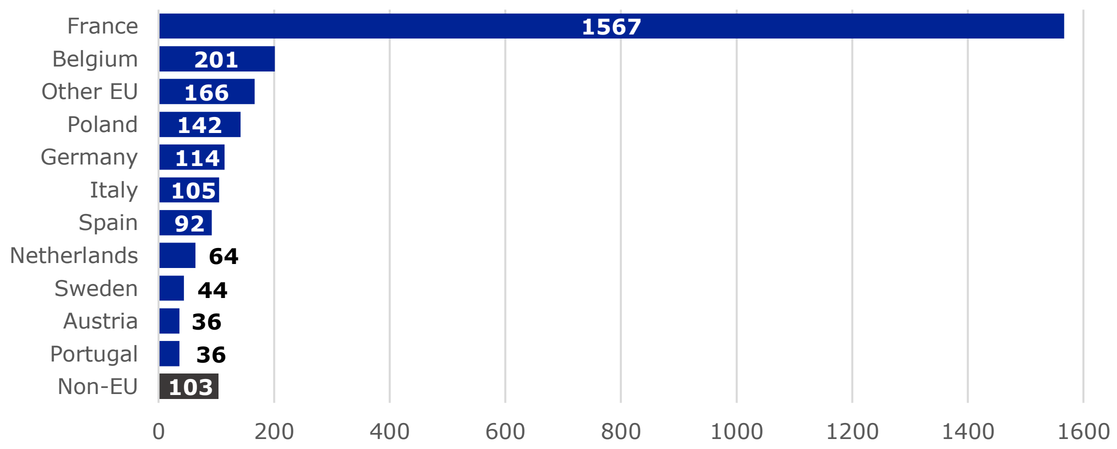


n=2,670

Most respondents (1,563) indicated France as their country of origin, followed by Belgium (199), Poland (142), Germany (114) and Italy (105). Overall, 96% of respondents come from an EU country. All 27 Member States are represented. Non-EU respondents (103 responses) come from 21 different third countries, with the largest numbers of responses from the UK (28), Norway (19) and the US (12).

Several non-governmental organisations – mostly in France – encouraged the public to respond to the consultation in three different occasions through certain civil society movements. Although the organisations provided detailed advice, as well as proposed draft replies, to assist potential respondents with the questionnaire, there were no two identical replies. Indeed, although such replies could arguably be attributed to either of these three civil society movements, they nevertheless show a considerable degree of variation in response patterns. While these civil society movements certainly contributed to the high number of replies from France, they do not qualify as campaigns in the sense of the Better Regulation Guidelines and therefore none of the replies were separated from the analysis.

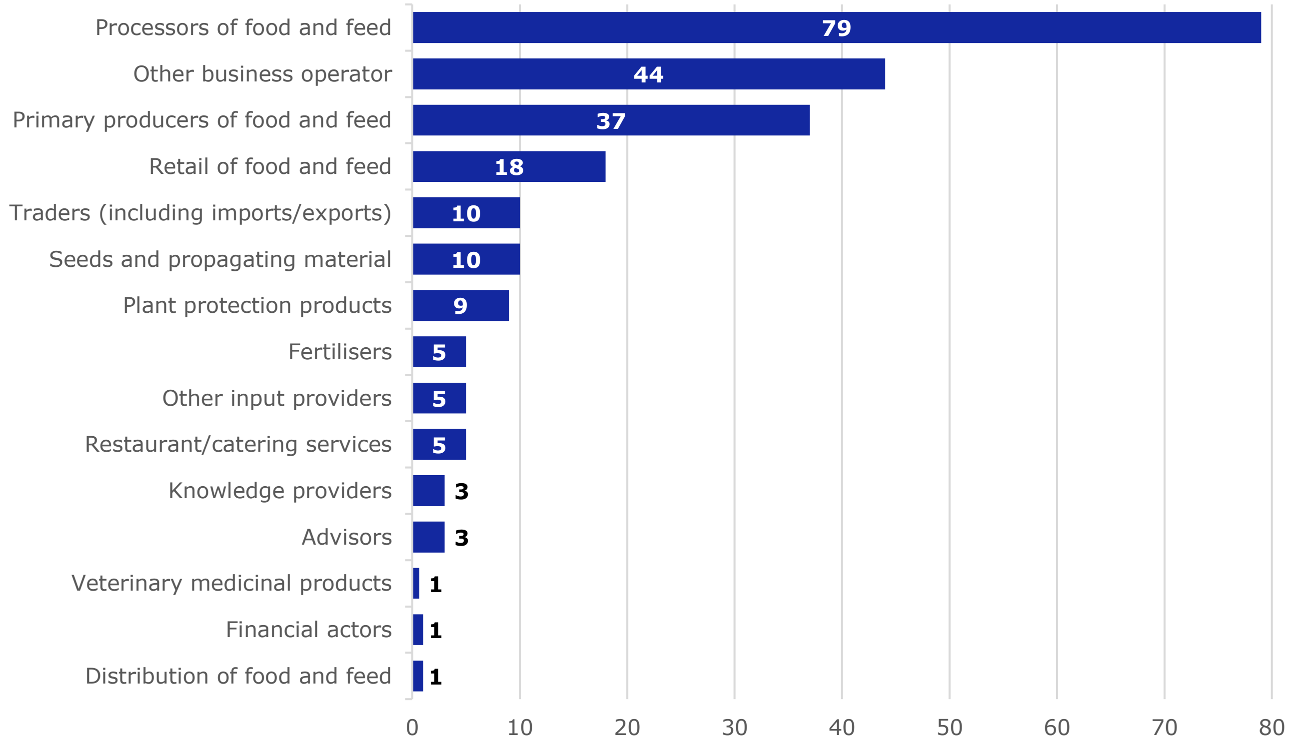
Figure 2 Breakdown of responses by country of origin



n=2,670

Of the 255 business associations, business organisations and companies and trade unions replying to the consultation, 231 business associations and companies provided information on their activities, 34% (79 replies) indicated operating as processors of food and feed, 16% (37 replies) as primary producers, 8% (18 replies) as retailers and 5% as traders of food and feed (10 replies) and of seeds and propagating material (10 replies). A fifth of respondents (44 replies) to this question indicated representing another type of business operator than the ones listed. Amongst them, ten indicated being involved at multiple stages of the food chain, five in biotechnology and four as retailers or producers of drinks.

Figure 3 Breakdown of responses from business associations and companies by area of activity



n=231

3. Preliminary review of the replies

Sustainability of the current EU food system and role of actors in the transition

A large majority of respondents agree that the EU food system has to become more sustainable. Overall, 92% of respondents (2,465 replies) strongly or somewhat agree that the existing EU food system is not sustainable in the long term and 94% (2,502 replies) that the current food system is not ready to meet future environmental and climate change challenges. Views of companies and business associations differ markedly from the overall response patterns. Amongst companies and their associations, 25% of respondents (64 replies) strongly agree that the current food system is not sustainable, compared to 91% of citizens indicating strong support for the statement (1,842 replies). Another 24% of businesses and their associations neither agree nor disagree or disagree with the statement (62 replies). Views diverge in similar patterns on the readiness of the food system to meet future challenges. Contrary to this, more than 95% of respondents across all stakeholder groups strongly or somewhat agree that sustainability is fundamental for food security and the food system's resilience in the long term (2,612 replies) and recognise the strong interplay and interdependency between the environmental, social and economic dimensions of sustainability (2,573 replies).

In the views of respondents, the transition towards greater sustainability requires action from a wide range of actors. Large majorities of respondents consider all actors responsible for achieving the transition to a sustainable food system. More than 90% of respondents agree that actions from public authorities are very or somewhat important, whether it is at the national (2,559 replies), EU (2,530), regional (2,461) or local level (2,416). Similar numbers of respondents indicate the same for consumers and the supply side of the food system (92% each). Slightly lower levels of importance are attributed to traders (88%, 2,352 replies), hospitality and food services (86%, 2306 replies), and operators in the area of food contact materials (79%, 2,099 replies). With slight variations, sentiments on the importance of different actors' actions are widely shared across the different stakeholder groups.

With regards to the ease for actors of the food system to make sustainable choices, responses differ. About half of respondents indicate that in their view, it is (very) difficult for consumers and primary producers of food to make sustainable choices. Fewer respondents (about a third) state similar sentiments for manufacturers (975), traders (815) and retailers (804). Contrary to this, more than 60% of respondents state that it is very or relatively easy for the hospitality and food services sectors (1648 replies) and public authorities to make sustainable choices.

BARRIERS TO THE TRANSITION

Respondents to the public consultation see a multitude of factors as barriers to more sustainable choices. About three out of four respondents (74%, 1,968 replies) state that imbalanced market powers in the food system prevent sustainable choices to a high extent. In fact, 70% (1,870 replies) of respondents indicate that the absence of systematic integration of sustainability in the operations of food system actors is a preventing factor to a high extent. More than nine out of ten respondents also flag the lack of transparency on whether products are sustainable as a barrier to more sustainable choices to some or a high extent. 92%, of respondents (2,451 replies) express the view that choices and consumption habits based on short-term costs are also a barrier. Similar numbers of respondents identify as barriers the absence of a regulatory framework (lack of systematic sustainability objectives, definitions etc 1,867 replies) as well as the lack of targeted incentives to produce sustainable food (1,883). Generally, there appears to be a consensus across stakeholders for most of the factors. Marketing and advertising practices, however, show the highest divergence in opinions amongst stakeholders; while more than 90% of both citizens and NGOs reply that such practices prevent food system actors from making sustainable choices to a high or some extent, only 68% of businesses and associations share the same opinion.

GOVERNANCE AND RESPONSIBILITIES OF ACTORS

Respondents call for greater action at all levels of governance. In the view of a large share of respondents, governments insufficiently promote sustainable food systems. More specifically, 71% of the respondents consider promotion at the EU level as insufficient (1,903 replies), followed by the regional (68%, 1,816 responses) and local (1,823) levels. Similarly, 65% of respondents (1730 replies) state that national governments insufficiently promote sustainable food systems, and another 27% (711 replies) state national governments do not promote it at all. At least six out of ten respondents consider further that all levels of government are important to accelerate the transition to a sustainable food system.

There is strong support for a harmonised, EU-wide approach. Indeed, 95% of the respondents (2,545 replies) strongly or somewhat agree on the necessity to establish EU-wide general objectives, principles and definitions relevant to the food system's sustainability. Moreover, 90% strongly or somewhat agree (2408 replies) to translate sustainability objectives for the EU food system into specific requirements by sector where these are not yet available. Support for this statement is noticeably lower among businesses and their associations, with 56% of the respondents among them (142 replies) strongly or somewhat agree that sustainability objectives for the EU food system should be translated into specific requirements by sector. Furthermore, 96% of respondents (2550 replies) strongly or somewhat agree that EU and national competent authorities should ensure that sustainability is mainstreamed in all food-related policies, while 95% (2,542 replies) consider that best practices contributing to achieving a sustainable EU food system should be shared *across the EU and nationally*. Here, response patterns are similar across stakeholder groups. More than three out of four respondents, indicate that responsibilities should be reflective of the size of business operators (2,080 replies). Among businesses and their associations, there is less support for such a tiered approach, with 26% of respondents from these groups (66 replies) disagreeing and another 13% (32 replies) neither agreeing nor disagreeing.

Respondents largely agree that actions of food system actors should respect the environment, social aspects, and animal welfare. More than eight out of ten respondents state that activities of the food system actors should not significantly harm environmental and climate change efforts. More or close to nine out of ten respondents state that it is very important that these economic activities should not harm the sustainable use and protection of land (2,422), the sustainable use and protection of water and marine resources (2,440), the protection and restoration of biodiversity and ecosystems (2,397 replies), and climate change and mitigation (2,378 and 2,276 replies respectively). Respondents are also concerned about the social sustainability of economic activities. For example, 97% of citizens responding to the public consultation (2,001 replies) consider the affordability of food as (very) important, 93% of the NGOs (207 replies), and 86% of respondents among businesses and their associations (218 replies).

About half of the respondents actively contribute to the transition already. When asked about their engagement, half of the respondents (1,361 replies) declare to be involved in a platform, dialogue group or initiative that aims to contribute to sustainable food systems. Amongst respondents involved in such platforms, groups, or initiatives, 31% (802 replies) take part in an initiative active at national level, 23% (592) at EU level and 18% (475) at local level. About 40% of the citizens responding to the survey indicate that they are involved in a platform, dialogue group or initiative (817 replies), while 85% of businesses and their associations indicate the same (216 replies).

CONSUMER INFORMATION

Views among stakeholders on what and how to inform consumers on the sustainability of products differ across stakeholder groups. Respondents have been asked to rank different aspects consumers should receive information on so as to be able to make sustainable food choices. On average, respondents rank information on animal welfare first, followed by climate, environment, fair and just working conditions, nutrition, and fair and just remuneration of producers. Among citizens, animal welfare is ranked first by 35% of the respondents (718), compared to 17% among NGOs (38 replies) and only some 2% among businesses and their associations (six replies). The largest shares among NGOs and business (associations) rank nutrition highest, with 28% of NGOs (63 replies) and 37% among businesses and their associations ranking this aspect highest. Furthermore, 67% of the respondents strongly or somewhat agree that consumers pay more and more attention to the sustainability of the food they buy (1,787 replies). A similar percentage of respondents express scepticism that provision of information on the sustainability of products will accelerate the transition to a sustainable food system. NGOs are more inclined to strongly disagree with this statement (with more than 57% strongly disagreeing). Businesses and their associations, as well as public authorities, are less likely to disagree. Almost 30% of the public authorities (14 replies) and about 23% of businesses and their associations (59 replies) agree with the statement, which presents the highest rates of agreement across all stakeholder groups. In addition, 84% (2,253) strongly or somewhat agree that a dedicated sustainability label would help consumers to make sustainable food choices. Views differ on the impact on business operators: three out of four respondents (2,003 replies) do not think that reliable and evidence-based sustainability labelling of food will incentivise operators to supply more sustainable products. Moreover, 78% of respondents (2,078 replies) strongly or somewhat agree that sustainability information currently provided to consumers on food products is clear and easy to understand. However, only 12% (320) consider such information reliable. More than 91% of citizens responding to the public consultation are concerned that too many labels on products might be confusing for consumers (1888 replies), a concern that is shared by about 87% of NGOs (194 replies), and by slightly less than two thirds of businesses and their associations (162 replies).

When faced with the hypothesis of an EU sustainability label being established, respondents generally embrace the idea but express a diversity of views on the nature of such a label. Across all stakeholder groups, less than 10% of replies suggest that an EU sustainability label is not necessary. In fact, 77% of respondents (2,044 replies) state that a label informing on the sustainability of all EU and imported food products should be mandatory, while 5% advocate a mandatory label (137) for EU food products only, excluding imports. 6% of respondents (166 replies) indicate that such a label should be voluntary and identify only sustainable food products, while 3% (77) agree on a voluntary label identifying both sustainable and non-sustainable food products. Support for a mandatory label capturing all products (produced in the EU and imported) is highest among citizens, with 84% among this stakeholder group favouring the option (1730 replies), compared to just 25% of businesses and associations supporting this option (63 replies). Among the latter stakeholder group, the largest share of respondents favours a voluntary label identifying sustainable products, with almost one third of businesses and their associations selecting this option (78 replies).

SUSTAINABLE PUBLIC PROCUREMENT

Many see public procurement as a feasible way forward to strengthen the transition towards greater sustainability of the food system. A very large majority of respondents (94%, 2,520replies) state that schools and public institutions should consider sustainability when purchasing food. Only 1% of respondents (40 replies) disagree. More than 90% of citizens and NGOs responding consider the extent to which schools and institutions should consider sustainability great, compared to 52% among businesses and associations (132 replies). Furthermore, 73% (1,842 replies) of the respondents consider sustainable procurement for schools and public institutions as very important or impactful for the transition towards a sustainable food system, and another 21% (548 replies) consider it as at least moderately important or impactful. Only 3% (71) of respondents state that such actions would have no or a limited importance, with the remaining respondents staying neutral.

While stakeholders agree on the potential role of sustainable procurement, views on procurement procedures and the types of food offered differ among them. Respondents were also asked about their preferred characteristics of food procured to schools and public institutions. More than 90% of respondents strongly or somewhat agree that meals served through public procurement should be enjoyable and tasty (2,423 replies), as well as affordable (2,472). These sentiments are shared across stakeholder groups, although about a quarter of the businesses and associations responding to the questionnaire preferred not to take a position (62 and 63 replies respectively). Yet, whereas overall 86% of respondents (2292 replies) strongly or somewhat agree that companies that respect social values beyond the sectoral collective agreements should be favoured in procurement, this idea is supported by less than 40% of businesses and their associations (97 replies). In line with this, support for a stronger reflection of social impacts of meals in the procurement procedure is noticeably lower amongst businesses and their associations (62% or 157 respondents agree strongly or somewhat) in comparison to the support amongst citizens responding to the public consultation (92%,1,904 respondents agree strongly or somewhat). Similar differences of the views can be observed for reflecting the environmental impacts and nutritional value of meals stronger in the procurement procedures. About 30% of businesses and associations agree strongly or somewhat that organic meals or ingredients should be offered more frequently (76 replies), as opposed to 91% of citizens and 86% of the NGOs responding to the consultation (1,870, 191 replies respectively). Businesses and associations are also less supportive of offering plant-based alternatives should be offered more frequently, as 37% agree strongly or somewhat (92 replies). Other stakeholders maintain the opposite opinion, with overall more than 88% of the respondents indicating strong or somewhat support (2359 replies).

FOOD ENVIRONMENT

Targets for (added) sugars, salt, and saturated fat receive greater support amongst citizens responding to the public consultation than amongst businesses and their associations. A very large majority of respondents (88%, 2,351replies) strongly or somewhat agree to see the encouragement of a higher consumption of whole grain cereals, vegetables, fruits, legumes and nuts on the one side, and a lower consumption of red meat and foods high in sugars, salt, and saturated fat on the other side. Most respondents also strongly or somewhat agree on the necessity to set food composition targets. Indeed, 83% (2,227 replies) of respondents strongly or somewhat agree that food composition targets for added sugars, salt and saturated fat for processed and ultra-processed foods and meals should be set. Views noticeably differ among businesses and their associations. Amongst respondents from these stakeholder groups, 36% disagree somewhat or strongly that food composition targets for sugars, salt, and saturated fat should be set (91 replies), while 25% agree strongly or somewhat (63 replies). Amongst businesses and their associations, support is slightly higher for setting targets for added sugars, salt and saturated fat for processed and ultra-processed foods and meals, as 34% of respondents from these groups strongly or somewhat agree (87 replies), while 28% strongly or somewhat disagree (70 replies).

There are also diverging views between citizens and NGOs on the one side, and businesses and their associations on the other side about restriction of certain marketing techniques. Amongst citizens responding to the consultation, 95% are in favour of restricting the marketing, advertising and sales promotion of foods high in saturated fat, salt or sugars to children (1,940 replies strongly or somewhat agree), 86% of citizens would like to see marketing techniques restricted unless the products they relate to are of high nutritional standard (1,765 replies strongly or somewhat agree). Support rates are similar for NGOs with 86% (191 replies) and 80% (178 replies) agreeing strongly or somewhat, respectively. Contrary to this, 32% of businesses and their associations disagree somewhat or strongly that marketing techniques should restricted unless the products they relate to are of high nutritional standard (81 replies) and only 24 strongly or somewhat agree (60 replies). Sentiments diverge similarly on the question whether sponsorship activities that result in advertising during big events (e.g. sports events) should be restricted for products high in saturated fat, salt or sugars. Whereas 90% of the citizens (1,827 replies) and 82% of NGOs (182 replies) responding to the public consultation agree strongly or somewhat, 23% of businesses and their associations (54 replies) disagree strongly, and another 7% disagree somewhat (18 replies), while only 26% agree somewhat or strongly (65 replies).

Greater knowledge might be necessary to enable all actors to achieve the transition towards greater sustainability in the food system. About 43% of respondents (1139 replies) state that food system actors do not have sufficient knowledge and skills to achieve the transition to sustainable food systems, while 21% (549 replies) state the contrary. However, 30% of respondents (808replies) indicate not knowing whether this is the case, and 6% (173 replies) do not take a position. Yet, 56% of respondents (1493 replies) state that some actors of the food system are better prepared for the transition than others.