

EU farm and food products: review of policy on promotion inside and outside the EU

EuroHealthNet's feedback to the EC Roadmap consultation¹

March 2021

EuroHealthNet welcomes the EC's commitment to review the EU promotion policy for agricultural products. We strongly support a comprehensive, ambitious, and truly transformative transition to European food systems that put public and planetary health, sustainability, and social equity at the centre. EU's policy for the promotion of agricultural products should be no exception.

“Current food consumption patterns are unsustainable from both health and environmental points of view. While in the EU, average intakes of energy, red meat, sugars, salt and fats continue to exceed recommendations, consumption of whole-grain, cereals, fruit and vegetables, legumes and nuts is insufficient”.
(EU Farm to Fork Strategy)

Today's food systems are perpetuating and driving up health inequalities. Unhealthy diets and alcohol consumption – a major contributor to a Non-Communicable Diseases (NCDs) pandemic - are already responsible for more than 950,000 deaths and 16 million DALYs² lost in the EU³. It is positive that the new EU food systems framework – the EU Farm to Fork Strategy and its Action Plan - aims to advance a comprehensive sustainable food systems transition meant to *“bring environmental, health and social benefits, offer economic gains and ensure that the recovery from the crisis puts us onto a sustainable path.”*

To this end, a pivotal role for a modern, fit-for-purpose EU promotion policy for agricultural products will be in supporting food environments where *“a healthy and sustainable choice is an easy choice”* for all, and where the agricultural sector is sufficiently geared towards this transition in line with the EU Green Deal's ambitions. ‘Business as usual’ of focusing on the sector's competitiveness is not an option, not compatible with the EU's public health obligations under the TFEU⁴, UN Agenda for Sustainable Development and its Goals, as well as several new EU's flagship initiatives, such as Europe's Beating Cancer Plan and the European Pillar of Social Rights. Public money distributed via EU funds should not pay for activities that undermine the advancement of

¹<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12782-Information-and-promotion-measures-for-agricultural-and-food-products-in-the-internal-market-and-in-non-EU-countries>

² Disability Adjusted Life Years, a measure of overall disease burden, expressed as the number of years lost due to ill-health, disability or early death.

³ http://www.healthdata.org/sites/default/files/files/policy_report/2019/GBD_2017_Booklet.pdf

⁴ Treaty on the Functioning of the European Union, notably Article 168(1): *“A high level of human health protection shall be ensured in the definition and implementation of all Union policies and activities.”*

EU public health objectives, such as NCDs prevention or environmental health. International evidence links consumption of red and processed meat⁵ and alcohol with a heightened risk of NCDs, cancers notably⁶. While sugar and tobacco have been systematically phased out from agricultural support measures⁷, meat and alcohol production are still eligible for EU-sponsored 'promotion' on external/European markets.

Given the above, we recommend to:

- **re-focus the policy scope on promotion and information measures** in support of sustainable agricultural production and consumption, in line with the Farm to Fork Strategy and Europe's Beating Cancer Plan, supporting consumers to choose and adopt healthier diets.
- **investigate using promotion funds to support 'alternative' modes of agricultural production** via local, rural, (peri)urban, and/or short supply or organic models.
- **review the conditionality and eligibility criteria** to incentivise applicants to demonstrate concrete support to the Farm to Fork Strategy's relevant objectives (especially healthy diets and climate change ones). We would be in favour of dedicating the promotion funds to health-promoting yet under-consumed (ideally minimally processed) products such as *"whole-grain, cereals, fruit and vegetables, legumes and nuts"*.
- **consider excluding certain sectors from promotional funds**, notably those with scientifically demonstrated incompatibility with the NCD prevention logic (red meat, alcoholic drinks). Of course, adverse impacts can be expected in rural communities or areas resulting from the possible ineligibility of some products from promotion programmes. We call for further impact assessment of such eventuality, including how other EU funds could be used to mitigate potential income losses and incentivise the transition to 'eligible' production.

EuroHealthNet is the European Partnership for improving Health, Equity and Wellbeing. We are active in policy, practice and research. Our unique focus is on reducing health inequalities through action on the social determinants of health, integrating sustainable development goals, and contributing to the transformation of health systems. The main members of the partnership are authorities and statutory bodies responsible for public health, health promotion and disease prevention at national, regional and local level.

For further information and references visit www.EuroHealthNet.eu

⁵ https://www.iarc.who.int/wp-content/uploads/2018/07/pr240_E.pdf

⁶ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7071474/>

⁷ <https://pubmed.ncbi.nlm.nih.gov/30759616/>