

The Healthy Food Environment Policy Index (Food-EPI): European Union

An assessment of EU-level policies influencing food environments and priority actions to create healthy food environments in the EU

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The EU Food-EPI EU study is conducted as part of Work Package (WP) 1 of the Policy Evaluation Network (PEN) (<https://www.jpi-pen.eu/>), a JPI-HDHL-funded project (see Appendix 1 for more information about PEN WP 1 and its partners), in collaboration with the International Network for Food and Obesity/Non-communicable Diseases Research, Monitoring and Action Support (INFORMAS, informas.org).

This study was granted ethical approval by the Science-Geosciences Ethics Review Board (SG-ERB), Utrecht University, The Netherlands (ERB Review Geo L-19254).

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Executive Summary

Overweight, obesity and diet-related non-communicable diseases (NCDs) are a major public health challenge in Europe. Suboptimal diets are key contributors to increasing the risk of these diseases and thereby affect the health and economic systems of all European Member States. In addition, in most European countries socioeconomic inequalities in obesity and dietary patterns are evident.

Population diets are influenced by food environments in European Member States. Food environments are the physical (food availability, quality, marketing), economic (food prices), policy (rules and food policies) and sociocultural (norms and beliefs) surroundings, opportunities and conditions that influence people's food choices and nutritional status. Food environments do not always ensure that the healthy food option is the easiest or default option.

Government policies have the potential to support the promotion of healthy diets, empower populations to make healthier choices and reduce levels of overweight, obesity and NCDs by creating supportive food environments. Yet, little is known on how European Union (EU)-level policies affect national food environment policies in EU Member States. Also, little is known on how the EU could improve its policies to create healthy food environments in EU Member States.

The aims of this research, applying the EU Healthy Food Environment Policy Index (Food-EPI), are:

1. To provide an overview of EU-level policies with a direct or indirect (potential) influence on food environments;
2. To assess the strength of EU-level policies and infrastructure support and identify implementation gaps, by non-government, independent experts;
3. To identify and prioritise policy and infrastructure support actions to create healthy food environments in the EU taking into account importance, achievability and equity, by non-government, independent experts.

Approach

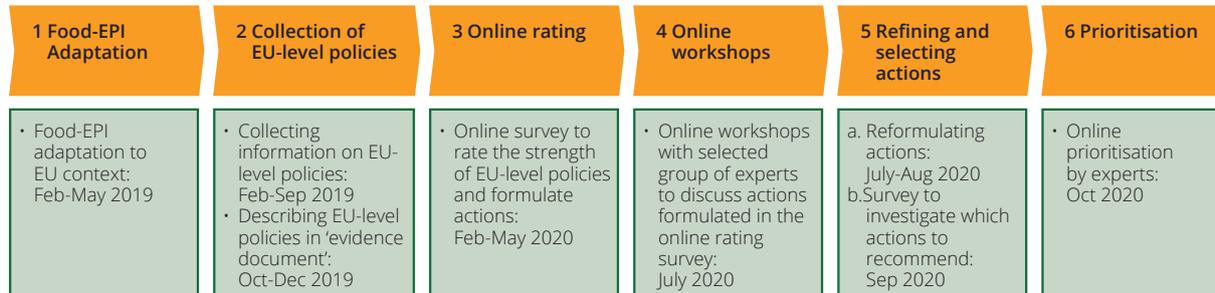
This study applied the Healthy Food Environment Policy Index (Food-EPI), **a tool and process**, developed by the International Network for Food and Obesity/Non-communicable Diseases Research, Monitoring and Action Support (INFORMAS), to assess the strength of EU-level policies that impact on Member State food environments and identify and prioritise policy and infrastructure support actions to create healthy food environments in EU Member States.

The Food-EPI **tool** includes seven policy domains that represent key aspects of food environments (food composition, food labelling, food promotion, food prices, food provision, food retail, and food trade and investment). In addition, the Food-EPI tool is comprised of six infrastructure support domains (leadership, governance, funding and resources, monitoring and intelligence, platforms for interaction and health-in-all-policies). Each domain is specified by several good practice indicators (50 in total) that encompass the directions necessary to improve the healthiness of food environments and to help prevent obesity and diet-related NCDs.

As outlined in Figure 1, the EU Food-EPI 2019-2020 is a six step **process**. In step 1 and 2, the Food-EPI was adapted to the EU context and evidence on EU-level policies was collected and verified by EU governmental officials. In step 3, independent experts assessed the strength of EU-level policies

influencing food environments. In step 4 to step 6, actions for EU-level policies to create healthy food environments have been identified and prioritised.

Figure 1 Steps of the EU Food-EPI 2019-2020 process



Expert panel

The EU Food-EPI expert panel consisted of 29 independent experts, specialized in public health, nutrition, food- or health policy, obesity or chronic diseases, and working in academia, health and food organisations, health professional associations and national health institutes. For each of the 50 good practice indicators, the panel rated the strength of existing EU-level policies, using the 'evidence document', i.e. an overview of EU-level policies influencing food environments and infrastructure support that helps facilitate effective policy implementation (available via this [link](#)). This 'evidence document' was validated by EU governmental officials.

Subsequently, the experts identified in total 19 policy actions and 18 infrastructure support actions to recommend to the EU to create healthy food environments, improve population nutrition, and reduce overweight, obesity and NCDs and their related inequalities. The 19 policy actions were ranked by the experts on importance, achievability and equity. The 18 infrastructure support actions were ranked by the experts on importance and achievability.

Priority recommendations

The assessment of the strength of EU-level policies and infrastructure support by the independent, non-government experts in this study shows there is a lot of potential for the EU to improve its policies and infrastructure support influencing food environments. With respect to the policy domains, 12% of the policy indicators was rated to be 'moderate', 65% was rated to be 'weak', and 23% was rated to be 'very weak'. Regarding the infrastructure support domains, 4% of the indicators was rated as 'strong' (related to 'public access to nutrition information'), 63% was rated to be 'moderate' and 33% was rated to be 'weak'.

Based on our study, **we recommend the EU to take immediate action** on the five recommended policy actions which were prioritised highest on a combination of importance and achievability and are also most likely contributing to a reduction of socioeconomic inequalities in diet.

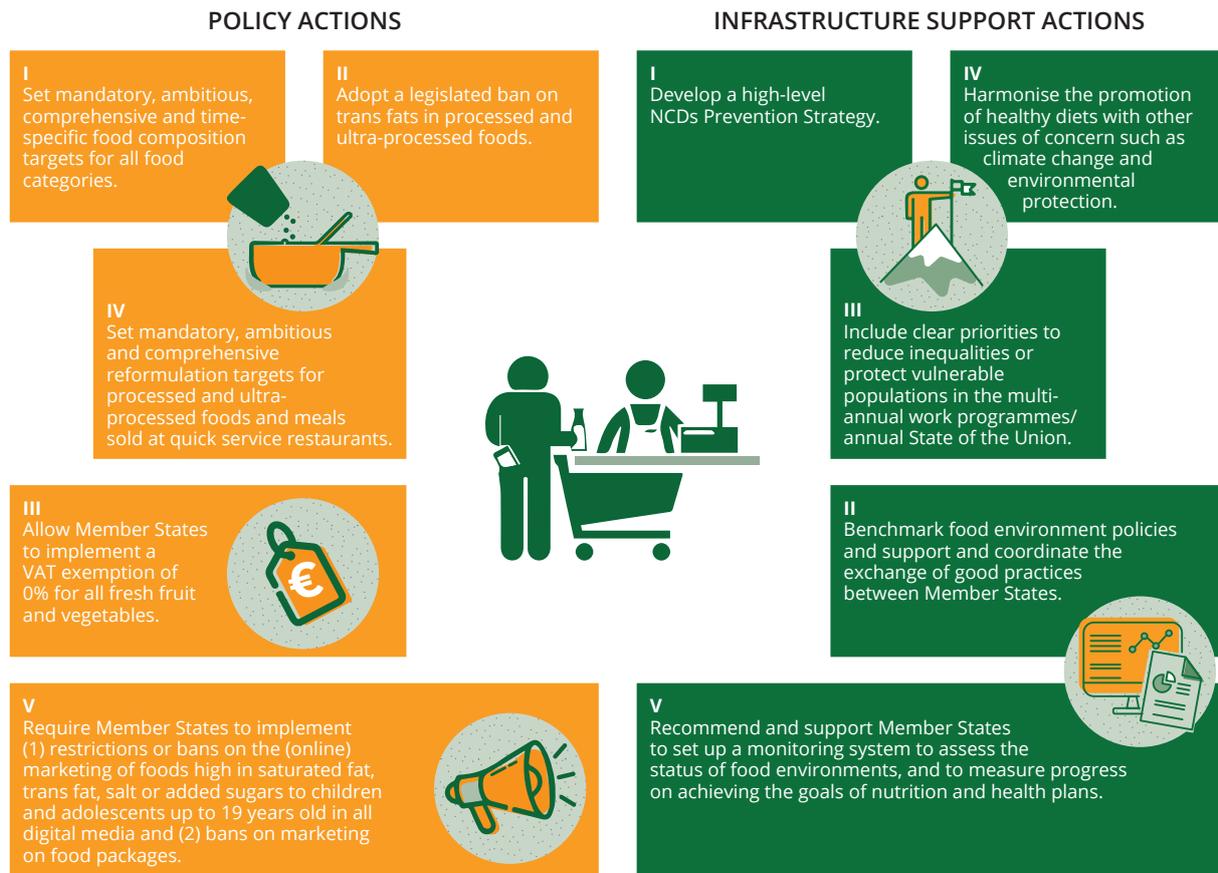
These five priority policy actions (also depicted in summary in Figure 2) are:

- I Set mandatory, ambitious, comprehensive and time-specific food composition targets for added sugars, salt, and saturated fat for all food categories (including processed and ultra-processed foods) sold in EU Member States.
- II Adopt a legislated ban on trans fats (i.e. no trans-fats are allowed instead of the maximum limit of 2 grams per 100 grams of fat) in processed and ultra-processed foods sold in EU Member States.
- III Allow Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables and encourage Member States to implement this VAT exemption to encourage healthy food choices.
- IV Set mandatory, ambitious and comprehensive reformulation targets for added sugars, salt, and saturated fat for processed and ultra-processed foods and meals sold at quick service restaurants.
- V Require Member States to implement (1) minimum and time-based restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old in all digital (including broadcast, online and social) media and (2) bans on food packages for marketing foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old.

Based on this study, **we also recommend the EU to take immediate action** on the five recommended infrastructure support actions which were prioritised highest on a combination of importance and achievability. **These five priority infrastructure support actions** (also depicted in summary in Figure 2) are:

- I Develop a high-level EU Non-Communicable Diseases (NCDs) Prevention Strategy.
- II Benchmark food environment policies regarding food reformulation, food labelling, food marketing, food prices, food provision in public spaces and retail, and support and coordinate the exchange of good practices between Member States.
- III Include clear priorities to reduce inequalities or protect vulnerable populations in the multi-annual work programmes/annual State of the Union.
- IV Harmonise the promotion of healthy diets with other issues of concern such as climate change and environmental protection.
- V Recommend and support Member States to set up a monitoring system to assess the status of food environments, and to measure progress on achieving the goals of nutrition and health plans.

Figure 2 Priority policy and infrastructure support actions to create healthy food environments in the EU



Acknowledgments

Many people have contributed to the development of this EU Food-EPI report.

We would like to thank all EU governmental officials who verified the evidence document which was used for the assessment of EU-level policies influencing food environments ([evidence document](#)), in November-December 2019. The evidence document was validated for completeness and accuracy. We would like to especially thank Jan Wollgast (European Commission/JRC) and Artur Furtado (European Commission/DG SANTE) for their time and efforts to verify this document.

We would like to thank all experts who participated in the EU Food-EPI expert panel and rated the strength of current EU-level policies, formulated policy and infrastructure support actions to improve food environments in the EU, and prioritised the final list of recommended actions (see Appendix 2 for an overview of the expert panel).

We would especially like to thank Dr. Herman Lelieveldt (University College Roosevelt, the Netherlands), Dr. Jeroen Candel (Wageningen University and Research, the Netherlands), and Mr. David Patterson (Global Health Law Groningen Research Centre, Faculty of Law University of Groningen, the Netherlands) for their participation in the online workshops to discuss the actions formulated by the EU Food-EPI expert panel.

This research is part of the Policy Evaluation Network (PEN)¹, Workpackage 1: <https://www.jpi-pen.eu/structure/work-packages.html>. We would like to acknowledge our PEN WP1 colleagues (see Appendix 1) and INFORMAS in the realisation of the research framework (Food-EPI domains and indicators) included in this document. PEN is funded by the Joint Programming Initiative: a Healthy Diet for a Healthy Life (JPI-HDHL): <https://www.healthydietforhealthylife.eu/>, a research and innovation initiative of EU Member States and associated countries.

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The contents of this published material are solely the responsibility of the authors.

1 Introduction

1.1 Why do we need to improve food environments in the EU?

Overweight, obesity and diet-related non-communicable diseases (NCDs) pose a major public health challenge in Europe. In 2017, more than 50% of the adult population were overweight of which 15% were living with obesity in the European Union (EU).¹ Estimates on the prevalence of overweight and obesity among children, showed that about 7.1 million boys and 7.8 million girls are living with overweight and obesity in Europe.² Overweight and obesity increase the risk of developing NCDs, such as type 2 diabetes, cardiovascular diseases, and some types of cancer.³

In the EU, approximately one third of the population aged 15 and over and nearly a quarter of the working age population lives with a non-communicable disease.⁴ NCDs are the leading cause of disability and death in Europe.⁵ More than half a million people under the age of 65 die of NCDs each year.^{4,6}

In the World Health Organization (WHO) European Region, NCDs account for an estimated 86% of the deaths and 77% of the disease burden in the Region.^{5,7} As the leading cause of mortality in the EU, NCDs account for most healthcare expenses, costing EU economies €115 billion, or 0.8% of GDP annually.⁶ The four major NCDs (cardiovascular disease, cancer, type 2 diabetes and chronic respiratory disease) in the EU claim at least 25% of the total health spending and they impose an important economic loss (almost 2% of gross domestic product).⁸

Unhealthy diets -rich in foods containing free sugar, saturated fat or salt (e.g. ultra-processed foods), and low in fresh nutritious foods like fruits, vegetables, legumes, nuts and whole grains- increase the risks of NCDs.⁹⁻¹³ In general, European diets are not in line with recommendations for healthy diets.¹⁴ In 2017, 36% of the EU population ate fruit less than once a day or not at all during a typical week. Vegetables were not consumed by 36% of the EU population on a daily basis.¹⁵ In turn, the average European will consume nearly one kilogram of sugar every month¹⁶ and daily salt intake in most European countries is 7-18 gram (g)/day, with no Member States meeting recommended levels of maximum 5g of salt a day¹⁷. Furthermore, the intake of saturated fat is generally higher than the recommended 10% of total energy (%E) with mean intakes ranging from 8.9 to 15.5%E across 24 European countries and with only two countries with intakes below the recommended 10%E.¹⁸

It is well understood that dietary behaviours are not merely the result of individual decisions, but result from a myriad of factors (e.g. social, cultural, environmental)¹⁹⁻²² and are strongly influenced by the food environment.²³ The food environment is characterized by the physical (food availability, quality, marketing), economic (food prices), policy (rules and food policies) and sociocultural (norms and beliefs) surroundings, opportunities and conditions that influence people's food choices and nutritional status.²⁴ Contemporary food environments of European Member States do often not ensure that the healthy option is the easiest option.¹⁴

1.2 Are there inequalities in terms of dietary risks?

There is growing concern about the level of socioeconomic health inequalities worldwide. In most European countries obesity is more prevalent among people with a lower socioeconomic status (SES) than higher SES²⁵ and inequalities in obesity have been widening in most countries in the past decades²⁶. Inequalities in dietary intake between lower and higher socioeconomic groups are

observed in most European countries and increase socioeconomic health inequalities.²⁷⁻³⁵ People with a higher education level have healthier diets than those with a lower educational level and, for example consume more fruit and vegetables, low fat dairy, and less meat and their diet consist of more unsaturated fat instead of saturated fat than people with lower education levels in northern and central European countries.^{28,29,36} The share of the EU population eating at least five portions of fruit and vegetables also rises with increasing income.³⁶ Furthermore, a study conducted in eight European countries has shown that children of parents with a lower SES in all countries studied (except Sweden) were more likely having a 'ultra-processed' dietary pattern characterised by high intake of foods such as fast food, savoury pastries, sweetened drinks, biscuits, ice cream or chocolates than those with a higher SES.³¹ Another study in nine European countries also indicated that people with a lower SES consume more (saturated) fat than people with a higher SES.³⁴

1.3 Who can help to create healthy food environments and improve population diets?

Government policies have the potential to support healthy diets and reduce levels of overweight, obesity and NCDs by creating supportive food environments for making healthy choices, such as regulating food marketing or reducing the price of fruits and vegetables.³⁷⁻⁴⁰ Although prior attempts, the market has failed to deliver optimal health benefits for the population because commercial interests have been allowed to prevail over public health.⁴¹ To create supportive food environments, it is essential for governments to take decisive actions and develop policies to prevent and halt the rise in diet-related overweight, obesity and NCDs.³⁷ Until now, governments have typically relied on 'downstream' approaches, including health information and education campaigns, that require the capacity and conscious action of individuals to change food consumption themselves. Interventions which result in structural 'upstream' changes to the food environment, such as regulations requiring food producers to reduce the trans-fat level of their products, can be more effective in improving population nutrition by supporting individuals to make spontaneous healthy food choices.^{42,43} Such structural policies are more likely to result in sustainable changes to food consumption and have the potential to improve the availability, affordability, acceptability and accessibility of healthy diets for the most vulnerable groups.³⁰ As a result, structural food environment policies, together with policies in other areas, may help to close the gap in inequalities in dietary intake and health.^{30,44,45}

1.4 How do EU-level policies affect food environments?

Article 168 of the Treaty on the Functioning of the European Union prescribes that a high level of human health protection shall be ensured in the definition and implementation of all EU policies and activities.⁴⁶ However, Member States are primarily responsible for the definition of their health policy and for the organization and delivery of health services and medical care.⁴⁷ The European Commission's Directorate-General for Health and Food Safety (DG SANTE) supports the efforts of EU countries through various means, including proposing legislation, providing financial support, coordinating and facilitating the exchange of best practices between EU countries and health experts, and health promotion activities. While one of the missions of DG SANTE is to 'improve and protect human health', EU action is thus mainly linked to incentive measures, e.g. raising awareness to prevent NCDs and promoting good health and cooperation measures.⁴⁸ A snapshot of the implementation of the WHO European Food and Nutrition Action Plan 2015-2020 among Member States in the WHO European Region shows that more ambitious policies should be implemented for countries to achieve global nutrition targets.⁴⁹ For instance, policies regarding consumer-friendly front-of-package labelling and restrictions on marketing of foods to children require further attention. Currently, little is known on how EU-level policies affect national food environment policies, and

in turn, affect food environments in EU Member States. Little is also known on how the EU could improve its policies to support improvement of Member State food environments. Therefore, this study applied the Healthy Food Environment Policy Index (Food-EPI), a tool and process, developed by the International Network for Food and Obesity/Non-communicable Diseases Research, Monitoring and Action Support (INFORMAS) (<https://www.informas.org/modules/public-sector/>) to assess government policies, and to identify and prioritise policy and infrastructure support actions for creating healthy food environments.³⁷ The Food-EPI has already been applied in more than twenty countries, while this is the first Food-EPI study at EU level.

1.5 Aims of this research

The aims of this research, applying the EU Healthy Food Environment Policy Index (Food-EPI), are:

1. To provide an overview of EU-level policies with a direct or indirect (potential) influence on food environments;
2. To assess the strength of EU-level policies and infrastructure support and identify implementation gaps, by non-government, independent experts;
2. To identify and prioritise policy and infrastructure support actions to create healthy food environments in the EU taking into account importance, achievability and equity, by non-government, independent experts.

Important terms used in this report are described in Appendix 3.



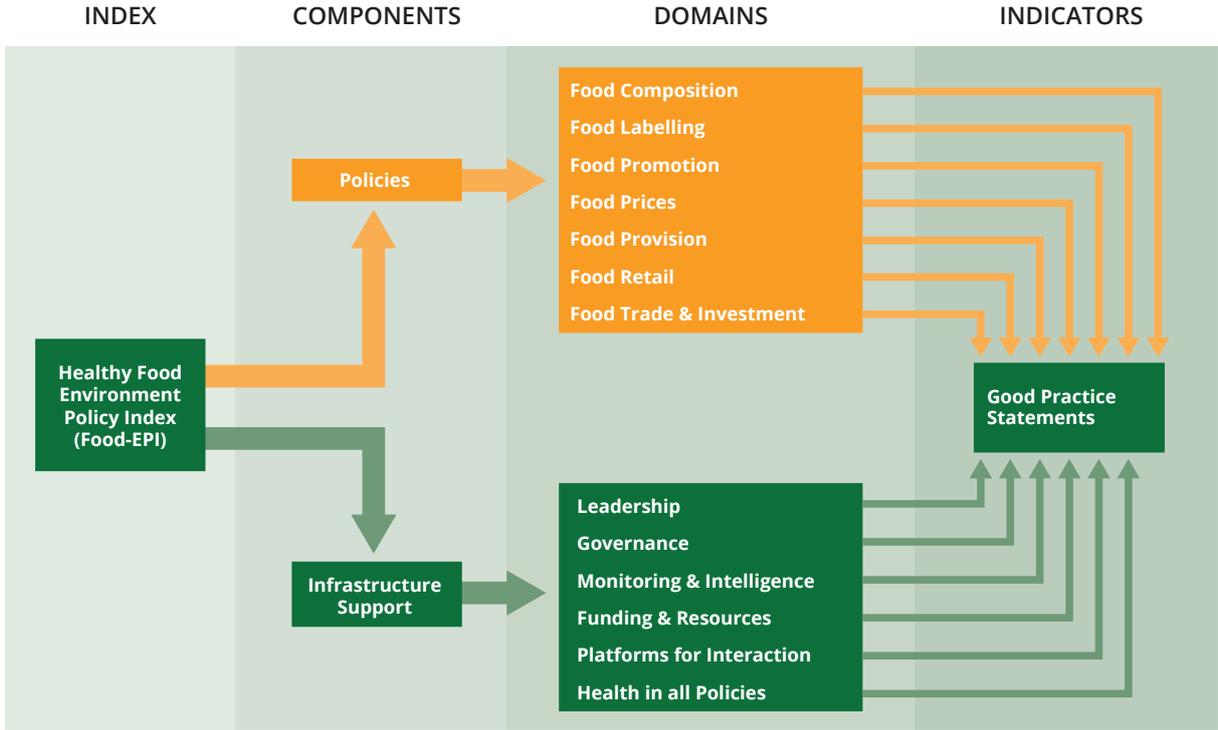
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2 Methods: How were EU-level policies and infrastructure support influencing food environments assessed?

2.1 An introduction to the Food-EPI

The Food-EPI includes seven policy domains that represent key aspects of food environments (food composition, food labelling, food promotion, food prices, food provision, food retail, and food trade and investment) that can be influenced by governments to facilitate the accessibility, availability, acceptability and affordability of foods contributing to a healthy diet.³⁷ In addition, the Food-EPI is comprised of six infrastructure domains (leadership, governance, funding and resources, monitoring and intelligence, platforms for interaction and health-in-all-policies), which are based on the WHO building blocks for health systems, and facilitate policy development and implementation to create healthy food environments (Figure 3).⁵⁰

Figure 3 The Healthy Food Environment Policy Index (Food-EPI)



Detailed descriptions of each domain are available in Figure 4 and Figure 5. There are 50 good practice indicators contained in each of the domains that encompass the necessary directions to improve the healthiness of food environments and to help prevent obesity and diet-related NCDs (see Appendix 4).

Figure 4 The Food-EPI Policy Domains

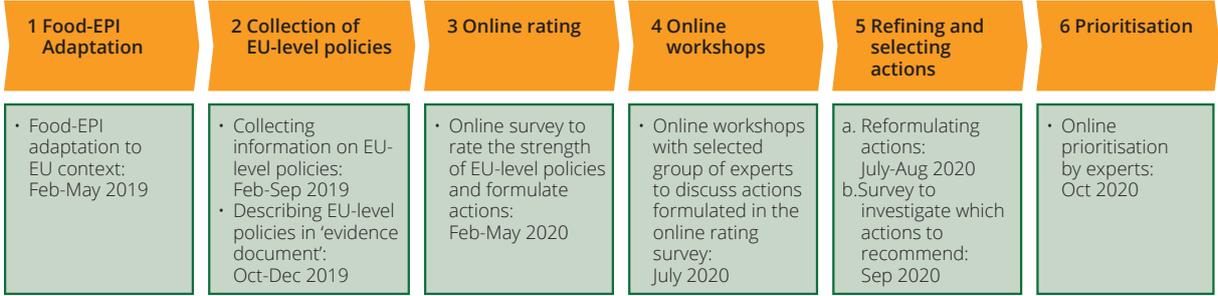
POLICY DOMAINS	
	FOOD COMPOSITION: This domain concerns the extent to which the EU stimulated/ proposed/developed/implemented systems to ensure that, where practicable, processed foods minimise the energy density and the nutrients of concern (salt, saturated fat, trans fat, added sugar).
	FOOD LABELLING: This domain concerns the extent to which the EU proposed/ developed a regulatory system for consumer-oriented labelling on food packaging and menu boards in restaurants to enable consumers to easily make informed food choices and to prevent misleading claims.
	FOOD PROMOTION: This domain concerns the extent to which the EU has set/ proposed policies to reduce the impact (exposure and power) of promotion of unhealthy foods to children including adolescents across all media. <ul style="list-style-type: none"> • Exposure of food marketing concerns the reach and frequency of a marketing message. This is dependent upon the media or channels, which are used to market foods. • The power of food marketing concerns the creative content of the marketing message. For example, using cartoons or celebrities enhances the power (or persuasiveness) of a marketing message because such strategies are attractive to children.
	FOOD PRICES: This domain concerns the extent to which food pricing policies (e.g., taxes and subsidies) are aligned with health outcomes by helping to make the healthy eating choices the easier, cheaper choices.
	FOOD PROVISION: This domain concerns the extent to which the EU ensures that there are healthy food service policies to be implemented by Member States in government-funded settings to ensure that food provision encourages healthy food choices, and the extent to which the EU actively encourages and supports private companies to implement similar.
	FOOD RETAIL: This domain concerns the extent to which the EU has the power to set/ propose policies and programs to be implemented by Member States to support the availability of healthy foods and limit the availability of unhealthy foods in communities (outlet density and locations) and in-store (product placement).
	FOOD TRADE & INVESTMENT: This domain concerns the extent to which the EU ensures that trade and investment agreements protect food sovereignty, favour healthy food environments, are linked with domestic health and agricultural policies in ways that are consistent with health objectives, and do not promote unhealthy food environments.

Figure 5 The Food-EPI Infrastructure Support Domains

INFRASTRUCTURE SUPPORT DOMAINS	
	LEADERSHIP: This domain concerns the extent to which political leadership ensures that there is strong support for the vision, planning, communication, implementation and evaluation of policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.
	GOVERNANCE: This domain concerns the extent to which the EU has structures in place to ensure transparency and accountability, and encourage broad community participation and inclusion when formulating and implementing policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.
	MONITORING & INTELLIGENCE: This domain concerns the extent to which the EU's monitoring and intelligence systems (surveillance, evaluation, research and reporting) are comprehensive and regular enough to assess the status of food environments, population nutrition and diet-related NCDs and their inequalities, and to measure progress on achieving the goals of nutrition and health plans.
	FUNDING & RESOURCES: This domain concerns the extent to which the EU has sufficient funding invested in 'Population Nutrition Promotion' (estimated from the investments in population promotion of healthy eating and healthy food environments for the prevention of obesity and diet-related NCDs, excluding all one-on-one promotion (primary-care, antenatal services, maternal and child nursing services etc.), food safety, micronutrient deficiencies (e.g. folate fortification and undernutrition)) to create healthy food environments, improve population nutrition, and reduce obesity, diet-related NCDs and their related inequalities.
	PLATFORMS FOR INTERACTION: This domain concerns the extent to which there are coordination platforms and opportunities for synergies across EU departments, levels of government, and other sectors (NGOs, private sector, and academia) such that policies and actions in food and nutrition are coherent, efficient and effective in improving food environments, population nutrition, diet-related NCDs and their related inequalities.
	HEALTH IN ALL POLICIES: This domain concerns the processes that are in place to ensure policy coherence and alignment, and that population health impacts are explicitly considered in the development of EU policies.

As outlined in Figure 6, the overall EU Food-EPI process was conducted over the period 2019-2020. A mixed-methods design was used to obtain the ratings on the strength of EU-level policies and infrastructure support and to identify and prioritise concrete actions for the EU towards healthy food environments in the EU.

Figure 6 Steps of the EU Food-EPI 2019-2020 process



2.2 The expert panel

At the end of 2019 and the beginning of 2020, 62 invitations were sent to independent, non-government experts specialized in public health, nutrition, food- or health policy, obesity or chronic diseases to participate in our EU Food-EPI expert panel. In total, 29 experts fully participated in the online rating survey (step 3), 16 experts participated in the second online survey to indicate which actions to recommend to the EU (step 5b), and 21 experts participated in the online prioritisation survey (step 6). All experts consented to take part in the panel and declared potential conflicts of interest. Representatives from industry were not included in the Food-EPI process. Appendix 2 includes the names and/or organisations of the experts who consented to include this information.

2.3 Step 1: Adaptation of the tool

Before using the Food-EPI in the European context, a group of researchers (PEN WP1 partners) consulted with several experts and participating researchers within each country participating in PEN (and in another EU consortium STOP¹), to gain insight into whether the 47 original good practice indicators needed to be adjusted before applying them to (countries in) Europe. Following this exercise, some indicators have been disaggregated or added, making a total of 50 indicators in the PEN Food-EPI comprising of 26 policy and 24 infrastructure support indicators. As the indicators were originally developed for assessing government policies at national level, we additionally adapted the formulation to the EU context for the purpose of this specific study. Reviewing and updating of the indicators was conducted between February and May 2019.

2.4 Step 2: Collection of EU-level policies in an 'evidence document'

For each of the 50 good practice indicators, evidence for the existence and degree of implementation of policies has been collected by a team of researchers, through searching for and reading EU policy

¹ Under the umbrella of INFORMAS, this deliverable of PEN will be complemented by a concurrent project entitled the STOP (Science and Technology in childhood Obesity Policy) through which an additional five countries (Slovenia, Spain, Portugal, Estonia, Finland) plan to complete the Food EPI by 2024.

documents. All policies identified at the EU level with a potential influence on food environments in EU Member States have been summarized in the so-called 'evidence document' (via [link](#))⁵¹. This document was compiled in October-December 2019 and summarized policy actions that the European Commission has taken relating to the food environment up until 2 December 2019. This document has been verified for completeness and accuracy by EU governmental officials working at DG SANTE, the Joint Research Centre (JRC), Eurostat, the OECD, and the European Food and Safety Authority (EFSA). The EU Farm to Fork Strategy which has been published in 2020¹⁴, was not included in the evidence document. However, the actions formulated in the EU Food-EPI (during step 4 and 5) have been aligned with this Strategy.

2.5 Step 3: Online rating survey

The strength of EU-level policies was assessed during an online rating survey in February-March 2020. A total of 31 experts filled out the online rating survey, of which 29 experts entirely and two experts partly completed the survey.

The EU evidence document was sent to the experts and used to rate the strength of the EU-level policies for each indicator. Before rating each indicator, the experts were provided with instructions and the evidence document. In the online rating survey, participants were instructed to assess the 26 policy and 24 infrastructure support indicators using a five-point Likert scale. For each indicator, they indicated whether 'The EU has put forward....', 1= a very weak policy, 2= a weak policy, 3= a moderate policy, 4= a strong policy, 5= a very strong policy. There was also a 'cannot rate' option. This is a different approach than in the national Food-EPI's, as we did not ask experts to benchmark the implementation of EU-level policies against international best practices of countries. The rationale for this is that the EU is a unique economic and political union, which has a different position and different power than individual countries. In this survey, experts were asked to formulate actions for the European Union on the policy and infrastructure support domains that, in turn, would improve food environments in the EU.

The mean score on each indicator was calculated and used to determine the strength of EU-level policies with respect to the 50 policy and infrastructure support indicators. The proposed actions of the experts were compiled and taken forward to the next step of the Food-EPI process (Figure 6, step 4).

2.6 Step 4 to Step 6: Process to identify and prioritise actions to create healthy food environments in the EU

Steps 4 to 6 of our study (see Figure 6) concerned the identification and prioritisation of EU policy and infrastructure support actions to create healthy food environments in the EU:

- *Step 4 Online workshops:* Due to the 2020 Covid-19 restrictions on travel and social distancing, the workshops were conducted online and only with a select group of European food/health/law experts (N=3). During two online meetings (of each three hours) in July 2020, all actions formulated by the experts in the online rating survey were discussed to narrow down and precisely formulate the actions. Also it was discussed which actions align with the EU Green Deal Farm to Fork Strategy (i.e. which actions support the strategy and which actions could strengthen the strategy). The experts were consulted if they agreed with the formulation of the actions, if the actions aligned with the EU competences and if there were actions missing on the list.

- *Step 5a Refining actions:* Based on the online workshops, we adjusted the formulation of the actions according to the input received of the experts. This list with actions was then sent to the three experts who participated in the online workshops for verification. Following this verification, the action list was sent to all original participants of the online rating survey for final verification. The experts were asked if they agreed with the actions formulated and if any actions were missed. The research team made final adjustments to the list of actions according to the expert panel input. A final list of 30 policy actions and 32 infrastructure support actions (see Appendix 5) were proposed for the next round.
- *Step 5b Online survey to investigate which actions to recommend to the EU:* After refining the actions, we invited all original participants of the first online rating survey to indicate via a second online survey (September 2020) how much they would agree or disagree with recommending each of the 62 formulated actions to the EU, using a five-point Likert scale: 1) very much disagree 2) disagree 3) neutral 4) agree 5) very much agree. A total of 16 experts participated in this survey. Actions which had a mean score of 4.0 or higher were taken forward to the next step, leading to a list of 19 policy actions and 18 infrastructure support actions.
- *Step 6 Prioritisation:* In the third and final online survey (September-October 2020) we invited all original participants of the first online rating survey to prioritise the recommended actions by ranking the 19 policy actions on relative importance, achievability and equity, and by ranking the 18 infrastructure support actions on relative importance and achievability. As policies can contribute to reducing inequalities in dietary intake, it is vital to consider the impact on inequalities when developing and implementing policies.³⁰ Therefore, experts were asked to consider the equitability of proposed policy actions in addition to importance and achievability for policy actions only. Experts received instructions for how to rank the actions via the survey and prioritisation guide. The importance, achievability and equity criteria they used when ranking the actions can be found in Table 1. A total of 21 experts completed the prioritisation survey. Experts ranked the policy actions (from #1 to #19) three times: first on importance, second on achievability and finally on equity. Experts ranked the infrastructure support actions (from #1 to #18) twice: on importance and on achievability (infrastructure support actions were not ranked on equity). When a recommended action was ranked as #1 it was considered to be most important, achievable or equitable and when a recommended action was ranked as #18/19 it was considered to be least important, achievable or equitable. To identify the actions recommended to the EU with the highest priority, we calculated the sum of the scores (rankings of all experts) for each action. First, we calculated the scores for importance and achievability separately. Second, we calculated the total score for each action taking the scores on both importance and achievability into account. The latter was used to determine the final ranking of policy and infrastructure support actions. The lower the sum core, the higher the action was ranked by the experts. Subsequently, we selected the top 10 prioritised actions for both the recommended policy and infrastructure support actions. For the policy actions, we also calculated the sum of the scores on equity for each action and determined which actions were perceived most effective to reduce socioeconomic inequalities in diet. Of the top 10 prioritised policy actions ranked on importance and achievability, we selected the five actions which scored highest on equity to recommend for immediate action to the EU. The five infrastructure support actions which ranked highest on importance and achievability are also recommended for immediate action to the EU.

Table 1 Criteria for ranking the policy and infrastructure support actions

Importance	Achievability	Equity
Need The size of the implementation gap.	Feasibility How easy or hard the action is to implement.	Socio-economic effect Progressive/regressive effects on reducing food/diet-related inequalities.
Impact The effectiveness of the action on improving food environments and diets (including reach and effect size).	Acceptability The level of support from key stakeholders including government, the public, public health and industry.	Structures vs. Individuals Extent to which a given policy requires environmental change rather than individual choices.
Other positive effects (e.g. on protecting rights of children and consumers).	Affordability The cost of implementing the action.	
Other negative effects (e.g. regressive effects on household income, infringement of personal liberties).	Efficiency The cost-effectiveness of the action.	



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3 Results: Strength of EU-level policies and infrastructure support influencing food environments in the EU

Figure 7 presents the expert's rating of the strength of EU-level policies and infrastructure support on each of the Food-EPI indicators (Step 3). It can be observed that none of the EU-level policies and infrastructure support with respect to all Food-EPI good practice indicators were rated as very strong. Only one of the 50 indicators was rated as strong (2%), which concerned public access to nutrition information. 18 of the 50 indicators were rated moderate (36%). Nevertheless, the majority of the indicators were rated weak, including 50% of the Food-EPI indicators (25 of the 50 indicators). EU-level policies with respect to six (12%) indicators (all in the policy domains) were rated as non-existent/very weak. Next, outcomes and insights will be discussed for the policy and infrastructure support domains separately.

Policy domains

None of the EU-level policies with respect to the Food-EPI policy domains were rated as (very) strong. The expert panel considered the strength of EU-level policies with respect to three of the 26 indicators (12%) in the policy domains to be moderate. These included EU-level policies in the *Food Composition* and *Food Labelling* domains: 'food composition targets for industrially processed foods', 'ingredient lists and nutrient declarations', and 'nutrition and health claims'.



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EU-level policies with respect to the majority of the policy indicators (17 of the 26 policy indicators; 65%) were rated weak (Figure 7). Yet, EU-level policies with respect to six of the 26 policy indicators (23%) (in the *Food Promotion*, *Food Prices*, *Food in Retail* domains) were rated very weak or as non-existent. EU-level policies with respect to 'restricting unhealthy food promotion to children on packaging' were considered very weak/to be non-existent. Likewise, EU-level policies with respect to 'increasing taxes or levies on unhealthy foods' were rated very weak/non-existent. Furthermore, ratings showed that there are no or very weak 'EU zoning laws and policies limiting the density or placement of quick service restaurants or other outlets selling mainly unhealthy foods' or 'zoning laws and policies encouraging the availability of outlets selling fruit and vegetables'. Similarly, the EU lacks or has very weak support systems to 'promote and encourage the relative availability of healthy foods in stores' and 'in food service outlets'.

Infrastructure support domains

None of the EU-level policies with respect to the Food-EPI infrastructure support domains were rated as very strong. Only one of the 24 infrastructure support indicators (4%) was rated as strong, namely 'public access to nutrition information' (part of the domain *Governance*). The majority of the infrastructure support indicators (15 out of the 24; 63%) were rated to be of moderate strength. (Figure 7).

The EU was assessed as having weak infrastructure support for eight of the 24 indicators (33%). These included four indicators in the *Leadership domain*, namely that the EU has weak infrastructure support with respect to 'clear population intake targets', 'food-based dietary guidelines', 'a comprehensive implementation plan for nutrition', and 'priorities for reducing health inequalities or protecting vulnerable populations'. Also, EU-level infrastructure support with respect to two indicators in the *Platforms for Interaction* domain were rated weak including 'platforms between the EU and the commercial food sector' and 'the EU and civil society'. Finally, EU-level infrastructure support with respect to the two indicators in the *Health-in-all policies* domain ('assessing and considering public health impacts of food-related policies' and 'non-food policies') were also considered to be weak. In contrast to the policy domains, no infrastructure support indicators were rated as very weak or non-existent.

Figure 7 Expert's rating of the strength of EU-level policies and infrastructure support influencing food environments in the EU

POLICY DOMAINS		No/very weak policy	Weak policy	Moderate policy	Strong policy	Very strong policy
Domain	Indicators					
Food Composition	Food composition targets industrially processed foods	[Moderate policy]				
	Food composition targets meals sold from food service outlets	[Weak policy]				
Food Labelling	Ingredient lists and nutrient declarations	[Moderate policy]				
	Nutrition and health claims	[Moderate policy]				
	Front-of-pack labelling	[Weak policy]				
	Menu board labelling	[Weak policy]				
Food Promotion	Restricting unhealthy food promotion to children (broadcast media)	[Weak policy]				
	Restricting unhealthy food promotion to children (online and social media)	[Weak policy]				
	Restricting unhealthy food promotion to children (non-broadcast media)	[Weak policy]				
	Restricting unhealthy food promotion in settings where children gather	[Weak policy]				
	Restricting unhealthy food promotion to children on packaging	[No/very weak policy]				
Food Prices	Minimizing taxes or levies on healthy foods	[Weak policy]				
	Increasing taxes or levies on unhealthy foods	[No/very weak policy]				
	Food subsidies to favour healthy foods	[Weak policy]				
	Food-related income-support for healthy foods	[Weak policy]				
Food Provision	Policies in schools and early childhood education services provide and promote healthy food choices	[Weak policy]				
	Policies in other public sector settings provide and promote healthy food choices	[Weak policy]				
	Public procurement standards to provide and promote healthy food choices	[Weak policy]				
	Support and training systems (schools and other public sector organisations) to help meet the healthy food service policies and guidelines	[Weak policy]				
	Support and training systems (private companies) to provide and promote healthy foods and meals	[Weak policy]				
Food Retail	Zoning laws and policies limit quick service restaurants or other outlets selling mainly unhealthy foods	[No/very weak policy]				
	Zoning laws and policies encourage outlets selling fruit and vegetables	[No/very weak policy]				
	Support systems to promote and encourage the relative availability healthy foods in-store	[No/very weak policy]				
	Support systems to promote and encourage the relative availability healthy foods in foods service outlets	[No/very weak policy]				
Food Trade	Risk impact assessments trade and investment agreements	[Weak policy]				
	Measures to manage investment and protect regulatory capacity	[Weak policy]				

INFRASTRUCTURE SUPPORT DOMAINS						
Domain	Indicators	No/very weak policy	Weak policy	Moderate policy	Strong policy	Very strong policy
Leadership	Strong visible political support					
	Clear population intake targets					
	Food-based dietary guidelines					
	Comprehensive implementation plan for nutrition					
	Priorities for reducing health inequalities or protect vulnerable populations					
Governance	Restricting commercial influence on policy development					
	Use of evidence in food and nutrition policies					
	Transparency in development of food and nutrition policies					
	Public access to nutrition information					
Monitoring & Intelligence	Monitoring food environments					
	Monitoring nutrition status and intakes					
	Monitoring overweight and obesity					
	Monitoring NCD risk factors and prevalence					
	Evaluation of nutrition and health programmes & policies					
	Monitoring progress towards reducing health inequalities or health impacts in vulnerable populations					
Funding & Resources	Population nutrition budget					
	Funded research targeted for improving food environments, reducing obesity, NCDs and their related inequalities					
	Statutory health promotion agency					
Platforms for Interaction	Coordination mechanisms (across departments and levels of governments)					
	Platforms between government and commercial food sector					
	Platforms between government and civil society					
	Systems-based approach with local, national and European organisations					
Health in all policies	Assessing and considering public health impacts of food-related policies					
	Assessing and considering public health impacts of non-food policies					

4 Results: Priority policy and infrastructure support actions to create healthy food environments in the EU

4.1 Recommended and priority policy actions

The 19 policy actions recommended by the experts are detailed in Table 2. Experts have ranked these actions twice, on importance and achievability. To identify the actions with the highest priority, we have listed the actions in order of ranking on a *combination* of importance and achievability in Table 2. The top 10 priority policy actions are shown in green. These are the EU-level policy actions perceived to be the most important and achievable to create healthy food environments in the EU. Each action is also plotted on importance and achievability in Figure 8, and the top 10 priority policy actions are shown in green.

Table 2 EU-level policy actions to create healthy food environments in the EU, recommended by the Food-EPI expert panel (listed in order of ranking on a combination of importance and achievability).*

	Domain	Action
1	FOOD LABELLING	Develop an EU easy-to-understand front-of-pack label (including a normative health statement) for Member States to implement for all product categories including the display on prepacked foods as well as on-shelf labelling for non-prepacked foods.
2	FOOD PRICES	Allow Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables, by adopting the proposal of the Commission ⁵² and encourage Member States to implement this VAT exemption to encourage healthy food choices.
3	FOOD COMPOSITION	Set mandatory, ambitious, comprehensive and time-specific food composition targets for added sugars, salt, and saturated fat for all food categories (including processed and ultra-processed foods) sold in EU Member States (e.g. saturated fat reduction for savoury snacks of a minimum of 5% in 4 years and a minimum of an additional 5% reduction by 2026 against the individual baseline levels at the end of 2020).
4	FOOD LABELLING	Develop and use a clear and evidence-based nutrient profiling system to prevent the use of nutrition and health claims (including function claims) on foods and meals high in saturated fat, trans fat, salt or added sugars.
5	FOOD COMPOSITION	Adopt a legislated ban on trans fats (i.e. no trans-fats are allowed instead of the maximum limit of 2 grams per 100 grams of fat) in processed and ultra-processed foods sold in EU Member States.
6	FOOD LABELLING	Adjust existing regulations (e.g. food information to consumers regulation EU No 1169/2011 ^{53,54} , added sugars annex ⁴⁹) to make the declaration of added or free sugars on prepacked foods mandatory.
7	FOOD COMPOSITION	Set mandatory, ambitious and comprehensive reformulation targets for added sugars, salt, and saturated fat for processed and ultra-processed foods and meals sold at quick service restaurants (including snack food outlets) in EU Member States.

8	FOOD PROMOTION	Introduce a new Directive, (amending the Audiovisual Media Services Directive (2010/13/EU ⁵⁵)), which requires Member States to implement (1) minimum and time-based restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old in all digital (including broadcast, online and social) media and (2) bans on food packages for marketing foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old.
9	FOOD PROMOTION	Ensure that the Digital Services Act creates a governance regime that enables Member States to maintain, adopt and enforce national legislation to minimise the exposure of children and adolescents up to 19 years old to foods high in saturated fat, trans fat, salt or added sugars.
10	FOOD PROMOTION	Develop and use a clear and evidence-based nutrient profiling system (e.g. such as the WHO nutrient profile model) to restrict the marketing (including online marketing) of processed and ultra-processed foods high in saturated fat, trans fat, salt or added sugars.
11	FOOD PROMOTION	Prohibit the sponsorship of foods high in saturated fat, trans fat, salt or added sugars from EU-wide sporting and other events with a legal or financial connection with the EU (e.g. events organized by the Union of European Football Associations (UEFA)).
12	FOOD PROVISION	Include minimum mandatory criteria for food procurement supporting healthy diets in schools, hospitals and public institutions, in addition to setting these criteria for sustainable food procurement as announced in the Farm to Fork Strategy.
13	FOOD PRICES	Encourage Member States to ensure that consumer food-related income support programs distribute mainly nutritious food products supporting a healthy diet (e.g. fruit and vegetables, dietary fibre), e.g. replacing the current provision about food support in the European Social Fund Plus from <i>"where appropriate the choice of food products to be distributed shall be made having considered their contribution to the balanced diet of the most deprived persons"</i> to <i>"ensure the choice of food products to be distributed is for nutritious food products supporting a healthy diet (e.g. fruit, vegetables, dietary fibre such as whole grains), and is not including foods high in trans fats, saturated fat, added sugars or salt, which contribute to a healthy diet of the most deprived persons"</i> .
14	FOOD PROVISION	Provide food service and procurement guidelines (e.g. "the European Sustainable and Healthy Public Food Procurement guide") to support healthy diets which also promote the role of public health dietitians/nutritionists to support public sector organisations and their caterers (e.g. by training staff, supporting the implementation of nutrition standards).
15	FOOD PRICES	Require Member States to implement the standard VAT rate of a minimum of 15% to foods high in trans fats, saturated fat, added sugars, by adding those foods to the list of goods and services (Annex IIIa of the current proposal on VAT rates ⁵²) to which the standard rate of minimum 15% must always be applied.
16	FOOD PROVISION	Amend the Public Procurement Directive to include specific clauses that relate to the provision and promotion of nutritious foods supporting healthy diets in public sector settings and support the implementation by Member States via guidelines and toolkits.
17	FOOD IN RETAIL	Elicit an EU-wide retail sector commitment to (1) remove ultra-processed and processed foods high in added sugars, salt, trans fat or saturated fat from near checkout counters and (2) ban (price) promotions of foods high in added sugars, salt, trans fat or saturated fat.

18	FOOD TRADE	Make health impact assessments mandatory for new trade agreements between the EU and third countries, including explicit references to the food environment and use this evidence and information when making decisions on trade policy.
19	FOOD TRADE	Continuously monitor the impact of trade agreements on the EU food environment, population nutrition and health (e.g. apply the European Precautionary Principle).

* The top 10 priority policy actions on a combination of importance and achievability are shown in green.

The top 10 priority policy actions

The top 10 priority policy actions include three actions in the *Food labelling* domain, one action in the *Food Prices* domain, three actions in the *Food Composition* domain and three actions in the *Food Promotion* domain. Each top 10 action is described in more detail below.

ACTION 1: EU easy-to-understand Front-Of-Pack (FOP) Label (Food Labelling)

The highest prioritised action is the development of an EU easy-to-understand front-of-pack (FOP) label (including a normative health statement). Experts agreed that such a FOP label has to be implemented for *all* product categories and that it has to be displayed on prepacked foods as well as via on-shelf labelling for non-prepacked foods. However, experts did not agree on the best way to implement such a FOP label. Some experts preferred the EU to develop a harmonised EU FOP label which would then be mandatory for Member States to implement. Others preferred the EU to *propose* a FOP label for Member States to be implemented, but to give Member States the freedom to adopt the FOP label towards their national dietary guidelines. Irrespective of its format, developing a EU *Front-Of-Pack (FOP) Label* is the number one priority policy action. Also in the Farm to Fork Strategy it is included that the Commission will develop a proposal for a harmonised mandatory front-of-pack nutrition labelling and that this has to be finalised at the end of 2022.¹⁴

ACTION 2: VAT exemption of 0% for fresh fruit and vegetables (Food Prices)

Prioritised second, is the recommended action to allow Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables. In the EU Farm to Fork Strategy an implementation of a VAT exemption for organic fruit and vegetables is mentioned by the Commission¹⁴, while the Food-EPI expert panel targets this exemption to all fruits and vegetables. There is already a proposal (of 2018) of the Commission to allow this VAT exemption.⁵² The experts recommended the EU to adopt this proposal and additionally see a role for the EU to encourage Member States to implement this VAT exemption to support healthy food choices.

ACTION 3: Mandatory food composition targets for all food categories (Food Composition)

The third priority action is to set mandatory, ambitious, comprehensive and time-specific food composition targets for added sugars, salt, and saturated fat for *all* food categories (including processed and ultra-processed foods) sold in EU Member States. Currently, the EU Framework for National Salt Initiatives and the Framework for National Initiatives on selected nutrients, with the Annexes on Saturated Fat and Added Sugars set voluntary targets to establish a benchmark for overall reduction of the nutrients of concern.^{56,57} Participation by Member States in these frameworks is voluntary. In the Farm to Fork Strategy it is included that the Commission will seek commitments from food companies and organisations to take concrete actions on for example reformulating food products in line with guidelines for healthy, sustainable diets.¹⁴ However, this is again a voluntary measure, while the Food-EPI expert panel recommends explicitly to set mandatory food composition targets.

ACTION 4: Nutrient profiling system for nutrition and health claims (Food Labelling)

The fourth priority action is to develop and use a nutrient profiling system to prevent the use of nutrition and health claims (including function claims) on foods and meals high in saturated fat, trans fat, salt or added sugars. Article 4 of the Regulation (EC) No 1924/2006 on Nutrition and Health Claims⁵⁸ prescribes that the Commission shall establish specific nutrient profiles by 19 January 2009. However, this has not happened. In the Farm to Fork Strategy it is included that the Commission will set up nutrient profiles to restrict the promotion (via nutrition or health claims) of foods high in fat, sugars and salt (Q4 2022).¹⁴ Nutrition Profiling Systems have already been developed and implemented in other parts of the world and can be used as examples for EU developments. For example, Australia and New Zealand apply Nutrient Profiling Scoring Criteria to determine whether a food is suitable to make a health claim.⁵⁹ Moreover, Mexico has a regulation which requires that products with warning labels (based on excessive in calories, free sugars, saturated fats, trans fats and sodium) or warning legends (contains non-sugar sweeteners or added caffeine) do not use health or nutrition claims.⁶⁰

ACTION 5: Legislated ban on trans fats (Food Composition)

Prioritised fifth, is the action to adopt a legislated ban on trans fats (i.e. no trans-fats are allowed instead of the current maximum limit of 2 grams per 100 grams of fat). In April 2019, the Commission already adopted an EU-wide legal limit for industrially produced trans fats (amending Annex III to regulation (EC) No 1925/2006⁶¹) but the Food-EPI experts recommend to totally ban trans fats in processed and ultra-processed foods sold in EU Member States. This would align with the WHO initiative REPLACE trans fat, aiming to eradicate trans fats from the global food supply by 2023.⁶²

ACTION 6: Mandatory declaration of added or free sugars (Food Labelling)

The sixth priority action is to adjust existing regulations on food labelling (e.g. food information to consumers regulation EU No 1169/2011⁵³, added sugars annex⁵⁰) to make the declaration of added or free sugars on prepacked foods mandatory. Currently, the Regulation No 1169/2011 does not allow for declaration of added sugars in the nutrition declaration. In the United States (US) a regulation is in place that requires the declaration of added sugars on labels.⁶³

ACTION 7: Mandatory reformulation targets for foods and meals at quick service restaurants (Food Composition)

With the seventh priority action, experts recommend the EU to set mandatory, ambitious and comprehensive reformulation targets for added sugars, salt, and saturated fat for processed and ultra-processed foods and meals sold at quick service restaurants (including snack food outlets) in EU Member States. Currently, the EU has not made a distinction in their policy documents between nutrients of concern in industrially processed foods and meals sold at quick service restaurants.^{56,57,64,65} The EU Framework for National Salt Initiatives and the Framework for National Initiatives on selected nutrients, with the Annexes on Saturated Fat and Added Sugars only set voluntary targets/goals to establish a benchmark for overall reduction of the nutrients of concern.

ACTION 8: Restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children (Food Promotion)

Prioritised eight, is the recommended action to introduce a new Directive, (amending the Audiovisual Media Services Directive (AVMSD 2010/13/EU⁵⁵)), which requires Member States to implement (1) minimum and time-based restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old in all digital (including broadcast, online and social) media and (2) bans on food packages for marketing foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old. The current AVMSD⁵⁵ only encourages Member States to establish self- or co-regulation schemes to reduce the exposure of children to marketing and does not include marketing on packages. The new

recommended Directive will lead to a reduction in the exposure of children (including adolescents) to marketing of foods high in saturated fat, trans fat, salt or added sugars and will protect children from the harmful impact of food marketing on food consumption and body weight⁶⁶. In the Farm to Fork strategy, it is stated that the Commission will seek commitments from food companies and organisations to take concrete actions on adapting marketing and advertising strategies taking into account the needs of the most vulnerable and that the Commission will develop an EU code and monitoring framework for responsible business and marketing conduct in the food supply chain (Q2 2021).¹⁴ However, this appears to be a voluntary self-regulatory approach for food companies and organisations. The Food-EPI expert panel recommends the Commission to introduce a (mandatory) directive that requires Member States to restrict or ban food companies and organisations marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents in EU Member States.

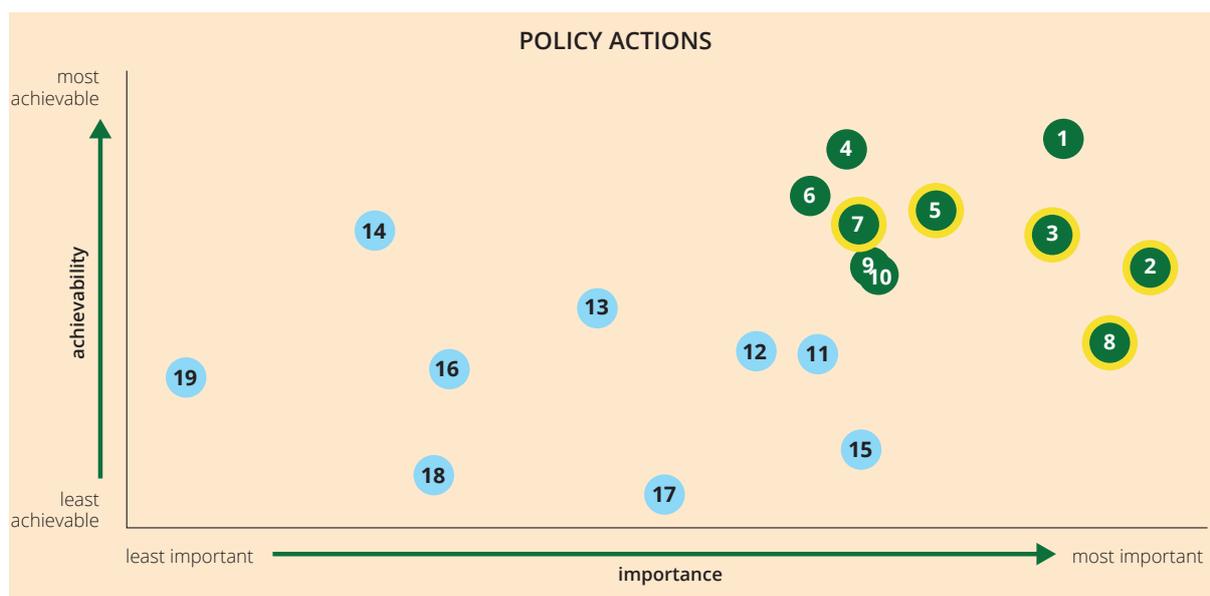
ACTION 9: Ensure that the Digital Services Act creates a governance regime that enables national legislation to minimise marketing of foods high in saturated fat, trans fat, salt or added sugars to children (Food Promotion)

The ninth priority action in the list, which -like action 8- also concerns restricting food marketing to children, is to ensure that the new Digital Services Act creates a governance regime that enables Member States to maintain, adopt and enforce national legislation to minimise the exposure of children and adolescents up to 19 years old to foods high in saturated fat, trans fat, salt or added sugars. Currently, in the AVMSD⁵⁵, the laws of the country where the broadcaster is established apply to the broadcast, rather than the laws of the country where the broadcast is received. So if the country of origin has lower levels of protection the broadcaster only needs to abide by those. This action proposed by the experts would enable Member States to maintain and enforce stringent food marketing restrictions. This is in line with the WHO recommendations on the marketing of foods and non-alcoholic beverages, which recommends EU Member States to reflect on how better cooperation and EU harmonisation could avoid weakening national marketing restrictions of foods high in saturated fat, trans fat, sugars or salt.⁶⁶

ACTION 10: Nutrient profiling system to restrict marketing of foods high in saturated fat, trans fat, salt or added sugars to children (Food Promotion)

The final top 10 priority policy action is – in line with action 8 and 9 – also related to restricting food marketing to children. This action recommends the EU to develop and use a clear and evidence-based nutrient profiling system (e.g. such as the WHO Europe nutrient profile model⁶⁷) to restrict the (online) marketing of processed and ultra-processed foods high in saturated fat, trans fat, salt or added sugars. So far, Member States have not always adopted effective food categorization systems to determine what foods should not be marketed to children.⁶⁶ In the Farm to Fork Strategy, setting nutrient profiles is also included as an action, but only for using nutrient and health claims.¹⁴ The EU Food-EPI expert panel recommends to extend the use of nutrient profiling for setting (online) food marketing restrictions.

Figure 8 Importance, achievability and potential to reduce socioeconomic inequalities in diet of recommended policy actions for the EU.*



* Top 10 priority policy actions in green; the five 'green' actions with 'yellow' shadow have the greatest potential to reduce socioeconomic inequalities in diet (i.e. pro-equity); see Table 2 for descriptions of the 19 actions.

4.2 Priority policy actions which are also pro-equity

The five actions that ranked highest on equity and were also included in the top 10 priority policy actions on a combination of importance and achievability are shown (in green) in Table 3. In Figure 8, these five pro-equity actions are marked with a yellow shadow.

Experts indicated that food composition actions, such as setting food composition and reformulation targets for processed and ultra-processed foods and adopting a legislated ban on trans fats have the greatest potential to be pro-equity and thus reduce socioeconomic inequalities in diet. In addition, food pricing actions were also supposed to lead to a reduction in socioeconomic inequalities in diet, such as allowing Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables. Furthermore, experts indicated that restricting or banning the marketing of foods high in added sugars, saturated fat, trans fat and salt, to children and adolescents up to 19 years old in all digital media, could lead to a reduction in socioeconomic inequalities in diet.

Table 3 The five policy actions that ranked highest on equity and are also included in the top 10 priority policy actions on a combination of importance and achievability*

Nr.	Domain	Label	Action
1 (3)	FOOD COMPOSITION	COMP1	Set mandatory, ambitious, comprehensive and time-specific food composition targets for added sugars, salt, and saturated fat for all food categories (including processed and ultra-processed foods) sold in EU Member States (e.g. saturated fat reduction for savoury snacks of a minimum of 5% in 4 years and a minimum of an additional 5% reduction by 2026 against the individual baseline levels at the end of 2020).
2 (5)	FOOD COMPOSITION	COMP1	Adopt a legislated ban on trans fats (i.e. no trans-fats are allowed instead of the maximum limit of 2 grams per 100 grams of fat) in processed and ultra-processed foods sold in EU Member States.
3 (2)	FOOD PRICES	PRICES1	Allow Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables, by adopting the proposal of the Commission ⁵² and encourage Member States to implement this VAT exemption to encourage healthy food choices.
4 (7)	FOOD COMPOSITION	COMP2	Set mandatory, ambitious and comprehensive reformulation targets for added sugars, salt, and saturated fat for processed and ultra-processed foods and meals sold at quick service restaurants (including snack food outlets) in EU Member States.
6 (8)	FOOD PROMOTION	PROMO	Introduce a new Directive, (amending the Audiovisual Media Services Directive (2010/13/EU ⁵⁵)), which requires Member States to implement (1) minimum and time-based restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old in all digital (including broadcast, online and social) media and (2) bans on food packages for marketing foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old.

* The number in brackets represent the ranking on a combination of importance and achievability as outlined in Table 2. These five actions are recommended to the EU to take immediate action on.

4.3 Recommended and priority infrastructure support actions

The 18 infrastructure support actions recommended by the Food-EPI expert panel are detailed in Table 4. Experts have ranked these actions twice, on importance and achievability. To identify the actions with the highest priority, we have listed the actions in order of ranking on a *combination* of importance and achievability in Table 4. The top 10 priority infrastructure support actions are shown in green. These are the EU-level infrastructure support actions perceived to be the most important and achievable to create healthy food environments in the EU. Each action is also plotted on importance and achievability in Figure 9, and the top 10 priority infrastructure support actions are shown in green.

Table 4 EU-level infrastructure support actions to create healthy food environments in the EU, recommended by the Food-EPI expert panel (listed in order of ranking on a combination of importance and achievability).*

	Domain	Action
1	LEADERSHIP	Develop a high-level EU Non-Communicable Diseases (NCDs) Prevention Strategy.
2	MONITORING AND INTELLIGENCE	Benchmark food environment policies regarding food reformulation, food labelling (incl. claims and front-of-pack labelling), food marketing, food prices, food provision in public spaces and retail (zoning laws and policies, in-store product placement), and support and coordinate the exchange of good practices between Member States (e.g. via the Open Method of Coordination).
3	LEADERSHIP	Include clear priorities to reduce inequalities or protect vulnerable populations in the multi-annual work programmes/annual State of the Union, (e.g. by the year X we want to have reduced health inequalities in relation to diet within/between EU Member States).
4	LEADERSHIP	Harmonise the promotion of healthy diets with other issues of concern such as climate change and environmental protection (e.g. showing leadership via the forthcoming 8th Environmental Action Programme and engaging with the European Environmental Agency, with its theme 'environment and health.').
5	MONITORING AND INTELLIGENCE	Recommend and support Member States to set up a monitoring system to assess the status of food environments, and to measure progress on achieving the goals of nutrition and health plans.
6	LEADERSHIP	Develop and adopt clear and specific population intake targets for specific nutrients (salt, added sugars, saturated fat) and specific foods (fruit and vegetables) at EU level aligned with the WHO targets and guidelines.
7	LEADERSHIP	Make diet-related health outcomes key political criteria in the European Semester and Health strand of the European Social Fund Plus (ESF+) Programme ^{68,2}
8	GOVERNANCE	Develop and adopt a procedure that ensures a good balance of scientific evidence from several disciplines (e.g. economics, psychology, health sciences, law and consumer sciences) is used in the development of food and nutrition policies (e.g. secure representation from various disciplines in committees/policy boards responsible for the development of food and nutrition policies).
9	MONITORING AND INTELLIGENCE	Evaluate food environment actions in the Member States (e.g. the recent trans-fat targets/limits in foods) by: (1) setting up an EU coordinated evaluation study of food environment policy actions in Member States or (2) providing funding to Member States to collect data to support this evaluation.
10	FUNDING AND RESOURCES	Establish an EU health promotion agency to support the design, implementation, monitoring and evaluation of actions on food environments, population nutrition and diet-related NCDs and their inequalities, e.g. such as the European Environment Agency (EEA).

2 ESF+ resources will be allocated to key political priorities and citizens' concerns: ESF+ programmes and projects will have to concentrate on related challenges identified under the European Semester

11	FUNDING AND RESOURCES	Increase EU funded research targeting issues related to the food environment (including attention for research targeting disadvantaged groups and underrepresented household types, that are at a higher risk of NCDs and food insecurity).
12	FUNDING AND RESOURCES	Reallocate more CAP resources to diet-related actions targeted at consumers like the EU School Fruit and Vegetable Scheme.
13	GOVERNANCE	Adopt the proposal ⁶⁹ to make the EU transparency register mandatory for lobbyists covering the Commission, Council and Parliament (including details of specific lobbying activities, e.g. when, who, what).
14	FUNDING AND RESOURCES	Include a heading on public health promotion in the Multiannual Financial Framework.
15	HEALTH-IN-ALL-POLICIES	Develop and adopt a health-in-all policies approach within the EU policy process and make it legally binding (by integrating health into all major EU spending programmes and setting an ambitious goal for health mainstreaming across all EU programmes, e.g. with a target of 25% of EU expenditure contributing to health objectives, as has been done with climate mainstreaming ⁷⁰).
16	HEALTH-IN-ALL-POLICIES	Establish a 'Health in All Policies' online portal containing at least: (1) a tracking tool providing an overview of all ongoing EU-level policy initiatives with potential impacts on health and well-being, in particular NCDs, and (2) an online directory where all impact assessments conducted for the policy initiatives identified in the first point are gathered and published.
17	HEALTH-IN-ALL-POLICIES	Make health impact assessments mandatory for all policies.
18	HEALTH-IN-ALL-POLICIES	Include diet-related health indicators when analysing health/health systems as part of the EU economic governance (the European Semester) and include health (equity) impact assessments as part of the governance-related Country Specific Recommendations of the Semester. E.g. by including diet-related outcomes as one of the indicators of the Social Scoreboard ⁷¹ (which monitors Member States' performance in relation to the European Pillar of Social Rights), which feeds into the preparation of the Country Reports prepared in the context of the European Semester and in the dialogue with Member States throughout the year.

* The top 10 priority infrastructure support actions on a combination of importance and achievability are shown in green (top 10).

Top 10 priority infrastructure support actions

Five of the top 10 priority infrastructure support actions are in the *Leadership* domain. Experts also see an important role for the EU in monitoring food environments (policies) as three of the top 10 priority actions are in the *Monitoring and Intelligence* domain. The other two top 10 actions are in the *Governance* domain and in the *Funding and Resources* domain. These actions are described in more detail below.

ACTION 1: High-level EU Non-Communicable Diseases (NCDs) Prevention Strategy (Leadership)

Developing a high-level EU Non-Communicable Diseases (NCDs) Prevention Strategy was the highest prioritised action. In 2020, the EU published its Farm to Fork Strategy 'For a fair, healthy, and environmentally-friendly food-system'¹⁴, which is the first EU strategy which encompasses all stages of the food system (from production to consumption).⁷² The Food-EPI expert panel recommends the EU to also develop such a high-level EU Strategy for the prevention of Non-Communicable Diseases. This strategy can encompass actions and recommendations for primary, secondary, tertiary and quaternary NCDs prevention.⁷³

ACTION 2: Benchmark food environment policies (Monitoring and Intelligence)

The second highest prioritised action is to benchmark food environment policies (regarding food reformulation, food labelling, food marketing, food prices, and food provision in public spaces and retail) as well as to support and coordinate the exchange of good practices between Member States. This could be done for example by the Open Method of Coordination, an EU policy-making process, or regulatory instrument, which does not result in EU legislation but aims to spread best practice and achieve convergence towards EU goals in those policy areas which fall under the partial or full competence of Member States.⁷⁴ This action would lead to better insights into the policy implementation gaps in Member States and to an increased exchange of effective food environment policies between Member States. This could contribute to more and stronger policies to create healthy food environments in the EU.

ACTION 3: Prioritise to reduce inequalities or protect vulnerable populations (Leadership)

The third priority action recommends to use current EU policy coordination cycles and programmes/instruments to include diet-related health priorities. With action 3, it is recommended to include clear priorities to reduce inequalities or protect vulnerable populations in the multi-annual work programmes/annual State of the Union. The State of the Union takes stock of the achievements of the past year and presents the priorities for the year ahead.^{75,76} Also it sets out how the Commission will address the most pressing challenges the European Union faces and ideas for shaping the future of the EU. By means of the EU Farm to Fork Strategy the Commission already acknowledges the importance of reducing socioeconomic inequalities in health: *"The Commission will step up its coordination of a common European response to crises affecting food systems in order to ensure food security and safety, reinforce public health and mitigate their socio-economic impact in the EU."*¹⁴

ACTION 4: Harmonise the promotion of healthy diets with other EU issues of concern (Leadership)

Prioritised fourth, is the recommended action to harmonise the promotion of healthy diets with other issues of concern such as climate change and environmental protection. This could for example be done by showing leadership via the forthcoming 8th Environmental Action Programme and engaging with the European Environmental Agency, with its theme 'environment and health'. Also the EU Farm to Fork Strategy 'For a fair, healthy, and environmentally-friendly food-system'¹⁴, can be strengthened by additional strong and visible political support to create healthy food environments, improve population nutrition, and reduce diet related NCDs and their related inequalities.

ACTION 5: Monitoring system to assess the status of food environments and measure progress (Monitoring and Intelligence)

The fifth priority action for the EU is to recommend and support Member States to set up a monitoring system to assess the status of food environments, and to measure progress on achieving the goals of their nutrition and health plans. This action would lead to more insight into what aspects of food environments in Member States need to be improved. The Farm to Fork Strategy states that the Commission will monitor the commitments from food companies and organisations to take concrete actions on health and sustainability.¹⁴ It is further mentioned that the Commission will monitor the transition to a sustainable food system and closely monitor food security.¹⁴ Yet, this does not incorporate monitoring of public health aspects of the food system transition/food environment which is specifically addressed with this action.

ACTION 6: Population intake targets (Leadership)

Currently, there are no clear population intake targets established at EU level. Prioritised sixth is the recommended action to develop and adopt clear and specific EU population intake targets for specific nutrients (salt, added sugars, saturated fat) and specific foods (fruit and vegetables) aligned with the WHO targets and guidelines.⁷⁷ Currently, EFSA publishes intake recommendations in Scientific Opinions and JRC collates intake recommendations from authoritative public health

bodies in the Health Promotion and Knowledge Gateway.⁷⁸ Setting clear targets at EU level would give clearer guidance to Member States on what is needed to achieve public health benefits such as reducing overweight, obesity and NCDs. In addition, these targets can serve as important starting points for developing, implementing and monitoring strategies for reducing nutrients of concern and increasing the intake of specific foods at EU level.

ACTION 7: Make diet-related health outcomes key political criteria in the European Semester and Health strand of the European Social Fund Plus (ESF+) Programme (Leadership)

Like action 3, experts recommend with this action to use current EU policy coordination cycles and programmes/instruments to include diet-related health priorities. This action, which was prioritised seventh, is the recommendation to make diet-related health outcomes key political criteria in the European Semester and Health strand of the European Social Fund Plus (ESF+) Programme.⁶⁸ The European Semester is an annual coordination cycle of economic and financial policies in the EU and the ESF+ is the main investment fund for investing in Health in 2021-2027. By prioritising diet-related health outcomes in such programmes, budget should specifically be allocated to public health promotion and NCD prevention (targeting the most vulnerable populations).

ACTION 8: Develop and adopt a procedure to balance scientific evidence from several disciplines in the development of policies (Governance)

Although scientific evidence is used in the development of food and nutrition policies at EU level, the Food-EPI experts recommend the EU, with the eight priority action, to develop and adopt a procedure that ensures a good balance of scientific evidence from several disciplines (e.g. economics, psychology, health sciences, law and consumer sciences). This could be achieved by -for example- a secure representation of independent scientist from various disciplines in EU committees/policy boards responsible for the development of food and nutrition policies. This would contribute to a balanced and integrated policy approach to improve food environments in EU Member States. The importance of an integrated policy approach was also highlighted by another recommended action in this study to develop and adopt an health-in-all policies approach (Action 15, Table 4). In the Farm to Fork Strategy it is mentioned that the EU will integrate policy coherence for sustainable development in all its policies.¹⁴ However, this focuses on sustainability aspects while public health is not explicitly mentioned in this context.

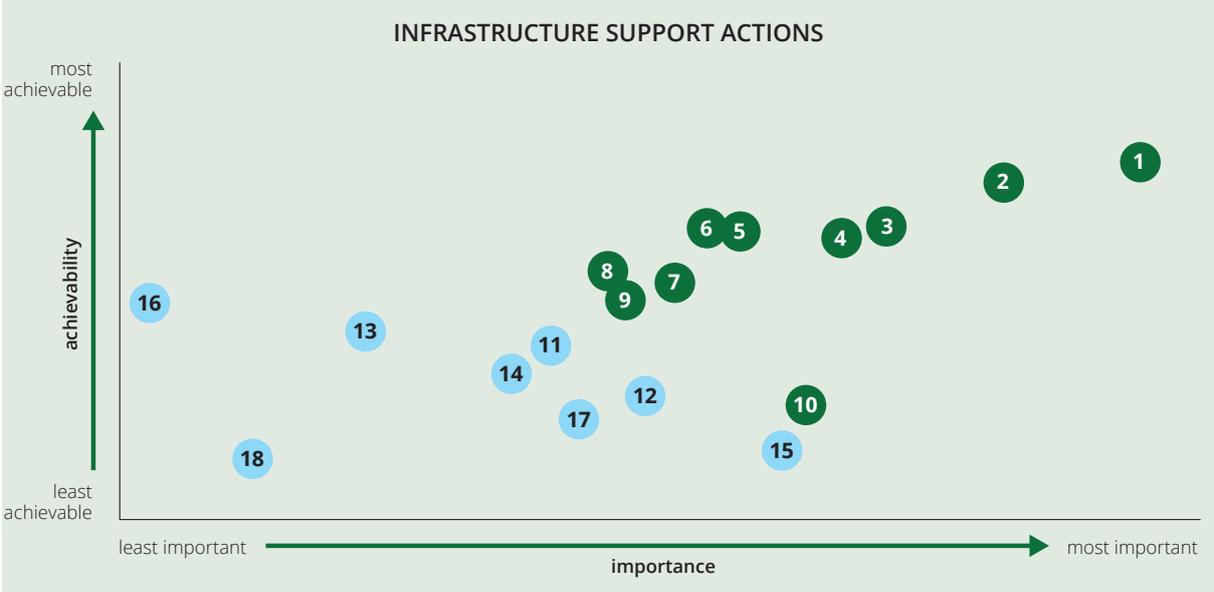
ACTION 9: Evaluation of food environment actions in Member States (Monitoring and Intelligence)

Prioritised ninth, the EU is recommended to evaluate food environment actions in the Member States by 1) setting up an EU coordinated evaluation study of food environment policy actions in Member States or (2) providing funding to Member States to collect data to support this evaluation. While Action 5 will lead to information on the status of food environments in Member States (e.g. what is the average sugar content of sweetened beverages?), this action will lead to insight into *the effects* of food environment policy actions on the food environment (e.g. does a sugar tax lead to reformulated products and a reduced sugar consumption?). Additionally this could lead to an exchange of best practices and improved policies influencing food environments within the EU and with that support creating healthy food environments in the EU.

ACTION 10: EU Health Promotion Agency (Funding and Resources)

The final top 10 prioritised action is the establishment of an EU health promotion agency, such as the European Environment Agency (EEA). Currently, at EU level there is a Steering Group on Health Promotion, Disease Prevention and Management of Non-Communicable Diseases. However, experts indicated that stronger EU action is needed to support the design, implementation, monitoring and evaluation of actions on improving food environments and population nutrition, and on the prevention of diet-related NCDs and related health inequalities.

Figure 9 Importance and achievability of recommended infrastructure support actions for the EU*



* Top 10 priority infrastructure support actions in green; see Table 4 for descriptions of the 18 actions



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5 What are the key recommendations for EU-level policies influencing food environments?

Effective government policies and actions are essential to create healthy food environments to encourage healthy food consumption and to reduce high levels of obesity, diet-related NCDs, and their related inequalities. Overall, this Food-EPI study has shown that there is much potential for the EU to improve its policies influencing food environments. This study identified 19 policy and 18 infrastructure support actions that are recommended by the Food-EPI expert panel to implement. In addition, experts in this study ranked the policy actions on importance, achievability and equity and the infrastructure support actions on importance and achievability.

Based on our study, we recommend the EU to take immediate action on the five recommended policy actions which were prioritised highest on a combination of importance and achievability and are also most likely contributing to a reduction of socioeconomic inequalities in diet.

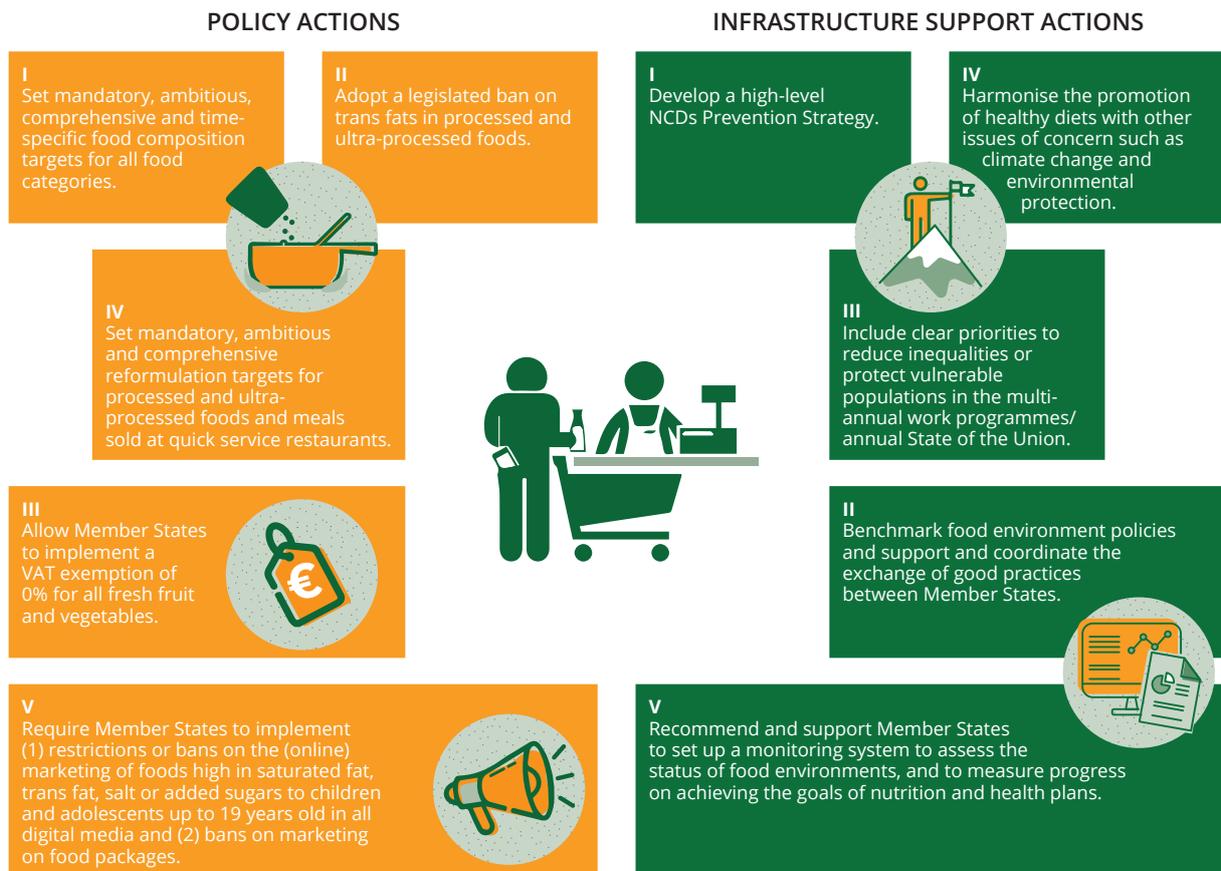
These five priority policy actions (also depicted in summary in Figure 10) are:

- I** Set mandatory, ambitious, comprehensive and time-specific food composition targets for added sugars, salt, and saturated fat for all food categories (including processed and ultra-processed foods) sold in EU Member States (e.g. saturated fat reduction for savoury snacks of a minimum of 5% in 4 years and a minimum of an additional 5% reduction by 2026 against the individual baseline levels at the end of 2020).
- II** Adopt a legislated ban on trans fats (i.e. no trans-fats are allowed instead of the maximum limit of 2 grams per 100 grams of fat) in processed and ultra-processed foods sold in EU Member States.
- III** Allow Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables, by adopting the proposal of the Commission⁵² and encourage Member States to implement this VAT exemption to encourage healthy food choices.
- IV** Set mandatory, ambitious and comprehensive reformulation targets for added sugars, salt, and saturated fat for processed and ultra-processed foods and meals sold at quick service restaurants (including snack food outlets) in EU Member States.
- V** Introduce a new Directive, (amending the Audiovisual Media Services Directive (2010/13/EU⁵⁵)), which requires Member States to implement (1) minimum and time-based restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old in all digital (including broadcast, online and social) media and (2) bans on food packages for marketing foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old.

Based on this study, we also recommend the EU to take immediate action on the five recommended infrastructure support actions which were prioritised highest on a combination of importance and achievability. These five priority infrastructure support actions (also depicted in summary in Figure 10) are:

- I Develop a high-level EU Non-Communicable Diseases (NCDs) Prevention Strategy.
- II Benchmark food environment policies regarding food reformulation, food labelling (incl. claims and front-of-pack labelling), food marketing, food prices, food provision in public spaces and retail (zoning laws and policies, in-store product placement), and support and coordinate the exchange of good practices between Member States (e.g. via the Open Method of Coordination).
- III Include clear priorities to reduce inequalities or protect vulnerable populations in the multi-annual work programmes/annual State of the Union, (e.g. by the year X we want to have reduced health inequalities in relation to diet within/between EU Member States).
- IV Harmonise the promotion of healthy diets with other issues of concern such as climate change and environmental protection (e.g. showing leadership via the forthcoming 8th Environmental Action Programme and engaging with the European Environmental Agency, with its theme 'environment and health.')
- V Recommend and support Member States to set up a monitoring system to assess the status of food environments, and to measure progress on achieving the goals of nutrition and health plans.

Figure 10 Priority policy and infrastructure support actions to create healthy food environments in the EU



6 What are the next steps?

This study identified 10 priority actions which we recommend for immediate implementation. Yet, all 37 recommended actions based on the input of the expert panel (Chapter 4, Tables 2 and 4) are perceived important and achievable in time, with sufficient government commitment. It is important to ensure accountability and maintain forward momentum despite changes in government leadership and other dynamic contextual factors.

It is recommended to conduct the Food-EPI study every four to five years. Follow-up studies will be key to demonstrating the development and strength of food environment policies occurring in the EU. This can be used to measure the improvement of EU-level policies targeting the food environment in EU Member States.

In the long-term, this EU Food-EPI research will contribute to a global database for monitoring and evaluating policies directed at improving the food environment and continuing obesity and NCD prevention commitments. As multiple countries complete the Food-EPI process, there will be continued expansion of the inventory of effective, innovative and sustainable policy and infrastructure support actions, which the EU may adopt. Beyond this EU exercise, the Food-EPI study is also conducted in Ireland, Norway, the Netherlands, Poland, and Germany as part of the Policy Evaluation Network (results of all outcomes will be published on: <https://www.jpi-pen.eu/reports.html>) and will be conducted in Slovenia, Spain, Portugal, Estonia, and Finland participating in the STOP (Science and Technology in childhood Obesity Policy) project (<https://www.stopchildobesity.eu/>). By repeatedly monitoring progress in both the EU and Member States, we can establish a roadmap for a healthier food environment in the EU.



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Appendix 1:

Policy Evaluation Network, Work Package 1.1

PEN is a network of researchers from 28 institutes in 7 European countries (France, Germany, Ireland, Italy, the Netherlands, Norway, Poland) and New Zealand, which aims to combine the expertise of all partners when interacting with policy makers and renowned experts in policy development, implementation and evaluation.

The EU Food-EPI study is conducted under the PEN Work Package 1, Objective 1.1 “To use the Food-EPI, to assess the extent of implementation of government (and EU) policies on food environments (against best practice) in participating PEN countries (Ireland, Norway, Netherlands, Poland, Germany)”. Under the umbrella of INFORMAS, this deliverable of PEN will be complemented by a concurrent project entitled STOP (Science and Technology in childhood Obesity Policy) through which an additional five countries (Slovenia, Spain, Portugal, Estonia, Finland) plan to complete the Food EPI by 2024.

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Appendix 2: Expert panel

The experts that contributed to the assessment of EU food environment policies and prioritisation, and their respective affiliations, are listed below. The experts took part on their own behalf and were not necessarily representing the organisations to which they belong. The final preparation of this report and the contents here within are solely the responsibility of the authors, and experts have not explicitly endorsed the contents of this report.

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Appendix 3: Definition of terms³

Benchmarks	Benchmarks or ‘best practice exemplars’ are the tools through which health promoting environments are created and assessed. They are comprehensive examples of policy implementation worldwide and are chosen based on their strength (e.g. external validated measures such as using independent nutrient profiling criteria) and comprehensiveness (e.g. including a broad range of age groups, food groups, physical activity measures, media, settings or regions) and evaluation of the impact of public and private sector policies on food environments is needed to strengthen accountability systems to reduce NCDs. The International Network for Food and Obesity/NCDs Research, Monitoring and Action Support (INFORMAS).
Domain	Components of the political system and/or settings organized around substantive issues. Policy domains differ depending the target health goal/behaviour i.e. food or physical activity. Policy domains include settings e.g. health, agricultural, industrial, trade, transport, education, urban planning, economic, research & innovation and environment. Within policy domains, the context needs to be considered such as geographical, epidemiological, socio-cultural, socio-economic, ethical, legal, organisation and funding.
Food	Refers to food and non-alcoholic beverages. In the context of Food-EPI, it excludes breastmilk or breastmilk substitutes.
Food Environment	The collective physical, economic, policy and socio-cultural surrounding, opportunities and conditions that influence people’s lifestyle choices and behaviours for the prevention of NCDs.
Food Insecurity	Food insecurity: Food insecurity is the inability of individuals and households to obtain an adequate and nutritious diet, often because they cannot afford healthy food or there is a lack of shops in their area that are easy to reach. Synonymous with food poverty.
Government	Any government department and, where appropriate, other agencies (i.e. statutory bodies such as offices, commissions, authorities, boards, councils etc.)
Policy Intervention	Policy interventions are defined as actual options selected by policymakers. Public policy interventions are specific interventions put into place by any level of government or associated agencies to achieve the public health objective. They may be written into broad strategies, action plans, official guidelines/notifications, calls to action, legislation, or rules and regulations. A policy Intervention may have its own exclusive policy document or may be part of a larger document.

³ Definitions based on the Policy Evaluation Network (PEN) Glossary, available from the PEN website: <https://www.jpi-pen.eu/>

Health inequality/ Socio-economic inequality	The avoidable, unfair, or remediable differences among groups of people, whether those groups are defined socially, economically, demographically or geographically or by other means of stratification. Health equity is the absence of the above(6).
Healthy/ unhealthy foods	Categorisation of foods as healthy/unhealthy are in accordance with the WHO and EU guidelines. The WHO defines a healthy diet as “protection against malnutrition in all its forms, as well as noncommunicable diseases (NCDs), such as diabetes, heart disease, stroke and cancer”(7). Where it is not clear which category to use, categorisation of foods should be informed by rigorous criteria or the use of a nutrient profiling model.
NCDs	Noncommunicable diseases (NCDs), also known as chronic diseases, tend to be of long duration and are the result of a combination of genetic, physiological, environmental and behaviours factors.
Nutrients of concern Nutrient Profiling Model	salt (sodium), saturated fat, trans fat, added sugar. Nutrient profiling is a tool used to categorize foods and non-alcoholic beverages according to those that are more likely to be part of a healthy diet from those that are less likely. This is often based on foods which contribute to excess consumption of energy, saturated fats, trans fats, sugar or salt.
Policy	Policies are purposeful decisions, plans and actions made by voluntary or authoritative actors in a system designed to create system-level change to directly or indirectly achieve specific societal goals. Within this definition, public policy is a form of government action usually expressed in a law, a regulation, or an order. Since it reflects an intent of government or its representative entities.
Public policy implementation	Refers to the transformation of government decisions through processes including different levels of government, administrative structures and capacities, inner administrative dynamics, party interest, and underlying normative and power structures.

Appendix 4: Food-EPI Domains and Indicators

Food-EPI Policy Domains	
Food-EPI Domain	Food-EPI Indicators
<p>DOMAIN 1 – FOOD COMPOSITION Food composition targets/standards/restrictions for processed foods: This domain concerns the extent to which the EU stimulated/proposed/developed/implemented systems to ensure that, where practicable, processed foods minimise the energy density and the nutrients of concern (salt, saturated fat, trans fat, added sugar).</p>	<p>COMP1 Food composition targets/standards/restrictions have been established by the EU for the content of the nutrients of concern (trans fats, added sugars, salt, saturated fat) in industrially processed foods, in particular for those food groups that are major contributors to population intakes of those nutrients of concern.</p>
	<p>COMP2 Food composition targets/standards/restrictions have been established by the EU for the content of the nutrients of concern (trans fats, added sugars, salt, saturated fat) in meals sold from food service outlets, in particular for those food groups that are major contributors to population intakes of those nutrients of concern.</p>
<p>DOMAIN 2 – FOOD LABELLING This domain concerns the extent to which the EU proposed/developed a regulatory system for consumer-oriented labelling on food packaging and menu boards in restaurants to enable consumers to easily make informed food choices and to prevent misleading claims.</p>	<p>LABEL1 Ingredient lists and nutrient declarations in line with Codex recommendations are present on the labels of all packaged foods.</p>
	<p>LABEL2 Evidence-based regulations are in place for approving and/or reviewing claims on foods, so that consumers are protected against unsubstantiated and misleading nutrition and health claims.</p>
	<p>LABEL3 One or more interpretive, evidence-informed front-of-pack supplementary nutrition information system(s) proposed/required by the EU, which readily allow consumers to assess a product's healthiness, is/are applied to all packaged foods (examples are the Nutri-Score and traffic lights).</p>
	<p>LABEL4 A simple and clearly-visible system of labelling the menu boards of all quick service restaurants (i.e. fast food chains) is set/proposed by the EU to be implemented by the Member States, which allows consumers to interpret the nutrient quality and energy content of foods and meals on sale.</p>

<p>DOMAIN 3 – FOOD PROMOTION</p> <p>This domain concerns the extent to which the EU has set/proposed policies to reduce the impact (exposure and power) of promotion of unhealthy foods to children including adolescents across all media.</p> <p>Exposure of food marketing concerns the reach and frequency of a marketing message. This is dependent upon the media or channels, which are used to market foods.</p> <p>The power of food marketing concerns the creative content of the marketing message. For example, using cartoons or celebrities enhances the power (or persuasiveness) of a marketing message because such strategies are attractive to children.</p>	<p>PROMO1 Effective policies are set/proposed by the EU to be implemented by the Member States to restrict exposure and power of promotion of unhealthy foods to children including adolescents through broadcast media (TV, radio).</p> <p>PROMO2 Effective policies are set/proposed by the EU to be implemented by the Member States to restrict exposure and power of promotion of unhealthy foods to children including adolescents through online and social media.</p> <p>PROMO3 Effective policies are set/proposed by the EU to be implemented by the Member States to restrict exposure and power of promotion of unhealthy foods to children including adolescents through non-broadcast media other than packaging and online/social media.</p> <p>PROMO4 Effective policies are set/proposed by the EU to be implemented by the Member States to ensure that unhealthy foods are not commercially promoted to children including adolescents in settings where children gather (e.g. preschools, schools, sport and cultural events).</p> <p>PROMO5 Effective policies are set/proposed by the EU to be implemented by the Member States to ensure that unhealthy foods are not commercially promoted to children (including adolescents) on food packages.</p>
<p>DOMAIN 4 – FOOD PRICES This domain concerns the extent to which food pricing policies (e.g., taxes and subsidies) are aligned with health outcomes by helping to make the healthy eating choices the easier, cheaper choices.</p>	<p>PRICES1 Taxes or levies on healthy foods are minimised to encourage healthy food choices (e.g. low or no sales tax, excise, value-added or import duties on fruit and vegetables).</p> <p>PRICES2 Taxes or levies on unhealthy foods (e.g. sugar-sweetened beverages, foods high in nutrients of concern) are in place and increase the retail prices of these foods by at least 10% to discourage unhealthy food choices, and these taxes are reinvested to improve population health.</p> <p>PRICES3 The intent of existing subsidies on foods, including infrastructure funding support (e.g. research and development, supporting markets or transport systems), is to favour healthy rather than unhealthy foods.</p> <p>PRICES4 The EU ensures that food-related income support programs are for healthy foods within EU countries.</p>

<p>DOMAIN 5 – FOOD PROVISION</p> <p>This domain concerns the extent to which the EU ensures that there are healthy food service policies to be implemented by Member States in government-funded settings to ensure that food provision encourages healthy food choices, and the extent to which the EU actively encourages and supports private companies to implement similar</p>	<p>PROV1 The EU ensures that there are clear, consistent policies (including nutrition standards) to be implemented by Member States in schools and early childhood education services for food service activities (canteens, food at events, fundraising, promotions, vending machines etc.) to provide and promote healthy food choices.</p> <p>PROV2 The EU ensures that there are clear, consistent policies to be implemented by Member States in other public sector settings for food service activities (canteens, food at events, fundraising, promotions, vending machines, etc.) to provide and promote healthy food choices.</p> <p>PROV3 The EU ensures that there are clear, consistent public procurement standards to be implemented by Member States in public sector settings for food service activities to provide and promote healthy food choices.</p> <p>PROV4 The EU ensures that there are good support and training systems to be implemented by Member States to help schools and other public sector organisations and their caterers meet the healthy food service policies and guidelines.</p> <p>PROV5 The EU actively encourages and supports private companies to provide and promote healthy foods and meals in their workplaces.</p>
<p>DOMAIN 6 – FOOD RETAIL</p> <p>This domain concerns the extent to which the EU has the power to set/ propose policies and programs to be implemented by Member States to support the availability of healthy foods and limit the availability of unhealthy foods in communities (outlet density and locations) and in-store (product placement).</p>	<p>RETAIL1 Zoning laws and policies are proposed by the EU to be implemented by the Member States to place limits on the density or placement of quick serve restaurants or other outlets selling mainly unhealthy foods in communities and/or access to these outlets (e.g. opening hours).</p> <p>RETAIL2 Zoning laws and policies are proposed by the EU to be implemented by the Member States to encourage the availability of outlets selling fresh fruit and vegetables and/or access to these outlets (e.g. opening hours, frequency i.e. for markets).</p> <p>RETAIL3 The EU ensures existing support systems are in place to be implemented by the Member States to encourage food stores to promote the in-store availability of healthy foods and to limit the in-store availability of unhealthy foods.</p> <p>RETAIL4 The EU ensures existing support systems are in place to be implemented by the Member States to encourage the promotion and availability of healthy foods in food service outlets and to discourage the promotion and availability of unhealthy foods in food service outlets.</p>
<p>DOMAIN 7 – FOOD TRADE AND INVESTMENT</p> <p>This domain concerns the extent to which the EU ensures that trade and investment agreements protect food sovereignty, favour healthy food environments, are linked with domestic health and agricultural policies in ways that are consistent with health objectives, and do not promote unhealthy food environments.</p>	<p>TRADE1 The EU undertakes risk impact assessments before and during the negotiation of trade and investment agreements, to identify, evaluate and minimize the direct and indirect negative impacts of such agreements on population nutrition and health.</p> <p>TRADE2 The EU adopts measures to manage investment and protect their regulatory capacity with respect to public health nutrition.</p>

Food-EPI Infrastructure Support Domains

Food-EPI Domain	Food-EPI Indicators
<p>DOMAIN 8 – LEADERSHIP This domain concerns the extent to which political leadership ensures that there is strong support for the vision, planning, communication, implementation and evaluation of policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.</p>	<p>LEAD1 There is strong, visible, political support (at the head of European Commission/Parliament level) expressed at European, supra national as well as national level for improving food environments, population nutrition, diet related NCDs and their related inequalities”.</p>
	<p>LEAD2 Clear population intake targets have been proposed by the EU for the nutrients of concern and/or relevant food groups to meet WHO and European recommended dietary intake levels.</p>
	<p>LEAD3 Clear, interpretive, evidenced-informed food based dietary guidelines have been established and conveyed to EU countries.</p>
	<p>LEAD4 There is a comprehensive, transparent, up-to-date implementation plan linked to EU countries’ needs and priorities, to improve food environments, reduce the intake of the nutrients of concern to meet WHO and European recommended dietary intake levels, and reduce diet-related NCDs.</p>
	<p>LEAD5 EU priorities have been established to reduce inequalities or protect vulnerable populations in relation to diet, nutrition, obesity and NCDs</p>
<p>DOMAIN 9 – GOVERNANCE This domain concerns the extent to which the EU has structures in place to ensure transparency and accountability, and encourage broad community participation and inclusion when formulating and implementing policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.</p>	<p>GOVER1 There are procedures in place to restrict commercial influences on the development of policies related to food environments where they have conflicts of interest with improving population nutrition. for example: restricting lobbying influences.</p>
	<p>GOVER2 Policies and procedures are implemented for using evidence in the development of food and nutrition policies.</p>
	<p>GOVER3 Policies and procedures are implemented for ensuring transparency in the development of food and nutrition policies.</p>
	<p>GOVER4 The EU ensures public access to comprehensive nutrition information and key documents (e.g. budget documents, annual performance reviews and health indicators) for the public.</p>

<p>DOMAIN 10 – MONITORING AND INTELLIGENCE</p> <p>This domain concerns the extent to which the EU's monitoring and intelligence systems (surveillance, evaluation, research and reporting) are comprehensive and regular enough to assess the status of food environments, population nutrition and diet-related NCDs and their inequalities, and to measure progress on achieving the goals of nutrition and health plans.</p>	<p>MONIT1 Monitoring systems, implemented by the EU, are in place to regularly monitor food environments(especially for food composition for nutrients of concern, food promotion to children, and nutritional quality of food in schools and other public sector settings), against codes/guidelines/standards/targets.</p> <p>MONIT2 There is regular monitoring of adult and childhood nutrition status and population intakes against specified intake targets or recommended daily intake levels.</p> <p>MONIT3 There is regular monitoring of adult and childhood overweight and obesity prevalence using anthropometric measurements.</p> <p>MONIT4 There is regular monitoring of the prevalence of NCD metabolic risk factors and occurrence rates (e.g. prevalence, incidence, mortality) for the main diet-related NCDs.</p> <p>MONIT5 Major programs and policies are regularly evaluated to assess their effectiveness and contributions to achieving the goals of the nutrition and health plans.</p> <p>MONIT6 Progress towards reducing health inequalities or health impacts in vulnerable populations and social and economic determinants of health are regularly monitored.</p>
<p>DOMAIN 11 – FUNDING AND RESOURCES</p> <p>This domain concerns the extent to which the EU has sufficient funding invested in 'Population Nutrition Promotion' (estimated from the investments in population promotion of healthy eating and healthy food environments for the prevention of obesity and diet-related NCDs, excluding all one-on-one promotion (primary-care, antenatal services, maternal and child nursing services etc.), food safety, micronutrient deficiencies (e.g. folate fortification and undernutrition)) to create healthy food environments, improve population nutrition, and reduce obesity, diet-related NCDs and their related inequalities.</p>	<p>FUND1 The 'population nutrition' budget, as a proportion of total health spending and/or in relation to the diet-related NCD burden sufficiently contributes to reducing diet-related NCDs.</p> <p>FUND2 EU funded research is targeted for improving food environments, reducing obesity, NCDs and their related inequalities.</p> <p>FUND3 There is a statutory health promotion agency in place that includes an objective to improve population nutrition with a secure funding stream.</p>

<p>DOMAIN 12 – PLATFORMS FOR INTERACTION</p> <p>This domain concerns the extent to which there are coordination platforms and opportunities for synergies across EU departments, levels of government, and other sectors (NGOs, private sector, and academia) such that policies and actions in food and nutrition are coherent, efficient and effective in improving food environments, population nutrition, diet-related NCDs and their related inequalities.</p>	<p>PLAT1 There are robust coordination mechanisms across departments and levels of government (European, national, state and local) to ensure policy coherence, alignment, and integration of food, obesity and diet-related NCD prevention policies across governments.</p>
	<p>PLAT2 There are formal platforms (with clearly defined mandates, roles and structures) for regular interactions between the EU and the commercial food sector on the implementation of healthy food policies and other related strategies.</p>
	<p>PLAT3 There are formal platforms (with clearly defined mandates, roles and structures) for regular interactions between the EU and civil society on the development, implementation and evaluation of healthy food policies and other related strategies.</p>
	<p>PLAT4 The governments work with a system-based approach with (local, national and European) organisations/partners/groups to improve the healthiness of food environments in EU countries.</p>
<p>DOMAIN 13 – HEALTH IN ALL POLICIES</p> <p>This domain concerns the processes that are in place to ensure policy coherence and alignment, and that population health impacts are explicitly considered in the development of EU policies.</p>	<p>HIAP1 There are processes in place to ensure that population nutrition, health outcomes and reducing health inequalities or health impacts in vulnerable populations are considered and prioritised in the development of all EU policies relating to food.</p>
	<p>HIAP2 There are processes e.g. Health Impact Assessment's (HIAs) to assess and consider health impacts during the development of other non-food policies.</p>

Appendix 5:

EU Food-EPI Actions

POLICY DOMAINS

DOMAIN 1 – FOOD COMPOSITION – Food composition targets/standards/restrictions for processed foods: This domain concerns the extent to which the EU stimulated/proposed/developed/implemented systems to ensure that, where practicable, processed foods minimise the energy density and the nutrients of concern (salt, saturated fat, trans fat, added sugar).

ACTION 1: Set mandatory, ambitious, comprehensive and time-specific food composition targets for added sugars, salt, and saturated fat for all food categories (including processed and ultra-processed foods) sold in EU Member States (e.g. saturated fat reduction for savoury snacks of a minimum of 5% in 4 years and a minimum of an additional 5% reduction by 2026 against the individual baseline levels at the end of 2020).

ACTION 2: Adopt a legislated ban on trans fats (i.e. no trans-fats are allowed instead of the maximum limit of 2 grams per 100 grams of fat) in processed and ultra-processed foods sold in EU Member States.

ACTION 3: Set mandatory, ambitious and comprehensive reformulation targets for added sugars, salt, and saturated fat for processed and ultra-processed foods and meals sold at quick service restaurants (including snack food outlets) in EU Member States.

DOMAIN 2 – FOOD LABELLING – This domain concerns the extent to which the EU proposed/developed a regulatory system for consumer-oriented labelling on food packaging and menu boards in restaurants to enable consumers to easily make informed food choices and to prevent misleading claims.

ACTION 4: Adjust existing regulations (e.g. food information to consumers regulation EU No 1169/2011⁴, added sugars annex⁵) to make the declaration of added or free sugars on prepacked foods mandatory.

ACTION 5: Adjust existing regulations (e.g. food information to consumers regulation EU No 1169/2011⁶, regulation 2019/649 amending Annex III to Regulation (EC) No 1925/2006 as regards trans fat⁷) to make the declaration of trans fats on prepacked foods mandatory.

ACTION 6: Develop and adopt an EU harmonized easy-to-understand front-of-pack label (including a normative health statement) which is mandatory for Member States to implement for all product categories including the display on prepacked foods as well as on-shelf labelling for non-prepacked foods.

ACTION 7: Propose an EU easy-to-understand front-of-pack label (including a normative health statement) for Member States to implement for all product categories including the display on prepacked foods as well as on-shelf labelling for non-prepacked foods, while at the same time allowing Member States to customize FOP towards national dietary guidelines.

ACTION 8: Develop an EU harmonized clear visible system of labelling (including a normative health statement) for foods displayed on menu boards of all quick service restaurants, which is mandatory

4 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02011R1169-20180101&from=EN>

5 https://ec.europa.eu/health/sites/health/files/nutrition_physical_activity/docs/added_sugars_en.pdf

6 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02011R1169-20180101&from=EN>

7 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019R0649>

for Member States to implement (e.g. extend the mandatory allergen information provision in the Food Information to Consumers Regulation).

ACTION 9: Develop and use a clear and evidence-based nutrient profiling system to prevent the use of nutrition and health claims (including function claims) on foods and meals high in saturated fat, trans fat, salt or added sugars.

ACTION 10: Adjust the existing regulation (food information to consumers regulation EU No 1169/2011) to require companies to make the ingredient lists, nutrition declaration (per 100 g) and front-of-pack label (including a normative health statement) of prepacked food and meals sold at quick service restaurants (including snack food outlets) digitally available (e.g. on the company website, via a QR code).

DOMAIN 3 – FOOD PROMOTION – This domain concerns the extent to which the EU has set/proposed policies to reduce the impact (exposure and power) of promotion of unhealthy foods to children including adolescents across all media.

- **Exposure of food marketing concerns the reach and frequency of a marketing message. This is dependent upon the media or channels, which are used to market foods.**
- **The power of food marketing concerns the creative content of the marketing message. For example, using cartoons or celebrities enhances the power (or persuasiveness) of a marketing message because such strategies are attractive to children.**

ACTION 11: Introduce a new Directive, (amending the Audiovisual Media Services Directive (2010/13/EU⁸)), which requires Member States to implement (1) minimum and time-based restrictions or bans on the (online) marketing of foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old in all digital (including broadcast, online and social) media and (2) bans on food packages for marketing foods high in saturated fat, trans fat, salt or added sugars to children and adolescents up to 19 years old.

ACTION 12: Ensure that the Digital Services Act creates a governance regime that enables Member States to maintain, adopt and enforce national legislation to minimise the exposure of children and adolescents up to 19 years old to foods high in saturated fat, trans fat, salt or added sugars.

ACTION 13: Develop and use a clear and evidence-based nutrient profiling system (e.g. such as the WHO nutrient profile model) to restrict the marketing (including online marketing) of processed and ultra-processed foods high in saturated fat, trans fat, salt or added sugars.

ACTION 14: Prohibit the sponsorship of foods high in saturated fat, trans fat, salt or added sugars from EU-wide sporting and other events with a legal or financial connection with the EU (e.g. events organized by the Union of European Football Associations (UEFA)).

DOMAIN 4 – FOOD PRICES – This domain concerns the extent to which food pricing policies (e.g., taxes and subsidies) are aligned with health outcomes by helping to make the healthy eating choices the easier, cheaper choices.

ACTION 15: Allow Member States to implement a VAT exemption of 0% for all fresh fruit and vegetables, by adopting the proposal of the Commission⁹ and encourage Member States to implement this VAT exemption to encourage healthy food choices.

ACTION 16: Require Member States to implement the standard VAT rate of a minimum of 15% to foods high in trans fats, saturated fat, added sugars, by adding those foods to the list of goods and services (Annex IIIa of the current proposal on VAT rates¹⁰) to which the standard rate of minimum 15% must always be applied.

8 <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32010L0013>

9 https://ec.europa.eu/taxation_customs/sites/taxation/files/18012018_proposal_vat_rates_en.pdf

10 https://ec.europa.eu/taxation_customs/sites/taxation/files/18012018_annex_proposal_vat_rates_en.pdf

ACTION 17: Encourage Member States to implement the standard VAT rate of a minimum of 15% to foods high in trans fats, saturated fat, added sugars and develop a policy toolkit to support Member States implementing these VAT rates.

ACTION 18: Phase out Common Agricultural Policy (CAP) direct income support for farmers producing agricultural commodities unfavourable for a healthy diet (e.g. sugar beets and intensive livestock systems), and provide only CAP direct income support to farmers producing agricultural commodities in favour of a healthy diet (e.g. fruits and vegetables), while ensuring sustainable food production (see Farm to Fork Strategy).

ACTION 19: Encourage Member States to ensure that consumer food-related income support programs distribute mainly nutritious food products supporting a healthy diet (e.g. fruit and vegetables, dietary fibre), e.g. replacing the current provision about food support in the European Social Fund Plus from *“where appropriate the choice of food products to be distributed shall be made having considered their contribution to the balanced diet of the most deprived persons”* to *“ensure the choice of food products to be distributed is for nutritious food products supporting a healthy diet (e.g. fruit, vegetables, dietary fibre such as whole grains), and is not including foods high in trans fats, saturated fat, added sugars or salt, which contribute to a healthy diet of the most deprived persons”*.

DOMAIN 5 – FOOD PROVISION – This domain concerns the extent to which the EU ensures that there are healthy food service policies to be implemented by Member States in government-funded settings to ensure that food provision encourages healthy food choices, and the extent to which the EU actively encourages and supports private companies to implement similar.

ACTION 20: Develop and adopt nutrition and menu standards and public procurement standards to improve food environments in institutional catering of the EU (e.g. EU offices and official functions).

ACTION 21: Amend the Public Procurement Directive to include specific clauses that relate to the provision and promotion of nutritious foods supporting healthy diets in public sector settings and support the implementation by Member States via guidelines and toolkits.

ACTION 22: Include minimum mandatory criteria for food procurement supporting healthy diets in schools, hospitals and public institutions, in addition to setting these criteria for sustainable food procurement as announced in the Farm to Fork Strategy.

ACTION 23: Provide food service and procurement guidelines (e.g. “the European Sustainable and Healthy Public Food Procurement guide”) to support healthy diets which also promote the role of public health dietitians/nutritionists to support public sector organisations and their caterers (e.g. by training staff, supporting the implementation of nutrition standards).

ACTION 24: Establish an EU network of food procurement professionals of EU member states to exchange knowledge and good practices regarding food procurement to support healthy diets.

DOMAIN 6 – FOOD RETAIL – This domain concerns the extent to which the EU has the power to set/propose policies and programs to be implemented by Member States to support the availability of healthy foods and limit the availability of unhealthy foods in communities (outlet density and locations) and in-store (product placement).

ACTION 25: Include “criteria for a healthy food environment (e.g. outlet density and locations)” in the Strategic Environmental Assessments (via the SEA Directive 2001/42/EC and Protocol¹¹) required to be conducted for land use or spatial programs prepared or adopted by national, regional or local authorities.

11 <https://ec.europa.eu/environment/eia/sea-legalcontext.htm>

ACTION 26: Include “criteria for a healthy food environment (e.g. outlet density and locations)” in the Environmental Impact Assessment (EIA) (via the EIA Directive 2011/92/EU¹²) and require Member States to mandatory conduct an EIA for urban development projects.

ACTION 27: Elicit an EU-wide retail sector commitment to (1) remove ultra-processed and processed foods high in added sugars, salt, trans fat or saturated fat from near checkout counters and (2) ban (price) promotions of foods high in added sugars, salt, trans fat or saturated fat.

DOMAIN 7 – FOOD TRADE AND INVESTMENT – This domain concerns the extent to which the EU ensures that trade and investment agreements protect food sovereignty, favour healthy food environments, are linked with domestic health and agricultural policies in ways that are consistent with health objectives, and do not promote unhealthy food environments.

ACTION 28: Make health impact assessments mandatory for new trade agreements between the EU and third countries, including explicit references to the food environment and use this evidence and information when making decisions on trade policy.

ACTION 29: Continuously monitor the impact of trade agreements on the EU food environment, population nutrition and health (e.g. apply the European Precautionary Principle).

ACTION 30: Examine clauses (including Investor state dispute settlement (ISDS)) in trade agreements and adjust clauses if they violate with the protection of public health.

INFRASTRUCTURE DOMAINS

Overall Infrastructure Support Action

ACTION 1: Benchmark food environment policies regarding food reformulation, food labelling (incl. claims and front-of-pack labelling), food marketing, food prices, food provision in public spaces and retail (zoning laws and policies, in-store product placement), and support and coordinate the exchange of good practices between Member States (e.g. via the Open Method of Coordination).

DOMAIN 8 – LEADERSHIP – This domain concerns the extent to which political leadership ensures that there is strong support for the vision, planning, communication, implementation and evaluation of policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.

ACTION 2: Develop a high-level EU NCDs Prevention Strategy.

ACTION 3: Harmonise the promotion of healthy diets with other issues of concern such as climate change and environmental protection (e.g. showing leadership via the forthcoming 8th Environmental Action Programme and engaging with the European Environmental Agency, with its theme ‘environment and health.’)

ACTION 4: Leaders should prioritize public health nutrition concerns above other (e.g. economic) concerns, e.g. by eliciting a Summit/Council Conclusion where political leaders/Heads of State invite/call on the Commission to develop proposals/regulations to step on the fight against obesity, in which the Commission prioritises food and health concerns above other concerns and uses a human rights-based approach to food and health.

ACTION 5: Develop and adopt clear and specific population intake targets for specific nutrients (salt, added sugars, saturated fat) and specific foods (fruit and vegetables) at EU level aligned with the WHO targets and guidelines.

12 <https://ec.europa.eu/environment/eia/eia-legalcontext.htm>

ACTION 6: Make (multi)annual recommendations to EU Member States on how they could improve their food environments (e.g. via the European Semester) preferably based on the monitoring of national actions.

ACTION 7: Make diet-related health outcomes key political criteria in the European Semester and Health strand of the European Social Fund Plus (ESF+) Programme¹³.

ACTION 8: Include clear priorities to reduce inequalities or protect vulnerable populations in the multi-annual work programmes/annual State of the Union, (e.g. by the year X we want to have reduced health inequalities in relation to diet within/between EU Member States).

DOMAIN 9 – GOVERNANCE – This domain concerns the extent to which the EU has structures in place to ensure transparency and accountability, and encourage broad community participation and inclusion when formulating and implementing policies and actions to create healthy food environments, improve population nutrition, and reduce diet-related inequalities.

ACTION 9: Create broad and transparent procedures for policy formulation to regulate interests in the decision-making process and develop a mechanism to declare conflict of interest in policy making, including:

- Ban commercial sponsorships of and financial contributions to EU institutes, conferences, fora or meetings (e.g. the Presidency of the Council of the EU)
- Restrict lobbying influences in EU institutes, conferences, fora or meetings (e.g. protocols for the eligibility of engaging industry parties in the problem definition, formulation, adoption, implementation or evaluation of the policies)
- Ensure transparency regarding the use of evidence in policy design (e.g. by a mandatory full public disclosure of declaration of interests of all parties involved in the development of policies)
- Ensure transparency about the decision-making process of trade agreements
- Rules for engaging with experts (e.g. guidance for the eligibility of engaging experts in the problem definition, formulation, adoption, implementation or evaluation of the policies¹⁴)

ACTION 10: Develop and adopt a procedure so that generated knowledge (e.g. scientific papers, research by the EU) and good practices regarding food and nutrition (policies) are easy and always accessible (e.g. database for policy makers).

ACTION 11: Develop and adopt a procedure that ensures a good balance of scientific evidence from several disciplines (e.g. economics, psychology, health sciences, law and consumer sciences) is used in the development of food and nutrition policies (e.g. secure representation from various disciplines in committees/policy boards responsible for the development of food and nutrition policies).

ACTION 12: Adopt the proposal¹⁵ to make the EU transparency register mandatory for lobbyists covering the Commission, Council and Parliament (including details of specific lobbying activities, e.g. when, who, what).

ACTION 13: Encourage and support Member States with setting up a mandatory transparency register for lobbyists.

ACTION 14: Develop and adopt a procedure to ensure that simplifying the laws under the EU's better regulation agenda (REFIT) does not have any harmful impact on public health objectives.

13 <https://ec.europa.eu/esf/main.jsp?catId=62&langId=en#:~:text=The%20European%20Social%20Fund%20Plus,the%20existing%20European%20Social%20Fund.> ESF+ resources will be allocated to key political priorities and citizens' concerns: ESF+ programmes and projects will have to concentrate on related challenges identified under the European Semester

14 <https://ec.europa.eu/jrc/en/science-update/eu-wide-inventory-citizen-science-environmental-policy>

15 https://ec.europa.eu/commission/presscorner/detail/en/STATEMENT_19_1152

DOMAIN 10 – MONITORING AND INTELLIGENCE – This domain concerns the extent to which the EU’s monitoring and intelligence systems (surveillance, evaluation, research and reporting) are comprehensive and regular enough to assess the status of food environments, population nutrition and diet-related NCDs and their inequalities, and to measure progress on achieving the goals of nutrition and health plans.

ACTION 15: Recommend and support Member States to set up a monitoring system to assess the status of food environments, and to measure progress on achieving the goals of nutrition and health plans.

ACTION 16: Set up a feasibility study to identify an effective and viable monitoring system for food composition of ready-to-eat meals sold at quick service restaurants (including snack food outlets) in EU Member States.

ACTION 17: Expand the monitoring study on TV marketing of Chafea to include also other media (e.g. packaging, digital marketing).

ACTION 18: Support Member States with developing a database to monitor food prices in the EU and link it to consumption data.

ACTION 19: Complement the Farm Accountancy Data Network (FADN) in Farming (DG Agri) with a Food Consumption Data Network.

ACTION 20: Evaluate food environment actions in the Member States (e.g. the recent trans-fat targets/limits in foods) by: (1) setting up an EU coordinated evaluation study of food environment policy actions in Member States or (2) providing funding to Member States to collect data to support this evaluation.

DOMAIN 11 – FUNDING AND RESOURCES – This domain concerns the extent to which the EU has sufficient funding invested in ‘Population Nutrition Promotion’ (estimated from the investments in population promotion of healthy eating and healthy food environments for the prevention of obesity and diet-related NCDs, excluding all one-on-one promotion (primary-care, antenatal services, maternal and child nursing services etc.), food safety, micronutrient deficiencies (e.g. folate fortification and undernutrition) to create healthy food environments, improved population nutrition, reductions in obesity, diet-related NCDs and their related inequalities.

ACTION 21: Reallocate more CAP resources to diet-related actions targeted at consumers like the EU School Fruit and Vegetable Scheme.

ACTION 22: Increase the EU funding to Member States (i.e. through EFSA) to conduct national regular food consumption surveys.

ACTION 23: Include a heading on public health promotion in the Multiannual Financial Framework.

ACTION 24: Increase EU funded research targeting issues related to the food environment (including attention for research targeting disadvantaged groups and underrepresented household types, that are at a higher risk of NCDs and food insecurity).

ACTION 25: Establish an EU health promotion agency to support the design, implementation, monitoring and evaluation of actions on food environments, population nutrition and diet-related NCDs and their inequalities, e.g. such as the European Environment Agency (EEA).

DOMAIN 12 – PLATFORMS FOR INTERACTION – This domain concerns the extent to which there are coordination platforms and opportunities for synergies across EU departments, levels of government, and other sectors (NGOs, private sector, and academia) such that policies and actions in food and nutrition are coherent, efficient and effective in improving food environments, population nutrition, diet-related NCDs and their related inequalities.

ACTION 26: Increase the transparency of platforms (e.g. their actions, performance) such as the EU Pledge (e.g. have public consultations on draft proposal documents, ensure independent monitoring of commitments, make all communication between partners as well as the evidence base on which decisions were taken publicly available (e.g. public domain of webpages)).

ACTION 27: Establish an EU advisory body (e.g. official institution such as the Committee of the Regions¹⁶ or the Committee on World Food Security (CFS)¹⁷) on food and public health in which civil society organisations and public health professionals have a formal role in the policy process (e.g. are being asked for recommendations in policy development).

DOMAIN 13 – HEALTH IN ALL POLICIES – This domain concerns the processes that are in place to ensure policy coherence and alignment, and that population health impacts are explicitly considered in the development of EU policies.

ACTION 28: Develop and adopt a health-in-all policies approach within the EU policy process and make it legally binding (by integrating health into all major EU spending programmes and setting an ambitious goal for health mainstreaming across all EU programmes, e.g. with a target of 25% of EU expenditure contributing to health objectives, as has been done with climate mainstreaming¹⁸).

ACTION 29: Set up a policy coherency Unit for public health (such as the Policy Coherency Unit for Development (PCD)¹⁹) within the European Commission and/or the Parliament which scans the annual work programme for any possible inconsistencies.

ACTION 30: Make health impact assessments mandatory for all policies.

ACTION 31: Establish a ‘Health in All Policies’ online portal containing at least: (1) a tracking tool providing an overview of all ongoing EU-level policy initiatives with potential impacts on health and well-being, in particular NCDs, and (2) an online directory where all impact assessments conducted for the policy initiatives identified in the first point are gathered and published.

ACTION 32: Include diet-related health indicators when analysing health/health systems as part of the EU economic governance (the European Semester) and include health (equity) impact assessments as part of the governance-related Country Specific Recommendations of the Semester. E.g. by including diet-related outcomes as one of the indicators of the Social Scoreboard²⁰ (which monitors Member States’ performance in relation to the European Pillar of Social Rights), which feeds into the preparation of the Country Reports prepared in the context of the European Semester and in the dialogue with Member States throughout the year.

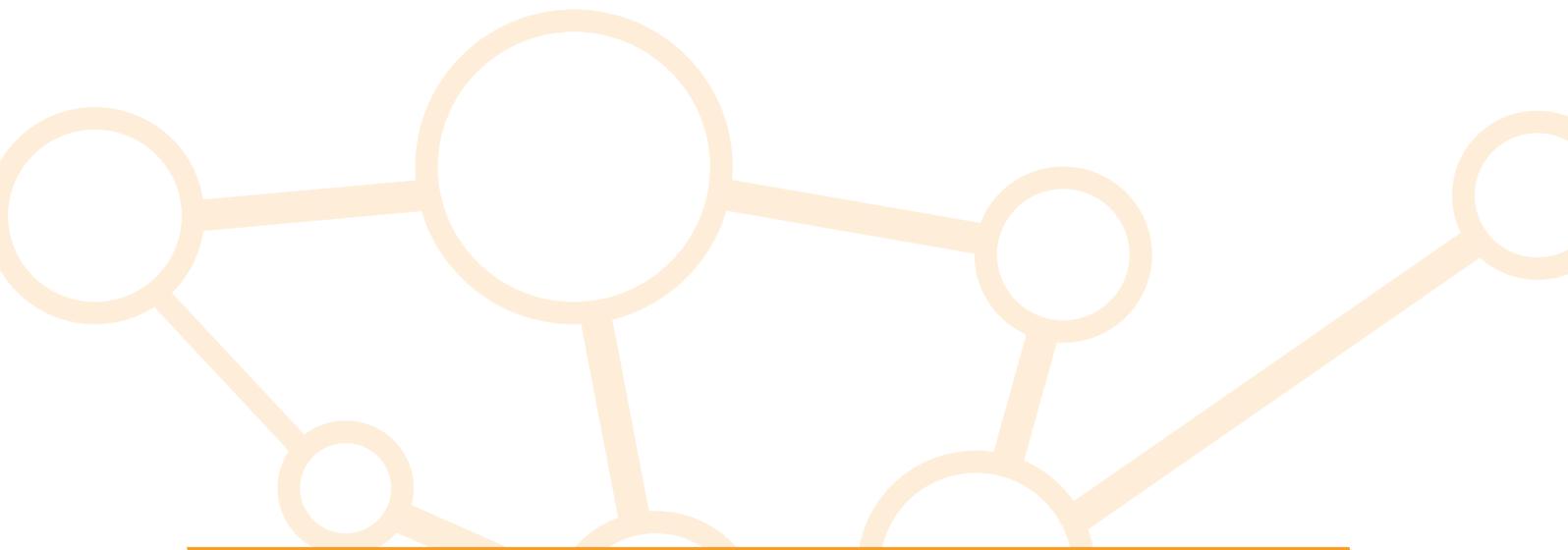
16 <https://cor.europa.eu/en/about/Pages/default.aspx>

17 <http://www.fao.org/cfs>

18 https://ec.europa.eu/clima/policies/budget/mainstreaming_en and https://ec.europa.eu/commission/sites/beta-political/files/communication-modern-budget-may_2018_en.pdf

19 https://ec.europa.eu/international-partnerships/policy-coherence-development_en

20 <https://ec.europa.eu/eurostat/web/european-pillar-of-social-rights/indicators/social-scoreboard-indicators> and <https://ec.europa.eu/social/main.jsp?langId=en&catId=1196&newsId=9163&furtherNews=yes> and https://ec.europa.eu/commission/sites/beta-political/files/social-scoreboard-2018-country-reports_en.pdf



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