



Best-ReMaP

Healthy Food for a Healthy Future

Milestone 4.1

**Summary report of the
analysis of the interviews with
EU experts on the integration and
sustainability of Best-ReMaP outcomes**

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Abbreviations

EU	European Union
DG	Directorate General (European Commission)
DG SANTE	Directorate General For Health and Food Safety
DG AGRI	Directorate General for Agriculture
DG RTD	Directorate General for Research & Innovation
DG CONNECT	Directorate General for Communications Networks, Content and Technology
DG ENVI	Directorate General for Environment
WHO	World Health Organization
GDPR	General Data Protection Regulation
NGO	Non-Governmental Organization
JRC	Joint Research Centre
EFSA	European Food Safety Authority
JA	Joint Action
WP	Work Package
AVSMD	Audiovisual Media Services Directive
HFSS foods	High in Fat, Sugars, Salt foods



Executive summary

This document summarizes systematically and analyzes the outcomes of six semi-structured interviews conducted by Istituto Superiore di Sanità and EuroHealthNet to EU experts on the sustainability and integration of the results of the Joint Action Best-ReMaP. The conclusions of this report, that represents the milestone 4.1 of the JA, will help to draft the roadmap towards the integration of the results of JA into EU nutritional policies

Introduction

The Joint Action Healthy Food for a Healthy Future – Best-ReMaP (2020-2023) is funded by the European Union's Health Programme and implemented by 36 partners in 24 EU Member States. This Joint Action, delivered via collaborative work of seven pan-European teams, aims to contribute to an improved quality of food supplied to European citizens by facilitating the exchange and testing of good practices. In this regard, the Joint Action identified three main areas in need of intervention, to which it dedicated its three core Work Packages:

- (1) **WP5:** The monitoring and analysis of how the food that people consume changes at the European and national level;
- (2) **WP6:** The regulations on the marketing of food and beverages to children;
- (3) **WP7:** The public procurement of healthy foods in public setting.

This document is part of the deliverables of another essential and mandatory WP of the JA Best-ReMaP, namely WP4. Led by Dr. Marco Silano of the Italian National Institute of Health (ISS), WP4 aims to transfer and integrate results of the core WPs into EU policies, thus responding to the call from several EU documents for urgent and coordinated actions for EU citizens, especially concerning food regulation in schools, and food advertisement. In this way, this JA will support EC and the Member States in implementing policies concerning food environment to make the healthy food options more accessible to EU children and citizens.

The main aim of WP4 concerns the EU level policy dialogues, since aims to collect findings from other packages to suggest modifications to the existing policies, and to make participation in policy dialogues events more attractive for EU stakeholders. This WP will thus focus on problems concerning access to healthy food – one of the topics of the EU cancer plan – drawing from EU projects such as the “Healthylifestyle4all” campaign to make healthy food accessible, the 2022 ‘Audiovisual Media Directive Service’, and the EU4health program.¹ To that end, Best-ReMaP WP4 is framed around several deliverables:

Deliverable 4.1: Goal is to develop a roadmap of relevant national and EU policies, including the list of national and European stakeholders. This will be implemented by semi-structured interviews to EU level experts (WHO Europe, DG Sante, JRC, etc.) to understand what actions make an initiative sustainable. EuroHealthNet will take part in this deliverable by helping the Italian National Institute of Health (ISS) conduct interviews with 6 key European stakeholders. These interviews are the ground-laying work to generate an overall picture of the main

¹ More specifically to the 6th part which is dedicated to healthy diets.

challenges Best-ReMaP is likely to face in terms of policy sustainability, and they will be complemented by three further interviews in early 2022. In the latter, some main findings from first interviews will be analyzed in more detail with key experts at the EU level in that specific sector.

Deliverable 4.2: Report on options towards integration into national policies and sustainability to identify EU decision makers and stakeholders linked to core WP. The experts individuated will afterwards participate in the policy dialogues events.

Deliverable 4.3: Report to the High-Level Group and then, together with representatives of member states, a decision on which policies could be implemented as best practices. To inform policy decision makers, and to favor discussion, a 'draft integration and sustainability plan' will be prepared. Outcomes of these dialogues will be discussed to assess the options, and to make recommendations on the modality to transfer the results into a EU 'Final Integration and sustainability plan' that will summarize policies proposed.

Deliverable 4.4: Stakeholders meetings to allow policy decision makers to transfer the outcomes of core WPs into national and EU policies, thus assuring the sustainability of the JA results.

Deliverable 4.5: Food information database to include results of previous EUREMO and JANPA projects and those of this JA. This will offer Member States a regular report platform to inform policy makers and favor further research.

Interviews completed for the deliverable 4.1

As a leader of the Best-ReMaP's Work Package 4, the Italian National Institute of Health (ISS) -with support from EuroHealthNet, the European Partnership for improving health, equity and wellbeing - carried out an investigation on the transfer and integration of the results of the Joint Action into EU and national policies in the food and nutrition fields. In short, the aim of this deliverable was to understand what factors make food initiatives sustainable and likely to succeed. In this regard, distinguished European experts were identified and interviewed.

Interviews methodology

The first step to achieve this deliverable involved identifying a list of the relevant experts at the European Union level in the areas covered by this Joint Action core work packages. Over the last decade, food policies have increasingly gained centrality in EU health and environmental

policies, so several agencies were considered relevant for the purpose of our interviews. Among them, we centered our attention on the European Parliament – especially considering recent developments in the ‘Farm to Fork strategy’ - and on the relevant DGs of the European Commission, such as DG AGRI, DG RTD, DG SANTE, DG CONNECT, and DG ENVI. Furthermore, the list included other relevant European bodies/authorities, such as EFSA, academics with relevant experience from European universities, and actors from involved NGOs and consultancies.

Having drafted a list of experts, we then defined the thematic areas relevant to the purpose of WP4, namely the dimensions of food policies where the main challenges in terms of policy sustainability were likely to develop. These main dimensions were pivotal in developing a relevant framework that would have then structured the questions for the interviews.² Overall, we identified six dimensions related to Best-ReMaP WPs.

First, the legislative challenges of the food system. There have been several debates concerning the integration of European policies into national legislation, but also on the relation between public regulation and private industries. These latter have often promised to adopt self-regulations to reduce problems related to unhealthy diets, but the criteria adopted by food industries have been criticized by many as being too lenient. For food policies sustainability, it is thus necessary to understand better how European legislation can be integrated into national policies, and how private industries can be voluntarily involved in efforts, and compelled, where necessary, to create healthier food environments.

Second, food systems are inextricably connected to the aspect of social fairness. For a policy to be sustainable, it has to be socially fair, so any food policy ought to consider how it affects the most vulnerable groups, and what should be done in order to minimize inequalities – in this case especially health inequalities - resulting from political decisions. This has always been the case, but the Covid-19 pandemic has stressed even further the necessity to make sure that our societies are not two-tier systems where lower socio-economic classes struggle to access healthy food environments, so questions were also formulated to investigate if and how the pandemic changed the framework concerning food policy.

Third, reflecting WP6 focus, a relevant topic concerns the impact of food advertisement on the people’s health, especially children. This is a broad topic, so it had to be narrowed down to

² In the Annex A at the end of the document, it is possible to find the complete list of questions. Note that this was used by officers as a general template, so final questions asked were further developed in order to match even closely the specific knowledge and experience of the expert interviewed.

address more specific issues, such as the new challenges posed by advertisement on digital platforms. Moreover, this debate concerns not only *how* advertisement ought to be regulated, but also *who* should be doing so. That is, Ministries of Health are not the ones in charge of media regulation, so there is the risk that health may be neglected in these policies.

Fourth, food policies are tightly connected to environmental ones, as proven by the importance given to food systems by the Green Deal and the Farm to Fork strategy. Questions thus had to address challenges concerning how to render food production more environmentally sustainable, how to reduce its carbon footprint, and which steps to undertake to favor the transitions towards organic, green, and short-chain food systems, including in enabling sustainable behaviors and choices.

Fifth, data-based action is essential to structure effective policies, so research and innovation are two fields essential for sustainable food systems. This dimension thus concerned the role of research, the challenges it faces, and how research could be better integrated into the European policy framework, to lead to a better informed and more efficient action on food systems.

Sixth, public procurement is a focus of JA Best-ReMaP, so partners indicated that we needed more information concerning its implementation in different member states, on the criteria used to select public contract, and on how this instrument could be used to tackle health inequalities, especially for schools' canteens.

These two aspects, namely identifying the institutions where experts worked, and the main questions to be asked on the debate concerning food policies, framed the background work for the interview process. Having completed this first step, we proceeded to invite the experts identified,³ and to conduct 30-minutes online interviews via 'Microsoft Teams' communication tool. All interviewees signed a consent form meant to clarify that the interviewee's privacy rights were protected (in line with the EU GDPR), and to ask them the consent to use their names in the report. Overall, six interviews were completed between September and October 2021.

The interviews were performed by two officers from EuroHealthNet staff with the support of WP4 leader Dr. Marco Silano. The team decided that a semi-structured interview was the best suited methodology for the purpose of this deliverable. This methodology offers a guideline to

³ A template of the invitation letter is available at the end of the document in the Annex B. After this first invitation, the team also sent reminders to the experts from which we had not received a reply, and these reminders have proved to be beneficial, since we arranged to schedule some of the interviews only following this reminder.

the interviewer, offering her at the same time a certain degree of liberty to ask follow-up questions, or to ask completely new questions according to what emerges from the experts' answers. At the same time this format provided the interviewees the ability to express themselves and to raise issues that they considered important.

As aforementioned, a general list of questions was drafted on the five identified dimensions of the debate, and from this list, interviewers chose the most pertinent questions to the specific expertise of the interviewed, adapting the text accordingly. Due to the relatively short time – 30 minutes – we decided to select three main questions. An introductory and general one centered on the work currently done by the interviewed, followed by two more specific questions that investigated the connection between the experts' work, and the goal of the WP4.

Outcomes of the interviews

Even though experts had diverse backgrounds and worked on different areas, common topics emerged in most of the interviews, thus underlining the similarities of the challenges faced at the EU level in terms of policy integration and sustainability. Among the inputs received in the interviews, we found six key points that well summaries the main challenges Best-ReMaP Joint Action ought to address to grant the sustainability of its outcomes.

Differences across EU countries

Experts pointed out that there is tension between Union level policies and Member states. Final policy decisions are often to be taken by Member states, so the EU can only act as a controller, consultant, or supervisor, which makes it difficult to implement a comprehensive approach throughout the European Union. For example, talking about the "EU school fruit, vegetables, and milk scheme", an expert mentioned that adopting a comprehensive approach regarding vending machines and school meals would help render healthier environments across schools in the EU. However, this programme does not have competences in that regard, so it cannot intervene on what vending machines can sell. They can only offer a list of the eligible products, but it is up to the national or regional level to take decisions or to regulate this framework.

DG Research & Innovation stressed also that a lack of integration between Union and national policies limits not only the regulation process, but also the learning from the so called 'best practices'. Projects occurring at the local level are often one step ahead of those at national

and supranational level, so we could achieve several positive results if these local actions could be better supported by EU institutions. An increased focus on integration has yet to be balanced with the fact that Member States start from vastly different economic, social, and cultural backgrounds, and they thus may have quite different means and needs. For example, DG Agriculture stressed that in terms of organic production, their programme must deal with significant differences at national level, as proven by the fact that while only 0,5% of food production is organic in Malta, this is already above 25% in Austria.

This is a significant issue from a policy perspective, since it entails that actions that could be implemented in one country are not necessarily feasible in neighbouring ones. On the contrary, each state has its unique situation, so it is not always possible – and above all preferable - to implement a “one size fits all” policy across all European countries. This was described by Davide Arcella – team leader of the data unit at the European Food Safety Authority (EFSA) – regarding the collection of food consumption data in EU member states. He mentioned the difficulty of harmonizing this data, since countries were using diverse methodologies that were difficult to compare, and EFSA did not have the funding necessary to develop a unique dietary survey.

Inadequate funding is often mentioned as the main barrier to the implementation of EU projects encouraging member states to adopt common, comparable, tools and approaches, but experts stressed that it is also necessary to consider differences in competencies and traditions at member state level. An important detail added by EFSA was that harmonizing methodologies at the EU level is complex not only because some countries need more support than others, but also due to the resistance to change from those countries that feel they have well developed and functioning systems in play since they do not want to replace a methodology that has proven to be successful. Hence, when trying to harmonize tools and methodologies across Member states, policymakers should be aware that national institutions may be resistant to external impositions, since they see maintaining their own programmes to preserve their own approaches, and to stay in charge in their own country.

In sum, the policy challenge concerns finding a harmonized balance between the need to develop holistic policies at the Union level and the need to respect (sub-) national methodologies, expertise and sovereignty. Otherwise, if EU policies were to be imposed on Member states in a top-down manner, they would face significant resistance because it would seem that EU institutions are trying to impose on Member States in areas in which they do not have the competence to do so. Therefore, the interviewees indicated that the most efficient

policy strategies point towards a development of national plans according to Union directives, where Member states develop their own plans that set out how they plan to achieve a common set of objectives set out at EU level, in order to access EU support or funding. In this way, for each target of a selected European strategy, Member states would set out their national ambitions, and specify how they plan to reach them, as in the Green Deal.

Food systems and individual behavior

Experts also underlined the importance of enhancing a multi-sectoral approach to avoid implementing fragmented actions. The problem is that ministries at national level are not cooperating effectively, especially regarding advertising and public procurement policies, and health authorities are not yet sufficiently involved in the regulation of these sectors. In this way, health consequences of certain policies may be neglected since ministries other than health may not prioritize citizens' health in their policy actions. According to DG Research & Innovation, all actors in the food chain have to work well together if we are to deliver co-benefits to the whole community. To do so, we also ought to frame these interventions on upstream actions rather than top-down policies, since the former adapt better to the people's needs, while it is difficult to retrofit or to change the latter once policymakers have decided how to implement them.

In the policy fields covered by Best-ReMaP WP4, focusing on a multidisciplinary approach implies working on food environments, namely at the point of contact where citizens make their decisions on what they consume. Understanding the context in which citizens make decisions about food is essential to understanding the choices they make, so a multi-sectoral and multi-actor approach is necessary to grasp all the factors that influence individual behavior. According to DG SANTE, this is an aspect on which literature has improved over the last few years, proving that the narrative of freedom of choice is deeply flawed. Evidence is now clear on the fact that individual decisions are highly influenced by our social environment, and the fact that companies invest lots of resources in marketing is an example of this.

However, Herbert Dorfmann – Member of the European Parliament for the European People's Party from Italy - stressed that we cannot focus only on external factors, since we must also acknowledge that consumers' decisions play a significant part in determining the food system framework. Consumers take daily decisions when they purchase food in the supermarket, so they are not 'responsibility free', but it is also up to them to take the healthy choices over the

unhealthy ones, thus influencing the food chain towards healthier and more sustainable actions. Policies such as the 'Farm to Fork strategy' thus must be improved in this regard, since they are too narrowly focused on farming, while they neglect the consumer side of the food chain.

Focusing on the latter entails giving priority to information and consumer education rather than regulating the food environment, since this view holds that a lot of the information that is currently available about what is 'healthy' and sustainable is misleading or wrong. For example, Dorfmann stressed in his interview that certain food groups such as fats or sugars are not unhealthy *per se*, but they become so if assumed in excessive quantity. For this reason, rather than 'demonizing' certain food groups, he argued that it is more important that consumers are both educated about the right balance necessary for a healthy diet, and are not swayed by misleading information, as it is too often the case in current food labelling systems, as in some countries' 'Nutriscore'. That is, in his opinion 'Nutriscore label' is still too influenced by the food industry, and thus needs to be reviewed to focus more on citizens' health.

According to DG SANTE, a good monitoring reformulation system is an example of how these different views could be balanced. If we find a way to clearly describe to every consumer the content of the food they buy, this would give them the information they need to make the healthier choice. There is nowadays more awareness among the consumers compared to the past, but many would still be surprised if they had a clearer understanding of the composition of some of the products they buy, as for example the percentage of sugar contained in several breakfast cereals. Hence, the debate should then be about how we can then enable consumers to make the 'easy choice', and food labels are often at the center of this debate.

Citizens may find it confusing to deal with various kinds of labels, so these ought to be compatible and coherent one with another, in order to frame a system that is clear, common (European), easy to understand, public, and that is not misleading. Therefore, to foster the sustainability of its results, Best-ReMaP has to focus on cooperating with NGOs, academia, and EU bodies to increase awareness and control on food environments. In this way, this JA can enhance a healthier framework where consumers will still have the choice options, but it will be much easier than it currently is to take the healthy decision.

The need for a flexible legislation

Legislation on food policies is facing a “developing battle”, since it occurs in a framework where new information constantly changes the context policymakers are trying to regulate. It is necessary to find a balance between having legislation in as well as the flexibility to adapt this to new research, developments in different national contexts, and to the fast-changing markets. This concerns not only the ‘items’ to regulate, but also regulators themselves, since individuals working in the various DGs are often changing, with new people may not have the connections that their predecessors had. A better coordination among DGs and between DGs and external bodies would render policy implementation much more effective.

According to the interviewed, the capability to adapt and to replicate previous projects in new contexts is crucial to the success of the Best-ReMaP. Ideally, the main objective of this JA should thus be to contribute to the implementation of at least one new policy in at least one of the Member states involved in the JA for each of the three main work packages. Instead, if at the end of the project Best-ReMaP produces only a set of recommendations, it cannot be considered a success. This is important because if countries see that initiatives were successful in some other constituencies, then they are more willing to start a similar programme on their own. On top of that, if countries are provided both the connections to learn from the experiences of those who implemented the project beforehand, and the resources and support from the EU resources – such as Best-ReMaP offers - then they are more likely to succeed.

As stressed by DG Research & Innovation, rather than focus only on ‘best practices’ here should also be a focus on how to avoid bad practices. That is, in order to avoid spending money on something not useful, it is necessary to understand in more detail how bad policies have worsened food system, especially concerning advertising. However, to do so we need to discern more precisely ‘for whom’ certain policies may be damaging, since different values and political views create divergences in what is deemed ‘bad advertisement’ and who suffers more the consequences of certain political decisions.

This contrast was evident in Dorfmann’s interview, where he specified that a regulation on advertisement is necessary for children, but not for adults. That is, while other interviewed preferred a holistic view on food systems with a specific control on the inputs *all* consumers receive, according to Dorfmann this should be the case for children, especially in light of the high amount of time they spend on digital platforms, but adults should be able to decide for themselves. Hence, the fact that Dorfmann believes that it makes no sense to control

advertising targeting adults reflects that policymakers have different views not only about what we ought to regulate, but also about which social groups to target.

Research support to policymaking

Investment in research is essential to enable data-driven policies, but at the same time experts stressed that there is a long-term issue to resolve for research to integrate at best policy making. As stressed by DG Research & Innovation, research does a lot while funding is in place, but it stops being efficient when funding ends. There is thus the need to develop better investments plans for research, making sure that projects focus more on what occurs after they end. All research initiatives should take this into account as of their inception, and this emphasizes that Best-ReMaP too should consider from the outset its long-term goals and financial sustainability.

Research is often needed to clarify policy problems. A lack of consensus around theoretical or conceptual issues can thwart efforts to develop policies to regulate food systems, like those that are the focus of Best-ReMaP. This problem is well represented by the conundrum concerning what “healthy” means. This is a complicated matter of debate because there is not a single answer, but there are differences in diet both at national and at individual level. Moreover, citizens have different lifestyles and different caloric consumption, so there could be objections to limitations on certain foods - such as HFSS (high fat, sugar, salt) foods – on the basis that elevated levels of physical activity and an active lifestyle could counteract the negative effects of these food groups.

The difficulty in precisely defining the thresholds above which certain foods are “unhealthy”, and the situations in which they can be considered as such are thus slowing down food regulation. This entails that we need more research not only to develop clear guidelines according to the different national and local level, but also to have a clearer framework of the food environments we ought to regulate. For example, a clear and precise definition is one of the strength points of the organic label. Not only is this label clear to the consumer, but the fact that there are precise criteria to define what organic is, permits the development of a precise set of rules, legislation, and control.

Connection between public and private sector

One of the problems Best-ReMaP must consider is also that there are many legitimate interests involved in food systems - from public health, to industries, NGOs, etc. – that are difficult to harmonize, since when people from vastly diverse backgrounds are involved in the same project, they may just focus on finding a minimum common denominator. In this way, responsibilities may become diluted and actors may not focus on finding the most ambitious approach for the project. This is true for all sectors, but it is particularly evident when we discuss the best way to balance public goals and private sector interests.

On this issue, participants to the interviews had different opinions. On the one hand, some stressed the importance of sitting together with the private sector to obtain concrete commitments from industries in terms of increasing production, accessibility, and affordability of ‘sustainable’ products. Overall, this view is based on the idea that the private sector will be more likely to adapt to the sustainability standards if this is likely to benefit them as well. On the other hand, other experts were more concerned about the risks that would result from even greater involvement of the private sector in food system regulation.

For example, EFSA does not involve the private sector in the collection of data, since this could bias the outcomes and in data survey, there is also a problematic connection between money invested in a certain project and the availability of outcomes. Survey research is expensive, so if one organization spends a lot of money on data collection, then it might not be willing to make data available to everyone for free before fully exploiting such data. As mentioned by Davide Arcella: “The idea itself that someone spends a lot of money to then make it available to everyone, is perfect in the ideal, but then in the real world, if everyone acted as a free rider, then we would have no one collecting data”. Therefore, public investment is to be preferred because the more data comes from public money, the easier it is to render it available to everyone afterward, and public money can be more easily steered towards public goals such as healthy diets.

Finally, some interviewees also expressed scepticism at the private sector’s ability to voluntarily self-regulate. For example, Dorfmann maintained that since industries’ primary goal is to sell their products to make profits, and not to promote citizens’ health. If we left too much power in the hands of food producers, as it is currently happening with the ‘Nutriscore’ labelling, it would then be difficult to obtain proper regulations. To be successful in the regulation of food systems, a code of conduct as the one mentioned in the ‘Farm to Fork strategy’ may thus not be

sufficient. On the contrary, legal actions, clear regulations, and public investment may favour the creation of a healthier food environment.

Health inequalities

Finally, interviewees believed both EU institutions and Member states will have to continue working on the area of ‘non communicable diseases’, since these represent almost 80% of the burden in terms of illnesses and money spent, and most of them can be prevented if we improved the people’s lifestyles and nutrition. Best-ReMaP thus ought to focus on integrating its results into the national action against NCD. To do so, experts stressed that social equity should be at the centre of this JA, since food environments must not become two-tier systems where vulnerable groups are left behind.

Food systems must then focus not only on health and sustainability, but also on *inclusiveness*, namely on making sure that ‘healthy food environments’ are accessible and available to all citizens in society. In this regard, public procurement policies have the potential to lead to highly beneficial outcomes, since meals in public institutions – especially for children in school – are the only opportunity to access healthy food for certain disadvantaged categories. This is not only a question about access to healthy nutrition, but also of education, since public procurement offers also a powerful means to educate citizens about the importance of healthy diets.

According to DG AGRI, the importance of considering health inequalities is well represented on two sides by the challenges faced by organic products. On the one hand, there is the need to make sure that organic products become more and more the mainstreamed, as is the case in the Scandinavian model, rather than a niche product that only higher classes can afford. On the other hand, this control on prices has to be balanced with the need to make sure that there is sufficient income for farmers. In this regard, organic farming enables rural areas to create wider local benefits, thus proving that there is a way to create a coherent package of policies that are simultaneously socially responsible and provides wider benefits to all social groups.

Finally, DG SANTE stressed that to ensure the sustainability of Best-ReMaP outcomes, there is the need to promote the importance of the connection between the social gradient and NCDs also amongst those that have so far neglected this aspect. That is, while agencies promoting environmental awareness have been effective in increasing the awareness of the risks of



climate change, those involved in food systems have not managed to be as successful. For this reason, Best-ReMaP should also try to exit the ‘bubble’ of those supporting and promoting healthy food systems to engage in a dialogue with those MPs, industries and people that have neglected or opposed measures aimed at tackling health inequalities in this framework. In other words, results of this JA should reach not only those actors already convinced about the importance of Best-ReMaP motto “Healthy food for a healthy future”, but they should also try to engage with those industries and politicians who have so far neglected the importance

ANNEX A: List of Questions for the Best-ReMaP Interviews

1. LEGISLATIVE CHALLENGES

- a. **Past Vs Future:** Over the last decade, the EU has implemented several regulations in the food chain framework, yet without achieving the results expected.
 - I. Question: “Which, in your opinion, is the main problem/obstacle EU policies have faced over the last decade concerning the regulation of food systems?”
 - II. Follow-up: how can we overcome past hindrances in order to better regulate EU food system?”.
- b. **Self-regulatory debate:** industries have promoted their self-regulation over the last few years, while WHO stressed that this has created several problems, since it includes less ambitious thresholds than what’s recommended by science and it leads to little or no punitive actions.
 - I. **Question:** “How can EU institutions work to balance control/incentives for industries at the national level in order to have them on board rather than against healthier food policies?”
- c. **Centrality of the EU**
 - I. **Question:** “What’s the interplay between EU and MS policy/funds/legal level? Are national frameworks supportive or counterproductive to the implementation of EU policies?”
- d. **EU tools and instruments:** there are several EU processes that can be useful to advance the sustainability of Best-ReMaP findings at strategic as well as practice levels such as the European Semester, EU cancer plan, Farm to Fork, the Technical Support Instrument, the EU Child Guarantee and national action plans, the Recovery and Resilience Funds and plans per country etc.
 - I. **Question:** “Which tools and instruments holds most potential for sustainable Best-ReMaP outcomes at strategic and practice levels, and why?”

2. SOCIAL FAIRNESS AND HI

- a. **Social fairness and HI:** one of the experts mentioned that JA can be sustainable only as long as it is socially fair.
 - I. **Question:** How do you think concerns related to health equity impact on how sustainable a given food policy option will be?

- b. **Covid-19 pandemic:** the pandemic has affected HI in several ways throughout Europe. In many countries we have seen an increase of unhealthy behaviours (related to food, tobacco, alcohol, etc.) in vulnerable subgroups.

- I. **Question:** “Which problems do you think this pandemic has highlighted that must be considered to improve our societies’ preparedness for future crises?”
- II. **Follow-up:** What role do you envisage for EU institutions in this regard?

3. FOOD AND ADVERTISEMENT

- a. **AVSMD and Health:** the former may be difficult to connect with the latter in Member States, since health ministries are not in charge of AVSMD.

- I. **Question:** “How do you think we could better connect AVSMD and health to make sure that the latter is included in MSs advertisement policies?”
- II. **Follow-up:** What role could the EU have to enhance cross-border control?

- b. **Digital platform:** policies are still focusing too narrowly on television, whereas citizens – children in particular - are consuming various platforms. In terms of sustainability, it is thus necessary to understand which platforms we ought to target specifically.

- I. **Question:** “Which platforms do you think should be included in advertisement policies (Out-of-home (OOH) foods, social media, digital marketing (influencers, etc.)?”

- c. **Nutritional Profile Model:** JA focuses on finding precise EU Nutritional Profile Models (NPM), since this would help giving clear indications to MSs (especially in WP6) => the clearer, the easier to follow.

- I. **Question:** “how can we obtain a clear and uniform ‘Nutritional Profile Model Across Europe?’”.
- II. **Follow-up 1:** “Do you think it is mostly a matter of adopting the WHO NPM model or are there further challenges that ought to be addressed?”
- III. **Follow-up 2:** “Do you think the nutritional label on products (A, B, C, D, E) is a positive step forward? Can it also be applied to regulate marketing products?”

4. **SUSTAINABLE AND GREEN:** the climate challenge is a crucial political challenge, and food production/consumption has a significant carbon footprint.

- a. **Question:** "Which steps forward could be made at EU levels related to HFSS food in order to better address the environmental challenge?"

- I. **Follow up:** "is there potential for an EU harmonized framework for action on green and healthy food procurements in public setting?"

- b. **Sustainability question:** "Do you think there is a tendency for companies to be willing to sacrifice some profit to help address these issues (by e.g., curbing advertising to children or reformulating foods), or will they only take those actions if this enables them to maintain or exceed current profit margins (and/or if coerced by legislation)?"

5. **RESEARCH AND LITERATURE:** data-based action is essential to structure policies.

- a. **Question:** "Is the state of evidence sufficiently clear to frame precise policies?"

- I. **Follow-up:** "Which gaps are there, and where should we invest to fill these gaps?"

6. **PUBLIC PROCUREMENT**

- a. **Exemption implementation:** "To support local food production in Slovenia an exemption for public food procurement was applied (an exemption means that 20 % of purchased food is excluded from the public food procurement). In which way do you think the exemption could be introduced/used in other countries?"
- b. **Criteria for selection of public contract:** "How to encourage the use of environmentally focused sustainability criteria as the main factor for the selection of public contract?"
- c. **Tackling inequalities:** "What policy solutions in the field of public food procurement could further increase equity by reaching vulnerable groups with healthy food?"

ANNEX B: Template Invitation email letter to Best-ReMaP experts

Dear [name of Expert],

I hope my e-mail finds you well.

I am contacting you on behalf of the Joint Action Healthy Food for a Healthy Future – Best-ReMaP (2020-2023), funded by the European Union's Health Programme, and implemented by 36 partners in 24 EU Member States.

This Joint Action, delivered via collaborative work of seven pan-European teams, aims to contribute to an improved quality of food supplied to European citizens by facilitating the exchange and testing of good practices concerning: (1) the monitoring and analysis of how the food that people consume changes at the European and national level; (2) the regulations on the marketing of food and beverages to children; and finally (3) the procurement of food by public bodies for educational institutions, social care facilities, etc.

As a leader of the Best-ReMaP's Work Package 4, the Italian National Institute of Health (ISS), with support from EuroHealthNet – the European Partnership for improving health, equity and wellbeing, are responsible for transfer and integration of the results of the Joint Action into EU and national policies in the food and nutrition fields. In contribution to this effort, we still need to carry out an investigation into what actions and factors make initiatives sustainable and likely to succeed. We have identified a number of key EU policies and distinguished European experts – such as yourself – who we would like to carry this investigation with. We strongly believe your expertise and knowledge in the field will offer pivotal insights into furthering the work of this Joint Action.

Therefore, we would be very pleased if you accepted to participate in a 30-minute-online interview. In the interview, we would like to focus on X (policy area of the question), with a couple of more specific question centered on Y (what the specific questions are about, but without being too detailed so as to leave some range of action to the interviewer). After – hopefully - hearing back on your willingness to participate, we will follow up in proposing and selecting the most suitable day and time. The interviews will be conducted *date indication* (during the month of October 2021).

Should you need any further details, please do let us know. We look forward to your affirmative response.

Yours sincerely,



On behalf of the Joint Action Best-ReMaP, the Work Package 4 and Marco Silano (ISS),

Signature of the Policy Officer.



Best-ReMaP

Healthy Food for a Healthy Future

Milestone 4.2

Summary report of the analysis of the interviews with EU experts on the integration and sustainability of Best-ReMaP outcomes

Grant Agreement Number 951202

Istituto Superiore di Sanità and EuroHealthNet, WP4

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Content of Annexes

Annex A: List of Questions for the Best-ReMaP Interviews

Annex B: Template Invitation email letter to Best-ReMaP experts

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Contributors and Acknowledgements

This document was prepared by Istituto Superiore di Sanità, Roma Italy and EuroHealthNet, Brussels, Belgium, in the context of the activities of the Joint Action Best-ReMaP Work Package 4 on sustainability and integration in the national policies.

The Authors are deeply grateful to the Experts who made themselves available for the interviews, their time and their invaluable contributions.

The Authors would like to thank to all partners engaged in the Joint Action for their suggestions in drafting the questions and feedback on the findings of the first round of the interviews.

Abbreviations

AVSMD	Audiovisual Media Services Directive
DG	Directorate-General (European Commission)
DG AGRI	Directorate-General for Agriculture and Rural Development
DG CONNECT	Directorate-General for Communications Networks, Content and Technology
DG ENVI	Directorate-General for Environment
DG GROW	Directorate-General for Internal Market, Industry, Entrepreneurship and Small and Medium Enterprises
DG RTD	Directorate-General for Research and Innovation
DG SANTE	Directorate-General for Health and Food Safety
EFSA	European Food Safety Authority
EU	European Union
GDPR	General Data Protection Regulation
HFSS foods	High in Fat, Sugars, Salt foods
JA	Joint Action
JRC	Joint Research Centre
NGO	Non-Governmental Organisation
WHO	World Health Organization
WP	Work Package

Glossary

Term	Definition
Chronic diseases	Diseases that are not passed from person to person. They are of long duration and generally slow progression. The four main types ... are cardiovascular diseases (like heart attacks and stroke), cancers, chronic respiratory diseases (such as chronic obstructed pulmonary disease and asthma) and diabetes. ¹
Policy dialogue	A policy dialogue is an essential component of the policy and decision-making process, where it is intended to contribute to informing, developing or implementing a policy change following a round of evidence-based discussions, workshops, and consultations on a particular subject. It should be seen as an integrated part of the policy-making process, and can be conducted at any level of the health system where a problem is perceived and a decision, policy, plan or action needs to be made.
Obesogenic environments	The sum of influences that the surroundings, opportunities, or conditions of life have on promoting obesity in individuals or populations
Sustainable food system	<p>A food system that complies with the following:</p> <ul style="list-style-type: none"> • Ensuring that the food chain, covering food production, transport, distribution, marketing and consumption, has a neutral or positive environmental impact; • Helping to mitigate climate change and adapting to its impacts; • Ensuring food security, nutrition and public health – making sure that everyone has access to sufficient, nutritious, sustainable food that upholds high standards of safety and quality, while meeting dietary needs and food preferences; and • Preserving the affordability of food, while generating fairer economic returns in the supply chain, so that ultimately the most sustainable food also becomes the most affordable.

¹ Source: http://www.who.int/topics/noncommunicable_diseases/en/



Executive summary

This document summarizes systematically and analyses the outcomes of ten semi-structured interviews conducted by Istituto Superiore di Sanità and EuroHealthNet to EU experts – selected from the European Commission, the European Parliament, and NGOs involved in food and nutrition policies - on the sustainability and integration of the results of the Joint Action Best-ReMaP. A first round of interviews to six experts was conducted between October and November 2021, while a second round of four interviews took place between February and April 2022.

As explained in the methodological section below, the research team framed the interviews around the thematic areas relevant to the purpose of WP4, namely the dimensions of food policies where the main challenges in terms of policy sustainability were likely to develop, such as the legislative challenges, questions on social equity, the environmental impact of food and nutrition policies, and the integration between European and MSs policies.

The transcription and analysis of the interviews revealed a framework where experts agreed on the relevance of several common challenges - such as the connection between public and private interests and the integration of EU level policies into the MSs policies – but where there are different and at time contrasting opinions on the policies needed to tackle such challenges. For this reason, the report provides a rather comprehensive overview of the JA Best-ReMaP policy framework, and of the challenges that will need to be addressed to ensure the sustainability of the results of this JA at the European level. In this way, the conclusions of this report, that represents the milestone 4.2 of the JA, will help to draft the roadmap towards the integration of the results of JA into EU nutritional policies

Introduction

The [Joint Action Healthy Food for a Healthy Future – Best-ReMaP \(2020-2023\)](#) is funded by the European Union's Health Programme and implemented by 36 partners in 24 EU Member States. This Joint Action, delivered via collaborative work of seven pan-European teams, aims to contribute to an improved quality of food supplied to European citizens by facilitating the exchange and testing of good practices. In this regard, the Joint Action identified three main areas in need of intervention, to which it dedicated its three core Work Packages (WP):

- (1) **WP5:** The monitoring and analysis of how the food that people consume changes at the European and national level;
- (2) **WP6:** The regulations on the marketing of food and beverages to children;
- (3) **WP7:** The public procurement of healthy foods in public setting.

This document is part of the deliverables of another essential and mandatory WP of the JA Best-ReMaP, namely **Work Package 4 on sustainability and integration into national policies (WP4)**. Led by Dr. Marco Silano of the Italian National Institute of Health (ISS), WP4 aims to transfer and integrate results of the core WPs of this Joint Action into EU policies, thus responding to the call from several EU institutions and stakeholders for urgent and coordinated actions on food and nutrition systems in the EU, especially concerning the regulation and procurement of foods in educational and institutional premises, food reformulation and advertisement policies and practice. In this way, this JA will support EC and the Member States in implementing policies concerning wider food environment to make the healthy food options more accessible to EU children and citizens.

The main objective of WP4 concerns convening policy dialogues at the EU level, supported by the findings of other core WPs to suggest modifications to the existing food policies, and to make participation in policy dialogues events more attractive for EU stakeholders. This WP thus focuses on problems concerning access to healthy foods and diets – one of the objectives of the EU flagship initiatives such as [Europe's Beating Cancer Plan](#) and the [EU Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system](#) – plus drawing from other EU proposals such as the [NCDs Healthier Together EU Initiative](#), ["Healthylifestyle4all" campaign](#), [reviews of the EU Food Information to Consumers laws](#), a new [European Commission Communication on food security and resilience of food systems](#),² an [EU](#)

² Acting as a response for the EC to food insecurity issues due to the war in Ukraine

[sustainable food systems initiative](#). Last but not least, it draws from the EU4Health³ and Horizon Europe programmes' priorities for the prevention of non-communicable diseases (NCDs) through a comprehensive redress of food environments. To that end, Best-ReMaP WP4 is framed around several tasks:

Task 4.1: The goal here is to develop a **roadmap of relevant national and EU policies**, including the list of national and European stakeholders important for their design, implementation, and monitoring. This will be implemented by semi-structured interviews with a number of EU-level experts (WHO Europe, DG Sante, JRC, etc.) to understand what actions make an initiative sustainable. EuroHealthNet took part in this deliverable by helping the Italian National Institute of Health (ISS) conduct six interviews with key European stakeholders. These interviews focused on the main challenges Best-ReMaP is likely to face in terms of policy sustainability, and they have been complemented by four further interviews completed between February and March 2022. The purpose of the additional interviews was to deepen our understanding on key outcomes of the first round-findings, investigate new ideas and diverging opinions between EU experts in the public health, food and internal market fields.

Task 4.2: The aim of this task is **to identify EU policy decision makers and the stakeholders linked** to the activities of WP5, WP6 and WP7. The mapping will focus on governmental and institutional stakeholders and the outcomes will provide a pool of participants for the policy dialogue events in task 4.4. This work will be performed in alignment with the WP10 of the EU-funded Horizon 2020 [STOP project](#). Alongside this, an Advisory Board in the form of the Policy Decision Makers Forum (PDMF), which includes representatives of the European parliament and European Commission will facilitate the policy decision making level stakeholder involvement in the process.

Task 4.3: The first step of the integration of relevant policies is the discussion to the Steering Committee on Health Promotion and Disease Prevention. The coordinator of the JA and the WP4 leader will report regularly to the above-mentioned SC about the results of the JA. With the representatives of the MSs, it will be decided what policies resulted from the JA to implement in the MSs. The results will then feed into the 'Final Integration and Sustainability Plan' that will summarize the proposed policies and the modality to change existing measures

³ More specifically to the 6th part which is dedicated to healthy diets.

at European and MS level. The report and possibilities for implementation will be discussed during the Policy dialogue briefs at task 4.4. and within the scope of the HLG.

Task 4.4: To implement this task, a series of stakeholder meetings will be organised to allow policy makers to transfer the outcomes of the core WPs into their national and EU policies and legislation, therefore ensuring the sustainability of the JA results. Guidelines and recommendations by public health authorities, legislative acts, etc., will be prepared through discussion with the national policy makers and other key stakeholders. There will be four policy dialogue brief in total, and they will focus (1) on the outcomes of the JA, (2) on the current situation in the EU/MS involved, (3) on the stakeholder engagement, and (4) on the reporting from the MSs on the policies to be transferred into their national guidelines.

Task 4.5: Linking the results of the core WPs, a food information database will be developed by the European Commission's Joint Research Center (JRC). This database will offer to the Member States a long-lasting tool to regularly report the national data to the JRC food database and to explore the data and make it available to researchers and public policy advisors for the national policies and legislation. WP4 will synthesize the policies, mainly monitoring of reformulation (WP5) and of reducing (digital) food marketing to children (WP6) and public food procurement (WP7) by exploring and developing the options to use JRC database as the source of aforementioned information. Food systems indicators may be possibly developed and the data will rely on the new JRC food database.

Interviews completed for the milestones 4.1 and 4.2.

As a leader of the Best-ReMaP's Work Package 4 on sustainability and integration in the national policies, the Italian National Institute of Health (ISS) - with support from EuroHealthNet, the European Partnership for improving health, equity and wellbeing - carried out an investigation on the transfer and integration of the results of the Joint Action into EU and national policies in the food and nutrition fields. In short, the **aim of this deliverable was to understand what factors make food initiatives sustainable and likely to succeed**. To this end, distinguished European experts were identified and interviewed.

Interviews: the methodology

The first step to achieve this deliverable involved identifying a list of the relevant EU-level experts in the areas covered by this Joint Action core work packages, namely **WP5** on EU harmonised reformulation and processed food monitoring, **WP6** on best practices in reducing marketing of unhealthy food products to children and adolescents, and **WP7** on public procurement of food in public institutions.

Over the last decade, food policies have increasingly gained centrality in EU health and environmental policies, therefore several European Agencies and Institutions were considered relevant for the purpose of our interviews. Among them, we centred our attention on the two most influential institutions at policy level for European food system policy, namely the **DGs of the European Commission** that are involved in the regulation of sectors connected to food systems and nutrition, such as DG AGRI, DG RTD, DG SANTE, DG CONNECT, DG GROW and DG ENVI, and the **European Parliament** – especially considering recent developments in the ‘Farm to Fork strategy’. Furthermore, the list included other relevant European bodies/authorities, such as the European Food Safety Authority (EFSA), academics, and relevant EU Public Health Non-Governmental Organisations.

Having drafted a list of experts, we proceeded to define the thematic areas relevant to the purpose of WP4, namely the dimensions of food policies where the main challenges in terms of policy sustainability were likely to develop. These main dimensions were pivotal in developing a relevant framework that would have then structured the questions for the interviews.⁴ Overall, we identified six dimensions related to Best-ReMaP core WPs.

1) Legislative Challenges of the food system	There have been several debates concerning the integration of European policies into national legislation, but also on the relation between public regulation and private industries. These latter have often promised to adopt self-regulations to reduce problems related to unhealthy diets, but the criteria adopted by food industries have been criticised by many as being too lenient. For food policies sustainability, it is thus necessary to understand how European legislation can be integrated into national policies, and how private industries
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⁴ In the Annex A at the end of the document, it is possible to find the complete list of questions. Note that this was used by officers as a general template, so final questions asked were further developed in order to match even closely the specific knowledge and experience of the expert interviewed.

	can be voluntarily involved in efforts, and compelled, where necessary, to create healthier food environments.
2) Social Fairness	For a policy to be sustainable, it has to be socially fair, so any food policy ought to consider how it affects the most vulnerable groups, and what should be done in order to minimise inequalities – in this case especially health inequalities - resulting from political decisions. This has always been the case, but the Covid-19 pandemic has stressed even further the necessity to make sure that our societies are not two-tier systems where lower socio-economic classes struggle to access healthy foods in increasingly unaffordable and unavailable food environments, so questions also investigated if and how the pandemic changed the framework concerning food policy.
3) Impact of food advertisement on the people's health, especially children	This is a broad topic, so it had to be narrowed down to address more specific issues, such as the new challenges posed by advertisement on digital platforms. Moreover, this debate concerns not only how advertisement ought to be regulated, but also who should be doing so. That is, Ministries of Health are not the ones in charge of media regulation, so there is the risk that health may be neglected in these policies.
4) Environmental Policies	Food policies are tightly connected to environmental ones, as proven by the importance given to food systems by the European Green Deal and the Farm to Fork Strategy. Questions thus had to address challenges concerning how to render food production more environmentally sustainable, how to reduce its carbon footprint, and which steps to undertake to favour the transitions towards organic, green, and short-chain food systems, including in enabling sustainable behaviours and choices.
5) Research and Innovation	This dimension concerns the role of research, the challenges it faces, and how research could be better integrated into the European policy framework, to lead to a better informed and more efficient action on food systems.
6) Public Procurement	Public procurement is a focus of JA Best-ReMaP, so partners indicated that we needed more information concerning its implementation in different Member

	states, on the criteria used to select public contract, and on how this instrument could be used to tackle health inequalities, especially for schools' canteens.
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These two aspects, namely identifying the institutions where experts worked, and the main questions to be asked on the debate concerning food policies, framed the background work for the interview process. Having completed this first step, we proceeded to invite the experts identified,⁵ and conducted 45-minutes online interviews via 'Microsoft Teams' communication tool. All interviewees signed a consent form meant to clarify that the interviewee's privacy rights were protected (in line with the EU GDPR regulation), and to ask them the consent to use their names in the report. Overall, six interviews were performed between September and October 2021.

The interviews were performed by two staff members from EuroHealthNet (Senior Policy Coordinator and Research & Policy Officer) with the support of WP4 leader Dr. Marco Silano. The team decided that a semi-structured interview was the best suited methodology for the purpose of this deliverable. This methodology offers a guideline to the interviewer, offering her at the same time a certain degree of liberty to ask follow-up questions, or to ask completely new questions according to what emerges from the experts' answers. At the same time, this format provided the interviewees the ability to express themselves freely and to raise issues that they considered important.

As aforementioned, a list of opening questions was drafted on the five identified dimensions of the food systems policy debate, and from this list, interviewers chose the most pertinent questions to the specific expertise of the interviewed, adapting the text accordingly. Due to the relatively short time – 45 minutes – we decided to select three main questions. An introductory and general one centred on the work currently done by the interviewed, followed by two more specific questions that investigated the connection between the experts' work, and the goal of the WP4.

⁵ A template of the invitation letter is available at the end of the document in the Annex B. After this first invitation, the team also sent reminders to the experts from which we had not received a reply, and these reminders have proved to be beneficial, since we arranged to schedule some of the interviews only following this reminder.



Interview integration for milestone 4.2

In a second phase of the project that lasted from February 2022 until the end of March 2022, the same team of researchers from EuroHealthNet with the support of the Italian Institute of Health (ISS) performed four further interviews with the aim to integrate their results into the outcomes of the previous findings. Since the milestone 4.1. interviews (first-round) were analysed to identify remaining conceptual gaps and to evaluate which topics related to JA Best-ReMaP had not yet been sufficiently discussed, these served as a starting point for developing further analytical framework.

The research team decided that the best way to enrich further the outcomes of the first-round interviews was to contact two other pivotal DGs of the European Commission, one representative from a Civil Society organization focused on public health and another Member of the European Parliament (MEP) with expertise on food systems, nutrition, and related policy challenges. In result, four second-round interviews were performed with one expert from the European Commission DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW), one from the DG for Communications Networks, Content and Technology (DG CONNECT), one expert from the European Public Health Alliance (EPHA) and with an MEP from the Greens–European Free Alliance party.

To this end, the research team followed the same methodology as for the first-round of interviews. However, a slight amendment was made in case of interviewing the expert from the EP. Since the second round of interviews fell in the period coinciding with the war in Ukraine and increased EU response to the crisis, including in the food policy field, many of the invited experts faced challenges in finding time to respond and take part in the research. This did not fit well with the deadlines of this milestone, therefore we accepted the offer from one MEP to provide the answers in a written form. To this effect, the team of investigators drafted and sent the questions to the MEP in question, with a request for the response sent back via email. The reply received was well developed and offered useful insights, proving that the MEP put a lot of effort to respond to all our questions to their best knowledge. Therefore, we considered this interview as if it had been performed in person, and we integrated it with the others.



Outcomes of the interviews

Even though experts had diverse backgrounds, different views and worked on different areas, common topics emerged in most of the interviews, thus underlining the similarities of the challenges faced at the EU level in terms of policy integration and sustainability. Among the inputs received in the interviews, we found six key points that well summarise the main challenges Best-ReMaP Joint Action ought to address to grant the sustainability of its outcomes.

Differences across EU countries

Experts pointed out that there is a tension between Union level policies and Member states. Final policy decisions are often taken by Member States, therefore a popular opinion was that the **EU can only act as a controller, consultant, or supervisor**, which makes it difficult to implement a comprehensive approach throughout the European Union. For example, talking about the 'EU school fruit, vegetables, and milk scheme', one expert mentioned that adopting a comprehensive approach regarding vending machines and school meals would help render healthier environments across schools in the EU. However, this programme does not have competences in that regard, so it cannot intervene on types of products that the vending machines can sell. They can only offer a list of the eligible products, but it is up to the national or regional level to take decisions or to regulate this framework. Furthermore, similar issues were mentioned by other parts of the European Commission.

Experts from DG GROW explained that at the beginning of the development of the ["EU Code of Conduct on Responsible Food Business and Marketing Practices"](#) – which is a code of conduct that encompasses monitoring and reporting mechanisms that consent to evaluate the progress made in more than one area, and by actors at different level of the food chain - representatives of the EU Member States were supposed to be part of its creation process, but eventually they were not involved because it was too complicated to find a common agreement between all interests involved.

However, experts pointed out that a lack of integration between Union and national policies may limit not only the regulation process, but also the learning from the so called 'best practices' occurring at the local level. As suggested by experts from civil society organizations, a way to achieve a better integration could required revising the "best practices" approach adopted by EU institutions. Too often this mechanism has led to practices where the EC

indicates a set of best practices, but then does not support MSs in the implementation in their national context. Therefore, if we provided MSs a legislative framework at the EU level, it could be much easier for countries to implement these best practices, and it could also help the learning process on how to avoid “bad practices”. That is, it is necessary to understand in more detail not only which are the best practices, but also what are the bad policies that have worsened food system and that are thus to avoid in the future.

According to MEP Sarah Wiener from the Group of the Greens/European Free Alliance, this could be one of the strength points of the “Farm to Fork Strategy”, since this strategy does not rely only on individual policies, but it aims to look at the whole food production system, and thus adopts a holistic approach that has been missing so far in EU policy. To do so, it will however need to be accompanied by other strategies and initiatives, such as the [EU biodiversity strategy for 2030](#) and the initiatives that will follow from it, as well as other Green Deal policies, particularly the [Fit For 55 Package](#).

At the same time, MEP Wiener specified that the biggest weakness so far of the “Farm to Fork Strategy” is that it is not legally binding. While it announces many legislative initiatives, it thus remains difficult to consider the value of the Farm to Fork Strategy overall as long as its implementation in terms of legislation is still pending. In addition, a glaring flaw is also that the Farm to Fork Strategy was not immediately integrated into the new Common Agricultural Policy of the EU and, therefore, its sustainability objectives are not legally binding for the implementation of this large part of the EU budget for the next seven years.

Several experts thus mentioned the need for an increased focus on integration at the EU level, but they also specified **that this need has yet to be balanced with the fact that Member States start from vastly different economic, social, and cultural backgrounds**, and they thus may have quite different means and needs. For example, DG Agriculture stressed that in terms of organic production, their programme must deal with significant differences at national level, as proven by the fact that while only 0,5% of food production is organic in Malta, this is already above 25% in Austria. Similarly, the efficiency of the code of conduct included in the AVMSD developed by DG CONNECT varies significantly across MSs, since these codes have to be adapted to the regulatory schemes already in place in the countries.

This is a significant issue from a policy perspective, since it entails that the actions implementable in one country are not necessarily feasible in neighbouring ones. On the contrary, each state has its unique situation, so it is not always possible – and above all

preferable - to implement a “one size fits all” policy across European countries. This was described by EFSA regarding the collection of food consumption data in EU Member States. They mentioned the difficulty of harmonizing this data, since countries were using diverse methodologies that were difficult to compare, and EFSA did not have the funding necessary to develop a unique dietary survey.

Inadequate funding is often mentioned as the main barrier to the implementation of EU projects encouraging member states to adopt common, comparable, tools and approaches, but experts stressed that it is also necessary to consider differences in competencies and traditions at member state level. An important detail added by EFSA was that harmonizing methodologies at the EU level is complex not only because some countries need more support than others, but also due to the resistance to change from those countries that feel they have well developed and functioning systems in play, and they thus do not want to replace a methodology that has proven to be successful. Hence, when trying to harmonize tools and methodologies across Member States, policymakers should be aware that national institutions may be resistant to external impositions, since they want to preserve their own approaches, and to stay in charge in their own country.

In sum, the policy challenge concerns finding a harmonized balance between the need to develop holistic policies at the Union level and the need to respect (sub-) national methodologies, expertise and sovereignty. Otherwise, if EU policies were to be imposed on Member states in a top-down manner, they would face significant resistance because it would seem that EU institutions are trying to impose on Member States in areas in which they do not have the competence to do so.

Therefore, the interviewees indicated that the most efficient policy strategies point towards a **development of national plans according to Union directives, where Member states develop their own plans that set out how they plan to achieve a common set of objectives set out at EU level, in order to access EU support or funding.** In this way, for each target of a selected European strategy, Member states would set out their national ambitions, and specify how they plan to reach them, as in the European Green Deal. This is an important aspects for the Joint Action Best-ReMaP, since some experts stressed that together with the need to network at EU higher levels, this Joint Action needs to promote its outcomes by implementing a bottom-up approach at regional level that involves and empowers local stakeholders.



Food systems and individual behavior

Experts also underlined the importance of enhancing a multi-sectoral approach to avoid implementing fragmented actions, since all actors in the food chain must work well together if we are to deliver co-benefits to the whole community. The problem is that ministries at national level are not cooperating effectively, especially regarding advertising and public procurement policies, and health authorities are not yet sufficiently involved in the regulation of these sectors. In this way, health consequences of certain policies may be neglected, since ministries other than health may not prioritize citizens' health in their actions. In this regard, **upstream actions rather than top-down policies would once more adapt better to the people's needs**, since it is difficult to retrofit or to change the latter once policymakers have decided how to implement them.

In the policy fields covered by Best-ReMaP WP4, focusing on a multidisciplinary approach implies working on food environments, namely at the point of contact where citizens make their decisions on what they consume. Understanding the context in which citizens make decisions about food is essential to understanding the choices they make, so **a multi-sectoral and multi-actor approach is necessary to grasp all the factors that influence individual behaviour**. According to DG SANTE, this is an aspect on which literature has improved over the last few years, proving that the narrative of freedom of choice is deeply flawed. Evidence is now clear on the fact that individual decisions are highly influenced by our social environment, and the fact that companies invest lots of resources in marketing is an example of this.

This topic is yet contentious, especially at the political level, as well demonstrated by the very diverse answers provided by the MEPs interviewed. On the one side, Herbert Dorfmann – Member of the European Parliament for the European People's Party from Italy - stressed that **we cannot focus only on external factors**, since we must also acknowledge that consumers' decisions play a significant part in determining the food system framework. Consumers take daily decisions when they purchase food in the supermarket, so they are not 'responsibility free', but it is also up to them to take the healthy choices over the unhealthy ones, thus influencing the food chain towards healthier and more sustainable actions.

According to this MEP, policies such as the 'Farm to Fork strategy' are then too narrowly focused on farming, while they neglect the consumer side of the food chain. Focusing on the latter entails giving priority to information and consumer education rather than regulating the

food environment, since this view holds that a lot of the information that is currently available about what is 'healthy' and sustainable is misleading or wrong. For example, Dorfmann stressed that certain food groups such as fats or sugars are not unhealthy *per se*, but they become so if assumed in excessive quantity.

Rather than 'demonizing' certain food groups, Dorfmann thus argued that it is more important that consumers are both educated about the right balance necessary for a healthy diet, and are not swayed by misleading information, as it is too often the case in current food labelling systems, as in some countries' 'Nutriscore'. That is, in his opinion 'Nutriscore label' is still too influenced by the food industry, and thus needs to be reviewed to focus more on citizens' health. For the same reason, this MEP believes that a regulation on advertisement is necessary for children, but not for adults. That is, while other interviewed preferred a holistic view on food systems with a specific control on the inputs *all* consumers receive, according to Dorfmann this should be the case for children, especially in light of the high amount of time they spend on digital platforms, but adults should be able to decide for themselves.

On the other side, MEP Wiener maintained that **a limit should be put on the reformulation of processed food, since these products are *inherently* detrimental to health**. Citizens should thus be encouraged and enabled to rely less on processed products and more awareness should be raised on the generally detrimental effects of these foods on our health (e.g. association with higher risks of obesity, heart disease, diabetes etc.). In this way, we could both change consumer behaviour towards more natural and fresh foods, and focusing on reformulation we could reduce the amount of (artificial) food additives that are routinely added to food.

This view is shared by DG SANTE, for which a good monitoring reformulation system is an example of how these different views could be balanced. If we find a way to clearly describe to every consumer the content of the food they buy, this will give them the information they need to make the healthier choice. There is nowadays more awareness among the consumers compared to the past, but many would still be surprised if they had a clearer understanding of the composition of some of the products they buy, as for example the percentage of sugar contained in several breakfast cereals. Hence, the debate should be about how we can enable consumers to make the 'easy choice', and food labels are often at the centre of this debate.

Citizens may find it confusing to deal with various kinds of labels, therefore moving towards this action ought to be compatible and coherent with other activities in the food policy



environment, in order to frame a system that is clear, common (European), easy to understand, public, and that is not misleading. Therefore, experts suggested that if JA Best-ReMaP wants to foster the sustainability of its results, it to focus on cooperating with NGOs, academia, and EU bodies to increase awareness and control on food environments. In this way, this JA can enhance a healthier framework where consumers will still have the choice options, but it will be much easier than it currently is to take the healthy decision. .

Research support to policymaking

Investment in research is essential to enable data-driven policies, but at the same time experts stressed that there is a long-term issue to resolve for research to integrate at best policy making. As stressed by DG Research & Innovation, **research does a lot while funding is in place, but it stops being efficient when funding ends**. There is thus the need to develop better investments plans for research, making sure that projects focus more on what occurs after they end. All research initiatives should take this into account as of their inception, and this emphasises that Best-ReMaP too should consider from the outset its long-term goals and financial sustainability.

According to experts interviewed, research is needed to clarify several policy problems. First, a lack of consensus around theoretical or conceptual issues can thwart efforts to develop policies to regulate food systems, like those that are the focus of Best-ReMaP. This problem is well represented by the conundrum concerning what “healthy” means. This is a complicated matter of debate because **there is not a single answer, but there are differences in diet both at national and at individual level**. Moreover, citizens have different lifestyles and different caloric consumption, so there could be objections to limitations on certain foods - such as HFSS (high fat, sugar, salt) foods – on the basis that elevated levels of physical activity and an active lifestyle could counteract the negative effects of these food groups.

The difficulty in precisely defining the thresholds above which certain foods are “unhealthy”, and the situations in which they can be considered as such are thus slowing down food regulation. This entails that we need more research not only to develop clear guidelines according to the different national and local level, but also to have a clearer framework of the food environments we ought to regulate. For example, a clear and precise definition is one of the strength points of the organic label. Not only is this label clear to the consumer, but the fact



that there are precise criteria to define what organic is, permits the development of a precise set of rules, legislation, and control.

Second, legislation on food policies faces a “developing battle”, since it occurs in a framework where new information constantly changes the context policymakers are trying to regulate. It is **necessary to find a balance between having legislation in as well as the flexibility to adapt this to new research**, developments in different national contexts, and to the fast-changing markets. This concerns not only the ‘items’ to regulate, but also regulators themselves, since individuals working in the various DGs are often changing, with new people that may not have the connections that their predecessors had. A better coordination among DGs and between DGs and external bodies would render policy implementation much more effective.

Finally, interviewed stressed that research and policy outcomes from the JA Best-ReMaP can enhance Member States’ capability to adapt and to replicate previous projects in new contexts. Ideally, the main objective of this JA should thus be **to contribute to the implementation of at least one new policy in at least one of the Member states involved in the JA for each of the three main work packages**. Instead, if at the end of the project Best-ReMaP produces only a set of recommendations, it cannot be considered a success. This is important because if countries see that initiatives were successful in some other constituencies, then they are more willing to start a similar programme on their own. On top of that, if countries are provided both the connections to learn from the experiences of those who implemented the project beforehand, and the resources and support from the EU resources – such as Best-ReMaP offers - then they are more likely to succeed.

Connection between public and private sector

Interviewed indicated that Best-ReMaP must consider that there are many legitimate interests involved in food systems - from public health, to industries, NGOs, etc. – that are difficult to harmonize. This could create some problems because when people from vastly diverse backgrounds are involved in the same project, they may just focus on finding a minimum common denominator, responsibilities may become diluted, and actors may not focus on finding the most ambitious approach for the project. This is true for all sectors, but it is particularly evident when we discuss the best way to balance public goals and private sector interests. On this issue, participants to the interviews had different opinions.

On the one hand, some experts stressed the importance of **discussing solutions together with the private sector** to obtain concrete commitments from industries in terms of increasing production, accessibility, and affordability of ‘sustainable’ products. Overall, this view is based on the idea that the private sector will be more likely to adapt to the sustainability standards if this is likely to (economically) benefit them as well. This is the view that structured the self-regulatory approach of the aforementioned ‘EU Code of Conduct on Responsible Food Business’ adopted by DG GROW.

As a first step to provide businesses the opportunity to sign up for the objectives that they had internalized, DG GROW relied on a broad co-creation process to form and sustain a common understanding of the challenge and solutions needed. This process was meant as an opportunity for businesses to display a certain level of ambition and also that it is possible to speed up the sustainability transition on the basis of a common path. Hence, according to DG GROW a voluntary approach was the best solution to bring the food industry and farmers closer together in an objective to move towards more sustainable practices, and to balance the different levels of awareness from companies and citizens regarding sustainability. Furthermore, companies were incentivized to commit to the code of conduct because they realised that if they fail to progress towards the Farm to Fork objectives, then there would be further (regulatory) actions from the European Commission.

On the other hand, other experts **were more concerned about the risks that would result from an even greater involvement of the private sector** in food system regulation as compared to today. For example, EFSA does not involve the private sector in the collection of data, since this could bias the outcomes and in data survey, and there is also a problematic connection between money invested in a certain project and the availability of outcomes. Survey research is expensive, so if one organisation spends money on data collection, then it might not be willing to make data available to everyone for free before fully exploiting such data. As mentioned by EFSA: “The idea itself that someone spends a lot of money to then make it available to everyone, is perfect in the ideal, but then in the real world, if everyone acted as a free rider, then we would have no one collecting data”. Therefore, public investment is to be preferred because the more data comes from public money, the easier it is to render it available to everyone afterward, and public money can be more easily steered towards public goals such as healthy diets.



Other interviewed also stressed that industries' primary goal is to sell their products to make profits, and not to promote citizens' health. If we left too much power in the hands of food producers, as according to MEP Dorfmann it is currently happening with the 'Nutriscore' labelling, it would then be difficult to obtain proper regulations. To be successful in the regulation of food systems, a code of conduct as the one mentioned in the 'Farm to Fork strategy' may thus not be sufficient. On the contrary, legal actions, clear regulations, and public investment may favour the creation of a healthier food environment.

This criticism was shared by MEP Wiener, for whom voluntary approaches are never enough to achieve ambitious targets: they may lead to minor improvements, but they cannot be enough to produce real behaviour or system change. This is because voluntary approaches are by necessity constrained by existing external circumstances, namely the fact that the logic of the market and the need of companies to make a profit and keep growing economically ultimately means that ethical values have to fall by the wayside.

Finally, this scepticism towards the self-regulatory nature of the code of conduct was evident also in the responses given from civil society organisations. In their opinion, it should be pointed out more clearly that **scientific evidence clearly shows that self-regulatory approaches could at best be a complementary approach, and they should never be seen as something to be used instead of regulation**. In this regard, if we leave the regulation of the food environment primarily to self-regulatory schemes as the ones used in the code of conduct, there risk is that we could be going back to the same position we were on ten years ago, thus losing an opportunity to improve food system sustainability. Therefore, not only NGOs, but also institutional projects such as the JA Best-ReMaP should point out more clearly the need to have legislative regulatory measures.

Health inequalities

As pointed out by the European Public Health Alliance, questions on social fairness are integral to sustainability, so you cannot have the latter without addressing the former. This view was shared by most experts, with many stressing that both EU institutions and Member states will have to continue working on the area of 'non communicable diseases', since these represent almost 80% of the burden in terms of illnesses and money spent, and most of them can be prevented if we improved the people's lifestyles and nutrition.



Best-ReMaP thus ought to focus on integrating its results into the national action against NCD, and it should centre on social equity, since food environments must not become two-tier systems where vulnerable groups are left behind. Food systems must therefore focus not only on health and sustainability, but also on ***inclusiveness***, namely on making sure that **‘healthy food environments’ are accessible and available to all citizens regardless their ‘means or resources’ to do so**. Social and health inequalities of today’s food system are thus closely intertwined, as well underlined by the aspect of price and the fact that those foods that are healthy - fresh vegetables and fruits that are ideally organically grown, meals that are cooked/prepared at home and not industrially produced, etc. - often cost more time and/or money than industrially produced ‘convenience foods’.

A solution proposed by MEP Wiener to the ‘price issue’ is to give a “truer” price for foodstuffs. That is, the prices of food on our supermarket shelves should incorporate the costs that are currently externalised, such as the health care costs caused by unhealthy nutrition or also environmental damages caused by food production.⁶ One way to achieve this could be flexible taxation on foodstuffs: healthy foods could incur a 0% VAT, while those classified as unhealthy can be taxed at a higher rate. This element was already taken up in the [Farm to Fork INI Report of the Parliament](#), because if a Member State wishes to apply such flexibility in taxation, it must be in conformity with EU rules for the Single Market.

At the same time, concerns over health equity are an integral part of all JA Best-ReMaP core topics. First, food reformulation can help significantly reducing health inequalities, especially if it targets the HFSS foods supply, since often the consumption of these foods is disproportionately present in the lower socio-economic groups. Second, public procurement policies have the potential to lead to highly beneficial – and inclusive - outcomes, since meals in public institutions – especially for children in schools – are often the only opportunity to access healthy foods for certain disadvantaged populations. This is not only a question of access to healthy nutrition, but also of education since public procurement is a powerful means to educate citizens about the importance of healthy and sustainable diets, and also of animal welfare standards and on the urgent need to reduce food waste.

For this reason, MEP Wiener stressed that we need to start at the earliest possible time to integrate awareness about nutrition, natural flavour, cooking and preparing meals and the enjoyment of healthful food as part of public education. In this way, we would also be able to

⁶ For example of meat, which has very high externalised costs for effects such as nitrate pollution of ground water, GHG emissions, Land Use Change effects



even out some of the social inequalities, since it is during this period of life that many of our preferences for food are also shaped. In this regard, the EU work on [greening the public procurement policies](#) offers a promising opportunity to leverage sustainability, inclusion, and healthiness of EU food systems.

Third, some experts stressed that targeting marketing would clearly reduce health inequalities, since individuals from lower socio-economic groups – especially children – are more affected by advertisement of unhealthy foods than others. Hence, we need to discern more precisely ‘for whom’ certain policies may be damaging, since different values and political views create divergencies in what is deemed ‘bad advertisement’ and who suffers more the consequences of certain political decisions.

According to DG AGRI, the importance of considering health inequalities is well represented on two sides by the challenges faced by organic products. On the one hand, there is the need to make sure that organic products become more and more the mainstreamed, as is the case in the Scandinavian model, rather than a niche product that only higher classes can afford. On the other hand, this control on prices must be balanced with the need to make sure that there is sufficient income for farmers. In this regard, organic farming enables rural and peri-urban areas to create wider local benefits, thus proving that there is a way to create a coherent package of policies that are simultaneously socially responsible and provide wider benefits to all social groups.

DG SANTE stressed instead that to ensure the sustainability of Best-ReMaP outcomes, there is the **need to promote the importance of the connection between the social gradient and NCDs also amongst those that have so far neglected this aspect**. That is, while agencies promoting environmental awareness have been effective in increasing the awareness of the risks of climate change, those involved in food systems have not managed to be as successful. For this reason, Best-ReMaP should also try to exit the ‘bubble’ of those supporting and promoting healthy food systems to engage in a dialogue with those MPs, industries and people that have neglected or opposed measures aimed at tackling health inequalities in this framework. In other words, results of this JA should reach not only those actors already convinced about the importance of Best-ReMaP motto “Healthy food for a healthy future”, but they should also try to engage with those industries and politicians who have so far neglected the importance.

Some experts criticized the “Farm to Fork strategy” ability to reflect this social justice aspect, and they pointed out that this strategy should be better coordinated and integrated with the European Pillar of Social Rights (EPSR). That is, as long as around 8% of Europeans cannot afford a healthy and nutritious meal every second day,⁷ food systems cannot be considered sustainable. A better coordination between the “Farm to Fork Strategy” and the EPSR could be achieved by including indicators in the EPSR social scoreboard to better monitor how food systems sustainability is contributing to the reduction of health inequalities.

This is of particular importance considering recent events (as of April 2022) in Ukraine, the neighbouring countries and the whole of the EU in effect. There are additional difficulties now related to food security and the economic sustainability of the food chain, but some experts underlined the necessity not to abandon the sustainability commitments of the food system due to these unfortunate events. Rather than being something to sacrifice short-term to deal with the immediate repercussions of the war in Ukraine, medium- and long-term objectives should be augmented for – such as that improving food systems sustainability is not a burden, causing increase in food prices and a risk for food security in Europe but that ‘greener’ food systems mean healthier, socially-just and resilient populations, systems better equipped to respond to the climate crisis.

The digital challenge

Final aspect addressed by interviewees concerned the advertisement challenge, especially related to digital platforms. DG CONNECT role in this regard is pivotal, as proven by their “[Audiovisual Media Service Directive](#)” (AVMSD), which has been recently updated to reinforce the already existing provisions with extension to video sharing, social media platforms. In particular, in response to children’s particular vulnerability and a large blogging-content consumer group, the European Regulators Group for AVMS (ERGA) attempted to [identify blogging-like types of services](#) and their role in the expanding online advertising market.

These new platforms prove that the **advertisement market is constantly changing**, so regulators must be agile and flexible to consider the changes and challenges in media platforms if they are to protect the health of consumers, especially that of children and teenagers. Hence, Determining when these platforms fall under the obligation of the AVMSD

⁷ <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/ddn-20220225-1>



has been one of DG CONNECT main focuses over the last few years, therefore the revision in the directive aimed at issuing guidelines on those aspects that had been neglected so far.

To this end, this AVMSD directive provides a code of conduct⁸ that according to DG CONNECT encourages Member States to collaborate with AVMS providers to co-develop and implement initiatives to reduce the exposure of minors to AVMSD communications related to HFSS foods and alcoholic beverages. In their opinion, this code of conduct manages to do so because it sets out clearly and not ambiguously the objectives, it provides guidelines for monitoring and evaluation, including the achievement of the objectives the code aimed to, and it provides for effective reinforcement even through, if it is the case and if there are breaches of the rules, proportional sanctions.

However, this voluntary nature of the code of conduct was criticised by other interviewees who mentioned that **this code does not protect children from advertising of unhealthy food, nor has it changed the fact that foods that are specifically marketed to and produced for children are very often actually more unhealthy than products marketed to adults** (e.g. they often have a higher sugar content). For this reason, MEP Wiener stressed that even though there already seems to be considerable momentum within NGOs, it would seem that the issue of food marketing – especially to children - has not yet broken through to the Commission or parliamentary level, so that more work on awareness raising may be needed.⁹

According to some interviewees, especially those from civil society organizations, the fact that DG CONNECT is mainly dealing with marketing regulation is part of the reason why we still have not had sufficient improvements, since this entails that health protection in marketing related issue from the European Commission is too weak. For this reason, some argue that it is critical to put this issue back to DG SANTE, since in this way health consideration will be better taken into consideration in the regulatory framework of marketing.

Even though DG CONNECT did not agree with this criticisms, they admitted that there is the need for an increased involvement by DG SANTE in food marketing regulation, since DG CONNECT specified that their task is to control the medium of the message, and not to

⁸ Note that this is not the same code of conduct developed by DG GROW.

⁹ For example, MEP Wiener mentioned that in Germany, the new government has made it part of its programme to restrict advertising to children, so this will certainly be an interesting legislative process to follow, which might also serve to inspire action at EU level.



determine what constitutes or not an unhealthy food, a responsibility and accountability that they stressed needs to be delegated to DG SANTE instead.



ANNEX A: List of Questions for the Best-ReMaP Interviews

1. LEGISLATIVE CHALLENGES

- a. **Past Vs Future:** Over the last decade, the EU has implemented several regulations in the food chain framework, yet without achieving the results expected.
 - I. Question: “Which, in your opinion, is the main problem/obstacle EU policies have faced over the last decade concerning the regulation of food systems?”
 - II. Follow-up: how can we overcome past hindrances in order to better regulate EU food system?”.
- b. **Self-regulatory debate:** industries have promoted their self-regulation over the last few years, while WHO stressed that this has created several problems, since it includes less ambitious thresholds than what’s recommended by science and it leads to little or no punitive actions.
 - I. **Question:** “How can EU institutions work to balance control/incentives for industries at the national level in order to have them on board rather than against healthier food policies?”
- c. **Centrality of the EU**
 - I. **Question:** “What’s the interplay between EU and MS policy/funds/legal level? Are national frameworks supportive or counterproductive to the implementation of EU policies?”
- d. **EU tools and instruments:** there are several EU processes that can be useful to advance the sustainability of BestReMap findings at strategic as well as practice levels such as the European Semester, EU cancer plan, Farm to Fork, the Technical Support Instrument, the EU Child Guarantee and national action plans, the Recovery and Resilience Funds and plans per country etc.
 - I. **Question:** “Which tools and instruments holds most potential for sustainable BestReMap outcomes at strategic and practice levels, and why?”

2. SOCIAL FAIRNESS AND HI

- a. **Social fairness and HI:** one of the experts mentioned that JA can be sustainable only as long as it is socially fair.

- I. **Question:** How do you think concerns related to health equity impact on how sustainable a given food policy option will be?
- b. **Covid-19 pandemic:** the pandemic has affected HI in several ways throughout Europe. In many countries we have seen an increase of unhealthy behaviours (related to food, tobacco, alcohol, etc.) in vulnerable subgroups.
 - I. **Question:** “Which problems do you think this pandemic has highlighted that must be considered to improve our societies’ preparedness for future crises?”
 - II. **Follow-up:** What role do you envisage for EU institutions in this regard?

3. FOOD AND ADVERTISEMENT

- a. **AVSMD and Health:** the former may be difficult to connect with the latter in Member States, since health ministries are not in charge of AVSMD.
 - I. **Question:** “How do you think we could better connect AVSMD and health to make sure that the latter is included in MSs advertisement policies?”
 - II. **Follow-up:** What role could the EU have to enhance cross-border control?
- b. **Digital platform:** policies are still focusing too narrowly on television, whereas citizens – children in particular - are consuming various platforms. In terms of sustainability, it is thus necessary to understand which platforms we ought to target specifically.
 - I. **Question:** “Which platforms do you think should be included in advertisement policies (Out-of-home (OOH) foods, social media, digital marketing (influencers, etc.)?”
- c. **Nutritional Profile Model:** JA focuses on finding precise EU Nutritional Profile Models (NPM), since this would help giving clear indications to MSs (especially in WP6) => the clearer, the easier to follow.
 - I. **Question:** “how can we obtain a clear and uniform ‘Nutritional Profile Model Across Europe?”.
 - II. **Follow-up 1:** “Do you think it is mostly a matter of adopting the WHO NPM model or are there further challenges that ought to be addressed?”
 - III. **Follow-up 2:** “Do you think the nutritional label on products (A,B,C,D,E) is a positive step forward? Can it also be applied to regulate marketing products?”

4. **SUSTAINABLE AND GREEN:** the climate challenge is a crucial political challenge, and food production/consumption has a significant carbon footprint.

a. **Question:** "Which steps forward could be made at EU levels related to HFSS food in order to better address the environmental challenge?"

l. **Follow up:** "is there potential for an EU harmonized framework for action on green and healthy food procurements in public setting?"

b. **Sustainability question:** "Do you think there is a tendency for companies to be willing to sacrifice some profit to help address these issues (by e.g., curbing advertising to children or reformulating foods), or will they only take those actions if this enables them to maintain or exceed current profit margins (and/or if coerced by legislation)?"

5. **RESEARCH AND LITERATURE:** data-based action is essential to structure policies.

a. **Question:** "Is the state of evidence sufficiently clear to frame precise policies?"

l. **Follow-up:** "Which gaps are there, and where should we invest to fill these gaps?"

6. **PUBLIC PROCUREMENT**

a. **Exemption implementation:** "To support local food production in Slovenia an exemption for public food procurement was applied (an exemption means that 20 % of purchased food is excluded from the public food procurement). In which way do you think the exemption could be introduced/used in other countries?"

b. **Criteria for selection of public contract:** "How to encourage the use of environmentally focused sustainability criteria as the main factor for the selection of public contract?"

c. **Tackling inequalities:** "What policy solutions in the field of public food procurement could further increase equity by reaching vulnerable groups with healthy food?"



ANNEX B: Template Invitation email letter to Best-ReMaP experts

Dear [name of Expert],

I hope my e-mail finds you well.

I am contacting you on behalf of the Joint Action Healthy Food for a Healthy Future – Best-ReMaP (2020-2023), funded by the European Union’s Health Programme, and implemented by 36 partners in 24 EU Member States.

This Joint Action, delivered via collaborative work of seven pan-European teams, aims to contribute to an improved quality of food supplied to European citizens by facilitating the exchange and testing of good practices concerning: (1) the monitoring and analysis of how the food that people consume changes at the European and national level; (2) the regulations on the marketing of food and beverages to children; and finally (3) the procurement of food by public bodies for educational institutions, social care facilities, etc.

As a leader of the Best-ReMaP’s Work Package 4, the Italian National Institute of Health (ISS), with support from EuroHealthNet – the European Partnership for improving health, equity and wellbeing, are responsible for transfer and integration of the results of the Joint Action into EU and national policies in the food and nutrition fields. In contribution to this effort, we still need to carry out an investigation into what actions and factors make initiatives sustainable and likely to succeed. We have identified a number of key EU policies and distinguished European experts – such as yourself – who we would like to carry this investigation with. We strongly believe your expertise and knowledge in the field will offer pivotal insights into furthering the work of this Joint Action.

Therefore, we would be very pleased if you accepted to participate in a 30-minute-online interview. In the interview, we would like to focus on X (policy area of the question), with a couple of more specific question centred on Y (what the specific questions are about, but without being too detailed so as to leave some range of action to the interviewer). After – hopefully - hearing back on your willingness to participate, we will follow up in proposing and selecting the most suitable day and time. The interviews will be conducted *date indication* (during the month of October 2021).



Should you need any further details, please do let us know. We look forward to your affirmative response.

Yours sincerely,

On behalf of the Joint Action Best-ReMap, the Work Package 4 and Marco Silano (ISS),

Signature of the Policy Officer.