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A 'Common Food Policy' for Europe: How governance reforms can spark a shift to healthy diets and sustainable food systems

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ABSTRACT

More than half of adults in the European Union (EU) are now either overweight or obese (53%). Non-communicable diseases (NCDs), many of which are diet-related, account for 70% of mortality in Europe and a growing share of healthcare costs. While eating habits have an important role to play in NCD prevention, consumption patterns across the EU are diverging significantly from recommended diets. There is growing consensus on the solution: a series of coordinated and wide-ranging policy interventions to build healthy 'food environments'.

This article argues that EU governance structures remain ill-adapted to the systemic nature of this and other challenges in food systems (e.g. climate change, biodiversity loss, food poverty): conflicting objectives and missed synergies are identified between different policy areas (agriculture, trade, health, environment, etc.) and between different levels of governance (EU, national, local). An integrated food policy framework – a 'Common Food Policy' – is therefore required to meet the EU's public health and sustainability objectives. It identifies four distinct aspects of the governance shift required to promote healthy diets and build sustainable food systems in Europe: (i) coherence across policy areas; (ii) coherence across governance levels; (iii) governance for transition; and (iv) food democracy. Blueprints for a Common Food Policy are already emerging, and are ripe for consideration, development, and implementation by the European institutions.

1. Introduction. Unhealthy diets: an emerging crisis revealing the cracks in EU governance

The spread of unhealthy diets, obesity, and non-communicable diseases (NCDs) in Europe has become too big to ignore (WHO, 2018a; EHN, 2017). Over 50% of the European population is overweight and more than 20% is obese (WHO, 2018b). Unhealthy diet is the leading risk factor for all healthy life years lost in Europe (IHME, 2016). Poor diets are responsible for 49% of the burden of cardiovascular disease, which remains the leading cause of death in the European Union (EU) (EHN, 2017). Obesity has been identified as the primary cause in 80% of type 2 diabetes cases in the EU, 55% of hypertensive diseases in adults, and 35% of heart disease (Brandt and Erixon, 2013). Poorer population groups are particularly at risk: those experiencing economic hardship tend to replace healthy items with cheaper convenience foods (Solidaris, 2017; Hébel, 2008). In 2016, 23.5% of EU citizens were at risk of poverty or social exclusion (Eurostat, 2019) with inequality growing across Europe (OECD, 2017) and outright food insecurity having risen in the wake of the 2008 economic crisis (Davis and Geiger, 2017).

The economic costs of unhealthy diets are equally significant. Globally, obesity has roughly the same economic impact as smoking (about $2 trillion or 2.8% of global GDP), or the combined costs of armed violence, war, and terrorism (McKinsey Global Institute, 2014). In the EU, NCDs – often linked to obesity and unhealthy diets – are estimated to cost €700 billion annually, representing 70–80% of healthcare spending by Member States (Seychell, 2016). An obese patient costs EU countries 12–25% more than a patient within their healthy weight range at any given age (Cecchini, 2015; Brandt and Erixon, 2013). The spread of unhealthy diets therefore casts doubt on the ability of the EU to protect and promote the health of its citizens – a commitment enshrined in EU treaties (see Section 2).

The urgency of action is clear. And there is broad consensus on the basic dietary patterns that increase/reduce the risk of obesity and NCDs: the World Health Organization (WHO) has defined healthy diets as diets that are based on nutrient-rich foods, such as vegetables, fruits, whole grains, pulses (beans), nuts and seeds, with limited intake of fats, free sugars, and salt (see WHO, 2018a). The WHO European Food and

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Nutrition Action Plan 2015–2020 further calls for only limited consumption of energy-dense, micronutrient-poor foods and beverages, i.e. those "high in energy, saturated fats, trans fats, sugar, or salt" – often referred to as HFSS foods. Recommendations for 'sustainable diets' are also broadly aligned with healthy diets as outlined above (Garnett et al., 2015). 22 EU Member States are currently below the average fruit and vegetable intake recommended by the WHO (at least 400 g daily), with poorer households tending to be far below this threshold (EPHA, 2016). Average meat and dairy consumption remains above recommended levels (EHN, 2017).

There is also broad consensus that more can and must be done to make the healthy and sustainable choice the easiest one for European consumers (BEUC, 2015; WRR, 2015; European Economic and Social Committee, 2017; EHN, 2017) – an imperative now written into the EU Action Plan on Childhood Obesity 2014–2020 (European Commission, 2014). The solutions for improving diets and building healthier 'food environments' (see Section 2) have already been tried and tested in various EU Member States and elsewhere in the world. Frameworks of action and detailed packages of interventions have been developed by the WHO and other authoritative bodies, and widely endorsed.

What, then, is holding back progress on improving diets? What is allowing obesity and its crippling costs to continue rising unchecked? The problem is what the consensus is telling us: that a fundamental overhaul of food systems is required. Targeted actions such as product reformulation, soda taxes, or new labelling schemes will not work in isolation. Reforms must run deeper, must take the shape of comprehensive packages, and must include hitherto uncharted territory for the public health community – including agriculture and trade policies. In other words, the obesity epidemic is revealing the urgent need to align policies across food systems, and the current lack of mechanisms for doing so.

This paper identifies the specific EU governance shortcomings that hold back our ability to improve diets, and more broadly, to build food systems that are socially, environmentally, and economically sustainable. Although we focus here on what can be done to shift to healthy diets, our argument illustrates a broader problem: the same governance shortcomings that hold back progress on diets also undermine efforts to address climate change, halt biodiversity loss, and achieve decent incomes for farmers and food-workers. These challenges all call for a reform of food systems in the EU. They are also inter-connected, and require a holistic approach and deep policy integration in order to be effectively addressed. We therefore make the case for putting a comprehensive food policy framework in place at EU level – a 'Common Food Policy' – in order to build healthy and sustainable food systems.

Following a brief overview of the actions taken to date by the EU, the article identifies four distinct aspects of the governance shift required to promote healthy diets and comprehensively address the other inter-connected challenges in food systems: (i) coherence across policy areas: overcoming the poor coordination and conflicting objectives between different sectoral policies; (ii) coherence across governance levels: building synergies between actions at EU, national, and local levels; (iii) governance for transition: developing adaptive governance frameworks allowing for transition towards a fundamentally different food and farming model; and (iv) food democracy: increasing participation and accountability in the design and implementation of the policies that shape food systems.

The arguments in this paper draw on the findings of a three-year participatory process to co-develop a Common Food Policy vision for the EU led by the International Panel of Experts on Sustainable Food Systems (IPES-Food, 2019), as well as a broad literature review on food systems governance. The article concludes by drawing lessons from IPES-Food's process, and identifying further opportunities to harness the collective intelligence of food systems actors and to advance integrated food policy approaches at EU level.

2. The uncomfortable truth about tackling diets: it requires action across the food system

For decades, the question of healthy diets was seen as a personal one, and the failure to achieve it as a personal failing. Gradually, the focus has shifted onto the social, economic, and environmental factors shaping people's choices – often referred to as 'food environments' (Garnett et al., 2015; Nugent, 2011). This lens draws attention to drivers of healthy/unhealthy diets across the whole food system, and emphasises the public policy imperative to ensure healthy food environments in which healthy options are "widely available, affordably priced, and widely promoted" (Food Foundation, 2013).

For example, the NOURISHING framework developed by the World Cancer Research Fund identifies the need for action in three domains – food environment, food system, and behaviour change communication – given that "the evidence shows that each domain is important in influencing how and what we eat" (WCRF, 2017). The vast majority of policies and actions recommended by the WHO for improving diets or tackling alcohol harm – from marketing restrictions, to financial incentives, labelling, and interventions in schools – are aimed at reshaping food environments, as well as influencing individual behaviour (WHO, 2017).

Furthermore, studies are showing that successful interventions to improve diets are contingent on packaging different steps together, combining private sector initiatives with government oversight, and providing a clear and coherent rationale for the changes being made. For example, reformulation schemes have proven most effective when undertaken in collaboration with public authorities and in response to government pressure and benchmarks (Traill et al., 2012). Similarly, fiscal measures (such as changes in the rates of VAT colloquially referred to as 'soda taxes' or 'fat taxes') must be ambitious, highly coordinated, and accompanied with clear messaging in order to spark sustained behavioural change, shift the balance of relative prices, and avoid 'substitution' – i.e. using money saved on purchasing subsidized healthy foods for increased purchase of unhealthy products (Nnaoaham et al., 2009; Bahl et al., 2003; Thow et al., 2014; Dharmasena and Capps, 2012). Furthermore, meta-studies of health taxes have shown that reinvesting the revenues in the promotion of healthy diets (e.g. via education schemes) helps to make the schemes effective, and easier to defend and maintain in the face of industry lobbying (Wright et al., 2017). It must also be ensured that interventions are developed in a way that meets equity concerns; in other words, measures must be pro-poor, integrated into robust anti-poverty strategies, and developed alongside the social safety nets necessary to effectively tackle poverty and inequality (Osypuk et al., 2014; Thomson et al., 2018).

There is also evidence to suggest that comprehensive action to reshape food environments is becoming politically sellable. Survey data from a range of European countries has shown that support for actions to 'nudge' people towards healthier diets crosses political party lines, and extends from simple steps such as confectionary-free supermarket checkouts to harder nudges like meat-free days in public cafeterias (Junghans et al., 2015; Reisch and Sunstein, 2016).

On paper, the EU's response has been duly ambitious and systemic. Since the entry into force of the Treaty of Amsterdam on 1 May 1999, the EU has committed to ensure "a high level of human health protection […] in the definition and implementation of all Community policies and activities." (European Union, Council of the European Union, 1997). The protection of human health is now referred to as a transversal requirement in Article 9 of the Treaty on the Functioning of the European Union. Ambitious strategies and roadmaps have been adopted at EU and national levels to promote healthy diets, including the 2007 Strategy for Europe on Nutrition, Overweight and Obesity-related health Issues, and the EU Action Plan on Childhood Obesity 2014–2020. In addition, the WHO European Food and Nutrition Action Plan 2015–2020, covering EU Member States and the broader WHO European Region, cites the creation of a 'health enhancing

environment' and inclusive access to affordable, balanced, healthy food among its objectives (WHO, 2014).

However, the discrepancies have only grown between what has been agreed on paper and what is being done in practice. The EU has not shown the political readiness to fundamentally reassess supply-side policies and make diets a key consideration when it comes to reforming the Common Agricultural Policy (CAP) or negotiating Free Trade Agreements (FTAs). And crucially, the governance mechanisms that would be required to make good on commitments to healthy diets – mechanisms allowing us to weigh trade-offs, reconcile different objectives, build comprehensive food system strategies, and combine actions effectively across different governance levels – are simply not there. As a result, EU and national policies continue to send conflicting signals on diets. Whatever progress has been made has been slow, patchy, and piecemeal. In other words, we struggle with improving diets because we struggle with governing food systems in a way that ensures coherence with the professed objectives to promote health and to support sustainable development objectives.

3. Integrated food policies as the route to healthy diets: A governance shift with four components

We argue that a system-wide, whole of government approach is needed to tackle unhealthy diets and the other negative externalities in food systems (e.g. climate change, biodiversity loss, poor working conditions for food- and farm-workers). By building an integrated EU food policy, new objectives could be prioritized, conflicts could be replaced with synergies, and major progress could be made on diets. Below, we identify four distinct aspects of the required governance shift towards integrated food policies: (i) coherence across policy areas; (ii) coherence across governance levels; (iii) governance for transition; and (iv) food democracy. Each of these is essential to building sustainable food systems.

3.1. Coherence across policy areas: from conflicting objectives to well-aligned policies

The first and most essential governance shift is to align objectives and actions across the range of EU policy areas that affect food systems. The policies, processes, and norms which together define the governance of food systems respond to an array of competing forces, from the agri-food export sector and the big economic actors favouring the liberalization of European and global markets to an active civil society increasingly demanding food system sustainability (Clapp, 2016). The policies affecting food systems have developed in *ad hoc* fashion over many years, allowing instruments and objectives to multiply in confusing and inefficient ways (Buckwell et al., 2017). Gaps and inconsistencies between policies appear to be the rule, not the exception, and we lack mechanisms for reconciling the many trade-offs and contradictions between competing policy goals (Candel and Biesbroek, 2018; Jordan and Lenschow, 2010; Kassim et al., 2013).

Examples of contradictions, inconsistencies, and inefficiencies abound both *within* policies (notably the CAP) and *between* the various policies affecting food systems.[1] Thus, while CAP direct payments to farmers (under 'Pillar 1') follow a per-hectare income support logic that rewards large and historically productive farms, CAP Rural Development funding (under 'Pillar 2') is explicitly based on the provision of public goods. As the OECD notes, this raises the "obvious question" of "the extent to which agri-environmental policies are fixing problems created amongst other reasons by agricultural support policies" (OECD, 2003, p.12). To take another example, direct payments under CAP Pillar 1 tend to be 'capitalised' into higher land prices (Swinnen et al., 2013), requiring specific measures to promote access to land and support young farmers elsewhere in the CAP. Meanwhile, EU incentives for biofuel production are exacerbating the difficulties faced by young and small-scale producers in accessing farmland (TNI, FIAN, IGO, and FDCL, 2012; IPES-Food, 2019).

When it comes to the external impacts, the EU has made explicit commitments to policy coherence, i.e. aligning all policies with climate and development goals.[2] However, EU agri-trade policies remain flagrantly at odds with these imperatives. The European Commission expects EU exporters to meet some 30% of the increase in global demand for dairy products over the coming decade (European Commission, 2017b). Similarly, growth in EU beef, pork, and dairy exports is one of the key advantages promised by the European Commission in the recently signed Free Trade Agreement (FTA) with Japan (European Commission, 2018b). The recently-concluded FTA with the MERCOSUR trading bloc is premised on similar pledges to increase trade volumes for items associated with high greenhouse gas (GHG) emissions – in this case, European cars for South American meat – thus directly contradicting the commitments of the EU to reduce its contribution to global warming.

Diets have been a major casualty of incoherent policies at EU level. Despite the adoption of ambitious anti-obesity strategies (see Section 2), actions have generally been pursued only insofar as they can be undertaken without having to rethink core policies affecting the production, distribution, and marketing of foods, and the contradictions between them. For example, EU action has stalled on the marketing of junk food to children, and on regulating the dubious and proliferating health claims made by manufacturers, leading to condemnation from public health organizations and the food industry alike (BEUC et al., 2017). As regards the marketing to children, the EU has primarily relied on voluntary codes of conduct, notably the 'EU pledge',[3] despite minimal impact to date (Jensen and Ronit, 2015). Attempts to crack down on marketing practices are further undermined by poor alignment with the CAP: multi-million euro CAP promotion campaigns continue to be deployed to generate additional demand for dairy products (Teffer, 2014). Indeed, the links between agricultural policies and diets have been consistently downplayed, although they were finally acknowledged by the European Commission in its latest CAP reform proposals, noting that "via its link to food and sometimes also the way food is produced agricultural policies are linked to health policies" (European Commission, 2018a: 2). Meanwhile, the EU legislative framework for addressing food safety – EU Food Law – does not address sustainability or nutrition issues: the General Food Law (Regulation No. 187/2002) protects the European population from being poisoned, but it does nothing to ensure it eats healthily (Galli et al., 2018; see European Parliament and Council, 2002).

The failure to tackle poverty and social exclusion, which continue to undermine access to healthy diets, is further evidence of policy disconnects and missed synergies. The exclusion poor households face is not only economic, but is also geographic, cultural, and psychological (Borch and Kjærnes, 2016); it often takes the form of long, irregular, or late working hours experienced by low-income groups, making it very difficult to choose healthy and fresh foods and cook them at home (Devine et al., 2009; Bohle et al., 2004; Kearney and McElhone, 1999).

[1] An extensive discussion of conflicting objectives and missed synergies across a wide range of EU policy areas is included in IPES-Food (2019).

[2] These commitments have been made in regard to the Sustainable Development Goals, the 2015 Paris Agreement negotiated at the 21st Conference of Parties (COP) to the United Nations Framework Convention on Climate Change, and the EU's pledges on Policy Coherence for Development, as referred to in Art. 208(1) of the Treaty on the Functioning of the European Union.

[3] The 'EU Pledge for responsible marketing of foods and beverages to children' is a voluntary initiative by food and beverage companies to change the way they advertise to children, coming in response to calls made by the EU institutions for the food industry to use commercial communications to support healthy diet and lifestyle choices for children (see http://www.eu-pledge.eu).

The EU's reaction has been one-dimensional. For decades, the main response to food access problems has been to promote mass production of food commodities – notably via the CAP and trade liberalization policies – with a view to providing cheap and abundant calories: cheap food as a substitute to a robust social policy (De Schutter, 2017; Patel and Moore, 2017). The food banks that are proliferating around Europe help to soften the worst impacts of poverty and food insecurity, but do little to address the root causes. The social policies that could address the problem have instead been scaled back. Recent reforms to national welfare and social security systems across the EU (e.g. decreased overall coverage, stricter eligibility criteria) as a result of post-crisis austerity policies have increased the risks to vulnerable groups (Arpe et al., 2015; Davis and Geiger, 2017). Macro-economic policies driven at EU level have accelerated these trends in Greece and other crisis-hit countries (TNI et al., 2018).

In other words, the EU policies affecting food systems are at best poorly-aligned, and at worst highly contradictory: much of the political energy of the EU is spent on seeking to compensate for the impacts of the EU policies themselves. The conflicting objectives and missed synergies described above lead to major and costly inefficiencies – and healthy diets are one of the biggest casualties of this disconnected governance.

3.2. Coherence across governance levels: from the disconnects of subsidiarity to the dynamism of multi-level governance

Building coherence between different levels of governance represents a second crucial aspect of the shift towards effective, integrated food system governance.

Bottom-up 'alternative food system' initiatives, from community supported agriculture schemes to local sourcing for school canteens, are among the most promising steps towards healthy diets and sustainable food systems in Europe. Major environmental benefits can be driven by short supply chains that reduce the need for cold storage, shift to lightweight or reduced packaging, and cut food miles (Mottershead and Schweitzer, 2018; Schweitzer et al., 2018). Such initiatives can also reclaim value and autonomy for small-scale farmers and food businesses, leaving them less reliant on major buyers, processors, and retailers (IPES-Food, 2017b). According to the European Commission, sustainable agriculture can underpin "new rural value chains such as clean energy, the emerging bio-economy, the circular economy, and ecotourism" (European Commission, 2017a), with major potential for jobs and growth. The implications for diets are also positive: short supply chain initiatives and local/sustainable procurement schemes tend to be focused on increasing access to fresh foods, including fruits and vegetables, and building awareness around food (Kneafsey et al., 2013; Bimbo et al., 2015).

However, EU policies are ill-equipped to support these initiatives. Firstly, there is an eligibility and access problem. Local food system initiatives are often too small and diffuse to be eligible for CAP Pillar 1 funding; many are also urban-based and therefore ineligible for Rural Development funding. Where supportive policy frameworks do exist, the opportunities have not been sufficiently communicated (European Commission, 2013). For example, local actors may be unfamiliar with the food safety and hygiene exemptions designed to support small and medium-scale farmers, and the flexibilities for local and sustainable procurement within the regulatory framework for public procurement (De Schutter, 2015: 158–164).

Secondly, there is a prioritization problem. EU Rural Development funding (under the CAP) and Structural Funds (under Cohesion Policy) can be disbursed on the basis of regional plans, and can target short supply chain initiatives. The bottom-up LEADER approach (under Rural Development) offers a channel for supporting alternative food system initiatives and tackling rural development challenges in an integrated way (e.g. building resilient SMEs and creating rural employment, connecting local farmers and public catering facilities, democratizing local decision-making) (European Network for Rural Development, 2012). However, the EU has not thrown its weight behind these initiatives in political or budgetary terms. Supporting territorial and grassroots initiatives remains *à la carte*: it is an under-utilized option on a Rural Development menu that also includes tools to complement core CAP funding and bolster competitiveness in conventional markets (European Parliament, 2018). Indeed, some 30% of Rural Development funding for the 2014–2020 period has been earmarked for physical investments and farm business developments (European Commission, 2016). Similarly, Structural Funds have generally been used in support of local economic development.[4] These tools are yet to translate into coherent regional development strategies that span food and other sectors (e.g. energy, infrastructure, waste, natural resource management), tackle the rural poverty and social exclusion that is driving poor diets, rural decline and out-migration, or explicitly support short supply chains and territorial food initiatives.

The latest CAP reform proposals redouble the commitment on paper to locally-determined regional/rural development strategies and increased policy alignment. Under the new proposals, Member States would be required to draw up CAP Strategic Plans, indicating how they would design interventions under the two pillars in order to meet nine EU-wide economic, environmental, and social objectives, including to promote employment, growth, social inclusion, and local development in rural areas (European Commission, 2018a). Member States are in fact requested to report on the "internal coherence" of the proposed CAP Strategic Plan with other tools. They are not provided, however, with any indication of what will be expected in terms of the degree and breadth of policy integration: in effect, governments are encouraged to achieve at domestic level what the EU-level policies fail to achieve themselves. They are also being asked to do it with less funding, given the planned cuts to the Rural Development and Cohesion budgets.

Thirdly, food system governance is ill-adapted to promote collaboration, practice-sharing, and reflexive learning.[5] A great number of initiatives enabling the transition towards more sustainable food systems have emerged as a result of urban food policies, city-region food strategies, and formal and informal governance collaborations between local and regional authorities, civil society, and the private sector (for instance, through local action groups or food policy councils). It is at these levels that European citizens are proving the most willing and enthusiastic to get involved in policy-making processes (Moragues-Faus and Morgan, 2015). Though a growing number of opportunities exist for local and regional actors to share best practices with one another (De Cunto et al., 2017), far fewer are created for EU policy-makers to learn from them and shape EU-level policies and programmes to further support these initiatives on the ground; EU institutions have neither the reflex nor the formal mechanisms in place to learn from these experiments and harness the energy of alternative food systems.

Indeed, the EU is struggling to apply collaborative governance methods and multi-level policy coherence in existing cross-sectoral strategies like the Circular Economy Package. Despite plans to coordinate action and co-construct solutions with a broad range of stakeholders (EU Commission, 2019), the EU has struggled to foster

[4] A description of the allocation of these funds may be found, on a country-per-country basis, at https://cohesiondata.ec.europa.eu/countries.

[5] Reflexivity refers here to the ability to use flexible, adaptive, and learning-based approaches in decision-making processes (Voss and Kemp, 2006; De Schutter and Lenoble, 2010). Rather than rely on narrow problem-solving strategies, reflexive learning allows governance actors to question existing approaches and reshape policy objectives based on new knowledge and previous experience (Voss et al., 2006). Further, collaborative governance allows actors to meet on a level playing field, and encourages collective inquiry, co-operation, and deliberative dialogue (Paquet and Wilson, 2011). Together, collaboration, practice-sharing, and reflexivity move beyond traditionally hierarchical governance to encourage the involvement of a wider variety of voices and interests in shaping policies.

Member State cooperation on food waste, to promote a harmonized approach in terms of defining and measuring food waste, to adapt EU policies in light of Member State experimentation, and to build a truly coherent and non-contradictory framework (Ferrando and Mansuy, 2018).

Building sustainable food systems is therefore contingent on a deliberate shift towards multi-level governance. Where EU-level agricultural policies remain focused on universally applicable technological innovations, a multi-level integrated food policy can refocus on supporting the social innovation and experimentation that is emerging from the bottom up, and holds major potential to increase access to healthy diets and to address a range of other sustainability challenges in food systems.

3.3. Governance for transition: from the tyranny of short-termism to adaptive, pathway thinking

Moving towards healthy diets and (more broadly) sustainable food systems is not just a question of avoiding conflicting objectives in the present. It is also contingent on placing those policies on parallel trajectories towards the same long-term goals, and carefully sequencing the steps along the way. In other words, a third aspect of the governance shift is to move from the tyranny of short-termism to adaptive, pathway thinking that facilitates a wholesale transition in food systems.

Since the turn of the century, a range of new challenges has come sharply into focus. As described above, the spread of obesity and NCDs has become an urgent problem across Europe: food and farming systems are now expected to provide not simply a sufficient amount of calories, but high quality, nutritious foods, and diversity in diets. Environmental sustainability challenges are equally stark. According to the latest IPCC assessment, GHG emissions must decline by about 45% from 2010 levels by 2030 and reach net zero around 2050 in order to limit global warming to 1.5 degrees and avoid the severest impacts (IPCC, 2018). Resilience in the face of weather or economic shocks, rather than efficiency alone, has emerged as a major concern. This has led to a new emphasis on the need to support smaller-size farms and to stem the process of land concentration, as a prerequisite for preserving the social fabric and ecological integrity of Europe's rural areas. Commitments to address these challenges have been made by the EU and its Member States under the UN Sustainable Development Goals and the 2015 Paris Agreement.[6]

However, food system policies have been slow to adapt to the new challenges. While immediate crises like wars tend to spark rapid and radical governance shifts, including cross-party collaboration and new resource allocations, slow-burning crises like climate change, biodiversity loss, and the global obesity epidemic do not appear to do so. Public policies are highly path-dependent and siloed, continuing to chip away at problems that are increasingly self-reinforcing and systemic. The modern CAP remains rooted in the priorities of the post-war period, when the memory of food shortages and widespread poverty were still alive, and the mass production of staple commodities was the key concern (Massot, 2016; De Schutter, 2017; IPES-Food, 2017a). Improving the competitiveness of European farmers has been the main justification for the market support measures deployed for decades under the CAP, and subsequently for direct payments.[7] These solutions still dominate, taking precedence over health and sustainability goals (Birt, 2007; Schäfer Elinder et al., 2006), and are now locked in by a number of factors that have co-evolved and reinforced one another over the years; technological choices, economic incentives in the form of subsidies and taxation, investments in infrastructure, regulatory frameworks, and hurried lifestyles that prioritize convenience (and convenience foods) are all converging to maintain current systems in place.

Solutions have been adopted on the basis of fitting into the existing paradigm, and delivering short-term gains, rather than in terms of their capacity to meaningfully address the challenges we face. New technologies have been widely embraced on the basis of modernizing agriculture and delivering cost savings, without deliberate consideration of the whole range of social, environmental, and cultural impacts – from increased consolidation of power in the hands of agribusiness and the food industry, to reduced employment and deskilling as a result of robotics and automation – and how they will manifest over time (EC Food 2030 Expert Group, 2018). Despite increasing recognition of its potential to address multiple food system challenges (see for example IAASTD, 2009), agroecology has been treated as a set of discrete technologies rather than as a systemic alternative. It has therefore been incorporated only partially into the repertoire of potential solutions for food systems, the prevailing pathways of which have barely been questioned.

Current institutional structures and cultures are ill-adapted to the complexities of overcoming short-termism and sectoral boundaries, and mapping out long-term trajectories. Although the European Commission has some of the basic capacities to deal with complex issues, the deployment of these capabilities remains relatively ad hoc (Candel and Biesbroek, 2018); the path dependencies created by current institutional structures have created a culture of unresponsiveness, in which units tend to avoid reflexive cooperation in fear of losing a policy to another unit or DG (Candel, 2016; Moragues-Faus et al., 2017). A lack of political will and leadership, as well as capacities and resources, results in poor integration across sectors and levels of policy-making (Mickwitz and Kivimaa, 2007; Rayner and Howlett, 2009).

It is clear, therefore, that food systems cannot change course without deliberate steps to move beyond the short-termism and path dependency engendered by existing solutions and embedded in current governance structures. Only an integrated policy with a mandate to address the whole system can drive the coordinated shifts that are required across food production, processing, distribution, and consumption (Freibauer et al., 2011). For instance, it is not possible to encourage shifts towards sustainable production without also encouraging a change in consumption habits and the food environments that shape them, and not without addressing the various tools, including access to land, public procurement, and decentralized small-scale processing facilities, that can enable a new generation of farmers to emerge and secure their access to markets. These shifts require a policy framework that is designed to coordinate wide-ranging actions over time, and is not bound by the short-termism of electoral cycles.

Furthermore, a food policy designed for transition can address the embedded power relations running along the chain, which reinforce the 'lock-ins' described above. According to Galli et al. (2018, p.7), a transition policy should "acknowledge the existence of resistances to change and 'systemic lock-ins' that constrain the current pathway of evolution of the food system to sustainability. […] A transition policy should affect system activities, challenge the identities, the practices, the interests and the values of a multiplicity of actors and administrative bodies." An EU Common Food Policy, designed with these goals in mind, would allow short- and long-term objectives to be clearly distinguished, trade-offs to be weighted, the long-term costs and benefits (or 'externalities') to be assessed, and accountability to be allocated. In the absence of that vision, we are simply paralyzed by the trade-offs, and continue to look to short-term fixes – despite the problems they leave unaddressed.

3.4. Food democracy: from democratic deficits to new forms of engagement

Building new democratic mechanisms into decision-making is a

[6] The Paris Agreement refers to the agreement negotiated at the 21st Conference of Parties to the United Nations Framework Convention on Climate Change.

[7] According to the European Court of Auditors, income support is the main rationale for direct payments to farmers, even after the introduction of 'greening' measures in 2014 CAP reforms (European Court of Auditors, 2017).

fourth and final component of the revised food systems governance we require to move towards sustainability (Voss and Kemp, 2006). The discontent about decisions being adopted in a top-down fashion, without those affected being involved, is growing (Paquet and Wilson, 2011); it constitutes the fuel for the rise of populism across the EU. This was exemplified by the public outcry in regard to the trade negotiations being taken forward by the European Commission with the United States ('TTIP'), and the belated reaction against the pact agreed with Canada ('CETA') (Eliasson and Huet, 2018). In both cases, discontent centred on the erosion of food safety and the use of agro-chemicals, which, it transpired, were of paramount importance to European citizens. This revealed fundamental discrepancies between the mandate policymakers assumed themselves to have, and the boundaries that citizens were keen to reassert when given the chance.

The debate on renewing the marketing authorization of glyphosate-based herbicides illustrates a similar disconnect: in 2016, the Commission proposed the adoption of an Implementing Regulation renewing the authorization to place glyphosate on the market for the December 2017-December 2022 period. While the proposal was approved by EU Member States with a qualified majority on 27 November 2017, it had received strong opposition from both the general public and the European Parliament. Indeed, at the same time that the Commission was presenting its proposal, the European Citizens' Initiative (ECI) "Stop Glyphosate" was calling on the Commission "to propose to Member States a ban on glyphosate, to reform the pesticide approval procedure, and to set EU-wide mandatory reduction targets for pesticide use" (ECI(2017)000002).[8] In addition, on 24 October 2017, just days before the Member States' representatives considered the Commission proposal, the European Parliament adopted a resolution stating that "the Commission's draft implementing regulation fails to ensure a high level of protection of both human and animal health and the environment, fails to apply the precautionary principle, and exceeds the implementing powers provided for in Regulation (EC) No 1107/2009 [concerning the placing of plant protection products on the market]" (European Parliament, 2017). In contrast to the public discontent concerning the free trade agreements, in the case of glyphosate, the European Parliament shared public concerns that the precautionary principle was being sidelined in the name of short-term considerations and for the benefit of vested economic interests. In both cases, however, public expectations were disappointed, and the disregard of these concerns fuelled both discontent and suspicion towards the technocratic approach of the Commission.

The existing mechanisms for public participation in policy design and monitoring are falling short. Public consultation in regard to EU policies tends to be tokenistic, given that parameters are often set behind closed doors.[9] CAP reform options, for instance, are established upstream in negotiations over the EU budget (the multi-annual financial framework), without a genuine possibility for civil society to engage. This contributes to a sense of 'democratic deficit': EU policies are seen as operating "top-down",[10] as unresponsive to the interests of those marginalized by current food systems, and as indifferent to other levels and forms of food system governance (see Section 3.2). The need to ensure transparent, participatory, and responsive institutions in today's Eurosceptic climate has never been clearer. Karl Falkenberg, Sustainability Advisor to Jean-Claude Juncker, notes the urgency for governance reform due to the "growing disenchantment of the European citizens with the European construction itself" (Falkenberg, 2016, p.3).

The other side of the coin is equally problematic: the over-representation of specific (economic) interests in EU policy debates, and their ability to capture the agenda. As described above, policies have increasingly been decided in silos, and debates around food systems have become highly fragmented. In this context, powerful actors from the agribusiness and agri-food industries have succeeded in framing food and farming debates around specific challenges and offering their own solutions. For example, the need for the EU to deliver sufficient calories to 'feed the world' has been underlined as the most urgent challenge, thus making productivity-enhancing technologies, greater economies of scale, and improved food safety through standardization, look like the obvious "solutions" to be prioritized (IPES-Food, 2016; Freibauer et al., 2011). Discussion has tended to ignore the connections between environmental and human health risks, which often stem from the same source: highly-industrialized and intensive crop and animal production.[11] Independent researchers have identified the dominant position of agribusinesses/agricultural stakeholders, the European Commission's DG Agriculture and the European Parliament's Agriculture Committee (COMAGRI) as a key factor in stalling action on healthy diets (Walls et al., 2016), as well as in preventing environmental problems being adequately addressed in the CAP (Swinnen, 2015; Freibauer et al., 2011). Delivering public goods such as biodiversity, soil health, and climate mitigation featured among the initial objectives of the 2013 CAP reforms, but was relegated below other priorities as the process evolved (Swinnen, 2015).

Moving towards integrated food policies can remedy the democratic deficit in food systems governance and rebalance power. By shifting the focus from agriculture (and other sectorial policy areas) to *food*, a wider range of stakeholders can be legitimately and meaningfully involved in designing and assessing policies. This would allow power relations and path dependencies to be challenged. It would also pave the way for alliances to be built between all of those with an interest in moving away from the current low-cost, high-externalities model, and making it pay to produce healthy, sustainable food: these include farmers, local food businesses, consumer and health groups, anti-poverty campaigners, development NGOs and environmental groups, and school officials, among others. The forming of such alliances can provide a powerful counter-weight to the ability of incumbents – the champions of the current system – to veto any change to the status quo: the ability of agribusiness interests to capture CAP reform processes, it has been noted, has grown in the wake of fractures between farmers and environmentalists (Buckwell et al., 2017). With the establishment of more inclusive governance mechanisms, locally-based civil society movements – hitherto under-represented in European policy debates – would also be able to form alliances and increase their participation in shaping the policies that affect them at EU and national level. Since social movements tend to invest their energies in fora in which they are truly able to exert influence, this could also encourage such movements to better organize, leading to a virtuous cycle in which a greater room for participation results in more resources being spent on participation, and stronger expertise being built within civil society.

In this context, healthy diets would no longer be able to fall through the cracks of reform processes. The European Parliament's health and environment committee, public health NGOs, and other core stakeholders of an EU *food* policy would surely oppose major allocations of EU funding (including CAP direct payments) that sustain a business-as-usual approach, and would fight for chain wide approaches (e.g. short

[8] The ECI against glyphosate was registered on January 25, 2017 and received support from over 1,070,865 citizens from at least seven Member States (ECI (2017)000002).

[9] While the focus of this paragraph is on public consultation exercises, similar issues are likely to arise in regard to EU multi-stakeholder platforms; however, they were not analyzed in the remit of this article.

[10] While perceptions of the EU have been slowly rebounding, 71% of people feel their voice does not count at EU level (Pew Research Centre, 2014).

[11] The compartmentalization of debates and policy frameworks, and the influence of powerful actors in maintaining this situation, is particularly visible in regard to the health impacts of food systems. This has allowed key inter-connections – the 'food-health-environment nexus' and the 'food-health-poverty nexus' – to be overlooked (IPES-Food, 2017a).

supply chains, public procurement schemes with clear nutritional goals) to be prioritized.

This shift can draw on EU treaty provisions for participatory and deliberative democracy (Art. 11 of the EU Treaty). It can build on the role of the European Economic and Social Committee (EESC) as a promoter of civic dialogue and participatory democracy, and on the role of the Committee of Regions in linking EU-level action and local authorities. The EESC's call for an integrated food policy insists that such a policy could not only improve cross-sectoral coherence, but also "restore the value of food and promote a long-term shift from food productivism and consumerism to food citizenship" (EESC, 2017, p.3). Multi-stakeholder food policy councils, straddling formal and informal governance models and now springing up in cities around Europe, surely have a role to play in closing the democratic deficit in food systems. Mechanisms allowing for direct participation of civil society groups and social movements should not be seen as competing with the role of elected representatives. The ability for polities to address complex issues by enlarging their imagination should not be seen as having a fixed quantity, and there is no communicating vases relationship between elected bodies, with a power to make the final decisions, and more inclusive mechanisms that are equipped to come up with innovative solutions: this would be, in particular, the contribution of an EU Food Policy Council (De Schutter, 2002).

4. Moving forward: How do we get there?

In presenting the political priorities of the European Commission for 2019–2024, the new President of the European Commission, U. von der Leyen, pledged to "support our farmers with a new "Farm to Fork Strategy" on sustainable food along the whole value chain" (von der Leyen, 2019). This commitment follows the recognition by a growing number of organizations of the urgent need to adopt a new, integrated governance approach for food systems: these include scientific panels, civil society groups, and even EU institutions and in-house scientific advisory bodies. The EESC (2017) has called for a "comprehensive food policy [to] build upon, stimulate, and develop common governance at all levels – local, regional, national, and European." The Joint Research Centre, which provides scientific advice to the European Commission, has recommended the creation of a cross-sectoral taskforce for food and the environment, in order to develop a Common Food Systems Policy and break the silo effect surrounding the CAP (Maggio et al., 2016). The OECD has highlighted the need for all countries to adopt integrated approaches to agricultural policy in lieu of "marginal fine tuning of existing policies" (OECD, 2015).

While the implications for diets have been underlined in this paper, the stakes are similar for a range of socio-economic and environmental challenges in food systems. Whether one is mostly concerned with access to land for young farmers, biodiversity loss, or climate mitigation, it is becoming increasingly clear that progress is contingent on unlocking the inertia and path dependency that runs across food systems governance.

An integrated food policy at EU level – a 'Common Food Policy' – can break the deadlock and pave the way for new objectives to take centre stage, underpinned by new processes of political prioritization and new coalitions of interest. The EU level is particularly apt to adopt policies for transition, drawing on precedents of cross-cutting, comprehensive policies such as the Circular Economy Package, and precedents of long-term accountability-based approaches such as the Scoreboard to review progress on the creation of an area of "freedom, security, and justice" in the EU. A *common* food policy need not imply that new competences be transferred to the EU. Rather, it speaks to the need to adopt a strategic framework bringing together various sectoral policies that affect how we produce food and how we eat in Europe; as described above, a food policy would in fact put a premium on supporting local action and experimentalism. Rather than falling through the cracks of poorly-aligned policies, healthy diets would be one of the central pillars of a Common Food Policy, and one of the core objectives around which sectoral policies (not least the CAP) would have to be rethought.

IPES-Food's blueprint for a 'Common Food Policy' offers a concrete vision of what this policy reform and realignment could look like, and a precedent for participatory policy design (IPES-Food, 2019). The blueprint emerged from a three-year process that included multiple phases of consultation with hundreds of food system actors, and was explicitly designed to overcome the governance problems described above. All stages of the process involved a wide range of food system actors, including: civil society groups and social movements focused on food and farming, health, environment, development, consumer protection, and food poverty; farmers' organizations; scientific researchers and think tanks; representatives of small and large companies in the food distribution and retail sector; and a variety of policymakers, including MEPs from multiple party groups and committees, members of various departments of the European Commission, members of the European Economic and Social Committee (EESC), as well as officials from national ministries and local authorities. To capture the multi-level nature of EU governance, the process included five multi-stakeholder roundtable meetings in Brussels, as well as four local roundtables in cities around Europe where integrated food policies are taking shape. Putting collaborative governance approaches into practice, the process culminated in a major multi-stakeholder forum gathering a large number of food system actors to debate and refine a series of policy proposals using collective intelligence methods.

The final report and its 80 reform proposals seek to capture the objectives and priorities expressed by a wide range of actors throughout the process. Specific proposals are put forward to hardwire the EU institutions for systems thinking and enhance their ability to develop and oversee an integrated food policy. These include a European Commission vice president for sustainable food systems, a 'Head of Food' in every Directorate General, and a Sustainable Food Taskforce under the European Political Strategy Centre. In parallel, the voices of grassroots actors would be channeled into EU decision-making via an EU Food Policy Council.

As the European Commission pursues its efforts to design a sustainable food policy, the European institutions can draw on the comprehensive set of policy proposals brought together under the 'Common Food Policy' umbrella. It can build on the breadth and depth of engagement of the various actors that co-constructed these proposals to overcome the shortcomings of existing governance and foster effective and legitimate responses to the crises in food systems. The limitations of existing experiments should also be noted: securing equitable representation among the many constituencies whose insights are crucial to understanding and reforming our highly complex food systems, as well as fully capturing the regional specificities and interests of all EU Member States, will continue to be challenges.

To conclude, this article has argued that an integrated food policy is required at EU level in order to promote healthy diets and build sustainable food systems in Europe. Focusing on health, it has demonstrated how EU governance structures are proving ill-adapted to tackle the systemic nature of the challenges facing food systems today. Drawing on the findings from the Common Food Policy blueprint developed by a wide range of food system actors between 2016 and 2019, four indispensable aspects of this governance shift have been identified: (i) coherence across policy areas; (ii) coherence between levels of governance; (iii) governance for transition; and (iv) food democracy. As researchers and policy-makers alike increasingly recognize the need to develop comprehensive policy frameworks on the basis of participatory decision-making, EU institutions are now well placed to meet the expectations that have been raised.

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